

CASE AUTH/2059/10/07

# PRIMARY CARE TRUST MEDICINES MANAGEMENT DIRECTOR v JANSSEN-CILAG

## Risperdal Consta journal advertisement

A primary care trust medicines management director alleged that an advertisement for Risperdal Consta (risperidone, long-acting injection) issued by Janssen-Cilag was misleading. The advertisement featured a lone female figure in a playground walking away from a trail of articles which included a doll, photograph album, wedding veil, handbag, toothbrush and hairbrush.

The complainant alleged that the advertisement depicted a child who was clearly under 18 years of age. The complainant's immediate opinion on seeing the advertisement was that Risperdal Consta could be prescribed for a young teenager. A doll lying on the ground reinforced this impression. Conversely the prescribing information stated that the product had not been studied in children and adolescents under 18.

The Panel considered that the photograph depicted a lone figure apparently walking away from her own possessions. The figure was casually dressed and had her back to the camera; it was impossible to know how old she was. The impression that the figure had possibly once owned the articles on the ground was compounded by the adjacent text 'Prescribe early, because what she loses, she could lose forever'. The Panel queried how many readers would interpret the articles, as submitted by Janssen-Cilag, as representing things that the girl might never have ie marriage, motherhood etc. Further, the statement 'Prescribe early' implied that the figure in the photograph was a young person. The Panel noted that the Risperdal Consta summary of product characteristics (SPC) stated that the product had not been studied in children or adolescents younger than 18 years. The Panel considered that it had not been made sufficiently clear that the girl in the advertisement was at least 18 years of age. In that regard the Panel considered that the advertisement was misleading as alleged and inconsistent with the SPC. Breaches of the Code were ruled.

A primary care trust medicines management director complained about an advertisement (ref RISP/C/06-0038) for Risperdal Consta (risperidone, long-acting injection) issued by Janssen-Cilag Ltd. The advertisement featured a lone female figure in a playground walking away from a trail of articles which included a doll, photograph album, wedding veil, handbag, toothbrush and hairbrush.

### COMPLAINT

The complainant alleged that the advertisement

depicted a child who was clearly under 18 years of age. The complainant's immediate opinion on seeing the advertisement was that Risperdal Consta could be prescribed for a young teenager. A doll lying on the ground reinforced the complainant's impression of a child. Conversely the prescribing information stated that the product had not been studied in children and adolescents under 18. The complainant alleged that the advertisement was misleading and should be withdrawn.

The Authority asked Janssen-Cilag to respond in relation to the requirements of Clauses 3.2, 7.2 and 7.8 of the Code.

### RESPONSE

Janssen-Cilag submitted that the advertisement used apparently 'dropped' articles as visual metaphors for the devastating effects of schizophrenia. It was meant to outline the potentially detrimental outcomes for individuals who suffered recurrent relapses of schizophrenia. These included the possible loss of beneficial behaviours, such as self hygiene and financial management and being denied the opportunity of experiencing life events enjoyed by non-affected individuals, such as marriage, childbearing and other interpersonal relationships

There was not, and never was, any intention to imply that Risperdal Consta should be used in children. The image did not represent an individual less than 18 years of age. The model featured in the advertisement was in fact 33 years of age. In addition, Janssen-Cilag considered that the style of both the handbag and its contents, the visual symbols of marriage (the veil), relationships (the photo album) were not consistent with articles commonly carried by, or associated with, 'young teenagers' or indeed with teenagers younger than 18.

Janssen-Cilag disagreed with the complainant's statement that the doll lying on the ground reinforced the impression of a child, as the average teenage girl would not carry a toy doll. The doll referred to potential motherhood, not the subject's own childhood, as should be clear from the context of the other dropped objects.

Janssen-Cilag stated that it had not received any other such comments or complaints about the advertisement. The company was convinced that the majority of health professionals seeing the advertisement would not gain the impression it was promoted the use of Risperdal Consta in children under the age of 18 years.

The company therefore denied breaches of Clauses 3.2, 7.2 and 7.8 of the Code.

#### **PANEL RULING**

The Panel considered that the photograph depicted a lone figure apparently walking away from her own possessions. The figure was casually dressed and had her back to the camera; it was impossible to know how old she was. The impression that the figure had possibly once owned the articles on the ground was compounded by the adjacent text 'Prescribe early, because what she loses, she could lose forever'. In that regard the Panel queried how many readers would interpret the articles as representing things that the girl might never have ie marriage, motherhood etc. Further, the statement 'Prescribe early' implied that the figure

in the photograph was a young person. The Panel noted that the Risperdal Consta summary of product characteristics (SPC) stated that the product had not been studied in children or adolescents younger than 18 years. The Panel considered that it had not been made sufficiently clear that the girl in the advertisement was at least 18 years of age. In that regard the Panel considered that the advertisement was misleading as alleged and inconsistent with the particulars listed in the Risperdal Consta SPC. Breaches of Clauses 3.2, 7.2 and 7.8 were ruled.

<b>Complaint received</b>	<b>17 October 2007</b>
<b>Case completed</b>	<b>14 November 2007</b>

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