Recommendations no. 3 to the Pharma Code

Professional promotion for pharmaceuticals: documents, references and comparisons

Initial situation

Sections 24.1 to 24.3 and 25 of the Pharma Code (PC - references and comparisons) often give rise to the same questions in practice:

- What is a “recognised scientific medium”?
- What kinds of publication are permitted as references?
- When has a document been “published”?
- How are references correctly cited?
- What does genuine reproduction of graphs, tables etc. from studies used in advertising materials mean?

Recommendations

Recognised scientific media

Scientific journals for medical professionals are recognised scientific media in which manuscripts (including reports on clinical trials) are published. The editors of such scientific journals check these manuscripts for compliance with international requirements (in technical jargon: "peer reviewed"). These requirements are formulated by the following international organisations:

- *International Committee of Medical Journal Editors (ICMJE)*[1]:"Recommendations for the Conduct, Reporting, Editing, and Publication of Scholarly Work in Medical Journals"[2];
- *World Association of Medical Editors (WAME)*[3]: "Policies for Medical Journal Editors, prepared by the WAME Ethics and Policy Committee"[4].

All journals captured in the MEDLINE database that can be searched on MEDLINE via PubMed are deemed to be scientifically recognised[5]. Plausible arguments for scientific recognition have to be submitted for other scientific journals. Here, the main criterion is that the manuscript has been subjected to a peer review process.

Scientific books are also recognised scientific media. Although books are seldom up to date, certain documents published in book form (e.g. therapeutic guidelines issued by medical associations) can serve as valid references over a longer period of time. Generally, several authors are responsible for the contents of a scientific book.

Websites can also be recognised scientific media. Data and information that can be important for the advertising of medicinal products are published on the websites of scientific associations, other organisations and institutions that are active in the areas relevant to the PC. Examples include national and international therapeutic guidelines. Such guidelines published on a website

[1] www.icmje.org/
[2] www.icmje.org/icmje-recommendations.pdf
[3] www.wame.org/
[4] www.wame.org/policies
[5] www.pubmed.ncbi.nlm.nih.gov/
* **PC**: Pharma Code; **PCC**: Pharma Cooperation Code

can be updated very quickly. Similar to the process for scientific publications, these documents have to be written by a group of recognised experts identified by name.

Kinds of publications that are permitted as references

All kinds of **scientific articles** published in a scientifically recognised medium are permitted as references, provided that they successfully passed a peer review process. This ensures that the referenced data and information are generally recognised. This rule does not apply extremely rarely and only if justifiable.

If these refer to **clinical trials**, these must have been carried out in accordance with the Good Clinical Practice (GCP) guidelines that were valid at the time of the trials. The cited clinical trial reports must reflect the current state of scientific knowledge.

An **editorial** - even one published in a scientifically recognised medium - usually does not pass through a peer review process and may therefore **not be used as a reference**. It is possible, however, for statements published in an editorial to be used to supplement a referenced publication (but Section 25.5 must be observed).

Abstracts are abridged forms of scientific investigations that can be submitted during scientific conferences and events. Although abstracts go through a peer review process, this process is not very strict. As a general rule, reference should always be made to the accepted abstract. It is acceptable to use additional data that can only be found in the supporting poster or oral presentation, provided that these additional data are mentioned comprehensibly in the reference and the referenced data are made available immediately on request to all market players by the relevant pharma company. The principle applies that the data derived from posters/oral presentations may not contradict the data in the abstract, but must be plausibly derived from these data.

The data provided in the abstracts are often "work in progress". Such results should be seen as preliminary findings which if necessary have to be revised during the rest of the process. This means that abstracts that are older than 24 months are no longer considered to be up to date and may not be used as references. The determining factor is the date on which the abstract was presented at the relevant scientific congress. The month and year of presentation of the abstract and the name of the scientific congress should be cited as the reference. Abstracts should essentially only be used until the final study is published. Abstracts, supporting posters and oral presentations can be published in printed, electronic or other forms.

Market data provide important information that is often used in advertising for medicinal products. According to Section 24.2 PC, statements made in professional promotion must be proven. However, as market data are seldom found in classic scientific publications, the Code Secretariat accepts a reference to market research data, for example, if the name of the company and the month/year in which the data were collected are cited.

Publication of documents as a condition for references

A document cited as reference for specific statements in professional promotion is deemed to have been published (i.e. made available to the public) if an informed and authorised person (e.g. a documentalist) can procure the document as a printed work in a scientific library. A document is also considered to have been published if it can be obtained in a database accessible via the internet, if necessary with the usual access rights (password protected access for subscribers to a scientific journal, etc.). It is not important from a scientific point of view whether the reference has been published in print or on the internet.

A document is considered to be an unpublished document if the reader of the professional promotion can only access the document with the help of the company responsible for this professional promotion. Section 25.4 PC applies to data in professional promotion that have *not yet* been published.

Market data are often not available to the public. The referenced data must therefore be provided immediately on request to all market players by the relevant pharma company.

Correct citation of references

References to scientific journals must be cited with the name and initials of the author (if there are several authors, only the name of the first author can be provided, followed by "et al."). The full title of the publication must be listed. The title of the publication gives a first indication of the scientific value of the reference and/or whether the reference is admissible. For example, a publication on pharmacokinetic data of a medicinal product is inappropriate to support clinical data of this medicinal product. The name or abbreviation of the scientific journal in which it was published must also be provided. The year or volume and page numbers are usually available for most scientific journals. For abstracts, the month and year of publication must be cited. Early publication in electronic format is by now a common practice. Here, the year, month and day, usually followed by a DOI number and [Epub ahead of print] in brackets are cited. This type of reference is permitted, but should be changed to the usual manner of citation once the details are available. This can be changed when the advertising materials are reprinted, for example. If a scientific journal is only published electronically, an e-number is provided instead of a page number (e.g. PloS One. 2017 Jul 20;12(7):e0181256), followed by a DOI number, if available. If there are any questions, it is a good idea to contact the PubMed website. This website also lists the generally accepted abbreviations for scientific journals.

References to scientific books must be cited with the name and initials of the author of the book or chapter (if there are several authors, only the name of the first author can be provided, followed by "et. al."), the full title of the book or chapter, the name of the publishing house, the edition and the ISBN number.

If websites are used as references it is very important to provide a clear link to the website as well as the date (month/year) on which the website was visited. The contents of websites (e.g. updates of guidelines) can change. The pharma company is responsible for ensuring that the data used as reference are still available at a later date.

Genuine reproduction of graphs, tables etc.

All graphs, illustrations, photographs and tables from published studies included in advertising material must clearly indicate the exact sources of the presentation and be reproduced true to the original in terms of content, unless minor adaptation or modification is unavoidable. Such adapted or modified representations should be accompanied by a note (e.g. modified according to XYZ). It is essential that the reproduction is not misleading. In the case of graphs, tables, etc. from scientific studies in which, for example, non-approved dosages are listed, these non-approved data and information should be omitted completely wherever possible. Here too, a note should be included stating that the graph has been modified. If such an adaptation is not possible, then, in addition to the note on the modification, the unauthorised data and information must also be clearly indicated.