Association of International Pharmaceutical Manufacturers
Ассоциация международных фармацевтических производителей

Questions and Answers to the AIPM Code of Practice

1) Question: *What is the intended use of printed advertising materials and "reminder" advertising? And in what lies the difference between printed advertising materials and "reminder" advertising?*

Answer: Pursuant to the AIPM Code of Practice (hereinafter – "Code") "reminder" advertising is the variety of printed advertising materials.

Printed advertising material for healthcare professionals, as provided by sub-clause 3.2.1, and for general public, as provided by sub-clause 4.2.1, - it is the material containing true and complete information, which, as a whole, enables healthcare professionals or for consumers (patients) (for consumers/patients – only for over-the-counter pharmaceutical products) to get an idea of properties of the pharmaceutical product to the extent of its registered indications for use. Such material should contain information consistent with the requirements of sub-clauses 3.2.1 and 4.2.1 of the Code and in accordance with the requirements of the Federal Law "On advertising".

In the meantime, "reminder" advertising for healthcare professionals as provided by sub-clause 3.2.2, and for consumers (patients), as provided by sub-clause 4.2.2 (for consumers/patients – only for over-the-counter pharmaceutical products), - it is the material containing minimum information pursuant to the requirements of the Federal Law "On advertising" with the obligatory reference to the necessity of familiarization with the package leaflet or to obtain healthcare professional consultations. "Reminder" advertising material may contain the name of a pharmaceutical product (the trade name), therapeutic area of pharmaceutical product and/or brief information, such as slogan and/or key short message aimed exclusively at reminding of pharmaceutical product. However, this specified information should not induce expressly or implicitly to prescribe or to purchase pharmaceutical product, for example, by pointing at advantages of the product. Therefore, "reminder" advertising can be put at the particular place, where healthcare professionals or consumers (patients) have an opportunity to acquire additional information about product.

For example, in pharmacies, at the specialized exhibitions, congresses, conferences on billboards of pharmaceutical companies. For example, such type of advertising materials as "shelf talker", "wobblers", which are usually used in pharmacies and placed in close proximity to over-the-counter pharmaceutical products, may be defined as "reminder" advertising and characterized without limitation (inter alia) by the reason that in advertising location consumer/patient has direct access to the package leaflet or has an opportunity to obtain pharmacist/pharmaceutical professional consultations on properties characterization of over-the-counter pharmaceutical product.

2) Question: *What is meant by the term of "pharmaceutical product's launch"?*

Answer: Pharmaceutical product's launch – first actions of giving information to the healthcare professionals and/or patients on over-the-counter pharmaceutical product to the extent that these actions are taken by pharmaceutical company after the state registration of pharmaceutical product or of new indication for use within the territory of Russian Federation. Examples of these actions are the following: launch of pharmaceutical product/or of new indication for use.

Besides, samples of pharmaceutical products may be provided to non-commercial medical organizations in the event that new indication for use is registered for treatment of another nosologic unit (pursuant to the ICD) or of a disease in another therapeutic area, or is aimed at treatment of particular groups of patients (for example children, patients with kidney or hepatic dysfunction and etc.). But at the same time variation of indications within the frame of the disease state and/or extent of disease may not be considered as a ground for providing samples.

Concurrently with the aforementioned, variation of pharmaceutical form may be considered as the sufficient ground for providing samples in exceptional circumstance when such variation leads to substantive change of administration route of pharmaceutical product. For example, parenteral use is added to the oral use. Therefore, healthcare professional is given an opportunity to obtain new experience in application of pharmaceutical product.

3) Question: *What is meant by "reasonable limits" in sub-clause 3.3.6 of the AIPM Code of Practice?*

Answer: For the purposes of sub-clause 3.3.6 of the Code, the term "reasonable limits" refers to the average cost of meals at events of such type (taking into account the duration of an event and number of participants) conducted by pharmaceutical companies in a particular region or in the whole country. AIPM member companies should have specific cost limits set by their internal documents.

4) Question: *Is it permitted to put company logos, trade names of pharmaceutical products and other components of a pharmaceutical company's product brands on the stationary items which may be provided at events according to sub-clause 3.3.5 of the AIPM Code of Practice?*

Answer: It is permitted to provide inexpensive stationery (pens, paper pads, and pencils) at events, for the purpose of taking notes or keeping records, only as long as these stationary items do not bear pharmaceutical company logos, trade names of pharmaceutical products or other components of a pharmaceutical company's product brands.

Comment: These restrictions will take effect on January 1, 2015.