

# Facebook TF Report Submission #2 [20/11/2025]

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**Case Number: 20641881**

**Service:**

Facebook Core ▾

**Reporting Reason:**

Fraud & Deception ▾

**Please specify your reporting reason(s):**

The reported Facebook ad promotes the product “DIABETOL FORTE” with explicit claims that it can “prevent diabetes complications”, help users “regain their health”, “protect blood vessels, eyes, kidneys, heart and brain from sugar damage” and has “clinically proven efficacy” to improve glycaemic control and “see your blood sugar decrease in just 2–3 weeks”, while being “100% natural” and “safe even with long-term use (no hypoglycaemia)”. According to publicly available information in Greece, DIABETOL FORTE is marketed as a dietary supplement / food for special medical purposes, not as an authorised anti-diabetic medicinal product with EOF marketing authorisation.

The ad therefore presents a food supplement as a clinically proven diabetes treatment that prevents serious complications, in a way that is likely to mislead especially vulnerable consumers with diabetes into believing this is a safe, effective alternative or complement to medical treatment. The marketing omits the product’s true regulatory status (supplement, not medicine), offers no substantiation for the “clinically proven” claim, and encourages users to order via private messages without clear trader identity or basic pre-contract information. This combination of exaggerated therapeutic promises, misleading health claims and lack of transparency constitutes a misleading and unfair commercial practice targeting a chronic-disease group and creates a real risk to public health if patients delay, modify or abandon appropriate evidence-based care in reliance on this ad.

**Please attach the valid document related to your report:**

[\[Attached PDF\]](#)

**Please submit the URLs below (max 20):**

<https://www.facebook.com/ads/library/?id=2383235882118260>  
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[https://l.facebook.com/l.php?u=https%3A%2F%2Fnaturatherapy.gr%2Fdiabetol-forte-30-kaps-oyles-fytika-skeyasmata-gia-to-diabhth%3Ffbclid%3DlwZXh0bgNhZW0CMTAAYnJpZBExR0VxajZkSGwwb2lrR0I2MnNydGMGYXBwX2IkDzU0MTYzOTQ5Mzg4OTAyNQABHhcmvsJCMUqhWOMJOUpqllw8k7E8uyX2-Nrlnm9K4rClZ0OuKkU-z0kNx9\\_h\\_aem\\_O1bnCDOqNBuFP4LIKJg6Ow&h=AT1bhyx1i6xpLLD0qzIXPyn8plZpVaahwkrMkGgUQfAE40gIHyrSalx3xVgVBHcxYVHNKIPfib-wj5AqA5VNXiLX-b2B4mkeYvVcxfsM9p4S2GsJOms8PmFtiFfr4eWHCgUBw](https://l.facebook.com/l.php?u=https%3A%2F%2Fnaturatherapy.gr%2Fdiabetol-forte-30-kaps-oyles-fytika-skeyasmata-gia-to-diabhth%3Ffbclid%3DlwZXh0bgNhZW0CMTAAYnJpZBExR0VxajZkSGwwb2lrR0I2MnNydGMGYXBwX2IkDzU0MTYzOTQ5Mzg4OTAyNQABHqyFyVnrLZOaRlnwBLp5s8ikyAl15vmm-Teoxj4RxnLjFuduqPK-eUTS-ybH_aem_okV54ILF0eGH218MbwO9Tw&h=AT1bhyx1i6xpLLD0qzIXPyn8plZpVaahwkrMkGgUQfAE40gIHyrSalx3xVgVBHcxYVHNKIPfib-wj5AqA5VNXiLX-b2B4mkeYvVcxfsM9p4S2GsJOms8PmFtiFfr4eWHCgUBw)  
[https://naturatherapy.gr/diabetol-forte-30-kapsoyles-fytika-skeyasmata-gia-to-diabhth?fbclid=IwY2xjawOL9zdleHRuA2FibQlxMABicmlkETFHRXFqNmRlBDBvaWtHQjYyc3J0YwZhcHBfaWQPNTQxNjM5NDkzODg5MDI1AAEeTC7WBg8eYSE4a94CXlppQ3ykW6XUUZYP0yBs2QP9yLVr2Q32hw25Loul0A\\_aem\\_nO6lh8ugo906WdtqiXJkag](https://naturatherapy.gr/diabetol-forte-30-kapsoyles-fytika-skeyasmata-gia-to-diabhth?fbclid=IwY2xjawOL9zdleHRuA2FibQlxMABicmlkETFHRXFqNmRlBDBvaWtHQjYyc3J0YwZhcHBfaWQPNTQxNjM5NDkzODg5MDI1AAEeTC7WBg8eYSE4a94CXlppQ3ykW6XUUZYP0yBs2QP9yLVr2Q32hw25Loul0A_aem_nO6lh8ugo906WdtqiXJkag)  
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**Country:**

Greece

- Check here if you are reporting a beneficiary and/or payer of an advertisement under Digital Services Act
- There is an applicable legal order for this request

**Are you reporting unlawful content?**

- Yes
- No

**If you regard the reported content as unlawful, please detail what specific laws (i.e relevant legislative provisions) had allegedly been violated:**

### **1. Misleading and unfair commercial practices in health advertising (dietary supplement marketed as a diabetes “treatment”)**

Relevant laws: Greek Law 2251/1994 (Consumer Protection) – Arts. 9c, 9d, 9e, 9f; Greek Law 2251/1994, Art. 7 (Health and Safety of Consumers)

#### **1.1 Overall prohibition of unfair commercial practices**

Unfair commercial practices that distort or are likely to distort the economic behaviour of consumers before, during or after a transaction are prohibited.

**- Greek Law 2251/1994, Art. 9c(1)-(2).**

By presenting a supplement as a quasi-guaranteed solution to “prevent diabetes complications” and “see blood sugar fall in 2–3 weeks”, the ad is likely to materially distort the decisions of vulnerable consumers with a serious chronic illness (diabetes), who may purchase it as a treatment or prevention of complications.

#### **1.2 Misleading actions regarding main product characteristics and expected results**

A practice is misleading if it contains false information or otherwise deceives the average consumer about, inter alia:

- the existence or nature of the product,
- its main characteristics, including benefits, risks, expected results and essential characteristics of tests performed, and
- the nature and rights of the supplier (identity, status, approval).  
Such practices are unlawful if they cause or are likely to cause the consumer to take a transactional decision they would not otherwise have taken.

**- Greek Law 2251/1994, Art. 9d(1)(a),(b),(f).**

In this case, the ad:

- Misrepresents the nature and regulatory status of DIABETOL FORTE by implying a clinically proven anti-diabetic treatment capable of preventing complications to vital organs, although, as marketed in Greece, it is a food supplement/special medical purpose product, not a licensed medicine.

- Overstates benefits and expected results, promising visible reductions in blood sugar in “2–3 weeks” and protection of eyes, kidneys, heart, brain from sugar-related damage without providing specific, verifiable clinical evidence.
- Uses generic claims like “clinically proven efficacy” and “100% natural formula” which, in this context, create a false impression of medical endorsement and robust clinical validation.

These elements are likely to deceive diabetic patients regarding the efficacy, safety and status of the product and to influence their decision to purchase it as a treatment or prevention tool.

### **1.3 Misleading omissions – lack of essential information in an invitation to purchase**

A practice is misleading if it omits material information that the average consumer needs to make an informed decision, or if such information is provided in an unclear or ambiguous manner, especially in an invitation to purchase. Essential information includes:

- the identity and geographical address of the supplier,
- the main characteristics of the product,
- the total price and
- arrangements for payment and delivery.

**- Greek Law 2251/1994, Art. 9e(1)-(5).**

The Facebook ad functions as an invitation to purchase, yet it:

- Fails to clearly state the full identity, legal name and address of the trader/manufacturer.
- Does not clearly and prominently specify that DIABETOL FORTE is a dietary supplement, not an authorised medicinal product.
- Omits key information about contraindications, interactions, appropriate use, and limitations, which are material for diabetic patients assessing risk.

These omissions are material and likely to cause consumers to take transactional decisions (ordering via private messages) they would not otherwise take if they were fully informed.

### **1.4 Black-list misleading practices (always prohibited)**

Greek law explicitly bans, among others:

- claiming that a product is able to cure diseases, dysfunctions or malformations, and
- claiming that a product or supplier is endorsed, certified or licensed by a public or private entity when this is not the case, or in a way that does not comply with the conditions of such endorsement.

- **Greek Law 2251/1994, Art. 9f(κστ), 9f(d).**

By advertising a supplement as capable of preventing serious diabetes complications and implying “clinically proven” therapeutic action on blood sugar and organ protection, the ad enters the territory of disease-treatment and prevention claims which are always prohibited for ordinary consumer products and food supplements, unless they are properly authorised medicinal products.

### **1.5 Health and safety of consumers – high-risk targeting of a chronic-disease group**

Producers and distributors must only place safe products on the market and must not, through presentation and labelling, expose consumers to unjustified risks to their health and safety, taking into account vulnerable groups.

- **Greek Law 2251/1994, Art. 7(1)-(3),(7).**

Advertising a supplement as an effective way to control diabetes and prevent complications, without adequate warnings or a clear statement that it cannot replace medical treatment, exposes diabetic patients to potentially serious health risks (e.g. if they delay or alter prescribed therapy relying on these claims). This is incompatible with the duty to protect consumer health and safety, especially for vulnerable patients.

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## **2. Illegal offer and promotion of a non-authorised medicinal product (circumvention of medicinal-product authorisation rules)**

Relevant laws: Directive 2001/83/EC (Community code on medicinal products for human use); Greek Law 1316/1983 (EOF law), Art. 33; Greek Law 2251/1994, Art. 7

### **2.1 Classification as a “medicinal product by presentation”**

Under EU and Greek pharmaceutical law, a product is considered a medicinal product “by presentation” if it is presented as having properties for treating or preventing disease in human beings, regardless of its actual composition. In such a case it must obtain a marketing authorisation before being placed on the market or advertised to the public.

- **Directive 2001/83/EC (definition of medicinal product).**

The DIABETOL FORTE ad clearly presents the product as having therapeutic and preventive properties for a specific disease (diabetes), including promises to prevent complications and improve glycaemic control in a clinically proven way. This presentation is equivalent to advertising a medicinal product.

## **2.2 Prohibition of marketing and advertising non-authorized medicinal products**

Greek law on EOF (National Organisation for Medicines) penalises the placing on the market and promotion of medicinal products without valid marketing authorisation, or in breach of pharmaceutical legislation on manufacture, distribution and labelling.

- **Greek Law 1316/1983, Art. 33(1)-(2),(5),(6).**

There is no public indication that DIABETOL FORTE holds an EOF marketing authorisation as an anti-diabetic medicinal product in Greece. Marketing it through Facebook as a clinically proven treatment for diabetes and its complications, with claims equivalent to those of a drug, therefore amounts to:

- unlawful promotion of a non-authorized medicinal product, and
- de facto circumvention of the medicinal-product authorisation and pharmacovigilance system which is intended to protect public health.

## **3. Exploitative health-related deception and potential fraud against consumers with diabetes**

Relevant laws: Greek Law 4619/2019 (Penal Code), Art. 386 (Fraud); Greek Law 2251/1994 (Consumer Protection), Arts. 9c–9f

### **3.1 General fraud by misrepresentation for unlawful financial gain**

Fraud is committed when someone, with the intent to obtain unlawful financial benefit for themselves or another, knowingly presents false facts as true or unlawfully conceals true facts, thereby inducing another to act in a way that causes property damage.

- **Greek Law 4619/2019, Art. 386(1).**

In this context, there is a credible risk that:

- The advertiser overstates or fabricates therapeutic properties (prevention of serious complications, rapid and clinically proven blood sugar reduction) for DIABETOL FORTE, and
- Conceals its true status as a non-authorized medicinal product (a supplement with no demonstrated equivalence to standard treatments),

- with the intent of inducing diabetic patients to purchase the product, potentially at high prices, believing it is a clinically validated treatment.

If established, these elements match the pattern of fraudulent inducement of consumers based on false health claims, especially serious as the target group are people with a chronic, potentially life-threatening condition.

### **3.2 Unfair exploitation of vulnerable consumers**

Under consumer law, practices that materially distort the behaviour of a clearly identifiable vulnerable group (e.g. people with serious chronic illness) are assessed from the perspective of the average member of that group.

**- Greek Law 2251/1994, Art. 9c(3).**

By exploiting the fear of diabetes complications (damage to eyes, kidneys, heart, brain) and promising an easy, “natural” solution with “clinically proven” effectiveness, the ad targets a vulnerable group in a way that is likely to lead them to unsafe and economically harmful decisions, and can thus be characterised as both an unfair commercial practice and potentially fraudulent conduct.