

## **Exposing children to alcohol marketing is harmful and can result in earlier and heavier use of alcohol, increasing the risk of dependency later in life.**

*By way of follow-on to our submission to the 2019 Department of Communications, Climate Action and Environment's consultation on the views of the public and all stakeholders on how Ireland should introduce legislation for the regulation of harmful online content at a national level (strand 1) and the implementation of the revised AVMSD (Strands 2-4), and the subsequent publication of the the general scheme of the Online Safety and Media Regulation Bill, to protect children online (January 2020), which awaits further consideration and scrutiny – Alcohol Action Ireland wish to provide feedback in advance of stakeholder workshops to follow in the coming months.*

Comprehensive research now clearly tells us that alcohol marketing including advertising, sponsorship and other forms of promotion, increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol.<sup>1</sup>

In short, children, and younger people, navigate a tsunami of alcohol promotion every day that ensures messages about drinking are increasingly normalised. Alcohol is one of the most heavily marketed products on our shelves with a total market value of approximately €7.447 billion in Ireland each year. Young people are an important market for the alcohol industry.<sup>2</sup>

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<sup>1</sup> Scientific Opinion of the Science Group of the European Alcohol and Health Forum (2009) Does marketing communication impact on the volume and patterns of consumption of alcoholic beverages, especially by young people? – a review of the longitudinal studies Anderson; P. et al (2009) Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies. Alcohol and Alcoholism, pp.1-15, 2009; Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies, <https://www.ncbi.nlm.nih.gov/pubmed/19144976>; The effect of alcohol advertising, marketing and portrayal on drinking behaviour in young people: systematic review of prospective cohort studies, <https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471-2458-9-51>.

<sup>2</sup> Gordon R, Moodie C, Eadie D & Hastings G, Assessing the cumulative impact of alcohol marketing on young people's drinking: Cross-sectional data findings; Gordon R, Moodie C, Eadie D & Hastings G (2010) Critical social marketing – The impact of alcohol marketing on youth drinking: Qualitative findings. International Journal of Nonprofit and Voluntary Sector Marketing, 15 (3), pp. 265-275. <https://doi.org/10.1002/nvsm.388>

Ever-evolving research in this field shows that digital marketing models are wired to learn to exploit vulnerabilities and that pervasive social networking technologies contribute to drinking cultures in young people.<sup>3</sup> Given this strong and growing body of evidence, Alcohol Action Ireland contends that young people must be protected from ‘commercial exploitation,’<sup>4</sup> as mooted in the Online Safety & Media Regulation Bill 2019. The Bill proposes an online safety commissioner, which, AAI believes, should have a remit over corporate entities that track, profile and target young people to market harmful and addictive products such as alcohol, gambling and junk food.

Furthermore, although Ireland’s Public Health Alcohol Act does endeavour to restrict alcohol advertising to young people, if we are serious about protecting children, the recently enacted measures must only be considered a first step, as areas such as alcohol sponsorship of sport and culture or adequate controls on exposure to digital promotion are not included in the Act.

The point must also be raised that an anomaly currently exists in that the age of digital consent online for young people in Ireland 16, meaning they can be targeted for advertising and data collection at this age, although they cannot legally buy alcohol until the age of 18. In this respect, alcohol brands can essentially profile and reach young people online though still legally underage to consume or purchase alcohol.

It must be ensured that advertisers of alcohol should not advertise an alcohol product, unless all reasonable steps are taken to ensure that the advertising cannot be viewed by children including:

- age verification controls
- demographic targeting to ensure that the advertisement is not displayed to children
- ensuring the advertisement has been labelled or registered in a way which permits it to be blocked by parental filtering software
- ensuring the advertisement does not invite users to share it with others

This is in line with measures in the Public Health Alcohol Act which protects children from outdoor and TV marketing of alcohol. Why should the online landscape be any different?

Furthermore, in order that we not only catch up with, but that we get ahead of insidious online practices, Ireland should seek to prohibit the collection, use or disclosure of children’s data for the purposes of profiling or targeted marketing.<sup>5</sup>

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<sup>3</sup> Youth Drinking Cultures in a Digital World: Alcohol, Social Media and Cultures of Intoxication; Carah, N. (2017) Algorithmic brands: a decade of brand experiments with mobile and social media, *New Media and Society*, 19(3): 384-400.

<sup>4</sup> See General Scheme of the Online Safety & Media Regulation Bill 2019, p 23.

<sup>5</sup> <http://drinktank.org.au/2019/09/forcing-the-dark-arts-of-digital-alcohol-advertising-into-the-light-of-day/>