



Institute of Practitioners in Advertising

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13 March 2003

Dear Mr Greening

National Harm Reduction Strategy Consultation

The Advertising Association has made a formal submission in response to this consultation before the January deadline on behalf of its members, including the IPA. We endorse the AA submission wholeheartedly. However the IPA wishes, belatedly, to comment on a couple of additional issues.

1. Background to IPA

Briefly the IPA is the trade association and professional institute for UK advertising agencies. Our 224 corporate members are primarily concerned with providing strategic advice on marketing communications, including creating and/or placing advertising. Based throughout the country, they will be responsible for over 80% of the UK's advertising agency business with an estimated value of £7 billion in 2001 – as well as playing a pivotal role in advising the nation's companies on how they should deploy their total marketing communications spend of £42 billion (source: IPA Bellwether Report, April 2002).

2. Alcohol Advertising

The IPA and its members recognise, endorse and uphold the need for responsible marketing communications and indeed the advertising industry has played a vital role in communicating important messages about safety and drink driving.

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The IPA would like to endorse many of the recommendations in the Portman Group Response to this consultation and in particular we wish to make the following recommendations that were not referred to in the AA Response:

- There should be stricter interpretation of present regulations by the BACC in relation to television commercials and by the ASA in relation to print advertising. Having discussed this with the BACC there is some concern that the Codes have not been significantly amended for many years and attitudes change as society evolves. The BACC finds itself with its hands tied in many instances. We encourage independent research into the affect of alcohol advertising and subsequently a review of the Codes if it is then considered appropriate.
- Better re-branding and communication by the Government of its Responsible Drinking Campaign should be encouraged.
- "Health Warnings"

A non-prescriptive message about responsible drinking in alcohol advertising ought to be considered. The IPA does not endorse prescriptive "health warnings" which have proved to be ineffective in tobacco advertising and other areas. It is also counter productive to introduce measures, such as health warnings, which irritate and penalise the vast majority of consumers who drink moderately and responsibly. Nevertheless the adoption of responsible drinking messages in alcohol advertising is a possibility that our members would embrace and which would make it easier for regulators to act against "rogue" advertisers.

There has been a substantial debate in the US about the efficacy of health warnings and recently warnings in the US have been called into question due to recent scientific evidence that moderate drinking is good for the health.

Health warning label legislation was implemented in the US in 1989 and thereafter The National Institute for Alcohol Abuse and Alcoholism funded research on the impact of the warning labels. The results were inconclusive and depend largely on what one believes the labels were supposed to achieve, however, the US Journal of Public Policy and Marketing found at the close of the research in 1993 that "*there was little evidence that might suggest changes attributable to the warning label*". *

In Canada there have been similar experiments and conclusions that health warnings do not have a large effect on behaviour. While a few other countries

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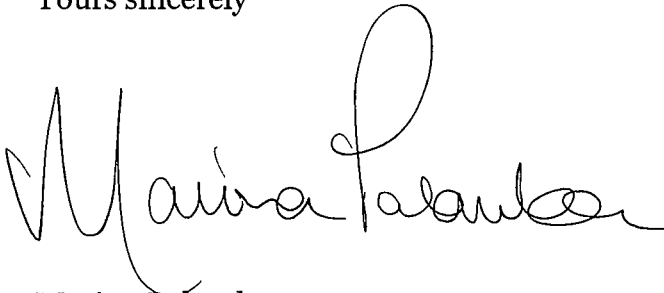
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have adopted health warning legislation only the US has undertaken wide analysis of the effect of such warnings.

It is the opinion of the IPA and its members that prescriptive "health warnings" are ineffective and inappropriate. Accurate information ought to be communicated by government funded awareness campaigns.

Self-regulation is a far more effective means of ensuring flexible and effective control ensuring the public are provided with all relevant information about a product.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Marina Palomba". The signature is written in black ink and is positioned above the typed name and title.

Marina Palomba
Legal Director