

April 19, 2013

Senate Finance and Public Administration Committees
P.O. Box 6100
Parliament House
Canberra ACT 2600
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Dear Sir/Madam,

**THERAPEUTIC GOODS AMENDMENT (PHARMACEUTICAL TRANSPARENCY) BILL 2013
("BILL") REVIEW**

I write in relation to the above Bill, and wish to state at the outset that Amgen Australia ("Amgen") supports initiatives that will bring greater transparency to the interactions between industry and healthcare professionals and is committed to complying with evolving requirements.

The prescription medicine industry, through its industry association Medicines Australia, has recently introduced further increased transparency around member company interactions with healthcare professionals through the vehicle of its Code of Conduct. This increased transparency has been an evolving initiative developed through robust and extensive consultation with many stakeholders.

The initiative continues to develop and advance through the work of the Medicines Australia Transparency Working Group ("Group"). The Group's outcomes will likely achieve the policy objectives articulated in the Bill's Explanatory Memorandum in a more effective, comprehensive and collaborative fashion.

Amgen supports the views expressed by Medicines Australia that the Bill is unnecessary and may undermine the substantial commitment to and momentum already in progress around greater levels of transparency.

The Bill aims to "safeguard the integrity of prescribing medicines in Australia"¹

An important part of safeguarding integrity in prescribing is to ensure healthcare professionals have the latest, most accurate information available regarding prescription medicines, which extend and improve quality of lives and which play such a critical role in healthcare.

¹ Explanatory Memorandum, p.2

As a science-driven and values-based company, Amgen is committed to exchanging information with healthcare professionals in an ethical and responsible way and with the best interests of patients always in mind. Amgen's sponsorship of educational events and of healthcare professionals to attend such events enables those professionals to enhance their medical knowledge, to share information and engage with local peers and international experts, thereby, improving outcomes for Australian patients. This is of paramount importance where rare diseases are concerned and there are limited opportunities for scientific exchange about the diseases and treatment in Australia.

Amgen engages healthcare professionals to seek their expertise on disease states, standards of care, to understand unmet medical needs and to conduct clinical trials – all of which are essential to bring innovative discoveries from the lab to patients.

Amgen values the expertise and advice of healthcare professionals with whom we engage, and believes it is appropriate to fairly compensate these highly specialised individuals in a manner consistent with the strict requirements imposed on Amgen by the Code of Conduct.

The company has established mandatory standards that all Amgen staff members, consultants, contract workers, and temporary staff must follow when interacting with healthcare professionals and other customers. These complement and reinforce the requirements of the industry's self-regulatory Code of Conduct; breaches of which can result in severe financial penalties and other sanctions.

The Bill would replace some elements of the Code of Conduct with legislation. However, the Bill does not cover all aspects covered by the Code of Conduct so the outcome would be a complex and more burdensome regime of government and self-regulation which would be difficult for consumers and members of the healthcare profession to understand and more complicated for industry to comply with.

For these reasons, Amgen opposes the Bill.

Yours sincerely,

JAMES PRIOUR
Managing Director