From: Laker Martin (RWN) SE Partnership [Martin.Laker@southessex-trust.nhs.uk]
Sent: 31 March 2008 18:14
To: NARHI Ulla (ENTR)
Subject: European commission public consultation on legal proposals to extend/regularise information to patients from pharmaceutical industries

Dear Madam,

Regarding the above, I have read through the key features (Table 6) and would like to make these points:

As a NHS consultant doctor, I believe I am not alone in having concerns about the proposal to extend the legal rights of pharmaceutical companies to provide information to patients on their products unless there is also a very strictly controlled regulation (that can be effectively and readily applied) over the nature of the information made available. In my view, no more than the information contained within the approved SPC (summary of product characteristics) translated into user-friendly and accessible language the user can understand should be allowed to be made available. This is especially important given that the draft proposals are to allow drug companies to use the TV, radio, world-wide web (internet) and email responding as media in which they can supply information to the public.

Here in the UK (and, doubtless, elsewhere in Europe) health practitioners have long been aware of the extent to which promotion creep enters most interactions between drug companies (and their representatives) and prescribing practitioners, despite the oft-quoted defence of the latter that the information provided to the profession is strictly objective, educational or in the interests of research and therefore non-promotional. They walk a very fine line and it is often crossed, albeit cleverly and rarely blatantly.

Given this perception, frequently voiced, by the prescribing medical profession who are meant to be experts in the field and sceptical by scientific training, think how much more vulnerable and exploitable will be the drug-consuming citizens of the EEC and what a field-day the pharmaceutical industry could have, unless these proposals are ever so strictly regulated. I consider that truly effective regulation will probably be unattainable and, most likely, unenforceable anyway - in a practical sense - unless the Commission is prepared to spend large amounts of citizen tax-payers money in squaring up, in costly legal challenges, to big drug companies with deep pockets.

Why go there? In summary, I consider this aspect of the proposals to be both unnecessary and unwise.

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