



**Department for Culture, Media and Sport - Consultation on Product Placement on Television - January 2010**

**Consultation response from the Alcohol Health Alliance**

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**1. The Alcohol Health Alliance**

The Alcohol Health Alliance UK is a group of 24 organizations whose mission is to reduce the damage caused to health by alcohol misuse and who are working together to:

- Highlight the rising levels of alcohol-related health harm
- Propose evidence-based solutions to reduce this harm

- Influence decision makers to take positive action to address the damage caused by alcohol misuse

While coalitions have previously been formed on specific topics in the medical field, notably tobacco control, this is the first time that a group has existed specifically to co-ordinate campaigning on alcohol, bringing together medical bodies, patient representatives and alcohol health campaigners.

## **2. Members of the Alliance:**

Academy of Medical Royal Colleges, Action on Addiction, Alcohol and Health Research Trust, Alcohol Concern, Alcohol Focus Scotland, British Association for the Study of the Liver, British Liver Trust, British Society of Gastroenterology, College of Emergency Medicine, Faculty of Occupational Medicine, Faculty of Dental Surgery, Faculty of Public Health, Institute of Alcohol Studies, Medical Council on Alcohol, National Addiction Centre, National Organization on Fetal Alcohol Syndrome, Royal College of General Practitioners, Royal College of Nursing, Royal College of Physicians Edinburgh, Royal College of Physicians London, Royal College of Physicians and Surgeons, Glasgow, Royal College of Psychiatrists, Royal College of Surgeons London, Royal Pharmaceutical Society, Scottish Intercollegiate Group on Alcohol

## **3. Introduction**

The Alliance welcomes the opportunity to respond to this consultation on future regulation of product placement on television in the UK.

### **Our view**

The effects of over-consumption of alcoholic drinks make a considerable contribution to ill health and premature death in the UK. Advertising for these

products undermines public health messages and particularly influences children, who are more susceptible to marketing messages.

Allowing product placement in UK-made television programmes will open a range of new opportunities to promote products that are linked to one of our most severe public health problems alcohol abuse. The consequences for the health of the nation could be severe if demand for the products associated with these problems rises as a result of the increase in surreptitious marketing for them.

Any relaxation of restrictions on product placement will severely undermine the effectiveness of the current AVMS Directive exemptions on dedicated children's programming as a large proportion of children's viewing now takes place outside this, especially during early evening programmes and game shows. Therefore, from a public health point of view, we believe that there can be no justification for abandoning restrictions on product placement of alcoholic drinks when public and professional expectations are that the population should be subject to less, not more, promotions for these products.

#### **4. Alcohol misuse and advertising**

There is growing evidence to show a link between exposure to advertising and increases in consumption. Behavioural studies show that the more aware and appreciative young people are of alcohol advertising; the more likely they are to drink now and in the future. The Academy of Medical Sciences report 'Calling Time' showed a significant correlation between consumption levels by 11-15 year olds and the amount spent on advertising<sup>1</sup>. A recent systematic review to assess the impact of alcohol advertising and media exposure on future adolescent alcohol consumption found that exposure to media and commercial communications on alcohol are linked to increased likelihood of drinking in adolescents and baseline drinkers<sup>2</sup>. The Science Group of the European Commission's Alcohol and Health Forum recently concluded that alcohol marketing increased the likelihood that non-drinking young people will start to drink, and the likelihood that existing young drinkers will drink in a more risky

fashion<sup>3</sup>. A systematic review by Meier et al found that ‘there was conclusive evidence of a small but consistent association of advertising and 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<sup>4</sup>

## **5. The evidence base on the impact of product placement**

The current evidence base shows that product placement within television and movies can influence consumers in three key ways<sup>5</sup>:

- Enhance recognition of the target brand via repeat exposure

A number of studies have demonstrated that product placement in film and television can improve consumers recall and recognition of particular brands compared with the same brand that has not been placed in this way<sup>6</sup>

- Promote favourable brand attitudes through character/brand association

Research has also shown that product placement can promote favourable brand attitudes and associations in consumers. Dalton et al found that exposure to characters drinking in films encouraged young people to begin to drink<sup>7</sup>.

- Encourage purchase intentions and behaviour

Product placements in television and films can also influence consumer’s brand choices and preferences.

The research around product placement also shows that product placements that are more discreet and not obvious can have a greater impact; and that audiences are subliminally influenced by brands that have been placed in television programmes<sup>8</sup>. This raises major questions about the ethics of product that the Government must consider.

## **6. Responses to specific questions**

### **1. What if any, viewer and other safeguards should there be additional to those required by the AVMS Directive?**

We are not convinced that that even with current restrictions that children will in reality be adequately protected from exposure to alcohol advertising. We would therefore recommend that the current ban on product placement for alcoholic products in British TV programmes should remain in place.

### **2 How should those additional safeguards be imposed - by law, or by means of the Ofcom Code?**

We believe that the Ofcom code does not sufficiently protect children from alcohol advertising and will need considerable strengthening if it to be used to regulate product placement.

### **Programme genres**

### **7. If product placement is allowed in programmes made by or for UK television, should any of the programme genres permitted by the AVMS Directive be excluded?**

Alcohol product placement should not be permitted on any of the program genres.

### ***Children***

### **15. Should any or all product placement be restricted or prohibited in programmes with a disproportionately high child audience?**

Under the current Ofcom guidance, alcohol advertisements cannot be shown around programmes which have an indexed child audience of 100 or more – that is, programmes which have a notably higher proportion of children in their audience than one would usually expect to see. The use of this index means

that, while the current restrictions on spot advertising of these products may cover programmes which are relatively more popular with children under 16 compared to adults, the majority of programmes that have the greatest numbers of children viewing are not subject to the regulations as they are also popular with a large number of adults<sup>9</sup>. We therefore believe that the current processes for determining a high child audience and restrictions for spot advertising will not be effective for product placement. The only way to protect children from this type of advertising is to retain the current ban on alcohol product placement.

**18. Should there be restrictions on placing certain types of products in programmes with a disproportionately high child audience?**

There are widely acknowledged arguments for controlling the advertising of alcohol products in programmes viewed by children. It therefore follows that these restrictions should be applied to product placement too.

**19. If so, should those restrictions be the same as or greater than those which are currently in place for the scheduling of spot advertising of those products?**

The current controls that supposedly limit the exposure of children to alcohol advertising are only partly effective because they apply to dedicated children's programming and programmes which have a an indexed child audience of 100 or more. When actual exposure was audited by OFCOM the data showed that despite these regulations, considerable numbers of children were still being exposed to TV advertising,<sup>10</sup> therefore these controls are not protecting children adequately. We strongly recommend that the current restrictions on alcohol advertising are strengthened and that the total ban on alcohol product placement is retained.

***Tobacco, alcohol, HFSS foods, gambling***

**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?**

The AHA notes that the current AVMS Directive requires that alcohol product placement is not directed at children and does not encourage immoderate alcohol consumption. However, we are concerned that neither this stipulation nor the application of current BCAP restrictions to product placement is adequate to prevent alcohol product placement contributing to the increasing alcohol related harm. The evidence shows that children and young people are influenced by volume of exposure to alcohol advertising despite the messages and targeting in them. We strongly recommend that an outright prohibition on product placement for these products is retained.

**25. 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?**

We do not believe that the current AVMS rules are sufficient. Given that the BCAP code is currently under review we cannot to comment on whether they could be applied to product placement at this point in time.

**26. Are there any alternative forms of safeguard that may be appropriate?**

Since the Chief Medical Officer has called for an alcohol free childhood up to age 15, an outright prohibition is the only way to completely safeguard those under age 15.

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<sup>1</sup> Academy of Medical Sciences, 2004, 'Calling Time on the Nation's Drinking', Academy of Medical Sciences

<sup>2</sup> Anderson P, Bruijn de A, Angus K, et al, 2009, 'Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systemic Review of Longitudinal Studies, Alcohol and Alcoholism, 44, 3:229-243.

<sup>3</sup> Ibid.

<sup>4</sup> Meier P, et al, 2008, 'The independent review of the effects of alcohol pricing and promotion. Summary of evidence to accompany report on phase 1: Systematic Reviews' School of Health and Related Research , University of Sheffield.

<sup>5</sup> Yang M, Roskos-Ewoldsen RD, 2007, 'The effectiveness of brand placements in the movies: Levels of placements, explicit and implicit memory, and brand-choice behaviour, Journal of Communication, 57, 469–89.

<sup>6</sup> Auty, S, & Lewis C, 2004, 'Exploring children's choice -The reminder effect of product placement', Psychology & Marketing, 21, 697–713.

<sup>7</sup> Dalton, MA, Sargent JD, Beach ML, et al, 2003, 'Effect of viewing smoking in movies on adolescent smoking initiation: A cohort study, Lancet, 362, 281–285.

<sup>8</sup> Morton, C. & Friedman, M, 2002, "'I Saw It in the movies': Exploring the link between product placement beliefs and reported usage behavior," Journal of Current Issues and Research in Advertising, 24, 33–40.

<sup>9</sup> Green, A et al, 2007, 'Missing the target - Television advertising', Sustain, accessed on 7 January 2010  
[http://www.sustainweb.org/pdf/Missing\\_the\\_target.pdf](http://www.sustainweb.org/pdf/Missing_the_target.pdf)

<sup>10</sup> Ofcom, ASA, Neilson Media, 2006, 'Young People and Alcohol Advertising: An investigation of alcohol advertising following changes to the Advertising Code'. London.