

Committee Secretary  
Senate Finance and Public Administration Committees  
PO Box 6100  
Parliament House  
Canberra ACT 2600

19 April 2012

**Submission to Senate Finance and Public Administration Committee on  
Therapeutic Goods Amendment (Pharmaceutical Transparency) Bill 2013**

Dear Sir/Madam,

Vifor Pharma Pty Ltd, is an internationally active company, that researches, develops, manufactures and markets pharmaceutical products worldwide. The first Australian office for Vifor Pharma opened in Melbourne in September 2010, and in partnership with Aspen Australia Pty Ltd. manages the marketing and distribution of products available in Australia.

As part of our role as one of the world's leading companies in iron replacement therapy we have a strong commitment to strive for excellence to make a difference in patients' lives. Part of this commitment is regular ethical and responsible engagement with healthcare professionals. Such engagements include medical and patient education.

In addition to strong internal reporting rules and declarations, Vifor Pharma strictly complies with the Medicines Australia Code of Conduct (the Code). Vifor Pharma became a member of Medicines Australia in November 2011 and prior to this date, voluntarily complied with the Code.

The Code sets the standard for the ethical marketing and promotion of prescription pharmaceutical products in Australia. It includes standard for appropriate advertising, the behaviour of medical representatives and relationships with healthcare professionals. To ensure the code continues to reflect community and professional standards and current government legislation, the Code is revised on a regular basis.

To further enhance transparency and address concerns raised by Australian Competition and Consumers Commission (ACCC), Medicines Australia has established a broad-based working group to develop measures and policies regarding payments and other transfers of value between healthcare professionals and the pharmaceutical industry. The Transparency Working Group is due to report in June 2013.

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Vifor Pharma, the Pharma business sector of the Galenica Group - Vifor Pharma Pty Ltd, a company of the Galenica Group

Vifor Pharma welcomes the additional level of transparency that is being developed with healthcare professionals and consumers. Vifor Pharma also believes that healthcare professionals who we work with should be fairly compensated for the service and expertise they provide.

The proposed Bill seeks to undermine the work being undertaken by the Transparency Working Group and does not address the recommendation of the Trimmer Report, which recommended that therapeutic product regulation should include the requirement for each sponsor to agree to abide by an applicable industry self-regulatory Code in its entirety.

For this reason, Vifor Pharma believes the Bill should be opposed and not passed by the Senate.

Yours Sincerely.

James McDonnell  
General Manager, Australia and New Zealand