

Up Front

Deal with Lack of Guidelines by Developing Best Practices

Pharma's interest in social media is a global phenomenon, which is something I discovered when I solicited nominees for the Pharmaguy Social Media Pioneer Award. Many of the people on the list worked for non-U.S. based pharmaceutical companies.

In 2010, I was invited to the Germany and the UK to present at conferences about what's happening with FDA regulation of pharma social media efforts here in the U.S. and its impact on pharmaceutical marketing elsewhere in the world. I discovered that there's a lot of interest in the EU about FDA regulatory actions and plans because regulatory agencies around the world often follow FDA's lead.

But the fact that the FDA hasn't issued any official guidelines for social media has not stopped European-based pharma companies from initiating ground-breaking social media campaigns, albeit non-branded ones.

I learned about these EU pharma social media campaigns at the September, 2010, Digital Pharma conference in London, where I met Alex Butler and Gary Monk. Both work in the UK for Janssen-Cilag, which is a member of the Johnson & Johnson family of companies.

Butler is the Digital Strategy and Social Media Manager at Janssen. He received the Hawaiian shirt off my back in October, 2010, as the winner of the Pharmaguy Social Media Pioneer Award primarily because he lead the way in developing one of the first pharmaceutical Facebook pages that allow comments to be published without pre-screening. I'm referring to the the Psoriasis 360 Facebook page, which is part of a larger disease-awareness campaign.

"We believe strongly that people should be able to share their views in an open a manner as possible for a regulated industry and the commenting policy reflects this attitude," said Butler.



Of course, Janssen reserves the option to remove any comments "if they directly talk about medication or could be offensive to people."

Meanwhile, Gary Monk, Product Manager-Concerta XL, Janssen, launched the LivingWithADHD YouTube Channel. This YouTube channel also allows comments. The

"Commenting Policy" states "All submissions will be reviewed and may not be posted if deemed inappropriate. Comments which are off-topic, offensive, or promotional, will not be posted. Please note that we will not post comments about any specific products or treatments, whether they are sold by Janssen-Cilag Ltd or not."

Monk says that Janssen-Cilag has published the "vast majority" of comments.

What does the FDA think about that? We don't know. But it hasn't stopped Janssen from forging ahead. Of course, Psoriasis 360 and LivingWithADHD are intended for European audiences and are not subject to FDA regulations. Nevertheless, they have established best practices for how the industry should engage with consumers on social media sites.

My next trip to Europe will be to Milano, Italy, where I will speak at the 6th Annual Pharma Marketing & Branding Excellence conference.

The title of my presentation is "A Social Media Strategy: Deal with Regulations, Develop Best Practices." When I suggested this topic, I was pretty sure the FDA would have issued some guidance on how the industry should apply FDA regulations to social media communications. Now, however, it appears that the industry will have to continue to trudge along without guidance. That's fine, because guidance or no guidance, best practices in social media communications is still evolving and there will be plenty for me to talk about.

John Mack, Editor

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