New media, new problem?
Alcohol, young people and the internet

Alcohol Concern
Making Sense of Alcohol
**Alcohol Concern**
Alcohol Concern is the national agency on alcohol misuse campaigning for effective alcohol policy and improved services for people whose lives are affected by alcohol-related problems.

**Our work in Wales**
Alcohol Concern opened its office in Cardiff in 2009. Alcohol Concern Cymru is focusing on policy and public health in Wales, acting as a champion for alcohol harm reduction.

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Alcohol marketing on the internet is growing rapidly, with the alcohol industry utilizing a range of new and interactive techniques to reach existing and new customers. Of particular concern is the presence of alcohol companies on Social Networking Sites (SNSs) like Facebook and Twitter, and video sharing sites such as YouTube, given that huge numbers of children and young people use these sites on a regular basis, and are consequently at risk of exposure to marketing intended for adults.

Likewise, alcohol brand websites often include features such as interactive games, competitions and videos that may appeal to minors. Yet, age verification mechanisms designed to restrict access on SNSs and brand websites to adults only are largely ineffective, as all is required is entering a fictitious date of birth in order to bypass them.

The boundaries between official marketing and unofficial user-generated content are also becoming increasingly blurred. Many alcohol producers have an official page on Facebook, for example, where registered users are able to post comments, often in support of a particular brand. But there are also many more user-generated pages that ‘mirror’ these official pages, where members interacting via postings in effect become unofficial ‘ambassadors’, positively promoting the brand, whether intentionally or otherwise.

SNSs have become a place where consumers of all ages discuss and share images of their alcohol consumption. It is now common to document parties and nights out on SNSs, posting images and accounts of heavy consumption and the virtues of drinking. Teenagers, in particular, openly present themselves as able to consume large volumes of alcohol and are keen to be seen by their peers as ‘drinkers’. The cumulative effect of this is a contribution to the ‘normalisation’ of alcohol consumption, influencing our perceptions of what constitutes acceptable drinking behaviour.

This report considers the increasingly prominent role that the internet plays as a means of promoting alcohol use, and makes the following specific recommendations:

**Recommendation 1**

Given their strong appeal to young people, official alcohol marketing should not be permitted on social networking sites.

**Recommendation 2**

Steps should be taken by alcohol producers and the administrators of social networking sites to end the unauthorised use of registered drinks trademarks, logos and advertising images on such websites, where they may be mistaken for official marketing. Administrators of social networking sites should also issue clearer guidelines about users posting content that may endorse or encourage irresponsible drinking.
Recommendation 3

Age affirmation pages are ineffective as a means of restricting young people’s access to websites containing alcohol-related content intended for adults. Further investigation is required into finding better ways of restricting access. In the meantime, alcohol brand websites in particular should restrict content to factual information about products.

Recommendation 4

Health bodies need to counter official alcohol marketing and pro-drinking messages on the internet by fully embracing and utilising new media themselves as a means to promote alcohol-related health messages.
Social Networking Sites (SNSs) like Facebook, Bebo and MySpace are hugely popular in the UK, with one in every four and a half minutes spent online in the UK accounted for by social networks and blogs. Facebook is the most popular of these sites, with more than 500 million registered users worldwide, 30 million of whom are based in the UK.

Interactive digital communication methods that use the internet, such as SNSs, podcasts, blogs, tweets, video sharing, and mobile phone devices, are often referred to as ‘new media’, and their advantages as an innovative means of reaching a diverse range of audiences has not gone unnoticed by marketing companies. More specifically, the alcohol industry has been quick to recognise the potential of reaching consumers through such platforms. Leading brands in the UK such as Fosters, WKD and Carling each have their own interactive websites and a presence on Facebook and/or Twitter. The volume of online alcohol adverts in the UK almost doubled between 2007 and 2008, and it has been reported that, in 2009, online advertising expenditure overtook television expenditure in the UK for the first time.

The internet offers an important new media environment that is especially appealing to children and young people. Research from Ofcom has shown that almost half (49%) of children aged 8-17 years who use the internet have set up their own profile on an SNS. Indeed, despite the fact that the minimum age for most SNSs is typically 13 years, 27% of 8-11 year olds who are aware of such sites state that they have a user profile.

The popularity of such social media, whereby users are able to create detailed personalised pages listing their interests, post updates about their status, share their photos and videos, communicate with other users with comparable interests, and link to other online sites, has implications from an alcohol misuse perspective. First, the large presence of alcohol companies on such sites means an increased likelihood of exposure by children and young people to alcohol marketing. It has previously been shown how this age group is particularly susceptible to alcohol marketing, especially those who are already showing signs of alcohol-related problems, shaping their attitudes and expectations about drinking.

Secondly, analyses of SNSs reveal a huge volume of user-generated pro-drinking references and images relating to alcohol consumption and drunkenness, the majority of which are accessible by SNS users under the legal drinking age. It is increasingly common, for example, to document parties and nights out on SNSs, posting images and videos, and detailing accounts of heavy drinking. The digital environment thus provides a platform whereby the supposed virtues of drinking are regularly communicated by peers, leading to the further normalisation of (excessive) alcohol consumption. In other words, the more people are exposed to images and messages of heavy drinking, the more normal and acceptable this behaviour appears. Again, this has particular implications concerning children and young people, the next generation of potential drinkers.

This report examines the increasingly prominent role that alcohol plays in new media, highlighting findings from recent research undertaken in this area, as well as from Alcohol Concern’s consultation with young people, and makes recommendations for action.
Online social networking has become a global phenomenon and is now hugely popular in the UK, particularly amongst young people, with 86% of 18-24 year olds in the UK saying they use the internet for social networking. SNSs have been defined as:

“...online communities of people who share interests and activities, or who are interested in exploring the interests and activities of others. They typically provide a variety of ways for users to interact, through chat, messaging and email.”

More specifically, sites such as Facebook create an environment whereby members can share information about themselves and their activities, and communicate with others, sharing photos and videos, joining groups to connect with people with similar interests, and chat via instant messaging with online contacts called ‘friends’.

It is estimated that internet users in the UK spend almost a quarter of their time online on SNSs, most users checking their personal profile at least every other day. The majority of these sites also have mobile-friendly versions, and 20% of the time younger adults spend on social networking is actually via a mobile device.

Uploading and viewing videos online is another example of new media, part of a new trend of internet use known as Web 2.0, and again is an increasingly popular pastime amongst young people. YouTube (see more below) is the most well-known of online video websites, and users of SNSs are able to embed videos found here onto their profile pages or forward them to friends, allowing popular videos to go ‘viral’.

‘Immersive digital environments’, which encompass interactive games and three-dimensional virtual worlds that users inhabit and interact in, also have huge appeal to young people, and marketing companies have actively used ‘dynamic product placement’ to incorporate adverts into game storylines, for example, amending and updating messages tailored to the individual user.

Clearly, online media is developing quickly, offering increasingly diverse and sophisticated technology that is particularly attractive to young people, and consequently providing specific new challenges to the protection of public health. This has particular relevance to the alcohol field and is explored in more detail below.

"The tremendous growth and popularity of these sites among even younger users means that they cannot be ignored by those interested in the health of young people... Dismissing these new technologies as being merely ‘for the kids’ ignores the enormous health-relevant content and traffic already occurring on these sites."

B. Freeman and S. Chapman, 2008

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**The most popular Social Networking Sites in the UK**

<table>
<thead>
<tr>
<th>Website</th>
<th>UK online audience penetration (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facebook</td>
<td>64.74</td>
</tr>
<tr>
<td>Bebo</td>
<td>23.19</td>
</tr>
<tr>
<td>Windows Live Profile</td>
<td>18.70</td>
</tr>
<tr>
<td>MySpace</td>
<td>17.72</td>
</tr>
<tr>
<td>Twitter</td>
<td>7.24</td>
</tr>
<tr>
<td>Digg</td>
<td>4.77</td>
</tr>
<tr>
<td>Friends Reunited</td>
<td>4.42</td>
</tr>
<tr>
<td>Tagged</td>
<td>4.41</td>
</tr>
</tbody>
</table>
"If we are to develop timely and appropriate strategies to address concerns about underage drinking – and the use of alcoholic products by society generally – it is critically important that we understand the dimensions and implications of the new marketing paradigm."

J. Chester et al., 2010

Alcohol companies are increasingly promoting their drinks across the diverse spectrum of online platforms outlined in the previous section, increasing their web expenditure by 70% for example in 2007 and thereby extending their influence beyond traditional advertising outlets.

Despite this increased expenditure, one of the key advantages of new media is the potentially low costs and resources involved for alcohol advertisers in reaching large audiences. This is no more clearly highlighted than through the concept of ‘viral marketing’. Viral marketing is a form of advertising which targets consumers who are likely to pass on brand-related messages to other potential consumers via multiple media platforms, including emails, SNSs, text messaging and online forums. This may entail simply signing up to a brand newsletter and forwarding it to ‘friends’, or something more sophisticated: Grolsch have run a ‘Do you believe in coincidence?’ campaign, which combined viral video with text messaging. Visitors to the campaign website, having submitted their mobile phone number, viewed a short video of two men drinking at a bar; midway through the video, one of the men begins text messaging, turns to the camera and asks ‘do you believe in coincidence?’. Moments later, the viewer received a text message with a web page link to enter friends’ mobile numbers and email addresses so that they too can view the brand’s video.

The boundaries between what actually constitutes online alcohol advertising and what constitutes social interaction are, in addition, becoming increasingly hazy. Marketing is now “fully integrated into daily communications and social relationships, not cordoned off in a special category of ‘advertising’.” Most alcohol producers have an official page on Facebook, for example, where individual users are able to post comments, often in support of the particular brand; but there are also many more user-generated pages that ‘mirror’ these official pages, communities where members can regularly interact online with fellow members, and in effect, inadvertently become unofficial ambassadors, positively promoting the brand via their postings, whether intentionally or otherwise.

“...the line between corporate advertising and user-generated content is almost completely blurred. This lack of clarity regarding who’s doing what creates monumental challenges in regulating content.”

S. Mart et al., 2009

It is therefore important that any discussion of alcohol and online media should go beyond traditional ideas about alcohol marketing, and whether the relevant online advertising regulations are being adhered to or are restrictive enough. There is a much broader issue regarding the sheer volume of pro-drinking images and messages that are regularly uploaded to these sites, and viewed by people often below the legal drinking age, and how these contribute to the normalisation of heavy drinking.
Whilst research into SNSs and other online media is still in its infancy,\textsuperscript{27, 28} there is a small, growing body of work examining how young people in particular engage with alcohol and (re)produce alcohol marketing messages online. Some of these findings are outlined below, illustrated with further examples from Alcohol Concern’s own research, focusing on three particular platforms: SNSs (specifically, Facebook, Bebo, MySpace and Twitter), online video websites (YouTube) and selected alcohol brand websites.

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{image1.png}
\caption{Box 1: Current online advertising regulations}
\end{figure}

Since 1 March 2011, marketing communications on alcohol companies websites and in other third party space under their control, such as Twitter and Facebook pages, have to adhere to the non-broadcast advertising rules as set out in the Committee of Advertising Practice (CAP) Code.\textsuperscript{26} There are 17 rules which directly relate to alcohol, a selection of the key ones is set out below.

Marketing communications:

- Must be socially responsible and must contain nothing that is likely to lead people to adopt styles of drinking that are unwise. For example, they should not encourage excessive drinking. Care should be taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- Must neither link alcohol with seduction, sexual activity or sexual success nor imply that alcohol can enhance attractiveness.
- Must not be likely to appeal particularly to people under 18, especially by reflecting or being associated with youth culture. They should not feature or portray real or fictitious characters who are likely to appeal particularly to people under 18 in a way that might encourage the young to drink. People shown drinking or playing a significant role should not be shown behaving in an adolescent or juvenile manner.
- Must not be directed at people under 18 through the selection of media or the context in which they appear. No medium should be used to advertise alcoholic drinks if more than 25% of its audience is under 18 years of age.
Social networking sites
As outlined in the previous section, interacting on SNSs is an increasingly common way of spending time online, particularly amongst young people, updating personal profiles and browsing through numerous other profiles to make connections with old friends and find new acquaintances.

The presence and impact of alcohol-related content on these sites are a growing cause for concern, and several recent studies have examined the issue in greater depth. A qualitative study undertaken in 2009 by Sarah Mart et al on behalf of the Marin Institute, a US-based alcohol industry watchdog, focused specifically on alcohol advertising on Facebook. It examined the Facebook pages of leading beer and spirits brands, as well as user-generated pages located through searching on unbranded terms such as “alcohol”, “binge” and “shots”, and found an abundance of alcohol-related content, via paid banner adverts, applications (quizzes and games, for example), individual pages and group pages. Much of this content promoting alcohol was accessible to users below the legal drinking age. In particular:

- Only 50 per cent of pages reviewed restricted access based on age, meaning that registered users of all ages could become fans, view images of individuals consuming alcohol, post and read comments, and receive updates.
- Applications advertised alcohol with specific brand names, photos, graphics, descriptive content including excessive drinking behaviour, and links to alcohol brand websites. None of these applications were age restricted.
- The group pages reviewed advertised alcohol with specific product photos, hyperlinks to brand websites, and applications, again with no age restrictions.

The study also noted the ability of registered users to create their own pages dedicated to a particular alcohol brand, and such pages often are very similar in appearance to the official pages. For the purposes of this report, Alcohol Concern created a profile with a fictitious name and birth date which would make the user under 18. Whilst logged in as this user, we were unable to visit the official Facebook page of a randomly selected alcohol brand, namely Smirnoff Ice. However, entering ‘Smirnoff Ice’ in Facebook’s search engine produced numerous user-generated pages which could easily be mistaken as its official page.

Alcohol companies are responsible for the content that appears on their own pages, but this does not extend to other user-generated website content. The Portman Group, the trade group established by the UK’s leading drinks producers to encourage responsible alcohol marketing, does advise companies to take reasonable steps to prevent their brand names, trademarks and logos from being used by third parties in a manner which violates agreed guidelines, but it is questionable to what extent this happens in practice.

Another popular SNS is Twitter, whereby registered users are able to micro-blog: send short messages (‘tweets’) of up to 140 characters. The purpose of Twitter is to allow individuals and companies to post quick updates on their latest activities, share websites and interact with others, via their computer and/or mobile phone. Many of the major alcohol companies in the UK have already established themselves on Twitter and utilised its features. Diageo, which describes itself as the world’s leading premium drinks business, has used Twitter for cross-media marketing such as Smirnoff’s ‘Be there’ campaign in 2009, whereby users could submit suggestions about how they could turn an ordinary idea into something extraordinary.
Whilst the content of brand websites is restricted to adults (see more below) there is no definitive age restriction to register as a user on Twitter (Twitter states its services “are not directed to people under 13”). Alcohol brands sometimes have a message at the top of their Twitter profile stating an individual must be over 18 to follow. However, given there is no requirement to submit a birth date when registering on Twitter, there is also nothing to prevent a child or teenager from following the company or brand should they wish to. Moreover, there is no requirement to register at all in order to simply view the vast majority of tweets. Thus visitors of any age to the Fosters UK official Twitter page can find direct online links to its latest advertising campaign. Likewise, visitors to the Magners UK page can find comments such as “Have you played our new Catch ‘n’ Crush game? Be in with a chance of winning 1 of 3 iPad 2s. Click to play”, which Alcohol Concern found when conducting its research.

The sheer volume of alcohol references found in users’ profiles on social networking sites, not just relating to particular brands but drinking behaviours more generally, has been highlighted in a study from New Zealand in 2010. This research examined approximately 150 Bebo web pages created by registered users aged 16-18, by way of textual analysis and cyberspace ethnography. It found teenagers openly presenting themselves as able to consume significant amounts of alcohol, wishing to see themselves as ‘drunks’ and keen to be seen by their peers as having a connection with specific alcohol brands, demonstrated through comments on personal profiles, uploaded digital photographs showing themselves and their friends drinking alcohol, and their responses to online quizzes asking individuals about their consumption levels. The authors argue that young people who share these photographs and information about their alcohol consumption in an SNS environment are “...generating a form of group identity among their social circle through their active participation in drinking culture”.

A content analysis was also undertaken in the USA of public MySpace profiles of self-reported 17-20 year olds in 2010. Again, the research found explicit alcohol use being frequently referenced. Of the 400 profiles examined, over half contained references to alcohol use, comprising of photographs depicting the profile owner drinking alcohol or text statements such as “I love drinking beer” and “I was so loaded on Friday”. Statements also indicated motivations for drinking, for example “I like to get drunk, if you like Vodka then you are my friend” and contrasting emotional and social consequences, for example “A glass of wine and I’m just fine” and “I’m embarrassed that I drunk Bailey’s out of a shoe”. The fact that these were public profiles meant that any registered user would be able to view their content and potentially make contact with the profile owner.
New media, new problem?

Online video websites

YouTube is ranked overall as the world’s third most popular internet site, and is the best known of the online video websites. It is a free service which hosts user-generated videos and, increasingly, clips from television, movies, sporting events and music. Its greatest proportion of visitors in the USA is from 12-17 year olds, with this age group being 1.5 times more likely than the average web user to visit the site; it is likely that demographic figures in the UK are similar.

Alcohol producers have established their own YouTube pages. Fosters, for example, has its own YouTube pages hosting episodes from shows broadcast on its fostersfunny.co.uk website, as well as a selection of its recent television adverts. Viewers do not need to be registered users to watch these and other alcohol adverts, and therefore young children are able to view these relatively easily should they wish to, and seemingly without restrictions.

Box 2: Selected SNS alcohol advertising guidelines

Facebook
Facebook’s own alcohol advertising guidelines are similar to those in the CAP code outlined in Box 1. In particular, alcohol adverts must not include content that is intended to appeal to anyone younger than the permissible targeted age group or is otherwise associated with youth culture, or portray people consuming or encourage people to consume alcohol rapidly, in excess or irresponsibly. Pages showing alcohol advertising must be age-gated, meaning that users registered as under 18 are unable to view them. The full guidelines can be found at http://www.facebook.com/ad_guidelines.php

Bebo
Alcohol adverts are not permitted on Bebo without its prior written consent.

MySpace
MySpace editorial guidelines prohibit adverts that promote “the sale or branding of hard alcohol and liquor (however, we permit the promotion of the sale of beer, wine and champagne)”. 
Video websites such as YouTube have also meant that previously-aired alcohol television adverts, which may not satisfy today’s broadcasting codes, have gained a new lease of life; a search on YouTube of “Carling Black Label” and “Tetley’s Bitter” for example produces adverts for the brands from the 1980s and the early 1990s. Recent and more detailed research identified similar examples, including adverts for Smirnoff Ice featuring the character ‘Uri’, despite these adverts being banned by the Advertising Standards Agency due to their youth appeal.

There are also numerous examples of registered users of the site uploading their own videos where they have filmed themselves and/or others recreating television adverts, particularly those for brands popular with young people. One uploaded video shows two girls recreating the ‘Lambrini dance’ at a bus shelter. This has received over 12,000 hits and, according to YouTube’s own statistics, is popular with female users aged 13-17. Similarly a user’s video inspired by WKD’s ‘have you got a WKD side?’ adverts has over 11,000 hits and again is particularly popular with females aged 13-17. The video even incorporates footage from the official WKD adverts.

In addition, a simple search on YouTube of key words relating to intoxication produces thousands of video results, many of which are of individuals posting videos of their own alcohol consumption. A search of key words such as “me drunk” brings up a variety of user-generated videos showing people in various states of intoxication. The first video in the search results for the above term has received 2,925 views, and selected posted comments from registered users include “…filming yourself while being drunk is awesome…” and “what does it feel like? cause i’m only 13”. Meanwhile, “the ultimate drunk people compilation video ever” has received over 39 million views.
Whilst YouTube community guidelines\textsuperscript{52} indicate that it imposes restrictions on certain types of video content, there is no reference in these guidelines to images of underage drinking, and a search of “drunk and underage” brings up numerous videos showing such footage.\textsuperscript{53} Users are able to flag videos as inappropriate, which if upheld following a review by YouTube staff, may either be removed or restricted to registered users. However, the registration process relies on users to input an accurate date of birth, and therefore the risks of children still viewing this material is, arguably, still very high. It should be noted that none of the videos viewed and referenced in this section required registration as a user.

**Brand websites**

Given the rapid growth on the internet as a means to market products, it is not surprising that many alcohol brand websites have emerged. Each of the most popular drinks brands amongst young people aged 11-17 in the UK, namely Fosters, WKD, Carling, Budweiser, Carlsberg, Bacardi and Smirnoff,\textsuperscript{54} have a dedicated website.

Such websites typically encompass much more than messages about the product. Carling’s website,\textsuperscript{55} for example, enables visitors to watch music videos via YouTube and listen to songs on MySpace, buy tickets to music concerts, sign up to Carling’s monthly newsletter, read daily football news, take part in competitions with prizes including football tickets and crates of lager, plus a search facility to find local pubs and bars.
To date, only limited research has been undertaken examining alcohol brand websites, however these individual studies have produced similar findings. The Center on Alcohol Marketing and Youth in the USA, for example, undertook an audit of 74 web sites operated by alcohol companies and found "widespread use of the kinds of features... potentially attractive to underage youth". In 2010, the University of Stirling and The Open University examined four popular alcohol brand websites and found interactive quizzes and games, wallpapers and screensavers, drinks recipes downloadable to mobile phones, and other branded materials which users are invited to circulate through their social networks.

Likewise, another snapshot study in 2010 found similar examples of website content that could appeal to underage people. The author also questioned whether such content would break rules that are currently applied to traditional alcohol advertising. For example, television advertisements must not link drinking with driving or be associated with youth culture, yet Budweiser, VK Vodka and WKD websites were each found to have interactive car games.
Previous research has also shown that alcohol brand websites are easily located by young people from search engines through non-alcohol specific terms such as “games”, “music contests” and “free screensavers”.63

The Portman Group advises that companies are “strongly encouraged” to require visitors to a brand website to navigate an age affirmation page (AAP) before being allowed entry to the site.64 This involves the visitor actively inputting their date of birth. If a date of birth is selected which would mean that the visitor is less than 18 years of age, an appropriate message should be given and/or directed to an appropriate alternative site, namely drinkaware.co.uk.65

Alcohol Concern visited the websites of the most popular brands for the 11-17 age group, according to the Advertising Standards Agency,66 and entered a birth date of 01/01/2000 (i.e. under the legal drinking age) on each site. The findings are presented in Table 2 below.

The failings of age affirmation pages on alcohol brand websites are obvious. In particular there is nothing preventing a visitor from entering a fictitious birth date. If visitors do enter a date of birth which indicates that they are less than 18 years old, on many websites they can simply try again by entering a new date. Even where visitors have been redirected to a responsible drinking website, pressing the ‘back’ button on their browser will return them to the landing page where they can submit a new date should they wish to. In an Alcohol Concern survey of 2,484 young people in 2011, 80% of respondents stated that age affirmation pages are inadequate to prevent under-18s from accessing alcohol websites.67

### Table 2: Age affirmation pages of alcohol brand websites

<table>
<thead>
<tr>
<th>Website</th>
<th>Message</th>
<th>Redirected to drinkaware.co.uk or equivalent website?</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="http://www.bacardi.com">www.bacardi.com</a></td>
<td>To experience this site you must be at least 18 years of age.</td>
<td>Yes</td>
</tr>
<tr>
<td><a href="http://www.budweiser.co.uk">www.budweiser.co.uk</a></td>
<td>You must be at least 18 years of age to experience this site.</td>
<td>Yes</td>
</tr>
<tr>
<td><a href="http://www.carling.com">www.carling.com</a></td>
<td>Users of this site must be over the legal drinking age.</td>
<td>Yes</td>
</tr>
<tr>
<td><a href="http://www.carlsberg.co.uk">www.carlsberg.co.uk</a></td>
<td>You are not of legal drinking age.</td>
<td>No</td>
</tr>
<tr>
<td><a href="http://www.fosters.co.uk">www.fosters.co.uk</a></td>
<td>You must be 18 years old or older to enter.</td>
<td>No</td>
</tr>
<tr>
<td><a href="http://www.smirnoff.com">www.smirnoff.com</a></td>
<td>Sorry we can’t let you in. Due to legal restrictions in your country or because you are not of legal purchase age we cannot allow you to access the site.</td>
<td>Yes</td>
</tr>
</tbody>
</table>
It is also highly questionable whether a message advising visitors that they are not allowed to enter the site because of their age is effective, particularly on websites which describe entering such sites as an “experience”. It is well-established that children often aspire to be adults, and many older children regard themselves as adults already; therefore, warnings that such sites are adult-only are unlikely to act as a deterrent, and may even encourage more young people to attempt to access them.

**Box 3: The inadequacy of age affirmation pages**

Below is an extract from an exchange between Dr. Howard Stoate MP and Nick Gill, a representative of Five by Five, an electronic media marketing company, as part of the House of Commons Health Select Committee’s report on alcohol published in 2010:

**Dr Stoate:** I have just entered the WKD site with a fake date of birth, 29 February, on a year that was not a leap year, and I am into it without any trouble at all. Admittedly it is a bit slow, because 3G is not working very well in this room, but I am onto the website with no trouble, and it did not ask me any other details. A fictitious date of birth which did not actually exist and I am on your website no trouble at all. I can go onto all these things: the shop, the arcade, download Kev and Dave, the newsletter. It is not a problem. It did not give me much confidence, and if I had actually been only 12, I would have had no trouble at all getting onto this: it took me a minute.

**Mr Gill:** Yes, but the age verification process is the accepted standard in the industry.

**Dr Stoate:** It is not very effective then, is it? I asked you if it was too lax. I do not think that is very effective.

**Mr Gill:** If there was a more effective way of doing it, then we as an industry, and not just the alcohol industry, would be employing that. At the moment that is collectively what we believe is the most effective method of doing it.

**Dr Stoate:** I am not impressed, Chairman.
In May 2011, Alcohol Concern Cymru commissioned an independent market research consultancy to consult with a small group of young people aged 16 and 17 to determine how they view alcohol on the internet, with specific reference to SNSs and brand websites. One group discussion, comprising ten young people, was conducted in Prestatyn, north Wales on 1 June 2011, followed by in-depth interviews conducted with an additional five young people on 5 June 2011.

Drinking experiences
Before exploring the issue of alcohol and the internet in depth, a brief discussion centred around young people’s drinking. Alcohol consumption was an integral part of the young people’s social lives, felt to enhance their mood and give them extra confidence in the company of their peers.

Choice of drinks for consumption was influenced by affordability, with young people more cost-conscious than brand-conscious.

“It depends how much money you’ve got which alcohol you can get, if you have only got three quid then you get cider.”

Box 4: A summary of some of the key findings from our focus group and interviews

- For the young people surveyed, alcohol consumption and Facebook usage were both intrinsic parts of their everyday lives. It is perhaps inevitable, therefore, that SNS users enjoyed documenting their own drinking experiences and reading about the drink-fuelled exploits of others.
- For the majority, the motivation for posting images and statements referencing their drinking was the attention it creates whilst also establishing their position as one of the ‘in-crowd’.
- All respondents stated they currently drank on a regular basis, and considered this to be normal behaviour for their age group. Non-drinking friends were considered to be a small minority. Widespread drinking-inspired images and postings on SNSs reinforced these perceptions of the social norms for this age group.
- None of the young people consulted have previously accessed brand websites and were not inclined to do so in the future. Similarly, the majority of respondents did not visit alcohol brand sites on Facebook, and the minority who have come across such pages previously had devoted little time to them.
- As only a small minority had encountered age affirmation pages as a method of deterring young visitors, the conversation around this was largely hypothetical. However, none of those questioned indicated they would have any difficulty circumventing such barriers if they so wished.
Cost-conscious youngsters were also aware of emerging off-license alcohol retailers such as Home Bargains, where young people bought less mainstream branded alcohol at low prices.

“I look on the supermarket websites to see where it’s cheapest.”

Experiences and motivations for drinking references on SNSs
All of the young people consulted had seen references and photographs on Facebook which portrayed alcohol related behaviour involving people their own age, with a couple of respondents also having seen videos on Facebook which captured drinking behaviour. Most of the young people acknowledged they also posted references and photographs connected to their drinking experiences.

“You’re just used to seeing it [drinking related status posts].”

The young people commented on how people in their age group would write status updates relating to their recent drinking experiences. Some recalled that these were sometimes posted whilst they were consuming alcohol, by uploading the posts and images from their mobile phones.

“When people take a picture with their mobile they normally post it straight away.”

“People will sometimes write a status, it will be all muddled up but even if you are drunk and you concentrate you can still do it. People do that for like, attention.”

Some young people suggested that postings would be written in advance of a night out, outlining their intention to consume alcohol. Status updates would also be posted at the end of the evening or the following day, updating friends about the previous night.

“I was absolutely hammered last night.”

The young people also reported how their behaviour influenced younger students lower down the school, who would mimic the older children’s behaviour and ‘pretend’ that they too had been drunk, via their status posts and photographs.

“Like twelve year olds will write drunken messages on it. They pretend to be drunk, they misspell all the words to make it look as though they are drunk.”

The impact of being seen as a drinker on Facebook
The main perceived positives of being seen as a ‘drinker’ through Facebook were demonstrating popularity, being portrayed as fun, having a laugh, and looking good in front of friends.

“If you have got no pictures of you drinking [on Facebook] it would be boring.”

In terms of negative aspects, one respondent reported how the risk of unwanted attention was heightened, given the possibility of tracking someone’s movements via imap or by keeping abreast of their future planned activities such as parties they were attending. In addition, one respondent identified the risk of people printing images that had been posted.

“It could be anyone looking at the images, a stalker, a paedophile. With the drinking I think it looks like you’re a bit willing to do anything, as if you are drinking under age then they will look at it as an advantage.”

However, this was not a serious enough concern to stop them from posting such material. Likewise, the young people were not overly concerned about the police and teachers being aware of their drinking behaviour.
Awareness and experiences of alcohol advertising on SNSs

Just a very small minority of the young people consulted had seen alcohol companies advertising on Facebook, through pop-ups on the side of their homepage.

“You’ve got like advertising things on the side, they just come up and they are different every day.”

A couple of respondents thought they recalled having seen a WKD Facebook ‘fan’ page which they had seen friends indicating they ‘liked’. One of the respondents assumed it was people her own age that were making these groups.

“WKD have got a page because it always pops up on the side with a little picture, I don’t know what it is though.”

Just one respondent mentioned searching for ‘funny videos’ on YouTube and had watched official alcohol videos. He recalled having watched the ‘Good Call’ advert by Fosters and the Heineken ‘Walk-in-fridge’ advert, and commented that they were amusing.

None of these respondents, however, were aware of alcohol channels on YouTube. Several cited concerns of these being available with people of all ages potentially able to access alcohol-related material on YouTube.

Awareness and experiences of alcohol brand websites

None of the respondents interviewed admitted to being aware of or visiting brand websites. Interestingly, the young people did not anticipate that such websites would contain games and competitions, but instead expected them to be dry and informative, providing factual information about alcohol units, calories and the dangers of alcohol to their health. They felt that brand websites ought to contain information about the product only or advice regarding the potential health risks of consumption.

“I think that’s a bit weird [having games etc] that’s nothing to do with alcohol. I suppose it’s to get people on there all the time. It’s a bit stupid cos you can go on games websites to play games.”

Age affirmation

With the exception of a couple of respondents, the majority had not encountered age affirmation on the internet. All respondents spontaneously cited how they would just make up their date of birth to overcome these if they needed to and how the barrier would not prevent them from using a website.

“I’d just use my mum’s [date of birth].”

“You don’t think ‘oh, I can’t go on this’.”

Awareness of anti-alcohol or health promotion videos

None of the respondents had seen any safe alcohol usage guidance on SNSs. There was no recall of any alcohol health related messages, though a couple mentioned having seen adverts for Talk to Frank about drugs on these sites. It was questioned whether young people would take notice of such information, although they were generally receptive to receiving more guidance about the risks of alcohol.
Public health practitioners cannot afford to ignore new media. Alcohol companies have embraced new technology to complement and extend their marketing reach, whilst SNSs are emerging as a place where young people in particular discuss and, often inadvertently, promote alcohol use and misuse.

The alcohol industry has positioned itself at the forefront of new media as another means to promote its products, and whilst representatives of drinks companies continue to insist that the industry does not target underage people, it does market its products via a medium that is especially attractive to the young and where particular care is therefore needed. Many alcohol brand websites, in particular, contain content such as competitions and prizes, arcade games, videos and music that are likely to appeal to younger age groups.

Age affirmation mechanisms appear to be completely inadequate to prevent under-18s from accessing much of the content on these sites. The alcohol industry argues that this is the most effective means available of verifying a visitor’s age (see Box 3 above), short of requesting personal information like bank account details. This may well be true, in which case in order to be sure of preventing children and young people from accessing content that is deemed to be only suitable for adults, such content must be removed from these sites, and they should be limited to factual information about the alcohol product(s) or non-promotional details, similar to that found on tobacco websites.70

“This extent to which alcohol producers are now using digital media to promote alcohol is a matter of serious concern due to the youth appeal of these sites, the difficulties with enforcing age restrictions, the relative lack of regulation and the sheer volume of promotional messages.”

Dr Bruce Riston, Chair of SHAAP71

This report has also highlighted the growing importance of SNSs to alcohol companies as a means of promoting their products. To its credit, Bebo, one of the leading SNSs, does not allow alcohol marketing on its site, whilst Facebook’s advertising guidelines prohibit the marketing of alcohol-related products in the UK to people under 18. Those Facebook pages with official alcohol marketing content are age-gated, aimed at preventing those under the legal drinking age from visiting them. However, there are two significant problems with this. First, as with brand websites indicated above, this is reliant on users registering their correct date of birth and not a fictitious one. Children and young people who enter a birth date which indicates they are 18 or over will therefore be able to access the content. Secondly, there are numerous user-generated pages on Facebook listed as the brand name which, whilst not officially endorsed, typically mirror or look very similar to their official pages, and which are not usually age-restricted. Therefore visitors to such pages can engage with the brand and view pro-drinking content despite being restricted from the brand’s official pages. There is a strong argument that if Facebook believes that young people should not be viewing official alcohol marketing, then it should investigate as a priority how restrictions can also be extended to encompass user-generated pages.
According to the Portman Group, which represents alcohol producers, user-generated content on third-party websites has “absolutely nothing to do with drinks companies and [is] completely beyond their control”. It is, in our view, highly likely that there are legal avenues that could be explored by producers, given that their registered trademarks and images are being used on Facebook and similar sites presumably without their permission, and steps that could be implemented by both alcohol producers and SNS administrators in order to remove examples of their unauthorised use, should they wish to.

Of course, it can be argued that having numerous user-generated, unofficial pages endorsing particular brands is actually beneficial to alcohol companies. The first result produced via a search on Facebook for “WKD”, for example, and again accessible by users of any age, is a user-generated page entitled “WKD Blue”, with an image of a WKD Blue bottle used as the profile picture. At the time of the search, 12,993 users had indicated they “like” the page, with typical posted comments including “Best drink in the WORLD!!” and “It’s so lush!!!!!!!”; the latter comment has been submitted by someone who, from their profile picture, appears to be under the legal drinking age.

Favourable comments and images about alcohol products from users, often young people, on sites like Facebook and YouTube mean that they act as unofficial brand ambassadors, “real” consumers indicating their approval of the product, and this may be as effective for alcohol companies as their official marketing campaigns.

In the tobacco field, there have been accusations of tobacco industry workers actually setting up pages on SNS to actively promote their brands. Researchers in Australia alleged in 2010 that employees of British American Tobacco were promoting the company’s cigarette brands by administering Facebook groups, joining groups as fans and posting promotional materials. This again further underlines recognition by marketers of the growing influence of SNSs as a means of targeting existing and new customers, although there is no evidence that alcohol producers have adopted similar tactics.

Of course, individuals are perfectly free to post online comments about particular drinks and upload images of their alcohol consumption, and most participants in our focus groups admitted to doing so on a regular basis. However, a crucial feature of SNSs is that much of the content is created and displayed by peers, and many of us may be more receptive to pro-drinking messages in this way. Previous studies have shown that assumptions that binge drinking is a norm for a particular social group, even if it is in fact incorrect, can become a self-fulfilling prophecy in that individuals within that group attempt to live up to that expectation by drinking more themselves.

“...young people themselves have become part of the marketing strategy. By using user-generated websites, such as YouTube, youngsters become free and influential marketers... In this way it becomes very difficult for policy makers to distinguish advertising from expressions by consumers. The anonymous, interactive and global nature of advertising on new media is a challenge for policy makers.”

European Centre for Monitoring Alcohol Marketing, 2009

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“One important difference between SNSs and more traditional media is that SNS content is created and displayed by an adolescent’s peers. As media models who are perceived to be similar to oneself are more likely to be imitated, SNSs are a potentially important source of influence on adolescent alcohol use.”

M. Moreno et al., 2010

This leads, of course, to a difficult and much deeper question about why, as a society, many of us feel the need to promote our own drinking via this platform, almost wearing our alcohol consumption as a badge of honour. There is no easy or short-term answer to how we shift social norms and ingrained cultural attitudes towards alcohol, but the research evidence strongly indicates that raising overall prices and restricting availability will be significantly advantageous, in addition to finding ways to limit our exposure to alcohol marketing.
Recommendation 1

Given their strong appeal to young people, official alcohol marketing should not be permitted on social networking sites.

Recommendation 2

Steps should be taken by alcohol producers and the administrators of social networking sites to end the unauthorised use of registered drinks trademarks, logos and advertising images on such websites, where they may be mistaken for official marketing. Administrators of social networking sites should also issue clearer guidelines about users posting content that may endorse or encourage irresponsible drinking.

Recommendation 3

Age affirmation pages are ineffective as a means of restricting young people’s access to websites containing alcohol-related content intended for adults. Further investigation is required into finding better ways of restricting access. In the meantime, alcohol brand websites in particular should restrict content to factual information about products.

Recommendation 4

Health bodies need to counter official alcohol marketing and pro-drinking messages on the internet by fully embracing and utilising new media themselves as a means to promote alcohol-related health messages.
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New media, new problem?
Alcohol, young people and the internet