



Navigating and understanding Google regulations for pharmaceuticals

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Introduction

Many industries have to deal with regulatory processes with regard to search advertising. However, the regulations surrounding the pharmaceutical industry is particularly complex.

Our team decided to put together a research project specific to pharma, to help collect and plot all of the various search advertising regulations in an attempt to help others navigate the challenges with confidence.

In addition, we've also collected and presented data on the current and projected size of the addressable search market for the pharma industry.

Part One: Google's Policies for Paid Search

- According to [Google's policies](#), certain content that's related to healthcare and medicine can be advertised only when the pharmaceutical company has been approved by Google as a "[certified healthcare-related advertiser](#)". Certified companies can target ads in approved countries alone. Companies would also have to abide by [country-specific regulations](#) apart from Google's general ad policies.
 - Details on the country-specific restrictions for pharmaceutical companies can be accessed [here](#).
- Google allows pharmaceutical companies to advertise prescription drugs only in the United States, [New Zealand, and Canada](#) while over-the-counter drugs can be promoted in over [24 countries](#), which are the United States, the United Kingdom, Sweden, Spain, South Korea, Slovakia, Russia, Poland, Norway, New Zealand, Netherlands, Mexico, Japan, Italy, India, Hong Kong, Germany, France, Czech Republic, China, Canada, Brazil, Austria, and Australia. Medical professional suppliers and bulk drug manufacturers are allowed to advertise in [Canada and the United States](#) alone.
- Google Ads [closely monitors](#) any prescription drug that is being promoted by a certified healthcare-related advertiser. A list of the prescription drugs that Google Ads monitors can be accessed [here](#).
- While advertising online pharmacies is restricted in general, Google allows their promotion only in specific countries including the United States, the United Kingdom, Taiwan, Sweden, Slovakia, Portugal, Norway, [New Zealand, Netherlands](#), Mexico, Japan, Hong Kong, Germany, Denmark, Czech Republic, China, Canada, Brazil, Austria, and Australia.

- Google approves the promotion of an online pharmacy after reviewing the content of the [ad/app/site](#) along with the services and products it offers. Online pharmacies are also required to be certified by Google in order to [promote their products](#) through Google Ads. To qualify for Google's certification, online pharmacies would have to be "registered with the [relevant pharmaceutical authorities](#) in the countries that their ad campaign targets".
- Google has [separate policies](#) for specific products and services such as birth control and clinical trials. While the promotion of birth control products are allowed in many countries such as [Canada and the United States](#), Google does not allow birth control ads in several countries including Yemen, United Arab Emirates, Ukraine, Tunisia, Thailand, Syria, Saudi Arabia, Qatar, Palestinian Territory, Oman, Morocco, Libya, Lebanon, Malaysia, Kuwait, Jordan, Iraq, Iran, Hong Kong, Egypt, [Djibouti, China](#), and Bahrain. Where [addiction services](#) are concerned, Google allows the promotion of such services in the United States alone.
- Pharmaceutical manufacturers and companies tend to face challenges mainly with [personalized advertising](#) content. Google's personalized advertising policy states that marketers cannot serve advertisements that fall under the category of [sensitive interest](#) such as belief, identity, and personal hardship. Pharmaceutical advertisers who come under this category are restricted from using several features such as [in-market audiences](#), remarketing, demographic targeting, and similar audiences.

Healthcare-Related Advertiser Certification

- Pharmaceutical manufacturers, online pharmacies, and other companies that are seeking to utilize prescription drug terms in their [landing pages or ad text](#) would have to first be certified by Google.

- Pharmaceutical companies can apply for the certification by filling out Google's online form which can be accessed [here](#). Pharmaceuticals would need to ensure they adhere to the [country-specific regulations](#) along with additional requirements for the countries where their ad campaigns will be targeted.
- For the certification process, pharmaceutical companies would need their Google Ads customer ID, a copy of their pharmaceutical license with a '[Pharmaceutical Manufacturer Authorization Letter](#)' if applied by an agency, and a website URL.

Restricted Substances

- Google has developed a list of [prohibited pharmaceutical drugs](#) and supplements that are not allowed to be advertised regardless of any legal claim. Some unapproved substances include products that contain [human chorionic gonadotropin](#) (hCG) and ephedra, drugs that have received regulatory or government warning, and products with misleading claims.
- Pharmacies that advertise [unauthorized products](#) will be considered as egregious and may be suspended. Violation of this policy would include, but not limited to, targeting ads in [unlicensed locations](#), promoting unauthorized content, or providing prescription medicine without a prescription. Apart from account suspension, violation of Google Ad policies can lead to ad disapproval, compliance review, and disabling the company's [remarketing list](#).

Part Two - Google's Advertising Policies: Historical Changes

- In 2010, Google implemented a policy change to permit [certain kinds of pharmaceutical](#) adverts to get displayed among Google search results. Google's advertising policies began to reference/[recognize the dot pharmacy](#) (.pharmacy) TLD in 2016. In 2019, a new policy implemented by Google began to prohibit most [stem cell and gene therapies](#) ads, which are products of some pharmaceutical companies such as [Novartis](#), Roche, Catalent, and Thermo Fisher. Other insights on Google's advertising policy changes in the past, which affect pharmaceutical products and services are below.

Use of Ad Words in Pharmaceutical Ads: Policy Change in February 2010

- "[Towards the end](#)" of February 2010, Google implemented a policy change that began to allow certain kinds of pharmaceutical ads to get displayed on Google search results. However, only products or services from VIPPS and CIPA certified pharmacies would be allowed to benefit from such an advertisement. Google AdWords began to accept ads from online pharmacies within the United States that were accredited by the National Association Boards of Pharmacy VIPPS program, as well as from online pharmacies within Canada that were recognized or authorized by the Canadian International Pharmacy Association (CIPA.)
- This policy change allowed pharmacies to only target ads within their countries. Thus, pharmacies were allowed to target ads in any country in which they have accreditation. However, this policy change did not affect online pharmacy policies functioning in countries outside the [United States and Canada](#).

2015 Scanning Electron Microscopy (SEM) Policy for Paid Search Advertisements

- On July 20, 2015, "[Google's Black Box](#) Ad Format" was removed for changes that were in the pipeline that affected Google's URL infrastructure. Google's original Black Box Ad Format had the following restrictions.
- The Black Box Ad Format served as health risk disclaimers. It mandated some drug labeling as well as advertising to have the "[boxed](#)" or "[black box](#)" warnings, which indicated concerns for conditions that may develop or be associated with the drug that could lead to death or serious injuries.
- The black box formats now had to conform to the requirements of Google's standard text ad unit. The standard text ad unit was not required to display the entire [FDA-recommended disclaimer](#), which used to be the last line in the previously used Black Box Ad Format.
- The new disclaimer format required by Google utilized the drug name, the active ingredients in the drug, and details of the side effect of the drugs coming immediately after the top-level domain (TLD), as shown in the attached [format](#).

Google Advertising Policies Begin to Reference/Recognize .Pharmacy TLD in 2016

- In 2016, the National Association of Boards of Pharmacy (NABP) announced that "[Google now recognizes](#) the .pharmacy" top-level domain (TLD) as sufficient requirements for pharmacies as well as related entities to advertise online.
- In June 2016, Google's advertising policies relative to health care and medicines began to specifically "reference the .pharmacy TLD as [meeting its requirements](#)." This policy change meant that companies with the dot pharmacy (.pharmacy) top-level domain (TLD) would get automatically recognized as safe and legitimate.

- From June 2016, [Google's policies were updated](#) to recognize any website URL that ends with .pharmacy to be a safe and legitimate website and would be allowed to advertise online.

Google Ads Ban on Unproven Medical Products/Treatments in 2019

- In 2019, Google announced a new policy that prohibits most [stem cell and gene therapies](#). Gene therapies and stem cells are products of some pharmaceutical companies, "[including Novartis](#), Roche, Catalent, and Thermo Fisher."
- In line with its ethics and to maintain a trustworthy stance, Google decided in 2019 that it would no longer permit ads for "[unproven or experimental](#) medical techniques." Under this new healthcare as well as medicines policy, Google has prohibited advertising for treatments that lack scientific proof or have an insufficient biomedical and scientific basis. This policy bans most stem cell therapies and gene therapy and aims to cut down on ads for items like young blood transfusions as well as vampire facials.
- This policy change came as a response to the outcry over online marketing implemented by stem cell clinics that touted [unapproved treatments](#) for many ailments from joint pain to Alzheimer's disease. The outcry came as a result of opinions which felt that at best, many of these clinics were a waste of money and at worst, they were extremely dangerous.
- Other items banned by the policy include a list of unapproved substances such as those containing ephedra or [human chorionic gonadotropin](#) (hCG), which is used for weight control. Herbal and dietary supplements that contain active pharmaceutical and dangerous ingredients were also denied ad rights under this policy.

Part Three: Google's policies for YouTube Advertising

YouTube follows the same policies as Google for pharmaceutical product advertising. An overview of those policies is below.

Application

- Prior to [advertising on YouTube](#), pharmaceutical companies must apply for Google's "[healthcare products and services certification](#)."
- The [application is here](#) and is fairly short, as it usually has [10 or fewer questions](#).
- [To apply](#) for Google's healthcare products and services certification, applicants will need a Google Ads ID number, the copy of their pharmaceutical license (for agencies applying on behalf of manufacturers), and an optional website URL.
- [Other information](#) that will need to be provided during the application includes the following:
 - The [organization type](#) (online pharmacy, pharmaceutical manufacturer, governmental or well-established nonprofit health advocacy organization, addiction service provider)
 - The [country](#) where licensed
 - [Agency of manufacturer](#) affirmation
 - [Contact name](#)
 - [Contact email](#)

- [Address \(optional\)](#)
- [Phone number](#)
- [Website URL](#) (optional)
- [Website URL redirect](#) to online pharmacy indication
- [Google Ads customer number](#)
- If an agency is applying on behalf of a pharmaceutical manufacturer, a [Pharmaceutical Manufacturer Authorization Letter](#) and a copy of the pharmaceutical license will need to be submitted as well.

Policies

- Prescription drug ads [are currently only allowed](#) in the United States, Canada, and New Zealand.
- [Prescription drug terms are allowed](#) in ad text and on landing pages.
- [Over-the-counter medicines](#) can be advertised in Australia, Austria, Brazil, Canada, China, Czech Republic, France, Germany, Hong Kong, India, Italy, Japan, Mexico, Netherlands, New Zealand, Norway, Poland, Russia, Slovakia, South Korea, Spain, Sweden, the United Kingdom, and the United States.
- [Clinical trial ads](#) can only target people in Australia, Belgium, Canada, China, France, Germany, Indonesia, Ireland, Israel, Italy, Japan, Korea, Malaysia, Netherlands, New Zealand, Philippines, Singapore, Taiwan, Thailand, the United Kingdom, the United States, and Vietnam.
- [Birth control ads](#) are restricted in many countries, but are allowed in the United States, the United Kingdom, and Canada.

Restrictions

- YouTube [does not allow advertisements](#) for the following products:
 - All items on this list of [unapproved pharmaceuticals and supplements](#).
 - Products that contain [ephedra](#).

- Products that contain [human chorionic gonadotropin](#) (hCG) for weight loss or in conjunction with anabolic steroids.
- Herbal or dietary products that contain active pharmaceutical or [dangerous ingredients](#).
- Products that have [false or misleading health claims](#), including "claims implying that a product is as [effective as prescription drugs](#) or controlled substances."
- Products that have received a [governmental regulatory warning or ban](#).
- Products that have names that are [confusingly similar](#) to controlled substances or unapproved pharmaceuticals.
- [DHEA products](#) except in the United States.
- [Metatonin products](#) except in the United States and Canada.
- [HIV tests](#) except in the United States, France, the Netherlands, and the United Kingdom.
- [Speculative and experimental medical treatments](#). These include "[Stem cell therapy](#), cellular (non-stem) therapy, gene therapy and similar forms of regenerative medicine, platelet rich plasma, biohacking, do-it-yourself (DIY) genetic engineering products, and gene therapy kits."
- [Birth control products](#) in Bahrain, China, Djibouti, Egypt, Hong Kong, Iran, Iraq, Jordan, Kuwait, Malaysia, Lebanon, Libya, Morocco, Oman, Palestinian Territory, Qatar, Saudi Arabia, Syria, Thailand, Tunisia, Ukraine, United Arab Emirates, and Yemen.
- [Addiction services](#) in all countries except the United States and bidding on keywords is only allowed for alcohol and drug addiction.
- [Unauthorized pharmacies](#) are not allowed to advertise on YouTube and accounts may be suspended.

- Pharmacies that sell prescription drugs [without a prescription](#) or target locations for which they are not licensed are considered unauthorized pharmacies.
- [Online pharmacy promotion](#) is restricted on YouTube for both prescription and over-the-counter drugs to Australia, Austria, Brazil, Canada, China, Czech Republic, Denmark, Germany, Hong Kong, Japan, Mexico, Netherlands, New Zealand, Norway, Portugal, Slovakia, Sweden, Taiwan, the United Kingdom, and the United States.
- Online pharmacies can only [bid on keywords](#) that contain prescription drug terms in Australia, Austria, Canada, Czechia, Denmark, Germany, Japan, New Zealand, Netherlands, Norway, Portugal, Slovakia, the United Kingdom, and the United States.
- [Abortion-related ads](#) in the United States, the United Kingdom, and Ireland are required to be from [certified advertisers](#) that either provide abortions or do not provide abortions.

Part Four: Pharma Search Advertising - Market Size

The global market size for healthcare and pharmaceutical search advertising is approximately \$5.2 billion. Details and explanations of this estimate are below.

- In 2019, healthcare and pharma search spend in the U.S. will reach [\\$1.34 billion](#).
- The total digital spend for healthcare and pharmaceutical advertisers in the U.S. is expected to be [\\$3.62 billion](#) in 2019.
- The total spend for digital advertising in the U.S. in 2019 is expected to reach [\\$82.8 billion](#).

- Healthcare and pharmaceutical digital advertising represents 4% of the total digital advertising market in the U.S.
- Healthcare and pharmaceutical search advertising represents 37% of digital healthcare and pharmaceutical advertising.
- The total global spend for digital advertising in 2019 is expected to reach [\\$354.0 billion](#).
- Assuming healthcare and pharmaceutical digital advertising represents about the same percentage globally as it does in the U.S., this would mean the global healthcare and pharmaceutical advertising spend would be about \$14.16 billion.
- Assuming healthcare and pharmaceutical search spend represents about the same percentage of the healthcare and pharmaceutical digital advertising spend globally as it does in the U.S., this would mean the global healthcare and pharmaceutical search advertising spend would be about \$5.24 billion.

Search Strategy

To find the global market size for pharmaceutical search advertising, we first began by looking for formal research reports from companies like eMarketer, Dentsu Aegis Network, ZenithMedia, MagnaGlobal, and more. We quickly found the U.S. spend for healthcare and pharma search advertising, but since it didn't offer global numbers, it wasn't quite what we were looking for. In addition, it included healthcare search spend along with pharmaceutical search spend. Therefore, we continued our search for more precise data on a global level. All other research reports, though, restricted information to digital advertising spend or overall pharmaceutical advertising spend. They did not provide search spend on a global basis.

We knew we had the components available to triangulate an approximate global market size for healthcare and pharmaceutical search advertising, but we wanted to see if we could find more precise numbers in other sources. As such, we began by looking for media articles that might detail how much advertisers spend on search advertising for pharmaceuticals. We looked in sources like Forbes, The Financial

Times, Inc., AdWeek, CBSNews, NBCNews, and more. Unfortunately, we only found digital spend numbers for the United States and several other countries. We did find a breakdown of digital spend by channel, but it was U.S.-only data and didn't include search.

Our last attempt to find direct numbers was to look at various large pharmaceutical companies' annual reports to see if they reported how much was spent on search advertising. We searched the annual reports for Pfizer, GSK, Abbott, and Sanofi, but a pattern quickly emerged that showed they only provided advertising spend overall. We felt it would be futile to continue in this vein because even if we found search spend for one or two pharmaceutical companies, it would not represent the majority of the industry for a reliable proxy.

Therefore, we decided to triangulate an approximate global market size for pharmaceutical search advertising. In the absence of more exact data, we used the U.S. healthcare and pharmaceutical search advertising market size as our starting point. The following calculations were then made:

- Total digital spend in the U.S. (all industries): [\\$82.8 billion](#)
- Total healthcare and pharmaceutical digital spend in the U.S.: [\\$3.62 billion](#)
- Therefore, healthcare and pharmaceutical digital spend represents 4% of the overall digital advertising market in the U.S. ($\frac{\$3,620,000,000}{\$82,800,000,000} = 0.43$, rounded to 4%)
- Total healthcare and pharmaceutical search spend in the U.S.: [\\$1.34 billion](#).
- Therefore, healthcare and pharmaceutical search spend represented 37% of the healthcare and pharmaceutical digital spend in the U.S. ($\frac{\$1,340,000,000}{\$3,620,000,000} = 0.370$ or 37%)
- Total digital spend globally (all industries): [\\$354 billion](#).
- Assuming healthcare and pharmaceutical digital advertising represents about the same percentage of the overall digital spend globally as it does in the U.S., this would mean the global healthcare and pharmaceutical advertising

market is about \$14.16 billion ([\\$354,000,000,000](#) × 0.04 = \$14,160,000,000)

- Then, assuming healthcare and pharmaceutical search advertising represents about the same percentage of healthcare and pharmaceutical digital advertising globally as it does in the U.S., this would mean the global healthcare and pharmaceutical search advertising market is about \$5.24 billion ($\$14,600,000,000 \times 0.37 = \$5,239,200,000$)