



# Enforcement Notice:

## Advertising Botox and other botulinum toxin injections

### Who we are

We are the [Committee of Advertising Practice](#) (CAP). We write the advertising rules, which are enforced by the Advertising Standards Authority (ASA), the UK's independent advertising regulator. You can read about the UK advertising regulatory system [on the ASA website](#).

The [Medicines and Healthcare products Regulatory Agency](#) (MHRA) is the UK statutory regulator for medicines, medical devices and blood components for transfusion.

### Why are we contacting you?

We understand that businesses in your sector have advertised botulinum toxin injections on social media. Botulinum toxin injections – most commonly Botox, but also Vistabel, Dysport, Bocouture, and Azzalure – are prescription-only medicines (POMs).

POMs cannot be advertised to the public. Ads for POMs breach [Rule 12.12 of the CAP Code](#) and the [Human Medicines Regulations 2012](#) (HMRs). This applies even if the POM is administered by a registered medical professional.

Please take immediate action to review your social media ads and make changes as needed. **After Friday 31<sup>st</sup> January, we will take targeted enforcement action using monitoring technology to automatically find problem posts for removal.** This can include – where advertisers are unwilling to comply – referral to the MHRA or your professional regulatory body.

### Scope

This notice applies to all promotion of botulinum toxin injections to UK consumers on social media platforms. This includes paid-for ads, non-paid-for marketing posts on your or others' pages and influencer marketing. Ads that are aimed only at healthcare professionals are excluded from the rule (but we understand almost all ads/posts on social media could be seen by the public). This notice does not apply to non-POM products e.g. dermal fillers.

### Guidance

Take care not to directly or indirectly promote POMs to the public when promoting the treatment services you offer on social media.



**Remove** direct references to Botox or other POMs. This includes names such as “Beautytox” or “Beautox” where the obvious inference is a reference to Botox.

- **Remember** – this includes [references in images](#) and [hashtags e.g. #botox](#)
- **Also** – this covers all promotional marketing, like offering “Botox parties” or [“Botox treatment”](#) as a competition prize or in a sale package.



**Do not** substitute direct references to POMs with indirect phrases that can only refer to a POM such as “wrinkle relaxing injections”. This is [indirect promotion of a POM](#), and just as much of a problem.



**Be aware** the ASA considers that a reference to “anti-wrinkle injections” alongside a price that relates to a POM [will be seen as an ad for that POM](#) (also see below re “anti-wrinkle injections” claims)



**Avoid** references to treating medical conditions in a way that could indicate the promotion of a POM, for example [“injections for excessive sweating” \(hyperhidrosis\)](#). If you offer non-POM treatments, you could instead refer to “treatments for excessive sweating” or similar.



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### What if I administer POMs and non-POMs?

Non-POMs, such as dermal fillers, may be advertised provided there is no implication that a POM is also available.



**Be specific** and use terms such as “dermal fillers” or “cosmetic fillers” to be expressly clear that you are only advertising your non-POM “filler”.



**Do not** describe your non-POM product range in an ambiguous way. For instance, avoid juxtapositions such as “anti-wrinkle injections and dermal fillers” which would imply that the “injections” in question are POMs.

### What if I only administer POMs?

In short, POMs such as Botox cannot be advertised to the public. You should focus on aspects of your service which do not relate directly to the provision of a POM. You could:



**Promote** the service you provide and the consultation itself. Claims such as “a consultation for the treatment of lines and wrinkles” may be acceptable – but if using this approach you must be careful not to directly or indirectly advertise the POM.

## Appendix: Code rules, legislation and useful reading

This guidance should be read in conjunction with the [MHRA's The Blue Guide: Advertising and Promotion of Medicines in the UK](#) which explains the provisions and requirements laid down in the legislation on advertising medicines. Specifically, [Appendix 6](#) of the Blue Guide outlines the requirements for treatment service providers to help you ensure you don't break the law.

### Relevant [CAP Code](#) rules:



**12.12** Prescription-only medicines or prescription-only medical treatments may not be advertised to the public.

### Relevant legislation:



The [Human Medicines Regulations 2012](#) prohibit the publishing of an “advertisement that is likely to lead to the use of a prescription only medicine”, as laid out in Chapter 2, *Advertising to the public*, 284 (1).

**Want more?** See CAP's advice on: [Anti-ageing: Botulinum toxin products](#), [Hyperhidrosis](#) and [Healthcare: Prescription-only medicine](#)

Or contact the CAP [Copy Advice team](#), which offers a free and confidential bespoke pre-publication advice service