



# REVIEW

Year 2010 marks the 34th year of the PAAB since its incorporation in 1976. To see the current edition of the PAAB Code, visit the PAAB Web-site.

**[www.paab.ca](http://www.paab.ca)**

Ce document est également disponible en français sur notre site web.

## PAAB MEETINGS

October 5, 2010 - Executive Committee

November 19, 2010 - General Meeting

## MISSION, VISION, VALUES

**MISSION:** To provide a preclearance review that fosters trustworthy healthcare communications within the regulatory framework.

**VISION:** Trusted healthcare product communication that promotes optimal health.

**VALUES:** Integrity, Competency, Credibility, Independence, Excellence, Transparency

## CLIENTS INVITATION

The PAAB commissioner is proud of the high level of customer service shown by the PAAB staff. We strive for continuous quality improvement. We remind you that the door to the commissioner's office is open to receive comments about PAAB activities or review issues. We would like to receive specific examples that caused satisfaction or dissatisfaction for the client to help identify trends for areas of improvement of the PAAB review service. Our Customer Experience surveys have not revealed negative comments that we were able to act on. We would like to document and investigate specific cases and take appropriate action. You can contact the commissioner at 905-509-2275 x28 and by email at [commish@paab.ca](mailto:commish@paab.ca).

## HEALTH CANADA MEETING

PAAB representatives met with Health Canada at a bilateral meeting between Health Canada and all of the sanctioned self-regulatory agencies on April 20, 2010 in Ottawa. [http://www.hc-sc.gc.ca/dhp-mps/advert-publicit/meet-reunion/rod-rdd\\_2010\\_04\\_20-eng.php](http://www.hc-sc.gc.ca/dhp-mps/advert-publicit/meet-reunion/rod-rdd_2010_04_20-eng.php)

## PAAB BUILDING

The PAAB is building new offices in Ajax, Ontario with the anticipated move date in Spring 2011.

## GUIDANCE ON DTC VACCINE ADS

On December 8, 2009 Health Canada issued "Interim Guidance on Fair Balance in Direct-to-Consumer Advertising of Vaccines". We have posted the guidance on the PAAB web-site [www.paab.ca](http://www.paab.ca) and it is available on the Health Canada web-site [http://www.hc-sc.gc.ca/dhp-mps/advert-publicit/pol/guide-ldir\\_dtca-pdac\\_vaccine-vaccins-eng.php](http://www.hc-sc.gc.ca/dhp-mps/advert-publicit/pol/guide-ldir_dtca-pdac_vaccine-vaccins-eng.php). It is similar in intent to s2.4 of the PAAB Code of Advertising Acceptance.

The PAAB can assist you to meet the regulations of DTC TV advertising for broadcast and print media. We have been doing it since 1990. The PAAB allows advertisers to include the PAAB logo on DTC material reviewed by the PAAB and that reach a "no further comment" stage. Prescription-requiring drug ads including drugs, biologics and vaccines directed to consumer television require a Telecaster number available from the Television Bureau of Canada. Telecaster will accept a letter from the PAAB as proof of valid review prior to authorizing a number. The PAAB provides a seamless review of advertising campaigns that include health professionals, patients and consumers.

Written opinions regarding Direct-to-Consumer Advertising of Prescription Drugs and opinions regarding whether an activity is advertising subject to the PAAB Code will be given to the client within 4 business days. Please use the PAAB eFile submission

system available at [www.paab.ca](http://www.paab.ca) and clearly indicate your request for an opinion. If you have any questions please call Glenn Golaz or Patrick Massad at the PAAB office 905-509-2275.

PAAB reviews include branded ads, help-seeking ads, web-sites and consumer brochures on all media including television and internet. Reviews are based on the Health Canada document "The Distinction between Advertising and Other Activities". PAAB will charge a review fee for written opinions, including e-mail (see Fee schedule on web-site). Advertisers should note that the PAAB members have agreed to the Health Canada request that it be copied on final versions of DTCARx material reviewed by the PAAB.

## NEW REVIEWER

The PAAB has added a tenth reviewer, Ms. Maxine Armstrong. Maxine completed her undergraduate studies in Nursing and Environmental Health at Ryerson University, and brings to the PAAB an extensive background of clinical, research and pharmaceutical experience. As a Registered Nurse, Maxine has acquired knowledge and experience in a variety of therapeutic areas working in acute care, research and with long-term care. In the pharmaceutical industry she further expanded her skill set working in clinical trials operations and medical affairs. An aspiring medical communicator, Maxine is currently working towards an MSc in Biomedical writing. She is excited about being a member of the PAAB team and is looking forward to developing in her new role as a PAAB Reviewer.

## PRODUCT INFORMATION (PI) COMMITTEE

The PAAB Directors have struck a code committee of various industry stakeholders to review how product information (PI) is delivered to the target audience in various media. Options will be reviewed and a suggestion to the board is expected to follow. Any changes will have to be within the current federal regulatory framework and the opinion of Health Canada will be sought.

## TRAINING WORKSHOPS

The PAAB conducts ad hoc training sessions at the request of pharma/biotech companies, agencies and suppliers. Check the PAAB web-site for details.

## CUSTOMER EXPERIENCE INDEX

The PAAB's primary role is to ensure that advertising of prescription drugs is accurate, balanced and evidence based. The PAAB staff strives to provide service that is accurate, transparent and prompt, demonstrating a high level of scientific and regulatory expertise in its reviews.

In late May, 2008, we introduced a Customer Experience Index Survey (CEI). This will provide the PAAB with a systematic and ongoing tool for client feedback, measuring administration, reviewers, management, general process and technology.

Clients who have had an APS accepted will be randomly selected to receive a survey involving 14 questions. If you get one, please complete it and send it back to us promptly. It is important to answer the questions regarding the referenced review file. It is the commitment of the PAAB to improve our customer service. Results for 2010 indicate a continuance of an 80% satisfaction level with the individual file that the client commented on. The PAAB commissioner is pleased with the results and is encouraging the staff to keep up the good work.

## SOCIAL MEDIA

Keep an eye out for the EyeForPharma "Pharma E-Marketing Canada" conference November 1 and 2, 2010. See "The PAAB" LinkedIn group for additional information or <http://www.eyeforpharma.com/emarketingcanada>

## REVIEW ACTIVITY

During the period of January 1 to June 30, 2010, the total number of first review submissions was 3055 with 16 files going more than 10 days on first review. This compared to 2214 during the same period of 2009. The PAAB now has 10 reviewers to handle the

review volume and some reviewers are averaging 6 day turnaround to first review.

## USE OF PAAB LOGO

We encourage you to show the PAAB logo on all material reviewed to acceptance (HP) or to no objection (DTC). The new DTC codes are CA for advertising and CI for information. The clearance period is for 12 months and please submit a renewal request if you wish to use the advertising for longer than 12 months. Two month extensions for exceptional circumstances can be granted by the commissioner.

## PAAB COMPLAINT REPORT

During the period of January 1 to June 30, 2010, the PAAB Commissioner processed 1 Stage 2 complaint.

In addition, PAAB has continued to regularly monitor journals, the Internet, and receive direct-mail/detail aid materials collected by health professionals as part of its monitoring program. When Code violations are discovered, PAAB sends a letter to the advertiser seeking their cooperation to meet the requirements of the Code. When appropriate, PAAB will notify the advertiser's trade association and/or Health Canada for their assessment of additional penalties.

## STAGE TWO DECISIONS

**1. ADVERTISER:** Odan Laboratories

**COMPLAINANT:** Sepracor

**SUBJECT:** Ni-odan mailer, detail aid

**PRECLEARANCE:** No

**ALLEGATIONS:** Several allegations regarding claims lacking consistency with Health Canada approval and unfair comparative claims. Because of an additional allegation that patient safety was being compromised the complaint was sent to Health Canada for review of the safety allegations with respect to Health Canada policy.

**DECISION:** No response from Health Canada as yet.

**OUTCOME:** Pending response from Health Canada

### For information or if you have comments:

Pharmaceutical Advertising Advisory Board  
375 Kingston Road, Suite 200  
Pickering, Ont. L1V 1A3  
Tel: (905) 509-2275 fax: (905) 509-2486  
e-mail: [info@paab.ca](mailto:info@paab.ca) [www.paab.ca](http://www.paab.ca)