



The Pharmaceutical Advertising
Advisory Board

REVIEW

Ray Chepesiuk,
Commissioner

Does the PAAB Stimulate Creativity?

"But out of limitations comes creativity."

— *Debbie Allen*

Would you sacrifice credibility for your version of creativity? Over the years, I have heard the allegation from some general managers of advertising agencies that the PAAB stifles creativity. I am aware that one GM said that his agency cannot produce a creative ad because of the PAAB code. Do his clients know that? I have also heard a very experienced Canadian creative director state that the PAAB does not stifle creativity; it actually enhances it. His point was that the tighter the requirements, the more creative you have to be. Going on, he said, "If you tell me I have to work only in black and white, I will give you a very creative black and white ad." So it depends on whose version of creativity you are talking about.

Let's face it, it is difficult to be creative at something on an ongoing basis. When you lose that creative ability, even temporarily, you tend to lash out at something easy to attack. There are positive ways to react to restrictions that end up in a high degree of creativity. I have thought Tim Robbins playing the accountant in the movie "The Shawshank Redemption" was incredibly creative, in not only escaping from prison but also setting himself up financially for the rest of his life. He did not have a lot to work with starting out, except a lot of adversity and limitations.

The PAAB Code of Advertising Acceptance does not have any provisions talking about creativity, per se. Therefore, PAAB reviewers do not comment on creativity. The PAAB Code contains provisions relating to regulatory, scientific, clinical and ethical principles and the PAAB reviewers are well trained in each of those subjects. I have not encountered many clients that have the same degree of knowledge in all four of those important areas. Therefore, the PAAB pre-clearance review service should be very helpful to advertising sponsors if they take the advice given during the PAAB review.

Section 2.1 states that you cannot present advertising in a way that misleads. We had difficulty in getting a company to revise an ad to acceptance because they were portraying a message of long-term permanence through a graphic when the product monograph showed a three to six month benefit. Potentially misleading? We have had an argument that a train heading for a broken train trestle was not conveying a disaster message, a message quite distant from the product monograph and that the PAAB was stifling creativity. The drug was not proven to prevent that degree of outcome so why portray that graphic in a product ad?

The PAAB reviewers are trained to look for false and misleading advertising with reference to the PAAB Code. False and misleading messages can be conveyed

Not for Sale
Unauthorized
display



in words, numbers and graphics or a combination of both. The context is always important. PAAB Code section 4 has requirements for proper data presentations. Some companies like to manipulate data in charts or graphs to make the data appear better in a misleading manner, or they omit important components of the data presentation. The PAAB is accused of stifling creativity when we say no to those messages.

There are positive ways to react to restrictions that end up in a high degree of creativity.

PAAB staff also applies Code section 2.5 that prohibits advertising that compromises the ethics of the health professionals receiving the advertising. To clarify that, the PAAB is not a censor. The reviewers act on precedent cases and also on input we receive from health professional organizations. For example, the Canadian Medical Association ethicists have asked the PAAB to not accept ads that portray people in unsafe conditions. People in ads should wear helmets, life jackets or have safety equipment shown because doctors advise people to be safe.

People in ads should not be smoking if the ad is not relevant to smoking cessation products. Why would that be difficult to accept and introduce in health product ads? When this has come up in reviews, the PAAB has been accused of stifling creativity. Really.

Health product advertising has a different set of rules than advertising for consumer products like soft drinks. The bottom line message is that the PAAB stimulates creativity in a positive manner and it stifles false and misleading advertising. That sometimes involves a message to rearrange words and graphics or not use them altogether. Sometimes agency personnel confuse that with stifling creativity. The PAAB staff understands and appreciates creativity in advertising directed to health professionals and consumers. After all, it is neither against the law nor unethical to be creative. The PAAB comments are designed to stop false and misleading advertising or advertising that compromises the ethics of health professionals even if the agency argues they are just trying to be creative. The PAAB stimulates credibility!

Edward de Bono once said, "A new thought only qualifies as 'creative thinking' if it has value." The PAAB adds value. I have many stories to substantiate that. **CPM**