

29 October 2013

Andrew Howlett  
Assistant Clerk  
Public Petitions Committee  
The Scottish Parliament  
Holyrood  
Edinburgh  
EH99 1SP

Dear Andrew

I am writing in relation to Public Petition no PE01493 titled "A Sunshine Act for Scotland." This petition calls for Scotland to introduce a Sunshine Act, which includes the creation of a searchable record of all payments healthcare professionals receive from the pharmaceutical industry.

Collaborative working between healthcare professionals and commercial life sciences organisations has long been a positive driver for advancements in patient care and the progression of innovative medicine. Both parties regularly join together, during early scientific research, clinical trials and medical education in the interests of delivering and advancing high quality patient care. Despite industry and professional bodies having guidelines in place to ensure such collaborations are conducted with utmost integrity, there are still concerns around the ethics and transparency of these relationships, which are highlighted in articles Mr Gordon cites in his petition.

The pharmaceutical industry recognises that it has a responsibility to show leadership in advancing responsible transparency, and supports measures that will enhance relationships between industry, healthcare professionals, patients and the wider public. The pharmaceutical industry in the UK and across Europe has taken tangible steps to address these concerns and increase transparency of financial relationships in a meaningful way.

In June 2013 the European Federation of Pharmaceutical Industries and Associations (EFPIA), the body which represents the pharmaceutical industry across Europe, announced its ambition to work with the healthcare professional community to introduce disclosure of financial relationships beginning in 2016 for payments made in 2015. This commitment has been embodied through the development of a new Disclosure Code, which was ratified by the EFPIA General Assembly in June 2013.

Under the Disclosure Code, EFPIA Member Companies will be required to disclose payments to individual healthcare professionals in certain categories, including sponsorship to attend medical education meetings, consultancy services (including speaking at meetings, sitting on an advisory board, etc) and training services. A link to EFPIA's recently published Disclosure Code is included below. This development represents a step towards fostering greater transparency and building greater trust between industry, the medical community and societies across Europe.



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The UK is in a strong position to develop a collaborative model for disclosures to meet EFPIA requirements in 2016 and to meet the high expectations of stakeholders, along the lines of Mr Gordon's recommendation for a central register for payments.

Earlier this year, a consultation was conducted by the Ethical Standards in Health and Life Sciences Group (ESHLSG) to identify in principle whether there would be support from the healthcare professional community for a centrally-hosted single searchable database, with a proactive role for healthcare professionals in validating and submitting financial information. The overwhelming majority of respondents – which included representatives of the leading healthcare professional bodies and associations in the UK, commercial organisations and over 1,000 individual healthcare professionals – agreed that payments should be publicly declared through a single searchable database (79%), and that healthcare professionals should have a role to play (77%). Links to further information about ESHLSG, and the full survey results are included below.

The overwhelmingly positive response to the consultation provides a clear mandate to take the idea forward for a central platform for disclosures. The results are being used as a basis for further debate, dialogue and action, and will be driven by individual ESHLSG member organisations, including the ABPI. A multi-stakeholder event is currently being planned for late autumn 2013 to identify what organisations need to be involved in the development of a central register for disclosures, and to discuss practical issues such as the role of individual healthcare professionals and who should host the system. The outputs of this event will be made public.

If the committee requires any more detail we would be happy to meet to discuss the issues raised by Mr Gordon in more detail.

Yours sincerely

Andrew Powrie-Smith  
Director, ABPI Scotland

**Further links**

EFPIA's recently published transparency code: <http://transparency.efpia.eu/>

Further information on ESHLSG: <http://www.eshlsg.org/>

The full survey results: <http://www.eshlsg.org/wp-content/uploads/ESHLSG-consultation-results-October2013.pdf>



**About ABPI**

The ABPI (Association for the British Pharmaceutical Industry) represents innovative research-based biopharmaceutical companies, large, medium and small, leading an exciting new era of biosciences in the UK.

Our industry, a major contributor to the economy of the UK, brings life-saving and life-enhancing medicines to patients. Our members supply 90 per cent of all medicines used by the NHS, and are researching and developing over two-thirds of the current medicines pipeline, ensuring that the UK remains at the forefront of helping patients prevent and overcome diseases.

The ABPI is recognised by the UK Government as the industry body negotiating on behalf of the branded pharmaceutical industry, for statutory consultation requirements including the pricing scheme for medicines in the UK.