Case Report

Case number: 0100-26
Advertiser: Essity Australasia Pty Ltd
Medium: TV - Free to Air
Decision date: 29-Apr-2026
Decision: No breach

ISSUES CONSIDERED BY THE COMMUNITY PANEL

- AANA Code of Ethics - 2.1 Discrimination or Vilification - no breach
- AANA Code of Ethics - 2.2 Exploitative or Degrading - no breach
- AANA Code of Ethics - 2.4 Sex/sexuality/nudity - no breach

AD DESCRIPTION

This television ad promotes the advertiser's bladder leak pantyliners. It features visuals of various women, some of whom are in their underwear, with the pantyliner being visible, others are engaging in activities like horse-riding or martial arts. One scene shows a woman inserting the pantyliner into her underwear. During these scenes, the voiceover states 'We're told bladder leaks mean a sign of decline. Something to fear. That they mean shame. A weakness. It's time to rethink bladder leaks.' The closing shot features three packs of the advertised product, and the phrase 'RETHINK YOUR PROTECTION' on-screen.

SUMMARY

Complaints

Complaints were received on the grounds that this ad featured intimate visuals of women in underwear, placing liners into their underwear, or generally posing without clothing. The complainants argued that the images were too graphic, crossed personal privacy boundaries, and disrespected women on a medium that is typically watched by families. Some complainants argued that there are no ads that disrespect men in such a manner.

Advertiser response

The advertiser responded that the ad was made to reduce shame about bladder leaks and show that it is a common health issue for many women. It explained that the scenes showing underwear and the liner were practical and instructional, not sexual, and similar to other health or clothing ads. The ad treated women respectfully and aimed to build confidence rather than embarrass or degrade anyone. The women are depicted as empowered and confident. The advertiser also elaborated on the research on which it relied when creating this campaign.

A copy of the advertiser's full response is included as Appendix A.

Decisions

The Panel found that the ad did not breach section 2.1 of the AANA Code of Ethics, as the ad did not depict discriminatory content.

The Panel also found that the ad did not breach section 2.2 of the AANA Code of Ethics, as the ad did not employ sexual appeal in a manner that was exploitative or degrading.

Finally, the Panel found that the ad did not breach section 2.4 of the AANA Code, as the ad did not depict sex, sexuality or nudity that warranted special consideration.

ASSESSMENT AND DECISIONS

Section 2.1 (AANA Code of Ethics): 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, or political belief.

The Practice Note defines discrimination and vilification as:

> **Discrimination:** unfair or less favourable treatment
>
> **Vilification:** Humiliates, intimidates, incites hatred, contempt or ridicule

Panel assessment

The Panel considered that bladder leakage was a real and common health issue. The Panel acknowledged that there would be members of the community that would feel uncomfortable about the topic, and might not wish to discuss it. However, the Panel considered that discomfort does not necessarily amount to discrimination or vilification as defined in the Code. The Panel also noted that men suffer from this condition. However, the Panel considered the statistics provided by the advertiser which show that women are more likely to experience this condition, and less likely to speak about it or seek assistance. In this context, the Panel considered that the advertiser's decision to position this product to women could not be considered discriminatory.

The Panel considered that the ad depicts empowered women who acknowledge the problem, and thrive despite it. The Panel considered that the ad featured nothing that denigrates or vilifies women, and does not subject women to unfair or less favourable treatment.

Panel decision

On this basis, the Panel found that the ad did not breach section 2.1 of the AANA Code of Ethics.

Section 2.2 (AANA Code of Ethics): Advertising or Marketing Communications shall not employ sexual appeal in a manner which is exploitative or degrading of any individual or group of people.

The Practice Note defines 'exploitative' and 'degrading' as:

> **Exploitative:** (a) taking advantage of the sexual appeal of a person, or group of people, by depicting them as objects or commodities; or(b) focusing on their body parts where this bears no direct relevance to the product or service being advertised.
>
> **Degrading:** Lowering in character or quality a person or group of persons. Treating humans as sexual objects or commodities for sale perpetuates the harmful view that people, particularly women and girls, are evaluated based on their appearance and risks the premature sexualization of children.

It also notes that 'For material to breach this section of the Code, it must contain sexual appeal.'

Panel assessment

The Panel considered that the content and imagery was not sexual. The Panel considered that the topic of bladder leaks would not likely be perceived as a suggestion that the ad contained sexual appeal. The Panel also considered that none of the women are posing or commenting in a manner that suggests that they are expressing their sexuality or projecting their sexual appeal. The focus is on strength and empowerment, but not through sexual appeal.

The Panel accepted that the ad focussed on intimate parts of the female anatomy, but considered that this was not done in an exploitative or degrading manner and that viewer discomfort would likely stem from personal discomfort with the subject, and not because the ad was perceived as exploitative or degrading of the sexual appeal of women.

The Panel, therefore, considered that the ad did not contain sexual appeal, and could not be considered to employ sexual appeal in a manner that is exploitative or degrading.

Panel decision

On this basis, the Panel found that the ad did not breach section 2.2 of the AANA Code of Ethics.

Section 2.4 (AANA Code of Ethics): Advertising shall treat sex, sexuality and nudity with sensitivity to the relevant audience.

The Practice Note defines 'sex', 'sexuality' and 'nudity' as follows:

> **Sex:** Sexual intercourse; person or persons engaged in sexually stimulating behaviour.

Sexuality: The capacity to experience and express sexual desire; the recognition or emphasis of sexual matters.

Nudity: The depiction of a person without clothing or covering; partial or suggested nudity may also be considered nudity.

Panel assessment

The Panel considered the ad did not depict anyone engaged in sex, or expressing sexual desire or a recognition of sexual matter. As such, the Panel found that the ad featured no sex or sexuality.

While the Panel acknowledged that the ad featured some women who appeared to be wearing their underwear, which might be considered partial nudity, it did not consider this to fall within the realm of problematic, or gratuitous nudity that the Code seeks to prevent. The Panel noted that these scenes were typically used to show where the product is placed and how to position it, and was done in a factual, product-relevant manner.

The Panel also considered that the overall tone and communication of the ad was one of empowering women, presenting information in a 'matter-of-fact' way, and dragging an uncomfortable subject matter out into the open to encourage conversations around it. The Panel noted that the advertising codes do not prevent advertisers from addressing uncomfortable issues, provided that they do so without breaching the relevant sections of each code. The Panel considered that the advertiser's approach in this matter was appropriately sensitive, and did not expose viewers to excessive, gratuitous, or irrelevant material.

As such, the Panel considered that the ad treated issues around nudity with appropriate sensitivity to the relevant audience.

Panel decision

On this basis, the Panel found that the ad did not breach section 2.2 of the AANA Code of Ethics.

OTHER CONSIDERATIONS

The Panel found that the ad did not breach any other section of the relevant advertising codes.

APPENDIX A: ADVERTISER RESPONSE IN FULL

RE: Case Reference Number 0100-26 (Advertiser: Essity - TENA)

Essity Australia refers to the complaints made to Advertising Standards Authority (ASA) in relation to the TENA "Rethink Bladder Leaks" TV commercial dated 10, 13 April 2026 (case reference number 0100-26).

Having considered the complaints and the relevant provisions of the ASA Advertising Codes of Practice (Codes), we submit that the TENA Rethink Bladder Leaks TV commercial (the Advertisement) 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\2.4 Sex/sexuality/nudity\S/S/N - general
- AANA Code of Ethics\2.2 Exploitative or Degrading\Degrading – women
- AANA Code of Ethics\2.1 Discrimination or Vilification\Gender

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 TENA denies:

- Advertisement was offensive
- Advertisement is degrading to women
- Advertisement shows nudity and graphic scenes

For your reference we have detailed below under separate headings, details of the Advertisement consumer insights, Description of the Advertisement, the clearance given to the Advertisement and reasons for our submission that the advertisement complies with the Codes – addressing the elements of the code listed above.

Consumer insight surrounding incontinence & stigma/taboo

Essity has conducted extensive global and Australian research which determines that bladder leaks remain one of the most stigmatised and misunderstood female health issues.

- 1 in 3 people in Australia over 15 years old experience incontinence. That's more than 7.2 million people*

- Almost 4 in 10 women and 2 in 10 men in Australia experience incontinence. Women are 2 times more likely to have incontinence than men*

- 75% of women felt the need to stay silent about their bladder leaks because of societal shame**

- 79.4% agree with the statement "The societal stigma and shame around experiencing bladder leaks influenced my willingness to seek help (buying products or speaking to others about it)**

- 59.4% use products other than those designed specifically for incontinence (i.e. period pads, toilet paper) for your bladder leaks because of feelings of embarrassment or shame***

*Continence Health Australia
**TENA Quantitative Research Australia: Women Experiencing Incontinence (25-64) Oct – Nov 2024 - Focal data
*** Usage & Attitude Study Australia Consumer May 2022 - FiftyFive5

This stigma has measurable impacts on women's:
- Confidence
- Health outcomes
- Participation in sport, work, relationships and social life

The campaign was therefore intentionally designed to challenge cultural misconceptions, not to shock or offend.

Description of the Advertisement

The Advertisement is part of TENA's 2025–2026 "Rethink Bladder Leaks" campaign, which aims to challenge harmful social stigma surrounding bladder leaks and to reframe the experience as common, manageable and non defining.

The film features real adult women, aged 25–64 who have experienced bladder leaks firsthand in different capacities engaging in everyday activities such as:
- Horse riding
- Exercise and martial arts
- Singing professionally
- Caring for children

The Advertisement includes a brief, matter of fact depiction of a woman placing a TENA liner into her underwear in preparation for daily activity. No nudity, sexual behaviour, or graphic imagery is shown at any point.
The Advertisement is designed to:
- Normalise continence care
- Reduce shame and silence around bladder leaks
- Encourage women to use appropriate products designed for bladder leaks rather than inadequate alternatives

The Rethink Bladder Leaks Advertisement has been broadcast across TV and digital platforms in multiple global markets (listed below) over the past two years, during which no similar notice has been raised.
- Germany
- Austria
- Portugal
- Netherlands
- France
- Spain
- Belgium

- Hungary
- Italy
- New Zealand
- United Kingdom
- Greece
- Lithuania
- Ukraine
- Ireland
- Switzerland
- Poland
- Slovakia
- Denmark
- Finland
- Norway
- Sweden
- Czech Republic

Consumer testing and validation of the Advertisement:
TENA undertook local pre and post airing ad testing for the TV advertisement to ensure that the campaign was responsible, effective and that it clearly communicated its intended message, portrayed women respectfully and helped reduce feelings of shame and embarrassment.

The research consisted of:
1. Consumer Quantitative Ad testing March 2025 – Harvest Insights (Pre Test)
2. Essity Inco Australia - Brand Health Study December 2025 – Kantar (Post Airing Test)

Pre Test Findings
TENA tested the Advertisement with 600 Australian women aged 35-70+ years before airing it on television. The research found at least 3 in 4 reported feeling more positively about incontinence / incontinence products after viewing the advertisement. The results also show 83% continue to enjoy watching this ad each time they see it on television.

Some of the comments by those who viewed the Advertisement in testing:
“I like that it showed a diverse range of women indicating the product is for all women regardless of age and background”
“The ad shows having incontinence doesn’t stop you from doing everyday activities”
“The message given – it’s a normal thing experienced by many – no shame!”
“That women shouldn’t feel shame about their bodies and changes that occur due to like experiences such as having kids”
“That incontinence isn’t taboo and shouldn’t be embarrassing.”
“TENA supports women with incontinence. There is nothing to fear about having incontinence if you use TENA because you can carry on with your life as normal”

Post Airing Findings
TENA regularly monitors perceptions of the brand’s role in breaking stigma and taboo around incontinence through its Brand Health Study. As per brand statement “Brave brand that breaks taboo” the results show a +5% year on year improvement, increasing from 18% in 2024 to 23% in 2025. While this improvement reflects a range of factors, the campaign has played a key role

in supporting this shift in the incontinence category— positive shift from a hidden condition to a more open and culturally understood condition

CAB / CAD clearance and rating
Both 30" TVC's were approved by Commercials Approval Bureau (NZ) and cleared by ClearAds Australia,. In each case the TVC's were confirmed as suitable for broadcast on television. Further to this, both TVC advertisements received a G rating by ClearAds Australia. The Free TV Commercial Television Industry Code of Practice, under 2.2.1, states that "material that has been classified C, P, G or PG may be broadcast at any time.

TENA has complied with the above guidelines and ratings and considers the above ratings as appropriate as they allow the TVC's to be broadcast at any time of day and considered appropriate for family viewing.

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

- AANA Code of Ethics\2.4 Sex/sexuality/nudity\S/S/N - general
- AANA Code of Ethics\2.2 Exploitative or Degrading\Degrading – women
- AANA Code of Ethics\2.1 Discrimination or Vilification\Gender

Due to the Community Panel's consideration not limiting to the specific issues raised by individual complainants. The response will address all parts of section 2.

- AANA Code of Ethics / 2.1 – Discrimination of 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 and 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

2.1 – Discrimination of vilification\Gender
The Code states:
Advertising or Marketing Communications prohibits the discrimination or vilification of any individual or group of people on the basis of certain defined attributes.
The defined attributes are:

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 differences.
Some of the complaints allege, which we deny that the Advertisement is vilifying to women. For example, one complainant stated, "It is disgusting and they show the actual female sitting on the toilet, putting on the TENA pad (like having a period) and also showing females wearing the pad through their underwear". Another complainant said in reference to the placement of the pad on the underwear is "The graphic demonstration is a breach of female privacy as viewers could be from any demographic. The demonstration is offensive to females."

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.
The Advertisement does not discriminate against or vilify any group. On the contrary, it:

- Broadens representation of women affected by bladder leaks
- Actively challenges ageist and sexist stereotypes
- Encourages empathy rather than judgement

The campaign message is inclusive and supportive.

2.2 – Exploitative or Degrading\Degrading – women

The Code states:
Advertising or Marketing Communications prohibits the use of sexual appeal in advertising which is exploitative of or degrading to any individual or group of people. Degrading is defined as – lowering in character or quality a person or group of persons.

Some of the complaints allege, which we deny that the Advertisement is degrading to women. For example, one complainant stated, "It shows women dancing around with flesh coloured underwear wearing TENA liners and also shows a woman putting one in her undies". Another complainant said "I have no issues about education but to have lingering close ups of a woman in briefs (holding a couple of children) and then it takes the biscuit when a pad is being applied by a seated woman on the toilet. It's absolutely disgusting."

The Advertisement is explicitly designed to restore dignity, not diminish it.

- Women are portrayed as strong, capable, confident and active
- Bladder leaks are depicted as something women experience, not something that defines or shames them
- The product is shown as a practical solution that enables freedom and participation

We believe depicting a woman placing a liner in her underwear or wearing the liner reflects normal, everyday behaviour and helps to position continence care as a natural part of self-care, rather than something to be hidden or obscured.
The scene with the underwear helps communicate the discreet nature of the TENA liner's design. By showing the product in use with underwear, it clearly demonstrates how thin and unobtrusive the liner is, reinforcing confidence in its discreet performance.

Our intention is never to cause discomfort, but to normalise an experience shared by millions of women. By presenting continence care openly and respectfully, we aim to build confidence, challenge outdated taboos, and encourage more women to find solutions that support their daily lives.

2.4 – Sex/sexuality/nudity\S/S/N – general
The Code states:
Advertising or Marketing Communications prohibits the harmful use of sex, sexuality or nudity in advertising and requires that such content must be appropriate for the relevant audience.
Some of the complaints allege, which we deny that the Advertisement use sex, sexuality or nudity. For example, one complainant stated, "I can't believe this was allowed to air on television it's filthy unnecessary video of women's genitalia, zooming in on their underpants, pubic hair and behinds". Another complainant said, "The TENA ad for liners which shows a

graphic photo of a woman's crutch with low cut panties". We submit that the Advertisement complies with Section 2.4 of the Code and the accompanying guidance set out in the Practice Note. The Advertisement does not depict sexual behaviour, sexualised imagery, or nudity.

- Underwear is shown in a functional, non sexual context, consistent with everyday advertising for clothing, sportswear and health products.
- The depiction of applying an incontinence pad is clinical and instructional, not sexual or prolonged.
- No genitalia are shown, and no camera angles are suggestive.

Other Relevant Sections (2.3, 2.5 – 2.7)
The Advertisement:

- Contains no violence
- Uses no offensive language
- Raises no health or safety concerns
- Is clearly distinguishable as advertising

Essity submits it complies with all remaining provisions of Section 2.

Conclusion

Essity acknowledges that discussion of women's health issues can evoke discomfort for some viewers. However, discomfort should not be confused with impropriety.
The TENA "Rethink Bladder Leaks" Advertisement:

- Is factual, respectful and non sexualised
- Seeks to dismantle harmful stigma
- Supports women to live more confident, unrestricted lives
- Demonstrates a measurable positive impact in reducing shame and improving attitudes towards bladder leaks and the continence care category
- Contains no sexualised imagery, no nudity and no degrading or exploitative treatment of women
- Cleared and classified G by ClearAds
- Complies fully with the AANA Code of Ethics

For these reasons, Essity respectfully submits that the Advertisement does not breach the Codes and requests that the complaints be dismissed.