Lu Lu Shi Ye Co., Ltd.

1763rd Commissioners' Meeting (2025)

Case: Lu Lu Shi Ye Co., Ltd. violated the Fair Trade Act by making false or misleading representations when selling filter products
Keyword(s): False; misleading; false or misleading advertising
Reference: Fair Trade Commission Decision of August 6, 2025 (the 1763rd Commissioners' Meeting); Disposition Kung Ch'u Tzu No. 114076
Industry: Intermediation Service Activities for Retail Sale (4870)
Relevant Law(s): Article 21 of the Fair Trade Act

Summary

1. A complaint filed by a citizen that Lu Lu Shi Ye Co., Ltd. (hereinafter referred to as "Lu Lu") made such claims on its website as "Market's Best-Selling Brand — Exclusive 99 Antibacterial Green," "The only company in the industry to voluntarily submit products for testing and certification by third-party institutions such as SGS," "Exclusive! Detachable External Pet Filter," "Exclusive Nano-Silver Antibacterial Technology," and "Exclusive Washable Pet Prefilter." Lu Lu also published a comparison table on its website claiming "only LG has it" under the "pet filter" comparison item for OEM products. These claims were suspected of constituting false or misleading advertising.

2. Findings of the FTC after investigation:
   Lu Lu was an aftermarket manufacturer of filters for air purifiers (dehumidifiers), and the aftermarket filters it sold were compatible with air purifiers (dehumidifiers) of major brands. There were numerous filter sellers on the market, and Lu Lu was only one of them. The filter products displayed on the website at issue included regular filters and pet filters, with the pet filters being installed in front of the regular filters.

3. Grounds for the disposition:
   (1) The website claimed "Market's Best-Selling Brand — Exclusive 99 Antibacterial Green." Lu Lu stated that "99 Antibacterial Green" was an exclusive filter product it had developed and manufactured and that the term "best-selling brand" referred to "99 Antibacterial Green."

However, Lu Lu was unable to provide any evidences showing that "99 Antibacterial Green" was the "market's best-selling brand." The FTC therefore found that the representation in advertising was inconsistent with the facts.

(2) The website claimed that Lu Lu was "The only company in the industry to voluntarily submit products for testing and certification by third-party institutions such as SGS." However, the websites for filters offered by other businesses also contained representations or displayed certificates concerning SGS testing. This was sufficient to establish that Lu Lu was not the only business that voluntarily submitted its products to SGS for testing.

(3) The website claimed "Exclusive! Detachable External Pet Filter," "Exclusive Nano-Silver Antibacterial Technology," and "Exclusive Washable Pet Pre-Filter." The FTC found that Lu Lu was unable to provide any evidences showing that the filters it sold exclusively featured nano-silver antibacterial technology or that its pet filters were washable and detachable exclusively. The FTC further found that filters of other brands available on the market also featured nano-silver antibacterial treatment and that other pet filters were also washable. Moreover, Lu Lu itself stated that LG's pet filters were also washable and detachable. Accordingly, the FTC found that the foregoing advertising claims were not substantiated.

(4) The website published a comparison table claiming "only LG has it" under the "Pet Filter" comparison item for OEM products. However, the FTC found that, in addition to LG, Philips also offered pet filters. Lu Lu did not dispute this fact, which was also supported by the relevant product webpage.

(5) Based on the reasoning mentioned above, the FTC determined that the above representations made by Lu Lu in relation to the sale of its filter products were false or misleading and therefore violated Article 21, Paragraph 1 of the Fair Trade Act.

(6) After assessing the motive and purpose behind Lu Lu's unlawful conduct, the inappropriate profit expected, the level of harm to trading order, the duration of the act, the profit obtained, as well as the business scale, management condition and market status of the offender, past violations, the corrections made, and cooperativeness throughout the investigation, the FTC cited the first section of Article 42 of the Fair Trade Act and imposed an administrative fine of NT$100,000 on Lu Lu.

Appendix:

Lu Lu Shi Ye Co., Ltd.'s Uniform Invoice Number: 83231864

Summarized by: Lee, Wan-Chun; Supervised by: Chen, Jen-Ying □