



TO THE NATIONAL ORGANISATION FOR MEDICINES (EOF)

Ms Sotiropoulou

Department of Approval of Scientific Events

CC.

1. Vice President of EOF
2. Legal Department of EOF
3. General Managers of Pharmaceutical Companies-members of SFEE

Chalandri 9-1-2015

Re: Circular No 106329/15-12-2014 for Scientific Events

Dear Ms Sotiropoulou

By virtue hereof, we would like to express our protest for a series of **omissions** of the new circular No 106329/15.12.2014 in relation to the hosting of scientific events, which creates severe substantial and practical problems in the operation of grants for scientific events and in general, the promotion of prescribed products of the companies of our industry, through the institution of scientific events.

We point out from the start that one of the purposes for the issue of the circular in question (106329/2014) and the preceding circular (64740/2013) is the **retention of the pharmaceutical expenditure against uncontrolled prescribing** (see justifying thoughts of the recitals). In addition, the preceding circular (64740/2013) which has been transposed into the Code of Ethics of SFEE and has been approved and ratified by the European Association EFPIA, is now a fixed practice of the market for a long period of time, thus any deviation therefrom, creates confusion both in the Greek and in the European market.

Suggestively and not restrictively, it is observed that the seasonality criterion is omitted, a criterion which has been set among others, for cost retention, that the limits at the sponsorship amounts per each type of scientific event are omitted (e.g. up to €2,500, €10,000, €20,000 and so forth), limits that had been set in the preceding circular No 64740/2013 etc. It is obvious that the abolishment of these

limits favours the creation of conditions of unfair competition. It is also observed that the enactment of a limit to the number of participation in conferences held in Greece has been omitted (up to 5 Healthcare Professionals (HCPs) per year) and conferences held abroad (up to 3 HCPs per year), the enactment of a limit in the number of the HCPs participating in conferences held abroad (up to 30 HCPs in Europe and 10 HCPs in America per Pharmaceutical Company), the accommodation limits are unjustifiably increased from €140 VAT included in Greece for staying overnight and €70 plus VAT for meals, to €250 plus VAT (staying overnight and meal) and from €250 not including VAT abroad and €70 not including VAT for meal, to €400 not including VAT (staying overnight and meal), amounts which are unjustifiably high, mainly for Europe, given the scientific/professional character of the participation. The presence of accompanying escorts is not prohibited, only the cover of their costs by Pharmaceutical Companies and there are many other series in our opinion, omissions and deviations, which we would like to present to you in person.

Apart from the above, series issues for violations of the law are raised, including, but not limited to, the case of honorarium of physicians, where according to article 36 of Law 4272/2014, they are only permitted in scientific events type A and B, while they are expressly prohibited events type C and according to the circular, they seem to be permitted in any type of scientific event (A, B, C and D). It is prohibited to organize in Greece type D Events from foreign scientific agencies, a fact that directly opposes the general principles of EC law for free provision of services, promotion of education, scientific information and freedom of expression. By omitting the upper limit of physicians entitled to participate, in conjunction with the omission to grant training leave to NHS physicians, a serious expenditure encumbers the State Budget and the NHS faces severe operational problems (in the case of NHS physicians) at the expense of the Greek Patients. It enacts, in violation of the provisions of the Civil Code the contractor (PCO) as accountable for the review of the project, while the project's owner who is scientifically in charge should be held accountable (the scientific society), who is also the agency approved by EOF, while the contractor is held accountable against the project's owner for other violations for which we reserve to present to you in person.

We point out that three meetings had already been held - before the issue of the circular - with the President of EOF and the competent persons of PEF and the

conferences committee of EOF, in which we had agreed upon further improvements of the preceding circular, in favour of transparency and in no case the changes that we saw later in the new circular had been presented to us, which also led to today's difficult circumstances.

Consequently, we request the prompt suspension of the Circular No 106329/15-12-2014 and the conduct of a meeting with the Vice President of EOF and the other competent officers of your organization for scientific events, in which we will justifiably and fully present our remarks, since apart from the market disturbance, there are many points in which the circular directly opposes legislation currently in force, as we pointed out above, and this is why it should be suspended.

Yours sincerely,

For SFEE

Michael Chimonas

General Manager

Markos Gerassopoulos

Vice President of SFEE
Responsible for issues concerning the
Code of Conduct