

Consultation on advertising alcohol alternatives

Consultation response by the Institute of Alcohol Studies

We welcome the opportunity to respond to this consultation.

The Institute of Alcohol Studies (IAS) is an independent institute bringing together evidence, policy and practice from home and abroad to promote an informed debate on alcohol's impact on society. Our purpose is to advance the use of the best available evidence in public policy decisions on alcohol. IAS is a member of the Alcohol Health Alliance UK (AHA), an alliance of more than 60 non-governmental organisations.

We support and endorse the AHA's response to this consultation. In particular, we would like to highlight the concerns about brand sharing and cross-promotion. All marketing of alcohol alternatives that share branding with alcoholic products should be considered cross-promotional. While the guidance recommends focussing on the alcohol-free product (rather than the brand), it is very difficult to discern how this is possible in practice as brands have now become the dominant feature of marketing.¹

Brand identity is much more sophisticated than simply brand names and logos and research has demonstrated that people can easily identify alcohol brands from visual cues such as font type, straplines or colour, even when the brand name itself is absent.² Marketing communications do not need to directly promote an alcohol product to be successful in promoting an alcohol brand, or alcohol consumption more generally.

We therefore recommend that the guidelines focus on regulating brands rather than ABV, and make no- and low-alcohol products from 'parent brands' subject to the same restrictions as their alcoholic products despite the lower alcohol content.

Moreover, there is currently insufficient evidence as to how no/low alcohol products are used – while they might act as 'alternative', they can also be 'additional' or risk being a gateway drink.³ As they are likely to serve different functions for different people, the suggested definition is too vague. There are furthermore inconsistencies with Government guidelines on low alcohol descriptors. We therefore recommend amending the definition as follows:

“Alcohol alternatives are drinks containing 0.5% or less alcohol by volume when presented as no and low alcohol versions of an alcoholic drink, for example non-alcoholic beer. A specific drink or range of drinks would be considered an alcohol alternative if it does not share the same branding elements as an alcohol brand.”

For further information and detailed evidence, please see the response from the Alcohol Health Alliance UK.

¹ Casswell, S., & Maxwell, A. (2005). Regulation of alcohol marketing: a global view. *Journal of Public Health Policy*, 26(3), 343-358.

² Youth Alcohol Policy Survey (2019). YouGov surveyed a total of 3,388 young people aged 11-19. This research focusses on 2,603 11-17-year-olds. Fieldwork was undertaken between September to November 2019. The survey was carried out online. The figures have been weighted and are representative of the national profile of the UK population by age, gender, ethnicity, region and Index of Multiple Deprivation (IMD) deciles.

³ Corfe, S. et al. (2020). [Alcohol-free and low-strength drinks](#).