Comment on paper ‘Transparency and trust in the European pharmaceutical sector’

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Comment on paper ‘Transparency and trust in the European pharmaceutical sector’

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Löfstedt and Way (2014) present a valuable empirical analysis of the relation between transparency and trust in pharmaceutical regulators. They correctly note that a positive relation between transparency and trust is generally assumed, but empirical evidence for this relation is limited and often even highlights the opposite effect. The authors aim to contribute to the debate about transparency and trust in regulators by conducting an experimental study in the UK and the Netherlands. Information from Periodic Safety Update Reports is presented to respondents and their opinions are measured through a questionnaire and interviewing.

Their interesting study shows that the respondents find the information about the side effects of pharmaceuticals worrisome, but they do welcome the additional information. They argue that transparency will result in additional information-seeking behavior of citizens and to more discussions between GPs and pharmacists and patients. Confusion rather than clarity is the result of access to these Periodic Safety Update Reports of drugs. Still, a broad majority of the respondents state that this type of transparency strengthens their trust in the pharmaceutical regulator.

The authors conclude that ‘fishbowl transparency’ may not be the right way ahead and argue for integrating transparency in effective, evidenced- and science-based benefit/risk communication. This conclusion fits within a broader reconceptualization in the academic world: various researchers at the recent international conference on transparency research in Jouy-en-Josas (France) emphasized that we should conceptualize transparency as a communication process rather than as a process of making raw data available.

This study is clearly well thought through but also raises some fundamental questions:

1. **Trust in whom?** The authors focus on the relation between transparency and trust in the risk regulator, but the information about the side effects of pharmaceuticals mostly comes from the pharmaceutical company. This complicates the relation of trust since we are talking about trust in both the pharmaceutical company and the regulator. The trust relation between

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citizens and regulators needs to be positioned within a web of relations between various actors in the pharmaceutical domain.

(2) Transparency for what? The authors highlight that transparency is not only about enhancing public trust but also about improving pharmaceutical practices. Meijer (2007) highlights that transparency stimulates public organizations to improve their practices since they know that they are operating in the ‘public eye.’ The authors conclude that transparency may not simply contribute to more trust, but one can question whether it is most important. Transparency may be extremely effective if it results in better compliance of pharmaceutical companies.

(3) Trust to what extent? The study suggests, in line with colloquial use of the word, that trust is something that is desirable. The question is whether this also means that more trust is always better or whether too much trust should be avoided. In terms of checks and balances, a certain level of distrust may be helpful to stimulate critical assessments of pharmaceutical practices and these assessments may contribute to safer drugs (cf. Grimmelikhuijsen 2012). The confusion created by access to the Periodic Safety Update Reports may stimulate patients to better monitor pharmaceutical companies and regulators.

The paper presents rich data and a strong analysis, but to develop a rich understanding of the relation between transparency and trust, we need to analyze certain factors more in depth. The authors correctly note that more international data are needed. In addition, it would be valuable to compare different regulatory domains to obtain a better understanding of the role of the institutional and situational context. On the basis of current academic debates about transparency and trust, I would also like to identify some more specific factors:

(1) Characteristics of citizens. Grimmelikhuijsen and Meijer (2014) have shown that the relation between transparency and trust works out differently for citizen with low or high knowledge about the subject and with a low of high general level of trust in government. Further research is needed to understand how the level of knowledge about pharmaceuticals and the general trust in risk regulation influence the relation between transparency and trust.

(2) Subject of transparency. The nature of the transparency in this paper is rather dramatic: the Periodic Safety Update Reports contain information about issues of life and death. Information about these issues may be processed differently, more emotional, than information about minor issues. Further research needs to investigate how the nature of the issue affects the relation between transparency and trust.

(3) Informational content. The information presented to respondents is only about risks and not about the benefits of these pharmaceuticals. The companies need to report on drug safety, which means that the respondents are presented with one-sided information. Risks are presented but not the benefits. We need to develop a better understanding of not only the level of transparency but also the informational content to understand the relation between transparency and trust.

(4) Behavioral intentions. The empirical findings show a very high degree of consistency and limited variation between the respondents. This seems to
indicate that the research measures a discourse on transparency rather than individual opinions. The authors recognize this in their observation that a social desirability bias may have influenced the outcomes of this study. Further research may take the conceptualization of trust from perceptions to behavioral intentions.

Löfstedt and Way (2014) correctly note that the relation between transparency and trust is not straightforward. The challenge is now to develop richer models of this relation that feed the public debate about transparency and help to develop forms of transparency that not only empower people but also result in safer practices. This requires further empirical research and also a stronger conceptualization of the relation between transparency and trust. Theories about risk communication may be helpful in taking our theoretical understanding of the relation between transparency and trust to the next level.

References