



promoting responsibility,
reducing harm, changing culture

Alcohol Focus Scotland's Response to *Product Placement on Television* Consultation by the Department for culture, media and sport – January 2010

Alcohol Focus Scotland is the national charity in Scotland for alcohol issues.

Alcohol is one of the biggest health problems that this country is facing with the continuous increase in alcohol related harm in health, social and criminal justice areas.

In recent years, alcohol issues have gained a much higher public profile, just as the indicators of alcohol-related harm like liver cirrhosis and alcohol-related deaths have been rising.

We believe tackling our alcohol problems requires a change in culture. To help achieve this culture change, our work involves providing information and training on alcohol issues, raising awareness of alcohol-related problems, and influencing national alcohol policy.

Alcohol Focus Scotland is committed to improving the quality of people's lives by changing Scotland's drinking culture - promoting responsible drinking behaviour and discouraging drinking to excess.

Alcohol Focus Scotland considers that product placement of alcohol and alcohol related products should be prohibited because of the significant social and health harms associated with its misuse.

.....

Consultation Questions:-

Q2 – How should those additional safeguards be imposed - by law or means of the Ofcom code?

Alcohol Focus Scotland believes that the Ofcom role would be significantly strengthened if it were to take a proactive rather than reactive role. Taking action once complaints have been received is too late, viewers have already been ‘exposed’ to the advertising or promotional communication which is the subject of the complaint.

Q24 - 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?

Alcohol is not an ordinary commodity – its consumption can have a significant bearing on health & wellbeing, unlike other ‘goods’ such as shoes, cars, watches etc. Alcohol Focus Scotland takes the view that television placement of alcohol related products should be prohibited.

Product placement is a form of advertising on which the industry currently spends in the region of £800m each year, advertising and promoting their products. Respected organisations such as the World Health Organisation (WHO) have stated that the content of alcohol marketing and the amount of exposure to it are critical issues for young people, who are particularly susceptible to alcohol’s harmful effects.¹

“Alcohol consumption in the UK has increased rapidly in recent years, not just among young people, but across society. The population is drinking in increasingly harmful ways and the result is a plethora of avoidable medical, psychological and social harm, damaged lives and early deaths. As consumption has increased, so the market for alcohol has grown. In 2007, sales (including supermarket, off-licence, restaurant and bar sales) were high enough to put virtually every British adult over government guideline drinking levels. These sales are driven by vast promotional and marketing campaigns that dwarf health promotion efforts: the UK alcohol industry spends approximately £800m each year encouraging consumption of its wares.”²

While the future of television production may be influenced by competitive commercial pressures, we consider that allowing alcohol products similar advertising opportunities to producers of other goods ignores the proven links between alcohol advertising and the risk of potential harm to our health and social wellbeing by advertising alcohol.

¹ World Health Organisation, 2009. Handbook for action to reduce alcohol-related harm.

² British Medical Association, 2009. Under The Influence – the damaging effect of alcohol marketing on young people.

Q25 - *If it is not practicable to apply the detail of the BCAP Code rules on alcohol advertising to alcohol product placement, would the simple AVMS Directive rules that alcohol advertising must not be aimed specifically at minors and must not encourage immoderate consumption provide adequate safeguards?*

No. There needs to be a very clear prohibition of product placement for alcohol and alcoholic products, with the same exemption as that which applies to cigarettes and other tobacco products (section 4, No 6 vii of consultation) and also medical products and treatments available only on prescription (viii of consultation).

The consultation document highlights that children are viewing programmes that would not be considered as 'children's programmes' (examples given were *X Factor* and *I'm a celebrity* etc.) therefore potentially exposing children to products that are non age-appropriate. Given that the consultation document also highlights the complexities around product placement and scheduling e.g. product placement deals can be struck before a programme is made, with no accurate assessment being made if a programme might be suitable for children and then the added practical difficulties of removing such products, should it later be agreed that children will be interested in programme.

Furthermore, this question ignores the key issue of **exposure** to advertising, including product placement, for it is the influence of exposure to advertising rather than targeting which influences the viewer. The availability of 'watch whenever you like' internet sites that most television channels now have, renders the approach of simply considering broadcast times for age related programmes obsolete since children can access programmes at any time of day. This means that the potential for age inappropriate exposure to advertising is significantly increased, since many programmes can be viewed at any time of day by anyone able to access the internet.

Given that it is now extremely difficult to predict when a viewer is exposed to television programmes and that age verification schemes are easily undermined, it is impossible to ensure effective risk minimisation standards and procedures; therefore Alcohol Focus Scotland recommends prohibition.

Jack Law
Chief Executive
Alcohol Focus Scotland
2nd floor, 166 Buchanan St
Glasgow G1 2LW

Tel: 0141 572 6700
Email: enquiries@alcohol-focus-scotland.org.uk
Web: www.alcohol-focus-scotland.org.uk
7th January 2010