PROPOSED LEGISLATIVE AMENDMENT:
SUBSTANTIVE SEARCH AND EXAMINATION OF PATENT APPLICATIONS

SUBMISSION

by

Innovative Pharmaceutical Association of South Africa (IPASA)

FOCUS ON ISSUES RELEVANT TO THE PHARMACEUTICAL INDUSTRY

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1. PRELIMINARY REMARKS

A Roundtable Discussion was arranged on 9 February 2015 by the Department of Trade and Industry (**the dti**) and the Companies and Intellectual Property Commission (CIPC) to consider and discuss the implementation within the South African Patent Office, as part of the procedure for the registration of patents, of a system of Substantive Search and Examination (SSE) with respect to patent applications. The session was attended by approximately 30 stakeholders and Government representatives; the Innovative Pharmaceutical Association of SA (IPASA) was also invited to attend and was represented by its Chief Executive Officer, Dr Konji Sebati. In addition, some IPASA company representatives were also present.

IPASA is a trade association that represents leading global pharmaceutical research and biotechnology companies that are devoted to inventing medicines that allow patients to live longer, healthier, and more productive lives. With nearly $50 billion invested in R&D worldwide in 2013,[1] and more than 300 new medicines have been approved in the last decade, our members are world leaders in medical research.[2] IPASA represents a full spectrum of biopharmaceutical companies, ranging from large, global companies to smaller companies, all of which make valuable contributions to the health of patients and the global economy.

At the Roundtable Discussion attendees were informed that the decision had been made to introduce substantive search and examination (SSE) of patent applications. IPASA has previously commented on the merits and demerits of the IP Policy separately. It is IPASA's understanding that the CIPC is seeking commentary specifically on the models of SSE and associated implementation variables. For the purposes of this submission, IPASA's comments will be limited to this aspect of the IP Policy. [3]

The decision to implement the SSE system was made on the basis of arguments submitted by various interest groups to the effect that enhanced industrialisation in South Africa cannot be achieved without a strong patent system, and this in turn cannot be ensured without an SSE procedure. It has

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[1] Pharmaceutical Research and Manufacturers of America. "IPASA Annual Membership Survey." 1981–2013.

[2] Battelle Technology Partnership Practice. Growth Platform for Economies Around the World. Battelle Memorial Institute, J May 2012. Prepared for the Pharmaceutical Research and Manufacturers of America.

[3] IPASA reserves the right to provide further comments hereon and the broader issues pertaining to the National IP Policy.

also been argued that South Africa currently cannot provide reliable information regarding patents and technology, since no reliable assessment system is in place to guarantee the merit of granted patents. Therefore, the Roundtable Discussion was convened to consider and discuss the best and most effective model to be selected and used for an SSE system in the context of the South African patent dispensation.

IPASA and its members support the development of a substantive search and examination system, which will result in the issuance of stronger patents than those issued under the current registration system. However, the pre-requisite for a sustained, effective, and efficient SSE system requires investment in building this infrastructure; capacity building that includes adequate and appropriately trained human resources, with required administrative, technical skills, and appropriate intellectual property regulatory infrastructure to avoid a backlog and ensure that the entire system runs effectively and efficiently.

The comments of IPASA and its members are set out below.

2. PRESENTATION ON SUBSTANTIVE SEARCH AND EXAMINATION (SSE)

2.1 Outlining the relevant factors and considerations

The presentation emphasised that the enhancement of innovation was a key factor for economic development, and that one way of building innovation capacity was to ensure that 'strong patents with proven validity' were granted, patents that comply with 'all criteria for patentability'. It was also emphasised that an SSE system would contribute to the strengthening the quality of the IP system since patents would be subjected to a more rigorous registration process. At present the Patents Act and Regulations only require formal examination of patent applications, and there is no provision for pre- or post-grant opposition. A statement was made that the result of the lack of substantive examination and the absence of opposition proceedings was the granting of 'invalid' patents, including patents for inventions with only 'marginal inventive steps', thereby permitting the 'blocking' of the relevant market sectors by powerful companies.

It was further stated that, in the absence of an SSE procedure, the 'filtering function' to prevent the granting of invalid patents has been transferred to the Courts (to be decided by way of revocation proceedings brought by interested persons). It was pointed out that this causes delays and is costly to the interested person who has to act as the applicant/objector in order to challenge the validity of a patent.

Comments by IPASA

IPASA does not agree with the perception that all South African patents are not 'strong'. IPASA also does not believe that many South African patents are 'invalid' and that the inventions covered by many patents only entail 'marginal inventive steps'. Patent applications filed are often based on corresponding applications filed in examining countries, where the inventions are indeed critically assessed to determine whether they entail the required level of inventiveness.

The term erroneous "ever greening" is raised in respect of those pharmaceutical patents that are considered to be incremental innovations over the basic molecule or compound or process for a pharmaceutical product and its manufacture. These relate to new crystalline forms, advances based upon an existing process and new formulations as well as new indications.

Allegations pertaining to "ever greening" are therefore unfounded, as patents cannot be extended under the current rules. A patent lasts for a maximum period of 20 years, even though in actual fact no company effectively gets 20 years in SA due to the regulatory delays. After that time, a drug goes into the public domain and competitors are free to copy and financially benefit from the sale of the copied drug.

Often, within that 20-year period, the company that holds the patent will continue to discover a better way to make the medicine, or a new way of delivering it, or paediatric formulations, and so on. The innovator company is therefore entitled to file an entirely new patent application based on this new invention or process, which is, in fact, a novel invention and meets the requirements for inventiveness. The grant of a patent on the improvement of the original medicine does not, and cannot, have any impact on the expiry date of the patent granted on the original medicine, and therefore does not, and cannot, have any impact on the date at which the original medicine becomes available for generic approval. Contrary to the common misconception of "ever greening", the patent term of the original medicine is wholly independent of the term of any patent that might be granted in respect of an improvement or other incremental innovation based on the original medicine.

With regard to the reference to the 'filtering function' of the Courts, IPASA wishes to stress that the judicial process and an ultimate decision by a recognised Court to determine the issue of the validity of a patent, including the inventive merit of the invention covered, in fact adds to the credibility of the finding. However, this does not mean that a preliminary assessment of the validity would not be useful, ie by way of an SSE procedure and/or by way of a pre-grant or post-grant opposition procedure.

It is not quite clear on what basis the decision of an examining official would be regarded as a guarantee of the validity or otherwise of a patent, rather than a decision by a Court. It is envisaged that the decision by the examining official will in any event be subject to appeal to a Court of law (see paragraph 2.3 below). Furthermore, since an SSE procedure would entail research and assessment by the examining official, with (it is presumed) an opportunity for the applicant to respond to the objections raised, there will also be cost and time delay implications.

2.2 **Outlining the possible scenarios**

The Companies and Intellectual Property Commission (CIPC) has performed preliminary research and has identified five possible future scenarios for the introduction of an SSE system:

- a full examination procedure in all cases;
- a validation or re-registration system;
- outsourcing or sub-contracting the SSE function;
- the partial recognition of work done by other agencies;
- a mixed/hybrid system (full SSE only for certain sectors; another system for other sectors).

Certain considerations and/or criteria were taken into account:

- needs of the domestic economic and industry sectors;
- access of domestic applicants to quality examination;
- budgetary concerns;
- alignment with international systems;
- balancing the rights of inventors/creators and consumers/researchers.

2.3 **Outlining the five possible models**

By means of a comparative table the five possible SSE models were outlined as follows:

2.3.1 Full search and examination –

- applicant to apply and pay for a search within certain time period;
- applicant to request examination within certain period;
- provision for opposition to grant before official (outside of court);
- appeal from opposition to court, or revocation before court.

2.3.2 Validation/re-registration –

- validation of search done by recognised searching authority in other country;
- foreign applicants to provide outcome of examination in other country;
- opposition proceedings optional; revocation proceedings before registrar;
- appeal from decision/opposition/revocation to court.

2.3.3 Outsourcing/sub-contracting –

- another entity is contracted to do search;
- another entity is contracted to do examination;
- opposition and revocation proceedings to be outsourced;
- appeal to court from decision/opposition/revocation.

2.3.4 Partial recognition/work sharing system –

- search by recognised authority, partially validated/utilised and supplemented by local search;
- use/build on examination by other country office;
- opposition/revocation provisions optional;
- appeal to court on decision/opposition/revocation.

2.3.5 Mixed/hybrid system –

- full search in certain sectors, outsourced or locally done;
- examination in certain sectors selected for economic relevance;
- provision for opposition where examination done; not clear on revocation;
- appeal to court on decision/opposition/revocation.

Comments by IPASA

*IPASA commends **the dti**/CIPC for the extensive research done and for the comprehensive information provided and the full explanation of the different possible models for the planned SSE procedure to be implemented.*

2.4 **Outlining the CIPC proposed SSE model**

2.4.1 After outlining the five different SSE models, CIPC then indicated that it has selected a preferred SSE model for implementation. It was not quite clear whether the intention was for stakeholders to consider the selection and, if this was deemed preferable, to recommend an alternative model, or whether the selection was a final decision.

The selected model is in fact a combination of the last two systems (2.3.4 partial recognition with work sharing, and 2.3.5 mixed / hybrid system with search and examination for certain fields. Although there may be some lack of clarity, IPASA's understanding is that the ultimate model would be a composite model entailing the following features:

- a hybrid system will be used for the actual examination, namely a full SSE in respect of domestic applications; and for foreign applications, the partial recognition of the examination outcomes in respect of corresponding applications in other countries, if necessary coupled to a local searching and assessment process;
    - for domestic applications, a full SSE will be performed by CIPC in the selected technology fields;
    - for foreign applications, the search done by a recognised search authority in another country will be recognised, but supplementary searches may be done through national patent documents and in selected foreign jurisdictions; the examination report issued by the other country will have to be submitted by the patent applicant, but the final decision on patentability will be taken by the CIPC (based on relevant

findings in local searches and on decisions regarding patentability/validity by South African courts);

- the SSE system will initially be restricted to certain selected technology sectors, the selection of technology sectors being made on the basis of the South African economy;
    - certain technology fields are proposed for the implementation of SSE; these have been selected on the basis of research done by different interest groups, and on research done in respect of patents by foreign pharmaceutical companies.

Comments by IPASA

IPASA supports the selection of the combination of the partial recognition with work sharing, and mixed / hybrid system with search and examination for certain fields *as outlined. IPASA confirms that the SSE model selected (albeit only a provisional selection) would be suitable for South Africa, by differentiating between domestic applications (which may not have been assessed) and foreign applications (which may have been assessed in another examining country). The selected model is therefore supported by IPASA.*

IPASA submits that, although the differentiation between domestic and foreign applications in the application of the SSE system may be viewed as discriminatory, the fact that both categories of applications will ultimately be assessed by way of an SSE procedure could be relied on to address any perception of discrimination.

IPASA wishes to point out that the Patents Act, 1978 already provides (s. 43(4)) for search reports issued in another country in respect of a corresponding application in such country, to be disclosed by the patent holder after a period of five years has elapsed. In the case of the proposed SSE procedure in respect of foreign applications, the disclosure of such a search and examination report will in future take place at the time when the registerability of an application is being considered by CIPC.

On the proposal to implement the SSE system initially for selected technology fields, this could be viewed as being discriminatory treatment of one technology sector over another, and this would also be contrary to South Africa's international obligations under TRIPS Article 27.1 that provides as follows:

> *'Subject to the provisions of paragraphs 2 and 3, patents shall be available for any inventions, whether products or processes, in all fields of technology, provided that they are new, involve an inventive step and are capable of industrial application. Subject to paragraph 4 of Article 65, paragraph 8 of Article 70 and paragraph 3 of this Article,* ***patents shall be available and patent rights enjoyable without discrimination as to the place of invention, the field of technology and whether products are imported or locally produced.'***

IPASA submits that an SSE system covering patent applications in all technology sectors would be seen as being fair and non-discriminatory and would therefore be preferred. However, if a

sufficiently wide selection of fields of technology is made (covering various industry sectors), and if appropriate and reliable criteria are used for purposes of the selection (such as statistical information based on the patent filings in South Africa), the perception of discrimination could be addressed, if this is challenged.

2.4.2 A number of technology fields have been identified for the initial implementation of the SSE system, based on the International Patent Classification and taking into account the numbers of annual filings in South Africa within the different classes. It was made clear that the list of technology fields was only an initial proposal to provide a basis for further discussion with stakeholders. This is understood to mean that stakeholders would in future be invited to make further submissions and proposals in regard to the fields of technology to be selected for the implementation and conduct of the SSE system.

Comments by IPASA

Only some of the topics covered by the selected classes and sub-classes would be relevant to the pharmaceutical industry.

IPASA strongly urges CIPC to adopt transparent criteria for the selection of the fields of technology and clearly lay out the process for engaging with stakeholders in making those selections. If South Africa is to engage in a selection process for certain technology sectors, IPASA would recommend a process that balances the existing resources vs. capacity that needs to be built in the future.

2.5 **The Preferred IPASA SSE Model - The Singapore 2014 SSE system** *(attached as Appendix 1)*

IPASA members suggest that South Africa consider adopting an approach like that implemented by Singapore. This SSE model is one which IPASA believes could serve as an important system for SA to learn from and to implement in a transitional phase.

In 2014, Singapore replaced its "self-assessment" (registration) system with a "positive grant system". In the new system a patent application can only proceed to grant if Singapore's patent office concluded that it fulfils all patentability requirements as to novelty, inventive step and industrial applicability.[4]

Singapore allows applicants to choose between several routes of examination:

a. *requesting search and examination by the Singapore patent office, or*
b. *relying on the Search Report of a corresponding application with examination by the Singapore patent office; or*
c. *relying on the final Search and Examination Report from an approved examination*

[4] See, http://www.margaretlaw.com.sg/Article%20-%20Changes%20to%20Patent%20Law%20in%20Singapore.pdf, at 1-2; and http://baldwins.com/singaporean-patent-system-upheaval-imminent/.

authority with supplemental examination by the Singapore patent office.[5]

By providing all applicants with the same processing options, as Singapore has done, South Africa could avoid discrimination concerns and achieve its goal of implementing substantive search and examination, and also assist to alleviate an immediate overwhelming backlog of patent applications following the institution of the SSE process.

The Singapore system was designed to take into account the country's evolving international patent capabilities and to bring it on par with established patent offices, such as the UK Intellectual Property Office, the United States Patent and Trademark Office, the Japan Patent Office and the European Patent Office, and a few other smaller but highly efficient and specialised patent offices. This should also be the goal of South Africa's system.

2.6 **Outlining the implementation plan**

It was stated by CIPC that the implementation of the SSE model would be fast-tracked. To achieve this, CIPC will appoint 20 patent searchers in the 2015/2016 financial year. By the time that the necessary amendments to the relevant legislation (primarily the Patents Act and Regulations) have been enacted and promulgated, it is envisaged that these patent searchers will be trained and ready to start the search and examination process. The SSE may nevertheless still be implemented in phases, by initially commencing search and examination only in respect of certain technology fields.

An indication was given of the areas of scientific and technical knowledge of the searchers and/or examiners to be appointed, including chemistry, biochemistry, biotechnology, engineering (electrical, mechanical and mining), information technology, and specifically also pharmaceuticals.

Comments by IPASA

The recognition that the appointed 'patent searchers' would require further training is supported by IPASA. In particular it would be essential for the appointed persons, although having field-specific scientific and technical knowledge, to be trained in regard to the applicable legal and IP-related rules and principles, including the interpretation and assessment of patent claims, the relevance and role of the adequate disclosure of the inventive concept, the defined concepts of novelty and inventiveness, etc. It is recommended that the Continuing Professional Development (CPD) approach be adopted as part of the ongoing training of the patent searchers. Therefore as technology and approaches to innovation evolve, so too would the patent searchers need to keep up to date with these advances.

[5] See Singapore Patent Office Chart at http://www.ipos.gov.sg/Portals/0/Patents/Guide%20to%20applying%20for%20patents%20in%20Singapore%20%28as%20at%2030%20April%202014%29.pdf; and http://www.margaretlaw.com.sg/Article%20-%20Changes%20to%20Patent%20Law%20in%20Singapore.pdf, at 1-2; and http://baldwins.com/singaporean-patent-system-upheaval-imminent/

It is suggested that such training would require appropriately qualified and knowledgeable 'trainers', and that CIPC should consider cooperating with bodies and/or persons that could provide such 'trainers' and training, for example, from the Singapore IP Office, IPOS, the JPO, EPO and the USPTO.

IPASA urges that hiring and training of staff should be in place before the system is put into effect.

IPASA is willing to partner with the government, as appropriate, to support such training.

3. THE WAY FORWARD

3.1 Task Team

In the discussions that followed on the CIPC presentation, the meeting was informed that comments and proposals submitted by interested parties would be considered and, where appropriate, taken into account. A further discussion session to consider and discuss the comments submitted and the progress made by DTI/CIPC would be convened, probably towards the end of April 2015. The meeting was also informed that it was likely that a special Task Team, comprised of representation from the different stakeholders, would be appointed to oversee and drive the implementation of the SSE system.

Comments by IPASA

IPASA supports the continued involvement of stakeholders in the roll-out of the SSE system. It will be of critical importance for all stakeholders and interested parties to remain engaged in the further development of the SSE project to ensure that the best possible and practically feasible SSE model is eventually selected for implementation; and in the second place, to ensure that the implementation takes place in a controlled manner and that the outcome is indeed in the best interest of the country, of industry, and of the people.

The proposal for the appointment of a designated Task Team to oversee the implementation of the SSE system is also supported by IPASA. IPASA would be prepared and indeed amenable to designate a representative to be part of such a Task Team.

3.2 Regulatory System / Legislative Amendments

It would also be important, in planning and structuring the roll-out of the SSE system in practice, to identify, analyse and specify all of the finer procedural details and steps that would form part of, or could be used in the course of, a functionally effective SSE procedure. The SSE system should be set up in the form of a regulatory system providing for these features. In order to set up such a regulatory system, amendments to the Patents Act would be required, and applicable Regulations will have to be formulated and promulgated. To enable the users of the patent system to comply with and/or make use of applicable procedural details, adequate provision will have to be made in a regulatory system for all procedural steps, including optional steps, as well as for applicable timelines, i.e. by the issuance of clear and detailed Regulations.

Comments by IPASA

In the course of the discussions that followed on the CIPC presentation, and as a starting point the following procedural and practical aspects relating to the SSE system have been identified. These should be considered and, if appropriate, should be addressed in the Regulations to be formulated and issued as part of the legislative amendment:

- *the importance of ensuring that the selective introduction of the SSE system in respect of certain fields of technology will not constitute discrimination as prohibited by TRIPS;*
- *the importance of providing appropriate training to the patent searchers;*
- *the timelines and procedure for patent applicants to request SSE;*
- *the timelines and procedure and requirements (e.g. documentary material) for a patent applicant to submit foreign search and/or examination results;*
- *whether provision would be made for deferred SSE;*
- *whether provision would be made for expedited SSE;*
- *the progress of the SSE process, eg whether there will be opportunity to respond, to be heard, to submit counter-arguments and/or materials;*
- *the appeal procedure (timelines, grounds, etc.);*
- *whether provision would be made for the opportunity to amend the patent specification and/or claims during or after the SSE;*
- *the possibility for the enforcement of pending rights;*
- *the possibility for the enforcement of partially valid patents.*

IPASA submits that it would be necessary to address in detail all of the features listed above in structuring functionally effective SSE system. As recognised in the CIPC presentation, amendments to the relevant legislation will have to be enacted, including appropriate Regulations. IPASA is prepared to provide further comments and suggestions on the issues listed, should that be required or useful for purposes of formulating the necessary legislative amendments and Regulations.

4. CONCLUDING REMARKS:

IPASA wishes to express its appreciation to **the dti** and CIPC for convening the Roundtable Discussion to inform stakeholders of the preliminary investigations and analyses they conducted, in order to select the best way of introducing an SSE system in South Africa. We trust that the selected system will fit in with the policy and strategic objectives of the country, and will be designed and implemented in a manner that promotes South Africa as a destination for innovation and technology, and not impedes it.

In the comments set out above and in the explanatory information provided, IPASA has endeavoured to address all of the matters put forward at the Roundtable, and has also endeavoured to set out its views and comments on the issues raised in a constructive manner.

The pharmaceutical industry is supportive of a Substantive Search and Examination system (SSE). However, the SSE system should be applied equally to all categories of patent applications, regardless of the technology sector.

- The proposed SSE should be appropriately resourced to accommodate all sectors.
- There should not be discrimination by industrial sector for applicability of a SSE system or different patentability standards imposed based on the category of the invention.
- Discriminatory treatment would be counter to the broad objectives of the IP Policy which seeks to promote investment and growth across all parts of and all sectors of the South African economy. Discriminatory treatment of one sector would also be contrary to South Africa's treaty obligations under TRIPS article 27.1.

The SSE system should take into consideration the requirements and unique needs of South Africa, but at the same time be aligned to international accepted standards to meet the objectives of encouraging investment and innovation in the South African economy. To have a system where the South African court practice develops distinct standards of patentability (*e.g.,* what is considered a sufficiently inventive step) will result in inefficiency, and results in costly litigation and ultimately a system that is not predictable or reliable. This will run counter to the objectives of the Policy to provide a robust and strong IP system that encourages investment and innovation in the South African economy.

Opposition procedures, particularly pre-grant oppositions, introduce substantial delay and significant additional cost for patent applicants and delay the applicant's ability to obtain legitimate intellectual property rights. This works against the objectives of the IP Policy, not in their support. Post-grant oppositions, if adopted, should be limited to a defined period of time after grant, and to specified grounds of non-patentability, again to avoid unnecessary delay, cost and uncertainty to the interests of both the patentee and the public. An efficient appeal procedure from any opposition decisions should also be introduced out of fairness to the parties. The forum and nature of any opposition proceedings and appeal from opposition decisions should be clearly and definitively established, and should preferably be managed as a specialized judicial process managed by technically and legally experienced judges or equivalent adjudicators, to ensure credibility, fairness and efficiency.

The practical problem for the patent applicant is that, even though the invention may eventually be found to be patentable, the patent rights cannot be enforced before the patent has been granted. Furthermore, due to the delays a substantial proportion of the total patent life is lost.

IPASA submits that consideration should be given, as part of the introduction of an SSE system, to the following aspects, namely –

- that patents applications that undergo a substantive search and examination procedure should be entitled to a presumption of validity; and
- that the system should include appropriate provisions for a patent term adjustment procedure to compensate for delays in the grant of patent applications meeting patentability requirements, where these are caused by administrative delays in the patent office.

IPASA trusts that the comments and information submitted by it, and other stakeholders, will be of assistance to **the dti** and CIPC in structuring an SSE system for South Africa that will be feasible and functionally effective, and that will moreover be credible, valid and legitimate.

We agree that a critical factor for the success of an Intellectual Property Rights (IPRs) regime is balancing the exclusive rights of inventors and creators with the rights of the public. However, we note that strong IPR protections and rewarding innovation are directly associated with greater domestic and foreign investment in research and development and result in life-saving medicines and increased innovation overall. The innovative biopharmaceutical sector in particular – including companies of all sizes – relies on the ability to raise capital to support the substantial investments in R&D needed to develop today's treatments and tomorrow's cures.

Appendix 1 - Singapore Positive Grant Patent System Examination System [6]

All patent applications under the positive grant patent system undergo examination by a Singapore Patent Examiner. Thus, only patent applications that satisfy the patentability requirements would receive a Notice of Eligibility indicating that the application may proceed to grant. Otherwise, a Notice of Intention to Refuse will be issued.

Substantive Examination

The applicant may file a request for local substantive examination within 36 months from the filing date or priority date. Under this option, the applicant may select any one of the following:

1. request a substantive examination based on a local search report issued by Singapore (only if a request for search is filed within 13 months);
2. request a substantive examination based on a foreign search report issued for a corresponding application; or
3. request a combined search and examination.

Supplementary Examination

Alternatively, the applicant may opt to obtain a Singapore patent on the basis of a foreign examination issued for a corresponding foreign application by filing a request for Supplementary Examination within 54 months from the filing date or priority date. The documents required in filing the request are, as follows:

1. a copy of either the corresponding foreign patent or the final examination results with allowed claims referred to in the results; and

2. a table setting out how each Singapore claim is related to the allowed claims of corresponding application.

If the Examiner has objections after substantive examination and supplementary examination, a Written Opinion will be issued and a response must be filed within five months and three months, respectively, from issuance of the opinion. The substantive examination must be completed within 18 months from the issuance date of the first Written Opinion, while a supplementary examination must be completed within six months. Thereafter, the Examiner will issue a Substantive Examination Report or Supplementary Examination Report along with a Notice of Eligibility or a Notice of Intention to Refuse. For the latter, the applicant would still have the option to file a request for an Examination Review or allow the application to be finally refused.

[6] http://www.asiaiplaw.com/article/39/1787/

Appendix 2 - Innovative Pharmaceutical Association South Africa (IPASA) Member Companies

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1. Abbott
2. AbbVie
3. Alcon
4. Allergan
5. Amgen
6. Astra Zeneca
7. Baxter
8. Bayer
9. Boehringer Ingelheim
10. BMS
11. Mallinckrodt
12. Ferring
13. Galderma
14. GE
15. Janssen
16. Lilly
17. Merck
18. MSD
19. Norgine
20. Novartis
21. Novo Nordisk
22. Pfizer
23. Sanofi
24. Servier
25. Takeda