

From: [REDACTED]
To: [Applications](#)
Subject: Submit Representation- case no. : AD/02NH
Date: Friday, May 10, 2019 3:05:14 PM

Dear Sir/Madam,

Sorry for the late reply.

7a, The distribution of Past Survey data (prior to its suspension in 2015) by the HKAPI was very limited. They only provided information to pharmaceutical companies for commercial uses. It was seldomly provided survey data to government, public bodies, academic institutions and healthcare professionals.

7b, We as one of the major service providers of healthcare industry, have ever been heard about they having a plan for publishing the Sales Survey Report for mentioned parties. We believe that HKAPI would distribute the Sales Survey Report for limited distribution under their internal policies.

8a, They do not say whether they would **charge** the different sectors for the survey data

8b, Yes, it can work out the estimated price of a drug **indirectly** if we know the no. of patients and dosages.

8c, the stated benefits are mainly for pharmaceutical companies. The benefit for the Government, academia and healthcare professionals would be very little.

8d, as 8c

8e, IMS can actually provide more information and data currently, The drawback is that IMS charges the requesters in high side. The proposal of publishing survey data by HKAPI may increase competition to counteract IMS.

9a, we do not intend to subscribe to the Sales Survey Report by HKAPI because IMS is more accessible and willing to share the information with non-pharmaceutical stakeholders.

9b, Again only benefit their members as whole.

10a, NA

10b, subscribe to IMS as it is more informative and more transparent and neutral. HKAPI is actually supported by the members of international pharmaceutical companies based in Hong Kong. They are working for members' benefits.

10c, IMS data should be more neutral as it is a third party instead of HKAPI is the same group of an industry.

10d, no obvious effect

11a, It is an advantage

11b, NO comment

12a, all sales data can actually lead to competition between pharmaceutical companies. It is good to have more transparency in drug prices for non-pharmaceutical company sectors.

12b, It does.

Kind Regards,



The Society of Hospital Pharmacists of HK