

Updated

# The sale and marketing of zero-alcohol drinks

## Policy briefing



## Contents

• About us	3
• Summary and recommendations	4
• Introduction	5
• The size of Ireland's zero-alcohol market	6
• Why does the alcohol industry aggressively market their products?	7
• Why does the alcohol industry use the same branding for zero-alcohol and alcohol products?	8
• Circumventing Ireland's advertising protections for children	10
• Sport and zero-alcohol advertising	12
• 0.0 alcohol advertising - what do children see?	14
• Why does zero alcohol advertising pose a risk to children and teenagers?	16
• Structural separation of alcohol products and the emergence of 'zero zones'	17
• Lack of regulation around sale	17
• Zero alcohol: zero harm? - The health evidence	18
• A decade of excess - increases in youth drinking	21
• Young people and alcohol - what's the harm?	22
• How to protect children and young people	24
• Recommendations and conclusion	25

## About us

Alcohol Action Ireland (AAI) is the national independent advocate for reducing alcohol harm. We campaign for the burden of alcohol harm to be lifted from the individual, community and State, and have a strong track record in effective advocacy, campaigning and policy research.

Our work involves providing information on alcohol-related issues, creating awareness of alcohol-related harm and offering policy solutions with the potential to reduce that harm, with a particular emphasis on the implementation of the Public Health (Alcohol) Act 2018. Our overarching goal is to achieve a reduction in consumption of alcohol and the consequent health and social harms which alcohol causes in society.

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## Summary

This policy paper examines the alcohol industry's three-pronged use of 0.0 alcohol products, as a tactic to circumvent the child protection provisions contained in the Public Health (Alcohol) Act 2018 (PHAA), as a means of boosting brand recognition and sales of the alcohol main brand, and a way of displacing soft-drinks.

Despite representing just over 1% of the total alcohol market, 0.0 alcohol products have been subject to aggressive advertising, with major brands using identical branding to their full-strength counterparts, in spaces where alcohol advertising is otherwise restricted by the PHAA. This document further explores new research which reveals that the industry's promotion of zero-alcohol products is primarily commercially motivated, serving to boost main brand recognition and sales rather than to reduce alcohol consumption or alcohol related harm.

Moreover, this policy document will outline how years of research now demonstrates that children don't distinguish 0.0 alcohol branding from full-strength alcohol branding, and that exposure to such advertising has a similar effect on adolescents as exposure to conventional alcohol advertising. This is of particular concern given that alcohol consumption among 15–24-year-olds in Ireland increased from 66% in 2018 to 78% in 2025, making this cohort the highest-consuming age group in the State.

This policy paper concludes with a series of recommendations to government to explicitly prohibit the marketing of zero alcohol products in child-protected environments, to ban brand sharing, alibi marketing, and surrogate marketing, to introduce regulations governing the sale of zero-alcohol products to minors, and to monitor the public health implications of zero-alcohol consumption.

## Recommendations

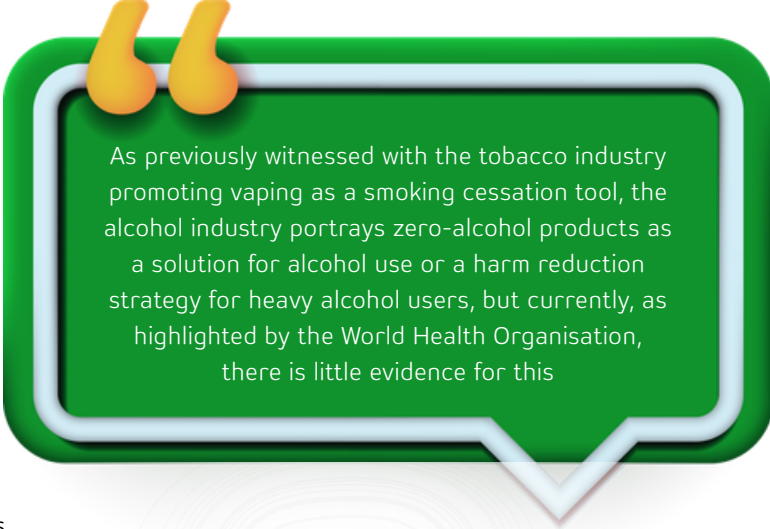
- Prohibit the marketing of zero-alcohol drinks to children and in the spaces designated by PHAA as children's environments. This will require legislation to make explicit what was already implicit in the Public Health (Alcohol) Act 2018.
- Ban brand sharing, alibi marketing, and surrogate marketing – i.e. advertising that associates zero-alcohol products with the full-strength brands. This is in place in Norway.[1]
- Develop regulations around the sale of zero-alcohol products, especially clarity in relation of sales to children.
- Monitor the consumption of these products and impact on aggregated alcohol consumption to understand the public health implications of zero-alcohol products.

## Introduction

Many leading alcohol producers now have alcohol-free and low-alcohol variants, beverages known in different countries around the world as no, low, zero, alcohol free or non-alcoholic drinks, or NoLos. Despite constituting a small share of the alcohol market, recent years have witnessed aggressive advertising of these drinks, especially zero-alcohol products.

Those products that are of particular concern to policy makers, politicians and parents are ones that share similar branding to their regular-strength counterparts, as they further normalise a culture of alcohol consumption, blur potential conflicts of interest in developing public health policies, and mislead and target children with advertisements in spaces which are child protected under the Public Health (Alcohol) Act 2018 (PHAA).

As previously witnessed with the tobacco industry promoting vaping as a smoking cessation tool, the alcohol industry portrays these products as a solution for alcohol use or a harm reduction strategy for heavy alcohol users, but currently, as highlighted by the World Health Organisation (WHO) there is little evidence for this.[2] The drinks, the WHO says, have possible drawbacks and implications, such as misleading minors, pregnant women, abstainers or those seeking to stop drinking about their actual ethanol content.[3] For example so called zero-alcohol or zero-alcohol products may contain up to 0.5% ABV. [4][5]



As previously witnessed with the tobacco industry promoting vaping as a smoking cessation tool, the alcohol industry portrays zero-alcohol products as a solution for alcohol use or a harm reduction strategy for heavy alcohol users, but currently, as highlighted by the World Health Organisation, there is little evidence for this

For several years AAI has been recommending that the Department of Health examine how the marketing of zero-alcohol products is contravening the letter, and the spirit, of the PHAA. In particular we have called on the Minister for Health to close the legislative loophole which allows for such marketing as it poses a significant risk to children and minors.

This briefing specifically sets out concerns around the marketing of 0.0/zero-alcohol products, using the same branding as the master brand, in areas restricted under the PHAA and calls for the child protection measures in that legislation to be applied to this type of alcohol brand marketing.

## The size of the zero-alcohol market in Ireland

The bulk of available zero-alcohol products are in the beer and spirit categories. Industry data notes that in 2024 zero-alcohol beer products made up around 2.5% of the beer market in Ireland[6] and zero-alcohol spirits made up around 0.4% of spirit market.[7] Specific industry data for zero-alcohol wines in Ireland is not available. EU data[8] indicates that in the country sector which includes Ireland, the combined market for low and no alcohol is 0.1% of the total wine market. Specific industry data for zero alcohol cider has not been made available but we have assumed a figure of 1% of the total cider market, which is likely an overestimate.

Beer, spirits, wine and cider account for 42.4%, 22.5%, 29.6% and 5.5% respectively of the overall alcohol market.[9] Hence we can say with confidence that zero-alcohol products account for approximately 1.3 % of the total alcohol market.

### Alcohol market



Alcohol



Zero-alcohol



## Why does the alcohol industry aggressively advertise their products?

Alcohol is one of the most heavily marketed products in the world with estimates on annual spending ranging from \$7.7bn to \$17.7bn.[10][11] In Ireland, the annual spend on marketing alcohol to the public was conservatively estimated to be €115m in 2021. The purpose of marketing is clear – it is to create a need or desire for a product. When it comes to alcohol this is most interesting because alcohol is not a staple, it is not a necessary purchase, therefore a market must be created for it – and new drinkers must be recruited to create, sustain, and expand that market.[12]

We have known for some time alcohol advertising seeks to recruit new drinkers and increase sales among existing consumers of alcohol, including young people and children, as well those with alcohol use disorder and dependency.[13]

Alcohol is advertised to us in a variety of ways. Sponsorship at sports and music events, products promoted in our favourite movies and TV shows, and displays in shops to celebrate Valentine's Day, Father's Day, weddings, and birthdays. It is everywhere we look. The alcohol industry companies spend millions linking alcohol with the things we love – watching football, GAA, or rugby, going to a gig, sharing a romantic meal. Their aim is to establish alcohol as an everyday item, an essential part of normal life.

The purpose of this is to normalise alcohol and influence when we start to drink, how much we drink, and how often we drink.[14] It was for this reason that the PHAA aimed to reduce the direct or indirect promotion of alcohol products, especially towards children. Some of the most important ways the legislation sought to do this was through:

- **Section 14** which, from November 2019, placed a ban on advertising within 200m of schools, public parks and on public transport
- **Section 22** which, from November 2020, restricted alcohol ads in shops to a designated zone
- **Section 15** which, from November 2021, placed restriction on alcohol advertising in, or on, a sports area or during events
- **Section 19** which, from January 2025, introduced a daytime alcohol advertising broadcast watershed.[15]

As such, the broad suite of PHAA measures to reduce alcohol advertising are in places that children inhabit - near schools, near playgrounds, on trains and buses, in cinemas, in shops and supermarkets, on television and radio – and also on the field of play in sports.[16] The modest measures, watered down significantly through industry lobbying, are also intended to protect the population in general from drowning in a constant sea of alcohol ads.[17]

## Why does the alcohol industry use the same branding for zero-alcohol and alcohol products?

A striking divergence exists between how zero-alcohol products are described publicly, as tools for moderation, and how they are presented in industry-facing publications, as tools to drive market growth and increase main brand sales.[18] Research examining communications from major alcohol companies found that while corporate responsibility reports frame zero-alcohol products as supporting responsible consumption, executives in trade and business publications discuss the same products as mechanisms for expanding into new markets, targeting new drinking occasions, and competing with soft drinks and other non-alcoholic beverages.[19]

You get to a point in the day when you're coffeed-out ... We believe we can go on the offensive and go after Coke, go after Fanta, go after spring water, go after tea, go after coffee...There is no limit to when you can drink... Heineken 0.0

- Director at Heineken UK

*"You get to a point in the day when you're coffeed-out ... We believe we can go on the offensive and go after Coke, go after Fanta, go after spring water, go after tea, go after coffee...There is no limit to when you can drink... Heineken 0.0... You can drink this driving home in your car. If you think about all the occasions that people drink a soft drink today - we can be in that market." - Director at Heineken UK[20]*

Indeed, a striking example of the lengths the alcohol industry will go to circumvent restrictions was seen in India, where Diageo launched a lemonade using identical branding to Johnnie Walker whisky. As such, Diageo's decision to front its presence at Lollapalooza India with a non-alcoholic lemonade carrying full Johnnie Walker branding reinforces the commercial chicanery underpinning many zero-alcohol advertising strategies. This is because India's restrictions on direct spirits advertising make conventional alcohol marketing almost impossible, and the launch demonstrates precisely how such products can serve as vehicles for brand building in markets that would otherwise be closed to the alcohol industry. [21]

As stated, the commercial intent behind zero-alcohol sponsorship is regularly acknowledged within the alcohol and marketing industries. This is especially true within sports marketing with industry analysts stating explicitly that the alcohol industry is leveraging zero-alcohol sports sponsorship as an awareness builder and a means to get

around alcohol advertising regulation.[22] Such an admission is particularly significant as it confirms that circumventing advertising restrictions is understood within the industry as a primary function of zero-alcohol sponsorship, not an unintended consequence. Moreover, the same analysis highlights that sport is a core area for zero-alcohol brand targeting because of its large and disproportionately young audiences – a point which we be returned to later in this document.

We know that zero alcohol products are opening different advertising and sales channel approaches than low alcohol, because there are fewer restrictions bringing greater marketing opportunities.[23] However, a less spoken about aim of zero-alcohol products is their efforts to displace non-alcoholic drinks, such as soft drinks and water, with zero-alcohol products in social occasions.

IWSR, the alcohol industry's own data, analytics and insights company have noted that[24]: *'No-alcohol is mostly replacing non-alcoholic drinks (such as soft drinks and water) in the same occasion, presenting an incremental growth opportunity for producers.'*

The same industry analysis also pointed out that: *'No-alcohol is opening up different advertising and sales channel approaches than low-alcohol, with fewer restrictions bringing opportunities in ecommerce.'*

This certainly provides evidence that zero-alcohol products are being pushed as an additional product to alcohol, not a replacement product.

In the Irish context, however, it is exceptionally interesting that the commercial intent behind zero-alcohol advertising is often openly acknowledged by industry itself. Marketers for Heineken 0.0 stated in a 2021 submission that advertising their non-alcoholic product had a beneficial effect on the Heineken main brand, compounding overall brand growth.[25] When advertisers openly admit that zero-alcohol marketing boosts sales of core alcohol products, the public health implications are impossible to ignore.




## Circumventing Ireland's advertising protections for children

In recent years the alcohol industry has developed a sophisticated set of strategies to maintain brand visibility in environments where alcohol advertising is restricted, with zero-alcohol products playing a central role. Because the ABV of these products typically falls outside the legal definition of alcohol, they are not subject to the same advertising controls as full-strength alcoholic drinks.

This has resulted in a regulatory gap that the alcohol industry has actively exploited across multiple jurisdictions, including Ireland.[26]

This practice, commonly referred to as surrogate or alibi marketing or brand sharing, enables continued brand exposure even where restrictions apply.

Ireland has witnessed this first hand. Just as the child protection measures in the PHAA came into force, big alcohol brands began brand sharing – that is advertising zero alcohol products using the same parent branding, logos, colours and parent name as the main alcohol brand – in the spaces where PHAA restricted alcohol advertising.



Research from the UK indicates that 98 per cent of zero-alcohol beer sales in the off-trade come from products that share branding with a regular alcoholic drink, such as Heineken 0.0 and Heineken, or Guinness 0.0 and Guinness

Indeed, it is of note that in the outdoor space where most of the PHAA restrictions are in place, zero alcohol ads made up 25 percent of the spend of alcohol brand advertising in 2022, up 31 percent from 2021, even though these products only make up around 1.2 percent of the total alcohol market.[27] Little wonder, therefore, that research revealed surveyed members of the public were as likely to recall alcohol advertising in the outdoors space after the PHAA as before it.[28] Moreover, recent research from the UK indicates that 98 per cent of NoLo beer sales in the off-trade come from products that share branding with a regular alcoholic drink, such as Heineken zero-alcohol and Heineken, or Guinness 0.0 and Guinness.[29]

It is accepted that zero alcohol products are not suitable for children. Even the advertising industry funded body the Advertising Standards Authority says that zero alcohol product advertising should not be in children's media or proximate to schools[30], while researchers and public health bodies including the WHO have been drawing attention to these concerns in recent years.[31] So why then are they being advertised in the very areas which are deemed protected for children?

Zero alcohol advertising is not being pushed because the alcohol industry wants people to drink less, they are being aggressively advertised for three reasons – to increase main brand alcohol sales, to challenge the market share of soft drinks, and to sidestep the PHAA protections on where the industry can advertise their brands.

Strong brand recognition, whether driven by advertising the brand through zero-alcohol or alcohol products, can result in higher sales and profit margins. Indeed, the marketers of Heineken zero-alcohol have admitted as much.[32] Elaborating on their Heineken zero-alcohol campaign in Ireland the marketers were keen to show that their efforts increased Heineken brand loyalty and also contributed to increased sales not just of zero-alcohol but also of Heineken.[33]

The marketers stated the non-alcoholic product “drove advocacy through excellent product experience and positive conversation around the brand.”.[34] This also had a “beneficial effect on Heineken main brand.”. They further noted that the “success of the Heineken zero-alcohol campaign has compounded growth for the brand overall in a shrinking market.”.[35]



Left: Zero-alcohol products that use the same branding as their full-strength alternatives proliferate in areas that are deemed child protected by the Public Health (Alcohol) Act.



Left: Heineken 0.0's new product range aims to widen drinking occasions[36] by targeting the soft drinks market with its bright, child-friendly colours and soft drinks-type flavours

## Sport and zero-alcohol advertising

Recent sports events have revealed these practices first hand as the alcohol industry has sought to put their brand at the centre stage of important sporting events. Research from the University of Stirling found alcohol brand references being shown at a rate of up to one every 8 seconds on the field of play during some high-profile rugby matches after the PHAA restrictions came into place.[37]

Indeed, research documented that over 83% of alcohol brand references observed during broadcasts of the 2022 Six Nations Rugby Championship were for zero-alcohol variants of established brands.[38] Similarly, focus group research with children and teenagers found that zero-alcohol sponsorship of sport was rarely identified as marketing for non-alcoholic products, with children consistently associating the products with the full-strength master brand.[39]

Unsurprisingly, this has paid off for the alcohol companies, with Diageo noting the success of their sponsorship of the Six Nations Rugby Championship which saw increased sales of both Guinness and Guinness zero-alcohol in stadiums with much larger volumes of full-strength Guinness compared with zero-alcohol.[40]

However, this is exactly what the PHAA was supposed to protect against, especially in terms of alcohol advertising being seen by children, because evidence shows that exposure to alcohol marketing encourages children to drink at an earlier age and in greater quantities than they otherwise would.[41] This is why the PHAA had, in effect, child protection measures, in Section 15, to restrict alcohol advertising on the field of play in sports.



In order to further protect children from the direct or indirect promotion of alcohol products, Section 19 of the PHAA legislated for a daytime broadcasting ban on alcohol advertising with no advertisements for alcohol products on television from 3am to 9pm and on radio on a weekday from 3pm to 10am the following morning.[42] This modest measure, after a bizarrely long delay, finally came into operation on 10 January 2025. Yet, throughout Ireland's home games in the Guinness Six Nations Rugby Championship in 2025 and 2026, we saw an advertisement for Guinness emblazoned on the field of play, with a zero-alcohol tagged on, broadcast to children watching in homes around the country.

We also witnessed alcohol advertising on the field of play during the Ireland's recent UEFA Nations League and FIFA World Cup qualifying football matches, where Carlsberg displayed their logo behind both goal end lines, again, with a zero-alcohol tagged on. There was a particularly egregious example of a zero-alcohol product being advertised on the sports surface which is not even available on the market.[43] Forged Irish Stout zero-alcohol was prominently displayed on the boxing ring during a high-profile Katie Taylor fight in May 2023. Under PHAA rules, alcohol branding should not be displayed on the ring. The manufacturer claimed that the product was in development. This product is still not available (May 2026).

Unsurprisingly, research indicates that shared branding successfully increases young people's brand familiarity and affects their brand recognition and brand awareness.[44] Brand sharing also means that children who see people drinking what appears to them to be alcohol – because of the same branding – will at a young age be conditioned to think differently about when and where it is appropriate to drink alcohol.

Indeed, international research revealed young people "...who saw the logos of companies that sell both alcoholic and zero-alcohol beverages were found to associate the logos primarily with the alcoholic versions of the products, indicating that zero-alcohol beverages are working as advertising vehicles for parent companies and their broader product portfolios.".[45]

The qualitative focus group study revealed that branding strategies seemed to successfully increase young people's brand familiarity and affected their brand recognition and brand awareness.[46] Resultantly, the research concluded that early exposure to alcohol brands and alcohol brand sharing increases brand familiarity and, among other factors, potentially affects drinking attitudes and purchase intentions of young people.[47]



Left: The Champions Cup rugby final with both Heineken and Heineken 0.0 branding on display



Right: Ireland v England, UEFA Nations League, Aviva Stadium, with Carlsberg 0.0 branding next to both goals

## 0.0 alcohol advertising – what do children see?

With advertisers admitting that 0.0 product marketing is effective in increasing sales of core alcohol brands, it is little wonder that children interviewed as part of comprehensive research into young people's views of no and low alcohol product sponsorship stated "... I just saw the alcohol brand, I never really thought of the zeros".[48] While others as young as 14 were able to identify Guinness as the sponsor of the Six Nations rugby championship [49], with children noting that Guinness was highly visible during rugby union matches and that they had seen advertising around the stadium and on the pitch[50].

- **Interviewer:** *Yeah, and what kind of sponsors do you see at rugby?... can you think of anything else?*
- **Respondent 2:** *Guinness.*
- **Interviewer:** *Guinness, yeah?*
- **Respondent 2:** *Six Nations, yeah (Group 6, 14–15, Male). [51]*

As highlighted in the previous section, recent sports events have revealed these practices first hand as the alcohol industry has sought to put their brand at the centre stage of important Irish sporting events. Despite the PHAA restricting alcohol advertising on sports surfaces – be it a pitch, court, ring, course, etcetera – the alcohol industry has used 0.0 advertising to circumvent the law.

All these tactics by the alcohol industry are having serious impacts on children and young people. Recent research revealed that the use of 0.0 products, alibi marketing, and brand sharing tactics are used to sustain alcohol brand presence in sport, potentially normalising alcohol use and undermining policy efforts to reduce alcohol-related harm.[52]

The findings, which revealed children and young people, as young as eleven years old, exhibit a high level of brand awareness in relation to alcohol, are a particular cause for concern. As one child put it – "I think I've noticed whether they say low or not or have the zeros. But I don't think I've ever really, I'm not sure, I just saw the alcohol brand, I never really thought of the zeros".[53]

The capacity of children and young people to recognise alcohol brands at such young ages underscores the pervasive nature of marketing in their environments. Research from Britain has again shown that sports sponsorship is a major source of exposure to alcohol



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marketing with many children and young people surveyed stating that they see alcohol marketing most of the time when they watch live televised sports events.[54] Indeed, this tallies with Australian research which found that exposure to 0.0 alcohol advertising prompts adolescents to think of alcohol in a similar manner to when they are exposed to alcoholic drinks.[55]

As has been stated throughout this paper – the purpose of marketing is to create a need or desire for a product, and the alcohol industry uses sport to drive increased sales and thereby increased alcohol consumption, and as previously stated, research and systematic reviews have reported a positive association between exposure to alcohol marketing and alcohol consumption – especially in relation to children and young people.



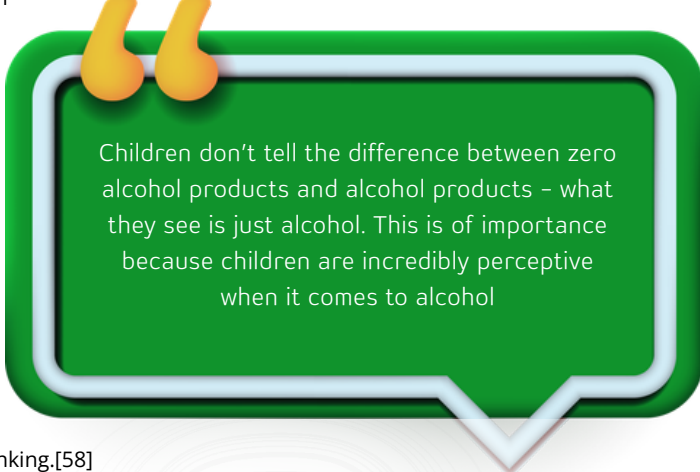
Pictured:  
Alcohol branding  
(with a 0.0 tacked  
on) dominates the  
entrance and exit  
points of  
supermarkets,  
making it impossible  
for children and  
adults alike to  
avoid seeing



## Why does zero alcohol advertising pose a risk to children and teenagers?

As shown throughout this policy paper, children don't tell the difference between zero alcohol products and alcohol products – what they see is just alcohol. This is of importance because children are incredibly perceptive when it comes to alcohol.

Research has shown that children start to acquire knowledge about alcohol at age two, at three children can recognise and identify alcoholic beverages, by four they understand alcohol use in adult culture and have certain expectations regarding what happens to people when drinking alcohol, and by five they understand the norms of alcohol as an adult product as well as knowing what is a socially acceptable amount of alcohol use. [56][57] This illustrates the ages by which children can comprehend alcohol as a product and therefore the impression it is making on them in important developmental years.



Children don't tell the difference between zero alcohol products and alcohol products – what they see is just alcohol. This is of importance because children are incredibly perceptive when it comes to alcohol

Moreover, the evidence is clear – exposure to alcohol marketing is a cause of youth drinking.[58]

As noted, the evidence also shows that this exposure to alcohol marketing encourages children to drink at an earlier age and in greater quantities than they otherwise would.[59] This research is compounded by the fact that a new study has shown that the exposure of teenagers to zero-alcohol drinks has a similar effect to exposure to alcoholic drinks.[60]

Findings from the 'Alcohol advertising in disguise: Exposure to zero-alcohol products prompts adolescents to think of alcohol' study suggest that, as least for adolescents, zero-alcohol drinks are best understood as members of the category of alcoholic drinks.[61] Therefore, "exposure to zero-alcohol drinks within retail settings and through advertisements is thus likely to prompt adolescents to think of alcohol in a similar manner to when they are exposed to alcoholic drinks, suggesting that regulatory approaches that seek to limit adolescents' exposure to alcohol should also extend to zero-alcohol drinks.".[62]

Such analysis chimes with other, recent studies on how the alcohol industry itself sees NoLo products. Research revealed the industry views these products as an opportunity to grow the total alcohol market, implying that they seek for NoLos to be used in addition to alcohol, not as a substitute for it.[63]

*"That's where the incrementality comes from. A lot of these occasions that we're starting to see growth in don't come from traditional beer consumption moments because, of course, it's operating as an adult beverage."* - CEO of AB InBev[64]

## Structural separation of alcohol products and the emergence of ‘zero zones’

The Public Health (Alcohol) Act – Section 22 – contains a provision for structural separation of alcohol products in mixed retail outlets, such as supermarkets, convenience stores or neighbourhood shops, which means alcohol products can no longer be displayed as routine grocery goods, and that children’s exposure to alcohol in an everyday setting is limited.

However, in recent years alcohol brands have been using zero-alcohol products to establish “zero zones” to display products outside of the structurally separated alcohol sections in supermarkets and shops. Moreover, they have also begun to use zero-alcohol products to advertise their brands throughout shops and supermarkets.

## Lack of regulation around sale

Another issue regarding zero alcohol products is that there is no law preventing these drinks being sold to people aged under 18. It is understood that retailers, bars and pubs are generally treating such products as alcohol products and not selling to under-18s, but there is no legal framework around this. However, in the off-trade, retailers such as supermarkets and shops are displaying and advertising these products outside of the structurally separate area for alcohol products – saturating separate and safe shopping spaces with alcohol advertising.

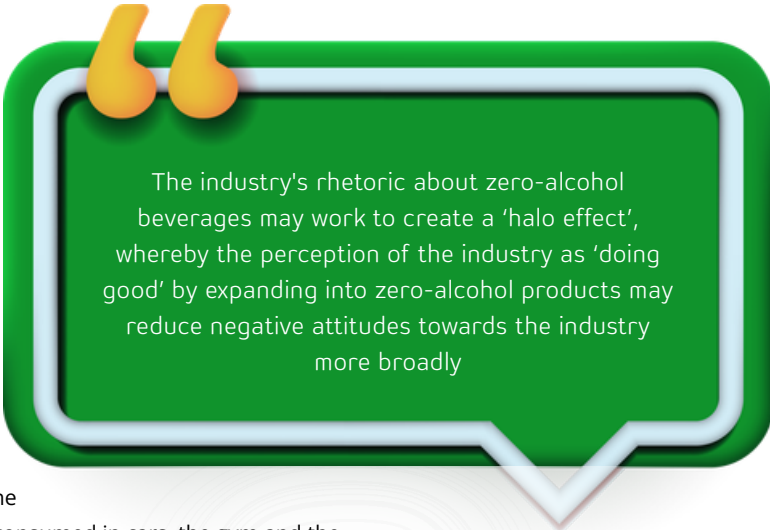
The WHO states, “Policies and regulations about NoLos’ availability, acceptability and affordability are lacking and evidence about their benefits is limited. Concerns have been raised about the impact of NoLos in reducing alcohol consumption and its associated harm and the possible drawbacks and implications, such as misleading minors, pregnant women, abstainers or those seeking to stop drinking about their actual ethanol content.” [65]

As well as needing to be regulated in terms of sales and marketing, there is a need to monitor the consumption of these products to fully understand who is consuming them and in what settings. While there is a paucity of data and research into sales of zero-alcohol products, early information from Britain indicates that while there are increases in sales, there is no real evidence of substitution from alcohol. Furthermore, that research states there is insufficient clear evidence that NoLos are reducing alcohol-related harm.[66]

## Zero alcohol: zero harm? – The health evidence

Evidence about the benefits of zero-alcohol products is limited, but concerns are many. As previously witnessed with the tobacco industry promoting vaping as a smoking cessation tool, the alcohol industry portrays these products as a harm minimisation tool, as a health solution for alcohol use, and as a harm reduction strategy for heavy alcohol users, but currently, as highlighted by the WHO there is little evidence for this.[67][68] Further research also highlights the lack of evidence to support a substitution hypothesis, particularly as alcohol companies frequently market zero-alcohol beverages as drinks to consume in new locations, such as in the workplace, or by previously non-drinking groups, such as pregnant women.[69]

Academics and advocates state that this marketing approach implies to consumers that zero-alcohol beverages are to be consumed as additives to, not substitutions for, regular alcoholic beverages. For instance, research showed that during an advertisement campaign for Heineken zero-alcohol, only 1 in 10 of Instagram posts showed the product in a traditional bar or pub setting, with the others showing the beverage being consumed in cars, the gym and the workplace.[70] In other words, some producers aim to encourage “additional” overall consumption of their zero-alcohol products by encouraging a shift away from soft drinks and hot beverages and towards zero-alcohol products.[71]



The industry's rhetoric about zero-alcohol beverages may work to create a 'halo effect', whereby the perception of the industry as 'doing good' by expanding into zero-alcohol products may reduce negative attitudes towards the industry more broadly

This is problematic, as while companies state that they have expanded into the zero-alcohol market because they are committed to the long-term and sustainable reduction of harmful drinking, their marketing strategies of promoting consumption of zero-alcohol beverages in new locations and scenarios demonstrates that their claims are disingenuous. [72] Indeed, Heineken representatives have explicitly stated an intention for Heineken zero-alcohol to take market share from soft drinks.[73]

Moreover, as the research paper, 'Zero-alcohol beverages: Harm-minimisation tool or gateway drink?', stated, there is additional concern that “the industry's rhetoric about zero-alcohol beverages may work to create a 'halo effect', whereby the perception of the industry as 'doing good' by expanding into zero-alcohol products may reduce negative attitudes towards the industry more broadly”.[74]

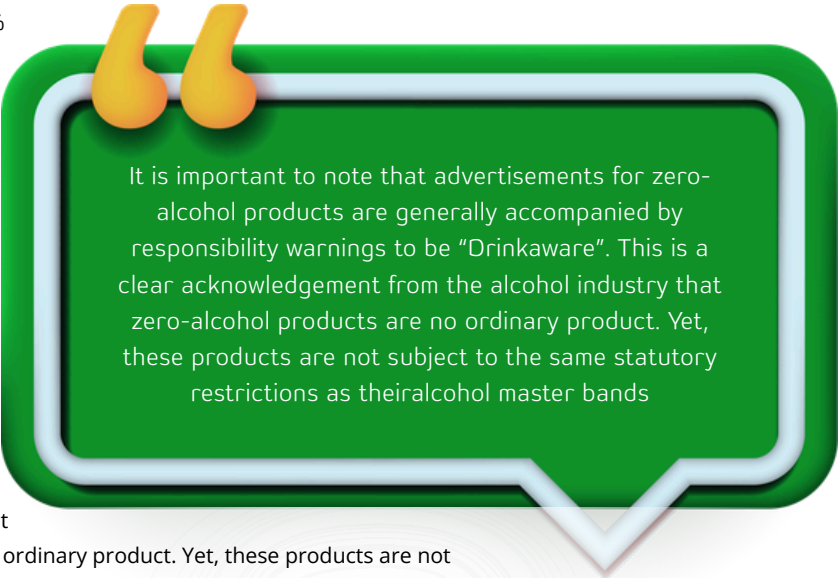
Additionally, issues have constantly been raised about the impact of zero-alcohol product

consumption for people in-recovery. Research has indicated that some of those working in the treatment space feel there might be risks to those with alcohol dependency, given the potential of zero-alcohol products to cause a relapse back into drinking.[75] Concerns have also been raised by those in the recovery space about the marketing of these products as “zero-alcohol” or “no-alcohol”, when, in fact, these products may have up to 0.5% ABV.

Indeed, defining what constitutes a zero-alcohol product is in itself confusing. There is, in fact, no legal definition of what constitutes a zero-alcohol product, rather, the products are defined in opposition to the legal definition of what constitutes an alcohol product.

The PHAA defines an alcohol product using the definition contained within section 73 of the Finance Act 2003, that is, any drink with an alcoholic strength more than 0.5% ABV. Therefore, products with less than 0.5% ABV can be defined as “alcohol free”, even though they contain the presence of alcohol. While there are other products on the market with as little as 0.03% ABV, zero-alcohol products can have up to 0.5% ABV and still be described as “0.0” or “alcohol-free”.

Such a situation has led to accusations of deceptive marketing, and it is also important to note that advertisements for zero-alcohol products are generally accompanied by responsibility warnings to be “Drinkaware”. This is a clear acknowledgement from the alcohol industry that zero-alcohol products are no ordinary product. Yet, these products are not subject to the same statutory restrictions as their alcohol master bands.



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Different industrial and artisanal techniques are used to achieve low-alcohol content beverages. Therefore, regulations regarding the content of alcohol in beverages and strategies to monitor compliance are important, because they are the main reason for classification of the beverages and are central to their categorization and market labelling. Furthermore, analytical techniques with adequate sensitivity as low as 0.04% vol are necessary to determine the alcohol ranges necessary for classification.

The definitions of NoLo alcohol products are described and the differences in the legal definitions of these products in several regions of the world are highlighted. Currently, there is clearly confusion regarding the terminology of “no”, “free”, “zero”, “low”, “light”, or “reduced” alcohol products. There is an urgent need for global harmonization (e.g., at the Codex Alimentarius level) of the definitions from a commercial perspective and also to have common nomenclature for science and for consumer information. It is for that reason the WHO recommends that the alcohol by volume content of NoLos must be defined, harmonised and clearly labelled.

Finally, the impact of zero alcohol beverages drinks on such health outcomes is a complicated area, and one where there is a paucity of research and data, especially in a domestic context. While some of the discussion of these drinks in news articles and by government focuses on their potential to reduce levels of alcohol consumption – by helping individuals to cut back or give up on drinking – this is a somewhat simplified picture.[76] [77] The reality is there is limited existing evidence that clearly demonstrates the health impacts from the use of zero-alcohol products.[78]

Therefore, until such time as the evidence exists, these products should not be pushed as a health-based alternative. In addition, further domestic research is required on who is purchasing and consuming zero-alcohol beverages and in what locations, and what impact this may have on alcohol consumption.

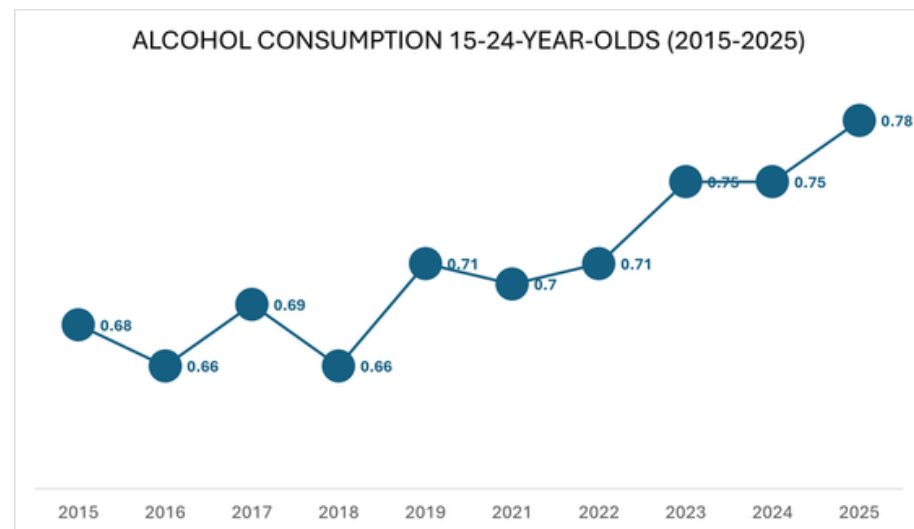


A Drinkaware warning accompanying a zero-alcohol product [79]

## A decade of excess – increases in youth drinking

When we look at the data on youth drinking, we can get an appreciation for the seriousness of the situation. Alcohol is the most commonly used substance among young people in Europe and is most commonly the first substance used by children.[80] Alcohol is so deeply entrenched in our lives that it is easy to discount the health and social damage caused or exacerbated by drinking alcohol.[81] However, alcohol consumption among young people is a particular public health concern for government and policy makers as it carries significant health risks.[82]

While drinking among young people declined from the mid-2000s to the mid-2010s, since 2015, that downward trend has reversed with consumption by 15–24-year-olds increasing from 66% in 2018 to 78% in 2025.[83]



Alcohol consumption amongst 15–24-year-olds (2015–2025) as recorded by Healthy Ireland Survey's. NB. In 2019 Healthy Ireland data on alcohol was collected through the National Drug and Alcohol Survey, while in 2020 the Healthy Ireland Survey was cancelled due to Covid19. [84][85][86][87][88][89][90][91][92][93]

Worryingly, this makes young people the largest alcohol consuming age group in the State. Even more concerning is that when drinking is initiated by young people it is accompanied by high levels of particularly risky and hazardous consumption - 64% regularly binge drink and one in three young drinkers has an Alcohol Use Disorder.

With such high levels of hazardous and binge drinking come associated harms across a range of areas, such as physical and mental health, criminal justice, road safety, economic productivity, amongst others.

## Young people and alcohol – what’s the harm?

Alcohol is no ordinary commodity; it is a depressant drug with significant health implications for those who use it, and it is a significant risk factor for suicide, as recognised by the World Health Organisation.[94] Young people classified as problem or hazardous drinkers are most likely to be in the severe category for depression and more likely to have engaged in deliberate self-harm or have attempted suicide. In almost three-quarters of suicide cases among young people, there was a history of alcohol and/or drug use.[95]

Research from the Netherlands found indications that alcohol consumption can have a negative effect on brain development in adolescents and young adults and entails a risk of later Alcohol Use Disorder.[96]

There is also extensive evidence that drinking alcohol as a child, which is the norm rather than the exception in Ireland, is more likely to lead to heavy episodic drinking and is a known risk factor for later alcohol dependency.[97]



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Little wonder, therefore, that the 2019–20 National Drug and Alcohol Survey[98] indicated that 70% of young male drinkers (15-24) met the criteria for hazardous drinking, with 38% of all drinkers aged 15-24 classified as having an alcohol use disorder (AUD). The same survey also found that 8% were considered to have possible alcohol dependence.

Using this data, we can estimate from CSO population statistics[99] that there could be over 43,000 young people with alcohol dependence across Ireland. Moreover, this is reinforced by data in the 2025 Growing up In Ireland survey which recorded that 44.5% of men and 33.6% of women aged 25 are drinking at hazardous levels.[100]

Globally, in 2019, alcohol use ranked second for attributable disability-adjusted life-years (DALYs) among adolescents and young adults aged 10-24 years.[101] Alcohol contributes to all the leading causes of death for young people: suicide, road traffic collisions, poisoning, and assaults, while long-term use is linked to seven different types of cancer, cardiovascular disease, and liver disease.[102]

Furthermore, acute alcohol related conditions tend to be more common among younger

people.[103] Alcohol-related hospitalisations among young people increased by 12% between 2015 and 2018 while the number of discharges with a diagnosis of alcoholic liver disease increased by 221% since 1995, to 90.8 per 100,000 persons, with the increase most pronounced among those aged 15–34 years (and those aged 65+). [104] Of all discharges with a diagnosis of alcoholic liver disease, 8.4% died while in hospital.

Harm also extends into the criminal justice system. In 2022 the Health Research Board analysed alcohol and other drug use among children and young people in Ireland. The HRB overview also examined Garda PULSE data and found that 14% of drink-driving arrests, 30% of drug-driving arrests, and 43% of controlled-drug-offences arrests were of young people aged 18-24 years. [105] While data from the Road Safety Authority indicated that one-half (49%) of young driver fatalities during 2013–2017, with a toxicology result available, were positive for alcohol.[106]

These are the harms which public policy measures try to mitigate and protect against – and limited advertising protections are one such measure. That is why this issue is so serious.

World Health Organisation’s ‘Best Buys’ are policy solutions that are highly cost-effective, evidence-based, and yield a significant return on investment for governments to adopt



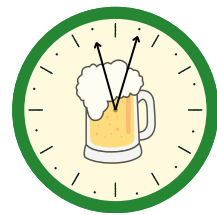
Increase excise taxes on alcoholic beverages

**PRICE**



Enact and enforce bans or comprehensive restrictions on exposure to alcohol advertising (across multiple types of media)

**MARKETING**



Enact and enforce restrictions on the physical availability of retailed alcohol (via reduced hours of sale)

**AVAILABILITY**

## How to protect children and young people

This document has laid out much of the national and international research on the marketing of alcohol to children and young people through sport. While many of the techniques discussed are relevant to other products, the reason they are so dangerous when applied to alcohol is because it is no ordinary product – it is a depressant drug with significant health implications for those who use it, especially children and young people. [107]

Alcohol use is a risk factors contributing to child and adolescent drinking and leading to various harms such as illness, injury, crime, and accidents, amongst others; however, this can be averted through interventions and policies that reduce alcohol consumption.

The WHO has identified the following priority actions for alcohol policy in its so called – Best Buys [108] – as the foremost measures to reduce alcohol harm. These are:

- Pricing to help regulate demand for alcoholic beverages
- Restrictions or bans on alcohol advertising
- Restrictions on the availability of alcoholic beverages

Essentially, the WHO contends that interventions on affordability, advertising, and availability are the most effective public policy measures that governments can take to offset at least some of the harm caused by alcohol.

In Ireland, the PHAA began the state's journey in implementing some of the WHO's best buys. It was this approach which underpinned some modest controls on advertising to protect children from exposure to alcohol marketing. However, as we have seen, these protections are being circumvented, and other parts of the legislation is still not fully implemented with important measures such as controls on the content of alcohol advertisements not yet introduced.

In addition, there is a clear need for a coherent approach to alcohol marketing to children and teenagers, including a clearly defined goal to protect children and young people offline and online. This includes protecting children at, and watching, sport through a complete ban on sports sponsorship by alcohol companies. This policy objective was originally proposed in the Steering Group Report on a National Substance Misuse Strategy which laid the foundations for the PHAA.[109] Due to intense lobbying, a ban on sports sponsorship was dropped – the only recommendation of the steering group not to make it into the 2018 legislation.[110] That mistake must be rectified.

Finally, through strong regulation and enforcement, as well as tackling the manufactured relationship linking alcohol and sport by tackling the mechanisms deployed by the alcohol industry to create and sustain this link, we can keep children and young people safe from the malign impact of alcohol advertising.

## Recommendations

- Prohibit the marketing of zero-alcohol drinks to children and in the spaces designated by PHAA as children's environments. This will require legislation to make explicit what was already implicit in the Public Health (Alcohol) Act 2018.
- Ban brand sharing, alibi marketing, and surrogate marketing – i.e. advertising that associates zero-alcohol products with the full-strength brands. This is in place in Norway.[111]
- Develop regulations around the sale of zero-alcohol products, especially clarity in relation of sales to children.
- Monitor the consumption of these products and impact on aggregated alcohol consumption to understand the public health implications of zero-alcohol products.

## Conclusion

It is clear from the evidence the alcohol industry's promotion of zero alcohol products represents a sophisticated and deliberate effort to circumvent the child protection measures in the PHAA and maintain alcohol brand visibility.

Despite the modest but hard-won protections introduced by that legislation, brand sharing and surrogate marketing have created a significant regulatory gap that is being actively and systematically exploited.

As this policy report has shown, children don't distinguish between zero alcohol and full-strength alcohol branding, and it is clear the industry knows this. Moreover, the sharp increase in alcohol consumption among young people in Ireland over the past decade, combined with compelling evidence that exposure to alcohol marketing drives youth drinking, makes inaction a political necessity and health protection must.

Protecting children and young people from alcohol harm must remain a priority, and that protection must extend fully to zero alcohol marketing.

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