COMPLAINANT v PFIZER

Legibility of prescribing information

A contactable complainant, who described him/herself as a concerned UK health professional, alleged that the prescribing information on Pfizer's PfizerPro website for Xeljanz (tofacitinib), Sutent (sunitinib) and Champix (varenicline) was very difficult to read and that there might be other examples.

The detailed response from Pfizer appears below.

The Panel noted that Clause 4.1 required that prescribing information be given in a clear and legible manner and the supplementary information listed recommendations to help achieve clarity. The Panel noted that the prescribing information at issue was published on a website and therefore the recommendations in the Code needed to be considered in the context of digital material.

The Panel noted Pfizer's submission that the prescribing information font size on the pages in question was such that all lower-case characters were approximately 2mm in size when viewed via Google Chrome on a standard desktop device under the default factory zoom setting of 100%. The Panel also noted Pfizer's submission that line-spacing and font-type were selected to facilitate easy reading and that the font-colour was dark grey on a white background and emboldened headings were used at the start of each section.

The Panel noted Pfizer's submission that the website at issue had been designed so that the character line length was determined by the size and orientation of the device screen or window being used as well as the viewer's personal zoom settings applied on his/her device. The Panel noted Pfizer's submission that for the prescribing information identified by the complainant, the average line character length, with factory zoom settings enabled, ranged from approximately 50 characters on a small smart phone to approximately 100 characters on a desktop device. The Panel noted Pfizer's submission that the text line length might occasionally exceed 100 characters on a desktop device, however, given the other legibility measures in place, Pfizer did not consider that this would impact the overall ease of reading the prescribing information on the website.

The Panel noted that the complainant had provided links to the webpages in question, however, he/she did not provide information regarding what device (smart phone, tablet, desktop) he/she had used to read the information and its settings. Nor had the complainant explained why he/she found the prescribing information difficult to read. The Panel noted that the screenshots provided by Pfizer appeared to be of the webpages as viewed from a desktop.

The Panel had some concerns with regard to the impact of the character line length when viewed from a desktop device, and the use of grey coloured font, on ease of readability.

The Panel considered that, on balance, based on the evidence before it, the prescribing information for Xeljanz, Sutent and Champix on the webpages at issue was on the limits of acceptability in terms of legibility and no breach of the Code was ruled.

The Panel noted that the complainant stated that there might be other examples of medicines where the prescribing information was difficult to read and that the entire site should be reviewed. The Panel noted Pfizer's submission that it had reviewed the prescribing information provided across the PfizerPro website and had not been able to identify any legibility issues. The Panel noted that the complainant had the burden of proving his/her complaint on the balance of probabilities. All complaints were judged on the evidence provided by the parties. The complainant had provided no evidence to support his/her allegation regarding other medicines and no breach of the Code was ruled in this regard.

A contactable complainant, who described him/herself as a concerned UK health professional, complained about the legibility of prescribing information on Pfizer's PfizerPro website. The products in question were Xeljanz (tofacitinib), Sutent (sunitinib) and Champix (varenicline).

COMPLAINT

The complainant alleged that the prescribing information for medicines including Xeljanz, Sutent and Champix on Pfizer's website (https://www.pfizerpro.co.uk/product) was very difficult to read and that there might be other examples; the entire site should probably be reviewed.

When writing to Pfizer, the Authority asked it to consider the requirements of Clause 4.1.

RESPONSE

Pfizer submitted that it had reviewed the prescribing information provided across the PfizerPro website and had not been able to identify any legibility issues.

Pfizer noted that Clause 4.1 required all promotional material to include clear and legible prescribing information. The recommendations in the supplementary information to Clause 4.1 might help achieve clarity, particularly in the case of printed materials, however the company did not consider that, for prescribing information to be deemed

legible, each individual recommendation had to be implemented, particularly in relation to digital materials. Pfizer, however, reviewed the prescribing information identified by the complainant against these recommendations as a potential indicator of legibility. Screenshots of the webpages hosting the prescribing information for Xeljanz, Sutent and Champix were provided.

Font size

Pfizer submitted that the prescribing information font size on the pages in question was such that all lower-case characters were approximately 2mm in size when viewed via Google Chrome on a standard desktop device under the default factory zoom setting of 100%. This size would, however, change if the desktop window was minimised or the pages were viewed on a mobile device.

Line length

As PfizerPro had been designed as a 'responsive website', the character line length was determined by the size and orientation of the device screen or window being used as well as the viewer's personal zoom settings applied on his/her device. For the prescribing information identified by the complainant, the average line character length, with factory zoom settings enabled, ranged from approximately 50 characters on a small smart phone to approximately 100 characters on a desktop device. The text line length might occasionally exceed 100 characters on a desktop device, however, given the other legibility measures in place, this did not impact the overall ease of reading the prescribing information on the website.

Line spacing

The spacing between the lines of text was set at 1.4 which was designed to facilitate easy reading of the prescribing information.

Font type

The site was designed using an FS Albert font which was a standard, simple, widely used website font selected to facilitate easy reading on electronic devices.

Font colour and contrast

The prescribing information was provided in a dark grey font on a white background in order to provide optimal contrast between text and background.

Headings and section breaks

Emboldened headings were used for the start of each section and in many, but not all cases, each section started on a new line.

In conclusion, Pfizer considered that the prescribing information for the three medicines identified by the complainant was presented in a legible, easy to read format on the PfizerPro website, consistent with the requirements of Clause 4.1.

PANEL RULING

The Panel noted that this complaint should be considered under the requirements of the 2016 Code. The Panel noted that Clause 4.1 required that prescribing information be given in a clear and legible manner. The supplementary information to Clause 4.1, Legibility of Prescribing Information, in the 2016 Code, listed the following recommendations to help achieve clarity:

- type size should be such that a lower case letter 'x' was no less than 1mm in height
- lines should be no more than 100 characters in length, including spaces
- sufficient space should be allowed between lines to facilitate easy reading
- a clear style of type should be used
- there should be adequate contrast between the colour of the text and the background
- dark print on a light background was preferable
- emboldening headings and starting each section on a new line aids legibility.

The Panel noted that the prescribing information at issue was published on a website and therefore the recommendations in the supplementary information to Clause 4.1 regarding legibility of prescribing information needed to be considered in the context of digital material.

The Panel noted Pfizer's submission that the prescribing information font size on the pages in question was such that all lower-case characters were approximately 2mm in size when viewed via Google Chrome on a standard desktop device under the default factory zoom setting of 100%. The Panel also noted Pfizer's submission that line-spacing and font-type were selected to facilitate easy reading and that the font-colour was dark grey on a white background and emboldened headings were used at the start of each section.

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The Panel considered that, on balance, based on the evidence before it, the prescribing information for Xeljanz, Sutent and Champix on the webpages at issue was on the limits of acceptability in terms of legibility and no breach of Clause 4.1 was ruled.

The Panel noted that the complainant stated that there might be other examples of medicines where the prescribing information was difficult to read and that the entire site should be reviewed. The Panel noted Pfizer's submission that it had reviewed the prescribing information provided across the PfizerPro website and had not been able to identify any legibility issues. The Panel noted that the complainant had the burden of proving his/her complaint on the balance of probabilities. All complaints were judged on the evidence provided by the parties. The complainant had provided no evidence to support his/her allegation regarding other medicines and no breach of Clause 4.1 was ruled in this regard.

Complaint received **29 October 2018**

Case completed **8 March 2019**