

NFTHD #99: Social Media Guidance: How TGA and Medicines Australia Share Common Principles

The Therapeutic Goods Administration (TGA) has released new guidance titled “[Advertising therapeutic goods on social media](#)”, providing practical advice on how advertising rules apply in social media contexts. While this guidance is primarily directed at companies allowed to advertise therapeutic goods to the public (which excludes our industry), it offers important insight into what the TGA considers advertising - making it relevant for us as well.

At first glance, some aspects may seem to differ from the Medicines Australia Code. In reality, they reinforce the same core principles of responsible, balanced communication. Below, we explore two key areas.

Key Issue 1 – Product-related social media posts

The TGA guidance notes that posts made by companies with a commercial interest are more likely to be considered promotional, particularly where product names, therapeutic benefits, positive language, endorsements, or hashtags are used.

The Code, and Medicines Australia Guidance, affirms that it is appropriate for companies to meet the information needs of the general public - including product-specific statements to consumer media - and also that social media can be an appropriate platform for sharing such information.

Are these approaches contradictory? No. We agree with the TGA that posts made by companies about their products are more likely to be considered promotional because they have a commercial interest. This approach is not new; it has always been understood and is consistent with advice provided by both Medicines Australia and the TGA in the past.

It is precisely because of this high risk that the Code sets out rigorous caveats - laying out a detailed framework of ethical standards that provides a possible pathway, but only where strict circumstances and requirements are met. These requirements are designed to keep a product-related announcement - whether on social media or any other platform - as close to non-promotional as possible. They are not guarantees; rather, they serve as a framework to guide companies on how and when it could be appropriate to engage. Our Code states those requirements clearly in [Sections 10.1](#) and [10.2](#) and supported by [Guidance on social media](#).

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Key Issue 2 – Product-related press releases to consumer media

The TGA guidance advises that corporate announcements should avoid referencing prescription medicines, particularly alongside the product indication, therapy area, or key product benefits, as this is more likely to be considered advertising. The Code also affirms that companies can meet the information needs of the general public, including making product-specific statements to consumer media—but only under strict conditions.

Are these approaches contradictory? No. We agree with the TGA that corporate announcements referencing prescription medicines carry higher risk. That is why the Code sets out clear caveats in Section 10.1, detailing when such announcements may be appropriate, what must happen beforehand, and how they should be communicated. These circumstances generally relate to announcements of new product or indication registrations, new public funding such as PBS listings, or changes to public funding - information considered important for the Australian public.

Here's the critical point: the Code does not simply require inclusion of the therapy area and approved indications. It also mandates other elements designed to balance the communication and keep it factual and informative rather than promotional. These include:

- A summary of the side effect profile, precautions, warnings, contraindications, and interactions, and
- A copy of, or link to, the Consumer Medicine Information (a credible, non-promotional source)

When considered as a package, these mandatory elements work together to “lift” the communication - helping ensure that while the public is informed about availability and access, the message remains balanced. Benefits are not highlighted; instead, they are offset by safety and risk information.

Context and Intent Matter

All guidance, TGA and Medicines Australia's included, cannot capture every nuance. Context and intent remain critical. During the 2024 Code Review, the TGA acknowledged that even when Code requirements are met, material can still be judged promotional based on its overall tone and purpose. There is no absolute safe zone.

Because the TGA guidance must apply across a very broad range of sectors - including complementary medicines, natural healthcare products, non-prescription consumer healthcare, generics and biosimilars, devices, medicinal cannabis, and prescription injectables - it takes a cautious, high-level approach. It cannot address every scenario in detail. By contrast, the Medicines Australia Code provides a more specific framework tailored to our industry, setting out clear requirements to support responsible communication and risk-based decision-making.

The TGA Guidance offers valuable insight into risk areas and reinforces the importance of responsible communication, as well as risk-based decision-making.