Alcohol producers and advertisers subjected over a million children to alcohol marketing during the England games at the world cup in June this year. An investigation into alcohol promotion during the world cup by Alcohol Concern has found that in spite of advertising regulations that aim to protect children from alcohol marketing, millions of children as young as five were exposed to advertisements from some of the leading alcohol brands in the UK, including Carling, Stella Artois, Carlsberg, Fosters and WKD.

Alcohol Concern asked the Advertising Standards Authority (ASA) to investigate the numbers of 4–15-year-olds1 viewing each of the live televised games after submitting a complaint that showing alcohol advertisements during the world cup was irresponsible because of the large number of children watching the football with families and friends. The ASA provided Alcohol Concern with the numbers of children viewing each live game on ITV. All the live broadcasts contained up to four alcohol advertisements; just before the match started, during half time and after the match finished. Although the proportion of children viewing the games was deemed to be within the regulations for alcohol advertising, the number of children exposed to the advertisements was in excess of 1 million in both the England vs. Algeria (1.6m) and England vs. USA games (1.4m). Even non-England games such as Uruguay vs. Netherlands attracted over 800,000 children who viewed advertisements from Stella Artois, Carling and Fosters. Most advertisements were shown between 8pm and 10pm. In all, up to 5.2 million children could have been exposed to alcohol advertising during the world cup coverage on TV alone (see Table 1 overleaf).

**International evidence on the impact of alcohol marketing on children**

The international evidence on the association between children’s exposure to alcohol marketing and increased consumption is now well established. The European Union Alcohol and Health Forum, following a review of 13 longitudinal studies, found overwhelming evidence that, “alcohol marketing increases the likelihood that adolescents will start to use alcohol and drink more if they are already using alcohol”. A study quoted by the British Medical Association (BMA) found that over 90% of 13 year old children surveyed could recognise masked brands such as Carling, Smirnoff or WKD. An Australian study which specifically examined alcohol marketing during sports events, found that “young people have a high awareness of the alcohol sponsors and alcohol brands advertised during these sporting telecasts, and associate these products with sport and with positive personal characteristics and outcomes”.

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1Alcohol Concern asked the ASA how many under-18s viewed the alcohol advertisements shown during the World Cup. The ASA uses BARB data which only measures 5-14-year-olds and 16-24-year-olds.
In the UK the level of harmful drinking among those young people who drink is startling. Between 2002 and 2007 alcohol-related hospital admissions for under-18s in England increased by 32%\(^1\). Over the last seven years in England on average thirty-six children a day were admitted to hospital due to alcohol. In 2006 in Wales, 215 boys and 295 girls under 16 years old were admitted to hospital for alcohol-related conditions\(^2\). Whereas in Scotland in 2009, 1,640 15-19-year-olds were admitted to hospital, with 98% of these being emergency admissions\(^3\).

In an article published in *The Lancet*\(^4\) in June 2009, Anderson, Chisholm & Fuhr noted that “the effects of [alcohol marketing] exposure seem cumulative and, in markets with greater availability of alcohol advertising, young people are likely to continue to increase their drinking as they move into their mid-20s, whereas drinking decreases at an earlier age in people who are less exposed to it.” They go on to conclude that “policies that regulate the environment in which alcohol is marketed are effective in reducing alcohol-related harm”.

The National Institute for Health and Clinical Excellence (NICE) recently quoted international evidence which demonstrated a correlation between children’s exposure to alcohol marketing

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**Table 1 – Total number of 4-15-year-olds viewing alcohol advertisements during World Cup 2010**

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Channel</th>
<th>Alcohol Advert – Product</th>
<th>Tevised Game</th>
<th>Total Audience</th>
<th>Total nos of 4-15-year-olds viewing</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/06/10</td>
<td>18:35</td>
<td>ITV</td>
<td>Bulmers</td>
<td>England v. USA</td>
<td>13.576m</td>
<td>1.448m</td>
</tr>
<tr>
<td>12/06/10</td>
<td>20:20</td>
<td>ITV</td>
<td>Stella Artois</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12/06/10</td>
<td>21:20</td>
<td>ITV</td>
<td>Carling</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18/06/10</td>
<td>20:17</td>
<td>ITV</td>
<td>WKD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18/06/10</td>
<td>20:18</td>
<td>ITV</td>
<td>Stella Artois</td>
<td>England v. Algeria</td>
<td>14.624m</td>
<td>1.651m</td>
</tr>
<tr>
<td>18/06/10</td>
<td>20:27</td>
<td>ITV</td>
<td>Carlsberg</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18/06/10</td>
<td>21:21</td>
<td>ITV</td>
<td>Carling</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22/06/10</td>
<td>16:00</td>
<td>ITV</td>
<td>WKD</td>
<td>France v. South Africa</td>
<td>2.543m</td>
<td>0.141m</td>
</tr>
<tr>
<td>23/06/10</td>
<td>20:20</td>
<td>ITV</td>
<td>Magners</td>
<td>Germany vs. Ghana</td>
<td>5.667m</td>
<td>0.442m</td>
</tr>
<tr>
<td>24/06/10</td>
<td>16:55</td>
<td>ITV</td>
<td>WKD</td>
<td>Slovakia v Italy</td>
<td>2.247m</td>
<td>0.133m</td>
</tr>
<tr>
<td>25/06/10</td>
<td>20:25</td>
<td>ITV</td>
<td>WKD</td>
<td>Chile v Spain</td>
<td>5.530m</td>
<td>0.414m</td>
</tr>
<tr>
<td>25/06/10</td>
<td>20:30</td>
<td>ITV</td>
<td>Stella Artois</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>06/07/10</td>
<td>20:20</td>
<td>ITV</td>
<td>Stella Artois</td>
<td>Uruguay v Netherlands</td>
<td>8.889m</td>
<td>0.802m</td>
</tr>
<tr>
<td>06/07/10</td>
<td>20:30</td>
<td>ITV</td>
<td>Carling</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>06/07/10</td>
<td>21:25</td>
<td>ITV</td>
<td>Fosters</td>
<td>Spain v Netherlands</td>
<td>2.957m</td>
<td>0.346m</td>
</tr>
<tr>
<td>06/07/10</td>
<td>21:25</td>
<td>ITV</td>
<td>Fosters</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>5.244m</strong></td>
<td></td>
</tr>
</tbody>
</table>
and the “onset of drinking among young people and increased consumption among those who already drink”\(^{\text{iii}}\). They recommended a review of the advertising codes to ensure that children’s exposure to alcohol advertising is as low as possible. They also called for the UK Government to assess the costs and benefits of a complete ban on alcohol advertising.

Advertising regulations in the UK

The ASA uses a complicated formula (the 120 index\(^*\)) to assess whether the proportion of children in the audience likely to view a future TV programme would classify that programme as unsuitable to show alcohol advertisements. However, Alcohol Concern has long argued that this is a wholly inadequate regulation which has consistently allowed millions of children to be exposed to alcohol advertisements on TV. A study undertaken by Alcohol Concern in 2007 found that over a million children were exposed to alcohol advertising during an episode of Coronation Street\(^*\).

To compound matters, the formula to determine suitability for non-broadcast media, such as cinema and outdoor advertising, is worked out differently and alcohol advertisements can only be shown if the proportion of children in the audience is less than 25%. Even this formula was insufficient in preventing nine alcohol advertisements to be shown to nearly 1.4 million children during the *Batman Returns* film (certificate 15) across cinemas in 2008\(^*\). A further weakness in the regulatory system is that calculating the total number of under-18s viewing television or cinema alcohol advertisements is not possible and only 5-14 year olds and 16-24 year olds are measured.

Alcohol Concern believes that the current regulations covering alcohol advertising are insufficient to protect children from exposure to alcohol marketing and that a new approach is needed. The French Loi Évin has been in place since 1991 and is the name for the set of regulations governing alcohol advertising in France. Although France’s ongoing reduction in alcohol consumption over the last decades cannot solely be attributed to much tighter advertising regulations, the set of laws governing alcohol advertising provide a useful lesson in how to effectively restrict producers from exposing their brands to a younger audience. The precise rules of the Loi Évin can be seen in Table 2.

### Table 2 – The French Loi Évin: Rules governing alcohol advertising across all media

- No advertising is allowed on television or in cinemas
- No sponsorship of cultural or sport events is permitted
- Advertising is permitted only in the press for adults, on billboards, on radio channels (under precise conditions), at special events or places such as wine fairs, wine museums. When advertising is permitted, its content is controlled;
- Messages and images should refer only to the qualities of the products such as ABV, origin, composition, means of production, patterns of consumption;
- A health message must be included on each advertisement
It is interesting to note that all European countries, except for the UK, have a ban on one form of alcohol advertising or another to protect children. In his paper, ‘Is it time to ban alcohol advertising?’\textsuperscript{xii}, World Health Organisation consultant Peter Anderson claims that since advertising commonly crosses country borders, “there is an argument to approximate advertising rules across Europe banning alcohol advertising targeted to young people, a highly cost effective measure to reduce harmful alcohol use”.

**Conclusions and recommendations to government and policy makers**

Alcohol marketing, according to the evidence above is not only reaching children in large numbers but also having an adverse affect on their alcohol consumption. This poses the question of how to prevent alcohol marketing from reaching children. Although a ban on alcohol marketing may be the most obvious method, there is as yet insufficient evidence to fully support this approach and restricting marketing as tightly as possible to protect children is a necessary first step. There may come a time when a full ban is the only effective option to policy makers.

Alcohol Concern believes the regulations in the Loi Évin provide some of the most robust methods for restricting advertising to adults only and provide a useful guide. Alcohol Concern does not advocate a total ban on alcohol marketing at present, however too many young people in the UK are being exposed to alcohol marketing unnecessarily. With current regulations, it is inevitable that children will be exposed to cumulative alcohol advertising and at sports and music events.

The Health Select Committee’s inquiry into alcohol concluded that “The current system of controls on alcohol advertising and promotion is failing the young people it is intended to protect. The problem is more the quantity of advertising and promotion than its content\textsuperscript{xiii}.” For this reason we advocate significantly tighter restrictions on broadcasting regulations, including a 9pm watershed ban on all alcohol marketing on TV and radio - and for any subsequent advertisements to only be broadcast where under-18s make up less than 10% of the audience. Alcohol advertising in cinemas should only be shown during 18-rated films, for the same reason.

Alcohol advertising should only appear in locations and at times where as far as possible children are not present to view them. For this reason we advocate that there should be a ban on alcohol marketing on billboards, during sports and music events and on the internet, where attempting to regulate who sees what is impossible. In addition, as in the Loi Évin, alcohol marketing should only refer to the qualities of the product and carry a health message.

According to the international evidence, this, alongside other measures such as tackling the promotion of alcohol through cheap sales, will help to delay the onset of drinking among children and reduce consumption of those who drink.

If we are to reframe our cultural relationship with alcohol and reduce resultant health harms, tackling childhood drinking must be a
primary aim. Alongside other necessary measures on price, there must be an end to the current saturation levels where millions of children are exposed to alcohol branding not necessarily intended for them.

In summary, Alcohol Concern advocates that the UK government consider the following recommendations to ensure alcohol advertising is targeted at adults only:

1. A 9.00pm watershed ban on alcohol marketing on TV and radio and for subsequent advertisements to only be broadcast if the proportion of under-18s viewing is less than 10%
2. A total ban on alcohol marketing or sponsorship on the internet, on billboards and at sports or music events
3. A restriction to advertise alcohol only in cinemas showing films with 18 certificates
4. Messages and images should refer only to the qualities of the products such as ABV, origin, composition, means of production, patterns of consumption
5. A government health message must be included on each alcohol advertisement comprising a sixth of the advert\textsuperscript{iv}.

In addition, in order to improve the accountability of the regulatory system, it should be wholly independent of the advertising and drinks industry. Only with the recommendations set out above will the next generation of children in the UK have a better chance of growing up in a world less saturated with alcohol marketing - and as a result have a healthier relationship with alcohol.

References


ii Wave 1 of Hastings et al, NPRI study in Under the Influence – the damaging effects of alcohol marketing on young people, BMA 2009.


v Wales Centre for Health and National Public Health Service for Wales (2009) A profile of alcohol and health in Wales, Cardiff, Wales Centre for Health.

vi Alcohol Related Hospital Statistics 2010, Information Services Division, Edinburgh.


viii NICE Public Health Guidance 24 – Alcohol use disorders: Preventing the development of hazardous and harmful drinking, National

ix If the proportion of children aged 10-15 watching a programme is more than 20% higher than the proportion of the UK television population watching the programme, alcohol advertisements cannot be shown (ASA definition).

x Not in Front of the Children, Alcohol Concern, 2007.

xi See the Alcohol Concern response to the Code Review Consultation for the Committee of Advertising Practice, July 2009.


xiv Modelling evidence published in 2008 by University of Sheffield estimated that this measure would save between £390m and £3.9bn over 10 year and avoid between 7 and 119 alcohol-related deaths each year, as a result of the lower advertising spend alone.