

Guidance for industry: Ethical and compliant use of social media

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Purpose of this Guidance

Social media is an umbrella term that incorporates the various online platforms and activities that engage users to participate in, comment on and create digital content, and to allow them to interact, share information and network with others, including peer-to-peer conversations.¹ By its very nature, social media is publicly accessible and facilitates the open exchange of information.

The Medicines Australia Code of Conduct (**‘the Code of Conduct’**) affirms it is appropriate for companies to meet the information needs of the general public, provided that this information adheres to ethical standards and complies with Australian regulatory framework. It also recognises that social media is an appropriate platform for sharing such information.

This Guidance supports and guides the Australian innovative pharmaceutical industry to use social media ethically and compliantly. It is essential that companies carefully manage the considerable risk of ensuring content does **not** promote prescription products to the general public. The word “promotion” or “promotional,” as used in this document, exclusively refers to the promotion of prescription medicines. The Code does not preclude companies from promoting non-product related content to the general public e.g. the company brand.

[1] Social Media definition, Medicines Australia Code of Conduct Edition 20



This Guidance applies to **company social media use** which is directed to third parties, including company owned and individual use where a person can be reasonably understood as representing the company, or the views of the company. Social media accounts (also referred to as handles) on platforms like YouTube, LinkedIn, Twitch, or X that are managed by a company are inherently considered company-owned digital channels. “Company-owned” refers to a social media account that has been **created** by the company or is under the company's **control**.



This Guidance **does not** relate to internal closed-loop digital communication such as company intranet, internal digital company messaging, private communication, or other digital applications such as deep links. Each company will have their own policies and procedures which describe the roles and responsibility of its employees and contractors when interacting in the social media space and this Guidance does not replace those.

Key Overarching Principles

- **O/A Principle 6:** Companies’ interactions with all stakeholders are at all times professional, consistent with all legislative requirements, and appropriate to the information needs of the respective audience.
- **O/A Principle 3:** ... Companies are responsible for providing current, accurate, balanced, and scientifically valid information on products ...[and this applies to] all other Company communications.

Overarching Principles of 1 & 10 are also relevant; being that all Company activities have the purpose of supporting the quality use of medicines and are clearly identified to their audience as a Company activity.

General Considerations

- Social media is an effective tool to communicate appropriate information to a relevant audience. It is important to understand what content is appropriate for the different digital channels and the respective audiences.
- Companies **must ensure** any content meets Australian regulatory requirements, including:
 - content created by the company,
 - content created by a third party acting on its behalf,
 - content created by a Company employee where they can reasonably be perceived as representing the company or the views of the company, and
 - content that is ‘engaged with’ by any of the above entities (such as sharing, commenting, liking, forwarding).
- Product-related content that could be considered promotional should be restricted to a **verified** healthcare professional audience.
- The company’s involvement in content creation or sponsorship should be clearly stated, especially when working with influencers or spokespeople.
- Companies should employ monitoring protocols to moderate their social media posts, including user comments where comments are enabled. In line with pharmacovigilance requirements, companies have a responsibility to monitor and report adverse events discussed on social media. Inappropriate comments should be removed in a timely manner.
- The Code of Conduct applies to Australian legal entities or affiliates, and not the global HQ, overseas affiliate or any legal entity outside of Australia. In this regard, an Australian entity is not responsible for social media activity by their global affiliate / overseas headquarters. **However**, if the Australian entity engages with this content, or the content targets an Australian audience, or the content is posted on behalf of the Australian entity, then the level of responsibility for that content or activity shifts towards the Australian entity. In many of these circumstances, the content should clearly identify as Australian company activity.²

[2] Overarching Principle 10, Medicines Australia Code of Conduct Edition 20

Social Media Step-by-Step

1. Assess the Objective

- Determine the goal of the communication, such as promoting products to a verified HCP audience or announcing product-related milestones (e.g. TGA registration, PBS listing) to the general public. Other examples could be to communicate important safety, dosage or stock information which could be done after consultation with the TGA.
- Questions to ask: Is there a legitimate reason to communicate this information to the intended audience? Does it address their information needs? Is the objective non-promotional?

1

Adapted from the [Joint Note for Guidance on social media and digital channels](#) (IFPMA, 2021)

2. Consider the Audience

- Consider the intended audience as appropriate (HCPs, the general public, patients etc.)
- Identify the risks associated with the social media activity and consider if a closed social media channel or other method of communication is more appropriate.

2

4. Consider Channel Step Up

- Consider the channel's design and its capacity for audience interaction (comments, sharing).
- Ensure the platform aligns with the target audience.
- Be aware of the challenges posed by platforms e.g. limited monitoring or control over comments, font size/prominence of statements, and the presence of 'suggested' content that may be non-compliant.

3

3. Define Content

Questions to ask:

- Does the content meet in any way the definition of promotion or promotional material, as defined in the Code's glossary?
- In addition, would a reasonable person interpret the content as promotional? This includes language, tone and imagery.
- Does the content match the information needs of the audience?
- Has the company's involvement in the content creation (if any) been clearly communicated?
- Should the content be signposted (directing the audience to more detailed information) or directly posted to social media?
- If posting international content, is the content permissible under Australian regulations?
- When conducting disease awareness activities in a specific therapeutic area, has the context of other external company communications been considered? These initiatives should remain distinct from product-specific announcements, as overlapping timing may create a perception of promotional intent.

4

5. Ownership & Control

- Identify who owns or controls the digital channel.
- Consider having posts approved by a final signatory to ensure compliance with the Code and relevant regulatory requirements.
- Ensure your company's social media policy is up-to-date, includes clear guidelines for employees, and is effectively communicated through training across your organisation.

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Product-Specific Media Announcements & Social Media

Why communicate about a product?

The Code affirms that our industry has a unique responsibility to communicate relevant information about the prescription medicines that we develop and sponsor. Pharmaceutical companies can provide the public with non-promotional, accurate, current, and balanced information about products available in Australia that meets their information needs.

However, our regulatory obligation to prohibit the advertising of prescription products to anyone other than healthcare professionals must take precedence over the 'need to communicate information.' Companies must be mindful of the broad scope of what constitutes promotion, particularly on social media, where its reach makes it an effective yet high-risk tool for disseminating information and engaging with stakeholders.

Context and the Code

[Section 10.1](#) of the Code outlines appropriate circumstances for product-specific communication, such as announcing new products, indications, PBS listings, or public funding changes. Each company must assess whether other situations justify consumer-facing statements and be prepared to justify their relevance and necessity if promotional concerns arise. It is important to note that consumer media product announcements are a **one-time opportunity**, described in the Code as a *"single coordinated release across multiple channels"*. This means that reposting, sharing, or liking the content after the initial release - particularly on social media - may be perceived as promotion.

The functionality of a social media platform should be taken into account when managing the risk of perceived promotion. For example:

- a post inviting comments on a PBAC submission with comments enabled may increase this risk, as users could highlight product benefits in their responses to the post. Disabling comments can help mitigate this risk.
- amplification or paid spend of social media posts which serve to elongate visibility over a period of time may increase this risk.

Consistent with the 'system neutral' approach of the Code, Section 10.1 does not outline different requirements for different media channels - the same principles apply regardless of the platform or technology used to share information. This section applies to all channels used by a company when making a product specific media statement, even if individual platforms have limitations, such as character counts or restrictions on the number of links included in a post.

Whilst [Section 10.2](#) is titled *Social Media*, any social media content must comply with all relevant principles and sections of the Code of Conduct, not just Section 10.2. For example, all activities that utilise a social media platform will be considered in the same way as more traditional media activities. This means that any product-specific statements made on social media should also comply with Section 10.1. Please refer to the Appendix for examples.

Risks (real, potential or perceived):

1. **Promotion:** Public communication about a product may inadvertently encourage its use, which could be perceived as promotional - even if there was no intent to promote the product. The wide and uncontrolled audience on social media increases this risk.
2. **Misinterpretation & interference:** With a broad and diverse audience, product-specific communications may risk interfering with the patient-doctor relationship.

Considerations:

The following questions can assist in assessing social media risks and determining whether your proposed content is appropriate:

- **Relevance:** How does the announcement meet the information needs of the general public? Why is it important for the Australian general public and consumers to know this?
- **Educational value:** Is the communication purely informative, rather than promoting the product?
- **HCP prioritisation:** Have healthcare professionals been notified about the product or indication before communicating with the public?
- **Approved products:** Does the communication only relate to approved products or indications? It is not appropriate to make product-specific consumer-facing announcements about unapproved products or indications unless it is a continuous disclosure obligation under the Corporations Act 2001.
- **Disclosure obligations:** If making an announcement is part of your continuous ASX disclosure obligations, companies still need to ensure the communication does not breach the therapeutic goods laws and does not advertise the prescription product. The TGA's Guidance "[Complying with advertising rules for therapeutic goods when making an ASX announcement](#)" is useful.
- **Defensibility:** Can you defend the decision, rationale and content of the communication?
- **Review the context:** Consider the context of other planned broader company communications, such as company-driven disease awareness initiatives, to avoid possible misperceptions. These initiatives should remain distinct from product-specific announcements, as overlapping timing may create a perception of promotional intent.
- **Paid spend:** Consider how paid spend may increase the risk of perceived promotion, particularly by maintaining prominence in users' feeds. While the Code is silent on paid promotion, companies should be mindful of its potential implications. If the content is appropriate and relevant for a consumer audience, amplifying its reach through paid promotion might be justified. However, if it results in prolonged exposure or repeated delivery of the same content over time, companies should carefully assess strategies to mitigate the risk of perceived promotion when boosting content.
- **Enabling and disabling comments:** Companies might consider turning off comments on the content and limiting its engagement to a short, predefined period, as higher engagement typically increases its visibility. If comments remain enabled, companies should be aware of the risk that user responses may include promotional messaging, references to off label use, or other inappropriate content appearing alongside a company post. When comments are enabled, they should always be actively monitored.

Online Influencers / Digital Opinion Leaders

Definition: “A social media influencer is a person or a brand with a notable following in a particular area and the power to affect the views/decisions of their audience. Some examples of online influencers and digital opinion leaders include, but are not limited to, health professionals, patients, patient advocates, celebrities or TV personalities” ([PMCPA Social Media Guidance, 2023](#)).

Why use online influencers?

Social media influencers can help communicate key messages to a target audience. Given the potential of social media to deliver appropriate information to the relevant audience, influencers can be engaged by innovative pharmaceutical companies to deliver important information, such as disease awareness education to people living with a condition. There is no special section in the Code that applies only to social media influencers. Instead, they should be considered like any other third-party engagement or public-facing activity.

One of the key principles when working with an influencer is ensuring transparency, so the audience clearly understands that the company has engaged them for the content they are posting. This applies only to activities where there is a formal collaboration or agreement between the company and the influencer.

Risks (real, potential or perceived):

1. **Unintended promotion:** digital content from influencers has a greater risk of being perceived as promotional.
2. **Influence:** Given their status, digital opinion leaders may have a significant influence over HCPs, patients or other groups, which increases the risk of misleading the audience. Treatment decisions should be based on clinical need and in consultation with a patient's health care professional.
3. **Lack of transparency:** If not adequately stated, the audience may confuse a company's message with the personal opinion of the digital opinion leader.

Considerations:

- **Rationalise the need:** What message do you want to convey? What audience do you want to reach? Make sure the influencer is selected based on these goals.
- **Due diligence:** Review the influencer's past posts and engagement stats to assess their reach and alignment with your company's values.
- **Vetting identity:** Companies might consider a vetting process to confirm the identity of the influencer and ensure the account is genuinely managed by the individual named. This helps maintain authenticity and credibility.
- **Fair market value:** Companies should ensure that the compensation is justified, within reasonable limits and reflects fair market value.
- **Target audience:** Collaborate with influencers who are relevant to your target audience.
- **Proper briefing and understanding:** Clearly brief the influencer on the need for proper messaging and what should not be promoted. Ensure the influencer knows which hashtags to use and whether comments should be enabled.
- **Transparency:** Fully disclose relationships with influencers and company involvement in the content development. For example, "The author of this post has received financial support from Company X," or similar.

- **Content approval:** Ensure all assets intended for external communication go through your company's established approval process.
- **Ongoing monitoring:** Influencers are speaking on behalf of your company, so ongoing monitoring is essential to ensure the content remains appropriate. User comments should also be monitored in line with pharmacovigilance obligations and adverse events reporting.
- **Documentation & auditing:** Maintain clear records of the engagement in line with your company's record management policy. Consider implementing an internal auditing process to review these engagements.

Employee Considerations

Responsibility

Companies may be accountable for posts by employees, contractors, and third-party staff, including personal social media activity if they appear to represent the company, or the views of the company, regardless of direct instruction or approval.

Risks (real, potential or perceived):

- **Impact of liking:** On platforms like LinkedIn, liking a post can have a significant impact beyond just acknowledging it. It notifies the content creator, displays your liking to your network, and can be visible on your profile. Liking content may risk unintentional promotion of prescription medicines or endorsing content that is not aligned with your company's values.
- **Cross-border promotion:** Be aware when sharing international content; what is appropriate overseas is not always appropriate in Australia. Sharing or liking posts about unregistered products or clinical trial data from other countries with different restrictions (e.g., the US) could easily be perceived to be promoting products to a public audience, contrary to the Australian regulatory environment.
- **Endurance of online content:** Old content (e.g. posts from years ago) can be subject to ethical or compliance concerns if it remains visible and accessible.
- **Human error does not absolve companies from responsibility:** Mistakes, even if unintentional, can lead to ethical or compliance concerns. Companies must ensure that employees are trained in respect of compliant use of social media.

Considerations

- **Training and policy:** Companies are expected to have clear social media policies and procedures in place, and to ensure that employees and representatives understand how to use social media in accordance with these. Regular training provides a pivotal step in ensuring that personnel understand their roles and responsibilities in relation to social media. It is also important in remaining conversant in the various social media platforms, as the functionality of these platforms can be updated regularly. These policies and procedures should also be consistent with the principles set out in the Code.
- **Pharmacovigilance:** Companies should consider the role of social media and pharmacovigilance, and put in place policies, procedures and training to allow staff to understand their responsibilities in this area. Applicable monitoring, reporting and record keeping requirements should also be considered.
- **Profile information:** Job titles and descriptions in professional profiles should avoid mentioning or providing immediate access to information about prescription medicines or their indications, as it could be considered promotion. For example, when employees list authored publications associated with a prescription medicine, companies may recommend that employees avoid providing content or easily accessible links that discuss product benefits.

Frequently Asked Questions (FAQ)

A. Is sharing, liking or re-posting the same as posting or commenting?

Yes. A simple thumbs up (like), share or re-post may seem passive compared to writing a comment or posting original content, but it still plays a role in amplifying visibility and engagement. All of these actions represent social media activity, and as such, the same level of care should be taken to ensure compliance with the Code, company policies, and restrictions on promoting prescription products.

Just as companies must review any content they create and post to ensure compliance with the Code, they must also review any content they like, share, or repost on a Company controlled account. This is especially crucial given the global reach of social media and the varying regulatory environments.

Pharmaceutical employees should assume their social media activity is accessible to both healthcare professionals and the public.

B. How can a company combat misinformation on social media?

Given the lasting nature of online content, companies may choose to correct misinformation in an educative, non-promotional manner. The Code allows responses to journalists or editors but confirms companies are only responsible for their own activities, not independent media content.

Correcting misinformation raises challenges—selectively addressing inaccuracies may create further scrutiny. If the misinformation involves a product, responding could unintentionally amplify it, posing a risk of indirect promotion.

Companies should carefully consider their approach. Referencing the Australian PI or CMI may be appropriate, but selectively quoting sections could introduce interpretation, shifting the interaction toward promotion.

Considerations:

- **Assess the need:** Determine the prevalence of misinformation and the appropriate level of correction.
- **Use official references:** Minimise promotional risk by citing official documents like CMIs.
- **Maintain neutrality:** Use factual, non-promotional language, especially when directing consumers to product-related information.
- **Report:** consider reporting posts containing misleading or incorrect information to the social media platform to help maintain accuracy and compliance with industry standards. If misinformation is shared on a company post through the comments, it is the company's responsibility to remove it.

C. What should we consider with tagging, links and hashtags?

Companies are not responsible for independent third-party content but should ensure that hashtags, links, and tags do not inadvertently promote a product or violate guidelines. Hashtags with a history of misuse should be carefully evaluated, links should not direct to inappropriate or promotional content and tagged entities should not lead viewers to prescription product promotion.

A company's responsibility to monitor independent third-party content, such as hashtags, will depend on its level of participation or association with that content.

D. Can social media be used for clinical trial recruitment?

Yes, companies may promote opportunities for clinical trial recruitment, provided it doesn't advertise the therapeutic good. The following should be considered when advertising clinical trial recruitment on social media:

- Do not include product names in advertisements for clinical trial recruitment, as this increases the risk of the content being deemed promotional.
- In advertising clinical trial recruitment to the general public, avoid language or imagery that may give a reasonable person hope that trial inclusion will be the innovation they need.
- Independent websites such as clinicaltrials.gov and australianclinicaltrials.gov.au are preferred links rather than company sites to reduce the risk of bias and provide equity of trial information shared.
- To avoid the perception or potential of undermining the doctor-patient relationship, social media posts advertising clinical trial recruitment should refer an enquirer to their treating HCP for any additional information and discussion where appropriate.

See following page for Appendix.

Appendix: Product-Specific Social Media Examples

Whilst Section 10.2 is titled *Social Media*, any social media content must comply with all relevant principles and sections of the Code of Conduct. For example, any product-specific statements made on social media are considered in the same way as more traditional media activities and should also comply with Section 10.1.

To support interpretation, these examples have been developed to illustrate compliance with Edition 20 of the Code. They are for educational purposes only and use fictitious content, fictitious individuals and a fictitious company (“MyPharmaCompany”). These examples supersede those from Edition 19, as updates and changes have been incorporated. For further information, contact codehelpdesk@medicinesaustralia.com.au.

A – Product registration announcement on LinkedIn



MyPharmaCompany
900 followers

MyPharmaCompany is pleased to announce the registration of **Brand Name** (active ingredient 1) as a therapy for Type 2 diabetes in Australia.

The medicine treats adult patients with type 2 diabetes mellitus for whom <active ingredient 2> is otherwise indicated but was not tolerated. It is not yet included on the PBS.

All medicines have side effects. The most frequently observed adverse events in patients receiving Brand Name were constipation, decreased appetite, rash and hypertension. For more information about the medicine, see the [Consumer Medicine Information \(CMI\) here](#).



MyPharmaCompany

TYPE 2 DIABETES TREATMENT

NOW REGISTERED

FOR USE IN AUSTRALIA

FOR CERTAIN PATIENTS WITH **TYPE 2 DIABETES MELLITUS**

MYPHARMACOMPANY.COM.AU

MyPharmaCompany
<https://www.ebs.tga.gov.au/brandname/cmi>

[Learn More](#)

Like

Comment

Repost

Send

Comments have been turned off on this post. You can still react or share it.

- 10.1 e) i. The product’s brand name
- 10.1 e) ii. The Australian Approved Name of the active ingredients in the product
- 10.1 e) iii. Its approved indications, relevant to the product-specific media statement
- 10.1 e) iv. Therapeutic class
- 10.1 e) v. Public funding status and restrictions, or a notation if the product is not publicly funded
- 10.1 e) vi. A summary of the side effect profile, product’s precautions, adverse effects, warnings, contraindications, and interactions
- 10.1 e) vii. A copy of, or a link to the product’s Consumer Medicine Information

When posting on social media, companies must ensure comments don’t promote prescription medicines to consumers. Phrases like “See your doctor to find out if this treatment is right for you...” can shift a general announcement post to feel consumer targeted. While appropriate for disease awareness (as required by the Code 12.2c), such calls-to-action may not suit product-related content. Companies should make these decisions carefully to avoid promotional messaging.

Companies are to make their own decision on whether it is appropriate to enable or disable comments. Disabling comments and limiting engagement to a short, predefined period can help mitigate the risk of (potentially) being perceived as promotional. It also alleviates responsibilities to monitor comments.

B – Product PBS announcement on LinkedIn

MyPharmaCompany
900 followers

BrandName (active ingredient) is now listed on the Pharmaceutical Benefits Scheme (PBS) for the treatment of adult patients with type 2 diabetes.

For more information about the medicine, including side effects such as abdominal pain and dizziness, see the [Consumer Medicine Information \(CMI\) here](#).

As a prescription medicine, only healthcare professionals, in consultation with their patients, can determine the most appropriate treatment options. This medicine should not be taken if type 2 diabetes is already well controlled by diet alone.

“Our investment in science and innovation drives medical advancements. Expanding funded access to therapies is at the heart of our commitment to adult patients with type 2 diabetes. We welcome yesterday’s announcement that BrandName is now listed on the PBS/will be listed on the PBS from 1 July 2025 for eligible adults.”

*Kate Jones, Country President
MyPharmaCompany ANZ*

MyPharmaCompany
<https://www.ebs.tga.gov.au/brandname/cmi>

34 8 comments

Like Comment Share Send

10.1 e)

- ✓ i. The product’s brand name
- ✓ ii. The Australian Approved Name of the active ingredients in the product
- ✓ iii. Its approved indications, relevant to the product-specific media statement
- ✓ iv. Therapeutic class
- ✓ v. Public funding status and restrictions, or a notation if the product is not publicly funded
- ✓ vi. A summary of the side effect profile, product’s precautions, adverse effects, warnings, contraindications, and interactions*
- ✓ vii. A copy of, or a link to the product’s Consumer Medicine Information

- ✓ **10.1 & 10.2:** Does not advertise or include promotional claims for a prescription product to the public
- ✓ **10.1 a)** Content is consistent with the Code
- ✓ **10.1 b)** Appropriate because the information is relevant to the Australian public, such as the announcement of new public funding such as a PBS listing
- ✓ **10.1c)** Issued once. This example post is part of a coordinated announcement, and posted once in coordination with other channels, such as the media statement it links to.
- ✓ **10.1g)** It does not include claims, promotional statements, comparisons to other products, quotes that promote the product, an image of the packaging, reference to an access program, not accompanied by any material that encourages the use of the product.


*Companies are to decide on what and how much information to provide that satisfies vi.

Expectations will be proportionate to the social media context. For example, these are simplified for a consumer-facing audience and proportionate to the information provided in the LinkedIn post. More information would be expected in the product-specific media statement.

When posting on social media, companies must ensure links do not promote prescription medicines to consumers. Linking to the Consumer Medicine Information (CMI) is mandatory. However, linking to a consumer media statement may not be appropriate, as it is intended for media, not a direct consumer audience. Companies should make this decision responsibly, ensuring any content shared is not promotional in nature

C – Calling for PBAC comments on Facebook

Whilst Section 10.2 is titled Social Media, any social media content must comply with all relevant principles and sections of the Code of Conduct, For example, any product-specific statements made on social media are considered in the same way as more traditional media activities and should also comply with Section 10.1.


**MyPharmaCompany**

Have your say on government funding for BrandName (active ingredient), for adult patients diagnosed with Type 2 diabetes. BrandName is being considered for reimbursement at the upcoming Pharmaceutical Benefits Advisory Committee (PBAC) meeting.

The PBAC is seeking public comments on all upcoming medicine submissions; this is valuable opportunity for patients, caregivers, healthcare professionals, and industry stakeholders to provide input on medicines being considered for PBS listing. This input helps PBAC make more informed, patient-centered recommendations about whether a medicine should be subsidised under the PBS.

Comments are due by May 22. Learn more about how to have your say here: bit.ly/4dQ8NeZ


All medicines have risks. See Brand Name's [Consumer Medicine Information \(CMI\)](#) for full safety information on risks, side effects and precautions including the risk of hypoglycaemia.



Have your say on government funding for BrandName (active ingredient), for adult patients diagnosed with Type 2 diabetes

Submission deadline: **May 22**





Public comments provide real-world insights into how a medicine impacts people's lives.


**MyPharmaCompany**

[HTTPS://PBAC.PBS.GOV.AU/](https://PBAC.PBS.GOV.AU/)

PBAC Submission October 2025

[Learn More](#)

 Like  Comment  Repost  Send

 Comments have been turned off on this post. You can still react or share it.

10.1 e)

- ✓ i. The product's brand name
- ✓ ii. The Australian Approved Name of the active ingredients in the product
- ✓ iii. Its approved indications, relevant to the product-specific media statement
- ✓ iv. Therapeutic class
- ✓ v. Public funding status and restrictions, or a notation if the product is not publicly funded
- ✓ vi. A summary of the side effect profile, product's precautions, adverse effects, warnings, contraindications, and interactions
- ✓ vii. A copy of, or a link to the product's Consumer Medicine Information

Note this example includes two links; one to the CMI and the other to the PBAC agenda comments section. Where a social media platform limits links to only one, this will present a challenge.

Companies should determine whether to enable or disable comments at their discretion. However, since the post explicitly "calls for comments," it is recommended to disable comments to prevent any misunderstanding that social media comments are equivalent to commenting on the PBAC submissions.

D – Calling for PBAC comments on X (formerly known as twitter)

This example illustrates an alternative way to call for PBAC comments without using the product's name. In taking this approach, the content is unlikely to be considered a product-specific media statement, and Section 10.1 doesn't necessarily apply.

The intent of this content is to amplify the PBAC opportunity afforded to stakeholders, and without any reference to product. It is likely that Section 12.2 is relevant (educational information).

Section 12.2 - It is acknowledged that members of the general public should have access to information on medical conditions and the treatments which may be prescribed by their doctors. The purpose of such information should be educational ...



MyPharmaCompany @mypharmacompany · 13h ...

HAVE YOUR SAY: The reimbursement application for a new treatment option for diabetes will be considered at the PBAC meeting in October.

For more info: bit.ly/4dQ8NeZ



<https://pbac.pbs.gov.au/>

PBAC Submissions October

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Section 12.2

- ✓ a) may include descriptions of the therapeutic category including classes but does not include any reference to a specific prescription product
- ✗ b) should be presented in a comprehensive, balanced and fair manner that does not unduly emphasise particular options or the need to seek treatment.
- ✗ c) should emphasise the condition and its recognition rather than on the treatment options. The appropriate treatment for an individual patient is for the healthcare professional to decide, in consultation with the patient, and this should be clearly stated.
- ✓ d) must not be presented in a way where the tone of the material unnecessarily causes alarm or misunderstanding in the community, nor stimulate the demand for prescription of a particular product.
- ✓ e) should be intended to provide further material in an informational manner and not as advice

✗ 12.2b) and 12.2c).

Because it is not disease awareness and instead educational information, this example broadly satisfies this principle where it is relevant to the intent and content. It advises consulting a qualified healthcare professional.