

COMPLAINANT v SYRIMED**Allegations about a company website and a video****CASE SUMMARY**

This case was in relation to the “Products” webpage on the global website of SyriMed, which was alleged to be promotional. The complainant alleged that the website contained a list of SyriMed products and product claims (in some cases an indication), thus requiring prescribing information and an adverse event reporting statement. It was further alleged that its Facebook page contained a video of a promotional exhibition stand and that this post was not certified.

The outcome under the 2021 Code was:

No Breach of Clause 2	Requirement that activities or materials must not bring discredit upon, or reduce confidence in, the pharmaceutical industry
No Breach of Clause 5.1	Requirement to maintain high standards at all times
No Breach of Clause 8.1	Requirement to certify promotional material
No Breach of Clause 12.1	Requirement to include up-to-date prescribing information
No Breach of Clause 12.9	Requirement that all promotional material must include the prominent adverse event statement
No Breach of Clause 16.1	Requirement that promotional material about prescription only medicines directed to a UK audience which is provided on the internet must comply with all relevant requirements of the Code

**This summary is not intended to be read in isolation.
For full details, please see the full case report below.**

FULL CASE REPORT

A complaint about SyriMed was received from an anonymous, non-contactable complainant.

COMPLAINT

The complaint wording is reproduced below with some typographical errors corrected:

“The company website lists its products and a promotional claim (an indication in some cases). for example, Clonidine Anti migraine, aciclovir antiviral, dypridamole, anti

thrombotic etc. The website is not gated and there were no disclaimers to prevent patients from accessing the content. I also note prescribing information is missing on this page and no AE reporting is available. The website link can be found here [URL provided] Secondly, their Facebook page Thame Laboratories which the company was previously known as, includes a video of a promotional exhibition stand. promotional content can be seen displayed on the table and their products displayed on a stand where the name of the product is clearly visible. There is no suggestion that this post was certified by the company.”

When writing to SyriMed, the PMCPA asked it to consider the requirements of Clauses 8.1, 12.1, 12.9, 16.1, 5.1 and 2 of the 2021 Code.

SYRIMED’S RESPONSE

The response from SyriMed is reproduced below:

“We write in response to the above complaint. The complaint is in two parts and we respond separately to each below.

Background

Syri Limited is a UK-based pharmaceutical company. It operates under the trading name Syrimed. Syri Limited engages in a broad spectrum of commercial activities worldwide. Among these activities is the sale of product registration dossiers to third-party pharmaceutical companies outside of the UK.

Complaint – Webpage

The complaint presented was: The company website lists its products and a promotional claim (an indication in some cases). For example, Clonidine Anti migraine, aciclovir antiviral, dipyridamole, anti-thrombotic etc. The website is not gated and there were no disclaimers to prevent patients from accessing the content. I also note prescribing information is missing on this page and no AE reporting is available. The website link can be found here [URL provided]

Company response – Webpage

Global Audience

The webpage in question, [URL provided], is not a promotional site. This is the company's global corporate site and is not intended for UK-based healthcare professionals or members of the public. The audience is defined at the top of the webpage with clear signposting for others.

If this webpage is accessed by UK based healthcare professionals, they are redirected to the UK website [URL provided]. The clearly defined target audience are potential business partners and commercial pharmaceutical organisations who may be interested in purchasing or licensing our registration dossiers. This position is supported by the clear statement: *“Below you can find our full list of dossiers. If you are interested in out-licensing our dossiers, or distribution, please contact our Business Development Team.”*

Redirection for UK health professional gated webpage

UK healthcare professionals are directed to use the [URL provided] website to access information regarding products. This is clear from the wording which is positioned prominently at the top of the webpage *"If you are a UK healthcare professional you can access product information on your local Syrimed website"*. This link directs users to [URL provided], a gated website that includes comprehensive prescribing information, legal status, NHS pricing, and other pertinent details for UK professionals.

Please see screenshot below of the webpage and highlighted, the relevant sections from [URL provided].

The webpage in question does not promote products to UK healthcare professionals; accordingly, prescribing information and AE reporting messages are not required on this page. Therefore, Syri does not believe this webpage breaches the ABPI code.

The language used on this page is specific to the pharmaceutical industry and is not intended for healthcare professionals, patients, or the public.

Alleged promotional claims

Syri did not make any promotional claims on this webpage. The therapeutic areas listed are not promotional claims. Terms such as "Antimigraine," "Antiviral," "Antithrombotic," etc., listed under the "Therapy Area" heading, are not promotional claims. They describe the specific therapeutic area for which the dossier was developed. For example, "Clonidine" is developed for the prophylactic management of migraines, among other uses, so the term "Antimigraine" indicates the dossier's therapeutic focus. It does not list uses, which are not included in the dossier.

Conclusion

In conclusion, the webpage is clearly not intended for UK healthcare professionals or the general public. Any UK healthcare professional who accesses this page are promptly redirected to the appropriate gated site with all necessary prescribing information and legal disclaimers. Therefore, Syri Limited does not believe the ABPI code has been breached with this webpage.

Complaint: Facebook Page: Thame Laboratories

The second part of the complaint is: their Facebook page Thame Laboratories which the company was previously known as, includes a video of a promotional exhibition stand. Promotional content can be seen displayed on the table and their products displayed on a stand where the name of the product is clearly visible. There is no suggestion that this post was certified by the company.

Company response – Facebook

The Facebook account in question was created and managed by an ex-employee. The controls and administration of this account were not handed over when they left. We do not have access to this account but our IT team are working with Facebook to gain access.

We are unable to see the video described in the complaint. We request that you share the link to this video so that we can provide you with our comprehensive response. We commit to provide you with our response promptly once the requested information is provided to us.

Response to Clauses Cited

The PMCPA has requested that when responding to this complaint Syri should bear in mind the requirements of Clauses 8.1, 12.1, 12.9, 16.1, 5.1 and 2 of the 2021 Code.

Clause	Response
8.1	Syri Limited confirms that the webpage in question, along with the entire website, was reviewed and certified by a company signatory who is a UK-registered pharmacist.
12.1	The webpage in question is part of a corporate website intended specifically for international pharmaceutical companies interested in acquiring registration dossiers. This page is not designed for UK healthcare professionals or the general public. UK healthcare professionals visiting the page are immediately directed to a UK-specific website ([URL provided]).
12.9	The audience of this webpage will not have a requirement to report AE, those who may have this requirement are signposted and redirected on accessing the page.
16.1	The webpage in question is not intended to promote prescription medicines to UK healthcare professionals.
5.1	Syri does not believe this clause has been breached as high standards were maintained. UK healthcare professionals are signposted to use the [URL provided] website for information on products. The language used also makes it clear that this page is intended for potential business partners.
2	Syri Limited does not believe that the webpage brings discredit upon or reduces confidence in the pharmaceutical industry. The page is specifically designed for an international audience of pharmaceutical companies and distributors; and not UK healthcare professionals. A separate website is available to access for UK healthcare professionals and this is clearly stated at the top of the concerned page.

As requested by the PMCPA, we are providing with this response a print out of the webpage that was the subject of the complaint.”

Extracts of SyriMed’s further responses are reproduced below:

“As we are unable to view the video in question, we are unable to provide any response.”

“Please see answers to your questions below:

1. When did the ex-employee who managed the Thame Laboratories Facebook account cease employment?

The ex-employee ceased employment in December 2021.

2. How many followers does the Facebook account have?

The Facebook account currently has 363 followers.

3. Is the account private or public?

The account is public.

4. What is the status of the followers of the account i.e. are they patients/members of the public/health professionals etc.

It is not possible to determine the status of all followers of this account as the page states, ‘Thame Laboratories’s list of followers is unavailable.’ (Please see screenshot below.”

5. When will SyriMed gain access to the Thame Laboratories Facebook account?

SyriMed gained access to this account on 2nd September 2024.

6. Once access is obtained, please inform the PMCPA whether there is a video posted on the Facebook page that matches the description as provided by the complainant, and its status: is the video, if present, in a public or private post?

There are no videos on this Facebook page. The four posts on this Facebook page contain images that are non-promotional; no promotional claims are made and no products are mentioned or visible on this page.”

PANEL RULING

This case related to the “Products” webpage on the global website of SyriMed, which was alleged to be promotional. It was further alleged that its Facebook page contained a video of a promotional exhibition stand and that this post was not certified.

Global website

SyriMed submitted that the webpage at issue was not promotional and was part of its global corporate website, not intended for health professionals or members of the public in the UK. Among SyriMed’s activities was the sale of product registration dossiers to third-party pharmaceutical companies outside of the UK. According to SyriMed, the website was aimed at potential business partners and commercial pharmaceutical organisations who may be interested in purchasing or licensing registration dossiers. The Panel was provided with a screenshot of the webpage complained about and did not have sight of the full website such as the homepage or any other preceding webpages.

The Panel observed that the webpage complained about was titled “Products A-Z” which appeared at the top of the ‘Products’ page under a list of other webpages such as Home, About us, Partnership, Pharmacovigilance, Careers, and Contact us. Two further lines of text directing the audience away from the page appeared under the title:

“If you are a UK healthcare professional you can access product information on your local SyriMed website [hyperlinked]

Below you can find our full list of dossiers. If you are interested in out-licensing our dossiers, or distribution please contact our Business Development Team [hyperlinked]”

The first of the hyperlinks took the user to a gated website for UK health professionals with additional information about the product.

The remainder of the webpage at issue contained a table listing 66 medicinal products alphabetically (detailing the non-proprietary name, strength and formulation) in the ‘Dossiers’ column, with an adjacent column headed ‘Therapy Area’.

The Panel noted the broad definition of promotion, and that the mention of a medicine and its indication together would most likely be considered promotional. Mention of a therapy area might also be considered promotional when used alongside the name of a medicine and each case would be decided on the facts of the case.

The Panel noted the wording used in the table under ‘Therapy area’ included ‘antimigraine’, ‘antiviral’ and ‘anti-thrombotic’, as cited by the complainant, along with broader terminology such as ‘cardiovascular’, ‘central nervous system’ and ‘endocrinology’.

SyriMed submitted that the therapeutic areas were not promotional claims but described the specific therapeutic area for which the product was developed, that these were descriptions of the dossier’s therapeutic focus and not a list of all the product’s uses; clonidine, for example, was developed for the prophylactic management of migraines, among other uses, and the term antimigraine indicated the dossier’s therapeutic focus.

The Panel took account of the overall context. The content of the webpage in question included clear signposting for UK health professionals along with a statement that the list comprised dossiers for those interested in out-licensing or distribution. In the Panel’s view, the webpage was indicative of a corporate or business-to-business webpage, and appeared to be a product listing. While the Panel considered some terms listed under therapy area appeared closer to indications compared to others, such as antimigraine or anti-thrombotic, it did not have the full licensed indication(s) of each medicine before it. The webpage and table itself contained no further information or claims.

On the evidence before it, and in the absence of any preceding pages, the Panel did not consider the complainant had discharged his/her burden of proof that the information provided on the Products webpage constituted promotion. On that basis, the requirements relating to prescribing information and an adverse event reporting statement did not apply and the Panel ruled **no breach of Clause 12.1 and 12.9**.

With regard to the allegations that the website was “not gated and there were no disclaimers to prevent patients from accessing the content”, the Panel noted Clause 16.1 related to promotional materials about prescription only medicines directed to a UK audience. As the webpage had not been established as promotional above, Clause 16.1 did not apply. The Panel therefore ruled **no breach of Clause 16.1**.

Facebook page

The complaint also related to a Facebook page which was alleged to include a video of a promotional exhibition stand in which promotional content was displayed on the table as well as the product name being visible. The complainant alleged that the post had not been certified.

SyriMed submitted that the public Facebook account was created and managed by an ex-employee who left the company in December 2021 and had not handed over control of the account on their departure. SyriMed gained access to the Facebook account during the case preparation stage of this complaint and provided screenshots of the four posts made on the Facebook page which dated between 26 November 2018 and 23 December 2018.

The Panel observed that of the four posts which appeared in the screenshots provided, none appeared to be videos, nor did they relate to an exhibition stand or any product. The Panel noted that it had not been provided with any further details by the complainant, who could not be contacted for further information, such as the date on which the video was posted to the Facebook page, or any screenshots to support the allegation. The Panel noted that the complainant bore the burden of proof and it was not for the Panel to make out the complaint. The Panel considered that the complainant had not established their case on the balance of probabilities and therefore ruled **no breach of Clause 8.1**.

On the basis of the Panel's findings above, the Panel had no evidence to suggest the company had failed to maintain high standards or brought discredit on the industry. The Panel ruled **no breach of Clauses 5.1 and 2**.

Complaint received 30 July 2024

Case completed 09 September 2025