

impression of any person, group or party critical of the government.

**20.** In some of the foreign jurisdictions there is a mechanism for review of advertisements on fixed parameters even before they are published and publication/issuance thereof only upon passing of the required test. In Australia and United Kingdom, there is an added emphasis on the cost effectiveness of advertising campaigns. In Australia, advertising campaigns of more than a particular pecuniary value i.e. 1million Australian dollars require to undergo a cost benefit analysis wherein the best options to achieve the intended objective of the campaign has to be determined before launching the same.

**21.** The good practices adopted in other jurisdictions as noticed above do find adequate reflection in the recommendations of the Committee which further fortify our conviction to adopt the same.

**22.** This will require the Court to consider the different aspects of a government advertisement campaign highlighted earlier on which we have reserved our comments. The first is