

# Complaint to TGA: Swisse Ultiboost Lecithin

## Acknowledgement:

This complaint was worked up by Monash University BMS3052 WAM Thursday 4pm Group 8; then edited and checked by Mal Vickers and submitted by Assoc Prof Ken Harvey.

## Summary:

Lecithin is a phospholipid found in egg yolks, soybeans, fish, organ meats, and other foods. It is the major dietary source of choline. Choline is an essential nutrient related to the water-soluble B-complex vitamins, folate, pyridoxine, and B12, and to the essential amino acid methionine. Although choline is essential, there appear to have been no reports of deficiency in the general population.

It is claimed that Swisse Ultiboost Lecithin is formulated based on scientific evidence to help detox, support a healthy liver, support healthy fat metabolism and assist in the maintenance of general health and well-being.

The "science" provided by Swisse listed 23 references; many were duplicated, only 12 were unique, all were poorly referenced. Most were books detailing that choline from lecithin is an essential nutrient; two were not related to lecithin or choline, but rather food standard codes. They provided no justification that supplementation with lecithin will benefit normal healthy people. Nor did our search of scientific literature.

The fundamental problem with the claims made by Swisse is that they extrapolate from the important role of choline in the body to implying that taking this product as a supplement will benefit normal healthy people. This is a common logical fallacy employed by the complementary medicine industry to mislead the public and arouse unwarranted expectations of product effectiveness.

Accordingly, we allege that advertisements for this product breach the Therapeutic Goods Advertising Code 2015: s.4(1)(b), 4(2)(a), 4(2)(c), 4(2)(d) and 4(4). Also s.6(3) Chemist Warehouse.

## Claims:

### *On the bottle's label:*

- Helps maintain liver health and liver function
- Support healthy fat metabolism
- Based on scientific evidence

### *On the Swisse website:*

- Detox
- Assists in the maintenance of general health and well-being
- Formulated based on scientific evidence to help support a healthy liver

**Advertisement type:** Internet

## Where did it appear:

- <https://swisse.com/en-au/products/vitamins-supplements/digestion-detox/swisse-ultiboost-lecithin>
- <https://www.chemistwarehouse.com.au/buy/74931/swisse-ultiboost-lecithin-1200mg-150-caps>
- <https://www.amcal.com.au/swisse-ultiboost-lecithin---150-capsules-p-9311770597463>
- <https://www.yourchemistshop.com.au/swisse-ultiboost-lecithin-1200mg-150-capsules-2.html>

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- <https://www.discountdrugstores.com.au/swisse-ultiboost-lecithin-1200mg-150-capsules-171427.html>
- <http://www.cincottachemist.com.au/swisse-ultiboost-lecithin-1200mg-capsules-150>
- <https://www.royyoungchemist.com.au/swisse-ultiboost-lecithin-1200mg-150-capsules-1.html>
- Etc.

Date seen: November 28, 2018

### Product:

**Swisse Ultiboost Lecithin; ARTG ID: 230082**

Sponsor: Swisse Wellness Pty Ltd

Active ingredients: Lecithin 1.2 g

ARTG Start Date 3/11/2014

### Screen shots:

HOME > SHOP > VITAMINS & SUPPLEMENTS > DIGESTION & DETOX > SWISSE ULTIBOOST LECITHIN

DIGESTION & DETOX

SWISSE ULTIBOOST LECITHIN

Swisse Ultiboost Lecithin is a premium quality support liver health and fat metabolism.

SIZE 1

FROM \$41.99<sup>RRP\*</sup>

\*Inc GST. Price may vary between retailers.

REGISTER TO UNLOCK 20% OFF RRP ON SWISSE.COM †

Already a member? [Login](#)

**Liver Health:** The liver is responsible for eliminating toxins, aiding digestion and to stimulate metabolism. Lecithin contains choline, which supports liver function and helps maintain a healthy liver.

**Fat Metabolism:** The choline in lecithin contributes to normal fat metabolism.

**Source of Phospholipids:** Lecithin is a source of phospholipids, important for the health and structure of cell membranes.

**General Wellbeing:** Assists in the maintenance of general health and wellbeing.

**Derived from Soybeans:** Naturally sourced from soybeans.

Swisse Ultiboost Lecithin has been formulated based on scientific evidence to help support a healthy liver.

<https://swisse.com/en-au/products/vitamins-supplements/digestion-detox/swisse-ultiboost-lecithin>



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**BETTER THAN  
1/2  
PRICE  
OFF RRP**

### Swisse Ultiboost Lecithin 1200mg 150 Caps

Product ID: 74931  
★★★★★ 5.0 (1) [Write a review](#)

# \$19.99

**SAVE \$22.00**  
Don't Pay RRP: \$41.99

QTY

 **ADD TO CART**

Swisse is currently undergoing a package refresh. Please [click here](#) for more information.

#### General Information

Swisse Ultiboost Lecithin is a premium quality formula to support liver health and fat metabolism.

**Metabolism:** The liver is responsible for eliminating toxins, aiding digestion and helping regulate metabolism. Lecithin contains choline, which supports liver function and helps maintain a healthy liver.

**Fat Metabolism:** The choline in lecithin contributes to normal fat metabolism.

**Source of Phospholipids:** Lecithin is a source of phospholipids, important for the health and structure of cell membranes.

**General Wellbeing:** Assists in the maintenance of general health and wellbeing.

**Derived from Soybeans:** Naturally sourced from soybeans.

Swisse Ultiboost Lecithin has been formulated based on scientific evidence to help support a healthy liver.

Size: 150 Pack

#### Ingredients

EACH CAPSULE CONTAINS:  
LECITHIN 1.2 g

#### Directions

**ADULT DOSAGE:**  
Five capsules daily, or as directed by a healthcare professional.

**STORAGE INSTRUCTIONS**  
Store below 25 degrees Celsius. Do not use if cap seal is broken.

<https://www.chemistwarehouse.com.au/buy/74931/swisse-ultiboost-lecithin-1200mg-150-caps>

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### Claims disputed and rationale:

It is claimed that Swisse Ultiboost Lecithin is formulated based on scientific evidence to help detox, support a healthy liver, support healthy fat metabolism and assist in the maintenance of general health and well-being.

First, the “detox” claim lack evidence and is a well-recognized scam.<sup>1,2,3</sup> It is appalling that the TGA has allowed five indication for “detox” in the Permissible Indications Determination No 1. of 2018.<sup>4</sup>

Second, the “science” provided by Swisse (illustrated above) listed 23 references; many were duplicated, only 12 references were unique, all were poorly referenced. Most were books detailing that choline from lecithin is an essential nutrient; two were not related to lecithin or choline, but rather food standard codes. They provided no justification that supplementation with lecithin will benefit normal healthy people. In addition, these references could not be readily accessed by consumers online.

Lecithin is a phospholipid found in egg yolks, soybeans, fish, meats, and other foods. It is the main dietary source of choline.<sup>5</sup> Choline is an essential nutrient related to the water-soluble B-complex vitamins, folate, pyridoxine, and B12, and to the essential amino acid methionine.<sup>6</sup>

Although choline is essential, there appear to have been no reports of deficiency in the general population.<sup>7</sup>

A literature search on conducted on MEDLINE, EMBASE and CENTRAL databases found only one small study on lecithin supplementation in health volunteers.<sup>8</sup> Cobb et al. (1980) found that the supplementation of soy lecithin for 28 days to a healthy diet failed to produce any significant changes in plasma cholesterol levels. These non-significant findings directly contradict the claims brought by Swisse regarding the contribution of lecithin supplementation to fat metabolism within individuals. This study was limited by the low number of participants (n=10) and high intake of lecithin supplementation (22.5g of lecithin per day). Swisse recommend taking 6g of lecithin per day.

We found no studies that investigated the effects of supplementation of lecithin on liver function in healthy participants.

***We allege these claims breaches the Therapeutic Good Advertising Code 2015, s.4(1)(b), 4(2)(a), 4(2)(c), 4(2)d) and 4(4). Also s.6(3) Chemist Warehouse.***

### Previous complaints:

We found numerous upheld complaints about other Swisse products on the TGACRP,<sup>9</sup> but none for this product. There was one 1999 justified complaint for another brand of Lecithin.<sup>10</sup>

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<sup>1</sup> <https://www.theguardian.com/lifeandstyle/2014/dec/05/detox-myth-health-diet-science-ignorance>

<sup>2</sup> <https://sciencebasedmedicine.org/the-detox-scam-how-to-spot-it-and-how-to-avoid-it/>

<sup>3</sup> <https://www.naturopathicdiaries.com/the-right-detox/>

<sup>4</sup> <https://www.legislation.gov.au/Details/F2018L00215>

<sup>5</sup> <https://naturalmedicines.therapeuticresearch.com/databases/food,-herbs-supplements/professional.aspx?productid=966>

<sup>6</sup> <https://naturalmedicines.therapeuticresearch.com/databases/food,-herbs-supplements/professional.aspx?productid=436>

<sup>7</sup> <https://www.nrv.gov.au/nutrients/choline>

<sup>8</sup> <https://www.ncbi.nlm.nih.gov/pubmed/7443101>

<sup>9</sup> [http://www.tgacrp.com.au/complaint-register/?\\_search=swisse](http://www.tgacrp.com.au/complaint-register/?_search=swisse)

<sup>10</sup> [http://www.tgacrp.com.au/complaint-register/?\\_search=lecithin](http://www.tgacrp.com.au/complaint-register/?_search=lecithin)

## Complaint to TGA: Swisse Ultiboost Lecithin

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