

## 1 Ofcom: Alcohol Advertising

- 1.1 The aim of IAS is to help promote policies for the reduction in the harm associated with the consumption of alcohol products, and it is from this perspective that we respond to the consultation.
- 1.2 We do not object to the changes proposed in regard to linking alcohol with anti-social or self-destructive behaviour; sexual content; irresponsible handling/serving of alcohol, and youth appeal. However, we believe that these changes should go further and be part of a broader package. We do not support the proposal to drop the rule prohibiting advertisements from showing people drinking in the workplace.

## 2 The nature of the argument

- 2.1 IAS supports an evidence-led approach to alcohol policy, and the issue of alcohol advertising should not be an exception. We are aware that the alcohol and advertising industries are attacking the proposals on the grounds that there is insufficient scientific evidence to prove a direct causal connection between alcohol advertising and levels of alcohol consumption or alcohol-related harm.
- 2.2 Our view, however, is that while there is at present no scientific proof that controls on the content of TV advertisements alone are likely directly to bring about reductions in either consumption or harm, there is a great deal of evidence to suggest that they might. This is a prime example of a case where an absence of proof should not be interpreted as proof of an absence of any adverse effect. As is noted in the consultation document, there are well known reasons why the effects of advertising are notoriously difficult to measure, and why, in particular, it is difficult if not impossible to isolate the effects of TV advertising from the effects of the wider marketing strategies of which the advertising forms an integral part.
- 2.3 Clearly, it is the whole marketing mix that matters and there is growing international evidence that marketing strategies do affect attitudes and expectancies, consumption levels and patterns, and consequent alcohol-related harm.<sup>1</sup> In the UK, a large part of the harm is generated by the widespread practice and social acceptance of 'binge drinking' that has become entrenched in youth culture, and which, as is well known, goes along with various forms of anti-social behaviour and risk-taking, including unsafe sexual activity.

| Age         | Feeling very drunk in last year <sup>2</sup> |         |
|-------------|--|---------|
|             | Males  | Females |
| 12-13 years | 8  | 7       |
| 14-15 years | 38   | 35      |
| 16-17 years | 68   | 57      |
| 18-21 years | 80   | 75      |

- 2.4 This culture of binge drinking starts young and constitutes an important part of the environment in which alcohol marketers have to operate and which they seek to influence. It is, presumably, part cause and part effect of the transformation of the UK alcohol market that has occurred over recent years, prompted in part by the social acceptability of recreational drug use which has necessitated a re-positioning of the alcohol industry in relation to the youth market. In this context, four important trends have been observed: the development of new ‘designer drinks’; an increase in the strength of alcohol products in direct competition with the illicit psychoactive drug market; the use of sophisticated advertising and branding techniques to establish alcohol products that find expression in youth culture and lifestyles; and the opening of new drinking outlets designed specifically for the youth sector.<sup>3</sup>
- 2.5 Given these developments, the precautionary principle should apply to controls on the content of TV advertisements. There may not be conclusive proof, but there is clearly a real danger that inappropriate advertising could exacerbate an already serious problem, and it is reasonable therefore to demand that the needs of public health, in its broadest sense, be given the benefit of the doubt. Given the scale of the problem,<sup>4</sup> to the extent that there is an issue of evidence, then the onus of proof should be on the alcohol producers and advertisers to establish that advertising which condones anti-social behaviour, which links alcohol with sexual activity, which condones irresponsible handling or serving of alcohol, and which appeals to young audiences will not make a bad situation even worse.
- 2.6 This is especially so as it is recognised that effective alcohol advertising increasingly operates at the symbolic, intuitive level of consciousness mainly by means of the manipulation of images<sup>5</sup>, and image advertising elicits an especially positive response from younger teenagers.<sup>6</sup> Attractive young adults are shown enjoying the lifestyles to which teenagers aspire.<sup>7</sup> Confirmation of the appeal of image advertising, whether or not it features images specifically related to under 18s is provided by the Hertfordshire review.<sup>8</sup> An additional finding also casts doubt on how effective the proposed changes are likely to be. This is that excessive drinking or drunkenness do not actually have to be depicted for them to be assumed by young viewers to be occurring.<sup>9</sup>

### **3 The Proposals**

For these reasons, we believe it would be simpler and more effective for Ofcom to take the approach of outlawing lifestyle alcohol advertising in general rather than seeking merely to alter the wording of the rules to deal with the four specific areas identified above. This sort of tampering inevitably leaves wide scope for differing interpretations and provides both incentive and opportunity for advertisers to find ingenious ways of pushing the rules to the limits or circumventing them. In relation to the changes proposed, what clear and uncontested meaning can be given to, for example, the terms ‘moderate drinking’; ‘healthy drinking’; ‘excessive consumption’, or ‘mature, adult pleasure’ ?

- 3.1 We would also urge Ofcom to consider the volume of alcohol advertising as well as its content. Arguably, the attitudes and behaviour of both children and adults are likely to be affected by the sheer number and repetition of alcohol advertisements as well as their content. In view of the historically high and still rising alcohol-related

casualty rate, this is an appropriate time to begin reducing the exposure of children and adolescents to alcohol advertising and promotion. This is, after all, an objective of both the WHO European Alcohol Action Plan and the Recommendation of the EU Council of Ministers, to both of which the UK is by virtue of its membership already theoretically committed.

- 3.2 In regard to advertisements depicting people drinking in the workplace, the disappearance of lifestyle advertising would presumably put an end to such advertising. Even with the present arrangements, however, it is difficult to see any convincing rationale for the change proposed.
- 3.3 Prompted by concerns over productivity as well as a number of disastrous accidents, the trend of recent years has been to discourage drinking during working hours and to remove alcohol from work environments, in a substantial number of which it is an offence to consume or to be under the influence of alcohol during working hours. Dropping this rule would clearly be a retrograde step for which it is difficult to see any justification at all.

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## References

- <sup>1</sup> Cook, Hastings & Anderson, *Desk Research to Examine the Influence of Marketing and Advertising by the Alcohol Industry on Young People's Alcohol Consumption* (March 2002)
- <sup>2</sup> Home Office Research Findings No. 125: Underage drinking: Findings from the 1998-99 Youth Lifestyles Survey, Harrington V (2000)
- <sup>3</sup> Hastings G, *Marketing Alcoholic Beverages to Young People*, WHO Young People and Alcohol Conference, Stockholm, February 2001
- <sup>4</sup> Prime Minister's Strategy Unit, *Alcohol Harm Reduction Strategy*, 2004
- <sup>5</sup> Babor T et al, *Alcohol: No ordinary commodity, research and public policy*, p.177 (OUP 2003)
- <sup>6</sup> Covell K *The appeal of image advertisements: Age, gender and product differences*. Journal of Early Adolescence, Vol. 12, 1992 and Covell K et al *Gender differences in evaluation of tobacco and alcohol advertisements*, Canadian Journal of Behavioural Sciences, Vol. 26, 1994; Kelly K & Edwards R, *Image advertisements for alcohol products: Is their appeal associated with adolescents' intention to consume alcohol?* Adolescence, Vol. 33 1998 [quoted in Babor T et al, *Alcohol: No ordinary commodity, research and public policy*, p.177 (OUP 2003) ]
- <sup>7</sup> Hill L & Casswell S, *Alcohol advertising and sponsorship: Commercial freedom or control in the public interest?* In: Heather NP, Peters TJ and Sockwell T (eds) *International Handbook on Alcohol Dependence and Related Problems*, pp 821-846, (Wiley 2001)
- <sup>8</sup> Ofcom Alcohol and Advertising consultation, *Academic reviews of the research literature, Annex 5b, University of Hertfordshire*
- <sup>9</sup> Atkin C et al *The role of alcohol advertising in excessive and hazardous drinking*, Journal of Drug Education, Vol. 13, pp 313-323, 1983; Wyllie A, *Love the ads – love the beer: Young people's responses to televised alcohol advertising (Doctoral Thesis)*. Auckland: Alcohol and Public research Unit, University of Auckland (1997) [quoted in Babor T et al, *Alcohol: No ordinary commodity, research and public policy*, p.177 (OUP 2003) ]