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Towards the common good

Effective consumer protection promotes market efficiency. The constantly changing operating environment requires that public authorities and the business community increasingly work together. The Finnish Consumer Agency's new website continues this valuable tradition, which is aimed at making it easier for businesses to deal with day-to-day issues. We hope that our new pages will better serve the need to combine business goals with consumer protection.

There are many ways to work towards the common good. The Confederation of Finnish Industries is calling for better regulation, to avoid unnecessary meddling by authorities. In a project that started at the beginning of 2007, the organization is striving to improve interaction between business, authorities and the courts in order to clarify rules.

In addition to clear legislation the Confederation of Finnish Industries is demanding the efficient and speedy handling of disputes by authorities and courts. Businesses' goals in this respect go hand in hand with the need to improve consumer protection. As the organization notes, in order to achieve this goal, sufficient resources must be provided for authorities. Increasing efficiency does not mean simply revising legislation; authorities must also have effective means to intervene when firms step out of line.

Better regulation is also a key theme in the EU. In consumer policy the goal is to clarify rules without lowering the level of consumer protection. Several projects are under way to harmonize and develop consumer legislation in the EU. Projects in other sectors such as communications also have considerable impacts on consumers' legal position.

The Consumer Agency has proposed on several occasions that, as part of EU and Finnish action programmes in the area of better regulation, there is a need to create practices to evaluate the impacts of legislation on consumers and take these into consideration when legislation is prepared.

Developing consumer protection is about more than regulation. Businesses should also develop operating models that promote consumer protection and competitiveness at the same time.

A good example of how to take consumers' basic rights into consideration is Nordea's customer ombudsman model. The customer ombudsman welcomes feedback and on this basis the bank strives to improve the way it operates. The model can also provide managers ideas for developing operations. People have been grumbling about customer service for years, so new models are needed.

It is also easier for small firms to apply basic consumer rules in an online environment. A good example is Positivari Ky, which has clear and simple terms for online customers. In addition to paying with a bank or credit card, customers can also ask to be invoiced.

Anja Peltonen
Editor-in-Chief, Director of the Consumer Law Division

Read more
www.kuluttajavirasto.fi: Press release 13.8.2007: Companies need to improve their customer services - Queues and indifference eroding consumer protection
Consumer viewpoint in loyalty marketing
- results from a new barometer

What's wrong with loyalty marketing? Is there anything wrong?
Written by Mr Harri Saloranta, managing director of Nero Partners Oy

Loyalty marketing is having a heyday in Finland. On average consumers have 4.2 loyalty cards in their wallet, and the number is expected to go on rising. New loyalty programmes are being established and existing programmes are being fine tuned.

A new barometer was set up in autumn 2006 to monitor loyalty programmes and related marketing. Loyalty House Oy and Nero Partners Oy conduct customer surveys for the barometer three times a year. The latest results came out in August 2007. The sample included 1,052 respondents and covered the entire nation.

What consumers think about loyalty programmes
Consumers generally take a positive view of loyalty programmes. Over 60% of respondents say it is fairly important or very important for businesses to have a loyalty programme. They think loyalty programmes are useful and should be developed further.

The barometer indicates that development has indeed taken place. The following table shows the percentage of respondents who agree with various statements concerning loyalty programmes. The table gives averages for all the loyalty programmes included in the barometer. The results for individual programmes vary considerably and some programmes receive very good feedback from consumers. The best and worst results for individual programmes are given in brackets.

<table>
<thead>
<tr>
<th>Statement</th>
<th>Percentage</th>
<th>Sample</th>
</tr>
</thead>
<tbody>
<tr>
<td>Encourages me to shop and buy more</td>
<td>22 %</td>
<td>(56 / 8)</td>
</tr>
<tr>
<td>Offers many kinds of benefits</td>
<td>20 %</td>
<td>(64 / 9)</td>
</tr>
<tr>
<td>Principles are clear and understandable</td>
<td>37 %</td>
<td>(69 / 22)</td>
</tr>
<tr>
<td>Sends customers interesting materials</td>
<td>35 %</td>
<td>(67 / 5)</td>
</tr>
<tr>
<td>Keeps evolving enough to keep me interested</td>
<td>9 %</td>
<td>(28 / 1)</td>
</tr>
<tr>
<td>I receive positive attention as a programme member</td>
<td>27 %</td>
<td>(43 / 16)</td>
</tr>
<tr>
<td>Strengthens my loyalty</td>
<td>22 %</td>
<td>(55 / 11)</td>
</tr>
</tbody>
</table>
Attitudes towards the use of collected information

Through loyalty programmes businesses also collect information on customers' purchasing behaviour. Many customers are not happy about this. 50% of respondents do not like the idea of businesses collecting information on them personally or how they shop, but want to protect their privacy.

One-third of respondents said they would not mind giving more information in return for better offers that are tailored to their needs. Respondents were asked what they thought of a sample situation in which a customer buys a flat-screen TV and a week later receives an offer for a home theatre system. One in three respondents considered this good loyalty marketing, while one in five objected to what they perceived as spying.

In another sample situation, a customer receives a special discount on products that she frequently buys, according to collected data. Over 50% of respondents viewed this as a good thing, while slightly more than 10% objected strongly. It appears that customers are much more likely to approve the use of information if they get concrete benefits in return.

Using new media

Customers have strong reservations when it comes to being sent information about a loyalty programme by e-mail or particularly text message. Slightly over one-third would be interested in receiving information by e-mail, but only 10% by text message.

The use of new media in loyalty marketing is a hot topic and it will be interesting to see how consumers' attitudes change in future.

The next survey will be conducted in late 2007, and this will show whether consumers' opinions have in fact changed - and in what direction.
Loyalty marketing rules promote market efficiency

Applying basic marketing rules to loyalty marketing can be difficult, since programmes and benefits vary a great deal. The problem is how to build advertising when the main emphasis should be on products and services. On the other hand consumers also want information about loyalty programmes.

The Finnish Consumer Agency published guidelines on loyalty marketing and loyalty programmes in January. The guidelines are a broad information package that is based on legislation as well as decisions made by the Consumer Ombudsman and the courts. The guidelines are intended to help marketers by providing examples of the information that must be supplied in different situations.

The guidelines were clearly needed, since the rules of loyalty marketing had seemingly been forgotten and in many respects marketing did not comply with the requirements in the Consumer Protection Act. Since the guidelines were published, practices have been improved, although problems still arise.

What is at issue is not just the information that must be provided in marketing and the way it is presented. Loyalty programmes also have some features that are not conducive to an efficient market.

Loyalty programmes reduce consumer mobility. The goal is to get customers to consolidate their purchases with a specific chain or group of businesses. Some programmes use a progressive bonus system. The more customers spend, the more they get back. This may not be the most economical solution for customers, taking all things into consideration.

Making wise decisions is even harder when loyalty programmes make it difficult to compare prices. Broad schemes are complicated, since they contain products and services in different fields and benefits often depend on the type of service or product. Progressive bonuses also cause headaches. Consumers find it very hard to figure out in advance how much money they will get back from a progressive scheme, much less compare refunds from different schemes.

Consolidating purchases is wise only if it results in the best value for money compared with a competing programme. In practice, when bonuses are accumulated it is impossible for consumers to know in advance whether they are getting more for their money than they would have if they had made purchases elsewhere. Prices are transparent only if customers receive benefits immediately, for example in the form of special offers.

Main emphasis on products
The starting point in the guidelines is simple. Loyalty programmes are additional benefits, which can only be received if a customer buys something.

The basic rule that additional benefits may not dominate marketing at the expense of the actual product also applies to loyalty programmes. To support market transparency and help consumers make wise purchasing decisions, it is important to make sure that marketing always places the main emphasis on the actual product and price information. If the purpose of marketing is specifically to attract new members to a programme, then what is important is to provide essential information about membership in the programme.

Not everyone wants to join a loyalty programme, and most people do not want to belong to lots of programmes. Joining a programme may cost money and many people do not like the idea of having information concerning their purchases recorded and processed. Marketing aimed at members of a
programme often reaches other customers as well. If products are also available to non-members, marketing must clearly provide the appropriate price information for non-members.
Britain working to weed out excesses in cosmetics advertising

At what point do claims concerning anti-wrinkle creams become misleading advertising? Britain draws the line using the same principles as Finland. Advertisers must be able to substantiate concrete promises about the effect of a product.

During the past year Britain's Advertising Standards Authority (ASA) has intervened in numerous advertising campaigns arranged by large and well-known cosmetics companies. The ASA's decisions follow the same lines as the rules on cosmetics advertising that the Finnish Consumer Agency issued last spring.

According to those rules advertising must give a truthful overall impression at first glance. If percentage figures concerning the effects of a product or other measurable or visible claims are presented, the advertiser must be able to substantiate these. Advertising must tell on what scientific evidence or sample the result is based.

Limits on hype and scare tactics
The latest case in which the ASA has taken action concerns Clarins Expertise 3P spray. In August the company had to pull a press ad that claimed the product protects the skin against damaging electromagnetic waves. The ASA decided that the studies presented by Clarins were not robust enough to substantiate claims. The ad also played on irrational fears by using statements such as this: "If electromagnetic waves can penetrate walls, imagine what they can do to your skin."

In July the ASA stopped a TV and press campaign for L'Oréal Telescopic mascara because advertising gave an exaggerated picture of results. The company promised lashes "up to 60% longer". Using the product did not result in an actual extension in the length of lashes, but only made lashes appear longer.

To make matters worse, it turned out that the actress puffing the product, Penelope Cruz, was wearing a few individual false lashes inserted into her natural lashes to make them look better. The ASA said that L'Oréal should always include a disclaimer in future ads featuring models wearing false eyelashes.

At home alternative to surgery?
Advertising claims concerning anti-ageing products seem to be especially problematic.

In January 2007 the ASA upheld a complaint against Avon concerning a catalogue ad for Anew Clinical wrinkle remover. The ad described the product as "the at home alternative to surgery" and "the new wave in face lifts". In autumn 2006 the ASA reprimanded Clinique for print ads that claimed Repairwear eye cream triggered the skin to smooth out wrinkles. In 2005 it halted a campaign for L'Oréal Wrinkle De-crease featuring top model Claudia Schiffer. In all these cases the cosmetics companies were not able to present adequate scientific evidence to back up advertising claims.

Advertising that is misleading and makes excessive claims ultimately hurts the cosmetics industry itself. If leading companies break professional codes, they erode the industry's credibility and put a dint in consumer confidence.

For more about the Advertising Standards Authority's decisions, see cosmeticsdesign-europe.com, which provides news on cosmetics formulation and packaging.
TV games cause problems also for adults

TV games and contests are not just for children; some are aimed at adults. Problems in this area also concern adults as well as minors.

A lot of attention has been drawn to problems associated with minors playing TV games and contests and running up large bills. The Finnish Consumer Agency has also received numerous queries about TV games aimed at adults, however. Consumers have complained about misleading rules and inadequate instructions.

The Consumer Agency has conducted negotiations with broadcasters concerning TV games and contests on several occasions. Now it has reminded them that consumers - whether they are minors or adults - must be informed in a clear and easily understandable way regarding instructions for playing, costs and other rules that may apply. Consumers must also have a chance to study this information before they start playing.

During a TV game the main rules must be displayed on the screen. The announcer, if there is one, must also repeat the rules orally. Complete rules concerning the game and participation must be supplied on a website and teletext page as well.

Consumers must be told how much it costs to participate and what the price includes. They should know, for example, whether they only have to pay a single charge or whether several calls or text messages are required.

Realistic picture of chances
Marketing may not lure viewers to participate with false promises. The announcer or text must clearly state what participants must do to win and how the game works. Information concerning prizes and the chances of winning must be truthful.

In planning game rules and instructions, the special features of the target group must be kept in mind. Broadcasters must remember that minors have narrower knowledge and experience than adults. There are also vulnerable consumers among adults, for whom clear information concerning rules and chances are particularly important.
Promotional games take advantage of minors' lack of experience

Surreptitious advertising is never allowed. Advertising must be clearly identifiable as such, regardless of the style of presentation or medium, whether it is aimed at adults or minors. The Finnish Consumer Agency often finds that web pages aimed at children and young people overlook these rules when advertising is combined with games.

Minors may not fully understand the purpose of the logos and advertising that are built into promotional games. Special attention should be paid to keeping games and advertising separate in services that are aimed at children or may appeal to them.

The Consumer Agency has intervened in cases where logos and products that appeal to children have been used in games on websites that offer advertising.

Marketing cannot be given the form of a game or activity page if a website markets product or brands that appeal to children. Even if an age limit has been set, it is easy for minors to get around this. Consequently it is not usually possible to put promotional games on a website. Games and other entertainment must be clearly separated from advertising.

Consumers always have the right to know when they are being influenced commercially. Advertisers should bear their responsibility for seeing that established principles concerning marketing aimed at minors are taken into consideration in the information society.
Which comes first, the user or technology?

In deciding on the use of frequencies that are no longer needed for analog broadcasts and in planning new services, a user-centred approach should be taken.

A working group that was appointed by the Finnish Ministry of Transport and Communications has deliberated ways to use frequencies that are no longer required for analog broadcasts and the criteria for making decisions. Attention should be paid to high definition, mobile, pay and pay-per-view channels as well as the growing use of cable, broadband, Internet and satellite systems in distributing TV programmes.

In its statement the Finnish Consumer Agency emphasized three things. First of all introducing new technology should not be viewed as an end in itself. Before decisions are made, it is important to find out whether there is a demand for new technology and what effects it will have on consumers. Households in Finland have recently had to purchase digital receivers. (Analog broadcasts ceased at the end of August 2007.) It is important to make sure that these continue to provide basic services for a sufficiently long time.

Secondly the Consumer Agency pointed to the need for a sufficiently long transition period, during which technical services operate in parallel. Consumers should be able to use the equipment they have purchased for the whole of its normal service life. Decisions regarding new technologies should be made so that they do not result in unnecessary costs.

Thirdly it is important for new technology and equipment to be sufficiently developed before it is introduced. Technological changes should not weaken consumer protection owing to glitches in equipment. Standards alone cannot ensure consumers' right to faultless equipment, as many people discovered when the first digital receivers came on the market. Manufacturers must make sure that equipment is free of defects and works the way it should before placing equipment in shops.
Complaints about the marketing of natural products

In 2006 and 2007 the Finnish Consumer Agency has received numerous complaints about the distance selling of natural products. Companies have used questionable practices and violated the law. The Consumer Agency has issued guidelines that review the basic rules concerning marketing and distance selling in this field.

The Consumer Agency has received positive feedback from businesses concerning the measures it has taken in the natural products field, which shows that the guidelines were clearly needed. Businesses have considered it important for the credibility and development of the whole field that wayward companies be cautioned and rules clarified.

The most problematic case involved a company that used misleading marketing to lure consumers into placing a one-year standing order, which the company then refused to cancel. After ordering a sample costing €29.90 consumers were astonished to find themselves tied to a standing order and facing a total price amounting to hundreds of euros. When consumers wanted to cancel and refused to pay, the company sent bills to a collection agency.

Among other things the Consumer Agency has received complaints about the following, among other things:
- being sent unordered products
- being given incomplete and misleading marketing information
- being tied to a standing order or fixed-duration order after ordering a sample
- being tied to a standing order on the basis of a sample, drawing, contest or trial
- not being told the whole price of a sample, including mailing costs
- not being able to cancel an order
- poor customer service
- unjustified debt collection.

In addition to the natural products field, the Consumer Agency reminded businesses selling beauty products and lingerie of marketing rules. Half of the companies that were contacted said they already comply with the guidelines or will bring their practices in line with requirements. The Consumer Agency will take measures to see that the remaining companies agree to abide by rules.

Some firms selling natural products are based outside Finland and do not even have an office in Finland. Finnish authorities' possibilities to intervene in their activities are therefore limited. The Regulation on consumer protection cooperation, which came into force at the end of 2005, provides new tools to improve cross-border cooperation, however.
Consumers should have access to source materials

If marketing claims are purportedly based on research, consumers should have access to source materials. In planning advertising campaigns it is important for businesses to ensure that the information on which marketing is based is available to consumers.

"Independent surveys have repeatedly shown that shopping baskets are cheaper at our shops and supermarkets," says a newsletter published by Osuuskauppa Ympäristö, a cooperative that belongs to the S Group. According to a report received by the Finnish Consumer Agency, when a customer asked for substantiation the cooperative could not or would not provide source information.

Many of the price comparisons that are conducted by the Consumer Agency have shown that there can be large differences not only between chains but also between shops in the same chain in a particular area. Since ads seldom present the details of price comparisons, owing to lack of space, it is essential to ensure that consumers have access to comparisons that are referred to in marketing.

Chapter 2 section 4a of the Consumer Protection Act concerns comparative advertising. Legislation and decisions issued by the Market Court require that advertisers must be able to substantiate claims.

Research must be competently done, generally by an independent party. Price comparisons must be recent so as not to be misleading. Far-reaching deductions or generalizations should not be made on the basis of comparisons if these are not supported by results.
Offensive and threatening elements used in advertising

Marketing often tests the bounds of good practice. Recent examples include a print ad for a clothing store that portrayed violence, a commercial for a women's magazine that was offensive to both sexes, and pictures on a bank website that used children as objects.

Cult Denim, a clothing store that sells mainly to the younger crowd, placed an ad in a free paper (City) that showed the mauled face of a young man who has apparently been beaten up. Readers were told to buy clothes at Cult Denim or else run the risk of getting "messed up bad".

Even though the violence portrayed in the ad was not real, there was no clear connection between the ad and the product, in this case clothes. The ad was clearly contrary to good practice for this reason alone.

Furthermore the ad was aimed at young people and minors or could easily reach them. This kind of marketing is always subject to stricter evaluation than other marketing.

A humorous intent is no excuse
An ad in MeNaiset magazine stated: "The problem with some women is that they get all worked up about some loser and then end up marrying him." According to the advertiser, the intent was to use playful humour and not to offend anyone. Yet the message can be interpreted in a different way: women are harebrained and make stupid decisions and men are worthless.

If advertising gives an offensive picture of a particular group of people, saying it was meant to be humorous and should not have been taken seriously is no excuse. It does not matter whether an ad is part of a broader campaign. In addition to the whole campaign, each part of a campaign must comply with the requirements in the Consumer Protection Act.

Restrictions on the use of children in advertising
Société Générale, which offers banking services, showed pictures of children in the section of its website marketing derivatives. Portraying children in advertising is only permitted if it can be considered a natural part of the advertising environment or necessary to show the product in actual use. Even in such cases advertisers should avoid giving the impression that children are being exploited to sell the product or service.

Société Générale's website drew a parallel between children and financial derivatives. Since it is hard to see a clear connection between the two, one cannot avoid the impression that children were portrayed simply to appeal to customers.

The three advertisers were told to change their advertising so as to comply with legislation and to pay more attention to good practice in future.

Read more
Current Issues on Consumer Law 1/2007, Focus on good practice in marketing
Firms should be more careful about checking ads

The Finnish Consumer Agency often has to contact the same firms about the same matters that have come up before. Firms should devise better ways to check advertising and make sure it complies with the law before it is released. The Consumer Agency also advises firms in questions concerning marketing and consumer protection.

The Consumer Agency called attention to a Coca-Cola commercial that violated an existing ban. The dominant message in the campaign was that consumers could get a T-shirt by collecting codes from eight bottle caps. The commercial said that additional information concerning the offer was available on bottles.

Earlier the Consumer Ombudsman had banned Coca-Cola Finland from using a contest, drawing or additional benefit in its marketing in such a way that participation in these and benefits dominated advertising at the expense of the actual product. The ban was backed by a €50,000 conditional fine.

The commercial failed to provide the information required in Chapter 2 section 4 of the Consumer Protection Act. The commercial did not say how long the offer was valid or indicate the value of the benefit or what consumers had to pay to get the benefit.

The company pulled the commercial after the Consumer Agency protested that it infringed the Consumer Protection Act and the marketing ban.
Price must be indicated regardless of the medium

The Finnish Consumer Agency has intervened in cases where a business has failed to indicate the price of a specified product and claimed that this was unnecessary because an ad was general image marketing. A recent ruling by the Supreme Court has clarified rules about when prices must be indicated.

A basic rule is that businesses must indicate the selling price in advertising, according to the Decree on the Indication of the Prices in Marketing Consumer Products and the Consumer Protection Act. The selling price must always be indicated when a retailer markets specified products.

Businesses cannot get around the obligation to indicate prices by referring to some other source of information, such as a website. The obligation to indicate prices does not depend on the medium: a price must always be given next to a picture or text that specifies a product. The Consumer Agency intervened, for example, when a daily paper placed advertising on buses that said "Order Hesari" (Hesari = Helsingin Sanomat) without supplying price information.

Recent court decisions have dealt with the distinction between general image marketing and advertising that specifies a product. In the Consumer Agency's opinion the company was guilty of the same kind of advertising that was banned in decisions that were issued by the Market Court (MC:120/06) and the Supreme Court (SC:2007:37). These decisions also concerned advertising for Helsingin Sanomat.

The Market Court backed up its decision with a €100,000 conditional fine. Since the company took measures to correct the problem, the Consumer Agency did not petition for the fine to be levied.

The Consumer Agency also objected to a campaign in which Yhtyneet Kuvalehdet, a magazine publisher, placed advertising on buses.

Advertising for Tom & Jerry cartoon magazine was easily identifiable on the basis of colourful pictures showing characters and the magazine. Consumers received the impression that advertising concerned a particular magazine, so the price of the magazine should have been indicated. Nor could the company get around the obligation to supply price information by removing a text that said "order the magazine".

An ad for Suomen Kuvalehti magazine showed the name of the magazine together with slogans pointing to the target group - "the magazine for thinking people" and "thoughts on the move". In the Consumer Agency's opinion, anyone seeing the ad would most likely get the impression that it concerned a particular magazine, namely Suomen Kuvalehti. Consequently price information should have been indicated in the ad.

The Consumer Agency said that Yhtyneet Kuvalehdet was not required to indicate prices in another campaign in which advertising on buses asked readers to send e-mails telling the magazine about commendable acts they had witnessed. Although ads gave the name of the magazine (in the form of the e-mail address www.seura.fi) they did not give the impression that the main purpose was to advertise the magazine but rather to collect information about "heroes" on the magazine's website.

Read more
Current Issues on Consumer Law 2/2007: Supreme Court ruling on the indication of prices ends debate on image marketing
New solutions being sought for problems in rail services

The Finnish Consumer Agency and Finland's rail operator (VR) have discussed consumers' rights in the rail sector. In addition to delays the parties discussed issues regarding ticket prices and discounts.

According to established principles of consumer law, if a service does not conform to what has been agreed, the customer is entitled to a discount. The Railway Transport Act contains a provision concerning compensation for financial damages incurred by passengers as a result of delays. In practice, however, passengers have only been compensated for very long delays.

Citing the Railway Transport Act, VR has refused responsibility to provide passengers any other type of compensation. Only in a few cases has VR agreed to give passengers with season passes a partial refund after repeated delays.

The Consumer Complaint Board (now renamed the Consumer Dispute Board) issued a decision (02/45/1050) in which it referred to Chapter 8 of the Consumer Protection Act and said that passengers are also entitled to a discount or refund if rail services do not conform to what has been agreed.

The decision concerned a case in which a passenger had a season pass for a specific rail connection. The board thought passengers should get money back if delays are exceptional and repeated.

VR has rejected the board's decision, arguing that in the rail sector the Railway Transport Act takes precedence over the provisions in the Consumer Protection Act.

By way of comparison, the rail operator in Sweden (SJ) introduced a travel time guarantee in 2006. If a train is substantially late (for example over 40 minutes on a journey lasting 2 hours), the passenger is entitled to a refund in the form of a coupon that can be used to buy a new ticket. The system is voluntary and is not based on Sweden's Railways Act.

The Consumer Agency and VR also discussed issues related to ticket prices and discounts and the need to provide clear information on cancellation terms for e-tickets.

The Consumer Agency drew attention to VR's complicated pricing system, which with all its surcharges, discounts and exceptions is difficult for consumers to understand.

One problem is that consumers have sometimes received conflicting information from VR's own personnel regarding prices and discounts, for instance. The pricing system needs to be clarified and simplified.

In the rail sector the Consumer Agency has received the largest number of complaints about cancellation terms for e-tickets. On the basis of discussions VR has revised the instructions on its website and clarified terms concerning the ordering of an e-ticket with a text message.