



Senator Harris, Representative Ritter, Senator Debicella, Representative Giegler and members of the Public Health Committee, we appreciate the opportunity to submit this written testimony in **opposition of Senate Bill 270 AAC the Establishment of a Regional Policy on the Prohibition of Certain Gifts from Pharmaceutical and Medical Device Manufacturing Companies to Health Care Providers**. While we appreciate the intent of the Committee in putting this legislation forward, we feel strongly that this legislation is burdensome, duplicative and over-reaching and will significantly and negatively impact our business here in the state of Connecticut.

Boehringer Ingelheim is a large employer headquartered in Ridgefield, Connecticut. We have over 9,000 employees in North America and more than 2,500 of these are located here in Connecticut. We manufacture medicines in therapeutic areas including, among others, Cardiovascular, Respiratory, Urology, HIV and the Central Nervous System. We are good corporate citizen and have a long history in Connecticut of actively supporting local organizations and institutions. We formed the Boehringer Ingelheim Cares Foundation in 2001 and in 2007 alone the Foundation assisted over 38,000 patients, distributing product with a wholesale value of over \$35 million. We have been recognized as the "World's Most Respected Biopharmaceutical Employer" by Science Magazine. We have had many partnerships with the state of Connecticut and have appreciated the state's assistance in allowing us to grow here. The state has provided financial assistance for infrastructure improvements, building expansions and through various tax credit programs. We believe that the state has offered this assistance in part to allow us to grow here and in part because of the realization that it is costlier to do business here than in some other parts of the country and the world. The state wants to be "competitive"; however, this bill does not send that message to our company or our industry.

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We are members of the Pharmaceutical Research and Manufacturers of America (PhRMA) and have adopted and adhere to the PhRMA Code on Interactions with Healthcare Professionals. This Code was designed and implemented to ensure that we commit ourselves to following the highest ethical standards as well as all legal requirements. And while we have implemented safeguards and processes, at our cost, to ensure that our professionals appropriately interact with healthcare providers, Boehringer Ingelheim would incur significant additional cost to comply with this legislation. For example, we would be required to design and implement a process or a system to track every healthcare provider in Connecticut. While we do, in accordance with the Code, track and prohibit a number of activities and interactions with healthcare professionals, the definition of “health care provider” in the legislation is overly broad and includes not only licensed professionals, but also “a partnership or corporation comprised of such persons, or an officer, employee, agent or contractor of such person acting in the course and scope of his employment, agency or contract related to or in support of the provision of health care to individuals.” This is not information we currently track and would be an extreme undertaking to compile with in an attempt to comply with the proposed legislation. Additionally, many of our promotional speaker programs are held at out of office venues, prohibition of out of office meals at speaker programs would mean we would not be able to engage in that activity going forward. Since it also appears the proposed law affects activities of healthcare providers licensed in the state and their employees when they are outside Connecticut, there would be a need to train Boehringer employees in surrounding states and those that attend conferences on the law, so that they will not invite these providers to promotional programs. These examples would translate to less interaction with health care providers, and less opportunity for these providers to obtain valuable education on new treatments. These are a few small examples of how onerous this legislation would be on our company.

The industry has recognized that some former practices are not tolerable in today's world. That is why we police ourselves and developed a rigorous Code of Conduct. In addition to the Code, there are a number of laws already in place to deal with many of the scenarios or practices contemplated to prohibit in this legislation. For a company such as ours, that is headquartered here but has facilities in numbers of states the price tag associated with different compliance rules is incredible and problematic. As a company, we routinely analyze the costs of doing business within this state and in the other states where we have assets and make decisions accordingly. Legislation such as this increases our costs significantly and can tip the scales in terms of where invest in growth or relocate divisions. Connecticut has been good to us and, in turn, we have been good to Connecticut. This legislation is not good for us and not good for Connecticut.