

**From:** Duncan Keeley [auby17@dsl.pipex.com]  
**Sent:** 07 April 2008 01:04  
**To:** NARHI Ulla (ENTR)  
**Subject:** Legal Proposal on Information to Patients - Public Consultation

6.4.08

Dear Ulla Narhi,

Re: Legal Proposal on Information to Patients - Public Consultation

As a British family physician I would like to respond to the public consultation on this document from the Enterprise and Industry Directorate General of the EC.

- I firmly believe in the importance of improving and standardising information to patients on prescription only medicinal products.
- I strongly disagree with the proposal to amend Directive 2001/83/EC to allow the pharmaceutical industry to communicate directly with patients and the public about prescription only medicines.
- I do not believe that there are any currently agreed and robust methods for distinguishing between advertising and non-promotional communications about prescription only medicines issued by the companies which manufacture and sell them, and I doubt whether such methods could be developed, especially in respect of audiovisual material. Avoiding advertising of prescription only medicines to patients is recognised to be extremely important from a public health perspective in virtually all developed countries. It would be an enormously retrograde step for the EC to make a move towards allowing such advertising, and I believe that this proposal represents such a move.
- It is not in my opinion appropriate for the Enterprise and Industry Directorate to advance a radical proposal of this kind independently from the public health institutions of the EC.
- I do not believe that this proposal puts the interests of patients first, since I do not believe that the pharmaceutical industry can provide the balanced, impartial and comparative information about prescription only medicines and other treatment options that patients need to make fully informed choices about their treatment options.
- I would strongly recommend that this proposal does not proceed further.

Thank you for giving these matters your attention.

Yours sincerely,

Dr. Duncan Keeley MB MRCP(UK) FRCGP  
General Practitioner  
Thame  
Oxfordshire OX9 3JF  
UK