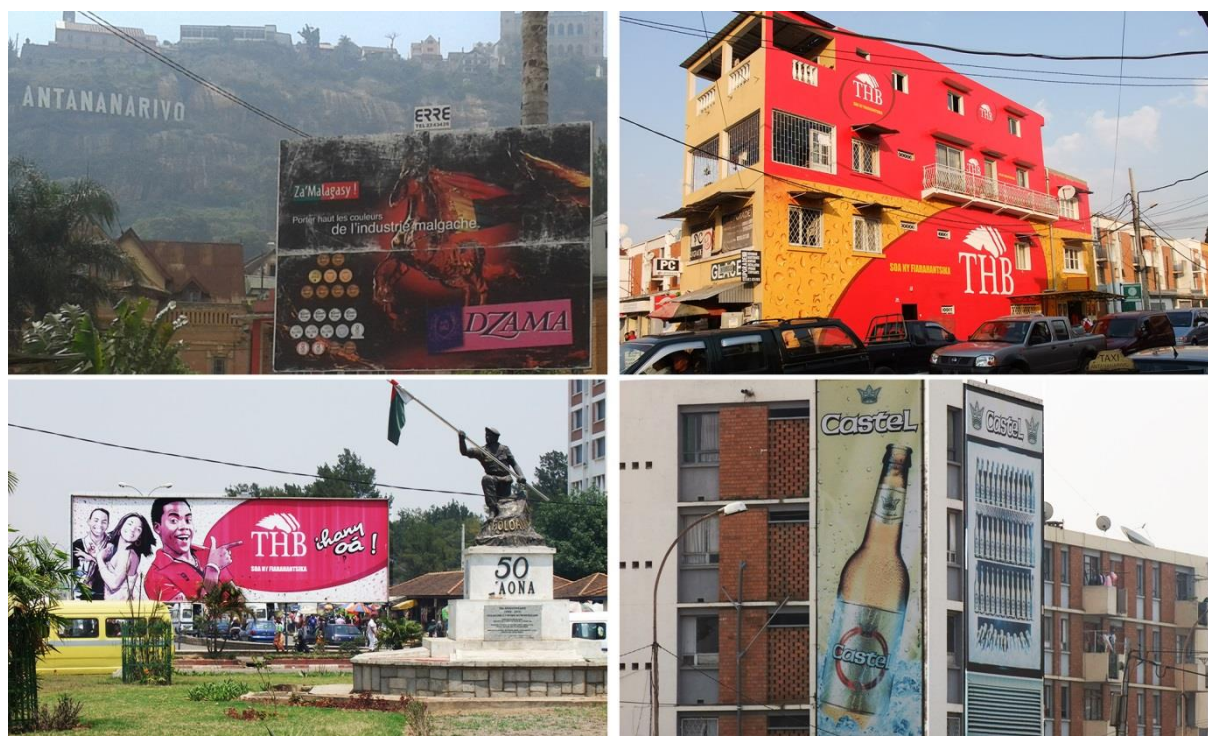


Monitoring Alcohol Marketing in Madagascar



Policy report of October 2013 monitoring exercise in and around Antananarivo



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This research was financed by Blue Cross Norway and supported by Blue Cross Madagascar.



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1. Introduction

To assess the status of alcohol marketing in Madagascar, EUCAM has systematically monitored online, print and outdoor media in October of 2013 in and around the capital of Antananarivo. This paper shows the results of this monitoring exercise. Main findings include:

- Alcohol retailers and bars frequently break the law by placing their establishment within a 150 meter radius of religious buildings, educational institutions, hospitals and etc.
- Alcohol advertisers frequently break the law by using image advertising, instead of using merely product information.
- In outdoor areas on average 48.4 alcohol ads were identified per 0,25 km².
- Alcohol ads are twice as likely to be found around schools, compared to other places.
- Online, claims were identified suggesting that light alcoholic beverages can be consumed by any member of the family.
- Analysis of print media frequently identified unofficial ways of marketing (editorial content, sponsorship of events and sports, as well as job offerings).

1.1 Global alcohol companies shifting to developing countries

Increasingly, alcohol-related problems throughout the African continent are related to the use of home produced alcoholic beverages as well as the use of alcoholic beverages that are produced and distributed commercially [1]. Alcohol is a causal factor for intentional and unintentional injuries and social and physical harm to the drinker and people other than the drinker. This includes reduced job performance, absenteeism, family deprivation, interpersonal violence, suicide, homicide, crime, and fatalities caused by driving while under the influence of alcohol (drink-driving) [2]. Furthermore, alcohol is a contributing factor for risky sexual behaviour, sexually transmitted diseases, and HIV infection as well as lowering adherence to medicine regimes, generally weakening the immune system [2-4]. In general, lower income countries have a disproportionately great disease burden per unit of alcohol consumption compared with high-income populations and countries [5]. Alcohol is the leading risk factor in those developing countries with low rates of child and adult mortality [3].

Because western markets have become saturated, global alcohol producers have shifted their interests to low-income countries and emerging markets with large populations [6]. Consequently, consumption of commercial beverages in Africa is expected to rise in the next years as economic conditions continue to improve in certain countries combined with increasing alcohol marketing and promotion activities by the global alcohol industry [3]. Especially the youth population, who constitutes the largest proportion of the population in African countries (including Madagascar), has increased and is expected to further increase their alcohol consumption.

While the increased sale of alcohol may lead to more jobs, sponsorship deals and easy revenue through taxes for the state, it will also lead to enormous problems for society and health both in private domains (home and work) as well as the public domain. In every country in which alcohol use is a generally accepted phenomenon, many people die every year in traffic due to alcohol use [7].

1.2 Alcohol in Madagascar

The World Health Organization's Global Alcohol Report (2011) does not provide up to date information on alcohol consumption and related health issues concerning Madagascar. The latest WHO data originates from 2006 [8]. Alternately, a recent publication by the Malagasy Institute of Public Health suggests that 59% of teens consumed alcohol during the last 12 months, and 45%

drank during the last 30 days [9]. This research also shows that most young adults (18-25) drink alcohol on a regular basis and that a third of the respondents typically consume six standard units of alcohol on one occasion, which is typically considered as heavy episodic drinking. The three most popular alcoholic beverages in Madagascar are beer, rum and the cheaply available and illegally home brewed Toaka Gasy, according to the Malagasy Public Health Institute [9].

1.3 Effective alcohol policy measures

Many African countries are not well prepared to fight effectively against problems that are created by the availability of alcohol. Easy available alcohol should be opposed by a strong national and local alcohol policy. Effective alcohol policy is a policy that limits alcohol-related health risks effectively and prevents young people from drinking alcohol [10]. In many countries the alcohol industry makes their own rules, this is called self-regulation. However, asking commercial parties to put public health before financial interests has time and again been proven to be problematic and consequently self-regulation is generally less effective than legal or statutory regulations[11]. Margaret Chan, Director General of the WHO has been very clear on this: “The development of alcohol policies is the sole prerogative of national authorities. In WHO’s view, the alcohol industry has no role in formulating policies, which must be protected from distortion by commercial or vested interests [12].”

1.4 Restricting alcohol marketing

Scientific research suggests that exposure to alcohol advertising affects the drinking behaviour of young people [13-17]. Empirical- and review studies support the idea that alcohol marketing lowers the age of initiation of drinking and increases the amount that is consumed and the frequency of drinking [13-17]. In light of this, a crucial policy measure is to restrict or to prohibit alcohol advertising to prevent a one-sided and positive image and to restrict the volume [10].

In the WHO Regional Strategy to Reduce Harmful Use of Alcohol, marketing is part of the priority actions for Member States (source). This point of view is also reflected by the Ministers of Health in the African Region, endorsing a declaration that recommends special attention to a ban and or limitation of the marketing of alcohol, particularly to prevent exposure of youth [18]. Madagascar has a strong base of legislative restrictions on alcohol advertising in the ‘Code Général de Impôts,’ Art . 10/06/37 -39 & Art . 10/06/73 -75 (Art . 10/06/73 -75 prohibits advertisements for fermented and distilled beverages from containing lifestyle information, or qualifications that go beyond mere product descriptions). The current paper looks at how well these laws are upheld and enforced as well as how they can be improved.

2. Methods

In the period of 16 till 20 October 2013 the content was analysed of the official webpages and Facebook pages of the five most popular brands in Madagascar (THB, SKOL, Dzama, Queen's & Castel). Additionally, the placement of outdoor alcohol advertisements (billboards and posters) were systematically monitored in five squares of 500x500 meters (four urban areas in Antananarivo and one suburb). Photos of the advertisements were made with GPS signal enabled smart phones. In addition to geographically mapping alcohol advertisements, alcohol points of sale and schools where also mapped to pinpoint whether the placement of bars and retailers adheres to the 150 meter required distance described in Art . 10/06/37. Additionally, a statistical analysis was performed to see whether there were significantly more alcohol ads found near schools. Lastly, four daily national newspapers (Les Nouvelles, Midi, Matin and L'Express) were monitored for alcohol marketing between 16 and 31 October 2013. It was expected newspapers in this time period would not reflect a representative image of advertising since many advertising spots had been bought by campaigning politicians leading up to the October 25 presidential elections. Therefore, additionally a random sample of 108 newspapers from between May 2010 and October 2013 was also monitored. In addition to this, an incomplete sample (December 2012, February-May 2013, July-September 2013) was monitored of the freely available lifestyle magazine No Comment. For both this magazine and the newspapers the footage was analysed by measuring the number of alcohol advertisements, place of the advertisement and alcohol producer. To get insight into other country specific forms of alcohol marketing and to learn about children's exposure to alcohol marketing, additionally semi-structured interviews were conducted with 20 children between the ages of 12-17 from 3 schools in and around Antananarivo. Informed consent forms were signed by the parents beforehand. An overview of the identified alcohol marketing instances (including photographs of outdoor marketing, scans of newspaper ads) is made available through an online appendix on the EUCAM website (www.EUCAM.info/Madagascar2013).

3.1 Outdoor Marketing

For the monitoring of outdoor marketing in Antananarivo, the partners of Blue Cross Madagascar chose five areas to monitor (four urban and one suburban area) of 500 x 500 m (0,25 km²). In and around these five squares 240 alcohol advertisements were recorded. On average 48.4 ads were recorded per square, with the lowest number of ads (16) found in area 4 and the highest number of ads (62) found in areas 2 (suburb) and 3.

The content of alcohol advertisements is legally regulated in Chapter VI of the 'Code Général de Impôts,' namely in Art . 10/06/73 & Art 10/06/74. Art 10/06/74 effectively prohibits lifestyle marketing or any associations that go beyond product information. The monitoring exercise shows that between 92 (38%) and 157 (65%) of the monitored outdoor ads may be in breach of this law. On the right is an example of an advertisement that's not in breach, along with three other examples which appear to be in breach of Art 10/06/74.

To show whether or not there is a statistically significant better chance of finding alcohol ads in 150

meter zone from schools, we identified zones of 100m² by 100m² in all areas in which outdoor alcohol advertisements and schools have been monitored. All zones in which a primary or secondary school is near are categorized as school zones, all other zones as non-school zones. Differences in placement of alcohol ads in both categories zones are examined.

This analysis shows that of all 103 scanned zones of 100m² by 100m², 43% contain one or more outdoor alcohol advertisements. Zones in which a school is very nearby are more than twice as likely to contain outdoor alcohol advertisements (64%) than zones in which no school is nearby (30%). This can be explained by the placement of alcohol ads near main roads, roads on which also the larger schools are placed. However, a consequence is that young people are exposed to alcohol advertisements on their way to school on an everyday basis. The placement of these ads near (entrances of) schools is in breach with international self-regulation codes of the alcohol industry. When asked how often they see alcohol advertisements the interviewed students stated they see alcohol ads daily on their way to and from school.



Figures 1-4. (From top to bottom.) **1.** Castel, not in breach of 10/06/74, because it only shows the brand name. **2.** A THB billboard, which appears to be in breach because of the slogan “No antsika é!,” which loosely translates as: “We are now.” **3.** A Queen’s billboard describing the beverage with “Ambiancy Tropicaly”, or Tropical Ambiance, which is in breach because this is an association that goes beyond product information. **4.** A mural with Castel’s slogan: “One People, One Drink,” which also goes beyond product information.

Additionally, the students said they see alcohol advertisements in the street on a daily basis. Miora (13): *"I see THB posters on the walls on my way to school. When I see a new advertisement on these posters I'm curious to know what it is..."* Sahaza (12): *"I see THB billboard with Tsiliva and Samoela (famous Malagasy singers) on it on my way to school. At first they drew my eyes, but now I'm used to it."* Nasandratra (13): *"I'm used to the Libertalia and other alcohol advertisement and don't notice them anymore because I see them every day on the stores."*

A second analysis was performed measuring the proximity of Alcohol points of sale to schools. Art . 10/06/37 of the 'Code Général de Impots,' says that bars and alcohol retailers cannot be placed within a 150 meter proximity of schools. Because the functioning of the GPS signal of the used equipment proved to be unreliable during the monitoring in areas 1 and 4, this analysis was only performed in areas 2 (suburban), 3 and 5. As the maps on the following page (also available on www.EUCAM.info/Madagascar2013) show, we found 17 points of sale that are placed within a 150 meter radius of one or more schools.

In reality, the number of breaches of this rule must be higher, because this law does not merely focus on educational facilities but also on "buildings dedicated to religion whatsoever , cemeteries, hospice , hospitals, medical stations , sanatoria and prevention clinics, public bodies created for the physical development of the youth and the protection of public health, prisons, barracks, arsenals and all buildings occupied by the armies of land, sea and air, police and the staff of public services."

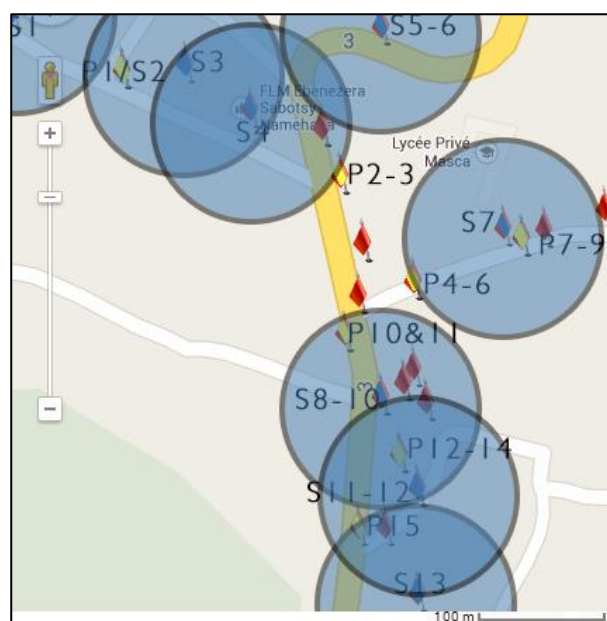


Figure 5. Map of Area 2 (suburb), showing P1 in zone of S2&3; P9-11 in zone of S7; P 14-16 in zone of S8-10; P 12&13 in zone of S8-10; P14-16 in zone of S11&12; P17 in zone of S11-12; and P17 in zone of S13.

It should be noted that there is an exception to the rule: "In exceptional cases, it may be waived with the provisions of Article 10-06-37 above for reasons of order (mainly tourism)." However, in many of the above mentioned cases the establishments do not seem to be focussed on tourists, but on Malagasy.

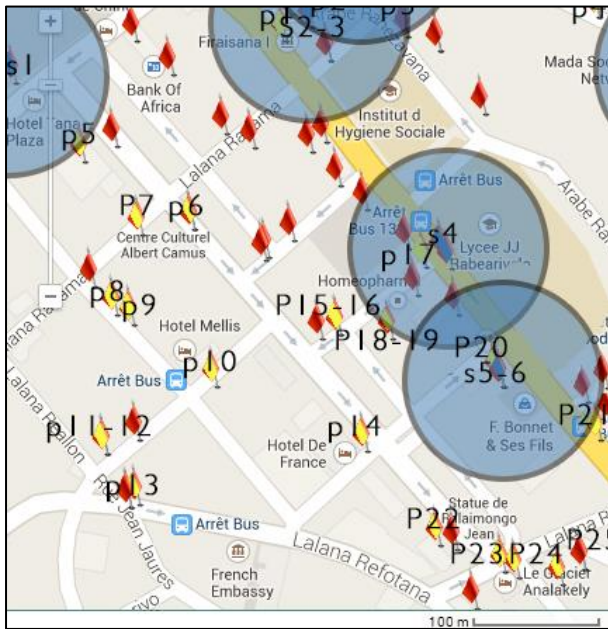


Figure 6. Map of Area 3, showing P1&2 in zone of S2-3; P17 in zone of S4; and P20 in zone of S5&6.

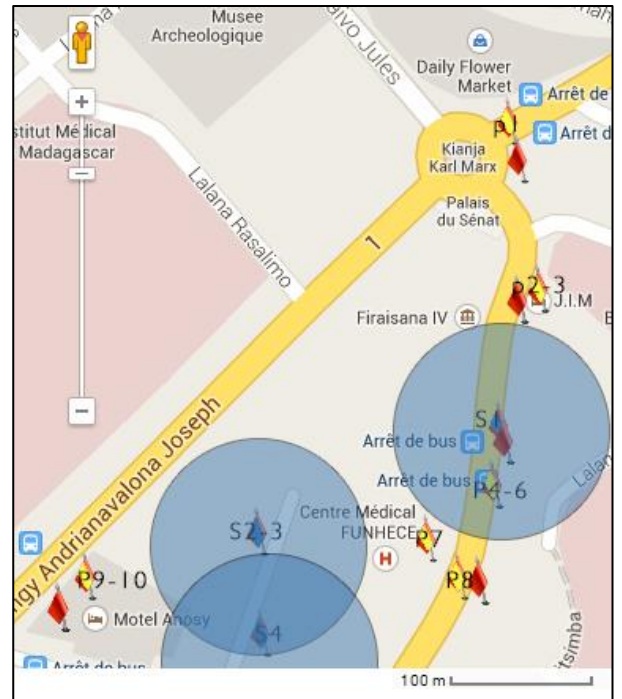


Figure 7. Map of Area 5, showing P4-6 in zone of S1.

3.2 Online Marketing

For an overview of online alcohol marketing five of the most popular alcohol brands (THB, Dzama, SKOL, Queen's and Castel) in Madagascar were looked up on the internet as well as on Facebook. All the brands, except for Queen's were found to have an official webpage on the internet. All these official websites asked visitors to state that they are of legal drinking

age, before entering the website. The argument that such age verification pages should ideally be plain and without attractive elements is strengthened by the age

verification page of SKOL international. When this page opens up, upbeat music from a SKOL commercial immediately starts playing. It is easy to see how minors would be attracted to this music and partly because of this give false information about their age.

The content of the websites is largely dedicated to product information about the various products available from the brands, as well as company history, Cocktail recipes (Dzama), online videos of commercials and music clips about the brand as well as announcements and recaps of sponsored events and (announcements of) prize winning games (SKOL's beer cap game is an example of a frequently found sweepstake where among other prizes people could also win free alcohol). Also noteworthy are the maps on the SKOL and Dzama websites which show points of sale.

In the product overview of the THB website (www.star-thb.mg) a troublesome description was found about the THB product Fresh, a Shandy containing less than 1% alcohol content. The page states:

"...THB Fresh incarne parfaitement la valeur familiale de la culture malgache. Elle peut être consommée par tous les membres de la famille, et s'invite souvent dans les moments de convivialité." ('Fresh embodies the family values of Malagasy culture. It can be consumed by all family members and is often associated with pleasurable times.')

Not only does this description breach Art 10/06/74 on lifestyle advertising, it also suggests that this product is suitable for minors. Furthermore, the THB site also hosts an interactive forum, where moderators ask the users to interact and provide instructions for drinking games which can lead to immoderate drinking.

The online marketing monitoring also looked at social media in the form of Facebook, for THB, SKOL and Dzama official Facebook pages were found, those of SKOL (SKOL-Madagascar) and THB (THB 974) were not visible to underage Facebook user accounts. However, the DZAMA page is visible to people below the legal drinking age, as well as international SKOL sites (e.g. Planeta SKOL, SKOL Folia PE). For the Castel brand a number of Facebook pages were found, but it was unclear whether or not these pages were official pages or fan pages (all of them were visible to the underage Facebook account).



Figure 8. Age verification page of SKOL.com, lures people into the website by playing upbeat music.

3.3 Print

The four biggest newspapers of Madagascar were analysed between October 16th and October 31st, to get an idea of the placement of alcohol ads. During this period 50 papers were analysed, 13 instances of alcohol marketing were found in 12 newspapers. Of these 13 instances, 10 cases (77%) used image advertisements instead of the legally required product information.

This means that 24% of the monitored newspapers contained at least one instance of alcohol marketing. To verify whether this number was lower than regular (due to the campaign advertisements for the presidential elections of October 25th) a second analysis was initiated on a random sample of 107 newspapers. Table 1 provides an overview of the monitored newspapers.

Table 1. Overview of Newspapers in second analysis

Name of Newspaper	Number of issues analysed	Time Period	Instances of Alcohol Marketing Found
Midi	75	05/25/10 – 10/11/13	49
L'Express	14	06/12/13 – 10/11/13	19
Taratra	4	08/23/13 - 10/11/13	2
La Gazette	3	09/04/13 - 31/08/13	0
Ta Tanindrazana	2	10/11/13 & 10/15/13	0
Les Nouvelles	1	10/11/13	0
La Verité	1	10/11/13	0
La Nation	1	10/11/13	0
VaoVao	1	10/11/13	0
Gazetiko	1	10/11/13	0
Ny Vaovaotsyka	1	10/11/13	0
Mlaza	1	10/11/13	0
AO Raha	1	08/29/13	0
DIVA	1	05/07/13	0
Jejoo	1	10/11/13	0

This second analysis shows that 65% of the random sample contained at least one instance of alcohol marketing. The secondary analysis identified 70 instances of alcohol marketing. This suggests that a systematic monitoring exercise of newspapers is needed outside of election time to gain a more representative idea of the volume of alcohol marketing in Madagascar Newspapers.

When all the alcohol marketing instances of the systematic October monitoring are added to the monitoring of the random sample, it appears that 70% of the total 84 identified alcohol marketing instances uses image advertising, compared to 30% which provides only product information.

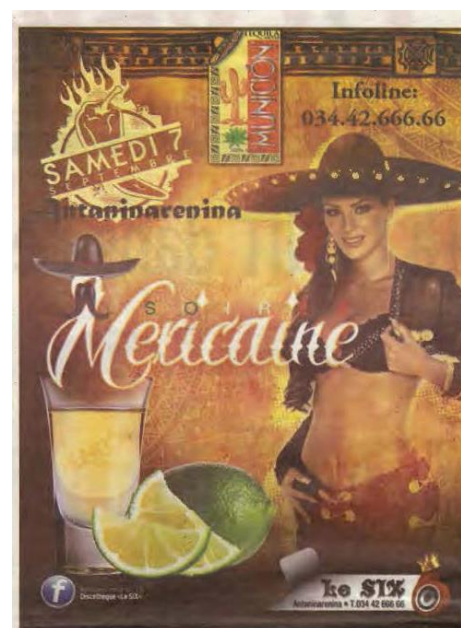


Figure 8. Ad for Municion Tequila, from L'Express (07/09/13)

Table 2. Most identified brands

Brand	Number of identified alcohol marketing instances	Relative amount of total identified alcohol marketing instances
THB	42	50%
Dzama	14	17%
SKOL	8	10%
Gold	7	8%
Casanove Rhum	4	5%

A striking observation is that in addition to traditional advertising and sponsorship messages many job offerings by alcohol companies were identified. In a low income country, it can be argued that these well designed and often colourful job announcements are part of the company's marketing strategy. This does not suggest that these job offerings are not real, but it is possible that repeatedly being exposed to job offerings from a certain brewery can positively affect someone's opinion of the company and its products. Overall, 15 job offerings were identified in 157 newspapers, these were mainly for Dzama/Compagnie le Vidzar and THB/Star Breweries.

Another interesting observation was that alcohol marketing and/or alcohol brand references (either visually or textually) are frequently contained in editorial content. Twenty editorial brand references were identified (24% of all identified alcohol marketing instances).

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BRASSERIES STAR MADAGASCAR
FairLife THB Coca-Cola

COMMERCIAUX

MISSION
Négocier la vente des produits des Brasseries Star Madagascar auprès des points de ventes ensuite, aider ces derniers à la revente de leurs produits (merchandising, animation, présentation nouvelles offres, etc.)

PROFIL

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- ★ Une première expérience en tant que commercial terrain
- ★ Titulaire d'un permis A et/ou B
- ★ Très bon niveau de français
- ★ Bon niveau en informatique
- ★ Grande disponibilité et disponible pour une affectation en province

ACCROCHEZ UNE ETOILE A VOTRE CV

LES DOSSIERS DE CANDIDATURE (lettre de motivation, CV et photo récente) SONT A ENVOYER à la BP 3806 - 101 Antananarivo ou à envoyer directement à l'adresse recrutement@star.mg au plus tard le 13 AOUT 2011. Offres également consultables sur notre page Facebook « Carrières STAR »

Figure 9. Example of a STAR job offering, found in Midi 08/13/2013. Notice that of all the items on this page, the job offering is the only one printed in colour.

A comparable analysis was undertaken studying the placement of alcohol marketing instances in the freely available lifestyle magazine No Comment. Table 3 provides an overview of the issues analysed, and the number of alcohol marketing instances identified in each magazine.

Table 3. Overview of identified alcohol marketing instances in 8 issues of No Comment magazine

Publication Month / Issue #	Alcohol Marketing Instances
December 2012 / 35	24
February 2013 / 37	6
March 2013 / 38	9
April 2013 / 39	11
May 2013 / 40	9
July 2013 / 42	7
August 2013 / 43	8
September 2013 / 44	10

In all 8 issues 84 instances of alcohol marketing were identified. Of these 73% appears to be in breach of the ban on image advertising and 70% is presented as editorial content. These findings are alarming considering that this magazine is freely available in many stores and hospitality establishments and is clearly oriented at young people.

3.5 Other forms of Marketing

Sport and event sponsoring are common practice in Madagascar. Rum producer Dzama has its own racing league (Rallye Dzama), while THB has its own football league (Madagascar THB Champions League). Furthermore, many cultural events (especially music festivals/concerts) are sponsored by brands such as THB and Dzama.

An event noteworthy of its own is the Oktoberfest. Inspired by its German namesake, Star Breweries for the last eight years has appropriated the name Oktoberfest for a number of events, festivities and promotions during the month of October. While in earlier years the festivities remained largely focussed during a three day stadium event with concerts, games and festivities, in 2013 the Oktoberfest blanketed the country through many smaller events in various places during the whole month. During the monitoring exercise two instances of Oktoberfest promotions were witnessed. One Shoprite

supermarket in the centre of Antananarivo held a special price promotion in honour of the Oktoberfest, which was presented in-store by hostess girls (in the same store there was also a Dzama representative endorsing her product). In a suburban Score Jumbo supermarket an even bigger promotion was encountered as entrance, exit as well as most of the store front and parking lot was taken over by THB for the occasion of the Oktoberfest. This event included hostess girls, free to enter price-winning games, THB paraphernalia being available and acrobats and clowns performing on the parking lot. While on first glance it may seem that the Oktoberfest in Madagascar are innocent, fun festivities, the reality is that this is a corporately invented brand promotion that has become synonymous with the THB brand.

Lastly, a marketing technique which was not witnessed during the monitoring, but described by the interviewed children is that of trucks with brand logo's painted on the side, playing loud music and giving away items or playing games. Thirteen year old Eljio said: "They organize animations with a van and loud music. They bring up a lot of alcohol. They



Figure 1-4, from top to bottom. 1. Example of a billboard in the centre of Antananarivo, announcing a music festival sponsored by both THB and Dzama (in the yellow circles). 2. THB hostess girls inside the supermarket. 3. Clowns and acrobats on supermarket parking lot. 4. A THB prize-winning game at the supermarket store front.

organize games where everybody can play. People can win bottles of beer, branded T-shirts or caps. I won a carbonated fruit juice once when I played with a THB animation.” This kind of marketing is also particularly attractive to young people, who are lured to the truck by the upbeat music and then see a dancing, gaming and drinking crowd of people.

4. Conclusions and Recommendations

When considering the greater the exposure to alcohol marketing, the greater the impact on drinking behaviour of young people [19]; a great worry arises when looking at the situation in Madagascar. Already in this first attempt to monitor alcohol marketing systematically in a short period of time, the dominating and unethical character of alcohol marketing, the large volumes of alcohol marketing in multiple media, in combination with other types of alcohol marketing (event sponsoring, in-store promotions, etc.), creates an urgent need for the strong enforcement of effective alcohol marketing regulations.

Self-regulation has been proved insufficient in Western countries as: Australia [20, 21], the Netherlands [22]; the United Kingdom [23, 24]; and the United States [25], as well as developing countries as Nigeria, Uganda, Ghana and the Gambia [26]. Public health experts increasingly advocate a comprehensive ban on alcohol marketing [19]. Nevertheless, too often governments that establish a national alcohol policy keep relying on self-regulation, which is strongly pressured by the alcohol industry stakeholders [27, 28]. The government of Madagascar can be applauded for having at least a legislative base restricting alcohol marketing in the 'Code Général de Impôts,' Art . 10/06/37 -39 & Art . 10/06/73 -75. However, this monitoring exercise suggests that alcohol producers and advertisers are breaking this law en masse.

The most important infringements of the law we have encountered during the monitoring are that often times alcohol retailers and bars were situated within a 150 meter radius of religious buildings, educational institutions, hospitals and etc., (Art . 10/06/37 -39). The other major category of breaking the law encountered during the monitoring is that many advertisements for fermented and distilled beverages contained lifestyle information, or qualifications that go beyond mere product descriptions as is proscribed in Art 10/06/73 and Art 10/06/74. Such infringements were found in multiple media (outdoor, online and print).

In all analysed media a large number of alcohol advertisements were found. In the areas of Antananarivo that were systematically monitored for outdoor alcohol advertising it was found that on average every quarter of a square kilometre ($0,25 \text{ km}^2$) contains 48.4 alcohol ads. Troubling were also claims that were identified online suggesting that light alcoholic beverages can be consumed by any member of the family. Additionally the analysis of print media shows various unofficial ways of marketing such as through editorial content, sponsorship of events and sports, as well as job offerings.

Furthermore companies which are subsidiaries of multinational companies (STAR Brewery and Castel, part of SABMiller), present themselves as unmistakably Madagascan (The biggest beer brand THP for example is licensed by a Dutch company called United Dutch Breweries). This presentation is apparently very successful, because the idea among many people is that THB is a Madagascan beer and for that reason alone, it would be preferable compared to other beers.

By monitoring a short period of time in Madagascar, an impression of existing alcohol marketing practices and strategies of the alcohol industry is obtained. However, in order to get a full picture of alcohol marketing activities, more intensive monitoring is necessary over a longer period of time. Because the monitoring period of this research coincided with the October 2013 election campaigns, significantly less alcohol advertisements were printed in newspapers. This was also the case for the number of alcohol commercials broadcasted on national television, because of which the current

research has not analysed alcohol marketing on TV. More monitoring is advised in a future period where ad placement in print and broadcast media has normalized and is reflective of a representative amount of overall ad placement. Extended monitoring of outdoor alcohol advertisements is also advised in all 22 regions of Madagascar to assess the situation throughout the whole republic.

Meanwhile, the following recommendations to the Madagascar government can be given:

1. Recognizing that a comprehensive ban on advertising, promotion and sponsorship would reduce alcohol-related harm, and that self-regulation is an ineffective mechanism to reduce alcohol-related harm, effective legislation remains necessary to strictly regulate alcohol marketing activities;
2. The total volume of alcohol marketing should be restricted as much as possible. Alcohol marketing tools that are difficult to monitor (e.g. alcohol advertising on the internet) should be prohibited;
3. This preliminary monitoring of alcohol marketing showed that many alcohol advertisements refer to values that are highly appreciated by large groups of Malagasy. Suggestions to sexual and economic success and a glorious, western lifestyle are often used in alcohol advertisements and are absolutely unethical. Just as Art 10/06/73 and Art 10/06/74 of the 'Code Général de Impôts,' state, alcohol advertisements should be restricted to information of the product only; which includes that the product is not to be exhibited in a setting with people or any other context glamorizing the alcoholic product;
4. The use of direct or indirect incentives that encourage the purchase of alcohol should be prohibited;
5. The practice of articles 10/06/73 and 10/06/74 show that having regulations on paper is not in and of itself sufficient. Effective policy depends strongly on its enforcement. The adherence to alcohol marketing regulations should be monitored regularly by the government or a board independent from economic interests of the sale of alcohol. The monitoring method described in this paper can be a starting point of monitoring systematically by non-economic operators;
6. In order to provide governments with adequate information, alcohol companies should be obliged to disclose alcohol marketing expenditures to appropriate governments.

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