



**Ad Standards** Community Panel  
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**AdStandards.com.au**

Ad Standards Limited  
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## Case Report

<b>1. Case Number :</b>	<b>0202-21</b>
<b>2. Advertiser :</b>	<b>Asaleo Care - Libra</b>
<b>3. Product :</b>	<b>Health Products</b>
<b>4. Type of Advertisement/Media :</b>	<b>TV - Free to Air</b>
<b>5. Date of Determination</b>	<b>14-Jul-2021</b>
<b>6. DETERMINATION :</b>	<b>Dismissed</b>

### ISSUES RAISED

AANA Code of Ethics\2.0 Other  
AANA Code of Ethics\2.1 Discrimination or Vilification  
AANA Code of Ethics\2.3 Violence  
AANA Code of Ethics\2.4 Sex/sexuality/nudity

### DESCRIPTION OF ADVERTISEMENT

This television advertisement features a jingle which says "wear, bleed, wash, repeat". Imagery includes:

A woman in underpants (wear)  
A woman holding a hot water bottle (bleed)  
A washing machine and person removing underpants from machine (wash, repeat)  
A woman in underpants (wear)  
A woman doing yoga (bleed)  
A person wringing out underpants (wash)  
A person holding up clean underpants (repeat)  
A woman pulling up jeans (wear)  
Feet sticking out from under a doona (bleed)  
Underpants on a clothesline (wash)  
A person pulling the underpants off the clothesline (repeat)

### THE COMPLAINT

A sample of comments which the complainant/s made regarding this advertisement included the following:

*I object to this advertisement for two reasons:*



- 1. Bleed may be normal, however it is associated with pain. Whilst sitting eating dinner watching the Channel 9 news i do not think it is appropriate the word 'bleed' along with other words are blasted across my television screen*
- 2. My 9 year old daughter should not be subject to seeing such content during this hour. It's highly confusing and confronting to children of that age.*

*The ad showed a woman wringing blood out of her underwear. It also discussed bleeding- the slogan was wear bleed wash repeat. Toilet paper ads don't discuss poo (or show poo). This is unnecessary, offensive and distasteful.*

*I don't have a problem with the product but with the way it is being advertised. The slogan is - Wear BLEED Wash. They even show redness being wrung out of the underwear I find this advertisement as offensive, crude and Very DISRESPECTFUL to women.*

*Brings up conversations I'm not ready for with my small children regarding periods and blood on underwear*

#### **THE ADVERTISER'S RESPONSE**

Comments which the advertiser made in response to the complainant/s regarding this advertisement include the following:

*We refer to the complaints received made to Advertising Standards Authority (ASA) - case reference number 0202-21.*

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

*Many of the complaints made to ASA do not specifically reference a section or part of the Codes which the TVC allegedly breaches. However, ASA has referred us to the following issues / potential breaches of Codes raised by the complaints:*

- AANA Code of Ethics / 2.0 / Social Values*
- AANA Code of Ethics / 2.1 / Discrimination or Vilification*
- AANA Code of Ethics / 2.2/ Exploitative or degrading*
- AANA Code of Ethics / 2.3 / Violence*
- AANA Code of Ethics / 2.4 / Sex / sexuality / nudity*
- AANA Code of Ethics / 2.5 / Language*



- *AANA Code of Ethics / 2.6 / Health and Safety*
- *AANA Code of Ethics / 2.7 / Distinguishable as advertising*

*It also appears the complaints fall into the following broad categories, many of which do not necessarily fall within the scope of the Codes, but are nevertheless claims that Libra denies:*

- *Advertisement is generally embarrassing*
- *Advertisement was offensive*
- *Children are too young for parents to explain the product and periods*
- *Too graphic and unnecessary exposure of menstrual blood*
- *Menstrual blood itself is offensive*

*For your reference we have detailed below under separate headings, details of the TVC's creative team and the creative idea behind the TVC, the clearance given to the TVC and reasons for our submission that the TVC complies with the Codes – addressing the elements of the code listed above.*

#### *1. The creative idea behind the TVC*

*Libra launched on the 20th June a new integrated campaign 'The New Period Ritual: Wear, Bleed, Wash, Repeat' created to educate women on the ease of use when it comes to period underwear.*

*Libra has always had a broad product range that supports women to period their way, so it's great to be extending the range and giving Libra's loyal customers even more choice to period their way – whether that is using disposables, reusables, or a combination.*

*Perfecting the Libra period underwear took some time, and during this time consumer usage testing was conducted with 250 Australian women which showed two in three women are interested in trying period underwear, however identified the following barriers holding women back from using:*

- *Ease of use*
- *Comfort and fit*
- *Absorbency and the fear of leakage*
- *How to wash and care for period underwear*

*The 'The New Period Ritual: Wear, Bleed, Wash, Repeat' seeks to break down the mental barriers and anxieties around period underwear in a fun and empowering way.*



*Central to breaking down the stigma and fears that women have around the product is a song that highlights the easy four-step process of using period underwear.*

*The campaign highlights the easy four-step process that all you need to do is wear, bleed, wash and repeat via several relatable scenes that a woman is likely to experience on her period.*

## *2. Libra's 2019 Bloodnormal campaign, complaints dismissal and ongoing strategy*

*In 2019 Libra's Blood Normal campaign became the first ad campaign to depict real period blood instead of the blue liquid that usually appeared in feminine hygiene ad campaigns.*

*The campaign was launched following studies conducted by Asaleo Care in Australia and New Zealand which showed that talking about periods and showing periods were considered major taboos 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.*

*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.*

*The Blood Normal TVC received over 700 complaints in 2019, I refer you to Bloodnormal ASA Final Case Report 0262-19 03-Sep-2019 where all complaints were dismissed. An exert from the final report below:*

*"The Panel considered that the depiction of blood in the context of an advertisement for feminine hygiene products is not against prevailing community standards on health. The Panel noted that the depiction is an accurate presentation of a real physical occurrence.*

*The Panel noted that although some members of the community would prefer not to see bodily fluids displayed on television, it was not a depiction which could be found to breach the Code and its*

*depiction in an advertisement which would be viewed by a broad audience including children is not inappropriate.*

*The Panel determined that the advertisement did not breach Section 2.6 of the Code. Finding that the advertisement did not breach the Code on other grounds, the Panel dismissed the complaints."*



*Libra's rationale to have the current complaints dismissed by ASA is in line with our previous rationale provided in relation to the Blood Normal case.*

*Libra's strategy to break down the stigmas and taboos surrounding periods has not wavered. Critically, it is part of 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 is to continue 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; and*
- 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.*

#### *4. Compliance with the Code*

*The following issues have been raised by complainants in connection with the TVC, each of which is dealt with in detail below:*

- AANA Code of Ethics / 2.0 / Social Values*
- AANA Code of Ethics / 2.1 / Discrimination or Vilification / Gender*
- AANA Code of Ethics / 2.3 / Violence / Violence*
- AANA Code of Ethics / 2.4 Sex / sexuality / nudity / sexualisation of children*

#### *2.4 – Sex, sexuality, nudity, sexualisation of children*

*The Code states:*

*Advertising or Marketing Communications shall treat sex, sexuality and nudity with sensitivity to the relevant audience.*

*A small number of the complaints allege (which we deny) that the portrayal in the TVC of the women wringing out the underwear, depicting blood is:*

*“not appropriate for peak view period with small children” and / or “brings up conversations I’m not ready for with my small children regarding periods or blood on underwear”*



*Although the complainants have not directly quoted that these aspects of the TVC breach section 2.4 of the Code, ASA has requested that we address this as a possible issue.*

*We submit that the TVC complies with Section 2.4 of the Code and the accompanying guidance set out in the Practice Note. The images of the women in the TVC are at all times tasteful and sensitive to the relevant audience, consumers of the products and the underlying message of the TVC: that is: using period underwear is as simple as 4 easy steps, wear, bleed, wash, repeat.*

*The TVC was broadcast as per the rating guidelines for 'P' rated advertisements. Although this was not a Clear Ads requirement of the approval, the placements were booked from 6.00pm onwards. The TVC was not broadcast during programs intended specifically for children under the age of 13. If children were watching the programs, it is likely they were watching with their parents who can provide their children with the appropriate guidance about menstruation, pads and tampons.*

*The scenes in the TVC are of women doing everyday things while on their period and shows the reality of having a period – normalising a period as part of everyday normal life for women and girls. Menstruation is part of women and girls experience and is part of puberty for girls, but menstruation should not be equated with sexualisation – the TVC does not make having a period sexual it makes it normal.*

*There is no scene in the TVC which shows nudity.*

*We are also able to confirm that all talent were over 18 years of age at the time of filming. Due to privacy laws we cannot disclose any of their personal details.*

*2.1 Discrimination or vilification of gender/ 2.2 Exploitative or degrading / 2.5 Language*

*The Code states:*

*Advertising or Marketing Communications shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.*

*Some of the complaints allege, which we deny that the TVC is degrading to women and girls. For example, one complainant stated "I believe explicitly showing the aftermath of a period in such a fashion is repugnant." and another complainant said "I find this advertisement as offensive, crude and Very DISRESPECTFUL to women."*



*From our review of the complaints received, complainants have not directly quoted that the TVC breaches section 2.1 of the Code or if it does, any specific scenes which are in breach. However, ASA has requested that we address this as a possible issue.*

*We submit that the TVC complies with Section 2.1 of the Code. There is no scene which is discriminatory, or which is degrading or vilifies women or any person on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief. Further, Section 2.1 of the Code is not relevant as children are not depicted, nor is there any exploitative or degrading depiction of women. Lastly, the language used is sensible, ordinary and in no way obscene.*

*As mentioned earlier, the intention of the TVC is to breakdown taboos and the stigma and fears that women have with period underwear. To show the product as part of women and girl's everyday life. The need for the TVC is supported by research which showed that women have questions and concerns about the ease of use of period underwear. The TVC is encouraging women, to try period underwear that it is easy to use and that there is no shame attached to having your period.*

*2.0 general community standards / social values / 2.3 violence / graphic depictions/  
2.6 Health and safety*

*The Code states:*

*Advertising or Marketing Communications shall not depict material contrary to  
Prevailing  
Community Standards on health and safety.*

*Advertising or Marketing Communication shall not present or portray violence unless it  
is justifiable in the context of the product or service advertised.*

*Advertising must not depict content that would encourage or condone unhealthy or  
unsafe behaviour having regard to Prevailing Community Standards.*

*Many complaints have stated that the showing of period blood and using the word  
bleed in the TVC is of itself offensive. From our review of the complaints made this is  
the most common ground for complaint. Examples of comments made by  
complainants are listed below:*

*"I believe explicitly showing the aftermath of a period in such a fashion is repugnant"*

*"Whilst sitting eating dinner watching the Channel 9 news i do not think it is  
appropriate the word 'bleed' along with other words are blasted across my television  
screen."*

*"I don't believe we need to be subjected to seeing women and blood on their pads  
during their period. It is highly offensive. It's such a personal things and some things  
need to be kept private."*





*We submit that the TVC complies with sections 2.0, 2.3 and 2.6 of the Code. There is nothing in the Code which prohibits the showing of period blood. There is nothing in the TVC which links the showing of period blood to any act of violence, or unhealthy and unsafe behaviour. The blood shown in the TVC is clearly intended to be period blood, it is not as a consequence of any violent act.*

*As mentioned above, the TVC premise to show blood is based on research conducted in Australia (and globally) on the feminine hygiene category which all pointed to an entrenched sense of shame surrounding periods that exhibited itself in the many strategies women use to hide their period and resulted in some disturbing figures around the way Australian women and girls feel about their periods.*

*As the only Australian manufacturer of feminine care products, Libra has played a leading role in helping to destigmatise menstruation for over forty years. Libra wants to play its part to shift the paradigm, to change how periods are represented in mainstream media advertisements. A key part of this change was the typical blue liquid used to denote blood is replaced with a more realistic red to demonstrate a the colour of the liquid when a pair of period underwear is rinsed and wringed out, crucially, blood is depicted on women's period underwear.*

*But, the TVC is not just about showing period blood, it is about educating women and girls how to use a new product, period underwear. This product is relatively new to the mainstream market and requires education around ease of use.*

*The TVC comprises multiple scenes which are deliberate, carefully and sensitively constructed to address everyday activities that women and girls go through whilst on their period and showcases how to easily incorporate period underwear into their everyday routine. So, the TVC does two things:*

*(1) it shows periods like they are, normal, boring, sometimes emotional, painful or awkward and sometime not; and*

*(2) shows women without shame dancing, women without shame doing yoga, women without shame washing their period underwear.*

*Period blood should not be likened to poo or urine. Period blood is part of everyday life for women and girls. There is not the same stigma attached to poo or urine. That is part of the message we are making.*

*We submit that the period blood shown in the TVC has a context and is normalised and sensitive to the audience and our consumers. For Libra the showing of period blood is key to demonstrating the brand's commitment to breaking down taboos and starting a meaningful conversation about periods, pads and tampons in our community which will help women and girls normalise their experiences and get on*





*with everyday life when having their period, it will also help men and boys understand that periods are a normal and healthy part of life.*

## **5. Conclusion**

*We submit this TVC and the ‘The New Period Ritual: Wear, Bleed, Wash, Repeat’ campaign of which it forms a critical element responds to a need to educate consumers on the ease of use with period underwear whilst continuing to simultaneously breaking down 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, period underwear to be part of everyday life.*

*The airing of the TVC was during Network 7, 9 and 10 primetime programs such as The Project, Ninja Warriors, MasterChef Australia and Big Brother. The TVC was appropriately CAB / CAD cleared as suitable for this audience.*

*For all the reasons set out above, we submit that the TVC complies in all respects with the provisions of the Code and we ask ASA to dismiss the complaints it has received.*

## **THE DETERMINATION**

The Ad Standards Community Panel (the “Panel”) considered whether this advertisement breaches Section 2 of the AANA Code of Ethics (the “Code”).

The Panel noted the complainants’ concerns that the advertisement:

- That showing blood in underwear is offensive and distasteful
- That the advertisement is disrespectful to women
- That bleeding is associated with pain, and is not appropriate for television
- That the issue of menstration is not appropriate for a medium where children may see it

The Panel viewed the advertisement and noted the advertiser’s response.

### **Concerns that do not raise an issue under the Code of Ethics**

The Panel noted complainants’ concerns that the advertisement’s subject matter and visuals are distasteful and not appropriate for a television advertisement. Specifically the Panel noted concerns that advertising in a manner which depicts blood is distasteful. The Panel noted that advertisers are free to use whatever images and phrases they wish in an advertisement provided that such images or phrases do not breach any section of the Code. The Panel considered that some aspects of the imagery in the advertisement may be off-putting and noted that some complainants were upset that the advertisement had aired during family viewing times. Overall however, the Panel noted that the issue of taste falls outside of the Code therefore



the Panel is unable to consider this aspect of the complaints when making its determination.

**Section 2.1: Advertising or Marketing Communication shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.**

The Panel noted the AANA Practice Note which provides guidance on the meaning of:

- Discrimination - unfair or less favourable treatment
- Vilification - humiliates, intimidates, incites hatred, contempt or ridicule
- Gender – refer to the attributes, roles, behaviours, activities, opportunities or restrictions that society considers appropriate for girls or boys, women or men. Gender is distinct from ‘sex’, which refers to biological difference.

The Panel noted the complainants’ concerns that the advertisement is disrespectful to women.

The Panel considered that the complainants’ overall concerns appeared to relate to the topic of menstruation being raised at all, and that such a reference to a matter which some women wish to remain private is offensive.

The Panel considered that of itself, the topic of menstruation is not discriminatory or vilifying even though some members of the community would prefer not to have this type of issue discussed publicly.

The Panel considered that the women in the advertisement are depicted in realistic scenarios. The Panel noted that one woman is shown rinsing her bloodied underpants, while another is shown holding a hot water bottle to her stomach. The Panel considered that there is no negative language or imagery in the advertisement that implies that that woman, or women in general, should be embarrassed about menstruation or that a woman who is menstruating is a lesser person.

The Panel considered that the advertisement does not depict the women in the advertisement or women in general in a manner that is unfair nor in a manner that would be likely to humiliate or incite ridicule.

## **2.1 Conclusion**

The Panel determined that the advertisement does not discriminate against or vilify a person or section of the community on account of gender and did not breach Section 2.1 of the Code.

**Section 2.3: Advertising or Marketing Communications shall not present or portray violence unless it is justifiable in the context of the product or service advertised.**



The Panel then noted complainants' concerns that the depiction and mention of blood in the advertisement is disturbing and a reference to pain.

The Panel noted that there are no violent scenes in the advertisement, and considered that the amount of blood depicted in the advertisement is not excessive or disproportionate. The Panel considered that the depiction of blood in the context of the advertisement for feminine hygiene products, while not often shown when advertising this type of product, is justifiable in the context of an advertisement for feminine hygiene products.

### **2.3 Conclusion**

The Panel considered that the advertisement did not breach Section 2.3 of the Code.

### **Section 2.4: Advertising or Marketing Communications shall treat sex, sexuality and nudity with sensitivity to the relevant audience.**

The Panel considered whether the advertisement contained sex, sexuality or nudity.

The Panel noted the Practice Note for the Code states:

“Images which are not permitted are those which are highly sexually suggestive and inappropriate for the relevant audience. Explicit sexual depictions in marcomms, particularly where the depiction is not relevant to the product or service being advertised, are generally objectionable to the community and will offend Prevailing Community Standards.”

#### **Does the advertisement contain sex?**

The Panel considered whether the advertisement contained sex. The Panel noted the definition of sex in the Practice Note is “sexual intercourse; person or persons engaged in sexually stimulating behaviour”.

The Panel considered that the depiction of the women in the advertisement did not contain sex.

#### **Does the advertisement contain sexuality?**

The Panel noted the definition of sexuality in the Practice Note is “the capacity to experience and express sexual desire; the recognition or emphasis of sexual matters”.

The Panel considered that the advertisement contained depictions of sexuality as menstruation is directly related to matters such as sexual maturity and reproduction.

#### **Does the advertisement contain nudity?**



The Panel noted that the definition of nudity in the Practice Note is “the depiction of a person without clothing or covering; partial or suggested nudity may also be considered nudity”.

The Panel considered that the women in the advertisement are portrayed in the advertised product. The Panel considered that some members of the community may consider a person in underwear to be a depiction of partial nudity.

### **Are the issues of sexuality and nudity treated with sensitivity to the relevant audience?**

The Panel noted that the definition of sensitivity in the Practice Note is “understanding and awareness to the needs and emotions of others”.

The Panel considered that the requirement to consider whether sexual suggestion is ‘sensitive to the relevant audience’ requires them to consider who the relevant audience is and to have an understanding of how they might react to or feel about the advertisement.

The Panel noted complaints that the advertisement was aired at a time that was inappropriate for the broad audience. The Panel considered complaints’ concern that the topic was inappropriate for young children.

The Panel considered that the topic of menstruation is a personal matter for many women, and considered that airing the advertisement during family viewing time when women may be with their partners, children or parents, may cause embarrassment and emotional distress.

The Panel noted that some complainants considered that their children were too young to view the advertisement. The Panel noted that the average age for a girl to begin menstruation is 12, but that studies show that that age is reducing and that some girls start menstruation as young as 8.

The Panel considered that the advertisement is broadcast during family viewing times and it is unlikely that children will see the advertisement on their own. The Panel noted information on the website <https://www.betterhealth.vic.gov.au>, for example, that many children have questions about sexual reproduction during primary school, and considered that this advertisement may provide an appropriate conversation starter for children who are watching with their parents.

The Panel considered that although the topic of menstruation or an implied message about sexuality may make some members of the community uncomfortable, the advertisement depicted material in a manner that is sensitive to the relevant broad audience which would likely include children.

### **Section 2.4 Conclusion**



The Panel determined the advertisement did treat sex, sexuality and nudity with sensitivity to the relevant audience and did not breach Section 2.4 of the Code.

**Conclusion**

Finding that the advertisement did not breach any other section of the Code, the Panel dismissed the complaints.