

Newsletter

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In This Issue:

Revisions to Singapore Association of Pharmaceutical Industries ("SAPI") Code Effective from 1 February 2020

New National Drug Formulary Initiative to Centralise All Clinical and Drug-Related Information

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Revisions to Singapore Association of Pharmaceutical Industries ("SAPI") Code Effective from 1 February 2020

The Singapore Association of Pharmaceutical Industries Code of Conduct (the "**SAPI Code**") has been revised to align with the recent amendments made to the International Federation of Pharmaceutical Manufacturers & Associations Code of Conduct 2019. SAPI is an organisation that represents the interests of 42 pharmaceutical companies ("**Member Companies**"), and the code provides guidance for these Member Companies in efforts to promote a high standard of ethical conduct.

The revised SAPI Code, which takes effect from 1 February 2020, introduces the following changes:

a. Restrictions on "items of medical utility" revised

Article 7.5.3 has been revised to clarify that "items of medical utility" offered to Health Care Professionals ("**HCP**") must be beneficial to *enhancing* the provision of medical services and for patient care. Such gifts in the form of "items of medical utility" are defined as those intended for the direct education of HCPs and/or patients, which do not have value to the HCPs outside their practice and educational needs. Such items might include an inexpensive anatomical model for use in an examination room. However, items that would offset costs that a HCP would otherwise incur in the usual course of his practice, such as a stethoscope or a blood pressure machine, do not count as permissible items of medical utility.

Whilst the 2019 version of the SAPI Code was silent on the branding of these items, the 2020 revision explicitly provides that such "items of medical utility" can include a company's name. However, they must not be product branded, unless the product's name is essential for the correct use of the item by the patient.

The revised article further clarifies that items offered free of charge must be of modest value.

b. Advertising requirements revised to support e-labelling

Article 5.13.9 now enables companies to use QR codes and data matrices on full advertisements to provide certain prescribing information required under articles 5.13.2 to 5.13.4, namely the product's contraindications, precautions and side effects, locally obligated warnings, and a statement that full prescribing information is available on request.



The QR code or data matrix must be linked to the full prescribing information via a website that is compliant with the Health Products (Advertisement of Therapeutic Products) Regulations 2016.

c. Compliance requirements regarding disease awareness campaigns removed

Article 12.3 of the 2019 version of the SAPI Code, which required Member Companies to comply with the Health Promotion Board's Disease Awareness Guidelines in assisting with public / patient disease awareness campaigns, has been deleted.

d. Preamble of SAPI Code revised

The SAPI Code's preamble has been revised to indicate that anyone acting on behalf of Member Companies must also comply directly with the SAPI Code.

While the SAPI Code does not have the force of law, acceptance and active observance of the SAPI code is considered mandatory for all Member Companies.

The SAPI Code (updated as at 1 February 2020) may be found [here](#).

New National Drug Formulary Initiative to Centralise All Clinical and Drug-Related Information

The Ministry of Health ("**MOH**") is currently in the midst of developing the National Drug Formulary ("**NDF**"). By consolidating all drug-related and clinical information into a single database, the NDF serves as a Singapore-specific and authoritative reference point for healthcare professionals ("**HCP**"). The initiative is mainly intended to facilitate the efficient delivery of clinical care by providing timely access to information on registered therapeutic products.

The NDF forms a part of the larger MOH-approved National Pharmacy Strategy – a 10-year plan to transform the delivery of pharmaceutical care and medication management in Singapore. Targeted to be launched in the second quarter of 2021, the NDF will be available online to both HCPs and the public, and will be available for downloading onto the electronic systems of public healthcare institutions for internal use. The MOH is seeking to include the following content in the NDF:

1. Clinical information, such as Singapore-registered drug information (indications, dosage, contraindications, etc.) and drug guidance;
2. Drug pricing and accessibility information, such as price guides, subsidy status and general availability across public healthcare institutions; and
3. Drug terminology information, such as the Singapore Drug Dictionary code, descriptions of the drug and brand, and images of the drug.



Comments

The introduction of a single integrated directory is a welcome development for HCPs and patients alike. The NDF has great potential to contribute in guiding evidence-based best practices for medication management. This would enable HCPs to make better-informed decisions and ensure the safe use of medicines.

The NDF seeks to promote patient empowerment through public accessibility, thereby reducing information asymmetry in the market by allowing easy access to clinical information and pricing. It remains to be seen how a balance will be struck between public health interests and private business concerns.

It is also expected to facilitate smoother transition of patients between different case settings and institutions, given the added visibility on drug availability across institutions and the adoption of a standardised drug vocabulary.

More information on the NDF can be found [here](#), while more information on the National Pharmacy Strategy can be found [here](#).

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This may qualify as "Attorney Advertising" requiring notice in some jurisdictions. Prior results do not guarantee a similar outcome.

This alert is provided as general information and does not constitute legal advice.