



The Pharmaceutical Advertising
Advisory Board

REVIEW

Ray Chepesiuk,
Commissioner

Another Code PI Format Change Coming?

“Because things are the way they are,
things will not stay the way they are.”

— Bertolt Brecht

Are you happy with section 7.3 of the PAAB Code of Advertising Acceptance? The basic requirement of that section is to meet the needs of section 9(1) of the Food and Drugs Act (*i.e.*, the law). The PAAB Code section requires product information (PI) disclosure in a format that was introduced in 2007 after four years of consultation, format conception and design and then more consultation. The format, intended mainly for journal advertising, was created by a committee that included two creative directors and an agency president. When tested with sample product monographs, the format was at least the same length and possibly shorter in some cases. When tested with 100 physicians, nine out of 10 said it was an improvement over the previous format. So the PI committee thought they had accomplished something good—more legible PI in a similar length. The PAAB promoted the change through six different media for six months:

Some companies had not implemented the format to its full extent and that has resulted in a PI that is longer than the old format. As a result, some companies had decided to reduce their journal advertising, considerably in some cases. That had an impact on publishers' revenues which resulted in a request from Rx&D and CAMP to look at options to change that section of the code. The PAAB Board responded by striking a new PI committee consisting of the PAAB Chair and Commissioner, three publishers, an Rx&D member company official, a CMA representative and an agency GM. Their first action was to conduct a survey of Rx&D members. I would like to tell you the results of the survey.

Survey sent

The goal of the survey was to determine awareness of the new format and to determine a direction for the future. The PAAB received a list of 47 contact people from Rx&D member companies. Survey invitations were sent to all 47 companies. We determined that of the 47, 36 companies marketed healthcare products and that was our expected result.

Survey results

Twenty one companies responded to the survey. The first question had three parts.

Question one - part one

“Do you feel your company is aware of and understands the new PAAB Code revision (*e.g.*, the Code allows companies to reduce the amount of content in the PI)?”

—Seventeen answered “yes,” three “no” and one did not respond.

Part two

“How would you rate the impact that the new PAAB Code Revision has had on your company’s overall journal advertising for promoted prescription products since July 2007?”

—Of 19 responses, nine had “no impact,” eight said it had a negative impact and two said it had a positive impact.

Part three

“How would you describe the nature of the impact that the new PAAB Code Revision has had on your company since July 2007?”

—This was a qualitative response question that generated nine responses. Four said there was some reduction on journal spending due to increased costs, three said no impact and two said their medical/regulatory departments were challenged to adapt to the change.

Question two

“How would you rate the impact that the new PAAB Code Revision has had on the amount of information required and the number of pages required in your advertising vs. Full Disclosure Prescribing Information required previously?”

—Of the 17 responses, seven said “no change,” five said “more impact” and five said “less impact.”

Question three

“What is the impact that the new PAAB Code Revision has had on number of PI Pages/Space Required per ad?”

—Of the 17 responses, six said “no change,” seven said more impact and four said “less impact.”

Question four

“What is the impact that the new PAAB Code Revision has had on Total Number of Journal Advertising Insertions.”

—Of the 17 responses, nine people said “no change,” five said “less” and three said “more.”

Question five

“How would you rate the impact that the new PAAB Code Revision has had on your company’s total media spend for journal advertising in Canadian Medical Publications [Media Spending]?”

—Eleven said “no change,” five said “less spending” and one said “more.”

Question six

The PAAB Product Information Committee has come up with three potential options for the PAAB Code regarding PI and would like to obtain your feedback on these ideas as well as an additional suggestion you may want to bring forward. Please consider the following options:

- **Option 1:** No change
- **Option 2:** In Canadian Medical Publications, remove and replace PI with copy in a prominent location within the advertisement that directs the reader to the Health Canada Drug Product database
- **Option 3:** At a minimum of one to two years from the product being introduced to the Canadian market, provided there are no reports of unsuspected adverse effects of significance to warrant a warning letter from Health Canada or the manufacturer, the Prescribing Information could be removed from Canadian Medical Publications, with copy in a prominent location within the advertisement that directs the reader to Health Canada’s Drug Product database
- **Option 4:** Your suggestion

Option 3 generated the most interest with 13 responses indicating interest.

Summary

There appears to be wide awareness of the code format change. The committee agreed the results were not conclusive with respect to the impact of the new code format on journal advertising and it did not provide a strong directive for future changes. They agreed to ask the PAAB for funding for intensive one-on-one interviews with senior marketing officials to determine a course of action. Stay tuned.