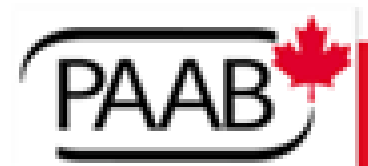


PAAB's 3 L's of Social Marketing in Canada

Jennifer Carroll
Trainer/Reviewer
PAAB



PAAB

VISION

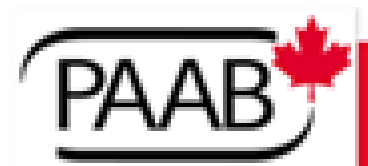
- Trusted healthcare product communication that promotes optimal health

MISSION

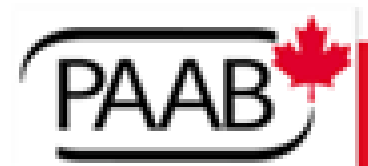
- To provide a preclearance review that fosters trustworthy healthcare communications within the regulatory framework for the benefit of all stakeholders.

VALUES

- Integrity, Competency, Credibility, Independence, Excellence, Transparency

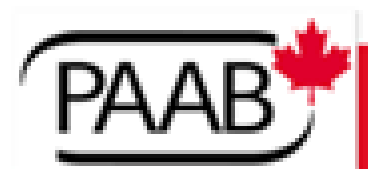


Localization, Localization, Localization



Localization

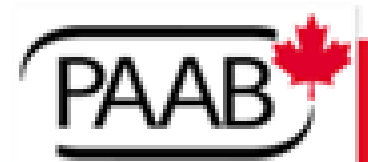
KNOW THE LOCAL REGULATIONS



1) Localization

Know the local regulations

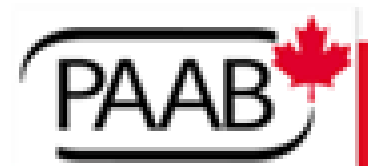
- PAAB code update:
 - Digital media has been an increasing medium for advertising within all jurisdictions including Canada
 - In 2011, based on commissioned research, the PAAB Board approved the creation of 4 expert committees, among them, the Digital Committee
 - Committees proposed changes to the code to more comprehensively cover digital activities



Know the local regulations, continued...

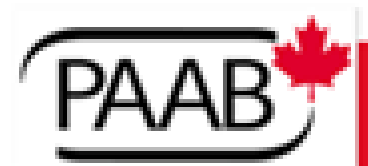
Online Committee Members:

- Ray Chepesiuk (Chair)
- Joanne Skedelsky, Pfizer (at the time)
- Deirdre Cozier, Sanofi
- Christian Otte, Amgen
- Alex France, Brightworks
- Brad Einarsen, Klick
- Fiona Birch, Tonic Global
- Patrick Massad, PAAB



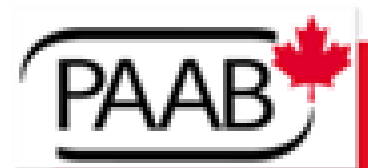
Know the local regulations, continued...

- A number of rounds of revisions
 - Included input from:
 - Industry
 - Formularies
 - medical associations
 - Health Canada
 - selected patient organizations
- Resulted in modernization of code section 6.5 of the PAAB code



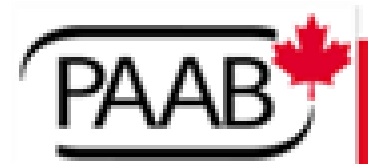
Know the local regulations, continued...

- New code:
 - Implemented July 1st, 2013
 - Transition period (almost over)
 - Full implementation by July 1st, 2014
- Multiple training points and guidance documents available on the PAAB website
 - www.paab.ca



Know the local regulations, continued...

Guidance	Status Quo Requirement	New Requirement
s6.5.1	Code regulations apply to ALL media	
s6.5.2		Manufacturer name on each web-page
s6.5.3	PAAB review contextual framework for UGC	
s6.5.4	Linkage principles	
s6.5.5	Banner or pop-up ads requirements	



Know the local regulations, continued...

Guidance	Status Quo Requirement	New Requirement
s6.5.6	Gating requirements	
S6.5.7	Ensure compliance with privacy law	
s6.5.8	Requirements for static online content	
s6.5.9	Requirements for dynamic content (site-generated or user generated)	
s6.5.10	Requirements relating to SEO	

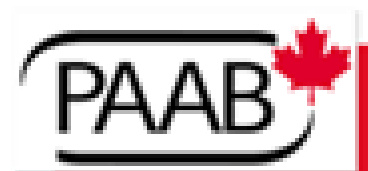
Know the local regulations, continued...

Guidance	Status Quo Requirement	New Requirement
s6.5.11	Requirements relating to SEM	
s2.10		Indication on first surface which has claims
s7.1 - 7.3		Replacement of PAAB format PI with an electronic link or a URL to a destination site containing the Product Monograph
Guidance document on F.B. positioning		Website/App fair balance positioning (indication + middle level fair balance on homepage)



Localization

GATING ACCESS



2) Localization

Gating access

- It is the sponsors responsibility to ensure sufficient mechanisms to determine the regulatory category of the person requesting the information online
 - Applies to websites, apps, other electronic platforms or networks

Gating access, continued...

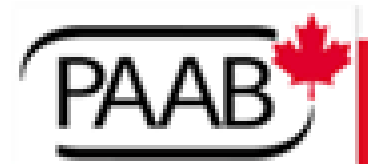
- Creating an acceptable barrier
 - Registration and/or attestation alone are NOT sufficient barriers
 - Password required for entry (controlled distribution)
 - DIN (for patients ONLY)
 - Professional License #
 - Arbitrary set of characters selected by manufacturer
 - URL of a website which is not indexed
 - “keys” which bypass the barrier (controlled distribution)
 - CD, webkey, email

Remember: Landing page is accessible by the consumer



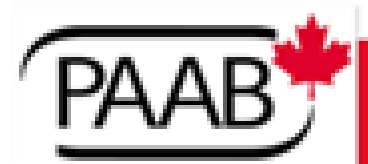
Gating access, continued...

- Links to global sites
 - HCP: Should be linked to the corporate homepage
 - Not brand specific pages – content may go beyond Canadian regulations.
 - Patients: Can link to corporate homepage
 - Should not be directed there for product information
 - Should not link to branded sites unless they have been reviewed by PAAB



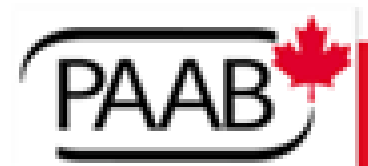
Gating access, continued...

- Link from ads/other gated websites
 - HCP's should not be required to enter a password when linking to fair balance.
 - By virtue of the fact that they have been exposed to advertising we should already have confirmed they are a HCP



Localization

SELECT SIMILARITIES AND DIFFERENCES WITH THE U.S.

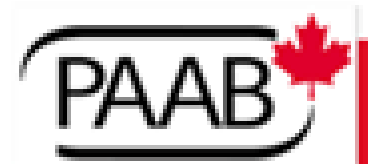


3) Localization

Select Similarities and Differences with U.S.

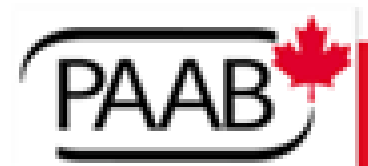
- Similarities:

- The sponsor is responsible for the content on sites that they own, control, create, influence or operate. May require monitoring.
- Submitting promotions of online content (i.e. tags, keywords, etc.)
- Disclosing sponsors involvement – PAAB code requires corporate name on all pages.



Select Similarities and Differences with U.S.

- Differences:
 - Canada: guidelines made by self-regulation -- U.S: made by government
 - Canada: Preclearance – US: NOT
 - Monthly resubmission of sites with user-generated content – in Canada we trust that unacceptable content will be removed.
 - PAAB provides guidance on monitoring systems
 - PAAB would pre-clear a standard bank of responses upon request.



In conclusion

**LOCALIZATION, LOCALIZATION,
LOCALIZATION**

