

The findings and conclusions of the conference ‘Digital Alcohol Marketing in the Spotlight’, Amsterdam 2019

On the 19th September 2019 the European Centre For Monitoring Alcohol Marketing (EUCAM)) organised with the Centre for Health Communication of the University of Amsterdam and the European Alcohol Policy Alliance (Eurocare) a conference about digital alcohol marketing. The first goal of the conference was to present and discuss the most recent scientific information about the impact of alcohol marketing via social media on young people. The second goal was to try to find an answer on the question on how to regulate these relatively new marketing tactics effectively.

Speakers of the conference:

Dr. Hanneke Hendriks, Department of Communication of the VU University of Amsterdam; Dr. Nathan Critchlow, Institute for Social Marketing, University of Stirling, Scotland; Alina Willoh, MSc-student Communication Science of the University of Twente, the Netherlands; Aleksandra Kaczmarek, Policy Manager, European Alcohol Policy Alliance, Brussels; Hanne Cecilie Widnes, Secretary General of IOGT Norway; Dr. Emmi Kauppila, researcher, University of Helsinki, Finland and Dr. Carina Ferreira-Borges, Programme Manager Alcohol and Illicit Drugs of the WHO European Office for Prevention and Control of Noncommunicable Diseases.

Participants. The organizers welcomed 80 participants from 18 different European countries.

What we know about the developments of digital alcohol marketing

The three morning presentations provided a comprehensive overview of alcohol marketing through digital media, ranging from established findings to emergent research on new and innovative forms of alcohol marketing. Across the presentations, seven conclusions were shared:

- (1) Young people are exposed to alcohol marketing through a sophisticated and interactive ‘digital marketing mix’. This includes paid-for media (e.g. banner adverts, promoted posts, or adverts on video sharing platforms), brand owned media (e.g. websites, social media pages or smartphone apps), and convergent marketing which appears ‘under the radar’ (e.g. paid-partnerships with social influencers).
- (2) Alcohol marketing through digital media provides a high-profile opportunity to reach and interact with young people. Such marketing is particularly powerful because it can be accessed and delivered almost anywhere (e.g. through smartphone and tablets), real-time data can be used to target marketing at particular audiences, making it almost impossible to track and report, and because digital media can extend the reach and influence of traditional marketing activities (e.g. sport sponsorship).

- (3) Internet users also engage in alcohol promotion, both by interacting with commercial marketing and by creating and sharing user-created promotion (e.g. Nekominate or posting photos documenting their own drinking experiences). Such content poses unique challenges as it often falls outside of regulated spaces, is not subject to controls or regulations what messages can be promoted (e.g. excessive or high risk consumption), and perceived peer endorsement may enhance the message influence. It is important to consider both commercial and user-created content in tandem, because neither exist in a vacuum. They interact and overlap with each other and young people are exposed to both forms of content simultaneously.
- (4) Digital marketing consistently portrays alcohol in a highly positive and salient fashion giving the impression that its consumption leads to social success (which for traditional media could be against Art 22 c of. the AVMSD, however with the social media it is tolerated). This is particularly true for alcohol marketing using social influencers (e.g. through Instagram) where the products and brands are shown to be part of aspirational, desirable, social, popular and fashionable lifestyles and identities.
- (5) In digital alcohol marketing, effective promotion of lower-risk consumption or the age-restricted nature of alcohol has several considerable limitations. Specifically, such messages are either absent altogether, positioned in a way that minimises visibility and audience attention, or present strategically ambiguous messages around ‘responsibility’.
- (6) Internet users also engage in alcohol promotion, both by interacting with commercial marketing and by creating and sharing user-created promotion (e.g. Nekominate or posting photos documenting their own drinking experiences). Such content poses unique challenges as it often falls outside of regulated spaces, is not subject to controls or regulations what messages can be promoted (e.g. excessive or high risk consumption), and perceived peer endorsement may enhance the message influence. It is important to consider both commercial and user-created content in tandem, because neither exist in a vacuum. They interact and overlap with each other and young people are exposed to both forms of content simultaneously.
- (7) Young people report awareness of, and participation with, a range of digital alcohol marketing. For example, in the past month almost half of 11-19 year olds in the United Kingdom had seen alcohol marketing on social media¹, one in four saw it at least weekly¹, and over one-in-ten had participated with a form of alcohol marketing on social media². These estimates are even higher among younger adults above the legal purchasing age (e.g. 18-25 year olds)³. Because these studies are based on self-report, these findings are likely to be underestimates, given the challenges involved in remembering what marketing has been seen or recognising it as marketing in the first place.
- (8) As per leading evidence on alcohol marketing to date, the studies presented again support that exposure to digital alcohol marketing is associated with alcohol-related attitudes and consumption among young people, including higher-risk consumption. Even though many existing studies on digital media are cross-sectional, that there is any association at all suggests

¹ Critchlow, N., MacKintosh, A.M., Hooper, L., Thomas, C., & Vohra, J. (2019). Awareness of alcohol marketing, ownership of alcohol branded merchandise, and the association with alcohol consumption, higher-risk drinking, and drinking susceptibility in adolescents and young adults: A cross-sectional survey in the UK. *BMJ Open*, 9(3), e025297.

² Critchlow, N., MacKintosh, A.M., Hooper, L., Thomas, C., & Vohra, J. (2019). Participation with alcohol marketing and user-created promotion on social media, and the association with alcohol consumption and brand identification among adolescents in the UK. *Addiction Research and Theory*, 27(6), 515-526.

³ Critchlow, N., Moodie, C., Bauld, L., Bonner, A., & Hastings, G. (2016). Awareness of, and participation with, digital alcohol marketing, and the association with frequency of high episodic drinking among young adults. *Drugs: Education, Prevention and Policy*, 23(4), 328-336.

that marketing must play some role in driving consumption (i.e. either initiating or reinforcing) and that reductions marketing exposure will have some positive effects.

Key principles of effective alcohol marketing regulation:^{4 5 6 7 8}

(1). Volume restrictions are more effective than content restrictions

The research is clear that exposure to alcohol advertising drives harmful consumption effects. Regulations restricting the volume of alcohol advertising (i.e. full or partial bans) are thereby more effective at reducing exposure than regulation seeking to limit the shape, content or form of such advertising. In addition, volume restrictions are easier and cheaper to enforce as they don't require individual content analysis.

(2) Comprehensive media-neutral legislation is more effective than partial or media specific one

- *Comprehensive media-neutral legislation ensures that new forms of marketing will automatically be covered by the legislation. This avoids technical developments, or unforeseen loop-holes leading to certain types of marketing becoming unregulated, such as digital media in many countries today. Comprehensive regulation avoids substitutive effects (i.e. marketing expenditure shifting rather than reducing).*
- *Finland provides an example of content specific social media restrictions. Although there is evidence of declining trend in the use of restricted content, the regulation has not kept alcohol brands from creating engaging social media content and reaching young people.*

(3) The more difficult it is to monitor alcohol marketing on a platform, the stronger the need for encompassing volume restrictions (bans).

If legal compliance is difficult to monitor, which is the case with fast moving individually targeted ads on digital platforms, monitoring, upholding and enforcing content restrictions becomes difficult and expensive for the responsible authority. Bans ensure that platforms remove the possibility for advertisers to send alcohol advertising.

(4) If used, it is more effective for content restrictions to define what is legal than what is illegal.

Defining what legal content to include in alcohol advertising simplifies monitoring/enforcement by avoiding grey-zones, unforeseen content or policy drift in what can and can't be shown. It also makes the rules easier to understand for citizens, who are often relied on to report unlawful marketing.

⁴ De Bruijn, A., van den Wildenberg, E., & van den Broeck, A. (2012). Commercial promotion of drinking in Europe: Key findings of independent monitoring of alcohol marketing in five European countries. Utrecht: STAP

⁵ De Bruijn, A., Johansen, I., & Van den Broeck, A. (2010). Effective Alcohol Marketing Regulations: A proposed framework to evaluate existing alcohol marketing regulations. Dutch Institute for Alcohol Policy (STAP): Utrecht. Part of the Focus on Alcohol Safe Environments (FASE) project co financed by the European Commission

⁶ STAP (2007). Alcohol marketing in Europe: strengthening regulation to protect young people – Conclusions and recommendations of the ELSA-project. Utrecht: National Foundation for Alcohol Prevention.

⁷ Smith, S. W., Atkin, C. K., & Roznowski, J. (2006). Are "drink responsibly" alcohol campaigns strategically ambiguous?. Health communication, 20(1), 1-11.

⁸ Noel, J. K., Babor, T. F., & Robaina, K. (2017). Industry self-regulation of alcohol marketing: a systematic review of content and exposure research. Addiction, 112(S1), 28-50.

(5) Warning messages & health information are more effective when developed independently from commercial vested interests.

Warning messages accompanying advertising carry less strategic ambiguity when defined by governments and independent health experts, as opposed to actors affiliated with the alcohol industry.

(6) Self-regulation is not effective at reducing youth exposure to alcohol advertising.

There is conclusive evidence that industry self-regulation, including voluntary digital age-verification mechanisms, does not reduce youth exposure to alcohol advertising.

In conclusion, the closer a regulatory framework fulfils the above criteria, the better outcomes can be expected in terms of reduced alcohol-related harm. Encompassing, media-neutral, alcohol advertising bans, which have been enacted in Norway and Lithuania, are good examples. The efficiency of less comprehensive policy options can also be estimated based on these criteria: For example, alcohol advertising bans online are more effective than if they just cover social media and Loi Évin-style content restrictions including government mandated health warnings are more effective than self-regulation.