

## General information

Completed by:	
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Function/position	Policy Officer UK&EU
Organisation	Institute of Alcohol Studies (IAS) United Kingdom/ European Alcohol Policy Alliance (Eurocare)

## Aim of the study

- ❖ Is the aim of the report well defined?

Yes

*Minor revisions* (Please provide your answer in the box below)

The draft report does not include a clear definition of alcohol advertising. The report appears to use a traditional understanding of advertising, e.g. advertisements in commercial breaks or a banner online, but has not taken into account a broader definition of commercial communications, e.g. sponsorship or online interactions/participation via social media (e.g. sharing, liking and commenting). We would like to see a clear definition in the final report, and also a reflection on the limitations this definition could lead to in omitting new media channels.

## Research Question 1: How much alcohol advertising does an average minor watching linear audio-visual media in the EU see?

- ❖ Are the methods used appropriate?

Yes

*Minor revisions* (Please provide your answer in the box below)

- We support the definition of minors as below 18 years old
- We support the breakdown of audience into age groups as per the findings
- We believe it is important to understand as much as possible about the audience of programmes with alcohol advertisements and would have liked to see even more detailed break down, such as
  - types of programmes
  - audience profile (including socioeconomic groups)
  - brand breakdown.

- ❖ Are the data used sound?

Yes

*Minor revisions* (Please provide your answer in the box below)

The methodology and use of descriptors for Gross Rating Points is unclear in places. For clarity, it would be helpful to align terminology with internationally recognised descriptors, (or at least use quite clear, distinct terms) for example the terms used on p.10:

- Rat% - this could be termed 'reach' or 'rating'

- GRP(000) – this could be termed ‘gross impressions’
- GRP% - this could be termed Gross Rating Point

The consistent use of terminology will help provide clarity throughout the document when referencing these data.

❖ Are the information sources used sound?

Yes

❖ Is the analysis well balanced?

Yes

*Minor revisions* (Please provide your answer in the box below)

- In 4.1 Summary, end of page 38, the second bullet point says ‘...reveals that this percentage ranges from 5% to 9%...and to 14.7% based on the WFA...’ – while on page 63 it says ‘...the results are similar to those found in WFA...’. The two pages don’t seem to correspond and it would be good with the correct version.
- In addition to some clarification of the definitions (see above), we would also like to comment that the report is not consistent in using the definitions set out on page 10. As an example, it is not clear on page 52 “Figure 4.19 shows the number of total market advertising impacts that an average individual, per audience group, has seen”.
- Corrections:

Page 50, in section 4.3.1 – We believe figure 4.17 should have been 4.16

Page 51, between the 4.16 and 4.17, we believe the text referred to in figure 4.16, should have been 4.17

❖ Are the preliminary findings adequately supported by the data?

Yes

*Minor revisions* (Please provide your answer in the box below)

- In some countries, sport channels appear to broadcast significant levels of alcohol advertisements according to the annexes, and we think this could have been reflected in the final report.
- UK channel type ‘other’ shows the majority of advertisement in the UK (annex p 145) compared to the other channels identified in the figure – we believe it would be good with a break down of ‘others’ to understand as much as possible about the advertisement patterns and diverse media landscape.
- The draft report compares the advertisement of alcohol with the total amount of advertisements. We believe this is not very relevant when the question is solely about exposure of alcohol advertisement and not all advertisement of all products. By adding more data which is not specifically answering the research questions, there is a risk of confusing the audience

**Research Question 2: 2. How much alcohol advertising does an average minor see on non-linear audio-visual media services and other online services in the EU?**

❖ Are the methods used appropriate?

Yes (viewers) No (other stakeholders)

Major revisions

- We welcome the initiative of including what the end viewers are seeing (survey among minors). However, the study is using what we define as an 'open recall' ("have you seen any?") rather than a prompted recall (showing an advert which has been shown the last months) on the question if they have seen any advertisements. These are two different approaches to the methodology, and we would have liked to see a prompted recall included as a follow up after the open recall.
- We also welcome the initiative to include other stakeholders regarding their methods and views on advertisement technics. However, we would have like to see other stakeholders (such as parents, Member States with regulation that goes beyond the AVMSD, public health community) also given attention in chapter 5.

❖ Are the used data sound?

Yes

❖ Are the information sources used sound?

No

Minor revision (Please provide your answer in the box below)

- Chapter 5, 'perspective of advertisers' should also say 'and alcohol producers' in the title to clarify the industry engagement in this report
- Ideally the report should include views from more stakeholders – parents, public health bodies, in this section – as mentioned above

❖ Is the analysis well balanced?

Yes

Minor revisions (Please provide your answer in the box below)

- The analysis is well balanced when looking at the findings in the report, however, the analysis would benefit from consideration of views from other stakeholder groups as listed above.
- Summary 6.1 p 86 – we would like to see the summary more detailed and broken the age group down to 9-13 and 14-17 – we therefore suggest to add the numbers from figure 6.19 p 101 in the summary: 9-13 years 19.5% and 14-17 29.2%

❖ Are the preliminary findings adequately supported by the data?

Yes

**Research Question 3: For audio-visual media services (both linear and non-linear) and other online services, what type of alcohol advertising does an average minor see in the EU? Are minors specifically targeted by alcohol advertising? In how far is alcohol advertising appealing to minors and how? In particular, in how far do the provisions of the AVMSD and their application afford the required level of protection?**

❖ Are the methods used appropriate?

Yes

*Minor revisions* (Please provide your answer in the box below)

- The three most popular online ads from each country were purchased for the report. We would like to comment that this provides a limited scope for analysis.
- In addition to the limited selection, the way each advert has been analysed is as a static ad, and not addressing the social character (participation/interaction) of online marketing. This traditional way of understanding online advertisement is not capturing the added value of viral techniques, and we would like this addressed as a limitation in the methodology, and recommend that future research explore this issue.

❖ Are the used data sound?

Yes

❖ Are the information sources used sound?

Yes

❖ Is the analysis well balanced?

Yes

❖ Are the preliminary findings adequately supported by the data?

Yes

#### **General comments**

❖ If you wish to make any further comments on the report please use the space provided below

- We would like to thank the Ecorys team and DG Connect for the inclusive working methods and the possibility to participate in the consultation process

***Thank you for your feedback.***