

Decision of the ADVERTISING REGULATORY BOARD

Advertiser	Unilever South Africa (Pty) Ltd
Consumer/Competitor	Consumer
File reference	4714 – Sunlight Platinum
Outcome	Upheld
Date	18 June 2026

The Directorate of the Advertising Regulatory Board has been called upon to consider a complaint lodged against Unilever advertising for Sunlight Platinum.

Description of the advertising

The Advertising takes the form of the product packaging:



Complaint

The Complainant states that the front of product packaging states “100% plant-based actives” while on the back, in small print, it states “other non-plant-based actives are included”. The Complainant essentially argues that if other non-plant-based actives are included, then the product can’t contain 100% plant-based actives.

The Complainant further notes that the back label states that the product causes skin irritation and serious eye damage – not that it “can” or “may” cause these outcomes – and recommends that users wear face protection and gloves. The Complainant points out that this is not a usual requirement for doing the dishes.

Response

The Advertiser responded, inter alia, that the claim made on the packaging is intended to communicate the presence of rhamnolipids as a key surfactant ingredient included in the product. It provided a letter from the ingredient supplier of rhamnolipids, stating that they are *produced from sugar and are 100% natural manufactured by biological fermentation processes that are not derived from petrochemicals.* In plain language, it said, this can be understood as meaning the ingredient is 100% plant based.

The Advertiser then stated that the claim is accompanied by a disclaimer on the product back label, which states “*#Rhamnolipids. Other non-plant-based actives are included*”, which it said is intended to make clear to consumers that, in addition to the 100% plant-based rhamnolipids, the product also contains other non-plant-based actives.

The Advertiser also provided documentary evidence, which it says “objectively supports the claim in respect of the product”. The evidence, it said, has been independently verified by Professor Anwar Jardine, who is an associate professor and current research scientist and head of the department of chemistry at the University of Cape Town. His role and CV, also provided, the Advertiser said, confirm that he is appropriately qualified and considered to be an expert in the field to which the claim relates. His findings were attached, confirming that “Rhamnolipids are 100% plant based, renewable and biodegradable. It is also ultra-mild on skin, which sets it apart from other surfactant options.”

The Advertiser therefore submitted that the claim is communicated transparently and honestly to consumers, is fully substantiated, and is not misleading to consumers.

With regard to the warning statement on the back of the product bottle, the Advertiser stated that it emanates from the “Globally Harmonised System of Classification and Labelling of Chemicals (“**GHS**”), which is an internationally recognised, science-based framework designed to ensure consistent identification and communication of chemical hazards worldwide.” It further states that in South Africa, the use of GHS labelling is a compulsory regulatory requirement under the Hazardous Chemical Agents Regulations, administered by the Department of Employment and Labour. “These regulations require that hazard and

precautionary information be included on product labels to support the safe handling and use of chemical agents for workers who may be exposed over extended periods.”

The Advertiser stated that the inclusion of the GHS hazard information does not indicate that the product is unsafe when used as intended, but rather ensures that potential hazards are communicated transparently, including scenarios such as accidental exposures or misuse, and provides appropriate guidance on safe handling, based on the undiluted product as required by the GHS. However, the Advertiser stated, when the product is used as directed, the level of exposure to the consumer is significantly reduced.

Application of the Code of Advertising Practice

The following clauses were considered in this matter:

- Clause 2 of Section II – Honesty and responsibility
- Clause 4.1 of Section II – Truthful presentation: Substantiation
- Clause 4.2.1 of Section II – Misleading claims
- Clause 2.1 of Appendix G Advertising containing environmental claims – Absolute claims and statements

Decision

Having considered all the material before it, the Directorate of the ARB issues the following finding.

At the outset, the Directorate notes that the warnings printed on the label are dictated by regulation and as such do not fall within the jurisdiction of the ARB. The only issue that the Directorate can consider is the claim “100% plant based active”. In any event, the Complainant appears to have referenced the warning mostly in support of her submission that the product is not plant based.

The Directorate notes that under Clause 4.1 of Section II of the Code, which deals with “Truthful presentation: Substantiation”, the requirement is that: *“Before advertising is published, advertisers must hold in their possession documentary evidence as set out in*

Clause 4.1, to support all claims, whether direct or implied, that are capable of objective substantiation. . . Documentary evidence, whether in the form of survey data or any other documentation, must be up to date and current, and must have market relevance.”

Clause 4.1.4 states: *“Documentary evidence, other than survey data, must emanate from or be evaluated by a person/entity, which is independent, credible, and an expert in the field to which the claims relate and be acceptable to the ARB.”*

The Directorate notes the qualifications and areas of expertise of Professor Anwar Jardine establish him as a credible expert in the field to which the claims relate. The Directorate therefore accepts his assertion that *“Rhamnolipids are 100% plant based, renewable and biodegradable. It is also ultra-mild on skin, which sets it apart from other surfactant options.”*

While the Directorate accepts that the rhamnolipid ingredient is 100% plant based, it notes this is not what was disputed. The issue before the Directorate is in fact whether the claim “100% plant based active” leads the consumer to believe:

- That one of the active ingredients is plant based but there are other active ingredients (which appears to be the situation);
- That the only active ingredient is plant based, although there may be other non-plant based ingredients;
- That all the ingredients are plant based.

Clause 2.1 of Section II the Code, which deals with “Honesty and responsibility” states: *“Advertisements should not be so framed as to abuse the trust of the consumer or exploit their lack of experience, knowledge or credulity. Advertising should be prepared with a sense of responsibility to the consumer.”* Further, Clause 4.2.1 of Section II of the Code, which deals with “Misleading claims”, states: *“Advertisements should not contain any statement or visual presentation which, directly or by implication, omission, ambiguity, inaccuracy, exaggerated claim or otherwise, is likely to mislead the consumer.”*

While the Directorate accepts that Rhamno powder is 100% plant based, it has a number of concerns about the claim and its positioning on the product bottle.

In selecting a product off the shelf, if a consumer were to see the wording “100% plant based active”, the Directorate believes that they could reasonably assume that the whole product is 100% plant based or that the only active ingredient is plant-based – not that there is only one ingredient that happens to be derived from plants and a number of other active ingredients. The Directorate further notes that the word “active” may be taken to mean “active ingredient”, but it could also be an adjective (descriptive term) about the “action” of the product, making it unclear to the consumer what is actually being conveyed by the packaging. In addition, the “headline” nature of the claim leads the consumer to believe that this claim is pivotal to the nature of the product, which lends support to the idea that this is the only active ingredient.

The wording is, at best, ambiguous. It could reasonably communicate any of the 3 interpretations listed above, only one of which would be correct. It appears that the more accurate claim would be “made with 100% plant based Rhamno powder”.

The Advertiser points out that it states “other non-plant-based actives are included” on the back of the packaging. The Directorate does not accept that this is sufficient to avoid confusion. Simply put, it is not permissible to make a statement that is confusing at best, and misleading at worst on the front of a product, and then clarify on the back of the product that this is not the only active ingredient.

Finally, the Directorate notes that plant-based claims carry weight with consumers, who are often eager to reduce their use of chemicals for health or environmental reasons. Indeed, it is no doubt for this reason that the Advertiser has “headlined” this one active ingredient. This is, in effect, a type of greenwashing.

This being the case, the Directorate finds that the claim made on the front of the product packaging is misleading and in breach of Clauses 2 and 4.2.1 of Section II.

It is unnecessary for the Directorate to consider the remainder of the clauses of the Code at this time.

Sanction

The Advertiser is instructed to amend the claim appearing on the front of the packaging stating “100% plant-based active” without further context or clarity, within three months, as required by the Procedural Guide.