



Promotion of Prescription-Only Medicines to Healthcare Professionals




What, When and How to promote Prescription-Only Medicines (POM)







WHAT is promotion of POM to Healthcare Professionals (HCPs)?

-  Any activity which promotes the prescription, supply, sale, administration, recommendation or consumption of POM.
-  Promotion of POM to the general public is prohibited.

WHEN a POM could be promoted?

-  From the grant of the marketing authorisation allowing its sale or supply.

HOW a POM should be promoted?

-  Minimum content: consistent with the summary of product characteristics (SmPC), supply classification, selling price and reimbursement conditions.
-  In an accurate, balanced, fair, objective, and sufficiently complete manner. It must not mislead by distortion, exaggeration, undue emphasis, omission or in any other way.
-  All promotion sources must be quoted.
-  Comparative promotion must be based on relevant and comparable aspects.
-  Transparency of promotion: Avoid disguised promotional activities. Be clear and transparent when sponsoring or financing the publication of materials, whether promotional or not.
-  Encouraging its rational use.

Promotion of POM to HCPs

Real Life Scenarios



Press releases: information vs promotion

What is the purpose of a press release?

- Guarantee and be clear about its informative purpose and intentionality.

Are we authorised to use the product name in press releases?

- Avoid undue and disguised promotion. For example: avoid unjustified and repetitive reference to POM brand, avoid commercial claims and language, etc.



Prior to the grant of the marketing authorisation

Which type of information can be provided before marketing authorisation?

- Non-promotional, general information about research and development programs, and regulatory developments related to the pharmaceutical company and its medicinal products.

And in which context?

- For a commercialised medicine, a pharma company must not promote a new indication prior to the grant of its marketing authorisation for such an indication



For POM promotional materials

Are there limitations on comparing product X to competitor product Y in promotion?

- It is not proper to include, for comparison purposes between different medicines, graphs and tables taken from published studies that are not relevant and comparable.

To whom promotion of POM cannot be addressed?

- It is not allowed to promote POM to the general public or to those recipients different from HCPs.

Curious to know more about Promotion of Prescription-Only Medicines to HCPs?

Please refer to following link or connect with your Ethics and Compliance Officer:

[Chapter 1 \(articles 1 to 9\), pages 16-18](#)

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