

sanction is expulsion from an industry organization. Peer pressure from members of an association to abide by prescribed standards may be strong, but the effectiveness of expulsion as a deterrent will depend upon how much the individual advertiser values membership in the organization.

Although most witnesses supported the concept of advertising self-regulation, some noted that it was unlikely to be effective in dealing with all facets of advertising. The Grocery Products Manufacturers of Canada felt that self-regulation plays its most important role in controlling advertising where matters of "taste, public opinion and public decency are at issue."¹² The Retail Council of Canada expressed the view that voluntary guidelines are unlikely to deter deliberate misrepresentation or fraud.¹³

The Committee acknowledges that the effectiveness of self-regulation is contingent upon many factors, including the extent of membership in a self-regulatory body, the types of sanctions available, and the willingness of advertisers to adhere to a code of conduct and abide by the decisions made. It can also depend upon the level of public awareness of and access to the self-regulatory system. The Institute of Canadian Advertising suggested to the Committee that the biggest problem with self-regulation is that few people know about it.¹⁴ Indeed, the CAF attributes a drop in the number of complaints it has received in the past two years to a decrease in its advertising. Both the CAF and the CDMA informed the Committee that they intend to launch programs to increase public awareness of their activities.

The Committee believes that advertising self-regulatory bodies should do more to inform the public about their programs. In the Committee's view, the level of consumer awareness about misleading advertising must be increased and public use of and input into the self-regulatory system must be facilitated. Furthermore, consumers should know where and how to make complaints, and the methods employed for dealing with these. Complainants should be kept informed of the progress being made in dealing with their complaints. The Committee also believes that consumer organizations and members of the public should have representation on advertising self-regulatory bodies. This would allow for their input into policy development and complaint adjudication and provide opportunities for the expression of views from outside the industry.

In the Committee's view, self-regulation should never completely replace government regulation of advertising, some of which is necessary to ensure that consumers are provided with accurate information and to further