



Position Statement on Direct-to-Consumer Advertising (DTCA)

The Canadian Pharmacists Association recognizes that:

- ▶ patients, governments, pharmaceutical manufacturers and health care providers have a vested interest in achieving optimal drug therapy for all Canadians; and
- ▶ pharmaceuticals should not be considered as a consumer good but rather as a social good as one of the most cost-effective therapeutic interventions that exists today; and
- ▶ patients have a right to receive information on all therapeutic interventions available to them in order to participate in decisions about their health; and
- ▶ the information available to patients must be objective, accurate and comprehensive; and
- ▶ the media used to disseminate information must not encourage patients to seek unnecessary or inappropriate treatments thus increasing the risks to their health and the costs of our health care system.

Therefore, the Canadian Pharmacists Association:

- ▶ opposes direct-to-consumer advertising of prescription medications; and
- ▶ supports joint efforts by patient groups, governments, pharmaceutical manufacturers and health care providers to develop objective information about pharmaceuticals and disseminate it broadly in plain language.



Appendix I

DTCA Backgrounder

Definition

The World Health Organization (WHO) defines drug promotion as: “all informational and persuasive activities by manufacturers and distributors, the effect of which is to induce the prescription, supply, purchase and/or use of medicinal drugs.” By definition, the aim of promotion is to stimulate product sales.

The Situation

The Canadian Government has regulated Direct-to-Consumer Advertising fairly strenuously by restricting full advertising about prescription medications to health care professionals. It is mandatory for manufacturers to supply full monographs in professional journals for advertising purposes. Advertising to consumers has been restricted to the name, the quantity and the price of the medication.

As consumers' wishes for more information grow, manufacturers have been pressuring the government to allow for full advertising to consumers as has already been allowed by the Food and Drug Administration (FDA) in the United States.

Differences between Canada and the United States

The US considers health care as an industry and accordingly treat pharmaceuticals as a commodity that follows the market rules of supply and demand. It is therefore logical to them that the products should be advertised to increase manufacturers' market share.

In contrast to the US, the Canadian public health care system considers pharmaceuticals as one of the most cost-effective therapeutic interventions today, or as the National Forum on Health (NFH) report put it: In a fundamental sense, it implies that we do not wish to treat drugs as a “commodity”, on a par with shoes and ships and sealing wax, and that it is irrational and inconsistent with our broader objectives to do so.

The broader objectives alluded to by the NFH are those of our publicly administered health care system under which the Forum recommended that drugs be reimbursed as well as other health services.

The pressures from the US media spill over and the efforts by advertising concerns and pharmaceutical manufacturers are forcing Health Canada to seek a “made-in-Canada” solution that will address the following issues:

- ▶ advertising would increase physician visits and therefore increase costs to the health care system;
- ▶ it does not provide objective information since it's main aim is to sell more products;
- ▶ how can all stakeholders work together to provide information to the consumers who want it?



The World Health Organization Ethical Criteria

The WHO Ethical Criteria state that promotion of prescription medication and over-the-counter drugs:

- ▶ should be consistent with national health policies;
- ▶ should contain reliable claims, without misleading or unverifiable statements;
- ▶ should contain no omissions which could lead to health risks;
- ▶ should not be designed so as to disguise its real nature, for example as educational or scientific activities.

Thus far, these criteria are not well known or well used by regulators, health professionals, industry staff or the public.

The Pros and Cons of Advertising

The ethical dilemma of DTCA rests in the competing interest between marketing and health. The underlying problem is a tension between optimal use of medication only if and when they are known to improve health, and the pressure companies are under to continuously expand product sales. At stake here is whether consumer health or commercial interests are to be given priority.

Pros

- ▶ May help people in identifying their conditions
- ▶ Can provide medication alternative to their current medication

Cons

- ▶ May make people believe that they have a certain condition when they do not
- ▶ May increase physician visits
- ▶ May increase inappropriate prescribing because of patient pressures on the prescriber

One can also question if consumers could ever have enough information about their conditions, the array of medications available to treat them and the way the medication works in order to make fully informed decisions. It is doubtful that consumer-friendly information can ever come close to the training physicians and pharmacists have had to put them in a position to make optimal drug use decisions.

CPhA's Actions

For over five years, CPhA has been active on the issue and has participated in all government consultations on DTCA. Along with the Consumers' Association of Canada, we have made our concerns known to every Minister of Health. We are also participating in the consultation on the Legislative Renewal of Health Canada under which DTCA is specifically being addressed.



Next Steps

We believe that for a solution to be found there needs to be federal leadership on the issue and that all stakeholders should be involved in determining and implementing appropriate measures that will meet the needs of the Canadian environment. Moving forward on developing and providing objective and comprehensive information with the collaboration of consumer, manufacturer and health associations would satisfy Canadians' needs for more information to assist them in sharing in the decision-making about their health.