

COMPLAINT NUMBER	16/401
COMPLAINANT	A. Abernethy
ADVERTISER	Glaxo Smith Kline
ADVERTISEMENT	Glaxo Smith Kline Television
DATE OF MEETING	13 December 2016
OUTCOME	Not Upheld

SUMMARY

The 30-second Family Health Diary Glaxo Smith Kline television advertisement for Polident denture adhesive showed Jude Dobson at a table with a group of denture users. The advertisement said that Polident “seals out 74 percent more food.*” The asterisk by this claim pointed to a qualifying statement at the bottom of the screen which says: “vs no adhesive on lower denture.”

The Complainant was concerned the advertisement for Polident denture adhesive claimed that it sealed out 74 percent more food but failed to clarify more than what, how the 74 percent measurement was obtained and whether the food involved was liquid or solid.

The Complaints Board said the Advertiser had substantiated and explained the claim for the advertised product which was an adhesive rather than a therapeutic product.

The Complaints Board ruled the complaint was Not Upheld.

[No further action required]

Please note this headnote does not form part of the Decision.

COMPLAINTS BOARD DECISION

As a preliminary matter, the Chair discussed the relevant Code of Practice with the Complaints Board. While the complaint had initially been allocated under the Therapeutic and Health Advertising Code, on receipt of information from the Advertiser, the Chair confirmed the product did not serve a therapeutic purpose and the advertisement was to be considered under the Code of Ethics.

The Chair directed the Complaints Board to consider the advertisement with reference to Basic Principle 4 and Rule 2 of the Code of Ethics. This required the Complaints Board to consider whether the advertisement had been prepared with a due sense of social responsibility to consumers and to society and whether it was truthfully presented, that is whether it contained any statement or visual presentation or created an overall impression which directly or by implication, omission, ambiguity or exaggerated claim was misleading or deceptive, was likely to deceive or mislead the consumer, made false and misleading representation, abused the trust of the consumer or exploited his or her lack of knowledge.

(Obvious hyperbole, identifiable as such, is not considered to be misleading)

The Complaints Board ruled the complaint was Not Upheld.

The Complaint

The Complaints Board considered the Complainant's concern that the advertisement claimed Polident "seals out 74% more food" without saying more than what, how the measurement was calculated or what type of food, liquid or solid, that it was referring to.

The Advertiser's Response

The Complaints Board then turned to the response from the Advertiser, Glaxo Smith Kline (GSK) who did not consider the Complainant had presented a complaint about the advertisement but was asking for clarity "in respect of the factual basis on which the claim 'seals up 74% more food (when compared with no adhesive on lower denture).'"

The Advertiser said in part that a GSK "Food Occlusion Study Report" had been conducted to evaluate the performance of Polident denture adhesives for preventing food particles from becoming trapped under dentures. The Advertiser said in part that "a randomised, single centre, examiner blinded 3-way cross over study was conducted to evaluate two denture adhesive formulas as compared to no adhesive use. Fifty four (54) subjects with well-made and well-fitting denture completed the study. Efficacy was evaluated based on objective measure of food occlusion and the Kapur Index (a scale for determining denture retention and stability) as assessed by a trained investigator." The Advertiser said food entrapment had been quantitatively measure in the study by collecting and weighing residue from beneath the dentures after subjects chewed and swallowed 32 grams of a peanut test meal, "a reference surrogate for a worst-case food."

The Advertiser said it was reasonable to assume other foods would behave similarly or offer less entrapment than peanuts and that liquids did not need to be tested as they freely moved through the denture. The Advertiser submitted a table showing study results for the weight of peanuts retrieved under dentures that showed that Polident denture adhesive "demonstrated highly significant ($p < 0.0001$) improvements ((74% compared to no adhesive) with regard to prevention of food particles from becoming trapped under the lower denture."

The Advertiser said in the clarification requested by the Complaints Board that the purpose of the advertisement was to show the best use and benefits of a denture adhesive and the food seal claim was a secondary benefit at the end of the advertisement. The insight behind the advertisement was the significantly smaller use of denture adhesives than denture cleaners and the hope was to encourage denture wearers to use adhesives. The purpose of the advertisement was not to encourage decision making solely on Polident's food sealing properties.

The Media Response

The Complaints Board then turned to the response from the Commercial Approvals Bureau (CAB) on behalf of the media. CAB said it had approved the Glaxo Smith Kline advertisement from Brand World Ltd on November 16, 2016, with a G classification and deferred to the Advertiser's clarification of details and substantiation for the claim that Polident denture adhesive "seals out up to 74% more food.*"

The Complaints Board Discussion

The Complaints Board agreed that the product advertised, Polident, was a form of adhesive and not a therapeutic product. The Board therefore considered the advertisement under Basic Principle 4 and Rule 2 of the Code of Ethics.

The Complaints Board noted the small print of the disclaimer at the bottom of the screen that

related to the onscreen statement “Seals out up to 74% more food.*” The small, white lettering said: “vs no adhesive on lower denture.” The Complaints Board noted the Complainant may not have seen the disclaimer and agreed it was important that qualifying statements in advertising be legible.

The Complaints Board noted that the adhesive was shown being applied to the top denture rather than the bottom denture which was the focus of the research but accepted this was for the ease of illustrating the process of how to use the adhesive.

The Complaints Board accepted the study on the efficacy of Polident in food occlusion gave sufficient weight to the claim in the advertisement of sealing out 74 percent more food and was not misleading.

The Complaints Board agreed the claim was supported by evidence presented by the Advertiser and the advertisement was not in breach of Basic Principle 4 or Rule 2 of the Code of Ethics.

Accordingly, the Complaints Board ruled the complaint was Not Upheld.

DESCRIPTION OF ADVERTISEMENT

The 30-second Family Health Diary television advertisement for Polident denture adhesive was fronted by Jude Dobson who was shown at a table where a group of denture users was eating. Ms Dobson said: “If you wear dentures you don't want them loosening while you're speaking or eating.” A picture of a Polident box appeared on the screen and Ms Dobson continued: “That's why Polident is New Zealand's number one denture brand.” A banner on the screen said “#1 brand in New Zealand.” Ms Dobson also said: “Not only that, Polident denture adhesive seals out 74 percent more food.” The onscreen words “Seals out up to 74% more food” were qualified by an asterisk which pointed to the words: “vs no adhesive on a lower denture.” The last frame of the advertisement had the Family Health Diary logo, a picture of a Polident package and, at the bottom of the screen, a reference to the GSK group.

COMPLAINT FROM A. ABERNETHY

“Advert for Polident denture adhesive claimed “Seals out up to 74% more food”. More than what? How is 74% measured? What type of food-liquid or solid?”

CODE OF ETHICS

Basic Principle 4: All advertisements should be prepared with a due sense of social responsibility to consumers and to society.

Rule 2: Truthful Presentation - Advertisements should not contain any statement or visual presentation or create an overall impression which directly or by implication, omission, ambiguity or exaggerated claim is misleading or deceptive, is likely to deceive or mislead the consumer, makes false and misleading representation, abuses the trust of the consumer or exploits his/her lack of experience or knowledge. (Obvious hyperbole, identifiable as such, is not considered to be misleading).

RESPONSE FROM ADVERTISER

GSK does not consider that A. Abernethy has raised a complaint in respect of the TVC, however, they have asked for clarity in respect of the factual basis on which

the claim "seals up to 74% more food (when compared with no adhesive on a lower denture)."

Denture wearers often are faced with the problem of food getting caught under their dentures, which can lead to discomfort and may also compromise oral hygiene. Use of denture adhesives, such as Polident Denture Adhesive, is reported to improve denture comfort and stability, and to quantitatively reduce food entrapment during eating.

A GSK Food Occlusion Study Report was conducted to evaluate the performance of Polident denture adhesives for preventing food particles from becoming trapped under dentures.

A detailed description of the study follows:

GSK research and development conducted a Food Occlusion Study (Report L3920658) to evaluate the performance of denture adhesives for preventing food particles from becoming trapped under dentures.

The aim of this study was to quantitatively assess the ability of adhesives to reduce food entrapment beneath well-fit complete dentures during eating.

A randomized, single centre, examiner blinded, 3-way cross over study was conducted to evaluate two denture adhesive formulas as compared to no adhesive use. Fifty-four (54) subjects with well made and well fitting dentures completed the study.

Efficacy was evaluated based on objective measure of food occlusion and the Kapur Index (a scale for determining denture retention and stability), as assessed by a trained investigator.

Food entrapment was quantitatively measured by collecting and weighing residue from beneath the dentures after subjects chewed and swallowed 32 grams of a peanut test meal. Peanuts are a reference surrogate for a worst-case food as they are commonly regarded as a food that creates variable and difficult to deal with food particles prone to entrapment. Thus it is reasonable to assume that other foods will behave similarly, or offer less entrapped food than peanuts, so allowing a broad based claim without the need to test numerous food types. Similarly liquids do not need to be tested as they freely move through the denture, just as the oral cavity's normal saliva acts.

The table below shows results for the weight of peanuts retrieved under the dentures. Compared to the control arm of no adhesive, adhesive resulted in highly statistically significant ($p < 0.0001$) less weight of peanuts recovered under lower dentures.

Food Occlusion - Comparisons of Recovered Weight of Peanuts (Grams) - Population (N=54)

	No Adhesive LS Mean (SD)	Polident Adhesive Cream LS Mean (%) (SD)
Lower Dentures	0.038 (0.0453)	0.010* (74%) (0.0109)

*Indicates p-value < 0.0001 for comparing corresponding adhesive adjusted mean to the adjusted mean of the No adhesive group
LS mean indicates an adjusted mean and (%) indicates the percentage of more peanuts sealed out by the study adhesive compared to no adhesive. SD indicates between subject standard deviation

The study demonstrated that the Polident denture adhesive demonstrated highly significant ($p < 0.0001$) improvements (74% compared to no adhesive) with regards to prevention of food particles from becoming trapped under the lower denture.

GSK trusts that the above answers the questions raised by A Abernethy, and should they have any further questions about the Polident Denture Adhesive, or any other products, please let them know that they can contact our consumer relations hotline on 0800 540 144.

Additional Response from the Advertiser

1. Polident is a cosmetic product, not a therapeutic or health product, and so should be considered under relevant the clauses presented in the Advertising Code of Ethics. Nevertheless, the response I have provided would not be impacted by this change in code applicability, as the substantive elements remain the same. The key difference, being cosmetic, is that the advertisement should be adjudicated on the basis that it was prepared with a due sense of social responsibility to consumers and to society. Therefore I am happy for the matter to proceed based on the response provided.
2. The purpose of the advertisement is meant to be illustrative of the manner of how best to use an adhesive, and benefits derived from the use of a denture adhesive (stable secure hold, and cushioning for comfort), the food seal claim is only presented as a secondary benefit at the end of the advertisement.

The insight behind the advertisement is that compared to the use of denture cleansers the use of denture adhesives is significantly less. By describing the benefits of adhesives it is hoped that denture wearers will be encouraged to use them, however is not the purpose of the advertisement to rely solely on food sealing properties as the principal decision making attribute.

RESPONSE FROM MEDIA: COMMERCIAL APPROVALS BUREAU

CAB approved this Brandworld commercial on 07/11/16 with a G classification.

The commercial advertises the Polident brand of denture adhesive, and contains the claim their latest product, "Seals out up to 74% more food.*"

The advertiser has at hand details and substantiation for this claim, and therefore CAB will defer to them for clarification.