

# What does the alcohol industry mean by ‘Responsible drinking’? A comparative analysis

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## ABSTRACT

**Background** The alcohol industry uses responsible drinking messaging as a central element of its corporate social responsibility (CSR) activities. It has been argued that such messaging is vague, and potentially part of broader CSR activities to protect industry interests at the expense of public health. This study aimed to identify how industry defines responsible drinking, and in what contexts it is used.

**Methods** This was a qualitative documentary analysis of publicly available documents and web pages, including company web pages, press releases, reports and blogs from a representative selection of alcohol producers, and industry social aspect/public relations organizations; these were compared to health NGOs and Public Health England. All materials were coded iteratively using NVivo, and results were analysed using the hermeneutic approach.

**Results** The term ‘responsible drinking’ was used almost exclusively by industry or industry-funded organizations. ‘Responsible drinking’ was not clearly defined with relation to any particular level of alcohol consumption, and government alcohol guidelines were rarely referenced.

**Conclusions** Responsible drinking is a strategically ambiguous, industry-affiliated term that allows for multiple interpretations. Industry sources rarely reference government drinking guidelines in the context of responsible drinking, stressing individual responsibility and risk management. Public health practitioners should be aware of these distinctions, and use clear language regarding lower risk drinking.

**Keywords** alcohol, alcohol consumption, public health

## Introduction

Alcohol use ranks as the third greatest risk factor for disease burden worldwide, after hypertension and tobacco use.<sup>1</sup> It is estimated to cause 2.5 million deaths per year (as of 2010), including 320 000 deaths in young adults (15–29 years old).<sup>2</sup> Although there is an extensive evidence base on the most effective interventions to reduce alcohol harms at a population level, which shows that targeting marketing, availability and pricing of alcohol are the most effective options,<sup>3</sup> the main focus of alcohol industry initiatives has been on providing information and education, in spite of their limited effectiveness.<sup>4</sup> By far the most visible and commonly used of such messages are ‘Drink responsibly’ statements and initiatives, a primary focus of alcohol industry corporate social responsibility (CSR) activities globally.<sup>5–7</sup> In the UK, these appear on about three-quarters of product labels<sup>8</sup> and in adverts, often in the form ‘Please Drink Responsibly’ or sometimes ‘Please Drink [product name] responsibly’.<sup>9</sup>

These are placed on product labels in the UK as part of a voluntary agreement with the industry.

While the meaning of ‘responsible drinking’ in the context of these messages is unclear, as the term is typically not defined,<sup>10</sup> current research suggests such messages may have the effect of promoting products rather than provide public health information.<sup>11,12</sup> For example, a study of a responsible drinking advertising campaign by DrinkWise, an Australian industry-funded social aspects/public relations organization (SAPRO), found that the messaging was perceived by young drinkers to be supporting of existing social norms regarding heavy episodic drinking.<sup>13</sup> Industry responsibility messages particularly appear to frame responsibility around the individual drinker, rather than alcohol consumption itself, often focusing on a minority of ‘harmful drinkers’, as opposed to

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the majority of ‘moderate’ or ‘social’ drinkers,<sup>14</sup> while presenting responsible drinking as a behavioural issue, rather than a health or consumption level issue.<sup>15</sup> In this context, where such messages are presented alongside official guidelines (for example in product labels), they may conflict with official guidance (e.g. in the case of UK, the Chief Medical Officers’ guidelines as in Fig. 1).

It has been argued that due to a lack of research, every opportunity should be taken to analyse industry CSR strategies.<sup>16</sup> This is particularly important in the case of responsible drinking messages, due to their global reach, and because such initiatives are used by industry and SAPROs to emphasize its role as a worldwide partner in reducing the harmful use of alcohol.<sup>7</sup>

This comparative study therefore analysed how ‘responsible drinking’ is defined and used by the alcohol industry and affiliated social corporate responsibility bodies in the UK, compared to independent public health bodies.

## Methods

A web-based document search was carried out to identify publicly available documents (annual reports, shareholder communications, press releases and website content) from a range of industry sources. These were two representative multinational alcohol producers (Diageo and AB InBev), Diageo’s DrinkIQ website, the Portman Group (a trade group composed of alcoholic beverage producers and brewers in the UK, that sets advertising and labeling standards), the International Alliance for Responsible Drinking or IARD (industry-funded NGO committed to addressing global public health issues of harmful drinking and promoting responsible drinking), the International Centre for Alcohol Policy or ICAP (the predecessor of IARD) and the DrinkAware Trust (UK-wide alcohol education charity, funded by alcohol producers, retailers and supermarkets). All content published or available in the period between January 2014 and July 2016 from the websites of the above industry-affiliated sources that included variations of the term ‘responsible drinking’ (as assessed by the lead investigator utilizing the NVivo query function) was included in the analysis. As ICAP has now been replaced by IARD, and the ICAP website is no longer live, ICAP web content from 2014 was retrieved using an Internet archive service (<https://archive.org/web/>).

These were compared to a sample of press releases, reports, education materials and website information from Public Health England (PHE), the World Health Organization (WHO), Alcohol Concern (an alcohol charity with no industry affiliation) and Addaction (a specialist drug,

alcohol and mental health treatment charity). For a full list of sources and funding relationships to the alcohol industry, see Table 1.

Coding was performed using NVivo 11 (version 11.2.2), and analysed using the hermeneutic approach. This approach is based on established documentary analysis methodologies used to evaluate how industry might indirectly affect public discourse and policy, most extensively in tobacco industry documents.<sup>17–19</sup> The stages of the hermeneutic approach are reading and understanding meanings of individual texts, identifying sub-themes or ‘codes’, identifying thematic clusters of codes, triangulation between sources, checking reliability/validity (through identifying multiple similar trends), and finally, illustrative use of representative case material (such as quotes from source materials).

## Results

In total, 321 documents were evaluated, of which 101 referred to responsible drinking and were therefore included in the analysis. Individual web pages were the most commonly analysed document (52% of all documents).

### Defining ‘responsible drinking’

The term ‘responsible drinking’ was used almost exclusively by industry bodies (AB InBev, Diageo and DrinkIQ), or industry-funded bodies (Portman Group, IARD and ICAP). The term did not appear to be used in any of the documents sourced from PHE or Alcohol Concern, and was used once by the WHO, in an African case study in which the ‘individual responsibility’ approach was forgone in favour of a public health approach to alcohol.<sup>20</sup> It was used once in an Addaction annual report, in the context of ‘...a partnership between Addaction and Heineken UK piloting new ways to encourage responsible alcohol consumption and reduce the harm caused by alcohol misuse’.<sup>21</sup>

IARD defines responsible drinking as ‘...the enjoyment of alcohol drinks by adults who choose to drink in a manner that does not harm others and minimizes risk of harm to the consumer’.<sup>7</sup> Beyond this sentence, responsible drinking was not explicitly defined in any of the documents studied. However, ‘irresponsible consumption’ occasionally was defined, in the context of unspecified ‘excessive consumption’, binge-drinking, drink-driving, underage drinking and negative consequences for the individual and those around them (see Table 2). AB InBev also uses the term ‘smart drinking’, although the level of drinking in this definition varied (‘Smart drinking varies by individual, depending on gender, size, etc., and can vary for individuals from day to day’)<sup>22</sup> (Table 2).

**Table 1** Document search source

| Entity                                          | Description                                                                                                                                                                               | Industry-funded  |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| Anheuser-Busch InBev                            | The largest global alcohol producer globally, with a market capitalization of \$205 billion and annual sales of \$44 billion (as of May 2016). Headquartered in Leuven, Belgium.          | Alcohol industry |
| Diageo                                          | A global alcohol producer with a market capitalization of 69 billion and annual sales of 16 billion (as of May 2016). Headquartered in London, UK.                                        | Alcohol industry |
| DrinkIQ                                         | An alcohol education website funded by Diageo.                                                                                                                                            | Yes              |
| DrinkAware                                      | Independent UK-based industry-funded charity with the stated aim of reducing alcohol-related harm through providing information, raising awareness and collaborating with other partners. | Yes              |
| International Centre for Alcohol Policy         | Industry-funded not-for-profit think-tank, replaced with IARD in 2014.                                                                                                                    | Yes              |
| International Alliance for Responsible Drinking | Industry-funded not-for-profit think tank committed to addressing global public health issues of harmful drinking and promoting responsible drinking.                                     | Yes              |
| Portman Group                                   | UK-based, industry-funded group which provides standards on labeling, marketing and social responsibility.                                                                                | Yes              |
| Addaction                                       | One of the largest specialist drug, alcohol and mental health treatment charities in the UK.                                                                                              | Partly           |
| Alcohol Concern                                 | Independent charity committed to reducing harm from alcohol-related problems through providing information, conducting research, training professionals and national campaigns.           | No               |
| WHO                                             | Public health arm of the United Nations. Adopted a global strategy to reduce harmful use of alcohol in 2010 <sup>2</sup>                                                                  | No               |
| PHE                                             | Executive agency, sponsored by the Department of Health, established to protect and improve the Nations health and well-being, and reduce health inequalities                             | No               |

IARD, International Alliance for Responsible Drinking.

**Table 2** Examples of defining responsible drinking

| Source   | Quote                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AB InBev | 'Smart drinking includes the notion of responsibility to and respect for the health, wellbeing and safety of yourself and others—not just in the moment, but in the future. Smart drinking varies by individual, depending on gender, size, etc., and can vary for individuals from day to day, depending on how much sleep they've had, whether they've eaten, if they've taken any medication and other factors. In general, government recommendations on moderate consumption, which vary from country to country, are helpful guidelines for smart drinking. The majority of people who drink, practice smart and responsible behavior. If you have questions about what a smart and responsible level of drinking is for you, talk with your doctor or health professional.' <sup>22</sup> |
| Diageo   | '...(responsibility) programmes run or funded by Diageo...aim to prevent excessive drinking, tackle drink driving, address underage drinking, help retailers ensure responsible sales or otherwise promote a positive role for alcohol in society.' <sup>23</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| IARD     | 'When we say "responsible" drinking, we refer to the enjoyment of alcohol drinks by adults who choose to drink in a manner that does not harm others and minimizes risk of harm to the consumer.' <sup>7</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| ICAP     | 'Irresponsible consumption refers to high levels of intake, either on single occasions or repeatedly, or to drinking in inappropriate circumstances or by those who should not be drinking at all.' <sup>24</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

IARD, International Alliance for Responsible Drinking; ICAP, International Center for Alcohol Policies.

### 'Responsible drinking' versus 'moderate drinking'

A clear distinction in meaning and context is apparent between 'responsible drinking' and 'moderate drinking' in industry documents, and in those of industry-affiliated organizations. Compared to 'responsible' drinking, which was generally linked with behaviours (such as avoiding drink-driving, binge-drinking or sexual assaults), 'moderate'

drinking (or drinking in moderation) appeared to be used in the context of individual alcohol consumption levels, and, specifically in reference to levels stated to be compatible with a healthy lifestyle by multiple industry-affiliated organizations (Portman Group: 'The consumption of alcohol in moderation [as defined by the government's guidelines in the UK] is compatible with a healthy lifestyle.', see Table 3).

**Table 3** Examples of 'moderate drinking' uses in context

| Source        | Quote                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AB InBev      | 'We brew our drinks to be enjoyed responsibly and in moderation.' <sup>25</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Diageo        | 'Our brands are made with pride, and made to be enjoyed—responsibly. Consumed moderately and responsibly by adults who choose to drink, alcohol can be part of a balanced lifestyle....' <sup>26</sup>                                                                                                                                                                                                                                                                                                                                                                            |
| DrinkIQ       | 'As described in the UK Sensible Drinking Guidelines, moderate drinking is defined as:<br>Female: 2–3 units a day<br>Male: 3–4 units a day<br>Because people process alcohol differently, these are only guidelines so it is important to be aware of your own limits.' <sup>27</sup><br>'We know that for those adults who choose to drink, the moderate consumption of alcohol can be part of a balanced lifestyle. And we are proud of the approach we have taken, over decades, to promote moderation and to help tackle irresponsible and under-age drinking.' <sup>28</sup> |
| IARD          | 'Moderate drinking...describes regular lower volume consumption. In some studies, moderate drinking may also include very low volume drinking, and findings from these studies included in this briefing will use the term light-to-moderate drinking. Moderate drinking is generally consistent with the range of consumption levels recommended for those who choose to drink in drinking guidelines issued by governments around the world.' <sup>29</sup>                                                                                                                     |
| ICAP          | 'The vast majority of people who consume beverage alcohol do so responsibly and to enhance the quality of their lives. When consumed moderately and in a responsible manner by individuals with good health and dietary habits, who have no medical reason to abstain from drinking, beverage alcohol is associated with few risks of harm and has been reported to have some beneficial effects on health.' <sup>24</sup>                                                                                                                                                        |
| Portman Group | 'The consumption of alcohol in moderation (as defined by the government's guidelines in the UK) is compatible with a healthy lifestyle.' <sup>30</sup>                                                                                                                                                                                                                                                                                                                                                                                                                            |

IARD, International Alliance for Responsible Drinking; ICAP, International Center for Alcohol Policies.

### Industry references to government low-risk guidelines in the context of responsible drinking

Government low-risk guidelines were only mentioned by industry sources in the context of responsible drinking in two instances, and both were accompanied by a potentially contradictory message on inter-individual variability. According to AB InBev: 'Smart drinking varies by individual, depending on gender, size, etc., and can vary for individuals from day to day, depending on how much sleep they've had, whether they've eaten, if they've taken any medication and other factors. In general, government recommendations on moderate consumption, which vary from country to country, are helpful guidelines for smart drinking.'<sup>22</sup> Diageo's DrinkIQ website was similarly unclear, and like the previous example, placed an emphasis on variability: 'In moderation, drinking can be part of a balanced lifestyle...in excess, the effects can potentially be harmful—it all depends on how, when, and how much you consume, plus your age and other characteristics. In the short term... The social benefits are immediate—especially when keeping the amount you consume within the recommended limit.'<sup>31</sup>

### Industry achievements linked to responsible drinking

Responsible drinking or responsible drinking programs were often discussed in the context of what were reported to be

positive industry achievements. These included reporting on levels of investment in responsible drinking programmes ('...at least 300 million USD in advertising and programmers to help remind and educate consumers about the importance of responsible drinking...'),<sup>32</sup> the number of people 'reached' ('Our responsible drinking programmes... this year contributed to creating more than 240,000 responsible drinking ambassadors'),<sup>5</sup> the achievement of voluntary targets ('The labeling pledge is a good example of the industry's commitment to...promoting a culture of responsible drinking in the UK via voluntary action.'<sup>33</sup> or the number of programmes supported ('We support close to 300 responsible drinking programmes in more than 50 countries...').<sup>28</sup>

### References to responsible drinking and government drinking guidelines by other organizations

References to official (e.g. government or health department) lower risk drinking guidelines in the context of responsible drinking were not often identified in these documents. DrinkAware, which often cited government lower risk drinking guidelines, particularly in its web content, only once used language related to 'responsible drinking', in the context of guidance for parents being a role model for children, where adults could drink within the government's low-risk alcohol unit guidelines '... to demonstrate your own responsible attitude to drinking'.<sup>34</sup>

## Health outcomes of (ir)responsible drinking

One of the main potential harms of alcohol consumption comes from the increased risk of non-communicable diseases, particularly cardiovascular disease, diabetes, cancers and liver disease.<sup>35</sup> These health harms did not appear to be mentioned in responsible drinking campaigns or language, although 'irresponsible consumption' was linked to unspecified 'short and long' term consequences by ICAP<sup>24</sup> and IARD.<sup>36</sup>

## Discussion

### Main finding of this study

This study found that the term 'responsible drinking' (unlike drinking in 'moderation') appears to be used almost exclusively in alcohol industry-related documents. Moreover 'responsible drinking' does not appear to be clearly defined (e.g. quantitatively) in any of the industry sources examined. This finding is consistent with analyses of responsible drinking advertising campaigns, which have been referred to as 'strategically ambiguous', in order to encourage a wide range of interpretations, while generally increasing positive sentiment towards the alcohol industry.<sup>10</sup>

Responsible drinking was often mentioned in the context of positive industry achievements, particularly in partnership with other groups and organizations, such as local communities, charities, governments and the WHO. Yoon and Lam, based on an analysis of transnational alcohol corporation CSR activities, argue that these CSR initiatives serve as indirect marketing and as a defense against policies or legislation that could harm industry profits,<sup>37</sup> with a broader theme of defensive 'constituency building' also having been observed.<sup>16</sup> In particular, industry-led community-based initiatives, and language around the localization of alcohol-harm in a small minority, could be seen as potentially negating national-level policy implementation, however, further research is required in this area.

'Moderate drinking' appeared to be used in a different context to 'responsible drinking'. While this distinction may appear subtle, it has important implications. The term 'moderate drinking' can be more directly linked to alcohol consumption levels and health, particularly when defined in the context of government guidelines, and is also sometimes used by alcohol researchers to define consumption levels when reporting alcohol-related risks and benefits.<sup>38</sup> The importance of clearly defining such terms in public service campaigns was emphasized in a SAB Miller shareholder agreement resolution from 1992, in which shareholders, concerned about the vague way in which moderate drinking appeared in Miller advertising, requested the company to '...adopt the definition of moderate drinking used by the

federal government...and use this in the companies public service announcements about moderate, responsible drinking'.<sup>39</sup> In spite of these reservations, 24 years later [TalkingAlcohol.com](http://TalkingAlcohol.com), SAB Miller's current responsible drinking website, states that 'There is no single definition of 'moderate drinking'', and that 'One way of thinking about it is to look at some of the general guidelines available and consider how they fit your circumstances'.<sup>40</sup> The use of moderate drinking language in this way allows industry to appear to be consistent with government and health authority language, while avoiding any commitment to specific consumption levels that might be damaging to business.

Responsible drinking was also rarely found to be defined by industry bodies in relation to government low-risk guidelines, but more commonly involved encouraging specific behaviours such as avoiding drink-driving or underage drinking, both of which have been identified as among the most common themes in global alcohol-industry CSR efforts over the last 15 years.<sup>41</sup> These themes are also part of the 'Global Alcohol Producers Commitments on Reducing Harmful Use of Alcohol'.<sup>42</sup> The fact that alcohol industry sources which refer to responsible drinking do not tend to mention government low-risk drinking guidelines is consistent with the interpretation that 'responsible drinking' is promoted by industry as a vague, self-defined alternative to quantitative evidence-based guidelines. This can be seen in following example from DrinkIQ, which mentions the guidelines but at the same time appears to undermine them: 'Because people process alcohol differently, these are only guidelines so it is important to be aware of your own limits'.<sup>27</sup> These findings suggest that further research would be useful to examine how language used regarding the 'individualization of risk' in industry sources might confuse the presentation and/or reception of health information, and allow industry to present its own messaging in ways which in effect undermine official guidance on alcohol harms.

### What is already known on this topic

The alcohol industry has previously been shown to focus on individual responsibility as a way of shifting focus away from alcohol producers and marketers, with a view to reducing the threat of regulation.<sup>16</sup> It has been argued that this focus on individual behaviours (a frequent hallmark of non-communicable disease policy development) has arisen due to assumptions grounded in neoliberal rationality (regarding individuals as empowered consumers,<sup>43</sup> and fails to reflect important drivers of population health, such as socio-economically patterned health inequalities.<sup>44</sup> The 'individualisation of risk' in this way ignores the limited control people

exert over upstream processes such as trade liberalization or the marketing activities of large corporations, particularly in developing countries, in which regulatory capacity may be constrained by trade agreements that favour transnational corporations.<sup>45–47</sup> Such corporations often dominate choices regarding food and drink, and as such are themselves major drivers of global NCD epidemics.<sup>48</sup>

‘Responsible drinking’ messages however, while feeding into a broader emphasis on individual responsibility, do so in deliberately vague and potentially counterproductive ways, usefully summarized as ‘strategically ambiguous’.<sup>10,11</sup> Such industry efforts to partner with governments in education have been denounced as attempts to placate public health bodies without hurting sales;<sup>49</sup> however, few systematic attempts have been made to establish the themes communicated in responsible drinking information provided by the industry, or to compare this to how responsible drinking is used by health bodies or NGOs.

### What this study adds

The current study systematically analysed the contexts in which the concept of ‘responsible drinking’ is used by the industry itself and industry-affiliated organizations, while also comparing industry and non-industry sources. ‘Consistent inconsistencies’ are revealed in how responsible drinking is defined and in what contexts it is used. In particular, the lack of mention of official guidelines suggests that the concept of responsible drinking acts as a competing industry narrative about alcohol harms. This narrative is at odds with existing evidence, and recommendations of bodies such as the WHO, which recognizes a dose-dependent relationship for ‘...most diseases and injuries causally impacted by alcohol’.<sup>20</sup> Further research is required to determine if this competing industry narrative also extends through corporate messages about the causes and extent of alcohol harms.

In light of these and other findings, arrangements with government in which the alcohol industry, or alcohol-industry-funded sources are primarily responsible for communicating alcohol-related information must be considered carefully.<sup>50,51</sup> In particular, where industry is charged with communicating information about population-level alcohol harms (e.g. guidelines), the findings of this study suggest that while industry may appear to support the spirit of such messages, it may simultaneously undermine them with vague language and advice to consumers to set their own limits. It is therefore imperative that the use of terms such as responsible drinking, moderate drinking and other CSR-related phrases (e.g. ‘know your limits’) be systematically monitored and analysed. Policy-makers, researchers and practitioners

should also exercise caution in using these same terms, to avoid promoting industry agendas.

We conclude that public health practitioners should be aware of the derivation and use of concepts such as ‘responsible’ or ‘moderate’ drinking by industry and industry-funded bodies, as these may exist to promote industry agendas and undermine public health agendas. When language regarding moderation is used, this should be done in relation to official health organization and/or government guidelines, rather than using industry definitions. Further research could examine possible inter-country differences in the use of responsible drinking and ‘moderate drinking’ messages, particularly comparing low- and middle-income countries considered ‘growth markets’ by the industry with more mature and stable alcohol markets.

### Limitations

The current analysis did not investigate differences in how specific themes are emphasized by the alcohol industry in terms of order of appearance, text size and location, or the use of imagery, but such analysis would be useful, particularly for organizations that operate through government-industry agreements. The current analysis was also not comprehensive in its inclusion of industry-affiliated responsibility organizations, and there are further examples of global responsibility bodies (e.g. [responsibility.org](http://responsibility.org)), company-specific responsibility initiatives (e.g. Pernod-Ricards ‘Wise Drinking’ programme) or education-focused SAPROs (e.g. DrinkWise Australia), which could be subject to further analysis, however they appear to use messaging and approaches consistent with the findings in this paper. Finally, the nature of the qualitative methodology used here did not allow for quantification of the agreement between industry-funded sources. This could be addressed in future research through quantitative textual analysis, which has been successfully used to investigate the influence of the sugar industry on guidelines.<sup>52</sup>

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### Conflict of interest

NMH and MP declare no competing interests.

## Statements of ethical approval

None required.

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