

Alcohol advertising

Background

This is a snapshot of alcohol policies in twenty five member states¹ of the European Union as at 31 December 2007. The data were collected as a joint initiative between the World Health Organization and the European Union as part of the World Health Organization's global alcohol database. Further information was taken from and is available in two publications of the World Health Organization: Evidence for effectiveness and cost-effectiveness of interventions to reduce alcohol-related harm [<http://www.euro.who.int/document/E92823.pdf>], and handbook for action to reduce alcohol-related harm [<http://www.euro.who.int/Document/E92820.pdf>].

The Alcohol Policy Series includes the following ten fact sheets documenting the state of the European Union's member state alcohol policy:

1. Infrastructures for alcohol policy
2. Price and tax measures
3. Awareness raising activities
4. Counselling and treatment
5. Availability regulations
6. Drink driving legislation
7. Health warning labels
8. Alcohol advertising
9. Alcohol sponsorship
10. Monitoring and evaluation.

The present fact sheet deals with alcohol advertising and considers three issues:

1. The evidence for the impact of alcohol advertising
2. The current situation
3. Considerations and next steps

¹ Austria; Belgium; Bulgaria; Cyprus; Czech Republic; Denmark; Estonia; Finland; France; Germany; Hungary; Ireland; Italy; Latvia; Lithuania; Malta; Netherlands; Poland; Portugal; Romania; Slovakia; Slovenia; Spain; Sweden; and United Kingdom

1. EVIDENCE BASE

The marketing of alcohol is an enormous activity in itself. A full marketing strategy includes not only advertising and promotional activities, but it also involves product development, price-setting, distribution and targeting different market segments with different products. Moreover, alcohol is no longer marketed only through traditional broadcast media (such as television and radio) and traditional non-broadcast media (such as print media, billboards and branded merchandise). It is also promoted by linking alcohol brands to sports and cultural activities through sponsorships and product placements, and by direct marketing using technologies such as the Internet, podcasts and text messaging. In addition, the entire entertainment sector plays a role in shaping the expectations of young people for the use of alcohol through its portrayal of alcohol in films, television shows, songs and other cultural productions. Finally, stakeholder marketing – including socially responsible actions, social marketing and health education activities funded, promoted and implemented by the alcohol industry – is also part of the marketing mix. Accordingly, any effort to regulate alcohol marketing should be comprehensive and address all these elements. Restricting only one aspect of the marketing mix often results in an expansion of activity in the other parts of the mix. That is why the EU ultimately implemented a comprehensive ban on all forms of tobacco marketing.

Both the content of alcohol marketing and the amount of exposure to it are critical issues for young people, who are particularly susceptible to alcohol's harmful effects. Marketing content is designed to generate a positive emotional response. Young people's interest in specific aspects of marketing materials, such as humour, animation, and popular music, contributes significantly to the materials' overall effectiveness. Generally, there is a dose-response relationship between young people's exposure to alcohol marketing and the likelihood that they will start to drink or drink more. The greater the exposure, the greater the impact. The evidence thus suggests that limiting the kind and amount of alcohol marketing would reduce drinking initiation and heavy drinking among young people. One difficulty is that changes to alcohol marketing regulations, whether by restricting or liberalizing them, have not been studied scientifically. Attempts have been made to investigate whether jurisdictional differences in alcohol advertising expenditures or regulations affect consumption. The difficulty with such studies is that they are only able to examine small differences, and it has not been possible to isolate specific influences on young people's behaviour. While jurisdictions with higher expenditures on alcohol advertising have been found to consume alcohol at higher rates, the observed effects are only small.

Although many jurisdictions regulate the content of alcohol advertisements, their regulations do not always reflect knowledge of how young people respond to advertising. Often when an advertisement is challenged for not satisfying an existing code, the code ends up being interpreted too literally, rather than taking into account how young people actually perceive the advertisement. For example, since elements such as humour, animation and popular music contribute to the effectiveness of advertisements that promote alcohol, they should be addressed in the regulatory codes. Because it can be quite difficult for advertising codes to specify everything that should not be permitted in alcohol advertising, some countries (e.g. France) have chosen to specify what it *can* include, since that is much clearer to monitor and enforce.

Some jurisdictions restrict young people's exposure to alcohol marketing through the use of "watersheds" (specifying e.g. no alcohol advertisements on television before a certain time), or permitting the broadcasting of alcohol advertisements only when the audience is projected to contain a smaller proportion of young people than the general population does. However, given the

dose–response relationship between exposure level and impact for a given advertisement, these regulations likely do not go far enough. In addition, many forms of exposure often remain unregulated, for example the portrayal of alcohol use in films, product placement in films and on television shows, advertising on the Internet and advertising through mobile communication devices. For these reasons, some jurisdictions have either restricted certain forms of alcohol marketing altogether – e.g. prohibiting it from television and cinemas, or forbidding sports sponsorships (as France has done) – or actually banned all forms of alcohol advertising (as the EU has done with tobacco advertising).

In some jurisdictions, alcohol marketing is controlled through self-regulation by the relevant economic operators, including advertisers, the media and alcohol producers. To be effective, however, self-regulation requires a clear legislative framework. Furthermore, a self-regulatory system needs sufficient incentives to succeed; in general, self-regulatory systems are most active where pressure from the government or from lawsuits is greatest. As with government regulation, self-regulation should cover the entire range of marketing activity that reaches young people, to prevent advertisers from simply using newer media to escape regulations. Input from the general public, and especially from vulnerable groups such as young people, should be included in evaluating advertisements, since several studies have found that voluntary self-regulation does not eliminate marketing that affects younger people. Self-regulation can only work as long as there is provision for third-party review of complaints concerning violations. Sanctions and the threat of sanctions are needed to ensure compliance. Monitoring of alcohol marketing practices should be the responsibility of an independent body or a government agency, and it should be performed systematically and routinely.

2. CURRENT SITUATION

Twenty four countries had some form of legally binding regulations on alcohol advertising at the national level and one at the sub-national level. Sixteen countries had some form of legally binding regulations on product placement at the national level and one at the sub-national level. The numbers of countries with specified regulations are summarized in Tables 1-3.

Table 1 Restrictions on advertising / product placement BEER

	Total ban	Partial statutory restriction	Voluntary agreement / self-regulation	No restriction
Advertising:				
Public service/national TV	4	16	2	3
Commercial/private TV	2	18	2	3
National radio	2	17	3	3
Local radio	1	18	3	3
Printed newspapers/ magazines	1	11	6	5
Billboards	1	9	5	7
Points of sale	0	10	5	8
Cinema	3	10	4	6
Internet	2	9	4	8
Product placement:				
Public service/national TV	7	7	2	8
Commercial/private TV	5	7	3	8

Table 2 Restrictions on advertising / product placement WINE

	Total ban	Partial statutory restriction	Voluntary agreement / self-regulation	No restriction
Advertising:				
Public service/national TV	15	15	1	4
Commercial/private TV	3	18	1	3
National radio	3	16	2	4
Local radio	2	17	2	4
Printed newspapers/ magazines	2	10	5	6
Billboards	3	8	4	7
Points of sale	0	10	4	9
Cinema	4	9	3	7
Internet	3	8	3	9
Product placement:				
Public service/national TV	7	7	1	9
Commercial/private TV	5	7	2	9

Table 3 Restrictions on advertising / product placement SPIRITS

	Total ban	Partial statutory restriction	Voluntary agreement / self-regulation	No restriction
Advertising:				
Public service/national TV	9	13	1	2
Commercial/private TV	7	14	1	3
National radio	7	14	2	2
Local radio	6	15	2	2
Printed newspapers/ magazines	5	8	5	5
Billboards	6	6	4	6
Points of sale	2	8	5	8
Cinema	7	7	3	6
Internet	5	6	4	8
Product placement:				
Public service/national TV	8	7	2	7
Commercial/private TV	6	7	3	7

The mean (sem) level of enforcement for advertising restrictions on a scale of 0 (not enforced) to 10 (fully enforced) was 6.5 (0.5) and for product placement 6.4 (0.6). In only one country was the basis of the judgement based on statistical information for advertising and in one for product placement.

3. CONSIDERATIONS AND NEXT STEPS

It is clear that there is considerable room for strengthening across the countries of the European Union in terms of the structure and implementation of the regulations concerning the advertising and product placement of alcoholic beverages.

1. ***Have there been any reviews or documentation of commercial communications on alcohol?*** Such materials should address both the volume and breadth of these communications, including estimates of direct expenditure and estimates of the extent of commercial communications through for example the Internet and mobile communication devices. It is not easy to obtain such information, and some people have argued that the alcohol industry should make it publicly available. An overall picture of the alcohol marketing mix enables better regulation, as well as better monitoring of the impact of regulation.
2. ***Have existing regulations for alcohol marketing been thoroughly analysed for efficiency and effectiveness?*** Such an analysis should examine how the existing regulatory systems can be improved. There is an enormous array of applicable regulations and regulatory

systems in the European Region, many of which have not been analysed or documented. There is a risk that some marketing practices may fall outside the various regulatory systems and thus effectively avoid being regulated or monitored.

3. ***Have any in-depth scientific studies examined the impact of existing regulatory systems for alcohol marketing?*** Regulatory and self-regulatory bodies, where they exist, often produce reports, but they frequently describe only processes, rather than their ability to manage alcohol marketing and its effects on young people.
4. ***Are there any studies of young people and how they experience commercial communications on alcohol? Are young people involved in the adjudication of advertising codes?*** Evidence suggests that young people interpret alcohol advertising in ways that are not reflected in such codes, and that they can get different messages and meanings from advertising than what content regulations capture. It is thus critical to involve young people in the analysis and interpretation of marketing practices to obtain a full picture of their likely impact. Some standardized instruments have been developed to monitor young people's interpretations of alcohol marketing practices (see ELSA, 2009).
5. ***Do independent bodies adjudicate alcohol marketing codes?*** One common problem with self-regulatory codes is that adherence is overseen by the very people who are paying for or creating the marketing efforts, making it very difficult for them to act objectively. Another widespread problem is the timeliness of the complaints process. Very often, complaints are only registered and the relevant marketing campaign adjudicated some time after the campaign has been launched, sometimes not even until the campaign is over. In such cases, adjudication is of little consequence.
6. ***Are code violations punished by effective sanctions?*** Some advertising codes lack sanctions, or their punitive sanctions are so meagre that adjudication is again inconsequential.

Options for action

- ***Maintain the status quo*** and do not change the systems for regulating alcohol marketing. Note however that almost without exception, such systems can still be reviewed and made more efficient, to the benefit of public health.
- ***Undertake a thorough review and analysis of existing systems to streamline them, to implement changes that make them more effective in controlling content and volume of exposure, and to strengthen monitoring and enforcement.*** Such a review should also ensure that no alcohol marketing practices fall outside the control of regulatory systems and thus go unregulated.
- ***Further restrict the content and volume of commercial alcohol communications,*** for example by only allowing those that describe the product directly, or by banning all such communications in the primary media of television, radio, films and sports sponsorships. The latter path is what the French *Loi Évin* does, a law that the European Court of Justice supported when it was challenged.
- ***Ban all forms of commercial alcohol communications,*** with the exception of media such as trade journals. The EU has now taken this step for tobacco.

Stakeholders for action

- The ministry of health is the most important government stakeholder, since it is responsible for ensuring that public health objectives are integrated into all efforts to regulate alcohol marketing.
- Its main partners are the ministries responsible for regulating commercial communications through broadcast media, non-broadcast media and telecommunications, including the

Internet. In addition, the ministries responsible for culture, sports and children may need to be involved. To ensure that all forms of marketing are dealt with and that no marketing medium escapes regulation, it may be beneficial to convene a permanent task force to review and monitor the relevant regulations.

- Other stakeholders include any bodies that the government may have established to oversee and monitor advertising standards. Again, if different bodies oversee different media, an overall task force is needed.
- Alcohol producers, retailers and the marketing industry are normally consulted when the government makes changes in alcohol marketing regulations and practices. However, the published record indicates that these industries do not support tighter restrictions on marketing practices, at least not publicly.

Bibliography

Anderson P (2009). *Evidence for the effectiveness and cost-effectiveness of interventions to reduce alcohol-related harm*. Copenhagen, WHO Regional Office for Europe.

This report, a companion document to the present handbook, details the available evidence for the impact of alcohol marketing on alcohol consumption and related harm.

Enforcement of National Laws and Self-Regulation on Advertising and Marketing of Alcohol (ELSA) (2009). Welcome to the ELSA website [web site]. Utrecht, ELSA (<http://stap.nl/elsa>, accessed 12 August 2009).

The ELSA project, an initiative cofinanced by the European Commission, has produced a series of publications on alcohol marketing and its regulation. These publications are available on the project web site.

European Centre for Alcohol Marketing (EUCAM) (2009). EUCAM [web page]. Utrecht, EUCAM (<http://eucam.info>, accessed 12 August 2009).

EUCAM regularly reports on trends in alcohol marketing in the European Region, as well as describing alcohol marketing regulations in the Region.

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*. Luxembourg, European Communities (http://ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/docs/science_o01_en.pdf, accessed 12 July 2009).

The Science Group of the European Commission's Alcohol and Health Forum prepared this review of the impact of alcohol marketing.

WHO (2009). WHO-CHOICE interventions: hazardous alcohol use [web page]. Geneva, WHO (http://www.who.int/choice/interventions/rf_alcohol, accessed 11 August 2009).

The WHO-CHOICE project has modelled the cost, impact and cost-effectiveness of a range of alcohol policy measures in reducing alcohol-related harm, including alcohol advertising bans. Several publications discuss the results (see Anderson, 2009).

This fact sheet was prepared by Peter Anderson on behalf of the German Centre for Addiction Issues (DHS) as part of the Building Capacity project managed by the Institute of Public Health of the Republic of Slovenia, co-financed by the European Commission. Unless otherwise stated all data is sourced from the WHO Global Information System on Alcohol and Health (GISAH). The data was collected in the framework of the Global Survey on Alcohol and Health implemented by the WHO Department of Mental Health and Substance Abuse (Management of Substance Abuse team) in collaboration with WHO Regional Office for Europe and the European Commission.

With the support of



Generalitat de Catalunya
Departament de Salut

Co-financed by



European Commission