

The European Federation of Magazine Publishers

comments

“The legal proposal on information to patients” of the European Commission

Consultation deadline: 7 April 2008

Brussels, 4 April 2008

The European Federation of Magazine Publishers (FAEP) is a non-profit organization representing the interests of the national associations of periodical press publishers and corporate publishing members in Europe.

FAEP represents over 15.000 publishers throughout Europe (the vast majority being Small and Medium Sized Enterprises) publishing over 50.000 magazine titles in Europe, reaching on average 80% of European adults. 300 million Europeans read magazines on a regular, consistent basis. And this is reflected by the fact that more than 20 billion copies of magazines are sold every year in Europe.

Through their interests, demands and needs, it is the readers who indirectly ‘create’ the content of the magazines they read. In their print and online publications, magazines cover all topics of interest for their readers. It is no surprise therefore that magazines cover on a regular basis issues related to health, disease and treatment.

FAEP appreciates the invitation to comment the “the legal proposal on information to patients”, published by the European Commission in early 2008.

Magazine publishers react, as much as any other media these days, to an increasing demand by citizens across Europe for trustworthy health information. In these comments, FAEP would like to elaborate **(1)** how the changing role of the patient in the EU affects the **(2)** demand for high quality information and therefore the **(3)** role of the periodical press as an important way of disseminating patient information. **(4)** Finally we would like to state how we see the distinction between “advertising” and “non-promotional information” in this context.

(1) Role of an informed patient:

As the analysis in the draft legislation shows, patients “are increasingly involved as managers of their health”. The patient is increasingly playing an active role in gathering information about his/her disease and possible treatments. Although the demand for more information and qualified information is continuously growing, the access to this information in Europe is limited today.

The legal situation in Europe does not allow the provision of information on prescription drugs to patients and therefore restricts quality information. This limitation is unacceptable in the light of the responsible European citizen who obviously is looking for information to empower him/herself.

FAEP therefore welcomes the initiative of the European Commission to adjust the legal framework for patient information. This should be done in a way that all patients in Europe have access to high quality information in their own language in an understandable and trustful manner.

Over the last years the editorial content in magazines related to health information has increased significantly. Magazines reacted to the growing demand of their readers to receive quality health information. Magazine brands are considered as trusted sources for all kinds of information, especially on topics readers do not want to share with their family and friends in the first place.

Further more magazines are a media that is easily accessible for all groups of society regardless of age, education, gender and socio-economic conditions. Magazines provide information in a structured, understandable way, often accompanied by pictures and graphics that help to illustrate the information provided.

Therefore magazines are one of the most relevant media while considering effective ways of giving all patients access to understandable, well structured health information in their own language.

(2) Reliable and good quality information

FAEP shares the view that understandable, high quality, reliable and validated information is the key for a sustainable and trustworthy health information concept across Europe. To ensure high quality information to patients the source has to be trusted and the information has to be validated.

FAEP is convinced that it is possible to define a set of quality standards for patient information that can be validated, monitored and adjusted. The architecture of such a validation process could be based on the principle of self-regulation.

Self-regulation works very well in most EU Members States since decades. Self-regulatory systems are flexible and perfectly adjusted to the national circumstances, regarding the culture, the legal framework, the way business operates and the society's expectations.

(3) Disseminating information: the role of the periodical press

Once validated high quality health information is available, the printed press (magazines) should not be excluded as a means of disseminating this reliable high quality health information.

FAEP supports the approach presented in the report that not only the internet but also non-electronic media should be considered as relevant media in order to allow the access to information to patients for all parts of the population. In fact, as many people do not have access to the internet and therefore would be excluded from the relevant high quality health information, it should be made possible to publish patient information in the print media.

The periodical press can be seen as an appropriate media for health information as magazines are perceived by their readers as a trustful source of information. Strong magazine brands help the readers to navigate through a world of information overflow.

According to the reader's interest and priorities, each group within a society has its personal portfolio of magazine titles that helps to select information. Taking this into consideration magazines are a trustworthy media with a close and intimate relationship to their readers. Informing readers about sensitive information, like health information, is one of the key tasks for magazines. They do it seriously and responsibly.

FAEP does not share the questionable view that print media is a push media: the nature of reading is completely different than the reception of "pushed" sequences of images and sounds. Furthermore readers of magazines choose their magazine according to their interest and needs. They pay for the magazine and read only the parts they are interested in.

The periodical press is a primary source for health information, also according to the study "Patient empowerment ... information behaviour among cancer patients", quoted by the draft report (footnote 12, page 13). This study looked at eight typical sources of information for cancer patients (e.g. oncology, print, internet, general practitioner, self-help group etc.) that fulfil the criteria "comprehensive", "correct and high quality", "helped in coping with the illness" and "on the whole satisfactory".

The study "Patient empowerment ... information behaviour among cancer patients" shows that in the category

- “comprehensive information” print is the preferred source of information with the same acceptance as “oncology”, followed by “internet”;
- “clear and understandable” print is on number three after “oncology” and “self-help-group”, while “internet” is on number six;
- “correct and high quality” print is on number two right after “oncology”, while “internet” is far behind on number six;
- “Helped in coping with the illness” print is number one followed by “self-help-group” and “oncology”. “Internet” is number six;
- “Overall satisfaction” print is number two right after “oncology”, while “internet” is number 5.

This should not indicate that “internet” is not appropriate for patient information. It just shows that print media are equally and in most categories even more appropriate to satisfy the demand for information to patients.

(4) Distinction of “advertising” and “non-promotional information” in this context

FAEP supports the EU Commission’s proposal to allow “information to patients” as “understandable, objective, high-quality and non-promotional information about the benefits and the risks of their medicines, [...] which maintains the confidence of citizens, regulators and healthcare professionals”.

Specific information on a specific drug, e. g. a concrete text, that is approved by the relevant independent body as “non-promotional information” according to the criteria and the procedures defined in the future legislation will keep this status of “non-promotional information” independent on the way of dissemination that will be used. In particular, it cannot lose this character by being disseminated via magazines or other print products (see also point 3). FAEP would therefore consider any concrete information, approved according to the rules of this legislation as “non-promotional”.

This conclusion is supported by the following: The responsibility for the content of this “information to patients” lies at the independent body, who decides whether or not the information fulfils the relevant criteria. If it was “advertising” it would inform the reader about a product or service from a single company’s or organisation’s point of view: So the company behind the product or service promoted in the ad is responsible for its content.

Consequently this approved non-promotional information must be available for dissemination in print media.

Conclusion

FAEP therefore strongly supports the draft legislation's approach to allow the dissemination of validated quality health information in Europe in order to give all citizens access to information they are asking for. No media should be excluded from disseminating this validated health information as each media serves a specific target group in a way that has been evolved over decades and is adjusted to the cultural and societal circumstances it operates in.

Magazines are a media with a notably close and intimate relationship with large parts of the society and therefore feel appropriate to disseminate health information. As patients indicate a preference for structured and concise information, clear headings, important sections highlighted, short blocks of text and a good index, again magazines are exactly providing information according to these criteria.

We thank you for taking our concerns into consideration.

Please do not hesitate to contact us for further information you may require.

Yours sincerely,

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and Sustainability

Please contact for any questions you might have:

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