

ALCOHOL KNOWLEDGE CENTRE

BRIEFING



**ALCOHOL
AND
MARKETING**

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This briefing contains the following chapters:

- What is alcohol marketing?
- Alcohol marketing: The debate
- Alcohol marketing and children
- Alcohol marketing and gender
- Alcohol sports sponsorship
- Policies to regulate alcohol marketing

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Alcohol and marketing

Summary

- Alcohol marketing utilises the 'four Ps': product; price; place and promotion, in order to increase sales (and in turn consumption)
- Since 2009, there have been ongoing indications that the industry aims to increase consumption amongst existing drinkers, rather than advertising to maintain market share
- Evidence shows that exposure to alcohol marketing encourages children to drink at an earlier age and in greater quantities than they otherwise would
- A 2019 rapid literature review found that women are targeted by the alcohol industry through a range of strategies including the creation of products aimed at women, using lifestyle messages that reinforce gender stereotypes, offering feminine accessories and using messages of empowerment
- Evidence suggests an association between alcohol sports sponsorship and harmful drinking among schoolchildren and sportspeople – major medical and public health institutions in the UK currently call for a ban of alcohol sports sponsorship to protect children
- Alcohol advertising rules in the UK are currently a mix of co-regulation (with Ofcom) and self-regulation, administered by the ASA and the Portman Group, but often fail to protect children from exposure, especially online
- The World Health Organisation's 'Best Buys' framework recommend the enforcement of bans or comprehensive restrictions on exposure to alcohol advertising (across multiple types of media), such as is in force in France and Norway

Introduction

Alcohol marketing includes **advertising** in traditional media outlets such as print, television and radio, **promotional activities in online and social media**, and **sponsorship of sporting and music events**

Alcohol marketing utilises the 'four Ps': **product; price; place and promotion**. **Tactics under each of these 'four Ps' have been found to increase consumption**

The alcohol and advertising industries argue that as alcohol is a legal product it should be legally possible for it to be advertised, while many argue that as well as promoting brands, advertising is also concerned with **recruiting new drinkers and increasing sales among existing, and especially heavy consumers**. Many see parallels between alcohol advertising and promotion and that of tobacco in the past

Research shows that exposure of children and young people to alcohol marketing **leads them to drink at an earlier age and to drink more than they otherwise would**

There are gendered aspects to alcohol marketing in the ways **women are both represented in alcohol marketing and targeted by marketers**. However, the effects of this on drinking and on gender equity are not well-studied

Marketers invest heavily in sponsorship of sporting events, which is associated with increased consumption among young people and sportspeople

The current regulatory system and codes of conduct have been criticised for failing to protect children from exposure to alcohol marketing. Limitations of self-regulation and restrictions on digital marketing have also been identified. Many health groups – including the WHO – have called for alcohol advertising bans and/or greater restrictions to be introduced, such as those that are in place in France under the *Loi Évin*.

What is alcohol marketing?

Marketing is the action or business of promoting and selling products or services. Marketing covers a wide range of activities and disciplines including – but by no means limited to – advertising in traditional media outlets such as print, television and radio, promotional activities in online and social media, and sponsorship of sporting and music events. A common term used to define the key aspects of marketing is the *marketing mix*, made up of the 'four Ps': Product, Price, Place and Promotion (see figure 1).

Figure 1 The 4Ps (the 'Marketing Mix')



Source: PRRImageFactory, iStock

Alcohol marketing utilises all four Ps of the marketing mix:

Product

The design of certain alcoholic drinks appeals more to adolescents than they do to an adult audience. Australian research has found the packaging used for alcopops or ready to drink (RTD) beverages had higher palatability amongst adolescents than adults,¹ and that almost half of adolescents would be more likely to purchase a product that looked like a soft drink.²

A study carried out for the UK regulatory authorities in 2004 suggested the brand values of alcopops were strikingly attuned to adolescence: they celebrate mocking the older generation and getting away with things, and that the packaging is designed to appeal to teenagers and young people by using animals and animation.³

A report from the University of Stirling suggested social media has created new opportunities for product packaging to become a more potent advertising platform for brands, through the potential to encourage user-generated content.⁴ Glassware is also known to influence sales and consumption,⁵ but is outside of traditional marketing controls in the UK.

Price

Robust research has established the relationship between alcohol prices and consumption⁶ and surveys have identified that patients with serious alcohol problems purchase the cheapest alcohol.^{7,8} Alcohol has also become more affordable in the UK – especially in the off-trade – over the last 30 years.⁹

Price-based policy interventions include taxation and minimum pricing. Scotland passed legislation to implement minimum unit pricing (MUP) in 2012, and after legal challenges by the Scotch Whisky Association, a MUP of 50p was introduced in Scotland in May 2018. Alcohol sales in Scotland were 3% lower in 2018 than the year before, but the evaluation of MUP is still underway.¹⁰ A modelling study predicted that after twenty years (full effect of the policy), a MUP of 50p would result in 121 fewer deaths and 2,042 fewer hospital admissions each year in Scotland.¹¹

Discounts and promotions can be a key tool for alcohol producers and retailers. There is evidence that when people purchase greater quantities of alcohol through volume-based price promotions (eg multibuys), they increase their consumption levels,¹² and that point of sale promotions may be associated with higher quantities purchased rather than simply switching between brands.¹³ Research from the University of Sheffield indicates that a ban on multi-buy promotions would increase the efficacy of MUP: modelling shows that MUP combined with a ban on off licensed trade discount bans in Scotland would show greater reductions in levels of alcohol consumption, alcohol-related hospital admissions and deaths.¹⁴

Since 2014 there has been a ban in England and Wales on businesses selling alcohol below the cost of duty plus VAT.¹⁵ Whilst this may appear a positive step, it has been demonstrated that this strategy would have little substantive impact, and that MUP approaches would be more effective in reducing excessive consumption.¹⁶

Place

Where alcohol is sold can have an impact on the number and volume of alcohol purchases. We know that more and more outlets selling alcohol for longer periods of time throughout the day has increased the availability of and accessibility to alcohol, which impacts on consumption.¹⁷

In the off-trade, placement and positioning of products such as front of store and end of aisle promotions in supermarkets and shops impacts on sales. A 2014 study found end of aisle displays were found to increase the purchase of alcohol by up to 46%.¹⁸ In the on-trade, while licensing legislation bans 'irresponsible promotions' such as drinking games in which customers drink as much as possible within a time limit,¹⁹ marketing in the night-time economy promotes venues by associating drinking with sexual success (see *Alcohol marketing and gender*).²⁰

Promotion

Promotion covers a wide range of activities, including advertising and sponsorship. Publicly available data on the extent of and spend on promotion is scarce. In the UK, alcohol advertising spend was estimated at £800m in 2010,²¹ and alcohol drinks companies were the second largest source of sponsorship funding from 2003 to 2006.²² Alcohol is increasingly promoted in new media and online. For example, in 2011, drinks giant Diageo

signed a multimillion-pound deal with Facebook.²³ Celebrity sponsorship, PR-generating activity and viral marketing are further tools alcohol brands can deploy outside current advertising restrictions.²⁴

Restrictions have been shown to impact on consumption, for example a 2014 study of 27,000 50–64-year-olds found advertising restrictions were associated with lower rates of hazardous drinking.²⁵

¹ Gates, P., et al (January 2007)., 'The influence of product packaging on young people's palatability rating for RTDs and other alcoholic beverages', *Alcohol and Alcoholism*, 42: 2, pp. 138–142

<http://alcalc.oxfordjournals.org/content/42/2/138.full.pdf+html#_blank>

² Metzner C., and Kraus L (October 2007)., 'The impact of alcopops on adolescent drinking: A literature review', *Alcohol and Alcoholism*, 43: 2, pp. 230–239 <http://alcalc.oxfordjournals.org/content/43/2/230.full.pdf+html#_blank>

³ Cragg Ross Dawson: Arnold Cragg (July 2004), 'Alcohol Advertising and Young People: RESEARCH REPORT', for Independent Television Commission [ITC], Ofcom, the British Board of Film Classification [BBFC], and the Advertising Standards Authority

⁴ Purves, R., Stead, M., and Eadie, D. (December 2014), "'What are you meant to do when you see it everywhere?' Young people, alcohol packaging and digital media', *Institute for Social Marketing*, University of Stirling, p. 5

⁵ Stead, M., Angus, K., Macdonald, L., and Bauld, L., (January 2014) 'Looking into the Glass: Glassware as an Alcohol Marketing Tool, and the Implications for Policy', *Alcohol and Alcoholism*, 49: 3, pp. 317–320

<<http://alcalc.oxfordjournals.org/content/49/3/317.full.pdf>>

⁶ Wagenaar, A. C., Salois, M. J., & Komro, K. A. (2009), Effects of beverage alcohol price and tax levels on drinking: a meta-analysis of 1003 estimates from 112 studies. *Addiction*, 104(2), 179–190

⁷ Black H, Gill J, Chick J. The price of a drink: levels of consumption

and price paid per unit of alcohol by Edinburgh's ill drinkers with a comparison to wider alcohol sales in Scotland.

Addiction

2011;106:729–36

⁸ Sheron N, Chilcott F, Matthews L, et al. Impact of minimum price per 57. unit of alcohol on patients with liver disease in the UK. *Clin Med* 2014;14:396–403

⁹ Institute of Alcohol Studies (2018), The Rising Affordability of Alcohol (Briefing)

<<http://www.ias.org.uk/uploads/pdf/IAS%20reports/sb20022018.pdf>>

¹⁰ NHS Health Scotland (2019), MESAS monitoring report 2019

<<http://www.healthscotland.scot/publications/mesas-monitoring-report-2019>>

¹¹ Angus, C., Holmes, J., Pryce, R., Meier, P., Brennan, A., (April 2016), 'Model-based appraisal of the comparative impact of Minimum Unit Pricing and taxation policies in Scotland: An adaptation of the Sheffield Alcohol Policy Model version 3', SchARR: University of Sheffield

¹² University of Sheffield (2008), 'Modelling alcohol pricing and promotion effects on consumption and harm', Independent Review of the Effects of Alcohol Pricing and Promotion, Part B

<https://www.sheffield.ac.uk/polopoly_fs/1.956211/file/PartB.pdf>

¹³ Jones, S., Barrie, L., Gregory, P., Allsop, S., Chikritzhs, T., (August 2014), 'The influence of price-related point-of-sale promotions on bottle shop purchases of young adults', *Drug and Alcohol Review*, 34:2, pp. 170–176

<<http://onlinelibrary.wiley.com/doi/10.1111/dar.12181/full>>

¹⁴ Meng, Y., et al (January 2012)., 'Model-based appraisal of alcohol minimum pricing and off-licensed trade discount bans in Scotland using the Sheffield Alcohol Policy Model (v.2): Second update based on newly available data', SchARR, University of Sheffield, Sheffield Alcohol Research Group

<<http://www.shef.ac.uk/scharr/sections/ph/research/alpol/publications>>

¹⁵ Government response to the alcohol consultation, Secretary of State for the Home Department, p. 3; 'Banning the sale of alcohol below the cost of duty plus VAT'

¹⁶ Leicester, Andrew (November 2011), 'Alcohol pricing and taxation policies', Institute for Fiscal Studies, p. 3 / Gov.uk, 'The Government's Alcohol Strategy', Secretary of State for the Home Department, p. 7

¹⁷ Popova, S., Giesbrecht, N., Bekmuradov, D., & Patra, J. (2009), Hours and days of sale and density of alcohol outlets: Impacts on alcohol consumption and damage: a systematic review. *Alcohol & Alcoholism*, 44(5), 500–516.

¹⁸ Nakamura, R., Pecheya, R., Suhrcke, M., Jebba, S., Marteau, T., (May 2014),

"Sales impact of displaying alcoholic and non-alcoholic beverages in end-of-aisle locations: An observational study", *Social Science and Medicine*, 108, pp. 68–73

¹⁹ Institute of Alcohol Studies (2014). Availability and Licensing (factsheet)

²⁰ Atkinson AM, Begley E, Jones L, Sumnall H (2019), A rapid narrative review of literature on gendered alcohol marketing and its effects: exploring the targeting and representation of women <NOT YET PUBLISHED>

²¹ Memorandum by Professor Gerard Hastings, Institute for Social Marketing, University of Stirling & the Open University [AL 81] (January 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

²² www.parliament.uk, 'Alcohol First Report of Session 2009–10, Volume I', House of Commons Health Committee

²³ Bradshaw, Tim (September 2011), 'Facebook strikes Diageo advertising deal', Financial Times

<<http://www.ft.com/cms/s/2/d044ea24-e203-11e0-9915-00144feabdc0.html#axzz2TLmvtNNk>>

²⁴ Guy, D., (March 2016), 'How to market alcohol where alcohol marketing is banned – Focus', retrieved October 2016

<http://www.just-drinks.com/analysis/how-to-market-alcohol-where-alcohol-marketing-is-banned-focus_id119700.aspx>

²⁵ Bosque-Prous, M., Espelt, A., Guitart, A. M., Bartroli, M., Villalbí, J. R. and Brugal, M. T. (2014), 'Association between stricter alcohol advertising regulations and lower hazardous drinking across European countries.' *Addiction*, 109: 1634–1643 <<http://onlinelibrary.wiley.com/doi/10.1111/add.12562/full>>

Alcohol marketing: The debate

The alcohol and advertising industries argue that as alcoholic drinks are legal products it should be legally possible to advertise them, and that bans would have adverse effects on the alcohol market and on the media. They argue bans are not justified, as advertising is concerned with promoting sales of individual brands and there is no evidence of a causal link between advertising and the overall level of alcohol consumption or the amount of alcohol-related harm.

The main counterarguments are that as well as promoting brands, advertising is also concerned with recruiting new drinkers and increasing sales among existing – and especially heavy – consumers. By definition, alcohol advertising is also one-sided, avoiding any reference to the negative aspects of alcohol consumption. Intensive advertising and promotion of alcohol appears to sanction and legitimise use of a product which causes high levels of damage to individuals and society.

The arguments regarding alcohol advertising are in most respects parallel to those concerning tobacco advertising. An analysis from 2000 of internal documents from advertising agencies working for tobacco companies¹ exposed as disingenuous the standard tobacco (and alcohol) industry arguments that advertising is only about expanding or protecting brand share, not total consumption, and that if there are any problems, industry self-regulation is the answer.

The analysis concluded that the aim was to increase consumption as well as brand share. Individual brands gain from market expansion, and therefore, deliberate plans were made to encourage it.

Other industry strategies included undermining government policy and evading regulation – for example, resisting and circumventing restrictions on advertising and tax increases on tobacco products.

The young were a key target, and imagery used in advertising was designed to attract them, although for public consumption, care was taken always to refer to the young adult market. The lifestyles, motivations and aspirations of young people were continuously assessed, concluding that young people smoked for emotional reasons and that the branding could meet their needs by adding aspiration, coolness and 'street cred' to the products. This in itself was counter to the regulatory code which stipulated that cigarette ads should not suggest that smoking was associated with social success or play on the susceptibilities of the emotionally vulnerable, especially the young.

The advertising agencies considered all aspects of marketing. Price, distribution and other commercial communications such as point of sale material and direct mail were brought into play to maximise the uptake and continuance of smoking and thus to increase sales.

Advertising and sponsorship became one, performing the same key task of promoting the all-important brand images that appeal to young smokers.

Voluntary, self-regulatory codes were treated cynically, the advertising agencies playing cat and mouse with the regulatory body, pushing to the limits and avoiding the rules whenever possible.

Analysis of alcohol industry internal documents

In 2009, the House of Commons Health Select Committee launched an inquiry into the conduct of the UK alcohol industry. As part of this investigation, the Committee gained access to internal marketing documents from both producers and their advertising agencies.

An analysis of these documents found:²

- There are major shortcomings in the self-regulatory codes for alcohol advertising, which mean the codes do not protect young people
- Young people are a clear target for alcohol advertisers
- Producers are well aware that segments of their market do drink irresponsibly and analyse this behaviour for market opportunities
- Advertisers seek to promote social success as a key element of brand campaigns
- Advertisers regularly appeal to masculinity and femininity
- Sponsorship is a large and powerful part of alcohol promotion
- New media are a fast-growing channel for alcohol advertising, however the rate of innovation and volume of user generated content makes regulation very difficult

Since 2009, there have been ongoing indications that the industry aims to increase consumption amongst existing drinkers, rather than advertising to maintain market share. In its 2013 *Annual Report* AB InBev claimed that its strategy aims to 'create new occasions to share our products with consumers', and to associate specific contexts with specific products to try to ensure that people drink on these occasions.³

In 2014, the British Beer Alliance, a consortium of major British brewers, launched the £10m marketing campaign *There's a Beer for That*, aiming to showcase 'the variety of beer available in the UK and how these different styles fit perfectly a wide range of occasions.' Diageo's 2018 report identified 'the rise of the aperitif occasion' as a new type of consumption occasion, which they have targeted by acquiring new brands.^{4,5}

¹ Hastings, G., and MacFadyen, L (2000)., 'Keep Smiling – No One's Going to Die. An Analysis of Internal Documents from the Tobacco Industry's Main UK Advertising Agencies. Centre for Tobacco Control Research', University of Strathclyde <http://www.tobaccopapers.com/keepsmiling/#_blank>

² Memorandum by Professor Gerard Hastings, Institute for Social Marketing, University of Stirling & the Open University [AL 81] (January 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

³ Anheuser-Busch InBev (2013), 2013 Annual Report <<https://tinyurl.com/guel27d>>

⁴ Diageo (2019), Annual Report 2018, p. 14, Market Dynamics <https://www.diageo.com/PR1346/aws/media/6212/b0000391_diageo_ar-2018_interactive.pdf>

⁵ Green, M. (2014), "'There's a Beer for That': biggest names in British beer unite for £10 million campaign", Off Licence News [Online]. 30 October. [Accessed 17 December 2015]. Available from: <<https://tinyurl.com/pvqlfbp>>

Alcohol marketing and children

Much of the debate around alcohol advertising concerns the effects on children and young people. In the UK, the proportion of children drinking alcohol remains well above the European average.¹ Evidence shows that exposure to alcohol marketing encourages children to drink at an earlier age and in greater quantities than they otherwise would. The Science Committee of the European Alcohol and Health Forum concluded in 2009 that ‘alcohol marketing increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol’.²

Advertising codes prohibit targeting of minors, but the ubiquity of alcohol advertising means that they can hardly miss it. A 2013 report from Ofcom found a gradual decline in exposure to television alcohol advertising for children aged 10–15 from 2002 to 2006, but from 2007 to 2011 there was an absolute increase in exposure.³ Research examining exposure to television alcohol advertising indicated that 10 to 15-year-olds in the UK were significantly more exposed to alcohol advertisements per viewing hour than adults (25 years and over).⁴ A 2019 report by the Children’s Parliament for Alcohol Focus Scotland highlighted the pervasiveness of alcohol, with half of the report’s 10 recommendations for an alcohol-free childhood concerning marketing.⁵

Cross-sectional studies in the UK have found that over 80% of 11–19-year-olds were aware of exposure to alcohol marketing in the past month, and those with more awareness of alcohol marketing were more likely to be higher-risk drinkers.⁶ In the same age group, participating with alcohol marketing on social media and participation with user-created promotion were also associated with higher-risk drinking.⁷ There is also evidence that underage drinking and the likelihood of alcohol problems in later life are closely related to positive expectations of benefits from alcohol use, precisely the expectancies advertising is designed to encourage.⁸ This is corroborated by systematic reviews of longitudinal studies which have concluded adolescents’ exposure to alcohol marketing is associated with subsequent alcohol use.^{9,10}

A number of studies have found that children and young people find alcohol marketing appealing. One study of the impact of alcohol advertising on teenagers in Ireland found:¹¹

- Alcohol advertisements were identified as their favourite type of advert by the majority of those surveyed
- Most of the teenagers believed that the majority of the alcohol advertisements were targeted at young people. This was because the advertisements depicted scenes – dancing, clubbing, lively music, wild activities – that identified with young people
- The teenagers interpreted alcohol advertisements as suggesting, contrary to the code governing alcohol advertising, that alcohol is a gateway to social and sexual success and as having mood altering and therapeutic properties

Beyond advertising, other types of alcohol marketing such as product placement are prevalent and the use of alcohol imagery in the media is widespread. A content analysis of alcohol content in reality TV shows popular with young people – including children – found 100% of episodes contained alcohol imagery.¹² Recent findings from the UK found that exposure to alcohol use in films was linked with higher risk of alcohol use and alcohol-related problems in adolescents.¹³ Such a link between alcohol use in movies and adolescent binge drinking was found to be relatively stable across cultures in a 2012 European study.¹⁴

With the proliferation of online streaming services, there has also been shown to be a ‘substantial potential’ for young people to be exposed to alcohol advertising.¹⁵ A recent study reviewing 50 episodes of the five highest-rated series on Netflix and Amazon Prime found 94% of episodes contained alcohol.¹⁶

Social media and online represent substantial marketing channels for many brands; in March 2018, Facebook was visited by 41 million unique users, Instagram by 23.1 million, Snapchat by 22.7 million in the UK,¹⁷ and people now spend on average an entire day a week online.¹⁸

The evidence on the effects of alcohol marketing on digital media is still emerging, but it is known that alcohol marketing on social media employs a number of distinct marketing methods.¹⁹ The research to date suggests that exposure to alcohol marketing through digital media is associated with alcohol consumption, and that the marketing materials are often attractive to young people.²⁰

In addition, there is evidence that current regulations are inadequate. UK research has found that while age verification can prevent individuals whose profile states they are under 18 years of age accessing alcohol marketing on Facebook, users of all ages can access alcohol marketing on Twitter and YouTube.²¹ Research from the United States (US) found YouTube profiles created for fictional users aged 14, 17 and 19 were able to subscribe to 100% of the alcohol brand YouTube pages explored.²² Research from Australia found the alcohol websites they investigated typically had poor filter systems for protecting underage visitors.²³

A recent ruling by the Advertising Standards Authority (ASA) dismissed complaints about a Heineken promotion on the account of an Instagram influencer. The ASA’s decision was based on the data provided by Heineken and the influencer to indicate their account does not have a substantial following of under 18s, however, Instagram’s age limit is 13 and there is no robust age verification of its users.²⁴

¹ Public Health England, (July 2016), ‘Data intelligence summary: Alcohol consumption and harm among under 18-year-olds’ p. 14

² 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’

³ Ofcom, (May 2013), ‘Children’s and young people’s exposure to alcohol advertising 2007 to 2011’, p. 7
<https://www.ofcom.org.uk/data/assets/pdf_file/0018/51507/alcohol_report_2013.pdf>

⁴ Patil, S., Winpenny, E., Elliott, M., Rohr, C., and Nolte, E. (2014), ‘Youth exposure to alcohol advertising on television in the UK, the Netherlands and Germany’, *The European Journal of Public Health*, 24: 4, pp. 561–565
<<http://eurpub.oxfordjournals.org/content/24/4/561>>

⁵ Alcohol Focus Scotland and Children’s Parliament (2019), ‘“It’s all around you all the time”: Children’s Parliament investigates an alcohol-free childhood’. Investigation for Alcohol Focus Scotland <<http://bit.ly/2phJ3az>>

⁶ Critchlow, N., MacKintosh, A. M., Thomas, C., Hooper, L., & Vohra, J. (2019), ‘Awareness of alcohol marketing, ownership of alcohol branded merchandise, and the association with alcohol consumption, higher-risk drinking, and drinking susceptibility in adolescents and young adults: a cross-sectional survey in the UK’. *BMJ Open*, 9(3), e025297.

⁷ Critchlow, N., MacKintosh, A. M., Hooper, L., Thomas, C., & Vohra, J. (2019), ‘Participation with alcohol marketing and user-created promotion on social media, and the association with higher-risk alcohol consumption and brand identification among adolescents in the UK’. *Addiction Research & Theory*, 1–12

⁸ Hill, L., and Casswell, S (2001)., “Alcohol Advertising and Sponsorship: Commercial Freedom and Control in the Public Interest” in Heather, N., Peters, J. S., and Stockwell, T (eds)., “International Handbook of Alcohol Dependence & Problems”, John Wiley & Sons

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¹⁰ Jernigan, D., Noel, J., Landon, J., Thornton, N., & Lobstein, T. (2017), ‘Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008’. *Addiction*, 112, 7-20

¹¹ Dring, C., Hope, A (November 2001)., ‘The Impact of Alcohol Advertising on Teenagers in Ireland’, Health Promotion Unit, Department of Health & Children

- ¹² Barker, A. B., Britton, J., Thomson, E., Hunter, A., Opazo, B. M., & Murray, R. L. (2019), 'A content analysis of tobacco and alcohol audio-visual content in a sample of UK reality TV programmes', *Journal of Public Health* (Oxford, England)
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- ¹⁴ Hanewinkel, R., Sargent, J., Poelen, E., Scholte, R., Florek, E., Sweeting, H., Hunt, K., Karlsdottir, S., Jonsson, S., Mathis, F. and Faggiano, F., (2012), 'Alcohol consumption in movies and adolescent binge drinking in 6 European countries'. *Paediatrics*, 129: 4, pp. 1–12
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<https://www.ofcom.org.uk/data/assets/pdf_file/0022/117256/CMR-2018-narrative-report.pdf>
- ¹⁸ Ofcom (August 2018), 'The Communications Market 2018', p. 14
<https://www.ofcom.org.uk/data/assets/pdf_file/0022/117256/CMR-2018-narrative-report.pdf>
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- ²² Barry, A., Johnson, E., Rabre, A., Darville, G., Donovan, K., and Efunbumi, O. (2014), 'Underage Access to Online Alcohol Marketing Content: A YouTube Case Study', *Alcohol and Alcoholism*, 50: 1, pp. 89–94
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- ²³ Jones, S., Thom, J., Davoren, S. et al. (2014), 'Internet filters and entry pages do not protect children from online alcohol marketing' *Journal of Public Health Policy*, (2014), 35: 1, pp. 75–90 <<http://doi:10.1057/jphp.2013.46>>
- ²⁴ The Telegraph (2019), Advertising watchdog accused of giving 'green light' for alcohol brand to 'blast' children with social media promotions, 7th September 2019
<<https://www.telegraph.co.uk/news/2019/09/07/advertising-watchdog-accused-giving-green-light-alcohol-brand/>>

Alcohol marketing and gender

A 2019 rapid literature review by Liverpool John Moores University for the Institute of Alcohol Studies examined how women are targeted and represented in alcohol marketing. There is, however, at present limited evidence on the effects of this either on drinking behaviours or on gender equity.¹

The report found that women around the world are targeted by the alcohol industry through a range of strategies. This includes creation of products aimed at women, using lifestyle messages that reinforce gender stereotypes, offering feminine accessories and using messages of empowerment.

Young women are among those targeted through interactive techniques on social media (competitions, photographs) to encourage content creation and interaction with and sharing of alcohol brand content.

The representation of women in alcohol marketing plays on both traditional gender stereotypes including sexualisation and objectification, as well as more contemporary representations of women as sexually active and empowered. The effects of these messages on drinking behaviour are not well understood.

The night-time environment is highly sexualised and marketing in this environment uses women's bodies and sexualities, for example through photographs of female patrons. Concerns exist that such content normalises the objectification and sexualisation of women, and as a result, may impact on attitudes towards and treatment of women within society as a whole (ie unwanted sexual attention, male entitlement to women's bodies, rape culture).

There is evidence of marketing in the night-time environment breaching self-regulatory codes, particularly those surrounding sex, sexual success and attractiveness. The ASA introduced new codes prohibiting causing offence through the use of gender stereotypes in 2019,² but these may also have limitations.

¹ Atkinson AM, Begley E, Jones L, Sumnall H (2019), 'A rapid narrative review of literature on gendered alcohol marketing and its effects: exploring the targeting and representation of women'

² ASA (2019), 'Advertising guidance on depicting gender stereotypes likely to cause harm or serious or widespread offence'. Available at: <<https://www.asa.org.uk/uploads/assets/uploaded/f39a881f-d8c9-4534-95f180d1bfe7b953.pdf>>

Alcohol sports sponsorship

Many high-profile sports events broadcast in the UK are sponsored by alcohol brands, including the FA and World Cups, UEFA Champions League, Rugby World Cup and Formula 1. Concerns have been raised about the high number of children this advertising may reach.¹ Carlsberg have been a sponsor of the England football team since 1986 and sponsored the team at the 2018 World Cup,² while Team GB were sponsored by Strongbow for the 2016 Olympic Games.³ Formula 1 racing has been found to have ‘the highest level of alcohol brand exposure of any sports event reported in peer reviewed literature.’⁴

It was reported that the jump in UK beer sales experienced during the Euro 2016 tournament was equivalent to an extra 31 million pints consumed by the country between April and June, compared with the same period in the previous year.⁵

Evidence suggests an association between alcohol sports sponsorship and harmful drinking among schoolchildren and sportspeople. A 2016 systematic review assessing the evidence on the relationship between alcohol sports sponsorship and alcohol consumption found that of seven studies identified, all indicated that exposure to alcohol sports sponsorship is associated with increased levels of consumption and risky drinking amongst schoolchildren and sportspeople.⁶

In light of the evidence around young people and alcohol sports sponsorship, in 2019, Scottish Women’s Football took the decision not to accept sponsorship from alcohol companies.⁷

Major medical and public health institutions in the UK currently call for a ban of alcohol sports sponsorship. Bans are in place in France and Norway, and in 2018 the Republic of Ireland introduced a law to restricting alcohol advertising at sports events and restricting sponsorship of driving or racing events.⁸ New Zealand is also considering proposals.⁹

¹ The Guardian (December 2014), “Protect Children – stop alcohol sponsorship of sport” Retrieved December 2016
<<https://www.theguardian.com/society/2014/dec/25/protect-children-stop-alcohol-sponsorship>>

² Carlsberg, ‘Official Beer of England’, retrieved October 2016
<<http://www.carlsberg.co.uk/#/football/uefa-euro-2016-football/4471-official-beer-of-england>>

³ The Guardian (August 2016), “Olympic sponsorship and alcohol don’t mix” Retrieved December 2016
<<https://www.theguardian.com/sport/2016/aug/07/olympic-sponsorship-and-alcohol-dont-mix>>

⁴ Institute of Alcohol Studies, Eurocare, and Monash University, (May 2015), ‘Alcohol advertising and sponsorship in Formula One: A dangerous cocktail’ p. 3

⁵ Green, M., (July 2016) ‘Euro 2016 helps beer sales to grow 4.8%’, Off Licence News, retrieved October 2016
<http://offlicencenews.co.uk/news/fullstory.php/aid/15903/Euro_2016_helps_beer_sales_to_grow_4.8_25.html>

⁶ Brown, K (2016), ‘Association between Alcohol Sports Sponsorship and Consumption: A Systematic Review Alcohol and Alcoholism 2016’, 1–9

⁷ Scottish Women’s Football (2019), ‘No Place For Alcohol Marketing In Sport’
<<https://scotwomensfootball.com/no-to-alcohol-marketing/>>

⁸ Houses of the Oireachtas (2018), *Public Health (Alcohol) Act 2018*
<<https://data.oireachtas.ie/ie/oireachtas/act/2018/24/eng/enacted/a2418.pdf>>

⁹ New Zealand Ministry of Health (2014) ‘Ministerial Forum on Alcohol Advertising and Sponsorship: Recommendations on Alcohol Advertising and Sponsorship’

Policies to regulate alcohol marketing

Alcohol advertising in the UK is subject to controls that seek to prevent advertisers targeting and appealing to young people. The controls cover broadcast, print and online advertising and are a mix of co-regulation (with Ofcom) and self-regulation, administered by the ASA and the Portman Group. The Portman *Code of Practice* covers marketing such as sponsorship, promotion and product.

Current codes of practice

Currently, the ASA is responsible for all advertising standards and consumer complaints, both broadcast and non-broadcast. As a result, all alcohol advertisements must adhere to the self-regulatory UK Code of Non-Broadcast Advertising, Sales Promotion and Direct Marketing (*CAP code*), and the co-regulatory UK Code of Broadcast Advertising (*BCAP code*) overseen by Ofcom*

The drinks industry funded body, the Portman Group, regulates all other forms of drinks producer marketing including naming, packaging, and promotion of alcoholic drinks. The sixth edition of the Portman Code was published in March 2019.¹ The Portman Group also released a first edition of *Code of Practice on Alcohol Sponsorship* in 2014.² This code states that: 'Prior to sponsoring an event, team or activity, drinks companies must use their reasonable endeavours to obtain data on the expected participants, audience or spectator profile to ensure that at least the aggregate of 75% are aged over 18.' However, even adhering to this standard, a substantial number of young people could be exposed to such sponsorship. For example, with Manchester United and Manchester City attracting 1.98 million viewers in 2015 for their tie, even if young people represent only 15% of this audience, that means 495,000 under 18s may have been exposed to advertising from Premier League sponsors, Carling.³

From 1 March 2011, the *CAP Code* has applied in full to marketing messages online, including the rules relating to misleading advertising, social responsibility and the protection of children. Journalistic and editorial content and material related to causes and ideas are excluded from the remit. Previously, the remit online was limited to paid-for ads (such as pop-ups and banner ads) and sales promotions wherever they appeared.

The remit covers:⁴

- Advertisers' own marketing messages on their own websites
- Marketing communications in other non-paid-for space under the advertiser's control, such as social networking sites like Facebook and Twitter
- Marketing communications on all UK websites, regardless of sector, type of businesses or size of organisation

* You can download the following documents from each advertising agency below:

The CAP code section on alcohol <https://www.asa.org.uk/type/non_broadcast/code_section/18.html>

The BCAP code section on alcohol <https://www.asa.org.uk/type/broadcast/code_section/19.html>

The Portman Group code on marketing

<<http://www.portmangroup.org.uk/codes/alcohol-marketing/code-of-practice/code-of-practice>>

The Portman Group code on alcohol sponsorship

<<http://www.portmangroup.org.uk/docs/default-source/recruitment-jds/sponsorship-code-booklet.pdf?sfvrsn=0>>

In December 2013, following research from Ofcom into children's exposure to alcohol advertising on television, the *Broadcasting Committee of Advertising Practice* published new, strengthened guidance on scheduling of such adverts.⁵

Despite these codes being in place complaints to the ASA have led to the removal of online marketing material for brands such as Frosty Jack, Jägermeister and Fireball whisky.⁶

Codes of practice in Europe

There are national restrictions and controls across Europe and mixtures of the statutory and the self-regulatory marketing systems. In terms of EU-wide legislation, this began with the *Television Without Frontiers Directive* (TWF) in 1989, which has been incorporated into national laws. This was designed to harmonise regulations.

The current *EU Directive 2010/13/EU* on the coordination of laws and regulations concerning the provision of audio-visual media (the *Audiovisual Media Services Directive* (AVMSD)), sets out criteria that commercial communication (television advertising, teleshopping, sponsorship and product placement) of alcohol and other commodities must comply with. These include that television advertising and teleshopping of alcohol must not be aimed at minors or depict minors drinking; it must not link alcohol with enhanced physical, sexual or social performance; and it must not encourage immoderate consumption. Such regulation will continue to apply to Britain until such time as the country leaves the European internal market.

Concerns were raised with the AVMSD, including the strength of the guidelines, an over-reliance on industry self-regulation, the exclusion of sponsorship and product placement as alcohol advertisements, and the movement of alcohol advertising across borders and regulatory environments (for example, advertising which is illegal in Sweden being broadcast on Swedish channels established in the UK). In recent years, a legislative proposal amending the AVMSD to improve the protection of children from harmful content on social media and video sharing platforms and to ensure the independence of regulators was put forward.⁷ This was adopted in 2018.⁸

The 2019 World Health Organisation (WHO) *European Status Report on Alcohol and Health* found that for advertising, partial restriction on content and/or placement is generally the most common type of regulation. For sponsorship, the report recommends legally-binding regulations on sponsorship, but voluntary agreements are the most common.⁹ For digital marketing to children, a WHO report highlights these restrictions are hard to define and to regulate.¹⁰ Some countries have introduced bans on forms of alcohol marketing, including Armenia, Estonia, France, Iceland, Lithuania, Norway, Russia, Sweden, Switzerland and Turkey – although the types of marketing that are banned varies.¹¹ Since 2015 Finland has had legislation restricting alcohol marketing on social media – the first in the world – however this has been difficult to regulate.¹²

Criticisms of the current UK regulatory system

The current regulatory system and codes of conduct have been criticised for a number of reasons:

1. Failure to protect children and young people from exposure to alcohol marketing

As part of its 2009 investigation into the conduct of the UK alcohol industry, the House of Commons Health Select Committee obtained access to internal marketing documents from both producers and their advertising agencies. The subsequent report concluded that the codes do not, as they are supposed to, protect young people from alcohol advertising; prevent the promotion of drunkenness and excess; or the linking of alcohol with social and sexual success.¹³

Five years on from this investigation, 29% of participants surveyed in a study of UK alcohol television adverts felt at least one advert presented to them breached the ASA *Code of Broadcast Advertising* rule that such advertising 'Must not appeal strongly to people under 18...reflecting or associated with youth culture or showing adolescent or juvenile behaviour.'¹⁴

2. Inadequacies in self-regulation systems

Again in the 2009 House of Commons Health Select Committee investigation into the conduct of the UK alcohol industry, the report concluded that there are: 'major shortcomings in the current self-regulatory codes covering alcohol advertising'.¹⁵

There have been some developments since this investigation; for example, a *Code* on sponsorship has been developed by the Portman Group. However a systematic review highlights violations of such guidelines are prevalent.¹⁶ A report from Alcohol Concern (now known as Alcohol Change UK) questioned whether the Portman Group's Independent Complaints Panel process is fit for purpose, highlighting a lack of consistency and objectivity of decision-making, and poor oversight and scrutiny of the panel.¹⁷

3. Weaknesses in regulating digital marketing

The codes are extremely weak in their treatment of new media which are rapidly becoming the biggest channel for alcohol promotion.¹⁸ For example, numerous studies have identified flaws in age verification filters used on websites¹⁹ and social media.^{20, 21} A recent decision by the ASA about alcohol marketing on the account of an Instagram influencer was the first decision made about this type of promotion and the decision was not to uphold the complaint risks setting a precedent for this type of marketing.²²

Calls for greater regulation: case study – the Loi Évin

Many health groups have called for greater restrictions on alcohol marketing to be introduced in the UK, such as those that are in place in France under the *Loi Évin*.

The articles relating to alcohol advertising in this French law may be summarised as follows:

A clear definition of alcoholic drinks is given:

- All drinks over 1.2% alcohol by volume are considered as alcoholic beverages

Places and media where advertising is authorised are defined:

- No advertising should be targeted at young people
- No advertising is allowed on television or in cinemas
- No sponsorship of cultural or sport events is permitted
- Advertising is permitted only in the press for adults, on billboards, on radio channels (under precise conditions), at special events or places such as wine fairs, wine museums

When advertising is permitted, its content is controlled:

- Messages and images should refer only to the qualities of the products such as degree, origin, composition, means of production, patterns of consumption
- A health message must be included on each advertisement to the effect that '*l'abus d'alcool est dangereux pour la santé*' – alcohol abuse is dangerous for health

While the *Loi Évin* is held up as an example of desirable alcohol marketing restrictions, there remain examples of how marketers circumvent these regulations. For example, an IAS report conducted by researchers at the University of Stirling investigated alcohol marketing during UEFA Euro 2016. The number of direct alcohol brand references was low, however there were numerous indirect references through 'alibi marketing', which involves distilling key features of a brand's slogan, colours or typeface and using these in marketing instead of presenting the logo or brand name.²³

The regulations also do not prevent children's exposure to alcohol content through product placement. For example, a 2019 study showed 88% of episodes of French TV series popular with teenagers depicted alcohol, higher than the proportion for US series.²⁴

WHO Global Alcohol Strategy – Marketing recommendations

The *WHO Global Strategy to Reduce the Harmful Use of Alcohol* was published in 2010. This Strategy, endorsed by all 193 Member States of the WHO, identified Marketing as a key policy area that required action at the national level in order to reduce the harm caused by alcohol. Below are the recommendations made by WHO in the Strategy:²⁵

Area 6. Marketing of alcoholic beverages

29. Reducing the impact of marketing, particularly on young people and adolescents, is an important consideration in reducing harmful use of alcohol. Alcohol is marketed through increasingly sophisticated advertising and promotion techniques, including linking alcohol brands to sports and cultural activities, sponsorships and product placements, and new marketing techniques such as e-mails, SMS and podcasting, social media and other communication techniques. The transmission of alcohol marketing messages across national borders and jurisdictions on channels such as satellite television and the Internet, and sponsorship of sports and cultural events is emerging as a serious concern in some countries.

30. It is very difficult to target young adult consumers without exposing cohorts of adolescents under the legal age to the same marketing. The exposure of children and young people to appealing marketing is of particular concern, as is the targeting of new markets in developing and low- and middle-income countries with a current low prevalence of alcohol consumption or high abstinence rates. Both the content of alcohol marketing and the amount of exposure of young people to that marketing are crucial issues. A precautionary approach to protecting young people against these marketing techniques should be considered.

31. For this area policy options and interventions include:

(a) Setting up **regulatory or co-regulatory frameworks, preferably with a legislative basis**, and supported when appropriate by self-regulatory measures, for alcohol marketing by:

- i. Regulating the content and the volume of marketing;
- ii. Regulating direct or indirect marketing in certain or all media;
- iii. Regulating sponsorship activities that promote alcoholic beverages;
- iv. Restricting or banning promotions in connection with activities targeting young people;
- v. Regulating new forms of alcohol marketing techniques, for instance social media;

(b) Development by public agencies or independent bodies of effective systems of surveillance of marketing of alcohol products;

(c) Setting up effective administrative and deterrence systems for infringements on marketing restrictions.

WHO ‘Best Buys’ – marketing recommendations

In 2017, WHO published ‘Best Buys’ and other recommended interventions to prevent non-communicable diseases, covering modifiable risk factors including reducing the harmful use of alcohol.²⁶

The WHO’s ‘Best Buys’ adopted a stronger position on alcohol marketing restrictions than in the 2010 strategy, making the following recommendation:²⁷ **To enact and enforce bans or comprehensive restrictions on exposure to alcohol advertising (across multiple types of media).**

¹ The Portman Group (March 2019), ‘Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks, Sixth Edition’ <<http://www.portmangroup.org.uk/codes/alcohol-marketing/code-of-practice/code-of-practice>>

² The Portman Group (January 2014), ‘Code of Practice on Alcohol Sponsorship, First Edition’ <<http://www.portmangroup.org.uk/docs/default-source/recruitment-jds/sponsorship-code-booklet.pdf?sfvrsn=0>>

³ The Mirror (November 2015), ‘Which televised Premier League matches have attracted the most viewers this season?’ <<http://www.mirror.co.uk/sport/football/news/televised-premier-league-matches-attracted-6863816>>

⁴ Advertising Standards Authority [ASA] (September 2010), ‘Landmark agreement extends ASA’s digital remit’ <http://www.asa.org.uk/News-resources/Media-Centre/2010/ASA-digital-remit-extension.aspx#_blank>

⁵ BCAP (December 2013), ‘Identifying TV programmes likely to appeal to children, Advertising Guidance (broadcast)’, retrieved November 2016 <<https://tinyurl.com/hty2xnv>>

⁶ Alcohol Concern (2016), ‘Youth Alcohol Advertising Council’, retrieved November 2016, <<https://www.alcoholconcern.org.uk/advertising-and-the-young>>

⁷ European Commission (December 2018), ‘Revision of the EU audio visual media services directive (AVMSD)’ <<https://ec.europa.eu/digital-single-market/en/revision-audiovisual-media-services-directive-avmsd>>

⁸ European Commission (December 2018), ‘Revision of the EU audio visual media services directive (AVMSD)’ <<https://ec.europa.eu/digital-single-market/en/revision-audiovisual-media-services-directive-avmsd>>

⁹ WHO Europe (2019), ‘Status report on alcohol consumption, harm and policy responses in 30 European countries 2019’ <<http://bit.ly/2oCbIGU>>

¹⁰ WHO Europe (2018), ‘Monitoring and restricting digital marketing of unhealthy products to children and adolescents’ <<http://bit.ly/2nQTLEA>>

¹¹ WHO (2018), ‘Global Health Observatory Data Repository (European Region) – Advertising and product placement restrictions’ <<http://apps.who.int/gho/data/node.main.euro.A1131?lang=en&showonly=GISAH>>

¹² Kaupila, E., Lindeman, M., Svensson, J., Hellman, M., & Katainen, A. (2019), ‘Alcohol marketing on social media sites in Finland and Sweden. A comparative audit study of brands’ presence and content, and the impact of a legislative change’. University of Helsinki: Faculty of Social Sciences

<<http://eucam.info/wp-content/uploads/2019/04/Alcohol-marketing-on-social-media-sites-in-Finland-and-Sweden-2019.pdf>>

¹³ Memorandum by Professor Gerard Hastings, Institute for Social Marketing, University of Stirling & the Open University [AL 81] (January 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

¹⁴ Searle, R., Alston, D., and French, D. (2014), ‘Do UK Television Alcohol Advertisements Abide by the Code of Broadcast Advertising Rules Regarding the Portrayal of Alcohol?’, *Alcohol and Alcoholism*, 49: 4, pp. 472–478

¹⁵ Memorandum by Professor Gerard Hastings, Institute for Social Marketing, University of Stirling & the Open University [AL 81] (January 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

¹⁶ Noel, J. K., Babor, T. F., & Robaina, K. (2017), Industry self-regulation of alcohol marketing: a systematic review of content and exposure research. *Addiction*, 112, 28–50

¹⁷ Alcohol Concern (2018), ‘Fit For Purpose? An analysis of the role of the Portman Group in alcohol industry self-regulation’ <<http://bit.ly/2n2KdWS>>

¹⁸ Memorandum by Professor Gerard Hastings, Institute for Social Marketing, University of Stirling & the Open University [AL 81] (January 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

¹⁹ Jones, S., Thom, J., Davoren, S. et al. (2014), ‘Internet filters and entry pages do not protect children from online alcohol marketing’ *Journal of Public Health Policy*, (2014), 35: 1, pp. 75–90 <<http://doi:10.1057/jphp.2013.46>>

²⁰ Winpenny, E. M., Marteau, T. M., & Nolte, E. (2013), ‘Exposure of children and adolescents to alcohol marketing on social media websites’, *Alcohol and Alcoholism*, 49(2), 154–159

²¹ Barry, A., Johnson, E., Rabre, A., Darville, G., Donovan, K., and Efunbumi, O. (2014), ‘Underage Access to Online Alcohol Marketing Content: A YouTube Case Study’, *Alcohol and Alcoholism*, 50: 1, pp. 89–94 <<http://dx.doi.org/10.1093/alcalc/agu078>>

²² The Telegraph (2019), ‘Advertising watchdog accused of giving ‘green light’ for alcohol brand to ‘blast’ children with social media promotions’ 7th September 2019 <<https://www.telegraph.co.uk/news/2019/09/07/advertising-watchdog-accused-giving-green-light-alcohol-brand/>>

²⁵ World Health Organisation [WHO] (2010), ‘Global strategy to reduce the harmful use of alcohol’ <http://www.who.int/substance_abuse/activities/gsrhual/en/#_blank>

²⁶ World Health Organisation (2017). ‘Tackling NCDs: “Best buys” and other recommended interventions for the prevention and control of noncommunicable diseases’ <<https://apps.who.int/iris/bitstream/handle/10665/259232/WHO-NMH-NVI-17.9-eng.pdf?sequence=1>>

²⁷ World Health Organisation (2017). ‘Tackling NCDs: ‘Best buys’ and other recommended interventions for the prevention and control of noncommunicable diseases’ <<https://apps.who.int/iris/bitstream/handle/10665/259232/WHO-NMH-NVI-17.9-eng.pdf?sequence=1>>

