

Does anti ageing advertising have a future?

Dr. Chris Gummer

Omnilux Revive - Before and After Photographs

Cider Solutions Ltd.



BEFORE



AFTER



BEFORE



AFTER

Omnilux Revive - Before and After Photographs



Cider Solutions Ltd.



BEFORE



AFTER



BEFORE



AFTER



The conundrum and who's to blame!

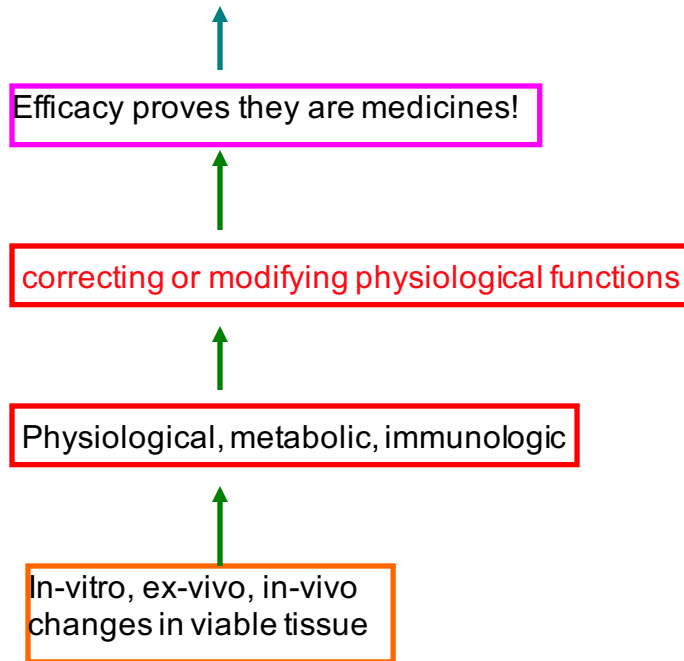
Cosmetics Borderline Medicines (disease and diagnosis)

Mainly superficial

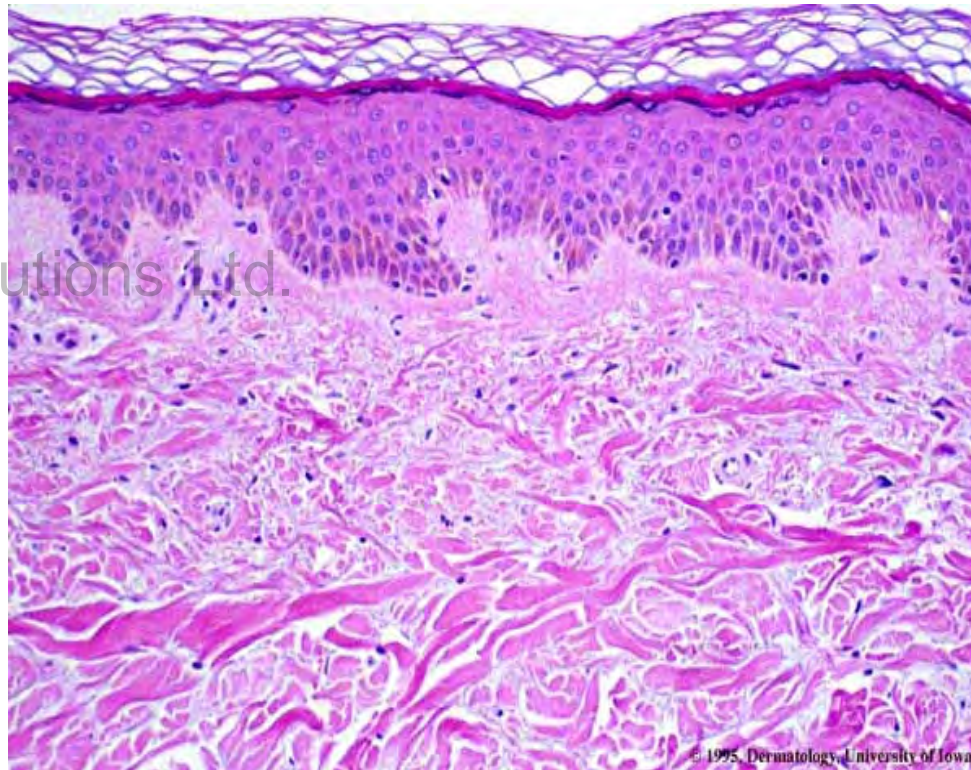
Not very efficacious

Efficacy measurement depends on exacting methods finding small changes.

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We need to have freedom to play anywhere in the skin



Anti ageing claims – where are we today

Olay Total Effects 7-in-1 Anti-Ageing Day Moisturiser with SPF-15

★★★★★ 1029 [Read All Reviews](#) | [Write a Review](#)

Total Effects Day Moisturiser is your 7-in-1 age-defying solution for younger-looking skin. It provides seven age-defying benefits in one essential product, plus UVA/UVB (SPF15) protection to help protect your skin from sun damage.



Olay Total Effects 7-in-1 Age-Defying Day Moisturiser with SPF gives you 7-in-1 age-defying effects for visibly younger-looking skin.

Minimises lines: helps to visibly reduce the appearance of fine lines and wrinkles.

Nourishing moisturisation: for a radiant glow.

Tone enhancement: balances colour and helps to visibly reduce the appearance of age spots.

Gentle exfoliation: smooths and evens skin texture.

Pore refinement: minimises the appearance of pores.

With antioxidants: helps prevent free radical damage to the skin's surface layers.

Subtle firming: hydrates for a firmer skin feel.



Olay Eyes Pro-Retinol Eye Treatment 15 ml For Deep Wrinkles

★★★★★ 2 [Read All Reviews](#) | [Write a Review](#)

Olay Pro-Retinol Eye Treatment is our best wrinkle-fighting technology with Pro-Retinol and Pentapeptides. It smooths the look of even deep wrinkles.



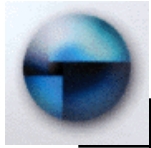


Pro-Xylane

Our skin becomes finer and more fragile as we age. Collagen levels drop, leading to lines and wrinkles. Thank goodness for Pro-xylane, a powerful wrinkle-zapping active ingredient.

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Believable, or not?

L'Oreal website

**PRO-XYLANE, THE LATEST ANTI-AGEING
SUPERSTAR**

Pro-xylane comes from a natural sugar called Xylose and is the first global action, anti-ageing molecule capable of rebuilding our skin's extra-cellular matrix. In other words Pro-xylane restructures all of our skin's support tissues. It can deal with deep wrinkles, dry skin and sagging, to leave our skin youthfully dense.



Supported by in-depth science

28 April 2009



Anti-ageing cosmetic reduced wrinkles in clinical trial

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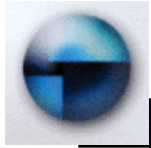


Scientists testing a cosmetic anti-ageing product sold on the high street have shown it can clinically reduce wrinkles and improve the appearance of skin damaged by everyday exposure to sunlight.

Measure of periorbital wrinkles and increase fibrillin-1 production.

“Our findings demonstrate that a commercially-available cosmetic can produce significant improvement in the appearance of facial wrinkles following long-term use,”

“It is rare for such benefits to be reported for an over-the-counter anti-ageing product and this study paves the way for larger studies with more statistical power.” Prof. Griffiths, Univ. Manchester 2009



The claims box!

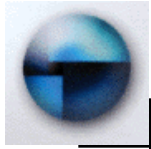
Medicines directive:

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Article 1 of Directive 2001/83/EC (as amended) [3] defines a ‘medicinal product’ as:
‘Any substance or combination of substances presented as having properties for treating or preventing disease in human beings; **or**

Any substance or combination of substances which may be used in or administered to human beings either with a view to restoring, correcting or modifying physiological functions by exerting a pharmacological, immunological or metabolic action, or to making a medical diagnosis’.

Across the world, anti-ageing products and ingredients that are not drugs or medicines are already in a well defined legal and advertising box.



Changing advertising rules

Verification (UK)

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What does 'verifiable' mean?

'Verifiable' simply means setting out the relevant information about a comparative claim in your ad or signposting how the information used to make that comparison can be checked by the target audience.

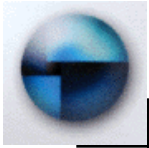
The CAP Code requires that comparisons with identifiable competitor products "must objectively compare one or more material, relevant, verifiable and representative feature of those products" (Rule 3.35).



Claims requiring verification

- Better than the leading
 - Compared to a £100 cream
 - Unsurpassed performance.
 - The most effective anti ageing ingredient
- You need to provide the ad's audience with enough information about the comparison to understand it. **If the checking requires special knowledge most consumers are unlikely to have, readers should be able to get a knowledgeable and independent person or organisation to verify the comparison using that information.**

Will your own data make you a medicine?



“up to” claims

Claim: *Up to 60% reduction in (the appearance of) flaws*

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UK -10% of the sample population at the claimed value with a reasonable spread of data to show most users get some benefit.

US – considering 50% of data at the claimed value.



Anti-ageing supplements

Could a collagen drink REALLY make you look younger? Experts break down anti-ageing supplements and shakes

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- Supplements, shots and now shakes claim to replace collagen to keep skin looking younger longer
- As we age, we lose collagen, which gives skin its elasticity and strenght
- Experts told Healthista's Vanessa Chalmers broke down the science behind collagen products

By VANESSA CHALMERS FOR HEALTHISTA

PUBLISHED: 23:33, 2 March 2018 | UPDATED: 09:27, 3 March 2018

Rejuvenate your skin from within with VERISOL Bioactive Collagen Peptides
Clinical studies have shown it to reduce eye wrinkle depth, improve skin elasticity, counteract skin aging, support skin hydration and improve skin appearance*

Supplements work from the inside out.

Are they maintaining, improving or *changing* the skin and its structure?

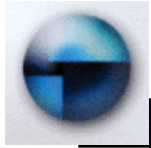


US dietary supplement structure function claims

"structure/function" claims, within the broader category of "statements of nutritional support," refer to representations about a dietary supplement's effect on the structure or function of the body for maintenance of good health and nutrition.

notify FDA and include a disclaimer that the claim has not been evaluated by FDA and that the product is not intended to diagnose, mitigate, treat, cure, or prevent disease

Is anti-ageing skin care maintenance of good health and nutrition or the treatment of a disease?



Anti ageing devices and anti ageing medical devices

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EH-XT20 3-in-1 Micro-Current Facial Enhancer

Retail Sales Price: £ 199.99

SHOP

Personal & Health Care > Skin Care

EH-XT20

★★★★★ (1 review)

Everyday anti-aging care in just a few minutes

A careful skincare routine is essential for youthful looking skin. Inspired by holistic Japanese beauty secrets, the 3-in-1 Microcurrent Enhancer uses a combination of advanced technologies to optimise the effects of your regular skincare products for improved moisturising, giving you less visible pores and firmer contours with fewer wrinkles*.

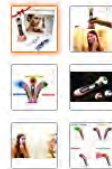


美肌の秘密
エイジングケア習慣

* Decrease in wrinkle depth after 4 weeks, in usage with night cream (compared to untreated area) study by Institute Dr. Schrader.

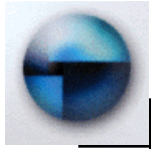
Rejuven Skin 5-in-1 Anti aging device combining Galvanic, Ultrasonic, Photon Therapy and Micro-vibration to reverse aging, tighten skin. reduce fine lines and wrinkles [Lift Care](#)

★★★★☆ 31 customer reviews | 10 answered questions



About the product

- NEW LIMITED EDITION ROSE GOLD Rejuven Skin Anti aging device that combines the latest skincare technology to revitalize and restore.
- Combines Ultrasonic, Galvanic (Nutrition in/out), Photorejuvenation, and Micro-vibration simultaneously to deliver increased collagen production, blood circulation, promote lymphatic drainage and improve skin conditions
- In just minutes a day, helps reduce wrinkles, improve skin elasticity and face contour, diminish blemishes, and rejuvenate your entire complexion



Device approval

“FDA approved”

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510K approval = substantial equivalence determination compared to a predicate device

Can a device use the same claims made by the predicate device?

“In short, the answer is “no”, a firm may not merely “piggy back” on the claims of a similar device without appropriate supporting data/information.” (FDA)




Age-Defying Eye Wrinkle Correcting Laser


£299 **NOW £149** - £150 Off


FREE and Cosmetic Bag (worth £19.99) when you purchase Eye Wrinkle Laser

Wishing you could fade those eye wrinkles.

Now you can use dermatologist-recommended, fractional laser technology to treat fine lines and wrinkles around the eyes at home. For eye-opening results that you can truly see.

 Fast and Powerful

 Ergonomics

 Perfectly-sized

Citrus Solutions Ltd.

LightStim®

[Home](#)

[The Lights](#)

[LED Bed](#)

[Professionals](#)

[Support](#)



Reduce and eliminate fine lines and wrinkles

Restore your skin's youthful appearance

Help preserve your youthful skin

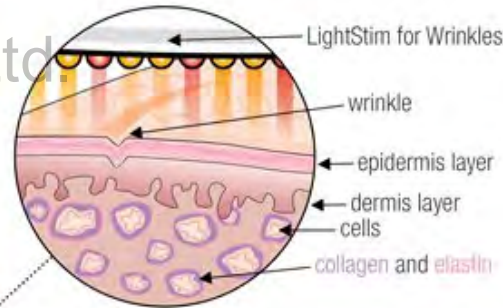


Naturally Erases Wrinkles

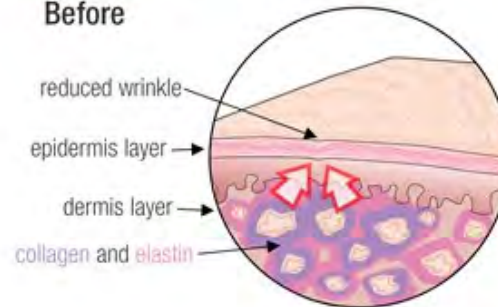
As we age, the volume of collagen and elastin in the skin decreases, allowing lines and wrinkles to form.

LightStim for Wrinkles provides rejuvenating wavelengths of light energy, which can be absorbed by the skin helping to create more volume.

Over time this increased volume plumps up the dermis layer, gradually helping to push out lines and wrinkles.



Before



After 8 Weeks

Expect to see the first signs of improvement in 6-10 weeks, with continual improvement thereafter.



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What does the future hold?

An active and enquiring consumer demanding access to information

The screenshot shows the Sense about Science website. At the top left is the logo, a circle with a red and blue border, and the text "SENSE about SCIENCE". To the right are navigation links: "Who we are", "What we are doing", "Campaigns & news", and "Give". Below the navigation is a search bar. The main content area features a background image of several white buttons with a red heart and the text "I LOVE EVIDENCE" and "www.askforevidence.org". A white text box is overlaid on the buttons, containing the following text:

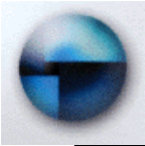
Sense about Science is an independent campaigning charity that challenges the misrepresentation of science and evidence in public life. We advocate openness and honesty about research findings, and work to ensure the public interest in sound science and evidence is recognised in public discussion and policymaking.

Below this is a yellow banner with a cartoon illustration of a man with a mustache talking on a mobile phone, a woman with a white headscarf, and a child. The banner contains the following text:

/ ASK FOR EVIDENCE

Ask for Evidence is our public campaign to help people request for themselves the evidence behind news stories, marketing claims and policies.

CURIOUS? VISIT THE WEBSITE... →



Validation – more demanding scrutiny of data and consumer relevance

Scientific Devices

Visioscan® VC 98 USB

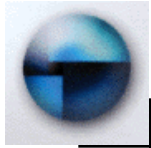


Visioscan® VC 98 - Skin Topography directly from the Skin



The Visioscan® VC 98 is a unique UVA-light video camera with high resolution to study the skin surface directly. The images show the structure of the skin and the level of dryness very impressively but it can also be used on spots or hair and scalp. With its multi-functional software, the Visioscan® VC 98 is a very flexible system to characterize skin surface condition easily, accurately and very economically.

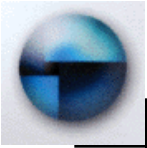
“what magnitude of change measured by the Visioscan equates to a visible change measured by an expert skin grader or consumer?”



Topical anti ageing - It's only glycerin and a sunscreen

Almost all current, permitted, anti-ageing claims for topical products can be achieved with two ingredients!

Reduce the appearance of flaws
Brightens and radiance
Softness and elasticity
Plumping and firmness
Reduces appearance of age spots
Reduces age-related dryness etc.



Where would you want to be?

New claims will need to cover rebuilding, regenerating, replacing, removing, changing or improving structure and function, activating, correcting....

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But!

You can only claim a measurable and meaningful change in appearance by an unspecified mechanism.



Cosmetic (topical and device) products and ingredients have a very limited claims future

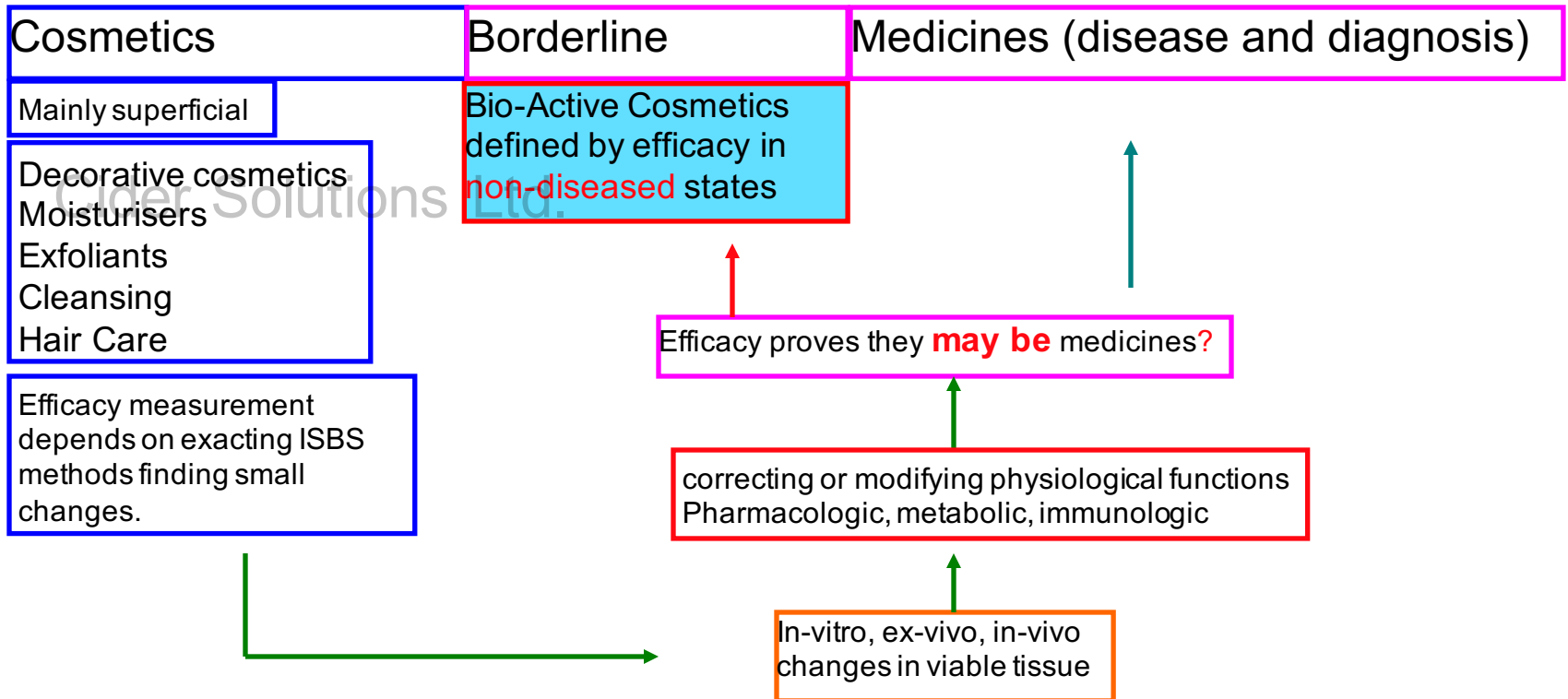
...products intended to affect the structure or function of the body, such as the skin, are drugs, or sometimes medical devices, even if they affect the appearance. So, if a product is intended, for example, to remove wrinkles or increase the skin's production of collagen, it's a drug or a medical device. (FDA & MHRA)

Unless the cosmetics industry challenges this position and finds a middle ground for active anti-ageing ingredients and products you will increasingly be constrained by regulation and a limited and ever diminishing set of claims.

Indeed, cosmetic claims for topical products may have already run their course.



The master plan





The master plan

Cosmetics

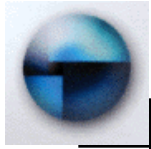
Borderline

Medicines (disease and diagnosis)

Bio-Active Cosmetics
defined by efficacy in
non-diseased states

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Cosmetic - MHRA panel
Definition of conditions cf. disease
Submission process
Body of data
A review of safety assessments
Cosmetovigilance



Does anti ageing advertising have a future?

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Yes, but!

Doing the same thing just gets you more of the same
and the world is changing!



Cider... ions Ltd.

OLAY

SHOP PRODUCTS OUR COLLECTIONS OUR HERITAGE SKIN CARE TIPS OFFERS #OLAYAGELESS

SKIN ADVISOR

**YOUR SKIN AGE
IN A SNAP**

TRY IT NOW!

SKIN AGE: 34 ⓘ

BEST AREA

IMPROVEMENT AREA

4:21 PM 100%

Skin advisor estimates your skin age based on a photo analysis of your skin's appearance