

Recommendation No. 2 concerning the Pharma Cooperation Code (PCC)**Organisation of events: disclosure of pecuniary benefits****Background**

On 24 June 2013, the General Assembly of the European Federation of Pharmaceutical Industries and Associations (EFPIA) adopted the new EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations (EFPIA HCP/HCO Disclosure Code, which was transferred to the Code of Practice 2019 as part of the Code Consolidation 2019.). scienceindustries is responsible for the implementation of these requirements in Switzerland. Accordingly, the Code of Conduct of the pharmaceutical industry in Switzerland was drawn up in cooperation with expert groups and patient organisations (Pharma Cooperation Code, PCC) on 6 September 2013 and re-approved in its revised form by the scienceindustries Board on 14 May 2020.

On the basis of the Sections 24.1, 25.1 and 25.2 PCC, the signatory companies disclose pecuniary benefits which they grant to healthcare professionals (HCP) or healthcare organisations (HCO) on their company websites which are open to the public. Only a few pecuniary benefits are exempt from this obligation of disclosure (Sections 2 and 24.3 PCC).

In connection with the organisation of events by the signatory companies themselves, questions arise in connection with the implementation of the PCC as to how, in this case, the pecuniary benefits are to be disclosed.

Recommendations**A. Persons who take an active part in events (consultants)****1. Fees for consultancy or services**

The pharmaceutical companies may instruct HCPs either in groups or individually to provide consultancy or services such as papers, chairing meetings, trainings or similar; the companies may pay appropriate compensation for expenditure incurred by the HCPs in this connection on the normal scale (see Section 21.2 PCC). All fees for consultancy or services are to be disclosed in compliance with the provisions of the EFPIA template (EFPIA Code of Practice, Annexe A). Disclosure must as a rule be made individually and may only relate in exceptional cases to a group if an individual allocation of the pecuniary benefit to a particular HCP is not possible or if the costs incurred were to be disproportionate (see Sections 25.1, 25.2, 25.4.3 and 25.5.1 PCC).

2. Travel and accommodation costs

The contributions paid by the pharmaceutical companies to the HCPs or groups of HCPs to defray travel and accommodation costs are to be disclosed according to the same principles. As a rule, the disclosure is to take place individually and may only relate to a group in exceptional cases if an individual apportionment of the pecuniary benefit to specific HCPs is not possible or if the costs incurred were to be disproportionate (see Section 25.4.2 PCC).

3. Subsistence costs

On the basis of Section 24.3.7 PCC there is no requirement for subsistence costs to be disclosed. Please note that the payment for meals (including beverages) is only permitted in the context of a technical discussion or in direct connection with an event, and that such payment must be reasonable, up to a maximum amount of 100 Swiss francs per HCP and meal (Section 15.4 PCC).

B. Persons who are passive attendees at events (visitors)

1. Attendance fees

Pecuniary benefits for HCPs or HCOs in connection with events are to be disclosed individually in accordance with the criteria of the EFPIA template and may only refer in exceptional cases to a group if an individual apportionment of the pecuniary benefit to particular HCPs is not possible or if the costs incurred were to be disproportionate (see Section 25.4.2 PCC). The requirements for the financial contributions according to Section 35 et seq. PC must be observed.

In the case of events which do not require overnight accommodation and which, without the inclusion of any meals, last for a maximum of half a working day following the technical part of the event, a contribution to costs may be waived (Section 35.3 PC). In the case of such events, often no participation fees are foreseen at all because the amount is usually negligible. Since the fees paid to consultants are already disclosed under their names, it is not necessary in these cases to disclose the negligible proportionate share of the room and technical costs of each listening HCP.

2. Travel and accommodation costs

The contributions made by pharmaceutical companies to the travel and accommodation costs of HCPs and HCOs are to be disclosed according to the same principles. As a rule, the disclosure is to be made individually and may only refer to a group in exceptional cases if an individual apportionment of the pecuniary benefit to particular HCPs is either impossible or if the costs incurred were to be disproportionate (see Section 25.4.2 PCC).

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Reminder: If consent is declined, depending on the decision of each company itself, a summarised disclosure may be made in compliance with the provisions of the EFPIA template. However, if consent is declined, companies are recommended to refrain from cooperation (see practical recommendation No. 1 to PCC).