Such a case occurred in 1964 in connection with the MAO-inhibitor transleypromine, or 'Parnate', a drug for the relief of depression, which was also a component in the combination products, 'Parstelin' and 'Parstelin S-2'.

The Food and Drug Directorate considered that these products should be withdrawn from retail distribution, and their sale be restricted to hospitals and similar institutions. Subsequently, the total withdrawal of 'Parstelin' was decided on, but 'Parnate' was allowed back on the market with specific labelling and other restrictions.

The following is an outline of the action taken by the company:

- 1. We telephoned our wholesale distributors informing them of the FDD decision, asking them to embargo their inventories, and ship them immediately, freight collect, back to SK&F in Montreal. We informed them that a letter would follow dealing with returns from retail stores, which were to be credited according to the normal SK&F policy.
- 2. This announced letter was followed by a second letter reporting on the progress of the withdrawal, and setting a cut-off date for returns.

— 29 —

- 3. Two letters were sent to all physicians drawing the FDD decision to their attention.
 - 4. Two letters were also sent to all retail pharmacists, enclosing and enlarging on the letters to physicians.
- 5. A special letter was sent to all hospital pharmacists.
- 6. Our representatives were instructed to telephone or see personally all the physicians who they normally detailed to bring them up to date with the situation.

We believe that only a well-organized marketing department could have carried out this problem with speed and efficiency. Essential contacts were all made and letters mailed within three days of the decision to recall the product. Happily, this is not the kind of situation which occurs frequently. But any responsible pharmaceutical company should be able to recall a product promptly at the request or requirement of the Food and Drug Directorate. We included this within the conditions laid down when we granted a voluntary licence for our major tranquilizer, trifluoperazine, and have recommended to the Commissioner of Patents that it should be a condition of any compulsory licence.

Pharmaceutical companies use a variety of informational and promotional media and techniques. The balance between them can vary significantly from

— 30 **—**

company to company, and from product to product. Our own company, for instance, tends to place its emphasis rather differently to most of our competitors. We are, for instance, the fifth company in sales in Canada, but only 23rd in the size of the detailing force. On the other hand, we have, we believe, a rather strong Market Research Department, and we employ more direct mail than do most other companies.

Visits by service representatives and direct mail advertising constitute the two major activities directed to obtaining medical acceptance of pharmaceutical