



mmw3degrees



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Please see reverse for Terms and Conditions

September 20, 2013

Attn: Code of Conduct Manager

Code of Conduct Edition 18 Review Submission

mmw3degrees is a Direct Marketing provider to some of the largest brands in Australia. With over 17 year's experience, mmw3degrees has played a vital role in the Healthcare and Pharmaceutical industry. We currently work with the largest Pharmaceutical companies in Australia, to manage and deliver an extensive range of direct marketing campaigns, including complex Patient Support Programs and Product Familiarisation Programs. Starter pack distribution is within our capabilities and we currently hold a Poison's License with The Department of Health, which allows us to store and distribute Schedule 2 to Schedule 4 pharmaceuticals. We are also recognised by the TGA to manage drug recalls across Australia.

We would like to make the below recommendations for you to review, to be included in Edition 18 of The Code of Conduct.

The below are our recommendations specifically related to **Section 2 Promotional Material Directed at Healthcare Professionals:**

- In 2.1.3 it mentions that *postcards, envelopes and wrappers must not carry matter that might be regarded as promotion to the general public*, please specify what is deemed as 'promotion to the general public'? For example, can the use of a product name be used on an envelope ensuring that the active ingredient name/dosage is excluded.

The below are our recommendations specifically related to **Section 7 Starter Packs:**

- Logistics: Many Pharmaceutical companies are moving away from the traditional method of representatives handing out starter packs, in particular in the rural areas where they are not frequently visited. There is currently no mention of how starter packs should be distributed in these situations.
 - Please clarify how starter packs should be sent. Australia Post is Australia's postal service, and should therefore be treated no differently from any other logistics company in Australia. There are multiple services that Australia Post provides, and therefore it should be acceptable to send starter packs via standard registered post, as an acceptable means of sending, tracking and auditing.
 - In Edition 17 of the Code, 7.7, there is mention that GP's can request samples to be accepted by receptionist, providing they give permission. If this cannot be an acceptable standard, can it please be specified that this is acceptable across digital platforms via a clause on the request form or verbal permission over phone/skype etc.

Thank you in advance.

Kind Regards,

Loretta Munns

Account Director - Pharmaceuticals