

COMPLAINT NUMBER	19/317
COMPLAINANT	R Kennedy & R Ward
ADVERTISER	Asaleo Care Limited
ADVERTISEMENT	Libra Blood Normal, Television – OnDemand
DATE OF MEETING	24 September 2019
OUTCOME	Not Upheld No Further Action Required

Description of Advertisement

The Libra Blood Normal OnDemand television advertisement shows various images relating to periods including red liquid being poured onto a sanitary pad, a woman asking for a pad across a crowded table and a man shopping for sanitary products. It also shows blood running down a woman’s leg in the shower and a pixelated sanitary pad being removed from underwear. The text says “Why is it considered unacceptable to show period blood? Periods are normal. Showing them should be too.”

Summary of the Complaints

There are two complaints for this advertisement. Both Complainants were watching Shortland Street via the TVNZ OnDemand platform.

R Kennedy said the advertisement was disgusting and the attempt to normalise periods had gone too far. They said that as they were watching with a child the advertisement should not have been played before 8:30pm

R Ward said the advertisement was inappropriate and asked what other bodily fluids would be next to be shown on television.

Issues Raised

- Social Responsibility
- Decency and Offensiveness

Summary of the Advertiser’s Response

The Advertiser explained how the advertisement had passed the approval process for OnDemand advertising. It confirmed the advertisement was targeting females who were over 18 and that it would only have been served to profiles which matched the target audience.

The Advertiser also provided the response written for Ad Standards in Australia in relation to complaints it received. This included the history of the creative and the attempt to break the taboos around periods. The Advertiser considers these are partly caused by the mainstream media treatment of the category which has shown unrealistic images of periods such as blue liquid to denote blood.

Summary of the Complaints Board Decision

The Complaints Board did not Uphold the complaints about the Libra Blood Normal advertisement. The Complaints Board said the advertisement had been targeted at females over 18 years of age on the TVNZ OnDemand platform which it considered to be an appropriate audience. The Complaints Board said the advertisement was advocating an important social message by trying to break down the taboo about menstruation and advocate that periods are normal and talking about them should be too.

Relevant ASA Codes of Practice

The Chair directed the Complaints Board to consider the complaint with reference to the following code:

ADVERTISING STANDARDS CODE

Principle 1: Social Responsibility: Advertisements must be prepared and placed with a due sense of social responsibility to consumers and to society.

Rule 1(c): Decency and Offensiveness: Advertisements must not contain anything that is indecent, or exploitative or degrading, or likely to cause harm, or serious or widespread offence, or give rise to hostility, contempt abuse or ridicule.

Relevant precedent decisions

In considering this complaint the Complaints Board referred to two precedent decisions, Decision 12/378 which was ruled No Grounds to proceed and 14/124, which was Not Upheld.

The full versions of these decisions can be found on the ASA website:

<https://www.asa.co.nz/decisions/>

Decision 12/378 concerned a television advertisement for Carefree panty liners which used the words “vagina” and “discharge”. The Chairman said there was nothing pejorative about the anatomically name for a body part, especially taking into account the product being advertised. She acknowledged some people would be uncomfortable about the direct way the subject matter was discussed, she said there was nothing wrong with advertising a feminine hygiene product.

Decision 14124 concerned an advertisement for Carefree tampons featuring a number of young women dealing with their periods in various situations. The advertisement said “Periods happen. We might as well be real about it.”

The Complaints Board said despite Complainants’ saying the advertisement was distasteful, it agreed the situations shown were those that young women were likely to experience and none were salacious or contained anything likely to cause serious or widespread offence to the majority of viewers.

Complaints Board Discussion

Consumer Takeout

The Complaints Board agreed the likely consumer takeout of the advertisement is that menstruation and period products are a normal part of everyday life. The Board said the Advertiser was also advocating for the normalisation of conversations about periods and images of sanitary products.

Does the placement of the advertisement target an appropriate audience?

The Complaints Board noted that the Complainants had viewed the advertisement while watching TVNZ OnDemand. The Board confirmed that advertisements are served through the TVNZ OnDemand platform using the account holder profile information, such as age and gender when scheduling advertisements. The Board noted the Libra Blood Normal advertisement was targeted at user profiles who were female and over 18 years of age. The Complaints Board agreed this was an appropriate audience for the advertisement’s content. The Board also noted the advertisement played during *Shortland Street*, which is a programme which frequently deals with adult issues.

Does the advertisement contain indecent, exploitative or degrading content?

The Complaints Board considered the various images shown in the advertisement and said that scenes such as asking for a sanitary pad in a group setting, dressing up like a sanitary pad and showing a man buying period products were fairly innocuous and were unlikely to offend most viewers.

The Board acknowledged there were parts of the advertisement, such as blood running down the leg in the shower and the pixelated image of a pad being removed from underwear that would be challenging to some viewers. The Complaints Board said these images were directly related to the product being advertised and the advertisement's message about normalising periods. The Complaints Board said there was nothing exploitative or degrading in the advertisement and given the target audience, the advertisement was unlikely to cause serious or widespread offence.

Is the advertisement socially responsible?

The Complaints Board noted the information provided by the Advertiser which said its research showed women and girls feel ashamed of their period and are missing out on everyday activities because they feel they need to hide away. The Advertiser said the advertisement was asking viewers to imagine a world where there is no shame attached to changing your pad in the toilet, asking for a pad at a dinner party or carrying period products without hiding them.

The Complaints Board said it was inevitable some consumers would not be comfortable with the topic, however it was an important social message that it is trying to break down the taboo about menstruation, that periods are normal and seeing pads, tampons and real blood in everyday life are also normal.

The Complaints Board was unanimous in its decision the advertisement was socially responsible, taking into account context, medium, audience and product and was not in breach of Principle 1 or Rule 1(c) of the Advertising Standards Code.

Outcome

The Complaints Board ruled the complaint was **Not Upheld**.

No further action required.

APPEAL INFORMATION

According to the procedures of the Advertising Standards Complaints Board, all decisions are able to be appealed by any party to the complaint. Information on our Appeal process is on our website www.asa.co.nz. Appeals must be made in writing via email or letter within 14 days of receipt of this decision.

APPENDICES

1. Complaint
 2. Response from Advertiser
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Appendix 1

COMPLAINT FROM R KENNEDY

I don't understand this

At 4.10pm Weds 21st August on TVNZ demand TV 1 there was an ad from Libra advertising pads. It was absolutely disgusting. My child was watching TV at the time. I realise they have made a campaign to 'normalise' periods but I believe this has gone too far.

I actually nearly felt sick when I saw blood poured onto a pad. It should be a parents choice when periods are discussed not when Libra decides. I have never made a complaint before. This to me is blood and should be R16. Played after 8.30pm.

COMPLAINT FROM R WARD

Firstly I'm a women and not a shy one at that but I don't like seeing a ad about period blood leaking down some girls leg in the shower or period blood in a pad while I'm eating or not eating my dinner just any time of the day this isn't ok, this is a yuck, inappropriate ad what's next ? semen on ads because that's also normal ?...

Well i hope not but hey if your letting stuff like this be aired then it would not surprise me.

Appendix 2

RESPONSE FROM ADVERTISER, ASALEO CARE LIMITED

We refer to the complaints received made to Advertising Standards Authority (ASA) dated 21 and 27 August 2019 (Complaint reference number Complaint 19/317).

Having considered the complaints and the relevant provisions of the ASA Advertising Codes of Practice (Codes), we submit that the Libra® Blood Normal TV commercial (the TVC) the subject of the complaints complies with the Codes. Accordingly, we submit that the complaints should be dismissed.

Clearance and rating

The approval process in place is via Google (DV360) which is used for programmatic buys for TVNZ OnDemand. The approval process is automated whereby anything determined to violate advertising policies is not approved. If a video asset is rejected, a manual review from the DV360 support team can be requested if we feel the ad is not breaking any rules. If the team come back stating that the ad violates policies, they will say the ad cannot run and they will ask us to use a new creative.

For the Libra Bloodnormal TVNZ OnDemand video asset, this was approved in the system straight away.

This Libra Bloodnormal ad is running across all programming and is not across any specific time slots.

In order to watch shows on TVNZ OnDemand, a user must be logged in. When signing up to TVNZ OnDemand you will be asked your age etc. This is so the video asset can be targeted to specific users (ie. males 18-34 or females 18-54).

The Libra Bloodnormal video is being targeted to Females 18+ for this campaign across TVNZ OnDemand, any younger individuals watching will be co-viewing with their parents.

For the complainant watching TVNZ OnDemand with her child, they were watching something on TV1 which would not have been a kid's show. All kids' shows on TVNZ OnDemand have a strict 'no advertising' policy.

In addition to the above response, please find the full response provided to ASA Australia, which we believe to be relevant for these 2 complaints.

Extract from Response to Ad Standards Australia

The creative idea behind the TVC

In 2017 Libra's sister company¹ Essity launched an award-winning Blood Normal campaign for its Libresse® and Bodyform® pads and tampons, becoming the first ad campaign to depict real period blood instead of the blue liquid that usually stands for it and receiving a number of international accolades, including the Glass Lion for Change at Cannes in 2018.

Essity's campaign was launched following studies conducted by Essity in the UK and Europe which showed that talking about periods and showing periods were considered major taboos² and these taboos were partly caused by mainstream media's typical treatment of the category which showed unrealistic images of women having their period, including using the typical blue liquid to denote blood rather than more realistic red.

The Blood Normal campaign run by Essity encompassed TV and digital platforms in the following global markets:

- UK
- France
- Netherlands
- Norway
- Sweden
- Finland
- Denmark
- Ukraine
- Italy
- Us
- Argentina
- South Africa

Any complaints to regional advertising standards boards have been dismissed, accordingly no part of the campaign has been banned by any country.

The TVC launched by Asaleo Care for Libra®, uses the creative of the Essity campaign, with Libra products.

¹ Essity is the owner of Bodyform® and Libresse® brand of tampons and pads which are sold in Europe and the UK. Essity is a major shareholder of Libra® brand owner, Asaleo Care. Through Asaleo Care's relationship with Essity it leverages global research, product development and manufacturing excellence, including in connection with Asaleo Care's Libra® feminine hygiene products.

² For more information on Bodyform® and Libresse® BloodNormal campaign and survey see <https://www.campaignlive.co.uk/article/blood-new-normal-why-bodyform-libresse-took-marketing-risk-campaign-periods/1447989>, see also <https://www.shots.net/news/view/shifting-the-period-paradigm>

Before deciding whether to launch the Blood Normal campaign in Australia and to what extent it ought to be adapted to meet the Australian market, Libra conducted its own research specific to Australian women, Australian culture and society.

The research consisted of:

1. Consumer quantitative testing and validation of the Advertisement before airing
2. Period Taboo study

Consumer testing and validation of the Advertisement before airing:

Libra® tested the Advertisement with 500 women aged 16-65 years before airing it on television. The research found that the vast majority of women (62%) agree that periods are just a normal part of life, so they shouldn't be ignored by mainstream media (e.g. films, TV). This was even more true of women aged 18-29 years old with 67% of them agreeing with this statement.

Some of the comments by those who viewed the Advertisement in testing:

"Loved how it showed everyday situations and making periods more normal"

"Periods are normal and both women and men shouldn't even bat an eyelid when discussing them! The cleanest blood in the body and for some reason we have been shamed in the past? I loved it!"

"Periods are normal and nothing to be embarrassed about. It's ridiculous that TV censors showing period blood. Workplaces should be more flexible around women working from home if on their period."

"The whole ad was great. Showing how periods are just a normal part of life for half the population that people shouldn't be shamed for it or ashamed to speak freely about it or ask for help if they need to that they don't need to put their life on hold because of a biological condition they were born with."

"It's empowering for all women and a great advertisement that periods shouldn't be a taboo subject."

"I love the music and the fact that it is normalising something so natural for 50% of the population, it's an important message."

"I liked the punchline. I thought it was powerful. I think of all the blood and violence we see on tv and yet we can't show period blood. It made me feel a little sad as well."

"It normalised having your period and showed people not caring or acting like it was gross or something to hide. I liked that it showed blood especially the shower scene."

Period Taboo study

Additionally, in July 2019 Libra commissioned an independent research study with the focus on exploring taboos around periods. This study surveyed 1000 people, men and women from Australia and New Zealand.

Alarmingly, the survey revealed that, in Australia periods are a topic hushed up and hidden at every level of society – on a scale that transcends any other topic.

For instance, Libra's survey and research showed:

- 3 in 4 Australian women say there is a stigma attached to having a period, with periods listed as more of a taboo than drugs, sex, STDs and mental health problems;
- 8 in 10 women will go to great lengths to hide their period, with women avoiding swimming (58%) and light-coloured clothes (60%), hiding products in their pocket,

sleeve or bra (56%) or checking for leaks after sitting down when on their period (58%);

- For young Australians the shame of menstruation is so bad that almost 70% would rather fail a subject at class than have their peers know they are on their period and a further 25% would rather be bullied than have their peers know;
- One quarter of women aged between 18-24 are even embarrassed to purchase female care products.

The results of Libra's survey and research was considered by experts such as Dr Lauren Rosewarne, Senior Lecturer in the School of Social and Political Sciences at the University of Melbourne. Dr Rosewarne provided the following opinion:

"While our society is becoming increasingly open and tolerant around topics such as transgenderism, homosexuality and mental illness, female menstruation is still something that seen as unacceptable for public discourse.

Perhaps that's because periods aren't something we commonly see on television, in movies or on Instagram – if young girls are brought up to hide their period, then they will continue to feel and believe it's something shameful, embarrassing and needing to be hidden."

Based on the Australian research, Libra decided launching the Blood Normal campaign in Australia and New Zealand was the right thing to do as the taboo was real in Australia too. Critically, it was seen as within Libra's brand DNA – bravely playing its part to normalise periods, breaking down the taboos of periods and menstrual blood - generating conversation across mainstream media that periods are part of everyday life and period blood is normal. Put simply, bleeding and having a period are both normal, so seeing them in pop culture and advertising should be too.

By normalising periods and generating conversation in the media and the public around menstruation the intention was to position Libra® as a brand that:

- leads change in Australia's society surrounding menstruation / period taboo
- is on a mission to help Australian women feel better about themselves every day and to tackle period stigma head-on
- is the brand preference for taking care of everyday periods in everyday life in the Australian market

It is also relevant that as the only Australian manufacturer of feminine care products, Libra is committed to and has always played a leading role to help educate and facilitate open and transparent conversations among women and girls to normalise periods and to encourage women to feel empowered about having a period. For example:

- Libra's website includes the 'Ask Gemmah' web-forum where girls are encouraged to ask Gemmah any questions about periods and the website has a series of articles and tools to break down misconceptions, stereotypes and stigmas commonly associated with having periods, period blood and all that goes along with it.
- Libra® positions itself in the market to break down period shame as an Australian societal issue:
 - actively sponsoring charitable organisations such as *Share the Dignity*; and
 - providing free resources to education providers for teaching puberty and menstruation through its 'complete School Resource Kit'.

In addition to the TVC, Libra worked with several local agencies to bring the #bloodnormal message to audiences via paid, owned and earned media. This was done to amplify the message to Australian women, girls and men that periods are normal and seeing pads, tampons and real blood in everyday life is also normal. The TVC is part of the wider Blood Normal campaign. From all trackable responses and commentary to date, we have measured an overwhelmingly positive response to the campaign.

Importantly, part of Libra's survey and research tested the degree to which women want to see change in the way that periods and period blood is portrayed in mainstream media. Almost 50% of women surveyed by Libra confirmed that society's attitude toward periods was old-fashioned and girl's confidence was at risk if periods aren't discussed openly.

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5. Support received for the TVC

Asaleo Care expected that its TVC would not be universally liked. Complaints received align with the results of our research – i.e. many people feel uncomfortable when confronted with the reality of periods, they would prefer to periods, pads and tampons to stay a topic just talked about by women and girls and hidden away from mainstream culture.

Since launching the #BloodNormal campaign Asaleo Care has been overwhelmed by supportive comments it has received across all media from men and women of all ages. Examples of publicly available feedback it is set out below. The purpose of the campaign was for Asaleo Care to play its part in breaking down taboos for periods, pads and tampons. The comments below, show that the campaign has started conversations and will contribute to breaking down the taboo and shame surrounding periods, pads and tampons.

Channel	Feedback from those who viewed the Advertisement
Facebook	<p>"DON'T STOP, NEVER EVER STOP. This message is too important and it's about time we get it loud and clear"</p> <p>"Bloody loved it. The ad was captivating. Not necessary or important for us oldies, but great for younger women struggling to deal with the stigma."</p> <p>"God I feel so reinvigorated by the gutsy honesty."</p> <p>"I have a ten year old daughter and am very happy there's a chance she won't have the same 'period' shame of previous generations."</p>
Instagram	<p>"Finally! We shouldn't be ashamed of what is completely normal"</p> <p>"I just explained the meaning to my daughter. About time – well done!"</p> <p>"I'll be switching from my usual brand to you after seeing this campaign. Thank you"</p> <p>"Great campaign. Started a conversation in our house" -</p>
Twitter	<p>"Can't believe it has taken until 2019 for this. Wish I had seen this ad when I was 12"</p> <p>"Love the ad and much needed breaking down of stigma around PERIOD BLOOD."</p> <p>"Period blood in TV!!! Yes Libra! Well done!"</p> <p>"The shot that hit me was the girl in the shower. That was real, that made me smile. So glad we are normalising periods again... Sad we have to normalise it though. Half the population bleed, I'd say that's pretty normal."</p>

6. Conclusion

We submit this TVC and the #BloodNormal campaign of which it forms a critical element responds to a need to breakdown taboos and shame experienced by women and girls when having their period.

The spectrum of complaints – positive and negative that the TVC has elicited shows it is a topic that does not sit comfortably with all people: some want it to remain hidden whilst others want periods, pads and tampons to be part of everyday life.

The TVC seeks to breakdown stigma and by providing a link to educational materials (including via Ask Gemmah) and the #BloodNormal campaign literature published on our website, provide a place for women and girls (and their husbands, brothers, fathers and sons) to access real information about menstruation, our products and how it can be seen differently ... as a part of everyday real life and does not need to be hidden away.

Note that ASA Australia dismissed this case on Monday 2nd September 2019.

<https://adstandards.com.au/sites/default/files/reports/0262-19.pdf>