



## Case Report

1	Case Number	0284/12
2	Advertiser	Bosch
3	Product	House goods/services
4	Type of Advertisement / media	TV
5	Date of Determination	25/07/2012
6	DETERMINATION	Dismissed

### ISSUES RAISED

1 - Truthful and Factual      1)i misleading or deceptive

### DESCRIPTION OF THE ADVERTISEMENT

The Advertisement is for Bosch's ActiveWater Dishwasher. The Advertisement features a comparison between the energy and water usage of hand washing as compared to the Product. The advertisement makes two claims in relation to energy and water usage.

1. hand washing uses nearly 8,000 litres more than the Product over a period of 1 year; and
2. every dishwasher in the Product range can save hundreds of dollars in utility bills by using up to 60% less energy than hand washing.

### THE COMPLAINT

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

*I find this ad objectionable on a number of counts. Firstly it suggests that the householder will save 8 000 litres a year of water if they replace hand washing dishes with the Bosch dishwasher. I fail to see how they can make this claim. This would depend on how the householder washes dishes by hand. If they wash under continuously running water this claim MAY be correct however if they wash once a day in a basin of water (as most who use this method do) it is a patently nonsensical claim. Secondly the ad also claims at the end that the householder will save energy by using the Bosch dishwasher as compared to hand washing. I cannot imagine any circumstances under which this claim can be defended. Hand washing dishes uses no energy other than that used to heat the water (which the dishwasher must also use) but the dishwasher on top of this uses electricity to run its motor. This is*

*patent nonsense designed to tempt buyers into thinking they are doing a good thing by the environment by buying a Bosch dishwasher and giving up hand dishwashing. As a committed environmentalist who chooses hand washing for this very reason I find the suggestion that any electronic machine which patently must use more energy and water than a careful hand washer insulting to my intelligence but worse misleading to the general public.*

## **THE ADVERTISER'S RESPONSE**

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

*I refer to your letter regarding a complaint received from a member of the public concerning Reckitt Benckiser (Australia) Pty Limited's (Reckitt Benckiser's) Bosch ActiveWater Dishwasher (Advertisement). Thank you for the opportunity to comment on the issues raised in the complaint.*

### *Background*

*The Advertisement is for Bosch's ActiveWater Dishwasher (the Product). The Advertisement features a comparison between the energy and water usage of hand washing as compared to the Product. The advertisement makes two claims in relation to energy and water usage (hereafter Claim 1 and Claim 2);*

- 1. hand washing uses nearly 8,000 litres more than the Product over a period of 1 year; and*
- 2. every dishwasher in the Product range can save hundreds of dollars in utility bills by using up to 60% less energy than hand washing.*

### *Complaint*

*The complaint takes issue with each of Claim 1 and Claim 2 on the basis that they are misleading and deceptive.*

### *Submission*

*Your letter states that the complaint raises issues under section 2 of the AANA Advertiser Code of Ethics (Code of Ethics). We have reviewed the entirety of section 2 of the Code of Ethics and can find no provision of section 2 which has any potential application to the issues raised in the complaint. On this basis alone, the complaint should be dismissed.*

*Notwithstanding the absence of any ground for the ASB to review the complaint under section 2 of the Code of Ethics, Reckitt Benckiser has considered the entirety of the Code of Ethics and in particular its obligations under sections 1.2 and 1.4 of the Code. Given the nature of the claims, Reckitt Benckiser has also considered its obligations under the Environmental Claims in Advertising and Marketing Code (Environmental Code)*

*As with all our advertising, accuracy is very important to us and Reckitt Benckiser takes complaints about the accuracy of claims made in our advertising very seriously. All information in the Advertisement is true and accurate and is therefore not in breach of either of the Code of Ethics or the Environmental Code. Reckitt Benckiser submits that it complies in all respects with the letter and spirit of each of the Code of Ethics and Environmental Code.*

*Each of Claim 1 and 2 has been independently validated through research conducted by Colmar Brunton 2009 (Colmar Brunton Study). A copy of the Colmar Brunton Study has been annexed for your reference. The Colmar Brunton Study built on a previous study conducted in 2004 at Bonn University in Germany, which validated benefits and claims in the European market.*

*Claim 1: hand washing uses nearly 8,000 litres more than a dishwasher over a period of 1 year*

*The Colmar Brunton study validated Claim 1 on the following basis:*

*On average, it took 75.11L of water to hand-wash a 12 place dinner setting (132 individually soiled pieces). By comparison, the Products use 13.6L to wash the same 12 place dinner setting, equating to a saving of 61.51L per wash. Nielsen Home Scan data for 19/3/2011 demonstrates that the average household conducts 2.54 washes per week. Multiplying the 61.51L saving per wash by the number of washes per week results in the figure of 8124 L per year upon which Claim 1 is based.*

*This claim is fully supported and therefore this aspect of the complaint should be dismissed.*

*Claim 2: every dishwasher in the Product range can save hundreds of dollars in utility bills by using up to 60% less energy than hand washing*

*The Colmar Brunton Study validated Claim 2 as follows.*

*The measure of the energy saved was calculated by comparing the average hot water volume used to hand wash a 12 place dinner setting compared the average energy used by the Products to wash the same 12 place dinner setting.*

*To determine the energy used by hand washing, the average hot water volume used in hand washing (53.20L) was multiplied by the average increase in water temperature (35.77 Degrees C) and again multiplied by water heat capacity (4.18). This figure was then divided by 3600 to achieve the Kilowatt output figure.*

*Using this methodology, Colmar Brunton Study demonstrated that the average energy use required to clean a 12 place setting using hand washing was 2.21kWh.*

*The Energy Consumption figures for the Products were taken from the results achieved through performance tests conducted to the following Australian Standards:*

- 1. AS/NZS 2007.1:2005 Performance of household electrical appliances – Dishwasher, Part 1; Energy Consumption and Performance*
- 2. AS/NZS 2007.2:2005 Performance of household electrical appliances – Dishwasher, Part 2; Energy labelling requirements*
- 3. AS/NZS 6400:2005 Water efficient products – Rating and labelling*
- 4. AS/NZS 62301:2005 Household electrical appliances – Measurement of standby power (IEC 62301, Ed. 1.0 (2005) MOD)*

*These tests demonstrate that the average Product uses 0.62kWh to clean a 12 place setting. A copy of the test results verifying this figure has been attached. Comparing the two results, we see an energy saving achieved through use of the average 4 star Bosch dishwasher of 1.59kWh (or a 72% energy saving). To estimate energy savings in monetary terms over a period of a year, the energy savings per use (1.59kWh) are multiplied by the average number of washes per week (2.54) over a year to reach the figure of 210kWh. Taking the life of a dishwasher to be 10 years, this equates to an energy saving of 2,100kWh.*

*The current published rate for Sydney, Brisbane and Melbourne for the 3 large energy providers (AGL, Origin and TRUenergy) is between 21.945 and 26.84 c/kWh. Multiplying this by 2,100kWh demonstrates a savings figure of between \$460.95 and \$563.66.*

*This claim is fully supported and therefore this aspect of the complaint should also be dismissed.*

*In light of the above, we strongly urge the Board to dismiss the complaint in its entirety. We look forward to receiving the Board's determination in due course.*

## **THE DETERMINATION**

The Advertising Standards Board (“Board”) considered whether this advertisement breaches the AANA Environmental Claims in Advertising and Marketing Code (the Environment Code).

The Board noted the complainant’s concerns that the advertisement is misleading in its claims that dishwashers will save you on water usage and energy bills compared to hand washing dishes.

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

The Board noted that the Environment Code applies to 'environmental claims' which are defined as 'any representation that indicates or suggests an Environmental Aspect of a product or service, a component or packaging of, or a quality relating to, a product or service.'

An Environmental Aspect means ‘the element of a product, a component or packaging or service that interacts with or influences (or has the capacity to interact with or influence) the Environment.'

The Board noted that the advertisement features a voiceover describing how a Bosch dishwasher can save up to 8,000 litres of water and use up to 60% less energy than hand washing.

The Board considered Section 1 (i) of the Environmental Code which provides that:

‘Environmental Claims in Advertising or Marketing Communications shall not be misleading or deceptive or be likely to mislead or deceive.’

The Board noted the advertiser’s response that the claims made in the advertisement regarding water usage and energy have been validated by independent research. The Board further noted the study data which outlined the comparison of washing a 12 place dinner setting in the dishwasher as compared to washing the same 12 place setting by hand, was the basis for the claims made in the advertisement.

The Board considered that most members of the community would recognise that the use of the terms “up to” “general” “average” and “usual” in conjunction with water and energy usage are suggestive of the average household and that the advertisement is presenting comparative information in a manner which is not misleading or deceptive.

Based on the above the Board determined that the advertisement did not breach Section 1(i) of the Environment Code.

Finding that the advertisement did not breach the Environment Code on other grounds, the Board dismissed the complaint.

