United Nations
Interregional Crime and Justice
Research Institute

Project SAVEmed
WP8, Deliverable D8.3
Submission date: M 16

# Report

Summary

This report presents the various steps that led to the creation and testing of a series of guidelines focused on using social media to raise consumers' awareness on Internet sales of counterfeit medicines. It describes the entire methodology used for this purpose, starting from the identification of different sources and modalities used for gathering information during the preliminary research phase. It presents the result of our research and the different steps that should be taken into consideration when developing and implementing an awareness raising campaign online. The report also describes the test phase and a practical application of the guidelines and the evaluation of its results with suggested possible improvements.

## *Identifying and targeting the potential consumers*

The role played by consumers of various counterfeit products usually fall within two broad categories: the victim of the crime or the "partner in crime". For a variety of goods – such as CDs, DVDs, luxury goods or clothes – consumers are often attracted by the lower prices of non-original products, by their availability and easiness of purchase as well as by the idea that, most probably, they will not be punished for purchasing counterfeit goods. In all theses cases, consumers are usually aware that they are buying a counterfeit product and play the role of "partner in crime".

For other product typologies - as in the case of medicines, food and beverages or spare parts - the situation may be different and consumers may become victims of the crime. We will focus our attention on the case of medicines, where consumers are usually lured by counterfeiters and spammers to visit fake and rogue e-pharmacies selling counterfeit products. In the case of medicines, consumers often buy counterfeit medicines without being aware of their real nature. More recent studies have also shown that, even in the case in which consumers buying medicines online do suspect that they are not purchasing an original product, they are totally unaware of the possible risks that counterfeit medicines can create for their health. Consumers tend to believe that they are in front of original products which did not receive a specific market authorization in their country or that they are ordering leftovers from big stocks that were previously purchased and are now sold at lower prices. They do not imagine how dangerous these products may be, demonstrating how incorrect information – or complete lacking thereof – plays a crucial role in fueling the market of counterfeit medicines.

While lack of information is one of several elements characterizing the problem, it is also important to understand the motives which are driving potential buyers to revert to the Internet for purchasing medicines.

The preamble to this exercise is the recognition that the Internet has radically changed the approach towards commerce, drastically modifying the attitudes of buyers towards the purchase of goods in general. Goods found over the Internet are usually sold at lower prices and medicines are no exception. However, and even if e-pharmacies often offer pharmaceutical products at cheaper prices than traditional ones, in the specific case of medicines lower prices are not the only driving motive behind online buyers' choices. The level of anonymity granted by the Internet is a very important driving motive that should not be underestimated and that contributes to push consumers towards online purchases (this is the case for example of people suffering from diseases considered as taboos, such as sexual or psychological illnesses, which prefer to avoid meeting a doctor to obtain a prescription and which find the possibility to order online as a very interesting

alternative). Practical convenience is another good driving motive, since pharmaceuticals purchased online are delivered directly at consumers' places.

The expansion of the Internet and of the associated e-commerce is demonstrated by the increasing number of Internet users, during last decades. In France, for instance, the presence of 19 millions of potential Internet buyers has been estimated, that is 54% of total web users. In the UK these potential buyers would be 28 millions, equal to 70% of total web users; in Germany this figure would total 33 millions, or 60% of web users. In Italy the number of potential "online buyers" is lower than in other European countries: 19% of web users (about 8 millions), even if it increased in 2009 compared to 2008[1] both in terms of purchasers (+ 2%) and of online orders (+ 13%).

For all these reasons, the need to focus awareness campaigns on this particular target group seems particularly urgent. Moreover, criminals that are behind the trafficking of counterfeit and illegal medicines are more and more aware of the extraordinary power of the new social media and social networks over the Internet. Counterfeiters and organized crime are already using social networks in order to advertise their products and to reach as many consumers as possible. On the other side, awareness actions conducted online through social media are not very widespread, especially in relation to the possibility of educating potential consumers on the risks associated with the use of counterfeit medicines and on the importance of avoiding purchasing products online from unverifiable sources. It is exactly for this reason that, with this report and with the awareness actions implemented within the SAVEmed project, we focused on identifying the possible strategies to spread knowledge on these issues through social media and networks.

*Risk Communication: why is it important?*

Several new international legal instruments being them new Conventions or new pieces of EU legislation, recognize the importance of risk communication.

---

[1] Senato della Repubblica Italiana, "*Contraffazione ed e-commerce farmaceutico*" vol. I atti dell'indagine conoscitiva svolta dalla 12° Commissione permanente del Senato, n. 22 ottobre 2010, XVI legislatura, p. 32

The Council of Europe "Medicrime Convention", adopted by the Committee of Ministers during the Conference of Moscow in October 2011, is a good example in this regard. The Convention is dedicated to the counterfeiting of medical products and similar crimes involving threats to the public health and, in its section on "Measures for prevention"[2], it requires States Parties to promote awareness-raising campaigns with the involvement of non-governmental organizations.

Furthermore, according to the new European Directive 2011/62, risk communication becomes an obligation for national Regulatory Agencies, and they are called to face the communication exercise on counterfeit medicines with the same science-based approach used for other activities.

The official recognition of the importance of risk communication confirms a key concept highlighted by several institutions involved in the fight against counterfeit medicines. Accurate information on the risks for consumers' health and safety created by these products can play a strategic role to guide their purchasing choices, especially when targeting schools and young people, since they are more familiar with the Internet. **Prevention through awareness raising becomes more and more important** also in consideration of the impossibility of making capillary controls on the Internet and of the difficulties deriving from the "darkening"[3] of dangerous and illegal websites.

However, communicating the risks of counterfeit medicines online is not a simple process. Information must be provided in a correct and accessible way, and must be adapted according to the specific target audience. At the same time, the serious dangers posed by counterfeit medicines and online sales of these products should be communicated without causing unjustified panic among consumers.

---

[2] *Medicrime Convention*, available online at
http://www.coe.int/t/DGHL/StandardSetting/MediCrime/Medicrime-version%20bilingue.pdf, charter V
Measures of Prevention, p.11
[3] This term refers to the act of concealing illegal websites.

## Consumers' awareness on Internet sales of counterfeit medicines

### 1. Research phase and data collection

The data collection phase took into account all these preliminary remarks and was aimed at gathering information on existing best practices, subsequently calling for inputs from the relevant authorities involved in the fight against counterfeit medicines online.

1.1 Examples of awareness campaigns online

In addition to an in depth analysis of existing researches and documents, the information presented in this part of the report was collected thanks to the collaboration established with several National Drug Regulatory Agencies that were interviewed during the SAVEmed project.

Some examples of awareness campaigns online will be presented following a "country by country" approach.

**Portugal**

The Portuguese National Authority of Medicines and Health Products – Infarmed – provided interesting information on its experience with awareness raising actions, with particular regard to an awareness campaign on the issue of "Medicines and the Internet"[4] that was developed and implemented in two phases (2008 and 2010). The main aim of the campaign was to alert consumers on the dangers linked to the purchase of online medicines outside the licit channels. At the same time, the organizers wanted to make the public aware of the new existing opportunities to buy medicines through legal orders via the Internet.

Infarmed developed a micro site for the campaign in 2008, with four different sections.

---

[4] Check the official website of INFARMED (only in Portuguese):
http://www.infarmed.pt/portal/page/portal/INFARMED/IMPRENSA/CAMPANHAS/INTERNET_2008

One section was dedicated to the possible risks of buying medicines online, while the second section contained useful hints on how to buy medicines safely over the Internet. The third section was a link to the Infarmed website, where a search engine was – and still is– available to verify whether the purchasing channel – both real and "virtual" – that consumers are going to use is authorized or not. More information was made available through further links within the Infarmed webpage, targeting in this way different audiences (public, health professionals, pharmacies and distributors, or industries). The last section of the micro site was interactive: consumers were asked to fill in a questionnaire on counterfeit medicines online, with the aim of checking their level of awareness on the possible dangers linked to online purchases of counterfeit medicines.

Four years ago Infarmed also developed a campaign based on "ad words", in cooperation with one of the most famous search engines. When users were searching for counterfeit medicines in Portuguese websites, pop-up messages informing on the possible dangers of

buying medicines online appeared as an "Alert". The campaign also circulated on Facebook and Youtube.

**Finland**

In 2012, the Finnish Customs - together with the Copyright Information & Anti-Piracy Center, The Finnish Anti-Counterfeiting Group, Pharma Industry Finland and the Embassy of the United States in Helsinki - developed an awareness campaign through Facebook called "FAKE NO MORE". They promoted a competition through this social network that was aimed at involving users to communicate information on counterfeit products, counterfeit medicines and internet piracy. The target of the campaign was formed mainly by children and young people. The competition was basically divided in two parts: 1) the first part was a quiz on piracy, counterfeit products and counterfeit medicines (questions changed twice during the campaign); 2) the second part was an invitation to create a slogan specifically tailored to the topic (to stimulate a broader participation, the users could also invite their Facebook-friends to like their slogan proposals). The campaign started on February, 16th and ended on May, 31st 2012.

In the context of the quiz, flashlights, watches, shoes and hoodies were raffled among the correctly answering people. The best voted logo/slogan won a prize as well. Finally, "Ad space" targeting especially secondary school and high school students, was purchased for the competition page in Facebook. In addition, the project relied on Facebook's intra-virtual marketing, in which visitors of the competition page share the page with their friends, to increase exposure. Schools were also informed of the competition and of the Facebook page directly.

The images below show the stand that was used in the opening ceremony of the "FAKE NO MORE" campaign, held in the shopping centre "Kamppi" in Helsinki last February 2012. The images were kindly provided by the Finnish National Board of Customs:

Source: Finnish National Board of Customs, 2012

**United Kingdom**

In the UK, since 2008, the Medicines and Healthcare products Regulatory Agency (MHRA) is partnering with the pharmaceutical company Pfizer and patient representative groups to deliver the "Get Real, Get a Prescription/Realdanger" campaign. The Pfizer led

initiative aims at educating the public on the risks of buying medicines from unregulated sources, including illicit websites.

The campaign was implemented in different phases and using different tools/media, starting with a cinema advert and PR (Public Relation) campaign to raise public's awareness on the unexpected ingredients that have been found in medicines bought online. The cinema advert was seen by over 9 million movie-goers and was reported in over 200 national and regional media articles. Over 100,000 people watched the advert on You Tube in 2008. The advert was seen by an even wider audience in 2009, when it was screened on late night UK television channels and was accompanied by a hard hitting billboard and an online campaign. Over half of adults in the UK saw the TV advert. Visits to the related pages on MHRA's website increased by 700% and surveys conducted on those who saw the campaign showed that 75% of respondents would think twice before buying medicines from unregulated sources.

The most recent phase of the campaign, held in 2011, utilized social media and social networks to communicate with consumers on the importance of buying online medicines only from legitimate sources. It alerted users on the role of spam emails and social networks as advertising mechanisms used by counterfeiters. The campaign also presented the findings of an investigative report that highlighted the dangerous ingredients found in the goods offered by spam emails.
.

Throughout every stage of the campaign, consumers were directed to a specific website (www.realdanger.com). The website provided consumers with information on several aspects of the problem, such as spam e-mails, potential serious health risks associated with counterfeit medicines, advice on buying medicines safely, the history of the campaign and included space for user interaction.

**Source**: RealDanger website, available online at: http://www.realdanger.co.uk/

**Spain**

In 2008, the Spanish Agency for Medicines and Medical Devices launched an awareness campaign on its own website. The campaign was also released through pharmacies, thanks to the support of the General Council of the Official Association of Pharmacists.

The interactive website of the campaign –
http://www.aemps.gob.es/informa/campannas/medicamentosinternet/ventaMed_Internet09/index.htm  –informed consumers mainly on the illegal aspects of counterfeit medicines and the possible risks created to consumers' health, also providing suggestions on how to safely buy medicines.

Fecha de publicación: 6 de febrero de 2009

**Source:** Spanish Agency of Medicines and Health Products, available online at: http://www.aemps.gob.es/informa/campannas/medicamentosinternet/ventaMed_Internet09/index.htm

**Denmark**

The Danish authorities created "The Permanent Danish Network Against Counterfeiting and Piracy", which brings together the national authorities involved in the fight against counterfeiting and piracy, including the Danish Medicines Agency.

Within the framework of this network, the Danish Medicines Agency launched an awareness campaign against dangerous weight loss pills being sold illegally via the Internet. The campaign was entitled "NIX-PILLE". Several slogans were created, as: "Take care of yourself - buy approved weight loss pills" and "The Internet is overflowing with harmful weight loss pills".

A dedicated website of the campaign was created, only in Danish, containing:
- Facts about weight loss pills

- Footage from the manufacturing of counterfeit and dangerous weight loss pills

- Information on what the consumer should be aware of.

The message to be passed was that "many of the dangerous weight loss pills are counterfeits of genuine products. Weight loss pills, which are not approved by the authorities, can contain anything from lime and cement or too high doses of the active medical substance, to substances which are not declared on the package"[5].

The banner of the campaign, in Danish, is presented hereunder:



**Source**: Nix-Pille campaign, available online at: http://ext.laegemiddelstyrelsen.dk/nix-pille/forside.htm

---

[5] Website of the Permanent Danish Network Against Counterfeiting and Piracy available online at: http://int.stoppiraterne.dk/consumer/the-danish-medicines-agency%E2%80%99s---%E2%80%9Cnix-pille%E2%80%9D-campaign.aspx

**Belgium**

In 2009, the Belgian Drug Regulatory Authority launched a campaign on the risks related to Internet purchases of medicines, using a dedicated website - http://www.medicaments-par-internet.be/fr/.

The website contained informative articles, interactive games, and informative materials for download - such as a leaflet for patients explaining the risks of purchasing medical products from illegal sources[6].

Hereunder we may see the banner of the Belgian campaign in French:



**Source:** Website of the campaign "Médicaments par internet? Ne surfez pas avec votre santé!" available online at: http://www.medicaments-par-internet.be/fr/

---

[6] The information on the campaign were taken from AIFA (2011), Counterfeit Medical Products and Similar Crimes. Risk Communication, CD-ROM

**Italy**

IMPACT Italia is the Italian national task force against the counterfeiting of medicines established by AIFA (the Italian Medicines Agency), which involves also the Italian Ministry of Health, the Carabinieri NAS (the Italian health police) and the National Institute for Health (ISS). In 2009, IMPACT Italia launched an awareness campaign dedicated to alert consumers on the risks of purchasing medicines from illegal and unregulated channels. The slogan of the campaign - "ATTENTO!" - was an Italian adaptation of the "BE AWARE" model developed by the World Health Professionals Association and approved by WHO IMPACT in 2007.

IMPACT Italia developed several materials for the campaign, as a poster and a leaflet for the patients which were distributed in pharmacies and "healthcare aisles" authorized to sell medicines without the obligation of a medical prescription to the public. A website (www.impactitalia.gov.it) for gathering signals of suspect counterfeiting activities from the "field" was also developed.

 To evaluate the results of the campaign, AIFA carried out an evaluation of the perception of the campaign among the consumers. Even though the results of the evaluation were not presented by the Agency, it is worth highlighting that monitoring the perception among the users is crucial to assess strengthens and weaknesses of the campaign itself. The evaluation activity has to be considered as a good practice also by other bodies and institutions when planning an awareness campaign. This is one of the best ways to better tailor the message and the communication tools on the selected target according to the feedbacks obtained, as well as to improve the effectiveness for future actions.

1.2 On-line research

Due to the nature of the problem, part of the research carried out to develop the guidelines on consumers' awareness was carried out using online sources.

The official websites of various National Drug Regulatory Agencies proved to be important sources of information and case studies. Most of them have specific pages dedicated to communication actions (if only some of them are available in English). Other important online sources were found in the websites of the Council of Europe, the European Directorate for the Quality of Medicines and HealthCare (EDQM), the World Health Organization, the European Medicines Agency, Interpol and Europol.

Part of the information, especially the case studies on seized counterfeit medicines had been collected by UNICRI and systematized within its dedicated database. Some of these cases were provided by Bascap, the Business Action to Stop Counterfeiting and Piracy.

1.3 AIFA - EDQM research on Risk Communication

In October 2011, AIFA and the European Directorate for the Quality of Medicines and Healthcare co-published a dedicated study focus on risk communication in the field of counterfeit medical products and similar crimes. The publication was prepared by several experts within the framework of the ongoing activities carried out by the Committee of Experts on minimizing public health risks posed by the counterfeiting of medical products and similar crimes, supported by AIFA[7]. The goal of the research was to give scientific support to the communication exercises dedicated to providing information on the risks posed by counterfeit medicines. These communication exercises are now becoming a standard practice for all interested stakeholders, as demonstrated by numerous examples of practical experiences reported in the AIFA-EDQM study. These practical examples provided crucial hints for our research and supported the elaboration and development of a set of guidelines focused on identifying strategies for awareness campaigns conducted online.

1.4 Search-engines

During the implementation of the SAVEmed project, UNICRI started a dialogue with stakeholders involved in the planning and dissemination of awareness campaigns, obtaining additional information on several interesting elements to be taken into account.

One of these elements is related to the possibility of using alert systems, both in search engines and in social media, to make consumers aware of the possible dangers linked to buying medicines online from unverifiable or unregulated sources.

---

[7] AIFA (Agenzia Italiana del Farmaco) - EDQM (European Directorate for the Quality of Medicines and Healthcare), "*Counterfeit Medical Products and Similar Crimes. Risk Communication*", 2011, p.5

The talks held allowed for the possibility to highlight the importance of acting through - and in cooperation with - search engines, linking alert messages (in pop-up form) to specific searches operated by users over the Internet. This action may have the effect of alerting potential consumers on the risks faced when buying medicines from unverifiable or unregulated websites and should convince them to avoid online purchases of these products if they are not 100% sure of the trustworthiness of the website. However, the use of such of pop-up messages would not be feasible for every single medicine, due to the extremely large number of products' names, but it could be applied for specific keywords, such as "medicine" or "online pharmacy".

Some Regulatory Agencies already implemented similar mechanisms at the national level such as, as previously mentioned, the Medicines Authority in Portugal. The importance of similar actions, underlined also by the stakeholders with whom UNICRI entered into contact, should be taken into account in view of further developing awareness raising methods online.

1.5. Results of the SAVEmed roundtables, meetings and inputs from countries

A series of roundtables and meetings was organized during the SAVEmed project to gather inputs from relevant stakeholders on several aspects directly connected with the implementation of the activities. The roundtables saw the participation of stakeholders from different European countries - such as Romania, Italy, UK, Ireland, the Netherlands, Finland and Czech Republic - involved in the fight against counterfeiting. These meetings proved to be a useful method to gather information on several aspects, including the issue of raising consumers' awareness online. The representatives of the countries discussed different issues regarding the strategies that should be adopted for the planning and implementation of online awareness actions focused on counterfeit medicines, especially considering their possible application to social media. In this regard, representatives of national authorities (i.e. national pharmaceutical agencies) and associations of manufacturers started a discussion on how to possibly plan an awareness campaign over the Internet by means of the same elements used by counterfeiters to

promote and sell fake medicines. Social networks were one of the possibilities that were discussed more in depth.

Indeed one of the issues that emerged during the roundtables and the preliminary discussions, concerns the importance of "involving consumers" in the fight against counterfeit medicines. Providing accurate information to consumers and potential consumers of counterfeit medicines is extremely important, as it is important to "involve" consumers more and create a sort of "thirst for knowledge" to push them to gather more information in view of supporting their purchase choices.

Information actions need to be planned and addressed carefully, also with reference to the content of the message. In this regards, what emerged from the research work and the various discussions held, is that the focus of the information should be risk communication, conducted in a way to avoid scaring people off from taking their medications. Focusing on risk communication also means keeping a certain distance from messages containing just a negative approach, such as "do not buy medicines online!". The focus becomes the passing of knowledge to consumers, presenting them that buying medicines online from unregulated or unverifiable sources can be extremely dangerous for their health. Consumers need to have all the instruments in their hands to perform "informed choices" and providing these instruments should be the goal of the campaign.

Other important topics to be addressed to increase awareness are safety issues, economic and tax issues linked with counterfeiting activities, and the links with organized crime and money laundering. With reference to the latter elements, showing the criminal scheme that is behind the production and trade of counterfeit medicines and very often also behind online sales of counterfeit medicines, could have a direct influence on consumers' purchasing choices. This factor has been demonstrated by a series of researches on consumers' perceptions which showed how consumers would be less willing to buy counterfeits when they know that their money is directly financing organized crime or terrorists' activities[8].

---

[8] UNICRI, *Strategies for Technical-Juridical Training and Awareness Raising on counterfeiting*, 2010

These elements, however, could also be communicated during a later stage, after that the attention of the target has been attracted. This is another interesting factor because it opens up for the possibility to have a multi-stage information action. The first stage should be focused on attracting consumers' interest, creating that "thirst for knowledge" that was previously mentioned. To this end, a simple but effective message or set of messages should be chosen, avoiding boring consumers with long explanations that may quickly create a loss of interest in the reader. However, the message or set of messages should contain/present the possibility to deepen the knowledge of the problem at a later stage and following the interest of consumers. For instance, a web-link presented in the initial campaign's message and redirecting to a complete page of information on the phenomenon, could well serve the purpose and capture the readers' attention into the second stage of the information package.

Regarding verification mechanisms possibly given to consumers to check the authenticity of their purchases, the discussion highlighted a very important element: consumers' involvement in this case is a good possibility but should not go so far as to put a burden of verification of the originality of pharmaceutical products on them. This is an extremely important issue because it clearly defines that consumers need to be informed and given the possibility to verify what they are buying but without creating a responsibility upon them, since this responsibility should remain within the competencies of Drug Regulatory Authorities, other National Authorities and/or pharmacies.

Another interesting element that emerged during meetings with National Authorities is the increasing presence of counterfeit food supplements in both licit and illicit markets of several countries. This is a new trend that possibly represents a shift in the strategies of organized crime. Having seen an increased attention from National and EU Authorities on the issue of counterfeit medicines, coupled with new and more stringent regulations issued at the EU level, counterfeiters are finding in food supplements a new market with a lot of profit potential. It is not regulated and, consequently, introducing counterfeits in the market or selling them online is certainly an easier task for criminals. Consumers'

attention needs to be called on this expanding market. Counterfeit food supplements may cause severe health consequences for consumers and these risks need to be communicated, especially considering that counterfeiters often mask a product with the same composition of a fake medicine behind the appearance of a food supplement.

**2. Setting up the awareness campaign online**

Following the different meetings and discussions with the actors involved both in the project or in the fight against counterfeit medicines online in general, UNICRI developed a pilot awareness campaign online on this topic to practically testing the preliminary draft of the guidelines and refine them on the basis of the pilot's outcomes.

The campaign was launched online on July, 31$^{st}$ and constantly updated by UNICRI until the end of November 2012. After this period a final evaluation of the results of the campaign was carried out.

The campaign was articulated into several interrelate actions. Two of the main social networks – Facebook and Twitter – and the specific Facebook application for campaigns ("Causes") were selected as means of communication. The articles, news and texts to be published on the social networks were drafted; videos and pictures to be shared with the public were also selected. After that, before officially launching the campaign, UNICRI identified a sample target of users for a "pilot action". The pilot action was meant to be a sort of "test", in order to check with the selected target what was working and what was not working with the online campaign, both in terms of contents and the use of the social media. The sample selected for the "pilot test" was composed of people under the age of 35, who use Facebook and Twitter with a certain regularity, familiar and not familiar with the issue of counterfeit medicines. An email with the instructions regarding the campaign was prepared and disseminated among the selected sample. The target users were asked to send their feedbacks both on the contents of the campaign and on the way it was presented by replying to the email or by uploading comments directly on facebook/twitter. Some comments have been collected from the users after the pilot

launch of the campaign and the changes were made accordingly before the official launch. Collecting their feedbacks was a very important step in order to try to render the pilot campaign as much effective as possible.

Throughout the implementation of the campaign, several continuous references to the SAVEmed website were presented. These references were chosen as starting and final points of each informative activity. As it was mentioned several times during the roundtables and the meetings with the relevant stakeholders, having a web page with its own domain is significantly effective as a main source of information for all online consumers targeted.

While developing the campaign, it was discussed and agreed with the stakeholders involved in the project's meetings that a logo would have made the campaign more recognizable. Indeed, the SAVEmed logo was already known as a symbol of the project and of the related actions, thus it was chosen as the pilot campaign logo a simple and adequate one for the pilot campaign.

One of the first steps of the campaign was the publication of a Wikipedia page, specifically dedicated to the topic of "Counterfeit Medicines Online". The article summarized the main features of the phenomenon, explaining the techniques used to distribute and sell fake drugs and their dangerousness. In addition, a direct link to the SAVEmed and UNICRI web pages was added, as well as a reference to the Twitter and Facebook accounts of the campaign.

As a further step, UNICRI created a new Twitter account solely for this awareness campaign. The account was specific on the topic, involving and collecting the inputs of several people interested in this initiative focused on counterfeit medicines sold online. The campaign logo became the avatar of the account, and a concise bio and link to the UNICRI and SAVEmed websites were inserted. The colors and background were also changed and selected in a way to look more attractive.

UNICRI followed all the main organizations working on counterfeit medicines which are present on Twitter, as well as the ones who seemed to be interested in the cause. During the pilot campaign it was also decided to follow everyone back, an element that, on twitter, acts as a motivation for people to follow you. With the aim of increasing exposure of the campaign, various methods to ensure a wide spreading of the communication were used, as is the case of the «#symbol», called an *hashtag*. This is an important element for Twitter users, because the symbol is used to mark keywords or topics in a Tweet. *Hashtags* can be used to categorize or follow topics (in this specific case: counterfeit medicines and their selling online). By including a relevant *hashtag* in a tweet, it will become visible to people searching for that specific topic, adding the awareness campaign to the general discussion. Conversely, *hashtags* automatically narrow down the audience, allowing the tweets of the campaign to reach and engage only those interested in the same subject matter.

A specific Facebook page for the campaign was also created, using the SAVEmed logo as profile picture. From the Facebook account, UNICRI created a new "cause" using the recent application 'Causes'. Founded in 2007, this online advocacy application of Facebook, became one of the largest online platforms for activism, enabling users to create groups that take action on a social issue or support a specific non-profit organization.

UNICRI filled out all of the information and added the logo. After that, Facebook users were invited to join the campaign (adding a personal message to ensure their participation). The Cause also allows publishing regularly on the Facebook campaign's page, creating enough buzz to get a number of members to start off with.

After creating a twitter account and a Facebook cause, UNICRI placed corresponding icons to the campaign profiles on each social media. In this way, when someone was visiting the website, they immediately knew that they could follow the campaign on Twitter and/or the Cause via Facebook.

UNICRI planned to tweet 15-20 times a week, to take advantage of the direct connection established with the people. Both UNICRI and SAVEmed website were shared on the Facebook and Twitter profiles of the campaign every 5-6 days.

At the end of the four months campaign, a summary of the results obtained and an evaluation of the tangible results was carried out (see Annex). This was a very important step in view of providing concrete guidance for those who plan to implement similar actions in the future and that will be able to benefit from our experience.

Further developments to be possibly implemented in the future in a new campaign – in the case of its creation – could include organizing social media events inside the awareness campaign. Throughout Twitter, for instance, *hashtag* competitions could be organized, even by simply creating a *hashtag* (es. #SAVEmed) and promote its use in all the messages concerning this subject. The ultimate goal would be to get enough mentions to be listed on the Twitter search page as a "trending topic". That would lead to greater visibility to twitter users who would learn about the campaign, be interested in visit the site, or participate in the contest and increase the buzz around the campaign. Throughout Facebook, on the other hand, a future development could consist in promoting a dedicated day to anti-counterfeiting of medicines and encourage as many users as possible to adopt the awareness campaign's logo as profile picture for that day. Further actions might be implemented during the management of a new online campaign, following the feedbacks collected from the users during the pilot campaign. This should provide a tangible outcome and involvement of those users actively participating in the campaign.

**Conclusions**

The activities concerning online consumers' awareness on counterfeit medicines included both a research part and the practical implementation of its theoretical results through the creation and launch of a pilot awareness campaign over the Internet.

The information collected from various sources, the meetings and discussions with various stakeholders and the practical implementation of the online campaign, allowed the developing of a set of Guidelines on this subject.

The analysis of the best practices identified in some European countries and the inputs received by the actors involved in various meetings have been important starting points in order to set up the Guidelines.

The aim is to provide a reference point for those actors who wish to implement similar awareness actions in the future, allowing them to build on our experience. They will be able to design their strategy and implementation plan considering experiences and actions already tested and evaluated, such as the SAVEmed campaign on social networks.

# *ANNEX 1*

## SAVEmed AWARENESS CAMPAIGN ON SOCIAL NETWORKS

Project SAVEmed provides for the implementation of a specific set of activities dedicated to the strategies for planning and implementing awareness actions online focused on the selling of counterfeit medicines over the internet. Particular attention was given to counterfeit drugs distributed and sold online through social media.

Social media provide tremendous opportunities for inexpensive word-of-mouth marketing, allowing for the possibility to reach out to more people than ever before.[9] In this regard, a pilot campaign over the same internet channels used by counterfeiters to promote and sell their illegal products – i.e. websites and social networks - was started.

The pilot awareness campaign created and implemented by UNICRI was articulated in several actions from July to November 2012.

1. **Design and development**
   A logo and a slogan (SAVEmed: save consumers from FAKE medicines) were identified to make the campaign more recognizable. The SAVEmed logo was used for this scope and proper recognition of the EC funding was ensured.

2. **Facebook and Causes accounts**
   A specific Facebook page for the awareness campaign was created, using the agreed logo as profile picture (http://www.facebook.com/pages/SAVEmed/179445768854792). An image with the slogan (SAVEmed: save consumers from FAKE medicines) was created by our graphic artist and used as cover. A concise bio and link to the UNICRI and SAVEmed websites were added to the page, describing the SAVEmed project and explaining the purpose of the awareness campaign online. A direct reference to the EC funding support was included in the bio.

   From the Facebook account, UNICRI created a new "cause" using the recent application 'Causes' (http://www.causes.com/causes/788446-savemed-save-consumers-from-fake-medicines?_utm_campaign=home). Founded in 2007, this online advocacy application within Facebook became the world's largest online platform for activism, enabling users to create grassroots groups that take action on a social issue or support a specific non-profit organization. The system allows publishing articulated posts with the use of videos, photos, quizzes, stories, polls.

---

[9] http://www.wordviewediting.com/tag/non-profit-social-media/

These actions allowed presenting information and news on the campaign in two ways: creating a post on 'Causes' and  allowing the system to publish on the Facebook page; or publishing directly messages, photos or videos on Facebook.

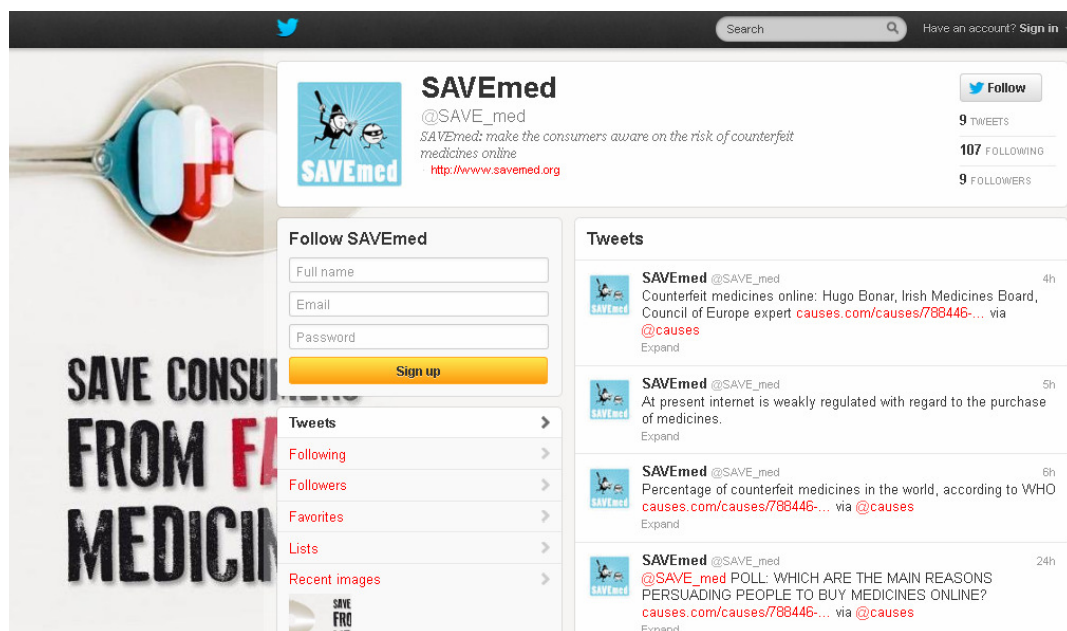## Facebook

# CAUSES



3.     **Twitter account**

UNICRI created a new Twitter account solely for the implementation of the awareness campaign. The account was specific on the topic of counterfeit medicines sold online, involving and gathering the support of several people on this initiative. The agreed logo was used as the avatar, while for the background the choice fell on the same slogan and image created by our graphic artist that were used as cover for the Facebook page. UNICRI followed all the main organizations working on

counterfeit medicines which are present on Twitter, as well as the ones that seemed to be interested in the cause. To create interest around the campaign, UNICRI was also careful in following back everyone who decided to follow us, which on twitter acts as a motivation for people to continue following in return.

Similarly, particular importance was given to the use the «#symbol», called a hashtag, on Twitter, which allows marking keywords or topics in a Tweet.  Hashtags can be used to categorize or follow topics (in this specific case: counterfeit medicines and their online selling). By including a relevant hashtag in a tweet, the theme became visible to people searching for that specific topic, adding our awareness campaign to the general discussion. Conversely, hashtags can also be used to automatically narrow down the audience, allowing our tweets to reach and engage only those interested in the same subject matter.

UNICRI managed to connect the campaign's Twitter page with the campaign's Facebook page. In this way each information or news published on Twitter was automatically republished on Facebook, and the other way round. This system allowed for the possibility to use three ways to publish on Twitter: add an action on 'Causes' and then allow the system to publish it on Twitter, which would automatically republish on Facebook; publish a post on Facebook, which again would be directly republished on Twitter; write directly a tweet on Twitter, which would finally be republished also on Facebook.

## TWITTER

4.    **Create a Wikipedia article**

UNICRI created also a Wikipedia page dedicated to counterfeit medicines sold online. The article summarizes the main features of the phenomenon, explaining the techniques used to distribute and sell fake drugs over the Internet and their dangerousness. In addition, the page contained cross-references to other Wikipedia articles on similar subjects. A direct link to the SAVEmed and UNICRI web pages was added, as well as a reference to the Twitter and Facebook accounts.



5.    **Tweet, post and spread the word**

UNICRI posted on Facebook and Twitter 10-15 times a week, taking advantage of the direct connection established with the people/followers. The UNICRI and SAVEmed websites as well as the link to the Wikipedia page were regularly shared on the Facebook and Twitter profiles of the campaign every 10-15 days.

**Conclusions**

The awareness campaign was developed as a pilot. After having created all the online campaign instruments through Facebook, Causes, Twitter and Wikipedia, UNICRI launched a preliminary campaign on 25th July 2012. In the beginning the organizers prepared a mailing list of 80 contacts inviting them to check the campaign on the social media and give a feedback in 4 days. On the basis of the feedbacks received, UNICRI changed some aspect of the initial pages and was ready to launch the pilot campaign at the end of July 2012.

The campaign lasted 4 months, sharing and presenting information and news on the danger of counterfeit medicines sold online. Posts, advices, photos, videos, graphics, quizzes and polls were used for this purpose. Thanks to the Facebook and Twitter statistics available on users' daily interest, we have been able to study the efficiency of the messages and of the different instruments of communications and interrelation.

The highest pick of users' interest on the awareness campaign was registered during the launch period in August. This is mainly attributable to the fact that in this phase UNICRI directly involved people throughout a series of mails inviting them to join and share the campaign. A second pick was reached in mid October, when two "buttons" for 'inviting friends to join your cause' were added to the Facebook page.

Even if the registered number of followers on Facebook and Twitter was quite limited if compared to the ones of big campaigns, this number was nonetheless relevant for a pilot campaign that lasted only four months. We received positive and interesting feedbacks from several users that were regularly following our online campaign.

# Guidelines

## Consumers' awareness on Internet sales
## of counterfeit medicines

### Planning of the campaign

- **Clarify what you want to achieve and how to reach it**

In the specific case of counterfeit medicines online, it is fundamental to inform potential online purchasers of counterfeit medicines about the risks of buying medicines online from unauthorized, illegal or unverified sources. The use of social media could prove extremely effective considering both their diffusion among online users and the fact that they are also exploited by counterfeiters to promote their products.

- **Identify pragmatic and assessable objectives**

Identifying measurable objectives permits to evaluate the possible results of the campaign. The objective can change according to the advertisement channels and the social media used. For instance, within a "Twitter campaign" the objectives might be: how many tweets/followers/mentions do we think to achieve in one month? Within a Facebook campaign: how many likes/friends/comments do we expect to collect in one month?

- **Identify priorities**

Considering the aim of the campaign, the main priorities would be:
- to easily communicate the risks of counterfeit medicines online;
- to inform consumers about the possible dangers of buying medicines from unauthorized, illegal or unverified sources, without create panic on the use of medicines;
- to catch consumers' and online users' interest, creating a thirst for knowledge pushing them to seek further information on the subject;
- to reach as many consumers as possible.

- **Information gathering**

There are different ways to collect useful information in support of the campaign:
- establish contacts with national authorities involved in the fight against counterfeit medicines to coordinate actions and to evaluate the existence of previous experiences;
- conduct online research to gather information;

- analyze best practices and similar campaigns already implemented and evaluated in other countries.

- **Choice of strategies and tactics**

    This element varies according to the analysis of the selected audience and its state of knowledge on the topic.

In the framework of an online campaign conducted using social media, some basic strategies should be taken into account:

- Keep the campaign alive by acting on the media and posting messages frequently;
- Be clear. Messages and actions should be as much clear and understandable as possible, in order to catch the attention of the readers and avoid creating confusion;
- Target the actions to the audience, remembering that the audience quite often has no knowledge of the topic. Thus, it is impossible to focus the attention on facts and elements which can clearly catch the attention avoiding complicated and long explanations;
- Be creative, vary the actions, use links to articles, videos, and reports to create a contact with real facts;
- Allow those who want to delve into the topic the possibility to do it by providing links to sources containing in-depth information.

Apart from social networks, search engines could also represent an important vehicle to channel information and warn consumers. Some basic suggestions gathered from good practices and meetings include the possibility to explore the use of pop-up messages linked with specific search keywords. This is an element that has already been used and thus its application is feasible. However, further considerations arise and call for the attention from campaigns' organizers. In particular:

    o It has to be noted that it is extremely difficult to link alert messages with all products at risk,
    o The use of this method may require identifying keywords to which the pop-up messages will be linked.

**Strategic approach to the target**
Even if some of these elements have been included in previous points, it is important to highlight their importance for the effectiveness of the online campaign:

- Choice of information channels: considering that the criminals behind the trafficking of counterfeit medicines are more and more aware of the extraordinary power of the social media, and that they use social networks to advertise their products and reach potential consumers, the choice of the information channels to

spread the campaign should keep this situation into consideration and start using social media to enhance its effectiveness.

- Carefully tailor the awareness campaigns to the target;
- Do not use messages that can scare consumers or undermine their confidence in the medicines' market in general;
- Focus on risk communication rather than on negative and generic messages (such as "Do not buy medicines online!")
- Do not ease the burden of verification on consumers. This is an extremely important issue since a balance needs to be created between; 1) the will or the attempt to provide consumers with instruments/methods through which they can check the authenticity of the products they buy online; 2) the responsibility of the checks and controls to be performed with regards to the products that are sold. The rationale behind this balance has been explained in the report presenting how these guidelines have been achieved;
- Catch the attention of potential consumers without using long messages to avoid boring them;
- Allow consumers getting more in-depth information by providing them with further links if they feel the need;

- **Determining the message**

The overall message needs to be short and clear: "Buying medicines online can pose risks to the health and safety of consumers – you need to be careful!" is a good example.
The general message has to be clear during all the different phases of the campaign.

- **Focusing on the contents of the campaign**

- Inform consumers on the risks of buying medicines from unauthorized/illicit sources. This is the primary element of the information campaign.
  Additional elements that need to be communicated, both to catch consumers' attention and to present more complete information on the phenomenon, include:
    - Provide information on the involvement of organized crime and the role of money laundering (this element in particular can directly influence the purchase choices of potential consumers);
    - Provide information on safety issues, related to the risks for health and security of citizens and tax-related issues;
    - Provide information on the possible effects at the social and economic level.
    - Inform consumers on the risks of buying food supplements from unverifiable sources, since counterfeit food supplements are a new and emerging market for criminals.

These elements could also be made accessible only through links allowing interested consumers to obtain more in-depth information, pointing the attention

of the short messages of the campaign only on its main object (inform consumers on the risks of buying medicines from unauthorized/illicit sources)

- **Monitoring and evaluation of the tangible results of the campaign**

At the end of the campaign, a summary of the results obtained and the evaluation of the tangible results should be carried out. This is very important also in view of improving further campaigns that might be developed on counterfeit medicines online.

## Practical advices: how to set up an awareness campaign online

Social media provide tremendous opportunities for inexpensive ways of communication that allow campaign-promoters to reach out to more people than ever before. In this regard, an awareness campaign launched through social media can be easily developed following few simple actions.

- **Domain and web page**

Having a web page with its own domain is significantly effective since it can become the main source of information for all online consumers targeted by the campaign.

- **Designing and developing**

Create a campaign logo. A logo would make the campaign more recognizable. If there is enough time to dedicate to the issue, a blog could be developed but it needs to be updated regularly. Otherwise, even a static website or single web page may serve the purpose. Always remember to present the information in a way that is straight and to the point.

- **Creating a Wikipedia article**

The following step should be the creation of a Wikipedia article on the specific topic of the campaign, unless a similar article already exists. In this case, a good choice should be to contribute to the existing article, according to the specific information that the campaign organizers have gathered and that they intend to share with the targeted users. The link to the Wikipedia article should then be inserted within the campaign main website or social networks' accounts.

- **Creating a Twitter account**

A Twitter account solely dedicated to the campaign could prove to be a very effective method to pass information, adding exposure to the campaign while catalyzing the interest of Internet users. The account should be managed in a way to encourage people to follow the account so that they can take part in the initiative. The campaign

logo should be used as account avatar with the aim of linking this action to other actions of the campaign. A concise bio and a link to the campaign website should also be provided. Colors and background on the account should also be personalized, making the account looking more attractive.

Users should be always properly followed, both those that are already known to the campaign organizers and the ones who might be interested in the cause. Every user should be followed back, as a sort of "thank you for choosing to follow me". Furthermore, remember that another important element of twitter is the «#symbol», called *hashtag* and used to mark keyword or topic in a Tweet. Hashtags can be used to categorize or follow topics (in this specific case: counterfeit medicines online). By including a relevant hashtag in a tweet, it would be visible to people searching for that specific topic, adding the awareness campaign to the general discussion. Conversely, hashtags would automatically narrow down the audience, allowing tweets to reach and engage only those interested in the same subject matter.

- **Creating a Facebook account and Cause**

A Facebook page for the specific awareness campaign should also be created, using the campaign logo as profile picture. From the Facebook account, campaign organizers could also decide to create a new "cause" using the recent application 'Causes'. This online advocacy and fundraising application within Facebook is one of the world's largest online platforms for activism, enabling users to create groups that take action on a social issue. After that, organizers should invite those Facebook users most likely to join the campaign (adding a personal message to ensure their participation). The Cause could be also used to encourage publishing regularly on the campaign's Facebook page, creating in this way enough buzz to get a number of members to start off with.

- **Links to Social Network profiles**

After having created a twitter account, a Facebook cause or any other initiative in a social media, the corresponding icons of the campaign profiles should be placed on the campaign website and/or on the campaign blog. In this way, people visiting the website would immediately know that they have the possibility to follow the campaign on Twitter and/or the cause via Facebook, or follow a link to another initiative in a social media.

- **Tweet, post and spread the word**

Remember to keep the initiatives alive. For instance, organizers could tweet 15-20 times a week, to take advantage of the direct connection established with the followers. Furthermore, the campaign's website should be shared on the Facebook and Twitter profiles every 5-6 days.

In a second moment, it would be even possible to organize social media events inside the awareness campaign. Throughout Twitter, hashtag competitions can be organized, by simply creating a hashtag (es. #SAVEmed) and promote its use in all the messages concerning the subject. The ultimate goal is to get enough mentions to be listed on the Twitter search page as a "trending topic". This would lead to greater visibility to twitter users who would learn about the campaign, perhaps visit the website, or at least participate in the contest created with the hashtag competition, increasing the buzz around the campaign. Throughout Facebook, on the other hand, it would be possible to promote a dedicated day to anti-counterfeiting of medicines and encourage as many users as possible to adopt the awareness campaign's logo as their profile picture for that day.

## Conclusion

These are some possible actions that can be undertaken in order to easily develop an awareness raising campaign on social media, completely at no cost (but your time and an Internet connection). It can be used as a simple starting point to create an ad hoc campaign on a specific topic such as "counterfeit medicines online".

These Guidelines are the results of a research work and a series of meetings and talks that UNICRI carried out with relevant stakeholders involved in the fight against counterfeit medicines within the framework of the project SAVEmed.

The different phases of the process used to develop these guidelines have been fully reported into the "*Report on consumers' awareness on internet sales of counterfeit medicines*".