

Industry Consultation on DDPs

A. Name of Organisation:

SMRT Experience Pte Ltd

B. Correspondence address, contract number and email address:

[Redacted]

C. Description of current service provided by organisation:

Media assets owner and marketing agent for advertising

D. Comments

Public Service Broadcasting Requirements

16. The PSB programmes shall comprise 50% of the duration of each loop of content displayed on each Distribution Network DDP, and there will be no payment or subsidy required of the Government. PSB programmes are also broadcast by Mediacorp, Singapore's free-to-air broadcaster regulated under the BA.

Comments: Please confirm this will supersede the current stipulated percentage imposed by HDB and Town Councils.

Obligation Under Code

Advertising and Promotion

1.2 Any advertisement that promotes, or are designed to publicise

- a) Any goods (including a film), any brand of product or services, but not any health-related goods and services; or
- b) Any event which not cause-related event

Comment: The definition of health-related goods, under Health Products Act (Cap 122D) is too broad. It includes products such as paracetamol, health supplements, toiletries products such as fragrances, shampoo, face wash, toothpaste, etc. Advertising of health-related products have always been permissible if their benefits are not misrepresented. If health-related goods can be advertised on print and television which reaches out to the mass, why can't it be allowed on public DDPs?

Part 2: Impermissible Content

Race & Religion

- 2.5. It states that any reference to any religious events or teaching or instruction falls under impermissible content
- 2.6. It states that any advertisement made by or on behalf of any religious organisations falls under impermissible content

Comment: This is too restrictive. It means that a Church or a Temple cannot advertise its Christmas or Vesak celebration events respectively. The current ASAS Code of Advertising Practice permits advertisement by religious organisations if it does not subvert any other religious values.

Singapore Code of Advertising Practice (CAP)

- 1.4 All advertisement shall not subvert the shared values in Singapore's society including:
 - (a) Nation before community and society above self;
 - (b) Family as the basic unit of the society;

- (c) Community support and respect for the individual;
- (d) Consensus, and not conflict; and
- (e) Racial and Religious harmony.

Please review to align for consistency with CAP.

Coarse language, Horror and Violent

2.10. Any coarse language, any frightening or disturbing sequences, or any depiction or description of acts of torture, cruelty or violence (whether or not sexual) or of abhorrent phenomena, whether natural or pertaining to the supernatural.

Comment: There is no clear guideline for Point 2.10 and threshold for coarse language, horror and violent are subjective to different individual. We proposed to align with the current Film Act classification guideline and go with the approved grading which is PG and below for clarify.