# NFTHD #85 - Product-Specific Social Media: Adapting to Edition 20

**It can be appropriate for companies to issue non-promotional, product-specific media statements for the Australian public in certain circumstances. However, referencing a product—particularly on social media—carries higher risks. With its broad reach and rapid content amplification, social media requires careful compliance management. Edition 20 of the Medicines Australia Code of Conduct provides clear guidelines on product-related statements, extending to social media posts as well.**

Code Edition 20, Section 10.1 speaks to the relationship between consumer media and product-specific media statements. This section reinstates key principles from Edition 18, addressing previous ambiguity about which parts of the Code apply to product-specific media statements. It offers clearer guidance for companies managing this higher-risk activity and provides the Code Committees with greater certainty when adjudicating related complaints.

Aligned with the 'system-neutral' approach of Edition 20, Section 10.1 applies uniformly across all media channels. Regardless of platform-specific constraints—such as character limits or restrictions on links—companies must ensure that all product-specific media statements, including those on social media, comply with Section 10.1 (Edition 20).

### Key differences

Companies should note that product-specific social media posts that were acceptable under Edition 19 may not necessarily comply with Edition 20. The key change is that posts must now include the requirements outlined in Section 10.1(e) i–vii (below):

e) The product-specific media statement must contain all of the following:

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; and
vii. a copy of, or a link to the product's Consumer Medicine Information.

### Transitioning from Edition 19 to 20

Companies do not need to revise materials published prior to Edition 20 across any media, including social media, even if the content remains online. However, if any material is re-issued or re-published, it should be reviewed to ensure alignment with Edition 20. This includes social media content.
From March 30 2025, all new or reshared social media content must comply with Edition 20.

*For examples of product-specific social media posts, please view the following pages.*

*Published March 2025, revised June 2025*

# 1 - Product Registration Announcement LinkedIn


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.

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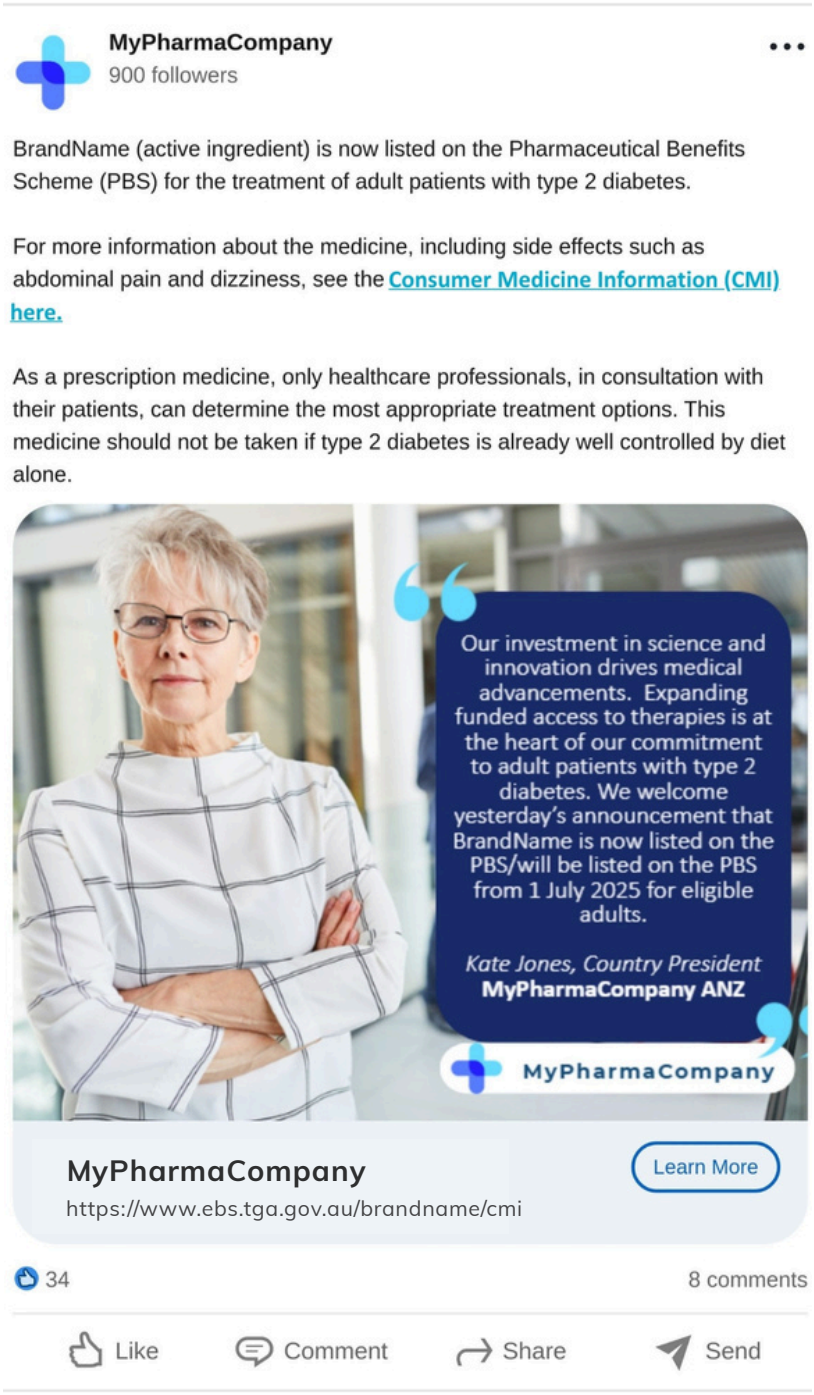
# 2 - Product PBS Announcement




**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

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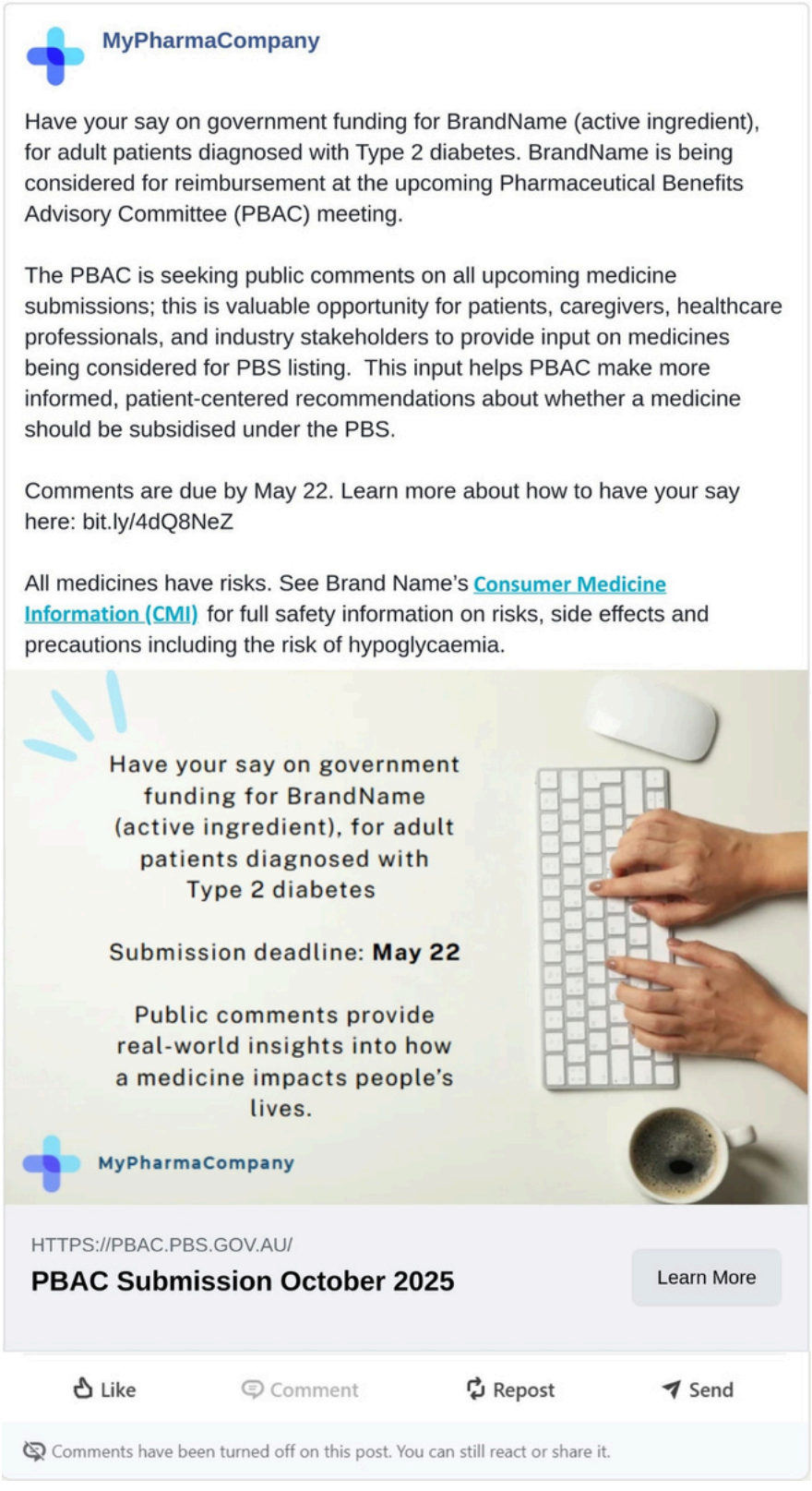
# 3 - Calling for PBAC comments on Facebook

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.




**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.

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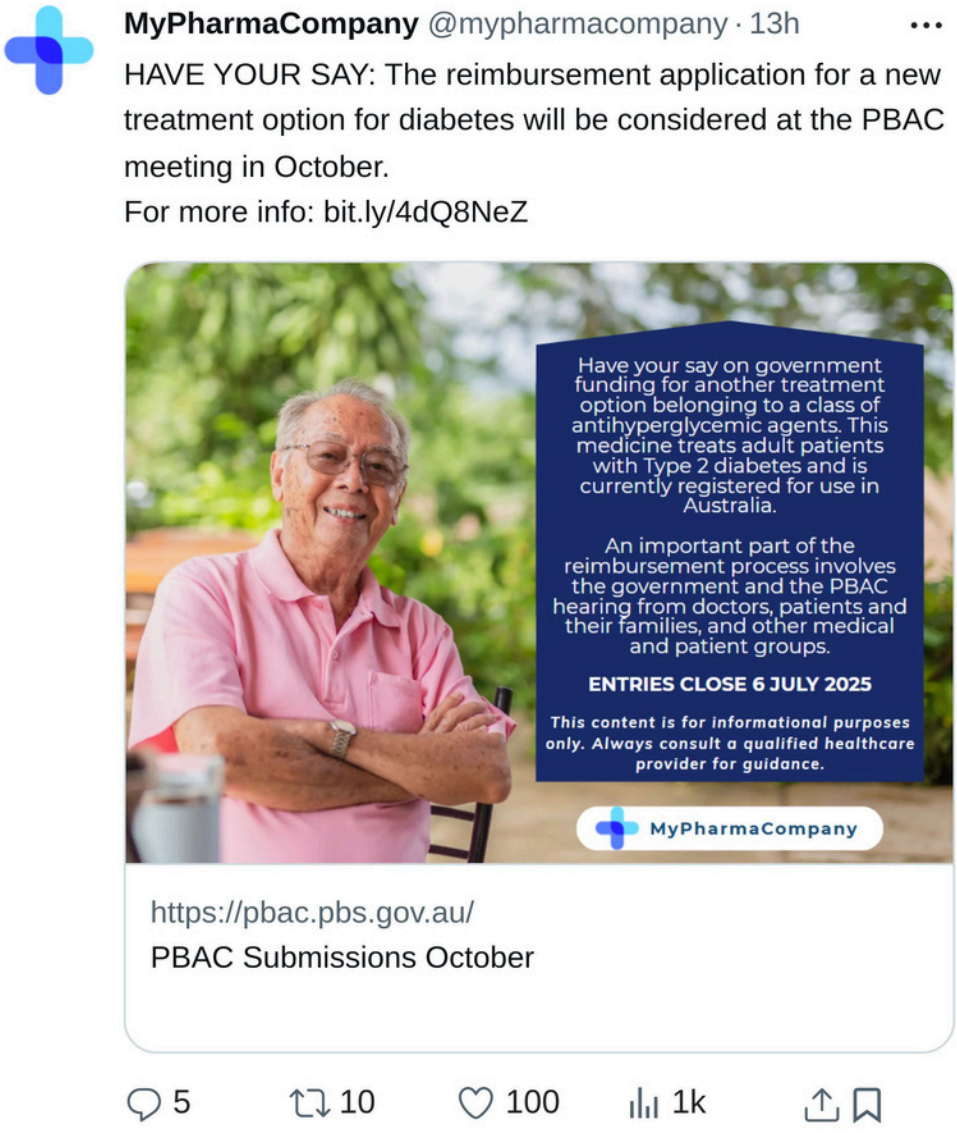
# 4 - Calling for PBAC comments on X (Twitter)

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 …*




**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.

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