

ITC response to DoH consultation on National Alcohol Harm Reduction Strategy

1. The ITC licenses and regulates all UK-based commercial television services. In practice, this includes all commercial services with any significant UK audiences. Established by the Broadcasting Act 1990, the ITC is currently the statutory regulator of TV advertising and we require the television companies to comply with both the letter and the spirit of our advertising code.
2. We would like to comment on Q50, about the regulation of alcohol advertising.
3. Comprehensive rules, covering both advertising which directly promotes alcohol products and any other advertising which features or refers to drinks or drinking, are in Section 11.8 of our Advertising Standards Code which can be found on our website www.itc.org.uk.
4. As far as children and young teenagers are concerned, the objectives of the rules are to prevent TV advertising encouraging them:
 - to start to drink sooner than they otherwise would
 - to drink more than they otherwise would
 - to think that drinking alcohol is a badge of some kind (for example, a sign of maturity)
 - to treat alcohol in a way which is antisocial or is harmful to themselves

The rules also aim to prevent advertising condoning or encouraging self-destructive or anti-social drinking amongst older audiences.

5. The rules therefore prevent alcohol advertising from, for example, showing social interaction being enhanced by the consumption of alcohol or drinking being shown as a way of improving physical or other performance. They also prevent the encouragement of various forms of unwise drinking behaviour such as binge drinking, regular solitary drinking or aggression linked to drinking.
6. For a good many years we have maintained contact with organisations such as Alcohol Concern and the industry self-regulatory body, the Portman Group, so that we are informed on issues about alcohol use and abuse.
7. Business reality dictates that companies within the alcoholic drinks industry must appeal to successive new generations of drinkers. We must ensure that, at least as far as TV advertising is concerned, this appeal is not aimed too young, and never at under-age drinkers, or in a harmful way. We receive very few complaints each year about alcohol issues in TV commercials – typically no more than half a dozen out of, in 2002, around 7000 - but we are also aware of the widespread, and currently growing, public concern about the abuse of alcohol, particularly amongst children and teenagers.
8. As in our other areas of responsibility, we are therefore always open to constructive suggestions about our rules and policies. Coincidental with your consultation, we will

soon receive a report on a major, comprehensive review we have commissioned of all the available independent, peer-reviewed research into the factors which influence young people's attitudes to drinking. This will be another opportunity to test our policies to ensure they are relevant and effective. The report will be published but, at this stage, it is not possible to say when.

9. In late 2003 or early 2004, a new body, Ofcom, will replace the ITC and four other regulators. It will have regulatory responsibility for both radio and television content. Ofcom will wish to develop its own codes, and the ITC will want to be in a position to offer Ofcom advice based on its experience. The research work will no doubt be helpful in that.