

5. The material is not associated in any way with a promotional campaign for any drug product by the pharmaceutical firm supporting the exhibit. The material may contain reference to support by a pharmaceutical firm.

These tests, let me stress, were intended to permit truly independently prepared educational materials which do not have an overall promotional message to be distributed by drug manufacturers. When we were asked about scientific exhibits, we suggested essentially the same criteria.

We are currently drafting an extensive revision of our drug advertising and labeling regulations, and we expect to include guidelines such as those noted above in these proposed regulations. We are concerned that both the American Medical Association and the Pharmaceutical Manufacturers Association believe that these criteria would virtually eliminate scientific exhibits and industry-sponsored symposia. These regulations could thus have an enormous impact on post-graduate medical communication and we would not take such a step lightly. We expect extensive comment on these regulations and will consider such comments carefully. At the same time, the extensive influence of the drug industry in these educational media is well illustrated by the profound effect our suggested guidelines could have.