Country Code Update on Germany - Questions & Answers
August 13, 2019
Facilitated by IPCAA

Q: With regard to hospitality for in-house training events and work lunches/dinners, am I correct in assuming that you are referring to non-contracted engagements only? (e.g. not for advisory board)
A: Advisory Boards are considered internal meetings in general.

Q: Do you expect more requirements to come from EFPIA?
A: Yes. E.g for Patient Representatives as the new EFPIA Code will expand the current ban on gifts for HCPs to this group either.

Q: According to the recent EFPIA Codes Consolidation, the location will also be a relevant requirement in Germany to assess the feasibility of a sponsoring. How will this affect a Third-Party congress?
A: Even the assessment of venues for Third Party congress is currently an issue in Germany. The new EFPIA Code will add the location of such events as a further requirement. This will probably lead to more issue when it comes to the national implementation. The assessment depends on each case. However, Cities such as Berlin and Munich won't be affected in most of the scenarios.

Q: Is there any FSA-guidance on accommodation limits for German HCPs?
A: Hotels must be modest. Location must be reasonable – meaning no big spa, no fancy places. There is no specific value limit. If there is no overnight stay involved, this may be less rigid, as HCPs would not be exposed to, for example, a spa.

Q: Can a company support an HCP for the full duration of a congress, even if their speaker engagement is just for two days?
A: Theoretically yes, as HCPs who are not engaged as speakers can also be funded for the entire duration of the congress.

Q: Are the allowances included in the EFPIA chart mentioned in the respective country codes?
A: The chart is official EFPIA information published on their website. The local country association must set their meal limit, and this should in turn be published in the country code of practice or in an addendum linked to this. If the National Association fails to set a limit, EFPIA reserve the right to intercede and apply a value.