

OFFICE OF THE COMMISSIONER OF OFFICIAL LANGUAGES

STUDY

ADVERTISING

Advertising

Advertising

ADVERTISING

**LINGUISTIC DUALITY
IN COMMERCIAL ADVERTISING AND SPONSORSHIPS**

ADVERTISING

ADVERTISING

REPORT
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Official Languages



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EXECUTIVE SUMMARY

This study examines the place of Canada's linguistic duality in commercial advertisements and sponsorship messages in publications of organizations subject to the *Official Languages Act* (Act). The publications include magazines, brochures and booklets produced by or for VIA Rail, Canada Post, Air Canada, the National Arts Centre, the Canadian Tourism Commission, the National Gallery of Canada, the National Capital Commission, Industry Canada and Foreign Affairs and International Trade.¹

Whereas linguistic obligations dictate that the publications be issued in both official languages, each organization has adopted its own policy on the language of private sector advertisements and sponsorship messages included in its material. Several organizations ensure linguistic consistency in the editorial and advertising content of their publications by imposing a bilingual requirement on advertisements and sponsorship messages. Other organizations take different approaches to the issue of language in advertising and sponsorships, much to the disadvantage of French.

Linguistic discrepancies between editorial and advertising content detract from the representation of Canada's linguistic duality otherwise achieved by the bilingual character of the publications in question. Unilingual ads and sponsorship messages appear out of place in publications which are otherwise devoted,

at considerable effort and cost, to communicating information to English-speaking and French-speaking Canadians in their preferred language.

The study draws from the experiences of the organizations associated with the publications and selected marketing agencies to identify factors and considerations which influence the language of commercial advertising and sponsorship messages in bilingual publications. Major factors include the importance of the Francophone market to the advertiser or sponsor, the publication's linguistic format and the attractiveness of alternative advertising vehicles. Other considerations are the availability of translation assistance, private sector costs of bilingual ads, an advertiser's ability to provide service in both languages, the feasibility of alternatives to bilingualism (such as balancing unilingual English and unilingual French ads) and the use of third parties.

Our examination of the relationship between organizations subject to the Act and their advertising partners illustrates the relevance of Canada's linguistic duality to marketing forces in this country and suggests that more can be done to reinforce that link. Information and sensitization go a long way to this end, to which we hope our study has contributed. Each publication is nonetheless unique and specific measures need to be explored in each case for their potential benefits. The study concludes with a series of guidelines to help organizations with linguistic responsibilities achieve the shared goal of promoting an important Canadian value in commercial relationships concerning current and future communication projects.

1. Some of the material examined in this study are published directly by organizations subject to the *Official Languages Act* while some are produced by private companies under contract.

I. INTRODUCTION

In early 2003, the Office of the Commissioner of Official Languages launched a study of the language of commercial advertising and sponsorship messages in publications by organizations subject to the *Official Languages Act* (Act). While the magazines and brochures in question are issued in both languages in accordance with the legal obligations of the organizations concerned, Canada's linguistic duality is not always similarly reflected in the publications' commercial content. Where this occurs, the publishers' efforts to respect the preferred official language of their readers are offset by the decision of private enterprises to reach the same readers, who represent the market for their products and services, in one language only.

The purpose of our study was to assist organizations subject to the Act in identifying ways to encourage, where needed, their private-sector advertisers and sponsors to reflect our linguistic duality in their marketing activities in publications which already reach out to English-speaking and French-speaking Canadians in their own language. These organizations have a responsibility, by virtue of the Act's provisions for the advancement of English and French, to adopt policies and practices conducive to commercial advertisements and sponsorship messages in both languages in their publications.

Most federal institutions are prohibited from including commercial advertising in their published material. However, some federal organizations, such as Crown corporations, are not directly subject to the policy and others use sponsorship messages, which are permitted under certain conditions, instead of ads. Private companies that are subject to the Act, such as Air Canada, are not bound by these restrictions.

The study covers VIA Rail's *Destinations* magazine, Air Canada's *enRoute* magazine, Canada Post's *SmartMoves* brochure, the National Arts Centre's *Prélude* booklet, the National Gallery of Canada's *Vernissage* magazine and various publications by the Canadian Tourism Commission and the National Capital Commission. Also included are the Department of Foreign Affairs and International Development's *Bon Voyage, But...* brochure and Industry Canada's *SchoolNet* magazine, both of which contain sponsorship messages.²

We describe below the methodology used in our study and the relevant legislative and policy framework before presenting the results of our analysis and the conclusions we draw. The conclusions lead us to offer a set of guidelines for promoting linguistic duality in commercial advertising and sponsorships.

II. METHODOLOGY

For purposes of the study, we interviewed officials responsible for the publications in each organization, except Air Canada, to discuss the linguistic state of commercial advertisements and related policies and practices.³ We also met with representatives of private-sector companies that

2. To our knowledge, these are the only publications by organizations subject to the Act that currently contain commercial advertising and sponsorship messages.
3. Air Canada explained that external factors and other considerations prevented it from participating fully in the study, which was under way in the period leading up to the Corporation's announcement in early April 2003 of its filing for protection under the *Companies' Creditors Arrangement Act*.

solicit ads for several of the publications covered in the study. In addition, we consulted officials at Treasury Board Secretariat with regard to the federal government's Communications Policy, which includes provisions for advertising, sponsorships and partnerships, as well as official languages. Canadian Heritage officials were consulted as well given the Department's coordinating and promotional responsibilities under Part VII of the Act.

We appreciate the full co-operation we received from all who participated in the study. We make special mention here of the private sector representatives who contributed to our understanding of the business and marketing context.

III. LEGISLATIVE AND POLICY FRAMEWORK

A. Official Languages Act

Federal institutions and other organizations subject to the Act have a responsibility to promote Canada's linguistic duality in all their activities. This responsibility is prescribed in Part VII of the Act which states that,

41. The Government of Canada is committed to (...)
- (b) fostering the full recognition and use of both English and French in Canadian society.

For purposes of this study, this means actively encouraging private sector companies which place advertisements and sponsorship messages in their magazines and brochures to do so in both official languages.

Part VII also assigns both a co-ordinating role and specific mandate to the Minister of Canadian Heritage for the advancement of the two languages. The co-ordinating role is prescribed in section 42 as follows:

42. The Minister of Canadian Heritage, in consultation with other Ministers of the Crown, shall encourage and promote a coordinated approach to the implementation by federal institutions of the commitments set out in section 41.

Section 43 includes several pertinent references in prescribing the Minister's specific mandate under Part VII. It states:

43. (1) The Minister of Canadian Heritage shall take such measures as that Minister considers appropriate to advance the equality of status and use of English and French in Canadian society, and, without restricting the generality of the foregoing, may take measures to (...)
- (c) foster an acceptance and appreciation of both English and French by members of the public; (...)
- (f) encourage and cooperate with the business community, labour organizations, voluntary organizations and other organizations or institutions to provide services in both English and French and to foster the recognition and use of those languages;
- (g) encourage and assist organizations and institutions to project the bilingual character of Canada in their activities in Canada or elsewhere.(.)

B. Communications Policy of the Government of Canada

The federal government's Communications Policy, issued by Treasury Board, sets out policy requirements for departments and agencies to ensure the co-ordination and management of all types of communications. It applies to Government of Canada institutions identified in Schedules I, I.1 and II of the *Financial Administration Act* (FAA). Other public institutions subject to the FAA, particularly Schedule III Crown corporations, are encouraged to apply the policy's principles to their own communications management. The policy does not apply to Air Canada as it is a private enterprise.

The Communications Policy bans commercial advertising in government publications and on government Web sites. Of the organizations covered in our study, only the Department of Foreign Affairs and International Trade and Industry Canada are subject to the ban. Most of the other organizations are Crown corporations whose mandates include a commercial component.

The Communications Policy allows the use of sponsorship messages under certain conditions. It states: "A sponsored project or activity may include advertising or promotional efforts involving the media as part of a communication strategy. However, such efforts must not be the focus of a sponsorship, but simply an aide to informing the public about it."

IV. OBSERVATIONS

Our analysis of the language of commercial advertising and sponsorship messages looks first at those publications where private companies are required by the publishers to advertise or place

sponsorship messages in both languages and the implications of this requirement on the business relationship and the bottom line, namely advertising and sponsorship revenues. The second part examines the case of four organizations that have taken different approaches to this issue and the reasoning behind their decisions. The third section extracts from the experiences of the various parties involved in this issue, representing both the public and private sectors, to focus on the key factors and considerations influencing the language of commercial advertising and sponsorship messages in bilingual publications.

A. Mandatory Bilingualism

Five of the nine organizations covered by our study require that commercial advertising and sponsorship messages be in both official languages. The organizations are VIA Rail, Canada Post, the National Capital Commission, the Canadian Tourism Commission and Foreign Affairs and International Trade.

1. VIA Rail

VIA Rail offers its passengers *Destinations*, a magazine containing travel-related information and advertising. It is produced in partnership with two private-sector companies, one of whom publishes the magazine. The other partner markets *Destinations* to potential advertisers and earns a commission on each advertising sale.

VIA Rail issues three regional versions of *Destinations* six times a year for Western, Central and Eastern Canada. The layout and content of each version is identical but advertising may vary. VIA's own advertising is adapted for each regional audience. Other advertisers may choose to purchase

ad space on a national basis (that is, in all three versions) or they may opt for one or two regions. VIA, through its marketing firm, encourages advertisers to purchase ads in all three versions and most do so. It was pointed out to us that because most of Canada's population resides in the Central region, it generally makes good business sense for companies to purchase advertising space in the issue distributed in this region. It was also pointed out that local or regional tourist-oriented companies generally target other regions as the local population tends to be less interested in local tourist activities and services.

In each region, bilingual versions of the magazine in tumble format are distributed to VIA passengers.⁴ Advertisements are in the language of the version in which they appear and the English and French versions in each region contain the same advertisements. Advertisers in a recent issue distributed in the Central region include hotel chains, a car rental company and provincial tourism agencies as well as a west coast ferry company.

VIA Rail requires that advertisements be submitted in both languages. This requirement is stipulated in its contract with the firm responsible for soliciting ads. According to VIA, the bilingual requirement has not reduced the number of ads in *Destinations*.

2. Canada Post Corporation

Canada Post distributes through its network of post offices and franchises a brochure entitled *SmartMoves*, containing information and

4. Unilingual versions of *Destinations* are distributed as newspaper inserts.

advertisements aimed at people who are changing residences. It is published by a private company under contract with the Corporation. Other than a copy of Canada Post's Change of Address form which is included as an insert, the brochure is produced and printed by the publisher which is also responsible for soliciting private-sector advertisers. The brochure is supplied to Canada Post each year at no cost. The publisher's costs are offset by advertising revenue, all of which is retained by the firm.

In its agreement with the publisher, Canada Post requires that *SmartMoves* be issued in both official languages. As the brochure is produced in distinct English and French versions in tumble format, advertising is expected to be in the language of each version. Canada Post closely monitors the linguistic quality of the advertisements prior to publication and requires that advertisers revise texts when it deems it necessary. We understand that most French-language ads are sent back for revision. The Corporation does not provide translation assistance to advertisers or to the publisher.

The publisher has never lost an advertiser due to the bilingual requirement. We were told that some advertisers expect it given Canada's linguistic duality and the publication's national distribution. The bilingual requirement is said to cause some aggravation, particularly among the many *SmartMoves*' advertisers that do not normally advertise in French, but not to the point where it becomes an obstacle.

3. National Capital Commission

The National Capital Commission produces various tourist-oriented brochures and other material which contain commercial advertising as well as

sponsorship messages. We examined in particular the 2003 Winterlude brochure, the 2002 Canada Day brochure, both of which are oriented to residents and visitors in the National Capital Region, and a nationally distributed publication entitled *Awaken Your Senses*.

The Winterlude and Canada Day brochures are issued in a bilingual side-by-side format. *Awaken Your Senses* is produced in separate English and French versions.

The Commission requires that advertising and sponsorship messages in its publications be in both languages. In the case of the bilingual Winterlude and Canada Day brochures, the result is that each ad or message contains a bilingual text. However, advertisements in *Awaken Your Senses* are in the language of the version in which they appear, as in the case of VIA's *Destinations* magazine and Canada Post's *SmartMoves* brochure.

According to the Commission, its advertisers and sponsors do not resist the bilingual requirement, which has been in effect for many years. We were told that the private sector tends to expect it given the Commission's mandate and given that both linguistic groups are well represented in the region's population and among visitors. The Commission offers translation and editing assistance to advertisers and sponsors who require it for producing an ad in both languages. It also provides creative assistance when necessary to ensure the effectiveness of bilingual messages.

4. Canadian Tourism Commission

The Canadian Tourism Commission issues numerous publications containing varying amounts of commercial advertising. Our study examined in

particular the Commission's monthly *TOURISM* magazine, aimed at destination marketing organizations as well as other organizations in the tourism industry, and a new bi-annual travel magazine entitled *PureCanada*, directed at travellers in Canada as well as abroad. The Commission produces the publications in partnership with a private company that is responsible for the advertising content.

TOURISM is published in separate English and French versions and ads appear in the language of the version in which they appear. The Commission's *PureCanada* magazine promotes Canada as a tourist destination within Canada and the U.S.A. It is also issued in separate English and French versions. Companies can choose to advertise in French in the Canadian version for the francophone market or in English in the American or Canadian version for the anglophone market. They can also purchase a North American package, which includes advertising for each version.

All advertising must be in the language of the version in which it appears. The firm that solicits the ads will help arrange translation assistance through the Tourism Commission for companies that lack the capacity.

We were advised that the language requirement is readily accepted by national companies. There is sometimes resistance among other companies which are not used to bilingualism, but officials could recall only one or two cases where a company decided not to advertise because of the language requirement, compared to the hundreds of ads which have appeared in both languages in the Commission's publications over the years.

5. Foreign Affairs and International Trade

Foreign Affairs and International Trade includes a number of sponsorship messages in a booklet entitled *Bon Voyage, But...* which targets the Canadian travelling public. The booklet, published by the Department's Consular Affairs Bureau, is issued annually and distributed nationally in separate English and French versions. The cost of the booklet is covered by the sponsorships.

The Department offers sponsors space in the booklet as a package deal covering both language versions. Sponsors are required to place messages in each version; they are not given an option. The Department will provide translation and editing assistance if necessary. However, most companies provide their own translation.

Officials informed us that they have not encountered resistance by sponsors to the bilingual requirement. They explained that they select as sponsors only national companies. They suggested that *Bon Voyage, But...* is a particularly attractive advertising vehicle to travel-oriented businesses in that it allows them to reach directly large numbers of Canadians travellers.

B. Optional Bilingualism

1. Air Canada

Air Canada's on-board magazine, *enRoute*, is a monthly publication offering passengers numerous travel-related and general interest articles. Compared to most of the other publications included in this study, the magazine attracts a large number of advertisers.

enRoute is issued in a side-by-side bilingual format. Companies are encouraged to place bilingual ads but the final decision rests with the advertisers.

Most advertisements in any given issue of *enRoute* are in English only. However, the situation has noticeably improved in recent years. In May 2000, when the language of advertising in *enRoute* was last raised with Air Canada, approximately 10 percent of the advertising space consisted of bilingual or linguistically neutral advertisements.⁵ A review of 10 subsequent issues between October 2000 and March 2003 indicates, by our calculations, that the amount of advertising space taken up by bilingual or linguistically neutral advertising by companies other than Air Canada has more than doubled to approximately 22 percent on average.⁶

The increase in the percentage of space occupied by bilingual or linguistically neutral advertisements followed a commitment by the Corporation in June 2000 to reinforce encouragement to companies to advertise in both languages. According to information provided by Air Canada, this encouragement includes promotion in markets throughout Canada and abroad of Canada's bilingual status and that of the Corporation as well as advantageous pricing for two (English and French) ads. Air Canada also noted that a media kit developed for advertising sales includes demographic data on Air Canada's clientele and that its Web site provides a link to *enRoute* offering an overview of the content of the most recent issue. The Corporation referred as well to the use of a

5. Our data are based on a manual count of the total number of advertising pages. Our figures are approximations and serve primarily as points of comparison of 11 issues of the magazine.

6. This was based on a review of the following issues: October 2000, May and September 2001, April, May, June, July, September, December 2002, and March 2003.

new advertising firm that is well known in Quebec. According to Air Canada, these measures and tools are aimed at allowing advertisers to make informed decisions based on their targeted customers and on the existence of English-speaking and French-speaking markets in Canada.

2. National Arts Centre

The National Arts Centre's contribution to our study is its *Prélude* booklet which is distributed to the Centre's patrons attending music, theatre and dance performances. *Prélude* is published five times a year by a private sector company under contract with the Centre. The booklet is produced by the publisher as a vehicle for providing information on each production to members of the audience. Production notes are inserted into the booklet which otherwise consists of advertisements by private companies as well as general information and advertising by the Centre itself. The publisher is responsible for all private-sector advertising.

Except for production notes, which are bilingual or in the language of the performance, the booklet is identical for all performances at the Centre during a given period. A recent issue of *Prélude* attracted 18 private-sector advertisers, 17 of which placed English only ads. One ad was in French only. No ad was bilingual.

The linguistic discrepancy between editorial and advertising content is particularly anomalous in the versions distributed to patrons of the Centre's French Theatre performances. For each production, audience members are presented with a booklet in which information concerning the performance is bilingual or in French only while virtually all advertising is unilingual English even though, in these instances, the vast majority of its readership is presumably French speaking.

Prélude's advertisers represent a wide variety of mostly local businesses. According to interviewees, national companies are generally less interested in advertising in publications with *Prélude*'s relatively limited distribution levels. We were also advised that the smaller advertising budgets of local companies oblige them to compare carefully the cost effectiveness of alternative vehicles in the region for reaching their potential Francophone market. When questioned about the feasibility of a distinct issue of *Prélude* for the Centre's French Theatre, officials explained that the distribution level for such a product would make it a hard sell to advertisers. They added that dividing *Prélude*'s distribution into components could render it generally less attractive to advertisers.

The situation appears to have changed little since 1997 when we last discussed the matter with the Centre's officials who assured us that steps would be taken to encourage businesses to advertise in both languages. In the course of the current study, we learned that the publisher is expected to encourage advertisers to place bilingual ads in *Prélude* and to seek potential Francophone advertisers. However, these expectations are not reflected in the Centre's contract with the publisher. Officials expressed concern that language requirements would reduce the number of ads sold, thus adversely affecting a source of revenue for the Centre. We find such concerns difficult to reconcile with the region's demographics, notably the fact that almost one third of the population is French-speaking and that the region attracts large numbers of tourists of both language groups.

3. National Gallery of Canada

The National Gallery of Canada's *Vernissage* magazine offers information on art and expositions. It is published by the Gallery in partnership with a

firm responsible for the advertising content. The magazine is issued quarterly and distributed free to Friends of the National Gallery of Canada. It is also available for purchase at certain newsstands and by subscription. Advertisements supplement sales to help defray production costs. The magazine is presented in a bilingual side-by-side format.

Most of the commercial advertisers in *Vernissage* are private art galleries and museums. A review of the seven most recent issues shows that, by our estimation, approximately 26 percent of the advertising space was taken up by bilingual or French-only advertisements, although the linguistic breakdown varies considerably among individual issues. Almost half (46 percent) of ads in the Spring 2001 issue of *Vernissage* were bilingual or French only compared to less than 10 percent in the Spring 2002 issue. We understand that the Gallery aims to increase the number of French-only ads in order to balance English-only advertising in its magazine. It may be useful for the Gallery to explore the linguistic and geographic breakdown of its readership for data that may encourage more commercial clients to advertise in French.

The situation is different with respect to sponsorship messages appearing in *Vernissage*. Sponsorships are solicited directly by the Gallery. In return for a sponsorship, a company is provided advertising space. Because all expositions are bilingual, sponsors are strongly encouraged to communicate their messages in both languages. Although the Gallery does not provide translation assistance to sponsors, it sometimes prepares the text of the sponsorship message itself which it does in English and French. The sponsorship messages identified in our study were bilingual.

4. Industry Canada

Industry Canada distributes a magazine entitled *SchoolNet* to all schools in Canada as well as certain educational organizations. The magazine is designed to provide educators with resources and information about the integration of information and communication technologies into the classroom. Each issue includes sponsorship messages from *SchoolNet's* private sector partners. Such messages are part of contribution agreements between the partners and *SchoolNet* and do not endorse private sector products and services.

SchoolNet is issued three times a year in separate English and French versions. At the time of the study, most sponsorship messages ran in both versions, but several appeared in only the English or French edition. We understand that all messages by private sector partners are now produced for both editions.

C. Key Factors and Considerations

Our discussions with both public and private sector representatives confirmed, not surprisingly, that private enterprises make marketing decisions based on potential sales and profitability. An ad or sponsorship must be seen as contributing to sales at minimal cost for the company to proceed.

It is within this frame of reference that we review in this section several factors and considerations which we found, based on our discussions, to have varying degrees of influence on the language of commercial advertising and sponsorship messages in bilingual publications. The first three considerations — the importance of the Francophone market, the linguistic format of the publication and the attractiveness of other advertising vehicles — are deemed to have the

strongest influence. Although each publication is unique and the subject of different circumstances, these considerations stood out in our discussions and research for the breadth of their relevance and their potential for changing existing habits.

1. Francophone Market

In Canada, the language of advertising is closely linked to the importance of the Francophone market. We were told repeatedly that national companies are generally motivated to market their products or services in French as well as English. These companies do not wish to ignore an entire portion of the market on the basis of language. For them, it simply makes good business sense to communicate in the language of their target audience.

In most interviews, the Francophone market was defined in terms of the province of Quebec. Other than at the National Capital Commission, we found little recognition of the Francophone market outside Quebec. Although this market represents almost one million Canadians,⁷ we were told it is not deemed large enough to make French-language advertising cost effective outside a national campaign that would include Quebec.

The importance of the Quebec market explains why organizations that currently require that ads be in both languages and whose publications are distributed nationally meet little resistance from national companies. French-language advertising is nothing new to them and they possess the resources needed for preparing ads in both languages.

7. According to the 2001 Census, French is the first official language of 936,335 Canadians outside the province of Quebec.

The National Capital Commission cited similar considerations, albeit on a regional scale for some of its publications, to account for its ability to require that ads be bilingual without deterring potential advertisers. As noted above, the Commission finds that private companies are not surprised by the language requirement given the Commission's mandate related to activities in the National Capital Region where both linguistic groups are well represented.

Organizations that do not require bilingual ads presented a different viewpoint. In discussions concerning ads in the Arts Centre and National Gallery of Canada publications, we were advised that some companies consider their market to be Anglophone, even in the National Capital Region, and see little value in a bilingual ad or a separate French-language ad. This kind of statement begs the question as to whether these companies are provided with data on the demographic reality of their clientele or the publication's readership.

2. Linguistic Format

The importance of the Francophone market often overlaps with a publication's linguistic format to determine the language or languages of a given ad.

Several nationally distributed publications covered in this study are issued in distinct English and French versions (Canadian Tourism Commission's *TOURISM* and *PureCanada*, Foreign Affairs and International Trade's *Bon Voyage, But...* and Industry Canada's *SchoolNet*). Two others (VIA Rail's *Destinations* and Canada Post's *SmartMoves*) separate the two languages but attach them in tumble format. However they are distributed, the separation of the English and French versions lends itself to two-language advertising. It is widely

accepted that advertisements and sponsorships should appear in English in the English version of a publication and in French in the French version.

The decision to issue a publication in separate English and French versions or in tumble format ensures linguistic consistency between advertising and content. However, some of these publications attract local and regional advertisers that do not always possess a bilingual capacity for producing material in the other language. When this occurs, an organization might provide translation assistance or allow the option of advertising in only one language version of the publication.

Bilingual ads are a harder sell for organizations whose publications present both languages in side-by-side format, such as Air Canada's *enRoute*, the National Gallery of Canada's *Vernissage* and, to a somewhat lesser extent, the National Arts Centre's *Prélude*. In all three cases, most companies decide to place advertisements only in English. By way of explanation, one interviewee suggested that Anglophone companies are more attracted to some publications than Francophone ones. Another referred to a particularly detailed unilingual ad, stating that creating an effective bilingual version of the ad would be difficult and that, as an alternative, adding the other language version as a separate ad would require additional advertising space. Whatever the reasoning, we found considerable concern that a bilingual requirement for ads in *Vernissage* and *Prélude* would deter potential advertisers and thereby reduce a revenue source that directly defrays production costs.

As noted above, *enRoute* has seen a noticeable increase in recent years in the percentage of advertising appearing in both languages. Although circumstances prevented us from discussing the situation with responsible officials, the

Corporation's written response identified several positive initiatives (notably, advantageous pricing for two [English and French] ads, promoting Canada's bilingual status and providing demographic data) which may account for the increase and lead to further improvement.

In the case of the National Arts Centre's *Prélude*, the use of the same booklet for inserting production notes for all disciplines appears to offer little incentive for advertisers to target the region's significant French-speaking population in their own language. We understand that marketing considerations, notably distribution levels, operate against a distinct set of advertising in the *Prélude* distributed for productions by the Centre's French Theatre Company. The issue of overwhelmingly unilingual English advertising nonetheless applies to the booklet used for all productions, which attract both English-speaking and French-speaking audiences.

We believe that more can be done to encourage a greater visibility of French in the advertising component of the booklet. This would be in keeping with the Centre's current strategic plan which, among other things, calls for expanding French-language programs and initiatives, finding new marketing and customer initiatives "to make sure our francophone customers find the National Arts Centre sensitive to their needs", and "dramatically" increasing earned revenues.⁸ Actively soliciting French-language businesses as advertisers in *Prélude* would make an important contribution to the Centre's current plan.

8. "Restoring the Vision: 2001-2006", National Arts Centre, September 10, 2001.

3. Alternative Advertising Vehicles

Interviewees referred us to the competitiveness of the marketing business as a relevant consideration. We were frequently reminded that each publication under review represents only one of any number of means for private enterprises to promote their products and services. Alternatives include other publications and media, few of which come with bilingual requirements, and even word-of-mouth. The organizations associated with the publications must therefore maximize the attractiveness of their magazines and brochures as advertising vehicles compared to other options available to their potential clients.

The perceived impact of linguistic considerations on the marketability of each publication to advertisers varies considerably. Officials at Canada Post and Foreign Affairs explained that the uniqueness of their publications, one aimed at people in the process of moving and the other at people travelling abroad, and the elevated spending habits of their respective readers, enable them to be highly selective in their advertisers and sponsors. The situation also enables them to impose a bilingual requirement for all ads and sponsorships without risk. Neither organization has lost an advertiser or sponsor for linguistic reasons, even though some may have little experience advertising in French.

The situation is not the same for all organizations. As noted elsewhere, some consider it worthwhile to offer translation assistance or the option to advertise or place sponsorship messages in only one language version of the publication. Others offer special rates for two ads, one in English and one in French, compared to a unilingual ad. In taking such steps, organizations enhance the attractiveness of their publications among advertisers.

Other organizations are more reluctant to draw attention to linguistic considerations in their marketing relationships. Where a publication is not bringing in sufficient advertising income to cover production costs, officials are understandably wary of any issue that could be perceived as problematic by potential advertisers. It would nonetheless seem to be in their interest to make their publication as attractive as possible to the maximum number of potential advertisers by exploring the kinds of initiatives taken by others.

4. Translation Assistance

Most organizations that require bilingual ads or sponsorship messages offer translation-related assistance. The National Capital Commission also offers to help with creative design to ensure that the use of two languages in an ad does not adversely affect the message's effectiveness. In the case of VIA's *Destinations* magazine, the firm responsible for advertising facilitates translation assistance if required.

These organizations see value in helping private companies with translation needs. When asked about the costs of doing so, officials pointed out that many ads contain little text and therefore cost little to translate. More complex ads entail a greater investment. We were advised that, like most business decisions, translation assistance should be seen on the basis of a cost–benefit analysis. Perhaps the clearest example of this was a multi-page text from a private sector partner which the publisher translated at considerable cost. The decision to translate the document hinged on the added value the text brought to the publication.

As bilingual organizations, all of those associated with the publications under review have the capacity to provide translation assistance to their

private sector advertisers. Nonetheless, some choose not to offer it. One official referred to administrative reasons for not providing translation assistance, suggesting that ads arrive too late to be translated. The experience of other organizations suggests that a solution could be found to resolve the problem. We believe it is reasonable to assume that financial considerations account for most situations where an organization decides not to draw from existing bilingual capacity to assist unilingual advertisers. Without questioning the legitimacy of financial considerations, we are uncertain in some cases about the extent to which the costs of translation assistance have been carefully weighed against the potential benefits, namely increased advertising revenue.

5. Private Sector Costs of Bilingual Advertising

Where a publisher does not provide translation, editing or creative assistance, the costs are borne by the advertiser or sponsor. These costs may account for resistance by some companies to bilingual requirements where they exist, but the costs in those cases are rarely such that companies are dissuaded from advertising in the publications in question. It is noteworthy that throughout our study we learned of few situations where a potential advertiser was lost due to a bilingual requirement. In one of those cases, the issue was not the cost of producing the ad in the other language but rather the company's concerns about providing service in the other language, an issue we examine separately.

We found that the cost to advertisers of producing their ad in the other language is sometimes compensated by other conditions. It was pointed out that, where publications are issued in separate English and French versions, companies get two advertising spaces for the price of one. Among the

publications in which the two versions are fully integrated, Air Canada's *enRoute* offers a special price for double ads.

In discussing the cost factor, some officials pointed out that bilingual publications cost more to produce compared to unilingual ones and that these extra "hidden" costs are generally passed on to other parties, including advertisers. It was nonetheless widely acknowledged that the cost of advertising in a bilingual publication comes with the benefit of exposure to both linguistic markets. This benefit is particularly strong with companies that do not normally advertise in the second language. By doing so in a bilingual publication, they reach out to a market that would otherwise be missed.

The issue is different with sponsorship messages. We understand that the organizations associated with the publications in question usually prepare and translate the text of the sponsorship message that concerns the program or activity being sponsored. In these cases, there are few if any language-related costs to the sponsors.

6. Bilingual Service Capacity

Several officials explained that national companies that routinely market their products and services in Quebec are accustomed to providing service in French. These companies show little resistance to bilingual requirements for advertising where they exist. (They may opt for unilingual ads where the choice exists, but this decision is influenced by factors other than bilingual capacity.)

One might expect the issue to arise where companies do not have a bilingual capacity. We were advised of one company, cited above, which refused to place an ad in the other language because it was uncomfortable with suggesting to potential clients reacting to the "second" ad that they could

be served in that language. However, we found no evidence that it is a general concern among unilingual companies that, in the case of some publications, make up a considerable proportion of all advertisers. Some officials stated that the issue had simply never come up.

It is nonetheless worth noting the response given to the company that was reluctant to place a bilingual ad for want of bilingual capacity. The publication's representative explained that members of the public do not necessarily expect a private enterprise to offer service in both languages based on a bilingual ad. While unsuccessful in this instance, the suggestion is a valid one for at least some types of companies and may be useful to others who find themselves in the same situation.

The other side of this issue concerns bilingual companies that place unilingual ads in bilingual publications. We identified several examples of national as well as regional companies that possess a bilingual capacity, yet choose to advertise in English only despite the opportunity to do so in French as well. One company's failure to advertise in French was described by an interviewee as incomprehensible. While acknowledging the role of other factors in such decisions, we believe that these companies may be particularly susceptible to renewed efforts to encourage more bilingual advertising and sponsorship messages.

7. Linguistic Balance

An alternative to bilingual ads is balancing the number of English only and French only ads, an objective adopted by the National Gallery for its *Vernissage* magazine. It remains to be seen how successful the Gallery will be in its efforts. Currently, only seven percent of all advertising space in the most recent issues of *Vernissage* comprise French-only ads.

For some time, the National Arts Centre has encouraged the firm responsible for its *Prélude* booklet to seek businesses that may be inclined to placing either a French-language or bilingual ad. The results have been disappointing with only one of 18 advertisers opting for a French-only ad in a recent issue of *Prélude*.

8. Third Parties

Most of the organizations under review do not have direct contact with their advertisers. Advertising in these cases is contracted out to private companies with marketing expertise. The company is usually paid on a commission basis for each ad sold. In one case, the advertising firm is the publisher and is fully accountable for the publication's costs. The implications are that those responsible for advertising in these publications are as sales driven, by necessity, as the companies from whom they are soliciting the ads.

We found a considerable degree of openness to linguistic duality in our discussions with private sector representatives in our study. We also established that language requirements are well understood where they are clear and explicit. The situation is less re-assuring where language requirements are lacking and where third parties are instead encouraged to solicit more bilingual or minority language ads with no written instructions and little apparent monitoring. There is some evidence that certain organizations associated with the publications in our study could work more closely with their marketing partners to achieve language-related objectives.

9. Government Role

Apart from steps taken by individual departments and Crown corporations to attract advertisers and sponsors to their publications, we found no evidence of the federal government playing a role in private sector decisions about the language of advertising in bilingual publications. Government support exists for Canada's private sector magazine industry but it does not appear to be language related. Heritage Canada has established numerous programs supporting linguistic duality outside the government. However, these programs tend to be oriented to non-profit organizations. We nonetheless understand that the Department is open to suggestions and to requests for assistance.

V. CONCLUSIONS

This study of the language of advertising and sponsorship messages in publications of organizations subject to the *Official Languages Act* provided our Office with a rare opportunity to examine the interaction of public responsibilities and business interests. Federal institutions and Air Canada have a responsibility under Part VII of the Act to promote our two official languages. The private sector meanwhile is naturally driven by market forces heavily oriented to maximizing sales and profits.

The study confirms that Canada's linguistic duality is strongly relevant to Canadian and international commercial interests in this country. Rooted in the significant presence of both official languages in our population, linguistic duality is not just a national value but also a marketing reality, one which motivates many national companies to promote their products and services in English and

French on their own volition. Many of these companies see opportunities to reach both linguistic markets in bilingual publications and readily accept requirements to advertise in both languages.

Another part of the reality is the tendency of other companies, national as well as regional and local, to advertise in these same publications only in English despite the option of reaching a wider market by placing a bilingual ad or adding a separate French-language ad. As more than one interviewee reminded us, these are business decisions. Advertising costs money, and bilingualism must bring added value to the ad for it to be justified. It is therefore interesting that the additional costs of bilingual ads are often found to be minimal and that translation-related assistance is offered by some organizations. Possible gaps within the private sector between the real and perceived costs of bilingualism merit serious consideration by those organizations that do not currently offer assistance.

Financial considerations also preoccupy the organizations associated with the publications. Understandably, there is little inclination to introduce language requirements if they could lead to fewer ads and reduced advertising or sponsorship income. However, the experience of those organizations that currently require bilingual ads and sponsorship messages indicates that the requirement, while not always met with enthusiasm, has rarely deterred potential private sector clients or partners.

The fact remains that each of the publications examined in our study is unique. The various considerations we identified as influencing the language of advertising and sponsorship messages do not apply similarly to each magazine, brochure and booklet. The study nonetheless allows us to conclude that those organizations where a language discrepancy exists between the editorial and

advertising content of their publications could benefit from a closer look at what makes their advertisers, sponsors and target audience tick, linguistically. They would do well to act according to what they learn in that it could lead to a more profitable business relationship for all concerned. Pro-active initiatives involving the private sector would also represent a meaningful contribution to the recognition and use of English and French in Canadian society, in keeping with their responsibilities under Part VII of the Act.

To assist the organizations in this endeavour, we attach in the Appendix a set of guidelines for promoting linguistic duality in commercial advertising and sponsorships.

Finally, we encourage Canadian Heritage to consider our findings carefully in reference to its co-ordinating responsibilities under Part VII and to its direct responsibilities related to, among other things, the business community. We hope this study will help the Department define a role for itself in publisher–advertiser relationships that influence the recognition and use of English and French in Canadian society.

APPENDIX

Guidelines for Promoting Linguistic Duality in Commercial Advertising and Sponsorships

The following guidelines are intended to assist federal institutions and other organizations subject to the *Official Languages Act* in fulfilling the government's commitment to "fostering the full recognition and use of both English and French in Canadian society" (paragraph 41(b)) by promoting linguistic duality in commercial advertising and sponsorship messages in their publications.

1. Consult current advertisers and sponsors

The first step to creating conditions conducive to linguistic duality in advertisements and sponsorship messages in bilingual publications is to consult the parties concerned. This is particularly important where the use of third parties for soliciting advertisements results in few direct dealings between organizations subject to the Act and their advertisers. It is difficult for an organization to address the language-related needs of advertisers and sponsors if the issue is not raised.

2. Unless already provided, conduct a cost-benefit analysis of providing translation-related assistance.

Translation costs for advertisements containing few words or short texts tend to be insignificant compared to other costs. Companies not accustomed to producing ads in both languages may be dissuaded from doing so by false perceptions of costs and efforts required. By actively offering translation assistance, a publisher may make the publication more attractive to more potential advertisers.

3. Provide potential advertisers and sponsors information on the linguistic demographics of the publication's readership.

The aim is to allow companies to make informed decisions concerning the language of advertising in the publication based on their targeted customers and the existence of

English-speaking and French-speaking markets in Canada. The information should include data on the French-speaking market outside of Quebec.

4. When using a third party to market a publication to potential advertisers, establish clear expectations related to the language of advertisements, confirm the expectations in writing and monitor results.

It cannot be assumed that private sector firms responsible for advertising fully understand the government's commitment to fostering the recognition and use of both languages in Canadian society or how this commitment applies to marketing publications of organizations subject to the Act.

5. Explore marketing strategies directed at French-language businesses

Unilingual English advertisements and sponsorship messages can be balanced by soliciting companies which prefer to market themselves in French only. This option may be more practical to publications with a regional distribution, although the study revealed at least a few examples of unilingual French advertisements in national publications. For whatever reason it is done, focussing on a new pool of advertisers and sponsors can generate additional revenue.

6. Promote the impact of linguistic respect on customer relations

A private enterprise may not be sensitive to possible negative perceptions by potential clients to advertising or sponsorship messages that are not in their language. Discussions with numerous officials with considerable marketing experience allow us to suggest that some clients may be inclined to pay more attention to ads in their own language. We also suggest that addressing clients in their own language helps personalize the message and establishes a more positive perception of the advertiser, and the publishing institution, by the target market.