

Charter on Responsible Alcohol Consumption

Third year progress report

November 2008







ABOUT THIS REPORT...

This is the third edition of the European Spirits Organisation – CEPS report on the progress made in implementing the commitments included in its Charter on Responsible Alcohol Consumption adopted in November 2005. Following on from the first and second reports, the objective of this third report is to inform all interested parties of the progress made by the European spirits industry over the past twelve months in implementing the industry's commitments on social responsibility.

The report includes information gathered from 1 August 2007 up until to 31 July 2008. The information contained in the report is provided by member associations of the European Spirits Organisation – CEPS, Social Aspects Organisations (SAOs) and individual spirits producers. It also refers to other sources such as the Drinks Industry Initiatives Brochure 2008 and other sources that are referenced in the report.

As in previous reports, the third report focuses on the main progress across Europe for each of the six Charter commitments and uses national case studies to illustrate good industry practice.

The information contained in the report has received independent assurance from KPMG Sustainability. Their assurance report can be found on page 27.



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Foreword by the President



Working in the European spirits industry for many years now, I had the privilege to experience the momentum generated by discussing and adopting the CEPS Charter on Responsible Alcohol Consumption in 2005. Now, three years after the Charter's adoption, and one year into my term as CEPS President, I am proud to say that this initial momentum has not been lost over time.

The Charter commitments now bind together 32¹ member organisations in 26 EU Member States, plus a group of leading spirits producing companies. Each of these member associations has itself, in most cases, several dozens of company members. Each of our markets, and to a huge extent also our regulatory environments, differ in shape, size and structure. Add to this the task of integrating the self-regulatory and social responsibility activities already in place before autumn 2005 into the Charter framework (for instance, adapting national codes of conduct), and one can grasp the complexity of putting such an undertaking into practice!

In view of this, I am delighted to have seen further progress in implementing the Charter over the past year, and gladly present you this 2008 progress report. We recognise that more needs to be done to meet our ambitious goals, especially in markets where there has hitherto been little or no tradition of self-regulation. Nonetheless, the clear trend emerging since 2005, as well as accelerated and focused assistance provided by the CEPS Secretariat and the European Forum for Responsible Drinking² (EFRD) makes me confident that we are on track to meet the implementation target date of November 2010.

The wide-ranging Charter implementation activities, as well as our industry's constructive and results-oriented participation in the European Commission's Alcohol and Health Forum demonstrate our commitment to be part of the solution, not the problem. It is evident that there is no one single solution, no one-size-fits-all 'quick fix' to reduce the harmful effects of alcohol misuse throughout the European Union. As the next pages show, the European spirits industry is translating its social responsibility commitments into concrete actions, in order to provide innovative solutions adapted to local backgrounds.

I would like to thank all members of the European Spirits Organisation – CEPS for researching and providing the information required for this report. For the third year in a row, the CEPS Secretariat faced the challenging task of compiling and structuring this data, and I sincerely thank them for their great efforts.

I hope that you find this third progress report informative, and would very much appreciate any comments and suggestions you might have on the report.

Brussels, November 2008

Guy Tapernoux
President

¹ The European Spirits Organisation membership comprises 35 national members, including 32 full members and 3 observer associations (Norway, Russia and Switzerland). The latter have not signed the Charter.

² The European Forum for Responsible Drinking (EFRD) is an alliance of leading European spirits producers supporting targeted initiatives to promote responsible drinking. For more information, please see www.efrd.org.



The European Spirits Organisation – CEPS

The European Spirits Organisation – CEPS is the voice of the European spirits industry. Its membership comprises 35 national member associations representing the spirits industry in 29 countries, as well as a group of the leading international spirits companies.

THE OBJECTIVES...

The mission and core objectives of the European Spirits Organisation – CEPS are:

- To promote the responsible consumption of alcoholic beverages;
- To secure appropriate EU legislative conditions for the sustainable production, marketing, distribution and sale of spirits within the EU;
- To secure non-discriminatory treatment of spirits in comparison to other alcoholic beverages;
- To secure free and fair access for EU spirits in third country markets;
- To increase awareness of the EU spirits industry and its vital economic role.

THE STRUCTURE...

› General Assembly:

It is the main decision-making body which endorses the organisation's annual Strategic Plan. The General Assembly consists of all member associations of the organisation with each full member being represented by one or more permanent delegates, who may also be assisted by one or more experts.

› Council:

It is the main managerial arm of the organisation, overseeing implementation of the Strategic Plan. It consists of one representative per member country as well as one member representative for the body of member companies.

› Standing Committees:

There are four issue-focused Standing Committees, including the Standing Committee on Alcohol and Society which is responsible for the day to day implementation of the CEPS Charter on Responsible Alcohol Consumption.



Executive Summary

In its third year, implementation of the 2005 CEPS Charter on Responsible Alcohol Consumption continued in the 26 EU countries where CEPS has national member associations. The past twelve months saw good progress on implementing our commitments, but more work lies ahead in order to reach the November 2010 target date.

Clearly, 26 different market structures and regulatory environments mean different individual departure points on the road to full implementation. The CEPS Secretariat and the European Forum for Responsible Drinking (EFRD) recognised this need for more practical and more focused assistance, not only by providing template guides and toolkits, but also by specifically targeting countries where self-regulation is still a relatively novel idea – for instance with the June 2008 Charter implementation workshop in Budapest. In addition, a new e-learning tool for marketing professionals, <http://www.marketresponsibly.eu> was launched and the EFRD kickstart funding mechanism continued to provide resources for CEPS members with smaller budgets.

Regarding the first Charter commitment on the introduction of Responsible Drinking Messages, these now exist in twenty-one CEPS member countries, while severe advertising restrictions for alcoholic and spirit drinks in the remaining five countries undermine delivery of the commitment. Eight CEPS members have already achieved the agreed target of displaying the message on 75% of their spirits adverts.

The second commitment requires that national codes adhere to the EFRD Common Standards on Commercial Communications³. 15 countries already agreed such new codes or aligned theirs with the Common Standards (up from 13 in 2007), nine have only limited or no codes in place, whereas legal advertising restrictions in two Member States render this commitment inapplicable. The Estonian Alcoholic Beverages Producers Association adopted a code of ethics in March 2008. The Spanish Spirits Association FEBE amended its code of conduct to reflect latest EFRD amendments on the 70/30 advertising rule and the revised minimum age of models (now 25 years), while our Hungarian and Polish members joined their national self-regulatory bodies.

Regarding the commitment on responsible product development, the new EFRD provisions on naming, labelling and packaging entered into force in January 2008.

The fight against underage drinking is the subject of our fourth commitment. Since the last progress report, awareness, information and server training campaigns with industry involvement have been rolled out in four more countries (Belgium, the Czech Republic, Hungary and the Slovak Republic), bringing the total now to 17 out of 26. New initiatives taken over the past twelve months include new information websites in the Netherlands and the Czech Republic, as well as new server training projects in Germany, Hungary, Poland, the Slovak Republic and the UK.

By now, industry-funded campaigns against drink-driving are firmly established in most European countries. In addition to these, two more countries (Belgium and Bulgaria) rolled out new campaigns in the last year, leaving only Cyprus, Estonia, Latvia, Romania, the Slovak Republic and Slovenia without any kind of industry-sponsored campaign. The manifold activities range from participation in EU-level initiatives such as the *European Road Safety Charter*, to rolling out new campaign pilots, such as in Bulgaria or Poland.

Education campaigns (the sixth CEPS commitment) are progressing, with Italy and Poland now increasing the number of countries with industry-funded campaigns in place to 12. The past year saw the development and launch of several new information websites, for instance in the Czech Republic and Spain (several others are currently being developed), and numerous general and issue-specific information campaigns rolled out by CEPS member associations and companies.

³ For an explanation of what is covered by the Common Standards, please see page 9 under Commitment 2 in this report.



Activities of the Organisation to support Members

As in previous years, CEPS has continued to provide support to its membership to help to implement the Charter commitments. This support has become increasingly focused on those markets where the concept of industry self-regulation is less developed and organisations are less well equipped for social responsibility programmes. This is particularly valid for the newer EU Member States.

This support consists of both practical assistance, the exchange of best practice examples and financial support from the European Forum for Responsible Drinking (EFRD) and its members.

› Charter Implementation Seminar June 2008 (Budapest, Hungary)

In the context of the CEPS General Assembly, the European Spirits Organisation – CEPS organised an internal seminar on 11 June on Charter implementation specifically targeting the newer EU Member States. Using, as a basis, recent good practice examples from other new Member States, the seminar sought to help these CEPS members to identify national action needed to implement the CEPS Charter. The seminar was well attended by CEPS member associations, Social Aspects Organisations (SAOs) and company representatives from the Member States being targeted. This seminar was welcomed and considered important by participants in that it helped make clear to new members that, even without the budget and experience which exist in more established Member States, Charter implementation is possible and progressing. It is hoped that the seminar has helped to accelerate the progress already being made in these markets on implementing their Charter commitments.

› EFRD Funding for responsible drinking programmes

For the second year, the EFRD kick-start funding mechanism, started in March 2007, has helped to develop social responsibility programmes in many markets. These achievements are reflected in this report. Again in 2008, this financial support was made available by EFRD to SAOs and CEPS members in order to help them launch responsible drinking programmes. In 2008, funding was provided to Austria (Austrian Spirits Association), Denmark (GODA), Hungary (HAFRAC), Poland (Polish Spirits Association) and Portugal (ANEBE).



› National workshops / visits

In 2008, the CEPS Secretariat continued its bilateral visits to member associations to hold focused discussions on the status of Charter implementation and agree on national plans to implement their commitments. Such meetings have taken place in Bulgaria, Spain and Denmark and will continue over the coming months.



Commitment 1: Responsible Drinking Messages

All European Spirits Organisation – CEPS members agree to promote the responsible consumption of spirit drinks. By 2010, where permitted under national law, 75% of advertising (print including billboards, TV / cinema and website) undertaken by members will include responsible drinking messages. The form, content and size of the communication will be up to individual members to decide, but it must be clearly visible to consumers and it is strongly recommended that these decisions are taken in consultation with relevant national stakeholders.



SUMMARY OF STATUS IN THE PREVIOUS REPORT

The report of last year highlighted the decision of the **Hungarian Spirits Association** and the **Polish Spirits Association** to include Responsible Drinking Messages (RDM) in spirits advertisements.

The report also highlighted the decision of most of the major EU spirits producing companies to include the use of RDMs in their marketing codes. The extent to which these decisions have now been implemented EU-wide and the degree to which these decisions will bring CEPS closer to its 75%⁴ target in some markets, will become clear when CEPS receives the results of its advertising compliance monitoring report in autumn 2008 (see next chapter, “Enforcement” section).

The report also identifies countries where severe restrictions on advertising are in place or health warnings are required by law. Such restrictions obviously undermine this commitment.



SUMMARY OF STATUS IN JULY 2008

Countries where the 75% target is achieved ⁵	Countries where RDMs exist but the 75% target has not been reached	Responsible drinking messages are of limited relevance ⁶	
Belgium France Greece Hungary ⁷ Ireland Portugal Spain United Kingdom ^{7bis}	Austria Bulgaria Cyprus Czech Republic Denmark Germany Italy Luxembourg Malta Poland ⁸ Romania Slovak Republic The Netherlands	Countries where a health warning message is required by law	Countries where severe restrictions on advertising of spirit drinks are in place
		Estonia ⁹ Latvia Sweden	Finland ¹⁰ Slovenia

⁴ The 75% target is calculated in number of advertisements.

⁵ In all these markets, whether by legislation or voluntary agreement, RDMs must be included on all advertising. However, in some cases, existing rules do not yet cover website advertising.

⁶ Restrictive legislation on advertising in these markets means that the relevance of this commitment is undermined.

^{7,7bis} Data from the UK and Hungary shows that RDMs are used on 75% of advertising measured in terms of advertising spend. It is not yet clear whether the 75% target has been reached in terms of number of advertisements.

⁸ In Poland, under the law, only Point of Sale promotions and advertisements in professional publications are allowed for spirit drinks.

⁹ In Estonia, new legislation introduced in March 2008 now requires health warnings on all alcoholic beverages advertising.

¹⁰ In Finland, direct and indirect advertising and sales promotion of alcoholic beverages of over 22% abv is prohibited. Products with an abv between 1.2% and 22% are subject to restrictions on content and placement in all media. Some companies use Responsible Drinking Messages on a voluntary basis (e.g. Altia and V&S Finland).



PROGRESS IN 2007 / 2008

In the **Netherlands**, the new STIVA¹¹ code came into force on 1 July 2008 and includes the obligation for all broadcast commercials and print advertising to include the responsible drinking message agreed by the organisation's members.

Since the adoption of the new code in **Poland**, members' companies locally have committed to include a responsible drinking message on Point-of-Sale (POS) material and professional communications.



CASE STUDY

Spain

Responsibility message

Since its creation the "*Federación Española de Bebidas Espirituosas*" FEBE, the Spanish Spirits Association has considered advertising as an important medium for disseminating messages aimed at encouraging responsible consumption.

Therefore, the advertising Self-Regulation Code, created in 1999, which is applied to all associated spirits companies includes, in a clearly visible format, a message that shows that moderation is a prerequisite for the responsible consumption of spirits. The slogan chosen to accompany advertising campaigns was "*Bebe con moderación. Es tu responsabilidad.*" ("*Drink in moderation. It's your responsibility*"). This slogan was changed in 2008 with the new slogan "*Disfruta de un consumo responsable*" ("*Enjoy responsible drinking*"). All members of FEBE, representing 95% of all spirits advertising in Spain today include the slogan in their advertising campaigns.

Every month all the print and online adverts are checked to certify that they have included the responsible drinking message and also, to measure that the message's size is correct. The responsible drinking message shall be displayed to consumers in a clearly legible format, must be affixed in a clearly visible place and must have a minimum size equivalent to 1% of the total area of the advertisement.

In 2007, the EFRD Report on Advertising Compliance¹² also investigated compliance with the requirement to include Responsible Drinking Messages (RDMs) in Spain and found that the compliance rate stood at 93.6%.



¹¹ Stichting Verantwoord Alcoholgebruik.

¹² The Advertising Compliance Monitoring report covers print and TV adverts, but not internet. It is available at www.efrd.org.



Commitment 2: Codes of Conduct on Marketing of Spirit Drinks

All European Spirits Organisation – CEPS members will ensure that no form of commercial communication about their products should encourage or condone the excessive consumption or misuse of spirit drinks, or, specifically target underage drinkers. All members fully adhere to the principles enshrined in the EFRD Common Standards on Commercial Communications.

These principles cover: Misuse; Underage drinking; Drinking and driving; Hazardous activities, Workplace and recreation; Health aspects; Pregnancy; Alcohol content; Performance; Social success and Sexual success.

All national codes of conduct in all EU Member States should incorporate, as a minimum, the principles laid down in these Common Standards by 2010, taking into account the specificities of existing self-regulation mechanisms. Whilst enforcement of national codes can only be down to national law and practice, systems must exist at the national level to ensure compliance amongst members. Members should also play a role in establishing national systems whereby irresponsible behaviour by non member spirits producers can be condemned or limited.



SUMMARY OF STATUS IN THE PREVIOUS REPORT

In previous reports, CEPS has demonstrated that codes of conduct on marketing are well established in Europe but that situations vary from country to country in the extent to which these codes cover the EFRD Common Standards, as updated in 2005.

It is also important to note that in some EU countries, the marketing of spirit drinks is so heavily regulated that the local industry questions the relevance of adopting a code, for example in Finland and Slovenia.

Of importance was the new comprehensive code adopted by the Polish Spirits Association (PPS) in December 2006.





SUMMARY OF STATUS IN JULY 2008

Countries where national codes of conduct are aligned with the EFRD Common Standards on Commercial Communications ¹³	Countries with a limited code ¹⁴ or no code in place	Countries with severe advertising restrictions in place
Belgium ¹³ Czech Republic ^{13,15} Denmark ¹³ France ¹³ Germany ¹³ Greece ¹³ Hungary ^{13,16} ◀ Ireland Italy ¹³ Poland ¹³ Portugal ¹³ Spain Sweden ¹³ The Netherlands United Kingdom	Austria Bulgaria Cyprus Estonia Latvia Luxembourg Malta Romania Slovak Republic	Finland Slovenia



PROGRESS IN 2007 / 2008

Content

On 8 July 2008, the General Assembly of the **Spanish** Association (FEBE) confirmed the inclusion in its code of provisions on the 70/30 rule¹⁷ and the age of model (now 25 years instead of 23). The Spanish system is now in full compliance with the Common Standards.

In March 2008, the CEPS member association in **Estonia**, Alcoholic Beverages Producers, adopted a code of ethics on the marketing of alcoholic beverages. The code contains basic provisions of the EFRD Common Standards.

In December 2007, the **Hungarian** Spirits Association (HSA) decided to adhere to the self-regulatory code from the national Self-Regulatory Organisation (ÖRT). This code contains a number of provisions concerning the marketing of alcohol. The HSA is now providing input to ÖRT to prepare the next update of the code at which point the extent to which it incorporates all elements of the EFRD Common Standards can be fully assessed. This is foreseen for autumn 2008.

¹³In these countries, only relatively minor changes to their national frameworks appear necessary, to enable them to implement all commitments of the CEPS Charter, most notably, newly revised provisions adopted by EFRD (the 70/30 rule and the minimum age for models depicted in alcohol adverts) are not yet widely implemented in existing national codes.

¹⁴In some countries, a marketing code exists but does only cover a limited number of the EFRD Common Standards provisions. Please see information in Annex 2.

¹⁵The Code of the Czech SAO, Forum PSR, includes almost all provisions of the Common Standards. Membership of Forum PSR includes both the largest local spirits producers and the major spirits importers. However, the code has not been signed by the CEPS member association.

¹⁶When a country is highlighted in green/red with an arrow it indicates that this country has moved column in comparison to the situation in last year's report.

¹⁷Commercial communications should only promote beverages in media for which at least 70% of the audience are reasonably expected to be adults aged 18 years or older. It should 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.

Enforcement

Enforcement is a key element to ensure the functioning and credibility of the self-regulatory system. To enhance this credibility, the **Polish** Spirits Association, PPS, decided in early June 2008 to join the Polish SRO (*Rada Reklamy*) code which also contains provisions on alcohol. However, because PPS has also adopted a comprehensive code, the two organisations are now discussing the best way to ensure enforcement of the provisions of both codes.

Now in its eighth year, the EASA compliance monitoring exercise¹⁸ on code enforcement has continued in 2007/2008 and results will be made available in the autumn 2008. This year it will include TV and print advertising from 19 countries (15 EU countries in 2007). Responsible drinking messages (RDMs) will also be checked.

The **Scotch Whisky Association** launched its Code of Practice for Responsible Marketing and Promotion of Scotch Whisky in 2005. The Code is mandatory on SWA members in the UK and includes a range of sanctions if the Code conditions are breached.



To ensure the spirit as well as the letter of the Code is followed, the Association conducted an audit of its members to assess implementation of the Code in their marketing practices. The audit programme started the second half of 2006 and carried on into 2007. It was completed in December 2007. The audit report and procedures were reviewed by Jack Law, Chief Executive, Alcohol Focus Scotland, who is also Chairman of the SWA Code's Independent Complaints Panel.

The objectives of the audit included:

- To understand how the Code had been communicated and embedded within each member company and carried through to their marketing practices;
- To share best practice across the industry;
- To provide feedback on the Code.

The audit demonstrated that compliance with the requirements of the Code was of the highest order. The audit report draws together the key findings from the audit process to allow best practice to be shared across the industry. Recommendations for improvements to the Code and follow-up are set out in section 4 of the report. A copy of the audit report is available from the SWA's website www.scotch-whisky.org.uk.

¹⁸ Self-Regulatory Organisations (SROs) across Europe, through the European Advertising Standards Alliance (EASA) network review all print and TV adverts from a selected number of countries. Monitoring is undertaken by local SROs which are independent from the alcohol beverage industry.



Training

Providing training and guidance on proper interpretation of codes for marketing professionals is an important element of an efficient self-regulatory system. To support this need for training, EFRD launched in 2008 an e-learning tool, www.marketresponsibly.eu, aimed at marketing professionals, CEPS members associations and self-regulatory bodies.



As part of its monitoring exercise, EASA (the European Advertising Standards Organisation) organised on 16 November 2007 a workshop on the 2007 Monitoring project (see footnote 11). Together with national SROs, EFRD member companies, CEPS members and SAOs, CEPS participated to this one-day training session which included notably a 'stop-light' session as the core element to discuss interpretation of codes.



CASE STUDY:

Belgium

In March 2005, the Belgian Wine and Spirits Association – *La Fédération belge des vins et spiritueux* – signed a code of conduct on the marketing of alcoholic beverages (*Convention en matière de conduite et de publicité des boissons contenant de l'alcool*.) This code was developed in the specific Belgian regulatory environment and defines the rules and principles applying the marketing of all alcoholic beverages.

This document was signed by a wide range of stakeholders, including alcohol producers, the Belgian self-regulatory body, the HORECA sector, representatives from the distribution sector and a consumer organisation. They will all abide by the provisions of the code. This code was endorsed by Belgian legislation in January 2007.

Content

The code contains almost all the principles covered by the EFRD Common Standards. It addresses: misuse, underage, health, drink driving, workplace, alcohol content, performance, social success and sexual success.

To be in full compliance with the provisions agreed under the EFRD Common Standards, two new main rules must be added:

- Commercial Communications should only promote alcoholic drinks in media for which at least 70% of the audience are adults;
- Commercial Communications should only use models who are at least 25 years old.

Naming, Packaging and Labelling provisions are not explicitly mentioned in the Code but they are covered by the broad definition of the term marketing.

The Code also includes a provision to display a Responsible Drinking Message (RDM) on all media channels. For spirit drinks, the message is "*Notre savoir-faire se déguste avec sagesse*"; "*Taste our know-how wisely*"; "*Ons vakmanschap drink je met verstand*"; "*Wir liefern das Know-How, genießen Sie mit Vernunft*". Positioning, character type and size are regulated under the agreement.



Compliance

The Code is enforced by the Belgian Self-Regulatory organisation, *Jury d’Ethique Publicitaire (JEP)*. The JEP was set up in 1974 as an independent self-regulatory body.

The JEP is responsible for the following activities:

- pre-launch copy advice;
- complaints handling (Complaint handling is free of charge and the JEP provides an online complaint form);
- making decisions of the Jury and regular reports available to the public.

Since 1 January 2008, the Belgian complaints jury has been divided into two equal parts representing both the advertising industry and lay experts. The Jury meets once a week.

According to the 2007 EFRD Monitoring report, 95.7% of spirits advertisements are in compliance with the Code.





Commitment 3: Product Development

Experience suggests that the launch of new products may cause particular public scrutiny. In developing new products, European Spirits Organisation – CEPS members undertake to do so in a responsible manner and to apply the same rules and high standards as those applicable to the marketing of existing spirit drinks.



SUMMARY OF STATUS IN THE PREVIOUS REPORT

There are different possible actions to ensure that products are developed and marketed in a responsible manner. The most advanced is the UK retail alert system as described in the 2006 Charter implementation report but the most common is the extension of its voluntary framework for marketing to naming, labelling and packaging as a way to achieve this goal.

Other means such as naming and shaming in press statements and working with local authorities have also been identified (e.g. in Germany; see 2007 Charter implementation report).



SUMMARY OF STATUS IN JULY 2008

Countries where naming, labelling and packaging rules are included in a marketing code	Countries where no provision on naming, labelling and packaging is included in a marketing code	Countries where there is no marketing code
Clearly stated	Denmark Estonia ◀ Germany Greece Hungary ◀ Latvia Portugal Sweden ¹⁹	Bulgaria Cyprus Finland ^{19bis} Luxembourg Romania Slovenia Slovak Republic
Not clearly stated but covered		
Austria Belgium Italy Poland		



PROGRESS IN 2007 / 2008

No other progress has been reported to CEPS on the inclusion of provisions on naming, labelling and packaging in codes.

On 1 January 2008 the new Guidelines on Naming, Labelling and Packaging of the EFRD Common Standards entered into force. The guidelines clarify the implementation of the EFRD Common Standards to the naming, packaging and labelling of pre-packaged alcoholic drinks marketed in the European Union. The guidelines are being implemented by EFRD members and are under consideration by the rest of the CEPS membership.

^{19, 19bis} In these countries, specific restrictions apply for naming, labelling and packaging through the retail monopoly.



Commitment 4: Underage Drinking

European Spirits Organisation – CEPS members support an EU-wide minimum purchasing age for alcoholic beverages. Members will work closely with national authorities in ensuring that minimum purchasing age legislation is enforced, by contributing, for example, to retail and server training schemes and to campaigns to enhance awareness of the legal drinking age, or in their terms and conditions of supply with retail and hospitality outlets.



SUMMARY OF STATUS IN THE PREVIOUS REPORT

The previous reports highlighted some of the existing good practice examples of industry efforts to reduce underage drinking together with a commitment to extend those practices to other EU markets.

These initiatives cover various aspects but mainly focus on the importance of raising the awareness of existing legislation and discouraging underage consumers' access to alcoholic beverages.

The two previous reports also stressed the importance of good cooperation with the retail and hospitality sectors.



SUMMARY OF STATUS IN JULY 2008

Countries where underage drinking discouragement initiatives with spirits industry involvement are in place	Countries where no known initiative is in place
Austria Belgium ◀ Czech Republic ◀ Denmark France Germany Greece Hungary ◀ Ireland Italy Malta Poland Slovak Republic ◀ Spain Sweden The Netherlands United Kingdom	Bulgaria Cyprus Estonia Finland ²⁰ Latvia Luxembourg Portugal Romania Slovenia

²⁰ Significant government campaigns exist in this market and the need for any industry involvement is questioned.





PROGRESS IN 2007 / 2008

In the second Charter implementation report, CEPS mentioned the initiatives that were taken by the spirits industry to prevent ‘flat rate’ or open bar drinking parties. In **Germany**, the member companies of BSI (the Association of German Spirits Producers and Importers) committed to no longer allow their products to be sold in on-trade premises carrying out these irresponsible promotions. Between April 2007 and June 2008, 31 notices for infringement were received by the BSI who subsequently sent out 31 warning letters to the concerned bars and discos. A compliance report was sent to the German Federal Drug Commissioner.

In July 2008, STIVA, the **Dutch** SAO, replaced its slogan ‘alcohol onder 16, nog even niet’²¹ by ‘Alcohol onder 16, natuurlijk niet’ (*alcohol under 16, certainly not*). The new slogan will replace the former one on all advertisements and web material of alcoholic beverages under 15% abv. The slogan “*Geniet, maar drink met mate*” (“*Enjoy, but in moderation*”) is required on 100% of all spirit drinks adverts.

Again in the **Netherlands**, Bacardi launched on 1 December 2007 an initiative aimed at raising awareness of the dangers of underage alcohol consumption. Labels with the slogan ‘Te jong? Geen alcohol!’ (“*Too young? No alcohol!*”) and a website address www.tejonggeenalcohol.nl were put on all 275 ml bottles of Bacardi Breezer. The website provides background information on underage drinking and legal requirements.

In April 2008, the **Czech** SAO, Forum PSR, launched a new website www.pobavme-se-o-alkoholu.cz (Talk about alcohol) to increase knowledge and awareness of the risks associated with underage alcohol consumption and the legal requirements. The website is based on three pillars: an interactive part to be used by young people aged 11 to 16 in their leisure time; work sheets to assist teachers to address alcohol and information and guidance for parents. From April to June 2008, the organisation reported 4,360 visits, 3,083 unique visitors, 37,402 hits and 10.55 minutes spent per visit on average.

Server training initiatives

Starting in October 2007, the **German** member association (BSI) launched “*SchuJu – Schulungsinitiative Jugendschutz*” an education initiative for trainees in the alcohol retail trade and catering industry. The objectives of the initiative are:

- training of bar staff and cashiers to serve/sell alcohol responsibly;
- information about legal protection and age limits for alcohol for children and adolescents;
- providing practical advice of how to put legal age limits into action in the alcohol retail trade, catering industry and service stations to protect children from early and harmful alcohol consumption.
- E-learning, online-test and personalised certificates via e-mail.

The initiative was developed in cooperation with various partner organisations: alcohol retailers and catering organisations, the barkeeper organisation, service station organisations, organisation of teachers at professional schools, and the chambers of commerce and industry. During the reporting period, 293 people attended this programme and 205 have received a certificate. It is expected that the number of participants will significantly increase, notably due to the partnership with the national service station association.

A dedicated website is in place – www.schu-ju.de – for all employees and trainees.

²¹ See CEPS Second Year Charter Report, November 2007, Case study page 20.

In March 2007, the template programme on server training developed by EFRD and the International Center for Alcohol Policies (ICAP) was piloted in **Hungary** (see case study).

The **Polish** Spirits Association, PPS, launched in June 2008 a pilot training programme in the city of Olsztyn to promote responsible serving of alcohol among serving and sales personnel. During the first phase, PPS developed the guide book on 'responsible selling and serving alcohol beverages' in a consultation process with stakeholders. The roll out in terms of the training will start in October 2008.

Spirits producing companies are also taking initiatives aiming at raising awareness amongst on-trade owners and staff on social responsibility obligations and legal requirements. For example, Bacardi Limited launched a new server training initiative in the **Slovak Republic** in 2008.

In partnership with local authorities and other large spirits producing companies, Brown-Forman has initiated the "Best Bar None" initiative. The Best Bar None is an awards scheme for licensed premises. The objective of this initiative is to raise the standard of on-trade operating policies in terms of social responsibility, health and safety and environmental policies. Initiated in Manchester, the campaign has been rolled out in more than 80 cities in the **UK**.



CASE STUDY

Server Training Programme – Pilot in Hungary

1. Development of a template training guide...

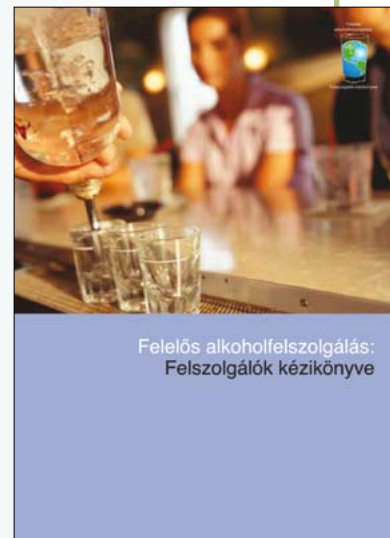
In 2006, the International Center for Alcohol Policies (ICAP) and the European Forum for Responsible Drinking (EFRD) teamed up to commission the development of a Training Guide for hospitality staff in order to promote the responsible service of alcohol and to support the development of national server training programmes across the EU. Developed by Alcohol Focus Scotland (AFS), the "*Responsible Service of Alcohol: A Server's Guide*" and "*Responsible Service of Alcohol: A Trainer's Guide*" provide a framework which can then be translated and adapted to the specific situations for each country. The main aim of these guides is to promote and disseminate server training throughout the EU and to provide a basic tool for training itself.

Following a peer-review process, the final guidance was ready in December 2006.

2. ... piloted in Hungary

In January 2007, the guide was translated into Hungarian and in March 2007, the organisation KIT²² was selected through a call for tender to develop a one day training scheme and organise pilot training sessions.

Between September and October 2007, training sessions involving 109 people in four cities took place. The trainees were asked to fill in a questionnaire before and after the course and a follow-up telephone interview took place five months after training. The teachers were also asked to contribute to the evaluation process. The material consisted of a training book; a Trainers Guide to deliver the course and PowerPoint presentation, video, role play, etc (all available on CD-ROM).



²² KIT is one of the largest national vocational training organisations in Hungary.



The following results are based on 108 answers from 109 trainees:

- 92% were satisfied with the preparation of the training;
- The training course was graded good by the majority (92%);
- The length of the course was graded satisfactory by 81% (19% found the length too long);
- 55% claimed to have used the material since the training took place;
- The CD-ROM was found useful by 70% and a vast majority do not suggest changes;
- Post evaluation on new knowledge: 76% said they learnt something new about licensing law; 85% on alcohol; 90% on creating the right atmosphere; and 84% on people skills;
- Post evaluation on the usefulness of the information to perform their job: 1) 43% very useful on Licensing law; 2) 52% very useful on alcohol; 3) 43% very useful on creating the right atmosphere; 4) 60% very useful on people skills;
- Follow-up after 5 months gave lower results for each learning sections but the need for "people skills" remained at 60%.

Unfortunately, discotheque owners and staff did not participate in this first series of courses. HAFRAC will encourage their participation in the future.

3. Dissemination

The template guides are available free of charge and in several languages from the EFRD & ICAP websites²³.

²³ Please see <http://www.efrd.org>.



Commitment 5: Drinking and Driving

European Spirits Organisation – CEPS members will continue to work with national authorities in ensuring the dangers of drinking and driving are widely communicated, through, for example, supporting drink-drive programmes.



SUMMARY OF STATUS IN THE PREVIOUS REPORT

The main highlight of the 2007 report was that, despite an end to EU funding of designated-driver campaigns, industry funded campaigns continue and increase in most EU countries.

It also demonstrated that major EU spirit drinks companies have developed their own drink-drive awareness campaigns in a number of EU countries.



SUMMARY OF STATUS IN JULY 2008

Countries where campaigns are in place with spirits industry involvement	Countries where campaigns exist but without spirits industry involvement	Countries where no campaign is in place
Austria Belgium Bulgaria Czech Republic Denmark France Germany Hungary Ireland Italy Malta Poland Portugal Spain Sweden The Netherlands United Kingdom	Finland Greece Luxembourg	Cyprus Estonia Latvia Romania Slovak Republic Slovenia



PROGRESS IN 2007 / 2008

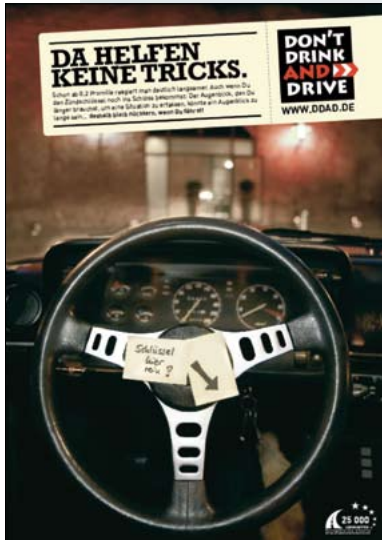
In 2007, the **Bulgarian** Association of Producers, Importers and Traders of Spirit Drinks (APITSD) launched an anti-drink-driving campaign with the financial support of the EFRD kick-start funding mechanism²⁴ (see case study).

In **Poland**, the industry also conducted a number of initiatives. It includes a new pilot initiative, implemented in the city of Lublin aiming at promoting the designated driver concept among 18-30 year olds. The campaign was run from 17 April to 11 May 2008 involving various partners, including the National Road Safety Council. Pre and post-evaluation were carried out. PPS also developed a film on CD called "Experiment". The objective is to increase awareness of the dangers associated with drink-driving among young people and to decrease the number of positive

²⁴ See page 3.



breath tests among young people. In Spring 2008, around 20,000 copies were distributed to high schools, driving schools, police stations and local road traffic institute. In July 2008, PPS rolled out the “Simulator Driving Academy” in 6 major Polish cities. The project offers to participants the opportunity to experience how it is to drive drunk (in 3D). Around 300 persons participated as drivers; 4000 leaflets and 700 posters were distributed.



In 2008, the BSI in **Germany** signed the European Road Safety Charter under which it committed to roll-out the “Don’t drink and drive”²⁵ campaign which promotes the designated driver concept in discos through a peer-to-peer approach until 2011.

In 2007, CEPS members in **Poland** and **Denmark** supported the “European Night without Accident” campaign that took place on the third Saturday of October 2007.

Some times of the year are more crucial to remind people of the message to never drink and drive, most notably Christmas and New Year as well as summer holidays. In **Ireland**, MEAS²⁶, the local Social Aspect Organisation, launched its Christmas & New Year Anti Drink Driving Campaign at the end of November 2007, with this year a new specific focus on the “Morning after” stressing the need for motorists to be aware of how long alcohol can stay in their system if they have been drinking the night before.

In **France**, Entreprise & Prévention, the local SAO, with the support of companies continues to disseminate fixed electronic breathalyser equipment to the on and off trade. The evaluation showed positive results among clients and disco owners. In 2008, the French government announced that all discos and nights pubs should have a fixed breathalyser by January 2009.

Several large spirits producing companies have also invested in anti drink driving campaigns across Europe.

As a commitment to the European Road Safety Charter signed in April 2008, **Bacardi Limited** launched a new campaign “Champions drink responsibly”. Since its launch, the campaign has been rolled out in **Belgium, Germany, Hungary, Italy, the Netherlands** and the **UK**. It consists of a combination of PR, TV, press and poster advertising showing the Formula One Champion, Michael Schumacher, as a role model to set an example and encourage people not to drink and drive.

In November 2007, **Pernod Ricard** introduced three commitments under the EU Road Safety Charter which aim at preventing drink driving among all group employees across Europe and undertook to implement one new awareness raising action per year in different countries to reduce drink-driving.

Started in Summer 2007 **Pernod Ricard Italia** together with **Havana Club International** is rolling out the initiative entitled “*Non guidare, lasciati guidare*” (“Don’t drive, get driven”), providing free buses from night clubs to town centres (in Rome and Milan) and many holiday destinations in Italy, such as the Adriatic and Tyrrhenian coasts.

A campaign designed and launched in 2007 by **Diageo**, “Johnnie Walker Responsible Drinking”, continued in 2008 and was rolled out in **Belgium, Germany** and **Greece**.

²⁵ <http://www.dont-drink-and-drive.de>.

²⁶ Mature Enjoyment of Alcohol in Society - <http://www.meas.ie/>.



CASE STUDY

Bulgaria

Don't drink and drive campaign

In May 2007, the Bulgarian Association of Producers, Importers and Traders of Spirit Drinks launched its first campaign aimed at raising awareness among people of the risk associated with drink driving. This campaign was developed with the support of EFRD.

The activities were held in the city of Plovdiv. The initiative was developed in three stages:

- **May – June 2007:** Collection of data on reported alcohol related traffic accidents for the summer period in 2006, audience survey, number of random controls and analysis as benchmark for the programme.
- **June – August 2007:** Campaign was rolled out, material distributed.
- **September 2007:** Post evaluation campaign and results.

The material was developed with the help of a local advertising agency. All campaign material (flyers, posters, billboards, letterheads, cards) were branded with a logo which says “*What trace would you like to leave behind?*”.

The campaign was also widely publicised through local and national media.

The association involved key local partners, most notably the Regional Police Department of Plovdiv and the Traffic Police of Plovdiv. Both institutions were instrumental in implementing the campaign. In a mutual agreement, the police authorities agreed to distribute campaign material, hand out of prizes (MP3 players) to responsible drivers and collect feedback to allow post campaign evaluation.

In terms of evaluation of the campaign, the local traffic police supplied statistical data on road traffic accidents involving use of alcohol compared with the previous year. It concluded that the campaign had a positive effect on the reduction of the number of road accidents resulting from drink-driving. A post-campaign survey was conducted to collect consumers feedback.

In October 2007, this programme “Don’t Drink and Drive” was nominated in the list for the 2007 Annual Responsible Business Awards of Bulgarian Leaders Forum.





Commitment 6: Education

In order to more effectively encourage the responsible consumption of spirit drinks, 'responsible consumption' must be defined. The European Spirits Organisation – CEPS and its members will work with decision makers and other stakeholders, at the national and, where relevant, EU level in agreeing definitions of sensible and dangerous drinking levels and implementing the wide communication thereof.



SUMMARY OF STATUS IN THE PREVIOUS REPORT

The two previous Charter implementation reports highlighted the different approaches across Europe to better inform consumers about what is meant by sensible drinking. The spirits industry, at trade association or company level, is involved in a wide range of initiatives. These initiatives either provide general information to the public or to targeted audiences such as university students, parents, pregnant women and employees.

Out of all these campaigns, one of the most predominant has been the launch of websites providing consumers with information on responsible drinking and guidance on how to respect those guidelines. In last year's report, CEPS reported such initiatives in Sweden, the UK, Ireland, the Netherlands and France.



SUMMARY OF STATUS IN JULY 2008

Countries where initiatives have spirits industry involvement	Countries where no initiative is known
Belgium Czech Republic Denmark France Germany Ireland Italy Poland ◀ Spain Sweden The Netherlands United Kingdom	Austria Bulgaria Cyprus Estonia Finland Greece Hungary Latvia Luxembourg ▶ Malta Portugal Romania Slovak Republic Slovenia



PROGRESS 2007 / 2008

General Information to the public

Since the last report CEPS has continued to witness the development of national websites seeking to provide information to consumers about responsible drinking and alcohol misuse.



In **Spain**, the www.consumo-responsable.com website was launched in January 2008. The website consists of four sections: knowledge (providing information about alcoholic beverages), understanding (information on the effects of alcohol on the body, sensible drinking guidelines), sharing (myths about alcohol, personal behaviour with alcohol test) and finally a standard drink calculator. Since its launch the website received more than 2000 visits.

In the **Czech Republic**, the local SAO, the Forum PSR, launched its website www.pijsrozumem.cz in December 2007. See case study.

In the meantime, **Austria, Denmark, Hungary, Poland** and **Portugal** have applied for EFRD funding and will receive support to develop similar initiatives in the coming months. The BSI in **Germany** is also working on launching a consumer information website.

To back up this welcome development, CEPS has decided to launch an EU portal website – www.responsibledrinking.eu – providing links to the national responsible drinking websites being developed by members. It will allow members embarking on pan European responsible drinking campaigns or initiatives to be able to refer to one central web address. CEPS is currently developing a website and the aim is to finalise the project by the end of 2008.



In June 2008, FEDERVINI the **Italian** member association commissioned a cinema advert to promote the “Mediterranean style” of moderation. It consists of a sequence of people and situations highlighting the difference between moderation and excess.

From 21-27 October 2007, the first ever Alcohol Awareness Week was organised in **Scotland**. The purpose of the week was to promote an understanding of units of alcohol and learn about responsible drinking. An initiative under the “Partnership Agreement” signed in February 2007 between the Scottish government and the alcohol industry, it brought together government, industry and health stakeholders to promote a common message on responsible drinking. A range of campaign materials were produced to support the week: posters, flyers, tent cards, credit card prompts and unit calculators. During this week, activities took place across the country aimed at challenging people to think about their alcohol consumption and to ask themselves the question ‘Does your drinking add up?’. A toolkit was produced which provided information and guidance to organisations on how they could support the week as was a campaign website (www.alcoholawarenessweek.com). The website saw a total of 6,753 visits between September 2007 and 17 February 2008. The week received wide media coverage. Individuals were exposed to the message on multiple occasions throughout the week. Total opportunities to hear/see the message of the week were estimated to be 16,4 million.

A survey of consumers found 56% of people asked, recalled seeing/hearing about the week without any prompting. A full evaluation report on Alcohol Awareness Week was published in March 2008 and is available from the website. Due to the success of this first Alcohol Awareness Week it was agreed to run it again in 2008.



Education and information campaigns aimed at young people and students

Challenging students to creatively explore the issue of excessive drinking was the objective of the initiative launched by MEAS, the SAO in **Ireland**, in November 2007, **dare2Bdrinkaware**. It consisted of a film competition to produce short films about student's views on the relationship between the Irish culture and drinking and young people's attitudes to alcohol. 2008 marked the first year of the competition, which received a great response from students. The award ceremony took place in April 2008 and the films of the five shortlisted finalists are available on YouTube²⁷.

As in 2007, MEAS in **Ireland**, launched in May 2008 its "Festival Survival Guide" available for free for all participants to the various summer festivals taking place in the country. It will last until September 2008 and will be widely advertised in the media.

In November 2007, **Diageo** launched at European level, the campaign "Choices". The objectives are:

- to reinforce existing responsible behaviour as well as encourage those with risky drinking behaviours to re-evaluate their attitude to misuse;
- to encourage consumers to make informed and sensible decisions about their alcohol consumption.

The campaign is tailored for each market, and includes broadcast, outdoor and print advertising, plus the launch of a website www.thechoiceisyours.com. The campaign was launched in 2007 in the **UK** and **Spain**, and rolled out in **Belgium** and **Germany** in 2008.

In September 2007, MEAS, the **Irish** SAO, launched the "Had Enough" nationwide campaign. The objective of the campaign is to remove the 'social permission' that has been given to drunken behaviour in Ireland. The campaign includes TV, cinema and internet ads, and a series of outdoor posters which illustrate drunken behaviour effect on third parties in various situations.

Pernod Ricard UK has developed the campaign "Accept Responsibility". The campaign draws public attention to self deception and pushes people to accept responsibility for their attitude to alcohol. Running from April 2008 to March 2009, the campaign's first phase addresses the dangers of excessive or inappropriate drinking among young adults.

Targeted information for pregnant women



In **Poland**, the CEPS member association, PPS, developed a new campaign to promote abstinence during pregnancy. The campaign's objective is to inform and educate about the risks associated with alcohol consumption during pregnancy. The initiative is supported by a number of local stakeholders. It consists of various material such as: educational leaflets/brochure for medical personnel; posters to be displayed in clinics, child hospitals, foundations connected with women's and children's health; and media (TV, radio, press) advertising. The campaign will be launched on 1 August 2008.

²⁷ <http://ie.youtube.com/watch?v=dE6-Tj9XDEE>.

In **France**, following the pilot campaign in the city of Le Havre, "Alcohol and Pregnancy, let's talk about it" and the evaluation report in 2007, the campaign is now being run nationwide. The key message of the campaign is zero alcohol during pregnancy and when breast feeding.

Working with health professionals

In 2008, **Moët-Hennessy-Diageo France** launched a pilot programme towards health professionals. The objective of the "Doctors Training Programme" is to raise awareness of doctors on alcohol-related harm and responsible consumption.

The pilot took place from May to June 2008. Prior to the pilot phase, questionnaires were sent to set a benchmark on doctors' knowledge on the issues related to alcohol consumption. The pilot consisted of two online training sessions (16 April and 14 May 2008) with local practitioners. The first session covered social aspects of alcohol and the second, the clinical aspects of alcohol abuse. 2,357 doctors took part in the first session and 1,706 doctors took part in the second. Both sessions were followed by an online evaluation multiple choice questionnaire (QCM) in order to evaluate knowledge improvement as a result of the training session. Over 90% of participants were highly satisfied. 34.02% of pre-training questionnaires were correctly filled. This figure rose to 56.60% post-training. The objective is to roll out the campaign in 2009.

Workplace information for employees

Having an "Employee Alcohol Policy" is one of the initiatives being taken by several spirits producing companies. It provides employees with information about alcohol related issues through internal communication and training sessions. It also aims to better equip employees to communicate the responsible drinking policy.

Pernod Ricard asked, in November 2007, all its EU affiliates to adopt a Code of Conduct, compulsory for all employees and contractors. Adapted to local requirements, the Code provides information on responsible consumption, and pays particular attention to the issue of drink driving and offers assistance and counselling to employees. The Code was adopted for example in June 2008 by Pernod Ricard **Italy**.

In 2008, **Beam Global** distributed to its employees a comprehensive booklet with information on alcohol and responsible consumption.

From January 2008, **Diageo** is rolling out globally its initiative "DRINKIQ". It consists of courses for employees with include sessions in order to engage them on responsible drinking and associated messages.





CASE STUDY

Czech Republic

www.pijsrozumem.cz

On 19 December 2007, the Czech Social Aspect Organisation, FORUM PSR, launched a consumer information website. FORUM PSR was established in 2003 and is responsible for both marketing self-regulation and responsible drinking initiatives. Its members are spirits producing companies.

The objective of this new initiative is to communicate more visibly to consumers about responsible consumption and raise knowledge and awareness about alcohol and its effect on the body.

The content of the website is based on a template text commissioned by CEPS/EFRD in 2007²⁸. The website provides information on what a standard drink is, the effects of alcohol on the body and information relating to different life stages and contexts. It also gives tips and offers the possibility to consumers to test their alcohol consumption.

The launch of the website was accompanied by a press release and interviews with local journalists. Members of FORUM PSR committed to promote it through their own POS materials.

From January to June 2008, FORUM PSR reported 3,353 visits and 16,200 page views.

Evaluation is an integral part of the project. A first phase evaluation was carried out by a team led by Dr. Michal Miovský, Ph.D., who is head of the Centre for Addictology at the Charles University in Prague. The evaluation covers three areas: evaluation of the preparation, evaluation of the process and of the impact. It was published in February 2008.

Overall, the website was considered to contain useful and interesting information, nevertheless the layout was criticised as being “conservative”.

Regarding the impact, 44 people (28 women, 16 men) aged 19-34 took part. They were asked to look at the website and to answer a short questionnaire.

- 18 found that the “what to do when” and information on drink driving sections the most interesting, whereas 21 found the “life stages” the least interesting;
- 27 said that they did not have any idea about how strict the legislation is;
- 19 would welcome more information about assistance in risk situations.

A further detailed evaluation is foreseen in the first half of 2009.



²⁸ The template content was jointly commissioned by CEPS and EFRD and developed by AIM, 'Alcohol in Moderation'. See Charter Second Year progress report, November 2007 (p. 7).



KPMG Assurance Report

To the readers of the CEPS Charter Implementation Report 2008.

Introduction

The management of the European Spirits Organisation (further referred to as "CEPS") has requested us to provide assurance on the information in the CEPS Charter Implementation Report 2008 (further referred to as the "Report"). The Report, including the identification of issues to be reported, is the responsibility of the CEPS management. Our responsibility is to issue an assurance report on the information in the Report.

Context and scope

In the Report CEPS describes its members' efforts and progress in relation to the promotion of responsible alcohol consumption. Our engagement was designed to provide limited assurance as to whether the information in the Report is fairly stated. Procedures performed to obtain limited assurance are aimed at determining the plausibility of information and are less extensive than those performed to obtain reasonable assurance.

Reporting criteria

There are no generally accepted standards for reporting on responsible alcohol consumption. CEPS applies its own internal reporting criteria, being the seven commitments of the CEPS Charter on Responsible Alcohol Consumption. Six commitments have been included in the corresponding chapters of the Report; the seventh commitment relates to the annual progress reporting of the Charter implementation.

Standards

We conducted our engagement in accordance with the International Standard for Assurance Engagements (ISAE 3000): *Assurance Engagements other than Audits or Reviews of Historical Financial Information*, issued by the International Auditing and Assurance Standards Board. This Standard requires, amongst other things, that the members of the assurance team possess the specific knowledge, skills and professional competencies needed to understand and review the information in the Report, and that they comply with the requirements of the IFAC Code of Ethics for Professional Accountants to ensure their independence.

Considerations and limitations

Performance data are subject to inherent limitations given their nature and the methods used for determining, calculating and estimating such data. It is important to view the performance data in the context of the explanatory information provided in the Report's preface ("About this Report...") and the foreword by the President.

Work undertaken

We reviewed the information in The Report, based on:

- a review of the systems and processes used to generate this information;
- a visit to three national member organisations to gain insight into the consistency of the quality of information reported, and into the quality of the reporting controls at CEPS level;
- a review of internal and external documentation and internet sources;
- interviews with CEPS staff;
- a media search for the identification of material issues in relation to the elements of the CEPS Charter on Responsible Alcohol Consumption;



- independent publications on the topic of responsible alcohol consumption;
- an appraisal of The Report in its entirety against available and gained knowledge and understanding of the sector.

Following our review we discussed changes to the draft Report with CEPS, and reviewed the final version of the Report to ensure that it reflected our findings.

Conclusion

Based on the above, the information in the Report does not appear to be unfairly stated.

Commentary

Without affecting the conclusions presented above, we would like to draw the readers' attention to the following:

As appears from the Report, year-on-year progress on the implementation of some of the Charter commitments has been relatively modest compared to the previous year. Furthermore, some of the CEPS members' initiatives aimed at promoting the responsible consumption of alcohol are at a pilot stage and have therefore a limited reach. In order to ensure steady progress towards the full implementation of the Charter by all signatories, notably in relation to the 2010 deadline for the first and the second commitment, we recommend reporting more explicitly about areas for improvement at country level, and about measures aimed at further expanding the reach of existing initiatives.

W.J. Bartels RA

Amstelveen, 25 November 2008
KPMG Sustainability



European Spirits Organisation – CEPS Members

AUSTRIA

- › Fachverband der Nahrungs- und Genussmittelindustrie Österreichs – (FNGO)

BELGIUM

- › Fédération Belge des Vins et Spiritueux asbl – (FBVS) / Belgische Federatie van Wijn en Gedistilleerd vzw - (BFWG)

BULGARIA

- › Association of Producers, Importers and Traders of Spirit Drinks – (APITSD)

CYPRUS

- › Association of Wine & Spirits Producers Cyprus – (AWSPC)

CZECH REPUBLIC

- › Union of the Czech Spirits Producers – (UCSP)

DENMARK

- › Foreningen af Danske Spiritusfabrikanter c/o V&S Danmark A/S – (FDS)

ESTONIA

- › Estonian Alcohol Producers Association

FINLAND

- › Finnish Food and Drink Industries' Federation – (FFDIF) / Finnish Alcoholic Beverages Industries' Association – (FABIA)

FRANCE

- › Bureau National Interprofessionnel du Cognac – (BNIC)
- › Fédération Française des Spiritueux – (FFS)

GERMANY

- › Bundesverband der Deutschen Spirituosen-Industrie und -Importeure e.V. – (BSI)
- › Bundesverband der Obstverschlussbrenner e.V. – (BOVB)

GREECE

- › Federation of Greek Distillates and Spirits – (SEAOP)

HUNGARY

- › Hungarian Spirits Association – (HSA)

IRELAND

- › Irish Spirits Association – (ISA)
- › Irish Whiskey Distillers Association – (IWDA)

ITALY

- › Federazione Italiana Industriali Produttori Esportatori e Importatori di Vini, Acquaviti, Liquori, Sciroppi, Aceti ed Affini – (FEDERVINI)



LATVIA

- › Association of Latvian Spirits Producers and Distributors – (LADRIA)

LUXEMBOURG

- › Fédération Luxembourgeoise des Producteurs de Vin et Spiritueux – (FLPVS)

MALTA

- › The Malta Chamber of Commerce and Enterprise – (TMCCE)

THE NETHERLANDS

- › Commissie Gedistilleerd – (CG)

POLAND

- › Polish Spirits Industry – (PPS)

PORTUGAL

- › Associação dos Comerciantes e Industriais de Bebidas Espirituosas e Vinhos – (ACIBEV)
- › Associação Nacional de Empresas de Bebidas Espirituosas – (ANEBE)

ROMANIA

- › GARANT - Federation of Alcohol Industry and Spirits from Romania – (GARANT)

SLOVAK REPUBLIC

- › Association of Manufacturers of Alcohol and Alcoholic Beverages in Slovakia – (AMAABS)

SLOVENIA

- › Non-Alcoholic and Alcoholic Beverages Association of Slovenia – (NAABAS)

SPAIN

- › Federación Española de Bebidas Espirituosas – (FEBE)
- › Federación de Bodegas del Marco de Jerez – (FEDEJEREZ)

SWEDEN

- › The Swedish Spirits & Wine Suppliers – (SSWS)

UNITED KINGDOM

- › The Gin and Vodka Association of Great Britain – (GVA)
- › The Scotch Whisky Association – (SWA)

EUROPEAN SPIRITS COMPANIES LIAISON GROUP (ESG)

- › Bacardi-Martini Ltd.
- › Brown-Forman Beverages UK Ltd.
- › Davide Campari Milano SpA.
- › Diageo Plc.
- › Jim Beam Brands Worldwide
- › LVMH Hennessy & Co.
- › Pernod Ricard
- › Rémy-Cointreau S.A.
- › V&S Group











Annex to Commitment 1: Responsible Drinking Messages in EU 26¹

Country	Comments
 Austria	Voluntarily applied by some brands.
 Belgium	According to a Convention signed on 12 May 2005 among drinks producers, distributors, the SRO (JEP), etc., any form of advertising (cinema, TV, radio, posters, website) has to bear a responsible drinking message for which the positioning, character type and size have already been defined: <ul style="list-style-type: none"> ▶ Message for beer products: <i>“Une bière brassée avec savoir se déguste avec sagesse”</i> (“Taste our carefully brewed beer wisely”). ▶ Message for other products: <i>“Notre savoir-faire se déguste avec sagesse”</i> (“Taste our know-how wisely”).
 Bulgaria	Voluntarily applied by some brands.
 Cyprus	Voluntarily applied by some brands.
 Czech Republic	Voluntarily applied by some brands.
 Denmark	Voluntarily applied by some brands.
 Estonia	By law, a health warning sentence must appear on advertising.
 Finland	Direct and indirect advertising and sales promotion of alcoholic beverages of over 22% abv is prohibited. Products with an abv between 1.2% and 22% are subject to restrictions on content and placement in all media. Some companies use Responsible Drinking Messages on a voluntary basis (e.g. Altia and V&S Finland).
 France	Since 1991 (Loi Evin), advertising for alcoholic beverages containing more than 1.2% abv ² must include the following message: <i>“L’abus d’alcool est dangereux pour la santé”</i> (“The abuse of alcohol is dangerous for health”). In addition, professional guidelines exist on the position, character type and size of the message and the following words added: <i>“À consommer avec modération”</i> (“Consume in moderation”).
 Germany	Voluntarily applied by some brands.
 Greece	All advertising must carry the <i>“Enjoy responsibly”</i> message.
 Hungary	Since March 2007, members of the Hungarian Spirits Association agreed on a voluntary use of a responsible drinking message <i>“Minőséget, mértékkel”</i> (“Quality not quantity”).
 Ireland	Since 2005 MEAS members (i.e. companies and trade associations) agreed to use the following message: <i>“Enjoy [brand name] sensibly”</i> . Specific guidelines on the positioning, character size and font were agreed.
 Italy	Voluntarily applied by some brands.
 Latvia	By law, a health warning sentence must appear on advertising.
 Luxembourg	Voluntarily applied by some brands.
 Malta	Voluntarily applied by some brands.

¹ Lithuania is the only EU Member State which is not represented in the European Spirits Organisation – CEPS membership.

² Alcohol by volume.




	Country	Comments
	The Netherlands	As from 1 July 2008, the revised STIVA Code requires the use of a responsible drinking message on all broadcast commercials and print advertising: <i>"Geniet, maar drink met mate"</i> (<i>"Enjoy, but in moderation"</i>) is included on 100% of all spirit drinks adverts. STIVA has adopted an additional message for people under 16 years old to encourage them not to drink "www.alcoholonderde16natuurlijkkniet.nl" (<i>"alcohol below 16, certainly not"</i>).
	Poland	The Polish Spirits Association (PPS) code of Marketing Conduct for the Polish Spirits Industry includes a provision that all advertisements, promotional and information materials should contain a responsible drinking message.
	Portugal	Since 2002, all advertising (TV, print, website, excluding radio) should contain the following sentence: <i>"Be responsible. Drink moderately"</i> . The message should be readable.
	Romania	Voluntarily applied by some brands.
	Slovak Republic	Voluntarily applied by some brands.
	Slovenia	Ban on all advertising for spirit drinks.
	Spain	In 2008, members of FEBE adopted a new message: <i>"Disfruta de un consumo responsable"</i> (<i>"Enjoy a responsible drinking"</i>). All members of FEBE, representing 95% of all spirits advertising in Spain should include the new slogan in their advertising campaigns.
	Sweden	Since 2005, all Swedish alcohol advertisements must have one fifth of their space devoted to the health warning message.
	United Kingdom	There is no industry-wide agreement to display responsibility messages on alcohol advertising. The Portman Group (TPG), however, in November 2004, launched a consumer-orientated website, www.drinkaware.co.uk (<u>Management of the site was taken over by the independent Drinkaware Trust from January 2007</u>), which carries comprehensive information on responsible drinking and TPG member companies and others have agreed to promote this website on their advertising. It is estimated that the website address will feature on approximately £150 million pounds worth of advertising over the next 12 months, which is likely to be over 75% of total alcohol advertising spend. There are no guidelines on use other than that it should be of reasonable prominence. Some companies choose to supplement this with a responsible drinking message, the most common being <i>"Please drink responsibly"</i> .

Annex to Commitment 2: Status of Self-Regulation of Advertising for Spirit Drinks

The information provided in this document focuses on three areas of self-regulation for spirit drinks:




- **Self-Regulatory Codes for spirit drinks:** information as to whether there are self-regulation rules in place governing advertising of spirit drinks. When the code owner is a Self-Regulatory Organisation (SRO), this implies the spirits advertising is covered by a specific section of the national self-regulation code. Otherwise the code is owned by the Social Aspects Organisation (SAO) or the CEPS member in that country. This column also provides information on the status of inclusion of the provisions contained in the EFRD Common Standards on Commercial Communications (CS) in the national code, that is, the status of implementation of the CEPS Charter (Charter commitment 2 – codes of conduct on marketing of spirit drinks).
- **Enforcement Mechanism:** information on how the code valid for spirit drinks is being enforced, by which organisation and – in case the organisation is a national self-regulatory organisation (SRO) – what activities they cover.
- **Provisions on Naming, Packaging and Labelling:** are seen as one way to ensure that product development follows the same rules and high standards as those applicable to the marketing of existing spirit drinks. The table below aims to provide information on which countries such rules exist.

Country	Self-Regulatory Code for Spirit Drinks	Enforcement Mechanism	Provisions on Naming, Packaging & Labelling
 Austria	<ul style="list-style-type: none"> › Code owner: Österreichischer Werberat (ÖWR) (SRO). › Some provisions of the CS in place. › Provisions to be added/ amended: hazardous activities, alcohol content, performance, social and sexual success, media threshold for minors, pregnancy and age of models. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaints handling for free 4. Online complaints facility 5. Publication of decision 6. Appeals procedure 7. Stakeholder involvement (jury) 8. Promotional campaign 9. Website 	Not mentioned in the code, but the Code of Procedure for complaints defines advertising in a rather broad sense.





Country	Self-Regulatory Code for Spirit Drinks	Enforcement Mechanism	Provisions on Naming, Packaging & Labelling
Belgium	<ul style="list-style-type: none"> › Code owners: Belgian Government, FBVS and other associations. › All provisions of the CS in place. › Provisions to be amended: media threshold for minors and age of models. 	<ul style="list-style-type: none"> → Code enforced by the SRO (JEP). → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Complaints handling for free 3. Online complaints facility 4. Publication of decisions 5. Appeals procedure 6. Stakeholder involvement (jury) 7. Promotional activity 8. Website 	Not explicitly mentioned but covered by the broad definition of the term marketing in the explanation of the Code's scope.
Bulgaria	No code in place.	No SRO established yet.	No code in place.
Cyprus	No code in place.	No SRO established yet.	No code in place.
Czech Republic	<ul style="list-style-type: none"> › Code owner: Forum PSR (SAO). › The Union of Czech Spirits Producers has not formally subscribed to the Forum PSR code. › Most provisions in place. › Provisions to be amended: media threshold for minors and the age of models. › Provisions to be added: hazardous activities and alcohol content. 	<ul style="list-style-type: none"> → Code enforced by the SRO (RPR). → SRO activities: <ol style="list-style-type: none"> 1. Copy Advice 2. Complaints handling for free 3. Online complaints facility 4. Publication of decisions 5. Appeals procedure 6. Stakeholder involvement (Jury) 7. Website 	Packaging is addressed explicitly in the Forum PSR code.
Denmark	<ul style="list-style-type: none"> › Code owner is the Alcohol Advertising board. › All provisions included. › Provisions to be amended: media threshold for minors and the age of models. 	<ul style="list-style-type: none"> → There is no general dedicated SRO. → The code is enforced by the Alcohol Advertising board. → Activities: <ol style="list-style-type: none"> 1. Complaints handling for free 2. Online complaints facility 3. Website 	Not covered in code.
Estonia	Ethic code (March 2008) in development with basic provisions.	No SRO established.	No code in place.
Finland	Due to the highly restrictive legislative environment, self-regulation is not an important element for alcohol advertising.		





Country	Self-Regulatory Code for Spirit Drinks	Enforcement Mechanism	Provisions on Naming, Packaging & Labelling
 France	<ul style="list-style-type: none"> › Code owners: “Entreprise&Prévention” (SAO) together with sectoral trade associations and the “Autorité de régulation professionnelle de la publicité, ARPP (SRO). › To be added: age threshold of models. › Provisions to be amended: media threshold for minors. 	<ul style="list-style-type: none"> → Code enforced by the SAO. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaint handling for free 4. Online complaint facility 5. Publication of decision 6. Stakeholder involvement (code drafting) 7. Promotional activity 8. Website 	“Entreprise&Prévention” adopted specific guidelines on the naming, packaging and distribution of new products.
 Germany	<ul style="list-style-type: none"> › Code owner: Deutscher Werberat (DW) (SRO). › Almost all CS provisions in place. › Provisions to be amended: media threshold for minors and age of models. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Complaints handling for free 2. Publication of decision 3. Appeals procedure 4. Promotional campaigns 5. Website 	Not covered in the code.
 Greece	<ul style="list-style-type: none"> › The Declaration Plan of Principles and Self-Regulation was signed by the Federation of Greek Distillates & Spirits (SEAOP) and the Association of Drinks Companies (ADC). › Most of the CS provisions included. › Provisions to be added: age threshold of models, pregnancy, alcohol content. › Provisions to be amended: media threshold for minors. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaints handling for free 4. Online complaints facility 5. Publication of decision 6. Appeals procedure 7. Stakeholder involvement (code drafting) 8. Website 	Not covered in the code.












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Hungary	<ul style="list-style-type: none"> › Code owner: “Önszabalyozó Reklam Testület” (ÖRT) (SRO). › The Hungarian Spirits Association (HSA) has subscribed to the ÖRT code. › Most of the key provisions of the CS are included. › Provisions to be added: misuse, age threshold for minors, hazardous activities and pregnancy. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaints handling for free 4. Online complaints facility 5. Publication of decision 6. Appeals procedure 7. Stakeholder involvement (code drafting & jury) 8. Promotional campaigns 9. Website 	Article 1 of the code defines its scope as “business practices towards the consumer in general”.
Ireland	<ul style="list-style-type: none"> › Code owners: the Advertising Standards Authority Ireland (ASAI) (SRO) and MEAS (SAO); the codes are complementary. › The MEAS Code covers, in particular, naming, packaging and promotions in terms of areas not covered explicitly by the SRO code. › All provisions of the CS are in place. 	<ul style="list-style-type: none"> → Code enforced by SRO and SAO (for naming, packaging and promotions). → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaints handling for free 4. Online complaints facility 5. Publication of decision 6. Appeals procedure 7. Stakeholder participation (in code drafting and Jury) 8. Promotional campaigns 9. Website 	Covered in the MEAS Code.



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 Italy	<ul style="list-style-type: none"> › Code owner: "Istituto dell'Auto-disciplina Pubblicitaria" (IAP) (SRO). › Almost all provisions in place. › Provisions to be added: hazardous activities and pregnancy. › Provisions to be amended: age threshold for minors and the age of models. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Complaints handling for free 3. Online complaints facility 4. Publication of decision 5. Appeals procedure 6. Stakeholder participation (in Jury) 7. Promotional campaigns 8. Website 	Naming, packaging and labelling are not specifically mentioned but the term advertising is defined very broadly in the Preliminary and General Rules section of the code.
 Latvia	<ul style="list-style-type: none"> › Code owner: Latvian Spirits Organisation. › Some key provisions of the CS are in place. › Provisions to be added: hazardous activities, pregnancy, alcohol content, sexual success, and the age threshold of models. 	No enforcement mechanism in place.	Not covered in code.
 Luxembourg	No code for alcohol in place.	No SRO established.	
 Malta	<ul style="list-style-type: none"> › Code owner: The Sense Group (SAO). › The Code of Practice for the alcohol industry includes elements of the CS, however this is limited to promotions and naming, packaging and labelling. 	No SRO established.	The code covers naming, packaging and labelling.



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 The Netherlands	<ul style="list-style-type: none"> › Code owner: STIVA (SAO); the code is included into the broad “<i>Nederlandse Reclame</i>” Code of the SRO (SRC – Stichting Reclamecode). › Code includes all provisions of the CS. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Monitoring 2. Complaints handling for free 3. Online complaints facility 4. Publication of decision 5. Appeals procedure 6. Stakeholder participation (in code drafting and in Jury) 7. Promotional campaigns 8. Website 	Naming, packaging and labelling are mentioned under the alcohol beverages specific rules.
 Poland	<ul style="list-style-type: none"> › Code owner: Polish Spirits Industry (PPS). › Code adopted in 2006 includes all provisions of the CS. 	<ul style="list-style-type: none"> → In 2008, the Polish Spirits Industry (PPS) joined the Polish SRO (<i>Rada Reklamy</i>). → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Complaints handling free of charge 3. Online complaints facility 4. Appeals procedure 5. Sanctions 6. Publication of annual complain statistics 7. Website <p>At the moment, the SRO does not fully cover all the items in the PPS code (especially regarding monitoring of advertising relevant for PPS).</p> 	Naming, packaging and labelling are not specifically mentioned but covered under the broad definition of advertising within the code.
 Portugal	<ul style="list-style-type: none"> › Code owner: The Civil Institute of Advertising Self-Regulation (ICAP) (SRO). › Almost all CS provisions are in place. › Provisions to be added: age threshold of models. › Provisions to be amended: threshold for minors. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaints handling for free 4. Online complaints facility 5. Publication of decision 6. Appeals procedure 7. Stakeholder participation (in code drafting and in Jury) 8. Website 	No provision on naming, labelling and packaging.

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 Romania	<ul style="list-style-type: none"> › Code owner: Romanian Advertising Council (RAC-SRO). › There is no formal recognition of this code by the Romanian Spirits Association. › Some CS provisions are in place. › To be added: hazardous activities; health aspects; pregnancy, alcohol content, sexual and social success; media threshold for minors and age of models. 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Monitoring 2. Complaints handling for free 3. Online complaints facility 4. Stakeholder involvement (in code drafting and in Jury) 5. Website 	Not covered by code.
 Slovak Republic	<ul style="list-style-type: none"> › Code owner: Slovak Advertising Standards Council (RPR) (SRO). › There is no formal recognition of this code by the Slovak Spirits Association. › The code includes some elements of the CS. › Provisions to be added and/or amended: are threshold for minors, age of models, alcohol content, health, pregnancy, sexual and social success 	<ul style="list-style-type: none"> → Code enforced by the SRO. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaints handling 4. Online complaints facility 5. Publication of decision 6. Stakeholder involvement (in code drafting and in Jury) 7. Website 	Naming, packaging and labelling are not specifically mentioned but covered under the broad definition of advertising within the code.
 Slovenia	While some self-regulatory elements are in place the legal situation for alcoholic beverages above 15% abv is heavily regulated.	No enforcement mechanism for spirits advertising in place	Not covered.
 Spain	<ul style="list-style-type: none"> › Code owner: “Federación Española de Bebidas Espirituosas” (FEBE). › All CS provisions are in place. › In 2008, FEBE revised its Code to include the CS provisions on age of models and media threshold. 	<ul style="list-style-type: none"> → Code enforced by the SRO (Autocontrol). → SRO activities: <ol style="list-style-type: none"> 1. Copy Advice 2. Complaints handling for free 3. Online complaints facility 4. Publication of decision 5. Appeals procedure 6. Stakeholder involvement (in code drafting and in Jury) 7. Promotional campaigns 8. Website 	Naming, packaging and labelling are not specifically mentioned but covered under the broad definition of advertising within the code.





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Sweden	<ul style="list-style-type: none"> › Self-regulation is limited as extensive regulations apply to advertising of alcoholic drinks. › Code owner: the Swedish Spirits and Wine Suppliers that introduced ethical rules in 2004. › Almost all CS provisions covered. › Provision to be added: age threshold of models. › Provision to be amended: media threshold for minors. 	<ul style="list-style-type: none"> → Code enforced by the SRO (<i>Marknads Etiska Rådet</i>). → SRO activities: <ol style="list-style-type: none"> 1. Complaints handling for free 2. Publication of decision 3. Appeals procedure 4. Stakeholder involvement (in Jury) 5. Website 	
United Kingdom	<p>Code owners:</p> <ul style="list-style-type: none"> › The Advertising Standards Authority (ASA) (SRO). › The Portman Group (TPG) (SAO) regulates naming, packaging and promotions of alcoholic drinks. › The Scotch Whisky Association (SWA) has set up a Code of Practice including key elements of the CS. › All codes include almost all CS provisions and go beyond them (for example, the media threshold 75/25) › Provision to be added: pregnancy. 	<ul style="list-style-type: none"> → Codes are enforced by the SRO, SAO and SWA in relation to its Code. → SRO activities: <ol style="list-style-type: none"> 1. Copy advice 2. Monitoring 3. Complaints handling for free 4. Online complaints facility 5. Publication of decisions 6. Appeals procedure 7. Stakeholder involvement (in code drafting and in Jury) 8. Promotional campaigns 9. Website 	<ul style="list-style-type: none"> → Provisions on naming, packaging and labelling are covered in The Portman Group Code. → Labelling and packaging is explicitly mentioned in the scope and definition of the SWA Code of Practice.

Sources: European Spirits Organisation – CEPS members/ SAOs/ EFRD/ SROs and the European Advertising Standards Alliance (EASA).

Glossary of terms

SRO: Self-Regulatory Organisation: body set up and funded by the advertising industry to apply a code or rules regulating advertising content (for example, see www.easa-alliance.org).

SAO: Social Aspects Organisation: body set up and funded by the drinks industry to promote responsible drinking and to help reduce alcohol-related harm (list available on the EFRD website, see www.efrd.org).

The EFRD Common Standards on Commercial Communications comprise a set of provision for responsible marketing which have been endorsed by the European Spirits Organisation – CEPS as well as additional Guidelines which have not been endorsed so far.





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