



Advertising Guidance

Amends to copy permitted without resubmission

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It is a requirement of PAGB membership that all consumer facing advertising for medicines and food supplements is submitted to PAGB for review. However, there are two types of circumstance where PAGB does not need to review the final version of an ad:

- 1) If the copy has been approved on condition (i.e., stamped “approval with conditions”), it is considered approved provided you fulfil any requirements as instructed. Resubmission is only necessary if you are making a change different to that requested.
- 2) Minor, immaterial changes to an ad previously approved by PAGB (that is, amends that result in no significant change to the meaning of the original content). These limited changes involve:
 - Resizing an ad in its entirety or using the same content in a different media, provided all the text remains legible.
 - Adding a retailer tag.
 - Changing ‘Always read the label’ to ‘Read label’ due to limited space (for example, in paid for search advertising). Applies to medicines copy only.
 - Updating or changing pack shots, provided essential information and claims are not affected.
 - Changing the colour or position of design elements.
 - Changing the font type or size, provided this does not impact any of the following: minimum size requirements where applicable, legibility of essential information or authorised health claims, or relative prominence of original content i.e. parts of claims should NOT be reduced to footnotes.
 - Adding subtitles that match the voice over to approved online videos.
 - Replacing an image with a like for like image – a swap that essentially shows the same thing. For example, replacing an image of an older woman laughing with an image of another older woman laughing would be acceptable without resubmission. Whereas, replacing it with an image of child laughing or an older woman in pain would not.
 - Removing an entire claim in a way that does not impact on the meaning of the remaining claims. For example, amending “Fast, effective relief” to “Effective relief”.
 - Changing information on brand websites that is unrelated to products, such as, company contact details or terms and conditions.

If you are unsure whether you need to resubmit copy following a minor amendment, please contact the copy clearance to confirm the appropriate course of action.

PAGB's Codes of Advertising Practice, guidelines and additional guidance are available at www.pagb.co.uk/codes-guidance. Log in to the members' area to access the full range of guidance. For more information, contact info@pagb.co.uk.