

NFTHD #41: Calling for PBAC comments

In this Note from the Help Desk, we answer a question about the appropriateness of using X (previously twitter) as an acceptable form of communication to call for PBAC comments. In this particular instance, the post included the product name. There are a couple of strands to this scenario which are worth exploring.

The Code affirms that companies can communicate with stakeholders who have a role in the registration or listing of a therapeutic good, and that this communication can be proactive as long as the messaging is limited to information that may assist the stakeholder in their role (Section 10). We have been providing advice that companies can have a presence on social media, and that this includes new product / listing announcements, patient stories, calling for PBAC comments...and so on.

The critical issue for anything in the public domain is to ensure that there is no promotion of the product, and that any content being linked or shared is consistent with the Code (i.e. appropriate for the audience).

So, is using X an appropriate communication platform, for this purpose? Being a principles-based Code, we don't endorse some social media channels and not others. X is a popular and mainstream method to communicate with one's followers. In this case, the post would be seen by those who already follow the company, so this itself segments the audience somewhat. It might also be seen by those who search for the product through a keyword search on the internet. So, it is reasonable to be deemed as an appropriate medium to reach an appropriate audience.

Whilst calling for comments for PBAC meetings publicly, be cautious of linking products and therapy areas for products/indications – coupling those two areas runs a risk of it being interpreted as promotional. It would be wise to use one or the other – a product name or a therapy area. The situation you need to avoid is a non-healthcare professional searching for a disease or therapeutic area, and bingo – up comes the post using the product name. So, it's OK to use the product name when calling for PBAC comments, but keep the message slim and factual, and link the post to the relevant PBAC agenda webpage for the audience to get the information they need.

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