

Institute of Alcohol Studies (IAS) response to consultation on product placement.

This was written mainly as a narrative report, but question numbers have been added to assist in linking our points to the specific consultation questions.

Question 24

The IAS opposes a relaxation of regulations that would allow product placement in UK television programmes. We believe that product placement would exacerbate existing problems with the portrayal of alcohol on television.

The current situation is that alcohol is ubiquitous on television. Hansen (2003) found that in a sample of peak time soaps, drama and news programmes, 85% contained some reference to alcohol, including all of the drama programmes. The vast majority did not form an important part of the storyline or news content but were used in the background as context. Portrayals were predominantly positive, using alcohol as an indicator of celebration or romance.

This positive, background presentation creates the impression of alcohol as a normal, desirable part of everyday life, whilst failing to address its less positive attributes.

Whilst it is possible that the effect of product placement would be simply to replace generic beer, for example, with branded beer, we consider it much more likely that commercial pressures would increase the incidence of alcoholic drinks and drinking (in common with the consumption of other unhealthy products).

Notably lacking in current television content is an acknowledgement of alcohol's negative consequences. Any desire by a programme maker to address this would certainly be undermined by the commercial interest associated with product placement. No advertiser would want their product associated with the harms that may result from alcohol consumption.

Question 25

No, the rules that alcohol advertising must not be aimed specifically at minors and must not encourage immoderate consumption are not adequate safeguards. Specifically on the first of these, adolescents do not typically respond to adverts 'aimed at minors' but to adverts aimed at young adults

Questions 20-22

The purpose of prohibiting unduly prominent placements is unclear. It is unlikely that this is to protect the quality of programmes as this is inconsistent with the suggestion that placements be flagged as they occur and in any case, it is not the role of the regulator to monitor programme quality. Therefore we

conclude that the purpose of this restriction is to restrict the extent of advertising activity, so that it does not come to dominate programmes.

If this is the case, there is an underlying assumption that prominent placements are more effective forms of advertising than subtle placements. This assumption is flawed: In fact, the reverse is true. Unnoticed exposure to products increases liking for those products via the familiarity effect (Wilson, 1979). When an advertisement is recognised as such, the viewer has the opportunity to make a conscious decision about how to respond to it. This is not the case with product placement.

In addition to the increased effectiveness of subtle product placement, there are ethical concerns about advertising that is not noticed. Subliminal presentation of advertising messages is rightly banned, and product placement shares enough characteristics with subliminal advertising that it should similarly be prohibited.

It would be naïve to rule that product placement must not influence editorial decisions and expect hard-pressed programme makers to ignore the possibility of increasing their income by make a few tweaks to the script. It is inevitable that product placement, in virtue of being integrated into the programmes, will influence programme content.

Questions 15-19

Product placement of alcohol must be banned in programmes watched by children.

If product placement is to be restricted or banned only for children (rather than for everyone, which we would favour), we consider the criterion of a 'disproportionately high child audience' to be wholly inadequate. Firstly, at certain times of day one would expect a very high child audience, so no figure could be considered disproportionately high. Secondly, the proportional nature of this definition means that it is influenced by the number of adults watching the programme. Therefore, a popular programme might have a very high number of child viewers but also a very high number of adult viewers, resulting in a reasonably modest proportion of the audience being children. If programmes are to be identified on the basis of the child audience, this should be done in terms of absolute numbers of children watching, not a proportion and not relative to an expected number.

Question 40

If product placement is to be allowed at all then negative placement should also be permitted, but perhaps only for generic products rather than specific brands. Prohibiting it risks a situation in which government sponsored health messages about the dangers of alcohol are not allowed, but alcohol producers are at liberty to promote their products.

References

Hansen, A. (2003) The portrayal of alcohol and alcohol consumption in television news and drama programmes. *Alcohol Concern*.

Wilson, W.R. (1979) Feeling more than we can know: Exposure effects without learning. *Journal of Personality and Social Psychology*. Vol 37(6) pp 811-821.