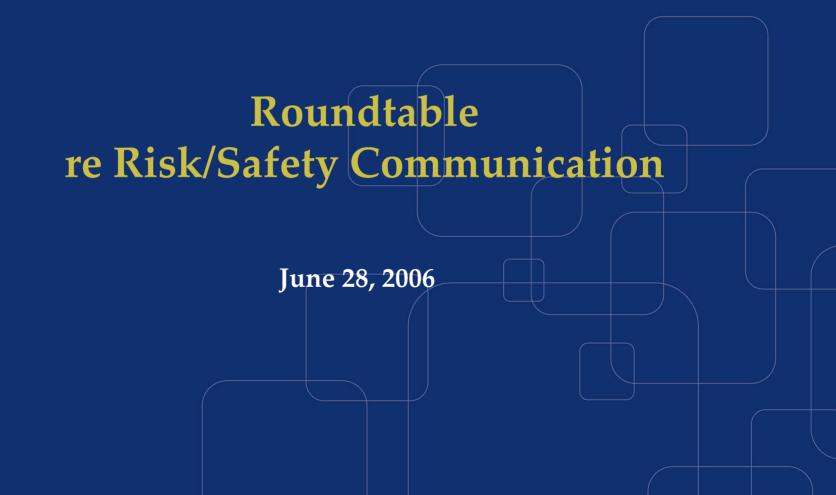
Attachment C



Advertising Standards Canada Les normes canadiennes de la publicité



Overview

- About ASC
- ASC's role in advertising preclearance of nonprescription drugs and natural health products

Summary of Stakeholder Input re Section 2.21

- # of comments: 21
- Submitter Breakdown:
 - Academia (1)
 - Patient/Consumer groups (3)
 - Health Professionals (2)
 - Media (2)
 - Advertising Agencies (2)
 - Industry/Advertisers (10)
 - Advertising Preclearance (1)

Summary of Stakeholder Input: In Support of Section 2.21

- # of comments: 6
- Consensus that risk information should be communicated to consumers in nonprescription drug and NHP advertising
- All supported language in 2.21, and suggested additional requirements for inclusion

Summary of Stakeholder Input: In Support of Section 2.21

- Multiple comments received suggesting additional requirements:
 - 1. Ads should include clinical trial information
 - 2. Ads should identify active ingredient
 - 3. Ads should include ADR information

1) Recommendations re Clinical Trials (2 comments)

- Ads should communicate whether or not clinical trials have been conducted
- Ads should state which population groups product was tested on, as well as state that benefits and risks to other populations are unknown
- Ads should include information regarding duration of studies and sponsors

2) Recommendation re Active Ingredient (2 comments)

Ads should include the name of the active ingredient

In Support of Section 2.21 3) Recommendation re ADR Reporting (2 comments)

- Ads should advise consumers to report ADRs to health professionals or Health Canada
- Ads should include information regarding reporting ADRs to Health Canada

In Support of Section 2.21 Additional Recommendations

(1 comment)

Guidelines should:

- Provide technical parameters for verbal communication of risk information e.g. speed/cadence
- TV/radio requirement to consult label in audio should also apply to internet
- Include requirement that verbal message direct consumers to label or health professional to obtain risk information
- Require that advertisements give equal weight to product risk and benefit

Summary of Stakeholder Input: Not In Support of Section 2.21

- # of comments: 15
- Agree with principle of informed consumer, but disagree that nonprescription drug and NHP product advertising is appropriate vehicle to achieve this
- No support for 2.21 as drafted

Summary of Stakeholder Input: Not In Support of Section 2.21

- Multiple comments were received on the following:
 - 1. Request for evidence re rationale for new requirement
 - 2. Practicability of advertising for presentation of risk information
 - **3.** Guideline **overly expansive** for all self-care products

Not In Support of Section 2.21 1) Request for Evidence (7 comments)

- Questions raised:
 - What precipitated need for 2.21?
 - What concerns exist with current nonprescription/NHP advertising?
 - » Is there evidence that advertising is resulting in product misuse and adverse health consequences?

Not In Support of Section 2.21 2) Practicability of Advertising to Communicate Risk

(11 comments)

- Advertising not the appropriate vehicle to communicate risk
 - Not possible to provide required information in many advertising media, i.e. TV, radio, out-of-home
 - Other more effective ways to communicate risk

(cont'd)

Not In Support of Section 2.21 2) Practicability of Advertising to Communicate Risk

- Could lead consumers to believe that the ad includes all important safety information
 - Concerns re subpopulation groups subject to less prevalent risks
- Potential for consumer over-reliance on advertising as sole information source
- Products supported by non-compliant advertising may be perceived by consumers as being "safer" than products supported by compliant advertising

Not In Support of Section 2.21 3) Guideline Overly Expansive (4 comments)

- Guideline overly expansive for all self care products
- Question if application to all products would result in any health/safety benefit for consumers

Summary

- Consultation generated strong interest
- Full support for informed consumer, but no consensus re means to achieve
- Desire for additional dialogue



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