



## Micro Learning Overview

### 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.

## 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 authorized 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 authorization:

#### Which type of information can be provided before marketing authorization?

- 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 commercialized medicine, a Pharma Company should not promote a new indication prior to the grant of its marketing authorisation for such an indication



### For prescription-only medicines 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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