



Assessment of young people's exposure to alcohol marketing in audiovisual and online media

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Preface

The European Commission Health and Consumer Directorate-General (DG SANCO) commissioned RAND Europe, by way of the Executive Agency for Health and Consumers (EAHC), in the framework of the Health Programme (No SC 2011 63 02), to carry out an assessment of young people's exposure to alcohol marketing through television and online media.

Drawing on a range of methodological approaches, work presented in this report provides a quantitative exposure assessment using viewership and advertising data and an analysis of alcohol portrayals in television advertising in the UK, the Netherlands and Germany, alongside an exploration of exposure to online alcohol advertising in the UK. Findings of this work seek to inform the development of effective regulatory policies (including self-regulation) to protect young people. The findings also inform approaches for monitoring changes over time and enable comparative work, between and within populations.

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Summary

Alcohol use among young people, and adolescents in particular, is an increasing concern in Europe. Children and adolescents have greater vulnerability to alcohol than adults and there is increasing evidence of the impact of drinking on young people's health, both short and long term, including the increased likelihood of being in a risky situation when drunk. There are many factors that may encourage alcohol use among young people, and alcohol marketing has been identified as one potential influence. Evidence strongly suggests that alcohol advertising will increase the likelihood that adolescents will start to drink alcohol at a young age and may increase alcohol use among those who already consume alcohol.

It is against this background that the European Commission Health and Consumer Directorate-General (DG SANCO), by way of the EAHC, has commissioned RAND Europe to carry out an assessment of young people's exposure to alcohol marketing through television and online media. The overall aim of the work presented in this report was to use novel approaches to measure alcohol advertisement exposure among young people in Europe through audiovisual and online media.

Our analyses used a range of methods. First, to assess young people's exposure to alcohol marketing in television, we used commercially available data on television audiences ('viewership') and on alcohol advertising in the UK, the Netherlands and Germany. We applied descriptive statistics and regression analysis to estimate the exposure of young people to alcohol advertising compared with that of adults. Second, we analysed alcohol advertising portrayals of a sample of alcohol adverts broadcast in each of the three countries to better understand the extent to which advertisements are using elements that have been identified as appealing to young people. In a third step, we assessed the extent to which alcohol portrayals in these adverts adhere to national statutory or voluntary codes on (alcohol) advertising in each country, and with policies developed by alcohol manufacturers themselves. Fourth, we explored exposure to alcohol marketing in online media, here focusing on the UK. We examined data on online media channels accessed by young people, described the main types of social media marketing messages for alcoholic beverages, and assessed the use of age gates to restrict content to those over the legal drinking age.

Adolescents in the UK and the Netherlands were more likely than adults to be exposed to alcohol advertising on television. In Germany adolescents had a lower exposure to alcohol adverts than adults.

Young people in the UK (ages 10–15 years) and the Netherlands (13–19 years) were exposed to significantly more alcohol advertising compared to adults, than would be expected given their viewership patterns. In the UK, this age group was exposed to 11 per cent more alcohol advertising than adults (aged 25 years and older) (incidence rate ratio IRR of 1.11). Patterns varied by the type of alcoholic beverage. Associations were strongest for ready-mixed drinks, with young people exposed to 51 per cent more advertising than adults. Among those aged 16–24 years, exposure to alcohol advertising was only 2 per cent higher than among adults.

In the Netherlands, among young people aged 13–19 years, exposure to alcohol advertising was also significantly higher than for adults aged 20 years and older, by 29 per cent. Similar to the UK, exposure differed by alcoholic beverage, with associations strongest for wines (63 per cent higher exposure) and spirits (45 per cent).

In Germany, by contrast, levels of exposure were 21 per cent lower for young people aged 10–15 years than for adults aged 25 years and older. Exposure to alcohol advertising was not significantly different from adults for those aged 16–24 years. The only exception was for ready-mixed drinks, where we observed exposure to be 39 per cent higher in this age group than for adults.

In all three countries, very young viewers (UK 4–9 years; Netherlands 6–12 years; Germany 4–9 years) were found to have significantly lower exposure to alcohol adverts than adults.

Many television alcohol adverts contained content considered appealing to young people, with some variation observed between the UK, the Netherlands and Germany.

Alcohol advertising portrayals on television in the UK, the Netherlands and Germany frequently included content considered appealing to young people. The features most commonly identified were use of music and people characters, followed by use of special technological effects. Use of cartoons or animation was not observed in any of the adverts studied.

There were differences across countries, however. Adverts containing features considered appealing to youth appeared to be more common in the UK. Also, adverts tended to focus on the qualities associated with consuming the drink (eg smooth or refreshing) and the occasions where drinks would be consumed. Conversely, in Germany and the Netherlands, adverts frequently focused on the features of the drink itself, for instance its history, production or ingredients.

Assessing advert content against national statutory or voluntary codes on (alcohol) advertising in each country, we found only a few instances where adverts might be considered to pose a direct violation of regulations. Where such instances were identified, the extent to which relevant stipulations applied was not clear because of poorly specified detail of corresponding regulation, whether statutory or voluntary. This lack of specificity was most apparent in stipulations stating that advertisements should not include elements

that are appealing to youth. We applied the evidence of the literature that has identified such elements on a sample of adverts in the countries under review. This identified instances of violations of these stipulations in all adverts assessed, as they contained at least one of these elements, most frequently use of music, people characters and technological effects.

Social media case studies of a selection of alcohol brands showed that these all have considerable online media presence featuring both marketer-generated and user-generated content.

Facebook, YouTube and Twitter were the three social media sites most used by young people. We analysed five alcohol brands, which all maintained a Facebook page, YouTube channel and Twitter account. Facebook features included profile pages for comments by marketers and users, and additional content such as competitions, videos, recipes or applications such as games, inviting users to engage with marketer content. Similarly, marketer-generated YouTube sites contained a variety of videos related to the product, including adverts, and in one case comedy videos. Twitter accounts contained tweets by the marketer and others, relating to the product, but also tweets on a variety of other subjects including comedy, fashion and recipes.

Use of age verification mechanisms to restrict access to alcohol-related content are used by alcohol marketers and social media providers but their effectiveness remains uncertain.

All alcohol brands studied maintained a dedicated brand website but their content varied. Brand online appearance has changed over time, with a general trend towards a reduced range of content, with some suggestion that online content may have been moved to social media websites.

Age restrictions to alcohol brand content varied across sites. Facebook users with a profile age of under 18 years were unable to access marketer-generated alcohol brand pages, although most user-generated content and some brand-generated applications remained accessible. YouTube and Twitter did not maintain age restriction; in most cases users of all ages were able to view and interact with brand content.

There is a need to better understand the relationship between national frameworks influencing programming and advertising behaviours and their impact on youth exposure to alcohol advertising.

Within the scope of this study it was only possible to study exposure to alcohol advertising on television in three countries in detail. It will be important to repeat analyses for a broader range of countries to better understand the relationship between national frameworks influencing programming and advertising behaviours and their impact on youth exposure to alcohol advertising. Findings for Germany appear to suggest that higher exposure to alcohol advertising among young people is not inevitable and it will be necessary to identify the factors underlying this observation if we are to inform policy development in Member States and the European Union more broadly. A larger sample of countries would also be helpful to inform development of those policy instruments which are likely to have the greatest effect in reducing exposure to alcohol advertising among young people.

Glossary

Advertising	The placement of announcements and persuasive messages in time or space purchased in any of the mass media by those who seek to inform and/or persuade members of a particular target market or audience about their products, services, organisations or ideas. (American Marketing Association)
Age gate	See ‘age verification page’.
Age verification page	A website landing page which requires visitors to confirm they are of a certain age before they can enter the website. (Portman Group)
Classified advertising (online)	Small advertisements that are grouped by subject and appear under categorical headings. They are typically published on dedicated websites such as www.classifiedads.com . The ads are searchable and generally specific to a particular locality.
Click-through	When a user interacts with an advertisement and clicks through to the advertiser’s website. (Internet Advertising Bureau (IAB), UK)
Click-through rate	Frequency of click-throughs as a percentage of impressions served. Used as a measure of advertising effectiveness (see ‘impression’). (IAB, UK)
Daypart	A section of the television viewing day, for example breakfast (06.00–09.24) or peak time (for which there are various definitions). (Broadcasters’ Audience Research Board (BARB), UK)
Display advertisement (online)	A banner or box typically found adjacent to web page content, at the top, bottom or down the side of a web page.
Impact	A measure of viewing of adverts. One impact refers to one member of the target audience viewing one advert. Impacts are summed to give, for example, the total impacts delivered by a particular spot, the gross total achieved by a particular advertising campaign or the total supplied by a given channel. A total of ten impacts could correspond to ten people viewing a single advert; one person seeing the advert ten times; or five people seeing the advert twice, etc. (BARB)

Impression	See 'impact'.
Marketing	An organisational function and set of processes for creating, communicating and delivering value to customers and for managing customer relationships in ways that benefit the organisation and its stakeholders. (American Marketing Association)
Online media	Digital media, including text, photos, videos and music, that are distributed over the internet.
Paid search	Allows advertisers to bid for placement in the paid listings search results on terms that are relevant to their business. Advertisers pay the amount of their bid only when a consumer clicks on their listing. (IAB, UK)
People meter	An electronic device wired to a television set and used to record the channel selections made by individual viewers. (Merriam-Webster)
Reach	The number of unique web users potentially seeing a website one or more times in a given time period expressed as a percentage of the total active web population for that period. (IAB, UK)
Social media	Online platforms that enable people, identified by 'profiles' (a description of a user of a network or the customer of an internet service provider), to interact and share information.
Splash page	A page of a website that acts as a front page before displaying the home page.
Unique user	An internet protocol (IP) address plus a further identifier. Sites may use as a further identifier a user agent, cookie and/or registration ID. (International Federation of Audit Bureaux of Circulations (IFABC) Global Web Standards)
User-generated content	Online content created by website users rather than media owners or publishers through reviews, blogging, podcasting or posting comments, pictures or video clips. Sites that encourage user-generated content include YouTube, Wikipedia and Flickr. (IAB, UK)
Viewership	The average number of TV viewers across a defined time of the day ('daypart') for a given month and channel.
Viral marketing	A marketing phenomenon that facilitates and encourages people to pass along a marketing message. Nicknamed viral because the number of people exposed to a message mimics the process of passing a virus or disease from one person to another. (American Marketing Association)

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Throughout this report alcoholic beverage brand names have been substituted with a category code, and brand names in images have been masked. This reflects the aims of the study, which are not to report on the activity of individual brands or companies, but rather to understand youth exposure to alcohol marketing across all brands. Companies are only specified in the context of an analysis of company codes on responsible alcohol advertising.

This report was produced under the Health Programme (2008–13) in the frame of a contract with the EAHC acting on behalf of the European Commission. The content of this report represents the views of the authors of this report only and is their sole responsibility; it can in no way be taken to reflect the views of the European Commission and/or the EAHC or any other body of the European Union. The European Commission and/or the EAHC do not guarantee the accuracy of the data included in this report, nor do they accept responsibility for any use made by third parties thereof.

1.1 **Background**

Alcohol use among young people, and adolescents in particular, is an increasing concern in Europe. In 2011, at least two-thirds of those aged 15–16 years in 35 European countries reported to having consumed alcohol at least once during their lifetime, and almost half reported that they had been intoxicated at least once during their lifetime.¹

Children and adolescents have greater vulnerability to alcohol than adults and there is increasing evidence of the impact of drinking on young people's health, both short and long term, including the increased likelihood of being in a risky situation when drunk. Other impacts include school performance; for example, a 2001 survey of European youth aged 11–15 found a strong relationship between alcohol consumption and school performance, concluding that alcohol can be both a result and a cause of school failure.² There are also implications for crime and anti-social behaviour.

There are many factors that may encourage alcohol use among young people, and alcohol advertising has been identified as one potential determinant. There is increasing evidence that youth exposure to alcohol marketing is a risk factor for under-age drinking. The Science Group established under the European Alcohol and Health Forum, a multi-stakeholder platform where members make commitments aimed at reducing alcohol-related harm, in 2009 issued a scientific opinion on the impact of marketing communication on the volume and patterns of the consumption of alcoholic beverages especially by young people. Based on a review of longitudinal studies the Science Group concluded that alcohol marketing increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol.³⁻⁴

The EU Alcohol Strategy, launched in 2006, has made protecting children and young people a priority by curbing under-age drinking and reducing hazardous and harmful drinking. One of the examples of effective measures highlighted in the strategy for Member States to consider is that of enforcing restrictions on sales, availability and marketing of alcoholic beverages likely to influence young people.

It was against this background that the European Alcohol and Health Forum set up a task force on marketing communication. This task force set out to produce a report to map measures taken by Member States, advertisers and the media to ensure that under-age youth are not targeted by alcohol advertising.⁵ The report noted that while European countries employ a range of statutory and regulatory measures to aim to achieve this, there remains the challenge to better understand the extent to which youth are exposed to

alcohol advertising in Europe. Indeed, it highlighted that the current focus of research around alcohol marketing and advertising and young people has remained on assessing its content rather than the level of exposure⁶ and there is a need to analyse programme-specific data on actual audiences, with special attention to be given to media most widely used by young audiences.⁵

1.2 **Media used in alcohol advertising**

A wide range of media contribute to alcohol advertising exposure. These include print media, both display advertising and classified adverts, outdoor advertising, audiovisual media such as radio, television and cinemas, as well as online media. In this report we focus on the two highest-spending advertising markets: television advertising and online advertising.

Television advertising

Television advertising began in the United States (US), where the first television advertisement was broadcast on 1 July 1941, advertising the watchmaker Bulova.⁷ The first television advert broadcast in the UK was on ITV on 21 September 1955, advertising Gibbs SR toothpaste. In 2010, it was reported that 94 per cent of Europeans watch television in a typical week⁸ and in recent decades television has dominated the advertising market.

In the European Union, the need to protect children and youth (minors) from alcohol marketing was already recognised in the 1980s and reflected in the Television without Frontiers Directive of 1989. Currently, the Audiovisual Media Services Directive (AVMSD) sets quantitative and qualitative protection measures for children with regard to marketing of alcoholic beverages. The AVMSD stipulates that 'audiovisual commercial communications for alcoholic beverages shall not be aimed specifically at minors and shall not encourage immoderate consumption of such beverages' (Article 9) and that alcohol advertising 'may not be aimed specifically at minors or, in particular, depict minors consuming these beverages' (Article 22). Article 22 also makes a number of other stipulations regarding the content of alcohol advertising. The total quantity of advertising and teleshopping is limited to 12 minutes per hour (Article 23) and children's programmes may be interrupted by television advertising and/or teleshopping only once for each scheduled period of at least 30 minutes (Article 20).⁹

The legally binding restrictions on television advertising from the AVMSD must be transposed into the national regulatory framework of all EU Member States.⁹ In addition to these EU level regulations, EU Member States can implement further regulatory and self-regulatory measures to restrict young people's exposure to alcohol advertising and countries employ a range of provisions to achieve this aim.

Online advertising

Use of the internet has become a common feature of everyday life. A study in 2010 indicated that Europeans spend the equivalent of one day a month online, with particular high levels of use in the Netherlands and UK.¹⁰ It found that up to 30 per cent of internet users to be under the age of 25 years and time spent online tends to be highest in this group, at around 30 hours per month. Social networking sites have become increasingly

popular worldwide but particularly so in Europe where, by the end of 2010, monthly penetration reached 84.4 per cent of all European internet users, with Facebook being the third most popular site in Europe. Use of social networking sites is particularly common among young people, with those aged 15–24 years representing 25 per cent of users, followed by just over 24 per cent among those aged 25–34 years.

The internet provides a considerable market for advertising. In the UK, online advertising now constitutes the largest share of total advertising spend, at 28 per cent of a total of just under £17 billion in 2011, followed by television (25 per cent) and print press (23 per cent).¹¹ This compares with an average of 18 per cent online advertising spend elsewhere in Europe (2010), ranging from 15.6 per cent in France to 28 per cent in Denmark.¹²

Online advertising can occur in the form of display advertising (see Figure 1.1), typically containing graphics or other art work placed adjacent to editorial content; classified adverts, in which advertisements are generally grouped under headings classifying the product or service being offered and provided by dedicated websites (eg www.classifiedads.com); or paid (or sponsored) search, in which advertisers pay for their products or services to be displayed alongside search results on terms that are relevant to their business.¹³



Figure 1.1: Example of a web page showing display advertising.

The use of social media sites for advertising has grown considerably in recent years. According to comScore (2011), during 2010, the total number of digital display advert impressions on social networking sites (an impression occurs when a person sees or hears an advertisement) in the UK and Germany grew by 47 per cent and 102 per cent, respectively.¹⁰ By December 2010 social networking publishers accounted for the largest share of display adverts in the UK and Germany.¹⁰ Although advertisers have in the past avoided advertising on social networks because of low click-through rates, there is increasing recognition that this is not an appropriate way of measuring brand impact

online, and that online adverts can succeed in driving sales impact independently of click-through rates.¹⁴

1.3 **Assessing exposure to alcohol advertising**

Television advertising

At present, exposure to alcohol advertising in audiovisual media is most frequently measured through self-reported exposure based on surveys, with a smaller number of studies combining self-reports with other measures such as per-capita expenditure on alcohol advertising,¹⁵ volume of advertising exposure by (television) programme,¹⁶ or an index of watched shows weighted for alcohol advertising frequency. A small number of studies has made more systematic use of audience or viewer data, using (targeted) per-capita advertising exposure¹⁷ or raw data on viewership and advertisement volume to measure exposure.¹⁸ Using these types of measures provides a different approach to exposure assessment, so complementing insights obtained from self-reports as assessed through surveys. Much of the research that has aimed to assess alcohol advertising exposure using audience and advertising data has been undertaken in the US and, more recently, Australia,¹⁵⁻¹⁸ with little work undertaken in Europe so far.

Online advertising

The nature of the internet, with the multiplicity of websites available and the challenge of tracking the frequently varying content and viewership of these sites, makes it difficult to assess the scale of youth exposure to alcohol advertising through this medium. The leading providers have instituted policies on alcohol advertising; for example, Facebook stipulated that alcohol advertisements are to be targeted at specified age groups only, typically age 18 or older in most European countries, or 25 years and older in Sweden.¹⁹ Furthermore, alcohol advertisements, when placed, have to meet a number of requirements, for example, they must not include content that is 'intended to appeal to anyone younger than the permissible targeted age group or is otherwise associated with youth culture'.¹⁹ Google's advertising specifications prohibit the promotion of the sale of 'hard alcohol and liquor' including showing the branding of this type of product while allowing the promotion of the sale of beer, wine and champagne.²⁰ However, Google allows for exemptions from the general principle in selected regions, mostly European countries, provided the advertisement and website meet a number of criteria, including not targeting minors (age not defined), not using 'endorsements from athletes, cartoon characters, or any other icons/people appealing to minors', using an age verification system ('age gate'), which requires users to confirm their age before entering the website, and so on.²⁰ Yahoo requires advertisements for alcoholic beverages to be appropriately age targeted and they may only appear in certain 'Yahoo properties'. As part of Yahoo's policies, alcohol advertisements will undergo additional policy review and approval.²¹

While there is a commitment by certain providers to protect young people from exposure to alcohol marketing online, where alcohol advertisement is not explicitly prohibited, such as on the social networking site Bebo,²² the extent to which these policies are effective is not well understood.²³ Importantly, even where there are (potentially restrictive) policies in place, exposure to marketing can still be widespread, through a variety of website features, such as the creation of fan pages and user groups. For example, Mart et al. (2009)

identified over 50,000 Facebook groups that were linked to alcohol.²⁴ This is in addition to exposure to direct marketing from alcohol companies. Thus, work undertaken in the US found that for 55 websites operated by alcohol companies around 13 per cent of in-depth visits (defined as visits that involved more than two page views) were initiated by under-age persons.²⁵ That work also demonstrated that even where age verification mechanisms are in operation – requiring age identification – interactive facilities such as downloadable screensavers or wallpapers were easily available for minors.

In contrast to assessments of exposure to alcohol advertisement in audiovisual (and print) media, similar research for online media is only emerging²⁵ and there is a need to better understand the routes through and extent to which young people are exposed to online alcohol marketing.

The research presented in this report aims to contribute to closing this gap by developing further approaches to assess alcohol advertisement exposure among young people in Europe through audiovisual and online media so as to inform the development of effective regulatory or self-regulatory policies to protect young people. Findings will also inform approaches for monitoring changes over time and enable comparative work, between and within populations.

1.4 **About this report**

The European Commission's Executive Agency for Health and Consumers (EAHC) commissioned RAND Europe to carry out an assessment of young people's exposure to alcohol marketing through television and online media. The objectives of this work were:

1. to examine young people's exposure to alcohol marketing in television through
 - examining exposure to alcohol adverts on television by analysing advert programming and audiences by age
 - describing alcohol advertising portrayals in some of the television programming in which alcohol adverts are embedded
 - assessing adherence of alcohol adverts to national statutory or voluntary codes on (alcohol) advertising in each country, and policies developed by alcohol manufacturers
2. to examine young people's exposure to alcohol marketing in online media through
 - examining data on the top online media channels accessed by young people
 - describing the main types of social media marketing messages for alcoholic beverages, distinguishing marketer-generated and user-generated content
 - estimating online exposure to alcohol marketing of young people specifically.

The report is structured as follows. This introductory chapter sets the background to the work undertaken and the specific aims and objectives it seeks to achieve. Chapter 2 reports on our assessment of youth exposure to alcohol advertising on television in three countries:

Germany, the Netherlands and the UK. It sets out the methodological approach, describes the key observations emerging from the analyses and closes with an overall discussion of the findings. Chapter 3 focuses on the assessment of youth exposure to alcohol advertising through online media, here using the UK as a case study. Again, we first set out the methodological approach, followed by a description of the main findings from the analyses undertaken, and close with a discussion of the main observations. Chapter 4 concludes the report by bringing the observations from the different sets of analyses together and embedding them in the wider context of existing evidence. It closes with a set of recommendations for further research.

The main body of the report is accompanied by a series of appendices that provide further background to analyses undertaken and additional material on statutory and self-regulatory frameworks for alcohol advertising in the countries under review.

CHAPTER 2 **Assessing youth exposure to alcohol advertising on television**

This chapter reports on the analysis of youth exposure to alcohol advertising on television in three countries, describing three sets of analyses that sought to:

- quantify the relative level of youth exposure to alcohol advertising
- analyse the content of alcohol advertising portrayals in television
- provide further insights into exposure to alcohol marketing during televised football matches in the UK.

We first describe the methodological approach used and then present the findings for each of the three sets of analyses. We close with a discussion of the findings of each analysis.

2.1 **Data and methods**

2.1.1 **Quantifying exposure to alcohol advertising on television**

The principal data required to measure exposure to alcohol adverts on television are audience data, for example, the number of viewers of a given programme type or channel and their demographics, and data on advertising occurrence.

The data structure is illustrated in Figure 2.1, which provides the basis for carrying out assessment of youth exposure to alcohol advertising. A main challenge for the research presented here is obtaining robust and systematically collected data.

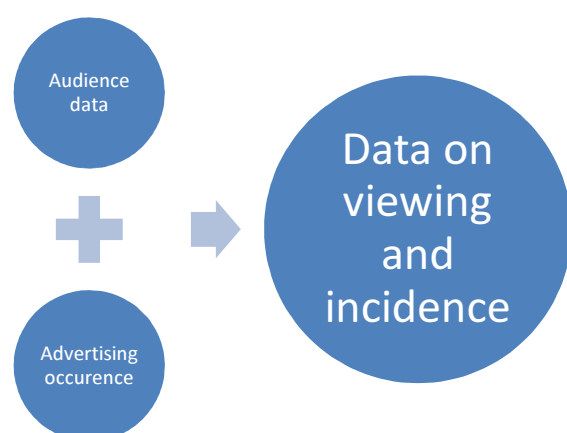


Figure 2.1: Data requirements

Television audience and advertising data

We based the measurement of exposure to alcohol advertisement in television on work undertaken mostly in the US, which has used audience or viewership data as described in Section 1.3. The principal source of data used elsewhere is Nielsen Media Research, which is considered the standard source for television audience data.²⁶ The challenge for the European setting is to identify data that are of sufficiently high quality to enable exploration, testing and further development of methodological approaches that have been developed for this medium. From high-quality data it should be possible to assess both the overall exposure of youth to alcohol advertising and whether ad placements appear sensitive to youth viewership after controlling for young adult and older adult viewership. However, commercial data on viewership and advert placements are very expensive, therefore requiring an approach to data acquisition that is highly selective with regard to level of detail and coverage, while meeting the essential criteria that allow for analyses to quantify youth exposure to alcohol advertising.

Following discussions with DG SANCO we specified requirements as follows:

- **At-risk youth population:** Work carried out in the US typically considers ages 12–20 as the most relevant in public health terms.²⁶ We sought to distinguish those aged 13–17 from those aged 18–24, with the age cut-off point between 17 and 18, coinciding with the minimum age for selling and serving alcohol, which is 18 years in most EU Member States.²⁷
- **Time period:** Ideally the data would cover a 12-month period to capture seasonality (eg sports events such as Champions League, public holidays, etc),¹⁷ but obtaining 12 months of data is costly; a shorter time frame of 6 months for exposure assessment was used for this study, with the aim of capturing some seasonal viewership change.
- **Countries:** Because of the costs associated with data on viewership and advertising we could only consider a limited number of countries for analysis. We selected three countries that present a policy mix with regard to alcohol advertising in different settings.²⁸

- UK: ban on all advertising on public service television channels; self-regulatory threshold of a minimum of 75 per cent adult audience for alcohol advert placement on non-broadcast media²⁹
- Germany: no legal ban on alcohol advertising on television; voluntary agreement that most spirits are not advertised on television
- Netherlands: voluntary ban on alcohol advertising through any media where 25 per cent of the audience is under the age of 18 years; statutory ban on alcohol marketing on Dutch television and radio between 06.00 and 21.00 hours.

Our analysis aimed to explicitly consider variation in audience viewership and advertising across different time slots. We obtained quotes from two data providers – Eurodata TV Worldwide/Nielsen Media Research and Ebiquity – for data that, in addition to the above, met the following criteria:

- (i) provide viewership numbers by timeslot and channel, for the top most viewed ten channels and disaggregated by age (ideally: <12, 13–17, 18–24, 25+)
- (ii) provide a full schedule of alcohol advertisements, by beverage type, of television channels described in (i).

We acquired data from the company Ebiquity, which monitors marketing across all media in 15 European countries. This includes viewership and advertising data for television and online media, drawing on the resources of their network of local offices and partnerships across Europe, using ‘peplemeter’ technology to source and present the requested data (see below). Ebiquity provided, for each country:

- viewership figures: the average number of viewers for each demographic group in the time period and channel under consideration
- advert impact figures: a measure of the number of people viewing a given advert: one impact equates to one member of the target audience viewing one advertisement; two persons viewing one advert each or one person viewing the same advert twice each equates to two impacts
- the number of alcohol advertisements by brand and product
- estimated advertising spend (UK and Germany).

Data were disaggregated by age, as well as channel, month and timeslot, defined as ‘dayparts’ by time period during the day on a given day (weekday, weekend). Data obtained covered a 6-month time period from December 2010 to May 2011, and the top ten most viewed channels in each country. Data for the UK excluded the public service channel BBC, which does not broadcast any advertising.

Data provided by Ebiquity followed the television advertising industry standard age ranges that are used by advertisers for their own marketing decisions, which differed by country. This did not allow for distinguishing age 18 years as a cut-off between ‘youth’ and ‘adult’ in any of the three countries. Customising the data to meet the preferred age ranges outlined above was not possible within the budget available for this work. An alternative would have been to use a time period shorter than 6 months to accommodate

customisation of data by age, but this would have limited our ability to capture seasonality in viewership and advertising patterns. Importantly, by using those demographics that are also used by advertisers we feel confident for the data format used in our analysis to be appropriate. Age groupings by country are shown in Table 2.1.

Table 2.1: Viewership age groups (in years) in the UK, Germany and the Netherlands

UK	Germany	Netherlands
4–9	4–9	6–12
10–15	10–15	13–19
16–24	16–24	20+
25+	25+	

SOURCE: Ebiquity

Daypart definitions also varied by country, as shown in Table 2.2.

Table 2.2: Television timeslots ('dayparts') in the UK, Germany and the Netherlands

	UK		Germany		Netherlands
	Weekday	Weekend	Weekday	Weekend	
Breakfast	06.00–09.29	06.00–09.29	06.00–09.29	06.00–09.29	02.00–12.00
Coffee time	09.30–11.59		09.30–11.59		12.00–18.00
Daytime	12.00–15.59		12.00–15.59		18.00–20.00
Pre-peak	16.00–17.24	09.30–17.24	16.00–17.29	09.30–17.29	20.00–22.30
Early peak	17.25–19.59	17.25–19.59	17.30–19.59	17.30–19.59	22.30–02.00
Late peak	20.00–22.59	20.00–22.59	20.00–22.59	20.00–22.59	
Post-peak	23.00–00.29	23.00–00.29	23.00–00.29	23.00–00.29	
Night time	00.30–05.59	00.30–05.59	00.30–05.59	00.30–05.59	

SOURCE: Ebiquity

Data source

The viewership and advertising data provided by Ebiquity stem from different sources, with those for Germany and the Netherlands originating from the GfK Group, a large market research company with headquarters based in Germany.³⁰ For the UK, Ebiquity uses data obtained from the Broadcasters' Audience Research Board (BARB).³¹

Both GfK and BARB monitor viewership using a representative panel of households and employing the 'peplemeter' measurement technology. For example, BARB uses a multi-stage, stratified and un-clustered sample design to obtain a home panel that is representative of all television households across the UK. Households cannot apply to participate in the panel, and participating households do not receive compensation for their participation. The size of the panel is 5,100 households in Germany,³² 5,100 households in the UK³³ and 2,400 people (rather than households) in the Netherlands.³⁴

The peplemeter technology involves a meter that is connected to each television set in each home that is part of the panel. The meter automatically records information about the channel that is being viewed, and household members register their presence when in a room with a television set switched on, using the peplemeter handset. The metering

system monitors all registrations made by each individual for each television in the home. Viewership is reported per minute.³³ Data collected this way have to rely on household participants to register their presence in a room with a running television set using the peoplemeter handset. While there is potential for bias because people fail to register their presence, or they may register but are in fact not watching television, this method of data collection is recognised as the media industry standard and considered as the most appropriate approach to obtain viewership information.³⁵

Analytical approach

The key objective of the analysis was to quantify relative levels of exposure to alcohol advertising for youths. We built on an analytical approach employed by Chung et al. (2010) in the US, which examined whether ad incidence (the count of alcohol advertisements per time slot duration per average number of viewers) is associated with youth viewership.¹⁸

We began by providing descriptive analyses to understand and characterise youth viewership and alcohol advertising patterns. In a second stage, we analysed advertising incidence ('ad incidence' – advertisements per viewer hour) to understand incidental youth exposure to alcohol advertising relative to adults.

Descriptive analysis

We analysed viewership patterns by age, across months, dayparts and television channel for each of the three countries. We then examined, again for each country, alcohol advertising patterns by beverage type, across months, dayparts and television channel. In line with product categories defined in the data received, we aggregated alcohol products into beer, cider, spirits, wine and ready-mixed drinks. In the UK, alcohol advertising also included supermarket branded alcoholic drinks ranges. Where these were not specified further (eg identified as beer and lager), we aggregated them into a separate 'combination' group.

In a further step, we defined a measure to assess alcohol advert intensity, which measures the viewer exposure to alcohol adverts by age across channel, month and daypart. This measure was derived as:

$$\text{alcohol advert intensity} = \frac{\text{total alcohol impacts}}{\text{total viewership}}$$

where

impacts is the total number of times each advert was viewed

viewership is the average number of viewers across a defined time of the day ('daypart') for a given month and channel.

Following Chung et al. (2010),¹⁸ we excluded the daypart-channel combinations in which it is not possible to place an alcohol advert because of statutory requirements (eg advertising ban in the Netherlands enforced from 06.00 to 21.00) from our analysis. Dayparts in which a channel is not broadcast were also excluded, for example, channels which are only broadcast at specific times of day. As indicated above, the UK analyses did

not include the two public service channels of the BBC, as no advertising is shown on them.

To understand the pattern of alcohol advert intensity across channels, months and dayparts, and the way in which it relates to youth viewership, we generated scatterplots of alcohol advert intensity against the proportion of the viewership in each age group. We considered each channel, month and daypart combination as an individual data point, and for each data point plotted alcohol advert intensity against proportional viewership.

Quantifying the relative level of youth exposure to alcohol advertising

We carried out regression analysis to assess whether younger people in the audience are more likely to be exposed to alcohol advertising than adults. Because of the nature of the data used in the analysis, we were unable to define 'adult' in line with the minimum age for selling or serving alcohol, which is 16 years for beer and wine and 18 years for spirits in Germany and the Netherlands, and 18 years for all alcoholic beverages in the UK.³⁶ We therefore used different comparators. In Germany and the UK we tested two 'adult' definitions: ages 25 years and older (25+) and 16 years and older (16+), with the latter to be seen as an approximation to the legal minimum age for selling or serving alcohol in most European countries. This distinction was not possible for the Dutch data; here we used age 20 and older (20+) as the 'adult' comparator throughout.

We used a negative binomial regression model, following the approach used by Chung et al. (2010),¹⁸ where the number of alcohol adverts formed the dependent variable. The proportion of the viewership by age group formed the independent variables. The model used is further explained in Box 2.1.

Dayparts differed both in duration (hours) and size of audience (viewership); we therefore created an exposure variable equal to the length of the daypart in hours (total hours in the given month) multiplied by the corresponding average viewership. We thus modelled the incidence of advertisements per viewer hour (hereafter referred to as 'ad incidence'). Only dayparts that included some alcohol advertising were included in our analysis.

Results are presented as incidence rate ratios (IRRs). This measure is the amount by which alcohol advert intensity is multiplied for a given age category, relative to a reference category. These were computed separately for each of several alcohol beverage types within each country. An IRR greater than 1.0 indicates higher exposure for the age category in question than for the reference age category; an IRR of 1.0 indicates exposure equal to that in the reference category; and an IRR less than 1.0 indicates less exposure than in the reference age category. As noted above, we used different reference groups, depending on the age grouping available by country (Germany and UK: ages 16+ or 25+; the Netherlands: age 20+). We combined beer and cider into a single product category given the similar price level of these products.

For each product category we conducted a joint test of significance for the estimated parameters. The null hypothesis in this test is that all the independent variables are zero, against the alternative hypothesis that at least one of them is different from zero. In simpler terms, we tested if some of these independent variables matter in explaining the variation in the dependent variable.

Box 2.1: Negative binomial regression model used in the analysis

Negative binomial regression is typically used for over-dispersed count data – when the conditional variance exceeds the conditional mean. In this regression it is assumed that the dependent variable Y has a negative binomial distribution given the independent variables X_1, X_2, \dots, X_m . The log of the mean of the dependent variable, μ , is a linear function of these independent variables (Equation 1),

$$\log(\mu) = \text{intercept} + b_1 * X_1 + b_2 * X_2 + \dots + b_m * X_m \quad \text{Equation 1}$$

The variance of negative binomial distribution is $\mu + \alpha\mu^2$, where $\alpha \geq 0$ is a dispersion parameter. The parameters of Equation 1: b_1, b_2, \dots, b_m along with the (over)dispersion parameter α are estimated using the maximum likelihood method.

The parameters in Equation 1 can be interpreted as follows. For each one-unit change on X_1 , keeping other variables fixed, the expected log count of the dependent variable changes by b_1 .

Further, Equation (1) can be transformed as (assuming $m = 2$ for simplicity):

$$\begin{aligned} \mu &= \exp(\text{intercept} + b_1 * X_1 + b_2 * X_2) \\ \mu &= \exp(\text{intercept}) * \exp(b_1 * X_1) * \exp(b_2 * X_2) \end{aligned} \quad \text{Equation 2}$$

The multipliers $\exp(b_1), \exp(b_2)$ in Equation 2 are referred to as incidence-rate ratios (IRRs). The percentage change in the incident rate of the dependent variable is equal to (1 IRR) for every unit change in X .

For example, in this study for analyses for the UK and Germany, Equation 2 is written as:

$$\mu = \exp(\text{intercept}) * \exp(b_1 * P_{4-9}) * \exp(b_2 * P_{10-15}) * \exp(b_3 * P_{16-24})$$

where μ = mean of number of commercials,

P_{4-9} = viewership proportion for age group 4 to 9 years

P_{10-15} = viewership proportion for age group 10 to 15 years

P_{16-24} = viewership proportion for age group 16 to 24 years

We have not included the term for age group 25+, which reflects the reference group. Thus the incidence rate for age group 4–9 years will be $\exp(b_1)$ times the incidence rate for the reference group. Similarly the incidence rates for the other two age groups will be b_2 and b_3 times that for the reference group.

2.1.2 Content analysis of alcohol advertising portrayals on television

In order to place alcohol advertising into context, we analysed alcohol advertising portrayals in advertisements by means of content analysis. This analysis was principally based on identifying those elements that have been shown to be appealing to children and youth. For example, Waiters et al. (2001), in a focus group study with students aged 9–15 in the US, found animal characters, music and humour to be the most attractive elements of adverts across all groups.³⁷ Liking of such elements, in particular storyline and use of humour, was further shown to contribute to overall likeability of a given advert.³⁸ Atkin and Block (1983) demonstrated how the use of celebrity endorsers on alcohol advertising was highly effective with teenagers,³⁹ while a more recent focus group study in the UK confirmed the observations by Waiters et al. (2001), finding humour and music, alongside

originality, quirkiness, fantasy settings, the unexpected and people having fun or behaving in a childish fashion, to be liked by young people.⁴⁰ Similar observations were made in an Australian setting, where participants in a research study identified humour, music and storyline appealing to youth, as well as use of cartoon and animal characters, animation and special technological effects.⁴¹

Existing research indicates that liking of a given alcohol advert among young contributes to purchase intent of that product among young people,³⁸ with other work also pointing to an association between liking of an advertisement and consumption.⁴² We therefore sought, in this study, to analyse systematically the content of a selection of television alcohol adverts in the three countries under study. The approach used involved:

- the development of a coding frame to analyse alcohol advertising portrayals in alcohol adverts
- selection and recording of television footage for analyses
- the analysis of alcohol advertising portrayals.

As part of this analysis, we conducted an additional case study that focused on alcohol advertising during televised football matches. Below, we describe each of these steps in turn.

Development of a coding frame for analysing alcohol advertising portrayals

Building on the evidence briefly summarised in the preceding section, we identified a long-list of features that the literature had identified as appealing and unappealing to young people (Table 2.3).

Table 2.3 Long-list of features of adverts identified in the literature as appealing and unappealing to young people

Features of adverts appealing to young people	Features of adverts unappealing to young people
Humour	Product-focused aspects
Music	Poor technical presentation
Storyline (especially a simple, uncomplicated storyline)	Negative presentation of women
Cartoons or animation	Exploitation or misrepresentation
People characters	
Animal characters	
Special technological effects	
People having fun or behaving in a childish fashion	
Fantasy settings	
Originality	
The unexpected	
Quirkiness	
Celebrities	

SOURCE: Adapted from ^{37-38 40-41}

We developed the features shown in Table 2.3 into a short-list, excluding those which we anticipated would be difficult to define consistently across different observers. To test consistency of ratings, we piloted a preliminary list of features among three members of the

research team, whom we asked to view and describe the same random sample of five adverts recorded from UK television separately. We gave them a list of features considered appealing to youth and invited them to judge whether they were present or absent, and to record:

- the length of the advert
- the length of time until the topic of the advert – the alcoholic beverage – became obvious
- the type of beverage,
- the drink brand
- details on the programme shown before and after the advert.

We also asked observers to provide a brief description of the content of the advert. The observers were researchers from different cultural backgrounds, each at least partially related to the country where the TV footage originated.

We then compared individual assessments of each observer, and discussed, clarified and, where appropriate, reconciled differences between observers regarding advertisement assessments with a fourth researcher who acted as moderator. Where consensus was not achieved about a feature, we dropped it from the list. The final short-list of features analysed is shown in Table 2.4 and the related coding frame is reproduced in Appendix A. We did not test coder reliability using the final coding frame.

Table 2.4 Short-list of features of adverts used for the analysis of alcohol advertising portrayals

Features of adverts appealing to young people	Features of adverts unappealing to young people	Other
Humour (eg slapstick, clownish, sarcasm, irony)	Product-focused aspects	Reference to Drinkaware ⁴⁹ or similar German or Dutch website providing information about alcohol
Music		Easily memorable catch phrase
Cartoons or animation (only animated characters, not special effects)		
People characters (who are central to the story)		
Animal characters (who are central to the story)		
Special technological effects		
People behaving in a childish fashion		
Fantasy settings (which do not occur in real life, eg in the past or in space)		
Celebrities		

Selection and recoding of television footage

We recorded television footage in the UK, Germany and the Netherlands, using electronic recording devices that are directly attached to a television set (Germany, Netherlands) or allow watching and recording of live television on a computer (UK). We selected the three dayparts with the highest number of alcohol adverts viewed by children (aged 4–15) in each country (Table 2.5), based on the quantitative analysis described in section 2.1.1. We

scheduled recordings for each daypart on Fridays and Saturdays, the days which for the Netherlands and Germany showed the highest alcohol advert impacts (data on impacts by day of the week were not available for the UK). Therefore the adverts recorded were those broadcast at the times when the maximum impact for advertisements could be expected among young people.

Table 2.5: Dayparts selected for recording of television footage for advert analysis

UK		Germany		Netherlands	
Daypart	Channel	Daypart	Channel	Daypart	Channel
17.25–19.59	ITV1	17.30–19.59	Pro7	20.00–22.30	RTL4
20.00–22.59	ITV1	20.00–22.59	Pro7	20.00–22.30	SBS6
20.00–22.59	Channel 4	20.00–22.59	RTL	20.00–22.30 (weekend)	RTL4

We recorded each daypart twice, at a 2-week interval, during February and March 2012, resulting in a total of 15–17 hours of footage for each country. Within the timeframe of this work it was not possible to collect a representative sample of adverts across a larger number of channels and a longer period (ideally 6 months as a minimum). For this reason, analyses presented here should be interpreted as exploratory rather than confirmatory.

Analysis of alcohol advertising portrayals on television

The research team involved in the pilot analysed the recorded television footage, with one observer assigned to each country. Because we recorded footage in the original language of each country, it was not possible to cross-assign team members to different countries. However, as the three team members were also involved in the piloting of the coding instrument we feel confident that approaches to analyses were reasonably consistent across researchers.

We analysed all alcohol advertisements broadcast within the recording periods for each country, using the coding frame for characterising alcohol advertising portrayals described earlier. We had also recorded alcohol sponsorship of programmes but did not include it in the systematic analysis of alcohol advertising portrayals, although we briefly describe them in the results.

Alcohol advertising policies and advert compliance

Based on the analysis of alcohol advertising portrayals, we subsequently examined the extent to which these complied with the (self-)regulatory code for alcohol advertising in place in each country. The main regulatory codes in each country used here were:

- UK: Code of Broadcast Advertising of the Broadcast Committee of Advertising Practice (BCAP)⁴⁴
- Germany: Code of Conduct on Commercial Communication for Alcoholic Beverages⁴⁵
- Netherlands: the Advertising Code for Alcoholic Beverages.⁴⁶

Appendix B provides an overview of the codes under consideration.

For each advert, we recorded whether the advert adhered or not to the code in question, or whether there was a query around the definition of the rule. We also assessed the extent to

which additional alcohol advertising codes were in place in each country, including those implemented by alcohol producers and television broadcasters.

2.1.3 **Case study: alcohol advertising during televised football matches**

In addition to analysing portrayals of alcohol advertising on television, we conducted a small case study to assess the level of alcohol advertising and alcohol brand marketing during football matches broadcast in the UK. The purpose of this additional analysis was to understand the volume of alcohol marketing during sports programming, which was shown to be high in alcohol advertising assessments elsewhere.¹⁷

We carried out the case study between 23 March and 10 April 2012, involving four volunteers who viewed a total of 11 football matches, of which nine took place in England, one in Italy and one in Spain.

We invited participants to watch the whole match and associated coverage, and to record each observed occurrence of advertising or brand placement in the form of:

- sponsorship on team kit
- pitchside advertising
- scoreboard advertising
- projection of adverts onto pitch
- verbal mentions of alcohol brands
- other.

Participants also recorded the number of alcohol adverts seen during advertisement breaks in the game or match coverage.

2.2 **Findings**

2.2.1 **Quantifying exposure to alcohol advertising on television**

This section describes the main findings of analyses that sought to quantify the relative level of youth exposure to alcohol advertising. We present findings separately for each of the three countries under review. We begin by providing an overview of viewing and alcohol advertising patterns and then present the findings of the regression analysis, assessing the extent to which young people are incidentally more or less exposed to alcohol advertising than adults.

2.2.2 **Quantifying exposure to alcohol advertising on television: the UK**

Patterns of viewership by age, across months, dayparts and channels

Figure 2.2 shows the total viewership of the top ten most viewed commercial channels in the UK by age from December 2010 to May 2011. Overall, during this period, those aged 4–9 represented 3 per cent of the total viewership, while children and adolescents aged 10–15 represented 4 per cent. Those aged 16–24 constituted 8 per cent of the total viewership, while the largest group of those aged 25 years and more accounted for 85 per cent. The proportion of television viewership among those aged 25+ as assessed here was higher than the share of this group in the general population (Figure 2.2), while the proportion of the television viewership at younger ages was lower.⁴⁷

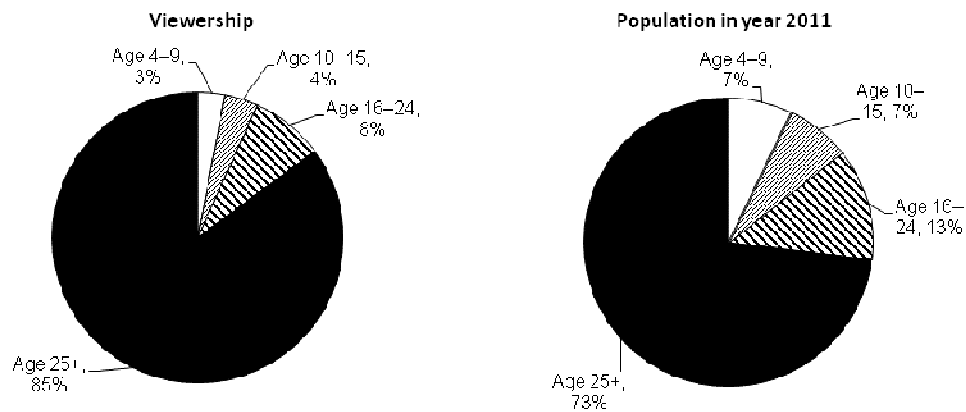


Figure 2.2: Comparison of the proportion of TV viewers to the UK population, by age

There was some fluctuation in total viewership across months; however, the proportion of each age group remained relatively stable (Figure 2.3).

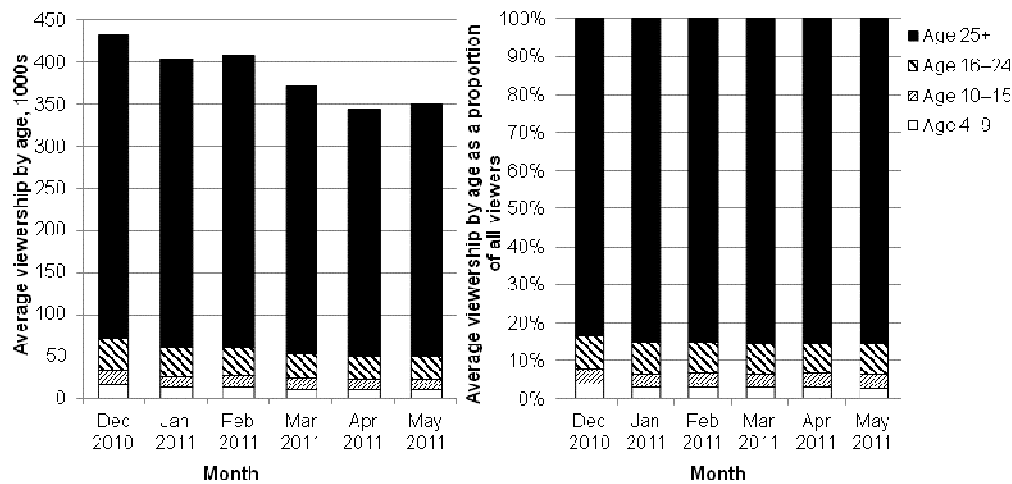


Figure 2.3: Absolute and relative viewership of the ten most viewed commercial channels, by age and across months, UK, December 2010 to May 2011

Viewership varied across the time of the day (here using ‘daypart’) (Figure 2.4). Thus, the highest average viewership was seen for the ‘late peak’ daypart, 20.00–22.59 hours, followed by the ‘early peak’ at 17.25–19.59 hours. The age distribution varied, with the highest proportion of viewers in the 4–9 age group during the breakfast daypart, and the largest proportion of viewers aged 16–24 during the ‘night time’ daypart (00.30–05.59 hours).

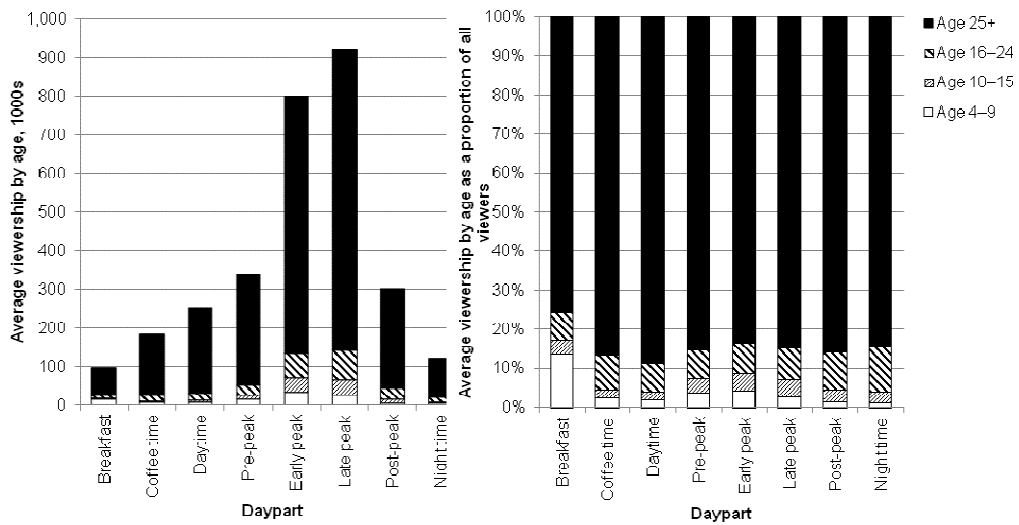


Figure 2.4: Absolute and relative viewership of the ten most viewed commercial channels, by age and daypart, UK, December 2010 to May 2011

Similarly, large variation was seen in viewership by channel (Figure 2.5). The highest viewership was recorded for ITV1, followed by Channel 4 and Channel 5. We should reiterate that the public service channels of the BBC were not included in the analysis, because they do not permit product advertisements. There was considerable variation in the age groups that view different channels, with the under-25s forming the highest proportion of viewers (over 40 per cent) of E4, followed by Dave and ITV2. In contrast, less than 5 per cent of the viewership of ITV3 was under 25.

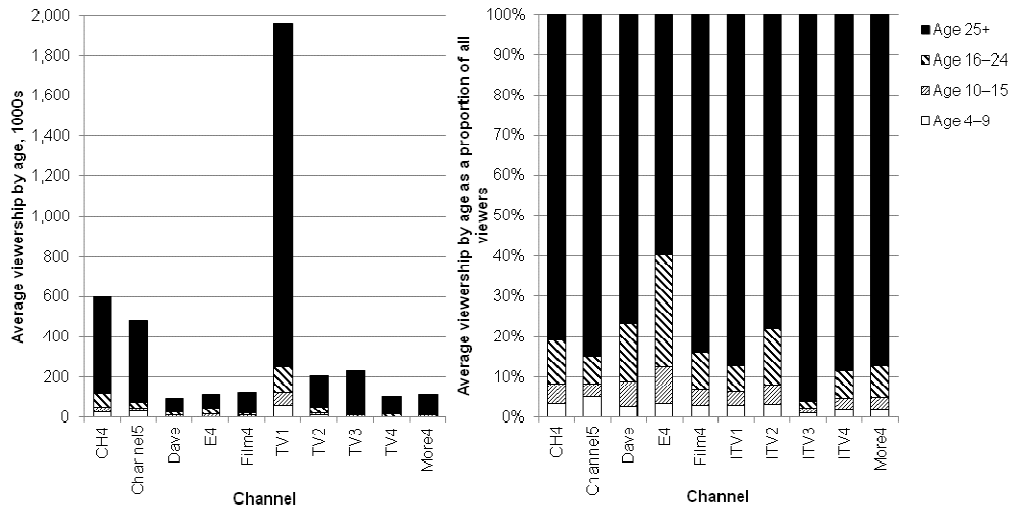


Figure 2.5: Absolute and relative viewership of the ten most viewed commercial channels, by age and television channel, UK, December 2010 to May 2011

Patterns of alcohol advertising across months, dayparts and channels

Between December 2010 and May 2011, a total of 44,483 alcohol adverts were broadcast on the top ten commercial channels in the UK. Figure 2.6 shows the distribution of these adverts, by beverage type. Beer and spirits formed the largest proportion of adverts, at 37

per cent and 32 per cent, respectively, followed by wine (12 per cent) and cider (9 per cent). Only 2 per cent of the alcohol adverts were adverts for ready-mixed drinks. About 8 per cent of advertisements related to supermarket branded alcoholic drinks ranges, here labelled as 'combination'.

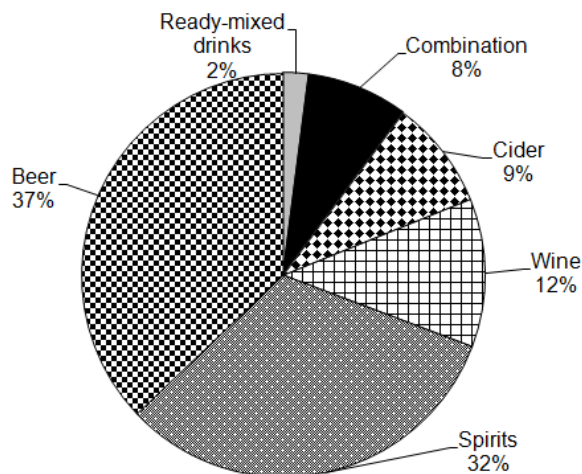


Figure 2.6: Distribution of alcohol advertising on the ten most viewed commercial channels in the UK by product category, December 2010 to May 2011

The highest number of alcohol adverts were broadcast in December 2010, at 37.3 per cent of the total number of alcohol adverts over the 6-month period, while the lowest number appeared in January 2011 (2.8 per cent), followed by a steady increase to May 2011 (Figure 2.7). The placement of advertisements for different alcoholic beverages also varied across the months. The highest proportion of advertising for spirits was seen in December, whereas the highest proportion of adverts for wine was in March. Beer and cider adverts were broadcast throughout the study period.

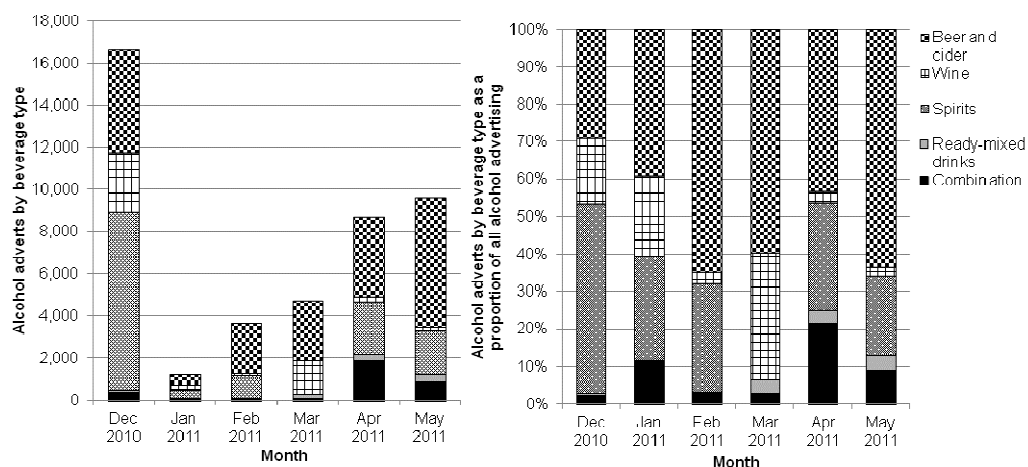


Figure 2.7: Absolute and relative number of alcohol adverts shown on the ten most viewed commercial channels, by beverage type and month, UK, December 2010 to May 2011

Alcohol advertising also varied by the time of the day, with the highest number broadcast in the ‘late peak’ (20.00–22.59 hours), and the lowest number during ‘breakfast’ (06.00–09.29 hours) (Figure 2.8). The proportion of alcohol adverts corresponding to each beverage type was similar across the dayparts.

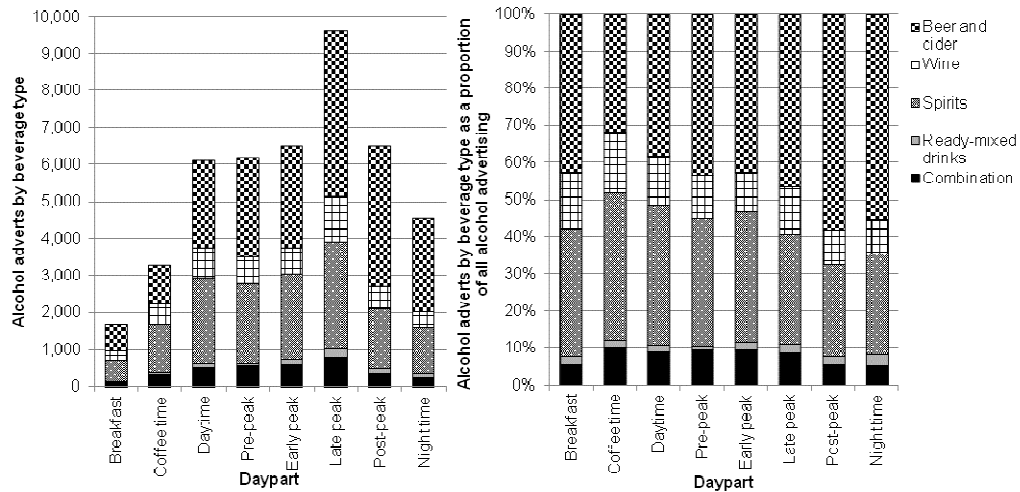


Figure 2.8: Absolute and relative number of alcohol adverts shown on the ten most viewed commercial channels, by beverage type and daypart, UK, December 2010 to May 2011

The frequency of alcohol advertising varied considerably across channels, with the highest number broadcast on ITV1, followed by Channel 4 (Figure 2.9). The proportion of adverts for various beverage types differed by channel. Beer and cider accounted for almost 60 per cent of alcohol adverts on Channel 4, but only about 30 per cent of alcohol adverts on ITV2.

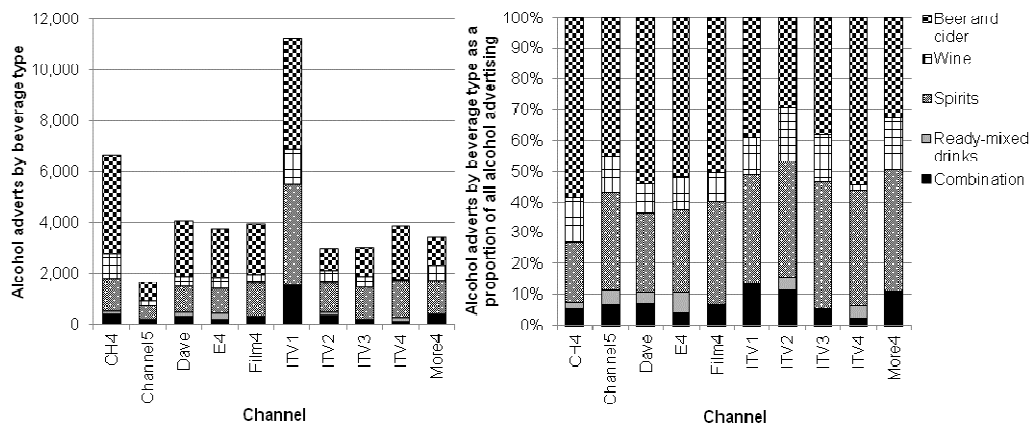


Figure 2.9: Absolute and relative number of alcohol adverts shown on the ten most viewed commercial channels, by beverage type and channel, UK, December 2010 to May 2011

Exposure to alcohol advertising by age group

In a next step, we brought viewership and alcohol advertising together to construct a measure of alcohol advert intensity, which defines exposure per viewer to alcohol adverts

by age across channel, month and daypart. We analysed these further using scatterplots, which set alcohol advert intensity against the viewership in a given age group. In Figure 2.10 to Figure 2.13 we have plotted the alcohol advert intensity against the proportion of the viewership made up by the age group under consideration.

Thus, Figure 2.10 plots alcohol advert intensity (y-axis) against proportional viewership for children aged 4–9 years (x-axis). Channels, months and dayparts are illustrated by different symbols (daypart), colours (channels) and size (month). This shows that alcohol advert intensity varied widely, with the highest advert intensity on ITV4 in December 2010. Children aged 4–9 formed a very small proportion of the viewership across most channels, months and dayparts. The viewership proportion of this group rarely exceeded 10 per cent. The only exception was Channel 5, which showed pockets of high proportional viewership at around 40 per cent during breakfast time. These dayparts on Channel 5 are dominated by children's programming (data not shown). There were several instances in which the proportion of viewers in this age group was higher than its proportion in the general population, at 7 per cent, as shown in Figure 2.2. This was the case, for example, in December 2010 for Channel 5 and Dave in the morning ('coffee time'; 09.30–11.59), where 10 per cent and 8 per cent of the viewership were in the 4–9 age group, respectively. Regressing advert intensity against the proportion of viewers aged 4–9 years points to a negative association for age group 4–9 years ($R = -0.73$).

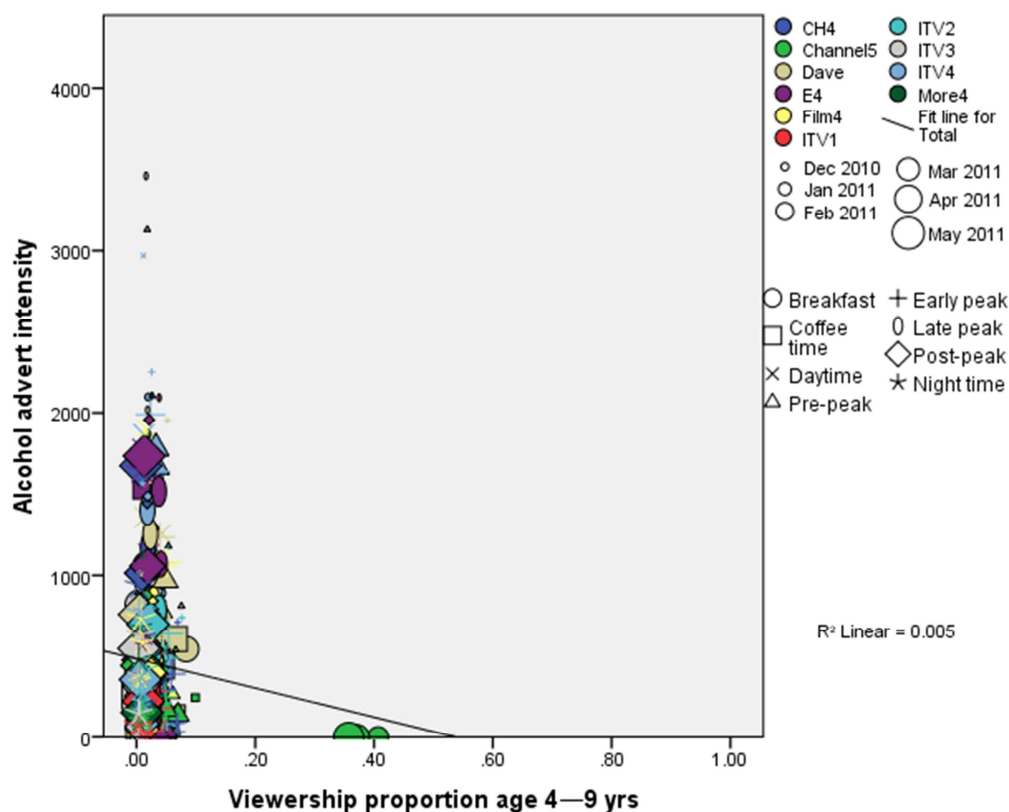


Figure 2.10: Scatterplot of advertising intensity by viewership proportion for children aged 4–9 years, UK, December 2010 to May 2011

Children and adolescents aged 10–15 years similarly accounted for a small proportion of total viewership across channels, which, among the ten channels studied, remains well below 20 per cent (Figure 2.11). However, again similar to the younger age group, there were instances where the proportion of those aged 10–15 was higher than their share in the general population (also 7 per cent). This was most frequently seen for Dave and E4. E4 is an entertainment channel aimed at young people, aired on British digital television. The schedule includes a mix of British shows such as *Shameless*, *Hollyoaks*, *Skins*, *The Inbetweeners* and *Misfits*, and US comedy shows. Dave is a channel owned by UKTV and available on satellite, cable, IPTV and Freeview platforms. As the channel tagline ‘the home of witty comedy banter’ implies, Dave broadcasts primarily entertainment, including comedy. Several of the E4 dayparts display high alcohol advert intensity. The regression points to a positive association between advert intensity and viewership proportion for age group 10–15 years ($R=0.14$).

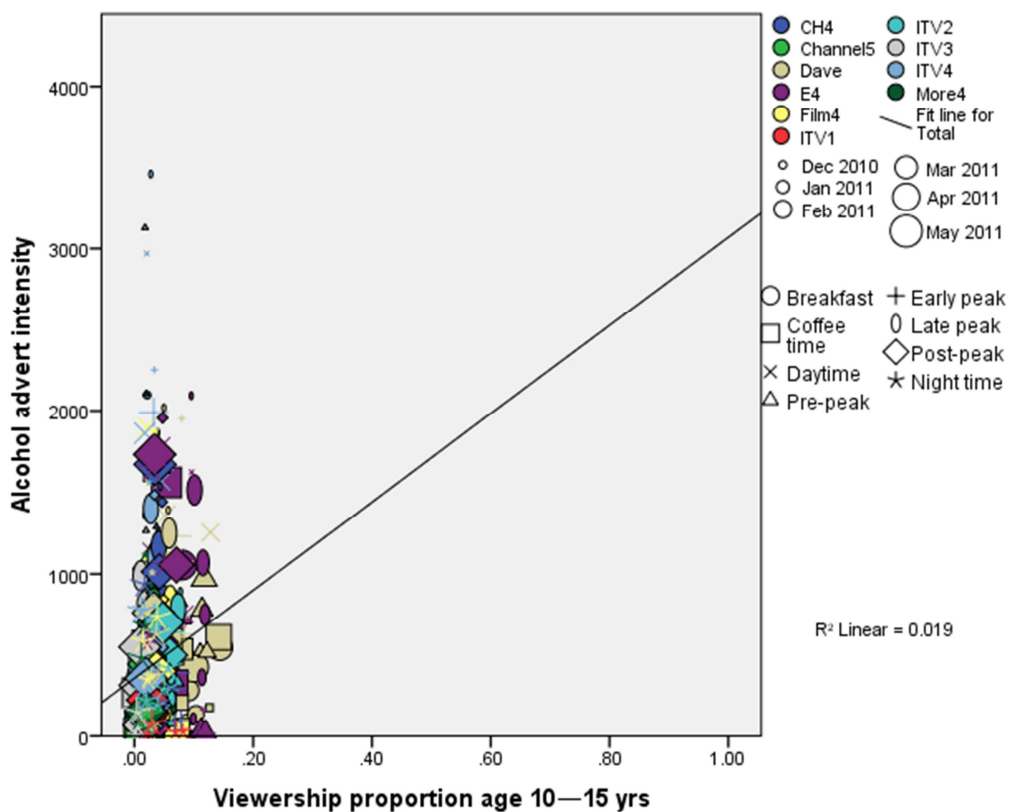


Figure 2.11: Scatterplot of advertising intensity by viewership proportion for children and adolescents aged 10–15 years, UK, December 2010 to May 2011

Young people aged 16–24 accounted for viewership proportions of up to 50 per cent. Figure 2.12 illustrates how E4 had a very high viewership in this age group. As shown in

Figure 2.2, the proportion of those aged 16–24 years in the general population was 13 per cent in 2011; yet there were several instances in which their proportion of the television viewership was much higher, in particular for channels Dave, Channel 4 and ITV2. The fitted regression line points to a positive association between advert intensity and viewership proportion for those aged 16–24 years ($R=0.15$).

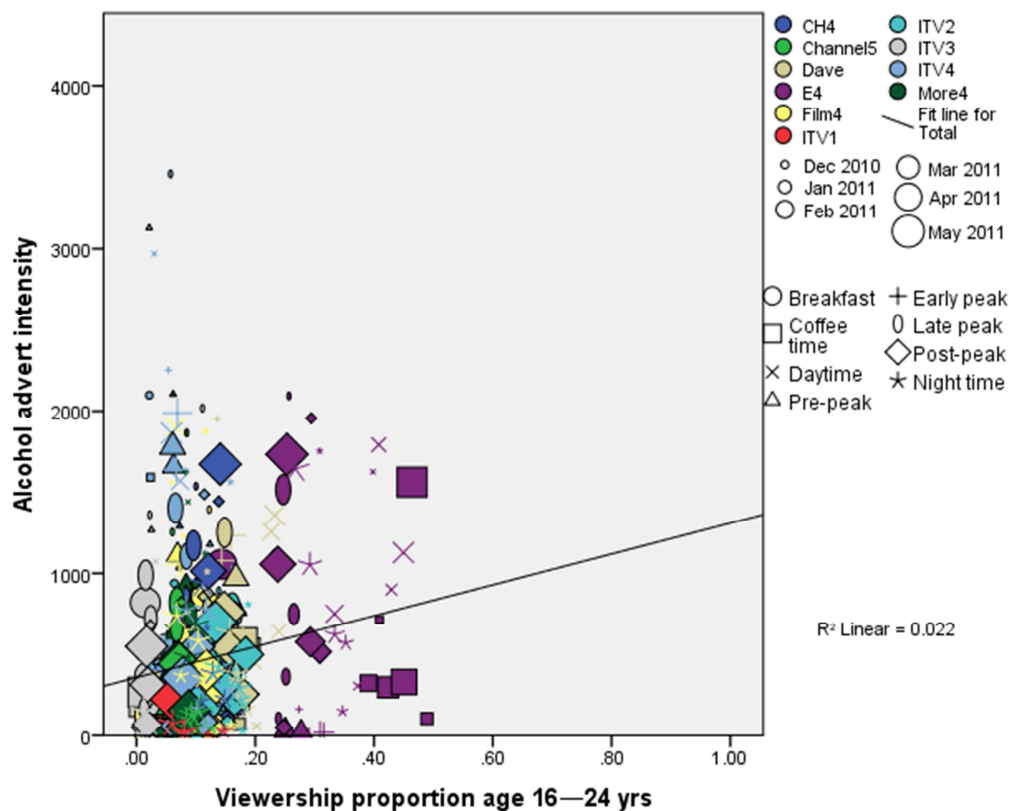


Figure 2.12: Scatterplot of advertising intensity by viewership proportion for young people aged 16–24 years, UK, December 2010 to May 2011

The adult viewership proportion ranged from around 45 per cent to almost 100 per cent, with the proportions lowest for channel E4 and highest on ITV3 (Figure 2.13). The fitted regression line points to a negative association between advert intensity and viewership proportion for age group 25 plus years ($R=0.11$).

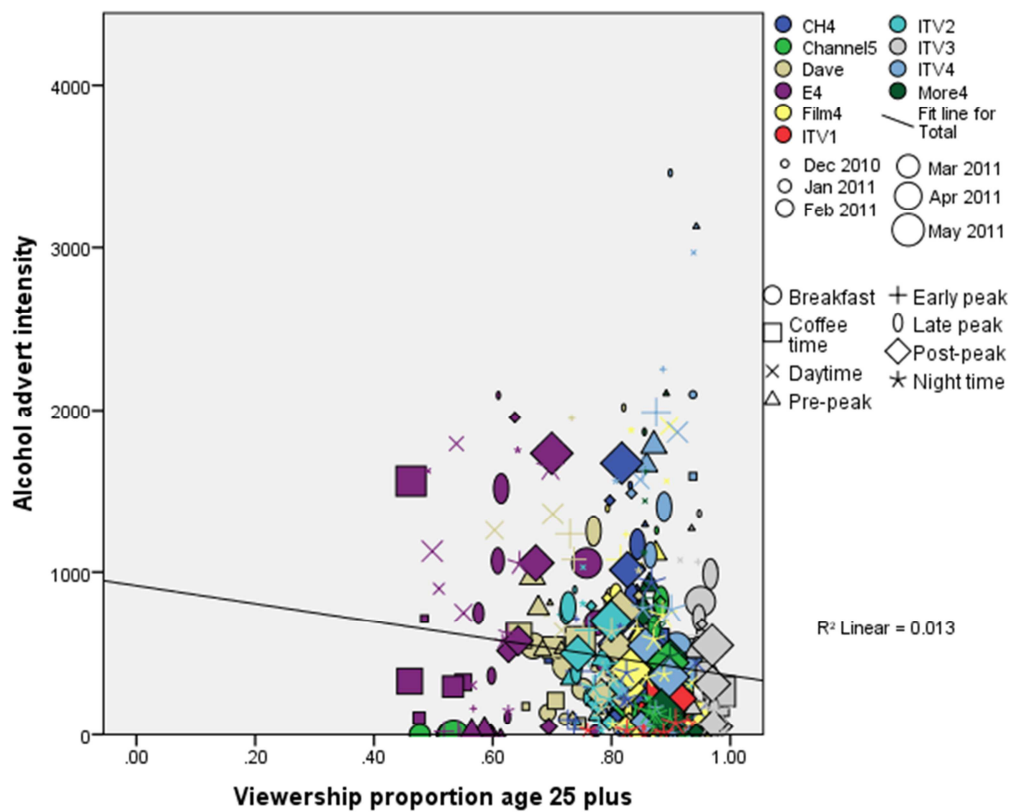


Figure 2.13: Scatterplot of advertising intensity by viewership proportion for adults (age 25+), UK, December 2010 to May 2011

Relative levels of youth exposure to alcohol advertising

Table 2.6 shows the findings of the negative binomial regression analysis that sought to assess whether younger people in the audience are more likely to be exposed to alcohol advertising than adults (ages 25 years and older). Results are presented as incidence rate ratio (IRR), which describe the amounts by which alcohol advert intensity is multiplied for a given age category, relative to a reference age category. Statistically significant findings are given in bold, for clarity.

Table 2.6: Incidence rate ratios (IRRs) for being exposed to alcohol adverts compared with ages 25+ years, by age group and across alcohol beverage type, UK

	Overall or joint significance test	Age 4–9			Age 10–15			Age 16–24		
	Chi ² , p	IRR	p-value	95% CI	IRR	p-value	95% CI	IRR	p-value	95% CI
All alcoholic beverages	83.00, p<0.01	0.83	<0.01	0.80,0.88	1.11	<0.01	1.06,1.18	1.02	0.01	1.01,1.03
Beer and cider	59.01, p<0.01	0.79	<0.01	0.72,0.86	1.15	<0.01	1.07,1.23	1.02	<0.01	1.01,1.04
Wines	23.94, p<0.01	0.90	<0.01	0.84,0.96	1.05	0.24	0.97,1.14	1.03	0.03	1.00,1.06
Spirits	18.14, p<0.01	0.85	<0.01	0.78,0.92	1.09	0.08	0.99,1.20	1.00	0.69	0.98,1.03
Combination	23.99, p<0.01	0.84	<0.01	0.76,0.93	1.18	<0.01	1.08,1.28	1.01	0.53	0.98,1.03
Ready-mix	83.26, p<0.01	0.45	<0.01	0.35,0.58	1.51	<0.01	1.27,1.78	1.06	<0.01	1.03,1.09

We find that, in the UK during December 2010 and May 2011, children aged 4–9 years were exposed to significantly fewer alcohol adverts compared with adults aged 25 years and older than would be expected given their viewership patterns. This association holds for all alcoholic beverages, combined as well as each individual beverage category studied. Conversely, children and adolescents aged 10–15 years were exposed to significantly more alcohol adverts than adults (aged 25+), than would be expected given their viewership patterns. In the case of ready-mix drinks, this group (10–15 years) was exposed to 51 percent more advertising than adults. The IRR for those aged 16–24 was also significantly higher but the size of the effect was small, at 1.02 for all alcoholic beverages combined.

In an additional sensitivity analysis we also compared youth exposure with those aged 16 years and older as a reference. In this analysis the principal findings remain largely unaltered (Table 2.7). Compared with those aged 16 and older, those aged 4–9 were less exposed to alcohol adverts while those aged 10–15 years were more exposed, given their viewership patterns. For the latter group, exposure was even stronger than when compared with the 25+ age group. There were also statistically significant increases for adverts for wines and spirits.

Table 2.7: Incidence rate ratios (IRRs) for being exposed to alcohol adverts compared with ages 16+ years, by age group and across alcohol beverage type, UK

	Overall or joint significance test	Age 4–9			Age 10–15		
	Chi ² , p	IRR	p-value	95% CI	IRR	p-value	95% CI
All alcoholic beverages	67.50, p<0.01	0.82	<0.01	0.78,0.86	1.16	<0.01	1.1,1.22
Beer and cider	48.18, p<0.01	0.75	<0.01	0.68,0.82	1.21	<0.01	1.14,1.29
Wines	20.59, p<0.01	0.88	<0.01	0.83,0.94	1.11	<0.01	1.04,1.20
Spirits	17.76, p<0.01	0.85	<0.01	0.78,0.92	1.10	0.02	1.01,1.20
Combination	22.81, p<0.01	0.84	<0.01	0.75,0.93	1.19	<0.01	1.11,1.28
Ready-mix	69.17, p<0.01	0.38	<0.01	0.3,0.48	1.81	<0.01	1.55,2.12

Since extreme values can sometimes drive the findings of a given analysis, we further examined the extent to which selected dayparts and channels may have influenced our results. In an additional set of analyses, we (i) excluded three dayparts of ITV4 with very high levels of alcohol intensity in December 2010 (Figure 2.10); and (ii) excluded channels E4 and Dave, which show high viewership among 10–15 year olds, and Channel 5 breakfast dayparts, which show high viewership among 4–9 olds (Figure 2.11). These additional analyses did not substantially alter our findings (Table 2.8).

Table 2.8: Incidence rate ratios (IRRs) for being exposed to alcohol adverts compared with ages 25+ years, by age group and across alcohol beverage type, UK: sensitivity analyses

	Overall or joint significance test	Age 4–9			Age 10–15			Age 16–24		
	Chi ² , p	IRR	p-value	95% CI	IRR	p-value	95% CI	IRR	p-value	95% CI
All alcoholic beverages; three dayparts with highest levels of alcohol advert intensity excluded	78.52, p<0.01	0.84	<0.01	0.80,0.88	1.12	<0.01	1.06,1.18	1.02	<0.01	1.01,1.04
All alcoholic beverages; channels E4 and Dave and Channel 5 breakfast dayparts excluded	59.01, p<0.01	0.86	0.01	0.76, 0.96	1.16	0.02	1.03, 1.32	0.96	0.05	0.93, 1.00

2.2.3 Quantifying exposure to alcohol advertising on television: the Netherlands

Patterns of viewership by age, across months, dayparts and channels

Figure 2.14 shows the average viewership of the top ten most viewed channels in the Netherlands by age from December 2010 to May 2011. In contrast to the UK (and Germany), data for the Netherlands distinguish three age groups only. Overall, during this period, those aged 6–12 accounted for 3.5 per cent of the total viewership, while children and adolescents aged 13–19 accounted for 4.6 per cent. Those aged 20 years and more accounted for the remaining 91.9 per cent.

The proportion of television viewership among those aged 20 and older as assessed here is higher than the share of this group in the general population, with that of younger groups lower (Figure 2.14).⁴⁷

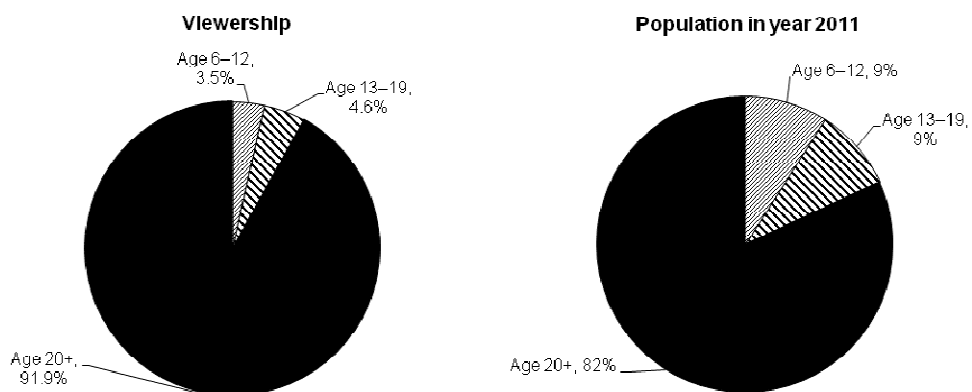


Figure 2.14: Comparison of the proportion of TV viewers to the Netherlands population, by age

Similar to what we observed for the UK (Figure 2.3, page 18), there was some fluctuation in total viewership across months; viewership was high in the winter months and subsequently fell through to May 2011. However, the relative viewership by age remained relatively stable.

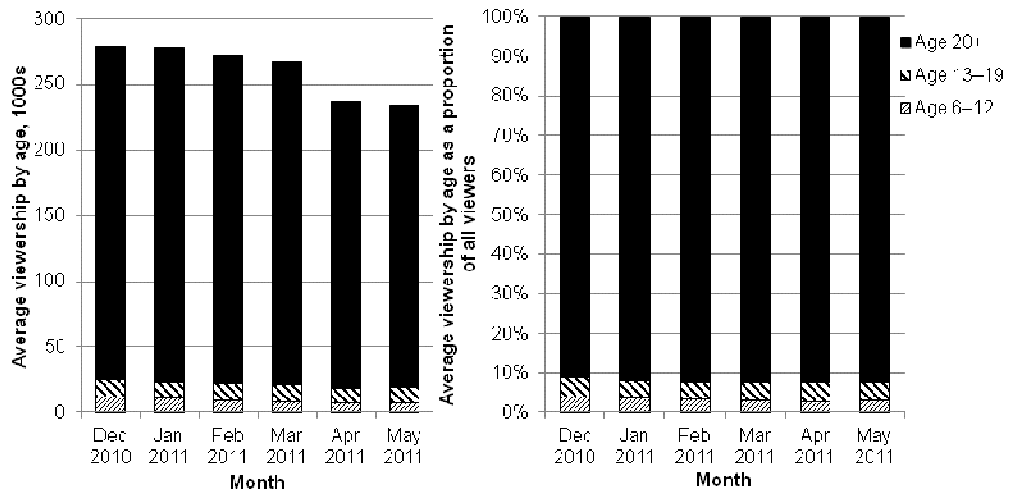


Figure 2.15: Absolute and relative viewership of the ten most viewed channels, by age and across months, the Netherlands, December 2010 to May 2011

Again similar to what was observed for the UK, there was variation in viewership across dayparts (Figure 2.16). As described earlier, the data profile for the Netherlands differed from that for the UK and Germany, containing data for five dayparts only. The highest average viewership was seen for the daypart 20.00–22.30 hours, followed by the earlier 18.00–19.59 daypart. The age distribution was comparatively stable across the dayparts; the only exception was for a smaller viewership proportion for children aged 6–12 in the 22.30–02.00 daypart and higher levels of viewership for ages 13–19 group in the 20.00–22.30 and 22.30–02.00 dayparts.

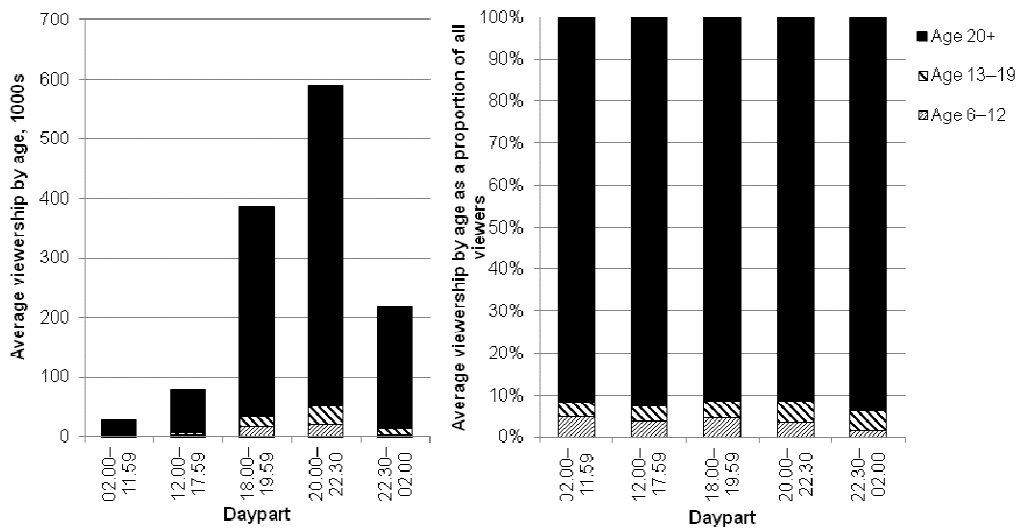


Figure 2.16: Absolute and relative viewership of the ten most viewed channels, by age and daypart, the Netherlands, December 2010 to May 2011

There was large variation in viewership by channel (Figure 2.17). The highest viewership was recorded for NL1, followed by RTL4. These were not the channels with the highest youth viewership, however. These were NL3 (ages 6–12) and RTL5 (ages 13–19), which had an under-20 viewership of around 15 per cent. For all channels the viewership in the under-20 age group was lower than their proportion in the Dutch population.

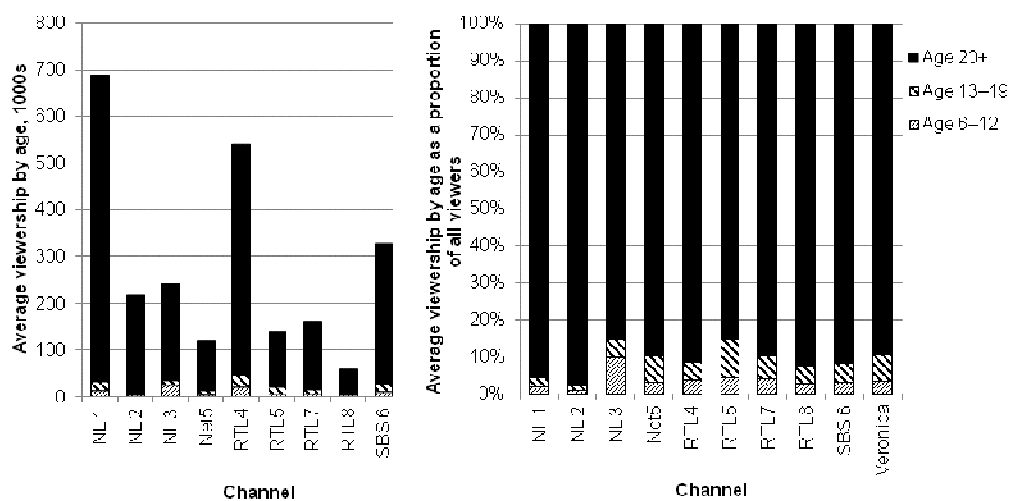


Figure 2.17: Absolute and relative viewership of the ten most viewed channels, by age and television channel, the Netherlands, December 2010 to May 2011

Patterns of alcohol advertising across months, dayparts and channels

Between December 2010 and May 2011, a total of 8,887 adverts of alcoholic products (total duration 58.15 hours) and 1,113 adverts of alcohol-free beer and wines (total duration 6.48hrs) were broadcasted on the top ten most viewed channels in the Netherlands. These were considerably fewer than the number of alcohol adverts broadcast in the UK during the same period (44,483). Figure 2.18 shows their distribution by beverage type. More than half (55 per cent) of all adverts related to beer, and 10 per cent to cider. Wine only constituted a small proportion of all alcohol adverts, at 2 per cent. In contrast, there was a high proportion of adverts for alcohol-free products (mainly beers) (11 per cent).

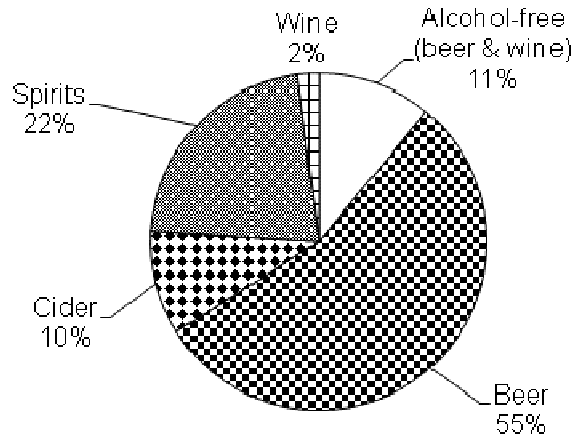


Figure 2.18: Distribution of alcohol advertising on the ten most viewed channels in the Netherlands by product category, December 2010 to May 2011

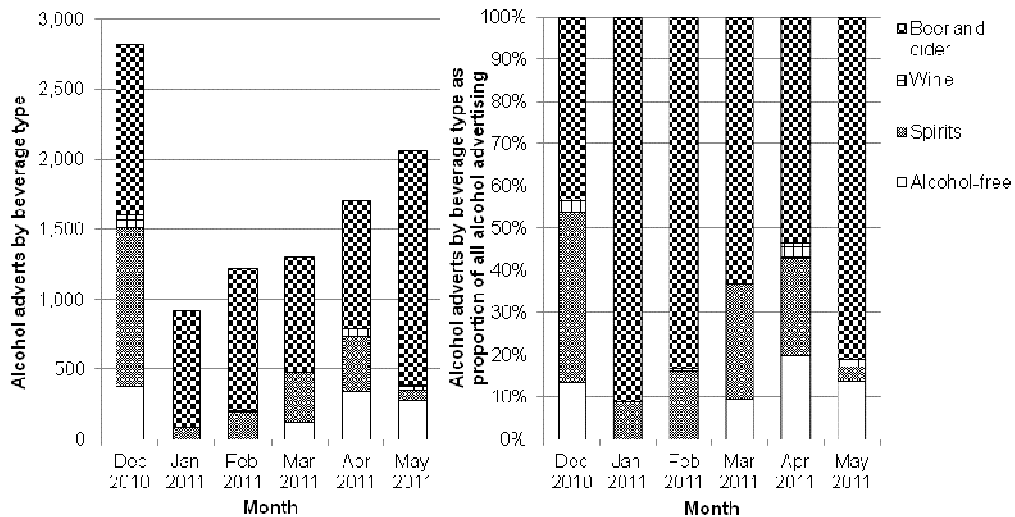


Figure 2.19: Absolute and relative number of alcohol adverts shown on the the ten most viewed channels, by beverage type and month, the Netherlands, December 2010 to May 2011

The highest number of alcohol adverts was shown in December 2010 while the lowest number appeared in January 2011, followed by a steady increase to May 2011 (Figure 2.19), a pattern similar to that observed for the UK. Also similar to the UK, and in line with the variation across month, the placement of advertisements for different alcoholic beverages also varied, with the number of adverts for spirits highest in December. Beer and cider adverts were broadcast throughout the period. There were no adverts for alcohol-free beers and wines in February or March 2011.

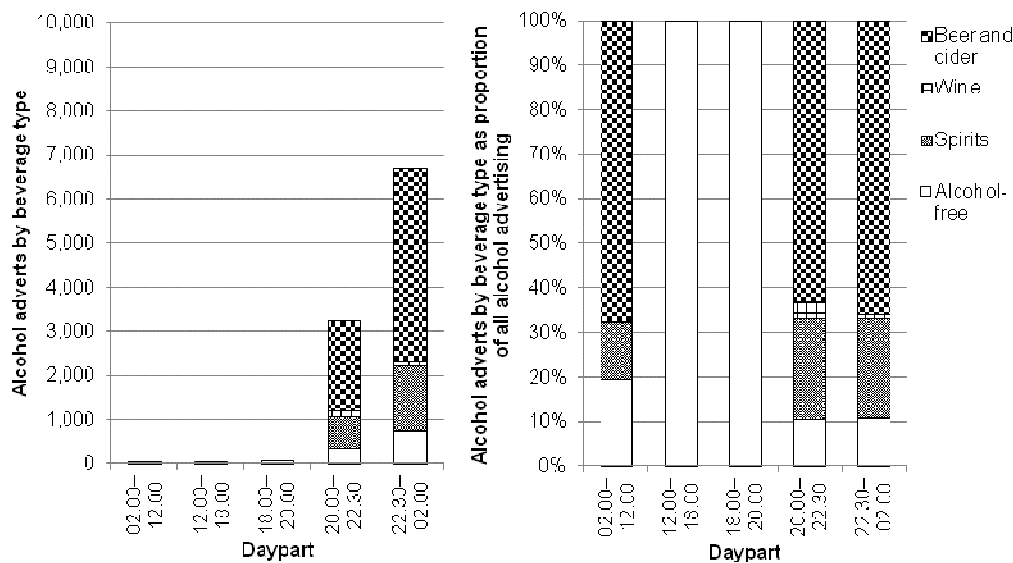


Figure 2.20: Absolute and relative number of alcohol adverts shown on the ten most viewed channels, by beverage type and daypart, the Netherlands, December 2010 to May 2011

As noted earlier, in the Netherlands, alcohol advertising is banned between 06.00 and 21.00 hours. Consequently, we did not identify any screening of alcohol adverts during this time; however, there were advertisements of alcohol-free beer in the 12.00–18.00 and 18.00–20.00 dayparts (Figure 2.20). Almost all alcohol advertisements were confined to the periods 20.00–22.30 and 22.30–02.00, with a higher number of adverts in the later daypart. There was little difference between these two dayparts in the proportion of adverts related to the different product categories.

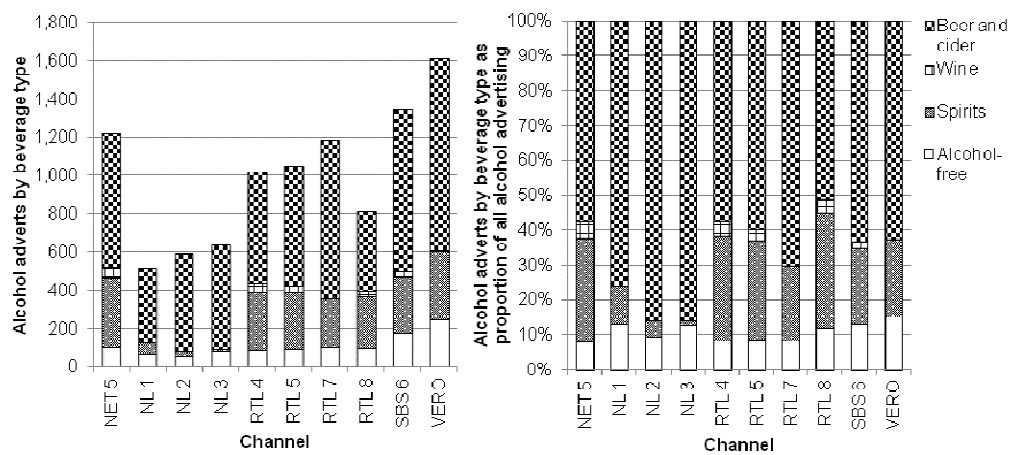


Figure 2.21: Absolute and relative number of alcohol adverts shown on the ten most viewed channels, by beverage type and channel, the Netherlands, December 2010 to May 2011

The frequency of alcohol advertising varied across channels, with the highest number broadcast on Veronica, followed by SBS6 (Figure 2.21). The proportion of alcohol adverts also varied by beverage type; however, beer and cider remained the largest product category advertised across all channels.

Exposure to alcohol advertising by age group

Bringing viewership and alcohol advertising together in the form of alcohol advert intensity, across months, channels and dayparts, we find that the alcohol advert intensity varied widely, although the highest alcohol advert intensity was still considerably lower than that seen for the UK (Figure 2.22).

Figure 2.22 plots alcohol advert intensity against proportional viewership for children aged 6–12 years. Channels, months and dayparts are illustrated by different symbols (daypart), of different colours (channels) and size (month). We find that alcohol advert intensity across the channels, months and dayparts varied from 0 to just over 200. There was a higher proportion of viewers in this age group during the 20.00–22.30 daypart, and a lower proportion but higher alcohol advert intensity in the 22.30–02.00 daypart. The highest alcohol advert intensity was during the late daypart, 22.30–02.00, in particular RTL 4. There were no channel, month, daypart combinations where children aged 6–12 accounted for more than 9 per cent of the viewership (Figure 2.22), which is the share of this age group in the general population (see Figure 2.14). Regressing alcohol advert intensity against viewership proportion points to a negative association ($R = -0.14$).

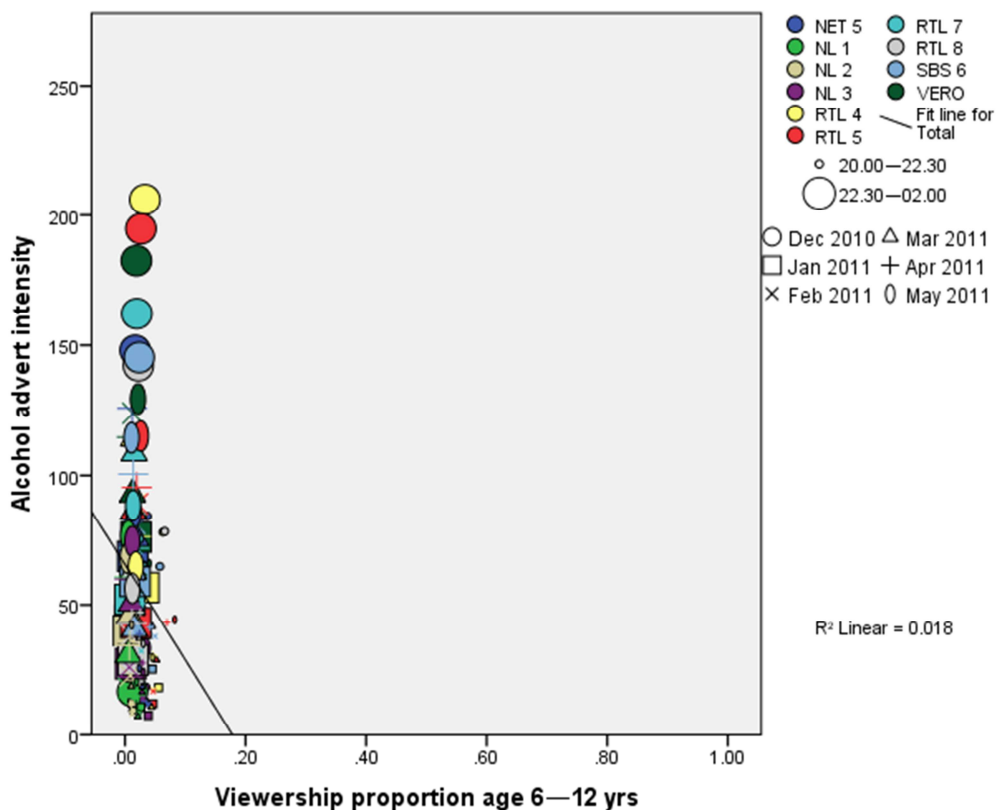


Figure 2.22: Scatterplot of advertising intensity by viewership proportion for children (age 6–12), Netherlands, December 2010 to May 2011

Those aged 13–19 years similarly accounted for a small proportion of total viewership across channels. RTL5 showed both a high viewership proportion of this age group, which was higher than the share of this group in the general population (at 9 per cent), and high

alcohol advertising intensity. Conversely, NL1 and NL2, which showed low alcohol advertising intensity, had low viewership in this age group. The regression points to a positive association between the advert intensity and viewership proportion for the age group 13–19 years ($R=0.33$).

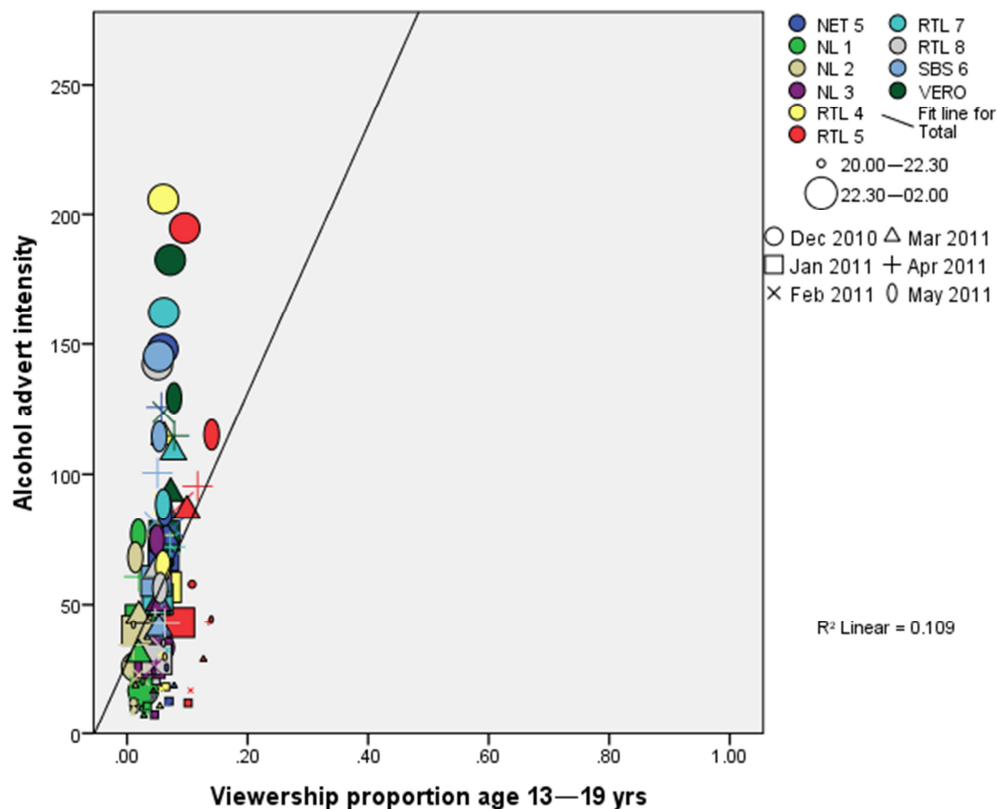


Figure 2.23: Scatterplot of advertising intensity by viewership proportion for adolescents (age 13–19), Netherlands, December 2010 to May 2011

The adult viewership proportion ranged from around 80 per cent to almost 100 per cent, with low viewership of the alcohol-advert-heavy RTL5, and high viewership of NL1 and NL2, which have the lowest intensity of alcohol advertising (Figure 2.24). The regression suggests there is a negative association between the advert intensity and viewership proportion for this age group ($R=-0.18$).

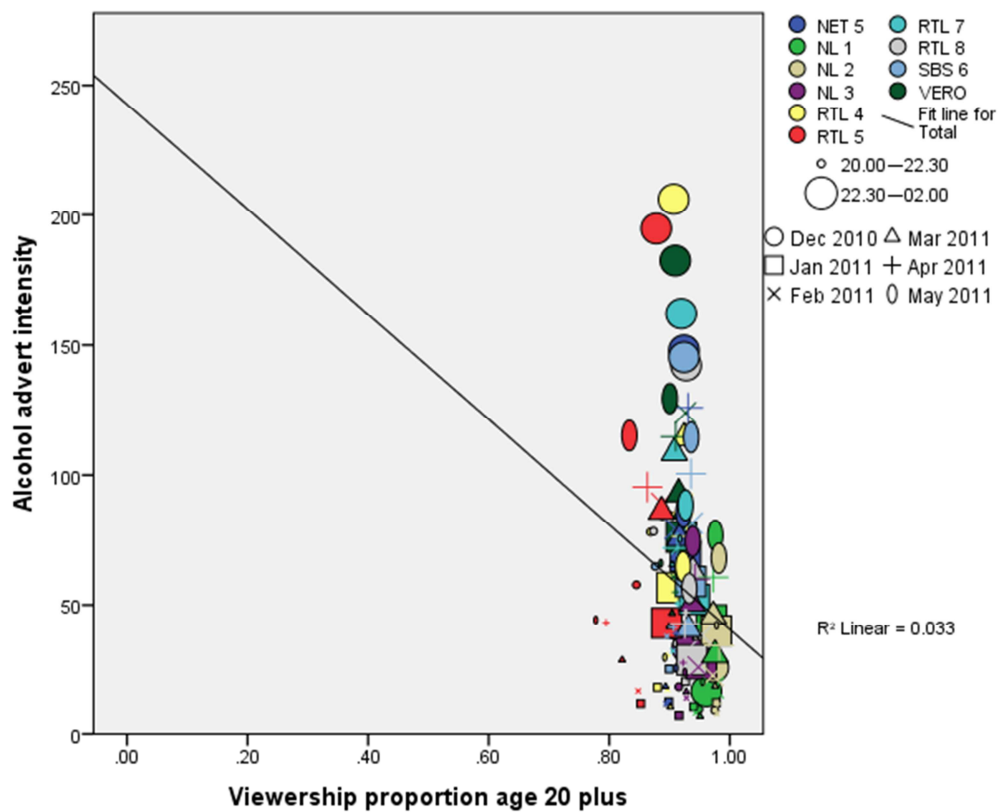


Figure 2.24: Scatterplot of advertising intensity by viewership proportion for adults (age 25+), Netherlands, December 2010 to May 2011

Relative levels of youth exposure to alcohol advertising

Table 2.9 shows the findings of the negative binomial regression analysis, which sought to assess whether younger people in the audience are more likely to be exposed to alcohol advertising than adults (ages 20 years and older), after taking into account their viewership patterns. Statistically significant results are shown in bold.

We find that, in the Netherlands, during December 2010 to May 2011, children aged 6–12 years were exposed to significantly fewer alcohol adverts than adults aged 20 and older, than would be expected given their viewership patterns. This association held for all alcoholic beverages combined as well as for beer and cider, spirits and alcohol-free beverages. There was no evidence of differential exposure to wine adverts for children aged 6–12 and adults. Conversely, adolescents and young adults aged 13–19 years were exposed to significantly more alcohol adverts than adults (20+) than would be expected from their viewership patterns. The all alcoholic beverage group was 1.29 times more exposed than adults, increasing to 1.45 for spirits and to 1.63 for wines. However, the latter group shows a rather wide confidence interval, reflecting the small number of wine adverts overall.

Table 2.9: Incidence rate ratios (IRRs) for being exposed to alcohol adverts compared with adults, by age group and across alcohol beverage type, the Netherlands

	Joint significance test	Age 6–12			Age 13–19		
	Chi ² , p	IRR	P-value	95% CI	IRR	P-value	95% CI
All alcoholic beverages	61.78, p<0.01	0.69	<0.01	0.62, 0.77	1.29	<0.01	1.19, 1.39
Beer and cider	94.17, p<0.01	0.62	<0.01	0.57, 0.69	1.28	<0.01	1.19, 1.37
Wines	6.96, p=0.03	1.10	0.63	0.75, 1.62	1.63	0.02	1.08, 2.46
Spirits	12.16, p<0.01	0.80	0.07	0.62, 1.02	1.45	<0.01	1.17, 1.82
Alcohol-free	15.31, p<0.01	0.58	<0.01	0.44, 0.76	1.36	<0.01	1.13, 1.63

2.2.4 Quantifying exposure to alcohol advertising on television: Germany

Patterns of viewership by age, across months, dayparts and channels

Figure 2.25 shows the total viewership of the ten most viewed channels in Germany by age from December 2010 to May 2011. Overall, during this period, those aged 4–9 accounted for 2 per cent of the total viewership, while children and adolescents aged 10–15 accounted for 3 per cent. Those aged 16–24 constituted 6 per cent of the total viewership, while the largest group of those aged 25 years and more accounted for the remaining 89 per cent. There was some fluctuation in total viewership across months. The proportion of each age group remained relatively stable, with the exception of February 2012, when the proportion of under-16 viewers temporarily increased to 7 per cent of the total viewership that month.

The proportion of television viewership among those aged 25 and older as assessed here is higher than the share of this group in the general population, with that of younger groups lower (Figure 2.25).⁴⁷

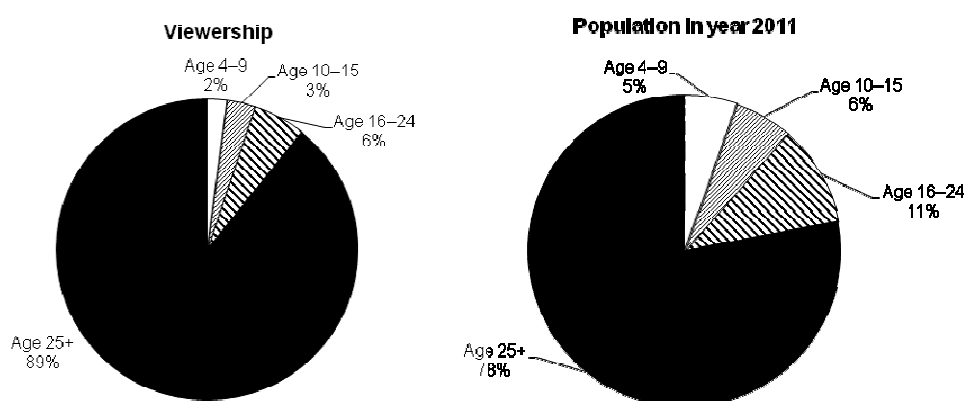


Figure 2.25: Comparison of the proportion by age of TV viewers to the German population

Similar to what we observed for the UK (Figure 2.3, page 18), there was some fluctuation in total viewership across months; viewership was high in the winter months and subsequently fell through to May 2011 (Figure 2.26). However, the relative viewership by age remained relatively stable.

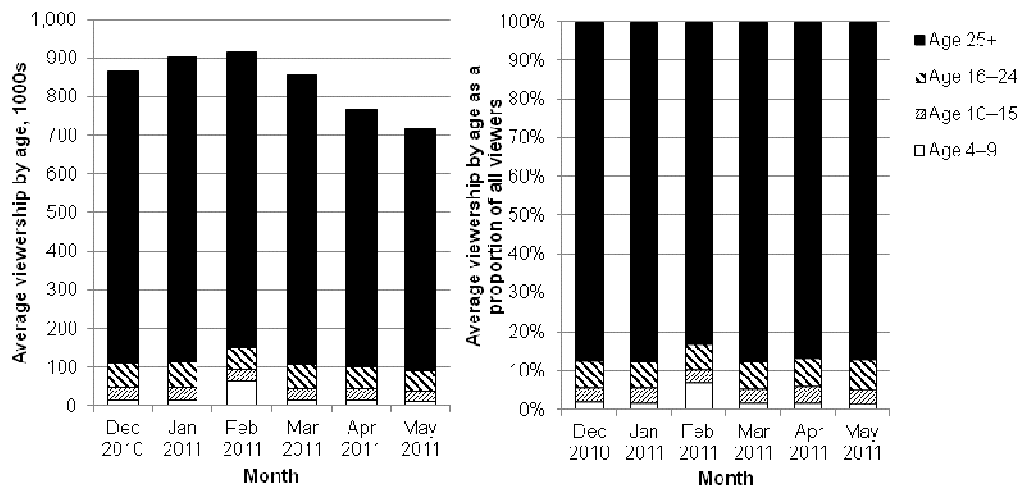


Figure 2.26: Absolute and relative viewership of the ten most viewed channels, by age and across months, Germany, December 2010 to May 2011

Again similar to the UK, and the Netherlands, there was variation in viewership across dayparts (Figure 2.27). The highest average viewership was seen for the ‘early peak’ at 17.25–19.59 hours, closely followed by the ‘late peak’ daypart (20.00–22.59 hours). The age distribution varied slightly, with the highest proportion of viewers in the 4–9 age group during the breakfast daypart, and the largest proportion of viewers aged 16–24 during the ‘night time’ daypart (00.30–05.59 hours). This pattern was also seen in the UK (Figure 2.8).

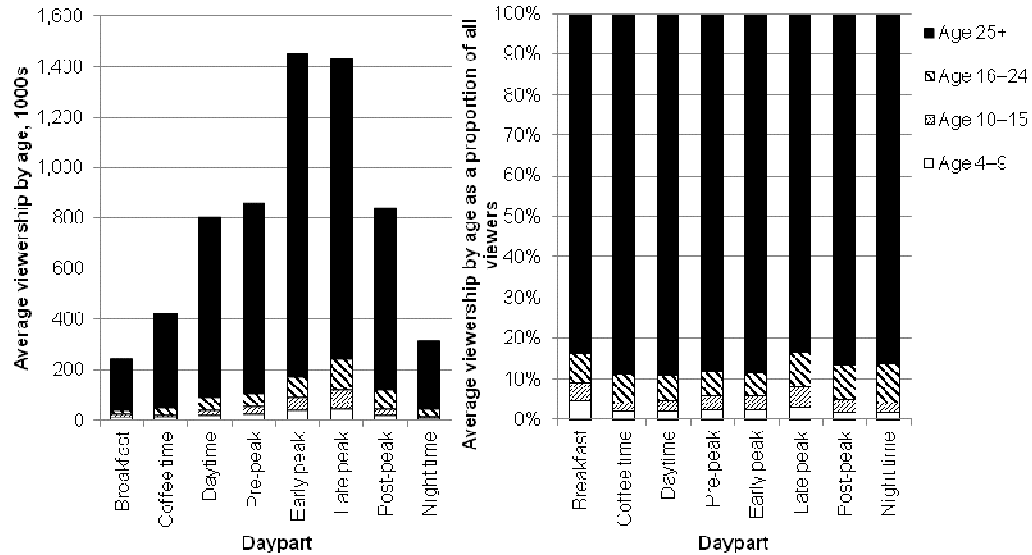


Figure 2.27: Absolute and relative viewership of the ten most viewed channels, by age and daypart, Germany, December 2010 to May 2011.

Similarly, variation was seen in viewership by channel (Figure 2.28). The highest viewership was recorded for the public service channel ARD, followed by ZDF (also public service) and RTL. There was considerable variation in the age groups that view different channels, with children and adolescents ages 4–15 constituting a higher proportion of

Super RTL viewers (just under 40 per cent) than for any other channel, followed by Kabel 1 and Pro7. Pro7 also showed a high viewership among the 16–24 age group.

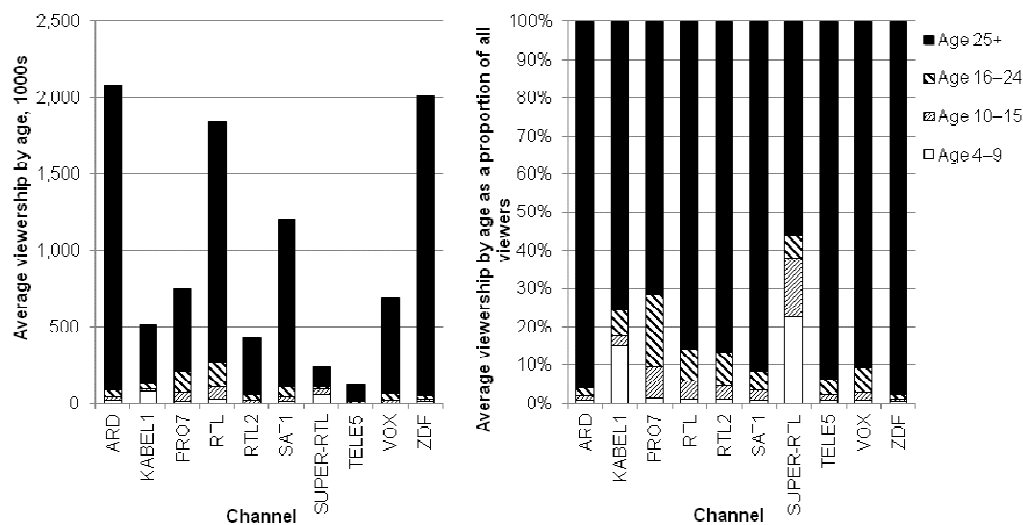


Figure 2.28: Absolute and relative viewership of the ten most viewed channels, by age and television channel, Germany, December 2010 to May 2011

Patterns of alcohol advertising across months, dayparts and channels

Between December 2010 and May 2011, a total of 9,619 adverts of alcoholic products (total duration 51.50 hours) and 2,151 adverts of alcohol-free beer and wines (total duration 8.86 hours) were broadcasted on the ten most viewed television channels in Germany. Once again this was considerably lower than the number of alcohol adverts broadcast in the UK during the same period (44,483) but fairly similar to the number broadcast in the Netherlands, where 8,887 adverts of alcoholic products were broadcast during this time. Figure 2.29 shows the distribution of advertising by beverage type. Beer and spirits formed the largest proportion of adverts, at 45 per cent and 26 per cent, respectively, followed by wine (7 per cent) and ready-mixed drinks (4 per cent). There was a comparatively large proportion of adverts for alcohol-free beverages, at 18 per cent, compared with 11 per cent in the Netherlands.

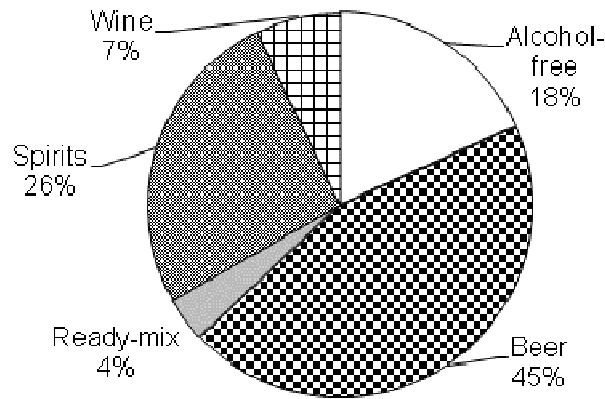


Figure 2.29: Distribution of alcohol advertising on the ten most viewed channels in Germany by product category, December 2010 to May 2011

Similar to what was seen in the UK and the Netherlands, the highest number of alcohol adverts was shown in December 2010 while the lowest number appeared in January 2011, followed by a steady increase to April and May 2011 (Figure 2.30). In line with the variation by month, the placement of advertisements for different alcoholic beverages also varied, with the number of adverts for spirits and wines highest in December. Beer adverts were broadcast throughout the period. Similar to what we observed for the Netherlands, adverts for alcohol-free beverages were rare in January and February.

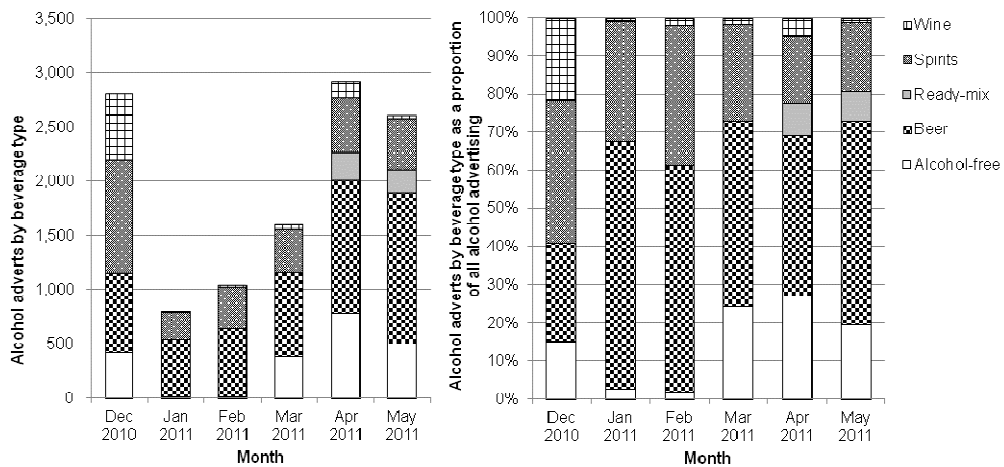


Figure 2.30: Absolute and relative number of alcohol adverts shown on the ten most viewed channels, by beverage type and month, Germany, December 2010 to May 2011

Alcohol advertising also varied by the time of the day, with the highest number broadcast in the ‘late peak’ (20.00–22.59 hours), and the lowest number during ‘breakfast’ (6.00–9:29 hours) (Figure 2.31).

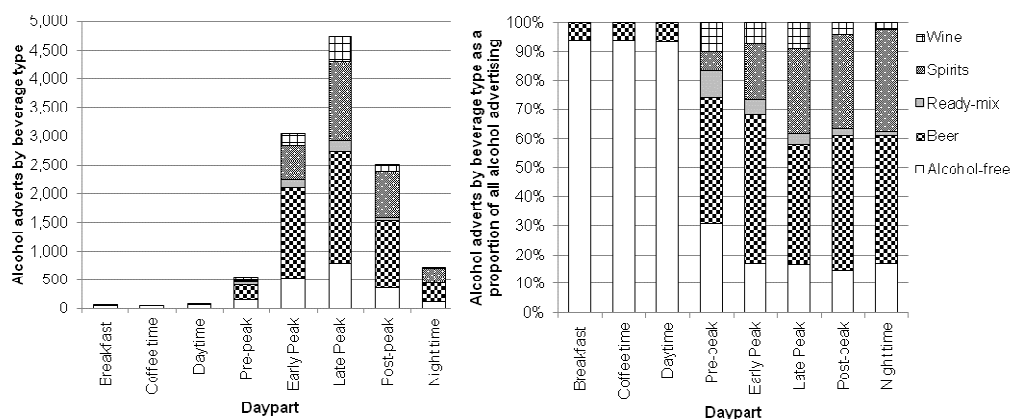


Figure 2.31: Absolute and relative number of alcohol adverts shown on the ten most viewed channels, by beverage type and daypart, Germany, December 2010 to May 2011

The frequency of alcohol advertising varied considerably across channels, with the highest number broadcast on RTLII, followed by Kabel1, Tele5 and Pro7 (Figure 2.32). The proportion of alcohol adverts also varied by beverage type, but beer and spirits remained the largest product categories across all channels. Beer appears to be the main product broadcast on Tele5 while alcohol-free products were mostly shown on SuperRTL, which mainly broadcasts children's programmes.⁴⁸

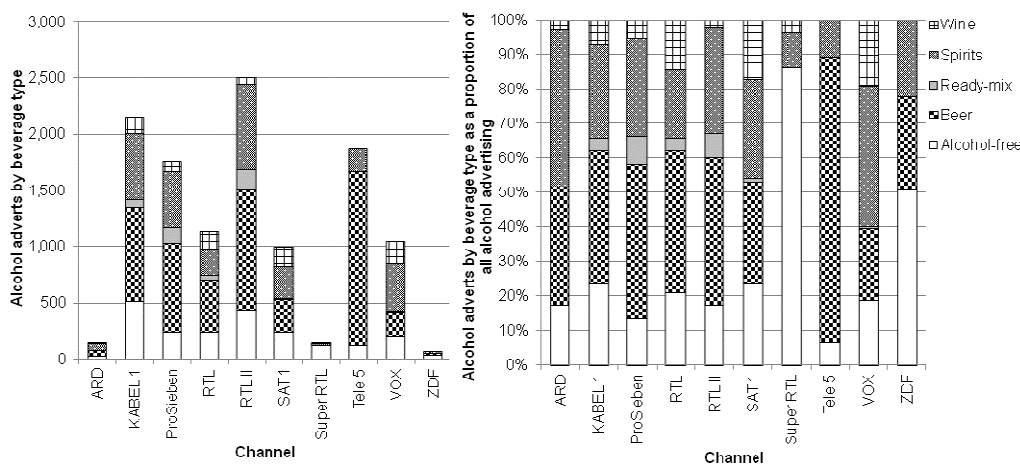


Figure 2.32: Absolute and relative number of alcohol adverts shown on the ten most viewed channels, by beverage type and channel, Germany, December 2010 to May 2011

Exposure to alcohol advertising by age group

Figure 2.33 plots alcohol advert intensity against proportional viewership for children aged 4–9 years. Channels, months and dayparts are illustrated by different symbols (daypart), colours (channels) and sizes (month). We find that alcohol advert intensity across the channels, months and dayparts varied from 0 to 200. Several of Kabel1, Pro7 and RTL2 dayparts displayed high alcohol advert intensity. For most of the data points, children aged 4–9 formed a very small proportion of viewership across most channels, typically under 10 per cent. There were several instances, where children aged 4–9 accounted for more than 5 per cent of the viewership (Figure 2.33), which is their share in the general population in

Germany (Figure 2.25). This was mostly the case for the channels Kabel1, SuperRTL and TELE5 in early dayparts. SuperRTL and TELE5 did not generally show alcohol adverts during this time, while some alcohol advertising was broadcast on KABEL1. Regressing alcohol advert intensity against proportion viewership points to a negative association for age group 6–12 years ($R=-0.18$).

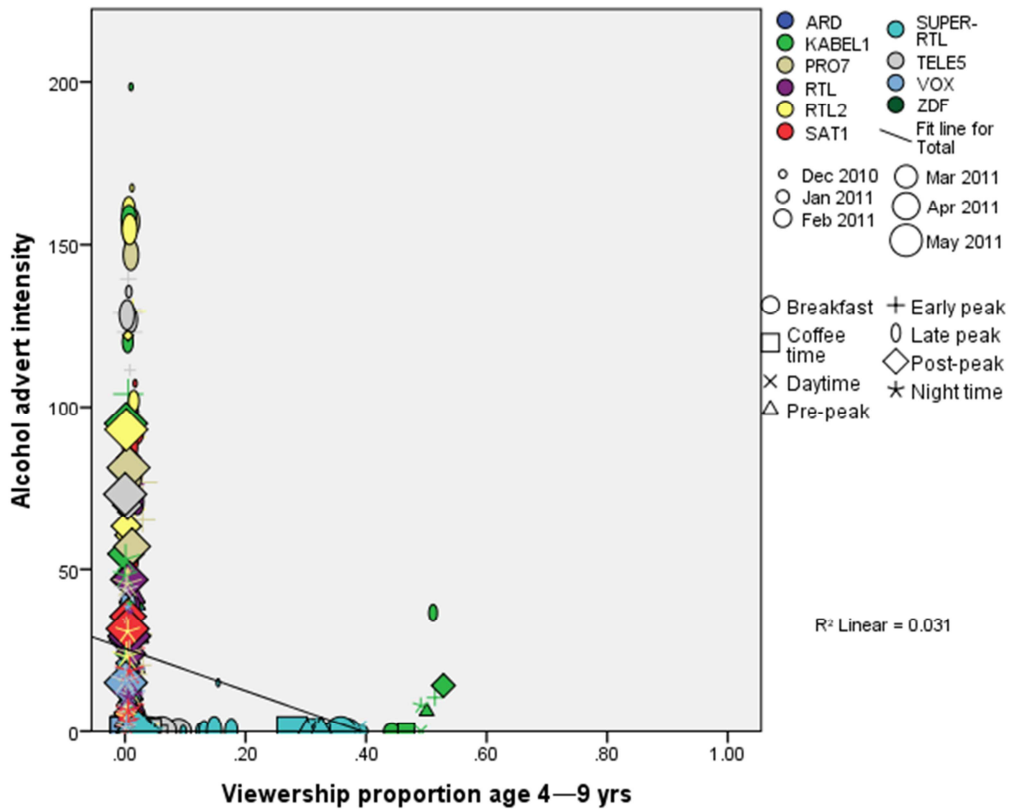


Figure 2.33: Scatterplot of advertising intensity by viewership proportion for children aged 4–9 years, Germany, December 2010 to May 2011

Those aged 10–15 years accounted for up to 30 per cent of viewership by channel, month and daypart (Figure 2.34), compared with their proportion in the general population of 6 per cent (see Figure 2.25). Instances in which the children and adolescents in this age group accounted for more than 6 per cent of the viewership were predominantly seen for the channels SuperRTL and Pro7. SuperRTL had the highest viewership but very little alcohol advertising (Figure 2.34). By contrast, several of Kabel1, Pro7 and RTL2 dayparts displayed high alcohol advert intensity. The regression points to a negative association between advert intensity and viewership proportion for the age group 10–15 years ($R=-0.14$).

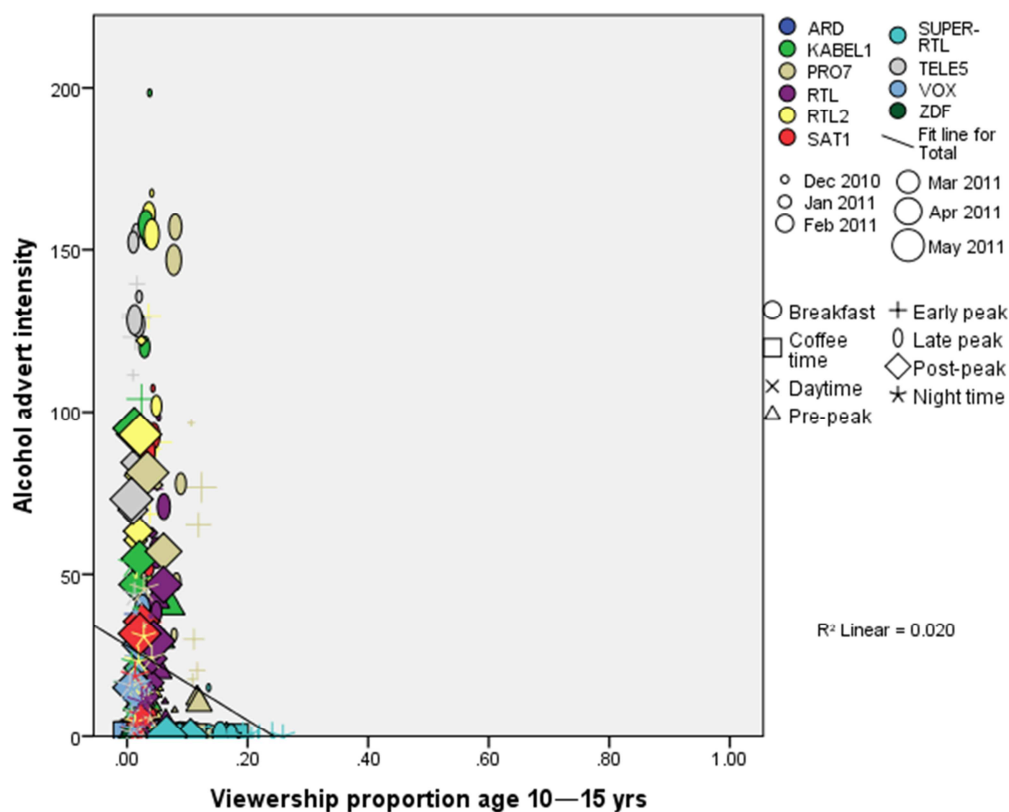


Figure 2.34: Scatterplot of advertising intensity by viewership proportion for children and adolescents aged 10–15 years, Germany, December 2010 to May 2011

Young people aged 16–24 accounted for viewership proportions of up to 40 per cent (Figure 2.35), although for the majority of channels, months and dayparts viewership was below 20 per cent, compared with their share in the general population of 11 per cent (see Figure 2.25). As shown in Figure 2.35, there were many channel, month, daypart combinations where those aged 16–24 constituted more than 11 per cent of the viewership. In this group, Pro7 showed both a (relatively) high viewership proportion and a wide range of alcohol advert intensity. There was no statistically significant association between the advert intensity and viewership proportion for the age group 16–24 years ($R = -0.14$).

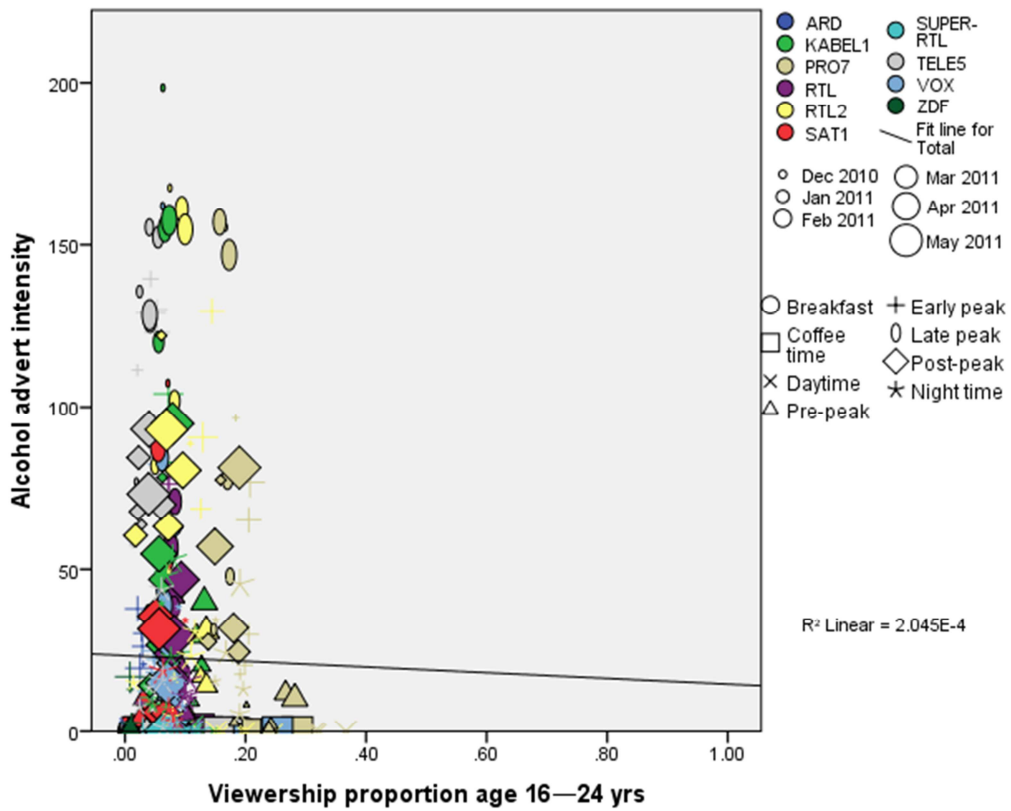


Figure 2.35: Scatterplot of advertising intensity by viewership proportion for young people aged 16–24 years, Germany, December 2010 to May 2011

The adult viewership proportion ranged from around 40 per cent to almost 100 per cent with the lowest proportions of adult viewership for Kabel1 and SuperRTL and highest on Tele5 (Figure 2.36). Kabel1, RTL2 and Tele5 had the highest alcohol advert intensity. The regression points to a positive association between the advert intensity and viewership proportion for those aged 25+ (R=0.17).

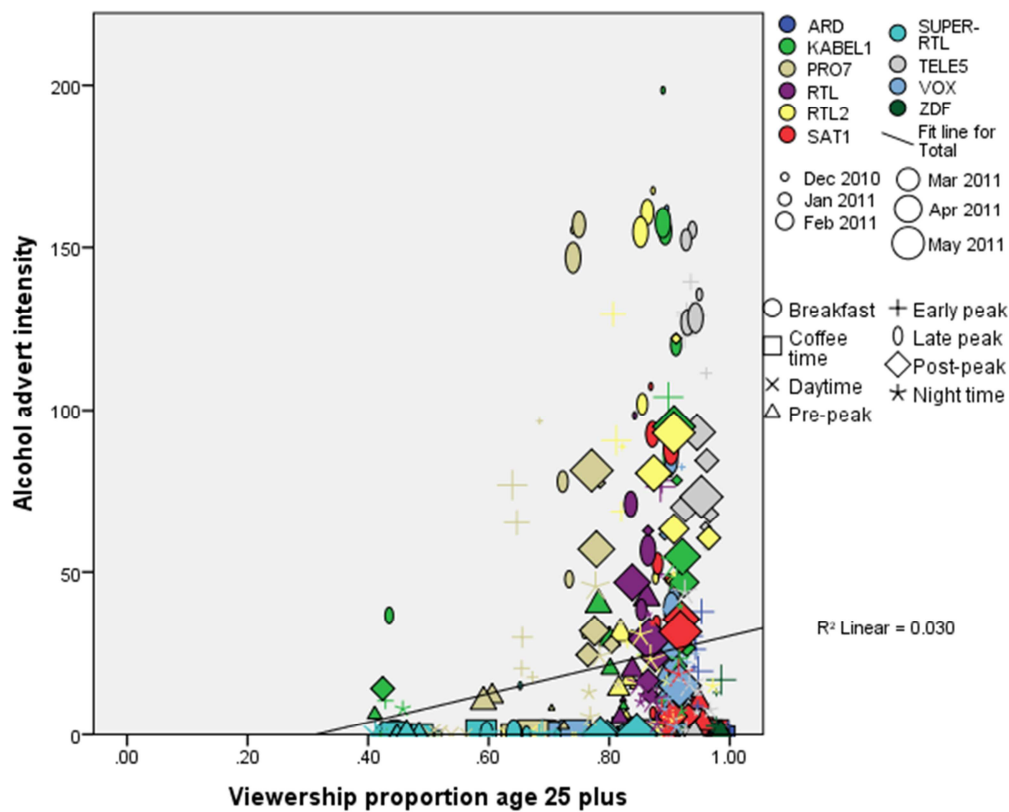


Figure 2.36: Scatterplot of advertising intensity by viewership proportion for adults (age 25+), Germany, December 2010 to May 2011

Relative levels of youth exposure to alcohol advertising

Table 2.10 shows the findings of the negative binomial regression analysis for Germany, which sought to assess whether younger people in the audience are more or less exposed to alcohol advertising than adults (ages 25+), taking into account viewership patterns. Statistically significant results are shown in bold.

Table 2.10: IRRs for exposure to alcohol adverts compared with ages 25+ years, by age group and across alcohol beverage type, Germany

	Joint significance test	Age 4–9			Age 10–15			Age 16–24		
	Chi ² , p	IRR	p-value	95% CI	IRR	p-value	95% CI	IRR	p-value	95% CI
All alcoholic beverages	79.48, p<0.01	0.96	<0.01	0.94,0.98	0.79	<0.01	0.73,0.85	1.03	0.27	0.98,1.09
Beer	75.17, p<0.01	0.95	<0.01	0.93,0.98	0.76	<0.01	0.68,0.85	1.04	0.27	0.97,1.11
Wines	9.94, p=0.02	0.94	0.01	0.89,0.98	0.98	0.80	0.86,1.13	0.97	0.62	0.88,1.08
Spirits	40.14, p<0.01	0.98	0.05	0.95,1.00	0.83	<0.01	0.77,0.89	1.02	0.55	0.96,1.07
Ready-mix	13.49, p<0.01	0.45	0.21	0.13,1.57	1.02	0.92	0.65,1.61	1.39	<0.01	1.14,1.69
Alcohol-free	0.11, p=0.99	0.99	0.76	0.95,1.04	1.01	0.82	0.92,1.12	1.00	0.94	0.94,1.06

We find that, in Germany, between December 2010 and May 2011, children aged 4–9 years were exposed to significantly fewer alcohol adverts than adults aged 25+. This effect was observed for all alcoholic beverages, as well as for beer and wine as separate categories, but the effect sizes were very small (IRRs: 0.96, 0.95 and 0.94 respectively). Unlike the UK, those aged 10–15 years were also exposed to significantly fewer alcohol advertisement than adults. This association held for all alcoholic beverages combined, alongside beer and spirits, and the reduction in exposure for this group was larger than that seen in the 4–9 age group. We observed a significantly higher exposure to adverts for ready-mix beverages for those aged 16–24, but found no statistically significant association for the remaining alcoholic beverages, or for all alcoholic beverages combined.

We carried out a set of sensitivity analyses, first comparing youth exposure with a reference group of those aged 16+ years. However, the principal findings were largely unaltered (Table 2.11). If anything, observed associations were stronger. Second, in Germany, total advertising space is regulated in that public service channels may not exceed advertising of a maximum of 20 minutes per day from Monday to Saturday before 20.00.⁴⁹ Our analysis included two public service channels, ARD and ZDF. To further explore the consequences of these restrictions we repeated our analysis with these two channels excluded. Again, this additional analysis did not alter our findings substantially (Table 2.12).

Table 2.11: Incidence rate ratios (IRRs) for exposure to alcohol adverts compared with adults (16+), by age group and across alcohol beverage type, Germany

	Joint significance test	Age 4–9			Age 10–15		
	Chi ² , p	IRR	p-value	95% CI	IRR	p-value	95% CI
All alcoholic beverages	79.03, p<0.01	0.96	<0.01	0.94,0.98	0.81	<0.01	0.77,0.86
Beer	81.7, p<0.01	0.95	<0.01	0.93,0.97	0.80	<0.01	0.75,0.85
Wines	9.53, p=0.01	0.94	0.01	0.90,0.98	0.96	0.53	0.86,1.08
Spirits	40.08, p<0.01	0.98	0.02	0.95,1.00	0.84	<0.01	0.79,0.89
Ready-mix	2.86, p=0.24	0.47	0.14	0.17,1.28	1.46	0.11	0.91,2.32
Alcohol-free	0.1, p=0.95	0.99	0.76	0.96,1.03	1.01	0.83	0.93,1.1

Table 2.12: Incidence rate ratios (IRRs) for exposure to alcohol adverts compared with adults (25+), by age group and across alcohol beverage type, ARD and ZDF excluded

Model	Overall or joint significance test	Age 4–9			Age 10–15			Age 16–24		
	Chi ² , p	IRR	p-value	95% CI	IRR	p-value	95% CI	IRR	p-value	95% CI
All alcoholic beverages	107.06, p<0.01	0.95	<0.01	0.94,0.97	0.79	<0.01	0.74,0.86	1.00	0.96	0.95,1.05
Beer	104.3, p<0.01	0.95	<0.01	0.93,0.97	0.78	<0.01	0.71,0.86	1.00	0.88	0.95,1.07
Wines	15.78, p<0.01	0.93	<0.01	0.89,0.97	0.98	0.80	0.87,1.11	0.93	0.12	0.86,1.02
Spirits	60.25, p<0.01	0.97	0.01	0.95,0.99	0.83	<0.01	0.77,0.89	0.98	0.49	0.94,1.03
Ready-mix	8.45, p=0.04	0.53	0.26	0.17,1.6	0.98	0.92	0.66,1.45	1.28	0.01	1.07,1.54
Alcohol-free	3.07, p=0.38	0.99	0.53	0.94,1.03	1.01	0.86	0.92,1.11	0.96	0.13	0.90,1.01

2.2.5 Content analysis of alcohol advertising portrayals on television

This section describes the findings of our analysis of alcohol advertising portrayals on television in the UK, the Netherlands and Germany. It draws on a sample of alcohol adverts recorded during a 2-month period in each country, selected from those channels and dayparts with the highest number of alcohol adverts viewed by young people as identified in our quantitative analyses presented in the preceding sections. We report findings separately for each of the three countries under review.

2.2.6 Alcohol advertising portrayals on television: UK

We recorded 17 hours of television footage in February and March 2012, covering the two channels ITV1 (17.30–19.59; 20.00–22.59) and Channel 4 (20.00–22.59), each on two different Fridays, at a two week interval. In the 17 hours of footage, we identified a total of 16 alcohol adverts. There was considerable repetition of adverts, such that the 16 adverts seen were repeats of only five different adverts, each from a different beer manufacturer (Table 2.13). All recorded adverts were 30 seconds in length.

As we recorded television footage on Friday evenings over 2 months only it is not possible to determine whether and how the number or content of adverts varied by month, day of the week or daypart. However, there was considerable variation in the programmes within which alcohol adverts were embedded. During the two sessions of ITV1 recording, only one alcohol advert was broadcast. This was embedded within a situation comedy (*Benidorm*). Alcohol adverts broadcast on Channel 4 were most frequent around a quiz show (*The Bank Job* or *Celebrity Bank Job*), with four adverts broadcast in each one hour programme.

Table 2.13 shows how there was variation in the extent to which adverts contained features which are considered appealing to young people.

Table 2.13: Features considered to be appealing to youth as recorded for 16 adverts broadcast on ITV1 and Channel 4 in the UK, February and March 2012

Attribute	Beer 1	Beer 2	Beer 3	Beer 4	Beer 5
Number of times advert was seen in the recorded footage	3	4	3	2	4
Humour	-	-	✓	-	-
Music	✓	✓	✓	✓	✓
Cartoons or animation	-	-	-	-	-
People characters	✓	✓	✓	✓	✓
Animal characters	-	-	-	✓	-
Celebrities	-	-	-	-	✓
Special technological effects	✓	-	-	✓	-
People behaving in a childish fashion	-	-	✓	-	-
Fantasy settings	-	-	-	✓	-
Not product-focused	-	-	✓	✓	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

All adverts included in the analyses here contained some of these features; the highest number of youth-appealing features was recorded for adverts for Beer 3 and Beer 4, and we describe these further in some detail below. It may be worth noting that several adverts reviewed featured ice and cold, highlighting the ‘refreshing’ properties of the beverage being advertised. One example featured a celebrity comparing the experience of ‘almost freezing to death in the mountains’ with the refreshment of the beverage being advertised (in this case, beer). All adverts analysed here concluded with a catch phrase that could be considered easily memorable and associated with the product. For example, the catch phrase for Beer 2 read ‘Splendidly Indian, superbly smooth’. The adverts also included a reference to the Drinkaware website, for example ‘For the facts drinkaware.co.uk’.

Box 2.2 provides an illustration for an advertisement for Beer 3. The advert can be seen to use a form of childish humour which is likely to appeal to young people. It involves two lead characters (‘Brad and Dan’) who provide advice to other young men calling them and which they dispense from their desirable situation on a beach in Australia, surrounded by young women in beachwear. The advert is not product-focused although it shows the logo of Beer 3 on the wall of the beach hut, and ‘Brad and Dan’ are seen to hold cans of Beer 3; however the drink itself does not form a part of the story.

Box 2.2: Alcohol advertising: Beer 3

The advert shows a sunny, sandy beach in Australia, where two characters (Brad and Dan) take a phone call from a man named John, from Norwich in the UK. John says he is planning to go on holiday, and asks the Australians whether he should have the hair on his back removed (‘wax his back’). Brad and Dan advise that having a hairy back is not bad and he should stay as he is, concluding that ‘remember, waxing is for cars’, with the scene switching to two young women on the beach, wearing bikinis and polishing a car. The advert then shows John once more, who now uses a hairdryer for his back. It concludes with an image of Beer 3, with the tagline, ‘[Brand name] – good call!’



Beer 3 TV advert, UK, 2 March 2012

Box 2.3 describes an advert for Beer 4. Similar to Beer 3, this advert is not focused on the product itself but builds on a fantasy setting and special technological effects, features which may be considered appealing to youth.^{40,37 41} The purpose of the advert only becomes apparent towards the end.

Box 2.3: Alcohol advertising: Beer 4

The advert shows large groups of what appear to be gladiators from different 'parties' as indicated by their carrying red or black flags, ready to go into a battle. It involves men on horses fighting, accompanied by music, which may give the impression that the scene shown is part of an epic film. Men charge down the hill carrying their flags. In what appears to be a sudden turn of events, one of the men on foot catches a flag from a horseman and dives to the ground, at which point the flag becomes a rugby ball and the battlefield turns into a rugby game. The rugby ball is then once more transformed into the froth on a glass of Beer 4. The advert concludes by showing a glass of Beer 4, with a voiceover stating: 'One nation will rise, one will be made of more. [Brand name], made of more.'



Beer 4 TV advert, UK, 16 March 2012

In addition to alcohol adverts, we also recorded alcohol sponsorship of television programmes, identifying two instances during the 17 hours of UK footage recorded. One was sponsored by a beer manufacturer, sponsoring an ITV1 comedy-drama set on a beach resort in Spain (*Benidorm*). The second was sponsored by another beer brand, involving a British comedy panel show on adverts on Channel 4 (*The Mad Bad Ad Show*). In both cases the sponsorship slots were very short, lasting either 5 or 10 seconds, but were repeated several times during the sponsored programme, eight times in the 60-minute *Benidorm* and four times in the 30-minute *The Mad Bad Ad Show*.

2.2.7 Alcohol advertising portrayals on television: The Netherlands

We recorded 15 hours of Dutch TV footage in March and April 2012, covering the two channels RTL4 (20.00–22.30, three Fridays and one Saturday) and SBS6 (20.00–22.59, one Friday and one Saturday). In the 15 hours of footage we identified a total of nine adverts. Five of these adverts were for beers, one for wine, two for cider and one for a spirit. Adverts varied in length, with the longest lasting 40 seconds.

Alcohol adverts were embedded in several types of programmes. Contests (very oriented to a Dutch audience) were commonly broadcast during the hours of footage recorded. One of the programmes was about a group of Dutch celebrities living together on an island with the aim of finding treasure. Another contest was about singing traditional Dutch songs, and a further contest tested people's knowledge about Dutch culture and values. Alcohol adverts were also shown during breaks in a comedy programme discussing the news, or

embedded in a movie ('A Fool's Gold', an adventure and romantic story about a lost treasure).

Table 2.14 summarises the key features considered appealing to youth in each of the nine adverts analysed. There was some variation in the features of each advert, with the use (or not) of special technological effects and fantasy settings to express an idea being the main difference. In all cases, reference to responsible drinking was present at some point of the advert with phrases such as '*Geen 16? Geen druppel*' ('Not 16? Don't drink a drop') or '*Geniet, maar drink met mate*' ('Drink, but drink with moderation').

The majority of the adverts concluded with a catch phrase that can be considered as easily memorable and could be associated with the product. For example, the advert for Spirit 1 used '*Español puro*' ('Purely Spanish'), while Beer 6 used '*Het klinkt al lekkerder*' ('It already sounds better'). We also noticed some common features among adverts, such as having an enjoyable social life in different settings (at home with friends, watching a Spanish dance, watching a football game, and so on). Adverts of cider and most beers made a special point of highlighting the 'refreshing' properties of the advertised drink. Adverts for beverages with higher alcohol content tended to highlight particular features of the products with the purpose of distinguishing themselves from others. For example, Spirit 1 was portrayed as an exotic Spanish drink, whereas Wine 1 was portrayed as coming from a family with long-standing experience in producing wine.

Table 2.14: Features considered appealing to youth as recorded for nine adverts broadcast on RTL4 and SBS6 in the Netherlands, February and March 2012

Attribute	Beer 6	Beer 7	Wine 1	Beer 8	Cider 1	Spirit 1
Number of times advert was seen in the recorded footage	2	2	1	1	2	1
Humour	-	-	-	-	-	-
Music	✓	✓	✓	-	✓	✓
Cartoons or animation	-	-	-	-	-	-
People characters	✓	✓	-	✓	✓	✓
Animal characters	-	-	-	-	-	-
Celebrities	-	-	-	-	-	-
Special technological effects	-	-	✓	✓	✓	✓
People behaving in a childish fashion	-	-	-	-	-	-
Fantasy settings	-	✓	-	✓	✓	-
Not product-focused	-	-	-	-	-	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

Box 2.4 illustrates a typical advert for Cider 1. It shows several of the features considered as appealing to youth. However, it also shows the origins of the cider, and presents the cider as an enjoyable, refreshing drink. The advert concludes with the catch phrase '[Brand name], sparkling cider: fresh and exciting, just like you'.

Box 2.4: Alcohol advertising: Cider 1

The advert shows two women sitting on a terrace having a drink of Cider 1. They then go out onto the balcony to watch men picking apples in an orchard. One of the men breaks into a barrel of cider and the advert cuts to show the drink flowing into bottles of Cider 1. Back in the orchard, one of the women releases a tap, letting out a jet of liquid, which sprays everyone around. The men take off their shirts and come towards the women, who toast each other and look in a way that may be considered as longingly at the men. The advert concludes with a picture of bottles and a glass of Cider 1.



Cider 1 TV advert, Netherlands, March 2012

Box 2.5 describes an advertisement for Spirit 1, a liqueur made from citrus and fruit juices. In contrast to Cider 1, this advert only shows a small number of the features considered appealing to youth. Indeed, the advert appears to focus mainly on attributes such as its uniqueness (made out of 43 different ingredients) and its 'exotic' origins (Spain).

Box 2.5: Alcohol advertising: Spirit 1

A woman starts dancing flamenco in the middle of a square (plaza) in what seems to be a Spanish town (with Spanish music in the background). During her dance, the woman uses a cape, which she moves around, simulating the movements of the cape of a bullfighter. Using special effects, it appears that the drink is running through the cape. In between movements, a picture of a glass of Spirit 1 is shown.



Spirit 1 TV advert, Netherlands, March 2012

In addition to alcohol adverts we also recorded alcohol sponsorship of programmes, identifying two instances of sponsorship during the 18 hours of Dutch footage recorded. One was for a music show on SBS6, sponsored by a beer brand (Beer 9) (*‘De vrienden van [brand name] zingen Kroonjuwelen’*; ‘The friends of [brand name] sing the jewels of the Crown’). A second involved a Dutch game show, broadcast on RTL4, sponsored by another beer brand (Beer 10). In the latter case, adverts were short, lasting around 3 seconds and just showing a picture of a glass and a bottle of beer (Figure 2.37). The advert was broadcast twice during the programme. Conversely, the sponsoring advert for Beer 9 lasted approximately 40 seconds, with the last 10 seconds of the advert announcing the opportunity to win tickets for a concert to one of the musicians at the sponsored programme. The advert appeared twice during the programme.

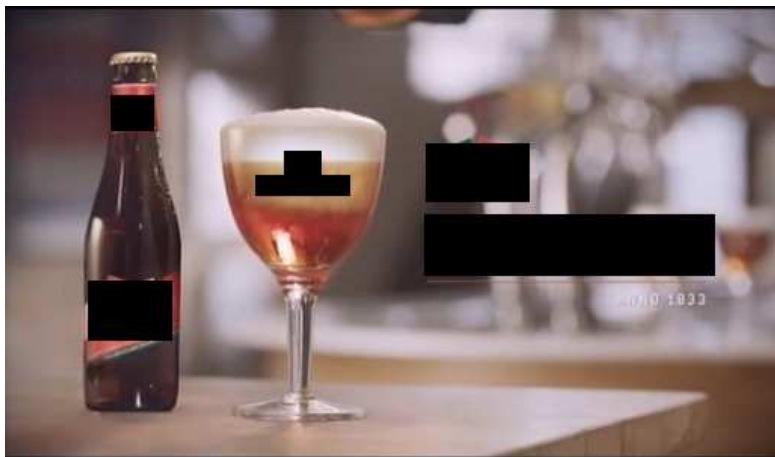


Figure 2.37: Sponsorship advert for Beer 10

2.2.8 Alcohol advertising portrayals on television: Germany

We recorded 17 hours of television footage in February and March 2012, covering the two channels ProSieben (17.30–19.59; 20.00–22.59) and RTL (20.00–22.59), each on two different Fridays, at a 2-week interval.

In the 17 hours of footage recorded from German television, a total of 27 full length adverts were broadcast, which presented distinct adverts for 13 alcohol brands. Of these brands, four were beer, eight spirits and one a non-alcoholic beer. Advert lengths varied between 10 seconds and 24 seconds. There were also 25 alcohol brand ‘sponsorships’ of films or television programmes, which related to six individual products. These were either sponsorship announcements showing the brand and announcing the sponsored film, or shortened versions of a full advertisement, with a modified voiceover to highlight the sponsorship of the film or programme.

As we recorded television footage on Friday evenings in February and March it is not possible to determine whether and how the number or content of adverts varied by month, day of the week or by daypart. Alcohol adverts reviewed here were embedded in different types of programmes including comedy (eg *The Simpsons*), movie (eg *Star Wars*), quiz shows, sports programmes and music shows. As noted above, several of the programmes

were sponsored by alcohol brands, with for example a beer brand (Beer 14) sponsoring two movies. While sponsorship slots were shorter than full length adverts, the frequency with which they were shown tended to be higher; for example, there were eight sponsorship slots for one beer brand (Beer 14) relating to the movie *Star Wars* alone.

Table 2.15 summarises the key features considered appealing to youth, for each of the 13 full length adverts analysed.

Table 2.15: Features considered appealing to youth as recorded for 13 adverts broadcast on ProSieben and RTL in Germany, February and March 2012

Attribute	Spirit 2	Spirit 3	Beer 11	Spirit 4	Spirit 5	Spirit 6	Beer 12 v1	Beer 12 v2	Beer 13	Non-alcoholic 1	Spirit 7	Spirit 8	Spirit 9
Number of times advert was seen in the recorded footage	1	1	2	1	2	1	5	5	4	2	1	1	1
Humour	-	-	-	-	-	-	-	-	-	-	✓	-	✓
Music	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Cartoons or animation	-	-	-	-	-	-	-	-	-	-	-	-	-
People characters	✓	✓	✓	✓	✓	✓	✓	✓	-	-	✓	✓	✓
Animal characters	-	-	-	-	-	✓	-	-	-	-	-	-	-
Celebrities	-	-	-	-	-	-	-	-	-	-	-	-	-
Special technological effects	-	-	✓	-	-	-	-	-	✓	-	-	✓	-
People behaving in a childish fashion	-	-	-	-	-	-	-	-	-	-	-	-	-
Fantasy settings	-	-	-	-	-	✓	-	-	-	-	-	-	-
Not product-focused	-	-	-	-	-	-	-	-	-	-	✓	-	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

While almost all adverts featured music and people characters, other features were less common, with humour and special technological effects each featuring in two adverts, and fantasy settings and non-product focus in one advert each. Adverts analysed here did not use cartoons or animation, celebrities and people behaving in a childish fashion. Several of the adverts focused on the quality of the beverage being advertised and the processes which led to its creation. In particular, this was noted in the adverts for the Beer 11 and Beer 13. In Germany most adverts did not contain any message about responsible drinking,

although two adverts included in small type the phrase 'Enjoy responsibly', with two further showing the website address 'genussmitverantwortung.de' a German website about responsible drinking.

To place the assessment provided in Table 2.15 in context, we here provide further detail on two adverts which used the highest number of features deemed to appeal to youth. For example, Box 2.6 describes an advertisement for Spirit 7, a herbal liqueur originating from Italy, typically used as a digestive. Here, the product itself is not part of the storyline; the purpose of the advert only becomes apparent towards the end.

Box 2.6: Alcohol advertising: Spirit 7

The advert showed young women in an apartment who, from their window, spot a young man across the road dancing in front of his mirror wearing only his underpants. They wave and salute him and cheer him on, and he continues dancing, now facing them and making the most of the situation. The scene appears to be cheerful and happy. It is set in an Italian city and the slogan says 'live in the moment'. The scene then switches to show a bartender pouring two glasses of the drink with many people out apparently enjoying themselves at the bar.



Spirit 7 TV advert, Germany, March 2012

Box 2.7 illustrates a typical advert for Spirit 6, a herbal digestive.

Box 2.7: Alcohol advertising: Spirit 6

The advert starts by showing young people in a city street walking towards a building while accompanied by a moose. Having the animal walking alongside does seem to be 'normal', with the group not paying any attention to it. When they enter the building, they board a lift and press the button, with the scene focusing on one young man holding a bottle of the spirit. As the doors of the lift open they enter a large rooftop garden, joining a party with more young people who are dancing and hugging. People are shown pouring the drink for each other and drinking it. The advert concludes by showing the logo and name of the brand. No word is spoken; instead, the advert is accompanied by dance music throughout.



Spirit 6 TV advert, Germany, March 2012

2.2.9 Alcohol advertising policies and advert compliance

In this section we report on our analysis of the extent to which television alcohol adverts as assessed in the preceding section complied with the (self-)regulatory codes for alcohol advertising. We considered the main (self-)regulatory codes in place in each of the three countries, considering national-level stipulations as well as codes implemented by producers of alcoholic beverages and television broadcasting channels. A brief overview of the main statutory and self-regulatory stipulations of alcohol advertising in the UK, the Netherlands and Germany is presented in Appendix B.

2.2.10 Alcohol advertising policies and advert compliance: UK

In the UK, national-level regulation of advertising includes the UK Code of Broadcast Advertising (BCAP Code), enforced by the Broadcast Committee of Advertising Practice (BCAP).⁴⁴ The Committee of Advertising Practice (CAP) is responsible for the non-broadcast code.²⁹ In addition, the Portman Group, an industry group of alcohol producers, has developed a voluntary code of conduct, the Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks.⁵⁰

We assessed the extent to which the adverts of the five alcohol brands examined in Section 2.2.6 adhered to the UK Code of Broadcast Advertising (BCAP) code and to the Portman Code. We here provide a brief summary of the main observations. A detailed overview of our analyses is presented in Appendix C, Table 1.

We find that most of the stipulations set out by the BCAP code were not contravened in any of the UK advertisements analysed here. This includes stipulations that advertisements must not encourage irresponsible drinking; imply that alcohol can improve an individual's popularity, confidence or social success; link alcohol to illicit drugs; depict under-age drinking; or emphasise the alcoholic strength of a given drink. However, there were instances where advertisements included in our sample may be considered as having violated other stipulations of the BCAP code. These include those stating that advertisements must not:

- link alcohol with toughness, aggression or irresponsible behaviour (n=2)

- link alcohol with sexual success or seduction or imply that alcohol can enhance attractiveness (n=3)
- imply that alcohol has therapeutic qualities (n=1) (Appendix C).

However, in all these cases, adverts did not make a direct link to the actual consumption of alcohol.

There was more clear-cut evidence for violation of two core stipulations of the BCAP code, however: that alcohol advertisements must not ‘be likely to appeal strongly to people under 18, especially by reflecting or being associated with youth culture or showing adolescent or juvenile behaviour’ (BCAP 19.15.1) and ‘include a person or character whose example is likely to be followed by those aged under 18 years or who has a strong appeal to those aged under 18’ (BCAP 19.15.2).⁴⁴

As we have seen in Section 2.2.6, there are many elements to (alcohol) advertising which are considered to appeal to young people and therefore most of the adverts assessed here may be considered to contravene the BCAP code 19.15.1 and 19.15.2. For example, the Beer 3 advert, portrayed in Box 2.2 (page 51), includes two characters (Brad and Dan) who might be considered to be role models and therefore have a strong appeal to those aged under 18, thus contravening BCAP 19.15.2. However, the BCAP code does not define the term ‘appeal’ further and it is therefore difficult to judge whether any of the elements identified here as appealing to youth would hold up under BCAP.

We also assessed alcohol portrayals in the sample of advertisements analysed in this study against the alcohol industry’s Portman Code.⁵⁰ A detailed overview of our findings is presented in Appendix C. In brief, in line with our observations of advert compliance to the BCAP code, we find potential violations of the Portman Code in relation to the display of instances that may ‘suggest any association with bravado, or with violent, aggressive, dangerous or antisocial behaviour’ (3.2 (b)) (n=2); ‘suggest any association with sexual success’ (3.2 (d)) (n=1); or ‘suggest that consumption of the drink can lead to social success or popularity’ (3.2 (e)) (n=1). Importantly, and again similar to our observations of advert compliance to the BCAP code, Portman Code 3.2 (h) stipulates that marketing of a drink should not in any direct or indirect way ‘have a particular appeal to under 18s (in the case of sponsorship, those under 18 years of age should not comprise more than 25 per cent of the participants, audience or spectators)’.⁵⁰ Again, the definition of what constitutes ‘particular appeal’ remains unclear and if we apply our ratings as illustrated in Section 2.2.6 we might consider all adverts analysed here as violating the Portman Code on this particular stipulation.

We also examined the codes of the two television channels that hosted the adverts analysed here (Channel 4 and ITV1) and the extent to which adverts broadcast adhered to their own policies. However, we were unable to identify a detailed alcohol marketing code specific to either channel. Instead, both state that they require adverts to adhere to the BCAP code, and they use Clearcast, an advertising services company, to review scripts and storyboards for television adverts before they are filmed and provide pre-transmission clearance of finished adverts.⁵¹

In a third step, we examined policies implemented by producers of the alcohol brands analysed in Section 2.2.6 themselves in relation to alcohol marketing. Table 2.16 provides

an overview of key characteristics of companies' 'responsible drinking policies' that also include stipulations for marketing.

Table 2.16: Responsible drinking policies of UK alcohol brands

Brand	Producer	Internal code for marketing communications	Promoting awareness among consumers	Supporting employees to drink responsibly	Working through partnerships
Coors Light Cobra Carling Chrome	Molson Coors UK	Molson Coors Alcohol Responsibility Policy	Support for Drinkaware campaigns	All employees are required to take alcohol responsibility training	Partnerships with: International Center for Alcohol Policies, Global Alcohol Producers Group, Global Brewers Forum, Drinkaware
Foster's	Heineken UK	Heineken Responsible Marketing Policy	Enjoy Heineken Responsibly	Cool @ Work programme	
Guinness	Diageo	Diageo Marketing Code Digital Code of Practice	DRINKiQ.com, aimed at raising awareness and sharing information	DRINKiQ training course for employees	Partnerships with International Center for Alcohol Policies and Drinkaware

SOURCE: ⁵²⁻⁵⁶

Of particular interest to this study are the internal codes for marketing communications for each company. These are available from Molson Coors UK, Heineken UK and Diageo. A summary table of alcohol producers' own responsible marketing policies is found in Appendix D. These marketing policies cover similar topics to those found in national regulation or self-regulation. Therefore, our previous assessment of national regulations also applies here. Of particular interest to us are the rules concerning young people. In all cases alcohol producers' marketing policies refer to targeting individuals above the legal drinking age. For example the Heineken policy states that marketers should 'avoid communication that is more likely to appeal to under 18s than adults' including the use of 'endorsements or promotions by personalities, heroes, icons or motifs which predominantly appeal to under 18s'.

As we have already suggested, the characters Brad and Dan, who feature in adverts for one of the examined beer brands, could be considered to fit into this category.

2.2.11 Alcohol advertising policies and advert compliance: The Netherlands

In the Netherlands, there are three national-level policies on alcohol marketing and advertising: the Alcohol Licensing and Catering Act (Drank- en Horecawet), the Guideline for Promotions by the Catering Industry (Richtlijn voor Horeca promoties), and the Alcohol Code for Alcoholic Beverages (Reclamecode for Alcoholhoudende dranken; RvA). Of these, the Alcohol Code for Alcoholic Beverages may be seen as the most relevant as it regulates the content of alcohol marketing and advertising. However, we first briefly describe the other two national regulations on alcohol marketing and advertising.

The Alcohol Licensing and Catering Act (Drank- en Horecawet) is a statutory law regulating the sales of alcohol beverages. While it provides the Minister of Health, Welfare and Sport with the possibility of regulating alcohol advertising, so far it only includes stipulations on display of alcoholic beverages in grocery stores. The Guideline for Promotions by the Catering Industry (Richtlijn voor Horeca promoties) is a non-statutory, self-regulated code, which mainly controls the alcohol promotions offered in the catering industry, basically setting the norms regulating promotional discounts.

The Advertising Code for Alcoholic Beverages (RvA) is non-statutory and has been developed by the Association for the Responsible Consumption of Alcohol (Stichting Verantwoord Alcoholgebruik; STIVA), which is mainly financed by Dutch producers and importers of beer, wine and distilled beverages.

We assessed the extent to which the six adverts examined in Section 2.2.7 adhered to the self-regulatory code (RvA) by STIVA and provide a brief summary of the main observations below. A detailed overview of our analyses is presented in Appendix B, Table 2.

We find that, in general, the sample of adverts on Dutch televisions as analysed here seem to comply with the stipulations set out by STIVA. However, there were instances where advertisements might be considered to have violated them. For example, article 8 stipulates that ‘advertising of alcoholic beverages may not arouse the impression that consumption of an alcoholic beverage enhances social or sexual success’.⁵⁷ We identified four instances in which advertisements portray people in a harmonious and fun social environment, although they do not explicitly state that drinking alcohol enhances success.

We also assessed the codes of the two television channels that had broadcast the adverts analysed in this study (RTL4 and SBS6). However, in the Netherlands, channel broadcasters do not have voluntary or compulsory rules about television advertising for alcohol beverages.

In a third step, we examined policies implemented by producers of alcohol brands analysed in Section 2.2.7. Table 2.17 provides an overview of the types of initiatives adopted by different alcohol brands to promote responsible drinking. Where indicated (‘✓’), the brand websites report that they are active in that area. We have not here validated whether these activities occur in practice.

Table 2.17: Responsible drinking policies of Dutch alcohol brands

	Adherence to STIVA guidelines	Internal code for marketing communications	Promoting awareness among consumers	Supporting employees to drink responsibly	Working through partnerships
Grolsch	✓	Policy on Commercial Communication	National media campaigns	n/a	Support regional projects to increase awareness about the risks of alcohol consumption
Heineken	✓	Responsible Commercial Communication	National media campaigns	Cool@Work Programme	Member of the European Alcohol Forum, partnered with Addaction in the UK
Hardy's	✓	n/a	n/a	n/a	n/a
Jupiler	✓	n/a	n/a	n/a	n/a
Jillz	✓	n/a	n/a	n/a	n/a
Licor 43	✓	n/a	n/a	n/a	n/a

SOURCE: ^{58, 65}

NOTE: n/a not available/documented

We were interested in whether alcohol producers comply with their own policies on advertising. The Heineken Responsible Commercial Communication policy states that commercial communications should never target minors and must only promote beer through media, programmes and events where at least 70 per cent of the audience are reasonably expected to be people older than 18 or above the legal purchase age (when the legal purchase age is higher than 18 years⁵³). While we do not have the data to assess the audience of our recorded adverts, the stated commitment not to target minors is similar to that stipulated in national regulations as discussed above. A detailed overview of the Heineken International Rules on Responsible Commercial Communication is provided in Appendix D. The Grolsch Policy on Commercial Communication was not publicly available, and it was therefore not possible to assess our recorded adverts against this policy.

2.2.12 Alcohol advertising policies and advert compliance: Germany

In Germany, there are three national-level policies that specifically refer to alcohol marketing and advertising. These include the statutory Protection of Young Persons Act ('Jugendschutzgesetz'), the Interstate Treaty on the Protection of Human Dignity and the Protection of Minors in Broadcasting ('Jugendmedienschutz-Staatsvertrag') and the voluntary Code of Conduct on Commercial Communication for Alcoholic Beverages ('Verhaltensregeln des Deutschen Werberats über die kommerzielle Kommunikation für alkoholhaltige Getränke') (hereafter referred to as the 'Code of Conduct').⁶⁶

The German Protection of Young Persons Act contains clauses that restrict broadcasting time of adverts in movies and media, but does not address their content.⁶⁷ The Interstate Treaty on the Protection of Human Dignity and the Protection of Minors in Broadcasting⁶⁸ includes a general statement to safeguard children from direct alcohol advertisements ('Advertising for alcoholic beverages shall not be aimed at children or

adolescents nor specifically appeal to children and adolescents through its presentation, nor show them consuming alcohol' (Article 6 (5))). The voluntary Code of Conduct issued by the German Advertising Council ('Deutscher Werberat'), a self-regulatory body of the German Advertising Federation, is responsible for the complaint and sanctioning system.⁶⁹

We assessed the extent to which the 13 adverts examined in Section 2.2.8 adhered to the self-regulatory Code of Conduct by the Deutscher Werberat. We here provide a brief summary of the main observations. A detailed overview of our analyses is presented in Appendix C, Table 3.

Overall, we find that alcohol adverts analysed in this study tended generally to adhere to the stipulations set out by the Code of Conduct. The Code distinguishes nine categories: abusive consumption; minors; the use of sportspersons; general safety; health claims; alcohol content; anxiety, disinhibition and conflict; performance; and age of depicted individuals. However, there were instances where advertisements included in our sample might be considered as having violated these. For example, we identified four advertisements that could be interpreted as giving the impression that 'consumption of alcoholic beverages promotes social or sexual success' (Code of Conduct 8.2) through association by the setting, storyline, or context of the advertisement. Other instances included potential violation of Code of Conduct 1.4 ('shall promote responsible consumption of alcohol consumption') (n=1); Code 4.1 ('shall not show any person drinking or promoting drinking while driving a vehicle') (n=1); Code 4.3 ('shall not show consumption of alcoholic beverages in situations constituting a breach of safety rules') (n=1); and Code 7.2 ('shall not make any claim relating to the elimination or relief of anxiety') (n=1). In all but one case, adverts did not make a direct link to the actual consumption of alcohol.

Similar to what we observed for the UK, if we set alcohol adverts against the Interstate Treaty on the Protection of Human Dignity and the Protection of Minors in Broadcasting, we might consider all adverts analysed here to violate its principal stipulation that 'advertising for alcoholic beverages shall not [...] specifically appeal to children and adolescents'.⁶⁸ We have shown in Section 2.2.8 that all adverts analysed here contain elements that have been identified in the literature as appealing to youth. However, the Treaty does not define the term 'appeal' further and it is therefore difficult to judge whether any of the elements identified here as appealing to youth would hold up under the Treaty.

One issue that was not thoroughly resolved through our research was the question of whether there were national regulations in place in Germany that prohibit advertising during children's programming dayparts. The self-regulatory Code of Conduct on Commercial Communication for Alcoholic Beverages⁴⁵ states, 'Commercial communication for alcoholic beverages shall not be conveyed by media the majority of whose editorial content addresses minors.' However it is unclear whether this rule also prohibits the transmission of advertising between programmes.

We also assessed the codes of the two television channels that had broadcast the adverts analysed in this study (RTL and ProSieben). RTL is part of the 'RTL Mediengruppe', which provides a statement of 'responsibility for the protection of youth' but with little detailed information on how its stipulations are implemented.⁷⁰ Of the channels in this

group, Super RTL provides more specific information on advertising, noting that it follows a range of rules and that its adherence to them is being monitored by its youth protection officer.⁷¹ The rules include that advertising for alcoholic beverages must not specifically be targeted at minors and must not portray minors consuming alcohol; also, advertising that includes scenes of a violent and 'obscene' nature is prohibited. ProSieben is part of SevenOne Media (including SAT1, Kabel 1 and ProSieben). Similar to other media groups, it employs a youth protection officer responsible for ensuring adherence to regulatory requirements,⁷² but we were unable to identify any further information relating to alcohol advertising specifically.

In a further step, we examined policies implemented by the producers of the alcohol brands analysed in Section 2.2.8. In most cases these policies formed part of a wider corporate social responsibility policy or reporting of the company, while we were unable to identify details on regulations on advertising specifically. In some instances, the group or manufacturer mentioned the implication of company norms and standards on advertising to minors.

Table 2.18 summarises alcohol brand responsible drinking policies in Germany. We relied on information provided on the individual company's public websites. As it was beyond the scope of this study to gather information from internal company documents or key informants, the level of detail obtained from the various companies varied. A detailed overview of company policies is provided in Appendix D.

Table 2.18: Responsible drinking policies of German alcohol brands

Brand	Producer	Internal code for marketing communications	Promoting awareness among consumers	Supporting employees to drink responsibly	Working through partnerships
Absolut Vodka Havana Club Ramazotti	Pernod Ricard Group	Self-regulation through an Internal Approval Panel for Advertising In 2007, the company adopted a code on commercial communications (see Appendix D)	Targeted communication, prevention and education initiatives	Employees expected to 'set the example by being the first to adopt responsible behaviours regarding alcohol'	Partnerships with Alcohol and Health Forum, International Center for Alcohol Policies (ICAP) and Global Alcohol Producers Group (GAP Group) Member of: European Forum for responsible drinking
Bitburger Koenig Pilsener	Bitburger Brewery Group	Bitburger Brewery Group Code, not published	Guidelines for drink/drive, not serving alcohol to minors, and general social responsibility available on their website for those who sell the product	n/a	n/a
Baileys	Diageo	Diageo Marketing Code Digital Code of Practice and DRINKiQ	DRINKiQ.com, aimed at raising awareness and sharing information	DRINKiQ training course for employees	Partnerships with: ICAP, Drinkaware

Brand	Producer	Internal code for marketing communications	Promoting awareness among consumers	Supporting employees to drink responsibly	Working through partnerships
Glengrant SKYY Vodka	Campari Group	Gruppo Campari Code of Ethics	Gruppo Campari Code of Ethics	Gruppo Campari Code of Ethics	-
Jaegemeister	Mast-Jägermeister SE	n/a	n/a	n/a	n/a
Krombacher	Krombacher Brauerei	Internal guidelines, not published	n/a	n/a	Main site refers to working in partnership with other agencies for social responsibility; details not provided
Verpoorten	Verpoorten GmbH & Co. KG	n/a	n/a	n/a	Supports 'don't drink and drive' campaign

SOURCE: 73-87

NOTE: n/a not available/documented

Many of the company-specific policies shown in Table 2.18 are internal guidelines not publicly available. It was therefore not possible to assess the recorded adverts against these policies consistently. Marketing codes which were available publicly include the Pernod Ricard Code, Campari Group Code, and Diageo Marketing Code (summarised in Appendix D). Krombacher makes a general reference on its website on regulations of content and timing of advertisements.

Keeping the limited information we were able to access in mind, it appears that, overall, the German advertisements analysed in this study adhered to their own codes of conduct. For example, Pernod Ricard's statement on advertising to minors notes that adverts should 'not use objects, images, styles, symbols, colors, music and characters (either real or fictitious, including cartoon figures or celebrities such as sporting heroes) of primary appeal to children or adolescents'.⁷⁴ However, and similar to what we have noted above, a precise definition of what constitutes marketing of 'primary appeal to children or adolescents' is not provided. Thus, based on our analyses of alcohol portrayals of adverts by this producer, as described in Section 2.2.8, adverts could be considered to have violated the company's code, since we identified elements of them that appeal to young people, such as 'humour' and 'people having fun'.

Similarly, the code for Diageo highlights that marketing should 'not use any image, symbol, language, gesture, music, cartoon character, person, sporting/entertainment celebrity, hero, or promotional prize or gift that appeals primarily to those younger than legal purchase age (LPA)' and, further, that 'marketing must never be designed or constructed in a way that appeals primarily to people younger than LPA'.⁸⁸ Again, what constitutes marketing that appeals to people younger than the LPA remains unspecified and it is therefore difficult to pass certain judgement on the extent to which any product's advertisement analysed in this study may have violated the producer's own code.

2.2.13 Case study: alcohol advertising during televised football matches

This section reports on a small case study, which sought to provide insights into exposure to alcohol advertising from a range of sources, in addition to advertisements, during televised football matches. It draws on observations by four viewers of 11 football matches that were broadcast on UK television during March and April 2012. Nine took place in England, one in Italy and one in Spain.

Table 2.19 summarises our observations from the 11 matches. Observations were recorded both for the coverage of the match itself and for additional studio analysis (eg commentary, interviews, match highlights), which includes pre-match, post-match and half-time analysis. Our findings show that all games featured pitchside advertising of alcohol adverts. In addition we found several instances of alcohol brand sponsorship of the team kit and one case of projection of alcohol branding onto the pitch.

Table 2.19: Frequency of different forms of alcohol marketing observed during 11 football matches broadcast in the UK, March and April 2012

Match number	Sponsorship on team kit	Pitchside advertising	Scoreboard advertising	Projection of branding onto pitch	Verbal mentions of alcohol brands
Studio analysis					
1	-	15	-	-	-
2	-	1	-	-	-
3	-	-	-	-	-
4	10	2	-	-	-
5	-	4	-	1	-
6	-	1	-	-	-
7	-	2	-	-	-
8	-	2	-	-	-
9	-	2	-	-	-
10	-	1	-	-	-
11	-	1	-	-	-
Match					
1	-	73	-	-	-
2	-	32	-	-	-
3	-	5	-	-	-
4	90 (estimate)	49	-	-	-
5	-	57	-	-	-
6	-	12	-	-	-
7	-	23	-	-	-
8	-	14	-	-	-
9	-	28	-	-	-
10	-	18	-	-	-
11	-	23	-	-	-

NOTE: '-' denotes that item is not present

Pitchside advertising was displayed on static or electronic advertising boards, with the latter frequently changing advert displays throughout each game. The number of times pitchside advertising was observed ranged from 5 to 73 times across the 11 matches. In some cases, pitchside advertising was also visible during the studio analysis, with a maximum of 15 instances of pitchside advertising observed during the studio analysis.

Table 2.20 shows the range of brands represented by pitchside advertising. Almost all advertising was for beer, mostly Beer 16.

Table 2.20: Brands featured on pitchside advertising observed during 11 football matches broadcast in the UK, March and April 2012

Match number	Pitchside advertising					
	Beer 7	Beer 15	Beer 16	Beer 17	Beer 18	Cider 2
1	✓	-	-	-	-	-
2	✓	-	-	-	-	-
3	-	✓	-	-	-	-
4	-	-	✓	-	-	✓
5	-	-	✓	-	-	✓
6	-	-	✓	-	-	-
7	-	-	✓	✓	-	-
8	-	-	✓	-	-	-
9	-	-	✓	-	✓	-
10	-	-	✓	-	-	-
11	-	-	✓	-	-	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

As shown in Table 2.19, other forms of advertising observed included sponsorship on the team kit. In one instance (match number 4), the brand logo on the team kit could be seen at least an average of once every minute throughout the match. The logo on the team kit was also recorded ten times during the studio analysis. However, sponsorship on team kits was not observed for the other matches.

Sponsorship of matches resulted in many instances in the sponsor's logo appearing during the studio analysis. In one case, post-match interviews were held against a background screen that displayed the logos of all sponsors of the team. In other cases, in which one beer manufacturer had sponsored the competition of which the relevant match was part, the logo of the brand was displayed on the cup ribbons, when replays were shown, and frequently on an electronic screen at the football stadium.

In addition to alcohol marketing recorded through the match coverage and the match itself, all football games viewed showed between one and three alcohol adverts in the advertising breaks during the game and match coverage. The alcohol brands advertised in the advertising breaks tended to be different from those shown during the football matches. However, the same alcohol brands tended to advertise during many different matches (Table 2.21).

Table 2.21: Frequency of alcohol adverts shown during football matches and associated studio analysis observed during 11 football matches broadcast in the UK, March and April 2012

Match number	Alcohol adverts shown during the match and studio analysis						
	Beer 2	Beer 5	Beer 16	Beer 19	Beer 20	Cider 3	Spirit 10
1	-	-	✓	-	-	✓	✓
2	✓	-	-	-	-	-	-
3	-	-	-	-	-	✓	-
4	✓	-	-	-	-	-	-
5	-	✓	✓	-	-	-	-
6	-	✓	-	✓	-	-	-
7	-	✓	-	✓	✓	-	-
8	-	✓	-	✓	-	-	-
9	-	✓	-	✓	✓	-	-
10	-	✓	-	✓	-	-	-
11	-	✓	-	✓	-	-	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

2.3 Discussion

2.3.1 Quantifying the exposure to alcohol advertising on television

The analyses presented here provide important new insights into the exposure of young people to alcohol advertising in three European countries. We show how compared with adults, youth in the UK (ages 10–15 years) and the Netherlands (13–19 years) were significantly more exposed to alcohol advertising than would have been expected given their viewing patterns of the ten most viewed channels in each country. Conversely, in both countries, very young people were significantly less exposed to alcohol advertising than adults.

Although the above findings are for advert incidence across all channels, months and dayparts, it is possible to consider the origin of the higher exposure among young viewers aged 10–15 years in the UK and 13–19 years in the Netherlands. Thus, our descriptive analysis of viewership and alcohol advertising highlighted several instances where viewership of young people was particularly high. In the UK, for channel E4, those under the age of 25 accounted for about 40 per cent of the viewership, which is substantially higher than the share of this age group in the general population (27 per cent). Similarly, in Germany, we found that over 35 per cent of the viewership of the channel SuperRTL were under the age of 15, compared with just 11 per cent of the general population who were under age 15. However, in this particular case, there was relatively little alcohol advertising, although the majority of the advertising was for alcohol-free beverages.

The overall pattern of exposure, as demonstrated by incidence rate ratios (IRRs), varied by alcoholic beverage. Thus, in the UK, associations were particularly strong for ready-mix drinks, which include alcopops. Here, we found young people aged 10–15 years to be exposed to 51 per cent more alcohol advertising than those aged 25 years and older (IRR

1.51; 95% Confidence Interval CI 1.27, 1.78). This association was even stronger when we compared this group with those aged 16 years and older. Effect sizes were somewhat smaller for beer, cider, wines and spirits, but in all cases statistically significant. In the Netherlands, among young people aged 13–19 years, associations were found to be greatest for wines (IRR 1.63, 95% CI 1.08, 2.46) and spirits (IRR 1.45, 95% CI 1.17, 1.82), when compared with adults aged 20 years and older. Dutch data analysed here did not provide a separate category for ready-mix drinks and we cannot therefore say with certainty whether observed patterns reflect differences in drinking preferences, which, by implication, will influence advertising behaviour by producers of alcoholic beverages.

Our observation that very young viewers were significantly less likely to be exposed to alcohol advertising suggests that exposure at a young age is not inevitable. However, our finding that adolescents and teens in the UK may be disproportionately exposed to advertising for products such as alcopops that have been found to be most popular among young drinkers⁸⁹ gives cause for concern, with existing evidence showing that exposure to alcohol advertising increases the likelihood that adolescents will start to drink alcohol at an early age.³

Our findings for the UK are similar to those observed in one recent study in the US.¹⁸ Also using commercial data on viewership and alcohol advertising, that study found a significant association between alcohol advertising and youth (ages 12–20 years) viewership, with associations greatest for alcopops, spirits and beer. In the Netherlands, the strongest increase in advertising exposure in the 13–19 age group was for wines, with an IRR of 1.63 (95% CI 1.08, 2.46), while in the UK, this association was 1.11 (95% CI 1.04, 1.20) for those aged 10–15 compared with those aged 16 years and older. Conversely, the US study found a negative association for wine, which was statistically significant. Data are not easily comparable though and, as indicated earlier, it is unclear to what extent these differences may reflect differences in drinking preferences in the three countries. Importantly, and in line with our findings, the US study found very young viewers (2–11 years) to be significantly less likely to be exposed to alcohol advertising on US cable television.

In contrast to our findings for the UK and the Netherlands, our analysis for Germany did not find evidence of young people having higher exposure to alcohol advertising than adults. Conversely, in this age group, exposure to beer and spirits advertising was significantly lower than would have been expected given their viewership patterns, an observation not made for either the UK or the Netherlands. However, similar to the other two countries, very young viewers (ages 4–9 years) were significantly less likely to be exposed to alcohol advertising, although effect sizes were small (IRRs 0.94 for wines to 0.98 for spirits).

There are a variety of reasons why our findings for Germany may differ from those for the UK and the Netherlands. One possible explanation is that because of the restrictions on advertising on German television, alcohol producers may be very selective about the placing of their adverts. As noted earlier, in Germany, advertising on public channels is prohibited on Sundays and public holidays and in certain evening dayparts.⁴⁹ Furthermore, total advertising is limited to 20 minutes per day; on commercial channels, advertising is limited to 12 minutes per hour. We assessed the potential impact of these advertising

regulations by excluding the two public service channels included in our data (ARD and ZDF) from our analysis. However, as shown in Section 2.2.4 (Table 2.12), this did not alter our principal findings.

An alternative explanation may be that the way in which young people watch television in Germany is intrinsically different from the way young people in the UK and the Netherlands watch it. For example, we found high youth viewership (ages 4–9 and 10–15 years) for two specific channels (Super RTL, Kabel1) that offer specific children's programming. It may therefore be easier for advertisers to avoid placing adverts during those times and on those channels which a high proportion of young people will watch. In the Netherlands, children's programmes are shown on NL1, 2 and 3; however this is limited to early dayparts only. We have excluded these from our analysis because alcohol advertising on Dutch television is banned from 6.00 to 21.00 hours. In the UK, digital children's channels are operated by the public service channel BBC, which was again excluded from our analysis. It is therefore difficult, on the basis of the data analysed here, to assess the validity of this hypothesis given the differences in the national frameworks influencing programming and advertising behaviours.

In this context it is worth highlighting the comparatively high level of advertising of 'alcohol-free alcoholic beverages' seen in Germany and the Netherlands. In the Netherlands, 11 per cent of all 'alcohol' advertising was for alcohol-free beer and wine, and in Germany, 18 per cent of all 'alcohol' advertising was for alcohol-free beer. Our UK data did not contain data on alcohol-free beverage advertising so we were unable to compare across all three countries. In the Netherlands, advertising of alcohol-free beverages occurred during all dayparts, including those in which alcohol advertising is banned, while in Germany a greater proportion of alcohol-free advertising occurred in earlier dayparts and during children's programming (SuperRTL). This suggests that in these countries alcohol-free products may be advertised as an alternative to alcohol advertising at times when alcohol advertising is restricted or not deemed appropriate.

In this study we have used incidence rate ratios (IRRs) to examine whether advert incidence is associated with youth viewership, after controlling for adult viewership. If advert placement is sensitive only to young adult (age 16–24) viewership, for instance, then placement should appear random for youth viewership after controlling for young adult viewership. The level of exposure may be high, but it would not be higher than would be expected given advertisers' attempts to reach young adult audiences. However, we found significantly higher exposure among youth than would have been expected given their viewership pattern. This emphasises the importance for policy makers to consider ways to reduce exposure of young people to alcohol adverts or their adverse impacts.

The analyses we present here sought to quantify youth exposure to alcohol advertising on television in three European countries. They drew on commercially available data capturing all alcohol advertising broadcast on the top ten most viewed television channels in the UK, Germany and the Netherlands, covering a 6-month time period. Because of the costs associated with obtaining the data, we were unable to analyse a wider range of television channels in the countries under review. However, we included those ten channels with the highest viewership and therefore feel reasonably confident that we have captured a fairly robust pattern on alcohol advertising patterns in the three countries. It

would have been desirable to assess a longer time period, ideally 12 months worth of data, to fully capture seasonal variation in viewership and advertising patterns. At the same time, we believe we have captured a fairly robust indication of seasonality by selecting months with high levels of viewership and advertising (including long stretches of public holidays and the festive season during December, and the football season during April and May) within the 6-month period, alongside ‘quieter’ months (January and February).

A key challenge to our analyses was the nature of the raw data, with differences in age ranges and definitions of dayparts, which limited our ability to directly compare our findings across countries, in particular the UK and Germany on the one hand with the Netherlands on the other. What appears to be a stronger effect in terms of incidence rate ratios for young people compared with adults in the Netherlands than in the UK may simply be a result of the differences in available age categories or other similar factors. As noted earlier, the nature of the data did not allow us to use age 18 and older as the ‘adult’ reference group in our analyses. This would have been preferable given that this is the legal purchasing or selling age for alcohol in most, although not all, European countries. However, we have been able to approximate this cut-off by using age 16 years and older in the UK and Germany and age 20 years and older in the Netherlands. It is important to reiterate that the age ranges we used are those used by advertisers to inform their advertising strategies and we feel therefore confident that the age ranges used here are appropriate.

We were unable to assess, in the scope of this study, the impact of (self-)regulatory policies on (alcohol) advertising and television programming by governments, producers, advertisers and television networks, but we should emphasise that this study deliberately selected countries that presented a policy mix on alcohol advertising in different settings. Future work should seek to repeat this analysis for a wider range of countries, ideally covering a time frame of 12 months, to better understand youth exposure to alcohol advertising on television in Europe in relation to policies in place in different settings.

Keeping these limitations in mind, our study has provided evidence that adolescents and teens in the UK and the Netherlands are significantly more exposed to alcohol advertising on television than adults. In these countries, increased adolescent viewership is associated with increased alcohol advertising. We did not examine the extent to which our observations are the result of advertisers purposely targeting young viewers; indeed, our analysis did not set out to establish intent. Rather, it sought to assess whether such an association occurred and so inform policy towards minimising exposure.

2.3.2 Alcohol advertising portrayals on television

Our analysis of alcohol advertising portrayals on television in the UK, the Netherlands and Germany found that many such adverts do include content which may be considered appealing to young people. The features most commonly identified were use of music and people characters, followed by use of special technological effects. Use of cartoons or animation was not observed in any of the adverts studied.

Alcohol advertising portrayals as analysed here differed across countries. For example, in the UK, adverts tended more commonly to contain features considered appealing to youth. Conversely, in Germany and the Netherlands adverts frequently focused on the features of the drink itself, for instance its history, production or ingredients. In the UK, adverts

tended to focus on the qualities associated with consuming the drink (eg smooth or refreshing) and the occasions where drinks would be consumed. There was less emphasis on the product itself, which was often mentioned at the conclusion of the advert only (Beer 4), or placed within the story (Beer 3) without any obvious connection to the storyline. Disconnecting the product from the storyline may provide a means for advertisers to show, for example, battles or social interactions without violating advertising policies in place.

Our analysis of alcohol advertising portrayals drew on work carried out elsewhere that identified features considered appealing to youth.^{37-38 40-41} Most of that work was carried out in the US³⁷⁻³⁸ and Australia⁴¹ and the applicability of this work to the European context has not yet been studied in great detail. In our analysis, some of the features that were identified as appealing elsewhere had to be dropped after pilot-testing as we were unable to establish consensus among raters with regard to their interpretation. Examples include a simple storyline and originality. Furthermore, the analysis of alcohol advertising portrayals used only a small number of adverts from each of the three study countries. While these were recorded from those channels (n=2) and dayparts with the highest volume of youth viewership (n=3), they spanned a short period of 4 weeks only and cannot be seen as representative. Our analysis is therefore to be considered exploratory rather than confirmatory, and it will be important to repeat this analysis in future using a larger sample of adverts across a wider range of channels, and covering a longer time period so as to capture seasonality.

Our study used bilingual raters who were familiar with the culture of the three countries under review. In the framework of this study it was not possible to apply cross-country rating of adverts, although pilot-testing the framework for analysis did establish a common frame for assessing the adverts for all raters. One obvious limitation of our approach is the use of adult raters and it may be important, in future, to involve young people in the rating process, for example, in the form of 'youth rating panels' used by the recent Alcohol Marketing Monitoring in Europe study.⁹⁰

Alongside our content analysis of alcohol adverts, we also undertook a small case study of alcohol advertising and marketing during football matches broadcast in the UK. This found that in addition to alcohol advertising during advertising breaks, viewers are exposed to a wider range of marketing strategies. The most frequently observed strategy was pitchside alcohol advertising, which we recorded in all 11 matches included in the study, alongside additional advertising related to sponsorship recorded in two out of four games. The consequences of this (additional) exposure are difficult to quantify on the basis of this small exercise, and, taken together with our findings analysing alcohol portrayals in advertising, there is a need to better understand the relative impacts of content and frequency of advertising on subsequent consumption. A future study might consider an experimental approach in which viewers are randomly allocated to watching football matches, with one set of matches containing elements of alcohol marketing and the other without any such elements (eg recorded in France). Outcomes could be assessed in different ways, for example, through observing participants' alcohol consumption while they watched the match or by using lexical decision tasks,⁹¹ which predict that participants would be faster at recognising alcohol-related words if there is a priming effect.

2.3.3 Alcohol advertising policies and advert compliance

The three countries under review have all instituted a mix of statutory and voluntary national-level policies guiding alcohol advertising on television. Statutory frameworks may include wider regulations on advertising impacting on alcohol advertising, for example restrictions on advertising on public service channels such as in the UK and Germany. In the Netherlands, alcohol advertising on television is prohibited between 6.00 and 21.00 hours. In addition, countries have implemented specific stipulations on the content of alcohol advertising.

Overall, we found only a few instances of adverts which might be considered a direct violation of statutory or voluntary regulations. Where such instances were identified, the extent to which the relevant stipulations applied was not clear because of a lack in definition on the side of the ‘regulator’, whether statutory or voluntary. This lack of clarity was most apparent in stipulations that argue for advertisements not to include elements that are considered appealing to youth. However, where we applied the evidence of the literature that has identified such elements on a sample of adverts in the countries under review, we found that in several, if not all, instances the adverts in question violate these stipulations by virtue of containing at least one of these elements (most frequently use of music, people characters and technological effects).

The question therefore arises whether the stipulations currently in place provide for sufficient guidance to protect young people from potential exposure to alcohol advertising, and, by extension, the likelihood of young people taking up alcohol use. Regulations in place leave substantial room for interpretation, so creating an environment of uncertainty for advertisers and regulators. This issue has been highlighted in a recent study that examined alcohol marketing practices in five European countries.⁹⁰ As part of the study, complaints were filed to the relevant national authority against a select set of alcohol marketing practices that the study’s authors considered to be in violation of existing national rules for self-regulation. The practices in question were also presented to youth rating panels established by the study group. The majority of complaints (199 concerning 84 advertisements) were not upheld (72 per cent), but many of them were rated as appealing or attractive to youth by the youth rating panels. Elements identified concerned mostly elements of music and the use of humour. These observations further emphasise the need for stipulations to be defined more clearly if they are to protect youth from exposure to alcohol advertising.

CHAPTER 3 **Assessing youth exposure to alcohol advertising through online media**

This chapter reports on the findings of the analysis of alcohol advertising online in the UK. We use four case studies of alcohol brand websites and social networking site providers to better understand alcohol advertising patterns in online media. We begin by describing the methodological approach including available metrics on the use of social networking websites by young people, and then present the findings of the four case studies to better understand alcohol advertising patterns in online media.

3.1 **Methods**

We used a combination of methods to assess the exposure of young people to alcohol advertising online, involving analysis of commercially available data on online audiences and case studies of selected forms of online media. We chose this approach as initial analysis of the online data (described in detail below) found alcohol advertising on non-social networking websites to be very limited, with only one instance of alcohol display advertising during the 6-month period covered by our data. We therefore focused our analysis on alcohol brand websites and social media websites, using four case studies of alcohol brand websites and of social networking site providers to better understand alcohol advertising patterns in online media. We complemented this by a ‘mystery shopping’ approach and content analysis of the presence of five brands on three social media sites: Facebook, Twitter and YouTube, and of their respective brand websites.

3.1.1 **Online data**

Given the challenges associated with tracking online exposure, as described in Chapter 1, and the emerging nature of research in this field, this study focused on one country for analysing online exposure to alcohol advertising. We selected the UK as a case study since, as noted in Section 1.2, online advertising in the UK constitutes the largest share of total advertising spend among a range of European countries, at just under 30 per cent.¹²

We obtained data tracking online audiences from Ebiquity, which draws on comScore, a widely used resource for digital reach and penetration data,⁹² as per the following specifications:

- the top five most visited non-social and top three most visited social networking websites, by age (6–14 years; 15–24 years) and gender, for each month from December 2010 to May 2011, based on unique user figures

- advertiser, brand and product detail of any alcohol ad appearing on the non-social network websites on the home page and any page at the second or third level on the site for December 2010 to May 2010; site selection restricted only to those sites running display advertising; search engines and advertising networks excluded
- for each website listed among the top five non-social websites or the top three social websites:
 - *reach (%)* – the proportion of available internet users in a given age/gender group who use the site in question in each month
 - *impressions* – the number of individual pages that the selected age/gender group viewed on that site in each month.

Data provided by Ebiquity followed the age ranges by which the information was readily available, which, as with the television data, did not allow for distinguishing age 18 years as a cut-off between 'youth' and 'adult'. Customising the data to meet the preferred age ranges outlined above was not possible within the budget available for this work.

3.1.2 **Assessing exposure to alcohol advertising: online media**

We analysed viewership patterns for Facebook, YouTube and Twitter by producing a percentage reach and impressions by age and gender across the 6-month period between December 2010 and May 2011.

3.1.3 **Conceptualisation of online media case studies**

We selected four case studies to better understand alcohol advertising patterns in online media. These were on:

- selected alcohol brand websites
- Facebook
- YouTube
- Twitter.

Within each, we examined five alcohol brands that had the highest impacts among the 4–15 year age group in the UK, as identified by the quantitative analysis of exposure to alcohol advertising on television (Chapter 2). For each brand we identified the brand website and the marketer-generated brand presence on Facebook, YouTube and Twitter. Marketer-generated brand content was identified either by following links from the alcohol brand website, by a statement 'this is the official page' on the social media page, or by the presence of content originating from the alcohol brand, such as competitions and product giveaways. Where more than one marketer-generated page was available, typically associated with different countries, we chose the UK page to study in more detail.

Analyses as described in this section were carried out from February to April 2012. Online content tends to change frequently within short periods of time; we therefore give precise dates for observations made wherever possible.

Alcohol brand websites

Gordon (2011) examined the websites of the top ten alcohol brands websites in each category of lager, spirits, flavoured alcoholic beverages and cider/perry in the UK.⁹³ Out of

a total of 40 brands examined, 27 (67.5 per cent) operated a website, either dedicated to the brand or shared with other brands. He further examined websites according to a set of specific features, including operation of an age verification page, presence of a sports section, a music section, video games, downloadable content, competitions, driving or car or sexual references. Building on this work, we applied the features identified by Gordon⁹³ to the five brands selected as case studies in this report. We examined the websites of each brand on the same day (21 February 2012) and analysed their features according to the matrix developed by Gordon.⁹³ We also examined the patterns of how individual brand websites related to other online sources, such as linking to the website of the alcohol-industry-sponsored UK Drinkaware website aimed at ‘equipping people with the knowledge they need to make decisions about how much they drink’⁴³; a Facebook page, YouTube page and/or Twitter page. We also recorded the presence of applications to directly ‘tweet’ the page through Twitter or to ‘like’ the page through Facebook.

Facebook

In order to understand brand presence and marketing through Facebook we set up two Facebook profiles, one for a fictional user aged under 18 years (age 14) and one for a fictional user older than 18 years (age 24). We used these profiles to visit Facebook and examine the brand-related content that was available to each age, again focusing on the top five alcohol brands considered in the online case study described above.

Using each of the two profiles, we searched for all pages, groups, applications and events that were associated with each of the five brands. The search findings were screened to determine whether the results were associated with the product and these were compared between the two ages. In a second step, we examined the website of the alcohol brand under consideration that had been designated as the ‘official’ brand page for the UK. We described the content of this page, examining the frequency and type of comments on the page wall, and the presence of adverts, competitions, alcohol sale links and other applications which had been added to the page.

We used the profiles we created to indicate interest of the Facebook user in alcohol by adding topics such as alcohol, drinking, pubs, beer and spirits to the activities and interests section of the fictional profiles. Using these profiles we assessed the average number of alcohol adverts that were shown on the home page of each of the two users.

YouTube

Similar to our approach to Facebook, we created two YouTube profiles, one for a fictional user aged under 18 years and one for a fictional user older than 18 years. We used them to study brand activity on YouTube, focusing on YouTube channels managed by alcohol producers. For each channel studied we examined channel activity by the length of time the channel had been active, the number of videos available and the latest activity. We also examined user engagement with the channel through the statistics provided on video views and channel subscribers. We describe the types of videos available on the channel as well as the links provided to other social media sites. Using our two different fictional user profiles, we studied age restrictions on channel access and recorded any information that was provided about viewing age.

Twitter

Similar to our approach to Facebook and YouTube, we created two Twitter profiles, one for a fictional user aged under 18 years and one for a fictional user older than 18 years. We used them to visit Twitter and search for Twitter pages associated with each brand under consideration. For each Twitter page identified we assessed the activity through frequency and total number of tweets and the number of followers of that page. We also examined the types of subjects covered by the tweets and used the fictional under-18 profile to assess presence of age verification mechanisms on the site.

3.2 Findings

3.2.1 Quantitative analysis of the engagement of young people with alcohol brands through social media websites and alcohol brand websites

It is difficult to determine the scale of exposure of youth to alcohol advertising through alcohol brand websites and social media sites without detailed data on the website traffic, which we did not have available. One way to approach this understanding is by examining the extent to which young people interact with these sites. Another is to analyse measures that count the overall interaction with these websites, using metrics such as the 'likes' (Facebook), 'followers' (Twitter) and 'views' (YouTube) associated with each web page, although these metrics are not typically disaggregated by age. It should be noted that, given the fast-changing nature of the online world, the work presented in this chapter should be seen as a series of snapshots, highlighting areas for further exploration, rather than a confirmatory assessment of online exposure to alcohol advertising.

Table 3.1 presents the summary metrics for the top three social networking websites in the UK by age and gender, from December 2010 to May 2011, considering per cent reach, that is, the proportion of available internet users in a given age and gender group who use the site in question in each month, and impressions, namely the number of individual pages that the selected age and gender group viewed on that site in each month. Facebook and YouTube were consistently the top two most accessed social media websites used by both age groups. However the third most accessed social media site was not consistent across the months. In the majority of months by sex and age group, Twitter was the third most popular social media site, but in others the third place was taken by Formspring, Wikia or Bebo. Since we only had data available for the top three social media sites in each month, the average figures presented for Twitter in Table 3.1 present an average of all the months in which Twitter was included in these top three social media sites.

Table 3.1: Average reach and number of impressions of Facebook, YouTube and Twitter among males and females, ages 6–14 and 15–24 years, monthly data, December 2010 to May 2011

Average reach among internet users (%)				
	Males 6–14	Females 6–14	Males 15–24	Females 15–24
Facebook	39	48	89	91
YouTube	41	43	81	73
Twitter	5	10	19	19
Average number of impressions (million)				
	Males 6–14	Females 6–14	Males 15–24	Females 15–24
Facebook	697	934	2,782	2,717
YouTube	230	154	799	460
Twitter	5	82	22	52

The reach of social networking sites was comparatively consistent across age groups and the period of observation. Facebook consistently had the highest reach, of between 89 per cent (males) and 91 per cent (females) among those aged 15–24; thus, during December 2010 to May 2011 each month around 90 per cent of the UK population in this age group visited Facebook. This was followed by YouTube, reaching an average of 73 per cent (females) to 81 per cent (males) among those aged 15–24 years, with Twitter reaching about one-fifth of users in this demographic.

There was more variation in use among those in the younger age group, with Facebook and YouTube achieving a similar reach of around 40 per cent (Table 3.1). Twitter was less commonly used by those in this age group, and used slightly more frequently used by girls (10 per cent) than boys (6 per cent). There was also considerable variation in the number of impressions generated – the number of individual pages that the selected age and gender group viewed on that site in each month.

While these figures provide some indication of the usage of each social networking site by different age groups, the available data at present do not allow us to determine the proportion of users who interact with alcohol brand content on each site. We sought to better understand the potential level of interaction with selected alcohol brands by examining, in our case studies of online alcohol advertising, the level of user engagement with social networking sites via the use of features such as Facebook ‘likes’, the number of subscribers (YouTube) or followers (Twitter). As described in Section 3.1.3, we selected the top five brands based on our analysis of youth exposure to alcohol advertising on television in the UK (see Chapter 3). These were three beer brands (Beer 3, Beer 19, Beer 21), one cider brand (Cider 4) and one spirit brand (Spirit 11). The findings of this assessment are shown in Table 3.2; we were unable to disaggregate this information by age although it is available to the page owners.⁹⁴

Facebook engagement can be assessed by the number of ‘likes’ and the number of ‘people talking about this’ (Table 3.2). ‘Likes’ are created when a user clicks on a ‘like’ button on the brand page, to indicate that they like a brand. This can only be performed once by each user. It then places a ‘story’ on the user’s profile wall, which will also be shown in the

news feed of the user's friends, reporting that the user liked the page, and providing a link to the brand page. Once the user has 'liked' a page, s/he will receive updates in his/her wall from that page.

Table 3.2: User engagement with social networking sites, 21 March 2012

	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
Facebook: 'likes'	127,268	75,328	70,024	183,091	122,486
Facebook: 'people talking about this'	2,767	2,165	557	2,628	1,003
YouTube: subscribers	11,561	51	14	49	46
YouTube: video views	9,351,097	94,172	30,584	14,837	93,681
Twitter: followers	3,635	47 *	1,226	3,310 *	3,970

NOTE: * as at 27 March 2012

Facebook's 'people talking about this' gives an indication of the number of people who created a 'story' about a page in a 7-day period. 'Stories' can be created by liking a page, but also by other actions, including posting on a page wall, liking a post, answering a question, responding to an event, and several others.⁹⁵

The entry 'YouTube: subscribers' in Table 3.2 indicates the number of people who have 'subscribed' to the YouTube channel. Subscribing to a channel adds this channel to a user's homepage and the user then receives updates from the channel. The entry 'Twitter: followers' shows the number of people who have signed up to 'follow' the company in question on Twitter, so that tweets made by the brand account appear in the individual user's Twitter feed.

The extent of user engagement with alcohol brand websites is more difficult to determine. One provider who compiles data on the audience demographics for each website is Alexa, a web information company.⁹⁶ Alexa data are based on a global panel of toolbar users, using toolbars created by over 25,000 different publishers. The panel consists of millions of people who form a sample of all internet users. However, the representativeness of this sample is unknown; it is likely to be biased towards self-selection by virtue of use of one of the aforementioned toolbars. Keeping this limitation in mind, Alexa provides figures on the population of a given website among different age groups relative to the general internet population. Based on Alexa data, the brand websites for Beer 3, Beer 19, Beer 21, and Cider 4 appear to be over-represented by 18–24-year-old users, which is the youngest age group reported on. Conversely, this age group is under-represented on the Spirit 11 brand website.⁹⁷

3.2.2 Facebook: analysis of alcohol marketing content

Facebook is a social networking site which allows users to share photos, post comments and send messages to other users in a network of 'friends'. Each Facebook user must create an account and is then able to populate a 'profile' with a profile picture, and information such as location, and personal details such as date of birth, education and work and interests. Users can add photos and notes to their profile page and create links with friends who are also using Facebook, allowing them to view their personal profile and receive their 'status updates'. Additionally, users may join common-interest user groups, join events and use applications. Facebook allows any internet users who declare to be at least 13 years old to become registered users of the site. Activities of a user on the Facebook website such as

comments made on their own or others' profiles, new photos posted, games played or pages 'liked' are shared with the user's 'friends' through notifications on their 'wall'.

During the course of our analyses, Facebook allowed a change in the format of all users' profile pages from that of a 'wall', which listed recent comments or notifications by others in the user's network, to the 'timeline' format, as shown in Figure 3.1. The profile page also includes lists of friends, a folder of photos and additional information and applications added by the user.



Figure 3.1: Example of a user's Facebook profile page (accessed 13 March 2012)

In addition to their profile page, users can create events, create groups or create another page associated with, for example, an institution, product or cause. Facebook users with the necessary technical skills can also create applications, which can range from an image to a game or quiz.

From November 2007, Facebook has permitted the creation of pages associated with a business, brands or organisation.⁹⁸ Brand pages are similar in format to profile pages, with a timeline showing comments and activity by the brand and other users, and additional applications, such as photos, videos and others added by the brand. Figure 3.2 and Figure 3.4 present examples of brand pages.

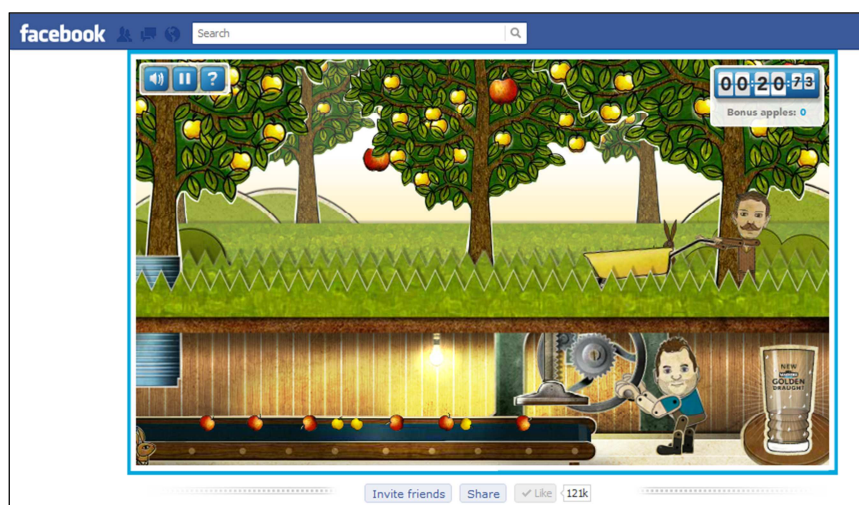


Figure 3.2: Cider 4's game Catch n Crush (accessed 14 March 2012)

To analyse presence of the five selected alcohol brands on Facebook (see Section 3.1.3) we have used each brand name to search for all pages, groups, applications and events related to these brands. These may be generated either by the brand organisation (marketer-generated) or by other users (user-generated). The use of age restrictions on this content is discussed further in Section 0.

Table 3.3 presents the brand-related content identified from searching for each brand name within Facebook. There were a number of pages, groups, applications and events associated with each brand. Most of them were not clearly labelled and may have been created either by the alcohol company or by other Facebook users. Beer 21 was identified as having the highest Facebook content, with 49 pages, 77 groups, 15 applications and two events related to this brand.

Table 3.3: Overview of brand-related activity on Facebook (accessed 21 February 2012)

Facebook content	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
Official content*	✓	✓	✓	✓	✓
User-generated content*	✓	✓	✓	✓	✓
Number of pages relating to drink brand	19	23	14	49	54
Number of groups relating to drink brand	11	23	7	77	64
Number of applications relating to drink brand	5	8	9	15	10
Number of events relating to drink brand	0	35	0	2	5

NOTE: * '✓' indicates that item is present

Although in many cases it was difficult to distinguish between brand marketing and user-generated content, for each brand we identified at least one page that appeared to be generated by the alcohol producers. We have labelled these as 'official content', in line with terminology used on Facebook. These are characterised by a statement in the page info, for example, 'Welcome to the official [brand name] page on Facebook' or by following links to the page from the brand website, ensuring that the page is associated directly with the brand. Table 3.4 shows the findings of the analysis of brand's official Facebook to further describe the marketer-generated alcohol marketing present on Facebook.

Table 3.4: Content of the official brand page on Facebook, 21 February 2012

Content of official page	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
'Like' button	✓	✓	✓	✓	✓
Page wall	✓	✓	✓	✓	✓
Frequency of brand comments on wall	Daily	> weekly	> weekly	> weekly	daily
Video advert	✓	✓	✓	✓	-
Competitions or free giveaways	✓	✓	✓	✓	-
Alcohol sale links	-	-	-	-	✓
Link to website	✓	✓	✓	✓	✓
Link to Drinkaware	✓	✓	✓	✓	✓
Link to Twitter	-	-	-	-	✓
Examples of additional content or applications on page	Comedy videos	Sports info, music info, photos and videos of football	Cocktail recipes, 'Mask Yourself' app, information about ad campaign	Adverts, prize draw	Twitter feed

NOTE: '✓' indicates that item is present; '-' denotes that item is not present; '> weekly' means several times per week

Each official Facebook page operated a page wall or timeline where the brand marketers posted regular comments and updates. All brands posted comments several times each week, with Beer 3 and Cider 4 posting daily comments. They also featured a 'like' button, which creates a link between the user and the brand. User who had 'liked' the page would receive comments from the brand marketers displayed on their own wall or timeline. In addition, four out of the five official brand pages analysed showed video adverts for brand products and hosted competitions or product giveaways. One official page (Cider 4) offered a link to the sale of alcohol. All official Facebook pages linked to the brand website, as well as to the UK-based Drinkaware website,⁴³ with Cider 4 also providing a link to the Twitter site.

Adverts within Facebook

In addition to the brand engagement possibilities, Facebook also provides for more traditional display advertising. Advertisements are currently presented in the right-hand column of Facebook pages as shown in Figure 3.3.

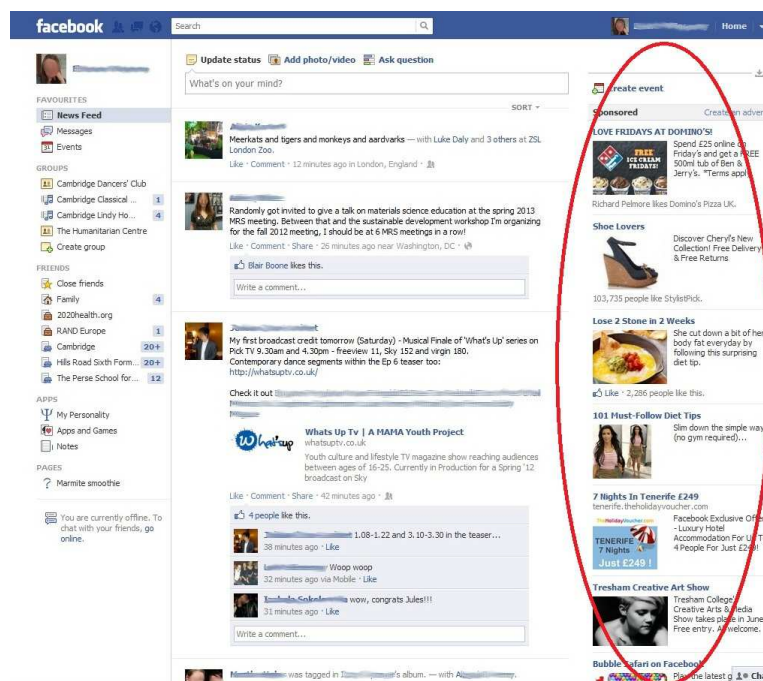


Figure 3.3: Display advertising on Facebook

To assess the proportion of alcohol adverts on Facebook and because Facebook adverts are targeted towards a user’s interest, we used our fictitious Facebook users aged 14 and 24, with interests listed as alcohol, drinking, pubs, beer and spirits, and who had ‘liked’ several alcohol-related pages and groups, as described in Section 3.1.3. We assessed the number of alcohol adverts appearing on the home page by refreshing the home page multiple times, so that new adverts were displayed. On average seven adverts were displayed on the home page of the fictitious Facebook user at any one time. This was repeated on two occasions, in March and June 2012. The user aged 14 did not see any adverts relating to alcohol, but the 24-year-old user did see alcohol-related adverts. In March 2012, 7 per cent of adverts for the user aged 24 (n=100) were related to alcohol, whereas in June 2012, 48 per cent of the adverts were related to alcohol (n=109). In total the 24-year-old user saw only a small number of independent alcohol adverts, but these were frequently repeated.

Case study: Spirit 11 Facebook page

Figure 3.4 presents a snapshot of the Facebook page of Spirit 11, visited on 2 March 2012.



Figure 3.4: Facebook page of Spirit 11 (accessed 2 March 2012)

The main feature of the Spirit 11 Facebook page is the wall or timeline, which includes questions, quizzes and comments that invite users to respond and engage in conversation with Spirit 11 marketers. Other functionalities include 'Info', which gives further information about the page, and several additional applications such as Photos and Events. Further brand-related applications have also been added, such as:

- Cocktails: cocktail recipe cards which include Spirit 11
- Face of [brand name]: information about a competition to be the 'new face of [brand name]' in the ad campaign
- Mask Yourself: an app to add Spirit 11 style masks to your pictures on Facebook
- Red Glasses Bartenders: photos of bartenders who serve good cocktails made with Spirit 11.

3.2.3 YouTube and Twitter: analysis of marketer-generated alcohol marketing content

YouTube

YouTube is a video-sharing website, created in 2005, which allows users to upload, view and share videos. Users have the option of logging-in to the site and they can create a home page and subscribe to particular 'Channels', information about and activity of which

is then shown on the home page, including new uploads, comments, playlist creation and 'likes'. New channels can be added to the home page at any time. Since YouTube was bought by Google in 2006,⁹⁹ login to the site is through a Google account. Users who are not logged in will see a 'feed' of highlighted videos and can watch these videos without the need to log in.

All signed-in YouTube users can upload videos up to 15 minutes in duration. These videos can be viewed on the site, and may also be embedded within pages outside of the YouTube site, such as social networking pages or blogs. YouTube videos are not generally intended for download. While YouTube is not a typical social network in that it is not possible to search for and 'follow' individuals, logged-in users can create a channel. Any content that is shared by the user will then be posted to the channel feed and can be seen by subscribers to the channel on their home page.

YouTube does not monitor all content posted on the site but relies on its users to flag the content of videos as inappropriate. YouTube states that their '24/7 review team' will view a flagged video to determine whether it violates the site's terms of service.¹⁰⁰

We analysed the YouTube channels for the five alcohol brands under consideration in this study. All five brands operated a YouTube channel, containing various videos, such as product adverts, demonstrations of how to prepare cocktails (Spirit 11), videos about how the adverts were made, or comedy videos (Beer 3 and Cider 4), summarised in Table 3.5. It was difficult to assess whether these channels were marketer-generated or user-generated. The Beer 3 and Cider 4 YouTube channels could be accessed by linking from the brand website, while the Spirit 11 YouTube channel stated in the information that it is the 'official [brand name] channel on YouTube'. It was unclear whether the Beer 19 and Beer 21 channels were marketer-generated or user-generated.

Table 3.5: YouTube statistics, 21 March 2012

YouTube statistics	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
Joined YouTube (date)	10 Mar 2006	14 Sep 2011	4 Nov 2010	1 Nov 2010	8 Mar 2010
Latest activity (as at 21 March 2012)	21 Mar 2012	22 Feb 2012	5 Dec 2011	14 Jul 2011	21 Mar 2012
Videos (number)	97	2	16	10	17
Video views (number)	9,351,097	94,172	30,584	14,837	93,681
Channel subscribers (number)	11,561	51	14	49	46
Link to website (Y/N)	✓	-	✓	✓	-
Link to Facebook (Y/N)	-	-	✓	-	-
Link to Twitter (Y/N)	-	-	✓	-	-
Drinking age message (Y/N)	-	✓	✓	-	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

As shown in Table 3.5, Beer 3 created a YouTube channel in 2006 with more than 11,000 subscribers to its channel. The other four brands' YouTube channels have been created more recently, in 2010 or 2011. The channels also varied in the frequency with which they were updated, with Beer 3 and Cider 4 channels updated on the day of analysis, while Beer

21's last update was more than 8 months previously. In three out of five cases the YouTube channel provided a link to other online media such as the website, Facebook and Twitter, and two of five channels included a drinking age message. Drinking age messages stated 'This content is for over 18s only' (Beer 19) and 'You must be of legal drinking age in your country of residence to subscribe to this channel' (Spirit 11).

Case study: Beer 3 YouTube channel

As indicated above, of all the brands that we studied, Beer 3 had longest-standing YouTube presence, with a current list of 97 videos. Of the five brands, Beer 3 also provided the most recently updated channel, with an update on the day of the analysis presented here.

Much of Beer 3 advertising is achieved through the secondary product of comedy shows sponsored by Beer 3, known as '[brand name] Funny'. These include *The Fast Show*, Alan Partridge's *Mid Morning Matters*, Brad and Dan's advert 'Good Call' and *Vic & Bob's Afternoon Delights* (Figure 3.5). These are available on the YouTube channel, along with more traditional alcohol adverts.

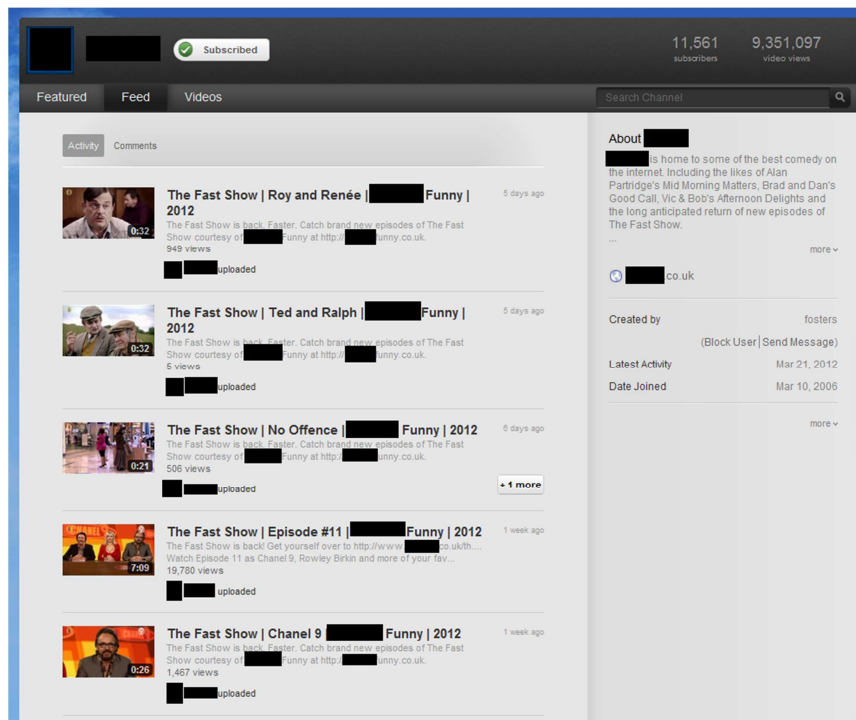


Figure 3.5: YouTube channel of Beer 3 (accessed 21 March 2012)

Twitter

We identified Twitter accounts for all five alcohol brands considered in this study, although in some cases these were related to secondary products of the brand, rather than the alcoholic beverage directly. For example, the Beer 3 Twitter account was in the name of a comedy show associated with the beer brand and the Beer 19 account in the name of a sports competition associated with the beer brand. The profiles varied in their activity and engagement, with Beer 3 tweeting several times a day and with 3,635 followers (as at 21

March 2012), through Spirit 11 and Cider 4, with a 'tweet' occurrence every few days, to Beer 19, which had only 173 followers (as at 21 March 2012) (Table 3.6).

Beer 21 and Beer 19 required an approval process before users could 'follow' the Twitter account and see the tweets. In the case of Beer 19 this involved accessing the Beer 19 website and entering information, including a confirmation that the user is over the legal drinking page. The Beer 21 Twitter account stated that the account was protected and that the 'follow' request was pending. This process was not completed during the data collection period and we were therefore unable to monitor the frequency and type of tweets being made for this account during the study period. Tweets by Beer 3 revolved around comedy videos, while those for Spirit 11 and Cider 4 focused on the drink itself and wider topics relating to the time of year and current events. Spirit 11 and Cider 4 also issued frequent tweets in response to comments from other users.

Table 3.6: Twitter activity of alcohol brands, 21 February 2012

Twitter content	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
Age control message (present)	✓	✓	✓	✓	-
Number of tweets	1,873	252	536	466	2,560
Number of followers	3,635	173	1,226	3,348	3,970
Frequency of tweets	> daily	Restricted	> weekly	Restricted	> weekly
Tweet subjects	Comedy videos	Restricted	Recipes, fashion, responses to followers comments	Restricted	Facts and suggestions about the drink, questions, responses to followers' comments

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

Case study: Cider 4 Twitter account

The structure of Cider 4's Twitter page showed the name of the brand, the Twitter ID named after the cider brand, and the tagline 'There's method in the [brand name]' (Figure 3.6). It also provides a web address for the Magners' Facebook page. The right-hand side of the page shows the recent tweets from Cider 4; the panel can be modified, allowing view of those followed by Cider 4 or Cider 4 followers. Cider 4 maintains a continued engagement with tweets, typically posting every few days, either by responding to other comments or by marketing comments such as: 'It takes the energy from fifty leaves to produce one #apple. No wonder they taste so great eh?' (as at 22 February 2012).

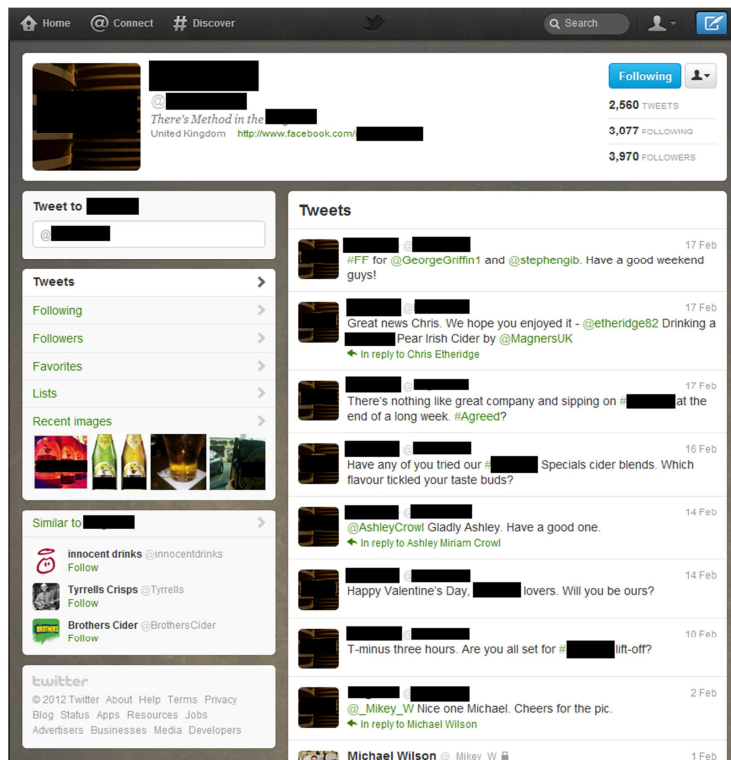


Figure 3.6: Twitter home page of Cider 4 (accessed 21 February 2012)

3.2.4 Age restrictions to alcohol advertising on social networking websites

We analysed each social networking site considered in this study, by comparing access to alcohol-related content by our (fictitious) 24-year-old user and fictitious 14-year-old user (Table 3.7). This showed that while ‘official’ content on Facebook had age restrictions in place, no such restrictions were in place on access to marketer-generated content on YouTube or Twitter.

Table 3.7: Age restriction on alcohol-related Facebook pages, groups, applications and events, 21 February 2012

Facebook content	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
Access of under-18 users to official brand page	No	No	No	No	No
Number of accessible pages relating to drink brand (under-18 user/over-18 user)	16/19	20/23	11/14	18/49	47/54
Number of accessible groups relating to drink brand (under-18 user/over-18 user)	11/11	23/23	7/7	77/77	64/64
Number of accessible applications relating to drink brand (under-18 user/over-18 user)	5/5	8/8	9/9	13/15	10/10
Number of accessible events relating to drink brand (under-18 user/over-18 user)	0/0	35/35	0/0	2/2	5/5

Thus, all ‘official’ brand pages on Facebook examined here restricted access to those under the age of 18 years, but despite these age restrictions there were still many pages, groups, applications and events relating to each drink brand which were accessible to Facebook users under 18 years of age (Table 3.7).

In general, there were no age restrictions for applications, and with the exception of two applications for Beer 21, all applications could be accessed by the under-18 user. Several of these applications were brand-generated, as determined either through links to the brand's Facebook page or the brand's website. For example, the Cider 4 'Catch n Crush' game (Figure 3.2, p. 82), which was trialled at the launch of Cider 4 Golden Draught before being released¹⁰¹ and thus clearly linked to the drink producers, can be accessed through Facebook and viewed by all ages. This lack of age restrictions on applications means that when an under-age user searches for a brand name, the top search result found may be a marketing product generated by the brand, although this could be an application rather than a web page.

Unlike Facebook, YouTube and Twitter did not appear to impose age restriction on alcohol brand content. All YouTube brand channels examined were accessible to under-age users, with only two of the five channels (Beer 19 and Spirit 11) providing a message stating that the user should be of legal drinking age to subscribe to the channel. Twitter displayed a higher number of age-related messages, with four out of five brands including an age message on their brand page. However, because Twitter does not register the age of those signing up for a Twitter account, there is no mechanism for age restriction unless the brand marketers require users to verify their age externally before permitting the user to 'follow' the Twitter account. In June 2012 it was reported that Twitter was testing a new age verification tool, which could be used to verify if users are above the legal drinking age before allowing them to sign up to 'follow' alcohol brands. This is shown in Figure 3.7.

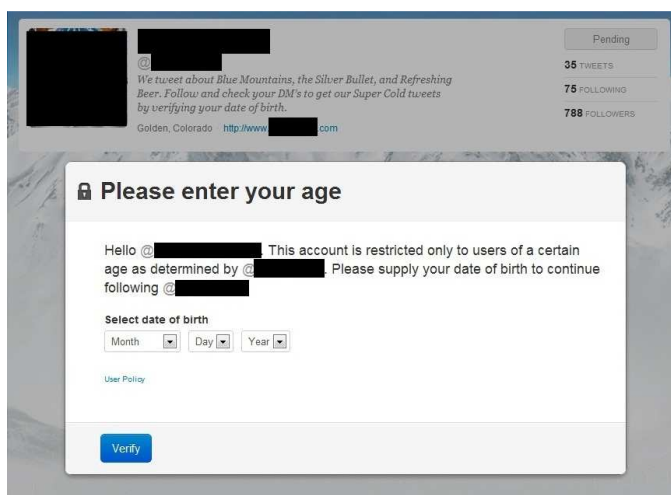


Figure 3.7: Twitter age verification tool

3.2.5 Online alcohol marketing through alcohol brand websites

In addition to creating an online presence through networking sites such as Facebook, YouTube or Twitter, many alcohol manufacturers maintain an alcohol brand website. Such websites may include a range of content such as information about the product, direct marketing through reproduction of adverts, and other features which may help attract website users, such as content focusing on music, sports, games or competitions. It

has been suggested that restriction of alcohol marketing in traditional mass media channels increases the role of alcohol brand websites.¹⁰²

All alcohol brands under consideration in this report had a dedicated brand website, with an age verification page, requiring visitors to enter their age before access to the main website is granted (Table 3.8). Two brands operated a mechanism by which under-age users are redirected to the UK-based Drinkaware website; the remainder simply stated that the site was age restricted or returned the user to the age verification page.

Table 3.8: Matrix of alcohol brand website content, 21 February 2012

Website content	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
Dedicated brand website	✓	✓	✓	✓	✓
Age-restriction control/message	✓	✓	✓	✓	✓
If below age limit, redirects to Drinkaware	✓	✓	-	-	✓
Option for visitors to register on a database	-	✓	-	✓	-
Sports section	-	✓	-	-	-
Music section	-	✓	-	-	-
Video games	-	-	-	-	-
Downloadable content	-	-	-	-	-
Competitions	-	✓	-	✓	-
Driving or car references	-	-	-	-	-
Sexual references	✓	-	-	-	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

Analysing the content of the brand websites, we found little evidence of sports, music, video games or downloadable content. The Beer 19 website maintained a sports section and a music section; however, none of the websites under study provided downloadable content or video games. Two of the five brand websites included the option for visitors to register on a database to receive email updates, and these brands also operated competitions through their website. We found no evidence of driving or car references on any of the websites analysed, although sexual references were included within videos embedded in the Beer 3 website.

Many of the websites included links to other forms of online content. Four of the five brands' websites maintained links to UK-based Drinkaware embedded in the website and they included links to the respective brand Facebook page (Table 3.9). There were no links within the websites to YouTube pages, except for the Beer 21 website, where a link was provided but it was not functional on the day of accessing the material. All brands except Beer 19 included a link to their brand's profile page on Twitter.

There was also the opportunity to send links and messages about the alcohol brand through Twitter or Facebook automatically. These were buttons which allowed the user to 'tweet' the page, thus providing a comment on Twitter about the brand page, or to 'like' the page on Facebook, which places a comment on the user's wall and the user's friend's News Feed with a link back to the website.¹⁰³

Table 3.9: Links from brand websites to other online content

Links to other online content	Beer 3	Beer 19	Spirit 11	Beer 21	Cider 4
Link to Drinkaware (excluding splash page)	✓	✓	✓	-	✓
Link to Facebook page	✓	✓	✓	-	✓
Link to YouTube page	-	-	-	not functional	-
Link to Twitter page	✓	-	✓	✓	✓
Opportunity to 'tweet' the page through Twitter	✓	✓	-	✓	-
Opportunity to 'like' the page through Facebook	✓	✓	✓	✓	✓

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

The presence of these links suggests that the marketers appear to be trying to direct users from the brand website to social media sites where ongoing and more in-depth engagement of users is possible.

3.2.6 Changes in alcohol brand websites over time

We compared the findings of Gordon (2011) with our observation for those brands included in both studies based on the features identified by Gordon (2011);⁹³ these were Beer 19, Beer 21 and Beer 3 (Table 3.10).

Table 3.10: Observed changes to brand websites between 2010 and 2012

	Beer 3		Beer 19		Beer 21	
	2012	2010 (Gordon)	2012	2010 (Gordon)	2012	2010 (Gordon)
Dedicated brand website	✓	✓	✓	✓	✓	✓
Age restricted control or message	✓	✓	✓	✓	✓	✓
Option for visitors to register on a database	-	-	✓	✓	✓	-
Sports section	-	-	✓	✓	-	-
Music section	-	-	✓	✓	-	-
Video games	-	✓	-	✓	-	-
Downloadable content	-	✓	-	✓	-	-
Competitions	-	✓	✓	✓	✓	-
Driving or car references	-	-	-	✓	-	-
Sexual references	✓	-	-	✓	✓	-

NOTE: '✓' indicates that item is present; '-' denotes that item is not present

This comparison showed that the Beer 19 and the Beer 3 websites appear to have reduced the number of features present since 2010. The Beer 3 website today maintains videos, but no longer games, downloads or competitions. Similarly, the Beer 19 website no longer operates video games or downloadable content, which were present in 2010 (Figure 3.8). By contrast, the Beer 21 website, characterised by only a small set of features in 2010, has now introduced competitions and the option to register on a database.

Case study: Beer 19

Figure 3.8 presents a snapshot of the Beer 19 home page, visited on 15 March 2012. In common with the other brand websites studied here, the Beer 19 brand website had an age verification page which stated: 'Users of this site must be over the legal drinking age' and

required the user to enter their age. Entry of an age below 18 led to redirection to the 'Information for under-18s' section of the UK-based Drinkaware website. The Beer 19 website was the most complex of the brand websites that we analysed, because of the wide range of information provided. This included information about the brewing process, a link to a 'beerfinder' website, which permitted the user to sign up to access information and contribute feedback on pubs and bars, as well as detailed news and information about music, festivals and sport. A 'Members' section provided opportunities to join as a member, to sign up to receive a newsletter and other emails from Beer 19 and the parent company, and to enter into various competitions.

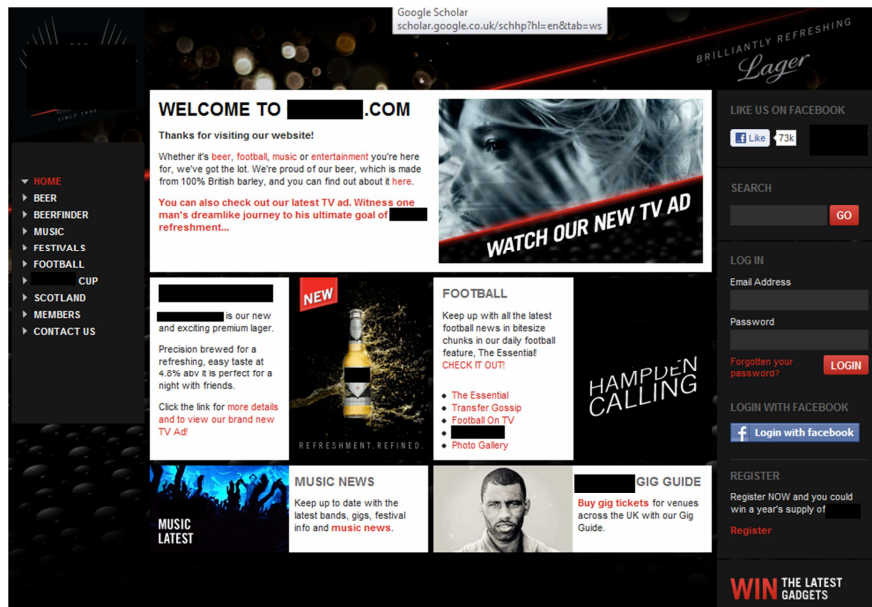


Figure 3.8: The home page of the Beer 19 website (accessed 15 March 2012)

The Beer 19 website was linked to the Beer 19 Facebook page. There was an option to log in to the Beer 19 website using the Facebook login, and to 'like' Beer 19 on Facebook from the website. There were no links on the Beer 19 website to Twitter or YouTube.

3.2.7 Effectiveness of brand website age restrictions

The effectiveness of the age verification page on brand websites is difficult to determine. It seems unlikely that this form of age restriction is effective, since those under age who wish to enter the website will be able to do so by simply entering an age of 18 or above. One potential indication of the effectiveness is provided by Alexa, a web information company described earlier (in Section 3.2.1), which also compiles the most frequent sites upstream or downstream of the UK-based Drinkaware site – those sites visited before or after visiting the Drinkaware site.¹⁰⁴

As noted earlier, several brand websites redirect users who have entered an age on the age verification page that is under the legal drinking age to the Drinkaware website. The five top upstream sites (those most often visited before visiting the Drinkaware site) included [Beer19].com, with 7.1 per cent (30 March 2012) of visits to drinkaware.co.uk (unique visits daily by user) preceded by a visit to [Beer19].com. At the same time, [Beer19].com is also included in the top five sites downstream of the Drinkaware site; after visiting Drinkaware, 5.5 per cent of unique visits were to [Beer19].com (30 March 2012).

However, it is important to reiterate that the representativeness of data provided by Alexa is uncertain and likely to be biased towards self-selected internet users.

3.2.8 Assessing online marketing practices against regulations and codes of conduct

UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing

Online advertising in the UK is subject to the UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (the CAP Code).²⁹ In September 2010 the digital remit of the UK Advertising Standards Authority (ASA) was extended to cover marketing communications online and from March 2011 the CAP code applies to:

Advertisements and other marketing communications by or from companies, organisations or sole traders on their own websites, or in other non-paid-for space online under their control, that are directly connected with the supply or transfer of goods, services, opportunities and gifts, or which consist of direct solicitations of donations as part of their own fund-raising activities.

Among other things, the CAP code restricts:

- portrayals of excessive or irresponsible drinking
- linking of alcohol intake with success, attractiveness or overcoming problems such as boredom and loneliness
- linking of alcohol to driving or working environments or sexual behaviour
- targeting of those under age.

It further contains four specific sections that address youth drinking, including stipulations that marketing for alcoholic drinks should not be targeted at those under the age of 18, 'must not be likely to appeal particularly to people under 18' or directed at people under age 18. It further notes that a medium should be used to advertise alcoholic drinks only where more than 25 per cent of the audience is under age 18. For a detailed overview of stipulations set out in the CAP code please see Appendix B.

In our analysis of online media we did not find instances of alcohol marketing clearly violating the rules set out in the CAP code, but there was one issue of concern, which related to youth drinking. CAP 18.14 stipulates that marketing should not be associated with youth culture, and should not portray characters likely to appeal particularly to people under 18.²⁹ Yet, as we have discussed in relation to alcohol advertising on television (Section 2.2.10), the definition of what constitutes 'appealing to young people' is unclear. On the basis of our analyses presented in Chapter 2, it may be argued that much of the content of the Beer 3 website, and characters such as Vic & Bob and Brad & Dan are likely to appeal to young people. Furthermore, CAP 18.15 specifies that marketing 'must not be directed at people under 18 through the selection of media or the context in which they appear'.²⁹ It could be argued that the use of social media is one way of directing marketing communications at young people, given the usage of social media at this age. In the UK, social networking reach is over 99 per cent among young people aged 15–24, and this group also spends the most time on social networking, with an average of 10.6 hours per month.¹⁰⁵

We were unable, on the basis of data available to us, to determine the proportion of the audience on the social media sites analysed here that is under 18 years of age. We can

therefore not ascertain whether these social networking sites exceed the 25 per cent audience limit set by CAP code 18.15.

Social media alcohol advertising codes

The social networking sites analysed have developed codes for alcohol marketing. These are reproduced in Appendix D.

As described in the introduction to this report, Facebook's alcohol advertising policy varies according to the laws and codes in each country in which it operates. Adverts have to apply age and country targeting criteria, which are determined by Facebook to be in line with local laws. Where a user's age or country cannot be determined, the advert must not be displayed to the user.¹⁰⁶ In addition, developers of applications for Facebook are required to commit that they 'will not promote, or provide content referencing, facilitating, containing or using, the following: Alcohol-related content (unless the appropriate Demographic Restrictions are used), or sale of tobacco products, ammunition and/or firearms'.¹⁰⁷

People are restricted from accessing alcohol-related pages on Facebook through page edit settings, which gives the option to add an age restriction to the page; and one of the drop-down options is 'alcohol related', which automatically sets restrictions for alcohol-related content, by country and by age, varying the age restrictions for each country (Figure 3.9).

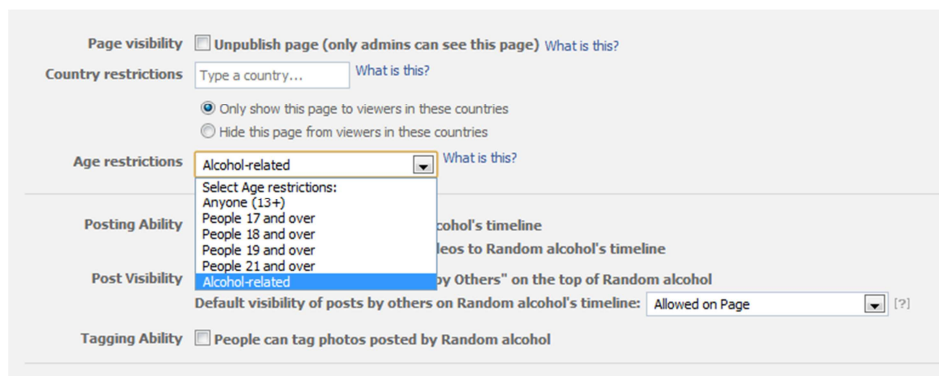


Figure 3.9: The mechanism for restricting access to alcohol-related pages on Facebook (10 April 2012)

YouTube allows alcohol advertising, although it states that 'campaigns may only target countries where these ads are permissible under applicable laws and regulations and all ads must comply with local restrictions'.¹⁰⁸ YouTube does restrict advertising of spirits, requiring that adverts for spirits must be targeted to the appropriate age demographic. The policy states: 'We may require some alcohol-related content to sit behind an age gate in order to be used in an advertisement.' In addition, 'Ads cannot target minors either explicitly or by including endorsements from athletes, cartoon characters, icons/people appealing to minors'.¹⁰⁸ On the YouTube website, despite the statement that adverts must comply with local restrictions, we found no restriction to an under-18 user subscribing to brand 'channels'. Even Spirit 11, a liqueur of 20 per cent, has no age restriction on the brand channel.

We were unable to identify any alcohol advertising policy for Twitter.

Brand advertising codes

For each of the five alcohol brands analysed here we also assessed whether a brand advertising code was available from the producer, either publicly, as identified from the company's website, or by direct request. We identified a code or policy for four of the producers; these codes are summarised in Appendix D. Alcohol producers' codes contained many of the elements of the national regulatory codes and some drew on industry codes such as the Portman Code. In several cases the advertising code developed by the producers of the brand was more detailed than national regulatory codes, for example those for Anheuser-Busch InBev (AB InBev)¹⁰⁹ and Heineken International (personal communication).

The AB InBev Commercial Communications Code and the Heineken UK Responsible Marketing Policy both have specific sections which refer to internet marketing. The Heineken policy considers choice of media and specifies that websites should require users to enter their date of birth, restrict access to those over 18 and ensure that content is not appealing to those aged under 18. Beer 21's code covers websites, emails, viral marketing, the appeal of content, downloadable applications and user-generated content. In addition, the AB InBev Commercial Communications Code, while committing to monitoring user-generated content on channels controlled by AB InBev, stipulates that 'marketing communications should not be presented as user-generated content when that is not the case'.¹⁰⁹

3.3 Discussion

This chapter analysed alcohol advertising in online media in the UK. Our quantitative analysis of engagement with social media websites indicates considerable levels of engagement with three highly accessed social media websites among those young people who are online. Although exposure of young people to advertising online is difficult to assess, this high engagement suggests a high potential exposure to alcohol marketing through these sites. It is more difficult to determine the extent to which young people engage with alcohol-related content through social media sites. To understand this we have provided an overview of population engagement with specific brand pages through the 'likes', 'follows' and video views recorded on Facebook, Twitter and YouTube respectively, but it was not possible to determine the proportion of young people in the user group to obtain a better understanding of their meaning.

Our review of content related to five alcohol brands on Facebook, Twitter, YouTube and alcohol brand websites gives a snapshot of the types of content on social media sites. While we found evidence of both marketer-generated and user-generated content we focused primarily on the marketer-generated content.

It remains unclear how and why users engage with the alcohol marketing content available. Several features provided by social media sites and alcohol brand websites suggest ways in which users are incited to engage with marketer content. These include competitions, free giveaways and comedy videos located on these sites. For example if users are required to 'like' a brand on Facebook, in order to qualify to enter a competition, they then open themselves to receiving marketing from that company on Facebook, until the 'like' is undone. We noted that the social media sites and brand websites frequently contained

links to other social media sites, suggesting that companies may be trying to induce users to access these sites.

We found age restrictions to online alcohol-related content to be limited, and suggest this to be an area requiring considerable further development. Although age restrictions were in place on marketer-generated Facebook pages, user-generated content was not controlled through an age verification mechanism. In addition, at the time of data collection, there were almost no restrictions in place on YouTube or Twitter. The 'age verification page' applied to alcohol brand websites is unlikely to act as deterrent for those who wish to access the contents as it can easily be bypassed.

As noted before, online content tends to change frequently within short periods of time and while we have been able to provide important insights into potential exposure to alcohol advertising online of young people, there is a need for longer term research that is able to monitor trends using a combination of quantitative audience and marketing data combined with a systematic analysis of how young users engage with content, and, importantly, whether and how this influences subsequent use of alcohol.

Work presented in this report used novel approaches to measure alcohol advertisement exposure among young people in Europe through audiovisual and online media. Using a series of quantitative and qualitative analyses we provide evidence for how adolescents in the UK and the Netherlands were significantly more exposed to alcohol advertising on television than adults, although this effect was not seen in Germany. We further showed that high exposure to alcohol marketing was possible on social media sites used by young people, including Facebook, YouTube and Twitter. In addition to volume of exposure, we provide evidence of how the content of television alcohol advertising in the three countries contained many features that appeal to young people, while online content is designed to encourage users to make links between alcohol brand-related content of different websites, alongside the use of incentives to access online content through competitions, giveaways and, in one example, comedy videos.

Our study has aimed to understand the volume of alcohol advertising young people are exposed to through television and online media while also examining the way alcohol is being portrayed in these media. The need for this research arose from existing evidence linking alcohol advertising and media exposure to alcohol use among young people. Evidence from systematic reviews suggests that advertising increases the likelihood that adolescents will start to drink alcohol³⁻⁴ although there is a need for more work to understand this relationship better.¹¹⁰ In particular, it will be important to explore further the mechanism by which advertising influences subsequent drinking behaviour among youth.¹¹¹⁻¹¹³

It will also be important to improve our understanding of role of quantity or volume of exposure as well as content of alcohol portrayals in adverts in influencing subsequent behaviour. Recent work in the UK, studying a sample of about 400 primary school children aged 10–11 in Wales, has shown that the majority of the children (between two-thirds and 95 per cent) recognised alcohol brands and that recognition of certain alcohol brands was higher than that of food brands.¹¹⁴ Recognition related to company brands and logos as well as characters from alcohol television adverts, suggesting that both factors play a role. That study did not examine subsequent behaviour among children as regards alcohol consumption, and although it showed that among children who had used alcohol before recognition was higher, the direction of the relationship remains unclear. These findings, while in need of confirmation elsewhere, suggest how it is important to understand the role of brand recognition in relation to future behaviour.

In contrast to the evidence on the association between alcohol advertising in traditional media and alcohol consumption among young people, there is scant empirical evidence on the effect of social media alcohol marketing on youth drinking.¹¹⁵⁻¹¹⁶ It is possible that social media marketing may have a stronger effect than traditional advertising due to features such as its highly interactive nature and the use of peer influence. The interactive nature of online marketing was highlighted by Ribisl (2003) in a review of the influence of the internet on youth smoking, which noted how it allows for the user to spend 'far more time browsing and interacting with a pro-smoking website than viewing a static cigarette advertisement in a magazine'.¹¹⁷ Further strategies such as creating the opportunity for user comments on brand pages and the sharing of page links between friends (for example using the Facebook 'like' button) allowing peer influence may also increase the effect of marketing.¹¹⁸

European citizens generally do not appear to be in favour of alcohol advertising targeting young people. A recent Eurobarometer survey (2010) found that 77 per cent of respondents across 27 Member States agreed that alcohol advertising targeting young people should be banned in the EU.¹¹⁹ In the countries which we have considered in this study, the corresponding figures were 68 per cent in the UK and the Netherlands and 80 per cent in Germany.

Existing regulation in European Union Member States that are designed to restrict the targeting of alcohol marketing to young people are typically limited to audiovisual media, with moves to extend existing regulations to online media occurring only recently. Regulations of more traditional audiovisual media tend to use time restrictions of advertising broadcast, restrictions on the proportion of the television viewership that should be of legal drinking age at the time at which the advert is broadcast ('watershed'), or restrictions on advert content. The effectiveness of these different forms of regulation is inadequately understood. In this report we examined three countries that use a mix of policies to control advertising to young people in audiovisual media. Of these, the Netherlands is the only country that imposes a time ban on alcohol advertising, prohibiting alcohol advertising on Dutch television from 6.00 to 21.00 hours. Recent work by the Dutch Institute for Alcohol Policy (2012) found the effects of the time ban limited as the volume of alcohol advertisements after 21.00 hours had increased to compensate for the effect of the time ban, although the effect on exposure of young people is expected to vary by country.⁹⁰ Our findings show that, in the Netherlands, the total number of alcohol adverts broadcast on the ten most viewed television channels during a six-month period was considerably lower than that observed for the UK. Yet, when relating the number of adverts to viewership, we found that in both countries adolescents and teens were significantly more exposed to alcohol advertising than adults. Indeed, there was a suggestion of the effect being stronger in the Netherlands than that observed for the UK. While findings cannot be directly compared because of differences in age groups, for example, our findings seem to suggest that a time ban on alcohol advertising may not be suitable to protect minors from high exposure. The limitations of a time ban as a sufficient policy tool become more apparent against the background of an increase in the use of other media such as online television, which provide opportunities to watch programmes at any time.

Existing policies also make use of the option to restrict advertising where under-age viewership proportions exceed a certain cut-off point, of for example 25 per cent or 30 per cent. An example is the Dutch Advertising Code for Alcoholic Beverages, which stipulates that alcohol adverts should not be broadcast before, during or after programmes which 'are listened to or viewed by more than twenty five per cent (25 per cent) minors'.⁴⁶ A similar cut-off point is stipulated by the voluntary code of the Portman Group in the UK, although it is limited to sponsorship of programmes by alcohol producers.⁵⁰ The European Forum for Responsible Drinking (EFRD) recommends a cut-off of 30 per cent.¹²⁰ Again our findings suggest that the impact of such a cut-off point may be limited. There were only very few instances in each of the three countries considered here where the proportion of under-age viewers exceeded 25 per cent. Although our data did not permit us to determine the specific proportions for age 18 as a cut-off point, they strongly suggest that for advertisers to violate a cut-off of 25 per cent or higher will be very difficult indeed, in particular in the Netherlands, where our data covered ages 13–19.

Finally, regulators may also consider restricting the content of alcohol advertisements. Indeed, all three countries studied here have regulations in place that aim to target the content of alcohol adverts. However, as our work has indicated, the corresponding regulatory codes frequently lack sufficiently detailed guidance, leaving substantial room for interpretation and so creating an environment of uncertainty for advertisers and regulators. Further work is needed to ascertain more precisely what features of an advert are appealing to young people and how they can be avoided in alcohol advertising. Such work should make more systematic use of young people's views. The recent study by Alcohol Marketing Monitoring in Europe made use of youth rating panels to assess a selection of adverts which were thought to violate existing national rules, and report on whether they were attractive to their peers.⁹⁰ It found substantial discrepancies between what national regulators would consider 'appealing to young people' and what young people themselves reported to be attractive to them. This highlights the need to involve young people in relevant research, and to understand whether and how views might differ across European countries.

Within the scope of this study it was only possible to study exposure to alcohol advertising on television in three countries in detail. It will be important to repeat analyses for a broader range of countries to better understand the relationship between national frameworks influencing programming and advertising behaviours and their impact on youth exposure to alcohol advertising. Findings for Germany appear to suggest that higher exposure to alcohol advertising among young people is not inevitable and it will be necessary to identify the factors underlying this observation if we are to inform policy development in Member States and the European Union more broadly. A larger sample of countries would also be better suited to inform development of those policy instruments which are likely to have the greatest effect in reducing exposure to alcohol advertising among young people.

Much of the analyses presented in this report, investigating volume and content of alcohol advertising and the regulatory context for advertising, focused on television, although we also provided important insights into the possible extent of youth exposure to alcohol marketing on social media. Given the increasing importance of online media it will be crucial to better understand the impact of regulations on the extent of online alcohol

marketing. Although there have been attempts to put into place restrictions to prevent young people from accessing alcohol-related content online their effectiveness is questionable, for example age verification pages of alcohol brand websites can easily be over-ridden. There is a need for further development of effective ways to control under-age access, such as the development of web-wide firewalls, which can be used to block all alcohol-related content.

There is also a need to better understand potential marketing outlets other than television and social media, such as online video advertising. ComScore reported that in January 2012, online video reached 34 million UK internet users, representing 80 per cent of the total UK internet audience, and of these 64 per cent were exposed to a video advertisement. The study found that those aged 15–24 years presented the largest video advert audience in unique viewers and engagement.¹²¹ Online video adverts are found in a variety of contexts, for example during online television or on the YouTube website. A study of advertising relating to tobacco available on the YouTube website was conducted in 2010,¹²² and a similar work could be undertaken on alcohol adverts. Another area for further investigation is the advertising achieved through mobile internet, which has a 7.7 per cent share of all connected device traffic in Europe, so offering a significant platform for advertising.¹²³

In conclusion, our study has provided important new insights into the exposure of young people to alcohol advertising in audiovisual and online media. We have shown how adolescents and teens in the UK and the Netherlands are significantly more exposed to alcohol advertising on television than adults. We did not examine the extent to which our observations are the result of advertisers purposely targeting young viewers; indeed, our analysis did not set out to establish intent. Rather, it sought to assess whether such an association occurred and so inform policy towards minimising exposure.

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APPENDICES

Appendix A: Portrayals of alcohol in advertisement – coding frame

Coding frame: content appealing to youth

Date

Time

Channel

Length of advert (s)

After what time does it become clear it is an alcohol ad? (s)

Type of drink

Brand

Programme before

Short description of programme
.....

Programme after

Short description of programme
.....

Description of advert (reasonably detailed)

.....
.....
.....
.....
.....
.....

.....

Attribute	Tick if present	Any comments/queries
Humour e.g. slapstick, clownish, sarcasm, irony		
Sexual allusion e.g. good looking, dressed up women or men		
Music		
Cartoons or animation (only animated characters, not special effects)		
People characters (any people who are central to the story)		
Animal characters (any animals who are central to the story)		
Celebrities		
Special technological effects		
People behaving in a childish fashion		
Fantasy settings (any setting which does not occur in real life) e.g. in the past or in space		
Product-focused (if the product is a key part of the advert)		
Easily memorable catch phrase		
Reference to Drinkaware (or similar German/Netherlands		

website)		
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Any other features noticed or thoughts.....?

Appendix B: Statutory and self-regulatory stipulations of alcohol advertising in Germany, the Netherlands and the UK

Regulations on alcohol advertising can be developed nationally, by government or self-regulatory bodies, by the advertising medium, such as a given television channel or website operator, or by alcohol producers.

National regulations differ across countries with restrictions varying from a complete ban on all alcohol advertising (eg Norway), restrictions on specific media (eg France), restrictions on time of broadcast advertising (eg the Netherlands), restrictions on advertising of different types of alcohol (eg Poland), or restrictions in advertising content (eg the UK). Below we provide a summary overview of the main (self-)regulatory stipulations in place in the three countries examined in this study. This overview does not present a comprehensive review of the entire statutory and non-statutory (self-)regulatory framework for alcohol advertising, which has been described in detail elsewhere.¹²⁴

Germany

There are three different regulations in Germany which refer to alcohol marketing and advertising. Two of these are statutory provisions: The Federal Protection of Minors Act (Jugendschutzgesetz), which restricts broadcasting times for alcohol advertising in ‘movie performances’, and the Interstate Treaty for the Protection of Minors from Unsuitable Media Content (Jugendmedienschutz-Staatsvertrag), which contains provisions on the content of alcohol advertising, stating:

Advertising for alcoholic beverages must neither be directed towards children and adolescents nor be designed to appeal especially to children and adolescents nor show them drinking alcoholic beverages.¹²⁵

A third regulation is the non-statutory and self-regulatory ‘Code of Conduct on Commercial Communication for Alcoholic Beverages’ (Verhaltensregeln des Deutschen Werberates über die kommerzielle Kommunikation für alkoholische Getränke), developed by the German Advertising Federation (Zentralverband der deutschen Werbewirtschaft, ZAW) and it is this which in practice forms the main regulation of alcohol marketing and advertising in Germany. This code includes the following statement regarding young people:

Commercial communication for alcoholic beverages:

- (2.1) shall neither promote drinking of alcoholic beverages by minors nor show minors in the act of drinking or promoting the drinking of such beverages.
- (2.2) shall not be conveyed by media the majority of whose editorial content addresses minors.
- (2.3) shall not make any claim or representation to the effect that minors are not old enough to consume alcoholic beverages and so provoke drinking.
- (2.4) shall not show persons stating that they drank alcoholic beverages as minors.¹²⁵

The Netherlands

Three different regulations exist in the Netherlands that specifically refer to alcohol marketing and advertising. The Alcohol Licensing and Catering Act (Drank- en Horecawet), a statutory law to regulate the selling of alcohol beverages, the non-statutory Advertising Code for Alcoholic Beverages (Reclamecode voor Alcoholhoudende dranken; RvA)⁴⁶ and the 2008 Media Act.

The Alcohol Licensing and Catering Act contains an article that gives the Minister of Health, Welfare and Sport the authority to regulate alcohol advertising in an order in council. But this power has not been made use of.

The Advertising Code for Alcoholic Beverages⁴⁶ is the main mechanism for regulation of alcohol beverage advertising in the Netherlands. This includes a ban on advertising through any media where 25 per cent of the audience is under 18 years of age. The following provisions are included which relate to youth advertising:

Article 22. The advertising of alcoholic beverages may not be broadcast on radio and television immediately before, during or directly after programmes that, according to viewer or listener rating figures generally accepted in the market, are listened to or viewed by more than twenty five per cent (25%) minors.'

And regarding internet and other forms of communication:

Article 24. The advertising of alcoholic beverages may not take place by sending solicited or unsolicited SMS messages to minors; nor may it take place in the form of ring tones or mobile games, or in the form of Internet games or other computer games specifically designed for minors. Sponsoring of or product placement in the above-mentioned games by the industry is not permitted.

Article 25. Paragraph 1: Internet sites whose domain name includes the brand name of the alcoholic beverage should clearly state the legal age limit for purchasing alcohol. These Internet sites may not contain chat boxes.

Article 25. Paragraph 2: The advertising of alcoholic beverages on Internet sites that specifically target minors is not permitted.¹²⁵

The 2008 Media Act introduced a legal ban on alcohol advertisements on television and radio from 6.00 to 21.00, which is enforced by the Dutch Media Authority.

United Kingdom

Alcohol advertising in the UK is overseen by a system of self-regulation, administered by the independent Advertising Standards Authority (ASA), which also investigates complaints.

Two separate advertising codes apply to broadcast and non-broadcast advertising. The Broadcast Committee of Advertising Practice (BCAP) is responsible for the UK Code of Broadcast Advertising (BCAP Code), while the Committee of Advertising Practice (CAP) is responsible for the non-broadcast code.

Both the BCAP code and the CAP code contain specific rules governing alcohol advertising, including provisions that advertising should not be likely to appeal particularly to people under 18, feature people drinking and behaving in a juvenile manner, or show people drinking who appear to be under the age of 25. The CAP code also specifies that no medium should be used to advertise alcoholic drinks if more than 25 per cent of its audience is under 18 years of age.²⁹

The BCAP code specifies:

Alcohol advertisements must not:

be likely to appeal strongly to people under 18, especially by reflecting or being associated with youth culture or showing adolescent or juvenile behaviour

include a person or character whose example is likely to be followed by those aged under 18 years or who has a strong appeal to those aged under 18.⁴⁴

In addition to the BCAP and CAP codes there are also voluntary codes of conduct such as the 'Social Responsibility Standards for the Production and Sale of Alcoholic Drinks in the UK' and standards developed by The Portman Group. The Portman Group code states:

A drink, its packaging and any promotional material or activity should not in any direct or indirect way:

(h) have a particular appeal to under 18s (in the case of sponsorship, those under 18 years of age should not comprise more than 25% of the participants, audience or spectators);

(i) incorporate images of people who are, or look as if they are, under twenty-five years of age, unless there is no suggestion that they have just consumed, are consuming or are about to consume alcohol.⁵⁰

Appendix C: Assessment of alcohol advertising policies and advert compliance

This section presents the findings of our assessments of the extent to which adverts of alcohol producers analysed in sections 2.2.6–2.2.8 adhered to the relevant national (self-) regulatory code for (alcohol) advertising in the UK (Table 1), the Netherlands (Table 2) and Germany (Table 3).

Where a given stipulation is not applicable, this is shown as ‘n/a’.

Where a given feature is not present, this is shown as ‘x’.

Appendix C, Table 1: Assessment of adverts of five alcohol brands as recorded on ITV1 and Channel 4 in the UK, February and March 2012, against national-level statutory or voluntary (alcohol) advertising codes

Rules and regulations		Alcohol brand				
BCAP code rules		Beer 1	Beer 2	Beer 3	Beer 4	Beer 5
19.1	Radio Central Copy Clearance – radio broadcasters must ensure advertisements for alcoholic drinks are centrally cleared.	n/a	n/a	n/a	n/a	n/a
19.2	Advertisements must not feature, imply, condone or encourage irresponsible or immoderate drinking. That applies to both the amount of drink and the way drinking is portrayed. References to, or suggestions of, buying repeat rounds of alcoholic drinks are not acceptable. That does not prevent, for example, someone buying a drink for each member of a group. It does, however, prevent any suggestion that other members of the group will buy a round.	x	x	x	x	x
19.3	Advertisements must neither imply that alcohol can contribute to an individual's popularity or confidence nor imply that alcohol can enhance personal qualities.	x	x	x	x	x
19.4	Advertisements must not imply that drinking alcohol is a key component of social success or acceptance or that refusal is a sign of weakness. Advertisements must not imply that the success of a social occasion depends on the presence or consumption of alcohol.	x	x	x	x	x

19.5	Advertisements must not link alcohol with daring, toughness, aggression or unruly, irresponsible or antisocial behaviour.	x	x	x	The ad shows a historical battle scene where people and horses charge down a hill with a fair amount of aggression.	The ad shows a character who has been walking alone in the Rocky Mountains and his clothes were taken by bears.
19.6	Advertisements must not link alcohol with sexual activity, sexual success or seduction or imply that alcohol can enhance attractiveness. That does not preclude linking alcohol with romance or flirtation.	The ad follows an attractive couple as they prepare to go out to a bar, flirting slightly. When they arrive at the bar, all other clients are good looking and well dressed.	Many of the people in the advert are attractive and well dressed.	x	x	Comment on how penguins walk after an intense mating season.
19.7	Advertisements must not portray alcohol as indispensable or as taking priority in life. Advertisements must not imply that drinking can overcome problems or that regular solitary drinking is acceptable.	x	x	x	x	x

19.8	Advertisements must not imply that alcohol has therapeutic qualities. Alcohol must not be portrayed as capable of changing mood, physical condition or behaviour or as a source of nourishment. Although they may refer to refreshment, advertisements must not imply that alcohol can improve any type of performance.	The sight of the alcohol advert appears to send the male character into a trance.	x	x	x	x
19.9	Advertisements must not link alcohol to illicit drugs.	x	x	x	x	x
19.10	Advertisements may give factual information about the alcoholic strength of a drink. They may also make a factual alcohol strength comparison with another product, but only when the comparison is with a higher strength product of a similar beverage. Advertisements must not imply that a drink may be preferred because of its alcohol content or intoxicating effect. There is an exception for low-alcohol drinks, which may be presented as preferable because of their low alcoholic strength. In the case of a drink with relatively high alcoholic strength in relation to its category, the factual information should not be given undue emphasis.	x	x	x	x	x
19.11	Advertisements may include alcohol sales promotions but must not imply, condone or encourage immoderate drinking.	x	x	x	x	x
19.12	Advertisements must not feature alcohol being handled or served irresponsibly.	x	x	x	x	x

19.13	<p>Advertisements must not link alcohol with the use of potentially dangerous machinery or driving. Advertisements may feature sporting and other physical activities (subject to other rules in this section) but must not imply that those activities have been undertaken after the consumption of alcohol.</p>	x	x	x	x	x
19.14	<p>Advertisements must not normally show alcohol being drunk by anyone in their working environment.</p>	x	x	x	x	x
19.15	<p>Television only – Alcohol advertisements must not: 19.15.1 be likely to appeal strongly to people under 18, especially by reflecting or being associated with youth culture or showing adolescent or juvenile behaviour 19.15.2 include a person or character whose example is likely to be followed by those aged under 18 years or who has a strong appeal to those aged under 18.</p>	See Section 2.2.6 for details on the appeal to youth.	See Section 2.2.6 for details on the appeal to youth.	See Section 2.2.6 for details on the appeal to youth. The key characters in the advert, the Australians Brad and Dan, are portrayed as role models, knowing the answers to questions of social acceptance, and may have strong appeal to those under 18.	See Section 2.2.6 for details on the appeal to youth.	See Section 2.2.6 for details on the appeal to youth.
19.17	<p>Alcohol advertisements must not feature in a significant role anyone who is, or seems to be, under 25 and must not feature children. An exception is made for advertisements that feature families socialising responsibly. Here, children may be included but they should have an incidental role only and anyone who seems to be under the age of 25 must be obviously not drinking alcohol.</p>	x	x	x	x	x

19.18	Advertisements for alcoholic drinks may give factual statements about product contents, including comparisons, but must not make any health claims, which include fitness or weight-control claims. The only permitted nutrition claims are 'low alcohol', 'reduced alcohol' and 'reduced energy' and any claim likely to have the same meaning for the audience.	x	x	x	x	x
Portman Code rules						
3.1	The alcoholic nature of a drink should be communicated on its packaging with absolute clarity.	n/a	n/a	n/a	n/a	n/a
3.2	A drink, its packaging and any promotional material or activity should not in any direct or indirect way:					
	(a) have the alcoholic strength, relatively high alcohol content, or the intoxicating effect, as a dominant theme;	x	x	x	x	x
	(b) suggest any association with bravado, or with violent, aggressive, dangerous or antisocial behaviour (though sponsorship of activities which may be dangerous after alcohol consumption, such as motor racing or yachting, is not in itself in breach of this clause);	x	x	x	The ad shows a historical battle scene where people and horses charge down a hill with a fair amount of aggression.	The ad shows a character who has been walking alone in the Rocky Mountains and his clothes were taken by bears.
	(c) suggest any association with, acceptance of, or allusion to, illicit drugs;	x	x	x	x	x

	(d) suggest any association with sexual success;	The two main characters in the ad are a couple and flirt a little.	x	x	x	x
	(e) suggest that consumption of the drink can lead to social success or popularity;	x	x	Brad and Dan are clearly intended as role models who understand how to gain social acceptance. These characters are shown representing Beer 3.	x	x
	(f) encourage illegal, irresponsible or immoderate consumption, such as drink-driving, binge-drinking or drunkenness;	x	x	x	x	x
	(g) urge the consumer to drink rapidly or to ‘down’ a product in one;	x	x	x	x	x
	(h) have a particular appeal to under 18s (in the case of sponsorship, those under 18 years of age should not comprise more than 25% of the participants, audience or spectators);	See Section 2.2.6 for details on the appeal to under 18s.	See Section 2.2.6 for details on the appeal to under 18s.	See Section 2.2.6 for details on the appeal to under 18s.	See Section 2.2.6 for details on the appeal to under 18s.	See Section 2.2.6 for details on the appeal to under 18s.
	(i) incorporate images of people who are, or look as if they are, under twenty-five years of age, unless there is no suggestion that they have just consumed, are consuming or are about to consume alcohol;	x	x	x	x	x
	(j) suggest that the product can enhance mental or physical capabilities.	x	x	x	x	x

Appendix C, Table 2: Assessment of adverts of six alcohol brands as recorded on RTL4 and SBS6 in the Netherlands, February and March 2012, against national-level statutory or voluntary (alcohol) advertising codes

Rules and regulations	Alcohol brand					
	Beer 6	Beer 7	Wine 1	Beer 8	Cider 1	Spirit 1
Elements						
Styles						
<u>Article 10</u> : Advertising of alcohol beverages may not make use of illustrations, colour combinations or designs, cartoons, symbols or idols, sound, music or language or expression typical of minors.	x	x	x	x	x	x
Children						
<u>Article 11</u> : The advertising of alcohol beverages may not show any persons under 25 consuming alcohol beverages or encouraging the consumption of alcoholic beverages.	All the people in the advert are young, probably in their late 20s, early 30s, though it is always difficult to tell.	Most people in the advert are young, probably in their late 20s, early 30s, though it is always difficult to tell.	No people appear in the advert.	The main characters are four men in their mid-late 20s, but it is probably difficult to tell.	The five people appearing in the advert are young men and women in their early 30s.	x
Violence						
<u>Article 14</u> . The advertising of alcoholic beverages may not portray scenes that encourage risky behaviour.	x	x	x	x	x	x
Success						

<p><u>Article 6</u>. Paragraph 3: The advertising of alcoholic beverages may not suggest that the consumption of alcoholic beverages improves physical or mental performance.</p>	x	x	x	x	x	x
<p><u>Article 8</u>. The advertising of alcoholic beverages may not arouse the impression that consumption of an alcoholic beverage enhances social or sexual success.</p>	<p>In the ad, people are drinking beer in different scenarios. In most of them people are drinking in a social environment and seem to be having fun.</p>	<p>The main character is being portrayed as somebody successful. He is probably a movie star himself, and he shakes hands with potential movie characters. He also stars in an oriental martial arts fight with somebody looking like Bruce Lee.</p>	x	x	<p>Two good-looking women are having a drink of [cider 1] and at the same time are watching how three good-looking men are picking up apples from a tree. The advert continues with the group of five people splashing and playing in the open air with liquids (probably Jillz).</p>	<p>A Spanish women is dancing flamenco on a central plaza in a city or town somewhere in Spain. With special effects, the cape the women uses in her dance is ‘pouring’ [spirit 1].</p>
<p>Media</p>						
<p><u>Article 10</u>: The advertising of alcoholic beverages may not target minors specifically.</p>	x	x	x	x	x	x

<p><u>Article 21:</u> No advertising of alcoholic beverages in any form may reach a public that consists of more than twenty five per cent (25%) minors. [...] The attendance figures are the standard for determining the reach of advertising in cinemas and at events.</p>	n/a	n/a	n/a	n/a	n/a	n/a
<p><u>Article 22:</u> The advertising of alcoholic beverages may not be broadcast on radio and television immediately before, during or directly after programmes that, according to viewer or listener rating figures generally accepted in the market, are listened to or viewed by more than twenty five per cent (25%) minors.</p>	n/a	n/a	n/a	n/a	n/a	n/a
<p><u>Article 23:</u> Youth broadcasting stations may not carry any advertising for alcoholic beverages.</p>	N/A	N/A	N/A	N/A	N/A	N/A
<p>Other</p>						
<p><u>Article 12:</u> The advertising of alcoholic beverages may not suggest that the consumption of alcoholic beverages is a sign of adulthood and that abstinence from alcohol consumption is a sign of immaturity.</p>	x	x	x	x	x	x

Appendix C, Table 3: Assessment of adverts of 12 alcohol brands as recorded on ProSieben and RTL in Germany, February and March 2012, against national-level statutory or voluntary (alcohol) advertising codes

Rules and regulations		Alcohol brand											
		Spirit 2	Spirit 3	Beer 11	Spirit 4	Spirit 5	Spirit 6	Beer 12	Beer 13	Non-alcoholic 1	Spirit 7	Spirit 8	Spirit 9
Code of Conduct on Commercial Communication for Alcoholic Beverages													
1	Abusive consumption												
1.1	Commercial communication for alcoholic beverages shall not promote abusive consumption of alcoholic beverages or trivialise such consumption. Commercial communication of 'flat-rate' and 'all you can drink' offers can also constitute promotion of abusive consumption if the event being advertised is identifiably designed to foster irresponsible consumption of alcoholic beverages.	x	x	x	x	x	x	x	x	x	x	x	x
1.2	Commercial communication for alcoholic beverages shall not display any person who has visibly consumed too much alcohol or gives the impression that such consumption is acceptable.	x	x	x	x	x	x	x	x	x	x	x	x
1.3	Commercial communication for alcoholic beverages shall not create any association between the consumption of such beverages and violent, aggressive or dangerous conduct.	x	x	x	x	x	x	x	x	x	x	x	x
1.4	Commercial communication for alcoholic beverages shall promote responsible consumption of alcoholic beverages and shall not disparage abstinence from such beverages.	x	x	x	x	x	Although the ad does not imply irresponsible 'levels' of consumption, the	x	x	x	x	x	x

							scene starts with one young man showing a bottle he is holding inside an elevator with his friends, on their way to a party. The assumption is that they have full control of how much they can drink from that bottle and it is not 'served' by a third party.						
2	Minors												
2.1	Commercial communication for alcoholic beverages shall neither promote drinking of alcoholic beverages by minors nor show minors in the act of drinking or promoting the drinking of such beverages.	x	x	x	x	x	x	x	x	x	x	x	x

2.2	Commercial communication for alcoholic beverages shall not be conveyed by media the majority of whose editorial content addresses minors.	x	x	x	x	x	x	x	x	x	x	x	x
2.3	Commercial communication for alcoholic beverages shall not make any claim or representation to the effect that minors are not old enough to consume alcoholic beverages and so provoke drinking.	x	x	x	x	x	x	x	x	x	x	x	x
2.4	Commercial communication for alcoholic beverages shall not show persons stating that they drank alcoholic beverages as minors.	x	x	x	x	x	x	x	x	x	x	x	x
2.5	Commercial communication for alcoholic beverages shall neither be shown on sports kits worn by sports teams comprising minors nor be conveyed in advertising and sponsoring campaigns that are directly related to minors.	x	x	x	x	x	x	x	x	x	x	x	x
3.	Sportspersons												
	Commercial communication for alcoholic beverages shall not show athletes drinking or promoting drinking.	x	x	x	x	x	x	x	x	x	x	x	x
4.	Safety												

4. 1	Commercial communication for alcoholic beverages shall not show any person drinking or promoting drinking while driving a vehicle.	x	x	x	x	No drinking while driving, but the ad includes snippets of showing the drink, people having fun, and also enjoying music in the car. It is unclear if they are drinking or have just enjoyed drinking or will be drinking.	x	x	x	x	x	x	x
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4.2	Commercial communication for alcoholic beverages shall not create any association between the consumption of alcoholic beverages and the driving of a vehicle.	x	x	x	x	x	x	x	x	x	x	x	x
4.3	Commercial communication for alcoholic beverages shall not show consumption of alcoholic beverages in situations constituting a breach of safety rules.	x	x	x	x	x	The party-goers are outside.	x	x	x	x	x	x
5.	Health claims												
5.1	Commercial communication for alcoholic beverages shall not make any claim to cure, relieve or prevent any ailment.	x	x	x	x	x	x	x	x	x	x	x	x
5.2	Commercial communication for alcoholic beverages shall not claim that alcoholic beverages have any medicinal effect.	x	x	x	x	x	x	x	x	x	x	x	x
5.3	Commercial communication for alcoholic beverages shall not show persons wearing clothing typical of the healthcare professions, healthcare trades or the pharmaceutical trade.	x	x	x	x	x	x	x	x	x	x	x	x
6.	Alcohol content												
6.1	Commercial communication for alcoholic beverages shall not present high alcohol content as a positive quality of a brand or as a reason to purchase it.	x	x	x	x	x	x	x	x	x	x	x	x
6.2	Commercial communication for alcoholic beverages shall not give the impression that a beverage's low alcohol content prevents abusive consumption.	x	x	x	x	x	x	x	x	x	x	x	x
7.	Anxiety, disinhibition, and conflict												

7.1	Commercial communication for alcoholic beverages shall not make any claim relating to the disinhibiting effect of alcoholic beverages.	x	x	x	x	x	x	x	x	x	x	x	x
7.2	Commercial communication for alcoholic beverages shall not make any claim relating to the elimination or relief of anxiety.	x	The ad shows how the drink creates a good situation from a potentially bad one. A cake that is dropped is made into a new dessert using [spirit 3].	x	x	x	x	x	x	x	x	x	x
7.3	Commercial communication for alcoholic beverages shall not make any claim or representation relating to the elimination or resolution of psycho-social conflicts.	x	as above	x	x	x	x	x	x	x	x	x	x
8.	Performance												
8.1	Commercial communication for alcoholic beverages shall not make any claim relating to improvement of physical performance as a result of consuming alcoholic beverages.	x	x	x	x	x	x	x	x	x	x	x	x

8.2	Commercial communication for alcoholic beverages shall not give the impression that consumption of alcoholic beverages promotes social or sexual success.	x	The ad shows how the drink creates a good situation from a potentially bad one. A cake that is dropped is made into a new dessert using [spirit 3].	x	The ad is centred around the ‘quality’ and ‘sophistication’ of the drink (whisky), and so the actor and setting clearly show the higher social status of the drinker. A direct association is not made but the setting implies that the drink is taken by a wealthy person.	The ad shows people having fun and promotes Cuban culture. This is not directly associated with the drink. However, it does assume that this particular beverage is associated with similar levels of fun and social standing.	x	x	x	x	x	The advertisement centres around an attractive woman who grabs the attention of a man in a bar, while holding the drink. Allusions of a sexual nature are therefore present.	x
9.	Age of depicted individuals												
	Individuals depicted in commercial communication for alcoholic beverages must at minimum be and give the impression of being young adults.	x	x	x	x	x	x	x	x	x	x	x	x

Appendix D: Alcohol producers' responsible marketing policies

Appendix D, Table 1: Overview of responsible marketing policies of selected alcohol producers in television and online media advertising

	Molson Coors	C&C Group plc	AB InBev
Name of policy	Molson Coors Alcohol Responsibility Policy ⁵²	Responsible Drinking ¹²⁶	Commercial Communications Code ¹⁰⁹
Scope	Marketing Sales practices Reducing excessive, irresponsible or under-age drinking	-	The Code applies to all forms of brand marketing or commercial communications for all AB InBev products that carry a beer trade name and/or have a beer taste profile.
Compliance with other national, international or industry policies	We brew the highest quality products, package and label them in accordance with applicable laws and regulations, and market them responsibly.	Member of Portman Group, signed up to UK Public Health Responsibility Deal	Signatory to the WFA Global Principles for self-regulation of online behavioural advertising.
General principles of the policy relating to marketing	Promote our products ethically and responsibly in all of our markets: <ul style="list-style-type: none"> • Advertise and sell our products honestly and in accordance with all applicable laws and regulations, • Follow the letter and spirit of industry self-regulatory codes that are consistent with the Molson Coors commitment to responsibility, • Target our sales and marketing activities to individuals who are at least the legal drinking age (LDA) or age 18, whichever is higher, • Neither condone nor promote drunk driving or drinking before high-risk activities, irresponsible drinking or drinking to intoxication or illegal activity or violence associated with drinking, • Avoid language or images considered to be lewd or indecent based on contemporary standards in the applicable market, • Avoid claims that consumption of our products is necessary for social, sexual, academic or economic success, and 	No independent principles found	All forms of commercial communications involving Anheuser-Busch InBev beer brands shall be ethical, honest and truthful, and must reflect generally accepted contemporary standards of good taste and decency. <ul style="list-style-type: none"> • We will market and promote our beer in a manner that is consistent with responsible consumption. • No AB InBev or AB InBev subsidiary’s marketing will target individuals below the LDA. • Our marketing materials or promotional activities will not portray the act of consumption immediately prior to activities (or in locations) that are potentially hazardous. • We will not promote our beer in a way that claims it can prevent, treat or cure medical conditions. • We will not use high alcohol strength as a positive quality for our brands and our marketing materials or promotional activities should not create any confusion as to the alcohol strength of our products. • Our commercial communications will not imply that consumption of beer is a requirement for social acceptance or professional, educational or financial success or that the consumption of our product enhances sexual capabilities, attractiveness or leads to sexual relations.

	Molson Coors	C&C Group plc	AB InBev
	<ul style="list-style-type: none"> • Neither condone nor promote littering or other improper disposal of packaging or containers. 		
Rules concerning young people	<p>Target our sales and marketing activities to individuals who are at least the legal drinking age (LDA) or age 18, whichever is higher</p>	<p>No mention found</p>	<p>AB InBev’s beer marketing is directed at individuals of LDA and above. In the Code, ‘legal drinking age’ refers to the age by which individuals may lawfully drink or purchase alcohol beverages, whichever is higher. For those countries that have no minimum LDA, it is AB InBev’s policy not to direct its marketing activities to individuals below the age of 18. No AB InBev or AB InBev subsidiary’s marketing will target individuals below the LDA. AB InBev’s commitment to this principle will be supported by the following provisions :</p> <p>I. We will not employ any symbol, image, object, cartoon character, celebrity, music or language that is primarily intended to appeal to children or adolescents.</p> <p>II. All actors and models shown drinking and/or actively promoting our beer in any marketing materials must be at least 25 years old and must reasonably appear to be over the LDA.</p> <ul style="list-style-type: none"> • People involved in promotions for our brands in the on-/off-trade must be LDA or older. <p>III. We will aim to place our marketing materials in media where a minimum of 70% of the audience for that media is reasonably expected to be above the LDA. We recognize that at the time of placement, audience composition is predicted based on past experience.</p> <ul style="list-style-type: none"> • AB InBev will work closely with its agencies and media buyers to predict as accurately as possible that at least 70% of the target audience will be above the LDA. • We will ask our media partners to provide – where available – post-monitoring reports on audience composition at half-yearly intervals to double-check compliance to the highest practical level. <p>IV. We will not sponsor or target our marketing activities at events where the majority of the audience is expected to be below the LDA.</p> <p>V. We will not allow our brand logos or trademarks to be licensed for use on toys, children’s clothing, or on materials or merchandise for use primarily by persons below the LDA.</p> <p>VI. We will take all reasonable steps to ensure that AB InBev-sponsored promotions will not allow sampling for anyone below the LDA. Our promotions staff will be trained to request proof of age and will be directed to</p>

	Molson Coors	C&C Group plc	AB InBev
			refuse to serve samples to under-age individuals. VII. At AB InBev-sponsored events, we will provide for the availability of non-alcohol beverages for those individuals who are either under the LDA or choose not to drink our beer.
Internet and digital media	No mention found	No mention found	All principles of the Commercial Communications Code are applicable to digital media. Websites will restrict access to those of the LDA. Emails will be sent only to those of the LDA. Brand communication will be placed on third-party websites only where at least 70% of the visitors are expected to be above LDA. Content should not primarily appeal to people below the LDA. Downloadable applications should not primarily appeal to people below the legal drinking age. User-generated content, on channels wholly or partly controlled by AB InBev, will be monitored to ensure that it is appropriate and complies with the Commercial Communications Code. Transparency – our marketing communications should not be presented as user-generated content when that is not the case.
Product placement	No mention found	No mention found	Responsible drinking We will not grant permission to use our products or properties if: 1. A character's drinking is not, in our judgment, appropriate, legal or responsible. 2. Alcoholism, illegal under-age drinking, public drunkenness, drunk driving, or other abuse of alcohol is portrayed.
Compliance	All of our business units adopt local policies and procedures that, at a minimum, conform to this Molson Coors policy.	No mention found	Compliance with the Code is mandatory for all our operations. Where national laws, regulations or self-regulatory Codes already exist, these must be respected in addition to the criteria set out in the AB InBev Code.

Appendix D, Table 2: Overview of marketing policies of selected alcohol producers in television and online media advertising – continued

	Tia Maria	Heineken UK (incl Foster's)	Diageo
Name of policy	No information found online and no response received to enquiries	Heineken Responsible Marketing Policy (personal communication)	Diageo Marketing Code ⁸⁸
Scope	No information found online and no response received to enquiries	The policy provides guidance to everyone involved in marketing and selling our products to ensure our commercial communications do not contribute to excessive consumption or misuse. This policy applies to all Heineken UK alcoholic drinks and, when appropriate, the non-alcoholic versions of any alcoholic drinks brand.	<p>This code applies to all activities intended to market our beverage brands. This includes, but is not limited to:</p> <ul style="list-style-type: none"> • Consumer planning and market research • Brand innovation and product development • Brand names and packaging • Trade advertising • Sales materials • Consumer advertising, PR, and relationship marketing • Brand websites, electronic communication and digital media • Product placement and branded entertainment programs • Brand sponsorships • Branded merchandise • Promotional activities in the on-/off-trade • Experiential marketing and events • Cocktail names and drink recipes

	Tia Maria	Heineken UK (incl Foster’s)	Diageo
Compliance with other national, international or industry policies	No information found online and no response received to enquiries	<ul style="list-style-type: none"> • The Portman Group Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks (4th edition) • The Broadcast Committee of Advertising Practice (BCAP) TV Advertising Standards Code • The BCAP Radio Advertising Standards Code • The British Code of Advertising, Sales Promotion and Direct Marketing (the CAP Code) 	Distilled Spirits Council of the United States’ (DISCUS) Code of Responsible Practices for Beverage Alcohol Advertising and Marketing and The Wine Institute’s Code of Advertising Standards.
General principles of the policy relating to marketing	No information found online and no response received to enquiries	<p>We believe that moderate alcohol consumption can play a part in a healthy lifestyle.</p> <p>We believe alcohol producers should have the freedom to market their products in a responsible manner.</p> <p>We have a genuine commitment to responsible marketing.</p> <p>We believe marketing activity aimed at promoting purchase and consumption of our brands is legitimate, provided it complies with our policy.</p> <p>We must observe the spirit as well as the letter of our policy and the individual codes that underpin it.</p> <p>We will play an active role in encouraging trade and consumer awareness of responsible consumption.</p>	<p>Our marketing must: Comply with all applicable laws, regulations and industry codes. Comply with all other relevant Diageo codes and policies.</p> <p>Our marketing must: Always show respect for those who choose to abstain from alcohol.</p> <p>Our marketing must: Be aimed only at adults and never target those younger than the legal purchase age (LPA) for alcohol. Be designed and placed for an adult audience, and never be designed or constructed or placed in a way that appeals primarily to individuals younger than the LPA for alcohol.</p> <p>Our marketing must: Depict and encourage only moderate and responsible drinking. Incorporate responsible drinking reminders and/or initiatives. Never depict, condone or encourage excessive or irresponsible drinking or refer in any favourable manner to the effects of intoxication.</p> <p>Our marketing must: Via packaging, websites, and other appropriate channels, provide clear, factual and neutral information about the alcohol content of our brands and drinks recipes, where permitted by law. Never present high alcohol strength or potency as the dominant theme or principal basis of appeal of any marketing or product innovation. Not imply that lower-strength alcohol beverages may be consumed in ways or situations that may be inappropriate with higher strength beverages.</p>

	Tia Maria	Heineken UK (incl Foster's)	Diageo
			<p>Our marketing must: Only portray drinking occurring in safe and appropriate circumstances. Never portray drinking before or while driving motor vehicles, operating machinery, or any other similar activity or situation.</p> <p>Our marketing must: Not portray or suggest any association with anti-social or illegal behavior. Not portray or suggest any association with violence. Not portray or encourage the consumption of tobacco.</p> <p>Our marketing must: Reflect generally accepted contemporary standards of good taste and decency. Be judged from the perspective of the broader society – locally and globally. Be sensitive to local and cultural variation.</p>
Rules concerning young people	No information found online and no response received to enquiries	<p>9. Commercial communication should not:</p> <p>(a) Be specifically aimed at or have particular appeal to under 18s, nor show anyone who looks under 25 consuming alcoholic beverages, or non-alcoholic versions of alcohol brands.</p> <p>(b) Be placed in or on media directed primarily at under 18s*</p> <p>(c) Promote alcoholic beverages or non-alcoholic versions of alcohol brands in media, events or programmes at which more than 25% of the audience are known to be under 18. All promotional literature must specify that participation is restricted to those over the LPA.</p> <p>(d) Take advantage of the immature or mentally/socially vulnerable.</p> <p>In all cases, avoid communication that is more likely to appeal to under 18s than adults through for example the use of:</p> <p>(i) Imagery or allusion to youth culture;</p> <p>(ii) Designs or marketing techniques which are based on, or resemble, existing characters which are popular in predominantly under 18s culture or newly created design characters, music, colours</p>	<p>a Our marketing must never be designed or constructed in a way that appeals primarily to people younger than the legal purchase age (LPA).</p> <p>(i) 'Primary appeal' to persons younger than LPA may be judged as a special attractiveness to such persons above and beyond the general attractiveness it has for persons older than LPA.</p> <p>b We will not use any image, symbol, language, gesture, music, cartoon character, person, sporting/entertainment celebrity, hero, or promotional prize or gift that appeals primarily to those younger than LPA.</p> <p>c We will not license our brand names, logos, or trademarks for use on children's clothing, toys, games, games equipment, or other materials intended for use primarily by persons younger than LPA.</p> <p>d We will not associate our brands with the attainment of, or 'rites of passage' to, adulthood.</p> <p>e People appearing in our advertising must be over 25</p>

	Tia Maria	Heineken UK (incl Foster’s)	Diageo
		<p>or motifs that allude to such culture;</p> <p>(iii) Endorsements or promotions by personalities, heroes, icons or motifs which predominantly appeal to under 18s (Note: Reference to a TV series or personality primarily appealing to adults might cause a policy breach if that series or personality has a cult following among under 18s);</p> <p>(iv) Photographic images, illustrations, cartoons or caricatures of people who are, or who look as if they are, under 25 years of age;</p> <p>(v) Promotional merchandise – e.g. t-shirts – made in children’s sizes. Sports shirt sponsorships must ensure that unbranded replica shirts are available in children’s sizes on request</p> <p>(vi) Seasonal characters likely to appeal to children such as Father Christmas, Easter Bunny, Snowmen, circus clowns etc</p> <p>*The S&N media and sponsorship buying policy specifies that adults must make up 75% of the target audience.</p>	<p>years or older [sic], and reasonably appear to be and be portrayed as over 25 years or older [sic].</p> <p>(i) People aged between LPA and 25 may be sponsored, and/or appear in PR, event and promotional materials, but not in advertising.</p> <p>f We will place our marketing in communications media and events only where 70% or more of the audience can reasonably be expected to be older than LPA.</p> <p>(i) We will monitor audience composition of media in which we advertise on a regular basis to ensure compliance to the highest practical level.</p> <p>g We will take reasonable steps not to place advertising on any outdoor stationary location in close proximity to schools, except on licensed premises. Care must also be taken when considering locations in proximity to religious buildings or other locations that may be inappropriate given local sensitivities.</p>

	Tia Maria	Heineken UK (incl Foster's)	Diageo
<p>Internet and digital media</p>	<p>No information found online and no response received to enquiries</p>	<p>Care should also be taken to ensure that brand internet sites are designed specifically for adults and are not appealing to under 18s. Take care with the use of chat rooms, SMS messaging or games ensuring that their appeal and use is to those over the LPA.</p> <p>Sites must have a requirement for entry of the user's birth date: with access denied for those entering a date of birth under 18 years. Sites should include responsible drinking messages and links to sites where the user can obtain information on responsible consumption.</p> <p>Sites should include responsible drinking messages and links to the relevant Drinkaware Trust site where the user can obtain information on responsible consumption: for over 18s: www.drinkaware.co.uk, and for under 18s: www.truthaboutbooze.co.uk</p>	<p>h All Diageo brand websites must contain a gateway page which:</p> <ul style="list-style-type: none"> i Requires consumers to input their full date of birth and country of access, affirming they are older than LPA prior to entering; ii Redirects visitors younger than LPA to a social aspect organization site; and iii Contains Nanny Tags that describe the site's content in a format that parental control software is designed to detect. <p>i We will only place our marketing on third-party sites where at least 70% of the visitors to that website are older than LPA. If a third-party website does not meet the 70% requirement, an LPA+ registered user database may be used if available. If the site is not measured, Corporate Relations will determine if the site is appropriate.</p> <p>j Downloadable applications including games, quizzes and widgets are acceptable so long as they avoid primary appeal to those younger than LPA and include an age affirmation mechanism.</p> <p>k Content must be provided in a given format (e.g. music download formats, wall-paper, podcasts) where at least 70% of those who acquire that format are older than LPA.</p> <p>l Email or other relationship marketing outreach must not be sent to any individual younger than LPA.</p> <p>m Mobile device communication including Bluetooth technology and other relationship marketing tools such as send-to-a-friend and e-cards must include age affirmation mechanisms.</p> <p>See the Diageo Digital Code for further guidance.</p>

	Tia Maria	Heineken UK (incl Foster's)	Diageo
Product placement	No information found online and no response received to enquiries	No mention found	
Compliance	No information found online and no response received to enquiries	Employees with responsibility for marketing, promoting or selling our products will receive annual training on this Policy and its implementation. They must also ensure that all external advertising, marketing and PR agencies and related external services are fully aware of this Policy and are in compliance with its requirements.	Compliance with the marketing code is mandatory, and must be an embedded and integral part of the approval process for all marketing activities.

Appendix D, Table 3: Overview of marketing policies of selected alcohol producers in television and online media advertising – continued

	Pernod Ricard	Campari	Heineken International
Name of policy	Pernod Ricard Code for Commercial Communications	Campari Code of Ethics	Rules on Responsible Commercial Communication
Scope	All Pernod Ricard marketing must comply with this Code of Conduct.	This code of ethics (the 'Code'), approved by the Parent Company's Board of Directors and implemented by all Group companies in Italy and abroad, inspires all the Group's activities. The Code applies to the Group's directors, auditors, employees and permanent associates (referred to as the 'Recipients').	All brand advertising and marketing communication to consumers, regardless of the medium used, such as broadcast media, internet (including our promotions on third-party websites), SMS messaging, labeling, merchandising, packaging, print media, point-of-sale material, premiums, promotions, public relations and sponsorships.
Compliance with other national, international or industry policies	Individual affiliates must ensure that their advertising is also in compliance with the relevant national laws or codes. All Commercial Communications must be in keeping with both the letter and the spirit of all national applicable laws, regulations and self-regulatory codes of practice.	For these purposes, the Group, besides complying with current legislation in the countries in which it does business, is a member of advertising selfregulation entities or institutions which pursue the same objectives.	All commercial communication should comply with the letter and spirit of local, regional and national laws, as well as other relevant regulations (for example, TV and cinema advertising, sponsorship and internet regulations).

	Pernod Ricard	Campari	Heineken International
General principles of the policy relating to marketing	<p>Commercial communications should:</p> <ul style="list-style-type: none"> • be legal, decent, honest and truthful and conform to accepted principles of fair competition and good business practice; • be prepared with a due sense of social responsibility and be based on principles of fairness and good faith; • not in any circumstances be unethical or otherwise impugn human dignity and integrity. 	<p>The Group continues to pursue these values and is committed to adopting an advertising policy which respects people’s freedom and dignity with respect for responsible consumption of alcoholic beverages.</p> <p>The Group’s advertising must not encourage excessive and morbid consumption of alcoholic beverages, suggest violent, aggressive or socially dangerous forms of behaviour or imply that alcohol can solve existential or physical problems.</p>	<p>Our commercial communication must:</p> <ul style="list-style-type: none"> • be legal, decent, honest and truthful; conforming to accepted principles of fair competition and good business practice; • be prepared with due regard for our social responsibility and based on principles of fairness and good faith; • never impugn human dignity and integrity or be unethical in any way. <p>Our commercial communication must never:</p> <ul style="list-style-type: none"> • encourage or condone excessive or irresponsible consumption; • present abstinence or moderation in a negative way; • allude to, or suggest any association with, illegal drugs or the drug culture; • feature drunk people or imply in any way that drunkenness is acceptable.
Rules concerning young people	<p>Commercial Communications should:</p> <ul style="list-style-type: none"> • not be aimed at minors nor show minors consuming Beverages; • only promote Beverages in print and broadcast media for which at least 70% of the audience are reasonably expected to be adults 18 years or older; • not promote Beverages in print and broadcast media, or events for which more than 30% of the audience is known or reasonably expected to be minors; • not use models and actors who are not at least 25 years of age; 	<p>The Group undertakes that alcoholic beverages shall not be shown in a way such as to be an appeal for those who are under age.</p> <p>For these purposes, the Group, besides complying with current legislation in the countries in which it does business, is a member of advertising selfregulation entities or institutions which pursue the same objectives.</p>	<p>Our commercial communication must:</p> <ul style="list-style-type: none"> • never target minors (i.e. people younger than 18 years or under the legal purchasing age (LPA), when LPA is higher than 18 years); • only promote beer through media, programs and events where at least 70% of the audience are reasonably expected to be people older than 18 or above LPA (when LPA is higher than 18 years); • feature people who are at least 25 years old and act and appear their age.

	Pernod Ricard	Campari	Heineken International
	<ul style="list-style-type: none"> • not use objects, images, styles, symbols, colors, music and characters (either real or fictitious, including cartoon figures or celebrities such as sporting heroes) of primary appeal to children or adolescents; • not use brand identification such as names, logos, games, game equipment or other items of primary appeal to minors. 		
Internet and digital media	<p>All websites operated by Pernod Ricard, with the exception of those pertaining to corporate financial issues, must carry an age affirmation page (sometimes referred to as an LDA, LPA or AVP page).</p> <p>All websites and other brand owned or sponsored sites (e.g. Facebook pages, Twitter Feeds, Apps etc.) should contain a Responsible Drinking Message (RDM).</p> <p>Paid for space and Pernod Ricard produced editorial or commentary can only appear on sites where at least 70% of the audience is aged 18 or above. In countries where the legal purchase age of alcohol is above this (e.g. in the USA it is 21) then that is the age at which the 70% figure applies.</p> <p>Paid for advertising which has a significant interactive content (e.g. rich media banners with a game element) are likely to require an age affirmation device.</p> <p>Any material designed for sharing, irrespective of where it is placed, must</p>	-	-

	Pernod Ricard	Campari	Heineken International
	<p>carry an appropriate warning that it should not be shared with anyone under the age at which it is legally permitted to purchase alcohol in the country of viewing.</p> <p>All video footage that can be shared or downloaded must carry a beginning frame that carries an age warning 'this material relates to the promotion of alcohol and should not be viewed by anyone below the legal age of alcohol purchase in the country of viewing'.</p> <p>Groups or channels that are run by Pernod Ricard on third-party websites (for example a Facebook Page or a YouTube channel) should wherever possible ensure that all members are aged over LDA. No group or channel should be run by Pernod Ricard or its agents unless the site meets the 70% rule regarding audience profile. Nor should Pernod Ricard engage with any group or channel that does not meet the 70% rule. Where it is not clear that 100% of the viewers are aged over LDA then a notice must be posted that the material shown is only intended for those over legal drinking age.</p> <p>User Generated Content may not be directly uploaded to any Pernod Ricard owned or controlled website (or page) but must be reviewed before it appears (pre-moderated).</p> <p>No images, including any User Generated Content, of anyone who is or appears to be below the age of 18 and involved in drinking alcohol may be</p>		

	Pernod Ricard	Campari	Heineken International
	shown on any site (or part thereof) within Pernod Ricard's control.		
Product placement	<p>The Code of Conduct along with these complementary guidelines apply to the overall sponsorship agreement, including any sponsored event material carrying the sponsor's logo or trademark for the duration of the sponsorship agreement.</p> <p>Pernod Ricard should not engage in sponsorship agreements unless at least 70% of the audience for the event (meaning those attending the event and the audience for broadcast media coverage of the event) are reasonably expected to be 18 years of age or older.</p>		-
Compliance	-	Violations of the Code may result in the termination of the relationship of trust between the Group and the Recipients, with the consequences for the employment/collaboration relationship specified in current legislation and collective agreements.	<p>The instructions set out below should ensure that all Heineken Operating Companies comply with our rules on responsible commercial communication. These rules apply to all brands owned by Heineken group companies. Additional marketing rules are in place for the Heineken and Amstel brands.</p> <p>For all commercial communication, approval should be registered by filling in the commercial communication approval form. Retention of this form is obligatory.</p> <p>In case of any complaints received from (non-)governmental organisations, consumers or official complaint bodies with respect to a particular commercial communication, all related correspondence should be properly stored.</p> <p>All complaints should be registered for audit purposes.</p> <p>In order to keep all employees in your marketing and sales department fully informed about our rules on</p>

	Pernod Ricard	Campari	Heineken International
			responsible commercial communication, refresher courses on these rules should be organised annually.

Appendix E: Social networking site advertising policies

Facebook

Facebook advertising guidelines¹⁰⁶

Alcohol Adverts that promote or reference alcohol are prohibited in the following countries: Afghanistan, Brunei, Bangladesh, Egypt, Gambia, Kuwait, Libya, Norway, Pakistan, Saudi Arabia, United Arab Emirates, Yemen and any other jurisdiction where such adverts are prohibited by law.

Where permissible, adverts that promote or reference alcohol must: (i) Comply with all applicable local laws, required or recommended industry codes, guidelines, licenses and approvals and (ii) apply age and country targeting criteria consistent with Facebook's targeting guidelines and applicable local laws. Where a user's age or country cannot be determined, the advert must not be displayed to the user.

Please refer to the Help Centre for specific guidance for alcohol-related advert content.

Facebook Help Centre: alcoholic beverages¹²⁷

Alcohol

Language:

Alcohol ads and Sponsored Stories may not:

- Include content intended to appeal to anyone younger than the permissible targeted age group or is otherwise associated with youth culture (for example, implying that the consumption of alcohol is fashionable or accepted behavior for those who are under age)
- Portray or be targeted at pregnant or nursing women
- Be untruthful or misleading about alcohol, its use, effects or properties
- Portray people consuming or encourage people to consume alcohol rapidly, in excess, or irresponsibly
- Negatively portray abstinence from alcohol consumption or moderate alcohol consumption negatively

- Portray or promote intoxication or the intoxicating or stimulating effects of alcohol
- Positively portray the strength of an alcoholic beverage
- Portray alcohol consumption as causing or contributing to the achievement of personal, intellectual, business, social, sporting, physical, sexual, or other success
- Portray alcohol as being healthy, offering medical or therapeutic benefits, aiding relaxation, alleviating individual or collective problems, as contributing to or being a sign of maturity, or having other benefits
- Associate the operation of any vehicle or engagement in any sport or potentially hazardous activity as having taken place during or after the consumption of alcohol
- Associate violent, dangerous or antisocial behavior with the consumption of alcohol

Acceptable:

- 'Buy Beer and Wine Joe's Liquor Shop'
- 'Come to the Wine festival for a taste of the magic'

Unacceptable:

- 'Drink to get Drunk'
- 'Under 18 drinking allowed'
- 'Walk of shame last night?'

Targeting:

Subject to all applicable laws, regulations, industry codes, and these guidelines, you may only target alcohol ads and Sponsored Stories to the following age groups:

- 25 years or older in India and Sweden
- 18 years or older in Turkey
- 21 years or older in Cameroon, Micronesia, Palau, Solomon Islands, Sri Lanka and the US
- 20 years or older in Japan, Iceland, Thailand, and Paraguay
- 19 years or older in Canada, Korea, and Nicaragua
- 18 years or older in any other country (excluding those countries specified in Section III.B.i of the Ad Guidelines). Please note the country specific provisions in Finland and Poland. Ads may not contain products or services promoting alcohol greater than 22 per cent by volume if targeted to users in Finland or target users in Poland for any alcohol beverage other than beer.
- Ads and Sponsored Stories may not be targeted to any users (irrespective of age) in Afghanistan, Brunei, Bangladesh, Egypt, Gambia, Kuwait, Libya, Norway, Pakistan, Saudi Arabia, United Arab Emirates, Yemen or any other market where such ads are prohibited.

Facebook platform policies¹⁰⁷

B. Prohibited Content

You agree that you will not promote, or provide content referencing, facilitating, containing or using, the following:

- Alcohol-related content (unless the appropriate Demographic Restrictions are used), or sale of tobacco products, ammunition and/or firearms;

YouTube Alcohol Advertising policy¹⁰⁸

Alcohol advertising

Except for the First Watch ad product, YouTube allows alcohol advertising that promotes the branding of the alcohol with some restrictions (described in more detail below). Alcohol ads can link to a landing page one or two clicks away where users can purchase alcohol online. Campaigns may only target countries where these ads are permissible under applicable laws and regulations and all ads must comply with local restrictions.

Both hard alcohol sales and hard alcohol branding ads must adhere to these below advertising restrictions:

- Ads must be targeted to the appropriate age demographic on YouTube. We may require some alcohol-related content to sit behind an age gate in order to be used in an advertisement.
- Ads/sites cannot imply that drinking can improve sexual, social, or professional standing; that alcohol is relaxing or therapeutic; or indicate that drinking in excess is good.
- Ads/sites cannot show people consuming alcohol; doing anything illegal, violent or dangerous; or be inappropriate in other ways such as degrading to certain groups or minorities or contain sexual content.
- Ads cannot target minors either explicitly or by including endorsements from athletes, cartoon characters, icons/people appealing to minors.

Approved alcohol ad categories with no restrictions

Alcohol-related ads that are approved to run across the site without demo-targeting include:

- Events promoted by alcohol brands as a secondary sponsor. This is different from events organised by alcohol companies as the primary sponsor for the purpose of increasing brand awareness, which requires advanced demo-targeting.
- Wineries, Wine Tours, Sommelier courses with no online sale option
- Brick-and-mortar bars or pubs which do NOT focus on alcohol (there is no direct promotion of drinking and no online sale option)

- Establishments that are not alcohol related (like hotel, restaurant) which mention alcohol
- Alcohol tasting and cocktail making classes
- Cocktail recipes
- Beer, wine, or hard alcohol making kits

Alcohol accessories, including:

- Wine glasses
- Empty bottles
- Beer mugs
- Wine storage
- Alcohol-related collectibles
- Alcohol-related memorabilia
- Packaging and containers (i.e. bottles, decanters, limited edition cans)

Alcohol advertisers who wish to use an age gate on their home page, brand channel and/or video may do so under our age gate policies.