

NFTHD #39: Scientific Exchange – one molecule or the lot?

In this Note from the Help Desk, we answer a question posed by a pharmaceutical company hoping to run a scientific exchange meeting focused on a molecule in pipeline, that was expected to be in review with the TGA at the time of the meeting. Specifically, would it be OK to cover only that one molecule, or would the content need to cover all molecules in pipeline for that therapy area?

Our innovative pharmaceutical companies are constantly researching and developing new medicines, and it is appropriate that this knowledge is shared with healthcare professionals who prescribe, dispense, administer and recommend medicines and particularly with healthcare professionals who are actively engaged in clinical research. It is on this basis that the Code allows for scientific exchange, which is covered in Section 7.

Scientific exchange may be either reactive or proactive – it is reasonable for companies to anticipate the needs of relevant stakeholders for this information. So, taking the initiative as this company did, is reasonable and appropriate. However, it is worth noting that proactive scientific exchange runs a slightly greater risk of being perceived as promotional ... and due care and scrutiny should be given to the intent, content and how it is presented. Furthermore, Code Edition 20 has placed a greater emphasis on scientific exchange being a two-way interaction between parties, reinforcing the meaning of ‘exchange’ rather than a one-way flow of information.

In this scenario, we knew that the event was being run by appropriate medical personnel with no commercial (personnel with promotional roles) involvement – a critical step when scientific exchange is about unregistered products or unapproved indications. And in terms of focusing on one molecule, this is OK. The Code doesn’t require a company to cover all molecules in pipeline for that therapy area, but it would be prudent to have a clear rationale for a narrower focus to reduce the risk of perception of promotional intent.

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