



AMA

ALCOHOL MARKETING AND YOUNG PEOPLE:

Time for a new
policy agenda





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Young people are starting to drink at an earlier age, and most drink in ways that put their health at risk. Addressing the marketing and promotion of alcohol to young people is a critical element in an overall strategy to address this issue. A growing evidence base that links alcohol marketing to harmful drinking patterns amongst young people, combined with renewed public scrutiny of the inappropriate promotion of alcohol, has created added impetus to tighten restrictions around alcohol marketing. This paper examines the evidence base that links alcohol marketing to harmful drinking patterns amongst young people, considers the problems with current regulations around alcohol advertising, and outlines the AMA's position in relation to alcohol advertising and promotion.

All children and adolescents have the right to grow up in an environment protected from the negative consequences of alcohol consumption and, to the extent possible, from the promotion of alcoholic beverages.

– World Health Organisation, European Charter on Alcohol (1995)

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EXECUTIVE SUMMARY

Young people are starting to drink at an earlier age, and most drink in ways that put their health at risk. Addressing the marketing and promotion of alcohol to young people is critical in an overall strategy to address this issue.

In the contemporary media and communications landscape, young people are exposed to alcohol marketing at an unprecedented level and from multiple sources. Alongside more traditional modes of advertising through television and radio, the introduction of digital technologies has opened up new platforms for marketing and promotion, with alcohol companies aggressively harnessing the marketing potential of online video channels, mobile phones, interactive games, and social networks such as Facebook and Twitter. Marketing efforts are increasingly sophisticated and multidimensional, integrating online and offline promotions with the sponsorship of music and sporting events, the distribution of branded merchandise, and the proliferation of new alcoholic brands and flavours.

The alcohol industry denies their marketing campaigns specifically target children or teens. However, research consistently demonstrates that young people in Australia are regularly exposed to alcohol marketing across a variety of settings and media platforms. In addition to the ubiquity of alcohol references in the social networking sites and online media frequented by young people, studies have shown that young people continue to be exposed to alcohol marketing through television advertising, print media with a high youth readership, and product placement in film, music videos, comics and video games. Alongside these various forms of marketing, there is accumulating evidence that young people in Australia are encountering alcohol messages, associations and products in a multitude of everyday settings and interactions, including alcohol-sponsored music and sporting events, free gift promotions, alcohol-branded merchandise and interactive competitions.

The explosive rise in alcohol marketing has powerful effects on young people. An extensive body of research indicates that alcohol marketing shapes young people's attitudes and behaviours, encouraging them to take up drinking, and to drink more once they do. The findings of research undertaken in both Australia and abroad show that attitudes and assumptions about drinking are not only shaped by the content of advertising, but also by the sheer volume and variety of marketing. Based on the weight of this evidence, several recent international, systematic reviews conclude that alcohol marketing increases the likelihood that adolescents will start to use alcohol, and will drink more if they are already using alcohol.

With convincing evidence supporting the link between alcohol marketing and alcohol consumption by young people, there is an urgent need to tackle the problem of alcohol marketing in Australia with robust policy and stronger regulatory oversight. While children and adolescents are particularly vulnerable to alcohol marketing, young people aged up to their mid-20s are highly susceptible and, as a prime target group for alcohol marketers, are at particular risk of alcohol-related harms. Stronger policy and regulation of alcohol marketing should encompass all these groups of young people.

Existing policy and regulatory responses in Australia have proven inadequate and have failed to keep up with the pace and scope of change in the media and marketing environment. The self-regulatory scheme for alcohol advertising in Australia is funded and administered by the alcohol industry. It is voluntary, limited in scope, unable to enforce penalties, and ultimately fails to protect young people from continuous exposure to alcohol marketing.

As the media marketplace continues its rapid transformation, the growing volume and complexity of alcohol marketing to young people deserves close scrutiny and demands prompt, remedial action by policymakers.

The AMA believes that the exposure of children and young people to alcohol marketing must be curtailed, and recommends the following measures:

1. The regulation of alcohol marketing and promotion, including as it relates to children and young people, should be statutory and independent of the alcohol and advertising industries. Experience in Australia and overseas demonstrates that self-regulation is not the answer.
2. Meaningful sanctions for serious or persistent non-compliance with marketing regulations should be introduced, particularly where those regulations relate to children and young people.
3. The sponsorship of sport by alcohol companies and brands should be phased out, with organisations encouraged and assisted to source socially responsible alternative funding.
4. Sponsorship by alcohol companies and brands should be prohibited at youth, cultural and musical events.
5. Given the cumulative effects of marketing, regulations need to limit the volume or amount of alcohol marketing, as well as its content.
6. The regulation of alcohol marketing should be expanded to incorporate point-of-sale promotions, branded merchandise, and new media and digital marketing, including marketing through social media, viral campaigns, mobile phones, and the use of data collection and behavioural profiling. Regulations should be sufficiently flexible to incorporate new and evolving digital marketing activities.
7. The amount spent annually on marketing by leading alcohol companies should be publicly disclosed, including expenditure on social media, online video, mobile campaigns, events sponsorship and product placement.
8. Continuing research into the extent and impact of online and digital marketing, and the effectiveness of different regulatory approaches to this form of marketing.
9. Options to develop a cross-border, international response to alcohol marketing should be pursued. The Framework Convention of Tobacco Control provides a possible model for global governance to control alcohol marketing. Examples of possible standard-setting mechanisms include World Health Organisation regulations, ISO standards and Codex Alimentarius Standards.
10. Health education addressing alcohol consumption should build the critical media literacy of young people.

Preventing alcohol marketing to young people needs to be incorporated as part of a comprehensive and multi-faceted strategy addressing alcohol-related harms in Australia.

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YOUNG PEOPLE AND ALCOHOL CONSUMPTION

Excessive alcohol consumption among young people is a growing public health problem in Australia. Drinking alcohol is often regarded as an indelible part of Australian culture, and within advertising it is variously celebrated as fun, glamorous, and central to sporting or social success. Yet these depictions of alcohol belie the harms associated with its misuse. Although most Australians who drink do so in moderation, for many young people alcohol is the source of considerable social and health problems.

Alcohol consumption

The age at which Australians are having their first drink is continuing to decrease. Almost 90 per cent of young Australians report trying alcohol by the age of 14 (NHMRC 2009). Not only are young Australians beginning to drink at a younger age, but they are also increasingly consuming alcohol in a risky fashion. Almost one in four young people aged 14 to 19 years consume alcohol at levels associated with short-term harm on a monthly or weekly basis, and over four per cent of those aged 16–24 years report having consumed more than 20 standard drinks on a single occasion (AIHW 2008; VDAPC 2010). Thus, for a large proportion of young people, the consumption of alcohol starts early and escalates quickly to risky drinking.

Alcohol-related harms

Alcohol is a major contributor to preventable illness and death, and is responsible for a range of social, health and economic harms (Chikritzhs et al. 2003; NPHT 2009). These harms tend to be most pronounced amongst young people. On average, around five young Australians aged 15 to 24 years die every week due to alcohol-attributable injury or disease, and a further 200 are hospitalised (Chikritzhs & Pascal 2004). In the short term, alcohol misuse by young people is associated with increased risk of depression, suicide, violence, poor academic performance, risky sexual behaviours, and reckless driving (Miller et al. 2007; Coleman & Cater 2005; Shepard et al. 2006; Bonomo et al. 2001). In the long term, alcohol misuse elevates the risks of developing certain cancers and contributes to a range of chronic health conditions, including cirrhosis of the liver, inflammation of the gut and pancreas, heart and circulatory problems, and alcohol dependence (Parry et al. 2011).

Childhood and adolescence are critical times for brain development, and the brain is more susceptible to alcohol-induced damage during these times, while being less sensitive to cues that moderate alcohol intake (NPHT 2009; Bonomo et al. 2001; Hayes et al. 2004; Wells et al. 2004; Hingson et al. 2003). Prior to the mid-20s, the human brain is still developing. At this early age, alcohol consumption can lead to structural changes in the hippocampus, a part of the brain involved in learning processes. High levels of alcohol consumption can permanently impair brain development (ELSA 2007). The consequences of alcohol misuse among children or young people can therefore be profound in both the short and long term.

In addition to the significant harms individual drinkers may experience, the negative impacts of excess alcohol consumption spill over to families, friends, communities and workplaces (Hallett et al. 2012; Morgan & McAtamney 2009; Chan 2005). The total social costs arising from the harmful consumption of alcohol are estimated to be between \$15 and \$36 billion each year (Laslett et al. 2010; Collins & Lapsley 2008). The majority of these costs are for tangible social impacts such as higher crime rates, poor health, low productivity in the workplace and in the home, and road accidents.

The long-term impacts of early drinking

Numerous studies have indicated that those who commence drinking at an earlier age experience an increased risk of physical, social and mental health problems later in life (NHMRC 2009; NPHT 2009). The rates of harmful drinking are highest among young adults aged 20 to 29 years. However, it is the drinking patterns established in adolescence that are often most decisive in shaping later drinking behaviours, with harmful drinking in adolescence substantially increasing the risk of developing dependent or risky patterns of use in young adulthood and later life. Accordingly, those with heavier consumption in their mid-teens tend to have heavier alcohol consumption and dependence in early adulthood. Those who start drinking early not only risk causing irrevocable damage to their brain, but are also at a heightened risk of developing long-term, chronic health conditions associated with alcohol misuse (NEACA 2001; Spear 2000, 2002).

In sum, the harmful use of alcohol among young people is a significant public health challenge in Australia, with short- and long-term consequences for individuals, their family and friends, and for the wider community. Understanding and addressing the factors driving alcohol misuse is, therefore, a public health priority.



THE SHAPE OF CONTEMPORARY ALCOHOL MARKETING

In the contemporary media and communications landscape, young people in Australia are exposed to an unprecedented level of alcohol advertising and promotion. Alcohol marketing is a global industry, and changes to the media and communications landscape have dramatically transformed the nature and reach of this industry. Today, alcohol companies are promoting their products across a wide spectrum of platforms – from traditional media such as television, radio and print, through to social networks, mobile phones and online games. Marketing efforts are increasingly sophisticated and multidimensional, integrating online and offline marketing with the sponsorship of music and sporting events, the distribution of branded merchandise, and the proliferation of new alcoholic brands and flavours.

Young people are at the centre of this marketing mix. Images, messages and associations relating to alcohol are woven into their online communications, the television they watch, the music they listen to, and the events or venues they attend. Although the alcohol industry may argue it does not deliberately set out to target underage drinkers, the discussion below demonstrates that most young people are exposed to alcohol marketing regularly and through multiple sources and media platforms.

Concerns around the exposure of young people to alcohol marketing are not new. Yet limited attention has been given to the impact of a changing media landscape on such marketing. The traditional emphasis of research and regulations has been more established mediums for marketing, such as television, print or radio. While such mediums remain important avenues for promoting alcohol, technological developments have dramatically expanded the modes of marketing and increased the sophistication and dispersed nature of the marketing being undertaken. In addition to examining traditional media and promotional techniques, one of the goals of this paper is to highlight some of the emerging marketing practices that have received limited scrutiny. These new and interactive forms of marketing may often fly under the radar of policymakers, parents and public health professionals. Yet if we are to adopt effective strategies to address the harmful drinking patterns of many young Australians, it is essential that we understand the dimensions and implications of the new marketing landscape.

Traditional marketing techniques and offline promotions

Broadcast media

Television advertising remains the most overt means of marketing alcohol, and continues to comprise a significant share of the total marketing spend of alcohol beverage companies. Radio advertising and product placement in television programming provide additional avenues for promoting alcoholic beverages.

Within Australia, alcohol advertisements on free-to-air television are subject to certain restrictions through the Commercial Television Industry Code of Practice. Under this Code, the scheduling of alcohol advertising is limited to weekends and public holidays between 8:30 pm and 5:00 am, and on weekdays from 12 noon to 3:00 pm and 8:30 pm to 5:00 am. Exemptions apply to live broadcasts of sporting events, which may feature alcohol adverts if shown on weekends or public holidays, or if an event is broadcast simultaneously across a number of license areas or time zones (Free TV 2010). Subscription television is also exempt from any scheduling restrictions for alcohol advertising.

The scheduling restrictions that apply to television are ostensibly designed to limit young people's exposure to alcohol advertising. In practice, young people in Australia are exposed to substantial levels of alcohol advertisements on television. Such advertising not only reaches a large proportion of children, but also deploys elements that they find appealing (Fielder et al 2009). Winter et al. (2008) and Fielder et al. (2009), for example, suggest that children aged 12 years and under view one in three alcohol adverts that are presented on television. A study commissioned by the Commonwealth Department of Health and Ageing found that 13 to 17 year olds were heavily exposed to alcohol advertising via television, and that this level of exposure (90 per cent) was similar to that found amongst 18 to 29 year olds (van Bueren & Davis 2005). Two recent studies found that alcohol advertising during live sporting broadcasts was not only extensive (Davoren & Sinclair 2012), but also featured elements that young people found appealing (Jones et al. 2010). A high level of recall and recognition of specific alcohol ads – and the brands they promoted – was found among children who viewed sporting broadcasts (Phillipson & Jones 2007).

Press Advertising

The print media is another established avenue for marketing alcohol. This includes publications with broad readership, such as national newspapers, in addition to magazines that specifically target youth audiences. Print media advertising represents a small proportion of the marketing spend for alcohol manufacturers, but is widely utilised by alcohol retailers.

Over the past two decades, alcohol product advertisements have become increasingly prominent in Australia's daily newspapers. Since the late 1980s, there has been a trend toward larger and more colourful alcohol advertisements in major daily newspapers (Wilson et al. 2012). Large-scale alcohol retailers are now the primary source of such advertising, which often spans a full page and typically features colour photographs promoting 'special offers' and discounts for 'bulk' purchases.¹

¹ According to Wilson et al. (2012:22), young people aged between 14 and 24 years account for approximately 99,000 readers of *The Age*, and around 170,000 of the *Herald Sun*. The latter had higher levels of advertising for ready-to-drink alcoholic beverages (pre-mixed spirits or 'alcopops').

Magazines also feature alcohol marketing, including those with a high youth readership (Donovan et al. 2007; King et al. 2009; Sanchez et al. 2000; CAMY 2002). A study of 93 youth-oriented magazines in Australia found that over two-thirds featured alcohol advertising (Donovan et al. 2007), and among Australian teenagers there is a high level of awareness of alcohol advertisements in the magazines they read (Jones & Magee 2011). Within magazines popular among teenage girls in Australia, references to alcohol are often woven into editorial content and feature in photographs of celebrities (Archer & Ouschan 2011).

Box 1. 'Above-the-line' and 'below-the-line' marketing

Traditionally, alcohol has been marketed through a mix of television, radio and print advertisements. These forms of marketing, which are broadcast or published to mass audiences, are sometimes referred to as 'above-the-line' marketing. In recent years, there has been a pronounced shift in marketing expenditure away from these traditional modes of marketing, to 'below-the-line' forms of marketing, such as sponsorship, competitions, special promotions, and the use of online media and mobile phones. These latter forms of marketing are often more targeted toward particular niches and – importantly – they are often less visible to regulators.

While this distinction is useful for distinguishing between different types of marketing, marketing strategies typically involve various above- and below-the-line activities. In this way, different forms of marketing do not operate in isolation, but rather work in concert to reinforce certain messages or associations.

Product placement

One of the distinguishing features of much contemporary alcohol marketing is the way it blurs the line between promotion and content, and between advertising and entertainment. Rather than promoting a beverage through a discrete and identifiable advertisement, such as a television commercial, marketers are increasingly weaving references to a product into the very 'fabric' of media and communications.

Product placement encapsulates this approach to marketing. It involves intentionally embedding a brand name or product *within* a film, television program, music video, comic, videogame, or blog. The appearance of the product is not explicitly identified as a persuasion attempt and is less likely to raise consumer defences (McCarthy 2004; Balasubramanian 1994).

Recent content analyses highlight the extent of alcohol branding in film and on television. A study of over 500 high-grossing films from the United States (US) found that 83 per cent depicted alcohol use (including 57 per cent of G or PG-rated movies), with 52 per cent referencing specific brands (Dal Cin et al. 2008; for additional studies that highlight the prevalence of product placement in film, see Lyons et al. 2011; Hanewinkel et al. 2007; Roberts et al. 1999; Goldstein et al. 1999; Sargent et al. 2006).

Box 2. Examples of alcohol brand imagery in film



Carlsberg Beer in *Spiderman* (2002)



Coors in *E.T.* (1982)



Corona in *The Green Hornet* (2011)



Budweiser in *Terminator 3: Rise of the Machines* (2003)

Within the alcohol industry, one of the most effective exponents of product placement has been the US company Anheuser-Busch. Anheuser-Busch established its own placement firm in 1988, becoming the first company and the first brewery to do so. Analyses of US films have shown that Anheuser-Busch brands are the most frequently featured alcoholic beverages to feature in US films, with the brand Budweiser recording the most number of appearances. In addition to film, Anheuser-Busch have also incorporated their brands into television shows such as *Survivor*, *Mad Men*, *True Blood*, *Entourage*, *Sons of Anarchy*, *Man of Your Dreams* and *Saturday Night Live*. Heineken has also been active in this area in recent years, with paid placements in, and merchandising tie-ins with, *Austin Powers* and *James Bond* movies. Miller, Corona, Jack Daniel's, Johnnie Walker and Smirnoff are among the other most frequently featured brands in US films.

Another established medium for product placement is music. Music has several distinct advantages as a medium for product placement, with audiences tending to listen to songs or watch music videos over and over again, thereby enabling repeated exposure to branded products. For many young people, popular music features in everyday life in numerous settings and through radio, the Internet, new technologies, and music video clips. The extant literature examining the influence of popular music has shown that popular music is particularly influential among adolescents, shaping identity formation, and signalling group identity and integration into youth cultures (AAP 2009; Tarrant et al. 2001). Alcohol brands are frequently woven into such music, with a recent study finding the average US adolescent is exposed to 34 references to alcohol in popular music daily (Primack et al. 2012). This analysis of 793 of the most popular songs in the youth market between 2005 and 2007 found that about 25 per cent of the songs that mention alcohol also mention a brand name. These brands were not only depicted in ways that elicited positive feelings and associations, but they also tended to be those that are most popular among underage drinkers (Primack et al. 2012).

Box 3. Examples of product placement in music: Vodka, music clips, and teenage girls

Among teenage girls, the popularity of spirit-based drinks is mirrored in the music they listen to. Pre-mixed spirits (particularly those with a vodka base) regularly feature in the music videos of popular female singers., regularly feature in the music videos of popular female singers. Lady Gaga has been one of the most conspicuous exponents of product placement, and the video clip accompanying her hit *Bad Romance* illustrates the prevalence of alcohol branding in her music. The video clip, which was one of the most viewed online music videos in 2011 (with over 450 million viewings), includes multiple close up shots of Lex Nemeroff vodka bottles and images of people drinking glasses of clear liquid. In a scene towards the end of the video, Lady Gaga has a clear liquid forced down her throat as she writhes on her back.



Image stills from the music video, *Bad Romance*, Lady Gaga (2011)

Madonna is another high-profile singer who is popular among teenage girls and, as brand ambassador for Smirnoff Vodka, is an enthusiastic promoter of vodka-based beverages. In an extended bar scene in the music video clip for *Give Me All Your Luvin'* (2012), Madonna and other female models are shown dancing around a bar displaying a row of ten illuminated Smirnoff Vodka bottles. The release of this music clip coincides with a wider marketing campaign between Madonna and Smirnoff Vodka, which includes a global Facebook competition dubbed the 'Smirnoff Nightlife Exchange Project Dance Competition'.



Give Me All Your Luvin' Madonna (2012)

Other popular female vocalist who have featured vodka-based brands in their music clips include Lykkilí (Kanon Organic Vodka), Dev (Grey Goose vodka), Jennifer Lopez (Voli Vodka), and Ke\$ha (Revolution Vodka, along with Revolution Tequila).

Product development

The development of new brands and flavours is itself a marketing activity and a key means of attracting new cohorts of drinkers. Over the past decade, there has been a dramatic increase in the number of alcohol products, many of which are packaged and promoted in ways that appeal to young people. This is illustrated by the proliferation of new brands and flavours in three categories of alcoholic beverages: 'ready to drink' beverages (also known as 'alcopops'), alcoholic energy drinks, and alcoholic ciders.

'Ready-to-drink' (RTD) products are pre-mixed drinks that combine an alcoholic beverage with a non-alcoholic drink, such as a soft drink, fruit juice or milk. Since these drinks first emerged onto the market in the mid-1990s, an abundance of flavours have been developed and launched. Young Australians are among the most prolific RTD drinkers in the world, with adolescents aged 12 to 17 years comprising the largest proportion consuming RTDs (ABS 2011a; Smith et al. 2005; Nielson 2008; Copeland et al. 2007). These beverages have also become the drink of choice for high-risk drinkers under the age of 25 (Senate Standing Committee on Community Affairs 2008).

In a market already crowded with multiple flavours and brands, new RTD products are developed and promoted to attract particular niches, using a careful configuration of marketing elements including packaging, promotion, ingredients, distribution, and price. Consumer research with young people illustrates how the marketing mix for these drinks appeals to teenagers and starter drinkers (Hughes et al. 1997; Jones & Reis 2012). The packaging is typically brightly coloured, often resembling soft drinks or other non-alcoholic beverages, and using distinctive brand imagery such as cartoon images, psychedelic lettering, glow-in-the-dark labels, together with rebellious or anti-establishment names. The innovative promotional campaigns associated with such drinks tend to be highly targeted, using online mediums and youth-oriented events rather than traditional marketing channels such as television or radio (EUCAM 2008; Jones & Magee 2011). The packaging and promotional elements of RTD beverages, in addition to the sweet taste and low price, have been central in heightening the popularity of RTDs among teenagers and new drinkers (Jones & Barrie 2011; MacKintosh et al. 1997; Romanus 2000; Gates et al. 2007).

In the past few years, the alcoholic beverage market has been flooded with new brands and flavours of alcoholic energy drinks and alcoholic ciders and, corresponding with this, there has been dramatic sales growth in these two categories of alcoholic drinks. Over 45 new cider brands were introduced between 2009 and 2011, nearly doubling the number of cider brands that can be purchased in Australia (Nielsen Company Australia 2011). Alcoholic energy drinks are a form of RTD that combine high-energy soft drinks (such as Red Bull) with spirits (such as vodka). These drinks have been aggressively marketed at the youth market and have proven to be especially popular among young Australians aged 12 to 17 years (Jones & Barrie 2009; Pennay 2011; Gunja & Brown 2012).



Box 4. Case study of product development: Vodka Cruiser 'Pick Your Party, Make Your Mix'



According to its official website, Vodka Cruiser is a “bright, bubbly and fun brand” for young females who are “fashionable, spontaneous, flirtatious and empowered”. The company that markets this vibrantly-packaged vodka-based drink has adopted an interactive product development strategy that, according to their marketing director, aims to “interact with both loyal and new customers.”

One element of this strategy is the ‘Pick Your Party, Make Your Mix’ competition, which culminates in the creation of a new flavour each summer. The competition is promoted via the Vodka Cruiser website, social media and mobile messaging. To enter, participants are invited to suggest a colour, flavour, description and name for a new Vodka Cruiser drink. Entries are made via the slickly packaged, vibrantly coloured and highly interactive Vodka Cruiser website, which features interactive colour tools to assist in designing the new drink’s packaging, along with video clips of a young male bartender who guides entrants through the process. A ‘celebrity judging panel’ then selects a shortlist of the five best entries and, to determine the winning entry, the public is invited to comment and vote upon the shortlisted entries. Facebook and other social media are used to reveal and track the entries and voting patterns of friends, thereby encouraging an ongoing dialogue with the campaign audience and expanding the reach of the campaign. At the culmination of the competition, the winning entrant receives \$10,000 in cash and tickets to attend a VIP event to launch the new drink – all timed to ensure their drink is available on retail shelves for the summer season.

Branding and brand stretching

The growing complexity and multifaceted nature of contemporary alcohol marketing reflects a shift in the role of brands and a departure from traditional advertising approaches. Given the proliferation of marketing mediums and the commercialisation of youth culture, the marketing of brands has taken on a new dimension in the everyday social lives of young people (Casswell 2004). Brands are used as expressions of lifestyle and identity and, accordingly, identification with particular brands helps to define and communicate group identity, social status and aspirations. As one marketing theorist has written, the “presence of a brand (or even the attitudes held toward it) can serve to define a person with respect to others”, such that the “brand becomes an extension or an integral part of the self” (Aaker 1996:156).

In this context, branding involves much more than simply cultivating a public image through advertising. Unlike traditional 'push marketing', contemporary branding incorporates brand imagery and references into the flow of experience and everyday life. Instead of static advertisements that promote the benefits of a particular brand, brands are dispersed and embedded across a range of settings and contexts, appearing within the entertainment young people consume on television or online, sponsoring the venues or youth festivals they frequent, and featuring in the conversations and online profiles of friends and acquaintances. A brand therefore appears as a passive but pervasive background reference, permeating the settings that connect the brand to a particular set of values or attributes, but doing so in a way that is not identifiable as conspicuous advertising. By becoming an indelible part of an experience or lifestyle, a successful youth brand is not simply attached to a subculture, but is positioned as one of its defining features.

One manifestation of this approach to marketing is the phenomenon of 'brand stretching'. This technique involves stretching a brand across product categories, using alcohol brand names or logos on non-alcoholic merchandise or services. This approach not only adds to the reach and visibility of a brand, but also enables marketers to circumvent advertising restrictions. In this regard, the marketing activities of the alcohol industry mirror the tactics of the tobacco industry, who pioneered brand stretching. The purpose of this marketing tactic was summed up in an internal document from the multinational tobacco company, Philip Morris, which was prepared in 1979 in response to mounting public criticism of tobacco advertising²:

Opportunities should be explored... to find non-tobacco products and other services which can be used to communicate the brand or house name, together with their essential visual identifiers.... The principle is to ensure that tobacco lines can be effectively publicised when all direct lines of communication are denied.

(1979; quoted in ASH n.d.)

The use of this approach by alcohol companies is reflected in the popularity of alcohol-branded merchandise among young people. Alcohol brand names or logos can be found on clothing, fashion accessories, watches, mobile phone apps, and various other products. Ownership of these goods helps to cement familiarity and attachment to a brand, enabling young people to "try on" the image of a drinker, or to symbolise their identification with a particular beverage (Henriksen et al. 2008; McClure et al. 2006). In Australia, branded merchandise associated with sporting or music events is particularly popular among adolescents. Free promotional gifts, offered when alcoholic beverages are purchased, typically feature the alcohol brands most popular among young people (Jones & Barrie 2010). These gifts often end up being given to underage children and adolescents, even though Australian laws restrict the sale of alcohol to people over the age of 18 (Jones & Barrie 2010). Studies suggest that young people who own such items are more likely to attribute positive qualities to alcohol brands (Jones & Barrie 2010), and are more likely to commence drinking at a young age (Hurtz et al. 2007; McClure et al. 2006).

² Similarly, when tobacco advertising bans were introduced in France in 1979, the manufacturer of Camel cigarettes recommended the Camel brand be used for "lifestyle products", with the expenditure used to promote such products "hermetically separated from the tobacco company" (quoted in ASH n.d.).

Box 5. Alcohol-flavoured food and cosmetics



There has been a proliferation of alcohol-flavoured foods in recent years. For instance, Jim Beam has developed a number of branded food products with direct appeal to children and adolescents under 18 years. This includes Jim Beam flavoured potato chips, pretzels, and Domino's pizzas. Many of these products can be viewed and purchased in places commonly visited by children, such as supermarket confectionary aisles and major retail stores.

Alongside the various alcoholic-flavoured sweets and snack foods, some companies now offer alcoholic-flavoured cosmetic products, such as the 'cocktail-inspired' range of lip glosses developed by Sheigo.

From a marketing perspective, such products have several advantages. Firstly, they circumvent most existing regulations regarding marketing and the placement of alcoholic products. This was highlighted in a recent ruling by the regulatory body governing alcohol advertising in Australia, who dismissed a complaint relating to vodka-flavoured lip-gloss on the basis that the advertising code 'does not purport to govern all forms of alcohol marketing, but is directed at "advertising"' (ABAC 2011:10). Second, within the marketing industry, it is widely recognised that brand preference begins before purchase behaviour begins (Story & French 2004). Thus, by flavouring sweet or salty foods that are popular with children, alcohol companies such as Jim Beam are introducing young consumers to their brand at an early age, encouraging them to develop familiarity with, and loyalty to, their product.



Point-of-sale marketing

In addition to free gifts, a range of promotional activities or materials can be found in the stores and venues from which alcohol is purchased (Jones & Barrie 2010; Jones & Smith 2011). This may consist of conspicuous signage, competitions relating to a particular brand, price promotions, or price discounts for bulk purchases. Within pubs and clubs, point-of-sale marketing often takes the form of 'happy hours', 'free drinks for females', 'shooters', 'yard glasses' or 'all-you-can-drink' evenings. Several Australian studies have explored the extent and impact of such promotions, suggesting that the frequency of point-of-sale marketing has not only increased over time, but has also impacted on the alcohol-related intentions and behaviours of young people (Jones & Barrie 2010). In particular, one empirical study found that point-of-sale promotions are almost entirely associated with RTD products, which have been found to be the most popular drink among Australians aged 12 to 21 years (Jones & Smith 2011). These promotions frequently involve price or volume discounts, which are particularly effective in encouraging young people to purchase increased volumes of alcohol.

Box 6. Advertising expenditure of alcohol industry

The annual expenditure by the alcohol industry on marketing is substantial. Globalised alcohol manufacturers (for example, Diageo, Pernod Ricard Pacific) are among the biggest spending advertisers in Australia. The Preventative Health Taskforce estimates that industry spends at least \$120 million in measured forms of advertising, such as television, magazines, radio and billboards (NPHT 2009). However, the expenditure on unmeasured forms of marketing is growing and has been estimated to be between two and four times this amount, with alcohol sponsorship alone amounting to approximately \$300 million per annum.

Despite the recognised shifts of expenditure towards below-the-line or unmeasured forms of marketing, precise figures that encompass the full range of marketing methods are difficult to acquire due to incomplete disclosure and the omission of certain types of marketing from expenditure statements. Techniques such as product placement have also been deployed in ways that circumvent the 'paid' aspect of marketing. Product placement for film or television, for instance, can involve barter arrangements where the advertiser supplies free products for the production crew, a free location for filming, or joint promotions of the film or program (McCarty 2004).

In short, then, reported figures for the annual advertising expenditure of the alcohol industry typically represent a fraction of the actual spend. Moreover, such figures do not capture the marketing expenditure of retailers (including the major supermarket chains), licensed venues, and other alcohol advertising that is not produced by alcohol manufacturers. Retail advertising has become increasingly prominent through press, radio, television, and at point-of-sale promotions.

Digital marketing and new media

The forms of advertising, marketing, and selling that are emerging as part of the new media depart in significant ways from the more familiar commercial advertising and promotion in children's television. Digital technologies are ushering in an entirely new set of relationships, breaking down the traditional barriers between "content and commerce," and creating unprecedented intimacies between children and marketers.

- Jeff Chester and Kathryn Montgomery (2007:31)

Over the past decade, the rapid expansion of digital communications has fundamentally altered the marketing environment. The growth of new media, comprising digital forms of communication such as the internet and mobile devices, has provided a powerful arsenal of new marketing tools and techniques. This transformation in the media and communications realm has not merely expanded the range of marketing tools, but is also changing the nature of marketing itself. Marketing communications are increasing interactive, ubiquitous, personalised and – critically – are frequently evading the scrutiny of regulators and policymakers.

Given the digital realm is so heavily trafficked by young people, such forms of communications have increased young people's exposure to alcohol marketing. According to a recent UK study, a third of young people aged 11–18 are exposed to online alcohol advertisements on a daily basis (Atkinson et al. 2011). Within Australia, young people have also been a leading force in the uptake of many digital platforms (Jones & Magee 2011; ABS 2011b). As these technologies – and the marketing techniques they enable – continue to innovate and evolve, it is critical that those interested in the health and wellbeing of upcoming generations identify and understand the extent and impact of digital alcohol marketing.

Social networking sites

With the growth and popularity of social media, networking sites such as Facebook, Twitter, MySpace and Bebo have emerged as major players in alcohol marketing campaigns. These sites offer numerous options for marketers. First, banner advertising provides companies with an easily identifiable and more traditional mode of advertising, with boxed ads appearing alongside the users profile or conversations. Second, on sites such as Facebook, a company can set up its own profile for users to 'like'. This allows companies to interact and engage with users, post updates and special offers to their followers' newfeeds, or instigate discussions. Facebook also offers event pages to invite users to sponsored parties, contests and other events; and applications made by third-party developers to play games and interact with other users. Thirdly, social networking sites such as Facebook and MySpace are honing a more aggressive and insidious form of marketing that tracks online conversations and profiles, and tailors specific marketing accordingly. As MySpace has explained to prospective advertisers, "the freely expressed data in a user's profile offers marketers more authentic, powerful, and direct targeting" (quoted in Chester & Montgomery 2007).

Alcohol companies have leveraged the interactivity of social media sites to create **viral marketing** campaigns. This word-of-mouth marketing strategy induces young people to pass on messages, images or other content to other sites or users, creating a potentially exponential growth in the message's visibility and effect. To accomplish this, marketers 'seed' the original message with an initial target group. This message may be in the form of an email, a humorous or risqué video, or a variety of incentives (such as a competition or free product) that encourages individuals to create and promote their own user-generated messages relating to a particular brand or product. This initial target group usually comprises opinion leaders and strongly connected members of social networks, who in turn endorse the message or the associated product, and thereby ensure its rapid diffusion through their own networks. When product endorsements are forwarded to friends and acquaintances in this way, they not only provide a means of rapidly disseminating promotional messages but, as peer endorsements, serve to amplify their persuasiveness. Peers and online friends effectively "displace the marketer as the source of the messaging" (Razorfish 2009:38), inadvertently becoming online ambassadors for particular brands and products.

Whilst the original message or image that goes viral may emanate from alcohol marketers, the effects of such industry-generated content are in turn amplified by the huge volume of user-generated pro-drinking references and images relating to alcohol consumption and binge drinking – the majority of which are accessible to social media users under the legal drinking age (Alcohol Concern 2011; Atkinson et al. 2011).

Buzz marketing is another technique frequently utilised on social media, and involves creating an excitement and anticipation about an alcohol product or related event. To create a positive 'buzz', marketers deploy a range of strategies that create the impression of spontaneous word-of-mouth enthusiasm. In addition to seeding messages or content with influential individuals and opinion leaders, some marketers are using a technique termed **astroturfing**. The term 'astroturf' is drawn from a brand of synthetic carpeting designed to look like natural grass. As the name suggests, the goal is to manufacture an impression of widespread grassroots support for a product, using fake identities, blogs and product reviews. Multiple online identities with authentic-looking profiles refer to and praise a product, participate in forums and conversation threads, and ultimately create the false impression that the views of the astroturfer are commonly held. Astroturfing software enables marketers to effectively generate an 'army' of product endorsers, who can in turn be embedded among the 'friends' and conversations young people engage with on social media.

The overall impact of these various marketing techniques is that conversations about brands, products and services are increasingly woven into the interactions of young people on social networks. Several recent studies underscore the extent to which alcohol references pervade the online interactions of young people. In a New Zealand study analysing the social networking site, Bebo, it was found that teenagers frequently presented themselves as regular binge drinkers, and were keen to associate themselves with alcohol brands (Griffiths & Caswell 2010). This was reflected in references to alcohol in personal profiles, uploaded digital photographs depicting drinking, and responses to online quizzes about their alcohol consumption levels, all of which served to generate "a form of group identity through their active participation in drinking culture" (Griffiths & Caswell 2010:3). Similarly, a recent content analysis of MySpace profiles of 17 to 20 year olds found references to explicit alcohol use in over half the profiles (Moreno et al. 2010; Moreno et al. 2012; see also Fournier & Clarke 2011; Hebden 2011; Casey et al. 2007). Such findings were echoed in a recent Australian study of university students, which found that over half of the young people selected an alcohol-related profile image (Ridout et al. 2012).

Online video websites

Online video websites are another digital medium where alcohol consumption and products feature prominently. YouTube is the most well-known online video website, and hosts user-generated videos and clips from television, movies, sporting events and music. References to alcohol are prevalent in the music clips, clips of celebrity drinking, user-generated videos of drinking games, and user-generated remakes of official alcohol advertisements. Many previously-aired alcohol television adverts - including those that breach advertising codes relating to youth appeal - have gained a new lease of life on YouTube, frequently reaching a larger audience than when they were initially aired on television (Alcohol Concern 2011; Brooks 2009).

New technologies have also given rise to a digital incarnation of product placement, known as virtual product placement. This technique involves grafting digital images of products onto online videos. These images can be dynamically switched based upon such factors as demographics, psychographics or behavioral information about the consumer.



Box 7. The marketing mix: integrating online and offline marketing

Within the alcohol industry, marketing strategies typically combine multiple technologies and channels. The component parts of this marketing mix do not operate in isolation, but are mutually reinforcing and synergistic. In this way, young people are exposed to an accumulation of images, associations, and messages relating to alcohol consumption, with brands embedded in everyday interactions and lifestyles.

An illustration of this integrated approach to marketing is the Smirnoff cross-digital and offline treasure hunt in Australia, which formed part of the “Smirnoff Secret Experience Party 2008” campaign. In order to gain admission to what was billed as “the biggest free party” in the country, one had to find tickets that had been placed “in the real world across Australia”. Clues were placed on an “underground blog,” mobile sites, Facebook, YouTube, and other online locations; a “GPS ticket tracker” was switched on periodically, with alerts sent out to help drive contestants’ involvement with the campaign.

Viral marketing features are often embedded into online sites, and this technique has been deployed in a number of innovative alcohol marketing strategies within Australia. Alcohol companies, such as Diageo (Smirnoff Vodka) and Lion Nathan (Hahn beer), have launched effective online viral campaigns using the Australian company, Soup. Soup sends free product samples to registered members under the guise of soliciting feedback but, more importantly, generates word-of-mouth marketing about new goods entering the marketplace. When members join Soup, they must complete a profile which includes questions about hobbies, interests, occupation and contacts in their mobile and email accounts. Members are asked to describe how often they endorse products to friends, if they see themselves as leaders among their peers, and how important it is for them to be the first to try a new product.

Brand websites

Most alcohol brands have a dedicated alcohol website. These websites feature much more than simply information about the product, and typically include sporting or music sections, games, downloads, competitions, and blogs. For example, the homepage for Smirnoff Vodka contains a bar guide and listing of upcoming events; opportunities to enter competitions; video interviews with fashion designers, DJ's, and musicians; and various interactive features that are regularly updated. Content analyses of branded websites show that young people are targeted using images and language that resonate with youth culture, and through interactive games and contests, audio downloads of rock music, make-your-own-music-video features, and community-building chat rooms and message boards (Gordon 2011).

The screenshot shows the Smirnoff Nightlife Exchange website homepage. At the top, there is a navigation bar with the "NIGHTLIFE EXCHANGE" logo, a "BE THERE" slogan, and social media links for YouTube, Twitter, Facebook, and LinkedIn. Below the navigation bar, there are four main menu items: "DANCE 4 MADONNA", "SMIRNOFF DRINKS", "WHAT'S HOT", and "THE MIX". The main content area features a large banner for "CONGRATULATIONS LIL BUCK" with a photo of Madonna performing. Below the banner, there are several promotional tiles: "EXCLUSIVE CONTENT OFFICIAL VIDEO: MADONNA - GIVE ME ALL YOUR LUVIN", "EXCLUSIVE PROMO TRY THE OFFICIAL DRINK OF INTERNATIONAL NIGHTLIFE", "NIGHTLIFE EXCHANGE PROJECT 2011 WHERE WERE YOU WHEN THE WORLD SWAPPED NIGHTS?", and "EXCLUSIVE CONTENT GLOBAL NIGHTLIFE GUIDES, PHOTOS AND INTERVIEWS". On the right side, there are two more promotional tiles: "WERE YOU THERE WHEN 50 CITIES SWAPPED NIGHTLIFE? TAKE A PEEK AT THE CULTURAL EVENT OF THE YEAR." and "THE WORLD'S BEST DRINKS START WITH SMIRNOFF TRY DRINKS FROM AROUND THE GLOBE". The footer contains links for "Terms & Conditions", "Privacy & Cookie Notice", "Drink Responsibly", "Accessibility", "DrinkIQ", "The_Bar.com", and "COPYRIGHT © 2011 THE SMIRNOFF".

For many children and young people, alcohol brand websites are not only appealing but also readily accessible. Studies have indicated that online search engines often yield links to alcohol brand website for non-related word searches, such as searches for games, entertainment, music, free give-aways, competitions, and free screensavers (Alcohol Concern 2011). Moreover, age affirmation mechanisms, which appear prior to entering alcohol websites, are easily circumvented (Gordon 2011).

Online games and advergaming



Over the past decade, interactive and online games have become a key form of entertainment for many children and young people. This has in turn given rise to a new generation of marketing companies that specialise in the integration of brands into interactive games, a phenomenon that has been termed 'advergaming'.

Advergaming can essentially take three forms. The first consists of online games that are hosted on a company website or on a gaming site that is sponsored by the company. Such games appear on many alcohol brand websites, and feature brand names, logos, bottles and characters associated with the particular brand. A second type of advergaming is also specifically created to promote a particular brand or product, but is played on traditional gaming consoles or computers. The third form is effectively a form of product placement, with brand imagery and references embedded within existing games that are played on gaming consoles. Like other forms of product placement, the commercial intent of this form of advergaming (sometimes referred to as 'in-game advertising') tends to be less explicit.

Marketers are becoming increasingly sophisticated in their use of advergaming. Through "dynamic product placement", brands are not only integrated into the game's storyline, but can also respond to a player's actions in real time, with branded imagery or messages being added or updated to tailor their appeal to that particular individual (Chester & Montgomery 2007:49). Brands can feature as passive background props (as part of the game scenery), or as active equipment, items that players collect, or as characters. The overall effect is to expose players to brand references for extended periods of time, and to do so in a way that is interactive and highly engaging.

Mobile marketing

The ubiquity of mobile phones gives marketers unprecedented ability to follow young people through their daily lives, delivering highly enticing marketing offers that are designed to trigger impulsive behaviours and linking point-of-influence techniques to point-of-purchase opportunities, thus short-circuiting the possibility of reflection or deliberation...

– Kathryn Montgomery and Jeff Chester (2011)

The rapid growth of mobile-phone communications and their integration into young people's lives has taken alcohol marketing to a new level, raising serious public health concerns in the process. Mobile devices provide an ever-present platform through which other marketing techniques can converge. Smartphones enable access to an array of Internet applications, videos and interactive games, Facebook and other social networks, in addition to delivering "call-to-action" prompts via text messaging. A further marketing advantage of mobile phones is their ability to capture extensive user information, merging sophisticated data collection and behavioural profiling techniques with location tracking. A number of alcohol companies have capitalised on these features to execute highly targeted and effective marketing campaigns, and the central role of mobile phones in marketing to young people is expected to grow over the coming years.

Box 8. Apps and alcohol: harnessing the power of mobile communications

The powerful marketing potential of mobile phones is illustrated by the abundance of mobile phone applications ('apps') associated with alcohol brands. Examples include:

- **Absolut Vodka's 'TalkAbout Kahlua'** is designed to enliven social discourse and drinking. To achieve this, users enter details about the context they are in, including the nature of the social situation (e.g. at dinner), who they are with (e.g. a date), and the topic of conversation (e.g. technology). The TalkAbout app then provides suggestions for current, relevant and interesting things to say, personal and funny questions to ask, and drinks to enjoy.



- **Absolut's 'Drinkspiration'** is designed to "help you order or remember a cocktail to match the moment's mood, weather, colour, time, location, bar vibe and more". Users can access an interactive encyclopaedia, which provides up-to-the-minute global drink trends, and displays advice on trendy drinks, drinks with an edge, drinks to fit the bar scene they are in, and even drinks based on the type of glass they want to use. The app also links into social networking sites, enables users to share their own comments, provide their own rating on different drinks, and reveal to their own networks what drinks they are consuming. By connecting to Facebook or Twitter in this way, the app enables users to "share drinks with friends [as the] drinks you are having will be displayed in your status updates on your wall".



- Malibu Rum** has been particularly effective at leveraging the features of mobiles. In addition to locally executed text messages to support events and sponsorship, the company has developed a number of popular iPhone apps, including the Malibu Drumming Game app (that challenges users to follow and drum along to the beat on their iPhone), Radio Maliboom Boom app (that allows users to “tune in to the sweetest and toughest Caribbean sounds around”), and the ‘Island Bowling Game’. The bowling game app, which was launched as part of a wider online and offline campaign, allows users to bowl in a range of locations (a rum shack, the beach, in an underground cave, or in an aquarium). Malibu bottles feature prominently throughout the game as the bowling pins – ensuring that while the user is playing the game they continue to associate fun with Malibu – and ultimately keep the drink front of mind. According to the marketing agency that developed the app, the thinking behind Malibu Island Bowling is to “help shift brand perceptions of Malibu” and broaden the contexts in which people would consider consuming the drink: “the more time people spend with Malibu, the more consumers will understand that Malibu isn’t just a drink for a summer day on the beach, it’s about experiencing that feeling at anytime, anywhere”. The company also expanded the Malibu Rum mobile site, providing drink recipes, downloadable content (e.g. ringtones, wallpapers), YouTube videos and product information.
- Diageo’s** TheBar.com has multiple features, including an extensive catalogue of cocktail recipes (with weekly updates), special offers for Diageo drink brands, a ‘Cocktail Shaker’ feature that supplies a random cocktail recipe when the phone is shaken, recommendations for drink and food pairings, and features that allow the user to share drink recipes and favourite drink brands through Facebook and email. In certain geographic locations, this app also enables users to search nearby stores for drinks or cocktail ingredients, or to locate nearby bars, nightclubs and other social venues.
- The **Bundaberg Rum** footy tipping app augments more traditional marketing strategies, such as sports sponsorship and heavy advertising during live broadcasts of the National Rugby League competition.
- The Time Out & **SMIRNOFF** iPhone app features geolocation technology that lets users view recommended activities around their exact position within seconds, complete with event previews. It provides a comprehensive listing of events and things to do ranging from music gigs, bars, clubs, art, theatre, restaurants, and film releases, in addition to indicating what local outlets supply specific Smirnoff beverages. The app is updated every four hours, is available for major cities in Australia, and is modelled on a popular app originally developed for London. According to the marketing agency that developed the app, it is a central part of the ‘BE THERE’ global marketing campaign for Smirnoff Vodka, providing “a direct call to action inviting consumers to create, seek out and participate in extraordinary shared experiences. It is all about those exceptional, unexpected and inexplicable moments in your life – the times you would look back on and say, ‘I was there.’ The Time Out app collaboration brings the Smirnoff BE THERE philosophy to life and demonstrates the brand’s commitment to helping consumers find one of a kind experiences”.



Data collection and behavioural profiling

An important feature that distinguishes online and mobile marketing from traditional forms of advertising is the use of sophisticated data-mining technologies and behavioural targeting. When individuals access online services, they are tagged with a unique identifier. This is then used to track browsing behaviour, purchasing habits, and other personal data – whether the individual is updating their social media account, using a search engine, watching an online video, making an online purchase, receiving an email, or playing an interactive video game. The interactive nature of digital technologies also makes it possible for data collection tools to be woven into the content and design of online or mobile marketing campaigns (see Box 9). Most campaigns are designed to encourage users to provide personal data, such as mobile phone numbers, email addresses and personal preferences. Users typically provide such information in order to access competitions, ‘free’ offers, and ‘point’ schemes.

Box 9. Integrating data collection into marketing campaigns



Some marketing campaigns are designed with the express purpose of collecting data, which can in turn be used as a basis for future targeted marketing. An example is Jim Beam’s ‘Spin & Win’, a promotional game for iPads that mimics a game on the pokies and is presented to pub patrons by the Jim Beam Party Crew. To play the game, participants must initially enter their contact details and social networking account details. According to the advertising agency who developed this game, its primary marketing function “is to capture consumers’ data on the fly and automatically send it to Jim Beam’s consumer database”.

Once collected, this data can be analysed and combined with offline data using sophisticated software systems. Consumers generate even more personal data by using their mobile phones, including geographic location data based on the physical movement of their mobile devices. This provides information not simply about what consumers do, but where they do it.

The result of these various data collection tools is a detailed profile that provides insights into the individual consumer's tastes, needs, and purchasing habits, enabling marketers to craft and refine marketing strategies directly targeted to the individual's specific interests. For consumers with mobile devices, highly targeted messages and promotional offers can be triggered as they approach a bar, club or retail outlet selling a specific brand of alcohol. In addition, data mining enables marketers to identify and target 'influencers' and 'trend setters' (who in turn act as brand advocates). Marketing agencies can track and analyse consumer responses and behaviours to improve their products or services and, depending on what is and is not working, to refine their marketing strategy and media mix instantaneously.

Box 10. Harnessing the power of social networking, online communications and data-mining

The leading global alcohol companies have enthusiastically embraced online advertising, forging multi-million dollar partnerships with the major social networking platforms and online advertising companies. To maximise the marketing potential of online and mobile communications, a number of alcoholic beverage brands have been at the forefront of partnerships with the major social networking platforms and internet-based services.

In August 2011, Heineken became one of the first major international brands to sign an advertising deal with Google. The multi-million dollar contract provides unprecedented access to YouTube video sharing, mobile advertisements, banner promotions, and user data (i.e. data that profiles users by tracking search queries and websites visited).

Similarly, in September 2011, Diageo announced that it had struck a deal with the social networking site Facebook. According to Diageo's media release, the twelve months prior to the deal had provided a strong return on advertising investment, with its Facebook fan base expanding from 3.5 million to 12 million and the Diageo brand, Smirnoff, becoming the most popular beverage alcohol brand on Facebook. Diageo states that its brands have collectively enjoyed a 20 per cent increase in sales "as a result of Facebook activity". The Diageo-Facebook deal aims to consolidate Diageo's expansion into social media by "push[ing] the existing boundaries of social media through co-created experiments leveraging the full capability of the platform". This includes collaboration around marketing campaigns from concept development, through to campaign creation to execution; the provision of metrics from Facebook to measure the results of social media activity, and to refine and hone their marketing accordingly; and the training of the Diageo employees from across the world in "Facebook boot camps".

Sponsorship of sporting and cultural events

...the expectation is that the favourable emotions and images which consumers have of the event itself transfer to the sponsoring brand, creating an unthinking association in consumers' minds between the event and the brand, positive attitudes, and emotional connections. Because of the social setting and enjoyable shared experience, consumers are assumed to be more involved and more receptive than they might be to more overt forms of marketing.

– Professor Gerard Hastings (2009)

In Australia, alcohol companies sponsor various events, ranging from grassroots sports activities and local art exhibitions, through to major sporting events and music festivals for young people. The sponsorship of such events provides marketers with a receptive audience primed to have a good time, in addition to offering commercial opportunities such as exclusive rights to sell their brand (i.e. 'pourage rights'), naming rights, and the ability to promote their brand through signage, merchandise, and products associated with specific events or teams.

This extent of this sponsorship is most apparent in the sporting arena, which receives an estimated \$300 million each year from the alcohol industry (NNPHT 2009). In elite sports, alcohol sponsors are highly visible in the clutter of logos, brands and slogans on player uniforms and sporting grounds; in the naming rights of teams and events; and through the proliferation of associated merchandise (including toys) that carry the sponsor's logo (Sherriff et al. 2009). For grassroots sports, alcohol sponsors promote their products through various means, such as purchasing branded jerseys or club equipment, and offering free or discounted alcohol (Mallam 2006; Turner 2007; Sawyer et al. 2012; Kelly et al. 2010, 2011a, 2011b, 2011c).

Box 11. Elite sports and alcohol sponsorship: Australian examples



Within Australia, alcohol sponsorship is evident in a number of elite sporting events including:

Rugby Union – Tooheys New, Bundaberg Rum, Steinlager, Guinness.

Rugby League – Foster's Lager, Bundaberg Rum, Victoria Bitter.

Australian Football League – Carlton Draft.

NASCAR Racing – Jim Bean, Jack Daniels, Diageo/Crown Royal.

Formula One Racing – Foster's Group, Becks, Budweiser, Diageo.

Golf – Diageo, Johnnie Walker.

Cricket – Red Stripe, Victoria Bitter, XXXX, Thwaites Lancaster Bomber, Wolf Blass Wines.

In addition to sport, music and arts events have become a key focus for alcohol sponsorship. For example, the 'Big Day Out' music festival derives a large proportion of its sponsorship from various alcohol companies. In addition to signing a two-year deal with the distributor of Jim Beam and Canadian Club spirits in 2010, recent sponsors of the Big Day Out festival include Toohey's Extra Dry, Smirnoff, Strongbow, and Jagermeister. This festival attracts large numbers of young people, and admits people as young as 15.

Jim Beam's involvement in the Big Day Out festival is part of its wider campaign titled 'The Label Behind Live Music', which sees Jim Beam supporting music acts through a growing number of music festival sponsorships as well as continued partnerships with key live music venues throughout Australia. The Jim Beam website accompanying this campaign features competitions for tickets, auctions for 'money-can't-buy' items, and internship opportunities for young people aspiring to be journalists or photographers. In addition, Jim Beam has a website specifically pitched at young people attending university, www.JimBeamOnCampus.com.au, which has been active since 2004 in supporting on-campus live music and sporting events with the help of 'Jim Beam campus ambassadors'. As a spokesperson for Jim Beam stated in 2002:

We're focusing fairly strongly on recruitment to Jim Beam. We're aiming to make it relevant to the new age of drinkers coming through. We don't want them seeing Jim Beam as a drink for oldies or bikies

(DrinksBiz Industry magazine, quoted in Alcohol HealthWatch 2003).



Like other forms of marketing, sponsorship provides alcohol companies with a platform to develop positive associations with their brands. In addition to enhancing the perception that the alcohol industry is “a good corporate citizen”, sponsorship is a powerful means of tapping into youth audiences. Embedding alcohol brands in the entertainment or sporting culture communicates a legitimacy and status to alcohol, strengthening the association between alcohol and the positive effects of having a good time. Sports sponsorship further serves to link alcohol with sporting prowess, fitness and masculinity (Alcohol Concern 2011; Jones et al. 2010). Empirical evidence from several consumer studies demonstrates this linkage, indicating that sponsorship has an impact on product recall and product-related attitudes and behavioural intentions (Kelly et al. 2010; Jones et al. 2010; Kelly et al. 2011b; Polonsky & Speed 2001; Alcohol Concern 2011), as well as enhancing a sponsoring brand’s image. These effects, moreover, have been found to impact on children and young people who viewed events sponsored by the alcohol industry (Jones et al. 2010; Alcohol Concern 2011; Kelly et al. 2011b). Alcohol sponsorship has also been shown to increase drinking and hazardous consumption among those sponsored (O’Brien et al. 2011).

Although alcohol industry groups oppose moves to prohibit alcohol sponsorship, a ban on this type of sponsorship appears to have widespread community support in Australia. Results from a VicHealth survey of 1,500 Victorians indicated that a majority were opposed to alcohol sponsorship. Of those surveyed, 83 per cent supported the removal of alcohol sponsorship from clubs if help was given to replace lost revenue, and a further 76 per cent supported a levy on alcohol advertising if the funds generated from the levy were allocated to community sports (VicHealth 2010).

Box 12. Restricting alcohol sponsorship of sports

The alcohol industry maintain that imposing restrictions on alcohol sponsorship would lead to the demise of local sporting events and teams, and potentially result in Australia missing out on opportunities to host international sporting events and competitions. Experiences overseas and within Australia, however, challenge such arguments.

A number of countries have banned alcohol sponsorship without any significant impact on cultural and sporting sectors. The sponsorship of sports by alcohol brands is prohibited in France, Norway, Denmark, Russia, Costa Rica, Croatia, Turkey, Jordan, Mauritius, Algeria, Qatar and Indonesia. Although France has had a longstanding ban in place, it has successfully hosted various international sporting events, such as the 1998 FIFA World Cup and, most recently, the multi-nation Heineken Cup Rugby competition. The latter event was renamed the H-Cup in France and references to the alcohol beverage company Heineken were omitted from media coverage and merchandise associated with the event. The fact that upcoming Football World Cups are to be hosted by two countries which ban alcohol sponsorship of sports – Russia (2018) and Qatar (2022) – suggests that alcohol sponsorship bans do not undermine the capacity to host international sporting events.

In terms of potential impacts on sporting events in Australia, the experience of banning tobacco sponsorship is instructive. Given the mass appeal and intense commercialisation associated with elite sports, sponsorship of an elite sporting team or event is a highly sought-after promotional opportunity. As was the case with the ban on the tobacco industry, it is likely that the withdrawal of alcohol industry sponsorship would result in other corporations lining up to fill the void.

For local or 'grassroots' sport, a number of measures can be undertaken to reduce any adverse impacts that might arise from the withdrawal of alcohol sponsorship. In Australia, both State and Commonwealth governments have implemented programs that provide a replacement source of funding for activities sponsored by alcohol. When Health Promotion Foundations such as VicHealth (Victoria) and Healthway (Western Australia) were initially established, a key function was to provide alternative sources of funding for sports and cultural organisations reliant on tobacco sponsorship. More recently, the Federal Government established the Community Sponsorship Fund to provide alternatives to alcohol industry sponsorship for local sporting and cultural organisations and events and, in exchange for Federal Government funding, twelve of Australia's top sporting Codes signed a pledge to shun alcohol sponsorship. To expand these funding programs, some commentators have suggested that, much like was done with tobacco, a proportion of the excise duty currently gathered by governments from alcohol sales could be set aside (hypothecated) for funding sporting and cultural events (Kypri et al. 2009; O'Brien et al. 2011).

Box 13. Does the alcohol industry deliberately target young people?

The alcohol industry frequently maintains that young people are not the target of their advertising. However, a recent UK analysis of internal industry documents suggests otherwise (Hastings 2009). As part of the UK government's investigation into the conduct of the alcohol industry, the House of Commons Health Select Committee gained unprecedented access to internal industry communications from four alcohol companies and their ad agencies. This included meeting notes, client briefs, creative briefs, media briefs, advertising budgets and market research reports.

The central message of these internal industry communications is clear: upcoming generations are a key target for alcohol advertisers. Although internal documents mainly refer to this group as starting at the legal drinking age (18 years), this distinction is sometimes lost. Several companies use market research data on 15 and 16 year olds to guide campaign development and deployment, and consider products (referred to as "kids' drinks") in terms of their appeal to children (Hastings 2009:10). The need to recruit new drinkers and establish their loyalty to particular brands is a recurrent theme in campaign briefs and strategy documents. For instance, a key objective for the company promoting the beverage WKD is to engage with the "up and coming generation" through new product development. Reaching this group of young people is also a central focus for Carling, whose multi-pronged marketing strategy is designed to position the brand "as the most respected youth brand (overtaking Lynx)" (quoted in Hastings 2009:11). To achieve this objective, Carling concentrate efforts on students, music festivals and other events popular among young people. Thus, the music festival dubbed the 'Carling Weekend' aims to be "the first choice for the festival virgin", offering free branded tents and a breakfast can of beer (quoted in Hastings 2009:14). Such events are designed to engage with young people before they have developed a preference for other brands, and through the association with music, festivals, and youth events, Carling aim to secure brand loyalty. As Carling's campaign briefs imply, it is the association with such events (rather than direct or conspicuous advertising) that is key: "the band are the heroes at the venue and Carling should use them to 'piggy back' and engage customers' emotions" (quoted in Hastings 2009:34).

Such examples would appear to contravene the UK regulatory code for alcohol advertising, which is similar to the self-regulatory code that operates in Australia. Although some companies make genuine attempts to adhere to this, industry documents from the UK suggest that others deliberately set out to incorporate prohibited themes, but to do so in ways that do not obviously transgress the Code. For instance, in a briefing document for the WKD brand, it is acknowledged that linking alcohol consumption with intoxication or sexual activity flouts regulatory guidelines, but the “communications challenge” is to convey such links without explicitly falling foul of the rules: “this means we can’t rely on the staple ideas around getting pissed and shagging and need to be more creative and inventive with ideas” (quoted in Hastings 2009:48). Brand strategy documents and campaign briefs are replete with references to “unwise” and “immoderate” drinking: “getting pissed”, “blasted”, “things get messy”. Far from avoiding promotion of such behaviour as the Codes require, agencies harness it to maximise market opportunities. When developing a brand positioning for the drink Sidekick, for example, explicit reference is made to shots being “used to crank up the evening, accelerate the process of getting drunk”. Similarly, a creative brief for the drink Lambrini attributes campaign success to “quick female gags based on sex and drunkenness” and “aligning itself” with concepts such as “being naughty, rude, outrageous or badly behaved” (quoted in Hastings 2009:16,17).

While the UK investigation exposes how marketing is deliberately crafted to target young people, the comments of an industry insider in Australia suggest that this practice may not be unique to the UK. In 2007, Mat Baxter, from the marketing company who promoted the now-withdrawn beverage, Absolut Cut, admitted that young people are the primary target of companies marketing ready-to-drink alcopops. According to Baxter, alcopops had been designed to allow “people to get drunk quickly”, and there had been “a conscious effort to make those drinks more appealing to young people” (quoted in Stark 2007).

THE IMPACT OF ALCOHOL MARKETING ON DRINKING PATTERNS

Generally, there is a dose-response relationship between young people's exposure to alcohol marketing and the likelihood that they will start to drink or drink more. The greater the exposure, the greater the impact. The evidence thus suggests that limiting the kind and amount of alcohol marketing would reduce drinking initiation and heavy drinking among young people.

– World Health Organisation (2009c)

The previous chapter shows that alcohol marketing is a ubiquitous presence in the lives of young people. With the ever-expanding reach and sophistication of alcohol marketing, the question of how it impacts on young people's alcohol consumption demands closer scrutiny and attention. Early attempts to answer this question were often based on crude research models, which yielded inconclusive results. However, over the past decade there has been a proliferation of studies with increasingly sophisticated and rigorous research methodologies. In this section, we review this substantial body of research, revealing a growing consensus that alcohol marketing shapes young people's decision to drink, and how they drink.

Alcohol marketing and total population consumption

The relationship between marketing and consumption is complex, and marketing effects are invariably embedded in a myriad of social and environmental factors shaping consumer decisions and behaviours. A range of research methods has therefore been adopted to examine the influence that marketing has on alcohol consumption.

Many early attempts to measure the impact of alcohol advertising were based on econometric research models, which examine the correlation between the amount of advertising in a particular jurisdiction (typically in terms of advertising expenditure) and the amount of alcohol being consumed (typically in terms of sales). This approach rests on the hypothesis that, if marketing does have an effect, rates of alcohol consumption should vary according to the amount of advertising.

Econometric studies have produced mixed results, and inherent methodological weaknesses limit the application of such findings (see Box 14). Some econometric studies have shown no discernable impact from alcohol marketing on consumption levels, while others have found small effects. In a meta-analysis undertaken in 2007, the findings from 132 econometric studies were reviewed and synthesised to reveal a small positive elasticity between alcohol advertising and alcohol consumption (Gallet 2007). That is, econometric studies have generally found that alcohol marketing does contribute to the level of alcohol consumption, but the impact is small and more pronounced for certain types of alcoholic beverages, such as spirits.

Box 14. Why the alcohol industry's selective use of research misrepresents the evidence base

The alcohol and advertising industries steadfastly reject the link between marketing and alcohol consumption. Two key arguments have been put forward to justify this stance. Firstly, industry groups cite certain econometric studies that suggest advertising has a negligible impact on consumption. Although some econometric studies have shown alcohol marketing does contribute to alcohol consumption (e.g. Gallet 2007; Saffer & Dave 2006), the findings are inconsistent and inconclusive. Second, the alcohol industry contends that, in a mature market where overall consumption levels are stable, marketing only influences the choice of brand, and not overall drinking behaviours or levels of consumption.

These two arguments have, however, been challenged on a number of levels.

The selective use of econometric data not only obscures the full weight and range of research, but also ignores the methodological flaws inherent to this research methodology. Firstly, most econometric studies use advertising expenditure data as a proxy for consumption levels. Expenditure data, however, varies in accuracy and inclusiveness, and neglects expenditure on 'below the line' promotional tools such as sponsorship, the use of new media, and viral marketing. This consideration is all the more critical given the cost-effectiveness of much digital marketing, which can leverage small amounts of money into campaigns capable of maximising reach exponentially.

Second, such research rests on the assumption that advertising spend accurately reflects advertising effectiveness. This assumption has been challenged within the marketing literature (Chung & Kaiser 1999), and overlooks factors such as the duration of advertising effects (a powerful campaign may continue to have effects years after it was first deployed), and variations in the content, execution and media mix utilised in marketing (for instance, deftly executed online or viral marketing campaigns may be relatively inexpensive but have extensive reach and impact). Third, econometric analyses depend on the construction of a complex model that ascribes values for all the different variables that might be implicated (Saffer 1996). Robust data for many of these variables is, however, lacking. Fourth, such studies are unlikely to measure variations in effect unless there are significant changes in the amount of advertising taking place. However, alcohol marketing displays little variation in expenditure over time as a proportion of the total. Finally, such studies focus on whole populations, masking the effect that alcohol marketing may have on particular groups. Econometric studies, therefore, do not provide insights into the specific effects of marketing on young people.

Research that does investigate the effects of alcohol marketing on young people undermines industry claims that, in the context of a saturated market, advertising and promotions influence the choice of brand rather than stimulating demand. Longitudinal and cross-sectional studies have demonstrated an association between exposure to alcohol marketing and earlier uptake of drinking, as well as more frequent and heavier drinking. Moreover, as a UK analysis of internal industry documents reveals, encouraging and maintaining new cohorts of young drinkers is an important investment for the alcohol industry (Hastings et al. 2010; Casswell 2004). In established markets such as Australia, the loss of heavy drinkers through natural attrition means that new cohorts of drinkers must be constantly sought out and, given heavier drinking is concentrated in the late teenage years and early adulthood, the youth sector constitute an important source of immediate and future revenue.

Alcohol marketing and the beliefs and behaviours of young people

While most econometric studies are fraught with methodological problems, a considerable and robust body of research has emerged from Australia and overseas that shows alcohol marketing influences alcohol consumption amongst young people. One strand in this field of research consists of cross-sectional studies, which take a snapshot of advertising exposure and levels of drinking and discern correlations between the two. Such studies have been undertaken across a range of jurisdictions, and have examined a diversity of marketing techniques and formats including television advertising (Morgenstern et al. 2011; Gunter et al. 2009); magazines and print media (Garfield et al. 2003); alcohol-branded merchandise and promotional items (McClure et al 2006); point-of-sale promotions (Hurtz et al. 2007; Kuo et al. 2003; Jones & Barrie 2010; Jones & Smith 2011); billboards and outdoor advertising (Jones & Magee 2011); internet and new media (Jones & Magee 2011; NCASA 2011; Ridout et al. 2012; Gordon et al. 2011; Atkinson et al. 2011); and product placement in movies (Sargent et al. 2006; Hanewinkel et al. 2007; Hanewinkel et al. 2012).

These cross-sectional studies have consistently found a strong positive association between advertising exposure and alcohol consumption among young people. This is illustrated by a recent study undertaken in Australia, which involved a cross-sectional survey of 1113 adolescents aged 12 to 17 years (Jones & Magee 2011). This study explored the relationships between multiple drinking behaviours (initiation, recent consumption and regular consumption) and various types of advertising (television, magazine, newspaper, internet, billboard, bottleshop, bar and promotional material). Alcohol advertising across a range of mediums was found to strongly influence the drinking patterns of young people, with the impact most pronounced for female adolescents.

The close association between alcohol marketing and consumption has been further supported by longitudinal studies. While cross-sectional studies have provided ample evidence for a correlation between marketing and consumption, they do not demonstrate whether this correlation is due to marketing causing consumption, or whether young people who drink or misuse alcohol are more receptive to alcohol marketing. In contrast, longitudinal research methods capture data at several points in time, thereby providing a powerful methodological technique for untangling cause and effect.

Although they are expensive and complex to implement, rigorously designed longitudinal studies are generally regarded as the most effective means of examining the effects of exposure to alcohol marketing on the drinking behaviour of young people. A large number of such studies have been undertaken over the past two decades, and these have in turn been subjected to several systematic reviews which have concluded that advertising does have an effect on young people's drinking (Anderson et al. 2009; Smith & Foxcroft 2009; Booth et al. 2008). These comprehensive reviews not only provide compelling evidence for the impact of alcohol marketing, but also indicate that the effect of such marketing operates at a number of levels. Alcohol marketing has been found to influence the age at which drinking commences, the volume and frequency of drinking, and alcohol-related beliefs and attitudes. Further, these effects have been found to be cumulative, becoming more pronounced as the volume of advertising and promotions increases. After reviewing 13 longitudinal studies involving over 38,000 young people, Anderson et al. (2009) state:

Based on the strength of [the association between marketing and drinking], the consistency of findings across numerous observational studies, temporality of exposure and drinking behaviours observed, dose-response relationships, as well as the theoretical plausibility regarding the impact of media exposure and commercial communications, we conclude that alcohol advertising and promotion increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol.

(Anderson et al. 2009:1)

Explaining the effects of alcohol marketing

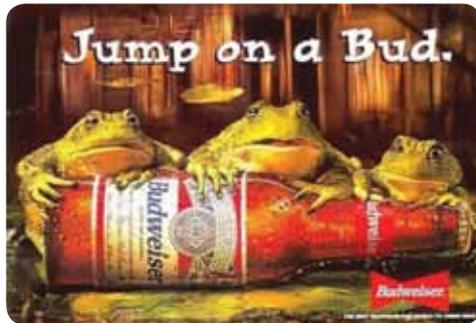
With a substantial body of evidence demonstrating the impact of alcohol marketing on consumption patterns, a number of researchers have turned their attention to the question of how marketing achieves this effect. Their research suggests that certain biological and psychosocial attributes make children and adolescents uniquely vulnerable to advertising and promotions.

Several key factors have been found to heighten the susceptibility of children and adolescents to persuasion attempts in general, and to alcohol marketing in particular. Firstly, changes in the brain structure during adolescence reduce inhibitory control, making young people more susceptible to marketing (Pechmann et al. 2005). These neurological changes have been found to give rise to three distinctive vulnerabilities that in turn amplify the effects of marketing among young people: impulsivity, linked to a temporal gap between the onset of hormonal and environmental stimuli into the amygdala and the more gradual development of inhibitory control through the pre-frontal cortex; self-consciousness and self-doubt, attributable in part to the emergence of abstract thinking; and elevated risk from product use, including impulsive behaviour such as drinking and driving, in addition to greater susceptibility to toxins due to the plasticity of the developing brain, and greater sensitivity to the brain's 'stamping' functions identifying pleasure and reward (Pechmann et al. 2005).

In addition to neuro-cognitive factors, a range of studies has linked the effects of alcohol marketing to specific psychosocial and cultural factors. Longitudinal studies have explored the effects of alcohol not only on actual drinking behaviour, but also on beliefs, perceptions and expectancies surrounding drinking. While content analyses have shown that advertising frequently incorporates images and associations that appeal to young people, empirical studies suggest that young people drawn to these appealing elements not only believe that the positive consequences of drinking are more likely, but also tend to believe that their peers drink more frequently, and that their peers approve more of drinking (Chen et al. 2005; Austin et al. 2006; Fleming et al. 2004).

Box 15. The content of alcohol marketing and its appeal to young people

Alcohol marketing frequently deploys images, messages and elements that appeal to young people. Empirical studies have shown young people are drawn to music, characters, story and humour, and find the quirky, playful, and subversive elements of alcohol advertising appealing. The use of animal characters is known to engage children and younger audiences, and memorable animal characters such as the Bundy Bear (associated with Bundaberg Rum), Bud Frogs (Budweiser) and the charming lizard team of Frank and Louie (Budweiser) illustrate how alcohol companies have successfully deployed this strategy to promote their products.



The bud frogs - 'Bud', 'Weis' and 'Er' - featured in one of the most well-known international alcohol advertising campaigns of the 1990s.



Studies have indicated that the 'Bundy Bear' that features in advertisements for Bundaberg Rum are widely recognised and liked among young Australians.

Alcohol advertising often features sexualised and suggestive imagery, gender stereotypes, and content that links drinking with sexual prowess and success. Adolescents tend to be highly tuned to the gendered and sexualised imagery that pervades advertising (Borlagdan et al. 2010; Jones & Reid 2010). Some researchers have argued that for young people who are developing their sense of self and understanding of relationships, the persistent use of sexualised imagery and stereotypes normalises drinking as an essential component of sexual interactions (Jones & Reid 2010).



Outdoor alcohol advertisement at tram stop in Fitzroy, Melbourne



Budweiser advertisement



Skyy Blue advertisement

In addition to content analyses, research has found that adolescents and young people perceive alcohol advertising to be pitched towards them. A study undertaken by Jones and Donovan (2001) found that 25 per cent of 15 to 16 year olds thought advertisements for alcohol were aimed at their age group; 50 per cent of 19 to 21 year olds believed the same ads were targeting people younger than them.

Among adolescents, a key influence on alcohol use is the perception – or misperception – of what constitutes ‘normal’ drinking (Bertholet et al. 2011; McAlany 2007; Lintonen & Konu 2004; Read et al. 2002). Marketing places a key role in shaping and reinforcing perceptions that regular drinking is commonplace, sociable and expected (Roche 2008). These normative assumptions are shaped not only by the content of advertising but, more critically, by the sheer volume and variety of marketing. The prevalence of alcohol imagery and pro-alcohol messages serves to normalise drinking, conferring an implicit legitimacy to alcohol and creating a web of cues and messages that shape tacit beliefs and social expectations. For young people, repeated exposure to pro-drinking cues not only naturalises teenage drinking, but also leads to its adoption as a marker of group identity and a means of communicating social status and aspirations (Casswell & Maxwell 2005; Casswell 2004). Research suggests that adolescents tend to overestimate the amount their peers drink. As a result, they drink in a risky manner in an effort to match their drinking to their perception of drinking norms (Baer et al. 1991; Roche 2008:18). Moreover, studies have shown that persistent exposure to messages encouraging drinking undermines efforts to discourage underage drinking (Sanbonmaton 1998; Nicholls 2012).

In sum, the research literature presents increasingly compelling evidence that alcohol marketing impacts upon young people’s drinking behaviour. The convergent findings of longitudinal research and several systematic reviews have reframed the debate, shifting the focus beyond the issue of whether alcohol marketing has an effect on consumption, to an emphasis on what needs to be done to tackle the effects of alcohol marketing on young people. This brings the issue of alcohol marketing and regulation very much to the fore of the policy agenda.

Box 16. Marketing and the mind: techniques to fine-tune alcohol marketing

Over the past decade, the alcohol marketing industry has made increasing use of sophisticated methods to refine and tailor their marketing messages and approaches. In addition to the rise of behavioural profiling, which enables marketers to stealthily track and profile the “online journey” of young people, advertisers are drawing upon techniques such as ‘neuromarketing’ to design marketing campaigns that maximise brand engagement. Consumer decisions are not exclusively the outcome of rational conscious thought, and advertisers have a long tradition of practices designed to tap into unconscious processes and emotional responses. Neuromarketing, however, constitutes a significant leap into disturbing new territory, providing a powerful tool for manipulating emotional associations, and posing dilemmas for regulatory authorities.

Neuromarketing techniques draw upon brain measurement technologies to provide insights into the emotional or sub-conscious processes and associations that bypass conscious thought, and that often shape preferences and purchasing decisions. These subconscious processes can be measured using a range of bio-sensory tools, such as functional magnetic resonance imaging (fMRI), eye-tracking studies, and electroencephalography (EEG). A growing number of alcohol and food companies have embraced neuromarketing in their digital marketing campaigns, and video games and other new media platforms are deploying this technique to finetune their marketing strategies, embedding messages and associations that are subtle and covert and that evade conscious recognition. As one leading online marketing executive explained, such techniques enable marketers to finely hone their strategies by harnessing the “subtle, subconscious process in which consumers begin to combine the ad’s messages with their own associations, symbols and metaphors to make the brand more personally relevant” (Micu & Plummer 2007).

REGULATING ALCOHOL ADVERTISING AND PROMOTIONS

The promotion of alcohol is an enormously well-funded, ingenious and pervasive aspect of modern life, trying to recruit new generations of drinkers and speaking for pro-drinking attitudes, and heavy alcohol consumption. Self-regulation of alcohol and marketing has been shown to be fragile and largely ineffective.

– World Health Organisation (2004)

Alcohol marketing regulations in Australia³

Unlike tobacco advertising, which is subject to comprehensive and legislated prohibitions, there are no alcohol advertising bans in Australia. The only aspect of alcohol advertising that is currently regulated by the Government is the times that such advertising can be broadcast on television.⁴

Voluntary regulations apply to other dimensions of alcohol advertising, and these take the form of Industry Codes of Practice that guide the content and, to a limited extent, the placement of advertisements. In addition, alcohol-specific advertising is subject to the Alcohol Beverages Advertising Code (ABAC). This Code is administered by the alcohol industry and applies to members of the Brewers Association of Australia and New Zealand, the Distilled Spirits Industry Council of Australia and the Winemakers' Federation of Australia. In addition to the ABAC, which covers the content of alcohol advertising in various media, there are a number of media industry codes which alcohol advertising must comply with, or which have specific alcohol advertising provisions, including:

- the generic Code of Practice that is administered by the Advertising Standards Bureau (ASB);
- the Australian Association of National Advertisers (AANA) Code of Ethics;
- the Outdoor Media Association Code of Ethics, which includes provisions about Billboard Advertising;
- the Australian Television and Radio Association (ASTRA) Code of Practice; and,
- the Commercial Radio Code of Practice.

³ The system of regulating alcohol advertising in Australia is most commonly referred to as 'self-regulation', although industry bodies prefer the term 'quasi-regulation'. The Final Report of the Victorian Parliament's *Inquiry into Strategies to Reduce Harmful Alcohol Consumption* discusses both terms at length and finds that 'self-regulation' is in sufficiently common usage to be an accepted reference for the current system. Evidence put to the Inquiry defined quasi-regulation as 'the range of rules, instruments and standards whereby government influences businesses to comply, but which do not form part of explicit regulation. On a spectrum of regulation, quasi-regulation lies between self-regulation where industry individuals, companies or groups formulate and enforce their own rules and formal legislation or 'black letter law' where government formulates and enforces legislation' (DCPC 2006 p.400).

⁴ As discussed in the preceding discussion of broadcast media, these scheduling regulations (which are part of the Commercial Television Industry Code of Practice) are limited in scope and effect, and are ultimately flawed in two key respects. Firstly, they permit alcohol advertising during times at which children and young people are known to comprise a significant proportion of the audience. Although such advertising is meant to be limited to mature and adult-viewing classification periods, exemptions enable advertising to occur during sporting broadcasts on weekends and public holidays. Current regulations do not cover product placement, nor brand exposure through sponsorship, such as the conspicuous display of logos when sporting events are broadcast or referred to during news and current affairs programming. A second limitation of the existing regulations is that current provisions do not encompass all broadcast media. Advertising on subscription television and radio falls under a different Code that is governed by the Australian Television and Radio Association (ASTRA) Code of Practice. This Code stipulates that all advertisements on subscription television or radio must comply with the ABAC (ASTRA 2007). However, in relation to the scheduling of advertising, the ASTRA Code of Practice imposes no restrictions on the placement of alcohol advertising. This is premised on the assumption that subscribers will use disabling devices to block out channels or certain levels of classified material to prevent children viewing inappropriate material (thereby blocking the advertising that might accompany adult programs). Scheduling decisions are therefore left to the discretion of each licensee, who is merely advised to "take into account the intellectual and emotional maturity of its intended audience when scheduling [alcohol] advertisements".

Underpinning the ABAC is a complaints mechanism, which is in turn overseen by an Adjudication Panel comprising industry representatives, in addition to one government appointee and one member with a professional background related to public health. In addition to the complaints mechanism, the ABAC Scheme Management Committee oversees a pre-vetting service, which alcohol marketers can use to assess whether proposed advertisements conform to the ABAC before they are released publicly. Use of this pre-vetting service is entirely voluntary, and is funded on a users-pays basis.

The stated aim of the ABAC scheme is to ensure that alcohol advertising presents a responsible approach to drinking, and does not appeal to children or adolescents. In summary, this code requires that alcohol advertisers:

- must not encourage excessive alcohol consumption or abuse of alcohol;
- must not encourage under-age drinking;
- must not have a strong or evident appeal to children (there are specific rules relating to the inclusion of children in advertisements);
- must not suggest that alcohol can contribute to personal, business, social, sporting, sexual or other success;
- must not depict alcohol consumption in relation to the operation of machinery or vehicles;
- must not challenge or dare people to consume alcohol;
- must not promote a beverage on the basis of its higher alcohol content; and,
- must not encourage consumption that is in excess of the NHMRC Australian Alcohol Guidelines.

The ABAC scheme is voluntary, and is funded and administered entirely by the alcohol industry. Commonwealth and State and Territory governments are involved through one representative on the ABAC Management Committee.

Box 17. Corporate social responsibility: A means of forestalling tighter regulations?

As the clamour to impose tighter regulations on alcohol marketing grows in a number of countries, there has been a rise in the number of alcohol industry-funded 'policy' groups which have the professed aim of supporting 'responsible drinking' policies and programs. This includes the Portman Group (UK), STIVA (Netherlands), Entreprise et Prévention (France), the European Forum for Responsible Drinking (Europe), and the International Centre for Alcohol Polices (US). DrinkWise is the Australian incarnation of what the alcohol industry itself has dubbed "social aspect organisations".

Although these industry-funded organisations ostensibly champion public health goals, the policies they advocate are interventions that have been found to have little effect on alcohol misuse or alcohol-related problems. In place of comprehensive strategies that would include regulating marketing and introducing taxation or pricing reforms, industry organisations favour interventions that are unlikely to hurt sales and profits, namely school-based education and one-off mass media campaigns about 'responsible drinking', and the 'self-regulation' of alcohol advertising and promotion (Anderson 2009; Mosher 2012; Matzopolous et al. 2012; Gilmore et al. 2011; Babor et al. 2010).

A number of Australian studies have explored how industry-funded policy organisations legitimise and support the commercial interests of the alcohol industry (Miller et al. 2011; Carah & van Horan 2011). Throughout their media communications and campaigns, the DrinkWise organisation affirm its commitment to addressing Australia's "drinking culture", but frames the problem - and its solution - in terms of individual and parental responsibility. In one study, the links between the DrinkWise organisation and the alcohol industry were

examined through a detailed analysis of the policy discourse surrounding the National Preventative Health Taskforce, which recommended tighter regulations and tax measures to curb alcohol misuse (Miller et al. 2011). Of the numerous submissions made to the Taskforce, all of those that mentioned DrinkWise were submitted by the alcohol industry or its affiliates. Within these submissions, the activities of DrinkWise were consistently invoked to highlight the alcohol industry's commitment to social responsibility, thereby positioning the industry as a legitimate and responsible player in alcohol policy and regulation. In this way, DrinkWise serves the purpose of deflecting criticisms of the alcohol industry, justifying the maintenance of the current self-regulatory framework, and negating the substantive policy reforms recommended by the Preventative Health Taskforce.

The tactics employed by alcohol industry groups closely mirror those employed by the tobacco industry (Bond et al. 2010, 2009). In both instances, industry-funded advocacy groups have attempted to overcome the lack of evidence for the efficacy of their preferred policies by discrediting the effectiveness of the policies of which they disapprove, while producing apparently authoritative but biased reviews in favour of the policies they advocate. For example, in the 1990s, the Portman Group in the UK attempted to covertly commission critical reviews of the WHO report on alcohol policy from academics it assumed would be hostile to the report (Hall & Room 2006). Within Australia, industry attempts to shape the research agenda around alcohol have prompted a coalition of public health advocates to publicly declare they will not seek or accept funding from the DrinkWise organisation (Miller et al. 2009).

Alcohol industry groups have also followed the tobacco industry in funding education campaigns targeted at young people. However, as the WHO concluded in a paper titled *Tobacco industry and corporate responsibility... an inherent contradiction*, "[t]actically, these programmes serve the purpose of creating the appearance that tobacco companies are proposed solutions for the problems they create. In reality they detract attention from proven, effective solutions – including price and tax increases" (WHO 2003).



Such campaigns further serve as a form of marketing, targeting both consumers and political constituencies. The marketing spin-offs of industry-driven campaigns are illustrated in a study undertaken by EUCAM (2009), which examined a series of educational campaigns targeting young people, and developed by specific alcohol companies, including Heineken and Barcadi. By referencing brand names in campaigns promoting responsible

drinking, brand awareness and brand recognition were ultimately raised among young people. In this way, companies not only acquire the veneer of a 'good corporate citizen', but are also able to further their reach into audiences of underage drinkers. In addition to shaping perceptions among consumers, industry activities showcasing 'corporate social responsibly' serve as a form of upstream or stakeholder marketing, influencing policy-makers and key political constituencies (Fooks et al. 2012; Hawkins et al. 2012; Matzopoulos 2012).

By demonstrating a commitment to addressing alcohol-related harms, the alcohol industry positions itself as a legitimate and integral player in supporting public health objectives, creating a political climate more receptive to their interests.

Thus, while the desire to contain government expenditure on education campaigns through corporate sponsorship is understandable, this needs to be balanced against the costs that arise from alcohol use, and the enhanced profile such tactics provide to alcohol companies. Ultimately, there is an inherent conflict of interest when corporations engage in activities and policies ostensibly aimed towards reducing the harmful behaviours upon which their profitability depends (Gilmore et al. 2011).

The limitations of self-regulation

Despite provisions in the ABAC designed to prevent alcohol advertising to young people, there is extensive and consistent evidence that self-regulation of alcohol advertising has failed to protect young people from inappropriate messages conveyed through alcohol marketing. The ABAC remains a voluntary code with limited scope, limited government representation, no means of enforcing panel decisions, and no penalties for non-compliance.

The weaknesses of this self-regulatory system have been widely documented by a succession of reports and formal reviews. An extensive review commissioned by the Ministerial Council on Drugs Strategy in 2003 concluded that the ABAC system was 'dysfunctional' (NCRAA 2003; Munro 2006). This review found that advertisements routinely violated the ABAC, that many complaints were not investigated, and that, when complaints were investigated, the process was excessively lengthy and decisions were not reported accurately. In response to this critical review, a number of reforms were made to the ABAC scheme. This included extending the code to cover certain internet and new media advertising; improving both the transparency and public awareness of the scheme; and broadening membership of the ABAC adjudication panel to include a public health representative. Despite these changes, a review of the revised ABAC scheme, commissioned by the Department of Health and Ageing, found that significant deficiencies persisted in the ABAC scheme, and that ultimately the code remained ineffective in regulating alcohol advertising (King et al. 2005a, 2005b).

Several persistent criticisms have been made in relation to the current self-regulatory regime. First, a significant proportion of advertisements that breach the code continue to evade current regulations. Extensive and consistent non-compliance with ABAC has been documented across a range of advertising mediums including television, magazines popular with young people, internet and radio (see Table 1). Complaints dismissed by the ABAC adjudication panel have been found to be at odds with the assessments made by independent experts. Empirical research also shows a disparity between young people's perceptions regarding messages contained in alcohol advertisements and the judgements made by the ABAC adjudication panel.

A second weakness of the self-regulatory regime is its dependence on complaints to identify and address breaches of ABAC provisions, and the lack of mechanisms for proactive investigation of potential breaches⁵. The effectiveness of a complaints-based system rests upon widespread awareness of, and willingness to use, complaints processes. Yet studies have shown that only 3 per cent of the adult

⁵ Whilst the current regulatory scheme does include a pre-vetting service, this service is voluntary and operates on a user-pays basis, with costs borne by advertisers. In 2010, the Outdoor Media Association, Free TV Australia, and the Australian Subscription Television and Radio Association announced they would not place advertisements that have not been pre-vetted by the service. Nevertheless, marketing companies can modify advertisements after they have been through the pre-vetting system and, given the outcomes of this process are not binding, it effectively operates to provide copy advice rather than providing a mandatory pre-clearance function.

population are aware of the existing ABAC scheme and know what it relates to, while only 2 per cent of people concerned about specific advertisements had made a formal complaint (Loxley et al. 2005). The limitations of a complaints-based system are compounded for 'below-the-line' advertising techniques which target niche audiences, such as teenagers, and which are largely invisible to the wider public. In an increasingly fragmented media marketplace, young people may be the exclusive audience for certain marketing campaigns, and they may be less inclined to be critical or make formal complaints.

Further limitations in the current system of self-regulation relate to its limited scope. Firstly, adherence to the Code is voluntary, and industry coverage is therefore limited to alcohol companies that are signatories to the Code. Second, not all forms of marketing are covered by the existing Code. Viral marketing, podcasting, embedded and incidental advertising through product placement, alcohol-flavoured junk food, and branded merchandise and competitions are all outside the scope of existing regulations. Critically, alcohol sponsorship of sporting and cultural events is not addressed in the Code.

A further limitation of the existing Code is its singular focus on the content of advertisements. Although the effects of alcohol advertising have been found to be cumulative, the Code does not address the placement or volume of alcohol marketing. In addition, even if the specific provisions within the voluntary code are rigorously adhered to, studies have suggested that focusing on specific messages is unlikely to address the subtle associations or emotional impact of advertising, much of which is communicated by music and is increasingly youth-culture specific (Hill & Casswell 2004). As a recent study of self-regulation in the UK concluded, "the sophisticated communications and subtle emotions such as sociability and masculinity that comprise modern advertising (and sponsorship) often defy intelligent analysis by the regulator, especially when the thinking and strategising that underpins them remains hidden" (Hastings 2009). The upshot is that effective regulations need to reduce the overall volume and placement of marketing – an objective that will not be achieved if the focus remains on content alone.

Finally, the effectiveness of the current self-regulatory regime is ultimately compromised by the lack of powers to enforce regulations and impose sanctions on those who breach the Code. This is illustrated by the Independent Distillers' Group, whose advertising for the Three Kings drinks range has been persistently criticised for encouraging youth drinking and for featuring young people under the age of 25. Although the ABAC Adjudication Panel made four separate ruling against the Three Kings ads, finding them to be in breach of the regulatory Code, no recommendations were made to remove or modify the advertisements. As the advertiser is not a signatory to the ABAC Scheme, the Panel's decisions had no influence, and the advertising campaign continued to run in outdoor media and online. Similarly, the industry regulator responsible for outdoor advertising has consistently failed to act on breaches of the Outdoor Media Association Alcohol Advertising Guidelines. Although regulations prohibit alcohol advertising within 150 metres of a school entrance, the Outdoor Media Association has consistently failed to enforce this regulation when clear breaches have been identified, such as billboard advertising alcohol that appear in full view of school entrances.⁶

In response to the weaknesses inherent in the current regulatory regime, a coalition of public health experts and organisations established an alternative regulatory body in March 2012 (AARB 2012). This body is known as the Alcohol Advertising Review Board (AARB), and has been set up to operate independent of industry, providing impartial assessments of alcohol advertising and determining whether they comply with the current regulatory code. During its first reported period of operation (March – June), the AARB received 63 complaints, which exceeds the number received under the established self-regulatory scheme. Although this new watchdog found a number of instances of alcohol marketing that breached the existing regulatory code, it has no statutory or enforcement powers, and most alcohol companies have refused to remove or revise their offending promotions or advertisements.

⁶ A discussion of these and other case-studies can be found at the website for the Alcohol Advertising Review Board (<http://www.alcoholadreview.com.au/>).

Authors	Advertising medium	Methodology	Findings
Jones et al. 2008	Television	Complaints that were received and dismissed under the ABAC scheme over a 12-month period were assessed by an independent expert panel	The decisions made under the current self-regulatory scheme are not in harmony with the judgements of independent experts
Jones, Gregory & Munro 2009	Print and television	287 young people (aged 15-24) viewed a selection of print and television advertisements for alcohol & asked to complete questionnaire immediately after viewing each advertisement	Young people consistently perceive messages in alcohol advertisements that promote the social benefits of drinking alcohol
Barrie, Jones & Phillipson 2009	Free-to-air television	Frequency and content analysis of advertising during two popular AFL sports final series	Alcohol advertising during sporting broadcasts is prevalent and contains content that is: (i) known to appeal to children (who are part of the viewing audience); and (ii) associates alcohol consumption with social and sporting success
Roberts 2002	Print media, internet	Observational study of websites, transit advertising and magazine ads	Alcohol advertisements frequently associate alcohol products with sexual, social & sporting success, thereby contravening the ABAC
Jones & Donovan 2001	Radio	Two convenience samples of young people (aged 15-16 and 19-21 years) were exposed to one of three ads. Respondents completed a post-exposure questionnaire based on standard advertising copy testing procedures.	Young people felt that alcohol advertisement suggested that the consumption of alcohol beverages: (i) contributes to social and sexual success; and (ii) contributes to a significant change in mood (stress reduction/relaxation).
Donovan et al. 2007	Magazines	Content analysis of alcohol ads & promotions from 93 magazines popular with young people, using coding frame based on ABAC requirements	Alcohol advertisements appeared in two thirds of the magazines surveyed, with over half (52%) of these ads contravening at least one section of the ABAC
King, Taylor & Carroll 2005a	Free-to-air television	Combined media research data & Target Audience Rating Points to estimate youth exposure to alcohol advertising via metropolitan free-to-air TV in Sydney & Melbourne	Several advertisements for alcoholic beverages screened on television were found to be more likely to reach 13- to 17-year-olds than adults, and overall exposure among 13-17 year olds was only slightly less than among 18-29 year old (90%)
King, Taylor & Carroll 2005b	Print & broadcast media, internet	Survey of 1000 Australians aged 18 and older	Less than half of all survey respondents felt the alcohol advertisements they viewed in the preceding 12 months complied with the alcohol advertising Code, with 69% agreeing that alcohol advertisements encourage underage drinking
Winter, Donovan & Fielder 2008	Television	Exposure levels to alcohol advertisements over a twelve-month period were calculated for children (0-12) & teenagers (13-17 years), using weekly audience measurement and scheduling data	Underage drinkers (13-17) are being exposed to alcohol advertising at approximately the same levels as 18-24 year olds; children aged under 12 were exposed to around half the number of ads viewed by 18-24 year olds

Authors	Advertising medium	Methodology	Findings
Jones & Gregory 2007	Print, television	Convenience sample of 287 young people (15-24 years) were shown advertisements from print and television and asked to assess what messages were conveyed in each advertisement	The majority of adolescents (90%) believed alcohol ads created an impression that alcohol causes or contributes to personal, social, sporting, business, sexual or other success, and that such ads therefore contravene the ABAC
Ouschan, Fielder & Donovan 2010	Free-to-air television	Exposure data used to determine 25 ads most frequently viewed by teenagers (13-17); responses of 644 adolescents who viewed these ads were analysed to determine elements appealing to 13-17 year olds, & whether these elements impacted on intentions to try the alcohol brand	Elements that appealed to underage drinkers (13-17 years) appeared in the television advertisements most frequently viewed by young people; these advertisements contributed to the desire of underage drinkers to consume the alcohol brands that featured in advertisements
Carter, Phan & Donovan 2010	Television	Several interview surveys (using different age samples of children, adolescents and adults) to assess the recognition of and responses to Bundy Bear and associated advertising for Bundaberg Rum, and to determine whether such advertising appeals to children.	The Bundy Bear character has evident if not strong appeal to children and adolescents. Three quarters of children & adolescents recognised the Bundy Bear character & associated it with Bunderberg Rum, & over 90% attributed favourable characteristics to it; 77% of adults said ads appealed to children or adolescents. These findings challenge the ABAC ruling that the polar bear used in Bundaberg Rum advertising does not appeal to children and adolescents.
Pettigrew, Roberts, Pescud, Chapman, Qvester & Miller 2012	Free-to-air television	Content analysis of 2810 alcohol ads, aired over a 2 month period, were coded according to themes employed and time of exposure. Audience exposure to advertising was estimated using advertising placement expenditure, scheduling data and audience measurement data.	Children and young people are regularly exposure to ads depicting alcohol consumption as fun, social and inexpensive. Alcohol represented one in 10 beverage advertisements, and around half of all alcohol ads appeared during children's popular viewing times.
Jones & Magee 2011	Television, Internet, billboard, point-of-sale, newspapers, magazine, promotional material.	A cross-sectional survey of 1113 adolescents aged 12-17 years; participants answered a series of questions assessing exposure to alcohol advertising across eight media (including television, Internet & point-of-sale). Alcohol consumption was assessed using three questions (initiation, recent consumption & frequency of consumption in the previous 12 months).	The majority indicated that they had been exposed to alcohol ads on television, in newspapers & magazines, on the Internet, on billboards/posters & promotional materials & in bottleshops, bars and pubs.

International perspectives on self-regulation

International studies have found no evidence for the effectiveness of self-regulation of alcohol marketing. Comparative analyses of regulatory frameworks in overseas jurisdictions consistently demonstrate that self-regulation does not prevent alcohol advertising reaching young people (de Bruijn et al. 2010; Anderson 2007; de Bruijn et al. 2012; Saffer 1991; Saffer & Dave 2002; Babor et al. 2010). A recent systematic review assessed the literature examining the effectiveness of self-regulation of alcohol advertising in Europe, Australia, the United States, and South America. This review concluded that “industry self-regulation of alcohol advertising does not show evidence of efficacy” (Vendrame & Pinsky 2011).

Based on the recognised limitations of self-regulation, and given the gravity of the social and health problems posed by risky drinking behaviours, the most recent draft of the European Action Plan on Alcohol by the World Health Organisation recommends installing a total ban on alcohol advertising.

The case for regulatory reform

If self-regulation is failing to address the routine exposure of young people to alcohol marketing – both in Australia and overseas – what then, does work, and what options should policymakers be considering?

In response to these questions, a number of public health researchers, along with agencies such as the WHO, have recommended the adoption of statutory regulations⁷. Statutory regulations are codified in law, and therefore provide a supporting legislative backdrop to support the enforcement of restrictions. Based on their systematic review of the literature, Vendrame and Pinsky (2011) state that, when adopted in conjunction with a comprehensive strategy addressing alcohol consumption, statutory regulations are the most effective policy measure in reducing the exposure of young people to advertising (see also Booth et al. 2008).

According to the Australian Government’s guidelines for best-practice regulation, alcohol marketing would appear to meet several criteria that make statutory regulation necessary (Australian Government 2007). According to these guidelines, explicit government regulation is appropriate in instances where there are systematic compliance problems or repeated breaches of regulations; in circumstances where effective sanctions are not in place; and where existing industry bodies lack adequate coverage of industry participants. Perhaps most importantly, these guidelines state that statutory regulations should be in place for activities that have “high risk” or “high impact/significance, for example, a major public health and safety issue” (2007:106). In contrast, self-regulation is appropriate in instances where “there is no strong public interest concern, in particular, no major public health and safety concern” (2007:106).

Alongside a statutory framework, additional components that have been identified as necessary to effective regulation of alcohol marketing include:

- **An independent body that monitors and oversees regulations, and with the powers to formally investigate and penalise breaches of the alcohol marketing regulations.**

Young people constitute a lucrative market for the alcohol industry, and there is an inherent conflict of interest involved when industries engage in activities or policies ostensibly aimed towards reducing the harmful behaviours on which their profitability depends.

⁷ Statutory and self-regulation are not mutually exclusive, and some countries have adopted frameworks that incorporate elements of both. These ‘co-regulatory’ regimes typically involve both industry and government (the regulator) developing, administering and enforcing a solution, with arrangements accompanied by a legislative backstop. Whilst the effectiveness of such regimes is contested, there is an overwhelming consensus that regulations can only be effective when they are operating in a clear legislative framework (De Bruijn et al. 2010). Australia currently lacks any such framework.

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- **Effective deterrence systems, including meaningful sanctions for non-compliance.**

Withdrawal of advertising copy does not in itself constitute a sufficient deterrent, and additional penalties (e.g. financial) are required. The controversy and media storm generated by some provocative or shocking advertisements has ensured that, even once they are banned, ads gain a new lease of life via online video websites such as YouTube. Indeed, the image of a brand attractive to rebellious youth may be reinforced by 'bad publicity'.

- **Coverage of all forms of marketing, with sufficient scope to encompass sponsorship, new media, and indirect marketing, and adequate flexibility to ensure regulations capture new and emerging marketing techniques.**

Historically, regulations have been framed around a narrow understanding of advertising that does not capture the full breadth of marketing tools and techniques. Although alcohol beverages continue to be promoted through paid advertisements in mass media, regulations need to encompass the multiple techniques and tools that create brand exposure, including product naming and design, events sponsorship, interactive or viral campaigns, product placement and other new and emerging forms of marketing.

- **Clear and unambiguous regulations that address the volume as well as the content of alcohol marketing.**

Volume restrictions address the quantity or location of alcohol advertisements and promotions⁸, and therefore protect against the cumulative effect of marketing that reaches young people through multiple channels (EUCAM 2011; Gordon et al. 2011). This is critical, as the ubiquitous presence of alcohol marketing has a cumulative effect, not only on the target audience, but also on others who are coincidentally exposed to the ads (Roche 2008:152).

Regulatory codes that address content alone can be difficult to enforce, and do not necessarily reduce the sheer volume and repetition of alcohol marketing. Marketing often deploys subtle emotional associations and implicit cues that may appeal to young people, but which do not expressly transgress codes (Hastings 2009). Because it can be difficult to specify within a code everything that may be appealing to young people, some countries (e.g. France) have chosen to specify what it can include, since that is much clearer to monitor and enforce (see Box 18). Alternatively, a number of public health academics and agencies have recommended adopting volume restrictions, which can be easier to enforce.

⁸ Volume restrictions can take various forms, including prohibiting the marketing of certain products (e.g. spirits or alcopops), media restrictions (e.g. no print advertising), time-period restrictions (e.g. no television advertising between 6 am and 9 pm), location (e.g. no billboards within 100 metres of schools), as well as target group restrictions (e.g. no alcohol advertising when more than 25% of the audience are expected to be under 18 years of age). Internationally, Norway has the most comprehensive volume restrictions, banning all forms of alcohol marketing.

Box 18. The 'Loi Evin': a French exception

A number of overseas jurisdictions have introduced statutory regulations to restrict the volume and/or content of alcohol marketing. The Dutch Institute for Alcohol Policy (STAP) has assessed the effectiveness of alcohol marketing regulations in 23 European countries, and has found that the statutory regulations in France and Norway are the most effective (de Bruijn et al. 2010).

The alcohol policy law, the 'Loi Evin', was passed in France in 1991 in order to control the advertising of alcohol and tobacco. This 'code de sante publique' (code for public health) stipulates what can be displayed and allows only objective product information: "The authorised advertising for alcohol beverages is limited to the indication of the degree of alcohol by volume, origin and name of the product, name and address of manufacturer, agents and custodians and the method of production, terms of sale and consumption mode of the product". This means that not all alcohol advertisements are banned. However, to be permitted, advertisements cannot attribute qualities to alcohol which it does not in fact possess. The statutory code covers all forms of advertising, including packaging and sponsorship. All regulations are overviewed and evaluated by the Court of Justice, and violations of the codes can be punished by financial sanctions.

According to the French National Association of Prevention on Alcohol and Addiction, the Loi Evin is unambiguous, easy to apply, and requires limited resources to implement (Johansen 2009; Rigaud & Craplet 2004). Online alcohol marketing does present some challenges, however the Loi Evin has been extended to apply to new media platforms and, following a ruling against the beer brewery Heineken, Microsoft AdCenter has removed all alcohol businesses from its client list in France.

Despite repeated objections from the alcohol industry, the Loi Évin has withstood robust legal challenges. In 2004 Bacardi took Loi Evin to the European Court – and lost. The European Court found that the protection of consumers' health should prevail over the freedom of the provision of services, and that the legislation is appropriate to achieve the objective of protecting public health. Alcohol consumption has declined in France since the introduction of the Loi Evin, however alcohol consumption had been tracking downwards prior to this time, and the ultimate effect of the Loi Evin is difficult to disentangle from other factors. Supporters of the law in France maintain it has been an essential element in a range of measures to curb alcohol misuse, that its qualitative and symbolic effects have been profound, and that it is integral to an overall public health strategy addressing alcohol consumption (Rigaud & Craplet 2004).

Whilst the regulations in France place strict parameters around what content is permitted in alcohol marketing, Norway has adopted stringent volume restrictions on the promotion and advertising of alcohol. Specifically, Norway has imposed a complete ban on all alcohol advertisements.

The cost benefits of reducing alcohol marketing

A comprehensive global assessment of the effectiveness and cost-effectiveness of policies to reduce alcohol-related harms found that banning alcohol advertising was among the three most cost-effective strategies for reducing harm (Anderson et al. 2009). This finding has been supported by the WHO and a number of cross-jurisdictional reports evaluating the effectiveness of alcohol policy options (WHO 2009a; WHO 2007; Anderson & Baumberg 2006). However, comparative analyses of policy interventions consistently show that, for the potential benefits of marketing restrictions to be realised, regulatory measures must be enforced and backed up with legislation.

The cost effectiveness of marketing restrictions has been further reinforced by modelling that factors in local conditions and health settings in Australia (Doran et al. 2008; Vos et al. 2010; Cobiac et al. 2009; RACP 2005). A rigorous evaluation of different policy interventions indicated that an advertising ban on alcohol would not only improve health outcomes and provide a significant return on investment, but that it would also achieve net cost savings, resulting in direct economic returns to government (Vos et al. 2010). A similar conclusion was reached by Doran et al. (2008), who tailored the WHO's generalised cost-effectiveness framework to accommodate the Australian context. This approach uses sophisticated modelling, comparing the net costs that would stem from the introduction of a new intervention with the net costs that would arise in the absence of any intervention. On the basis of this analysis, Doran et al. conclude, "banning of alcohol advertising should be a high priority for investment due to the high probability of cost-savings". Along with changes to the volumetric pricing of alcohol, comprehensive restrictions on alcohol advertising represent the most cost-effective strategy for reducing harms associated with alcohol misuse (Doran et al. 2008:5-6). And, as international analyses have suggested, the ultimate effectiveness of this policy measure would be amplified if used in conjunction with other approaches.

Regulating online alcohol marketing

Within Australia, regulations for advertising have failed to keep pace with the swift growth of digital media and rapid innovations in online and mobile marketing techniques. This is despite a renewed focus on the converging media and communications landscape and its implications for other aspects of media and communications policy.

The rapid expansion in digital marketing poses four key challenges to the existing self-regulatory regime. Firstly, current regulations rest on a narrow understanding of 'advertising', which is understood as a discrete commercial communication, paid for by a sponsor and able to be distinguished from non-commercial content. However, in online and mobile marketing, the boundaries between advertising and other content is increasingly difficult to discern. In contrast to the traditional mode of television advertising, with stand-alone ads appearing in the 'commercial breaks', much digital marketing is incorporated into the very fabric of online conversations and entertainment. Commercial content can be said to "no longer interrupt programming; rather, marketing strategies are routinely woven into entertainment, gaming and everyday social relationships, and are often purposefully disguised" (Montgomery & Chester 2009:S23). Surreptitious or 'stealth' marketing techniques mask the true relationship with the company producing or sponsoring the marketing message. It is the covert nature of such marketing that makes it both persuasive and difficult to monitor and regulate.

A second regulatory challenge stems from the highly targeted and customised marketing enabled by digital technologies. The wealth of information generated by tracking online and mobile interactions allows alcohol marketers to tailor and target their efforts to very selective and defined portions of young people – many of whom may be unaware of, or unwilling to, utilise the complaints mechanisms upon which the current regulatory regime is based. Moreover, given the narrow audience segment that are reached through such marketing, it tends to be invisible to the wider community, evading the scrutiny of regulatory bodies.

A third regulatory challenge relates to the growth of user-generated content. In the new media environment, young people can readily create or distribute promotional content through online conversations, social media profiles, video-sharing, blogs, online forums, or instant messaging. Companies can harness this user-generated content to achieve specific marketing objectives, initiating campaigns that spread virally through social media networks, or enlisting young people to “co-create” product packaging or commercials. In such instances, the interactive dimension of digital technologies effectively blurs the line between user-generated content and corporate marketing, subverting the assumption that advertising is one-way and issued from a clearly identifiable commercial source.

Finally, existing advertising regulations have failed to address the global nature of online communications. At the same time that alcohol industry ownership has been consolidated into the hands of a few global corporations, digital communications have facilitated the dissemination of marketing messages that cross national boundaries (Babor et al. 2010). Existing regulations, however, are ill-equipped to deal with the global nature of contemporary communications and alcohol marketing.

In short, advertising regulations in Australia have failed to keep pace with the rapid expansion of online and mobile communications. Efforts to address the proliferation of digital marketing have involved ad hoc adjustments to the existing Industry Code.⁹ In 2004, a critical review of alcohol advertising regulations prompted a revision of the ABAC guidelines, including an additional clause relating to Internet advertising:

The required standards for advertisements... applies to internet sites primarily intended for advertising developed by or for producers or importers of alcohol products available in Australia or that are reasonably expected to be made available in Australia, and to banner advertising of such products on third party sites.

(ABAC 2011:3)

This amendment, however, excludes most forms of online and mobile marketing, and has been limited in scope and effect. It ultimately rests on a narrow understanding of ‘advertising’ that fails to capture the full breadth and complexity of contemporary marketing techniques. Accordingly, alcohol marketing continues to permeate the online interactions and activities of young people in Australia, through social media, embedded commercial content, advergames, product placement, viral marketing, and other marketing methods that lie outside ABAC’s current remit.

The current scheme not only overlooks the variety of marketing platforms and methods, but also neglects the cumulative and synergistic effects of different marketing activities. The current regulatory code applies to individual instances of advertising, focusing on the explicit meanings and messages conveyed through a single advertisement. Yet in contemporary marketing, particular marketing activities rarely operate in isolation, or as discrete or stand-alone ads. Marketing campaigns typically comprise a carefully configured mix of methods and activities, including implicit branding and promotional activities that may be dispersed across a range of media and settings. It is the mutually reinforcing and cumulative impact of these multiple marketing activities – and not simply the effect of a single advertisement – that underpins successful brands.

⁹ The emergence of digital marketing has not altered the prevailing self-regulatory approach to advertising in Australia, which remains the responsibility of industry. The exception to this is tobacco advertising, which was prohibited in online and mobile communication mediums under legislation passed in 2011.

In 2010, the limitations of the existing regulatory scheme were acknowledged by ABAC's chief adjudicator, Michael Lavarch, who conceded that the growth in digital marketing posed fundamental challenges:

The ABAC Scheme was introduced in 1998 based upon a model of an execution of an individual alcohol advertisement being broadcast on television, radio or cinema, or being published in a newspaper or magazine. While the scheme was extended to the internet in 2004, it is apparent that the expansion in marketing and advertising options opened by new media is testing the capacity of regulatory schemes... For the ABAC adjudication processes, these developments and their use by alcohol companies raise obvious challenges. In part, these go to assessing whether a particular promotional activity is in fact "advertising" for ABAC purposes. If the activity does fall within the scope of the ABAC Scheme, then the highly dynamic nature of the medium can make even basic requirements, such as locating the actual images and text which have drawn a complaint, quite problematic.

(ABAC 2010:6)

Lavarch went on to advocate for a review of the regulatory scheme in light of more recent and emerging forms of digital marketing. His calls for a review were echoed more recently by the ABAC adjudication panel, following a high-profile ruling that found that user-generated comments made on Facebook constituted advertising (see Box 19).

The discrepancies between current regulations and the realities of contemporary marketing stem from regulatory models and assumptions based around traditional media. Historically, advertising regulations have been framed around a model of communication that is contained within national borders, mass-mediated, one-way and delivered through distinct mediums or 'platforms' (for example, broadcast television, billboard advertising, or newspapers). The need to rethink this model of communication and the policy and regulations that are based upon it prompted the 'Convergence Review,' which was commissioned by the Australian Government in 2011. Despite the wide-ranging nature of this review, the implications of the new communications landscape for marketing are neglected in the Review's Final Report (Australian Government 2012). Although the Final Report considers options for regulating sexually explicit or violent online content, the implications of marketing alcohol or other potentially harmful products is overlooked and left to existing self-regulatory schemes.¹⁰

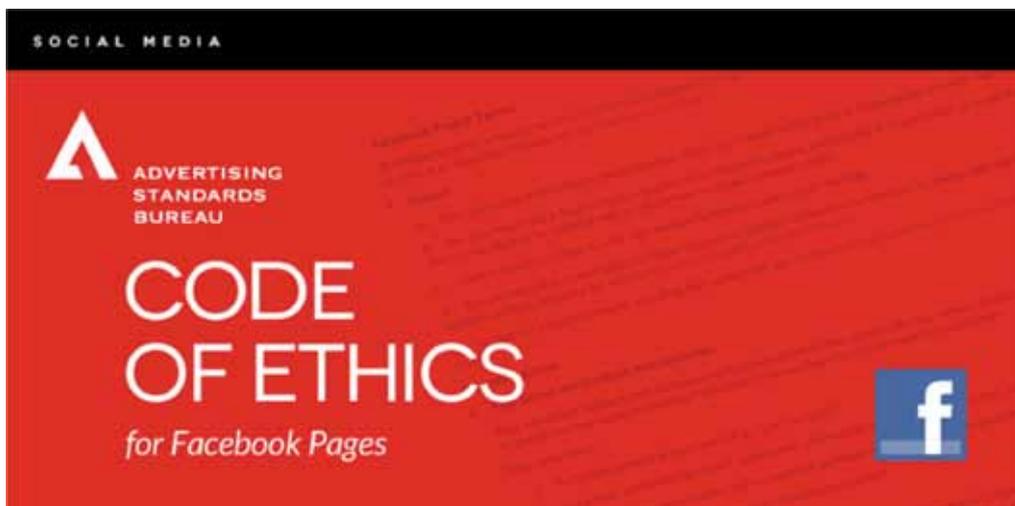
The Convergence Review Report further recommends that, where regulation is necessary, it should explicitly exclude social media, video-sharing websites, and user-generated content. Social media and user-generated content sites should instead be encouraged to adopt self-regulatory practices. In the case of alcohol marketing, however, such an approach has proven inadequate. Most official alcohol brand websites have age verification measures in place, and some social networking sites are also adopting age verification measures to exclude underage users from accessing official alcohol brand pages. Facebook, for example, requires alcohol companies to provide advertising that conforms to individual territory regulations (Facebook 2010). Yet these age verification prompts are tokenistic, easy to circumvent, and unable to capture 'unofficial' website or social media pages. A recent UK study, for example, found that only 0.5 per cent of social networking pages devoted to alcohol brands were clearly identified as official (Atkinson et al. 2011). These unofficial pages were created by third parties, including young people, and were replete with advertisements and pages depicting product images, logos, and links to official brand sites. Moreover, given the variety of online marketing methods, existing age verification mechanisms are not only inadequate but increasingly irrelevant. Marketing is not cordoned off in a special category of advertising, but woven into the very fabric of online interactions and content.

¹⁰ Although the implications of digital marketing are largely neglected within the Final Report of the Convergence Review (the blurring of the boundaries between content and advertising is given cursory acknowledgement, but no further examination or specific recommendations are elaborated with respect to this), the Report does recommend "reviewing the restrictions for advertising during C-rated programming (directed at children aged 5 to 14) to expand the opportunity for broadcasters to generate revenue during this programming" (Australian Government 2012:55). If implemented, this measure would enable alcohol advertising to be broadcast during programs specifically for children. The report also recommends removing the requirement for pre-approval of scripts for children's programs, a move that could potentially offset efforts to limit product placement in such programming.

Thus, despite the recent focus on regulatory reform, the health implications of online and mobile commercial communications continues to be neglected within Australia, both from policymakers and within wider public and community discussions. As governments in Europe, the UK and US commission reviews and debate the regulatory implications of the online marketing of alcohol and other harmful products, the ever-expanding growth of digital marketing to children and young people in Australia continues unchecked, evading regulators and escaping the scrutiny of policymakers.

Although new media present numerous challenges, the extent and impact of digital marketing make regulatory reform a policy imperative. Since its inception, the self-regulatory scheme for alcohol marketing has been subject to ongoing criticism; the dramatic explosion of online and mobile marketing has provided added urgency and momentum to policy reform efforts. Ultimately, however, changes to the local regulatory system need to be backed up by cooperative efforts at a regional and international level. The marketing of alcohol is a global industry that transcends national borders. And, given the public health burden associated with alcohol, there is a clear mandate for global cooperation in controlling and regulating alcohol marketing. While efforts to regulate alcohol have been focused at a national or regional level, there is precedence for global approaches that regulate the marketing of products that pose a risk to public health. The World Health Organisation has provided a forum for pursuing such cooperative efforts, and in recent years there have been increasing calls for an international convention on alcohol and health, similar to the Framework Convention on Tobacco Control (Casswell 2012; Labonte et al. 2011; Sridhar 2012; Grieshaber-Otto et al. 2006; Baumberg 2010; Casswell & Maxwell 2005; Editorial 2009; Jernigan et al. 2000). Greater intergovernmental cooperation and cross-border marketing standards need to be pursued as part of a comprehensive approach to regulate the scope and nature of digital marketing and to limit the adverse impacts such marketing can have on vulnerable populations, including children.

Box 19. Facebook and alcohol brands: recent cases that challenge the use of social media by alcohol brands



Although alcohol companies have taken advantage of the promotional benefits of social media, Facebook and other social networking sites have traditionally fallen outside the remit of Australia's advertising regulations. However, a recent decision by the Australian Advertising Board (ASB) has challenged this narrow understanding of advertising.

In August 2012, the ASB handed down a finding that social media does in fact constitute an advertising tool. This ruling was in response to complaints against the Facebook pages of two alcohol brands, Smirnoff and Victoria Bitter (VB). Like the social media pages of many alcohol brands, the Facebook pages of VB and Smirnoff are replete with promotional messages and images – all of which can be disseminated in the peer networks of Facebook via tags, likes and comments. In the complaint made against Smirnoff, it was observed that Smirnoff had uploaded more than 2,700 images to its Facebook page, mainly depicting young people (under the age of 25) enjoying alcohol in nightclubs, musical festivals, and social gatherings. In the complaint made against the Facebook page of VB, a number of instances were identified in which VB posts and promptings instigated user-generated content that contravened the ABAC Code. VB posts such as *"it's nearly 5pm – time to crack the weekend's first VB"* elicited user comments such as *"what's this 5pm crap, cracked my first one hours ago"*, *"F..K THAT, I cracked my first 4 hours ago"*, *"on the 8th already"*, and so on. In another example, VB posed a question about the essential elements of an Australian day BBQ. In response, users of the VB page posted a range of comments and images that are not allowable under the ABAC Code, including references to excessive drinking, and comments that linked the consumption of VB with illicit drug use, strippers, sexual conquest, and racial tension.

In its response to the complaints against the Smirnoff and VB Facebook pages, the regulatory panel acknowledges that social media raises a “fundamental threshold issue”, posing substantive and procedural issues that were not envisaged when the alcohol advertising code was established. The Panel notes that “the Scheme was designed to create a Code of Practice to govern the dominant form of alcohol marketing of the period, namely advertising via ‘traditional’ mediums of TV, radio, print and outdoor sites, such as billboards” (ABAC Determination 58/12, 2012). Although the advent of digital media and branding challenges this original framing of the Code, the regulator nevertheless reaffirms the distinction between marketing and advertising, noting that ABAC exclusively applies to advertising (which is deemed “a particular type of marketing”). The regulatory panel conclude that the Facebook pages of brands are “advertising” for the purposes of the ABAC scheme, and that this includes content created by the brand and by users or friends of the page:

The Board considered that the Facebook site of an advertiser is a marketing communication tool over which the advertiser has a reasonable degree of control and that the site could be considered to draw the attention of a segment of the public to a product in a manner calculated to promote or oppose directly or indirectly that product. The Board determined that the provisions of the Code apply to an advertiser’s Facebook page. As a Facebook page can be used to engage with customers, the Board further considered that the Code applies to the content generated by the page creator as well as material or comments posted by users or friends. The Board noted that on [the VB] Facebook page, the user comments identified in the complaint were posted in reply to questions posed by the advertiser.

The ASB’s decision has sent ripples through the marketing industry, and the regulatory and legal implications remain unclear. At the time of writing, the ASB has not issued specific guidelines on social media policy, however the Australia Competition and Consumer Commission (ACCC) have indicated that businesses would need to ensure that their Facebook pages are fully compliant with advertising codes within a reasonable timeframe, with larger businesses removing any inappropriate content within 24 hours. This approach is consistent with an earlier ruling by the Federal Court of Australia, which found that a company was liable for postings of third parties in social media (*Australian Competition ad Consumer Commission v Allergy Pathway Pty Ltd*, 2011). In this case, the respondent was determined to be liable because it had control over its social media pages, knew that misleading testimonials had been posted on Facebook and Twitter, and took no steps to remove them. The Federal Court ruled that misleading or deceptive content should be removed within “a reasonable timeframe”.

Despite the recent extension of ABAC to social media, these recent cases expose a number of gaps and unresolved ambiguities in current advertising regulations, highlighting the need for more rigorous and responsive approaches. Critically, from a regulatory perspective, the recent cases underscore the problems of regulations that hinge on a narrow definition of ‘advertising’, and exclude a range of promotional methods and branding strategies. As the ABAC panel itself conceded in the recent Facebook rulings, critical difficulties remain “in applying a Scheme designed for a very different type of advertising to the medium of social media”. The panel recommended that “a holistic review [be undertaken] of the interaction of social media with the ABAC and whether this form of marketing and advertising should be governed within the ABAC Scheme or through some other mechanism”.

POLICY OPTIONS AND RECOMMENDATIONS

The imperative to act is clear. The sheer volume and variety of alcohol marketing reaching young Australians underscores the failures of self-regulation. And, with compelling evidence of an association between alcohol marketing and alcohol consumption, the critical question facing policymakers and those concerned with the welfare of upcoming generations is what needs to be done to tackle this problem.

Reducing alcohol marketing might not immediately solve the problem of young people misusing alcohol, but it will address a powerful driver in the mix of factors shaping alcohol consumption. And, as part of a toolbox of measures designed to tackle the harms associated with alcohol misuse, restricting alcohol marketing has the potential to deliver both positive health outcomes and overall cost savings.

To address the adverse effects of alcohol marketing, a number of measures are recommended:

1. **The regulation of alcohol promotion should be statutory and independent of the alcohol and advertising industries. Experience from within both Australia and overseas demonstrates that self-regulation is not the answer.**
2. **The introduction of meaningful sanctions for serious or persistent non-compliance with marketing regulations. Penalties should be commensurate with the size of the marketing budgets involved and the estimated exposure of children to the offending marketing messages.**
3. **The sponsorship of sport by alcohol companies and brands should be prohibited. Such sponsorship should be phased out, with organisations encouraged and assisted to source socially responsible alternative funding.**
4. **Sponsorship by alcohol companies and brands should be prohibited at youth, cultural and musical events.**
5. **Regulations need to be sufficient in scope to cover all forms of marketing and promotion. Regulations need to be expanded to incorporate point-of-sale promotions, branded merchandise, and new media and digital marketing, including marketing through social media, viral campaigns, and the use of data collection and behavioural profiling. Regulations need to be sufficiently flexible to adapt to new and evolving digital marketing activities.**
6. **The amount spent annually on marketing by leading alcohol companies should be collected and publicly disclosed, including expenditure on social media, online video, mobile campaigns, events sponsorship and product placement**

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7. Given the cumulative effects of marketing, regulations need to limit the amount of alcohol marketing as well as its content.

 8. Continuing research is required that examines the extent and impact of online and digital marketing, and the effectiveness of different regulatory approaches to this form of marketing.

 9. Health promotion education addressing alcohol consumption needs to include a component that builds the critical literacy of young people.

 10. Options to develop a cross-border, international response to alcohol marketing should be pursued. The Framework Convention of Tobacco Control provides an appropriate model for global governance to control alcohol marketing, and examples of possible standard-setting mechanisms including World Health Organisation regulations, ISO standards and Codex Alimentarius Standards.

 11. Preventing the alcohol marketing to young people needs to be part of a comprehensive and multi-faceted strategy addressing alcohol-related harms among young people in Australia.

CONCLUSION

Alcohol marketing has a powerful effect on the drinking patterns of young people. The ongoing transformation of the media and communications landscape has expanded the reach and impact of this marketing, providing an unprecedented opportunity to promote alcohol to children and adolescents. The ongoing transformation of alcohol marketing has serious implications for the health and wellbeing of young people, and requires new thinking and a comprehensive agenda for policy intervention and research.

This report has demonstrated that the self-regulatory framework that has prevailed in Australia is an insufficient response to these challenges. While industry-driven codes have been subject to criticism since their inception, new forms of marketing have further opened the cracks in the self-regulatory regime. Regardless of whether alcohol marketing is specifically targeting young people, the reality is that young people are exposed to such marketing and develop expectations about their likelihood of future drinking based on them. And, with the ever-expanding use of digital marketing, the need to develop more robust and effective regulations on alcohol marketing has acquired added urgency and impetus.

The National Preventative Health Taskforce (2009) stated that a 'unique window of opportunity' presently exists to expand activities related to the prevention of alcohol-related harm. With alcohol companies at the forefront of new digital marketing techniques, it is essential that more effective policy responses are put in place. This report has highlighted the variety and volume of alcohol marketing, reviewed the body of research addressing the effects of this marketing, and examined the strengths and weaknesses of different regulatory responses. Based on this analysis, and given heightened public concerns about drinking among young Australians, the implications for policy-makers are clear and compelling: responsibility for alcohol marketing cannot be left to industry. A swift and rigorous policy response, including regulatory reform, is vital if we are to reduce alcohol marketing to young people in Australia.

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