



Focus On: Alcohol Marketing



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Introduction

This Focus On provides an overview of alcohol marketing that describes current research evidence regarding the impact of alcohol marketing on different populations; highlights best practices in alcohol marketing policy; and identifies and discusses knowledge gaps to support future work in this area.

Alcohol marketing is pervasive in today's society and consists of sophisticated and integrated strategies aimed at creating positive beliefs about alcohol products and perceptions about its effects. Alcohol advertisements are no longer delivered only through traditional media like television and radio, print media, billboards and point-of-sale displays. Alcohol marketing has expanded to new media which includes product placement and alcohol content on televisions shows, movies and music; event, venue and scholarship sponsorships; charitable alignments; branded contests and merchandise; internet and short message service (SMS) advertising as well as user-generated social media content. It is estimated one half to two-thirds of alcohol advertising now makes use of new media. As such the alcohol marketing landscape is evolving from a passive presentation of advertisements (e.g., print media and billboards) to

a dynamic interface where consumers interact with and form relationships with brands.^{1,3} Additionally, marketing strategies are now informed by advanced statistical analytics targeting specific populations.⁴

Impact and scope of alcohol marketing

A robust body of evidence demonstrates alcohol advertising exposure influences drinking norms, perceptions and expectations around alcohol use, intentions to drink and drinking behaviours, especially among youth and young adults. ⁵⁻⁸ A number of sub-populations can be considered especially vulnerable to the negative impacts of alcohol marketing such as youth, women of child bearing age, people with impulsive or attention seeking tendencies, and those who are abstaining from alcohol for medical reasons or reasons related to dependency or family history of alcohol-related problems. ¹ Alcohol marketing influences drinking by associating alcohol with desirable attributes such as sexual prowess and sociability, and enjoyable activities like parties, celebrations, sports, and recreation. ⁹ Alcohol advertising exposure changes attitudes toward alcohol, promotes positive expectations about its use, and increases both intention to drink and subsequent drinking behaviour. ^{10,11} Alcohol marketing impact goes beyond the drinker, or potential drinker, influencing social standards that normalize drinking. ^{5,12}

Canadian data on alcohol marketing exposure are limited. Studies in the United States (US) and Australia have found that youth are exposed to alcohol marketing at rates equal to or greater than adults per capita. With the shift towards web-based marketing strategies that generally have ineffective age checks and often appeal to youth, exposure to alcohol marketing is expected to be even greater among youth populations. While there is no known recent Canadian data on the extent of alcohol marketing, a United Kingdom (UK) estimate from 2009 indicates the UK alcohol industry spent £800 million per year to promote the sale of alcohol. Evidence from the US indicates that each additional dollar per capita spent on alcohol advertising is associated with a three per cent increase in the number of drinks consumed. This relationship between advertising expenditure and alcohol consumption highlights the importance of monitoring alcohol advertising practices and exposure.

Alcohol marketing and alcohol availability

Given the public health impact of alcohol marketing it is important to ensure effective policies are implemented and enforced. Alcohol advertising may be linked with other factors that influence drinking, such as pricing and availability. Alcohol pricing influences purchasing and consumption behaviours, especially among high-risk drinkers whose current drinking pattern is harmful or puts them at increased risk for future harm. Examples of how pricing-based promotion, in combination with integrated advertising techniques influence consumer behaviour include table-top tent cards and sandwich boards in licensed premises or on newspaper inserts detailing sale prices and offering incentives such as rewards points.

Greater availability of alcohol through increased outlet density relates to increased alcohol consumption.²⁰ As the number of alcohol outlets (e.g. restaurants, bars, liquor stores etc.) increases, so does alcohol advertising.²⁰ In areas with high outlet density, ads on the outside or within these premises will likely be seen more often by potential consumers compared to those in low density areas. Bryden et al. found higher outlet density and greater local alcohol advertising exposure were associated with increased

alcohol consumption, especially among adolescents.²⁰ With high outlet concentration and basic supply and demand principles, greater competition leads to more aggressive marketing strategies such as price reductions.²¹ High-density, sale pricing and alcohol advertising combined can increase sales.

Regulating alcohol marketing: evidence of impact

There are several approaches to regulating alcohol marketing with different regulatory models, varying degrees of restriction, and different enforcement activities with the current regulatory environment including a combination of approaches. 1,2,22-25 Table 1 describes the varying degrees of restriction:

Table 1: Degree of alcohol advertising regulation 1,2,22-25

Models of regulation

- Mandatory, i.e. alcohol advertising controls are set in legislation
- Voluntary, i.e. industry follows a set of self-generated standards or pledges.
- No regulation, i.e. there are no restrictions or guidelines for alcohol marketing

Regulatory bodies

- Third party enforcement, i.e. a body, independent from alcohol industry, often government, monitors and enforces rules pertaining to alcohol advertising
- Self-regulation, i.e. the alcohol industry develops their own marketing guidelines and is responsible for monitoring and enforcing their own codes. This is common with voluntary restriction.
- No regulatory body oversees alcohol marketing practices

Levels of restriction

- Total restriction, i.e. legislated total ban on alcohol advertising
- Partial restriction, i.e. legislated ban on advertising certain products, media types or locations
- No restriction, i.e. no restrictions on alcohol marketing

Monitoring and enforcement

- Pre-clearance, i.e. ad storyboards are reviewed and advice is provided to ensure compliance with guidelines or regulations
- Active surveillance, i.e. a third party monitors all forms of alcohol marketing to ensure compliance and applies sanctions as necessary
- Complaint based monitoring, i.e. complaints can be submitted for review and penalties applied for those found in violation of guidelines or legislation

Historically, voluntary action and self-regulation by industry groups have been in response to public pressure regarding government regulation across a number of industries including tobacco, alcohol, motion pictures and the food industry.^{2,26}

To explain further, the tobacco industry developed a number of programs in response to objections to marketing practices targeting youth. These programs are prime examples of self-regulation used to deflect legislative action. ²⁶ These efforts included initiatives against youth access (i.e. *Action Against Access* and *We Card*), industry sponsored educational programs, partnerships (i.e. alliances sought with *Young Men's Christian Association* and *Boys and Girls Clubs*) and media campaigns. ^{26,27} Such initiatives were designed to avoid addressing the link between smoking and chronic disease which ensured they did not contradict with advertising messages, potentially encouraging young people to smoke. ²⁶ A similar trend was apparent in the self-regulation practices of the alcohol industry which developed programs targeting underage drinking and access not making mention of the link between alcohol and chronic disease and containing vague messages such as "please drink responsibly" that are associated with positive brand perceptions. ²⁵

At present, evidence suggests the alcohol industry is not adhering to self-regulation guidelines. ^{28,29} The impact is that self-regulation and voluntary codes fail to protect vulnerable populations such as youth ¹, persons in recovery, persons currently dependent on alcohol and non-drinkers from exposure to alcohol marketing. ^{2,30} In addition, self-regulation guidelines do not apply to all types of marketing e.g. ads delivered through SMS technology, internet ads, events sponsorship and branded merchandise. ³¹ The alcohol industry seems to interpret advertising codes more leniently than public health experts, highlighting the need for a pre-screening process to flag any alcohol advertisements that are deemed unacceptable according to the Canadian Radio-television and Telecommunications Commission (CRTC) code. ³² Furthermore, voluntary codes may be developed or changed to render previous violations acceptable, ^{26,28,30} or in times of economic downturn to protect industry profits. ²

There are few countries with effective strategies in place for restricting alcohol marketing.^{2,24} As a result it is difficult to evaluate whether strong legislative approaches will be too narrow to have an impact. For instance, in January 2015 Finland introduced new restrictions on alcohol marketing including a ban on alcohol advertising in public spaces, digital applications and games, and restrictions on brand interactions (i.e. likes and shares) via digital ads.¹ In France, the impact of the Loi Evin has yet to be evaluated.^{2,33} Table 2 summarizes the level of alcohol marketing restrictions of 64 different countries.²⁴

Loi Evin, passed in 1991, introduced a partial ban on alcohol advertising in France. The law requires the display of a health warning on alcohol ads, places restrictions on the types of media through which alcohol can be advertised and limits the ad content to information about the product.

Table 2: Level of alcohol marketing restrictiveness by country, 2008²⁴

Level of restrictiveness	n (%)	Countries
Least restrictive	23 (35.9)	Belgium, Benin, Cambodia, Chile, Comoros, Congo (Republic of), Czech Republic, Egypt, Eritrea, Guatemala, Guinea-Bissau, Malawi, Namibia, Netherlands, New Zealand, Niger, Philippines, South Africa, Suriname, Trinidad and Tobago, Uganda, United States of America, Zambia
Slightly restrictive	7 (10.9)	Australia, Austria, Bulgaria, Denmark, Malaysia, Malta, Portugal
Restrictive	16 (25)	Canada, Croatia, Ethiopia, Germany, Ghana, Israel, Italy, Kenya, Korea (Republic of), Lithuania, Panama, Russian Federation, Slovakia, Tanzania, Thailand, United Kingdom
Very restrictive	7 (10.9)	Belarus, France, Latvia, Seychelles, Slovenia, Turkey, Venezuela
Most restrictive	11 (17.2)	Algeria, Bosnia and Herzegovina, Iceland, India, Indonesia, Iran, Jordan, Norway, Poland, Sri Lanka, Sweden

Table 2 depicts levels of alcohol marketing globally using a scale to indicate restrictiveness with '2' meaning total restriction, '1' meaning partial restriction, and '0' referring to self-regulation/voluntary or no restriction. The scale generates a score ranking countries based on level of restrictiveness for alcohol marketing material. Each total score is a sum of three beverage specific restrictiveness scores for beer, wine and spirits as they appear in each of the eight different media platforms types (national television, private television, national radio, local radio, print, billboards, point of sale, cinema). The maximum total score a country could receive is 48, indicating each of the three specific beverage types recorded a '2' across all eight media types. Advertising codes studies suggest restrictions limiting alcohol marketing exposure through ad volume and placement controls rather than restrictions on ad content, are associated with reduced alcohol consumption^{5,17} and preventing underage audience targeting.²⁹ Conversely, voluntary ad content and placement restrictions have been shown to be frequently violated.^{1,29,32}

Media literacy and counter messaging

Alternative approaches to circumvent difficulties controlling alcohol marketing include media literacy³⁸ and social responsibility messaging initiatives.³² It has been argued that public health messaging could be one strategy used to balance the messages from the industry.⁹ However, this is not likely to be effective due to the complexity of marketing strategies used by the industry. In order to compete with commercial interests the public sector would need to, at minimum, employ a similar messaging strategy to that used by the private sector. It is unlikely that the substantial resources needed to promote and sustain the same level of health messaging would be available to the public sector.⁹

Alternatively, health warnings may be an attainable way to effectively inform the public about risks associated with alcohol use. 48 Regulated warning messages on products, at points-of-sale and on advertisements can balance alcohol industry messages. However, while warning labels on containers can be fully justified based on informing citizens of the health consequences of drinking alcohol, they have not had a significant impact on reducing high-risk drinking in the United States. 4 A more promising approach is to ensure all products and alcohol marketing materials contain warning messages about specific health and safety risks associated with drinking, replacing the 'please drink responsibly' slogan, and including a hyperlink to the low risk alcohol drinking guidelines. 1,35,36

Media literacy might be another approach to counter the impact of alcohol advertising. For example, recent research has found higher receptivity to alcohol marketing predicted the initiation of use.³⁷ Authors of the study used media literacy education to reduce adolescents' receptivity to alcohol advertising.³⁷

A comprehensive policy approach

Current alcohol marketing strategies have seen success being directed at vulnerable populations such as minority groups and there is evidence to support a restriction on marketing content. ^{25,39} Other policy levers that effectively target vulnerable populations are important in ensuring a comprehensive approach to reducing alcohol related harms. For example, controlling alcohol availability through price and minimum legal drinking age are effective ways to reduce consumption and harms amongst youth and may be especially important in an environment where alcohol marketing is pervasive. ²⁶

The policy landscape: Federal regulation of alcohol marketing

In Canada, alcohol marketing is regulated by both federal and provincial governments with local governments often supporting or extending this legislation through local by-laws or alcohol advertising guidelines embedded in their municipal alcohol policies.⁴⁵

At the federal level, alcoholic beverage advertising on television and radio is regulated by the <u>code</u> set by the Canadian Radio-Telecommunications Commission (CRTC). ⁴⁰ The CRTC code places content restrictions on alcohol broadcast advertising, including restrictions on advertising to youth and encouraging alcohol consumption or promoting certain lifestyles; however, these restrictions do not extend to other marketing media nor do they limit alcohol advertising volume. Table 3 below summarizes the CRTC code content restrictions last updated in 1996 based on four main policy changes:

- The prohibition on broadcast advertising for spirits was lifted.
- Anyone involved in the sale of alcohol could now advertise (e.g. restaurants).
- The requirement for pre-clearance of alcohol advertisements was removed.
- The responsibility for ensuring ads comply with the CRTC code was transferred to an industry supported agency, Advertising Standards Canada (ASC).⁴¹

These policy changes led to rising public health concerns with the main one being that the 1996 CRTC code has not sufficiently addressed the evolution of alcohol marketing trends since its inception.^{32,36}

Key CRTC code themes

- 1. Advertising must not encourage the general consumption of alcohol (Clauses A, I, K and N).
- 2. Advertising must not promote the irresponsible or illegal use of alcohol (Clauses H, J, O, P and Q).
- 3. Advertising must not associate alcohol with social or personal achievement (Clauses E, G and F).
- 4. Advertising must not be directed to persons under the legal drinking age (Clauses B, C and D).
- 5. Advertising must not associate alcohol with the use of motor vehicles or with activities requiring a significant degree of skill or care (Clauses L and M).
- 6. Contests and promotions cannot be conditional on the purchase or consumption of alcohol (Clause A).

Following reforms in 1996 responsibility for compliance with the CRTC code was transferred to ASC. In 1997, at the request of the alcohol industry and Canadian broadcasters ASC began a voluntary screening process to ensure advertisements complied with CRTC code. 41 Upon request, ASC will pre-screen broadcast, print, web advertising and promotional materials under AGCO Guideline provisions.

The policy landscape: Provincial regulation of alcohol marketing

In addition to federal CRTC code, Ontario regulates alcohol advertising by liquor manufacturers, licensees, ferment on premise operators, liquor delivery license holders and special occasion permit holders through the Liquor Licence Act. ⁴³ Province-specific guidelines place restrictions on alcohol advertising and marketing across a range of advertising mediums beyond broadcast advertising, including television, radio, billboards, posters, etc., and are outlined in the <u>Alcohol and Gaming Commission of Ontario (AGCO) Liquor Advertising Guidelines: Liquor Sales Licensees and Manufacturers</u>. ⁴⁴ In addition to AGCO guidelines, the Liquor Control Board of Ontario (LCBO) marketing materials depict drink sizes consistent with Canada's low-risk alcohol drinking guidelines and portray alcohol consumption in the context of social situations or paired with a meal. When selecting products to be listed in their outlets the LCBO reviews product labels for derogatory gender references, political and cultural sensitivities, and references to dependency issues to ensure all products are compatible with their social responsibility mandate (personal communication, Vincent Caron, Senior Policy Advisor, LCBO, April 29th, 2016). In general, the Ontario liquor advertising guidelines and social responsibility mandate of the LCBO appear more restrictive than the CRTC code; however, the AGCO guidelines were implemented in 2011 and have not been updated to reflect recent alcohol promotion trends.

Controlling alcohol advertising at the local level

To strengthen alcohol marketing policies and tailor them to local context, municipalities in Ontario have incorporated alcohol advertising restrictions that go beyond the CRTC code and AGCO advertising guidelines into their MAPs. For example, the City of Toronto Municipal Alcohol Policy stipulates:

"Events sponsored by alcohol manufacturers must include messages about responsible consumption of alcohol." ^{45(p.15)}

"Event names which convey the message that drinking is the principal activity or the purpose of the Event are not permitted." $^{45(p.15)}$

Tailoring alcohol advertising policies to the local context through MAPs and local by-laws may help ensure advertising messages do not undermine public health units' work to reduce alcohol-related issues.

Recommendations to support public health

Alcohol marketing restrictions are a cost effective way to reduce alcohol-related harms. ^{46,47} While the World Health Organization (WHO) calls for an alcohol advertising ban ⁴⁶ the strongest, more feasible, model for regulating alcohol marketing is likely to be one in which government establishes and updates regulatory systems to reduce alcohol marketing exposure and monitor all forms of marketing. ²⁴ Research recommends that the alcohol marketing regulatory framework provides a legislative basis to regulate:

Marketing content–This should be limited to factual information with regards to qualities of the product. This type of control helps protect consumers against misleading information and helps protect young people from attractive advertisements.³² Requiring standardized statements about the impact of alcohol use on health is recommended along with a clear definition of "responsible drinking" according to lowrisk alcohol drinking guidelines.^{9,25,36}

Volume of marketing—Restricting quantity and location of ads is necessary to minimize exposure to a high volume of alcohol ads and their subsequent impact on drinking behaviours and perceptions. ^{32,48} For example, on-site advertising could avoid permitting alcohol advertising when over 25 per cent of attendees are below the legal drinking age, or permit it only to a limited amount of all advertising space—for example, sports venues or airtime. ²⁹ Restricting time of day when advertisements appear helps control the total ad volume and can limit youth exposure to ads. ^{14,29} Television and radio advertising could be allowed during a time of day (evening) when most viewers (75 per cent) are above the minimum legal drinking age, and shown only after that time until very early morning. ^{14,29} Restricting where (venues, events, sponsorships or forms of advertising media) ads are displayed can limit exposure to youth and vulnerable populations and reduce overall volume of alcohol marketing. ^{36,49,50} For example, banning alcohol ads on public transit, near schools, places of worship, hospitals, or near addiction treatment facilities, at community events or venues not exclusively for adults over the legal drinking age, or on social media platforms and websites not exclusively targeting adults. ^{33,49}

Types of marketing–Marketing across all types of media should be monitored and this regulation should be flexible to address new and emerging forms of media.^{25,32} This legislative framework needs to be supported by an effective monitoring and enforcement system including: ^{1,32,51}

- third party pre-screening that reviews ad storyboards to ensure compliance with regulations and provide advice when required criteria are not met
- active alcohol marketing surveillance that ensures legislation is implemented as intended

- process for lodging complaints when a campaign does not meet requirements
- escalating sanctions for marketing restriction infringements
- monitoring of the effectiveness of the restrictions and evaluates the impact of restrictions on alcohol advertising exposure, volume, and content

Recommendations for local action

According to a 2014 survey aimed at identifying current actions, barriers and facilitators to address alcohol-related harms for Ontario PHUs restriction of alcohol marketing was among the top three most important issues PHU representatives felt were not being addressed.⁵² PHU representatives also indicated that the lack of alcohol marketing restrictions were a barrier to addressing alcohol related harms especially among youth.⁵² Below are four ways PHUs can support alcohol marketing policy development.

- 1. Support for stronger alcohol marketing policies: PHUs can align with other stakeholders to support greater marketing restrictions at provincial and federal levels.⁵² This could be done by giving policy makers evidence of the impact of marketing practices, evidence-informed policy response options, and providing local data on alcohol marketing practices.
- 2. Controlling alcohol marketing at the local level: PHUs can support MAPs and local by-law restrictions on alcohol marketing practices at the community level to strengthen local alcohol marketing control policies—for example, MAPs may ban alcohol advertising and sponsorship on municipal properties and for municipal events.
- 3. Reducing the impact of alcohol marketing practices: PHUs can educate youth and other vulnerable populations in media literacy including how to lodge a complaint about ads and marketing practices. PHUs may consider promoting counter messages telling consumers about harms associated with alcohol use through various media channels.
- 4. Supporting a comprehensive approach to alcohol policy: Alcohol marketing practices span other policy areas including pricing and outlet density. PHUs can help ensure a comprehensive approach by informing policy makers about links between alcohol marketing, availability and price.

Future areas of research to support public health

There is a need to better understand the alcohol advertising landscape in Canada and Ontario to support healthy public policies around alcohol marketing. Currently, there is more information from other countries compared to Canada for both alcohol advertising costs and exposure of vulnerable populations to alcohol advertising. An alcohol advertising monitoring system would help assess alcohol advertising exposure to Canadians and Ontarians and the impact of ad volume on consumption and alcohol-related harms. Gaps in knowledge about the exposure to and impact of alcohol marketing in specific populations and contexts include: advertising to youth, women, and vulnerable populations, alcohol messaging in television, movies and music and alcohol advertising on social media. These are important areas for understanding the extent and impact of alcohol marketing in Ontario and to help inform the creation of healthy public policies.

Conclusion

Alcohol marketing, advertising and sponsorship is a growing public health concern. Through the use of sophisticated and diverse tactics, ^{3,4} alcohol marketers are able to target vulnerable populations such as new drinkers, minorities and youth. ^{3,39} Although there are some controls in place to tackle this issue more can be done. ^{2,32,36,51} From a population level a regulatory framework that controls the marketing content of alcohol advertisements limits the volume of alcohol marketing and regulates the platforms for alcohol advertising is recommended. ^{25,32,48} On a local level PHUs can play an active role in supporting restrictions on the expansion of alcohol outlets and marketing practices. Through a combination of stronger support directed at alcohol marketing policies and increased control over alcohol marketing local PHUs have the ability to influence the development of an alcohol marketing policy. ⁵² Future research should be directed towards documenting the scope and impact of alcohol advertising on different sub-populations.

Resources

- Canadian Radio-television Telecommunications Commission (CRTC) <u>code</u> for broadcast advertising of alcoholic beverages
- Alcohol and Gaming Commission of Ontario Liquor and Advertising Guidelines
- Public Health Ontario-Alcohol Policy resources
- Locally Driven Collaborative Project

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Authors

Norman Giesbrecht, PhD, Senior Scientist Emeritus, Centre for Addiction and Mental Health Ashley Wettlaufer, MA, Research Coordinator, Centre for Addiction and Mental Health

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