

Consultation on Product Placement on Television

Response from Alcohol Concern to the Department for Culture, Media & Sport

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Alcohol Concern

Alcohol Concern is the national agency on alcohol misuse campaigning for effective alcohol policy and improved services for people whose lives are affected by alcohol-related problems.

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1. About Alcohol Concern

1.1 Alcohol Concern is the national agency on alcohol misuse campaigning for effective alcohol policy and improved services for people whose lives are affected by alcohol-related problems.

1.2 Alcohol Concern is a membership body working at a national level to influence alcohol policy and champion best practice locally. We support professionals and organisations by providing expertise, information and guidance. We are a challenging voice to the drinks industry and promote public awareness of alcohol issues.

2. Product Placement Consultation

2.1 Alcohol Concern welcomes the opportunity to comment on the Department's reconsideration of the prohibition of product placement on UK television.

2.2 However, Alcohol Concern is disappointed that the time period set for the consultation has fallen short of the 12 weeks recommended in the Cabinet Office 'Code of Practice on Written Consultation' (Criterion Five, Paragraph Two), being opened on 9 November 2009 and closed on 8 January 2010. Furthermore, Criterion Five, Paragraph Four states that 'an otherwise adequate period may be less so if a substantial holiday period falls within it', as has been the case with regard to this consultation. We are concerned that this may have restricted the ability of organisations, particularly small organisations experiencing pressure on resources, to respond to the consultation.

3. (Q.15) Should all or any product placement be restricted or prohibited in programmes with a disproportionately high child audience?

3.1 Assuming that a 'disproportionately high child audience' would be measured using the same method as that for alcohol advertising, Alcohol Concern does not agree that such a restriction would be adequate to protect children and young people from product placement of alcohol products in accordance with the World Health Organisation's European Charter on Alcohol. This states that 'all children and adolescents have the right to grow up in an environment protected from the negative consequences of alcohol consumption and, to the extent possible, from the promotion of alcoholic beverages.'¹

3.2 The BARB Conversion Index is currently used to determine whether alcohol advertising should be shown around certain programmes. If the proportion of children watching a programme is more than 20% higher than the proportion of the UK television population as a whole watching the programme (or in other words, a programme achieves a Conversion Index of 120 or higher), the programme is defined as one which attracts a significantly higher than average proportion of viewers in that age group and, for the purposes of regulating the scheduling of TV advertisements, is said to be of particular appeal to an under 18 audience. If this is the case, alcohol advertising is not show around this programme.

¹ World Health Organisation European Charter on Alcohol (1995)

3.3 However, this method does not fulfil the objective of protecting children from alcohol advertising, for the following reasons:

3.4 BARB considers an 'adult' to be anyone aged 16 or over, therefore 16 & 17 year olds are not included as 'children' and therefore not counted when ascertaining whether a programme is of particular appeal to children. This means that alcohol adverts are being shown in programmes 'likely to appeal' to under 18 year olds, even if they are not 'likely to appeal' to 15 year olds and under. This seems questionable considering that 16 & 17 year olds are also too young to be able to buy alcohol. We have further concerns, and seek clarification on, the situation (as it seems) that BARB uses an audience profile of 10-15 year olds in order to determine whether a programme is likely to appeal to children. This would assume that, like 16 & 17 year olds, under tens aren't included in the calculation. We would suggest that this does not allow for a clear picture of exactly how many under 18 year olds are watching a particular programme and therefore assessments of whether alcohol adverts should be shown can be inaccurate.

3.4 A programme which is not specifically designed for children, such as Coronation Street or Britain's Got Talent is still likely to have a high number of underage viewers who are then exposed to alcohol advertising. This criterion is therefore quite inadequate in terms of protecting minors from alcohol advertising. Figures to demonstrate this circumstance are shown in the table below.

3.5 Alcohol Concern, funded by the Alcohol Education Research Committee conducted its own research into this matter in 2007². We carried out research into the scheduling of alcohol adverts during two weeks (December and March) to ascertain how many were featured before the watershed of 9pm. Our study showed that in the week researched in December 2006, there were more than 350 alcohol adverts shown before the 9pm watershed. In terms of supermarket alcohol adverts, there were twice as many shown before the watershed than after. The research also showed a spike in alcohol advertising between 3 and 6pm, a time of day at which, we would argue, children are more likely to be watching television than adults.

3.6 Alcohol Concern's research found alcohol being advertised within programming that appeals to children. The three programmes had a proportion of young viewers which did not break the 120 Index rule (based on number of 15s and under viewing). However, due to high viewing figures, this reflects a significant actual number of young people.

² Alcohol Concern (2007) 'Not in Front of the Children'

Programme	Advertiser	Products	Channel	Date/Time	% of 4-19 year olds viewing	Actual number of 4-19 year olds viewing
The X Factor	Morrisons	2 x pack Grolsch for £16	ITV	17/12/06 13.53	18.18%	6,000
Home & Away	Morrisons	2 x pack Grolsch for £16	Channel 5	11/12/06 18.13	12.67%	237,300
Coronation Street	Lidl	Low price wine	ITV	15/12/06 19.46	11%	1,126,000

Source: Mediametrie/Xtreme Information/Eurodata TV/BARB/ TNS UK

3.8 Taking the above factors into account, Alcohol Concern therefore suggests that such a strategy should not be extended to determine whether product placement should be allowed during certain programming.

4. (Q.24) Should television placement of alcohol, HFSS foods or gambling be subject to an outright prohibition; or, if not prohibited, should it be subject to restrictions of some kind?

4.1 Alcohol Concern notes that the AVMS Directive requires that the placement of alcoholic drinks products in television programming must not be aimed specifically at minors and must not encourage immoderate drinking. However, we are concerned that neither this caveat nor the application of the BCAP code on advertising to product placement are adequate to ensure that the use of product placement would not contribute to the rising level of alcohol harm in the UK. Evidence as cited below shows children and young people are influenced by exposure to alcohol advertising itself, regardless of the targeting or messaging contained in those adverts. Therefore, Alcohol Concern supports a prohibition on the product placement of alcoholic drinks. This should extend to props which promote alcoholic drinks brands, e.g. through the use of slogans, logos or other branding.

4.2 Product placement is a form of advertising and, while there is little specific evidence in relation to the effect on the public of product placement, there is a growing body of evidence with regard to the effect of alcohol advertising, particularly on young people.

4.3 Alcohol Concern would particularly like Department to note evidence contained in the influential report from the University of Sheffield School of Health and Related Research, published in December 2008³, on the effects of alcohol advertising. Statement Five of this review states that ‘there is conclusive evidence of a small but

³ Meier et al, School of Health and Related Research, University of Sheffield (2008) ‘Independent Review of the Effects of Alcohol Pricing and Promotion’

consistent association of advertising with consumption at a population level. There is also evidence of small but consistent effects of advertising on consumption of alcohol by young people at an individual level'. While we agree that further research into both the effects of advertising and product placement would be helpful to further understand this complicated issue, the evidence already presented suggests an association between the promotion of alcohol and increased consumption and harm.

4.4 The ScHARR authors also note that 'consumer studies also provide increasing evidence that exposure to alcohol advertisements increases initiation of alcohol use amongst adolescents. These can be ranged alongside evidence from econometric studies with a majority finding a positive association between the volume of advertising and drinking behaviour and outcomes'.

4.5 Such conclusions should be understood in the context of young people's drinking in the UK, which continues to be a significant problem. There has been a 57% increase in alcohol-related deaths amongst young people aged 15-34 between 1991 and 2006/7.⁴ Accidents, suicide and violence are significant causes of death in the 16-25 age groups, and alcohol is often implicated in all three.⁵ The European School Survey Project on Alcohol and Drugs 2007, published in March 2009, showed that 15 and 16 year olds in the UK had the third highest level of alcohol consumption on the last drinking day of all countries surveyed, behind the Isle of Man and Denmark (the latter in fact having limited comparability). The UK also had the third highest level of youngsters having reported being drunk in the past 12 months and the third highest level of youngsters having reported being drunk in the past 30 days. The UK, importantly, also recorded the third highest rate of youngsters experiencing problems associated with alcohol use, such as individual problems, relationship problems, sexual problems and delinquency. Yet at the same time, youngsters in the UK were more likely than those in any other country to expect positive consequences as a result of their alcohol consumption. Alcohol Concern believes that the disparity between teenagers' expectations surrounding the experience of drinking alcohol and the reality may in part be attributed to the comparatively low level of restriction of alcohol promotion in the UK.

4.6 Alcohol Concern believes that, in addition to that provided by ScHARR, there is further evidence which should be taken in consideration. A research experiment led by Rutger Engels, Professor in Developmental Psychopathology at the Behavioural Science Institute, Radboud University Nijmegen in The Netherlands, was published in February 2009⁶. It involved the first controlled, randomised experiment into whether exposure to alcohol on television affects immediate drinking behaviour. Some respondents were exposed to alcohol advertising and portrayals of drinking on television, for examples characters in a film seen drinking at a party.

4.7 The research team concluded that 'this study shows a causal link between exposure to drinking models and alcohol commercials on acute alcohol consumption'. They went on to state that 'results were straightforward and substantial: those in the condition with alcohol portrayal in movie and commercials

⁴ Department for Children, Schools and Families (2008) Youth Alcohol Action Plan

⁵ Acheson, D. (1998) Independent inquiry into inequalities in health report

⁶ Engels et al (2009) 'Alcohol Portrayal on Television Affects Actual Drinking Behaviour', *Alcohol and Alcoholism*, Vol 44, No 3, pp 244-249

drank on average 1.5 glasses more than those in the condition with no alcohol portrayal.' The authors pointed to three potential underlying mechanisms for a direct link between alcohol portrayals and individual alcohol use. The first of these is 'the positive portrayal of substances in a positive way by using prototypes of the 'ideal' person in an appealing context'. Secondly, they point to an association made by the viewer between a specific cue or event and a specific behaviour pattern, which may become habitual and automatic behaviour. Thirdly, alcohol portrayals may lead to drinking as a result of imitation. They note that previous research in this area strongly supports the assumption that an individual drinks at a quicker pace when in the company of another person who is drinking. This may also apply to watching a person on a screen, for example in an alcohol advert.

4.8 This study is important because it is generally assumed that advertising primarily works by changing attitudes of consumers and behaviour in the long term, this study shows that short term behaviour is also affected. Furthermore, it is considered that exposure to advertising messages should occur several times in order to effect this process. Given the fact that many people – including children of course - watch television at home and have the opportunity to drink, direct effects may account for some consumption.

4.9 A further study was conducted by Anderson, Bruijn, Angus, Gordon & Hastings and published in Alcohol and Alcoholism in January 2009. 'Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies'⁷ reviewed 13 studies that measured exposure to advertising and promotion. 12 of the 13 studies concluded an impact of exposure on subsequent alcohol use, including initiation of drinking and heavier drinking among existing drinkers. The authors also noted a 'dose relation response' – the greater the exposure to advertising, the greater the impact. They do recognise, as does Alcohol Concern, that alcohol advertising is simply 'one of the many factors that have the potential to encourage youth drinking', but they conclude that 'alcohol advertising and promotion increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol'.

4.10 In an article published in The Lancet⁸ in June 2009, Anderson, Chisholm & Fuhr drew on a substantive evidence base of systematic reviews and meta-analyses in order to assess the evidence for the effectiveness of policies and programmes to reduce harms caused by alcohol. In the target area of marketing alcoholic beverages, they note that 'the effects of exposure seem cumulative and, in markets with greater availability of alcohol advertising, young people are likely to continue to increase their drinking as they move into their mid-20s, whereas drinking decreases at an earlier age in people who are less exposed to it.' They go on to conclude that 'policies that regulate the environment in which alcohol is marketed (economic and physical availability and commercial communications) are effective in reducing alcohol-related harm.'

4.11 The Science Group of the European Alcohol and Health Forum adopted the report of its dedicated working group on the issue of alcohol marketing in February

⁷ Anderson et al (2009) Alcohol and Alcoholism Online, January 2009, pp.1-15

⁸ Anderson et al (2009) The Lancet, Vol 373, pp 2234-46

2009⁹. They concluded that although not all studies found an impact for all types of marketing exposures, ‘the overall description of the studies found consistent evidence to demonstrate an impact of alcohol advertising on the uptake of drinking among non-drinking young people and increased consumption among their drinking peers.’

5. Conclusion

5.1 Any changes to the rules on product placement in UK television should supersede the inadequate safeguards outlined by the AVMS Directive by specifically prohibiting the placement of alcoholic drinks or associated products, in order to support the Government’s strategy to reduce alcohol-related harm in the United Kingdom and the World Health Organisation principle that children should be protected from the promotion of alcoholic beverages.

⁹ Science Group of the European Alcohol and Health Forum (2009) ‘Does marketing communication impact on the volume and patterns of consumption of alcohol beverages, especially by young people? – A review of longitudinal studies.’