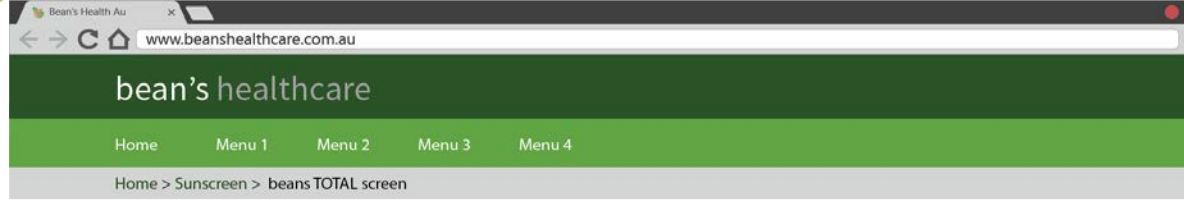


Advertising example



Issues explored in this example

- Substantiation of claims
- Sunscreen role depiction
- Mandatory statements
- Endorsements



bean's TOTALscreen

- UVA and UVB protection
- Very high protection
- Dry touch, light finish

\$19.97

Buy now!

INGREDIENTS:

What's most important about beansTOTALscreen is what it **doesn't** contain:

- Preservatives
- Oxybenzone **FREE**

Actives

Non-nanotech Zinc Oxide 100mg/g
Butyl Methoxydibenzoylmethane 50mg/g

HEALTH WARNING/HOW TO APPLY:

Sunscreens are only one part of sun protection.
We recommend reapplication of
BeansTOTALscreen every 2 hours.
Prolonged, high risk exposure should be avoided.

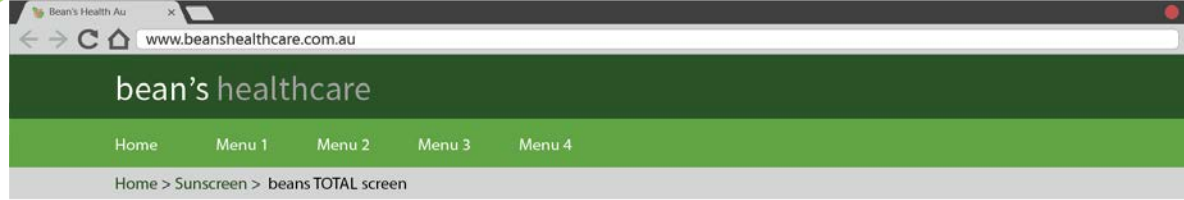


I have struggled with sensitive skin for years. As a pharmacist, I watched my customers struggle with the same conditions I faced and knew I needed to use my skills to develop a product that could meet their needs and my own. BeansTOTALscreen was born from that.

These advertising examples are intended to be used as an educational aid to illustrate potential non-compliance with the therapeutic goods advertising requirements in Australia. The Australian Government Department of Health (of which the TGA is a part) advises that these examples should not be relied upon as representing a comprehensive description of the regulatory requirements.

The compliance of each advertisement has to be assessed on a case by case basis. To obtain further assistance regarding your advertising and what is required to address non-compliance with the requirements of the Therapeutic Goods Act 1989, the Therapeutic Goods Regulations 1990 and the Therapeutic Goods Advertising Code (No. 2) 2018, you may wish to seek independent legal advice or the assistance of a regulatory affairs consultant.

Advertising example



Substantiation of claims

- Product name 'bean'sTOTALscreen' implies it provides total protection from the sun
- The advertiser must hold appropriate evidence to support this claims. Without substantiation, it is **an exaggeration of efficacy** and not accurate or truthful, therefore **false and misleading**
- Refer to Code sections 9(b) and 10(a)(ii)



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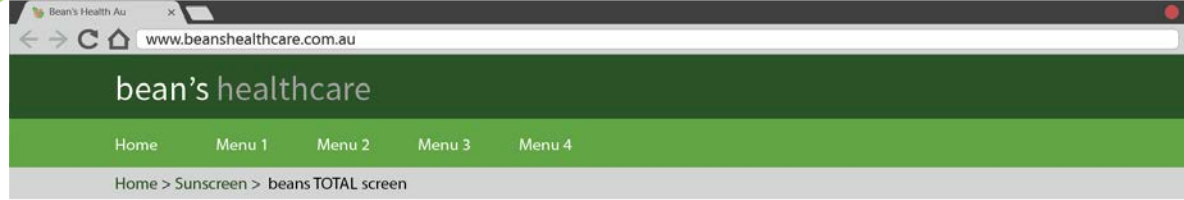
Actives

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Butyl Methoxydibenzoylmethane 50mg/g

HEALTH WARNING/HOW TO APPLY:

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Prolonged, high risk exposure should be avoided.

Advertising example



Sunscreen role depiction

- Product name 'bean'sTOTALscreen' implies it provides total protection from the sun
- This does not **depict sunscreens as being only one part of sun protection**
- The ad does include a message:
 - 'sunscreens are only one part of sun protection'
- However, this is not sufficient to depict sunscreens as one part of sun protection
- Refer to Code section 27(2)(a)



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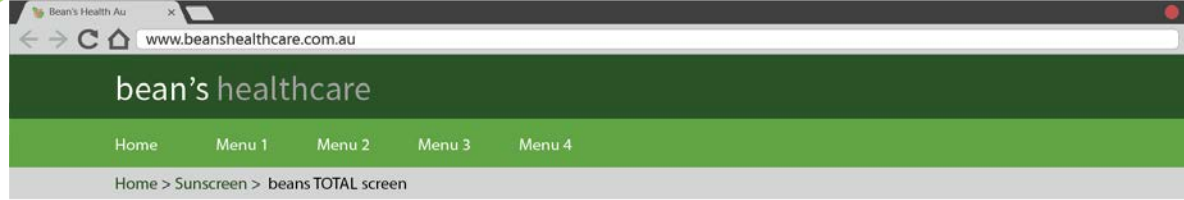
HEALTH WARNING/HOW TO APPLY:

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We recommend reapplication of BeansTOTALscreen every 2 hours.

Prolonged, high risk exposure should be avoided.

Advertising example



Mandatory statements and product details

- Statements required in relation to the type of therapeutic goods specified are **missing or incomplete** and **not prominently displayed**
- Not requiring a **health warning**, it must include the statement: ALWAYS READ THE LABEL
- Ads must also include:
 - a complete list of ingredients
 - the statement: FOLLOW THE INSTRUCTIONS FOR USE
- Refer to Code sections 12(5)(d), 12(5)(e) and 13(6)



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Actives

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Butyl Methoxydibenzoylmethane 50mg/g

HEALTH WARNING/HOW TO APPLY:

Sunscreens are only one part of sun protection.

We recommend reapplication of BeansTOTALscreen every 2 hours.

Prolonged, high risk exposure should be avoided.

Advertising example



Mandatory statements and product details

- Ads for sunscreens must **prominently display** statements to the effect that:
 - prolonged **high-risk sun exposure** should be avoided; and
 - frequent re-application or use in accordance with directions is **required for effective sun protection**
- Refer to Code section 27(2)(b)



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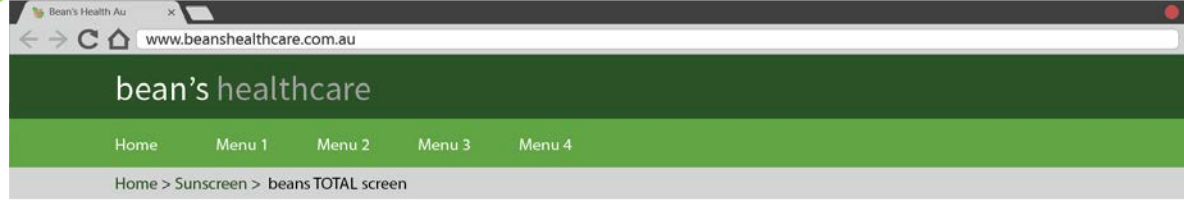
Actives

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Butyl Methoxydibenzoylmethane 50mg/g

HEALTH WARNING (HOW TO APPLY):

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Advertising example



Endorsements

- Includes imagery and a statement which is presented as an endorsement from someone identified as a pharmacist
- Endorsements from **health care professionals** are not permitted
- Refer to Code section 16(2)(c)

bean'sTOTALscreen



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Actives

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Butyl Methoxydibenzoylmethane 50mg/g

HEALTH WARNING/HOW TO APPLY:

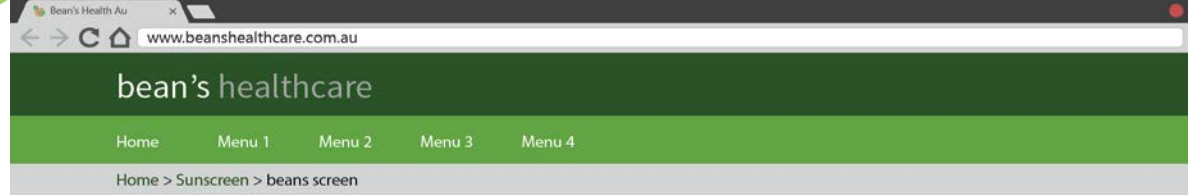
Sunscreens are only one part of sun protection.
We recommend reapplication of BeansTOTALscreen every 2 hours.
Prolonged, high risk exposure should be avoided.

Advertising example

Compliance

In this version:

- Claims of efficacy are appropriate
- Sunscreen is more clearly depicted as being only one part of sun protection
- Mandatory statements are included, correct for the goods and prominently displayed
- Complete list of ingredients is included
- Endorsement is compliant as it:
 - names the organisation
 - discloses the nature of the endorsement
 - discloses the valuable consideration received for the endorsement



bean's screen

- UVA and UVB protection
- Very high protection
- Dry touch, light finish

\$14.95

Buy now!

Always read the label
Follow the directions for use



Don't forget to SLIP, SLOP, SLAP.
SEEK shade where you can and SLIDE
on some sunnies to protect your eyes.

INGREDIENTS:

Preservatives:
Hydroxybenzoates

Actives:

Zinc Oxide 100mg/g
Butyl Methoxydibenzoylmethane 50mg/g
4-Methylbenzylidene Camphor 40mg/g
Octocrylene 20mg/g
Bemotrizinol 15mg/g

HOW TO APPLY:

Apply 20 minutes prior to sun exposure. Sunscreen is only one part of sun protection. Wear protective clothing. Seek shade. Avoid prolonged sun exposure. Reapply Bean's screen every 2 hours and after swimming and perspiring, in accordance with directions.

* the Melanoma Council receives \$1 from the sale of each product in the bean's screen range



Australian Government

Department of Health
Therapeutic Goods Administration