

**ASC  
NCP**

Advertising Standards Canada  
Les normes canadiennes de la publicité

# Roundtable re Risk/Safety Communication

June 28, 2006

# 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**

# In Support of Section 2.21

## 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

# In Support of Section 2.21

## 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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