

WRITTEN EVIDENCE SUBMITTED BY THE INSTITUTE OF ALCOHOL STUDIES

Executive summary:

- A primary harm from online and social media use for young people is exposure to alcohol advertising. Children exposed to this have been found to drink earlier and more than they otherwise would.¹
- The current self-regulatory system for alcohol marketing has been criticised for failing to protect young people from exposure to these advertisements. Statutory regulation of alcohol marketing, restricting advertisement placement and content, is required.

Answering items: What evidence there is on the effects of social media and screen-use on young people's physical and mental well-being — for better and for worse — and any gaps in the evidence; / The physical/mental harms from social media use and screen-use, including: safety online risks, the extent of any addictive behaviour, and aspects of social media/apps which magnify such addictive behaviour.

1.1 Online and social media represent substantial, growing marketing channels for the alcohol industry. For example, in 2011, drinks producer Diageo confirmed a multimillion-pound advertising deal with Facebook.² Exposure to such alcohol advertising – both brand advertising and user-generated content – is harmful to children for two reasons. Firstly, research has repeatedly found that exposure to alcohol marketing encourages children to drink earlier, in greater quantities, and in riskier ways than they otherwise would,^{3, 4} while user-generated content might encourage risky drinking practices such as 'Neknominat'. Finally, there are broader elements of messaging contained within such alcohol marketing that might harm children's social development, such as the highly gendered messaging sometimes found here.

1.2 Children exposed to alcohol marketing materials have been found to drink earlier and more than they otherwise would - findings supported by the World Health Organisation⁵ and the Science Committee of the European Alcohol and Health Forum.⁶ A 2017 systematic review of research examining the impact of exposure to alcohol marketing on young people concluded that the more exposure to such advertising young people receive, the more likely they are to start drinking, binge drink, and drink at hazardous levels.⁷ Effects of this kind have been found across a range of marketing channels including movies, television, sponsorship of sporting and music events, online video, magazine advertisements, music, video games, alcohol-branded merchandise, free samples, and price offers.^{8, 9, 10, 11, 12, 13, 14}

1.3 Social media and online advertising are no exceptions, with multiple studies finding links between exposure to this (amongst other marketing activity) and young people's alcohol use. Longitudinal research examining four European countries found that young people's alcohol use is affected by exposure to alcohol marketing, including online alcohol advertising,¹⁵ while research from Australia found an association between liking or following social media profiles of alcohol brands and riskier alcohol consumption amongst 15 to 29-year-olds.¹⁶ This is concerning as the growth of social and online media continues to open up new ways that young people might become exposed to this kind of advertising. For example, some have raised the "substantial potential" for young people to be exposed to alcohol advertising through online streaming services.¹⁷

¹ Jernigan, D., Noel, J., Landon, J., Thornton, N. and Lobstein, T. 2017. [Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008](#). *Addiction*, 112, pp.7-20.

² The Financial Times. 2011. [Facebook strikes Diageo advertising deal](#).

³ Jernigan, D. et al. 2017. [ibid.](#)

⁴ Scientific Opinion of the Science Group of the European Alcohol and Health Forum. 2009. [Does marketing communication impact on the volume and patterns of consumption of alcoholic beverages, especially by young people? – a review of longitudinal studies](#).

⁵ World Health Organisation Europe. 2009. [Evidence for the effectiveness and cost-effectiveness of interventions to reduce alcohol-related harm](#).

⁶ Scientific Opinion of the Science Group of the European Alcohol and Health Forum. 2009. [ibid.](#)

⁷ Jernigan, D. et al. 2017. [ibid.](#)

⁸ Tanski, S.E., McClure, A.C., Li, Z., Jackson, K., Morgenstern, M., Li, Z. and Sargent, J.D. 2015. [Cued recall of alcohol advertising on television and underage drinking behavior](#). *JAMA pediatrics*, 169(3), pp.264-271.

⁹ Morgenstern, M., Sargent, J.D., Sweeting, H., Faggiano, F., Mathis, F. and Hanewinkel, R. 2014. [Favourite alcohol advertisements and binge drinking among adolescents: a cross-cultural cohort study](#). *Addiction*, 109(12), pp.2005-2015.

¹⁰ Hanewinkel, R., Sargent, J.D., Poelen, E.A., Scholte, R., Florek, E., Sweeting, H., Hunt, K., Karlsdottir, S., Jonsson, S.H., Mathis, F. and Faggiano, F. 2012. [Alcohol consumption in movies and adolescent binge drinking in 6 European countries](#). *Pediatrics*, pp.peds-2011.

¹¹ Tucker, J.S., Miles, J.N. and D'Amico, E.J. 2013. [Cross-lagged associations between substance use-related media exposure and alcohol use during middle school](#). *Journal of Adolescent Health*, 53(4), pp.460-464.

¹² de Bruijn, A., Tanghe, J., de Leeuw, R., Engels, R., Anderson, P., Beccaria, F., Bujalski, M., Celata, C., Gosselt, J., Schreckenber, D. and Stodownik, L. 2016. [European longitudinal study on the relationship between adolescents' alcohol marketing exposure and alcohol use](#). *Addiction*, 111(10), pp.1774-1783.

¹³ Brown, K. 2016. [Association between alcohol sports sponsorship and consumption: a systematic review](#). *Alcohol and alcoholism*, 51(6), pp.747-755.

¹⁴ Smith, L.A. and Foxcroft, D.R., 2009. [The effect of alcohol advertising, marketing and portrayal on drinking behaviour in young people: systematic review of prospective cohort studies](#). *BMC public health*, 9(1), p.51.

¹⁵ de Bruijn, A. 2016. [ibid.](#)

¹⁶ Carrotte, E.R., Dietze, P.M., Wright, C.J. and Lim, M.S. 2016. [Who 'likes' alcohol? Young Australians' engagement with alcohol marketing via social media and related alcohol consumption patterns](#). *Australian and New Zealand journal of public health*, 40(5), pp.474-479.

¹⁷ Siegel, M., Kurland, R.P., Castrini, M., Morse, C., de Groot, A., Retamozo, C., Roberts, S.P., Ross, C.S. and Jernigan, D.H. 2016. [Potential youth exposure to alcohol advertising on the internet: a study of internet versions of popular television programs](#). *Journal of substance use*, 21(4), pp.361-367.

- 1.4 Children using social media are also at risk of being influenced not only by branded alcohol marketing, but by user-generated content – a unique aspect of social and online media. An example of such content is the Nekominate challenge which spread across social networks in 2014. This challenge involved a user drinking a large amount in a short space of time, and uploading a video of this to social media, in which they challenge a friend to respond with a similar stunt. This trend raised concerns amongst health advocates, with Suzanne Costello of Alcohol Action Ireland suggesting: "the online nature of the challenges mean the peer pressure aspect of it has far greater reach than traditional drinking games would have had."¹⁸ Indeed, research has demonstrated such user-generated alcohol related content can affect young people's alcohol consumption in similar ways to branded content. US research has found that exposure to alcohol-related media, including viewing "videos on the internet showing someone who is drunk or high" or "pictures or comments on a social networking site (like Facebook or MySpace) showing or talking about someone who is drunk or high", may escalate young people's alcohol use over time; the more alcohol-related media they see, the more they drink, and the more they drink, the more they seek out alcohol-related media.¹⁹
- 1.5 Another unique problem of online and social media advertising of alcohol is that parents have no idea about the quantity and type of advertising that their children are being subjected to. In the case of alcohol, this makes it more difficult for parents to have conversations with their children about consumption if they are unaware that their children are seeing alcohol advertising in the first place. There are already barriers for parents attempting to engage in meaningful dialogue about alcohol with their children; for example, the Alcohol and Families Alliance highlight the need for government to properly communicate the Chief Medical Officers' recommendation of an alcohol-free childhood.²⁰ The possibility that children are seeing messaging around alcohol that parents are not aware of might undermine the conversations parents attempt to have with them, or affect the age at which parents decide to teach their children about alcohol.
- 1.6 It has been demonstrated that alcohol advertising is highly gendered. Scottish Health Action on Alcohol Problems and the Institute of Alcohol Studies have highlighted that "when marketing is targeted at women...the aim is to establish a link between alcohol and empowerment...Marketing targeted at men often depicts women as sexual objects...".²¹ Exposure to such advertising has the potential to embed harmful, regressive gender norms amongst young people.

Answering items: Any measures being used, or needed, to mitigate any potential harmful effects of excessive screen-use — what solutions are being used?; What measures, controls or regulation are needed; Where responsibility and accountability should lie for such measures.

- 2.1 In the UK, alcohol marketing is currently governed through a mix of co- and self-regulation; this is handled by the Advertising Standards Authority (funded by the advertising industry²²), Ofcom, and the Portman Group (funded by the alcohol industry²³).
- 2.2 However, such self-regulatory systems have been long criticised for their ineffectiveness. Public Health England noted that multiple systematic reviews have found that such self-regulatory systems fail to meet "their intended goal of protecting vulnerable populations"²⁴ and that alcohol industry tactics to influence policy, including the use of such self-regulatory codes "are similar to the strategies used by the tobacco industry"²⁵. The UK's self-regulatory system has proven to be no exception. In a report analysing the Portman Group's decisions on complaints against alcohol advertising from 2006-17, Alcohol Concern and Alcohol Research UK found that "decision-making has not been consistent over time" and that "decisions have often appeared subjective".²⁶ Further, following an inquiry into the alcohol industry's conduct in 2009, the House of Commons Health Select Committee concluded that there are: "major shortcomings in the current self-regulatory codes covering alcohol advertising. Specifically, the codes do not...prevent the promotion of drunkenness and excess; or the linking of alcohol with social and sexual success..."²⁷
- 2.3 The current self-regulatory system has also been criticised for failing to protect young people from exposure to alcohol advertising. While the codes of this system state that alcohol ads must not be directed at people under 18, internal communications from alcohol producers and their advertising agencies show that young people have been targeted with such advertising, with market research data from 15-16 year olds used in the development of

¹⁸ The Irish Mirror. 2014. [Neck nominations: Internet drinking craze 'Nekominate' slammed by Alcohol Action Ireland.](#)

¹⁹ Tucker, J.S., Miles, J.N. and D'Amico, E.J. 2013. *ibid.*

²⁰ Alcohol and families Alliance. 2018. [Families First: An evidence-based approach to protecting UK families from alcohol-related harm.](#)

²¹ SHAAP and IAS. 2018. [Women and Alcohol: Key Issues.](#) p. 7.

²² Advertising Standards Authority. 2018. [What we spend and how we spend it.](#)

²³ Portman Group. 2017. [History and Mission.](#)

²⁴ Public Health England. 2016. [The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies: An evidence review.](#) p. 110.

²⁵ Public Health England. 2016. *op. cit.* p. 109.

²⁶ Alcohol Concern / Alcohol Research UK. 2018. [Fit for purpose? An analysis of the role of the Portman Group in alcohol industry self-regulation.](#) p. 3.

²⁷ Memorandum by Professor Gerard Hastings. 2010.

["They'll Drink Bucket Loads of the Stuff": An Analysis of Internal Alcohol Industry Advertising Documents](#), to the House of Commons Health Select Committee Inquiry. p. 1.

campaigns. Further, brands were found to explicitly describe campaigns and audiences in youthful terms, with Lambrini suggesting their TV advertisement aimed to be “a cross between Myspace and High School Musical” while Carling hoped to “become the most respected youth brand...”. The Portman Group’s own guidance on deciding on whether a complaint against alcohol marketing should be upheld for appealing to young people states that “the test to apply is not one of quantity, i.e. appealing to more under 18s than over 18s, but the way in which it appeals, i.e. the packaging/promotion appeals to/resonates with under 18s in a way that it does not with over 18s”.²⁸ However, as Alcohol Concern and Alcohol Research UK point out, this means that “under this interpretation, a drink could have strong appeal to a large number of children, but as long as it also appealed to adults it would be acceptable.”²⁹

2.4 The failings of this code may also allow brands to embed links between regressive gender stereotypes, sexual success, and alcohol use in young people’s minds. Indeed, in the same internal marketing documents already discussed, one Carling executive suggested “[Young men] think about 4 things, we brew 1 and sponsor 2 of them” – such outdated ideas targeted at young people may produce social harm, perpetuating harmful norms around gender inequity.³⁰

2.5 The House of Commons Health Select Committee inquiry also noted the poor performance of the current regulatory systems in dealing with online and social media specifically, concluding that: “the codes are extremely weak in their treatment of new media which are rapidly becoming the biggest channel for alcohol promotion”.³¹ This echoes international research; US research found that fictional YouTube user accounts created with ages below the legal drinking age in the US – 14, 17 and 19 – were able to subscribe to every alcohol brand YouTube page the study explored.³² Similarly, an Australian study found typically “poor filter systems” (“in-built barriers to underage access to alcohol brand websites” such as pages requiring the user to enter a date of birth) on all alcohol brand websites investigated, failing to protect underage visitors.³³ Further, the format of decision making in the current self-regulatory system means rulings on marketing can often take substantial amounts of time. As Alcohol Concern/Alcohol Research UK note, in practice this often means “promotional activities that are found to have breached the Code will already have been active in the public domain for some time, and a campaign may even have been completed, before the judgement has been made.”³⁴ This effect is amplified by the speed of dissemination of campaigns via social media. An example of this is the decision from the ASA on a Captain Morgan branded Snapchat filter that was judged to appeal to under 18s, due to its use of cartoons. The decision was made in January 2018, more than half a year after the filter’s release. In an article discussing the ruling, Baroness Hayter questioned:

“Too little too late? The ASA themselves note that 13-17-year olds represented “one of the largest groups” of Snapchat’s 11 million audience, yet their decision took six months to emerge, during which time children continued to see the ad...In this landscape, brands continue to push the boundaries of what is appropriate, knowing their ads will probably run uninterrupted, at a price of what is essentially a verbal warning.”³⁵

2.6 Social media marketing also complicates regulation further, because of the role user-generated content plays in this. A marketing initiative such as the Captain Morgan filter described above is not only promoted by the brand themselves, but when users apply this to their own photos, they go on to share this with friends. The nature and reach of social media might mean that this secondary sharing of user-generated content is more potent than the original campaign from the brand. There is little scope within the current self-regulatory system to address this. As discussed previously, the committee ought to consider how best to address the harms to young people caused by viral user-generated content relating to alcohol, such as the neknominate challenge.

2.7 All of these limitations of the current system have led many to call for statutory regulation of marketing. Such measures are already in place in France where the ‘Loi Evin’ regulation means that there are restrictions on the placement and content of alcohol advertising. Advertising is not only prohibited from targeting young people, but is prohibited from containing ‘lifestyle’ messaging, meaning the highly regressive, gendered imagery and content that can be presented to children via alcohol advertising in the UK is illegal.³⁶ Including placement restrictions in such a law would also allow for limits or the removal of alcohol advertising from social media with youthful audiences.

²⁸ Portman Group. 2018. [Guidance Note: General Interpretation of the Fifth Edition of the Code](#). p. 14.

²⁹ Alcohol Concern / Alcohol Research UK. 2018. op. cit. p. 9.

³⁰ Memorandum by Professor Gerard Hastings. 2010. op. cit. p. 1 & p. 3

³¹ Memorandum by Professor Gerard Hastings. 2010. op. cit. p. 1.

³² Barry, A.E., Johnson, E., Rabre, A., Darville, G., Donovan, K.M. and Efunbumi, O. 2014. [Underage access to online alcohol marketing content: a YouTube case study](#). Alcohol and alcoholism, 50(1), pp.89-94.

³³ Jones, S.C., Thom, J.A., Davoren, S. and Barrie, L. 2014. [Internet filters and entry pages do not protect children from online alcohol marketing](#). Journal of public health policy, 35(1), p.75.

³⁴ Alcohol Concern / Alcohol Research UK. 2018. op. cit. p. 25.

³⁵ The House. 2018. [Baroness Hayter: Self-regulation of the advertising industry simply isn’t working](#).

³⁶ Institute of Alcohol Studies. 2017. [Policies to regulate alcohol marketing](#).

- 2.8 It is also essential that regulation is upheld by an independent body, free from industry influence. This need for independence is echoed by “the World Health Organisation’s view that the alcohol industry should have no role in policy making.”³⁷ Indeed, Alcohol Concern / Alcohol Research UK have noted that an independent regulator acting under statutory regulation would be obliged “to answer fully to the public and Parliament” and avoid “any perception that its decisions are conflicted by links to the alcohol industry or other interests.”³⁸
- 2.9 Calls for ‘Loi Evin’ style regulation is echoed internationally by the World Health Organisation,³⁹ as well as in the UK by the Alcohol Health Alliance,⁴⁰ a coalition of organisations including medical royal colleges, charities, patient representatives and alcohol health campaigners, who wish to reduce the damage caused to health by alcohol.

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³⁷ Alcohol Health Alliance. 2018. [AHA letter to the Portman Group](#).

³⁸ Alcohol Concern / Alcohol Research UK. 2018. op. cit. p. 3.

³⁹ World Health Organisation. 2017. [Tackling NCDs](#).

⁴⁰ University of Stirling, Alcohol Health Alliance, and British Liver Trust. 2013. [Health First: An evidence-based alcohol strategy for the UK](#).