

Commercial promotion of drinking in Europe



Key findings of independent monitoring of alcohol marketing in five European countries



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INDEX

1	INTRODUCTION	4
1.1	Effects of alcohol advertising	4
1.2.	Alcohol marketing regulations in European countries	5
1.3	Importance of monitoring alcohol marketing regulations	6
1.4	The AMMIE project	6
1.5	This report	7
2	TRENDS AND INNOVATIONS IN ALCOHOL MARKETING	8
2.1	Introduction	8
2.2	Method	8
2.3	Results	8
2.4	Conclusion	15
3	THE VOLUME OF ALCOHOL ADVERTISING ON TELEVISION	16
3.1	Introduction	16
3.2	Method	17
3.3	Characteristics of the alcohol commercials	17
3.4	Exposure to alcohol advertising	18
3.5.	Thresholds in exposure to alcohol advertising	21
3.6.	Possible effects of a time ban on exposure to alcohol advertising	23
3.7	Conclusion	25
4	ALCOHOL BRANDED SPORT SPONSORSHIP OF TOP CLUBS	26
4.1	Introduction	26
4.2	Methods	26
4.3	Results	26
4.4	Conclusion	29
5	TESTING SELF-REGULATION OF ALCOHOL ADVERTISING IN EUROPE	30
5.1	Introduction	30
5.2	To appeal or not to appeal: Testing content restrictions in self-regulation codes	30
5.3	Testing a proportional standard	34
5.4	Conclusion	34
6	CONCLUSION	36
7	RECOMMENDATIONS	38
8	REFERENCES	40
	Summarizing quotes from the AMMIE report	44

Chapter 1

INTRODUCTION

1.1 Effects of alcohol advertising

The effects of alcohol advertising and marketing on the drinking behaviour of young people has been studied more extensively over the past few years. The evidence base has grown stronger: exposure to large volumes of alcohol advertising has an undesirable impact on drinking behaviour generally and especially on youth. The effect of alcohol advertising and promotion on the drinking behaviour of young people has been found in long term (longitudinal) studies as well as in short term (experimental) studies. The content of alcohol marketing is clearly important. There is a direct link between the exposure to alcohol marketing practices found appealing by young people and an increase in their alcohol consumption.

1.1.1 Effects of the volume of alcohol advertising measured on the long term

Increasing, scientific studies are being conducted that measure the impact exposure to alcohol marketing has on youth drinking behaviour. Recent longitudinal studies found convincing evidence of a causal relationship between the exposure to alcohol marketing practices and the drinking behaviour of young people (Anderson et al., 2009; Smith & Foxcroft, 2009).

Anderson et al. (2009) reviewed thirteen longitudinal studies, mostly conducted in New Zealand, Australia and the United States in which 38.000 youth age 10-21 were followed over time. The studies estimated the exposure to advertising and product promotion in various ways, including estimates of the volume of exposure to the media and advertising, ownership of branded merchandise, recall and receptivity, and expenditures on advertisements. Twelve of the thirteen studies found an impact the exposure to alcohol marketing practices had on subsequent alcohol use, including instigating general as well as heavier drinking amongst existing drinkers. The thirteenth study found an effect on the intention to drink (Pasch et al., 2007). The strength of the impact differed between studies. Yet, that said there is conclusive evidence demonstrated in all studies that there is an association between the exposure to alcohol marketing and the initiation of alcohol use, with increased drinking among existing users.

1.1.2 Effects of the volume of alcohol advertising measured on the short term

Besides the above-mentioned longitudinal studies that have consistently found long-term effects of exposure to alcohol marketing on drinking behaviour, several experimental (lab) studies demonstrate the effect of alcohol advertising on drinking

behaviour in the short term. Behavioural studies conducted at the Radboud University of Nijmegen in The Netherlands found several direct effects exposure to alcohol cues in movies and alcohol commercials had on the drinking behaviour of adolescents. Typically, behavioural studies involve adolescents in their early twenties being invited to the lab in pairs to watch a movie. They have free access to a refrigerator with beer, wine and soda. The participants watch a movie interrupted by commercial breaks. They do not know that their alcohol use and 'sipping behaviour' is being registered as dependent variables.

The findings of such studies indicate that observing alcohol cues on the screen (either in movies or in commercials) directly influences their drinking behaviour (Engels et al., 2009). It is hypothesized that this behaviour is part of an unconscious process of imitation between what is seen on screen and what one does: if the main movie character is portrayed drinking alcohol, the participant (observer) unconsciously 'imitates' their behaviour and takes a sip as well (Koordeman et al., 2011c). This behaviour might very well be influenced by the so called 'mirror neurons' in the brain. The effect seems to be stronger in men – who usually drink more in the first place (Koordeman et al., 2011a; 2011c) and in heavier drinkers (Koordeman et al., 2011b).

1.1.3 Wide support

Taken together, both longitudinal studies (long term effects) as well as experimental studies (short term effects) indicate that exposure to the amount/volume of alcohol advertising and marketing influences youth drinking behaviour. A variety of scientists in the field of behaviour studies, such as associate professor David Jernigan (2006) and professor Peter Anderson (2009), support this conclusion. This finding has also been confirmed by a review of Smith and Foxcroft (2009) and by the Science Group of the Alcohol and Health Forum of the European Commission (2009).

1.1.4 The effect of appealing advertising

Not only do alcohol marketing practices concentrate on showing-off the product, but also on portraying drinking in a cultural context. Branding strategies associate different brands with images of attractive lifestyles and leisure time in the hope

of targeting different groups of users. Marketing is found to indirectly influence alcohol consumption. Indeed exposure to marketing practices results in the consumption of alcohol (Austin, Chen, & Grube, 2006). Desirable images in alcohol advertising has been positively linked to the desire to imitate the advertised images (Austin, et al., 2006; Austin & Knaus, 2000). Moreover research shows that advertisements with appealing imagery increases the amount of alcohol purchased by youth as well as results in an increase in the amount of alcohol consumed by adolescents (Casswell & Zhang, 1998). How appealing youth find the advertisements is directly linked to whether they will purchase the alcohol or not (Casswell & Zhang, 1998). Advertisements use humor, celebrities and animals to make their product attractive to individuals. Commercials that predominantly focus on product qualities result in fewer purchases (Chen, Grube, Bersamin, Waiters, & Keefe, 2005). Alcohol advertisements are perceived as more attractive to those who anticipate social and physical pleasure from alcohol (Proctor, Babor, & Xuan, 2005).

1.2. Alcohol marketing regulations in European countries

There are a variety of both content and volume restrictions in alcohol marketing regulations that aim to protect young people against the harmful effects of alcohol advertisements. Regulations can be embedded by law (legislation or statutory regulation), by voluntary codes of conduct of a company or a sector (self-regulation or non-statutory regulation), or by a combination between state and non-state regulation (co-regulation). An investigation made by STAP, the Dutch Institute for Alcohol Policy (2007; De Bruin, et al., 2010), highlighted the many and varied laws, regulations and administrative provisions on the advertising of alcohol products between European countries. All 23 European countries studied had at least one regulation that covered alcohol marketing and advertising with a total of 74 regulations. Of the 71 regulations, 45 were (partly) fixed by law and 26 were self-regulatory codes. In 2007 the ELSA project revealed that volume restrictions on alcohol advertising are predominantly embedded in (national) statutory regulations, while content restrictions are mostly

found in non-statutory regulations or self-regulatory codes that are created by the alcohol advertisers themselves (see ELSA report; STAP, 2007).

1.3 Importance of monitoring alcohol marketing regulations

In order to ensure the effectiveness of existing alcohol marketing regulations, knowledge of the restrictions and compliance with regulations is key. The need to monitor the compliance of existing alcohol marketing regulations is often mentioned in the literature together with the acknowledgement that there is a general lack of monitoring (e.g. STAP, 2007). The monitoring of alcohol marketing practices should be the responsibility of an independent body or a government agency and should be performed systematically and routinely (Jackson, et al., 2000; Jernigan & Mosher, 2005; Monteiro, 2007). Controls should be developed to identify breaches (Jackson, et al., 2000). Monitoring compliance to regulations needs to be guided by reliable market information that is collected adequately and independently.

Yet, not only is compliance needed, but information on the effectiveness of regulations is both necessary and important as well. Alcohol producers can fully comply with existing codes, but if the codes do not restrict youth exposure to 'harmful' alcohol practices, the regulation is without protective power. Therefore, not only should monitoring be aimed at ensuring compliance with existing regulations but should also cover the volume and content of alcohol marketing practices. These are currently not included in the alcohol marketing regulations.

The AMMIE (Alcohol Marketing Monitoring in Europe) project was the first attempt to systematically and independently monitor the compliance and coverage of alcohol marketing practices from economic interests in Europe.

1.4 The AMMIE project

Started in 2009 and partly funded by the European Commission, the AMMIE project (Alcohol Marketing Monitoring in Europe) consists of NGOs from five

EU countries (Bulgaria, Denmark, Germany, Italy and the Netherlands) that monitored alcohol advertising practices and marketing activities in 2010. Although alcohol marketing is an important topic within the EU Alcohol Strategy (Commission of the European Communities, 2006), alcohol marketing had not yet been monitored systematically and independently from commercial interests in many of the European Member States. During the project a systematic monitoring 'tool' was developed following a method that has been used by the Dutch Institute for Alcohol Policy (STAP). The AMMIE project also investigates the effectiveness of alcohol marketing regulation systems.

The overarching goal of the AMMIE project is to provide insight into the effectiveness of existing alcohol marketing regulations (both legislative and self-regulation) in select European countries. The results of the AMMIE project thus offer insight into the overall presence of alcohol marketing in the five selected countries and describe the content and the amount of alcohol advertising. Special attention is given to the opinion of young people about the attractiveness of alcohol advertising practices and to the amount of exposure to alcohol advertising of young people. Each participating country delivered four country reports that covered the following topics:

- **Trends and innovations with regard to alcohol marketing:** developments in alcohol marketing are monitored and outlined for each country ("Trends in alcohol advertising: report on trends and innovations in alcohol marketing": www.eucam.info/eucam/home/ammie-trends.html).
- **The volume of alcohol advertising on television and exposure to minors:** macro data has been analyzed to examine exposure to alcohol commercials on the three most popular television channels by young people ("Report on youth exposure to alcohol commercials on television in Europe": www.eucam.info/eucam/home/ammie-volume.html).
- **Sport sponsorship by alcohol producers:** auditing the presence of alcohol branded sponsorship of 10 top clubs of the 5 most popular sports in each country. The presence of alcohol branded sport

sponsoring has been examined in over 250 web-sites. (“Alcohol related sports sponsorship: report on sport sponsorship by alcohol producers”: www.eucam.info/eucam/home/ammie-sports-sponsoring.html).

→ **Testing self-regulation: adherence to content and volume restrictions in self-regulation codes:** Effectiveness of content restrictions is based on complaints filed on alcohol advertising coupled with the opinion of youth versus the Advertising Code Committee regarding said advertising practices (summarized in the report “To appeal or not to appeal: testing self-regulation of alcohol advertising”: www.eucam.info/eucam/home/ammie-complaints.html). The effectiveness of volume restrictions is based on the report ‘Youth exposure to alcohol commercials on television’. The results of comprehensive monitoring will allow the European Commission and the Member States of the European Union to improve the existing regulation of alcohol marketing in order to better protect young people against its proven harmful influence.

1.5 This report

The following report provides a comprehensive overview of the results of the monitoring work conducted by the participating NGOs in five European countries. A detailed description of these results, however, has been described in the country reports that are available digitally on the website of the European Centre for Monitoring Alcohol Marketing (EUCAM) (www.eucam.info/eucam/home/ammie.html).

Chapter 2

TRENDS AND INNOVATIONS IN ALCOHOL MARKETING

2.1 Introduction

Alcohol is a homogenous product. Marketing instruments are essential for the industry to distinguish their product from those of the many competitors active in the saturated European market.

Alcohol producers in Europe are naturally very keen to stay on top of any and all developments in the market including developments in alcohol policy. NGOs active in the AMMIE project have monitored trends in alcohol marketing activities during a 15-month period. This chapter describes a selection of recent developments in alcohol marketing in Bulgaria, Denmark, Germany, Italy and the Netherlands.

The alcohol marketing trends in this overview together with others have been described in detail in the country trend reports: reports: "Trends in alcohol advertising: report on trends and innovations in alcohol marketing": www.eucam.info/eucam/home/ammie-trends.html.

2.2 Method

Participating NGOs have monitored alcohol marketing practices over a 15-month period during 2010-2011. During this period data has been

systematically gathered and registered on alcohol marketing practices. Sources include the Ad Library by Nielsen Company. The Ad Library contains a list of newly introduced alcohol marketing practices through different media outlets. These were introduced during fieldwork that consisted of street-level field observations, and internet and magazine searches from the alcohol sector. The content of the marketing practices, their media channel, and marketing strategy have all been evaluated. The key here was to keep eyes and ears open in order to fully understand 'what's happening in alcohol advertising-land'. The findings are not necessarily representative of alcohol marketing in each country, but are rather an indication of new developments and trends.

2.3 Results

Selections of trends in alcohol marketing practices provided in this overview describe developments in media channels (developments in outdoor advertising), content of advertisements (connections and partnerships with rock music), new products (alcohol free beer) or packaging and target groups (targeting women).



Figure 1: Outdoor advertising Copenhagen (2010)

2.3.1 Rock Music Partnerships

Alcohol-branded sponsorship of sport, cultural and music events is an often used marketing instrument by the alcohol industry and subsequently has been described as a marketing trend in all countries. The Danish country report highlighted that alcohol-branded sponsorship of music events is hardly a new trend in Denmark. However, what is new is the change in the relationship. Close cooperation can now be found between alcohol advertisers and the rock bands themselves in the form of working relationships or even partnerships. This is indeed a new trend.

This type of sponsorship exposes a large number of youth to alcohol marketing. Alcohol is connected to music and concerts that youth really enjoy. A recent scientific study suggests that partnerships between musicians and alcohol producers increase youth alcohol use (Primack, et al., 2011).

Partnership between Royal Unibrew and the rock band Kashmir

In 2010 Royal Unibrew entered a wide scale partnership with the Danish rock band Kashmir. The alcohol producer launched a competition for upcoming Danish bands. The winner received the honor of supporting Kashmir on their tour in the fall of 2010. Royal Beer had temporarily changed its website title from "royalbeer.dk" to "royalbeer.tv." Though still a website, it had adopted a more interactive look giving the allusion of being some sort of TV-channel. One is met by a large photo of Kashmir when entering the site on-line where the band members are sitting comfortably in armchairs in a space that resembles a TV studio.

The photo is actually a video where the band members urge young musicians to send in a music video and take part in the competition. Next to the video there is a text in capital letters saying: "THE CHASE OF KASHMIR'S SUPPORT BAND IS ON. IT IS GOING TO BE FIERCE!"

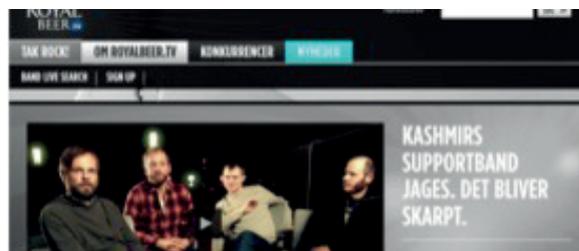


Figure 2: Internet advertisement

600 band names

This site demonstrates that in the search for new talent, Royal Beer not only provides an interactive forum for new bands, but a lot of support for young, up-coming musicians. Indeed, already 600 bands have signed-up for the competition on the website. Photos of every band along with the song they submitted for the competition are posted on-line.



Figure 3

An interactive forum has been set up so that people can comment on the band and their music and share it on Facebook and Twitter.

In this partnership the alcohol industry is borrowing rock-band like qualities. The Marketing Manager in Royal Unibrew states: "We wanted to apply some edge to our brand. Kashmir has got authenticity, soul and credibility – values which we wanted for ourselves. (...) (Urban, 2011).

Royal Beer on your mobile phone

An Android phone with the Friday Rock application provides the user with access to rock music from the Tivoli amusement park. This is also an alcohol-

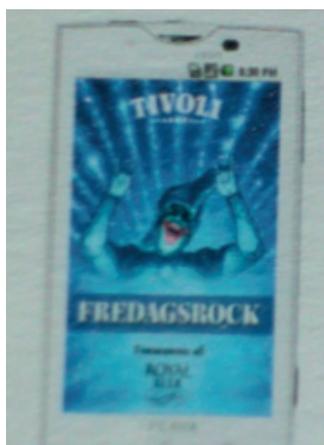


Figure 4

marketing tool given that Royal Beer is the sponsor of this arrangement.

In 2010 not only did Royal Beer form a partnership with the rock band Kashmir, but Diageo, another liquor giant, formed a partnership with the popular Danish rock band, Nephew. Currently, Diageo sponsors Nephews' after parties (Urban, 2011).

2.3.2 Alcohol billboards covering buildings

In Bulgarian cities, due to higher prices charged by municipalities, a smaller number of outdoor advertising have been found compared to previous years. However, when found, they are more pronounced than ever. New technologies, such as illuminations on the facades of buildings at night in which moving images are projected in very large sizes, make the advertisements visible from a large distance. Moreover advertising posters that span and thus hide

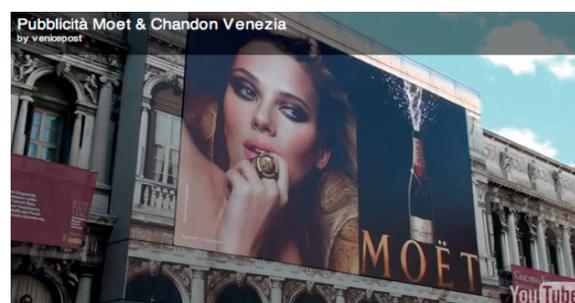


Figure 6: Source: www.venicepost.it/news/publicita-moet-chandon-venezia.html

entire facades of residential buildings can be found in Bulgarian cities.

Italy also uses enormous-sized outdoor alcohol advertisements. In 2010 a debate ensued about large Italian and multinational companies sponsoring the restoration of Italian historical monuments. In a time of financial crisis economic operators recognized an advertisement opportunity where they could maximize on high visibility with relatively low expenditures. Alcohol producers have not missed the occasion to use this strategy to promote their products: in September 2010 a Moët & Chandon billboard practically covered the whole historical Venetian palace in San Marco square, as they were contributing to its restoration.

2.3.3 Packaging of alcoholic products as a marketing instrument

Both in Italy and Germany, packaging is mentioned as an important marketing strategy. Colours, shapes and materials used in promoting alcoholic beverages are powerful tools that have an impact on and attract consumers. This marketing channel, however, is often not covered under existing alcohol marketing regulations. For example, the German

Figure 5: A billboard in front of the National Palace of Culture, Sofia.



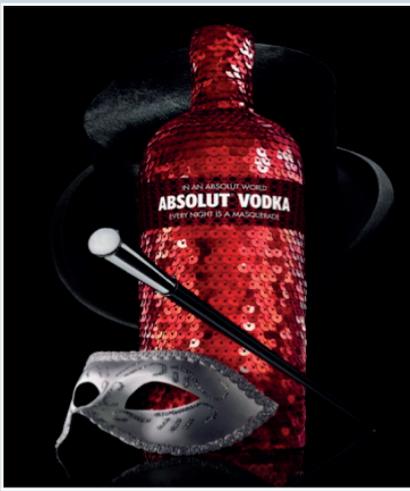


Figure 7:
www.absolut.com/products/masquerade



Figure 8:
www.absolut.com/products/rockedition



Figure 9: Beer for Christmas

Examples from Italy show that alcohol producers try to attract customers by creating special packaging associated to special events.

Advertising Standards Council and producers, who receive complaints referring to the inadequate and unacceptable naming and packaging of their products, have refused such complaints arguing, that naming and packaging was not a field of intervention for the Council, or that the complaints could not be upheld as the naming and packaging of the products used were not meant for sales promotion.

Examples from Germany show that some producers try to attract customers by putting their products in more extreme packaging. A large

number of German alcohol producers favor lurid packaging to attract the attention of young people, for whom specific themes are of special interest due to their age. Product names such as "Kalte Muschi", "Popsy", "Kleiner Flutscher" allude to sexual themes and are appealing to youngsters because of their childish and gross association with "Affenkotze" (monkey puke) or "Mäusepisse" (mice pee). Equally producers use product packaging in shape of bottoms (see figure 12), sperm cells (see figure 13), or testicles to make their brand even more eye-catching.

Figure 10: Heineken 5 litre container



Figure 11: Martini mini size



Figure 12



Figure 13



Also size (Heineken 5 litre big container or Martini mini size 60 ml) seems to be a distinctive element for packaging.

As noted above, German producers are free to develop extreme and sexually oriented packaging because the German Advertising Committee does not view packaging as marketing. Therefore packaging is not covered under the German regulatory code.

2.3.4 Targeting women

A clear trend of the past few years has been alcohol marketing targeted specifically towards women. In a 2007 interview, Heineken stated that “Sales amongst women should increase” (NRC, 11th April 2007). Every year, new products are marketed that are particularly appealing to (young) women. However, women are more vulnerable to the harmful effects of alcohol than men. For example, their risk of breast cancer increases with every glass of alcohol that is consumed (see WCRF/AICR Expert Report, 2007). Although there is still a lack of robust evidence linking alcohol consumption to cancer (Eurobarometer 72.3, 2010), a recent study showed that girls who drank more frequently and consumed higher amounts of alcohol as adolescents, had an increased risk of developing benign breast cancer in their twenties (Berkey et al., 2010). For this and other reasons, alcohol marketing that specifically targets women poses a risk for their health. Examples of new product and marketing activity targeting (young) women that were addressed in the Italian and Dutch country reports are discussed below.

“Link the taste of beer to the drinking moment”

Women who were asked what their favourite alcoholic beverage is, 62% indicated wine, 15% indicated mix drinks and only 7% selected beer (AdFundum, December 2010). Generally women do not drink beer because of the bitter taste and the thinking that drinking beer results in weight gain. However, in total approximately 30% of Dutch women do drink beer (versus 76% of men) (AdF, Dec. 2010). According to UK beer expert Melissa Cole: “it is important not to teach women in how to drink beer. They decide for themselves what they want to drink. For the beer industry it is important to inform women about the beer product and about the diversity in beer tastes”. It is also important to communicate that different types of beer are enjoyed at different occasions. This is done through the development of special packaging designed just for women (e.g. the Heineken Slimcan in the Netherlands).

The Heineken Slimcan

Heineken has developed a special ‘slim can’ for women. The slim can is described as ‘elegant’ and ‘trendy’ and is slightly smaller than a regular-sized can that typically contains 33cl versus the slim can that contains 25 cl of beer. In 2010 the Heineken slim can was introduced in the supermarkets. The pay-off: “one glance and you’re sold” [“één blik en je bent verkocht”], in which glance [‘blik’] has a double meaning in Dutch (meaning ‘can’ and ‘glance’ at the same time).



Figure 14: Heineken ‘slim can’.

In the advertisement, one can visit the Heineken website and “win a feminine Heineken gift package worth 100 euros” (figure 14).

As previously noted, since 2007 Heineken has invested in developing ways to increase the consumption of beer among women. It is the objective of the slim can to assist in meeting this goal. Historically, only one out of ten women drinks special beers. But with the advent of special beers in the Netherlands, such as rosé beer, one in six women now drink special beers. Indeed the diversity of special beers coupled with the good quality has resulted in increased consumption by women (DelixL.nl).

Flavoured Beers were also mentioned in the **German country report** as a trend of the past few years. With these flavoured Beers, alcohol producers aim to reach the same market as alcopops but circumvent the special tax on these drinks.



Figure 15: Hello Kitty wine



Figure 16: Heineken lip gloss

Another method for introducing new products to women is by associating the alcoholic beverage with accessories. Examples of this trend include jewellery on Hello Kitty wines bottles (figure 15) or Heineken beer sold with lip gloss (from Italy) (figure 16). Additionally, advertisements link alcoholic beverages with special occasions such as Valentine's Day or female parties to attract female consumers.

Coebergh D'amour

"Celebrate love with Coebergh d'Amour" is how the new Coebergh cocktail is promoted in the Netherlands (figure 17). "This sensual red love mix is fresh and fruity and might contain the most important ingredient to conquer a woman's heart: dark chocolate. Chocolate contains fenylethylamine, which is also released when someone is in love. It induces a euphoric feeling. Surprise a loved one with Coebergh d'Amour or celebrate this day of love with your friends in the enjoyment of this cocktail" (AFD, Jan 2010).



Figure 17

Bols "love cocktail"

Bols created a special cocktail to celebrate Valentine's Day (figure 18). Its main ingredients include Bols genever, Pomegranate liquor and juice, and lemon juice. It was advertised that if one came up with an original name for the cocktail, one could win a tour through the House of Bols Cocktail & Genever Experience and participate in a cocktail workshop.



Figure 18

Canei "completely arranged Ladies Party"

Miazo developed a Dutch brand activation site and campaign to promote the wine brand Canei. Besides a party calendar and music, the website offers the possibility to check codes and upload photos. By uploading a picture displaying your favourite "Canei moment" you could win a "completely arranged Ladies Party" for you and ten of your friends. The campaign consisted of 500.000 bottles sold in stores with neck tags hung around Canei bottles. Each neck tag had a unique code. Online there were banners and a Social Media Campaign on Hyves (the 'Dutch' Facebook). Here, Canei set up a microsite, page skin, gadget, and a branded hyves page. Miazo also developed and localized an international portal to promote the sparkling wine Canei worldwide (www.miazo.com).



Figure 19: Your favourite Canei Moment. Upload a picture of your favourite Canei Moment and win a 'completely arranged Ladies Party' with Canei wine.

2.3.5 Comeback of alcohol free beer

As the [Dutch](#) and [Italian country reports](#) note, 2010 was the year of alcohol free beer coupled with the introduction of alcohol with lower alcohol volumes.



Figure 20: Bavaria 0.0% White

In the Netherlands, Bavaria introduced a new alcohol-free beer called "Bavaria 0.0% White". Bavaria calls its beer '0.0%' rather than 'malt' because of the negative connotation associated with alcohol-free beer in the Netherlands (AFD, May).

Before the launch of Bavaria 0.0% White, the market share of alcohol free beer was approximately 1,5% (AFD, May 2010). Between 2003-2008 the sales of alcohol free beer increased by 50% in Western Europe. The fastest growing markets are Germany (+ 65%), Spain (+54%) and the UK (+55%). In Spain almost one out of every ten beers that was sold in 2008 was alcohol-free.

'Alcohol-free' beer to circumvent regulation?

Although the introduction of alcohol-free beer can be seen as a positive development given that less alcohol is consumed, there are still reasons to be concerned about this trend (by 2011 more alcohol producers have followed Bavaria). Indeed, alcohol producers use their alcohol-free products to circumvent regulation in order to market their original (alcohol) brands to groups they are otherwise not allowed to reach through regular alcohol advertising. Below some examples are provided.

Bavaria 0.0% broadcast on television within watershed

2010 was the first year in which the legal ban on radio and TV between 6.00-21.00 came into force.



Figure 21: Bavaria 0.0% commercial

As it happens, the ban was violated 84 times by 'regular' alcohol commercials (Nielsen Media, 2010). Bavaria broadcast 215 commercials for its alcohol-free White and Malt beer within the watershed. According to the Advertising Code Committee as well as the Directorate for the Media, Bavaria broke the law by doing this because the Bavaria 0.0% White commercial was also clearly promoting its Bavaria beer that contains alcohol during the same commercial. The broadcaster (not the brewer) **was fined € 35.000 for violating the new Media Law** (with broadcasting commercials for Bavaria 0.0% and Heineken Champions League break bumpers).

Supermarket tastings

The Dutch Alcohol and Catering Law ban tastings for alcoholic beverages in a supermarket. However, since Bavaria 0.0% White is alcohol free, Bavaria was allowed to organize supermarket tastings. The brewer succeeded in 'circumventing' the existing Dutch legislation through advertising its alcohol-free product.



Figure 22: Supermarket tasting

At the same time Bavaria is promoting its alcohol-free brand, Bavaria is also able to advertise its brand more generally to everyone, including a younger target audience.

Targeting pregnant women

Bavaria also circumvents regulation with its alcohol-free product through its targeting of pregnant women. Indeed, two mini cans of Bavaria 0.0% beer can be found in the so-called “Happy Box” [“Blije Doos”] for expectant mothers. This prenatal gift box can be obtained for free and



Figure 23

contains information and products for pregnant women and their expectant baby. According to the self-regulatory Advertising Code for Alcoholic Beverages (not legislation): “Advertising messages for alcoholic beverages shall not be aimed specifically at pregnant women”. Introducing an alcohol-free product allows the Bavaria brand to promote it to pregnant women.

Health claims?

Though this has yet to happen, there is concern that brewers will promote the health benefit to drinking alcohol-free beer: no alcohol means fewer calories (between 26-30 kcal per 100 ml; AdFundum, May 2011). EU and Dutch regulations do not allow health claims to be made in the advertising of alcoholic beverages. However, since Bavaria 0.0% White is a non-alcoholic beer, carrying the name of an obvious alcohol brand, it is unclear how, for example, the Advertising Code Committee will respond to health claims made. In an interview with AdFundum (June/July 2010), Bavaria director Peer Swinkels commented on alcohol and health: “Your health benefits by pure products from nature. And beer is one of these.

It is made of natural ingredients, but many consumers do not realize this. With moderate consumption – that is two beers a day for men and one for women – beer fits perfectly within a healthy lifestyle” (AdFundum, June/July 2010).

2.4 Conclusion

The examples provided in this chapter do not aim to provide a representative overview of all the trends concerning alcohol and alcohol marketing in Europe. However, they illustrate new developments within the sector and above all, show how the alcohol industry responds to market and policy developments. When more stringent alcohol regulatory policy measures are introduced, the industry responds by developing innovative marketing tools to circumvent existing regulation. This was clearly the case after the German government introduced a special tax on alcopops in 2004. To counter the special tax, the alcohol industry introduced new (sweet) flavored beers instead. When alcohol marketing becomes more restricted, the industry responds by making use of marketing tools that are not (yet) covered by regulation.

Chapter 3

THE VOLUME OF ALCOHOL ADVERTISING ON TELEVISION

3.1 Introduction

Increasingly, the evidence indicates that not only does exposure to content matter, but in fact the volume of alcohol advertising has an (undesirable) impact on the drinking behaviour of youth. The effect of alcohol advertising has been found in both the long term (longitudinal studies; see Anderson et al., 2009 and Smith & Foxcroft, 2009 for reviews) and the short term (experimental studies, see e.g. Engels et al., 2009; Koordeman et al., 2011a; 2011b; 2011c).

The present summary focuses on the exposure of underage youth to alcohol advertising on television in five European countries, Bulgaria, Denmark, Germany, Italy and the Netherlands in 2010.

Detailed analyses have been reported in the country reports: "Report on youth exposure to alcohol commercials on television in Europe": www.eucam.info/eucam/home/ammie-volume.html.

Countries studied differ in terms of televised alcohol advertising restrictions. Table 1 provides an overview of the televised alcohol advertising restrictions that are currently in place in the five participating AMMIE countries. Of the five countries, Bulgaria, Italy and the Netherlands have one or more statutory regulations.

Most regulations consist of a partial time ban, a specific ban on the advertising of spirits (Bulgaria) or a combination of both. Two countries (Denmark and Germany) have no statutory regulations restricting the volume of alcohol advertising. This report focused on the so-called 25% or 30% threshold when analyzing each country's self-regulatory practices regarding the volume of advertising allowed. The 25% or 30% threshold regulation aims to prevent alcohol advertising from specifically targeting minors. This means that alcohol advertising is not allowed if the audience consists of more than 25% (the Netherlands) or 30% (Bulgaria and Denmark) of minors. This regulatory threshold is absent in Germany and Italy. At the European level, however, the spirits producers organized in the EFRD have a regulatory code with a similar threshold of 30% (EFRD 2009). Most members of the Brewers of Europe and the wine sector acknowledge a 50-50 standard (Gordon et al., 2009).

Table 1 – Overview of alcohol advertising volume restrictions in the five EU countries

Type of regulation	Type of volume restriction	Bulgaria	Denmark	Germany	Italy	Netherlands
Statutory	Time ban	No indirect advertising < 22.00	No ban	No ban	No spirits advertising between 16.00-19.00 (sponsorship still allowed)	No advertising between 06.00-21.00 (sponsorship still allowed)
	Product ban	Ban on direct spirits advertising; No indirect spirits advertising < 22.00	No ban	No ban	idem	No ban
Self-Regulation	Percentage threshold	30% (Nov 2010)	30% (Nov 2010)	No threshold	No threshold	25%

3.2 Method

Data on alcohol commercials was obtained from Nielsen Media.¹ The data covered the Top 3 TV channels watched most by youth between the age of 13 – 17 that were allowed to broadcast alcohol advertisements between May and October 2010. Based on this selection, analyses was done on the characteristics of the data, the exposure of certain age groups, the adherence to the audience thresholds and finally, the possible effects of the implementation of a stricter (self-regulatory) percentage threshold or (an extension of the existing) watershed.

The analyses performed by all AMMIE countries followed a specially developed protocol and all analyses and results were reviewed by the Dutch Institute for Alcohol Policy and the Johns Hopkins Bloomberg School of Public Health resp. Virtual Media Resources, Inc., Natick, Massachusetts in the United States. Below, the findings of the analyses are summarized.

3.3 Characteristics of the alcohol commercials

3.3.1 Number of alcohol commercials on television

In the period between May and October 2010 a total of 11.122 alcohol commercials were broadcasted in the five countries studied. Germany aired the most advertisements (N = 3.321) with the Netherlands (N = 1.573) advertising the least broadcast. Bulgaria (N=2119), Denmark (N=2318) and Italy (N=1891) lay in between. In all countries, the number of alcohol commercials on television was higher in May than in October. A closer look at the data reveals that on average, Saturday and Sunday are the most popular days of the week to broadcast alcohol commercials. The occurrence of alcohol commercials peaks at certain times of the day. A minor peak occurs around lunchtime and a high peak occurs between 20.00h and 1.00h. Between the peak hours of 20.00-1.00, Bulgaria broadcast 48% of its alcohol advertising, Denmark 51%, Germany 68%, Italy 42% and in the Netherlands 94%.²

Between the five countries there was vast variation in the degree of alcohol advertising on late night TV. Bulgaria, Germany and the Netherlands broadcast a very small percentage of their alcohol advertisements after 01.00 (1-6% of total advertising). In Denmark and Italy these numbers are 34% and 20% of total advertising respectively.³

² However, no Dutch data were available between 2.00-6.00. Probably small numbers of ads have been broadcast during these late night hours.

³ For the exact number of alcohol commercials per hour of the day see the country reports.

¹ Audience groups in the five countries differed slightly. Please see the country reports for more details.

3.3.2 Number of alcohol ads per product category

Out of all alcoholic beverages, beer is the most advertised product in Bulgaria, Germany, Italy and the Netherlands (56-91% of all advertising per country, 59% on average). Denmark is an exception where 42% of all alcohol advertising is for spirits and only 28% for beer. Bulgaria has the lowest percentage for the advertising of spirits (only 2% of all commercials). This is most likely due to the current time and product bans for spirits.

3.3.3 Number of ads per alcohol producer and brand

A total of 70 different producers of alcoholic beverages were active in May and October 2010 in the five participating countries. Together they accounted for 134 different brands being advertised in 11.122 different commercials. The five largest producers, each with a 'market share' of at least 5% of the broadcast commercials (within the five selected countries), make up for 38% of the total number of commercials. No producers were found to be broadcasting in all countries.

Heineken was active in three of the five countries (Bulgaria, Italy and the Netherlands) and was the producer broadcasting the most ads in the five countries. Heineken accounted for 10% (N = 1.131 ads) of the total 'market share' of all producers. The second largest producers were Diageo and Carlsberg both responsible for 9% of all broadcast ads (N = 990 resp. N = 949) and active in four respectively three countries.

3.4 Exposure to alcohol advertising

3.4.1 Advertising amongst minors

The total number of times a minor was exposed to an alcohol commercial in the selected period on the Top 3 channels was over 36 million in Bulgaria, about 10 million in Denmark, over 610 million in Germany, over 260 million in Italy and over 54 million in the Netherlands. In other words, in the Netherlands e.g. 54 million times a minor saw an alcohol ad on television in May and October 2010 (this number is an underestimation because only data of three channels were bought). This means that in May and October of 2010 in the five countries at least 970 million times a minor saw an advertisement for alcohol.

3.4.2 Differences in exposure per age group

In the aggregate, the numbers mentioned above do not tell us anything about the 'average number' of alcohol commercials someone from a specific age group was exposed to between May and October 2010. In order to calculate this, GRPs are introduced. GRPs take the size of the different age groups into account, which allow us to say something about the average exposure per group. In the five countries, a minor was exposed at least 970 million times to an alcohol advertisement. Taking into account that circa 22 million minors live in the five countries, we are able to conclude that an average of 44 advertisements were seen by one minor between May and October, 2010.

3.4.3 Youth overexposure: GRP ratios

When comparing youth exposure to alcohol advertising relative to the exposure of (young) adults, we focus on the 'at-risk' group (age 12-17 in the Netherlands and 13-17 in the other countries), who are just starting to drink alcohol and are therefore more vulnerable to the effects of alcohol advertising.

In order to calculate a GRP ratio of possible 'youth overexposure', we divide the total number of GRPs of the 'at-risk' group, by the total number of GRPs of the comparison group (e.g. young adults or the entire adult population (18+)). If the ratio equals 1, both minors and (young) adults are exposed to an equal amount of advertising. If the ratio is larger than 1, this means that youth are relatively overexposed to alcohol advertising compared to (young) adults.

Table 2 shows that both GRP ratios for all countries are lower than 1. This indicates that adolescents are not exposed to more alcohol advertising per capita compared to adults. Adolescents in Denmark are exposed to 65% of the exposure of adults (18+) and 65% of the exposure of young adults. In Germany these numbers are 92% and 67% respectively. In other words, for every 10 alcohol ads seen by (young) adults in Germany, adolescents see 7 to 9 alcohol ads.

Table 2 – Comparing the exposure of different age groups to alcohol advertisements in May and October 2010

Groups compared		BU	DK	GE	IT	NL
at risk / total adults	GRP Ratio	0,57	0,65	0,92	0,81	0,71
	% Overexposing ads	21,7%	29,1%	42,2%	35,0%	27,0%
	% Exposure from overexposure	37,2%	52,4%	66,7%	54,2%	44,3%
at risk / young adults	GRP Ratio	0,85	0,65	0,67	0,97	0,78
	% Overexposing ads	31,8%	23,7%	15,2%	37,0%	30,5%
	% Exposure from overexposure	57,9%	38,6%	21,9%	59,9%	48,5%

*GRP ratio = Gross Rating Points ratio: the total number of GRPs for age group 12-17 divided by the total number of GRPs for the age group 18+ resp. 18-34. A GRP ratio > 1 is an indication that youth are being exposed to more advertising per capita than (young) adults. *Source: Nielsen, 2010.*

3.4.4 Percentage of youth overexposure

Although the GRP ratios are below 1, the data shows that within the five selected countries, in approximately 15% to 42% of the 11.122 alcohol commercials, adolescents were relatively overexposed compared to adults (that is, more minors were reached in relation to the size of their own age group, compared with adults in relation to the size of their age group; per capita youth saw more alcohol advertisements than adults). In 27% of all Dutch commercials broadcast, relatively more adolescents were reached compared with adults (18+). In Italy it is 35%. Table 2 compares adolescent and adult exposure and shows that adolescents are more exposed to alcohol commercials than adults. The percentage of exposure was slightly higher when youth were compared with young adults aged 18-34. Indeed 12-17 year olds were exposed to 31% of the commercials. (see Table 2).

3.4.5 Percentage of youth exposure resulting from overexposing ads

When the total number of GRPs generated by the overexposed ads is divided by the total number of GRPs for adolescents, it becomes clear that over the five selected countries, one- to two-thirds (37-67%) of the total exposure to alcohol advertising amongst adolescents comes from overexposure

to advertisements: where, per capita, youth are already more exposure to alcohol commercials compared to adults (see Table 2).

3.4.6 Differences in exposure for different types of alcohol

Not only is it important to ascertain the percentage of youth exposed to alcohol commercials, it is equally important to investigate whether certain types of beverages appeal more to youth than adults. Table 3 indicates that the highest GRP ratio was found for sweet beverages in Germany (GRP ratio = 1,13), This means that for every 10 ads an adult saw, a German youth was exposed to 11 ads. Interestingly a variety of beverages in Germany score a ratio of over 0,92 (when comparing at-risk youth to adults). This means that youth are exposed to an almost equal number of alcohol commercials advertising each type of drink as adults. The same outcome holds for Italy (except for wine), but only when comparing at-risk youth to young adults. When examining the percentage of exposure to advertisements by product categories, we find that there are substantial differences between countries. For example, 20% of all beer advertisements in Bulgaria reach more young people in the at-risk category than adults.

In Germany this is over twice as much (43%). In the latter, we can conclude that two out of three beer advertisements (67%), to which young people in Germany are exposed to, consist of beer advertisements.

A category where youth are already overexposed compared to adults. For sweet beverage advertisements, this is three out of four (74%).

Table 3 – Exposure per product category

		BU		DK		GE		IT		NL	
Category		at risk/ total adults	at risk/ young adults								
Beer	Ratio	0,53	0,83	0,57	0,65	0,91	0,67	0,89	1,02	0,68	0,77
	% Overexposing ads	20,0%	31,0%	27,2%	23,2%	42,7%	14,6%	39,5%	39,8%	24,9%	29,6%
	% Exposure from overexposure	33,3%	57,1%	39,1%	36,4%	67,4%	22,3%	58,7%	63,2%	40,8%	45,1%
Wine	Ratio	0,81	0,91	0,47	0,56	0,91	0,64	0,63	0,8	0,41	0,89
	% Overexposing ads	2,5%	37,3%	21,5%	21,0%	39,4%	12,0%	19,0%	28,1%	0,0%	50,0%
	% Exposure from overexposure	56,1%	61,5%	44,3%	37,7%	63,6%	19,4%	38,3%	47,1%	0,0%	69,6%
(sweet) beverages <15%*	Ratio	0	0	0,74	0,66	1,13	0,67	0,74	0,92	0,73	0,81
	% Overexposing ads	0,0%	0,0%	37,7%	26,8%	48,0%	15,0%	31,7%	32,3%	32,6%	33,1%
	% Exposure from overexposure	0,0%	0,0%	58,4%	32,9%	73,8%	17,3%	49,2%	54,1%	48,3%	53,4%
Spirits	Ratio	0,78	0,89	1,03	0,74	0,95	0,76	0,67	0,96	0,77	0,81
	% Overexposing ads	2,5%	34,4%	27,8%	23,1%	43,8%	27,2%	29,9%	38,9%	29,5%	31,1%
	% Exposure from overexposure	51,6%	60,8%	79,9%	57,2%	62,5%	32,8%	47,1%	60,0%	50,4%	52,9%
Total	Ratio	0,57	0,85	0,65	0,65	0,92	0,67	0,81	0,97	0,71	0,78
	% Overexposing ads	21,7%	31,8%	29,1%	23,7%	42,2%	15,2%	35,0%	37,0%	27,0%	30,5%
	% Exposure from overexposure	37,2%	57,9%	52,4%	38,6%	66,7%	21,9%	54,2%	59,9%	44,3%	48,5%

Note: The number of ads in these two months is based on the Top 3 TV channels most often watched by 13-17 year olds (NL: 12-17 yr olds). Therefore, the total number of ads in these months is in fact higher than depicted here. *This category comprises: Vermouth, Cider, Alcopops and/or other (sweet) alcoholic beverages < 15%. GRPs = Gross Rating Points; a standard to measure per capita exposure to advertising. GRPs are the number of exposures within a certain age group divided by the number of possible viewers (television universe) within this same age group *100. Numbers in red indicate that more than half of the exposure results from overexposing ads where youth receive more exposure on a per capita basis compared with adults. Source: Nielsen, 2010.

3.5 Thresholds in exposure to alcohol advertising

3.5.1 Existing thresholds

Many European alcohol producers and/or advertisers have included a measure in their regulatory code that is meant to prevent large numbers of minors from exposure to alcohol advertising. All thresholds concerning the five countries are set at 30% and have a national and/or European baseline (EFRD, 2009). Only the Netherlands has a national regulatory code, consisting of a 25% threshold.

3.5.2 Violations of the threshold

In order to examine whether the 30% threshold (in the Netherlands 25% threshold) was complied with, the percentage of minor viewers was calculated from the total number of viewers of the particular program (including the alcohol commercial broadcast during this program). Table 4 shows that violations to the regulatory code during the period of May and October 2010 have been found in every country, except for Germany.

Table 4 – Number of violations of the 30%* threshold in May and October 2010

	BU	DK	IT	NL
violations	17	427	10	56
brands	9/25	24/30	5/23	17/20
channel	bTV Action (PRO.BG) - 41%	MTV - 63%	canale 5 - 0%	RTL 4 - 0%
	Diema Family- 35%	TV 2 - 18%	Italia 1 - 100%	RTL 5 - 96%
	Nova - 24%	TV3 - 19%	rai 1 - 0%	SBS 6 - 4%

Table 4: The number of violations of the 30%-threshold in May and Oct 2010 per channel. * For the Netherlands a 25% threshold is taken. The number of violations is based on data from the Top 3 TV channels most often watched by 13-17 year olds (NL 12-17 year olds). Therefore, the total number of violations in these months will probably be higher than depicted here. *Source: Nielsen , 2010.*

3.5.3 Percentages versus Absolute numbers

In the practice the 30% or 25% threshold does not seem to be able to protect large numbers of minors from being protected against alcohol advertising. In Table 5, some examples from the Netherlands of this particular 'problem' are presented. In the country reports, similar examples from other countries are presented.

Table 5 – Comparing percentages with absolute numbers

Brand	Program	% of viewers aged 6-17	N aged 6-17	GRP 6-17
Jillz	Example 1 – late night drama	76,0%	9.889	0,4
Havana Club	Example 2 – late night drama	52,7%	3.956	0,2
Grolsch	Example 3 – late night reality	33,0%	7.587	0,3
Hertog Jan	Example 4 – Prime time comedy	31,8%	105.305	4,4
Heineken	Example 5: Prime time spel show	15,4%	362.244	15,2
Strongbow Gold	Example 6: Primetime sports	8,0%	193.755	8,1

Table 5: These are six examples of violations of the 25% threshold that occurred in May and Oct 2010. The total number of violations encountered was 56 (Note: Since the data only comprises the Top 3 TV channels most often watched by 12-17 year olds, the total number of violations in these months will probably be higher).
Source: Nielsen Media and SKO, 2010.

Table 5 shows that an audience composition standard alone may still permit large numbers of youth to be exposed. For example, a Primetime sports program may expose almost 200,000 youth to alcohol ads even though the proportion of the audience aged 6-17 is only 8%. On the other hand, a late-night drama program may have a highly concentrated youth audience even though the size of the audience is small. Theoretically, comprehensive protection of youth from exposure to alcohol advertising may require a truly proportional audience composition standard in combination with an audience volume restriction. This proportional standard, however, should be implemented by law and strictly be monitored and enforced in order to be effective.

3.5.4 A more ‘proportional’ threshold

The 30% threshold is based on the U.S. population, which consists of more minors than the European populations. Therefore, the threshold will be more productive as a regulation if the current threshold is adjusted to a lower standard that realistically corresponds with the composition of the European population.

This argument was also put forward by the NGOs participating in the Task Force Marketing organized within the European Alcohol and Health Forum (European Commission - DG SANCO, 2008). Not only is it necessary to ensure the regulation is with merit, it simply makes sense to adjust the standard so that it targets those minors who are ‘overexposed’ and run the risk of underage drinking (CAMY, 2005). Out of all minors, it is the 13-17 year-olds who are exposed to more than two thirds of all alcohol advertising. In the EU-27 6,6% of the population fall under this category, therefore the recommended EU threshold is 7%. When taking the whole composition of at-risk youth who watch TV in the five countries into consideration, in order to realistically prevent at-risk youth from overexposure to alcohol advertising on TV, a percentage of 6% should be applied in Bulgaria and Germany, 8% in Denmark and the Netherlands, and 5% in Italy. Figure 1 shows the relative change in GRPs for 13-17 year-olds (in NL 12-17) when applying the new proportional standards coupled with alcohol advertisers complying with the intervention.

In this calculation, we assume that alcohol advertisers would change their advertising patterns after the introduction of a new proportional standard to compensate for the adult GRPs lost by this new intervention. Figure 1 shows that the introduction of a new proportional standard would be most effective in protecting youth in Germany where youth exposure will decrease by 48%. In Bulgaria the proportional standard would be the least effective where it will only decrease youth exposure by 25%.

3.6 Possible effects of a time ban on exposure to alcohol advertising

3.6.1 Shifts in GRPs after introducing a time ban

An overview of time bans on television, made by the Dutch Institute for Alcohol Policy (STAP, 2009), reveals that a large majority of EU countries has implemented a legal watershed on alcohol advertising. A total of 21 out of 27 EU Member States has a partial or complete ban on alcohol advertising on television (e.g. time and/or product bans).

With the present data we can also try to estimate what the shift in GRPs could be if a certain time ban would come into force. Figure 2 shows what the possible effects of different time bans (e.g. until 22h, 23h etc.) could be on youth exposure (13-17 year olds), assuming that the advertisers find ways to at least make up for the loss in adult GRPs. It is highly likely that these shifts in alcohol advertising will occur after the introduction of a watershed. As an example we can refer to the recent situation in the Netherlands. The watershed of 6.00-21.00 resulted in a shift of the broadcasting of alcohol commercials on television. All commercials that were usually broadcast before 21.00 are now being broadcast after 21.00h and even more (Nielsen Media, 2010; Van Dalen, 2011).

The results show that after compensating for loss in adult GRPs, time bans will have different effects in different countries. It shows that in Bulgaria time bans will have an unexpected negative effect when assuming advertisers will compensate for loss in adult GRPs. Even a watershed from 6 am till 1 am will increase youth exposure to alcohol commercials when compensated for adult loss after 1 am with 58%. In all other countries a restrictive time ban till 1 am will decrease youth exposure to alcohol commercials. In Germany and the Netherlands, all types of time bans will decrease youth exposure to alcohol commercials even when controlled for loss in adult GRPs. However, considering alcohol advertisers will broadcast more alcohol commercials after the time slot, there is the danger that young people might be overexposed at late hours.

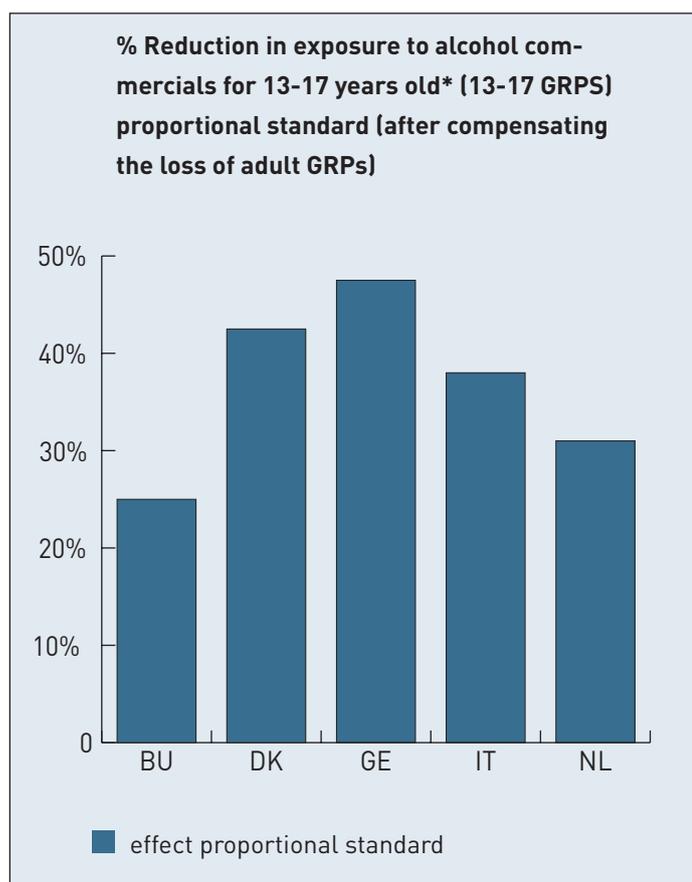


Figure 24: The percentage of reduction in exposure to alcohol advertising (13-17 GRPs) when introducing a proportional standard (6% in Bulgaria and Germany, 8% in Denmark and the Netherlands, and 5% in Italy). In all outcomes an entire compensation for the total number of adult GRPs lost due to the policy has been taken into account (GRPs = Gross Rating Points; a standard to measure per capita exposure to advertising). * Age group in the Netherlands is 12-17 years of age. Source: Nielsen, 2010.

3.6.2 Possible effects of a time ban

Data collected shows the large volume of alcohol commercials to which young people are exposed in the five European countries studied. Overexposure figures presented show that especially young people at the risk age [age 13-17] seem to be especially a target group for alcohol advertisers (compared to adults 18+). Two-third of the alcohol commercials to which under aged adolescents are exposed are alcohol commercials in which young people are overexposed. Product categories and brands that target adolescents differ per country.

Existing audience thresholds are not able to protect large number of young people from being exposed to alcohol commercials on television. Possible effects of more restrictive proportional standards have been presented which show a higher level of protecting youth from exposure (in terms of GRPs) than different time bans.

However, when evaluating these policy interventions, also more practical issues have to be taken into account. At this moment, all kinds of thresholds/proportional standards that are in place are implemented in self-regulation. Self-regulation has been proven insufficient in numerous countries mostly because there is a general conflict of interest when economic operators have to restrict their own marketing practices (De Bruijn et al 2010).

Implementing a proportional standard in self-regulation is especially problematic since: (1) Monitoring should be done by bodies independent from economic operators; (2) When volume data over a longer period of time is accessible, it is very expensive; (3) Monitoring can only be done after possible youth exposure ("when harm is already done"); (4) A system with effective sanctions is generally lacking; and (5) A legal back stop is missing.

A watershed to restrict the placement of alcohol commercials within certain time periods seems to be easier to implement and to enforce into legislation compared to a proportional standard.

In practice, however, we see that the alcohol advertising sector change their advertising strategy when confronted with this volume restriction. It is highly likely that shifts in alcohol advertising will occur after the introduction of a watershed. In this way, at late hours youngsters can be overexposed at times that broadcasting alcohol commercials is allowed. Since alcohol advertisers change their advertising behavior in order to reach as many people as possible, time slots are suggested to have only limited effects in restricting youth exposure. For this reason, an overall restriction of alcohol commercials and promotion is desired to protect young people against exposure to televised alcohol advertising.

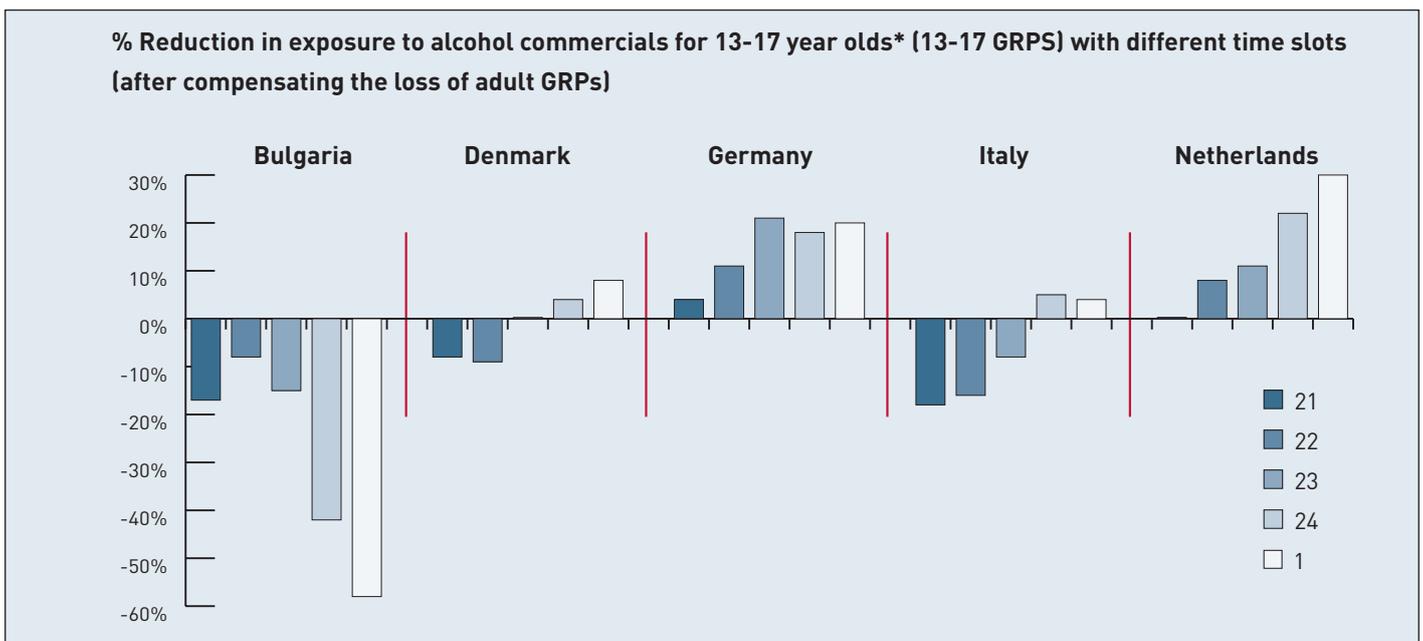


Figure 25: The percentage of reduction in exposure to alcohol advertising (13-17 GRPs) at different time slots. In all outcomes an entire compensation for the total number of adult GRPs lost due to the policy has been taken into account (GRPs = Gross Rating Points; a standard to measure per capita exposure to advertising). * Age group in the Netherlands is 12-17 years of age. Source: Nielsen, 2010.

3.7 Conclusion

Data collected shows the large volume of alcohol commercials to which young people are exposed in the five European countries studied. Figures on over exposure presented show that especially young people at-risk (age 13-17) are especially targeted by alcohol advertisers (compared to adults 18+). Two-third of the alcohol commercials to which under-aged adolescents are exposed are alcohol commercials in which young people are overexposed. Product categories and brands that target adolescents differ per country.

Existing audience thresholds do not protect large number of young people from overexposure to alcohol commercials on television. This report has presented the possible effects of more restrictive proportional standards which show a higher level of protecting youth from exposure (in terms of GRPs) than different time bans. The Chair of the European Alcohol and Health Forum concludes that an agreement among economic operators to move towards a common threshold principle could be a next step forward (European Commission - DG SANCO, 2009).

However, practical issues have to be taken into account when evaluating the policy interventions such as a proportional standard or a time ban. At the moment, there are a variety of thresholds/ proportional standards in place that have been implemented and regulated. Regulation has proven insufficient in numerous countries because there is a genuine conflict of interest when owners are tasked with restricting their own marketing practices (De Bruijn et al 2010). Implementing a proportional regulatory standard is especially problematic since: (1) Monitoring should be done by bodies independent of owners; (2) data covering a long period of time is very expensive, when even accessible; (3) Monitoring can only be done after possible youth exposure (“when harm is already done”); (4) A system with effective sanctions is generally lacking; and (5) A legal back stop is missing.

A watershed to restrict the placement of alcohol commercials within certain time periods seems to be easier to implement and to enforce into legislation compared to a proportional standard. In practice, however, we see that the alcohol advertising sector change their advertising strategy when confronted with this volume restriction. It is highly likely that shifts in alcohol advertising will occur after the introduction of a watershed.

Alcohol advertising is clearly very important to the alcohol industry. Exposure to televised alcohol advertising increases alcohol consumption among young people (Anderson et al., 2009, Smith & Foxcroft, 2009). In order to restrict youth exposure to televised alcohol marketing, clear alcohol marketing regulations are necessary. Since self-regulation is insufficient to protect young people, legislation is necessary (De Bruijn, et al., 2010). However, since alcohol advertisers change their advertising behavior in order to reach as many people as possible, time slots are suggested to have only a limited impact on restricting youth exposure. For this reason, an overall restriction of alcohol commercials and general product promotion is necessary to protect youth against exposure to televised alcohol advertising. This is in line with the advice of public health experts who increasingly advocate a comprehensive ban on alcohol marketing (Anderson 2009, Ormsby, 2009).

Chapter 4

ALCOHOL BRANDED SPORT SPONSORSHIP OF TOP CLUBS

4.1 Introduction

Recent studies provide evidence that sporting events sponsored by the alcohol industry is associated with higher levels of consumption among sport spectators (O'Brien 2011) compared to spectators at sporting events where the event is not sponsored by the alcohol industry (O'Brien, Miller, Kolt, Martens, & Webber, 2011) (O'Brien en Kypri 2008).

There is no data publicly available that gives insight in the number of sport clubs that are sponsored by alcohol brands. The AMMIE project has made the first attempt to examine alcohol-branded sport sponsorship of the top clubs of the five most frequently performed sports teams in Bulgaria, Denmark, Germany, Italy and the Netherlands. The goal was to examine whether these clubs are sponsored by alcohol producers and if so, how visible the alcohol brands are on their websites.

4.2 Methods

National statistics were used to select the five most frequently performed sports teams in each country. Of these sports, the ten teams that play in the highest division are rated as top clubs.

Of these 50 top clubs, the club websites have been scanned thoroughly for the presence of alcohol-branded sponsors. The results of this study have been described in more detail in the country reports: "Alcohol related sports sponsorship: report on sport sponsorship by alcohol producers": www.eucam.info/eucam/home/ammie-sports-sponsoring.html.

4.3 Results

Table 6 shows an overview of the presence of alcohol-branded sponsoring of top sport clubs in the countries studied. As the table indicates, there are large differences between countries. For this reason, findings are presented by each country.

Table 6 – Percentage of top clubs that are sponsored by alcohol brands by country and sport.

	Bulgaria		Denmark		Germany		Italy		Netherlands	
Most popular sports	sport	% alcohol sponsoring	sport	% alcohol sponsoring	sport	% alcohol sponsoring	sport	% alcohol sponsoring	sport	% alcohol sponsoring
1	Football	10%	Football	70%	Football	100%	Football	50%	Football	100%
2	Basketball	0%	Handball	10%	Handball	100%	Basketball	50%	Basketball	10%
3	Volleyball	0%	Basketball	10%	Basketball	70%	Volleyball	70%	Field Hockey	70%
4	Field Hockey	0%	Volleyball	10%	Volleyball	60%	Rugby	40%	Volleyball	10%
5	Handball	0%	Cycling	0%	Field Hockey	30%	Water Polo	20%	Korfball	50%
Total		2% (1/50)		20% (10/50)		72% (36/50)		46% (23/50)		44% (24/50)

Bulgaria

An analysis of the Bulgarian sport club website surprisingly shows that only 1 out of 50 professional sport clubs studied is sponsored by an alcohol brand (which is the football club Blagoevgrad, sponsored by Pirinsko beer, a Carlsberg brand). However, some national football and basketball organizations and tournaments are sponsored by alcohol brands (in football: the tournament “Amateurs meet professionals”, is sponsored by the beer brand Ariana, which is owned by Heineken and the amateur tournament Kamentiza Fan Cup, which is sponsored by the beer producers Kamenitza. In basketball the Bulgarian Basketball Federation is sponsored by beer producer Ledenika MM). Sports like volleyball, hockey and handball are completely neglected by the Bulgarian alcohol industry.

Why the Bulgarian alcohol industry has yet to enter more aggressively into sports sponsoring is a question that has yet to be answered. One possible explanation may be the lack of athletic achievements of Bulgarian athletes. Another explanation may be the clear and steady trend of people withdrawing their interest from local sports.

It is not expected that the alcohol sponsorship of Bulgarian sports will develop further.

Sponsorship will most likely continue to concentrate on football because it is the most popular and a highly televised sport. Only a few professional sport clubs will be sponsored by alcohol brands. Instead the alcohol industry’s focus will be on supporting tournaments, organizations or national teams because this results in more exposure to the general public.

Denmark

Danish sport sponsorship by the alcohol industry was mainly found on the websites of football clubs. Seven of the top ten clubs are sponsored by five alcohol brands. Carlsberg is the top sponsor (sponsoring FC Copenhagen, AGF and Silkeborg FC) and Royal Unibrew second (sponsoring Esbjerg FC, FC Nordsjaelland and Køge FC). Alcohol industry sponsorship is not very widespread in other popular sports. Of the top ten handball clubs, only one was sponsored by an alcohol producer, namely Carlsberg. Of the top ten basketball clubs only one was sponsored by an alcohol producer, namely Hagelquist wine. Of the top ten volleyball clubs only one was sponsored by alcohol producers, namely Holte Vinlager wine. That said, it should be noted that the alcohol industry sponsors sport events in clubs even when it is not the lead sponsor.

Additionally, the results indicated that the alcohol industry does sponsor some amateur clubs.

Germany

The analysis of websites confirms that the alcohol industry sponsors widespread athletic events and clubs in Germany. 36 of the 50 sport clubs monitored are funded by alcohol producers.

The football and handball clubs studied are sponsored by at least one alcohol producer. Three breweries are the main sponsors (jersey partners) for the German handball league teams.

The alcohol industry's interest in German football and handball is due to the fact that both sports are highly represented in the German media. This media coverage and the alcohol industry's subsequent sponsoring of sporting activities increases the degree of brand awareness of the spectators.

Much like football and handball, basketball is another popular sport from which the alcohol industry likes to market its products. Of the ten teams monitored, seven are supported by alcohol producers. Volleyball and hockey receive the least amount of attention in terms of sponsorship due to these sports rarely being covered by the German media. Of the ten volleyball clubs monitored, only six were sponsored by alcohol producers; and although the alcoholic beverage KaMu appears to be highly consumed among hockey athletes, just three in ten hockey teams are sponsored by the industry.

Volleyball and hockey teams are less attractive sports for sponsorship because they are funded by local companies, marketing and selling their products only within the region of the respective clubs. Whereas, football, handball and basketball clubs are sponsored by large and well-known alcohol producers because of the attention received by a much wider audience.

Interestingly, all sport clubs sponsored by the alcohol industry are sponsored by breweries. Some are funded by champagne, wine, sparkling wine or spirit producers, but these products are never the sole sponsor of an event or club. The results underline the important association between sport in Germany (particularly football) and beer.

Italy

Of the fifty sport club websites that were visited for this report, 23 (46%) were sponsored by an alcohol producer and/or by an alcohol distribution business (restaurants, wine cellars, alcoholic beverages retailers, etc). The sport clubs are sponsored both by big multinational brands as well as regional and even local producers. Some clubs have more than one alcohol sponsor. Two national federations (football and rugby) are also sponsored by alcohol brands.

Sport sponsorship seems to be a common form of promotional practise in Italy. Given the great popularity of the five sports and their high level clubs, promotion through sponsorship ensures high visibility of products and brand recognition.

Although the sport events with the famous clubs are not exclusively viewed by youth, nonetheless children and adolescents represent a significant proportion of the general viewing public. In this regard, the message to youth is clear: sport and alcohol consumption is positive and fun and famous players support the very brands advertised. Alcohol consumption is therefore connected to the healthy image of sporting activities, although it is, in reality, a causal factor in more than 60 different diseases and illnesses.

The association of alcohol with sport activities sends the message to youth that it is normal to link alcohol consumption to any sport activity and event.

Given the massive exposure of young people to alcohol promotion through sport sponsorship, a clear set of guidelines outlining the regulation of sport sponsorship is both needed and appropriate. A best-case example would be to restrict sponsorship of sporting events and clubs the way France and Norway do. The French example (Loi Evin, 1991) shows that such a ban does not threaten the continued existence of sports, sports clubs and sports events. With its alcohol sponsorship and advertisement ban in place, France still succeeded in hosting the 1998 FIFA World Cup and is currently hosting the International Rugby Competition.

The Netherlands

Of the 50 sports club websites that were visited for this report 29 (58%) stated that the clubs are sponsored by alcohol producers. The way the sponsorship deals are executed varies greatly between the selected sport branches and, in some cases, even between clubs of the same sport.

It is indeed remarkable that a large brewery like Heineken is able to use different sports to promote their different brands. For example, the Heineken brand—a premium brand—is strongly connected to elite sports such as field hockey (by sponsoring half of the top ten Premier League clubs) and sailing (the Heineken Regatta). Heinekens Amstel brand, however, is tied just as strongly to folk sports like soccer (by sponsoring half of the top ten Premier League clubs).

Another interesting finding is the differences in the naming of the sponsorship deals. Whether the alcohol producers are called 'partner', 'star sponsor', 'silver sponsor', 'business sponsor', or 'head sponsor', in virtually all cases they are considered partners, which implies mutual benefits. However, often it is unclear to outsiders what role the alcohol producers actually play within the club.

Lastly, it is interesting to observe the many different ways sports sponsorship is used to promote alcohol brands, especially on the football clubs' websites. Yet, this study has only focused on the websites of the clubs, while in practice, the ways in which marketing can be carried out is nearly limitless (billboards next to the field or in stadiums, promotional items, naming of stadiums etc.)

Moreover, it is very likely that not every form of alcohol marketing through sport sponsorship is reported or advertised on the club website. It is likely that more marketing is taking place inside club canteens or on the sidelines of sports fields. But, this lies beyond the scope of this research and thus remains speculation.

4.4 Conclusion

While evidence is mounting that sports sponsorship by alcohol producers affects the drinking behavior of a sports spectators, (O'Brien, Miller, et al. 2011) regulations concerning sports sponsorship are rare and largely ineffective (Hastings, O., et al. 2010) (Hastings and Sheron 2011). This is problematic because alcohol is being associated with a healthy image of sports and sport clubs that reaches a large proportion of minors. This chapter provided an overview of alcohol industry sports sponsorship on the websites of the top ten premier league sports clubs of the five most popular team sports in Bulgaria, Denmark, Germany, Italy and the Netherlands. Since results of the analysis highly differ between the selected sports and country, findings are presented by country.

The findings provide insight into the way sponsorships shape their contributions to popular sports and their clubs in the five countries studied. Not only does the presence of an alcohol brand sponsoring a sport club stand out, but also the role of this sponsor in shaping the image of the club. When alcohol producers sponsor a sport club, not only can their logo be found on their website, the stadium or sporting hall can be named after the alcohol brand and the alcoholic beverages of this brand can be sold on the website and/or within the sporting club (canteen/bar). In this way the alcohol brand attempts to associate itself with the sport, the sport club, its sportive success, the loyalty of its fans and its positive image in society.

Chapter 5

TESTING SELF-REGULATION OF ALCOHOL ADVERTISING IN EUROPE

5.1 Introduction

Much of the regulation of alcohol advertising has been created and is enforced by the alcohol industry itself and is therefore called self-regulation. In practice, most evaluations of these regulations are done exclusively by commercial parties and are therefore not independent. The AMMIE project made a first attempt to evaluate the functioning of content and volume restrictions in existing self-regulation codes in Bulgaria, Denmark, Germany, Italy and the Netherlands.

5.2 To appeal or not to appeal: Testing content restrictions in self-regulation codes

5.2.1 Method

In 2010, the five NGOs participating in the AMMIE project selected 84 alcohol marketing practices that appeared to be in violation of existing national rules for self-regulation. The next step was to file complaints against these practices with the national Alcohol Advertising Committees, who are to decide whether these complaints are to be upheld or not.

The project then proceeded to ask the five Youth Rating Panels from the five participating countries to give their opinions on a selection of the complaints. One of the questions was: Do you think these advertisements are attractive to your peers? The answers to these and other questions about these advertisements were compared to the decisions of the Advertising Code Committees.

A European complaint report presents an overview of the results of these procedures and an overview of the project results of the five participating countries: "To appeal or not to appeal: testing self-regulation of alcohol advertising in Europe". An even more detailed description can be found in the five separate national reports published by the five NGOs that participated in the AMMIE project: "Complaints on alcohol marketing: report on complaints and the complaint system of alcohol marketing": www.eucam.info/eucam/home/ammie-complaints.html.

5.2.2 Results

1 – Many complaints about advertisements were rejected

In 2010, in the five participating countries there were a substantial number of advertisements that gave cause for complaint and were filed for a number of reasons (a total of 199 complaints against 84 advertisements). The most complaints (72%) were not upheld (e.g. Example 1.), but a substantial portion of the complaints (23%) were indeed upheld by the Advertising Code Committees of self-regulation and in some cases the statutory advertising system. It is remarkable that, in this respect, no significant difference between the participating countries has been found.



figure 26

Example 1 German Advertisement for König Pilsener (TV commercial)

Young Opinion Panel: Most minor respondents (25 of 30) knew Boris Becker as a former tennis player.

Code Committee: As Boris Becker has resigned from competitive sports a long time ago, the commercial does not display an athlete drinking, and thus does not violate the Code. Children and youth have certainly not witnessed his active sports career.

Complaint rejected

2 – Advertising Code Committees accept relatively large amounts of alcohol advertising practices which are appealing to young people

In many occasions, young people (aged 12-18 years) from the five participating countries had an opinion that was in sharp contrast with the opinion of the Advertising Code Committee for self-regulation. Most often, this concerned the theme of advertising appealing to young people (e.g. example 2 and 3). When watching the commercials young people often noted that: “This advertisement is attractive to our peers.”

The (almost) standard answer of the Advertising Code Committee was: “This advertising campaign is probably attractive to young people but it is not shown to be specifically aimed at them, adults find the advertisement attractive as well”. Subsequently, the complaint was not upheld because of this line of argument. The conclusion is that many alcohol advertisements that attract young people were not in violation with the existing national self-regulation of alcohol advertising.

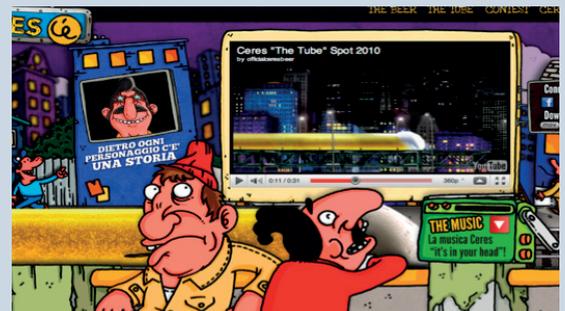


figure 27

Example 2 Italian Ceres Beer (tv-commercial)

Youth Opinion Panel: Most respondents (21 of 22) think this commercial is attractive to their peers.

Opinion Code Commission: the complaint is rejected because the use of cartoons does not necessarily mean that the ad is targeting children or adolescents.

Complaint rejected



figure 28

Example 3

Denmark: Carlsberg Goal Party (TV/Cinema commercial; context World Championship)

Youth Opinion Panel: Almost all (38 out of 40) respondents found that their peers would like the advertisement. Most of the respondents (27 of 40) thought that this advertisement contains elements which are associated with youth culture, and 28 of 40 thought that in this advertisement, drinking results in sportive success.

Code Committee: The committee acknowledges the breach of the code's article about alcohol and improved physical capacity, but disagrees with the complaint that this advertisement is linking alcohol and sports as well as targeting minors.

Complaint: partly upheld

3 – Many alcohol advertisements contain features from youth culture

In the alcohol advertisements assessed in all countries, features were found (animations, music, colors, etc.) that, according to the partners, are style elements of youth culture (eg Example 2 and 4). These elements make advertising appealing to young people. Thus, many alcohol advertisements were found to be in breach with the recommendations of the Council Recommendations (2001). Further, televised advertising was found to violate the provisions of Article 15 of the Audio Visual Media Services Directive (AVMSD).



figure 29

Example 4

The Netherlands: Heineken (a colourful World Cup gadget also promoted in a TV-commercial)

Youth Opinion Panel: according to a large majority of the questioned youth, the Pletterpet is attractive to their peers (27 out of 37), and more than half (21 out of 37) thought their peers would like to have this gadget.

Decision of the Advertising Code Committee: "Despite the fact that there are stickers in the package, one cannot say it is a product specifically targeting minors. The stickers are not specifically targeted at young people and only serve to decorate the object. Furthermore, the advertiser provided sufficient evidence that the word 'to pimp' and the sentence 'pimp your Pletterpet' is not youth language as defined in the Code guidelines. Nor does the Committee believe that the Pletterpet is designed in a way that is specifically targeting young people."

Complaint rejected

4 – Humour is an attractive style element to young people, but humor is not addressed in self-regulatory codes

Humour plays an important role in many advertising campaigns. Confirmed by scientific studies (Chen et al 2005) and according to the partners of the project, humour makes alcohol advertising more attractive to young people. Rules concerning the type of humour are, however, not included in the advertising codes of self-regulation.

For this reason, complaints based on the occurrence of the type of humour cannot be accepted by the Advertising Code Committee and are therefore systematically rejected. When irony is used in alcohol commercials, the use of 'restricted' elements becomes allowed (e.g. Example 5).



figure 30

Example 5

Italy: Caffè' Borghetti (website)

Youth Opinion Panel: A large majority of the respondents (20 of 22) think that the advertising is attractive to their peers and it could give the impression that drinking makes social relationships easier, while also contributing to social and sexual success.

Opinion Code Commission: No violation has been identified, since the message delivered in this communication is acceptable and mainly ironic. The melting ice cubes represents only a seductive game between adults, beyond the promoted product.

Complaint rejected

5 – Many advertisements are, judging by the views of the Youth Panels, in breach with the Council Recommendation and AVMSD

Many alcohol advertisements that were broadcasted in the five participating countries in 2010 are, based on the opinion of the Youth Panels, attractive to youth. Consequently, this conclusion means that these advertisements are in conflict with the advice of the Council Recommendation (European Commission, 2001) and in breach with the Audiovisual Media Services Directive (European Commission, 2010).

6 – The formulation of the self-regulation articles are clever and precise; complaints are therefore easily rejected

The existing national and European regulations on the content of alcohol advertising do not adequately protect young people. The exact reason is that these regulations are clever and precisely formulated thus resulting in easily rejected complaints.

Two examples:

- The existing rule that alcohol advertising may not specifically be aimed at youth leaves the freedom for advertising appealing to youth as well as adults.
- The existing rule that alcohol advertising should not suggest that alcohol use leads to social, sexual or sportive success leaves ample space for advertising where alcohol is clearly associated with these types of success as long as no causal relationship is shown. Complaints about such advertisements will only be upheld if it is visible that the use of alcohol literally precedes success (e.g. Example 6 and 7).

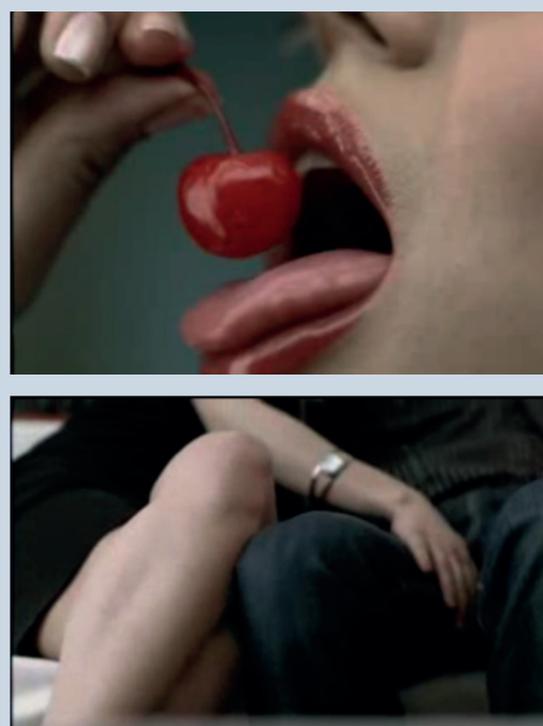


figure 31

Example 6

Bulgaria: Vodka Flirt – Cherry (TV commercial)

Youth Opinion Panel (18 out of 25 respondents): ad implies social and sexual success

Opinion Code Committee: ad does not imply social and sexual success as a result of alcohol use.

Complaint rejected



figure 32

Example 7
from Italy: Vodka Arctic (TV commercial)

Youth Opinion Panel: All respondents (22 of 22) think this commercial is attractive to peers and gives the impression alcohol facilitates social success.

Opinion Code Commission: the ad does not refer to the relation between alcohol and facilitation of social relationships.

Complaint rejected

5.3 Testing a proportional standard

Chapter 3 of this report on the volume of alcohol commercials on television describes the exposure of 13-17 year-olds to alcohol commercials on television in the five countries studied. In the analyses conducted, the proportional standard implemented in national and European self-regulatory codes was evaluated and its adherence was tested. Results described in chapter 3 showed the violations made to this regulation (see table 4 on page 21). There was a range of differences in levels of adherence found between May and October 2010; ranging from zero violations found in Germany to 427 violations found in Denmark.

In order to examine the compliance to the 30% threshold (in the Netherlands 25% threshold), the percentage of viewers who were minors was calculated and compared to the total number of viewers of a particular program (and any alcohol commercials that were broadcast during the television program). Table 4 shows that violations have been found in every country, except for Germany, to this self-regulatory code during May and October 2010.

Thus, in practice the 30% or 25% threshold does not appear to protect large numbers of minors from alcohol advertising. The country reports illustrate examples from each country that show the ineffectiveness of the existing proportional standard. The examples provided demonstrate how low percentages, not violating the threshold, can be much more harmful than (very) high percentages that are violating the proportional standard. This has to do with the absolute number of minors -compared to adults- that are watching. As long as there are more adults watching relative to minors, the 25% or 30% threshold will not be reached. This way, the 25% or 30% rule allows large absolute numbers of minors to be reached by alcohol commercials without the self-regulation code being violated.

5.4 Conclusion

The restrictions in place via the self-regulation codes in the five European countries studied do not protect young people against appealing alcohol advertising and product promotion. The differences in opinion between the youth panels and the Advertising Code Committee illustrates the inability of the ACC to identify and prohibit alcohol marketing practices that appeal to minors.

The claim that alcohol advertising is not specifically aimed at young people provides a loophole for advertisers to create marketing initiatives that appeal to both young people as well as adults. Elements included in alcohol advertising campaigns that are, according to our youth panels, part of the youth culture, were not identified as such by Advertising Code Committees. Moreover, humour is an attractive style element to young people and yet is not addressed in the self-regulatory codes.

Not only is the content, but also the volume restriction in self-regulatory code, problematic. The data presented in chapter 3 illustrates that the 25% or 30% thresholds allows large absolute numbers of minors to be reached by alcohol commercials without the self-regulation code being violated. Moreover, enforcement of this regulation is problematic due to several reasons: (1) Monitoring of the proportional standard should be done by bodies independent from owners and producers of alco-

holic brands; (2) When volume data over a longer period of time is accessible, it is very expensive; (3) Monitoring can only be done after possible youth exposure (“when harm is already done”); (4) A system with effective sanctions is generally lacking; and (5) Legal recourse is missing.

The difficulties concerning content and volume adherence again lead to the conclusion that self-regulation for alcohol advertising does not work.

Chapter 6

CONCLUSION

The effects of alcohol advertising and marketing on the drinking behaviour of youth have been more and more extensively studied over the past few years. The evidence base has grown substantially and demonstrates that exposure to large volumes of alcohol advertising has an undesirable impact on the drinking behaviour of youth. Exposure to alcohol advertising and product promotion that young people find appealing is suggested to strengthen this effect.

In Europe numerous alcohol marketing regulations are in place that are said to protect young people from large volumes of alcohol marketing and/or from attractive alcohol marketing practices. These regulations are either voluntary rules of the industry (self-regulation) or are implemented by law (statutory regulation).

The AMMIE project aimed to monitor alcohol marketing practices in Europe by bodies independent from the commercial interests of the sale of alcohol, and to evaluate the effectiveness of existing alcohol marketing regulations in five European countries (Bulgaria, Denmark, Germany, Italy and the Netherlands). A summary of the results have been provided in this report. More details can be found in the country reports which are publicly available on the website of EUCAM: www.eucam.info/eucam/home/ammie.html.

Examples of trends in alcohol marketing described in chapter 2, show the innovative ways in which alcohol producers are able to extend their market share while circumventing existing regulations. Such strategic thinking on behalf of the alcohol industry challenges policy makers to create alcohol marketing regulations that cover all alcohol marketing practices perceived as undesirable.

Chapter 3 and 4 elaborate on the impact the volume (and exposure) of specific types of alcohol marketing have on youth and adolescent consumption. In chapter 3, attention is paid to the volume of alcohol commercials on television with particular emphasis the impact exposure to such alcohol commercials has on adolescents. Results show that among the large volume of alcohol commercials youth are exposed to in the five European countries studies, especially young people between the age of 13-17 are vulnerable to but expressly targeted by alcohol advertisers (compared to adults 18+). Two-third of the alcohol commercials that under aged adolescents are exposed, are indeed alcohol commercials that youth are overexposed to. Product categories and brands that target adolescents differ per country. Existing audience thresholds are not able to protect large numbers of youth from being exposed to alcohol commercials on television.

Also, time bans are (and/or will have) limited protective power when considering the innovative way in which alcohol producers are able to make up for the lost GRPs.

In chapter 4 more insight in alcohol-branded sport sponsorship is given by providing an overview of alcohol sponsorship of the top sport clubs in the five countries studied. Findings illustrate the importance of alcohol-branded sponsorship within the most popular sport (clubs). Not only does the presence of an alcohol brand sponsoring a sport club stand out, but also the role of the sponsor in shaping the image of the club. When alcohol producers sponsor a sport club their logo is not only found on the sport club's website, but also the stadium or sporting hall can be named after the alcohol brand and the alcoholic beverages of this brand can be sold on the website and/or within the sporting club (canteen/bar). In this way the alcohol brand attempts to be associated with the sport, the sport club, its sportive success, the loyalty of its fans and all with the intention of reasserting its positive image in society.

Chapter 5 evaluated and tested existing self-regulatory codes in the countries studied that restrict the content and/or volume of alcohol advertising (and promotion). The differences in opinion between the youth opinion panels and the decisions of the Advertising Code Committees illustrate the incompetence of self-regulation codes and the Advertising Code Committee's ability to identify and prohibit alcohol marketing practices that are appealing to minors. Not only is the content restriction, but also the volume restriction in self-regulatory code problematic. Many European alcohol producers and/or advertisers have included a measure in their self-regulation codes that should prevent large numbers of minors from exposure to alcohol advertising. According to this restriction, alcohol advertisers are not able to reach an audience when more than 30% (or 25%) of the audience consists of minors. This 25% or 30% threshold allows large absolute numbers of minors to be reached by alcohol commercials without the self-regulation code being violated. Moreover, enforcement of this regulation is problematic due to several reasons which were described in chapter 5.

The findings of systematic monitoring underline the importance of alcohol advertising and product promotion for the alcohol industry. Alcohol producers use innovative ways to reach new potential consumers while circumventing existing alcohol marketing restrictions at the same time. Data collected within the AMMIE project shows that existing self-regulation codes are not able to protect young people from exposure to large volumes of alcohol marketing practices and appealing alcohol advertising. Self-regulation has been proved insufficient in Western countries: Australia (Jones & Donovan 2002, Jones et al 2008), the Netherlands (Van Dalen & Kuunders 2003); the United Kingdom (KPMG 2008, Hastings et al 2010); the United States (Gomes & Simon, 2008); and Brazil (Vendrame & Pinsky 2010). All the findings presented in this report once again support the conclusion that self-regulation for alcohol advertising and promotion does not work.

Chapter 7

RECOMMENDATIONS

The data collected in the AMMIE project of which a summary is presented in this report result in the following recommendations:

- 1 → Alcohol marketing restrictions are recommended to cover all types of alcohol marketing rather than defining alcohol marketing as narrow as alcohol advertising.**

Trends in alcohol marketing show that alcohol producers are very creative in marketing alcohol to potential new consumers (e.g. young people). To avoid circumvention of existing regulations, alcohol marketing restrictions should be as comprehensive as possible whereas they cover alcohol marketing practices by different possible marketing channels.

- 2 → Alcohol marketing regulations are recommended to focus on restricting the volume of alcohol marketing rather than the content.**

Content restrictions that are in place in self-regulation codes are ambiguous and open to interpretation. In order to avoid exposure to harmful alcohol marketing practices, volume restrictions are essential.

- 3 → When the content of alcohol marketing is regulated, content restrictions are recommended to address all aspects that are allowed to be used in alcohol marketing instead of what is not permitted.**

An example is the French Loi Evin which only allows alcohol advertisements with product information and therefore restricts humorous alcohol advertising or advertisements that are not specifically aimed at young people but are still attractive to them.

- 4 → Volume restrictions are recommended to be implemented in legislation rather than self-regulation codes.**

Volume data on alcohol commercials on television show that the proportional standard implemented in most self-regulation codes are ineffective in protecting minors towards alcohol marketing. Limitations of this volume restriction in self-regulation codes are suggested to be even more visible with marketing channels other than television.

5 → Volume restrictions in alcohol marketing are recommended to be as restrictive and comprehensive as possible.

The current report has described the large amount of alcohol marketing to which young people are exposed to in everyday life. Partial volume restrictions are thought to be insufficient to protect youth exposure due to expected changes in the advertising behavior of the alcohol industry after introducing these partial bans. There is a need to restrict the industry's ability to reach young people through televised alcohol advertising and product promotion. Obviously the most protective measure would be to implement a comprehensive EU wide, ban on alcohol advertising. Such a ban would ensure the effective regulation and restriction concerning the shifting of advertising, cross-border advertising and the occurrence of sponsorship of and product placement in television programs.

6 → Governments are recommended to pressure alcohol producers to release relevant alcohol marketing figures.

Publicly available data on the prevalence of alcohol marketing in society is scarce. In the United States, the largest alcohol producers report the marketing expenditures to the Federal Trade Commission (2008). In most other countries, this practice is non-existing. Consequently, there is little data available on the total size of alcohol marketing and even less on youth exposure to alcohol advertising. When available, cost of this data is very high and not accessible to public health agencies or other independent bodies that wish to monitor alcohol marketing systematically. Additionally, there seems to be an increasing shift towards more non-traditional and so called "below the line" advertising. Advertising expenditures and youth exposure figures of these below the line marketing are almost non-existing or are only available to alcohol producers. Alcohol producers should be pressured to prove their adherence to existing regulations by supporting the release of objective data on (youth) exposure to alcohol marketing.

7 → When alcohol marketing is allowed, it is recommended that alcohol marketing tools that are difficult to monitor or reach many young people be prohibited.

Banning alcohol marketing is especially important for marketing channels that are difficult to monitor by independent monitoring bodies. An example that is increasingly important to restrict but difficult to monitor is alcohol advertising on the internet.

8 → Alcohol marketing is recommended to be monitored systematically by independent monitoring bodies.

The research discussed above emphasizes the importance of monitoring alcohol marketing activities of the alcohol industry. Otherwise, one would not be able to obtain more detailed insight into the volume of alcohol marketed and the degree of impact this exposure to marketing has on young people without any compliance to existing regulations. In the Council Conclusions on Alcohol and Health of the Council of the European Union (2009) it is stated: "The Council of the European Union invites the Member States to: (...) Ensure that, where in place, self-regulatory standards and codes are developed, implemented and monitored in collaboration with health-promoting entities" (Council of the European Union, p.5, 2009).

Also the WHO European Alcohol Action Plan for 2012-2020 (June 15, 2011, p.16) states that: "Monitoring of alcohol marketing practices is best done when it is the responsibility of an independent body or a government agency, and when it is performed systematically and routinely" (p.16). It is therefore recommended that Member States are given the opportunity to continue or start with the monitoring of alcohol advertising and marketing reaching the youth in their countries.

Chapter 7

REFERENCES

- *AdFundum, vakblad voor de drankenbranche*, 18 (12), 2010.
- *AdFundum, vakblad voor de drankenbranche*, 19 (5), 2011.
- *AdFundum, vakblad voor de drankenbranche*, 19 (6/7), 2011.
- Anderson, P. (2009). Global alcohol policy and the alcohol industry. *Current Opinion in Psychiatry*, 22(3), 253-257.
- Anderson P, de Bruijn A, Angus K, Gordon R, Hastings G (2008). Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol and Alcoholism*, 44 (3), 229-243.
- Austin, E.W., & Knaus, C. (2000). Predicting the potential for risky behavior among those “too young” to drink as the result of appealing advertising. *Journal of Health Communication*, 5(1),13-27.
- Austin, E.W., Chen. M.J., & Grube, J.W. (2006). How does alcohol advertising influence underage drinking? The role of desirability, identification and skepticism. *Journal of Adolescent Health*, 38(4), 376-384.
- Berkey, C.S. et al. (2010). Prospective Study of Adolescent Alcohol Consumption and Risk of Benign Breast Disease in Young Women. *Pediatrics*, 125(5), e1081-e1087. Doi: 10.1542/peds.2009-2347
- De Bruijn, A., Johansen, I., & Van den Broeck, A. (2010). *Effective Alcohol Marketing Regulations: A proposed framework to evaluate existing alcohol marketing regulations*. Utrecht: Dutch Institute for Alcohol Policy (STAP).
- CAMY (2005). *Striking a balance: protecting youth from overexposure to alcohol ads and allowing alcohol companies to reach the adult market*. Washington D.C.: CAMY.
- Casswell, S., & Zhang, J.F. (1998). Impact of liking for advertising and brand allegiance on drinking and alcohol-related aggression: a longitudinal study. *Addiction*, 93(8), 1209-1217.
- Chen, M.J., Grube, J.W., Bersamin, M., Waters, E., & Keefe, D.B. (2005). Alcohol Advertising: What makes it attractive to youth? *Journal of Health Communication*, 10(6), 553-565.

- Council of the European Union (2009). *Council Conclusions on Alcohol and Health. 2980th Employment, Social Policy, Health and Consumer Affairs Council meeting*. Brussels, 1 December, 2009. Retrieved from: http://www.consilium.europa.eu/uedocs/cms_Data/docs/pressdata/en/lssa/111638.pdf
- DeliXL.nl (n.d.). Retrieved August 5 from: <http://www.delixl.nl/inspiratie/trendsennovatie/speciaalbierepopulairondervrouwen/speciaalbierepopulairondervrouwen.jsp>
- EFRD (2009). *Common Standards for Commercial Communications*. Retrieved from: <http://www.efrd.org/communication/docs/EFRD%20CommStand-09-EN.pdf>
- Engels, R.C.M.E., Hermans, R., Van Baaren, R.B., Hollenstein, T., & Bot, S.M. (2009). Alcohol Portrayal on Television Affects Actual Drinking Behavior. *Alcohol & Alcoholism*, 44(3), 244-249.
- Eurobarometer (2010). *EU citizens' attitudes towards alcohol*. Brussels: TNS Opinion & Social.
- European Commission (2001). Council Recommendation of 5 June 2001 on the drinking of alcohol by young people, in particular children and adolescents (2001/458/EC). *Official Journal of the European Communities*. Retrieved from: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2001:161:0038:0041:EN:PDF>
- European Commission, Audiovisual Media Services Directive (2010). Directive 2010/13/EU of the European Parliament and of the council of 10 March 2010. *Official Journal of the European Union*, 2010, April 15. Retrieved from: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:095:0001:0024:EN:PDF>
- European Commission - DG SANCO (2008, July 16). European Alcohol and Health Forum: 3rd meeting of the task force on marketing communication. Brussels: European Commission. Retrieved from: http://ec.europa.eu/health/archive/ph_determinants/life_style/alcohol/forum/docs/ev_20080716_mi_en.pdf
- European Commission - DG SANCO (2009, November 12). European Alcohol and Health Forum: 5th Plenary Meeting Summary Report. Brussels: European Commission. Retrieved from: http://ec.europa.eu/health/alcohol/docs/ev_20091112_mi_en.pdf
- Gomes, L., & Simon, M. (2008). *Why Big Alcohol can't police itself*. Marin Institute. Retrieved from: http://www.marininstitute.org/site/images/stories/pdfs/08mi1219_discus_10.pdf
- Gordon, R., Wilks, L., & MacAskill, S. (2009). *Mapping Exercise Report on Targeting/ Not Targeting Youth*. ISM Institute for Social Marketing (Prepared for the European Commission DG SANCO). Retrieved from: http://ec.europa.eu/health/archive/ph_determinants/life_style/alcohol/forum/docs/youth_en.pdf
- Hastings, G., & Sheron, N. (2011). Alcohol marketing to children. *BMJ. Helping doctors make better decisions*. Retrieved March 24 from: <http://www.bmj.com/content/342/bmj.d1767.extract?sid=28ccb617-fb2b-46e1-a903-84346625305e>
- Hastings, G., Brooks O., Stead, M., Angus, K., Anker, T., & Farell, T. (2010). Failure of self regulation of UK alcohol advertising. *BMJ. Helping doctors make better decisions*. January 20, 2010. Retrieved from: <http://www.bmj.com/content/340/bmj.b5650.extract?sid=28ccb617-fb2b-46e1-a903-84346625305e>
- Jackson, M.C., Hastings, G., Wheeler, C., Eadie, D., & Mackintosh, A.M. (2000). Marketing alcohol to young people: implications for industry regulation and research policy. *Addiction*, 95(12s4), 597-608.
- Jernigan, D.H., & Mosher, J.F. (2005) Editors' introduction: alcohol marketing and youth--public health perspectives. *Journal of Public Health Policy*, 26(3), 287-91.
- Jernigan, D.H. (2006). *The Extent of Global Alcohol Marketing and Its Impact on Youth. Background Paper Prepared for the World Health Organization*. Geneva: World Health Organization.

- Jones, S.C., & Donovan, R.J. (2002). Self-regulation of alcohol advertising: is it working for Australia? *Journal of Public Affairs*, 2(3), 153-65.
- Jones, S., Hall, D., & Munro, G. (2008). How effective is the revised regulatory code for alcohol advertising in Australia? *Drug and alcohol review*, 27(1), 29-38.
- Koordeman, R., Anschutz, D.J., van Baaren, R.B., & Engels, R.C.M.E. (2011a). Effects of Alcohol Portrayals in Movies on Actual Alcohol Consumption: An Observational Experimental Study. *Addiction*, 106, 547-554. Doi: 10.1111/j.1360-0443.2010.03224.
- Koordeman, R., Anschutz, D.J., & Engels, R.C.M.E. (2011b). Exposure to alcohol commercials in movie theatres affects actual alcohol consumption in young adult high weekly drinkers: an experimental study. *The American Journal on Addictions*, 20, 285-291. Doi: 10.1111/j.1521-0391.2011.00134.x.
- Koordeman, R., Kuntsche, E., Anschutz, D.J., van Baaren, R.B., & Engels, R.C.M.E. (2011c). Do we act upon what we see? Direct effects of alcohol cues in movies on young adults' alcohol drinking. *Alcohol and Alcoholism*, 46(4), 393-398. Doi: 10.1093/alcal/ agr028.
- Meier, P., Brennan, A., Purshouse, R., Taylor, K., Rafia, R., Booth, A., et al. (2008). *Independent review of the effects of alcohol pricing and promotion: systematic reviews*. School of Health and Related Research, University of Sheffield, UK.
- Monteiro, M.G. (2007). *Alcohol and public health in the Americas: a case for action*. Washington: Pan American Health Organization.
- Nielsen Media Research (2010). (a.o. Creative Dynamix).
- NRC (2007, April 11). *Heineken: afzet vrouw moet hoger*. Retrieved from: <http://archieff.nrc.nl/index.php/2007/April/11/Economie/15/Heineken%3A+afzet++vrouw+moet+hoger/check=Y>
- Ormsby, A. (2009, September 8). *Doctors call for total alcohol advertising ban*. Retrieved from: <http://www.reuters.com/article/2009/09/08/us-britain-alcohol-idUSTRE58735A20090908>
- O'Brien, K.S., & Kypri, K. (2008). Alcohol industry sponsorship of sport and drinking levels in New Zealand sportspeople. *Addiction*, 103(12), 1961-1966.
- O'Brien, K.S., Miller, P.G., Kolt, G.S., Martens, M.P., & Webber, A. (2011). Alcohol Industry and Non-Alcohol Industry Sponsorship of Sportspeople and Drinking. *Alcohol and Alcoholism*, 46(2), 210-3.
- Pasch, K.E., Komro, K.A., Perry, C.L., Hearst, M.O., & Farbaksh, K. (2007). Outdoor Alcohol Advertising near Schools: What does it advertise and how is it related to intentions and use of alcohol among young adolescents? *Journal of Studies on Alcohol and Drugs*, 68, 587-596.
- Primack, B. A., Nuzzo, E., Rice, K.R., & Sargent, J.D. (2011). Alcohol brand appearances in US popular music. *Addiction*, 106(12). Retrieved from: http://dms.dartmouth.edu/news/2011/10/27_sargent.pdf
- Proctor, D.C., Babor, T.F., & Xuan, Z. (2005). Effects of cautionary messages and vulnerability factors on viewers' perceptions of alcohol advertisements. *Journal of Studies on Alcohol*, 66(5), 648-57.
- Science Group of the European Alcohol and Health Forum (2009). *Does marketing communication impact on the volume and patterns of consumption of alcoholic beverages, especially by young people? A review of longitudinal studies*. Scientific Opinion of the Science Group of the European Alcohol and Health Forum of the European Commission. Retrieved from: http://ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/docs/science_o01_en.pdf
- Smith, L.A., & Foxcroft, D.R. (2009). The effect of alcohol advertising, marketing and portrayal on drinking behaviour in young people: systematic review of prospective cohort studies. *BMC Public Health*, 9:51. Doi:10.1186/1471-2458-9-51.

- STAP (2007). *Alcohol Marketing in Europe. Strengthening Regulation to Protect Young People*. ELSA reports on the enforcement of national laws and self regulation of alcohol marketing. Utrecht: Dutch Institute for Alcohol Policy (STAP).
- STAP (2009). *Overview TV bans/restrictions (time and product) for alcoholic beverages in EU-27*. Retrieved from: http://www.alcoholreclame.nl/alcoholreclame/alcoholreclamebeleid_in_nederland/europa.html
- Urban (2011, March 23). Dansk Rock flirtet med erhvervslivet.
- Van Dalen, W. E., & Kuunders, M. (2003). *Don't ask a bird to clip his own wings*. Retrieved from: <http://www.alcoholpreventie.nl/bestand/bird.pdf>.
- Vendrame, A., Pinsky I, Souza, E.S., & Babor, T. (2010). Assessment of self-regulatory code violations in Brazilian television beer advertisements. *Journal of studies on alcohol and drugs*, 71 (3), 445-451.
- Van Dalen, W. E. (2011). *To appeal or not to appeal: Testing self-regulation of alcohol advertising. Results of the AMMIE-project (Alcohol Marketing Monitoring in Europe)*. Utrecht: Dutch Institute for Alcohol Policy (STAP). Retrieved from: <http://www.eucam.info/eucam/home/ammie-complaints.html>
- World Health Organization Regional Office for Europe (2011, June 15). *European action plan to reduce the harmful use of alcohol 2012-2020*. EUR/RC61/13. Retrieved from: http://www.euro.who.int/__data/assets/pdf_file/0006/147732/wd13E_Alcohol_111372.pdf
- World Cancer Research Fund / American Institute for Cancer Research (2007). *Food, Nutrition, Physical Activity, and the Prevention of Cancer: a Global Perspective*. Washington DC: AICR.

SUMMARIZING QUOTES FROM THE AMMIE REPORT

The AMMIE project is the first attempt to evaluate the functioning of content and volume restrictions in existing self-regulation (alcohol marketing) codes in Bulgaria, Denmark, Germany, Italy and the Netherlands (pag 30).

When more stringent alcohol (marketing) regulatory policy measures are introduced, the industry responds by developing innovative marketing tools to circumvent existing regulation (pag 15).

When alcohol marketing becomes more restricted, the industry responds by making use of marketing tools that are not (yet) covered by regulation (pag 15).

In the practice the 30% or 25% threshold (part of the self-regulation system) does not seem to be able to protect large numbers of minors from being protected against alcohol advertising (pag 21).

Figures on over exposure presented show that especially young people at-risk (age 13-17) are especially targeted by alcohol advertisers (compared to adults 18+) (pag 25).

The (almost) standard answer of the Advertising Code Committee was (regarding complaints about attractive ads): "This advertising campaign is probably attractive to young people but it is not shown to be specifically aimed at them, adults find the advertisement attractive as well". Subsequently, the complaint was not upheld because of this line of argument (pag 31).

Humour makes alcohol advertising more attractive to young people. Rules concerning the type of humour are, however, not included in the advertising codes of self-regulation (pag 33).

The existing national and European regulations on the content of alcohol advertising do not adequately protect young people. The exact reason is that these regulations are clever and precisely formulated thus resulting in easily rejected complaints (pag 33).

The restrictions in place via the self-regulation codes in the five European countries studied do not protect young people against appealing alcohol advertising and product promotion (pag 34).

The claim that alcohol advertising is not specifically aimed at young people provides a loophole for advertisers to create marketing initiatives that appeal to both young people as well as adults (pag 34).

The differences in opinion (about attractive ads) between the youth opinion panels (in the 5 participating countries) and the decisions of the (National) Advertising Code Committees illustrate the incompetence of self-regulation codes and the Advertising Code Committee's ability to identify and prohibit alcohol marketing practices that are appealing to minors (pag 37).

Obviously the most protective measure would be to implement a comprehensive EU wide, ban on alcohol advertising. Such a ban would ensure the effective regulation and restriction concerning the shifting of advertising, cross-border advertising and the occurrence of sponsorship of and product placement in television programs (pag 39).
