

19 June 2009

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CAP Code Review
Code Policy team
Broadcast Committee of Advertising Practice
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Dear Sir/Madam

CAP and BCAP Code Consultations

Thank you for giving us the opportunity to respond to your consultation.

As you may know, the General Medical Council licenses doctors to practise medicine in the UK under the provisions of the Medical Act 1983 (as amended). Our objective, as defined in the Medical Act, is to "protect, promote and maintain the health and safety of the public". Our four main functions are:

- a. to keep up-to-date registers of qualified doctors;
- b. to foster good medical practice;
- c. to promote high standards of medical education; and
- d. to deal firmly and fairly with doctors whose fitness to practise is in doubt.

In commenting on your draft Codes, we seek to ensure that any obligations they might impose on doctors (or those working with doctors) will be consistent with the standards we set for their professional practice.

I have commented only on those questions and issues where it seems that we can add some value to the review process – see attached document. I hope this is helpful.

Yours sincerely

CAP Code Review Consultation

Section 12: Medicines, Treatments, Devices and Health

Question 39

i) Taking into account CAP's general policy objectives, do you agree that CAP's rules, included in the proposed Medicines, Treatments, Devices and Health Section are necessary and easily understandable? If your answer is no, please explain why.

The policy objectives certainly seem sensible, and the current and revised rules would appear to support those objectives. It might have been helpful to see some analysis of the impact of the current rules, to evaluate whether all the proposed rules are necessary.

It seems to us that the existing rules, on offering specific advice (12.2 and 12.3) and prohibiting endorsements by health professionals (12.17) could be made clearer, to assist those trying to apply them in practice.

Rule 12.2 states that marketers must not offer specific advice on, diagnosis of or treatment for health conditions unless that advice, diagnosis or treatment is *conducted under the supervision of a suitably qualified health professional*. This might be understood as allowing unqualified people to give advice, diagnose or provide treatment for a condition, as long as they are 'supervised' by a health professional. Is this intended? It does not fit with what we regard as safe practice, or our understanding of the requirements for safe prescribing and supply of medicines.

Is the rule meant to restrict advertising to those services which only use qualified health professionals to provide specific advice, diagnosis and treatment? Reading across to the BCAP Code for broadcast advertising, I see that a revised rule is proposed (11.3) which states that advertisements for services offering personal advice will only be accepted if all the staff providing advice are suitably qualified, subject to regulation, have indemnity cover, and follow professional codes of conduct. It would seem important to have some consistency of practice across the different advertising media. And this proposed rule seems to offer greater protection to the public.

Certainly if rule 12.2 is meant to allow scope for services that are only 'supervised' by health professionals, it would be helpful to indicate what these services might be and the type of supervision arrangements that would not mislead and would protect the public from harm.

Rule 12.3 goes on to state that marketers offering individual treatments may be asked to provide details about the people supervising and administering the treatments. It might be helpful to require marketers to make this information accessible to the public, though not necessarily in their advertisements. You might want to bear in mind that we tell doctors who prescribe or treat patients 'remotely' (without access to the medical records or the

patient's usual doctor) that they must provide their name and GMC registration number to their patients.

Rule 12.6 states that marketers 'should' not make false claims, in contrast to other rules that seem equally important but use 'must'. It would seem sensible to be consistent, even if it might then be necessary to allow a defence of not 'knowingly' making a false claim.

Rule 12.17 states that marketers must not use health professionals to endorse medicines. It would be helpful to say more about what 'endorsement' means, since health professionals do give advice about medicines in the non-broadcast media. Is the rule intended to prevent endorsement of branded medicines and avoid health professionals appearing in 'advertising' content as opposed to factual content? The rule in the BCAP Code (11.5) for broadcast advertisements seems much clearer, in warning against 'implying' professional advice or recommendation.

BCAP Code Review Consultation

Section 11: Medicines, Medical Devices, Treatments, and Health

Services including clinics, establishments and the like offering advice on, or treatment in, medical, personal or other health matters

Question 59

Given BCAP's policy consideration, do you agree that rule 11.9 should be included in the proposed BCAP Code? If your answer is no, please explain why.

As you propose, it would seem helpful to ensure that services can provide credentials for themselves (e.g. registration with the relevant regulatory or inspection body) and the staff who will be offering advice or treatment. Certainly services should be expected to make this information accessible and readily available to potential clients. As we have commented on rule 12.3 of the CAP code, we expect doctors providing 'remote' services to provide their name and registration number to potential patients/clients. It is not easy for members of the public to identify which advertised services are safe and reliable, so including essential information (such as whether a service is registered) in advertisements would be helpful.

The use of health professionals in advertisements

Question 61

i) Given BCAP's policy consideration, do you agree that, unless prevented by law, it is not necessary to maintain the present prohibition on the use of health professionals in TV advertisements for products that have nutritional, therapeutic or prophylactic effects and in radio advertisements for treatments? If your answer is no, please explain why.

ii) Given BCAP's policy consideration, do you agree that rules 11.6, 11.7 and 11.8 should be included in the proposed BCAP Code? If your answer is no, please explain why.

It seems to us that you present well founded arguments (paragraph 11.30 of the consultation document) to support the current Code's prohibition on the use of health professionals to advertise products with nutritional, therapeutic or prophylactic effect (in addition to the legal prohibition on their use in advertising medicines and food). Essentially this recognises a difficulty in distinguishing between claims of 'medicinal' benefit and 'health' benefit and the possibility of the public being misled by the involvement of a health professional.

It is difficult to see how, if the current wider restriction is removed, adequate protection would be provided by the Code's requirement that advertisements do not 'mislead' the public (section 3). The content of section 3 does not appear to bear on the public health and patient safety issues that arise in relation to products which claim to have a health benefit. In the absence of any arguments/evidence that marketers of 'health' products, or the public, are being disadvantaged by the current bar on using health professionals to advertise these products, the points made in paragraph 11.30 weigh in favour of retaining the current restriction.

Certainly, if the restriction is removed, it would seem necessary for you to publish advice about how marketers might avoid the problem of distinguishing between claims of health benefit and medicinal benefit. It would not be within our regulatory role, for example, to provide this sort of guidance to doctors or the marketers using their services.

However, we see no reason to object to permitting the use of health professionals in advertising non-health related products, subject (as proposed) to meeting the general requirements in relation to testimonials and endorsements, declaration of any interests and not misleading the public.

Remote personalised advice

Question 64

i) Do you think the additional requirement, that advice must be given in accordance with relevant professional codes of conduct should be extended to TV, in rule 11.13? If your answer is no, please explain why.

ii) Do you think the additional requirement, that advice must be given in accordance with relevant professional codes of conduct should be extended to TV, in rule 12.3 in the Weight Control and Slimming Section? If your answer is no, please explain why.

It is not clear what the statement means or what it is intended to achieve.

Clinical advice, diagnosis and treatment should follow the standards for good clinical practice set out in, for example, the BNF, NICE and SIGN guidelines, guidance from the Medical Royal Colleges and national service frameworks established by the UK Departments of Health. Professional 'codes' of conduct will require health professionals, for example, to work within their level of competence; to take account of up to date clinical evidence or advice; to act in patients' interests; to protect patients from harm. The GMC does not publish a 'code of conduct'. We publish guidance which all registered doctors are expected to follow in their day to day practice, including where they are providing healthcare services online or by other 'remote' means.

Given that staff providing personalised advice must be registered (and/or accredited) with the appropriate regulator, they will be obliged by their professional code or guidance to act in ways that serve the interests of the person receiving personalised advice. So perhaps, in terms of the BCAP code, it might be sufficient to state that in giving advice staff must act in accordance with the obligations of their regulatory body.

Establishments offering medically supervised treatment

Question 73

Given BCAP's policy consideration, do you agree that advertisements for overseas clinics and other establishments offering medically supervised treatments are, in principle, acceptable if they are run in accordance with broadly equivalent requirements to those established by the Department of Health's National Minimum Standards Regulations? If your answer is no, please explain why?

All establishments offering medically supervised treatment in UK jurisdictions must be registered (with MONITOR or the Care Quality Commission and similar bodies in Scotland, Wales and Northern Ireland). One of the requirements of registration is that the clinic etc must meet the national minimum standards relevant to the service they provide. This will include requirements relating to staff qualifications, experience and registration with their regulatory body, amongst other things. Therefore, it would seem more straightforward to state that only advertisements for registered organisations will be accepted. Then broadcasters' prior vetting arrangements presumably could be focused on checking the organisation's current status with the relevant registration body.

Response from Glasgow Community and Safety Services

- **Introduction**

Routes Out of Prostitution and the Trafficking Awareness Raising Alliance (TARA) are based in Glasgow Community and Safety Services, a joint partnership between Glasgow City Council and Strathclyde Police which was set up to prevent crime, tackle anti-social behaviour and promote community safety in the city. Commercial sexual exploitation is regarded as being widespread in our society and takes many forms including prostitution, trafficking, lap dancing and pornography. It disproportionately involves men using vulnerable women and children for their own sexual gratification or financial gain. We hold the view that exploitation in this way is a clear form of violence against women and a barrier to gender equality.

In relation to the CAP Code Review we welcome the opportunity to comment due to the increased sexualisation of women and girls in the media, and specifically to this review, in advertising. We believe that this pornification of culture by the media acts as a conducive context for violence against women by normalising the portrayal of women and girls as sex objects, not people. The main argument against our critique of the UK advertising industry will undoubtedly centre on the right to “freedom of expression”. However, we overwhelmingly believe that when it comes to balancing these competing rights, the right of all women to live free from discrimination and sexist attitudes must take precedence.

Thus, we fully support CAP's proposed policy objective that all non-broadcast marketing communications covered by the CAP code are legal, decent, honest and truthful and most crucially are prepared with a due sense of social and professional responsibility. In light of the huge influence that advertising and the media has on individuals, especially young people it is clear that the advertising industry must uphold their commitment to responsible advertising.

- **The harm caused by sexist advertising**

The sexual objectification of women through advertising can lead to a range of harms from body and self esteem issues to violence, sexist attitudes and racism. Images of thin, highly sexualised young women now saturate the advertising industry.

Impact:

- At an individual level sexualisation in the media can undermine body self-esteem and confidence which can result in increased incidence of eating disorders, the desire for plastic surgery and constant monitoring of appearance.
- Young people increasingly learn about sex and relationships through the media. The portrayal of women as objects and in provocative poses helps reinforce the views of young men that women are always sexually available. This grooms young men into expecting the sexual acts normalised in pornography and impacts on their ability to build healthy, mutually respectful relationships.
- Adults exposed to sexually objectifying images of women from mainstream media are significantly more accepting of rape myths, sexual harassment, gender role stereotypes.

Pornified images in the media, whereby women are reduced to body parts, ultimately creating the conditions where violence against women can thrive.

- BME women have historically suffered from stereotypes that focus on their sexuality and their bodies. This has been further amplified by the mainstreaming of pornography into popular culture e.g. porn stereotypes are now mainstream such as women of Asian origin being portrayed as sexually submissive.

- **Recommendations**

In light of the harms outlined by irresponsible, sexist advertising we are pleased the CAP has included a section in the Review (part 2, section 4), entitled “harm and offence”. In particular we support the commitment to ensuring marketing communications “contain nothing that is likely to condone or encourage violence or anti-social behaviour”. GCSS believes that these proposals outline a commitment to greater social responsibility in the media and we would hope these recommendations are adhered to.

There is the concern that voluntary codes can prove meaningless in relation to long term impact. Therefore we would recommend that gender equality be mainstreamed into media regulation – at present concerns relating to the sexualisation of women are judged solely on the grounds of obscenity and decency. We would suggest that this must be extended to gender equality by bodies such as OFCOM and ASA and this regulation is enacted via legislation in order to enhance its credibility.

Since 2003, Jobcentre Plus (JCP) has accepted and advertised jobs from within the adult entertainment industry such as positions for “lap dancers”, “strip webcam performers” and “escorts”. We are concerned that the sex industry is further attempting to mainstream and normalise its activities by advertising through the JCP and that JCP by agreeing to promote these adverts is offering an expedient pathway for vulnerable women to become part of the sex industry. Although it may be out with the remit of this Consultation paper, we still consider it important to reiterate once again the need for the Department for Work and Pensions to reverse this policy.

To conclude, we are happy that CAP are outlining a commitment to ensuring advertising materials do not condone or encourage violence and anti-social behaviour. Ideally, we would be in favour of legislative sanctions banning all forms of pornographic material and adverts containing such objectifying images due to our belief that it is degrading to the women involved, harmful to users and complicit in violence against women both in its production and consumption. A society in which the dominant message is that female worth comes only from physical appearance is a harmful one and we would hope that CAP takes its obligation to ensure marketing communications are socially responsible seriously.

Introduction

Global Radio is the largest radio broadcaster in the UK, with over 70 radio stations across 60 locations. Our share of the commercial radio market for radio in the UK is just over 40% and our radio stations carry advertisements covering many different categories contained in the code.

Having considered the consultation documents, we are broadly in agreement with the proposals and support BCAP's 'tidy-up' of the current code. Given the length and depth of the document, we have only responded to those questions where we have comments or feedback.

Consultation

Question 3: Rules 2.1 and 2.3

We have some concerns that these rules go somewhat further than the current BCAP Code rules for radio. In particular, the phrase 'style reminiscent of editorial content' would appear to throw into doubt the use of presenter-read ads on speech radio stations. The current BCAP Code, at Section Two Subsection 1 (Transparency and Clear Separation of Advertising) makes specific provision for references to sponsored programming, and advertising messages for a station's own activities. Both of these provisions come with the overarching requirement for separation, and we expect that these principles will be maintained under the proposed rules 2.1 and 2.3, either in the Code itself, or by way of guidance on the Code.

Question 9: Rule 3.13

Whilst we are not disagreeing with the principle of this rule, we would appreciate some clarification on who would be responsible for deciding what constitutes 'a significant division of informed or scientific opinion'. This, we feel, will be particularly relevant to issues such as global warming and environmental issues.

Question 11: Rule 3.27

We remain unsure as to how we can be satisfied that our clients have 'made a reasonable estimate of demand'. It is our understanding that this clause is currently satisfied by providing an undertaking to RACC, or the ASA in the event of a complaint, but this seems a fruitless exercise – were we to be unfortunate enough to have a 'rogue trader' client, they could simply supply us with a false undertaking, and listeners and consumers would be no better off. We feel the principle of appropriately estimating demand is sound, but the measures to ensure compliance appear not to be effective. Additionally, a significant amount of extra time and administration would be required

for broadcasters to make this assessment, not to mention that broadcasters are not qualified to assess, for example, whether a particular stock level advertised at a particular price with a certain campaign weight is sufficient.

Question 16: Rule 3.22

This Rule seems somewhat complicated. We agree with the principle, but the wording seems overly complicated for describing it. If this rule is to apply solely to the scenario of monthly subscriptions that require a one-off set up fee, then perhaps the rule could be re-drafted to reflect exactly that; if not, we would be grateful for further examples of scenarios which would be covered by this rule.

Question 25: Rule 4.10

Similarly to question 9, we would appreciate some clarity on how the ASA will assess what constitutes 'behaviour grossly prejudicial to the environment'. Furthermore, this rule reflects Article 3e1(c)(iv) the AVMS, by which television, but not radio, is covered. Whilst we are content with the principle, we would like to note that this does not indicate our general support for television rules to be transposed to radio without careful consideration of their relevance to the medium. We would also appreciate confirmation that this rule will not be used to prevent the advertising of, for example, petrol-driven vehicles, without good reason or further legislation.

Question 28: Rule 5.7

The principle of not causing mental, moral or social harm to children is important, and we absolutely agree that this should remain; however, we are concerned that rule 5.7 could be interpreted in a broad fashion, and provide more restrictions than are proportionate. In particular, we would be grateful for some further guidance on material which BCAP believes would be caught by this rule. We presume that this rule is intended to prevent, for example, the revelation that 'Santa does not exist', but we would be grateful for some confirmation that it will not be interpreted more broadly.

Question 33: Rule 5.4

The potential for this rule to be interpreted broadly is quite large, especially outside the bounds of food and drink advertising. We agree that any advertising for food and drink products shouldn't encourage practises that are detrimental to children's health; however, a product such as rollerblades, for example, might be captured by this rule if its interpretation is particularly broad. We do not feel that this is the intention of this rule and therefore that it should be more narrowly drafted accordingly.

Questions 38 to 44: Rule 8.3 and subsections

Similar to our response to Question 11, we remain concerned about our ability to police our clients' activities to ensure compliance with this proposed section of the Code. Once an ad for a particular product has been broadcast, we have no control over whether that client then tells consumers about the substitute products they intend to supply; similarly, we are in no position, legally or otherwise, to force a client to send out refunds to customers.

As such, we understand that these rules, as in the current BCAP Code, are satisfied by an undertaking from the client. Again, this seems like a fruitless exercise. We appreciate that these rules have been drafted to try to help protect consumer from 'rogue' operators, but if our clients are determined to treat their customers with disdain and not abide by their regulations as set out in the CPRs and similar legislation, then a false undertaking from that client will have no positive effect on the poor service received by those customers.

Question 122: Rule 22.5

At present, the PhonepayPlus 11th Code of Practices obliges Service Providers to ensure that they give a non-premium rate telephone number for customer care purposes. Current industry practice is for radio ads to either include that number or, more commonly, a website address, which will allow listeners to look up such information (along with other compulsory information). The proposed new rule does not make it clear whether the inclusion of such a web address will satisfy this obligation.

Furthermore, the proposed rule places an unnecessary burden on broadcasters. The obligation in the Code of Practice sits with the service provider, not the broadcaster of the ad. Many radio stations that form part of a network (as do ours) are likely to have such advertising campaigns booked at a national or network level, and as such, individual stations will not necessarily have any information about centrally-booked ads. Whilst we would be happy to 'retain' the number for our records (which we would have to provide to RACC in any case, as a part of the clearance process), we feel that the obligation to 'make available on request' such a number is a burden too far for broadcasters.

Question 135: Rule 27.4

Along with Questions 11 and Questions 38 to 44, we do not feel that it would be appropriate for broadcasters to be obliged to check the information and advice given to users of a service before we broadcast advertisements for such a service. This rule would oblige us to check all documentation and advice given by such clients to their users before we broadcast an ad for that service. We understand that protection for users of such services is important, but regulation of the advertising of such services seems an inappropriate way of providing such protection.

Conclusion

Global Radio is broadly in favour of the proposed new Code; we acknowledge and appreciate that it is the result of a significant amount of work by various parties and working groups. We note that, from the perspective of a large radio broadcaster, there are some significant proposed de-restrictions. Where we feel that the proposed Code places an undue burden on us, this is noted above, but largely we are happy with the changes.

Carina Tillson
Head of Compliance and Regulatory Policy
Global Radio

June 2009



BCAP Code Review
Code Policy Team
Broadcast Committee of Advertising Practice
Mid City Place
71 High Holborn
London WC1V 6QT

17th June 2009

Dear Sirs

BCAP Code Review – Consultation on the proposed BCAP Broadcast Advertising Standards Code

My company is an advertising agency. We bill roughly half of our turnover with advertisers in the premium rate sector. We are fully recognised and accredited to all the major UK and European media owners through organisations like the NPA, PPA, TVeye etc.

We are members of AIME the trade association that promotes excellence in the Interactive Media and Entertainment industry. I therefore support the submission AIME have made on behalf of the industry.

Our interest in this process is to develop our business through increasing the amount of advertising placed by our clients.

Our clients (most of whom are members of AIME) are more likely to be encouraged to place more advertising if some of the current restrictions are relaxed or lifted. The increased business this will generate will have a positive impact on profits and employment in our businesses, the advertiser's and media owner's businesses and the ancillary services we will inevitably buy in from UK based companies to create more advertising.

The specific areas in addition to the responses from AIME I consider most significant are:

Question 97 – I would ask the panel to consider allowing live tarot, horoscope and fortune telling advertising to appear on TV as in Germany and other European countries. These services would be marketed as

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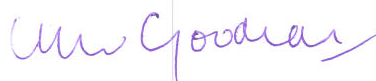
Registered in the UK No 3674944

entertainment products just as they are in just about every UK national newspaper and consumer magazine.

Question 124 – I would ask the panel to revise the restrictions on copy for TV advertising for premium rate voice and download services. It makes no sense to me that we can watch films and programs showing acts of heavy sexual nature yet we can't use films in our commercials of actors without shirts on or actresses wearing lingerie. I believe the restrictions need to include later time bar so there is a second watershed say at midnight after which more explicit language and imagery is allowed. Clearcast do an excellent job of implementing the guidelines so I am sure they will apply any new code rigorously. Again a number of newspapers and magazines carry advertising for these services.

I look forward to hearing the outcome of the review and would be willing to expand on any areas the committee may wish to investigate further if it was felt anyone from this company could make a contribution

Yours sincerely,



Clive Goodman
Director



The Guild of Spiritual Doctors
of
THE ALMIGHTY TRIUNE GOD

- 7 APR 2009

Dilige animas

Associate President
Mrs. Janet Canice-Wade

26 East Parkside
Flat 20
Edinburgh, EH16 5XN

6th April, 2009

The Advertising Standards Authority,
Mid City Place,
71 High Holborn
LONDON, WC1V 6QT

Dear Members,

Re: Advertising Abortion and Condoms

Abortion must never be advertised on television or anywhere else. Abortion not only destroys precious life, it also gravely jeopardizes precious immortal souls for all eternity. Abortion is gravely sinful.

The alternatives must always be used - true tender loving care and support for the mothers and children, and for the fathers too, and, if needed, fostering and adoption.

Likewise, condoms must never be advertised on television or anywhere else. Condoms encourage the grave sins of lust, promiscuity and sexual immorality. Condoms themselves are gravely sinful because they prevent the complete unitive act. Abstinence is the only way.

With our humble prayers for us all, the whole of Almighty God's creation, in The Most Loving, The Most Just Almighty Triune God - The Father, The Son and The Holy Spirit,

I am, Yours sincerely,

Janet Canice-Wade (Mrs.)
Associate President

HERTS & ESSEX SHOOTING ASSOCIATION RESPONSE TO THE BCAP CODE REVIEW

The Herts and Essex Shooting Association responds to the BCAP Code review by answering No to Questions 55 and 56.

Question 55

Given its policy consideration, do you agree with BCAP's proposal to strengthen the present prohibition on TV advertisements for guns by prohibiting advertisements for offensive weapons and replica guns? If your answer is no, please explain why.

NO

The Herts and Essex Shooting Association objects to the description of a gun club as being a 'vehicle for the incitement of criminal activity'.

The very use of the term 'gun club' suggests a complete lack of knowledge of the position of guns and shooting as a lawful recreation.

An individual's interest in shooting and/or guns can range from the control of vermin and informal airgun shooting, through participation in Olympic target shooting at an approved club to the research and collecting of historic firearms.

All these and the variations in-between are perfectly respectable, legal and regulated.

Participants in legitimate shooting are from all social and ethnic groups and include young people and adults and range from students to members of the Royal Family.

Shooting clubs are very social and uphold safety and lawfulness as their greatest concerns.

Without exception, shooting clubs subject potential members to a supervised probationary period before deciding on inviting inclusion into full membership. All members of shooting clubs are approved by the police.

None of this can possibly be construed as encouraging crime or the criminal use of weapons.

Collectors and researchers of historic firearms are academic in their approach to shooting. Their concentration on the minutiae of manufacturing, mechanism, history rarity has no attraction to anyone of criminal intent.

To propose that the advertisement of legal shooting sports in approved clubs could provoke criminal activity or widespread horror and revulsion is preposterous.

Better to look at the content of broadcast drama including films and made for TV programmes that glorify the reckless and dangerous use of weapons and trivialise the harm and damage they do.

Such programmes really do offend, They alone in the media encourage the unlawful use of guns particularly by the young and criminal minded.

Question 56

Given its policy consideration, do you agree with BCAP's proposal to extend the present radio exception to the rule for references to clay pigeon shoots in advertisements only if they are promoted as part of a wider range of outdoor pursuits? If your answer is no, please explain why.

NO

Clay pigeon shooting is a lawful recreation enjoyed by adults and young people from all social classes. It is, within its various disciplines, an Olympic sport. It is not a solitary sport; participation requires the organization of venues, equipment and supplies. This is done at club level or at a commercially run venue which usually includes a tutoring facility.

Safety is paramount, whether in gun handling, ear and eye protection or interacting with other individuals.

As with other target shooting sports the participation by young people teaches them team spirit, safety, discipline and helps them develop into model citizens.

There is no relationship between clay pigeon shooting and crime. It is inconceivable that any advertisement for a clay pigeon shooting venue or event could cause offence or incite lawlessness.

Conclusion

The inclusion of legitimate shooting interests ('gun clubs') in this review shows a complete lack of understanding of the subject and is symptomatic of a general bias against shooting in the media.

By equating shooting with obscene publications the authors of this review have offended thousands of legitimate, decent and law abiding shooters and enthusiasts.

The Herts and Essex Shooting Association respectfully suggests the activities inherent in the term 'gun clubs' are removed completely from this review.

