



TO THE MEMBERS OF SFEE

Chalandri, 9-1-2015

Re: Circular No 106329/15-12-2014 for Scientific Events

Honourable Members,

By means of this present letter, we would like to inform you that our Association has already addressed a **request for the suspension** of the application of the circular No 106329/15.12.2014 and a request for a meeting with the competent representatives of EOF, regarding the **severe omissions** and **infringements of law** of the new Circular regarding the organization of scientific events.

To begin with, we point out that the preceding circular (64740/2013), which has been transposed into the Code of Ethics of SFEE and has been approved and ratified by the European Association EFPIA, is now a fixed practice of the market for a long period of time, thus any deviation therefrom, creates confusion both in the Greek as well as in the European market. We, as an Association, observe and strictly apply the provisions of the Code of Ethics of SFEE, which supersedes, since it is a product of self-regulation.

As regards the contents of the circular, it is observed, suggestively and not restrictively, that the *seasonality criterion* is omitted, a criterion which has been set among others, for cost retention, that the limits at the sponsorship amounts per each type of scientific event are omitted (e.g. up to €2,500, €10,000, €20,000 and so forth), limits that had been set in the preceding circular No 64740/2013 etc. It is obvious that the abolishment of these limits favours the creation of conditions of unfair competition. It is also observed that the enactment of a limit to the number of participation in conferences held in Greece has been omitted (up to 5 Healthcare Professionals (HCPs) per year) and conferences held abroad (up to 3 HCPs per year), the enactment of a limit in the number of the HCPs participating in conferences held abroad (up to 30 HCPs in Europe and 10 HCPs in America per

Pharmaceutical Company), the accommodation limits are unjustifiably increased from €140 VAT included, in Greece for staying overnight and €70 plus VAT for meals, to €250 plus VAT (staying overnight and meal) and from €250 not including VAT abroad and €70 not including VAT for meal, to €400 not including VAT (staying overnight and meal), amounts which are unjustifiably high, mainly for Europe, given the scientific/professional character of the participation. The presence of accompanying escorts is not prohibited, only the cover of their costs by Pharmaceutical Companies and there are many other series in our opinion, omissions and deviations.

Furthermore, no reference is made to the fact that an event must be held in the appropriate conference hall. Instead, there is only a general reference that the selection of the place must be "thorough", leaving room for violations in favour of entertainment practices. Staying overnight is not permitted for type C Events. Pharmaceutical Companies must cover in conferences held abroad, the cost of residents who will constitute 10% of the total number of the HCPs the companies finance (there is no reference as to whether this applies only for conferences held in Europe or for all conferences held abroad). HCPs are permitted to participate in "*consulting committees*" for medicinal products and therapies, which take place in Greece or abroad and are organized by Pharmaceutical Companies, with or without remuneration, provided that they have obtained the relevant license from their supervising Agency. The training leave of the HCP that was granted by its employer is abolished in the new circular (consequently, the special participation form). The review of the cost of the event will be performed by the PCO and not the Scientific Agency in charge. The payment of honorarium by the companies/sponsors is permitted to the spokesmen or chairmen of meetings in scientific events type A, B, C and D, in accordance with the terms set out in Section (K) of this circular (new circular in force, article VI, par. 11, page 14), without reference to the new article 36 of Law 4272/2014.

In view of the above, series issues for violations of the law are raised, including, but not limited to, the case of honorarium of physicians, where according to article 36 of Law 4272/2014, they are only permitted in scientific events type A and B, while they are expressly prohibited events type C and according to the circular, they seem to be permitted in any type of scientific event (A, B, C and D). It is

prohibited to organize in Greece type D Events by foreign scientific agencies, a fact that directly opposes the general principles of EC law for free provision of services, promotion of education, scientific information and freedom of expression. By omitting the upper limit of physicians entitled to participate, in conjunction with the omission to grant training leave to NHS physicians, a serious expenditure encumbers the State Budget and the NHS faces severe operational problems (in the case of NHS physicians) at the expense of the Greek Patients. It enacts, in violation of the provisions of the Civil Code the contractor (PCO) as accountable for the review of the project, while the project's owner who is scientifically in charge should be held accountable (the scientific society), who is also the agency approved by EOF, while the contractor is held accountable against the project's owner for other violations for which we reserve.

We point out that three meetings had already been held - before the issue of the circular - with the President of EOF and the competent persons of PEF and the conferences committee of EOF, in which we had agreed upon further improvements of the preceding circular, in favour of transparency and in no case the changes that we saw later in the new circular had been presented to us, which also led to today's difficult circumstances.

Consequently, we expect from EOF the prompt suspension of the application of the Circular No 106329/15.12.2014 and the scheduling of a new meeting for coordination of our efforts against the above omissions and violations of law, in order to restore the order in everything we currently know and apply, while speaking for our Association, SFEE's Code of Ethics shall supersede and apply.

Yours sincerely,

For SFEE

Michael Chimonas

General Manager

Markos Gerassopoulos

Vice President of SFEE

Responsible for issues concerning the
Code of Conduct