



The Hong Kong Association of the Pharmaceutical Industry  
香港科研製藥聯會

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Content Regulation Section 1 – Consultation on Revision of Codes  
Broadcasting Authority Secretariat  
39/F, Revenue Tower  
5, Gloucester Road  
Wanchai, Hong Kong

*By fax & by email*

Dear Sir,

**Position Paper of The Hong Kong Association of The Pharmaceutical Industry  
on Provisions on Advertising of Nicotine Replacement Therapy Products  
in its TV and Radio Advertising Codes**

The Hong Kong Association of the Pharmaceutical Industry (HKAPI) very much appreciates the opportunity to provide its views on the public consultation on the Provisions on Advertising of Nicotine Replacement Therapy Products in its TV and Radio Advertising Codes carried out by the Broadcasting Authority.

Formed in 1968, the HKAPI currently has 42 full members that are all international companies engaged in the research and development of pharmaceuticals. Member companies of the Association provide over 70% of prescription medicines in Hong Kong. Our mission is to ensure patients have expedient access to innovative and effective drugs to enhance better health and quality of life.

To correspond with the Government's anti-smoking policy and legislation, the HKAPI supports the proposed amendments on the following grounds:

**Smokers' right to know.** Smokers who want to quit should have the right to know about smoking cessation products through different media including TV and radio. It is illogical to hinder awareness and restrict access to NRT products while cigarettes, which addict their users and are detrimental to one's health, are granted nearly unrestricted access.

**Advertising can increase awareness and usage of NRT products.** In Australia, regulations have been changed to allow wider advertisement of NRT products which resulted in the doubling of NRT usage. Recent liberalizations of NRT marketing in France and Brazil also lead to similar results. Studies by Shiffman (2005) reported that advertising of NRT products resulted in higher visibility and awareness of smoking cessation will attract more smokers into quitting and treatment.

**Reduction in cigarette consumption.** The increase in the sales of NRT products is also found to contribute to the reduction in cigarette consumption (Hu, et al., 2000) which can be a boost to the anti-smoking efforts by the government.

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**No evidence of adverse reaction from NRT products.** There have been no reported severe adverse reaction to over the counter NRT products in Australia to date (Paul, et al., 2003) and there is no evidence that the increased awareness of NRT products resulted in the abuse of these products (Bittoun, 2007). For example, SmithKline Beechman's surveillance efforts to track potential misuse of nicotine gum after its introduction to US OTC market did not find any significant abuse among youth and misuse by smokers (Pinney Associates, 2000).

To ensure safe use of NRT products and to adhere to the principle of protecting children and youths, the HKAPI agrees that the advertisements for NRT products should not be shown within or in proximity to children's programmes and should make it clear that the advertised NRT products are aids for smoking cessation but not a cure to smoking addiction.

### **Nicotine replacement therapy (NRT) products**

Nicotine replacement therapy refers to the use of various forms of nicotine delivery methods, including nicotine patch, inhaler, nasal spray, gum, sublingual tablet, and lozenge to replace nicotine obtained from smoking or other tobacco usage. These products are intended for use in smoking cessation efforts to alleviate withdrawal symptoms and cravings.

A number of studies have demonstrated the effectiveness of NRT products, for example, it is found that the quit rate with the use of NRT products are 1.5 to 2 times higher than that in the placebo or control treatment condition (Stead. et al., 2008).

The World Bank report "Curbing the Epidemic: Governments and Economics of Tobacco Control" also addressed the importance of the NRT products as one of the efficient tobacco control tools and recommended to widen access to nicotine replacement and other cessation therapies.

Countries including Australia, US, Canada have already allowed the advertising of NRT products on TV and radio. Further deregulation in US and Australia has made NRT products available for general sale in 1996 and 2006 respectively.

In conclusion, we believe that in an open society like Hong Kong, the channels of communication to consumers for their awareness of their choices of effective ways to quit smoking shall be enhanced and further opened up. Hence, the HKAPI supports the proposed amendments on the Provisions on Advertising of Nicotine Replacement Therapy Products in its TV and Radio Advertising Codes.

Thank you for your attention.

Yours sincerely,

Sabrina Chan  
Executive Director

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