Measures for the Administration of Medical Representatives

China – National Medical Products Administration, Ministry of Public Security, National Health Commission, State Administration for Market Regulation, National Healthcare Security Administration, National Administration of Traditional Chinese Medicine, National Disease Control and Prevention Administration

Main information

Scope of Application:

Rules on the qualification conditions and professional conduct of pharmaceutical representatives within China

Effective Date:

August 1st, 2026

Related Provisions:

- Drug Administration Law
- Physicians Law
- Regulations on the Supervision and Administration of the Use of Healthcare Security Funds

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Key Topics

Framework

- **Definition of "pharmaceutical representative"** is defined as a practitioner employed or authorized by a drug marketing authorization holder (MAH) to engage in academic promotion activities—specifically conveying, communicating, and providing feedback on drug information to healthcare institutions and their staff.

- Dual Responsibility Structure: The Measures establish a two-sided accountability framework: (1) MAHs bear primary responsibility for their representatives' conduct and must establish management systems covering the entire representative lifecycle ; (2) Healthcare institutions must establish internal systems to regulate staff interactions with pharmaceutical representatives and manage representative access to their facilities.

What's new

- A dedicated chapter establishes that MAHs bear the primary responsibility for the conduct of their representatives, requiring them to establish **management systems** covering employment, authorization, filing, training, and promotional activities

- The Measures introduce a 22-item **prohibition list** across four categories of regulated entities: MAHs, entrusted professional organizations, pharmaceutical representatives, and healthcare institutions and their staff. This includes the "nine prohibitions" for representatives and the "five prohibitions" for healthcare institutions and their staff

Sensitive Factors

- Foreign MAH: The Domestic Responsible Person takes the responsibility. Joint Liability with the Foreign MAH shall apply

- Pharmaceutical representative must now hold a college degree or above in medicine, pharmacy, or a related field, and pass training and assessment by the MAH.

Drivers

- **Transitional Arrangement**: Representatives already registered (filed) under the 2020 trial measures remain valid under the "old rules for old cases" principle, but MAHs must supplement their information under the new requirements
- **Filing compliance:** Without proper filing, registration, and adherence to hospital-specific codes of conduct (such as "timing, location, personnel, and recording" rules for promotional activities), representatives will be denied access by compliant healthcare institutions, effectively blocking product communication channels
- Incentives for **Social Governance** and Industry Oversight: The Measures encourage industry associations to play a role in supervision and self-discipline. Companies and compliance-conscious professionals can leverage this framework to differentiate themselves by demonstrating full compliance and transparency, thereby building trust with compliant healthcare institutions