



FACULTY OF PHARMACEUTICAL MEDICINE
OF THE ROYAL COLLEGES OF PHYSICIANS
OF THE UNITED KINGDOM

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From the President
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Ms Heather Simmonds
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12 Whitehall
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12 August 2010

Dear Heather

Consultation on Proposals to amend the ABPI Code of Practice for the Pharmaceutical Industry 2008

The Faculty of Pharmaceutical Medicine is a registered Charity which works to advance the science and practice of pharmaceutical medicine for the benefit of the public. The Faculty welcomes this opportunity to comment on the current consultation on proposals to amend the ABPI Code of Practice for the Pharmaceutical Industry 2008.

Regarding the proposed amendments to Clause 14.1, the Faculty recommends that any healthcare professional certifying material of any kind should not only be registered but, where it forms part of the profession's regulatory framework, also hold a current Licence to Practise. They should also be able to demonstrate that they are working within their area of professional competence. This is an important provision that will help to ensure the safety of patients and the public.

The Faculty has received feedback from individual members who do not support the proposed change that would allow promotional material to be certified by a pharmacist and not a medical practitioner. The Faculty would like to question whether the decision to propose this change within the Code was based upon evidence regarding its impact on the safety of patients and the public.

Finally, within the proposed amendment of the supplementary information to clause 5.7 (page 9), there is reference to the 'Committee on Safety of Medicines'. This should be amended to 'Committee on Human Medicines'.

I hope that the Faculty's comments are of assistance and I would welcome an opportunity to discuss these in further detail with you.

Yours sincerely

Dr Richard Tiner PFPM