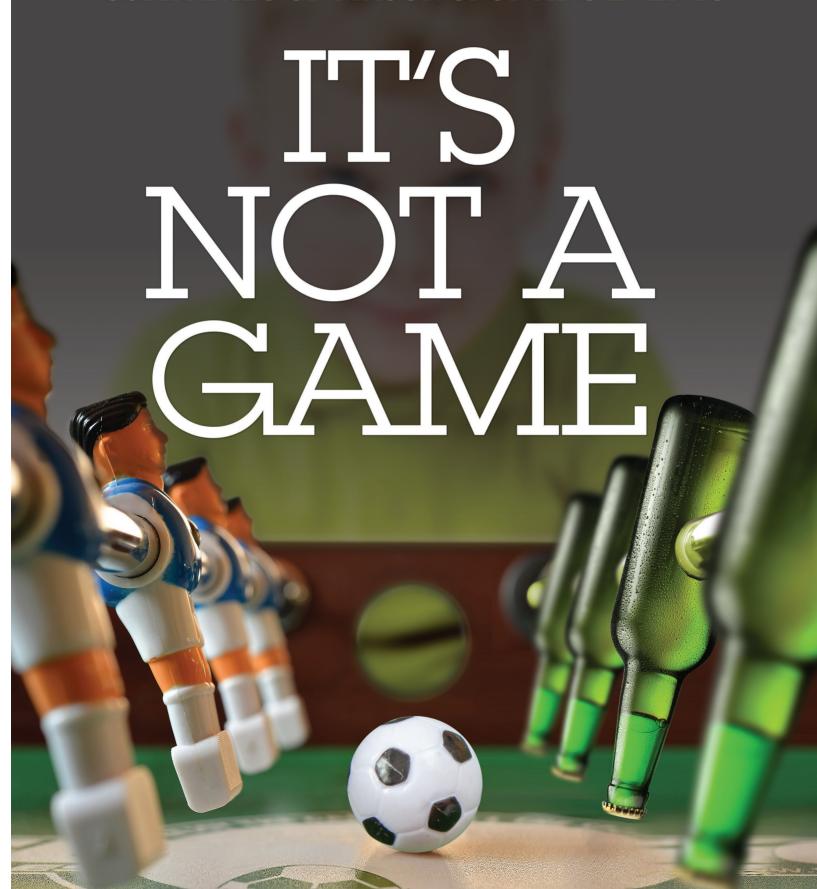


SUBMISSION TO THE WORKING GROUP ON REGULATING SPONSORSHIP BY ALCOHOL COMPANIES OF MAJOR SPORTING EVENTS



OVERVIEW



The Cabinet endorses Healthy Ireland, March 2013

Alcohol sponsorship of sport is the keystone for a wide range of alcohol marketing activity in Ireland. An array of marketing activities are used to leverage the link between alcohol, sports and elite athletes, which ultimately drives consumption of alcohol. Advertising "activates" the sports sponsorship to increase sales.

A ban on alcohol sponsorship of sport would decelerate the relentless promotion of alcohol in Ireland and diminish the overall potency of alcohol advertising, thereby reducing alcohol consumption. The purpose of marketing is to create a need or desire for a product. 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 and expand that market.

While the Alcohol Beverage Federation of Ireland (ABFI) claims that "there is no link between sponsorship and alcohol consumption", Diageo, sponsor of Irish rugby and the Gaelic Athletic Association (GAA), attributes sales increases directly to sports sponsorship activity in its most recent annual report and Carlsberg, sponsor of the FAI, in its most recent annual report, says that "ultimately, sponsorships are about growing our business and driving the long-term sales of our beer brands". (3)

There is clearly one message for policy-makers and another for shareholders, but it is the latter whose interests the alcohol industry is working for and protecting. Our legislators must do the same for the public health.

To suggest that sports sponsorship is not linked to sales of alcohol or has no influence on the beliefs and drinking behaviour of Irish people, particularly children and young people, not only lacks evidence and credibility, it also flies in the face of logic and common sense. Alcohol sponsorship of sport works in terms of increasing sales and, as a result, alcohol consumption. If it didn't, the alcohol industry simply would not spend so much money on it.

Pairing a healthy activity, such as sport, with an unhealthy product, such as alcohol, makes that product seem less unhealthy and more acceptable and normal. It creates a culture where children and young people perceive alcohol consumption as a normal everyday part of life and see it as something associated with having fun and sporting success.

It is entirely contradictory that a society with the second highest level of binge drinking in the world⁽⁴⁾ and where three people die every day from an alcohol-related illness⁽⁵⁾ is supine with regard to this aspect of alcohol promotion.

The Cabinet has endorsed the Healthy Ireland strategy, which stresses the need "to ensure that health is an integral part of all relevant policy areas, including environment, social and economic policies" – capitulating to the alcohol industry on the issue of alcohol sponsorship of sport completely undermines the credibility of this endorsement and the strategy itself.

The legal age for purchasing alcohol is 18 for very good reasons. Alcohol use is a serious risk to children and young people's health and well-being, due largely to the fact that they are more vulnerable to the effects of alcohol than adults as their bodies and brains are still developing. There is nothing to be gained by blaming children and young people, who are, in many ways, a product of their environment when it comes to alcohol consumption. We have allowed an environment to be created for them that is saturated with alcohol, particularly with regard to the healthiest of activities they can enjoy, such as sport.

It is vital that we legislate comprehensively to regulate the promotion of alcohol including a ban on alcohol sponsorship of sport, which is a powerful and sophisticated influence on young people's drinking behaviour and expectations, increasing the likelihood that they will start to use alcohol at an earlier age and to drink more if they are already using alcohol. It is not just supported by the evidence, it is the right thing to do.

Sports Sponsorship – A Key Part Of The Alcohol Marketing Mix

Sports sponsorship can be distinguished from other advertising and marketing activities, but as a potent accelerant in an integrated alcohol marketing mix it is very rarely used in isolation.

This means that when looking at the impact of sports sponsorship alone it is difficult to 'control' for the many other forms of alcohol marketing, both related and unrelated to sports, as well as the other influences on our drinking behaviour, to which we are exposed on a daily basis.

However, it should also be noted that implementing a ban on alcohol sponsorship of sport, while being examined in isolation by the Working Group, is just one of over 40 recommendations contained in the Steering Group Report on the National Substance Misuse Strategy and is therefore part of an overall plan to tackle a complex and multifaceted problem.

I present these recommendations as a whole, very much in the hope that they will be adopted as Government policy. While in many areas individual measures might have been recommended that would go further, I regard the overall set of recommendations as reasonable and pragmatic, and I hope that they will help to significantly and positively alter Ireland's relationship with alcohol. It is my strong belief that these recommendations, taken together, provide a practical, pragmatic means to achieve this.

Dr Tony Holohan, Chief Medical Officer and Chairman to the Steering Group.⁽⁷⁾

Just as sports sponsorship is never used in isolation by alcohol companies, a ban on alcohol sponsorship of sports would work in tandem with and reinforce the other measures proposed as part of the *Public Health (Alcohol) Bill*. (8) not in isolation.

What is clear is that alcohol sponsorship of sports is one of the most powerful components of an integrated marketing plan. Sponsorship aligns the values and integrity of a product with the event or activity they sponsor. In the context of sport, by applying their name to a team, individual or tournament, the sponsor aims to imbue its product with the unique and aspirational aspects of the event, thereby appealing to the target market to whom they wish to sell their products.

Sporting organisations, by accepting alcohol sponsorship effectively authorise "some of its reservoir of both property attributes and fans' emotional capital to be transferred to the sponsor. In crude terms the company says, "We want our brand to have this set of image attributes that you possess.' The sport event says, "We will convey that set of image attributes to you for a price." ("9")





Ireland rugby international Jamie Heaslip featuring in the Guinness "Made of More" campaign. Source: http://bit.ly/lrObAlE

Sponsorship activation' carried out by the sponsor then uses a wide range of online and offline advertising, sales promotion and PR techniques to leverage this sponsorship to deliver tangible benefits to the sponsor, particularly an increase in sales. Sporting endeavour at the highest level reflects some of those things to which many people aspire and identify with; talent, courage, fame, charisma, national pride and admiration. The emotional connection many sports fams feel to their club, county or country extends to those who 'support' or 'partner' their endeavours.

Sponsorship clearly differs greatly from, let's say, traditional print advertising. It enables communication in a very different way as sponsoring focuses on a better defined target group, in a better-controlled environment and usually without the presence of direct competition. It also allows far more emotionally-charged communications than the general marketplace.

Professor Dominique Turpin⁽¹⁰⁾

This emotional and aspirational aspect of sponsorship is what distinguishes it from advertising; I may not be as talented as A.N. Other but I can wear the same shoes, drive the same car and drink the same beer. This alignment between aspiration and product drives consumption. Although a key part of the marketing mix – sponsorship differs from advertising in that it enables the integrity and authenticity of

the sport to be transferred to the brand in a subtle and subliminal manner. Integrity and authenticity are key ingredients in developing a brand which appeals to a target audience and this is where sponsorship delivers far greater impact.

Sports sponsorship activation is a way of leveraging corporate sponsors' investments in sports properties. Corporate sponsors form strategic alliances with sports properties primarily for the purpose of marketing goods and services. The goodwill value of these properties and the ability of sponsors to leverage this value for commercial gain are what drive corporate sponsorships.

Anne Wall, Navigate With Purpose.(11)

Brands are quick to capitalise on the success of teams and individual sportspeople – we often see the congratulatory ads appearing in newspapers the day following a particularly significant success, immediately aligning their product with sporting success and all that sporting success brings in its wake; popularity, fame, social and romantic success.

These are key product alignments and enable psychological links to be made between consumer and product more easily than in traditional alcohol advertising media, such as television or magazine adverts. This creates brand differentiation and crucially drives demand. Return on investment (ROI) is critical to all commercial organisations and the key metric is

profitability, which is driven by sales. It is notable also that this consultation does not request details of the metrics by which the objectives of a sponsorship programme are measured, even though they are widely used in business to quantify return on investment.⁽¹²⁾

The Evidence Base

It has now been established beyond all reasonable doubt that alcohol marketing, including sports sponsorship, does influence drinking behaviour. A number of systematic reviews demonstrate that alcohol marketing encourages children and young people to drink at an earlier age and in greater quantities than they otherwise would.

The Science Committee of the European Alcohol and Health Forum conducted a review of 13 longitudinal studies that investigated the impact of marketing communications on initiation and continuation of alcohol use amongst 38,000 young people aged 10 to 21-years-old across four countries (The United States, New Zealand, Belgium and Germany). The Committee concluded 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." (13)

Their findings are consistent with the conclusions of three other systematic reviews examining the same issue.

Anderson et al conducted a similarly extensive review and concluded that,

"Longitudinal studies consistently suggest that exposure to media and commercial

that exposure to media and commercial communications on alcohol is associated with the likelihood that adolescents will start to drink alcohol, and with increased drinking amongst baseline drinkers.

Based on the strength of this association, 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."(14)

Meier et al carried out an investigation into the effects of pricing and promotion on alcohol consumption and related harm in the UK, a study commissioned through the Department of Health.

They found that "regardless of their explicit intention there is evidence for an effect of alcohol advertisements on underage drinkers. Consistent with this, evidence suggests that exposure to such interventions as TV, music videos and billboards, which contain alcohol advertisements, predicts onset of youth drinking and increased drinking. As a consequence one may conclude that restricting the volume of advertisements and merchandising is likely to reduce consumption and subsequent harm." (15)

Smith and Foxcroft reviewed seven lonaitudinal studies that followed up more than 13,000 young people aged 10 to 26-years-old. They found that, "The data from these studies suggest that exposure to alcohol advertising in young people influences their subsequent drinking behaviour. The effect was consistent across studies, a temporal relationship between exposure and drinking initiation was shown, and a dose response between amount of exposure and frequency of drinking was clearly demonstrated in three studies. It is certainly plausible that advertising would have an effect on youth consumer behaviour, as has been shown for tobacco and food marketing."(16)

The relationship between alcohol sponsorship of sports alone and alcohol consumption, while a more challenging exercise, has also been demonstrated to be causal.

A study published in 2012 by the Alcohol Measures for Public Health Research Alliance (AMPHORA) on the impact of European alcohol marketing exposure on youth alcohol expectancies and youth drinking investigated associations between alcohol-branded sport sponsorship exposure and drinking among over 6,600 adolescents with an average age of almost 14-years-old in Germany, Italy, the Netherlands and Poland. It found that, "the frequency of exposure to alcohol-branded sport sponsorship was shown to influence underage adolescents' alcohol expectancies as well as their drinking behaviour". (17)

Overall, adolescents expect, due to alcoholbranded sport sponsorship, that alcohol will make them feel positive, activated and sedated or experience less negative effects from using alcohol. Furthermore, alcoholbranded sport sponsorship was found to also influence alcohol use. Seeing more alcohol-branded sport sponsorship increases the likelihood that adolescents (start to) drink and increases the frequency of using alcohol. The latter effect is mediated by adolescents' alcohol expectancies.

When adolescents expect that alcohol will make them feel less negative, more positive, aroused and relaxed because of alcohol-branded sport sponsorship, they are more likely to drink alcohol more frequently.

Report on the impact of European alcohol marketing exposure on youth alcohol expectancies and youth drinking

Alcohol in the European Union, published by the World Health Organisation (WHO) in 2012, states that "exposure to alcohol marketing increases the likelihood that young people start to drink alcohol, and that among young people who have started to use alcohol, such exposure increases the frequency of drinking and the amount of alcohol consumed."(18)

The findings of the major systematic reviews continue to be confirmed by emerging studies on the now well-established link between exposure to alcohol marketing and the age at which children first drink alcohol and how much alcohol they consume.

In the European Action Plan to reduce Harmful use of Alcohol 2012-2020, the WHO warns that "the extent and breadth of commercial communications on alcohol and their impact, particularly on young people's drinking, should not be underestimated.

There are many ways to limit exposure to commercial communications, ranging from avoiding the use of humour and glamour and other youth-appealing aspects, to avoiding sponsorship and television and cinema advertising, all the way up to a complete ban." (19)

This is particularly relevant to Ireland, where a culture of binge drinking and drunkenness – as opposed to simply drinking alcohol – has effectively become normalised and we have the second highest levels of binge drinking in the world. (20) Young people also begin to drink alcohol at a younger age now than previous generations. (21)

The British Medical Association report Under the Influence - the Damaging Effect of Alcohol Marketing on Young People said "the fact that promotion is allowed, ubiquitous and heavily linked to mainstream cultural phenomena, communicates a legitimacy and status to alcohol that belies the harms associated with its use. It also severely limits the effectiveness of any public health message."(22)

Alcohol promotion therefore influences social norms, and there is substantial evidence that these in turn influence young people's relationship with alcohol. The more common and acceptable young people think drinking is, both in society as a whole and among their peers, the more likely they are to be a drinker and the greater quantities of alcohol they are likely to consume.

Under the Influence - the Damaging Effect of Alcohol Marketing on Young People.

Children And Young People's Exposure To Alcohol Marketing In Ireland

Sponsorship and advertising by beer companies promotes the image that beer is not very different from soft drinks, and its negative consequences such as traffic deaths, domestic violence, physical deterioration from cirrhosis, hypertension and stroke, and pregnancy risks are ignored. Alcohol sponsorship aspires to create positive brand image transfer associated with sport teams and athletes: vitality, fitness, fun, health, endurance, speed and strength. It has been observed that "beer comes to share the lustre of healthy athleticism".

Professor John L. Crompton. (9)



Heineken branding features prominently during the action in a Heineken Cup clash. Source: http://bit.ly/lrMkNYa

Young Irish people are exposed to a huge amount of alcohol marketing, of which sports sponsorship is a key part. Every day, in numerous ways and through numerous media, children and young people are continuously exposed to positive, risk-free images of alcohol and its use.

Due to the lack of effective regulations and legislation, young people are poorly protected from these sophisticated and powerful influences on their drinking behaviour and expectations.

Research commissioned by Alcohol Action Ireland from the National University of Ireland, Galway – and carried out last year - measured the exposure of 13 to 17-year-olds to alcohol marketing, including the intensity and type of marketing exposure, as well as their drinking behaviours and intentions. Some of the main findings from this research (which is due to be published shortly) are that:

- 91% of children were exposed to offline alcohol marketing and 77% to online alcohol marketing on the days they kept an alcohol marketing diary
- 61% of children reported owning alcohol branded merchandise
- 35% of children were invited to "like" an alcohol brand on Facebook, 30% had been invited to "like" an event sponsored by an alcohol brand, and 21% had been invited to go to an event sponsored by

- an alcohol brand
- Children who engaged with alcohol marketing and owned alcohol branded merchandise, such as jerseys sponsored by alcohol companies, are twice as likely to report drinking alcohol, binge drinking, drunkenness and an intention to drink
- Children exposed to online alcohol marketing are significantly more likely to report that they intend to drink alcohol in the next year

Alcohol Action Ireland's "Have We Bottled It?" survey found that among 16 to 21-year-olds, alcohol advertisements represented five out of their top ten favourite ads. Among the younger 16 to 17-year old age group, one in three said they had seen an ad or pop-up for an alcohol product on their social networking page, while one in five said they had received an online quiz about alcohol or drinking.⁽²³⁾

The National Youth Council of Ireland's study Get 'em Young: Mapping young people's exposure to alcohol marketing in Ireland, states that "alcohol sports sponsorship links masculinity, alcohol and sport and embeds alcoholic products into the everyday life of the consumer. It reaches the target audience – young males who are the keenest sports fans and heaviest drinkers." (24)

It is clear from this initial research that young people in Ireland are exposed to alcohol marketing through a variety of channels on a regular basis and can be described as pervasive. Despite the pre-vetting system for all alcohol advertisements, established by the drinking industry in Ireland in 2003, young people continue to find alcohol advertisements appealing, with humour the most important element. Equally the introduction of audience profiling for the placement of alcohol advertisements by the drinks industry does not appear to have protected young people, given the range of alcohol advertising and promotion practices that young people documented.

Get 'em Young: Mapping young people's exposure to alcohol marketing in Ireland

A study on *The Impact of Alcohol Advertising on Teenagers in Ireland*, commissioned by the Department of Health and Children, found that "the overwhelmingly positive response of the participants to alcohol advertising is an indication of the potential role that advertising plays in setting the context for the drinking behaviour of Irish young people". (25)

Irish young people and children continue to be bombarded with positive images of alcohol on a daily basis. In effect, the alcohol industry therefore becomes a child's primary educator on alcohol, with the associations with healthy activities such as sport greatly aiding this miseducation.

To say, as the alcohol industry does, that children and young people are not influenced by alcohol marketing – whether directly targeted or not - is equivalent to saying that young people suddenly begin to see and hear on their 18th birthday.

A survey of 10 and 11-year-old children in Wales by Alcohol Concern found that primary school children can readily identify alcohol company brands and logos, as well as characters from alcohol television adverts. (26) The number of children in the study who were able to identify alcohol branding is comparable to, and in some cases greater than those who recognised branding for products known to appeal to children, such as ice cream and cake (E.g. Nearly four fifths of pupils (79%) were aware Carlsberg is an alcoholic drink.

This was higher than recognition of Ben and Jerry's ice cream (74%) and Mr Kipling cakes (41%) as types of food.

The impact of alcohol marketing, including sponsorship and advertising, on the beliefs and behaviour of Irish children is clearly not lost on the very same sporting organisations accepting alcohol sponsorship.



The IRFU Child Welfare Policy Document warns that alcohol advertising can be misleading for children and make awareness of the pitfalls of alcohol consumption difficult. Source: http://bit.ly/lujaxo4

Alcohol and alcohol advertising is part of everyday life. Young people are not only influenced by trends and peer pressures but are also exposed to constant alcohol advertising. These advertisements seek to make the consumption of alcohol acceptable and trendy and therefore making the awareness of the pitfalls of alcohol consumption more difficult. Adults should

IRFU's child welfare policy document

ensure young people are aware of the

dangers of alcohol abuse.(27)

Despite the heavy promotion (and consumption) of alcohol products at rugby matches attended (and watched on television) by many children and young people, the IRFU's Child Welfare Policy Document also states: "It is a priority to ensure that the culture and practices on premises associated with rugby and to which Age Grade Players are exposed will prevent and discourage alcohol abuse."

The exposure to alcohol marketing through sports will come into sharp focus again with the FIFA soccer World Cup, which will be watched on Irish television by a huge number of children and young people.

Alcohol Concern found that millions of English children were subjected to alcohol marketing during coverage of the 2010 World Cup on ITV⁽²⁸⁾, while a recent analysis of "Alcohol Marketing in Televised English Professional Football" found that visual alcohol references in televised top-class English football matches occur at an average of nearly two per minute. (29)

An analysis of games broadcast during EURO 2012 found more than one visual reference to alcohol per minute. (30)

It should be noted that, despite the constant claims from the alcohol industry that sponsorship is not related to alcohol consumption, FIFA insisted that beer must be sold at all venues hosting all World Cup matches, despite the fact that alcoholic drinks are currently banned at Brazilian stadiums to prevent violence. (31) Budweiser is a major sponsor of the World Cup.

Alcoholic drinks are part of the FIFA World Cup, so we're going to have them. Excuse me if I sound a bit arrogant but that's something we won't negotiate. The fact that we have the right to sell beer has to be a part of the law.

FIFA General Secretary Jerome Valcke.

The first Strategic Task Force on Alcohol report was published one month before the 2002 FIFA World Cup and the industry was anticipating a sponsorship ban then. This issue has been on the agenda for at least 12 years and legislation is long overdue.



Budweiser are one of the main sponsors of the FIFA 2014 World Cup. Source: http://bit.ly/lrMl6Co

The Burden Of Proof

The Government's Special Rapporteur on Child Protection, Dr Geoffrey Shannon, has repeatedly called for the introduction of a ban on alcohol sponsorship of sporting events. Speaking as he presented his annual report to the Oireachtas Joint Committee on Health and Children in November 2013, Dr Shannon said the prevalence of alcohol abuse was one of the most striking features of all the cases he had reviewed involving children who had died in the care of the State. (32)

Dr Shannon's call for a ban on alcohol sponsorship of sports is backed by all the country's leading medical representative organisations, including the Royal College of Physicians of Ireland, the Irish Medical Organisation and the College of Psychiatrists of Ireland. (33-35)

The medical and public health experts in Ireland are all agreed on this issue and their expertise and evidence is challenged by vested interests with no medical or public health expertise. These vested interests can also provide no evidence that alcohol sponsorship does not influence alcohol consumption, particularly among children and young people.

It should be noted that the burden of proof in this process, as reflected by the Working Group's "Questions for Consideration", also seems to fall entirely with those seeking to protect and improve public health. It does not seem to have been considered that there should be a demand for evidence in the opposite direction.

Perhaps this is because neither the alcohol industry, nor those in receipt of its sponsorship, can provide such evidence and instead simply try to deny the significant body of evidence that supports the case of the medical and public health experts.

Driving Alcohol Consumption Through Sponsorship Of Sport

As well as failing to provide evidence that exposure to alcohol sponsorship of sport does not influence alcohol consumption, the alcohol industry also refuses to provide details of the return on its investment from

its many sports sponsorship deals, merely claiming – again without evidence – that sponsorship does not influence alcohol consumption, but influences drinkers to choose one brand over another. (1) The same claim has been made by sporting organisations in receipt of alcohol sponsorship. (36)

In its 2012 annual report, Diageo says that "sponsorship also plays an important role in Diageo's brand marketing and commercial profile." It also directly attributes a campaign tapping into "the fervent love of football" in Africa to driving sales of Guinness. (37)

The Guinness Football Challenge entered its second year, connecting deeply with African consumers by tapping into their fervent love of football. This innovative campaign is centred around an engaging weekly TV game show where contestants compete in a number of football challenges for a jackpot prize. Digital platforms enable mass consumer participation and a national consumer promotion directly linked between the TV show and the pack effectively drive sales of Guinness.

Diageo Annual Report 2012.

Diageo's highlights for the Asia-Pacific region in its 2013 annual report include the fact that "Johnnie Walker Black Label net sales increased over 40%, driven by the Formula 1 sponsorship programme, along with the 'Step Inside the Circuit' campaign."⁽²⁾

In its 2013 annual report, Diageo also says that, in East Africa, "Tusker net sales were up 13% largely because of favourable price/mix, and volume also grew due to strong marketing support through soccer sponsorships and the 'It's Our Time' campaign."⁽²⁾

Carlsberg, sponsor of the FAI, says in its 2013 annual report that: "There are compelling business reasons why sponsorships play an important and integral part in the Group's marketing activities. Ultimately, sponsorships are about growing our business and driving the long-term sales of our beer brands." (3)



"The Guinness Football Challenge" used "the fervent love of football" to drive sales for Diageo in Africa. Source: http://bit.ly/lrMlcKi

The CEO of Anheuser-Busch "identified four priorities in the company's quest to enhance profits by increasing overall consumption and sales: improve the image and desirability of beer; keep beer fun and social; increase beer occasions; and improve retail sales. Sponsorship of sports fits well with all four of these strategies and so has become the company's primary promotional tool in most of its markets." (9)

The industry is fighting to retain its sponsorship of sports purely because it impacts directly on the "bottom line". As Heineken notes in its 2013 annual report "alcohol abuse remains a serious concern in many markets and prompts regulators to take further restrictive measures including restrictions and/or bans on advertising and marketing, sponsorship, point-of-sale, and increased taxes leading to lower revenues and profit."⁽³⁸⁾ The specific risks listed by Heineken include "Increased restrictions on commercial freedoms".

As part of its 2009 investigation into the conduct of the UK alcohol industry, the House of Commons Health Select Committee obtained access to internal marketing documents from both producers and their advertising agencies. This gave us a rare insight into what really happens behind closed doors, as opposed to what is proffered by the alcohol industry. The documents revealed a clear focus on category sales and increasing consumption, while sponsorship also emerges as a key strategy for the promotion of alcohol.

Among the main findings in the analysis by

Professor Gerard Hastings were that young people are a key target for the alcohol advertisers. (39)

Whilst for the most part the documents refer to this group as starting at the LDA (legal drinking age, i.e. 18), this distinction is lost on a number of occasions. Thus market research data on 15 and 16 year olds is used to guide campaign development and deployment, and there is a clear acknowledgement that particular products appeal to children (Lambrini for instance is referred to as a "kids' drink"). Many references are made to the need to recruit new drinkers and establish their loyalty to a particular brand: WKD, for instance, wants to attract "new 18 year old lads" and Carling takes a particular interest in becoming "the first choice for the festival virgin", offering them free branded tents and a breakfast can of beer ("a great way to start the day"). Campaigns aspire to be associated with and appeal to youth.

"They'll drink bucket loads of the stuff": an analysis of internal alcohol industry advertising documents.

The internal documents secured by the House of Commons Health Select Committee also showed that producers are well aware that segments of their market do drink irresponsibly. Professor Hastings points out that "far from regretting or avoiding any promotion of this behaviour as the codes require, producers and agencies analyse it for market opportunities."



A Sky Sports promotion made available through purchases of Carling product. Source: http://bit.ly/lujb4Xj

There is also a clear desire to increase the amount being drunk. Professor Hastings notes that, "debates about advertising inevitably raise the question about whether effects are limited to brand share or affect consumption in general: is the main effect of alcohol marketing to encourage brand share and switching, or does it also expand the market and increase per capita consumption? The documents suggest that alcohol producers seek to do both with their advertising. The industry's interest in young people and recruiting the next generation to alcohol, as discussed in Section 1, speaks to a faith in its capacity to grow the market. This hope is encapsulated in the title of the Smirnoff document 'Introducing next generation growth for vodka in the On-Trade'.

The alcohol industry's internal documents are also full of references to brands suggesting that alcohol can enhance the social success of either an individual or an event. In terms of sponsorship, Professor Hastings notes that, "It is a way of raising brand awareness, creating positive brand attitudes and building emotional connections with consumers. Its power comes not from direct advertising messages but through associating the brand with an already engaging event or celebrity, and gaining power and credibility in the process".

A Carling document again sums this up very neatly when discussing its music sponsorship campaign: "Ultimately, the band are the heroes at the venue and Carling should use them to 'piggy back' and engage customers' emotions". Although the codes prohibit any link between alcohol and youth culture or sporting achievement, the documents discuss in detail sponsorship deals with football, lad magazines and music festivals.

Often the intent of such sponsorship is specifically to reach the young: Carling's sponsorship of the Carling Cup Final is a way to "recruit young male (LDA-21) drinkers into the brand", and, as noted above, it sponsors music festivals which appeal to "festival virgins". Events are chosen to demonstrate how well the brand understands and relates to young people: as one Carling executive expresses it, "They (young men) think about 4 things, we brew 1 and sponsor 2 of them".

"They'll drink bucket loads of the stuff": an analysis of internal alcohol industry advertising documents.

It should be noted that an analysis of internal documents from advertising agencies working for tobacco companies

in the UK also exposed as highly disingenuous the tobacco industry argument – now replicated by the alcohol industry - that marketing, including advertising and sponsorship, is only about expanding or protecting brand share, not total consumption. (40)

The Impact Of Alcohol Sponsorship On Sportspeople

Alcohol sponsorship of sports has an impact not only on the drinking behaviour of those attending or watching the games, but also on those participating in them. Dr Kerry O'Brien has found that alcohol industry sponsorship of sportspeople, and in particular the provision of free or discounted alcoholic beverages, is associated with hazardous drinking. The authors recommended that sports administration bodies should consider the health and ethical risks of accepting alcohol industry sponsorship. (41)

A further study to examine the relationship between direct alcohol and non-alcohol sponsorship and drinking in Australian sportspeople found that receipt of alcohol industry sponsorship was predictive of hazardous drinking. The authors recommended that governments should

consider alternatives to alcohol industry sponsorship of sport. (42)

A study published in recent months found that university students in the United Kingdom who play sport and who personally receive alcohol industry sponsorship or whose club or team receives alcohol industry sponsorship appear to have more problematic drinking behaviour than students who play sport and receive no alcohol industry sponsorship. (43)

Last November, Australia's rugby team came to Ireland to play in a "Guinness Series International", with the clash used to heavily promote alcohol. Yet, following a drinking session in the build-up to the match, six Australia players were banned for their following game with Scotland and nine more were warned about their behaviour. (44)

Everyone in our squad is required to comply with and adhere to high standards of ethical conduct both on and off the field. Those standards were compromised in the lead-up to Saturday's victory over Ireland with a group of players making the decision to stay out late and consume inappropriate levels of alcohol during the early hours of Wednesday morning.

Ewen McKenzie, Australian Coach. (45)



The GAA promoting their "Off The Booze, On The Ball" campaign. Source: http://bit.ly/lujbe0G

This not only reinforces how incompatible alcohol is with effective sporting performance, but the hypocrisy of using top class athletes to promote a product to the general public when the athletes themselves must actively avoid that product to ensure peak performance.

The athletes and sporting teams used to sell alcohol products through sports sponsorship are generally monitored and protected in highly regulated environments, unlike the many people the alcohol products are aimed at, who are repeatedly and enthusiastically encouraged to drink alcohol, which is linked to sporting success.

The GAA lists the effects of alcohol on sports performance as:

- Greater risk of muscle cramps
- Greater risk for injuries and complications
- Greater body heat loss
- Reduced endurance
- Slower reactions
- Dehydration
- Vitamin and Mineral Depletion
- Reduced aerobic performance
- Impairs muscle injury recovery

If you want to be the very best you can be at your sport, you'll have more of a chance of achieving that by not drinking alcohol - ${\rm GAA}.^{(46)}$

Clearly, at either amateur or professional level, alcohol and sports are not a healthy mix.

Saving Lives And Money.
The impact of a ban on alcohol sponsorship of sports for public health and the Exchequer

There is a danger of failing to see the big picture. In addition to making changes to pricing and availability in order to apply a brake on Ireland's runaway drinking, we must also take our foot off the accelerator, and alcohol promotion, via advertising and sponsorship is that accelerator.

Dr Bobby Smyth, Consultant Child and Adolescent Psychiatrist. (47)

Introducing a legislative ban on alcohol sponsorship of sport would have a significant positive impact on public health and, as a result, the Exchequer. The sports currently in receipt of the majority of alcohol sponsorship - rugby, soccer and Gaelic Games - are the sports typically played and watched by young people, particularly young men in the 15 to 29-years-old age category. This is because:

The peak beer consuming years are from 18 to 29, which are the peak years for sports' participants and spectators. Males in the 18–34 age group constitute only 20% of the beer drinking population, but they consume 70% of all beer. Breweries have sought tie-ins with sports because they provide a "macho" vehicle that appeals to their core young adult male target audience. These heavy users are the most critical market segment for beer companies and it is easy to communicate with them through sport associated events.

Professor John L. Crompton⁽⁹⁾

The WHO report that alcohol is responsible for one in every four deaths among these young men - making it the leading risk factor for death for young men - $^{(48)}$ and yet we continue to allow sports in Ireland to be a primary vehicle for the alcohol industry to target them.

Alcohol kills 1,200 Irish people per year (5) and there are 2,000 Irish people in hospital beds every day due to alcohol misuse (49). Alcohol increases people's risk of developing more than 200 diseases (4) and as it is not only the volume of alcohol consumed, but also the pattern of drinking over time that affects the risks of harm, a large amount of Irish people are putting themselves at risk of health harms due to their hazardous drinking patterns.

The alcohol industry continually refers to the "minority" who misuse alcohol in Ireland. This unfounded assertion doesn't just completely contradict the well-documented evidence which shows that the majority of Irish people who drink do so in a hazardous manner – seven out of ten men and four out of ten women⁽⁵⁰⁾ – but also the daily reality for the people of Ireland.

We have the second highest rate of binge drinking in the world, according to a recent WHO report⁽⁴⁾. While there has been a welcome reduction in Ireland's per capita alcohol consumption in recent years, following increases in excise duty, the WHO report shows that we are still drinking almost twice the global average of pure alcohol per year.⁽⁴⁾

Our levels of alcohol harm in Ireland are still unacceptably high. The projected number of new cases of alcohol-related cancers in Ireland is expected to double by the year 2020 for women and to increase by 81% for men during the same period⁽⁵¹⁾. The Royal College of Physicians of Ireland warned recently that liver disease rates are on course to quadruple in Ireland between 1995 and 2015, with the greatest level of increase among 15-to-34-year-olds.⁽⁵²⁾

The majority of these are young people who have been drinking heavily since their early to mid-teens. Alcohol use is a serious risk to children and young people's health and well-being, due largely to the fact that they are more vulnerable to the effects of alcohol than adults as their bodies and brains are still developing. They are also more vulnerable to the powerful and sophisticated messages of alcohol marketing.

Far from being a rite of passage, drinking alcohol may well serve to delay the development of vital coping skills, project young people into risky situations and lay the ground-work for future mental and physical health difficulties⁽⁵³⁾, with alcohol also a significant risk factor for self-harm and suicide in Ireland⁽⁵⁴⁾.

However, despite this, alcohol use continues to move further into childhood⁽²¹⁾ and there remains a consistent trend for drunkenness among young Irish people, a trend that sets them apart from the majority of their European counterparts.⁽⁵⁵⁾

However, the harm experienced by people due to their own drinking is only part of the story of alcoholrelated problems in Ireland and a comprehensive report from the HSE recently showed the extent to which alcohol harm not only affects the individual drinker, but also others around them, including family members, friends, co-workers and the wider community. (56) Alcohol consumption is a major driver of crime, including assaults and public order offences, and is one of the primary causes of child welfare and protection issues in Ireland.

Alcohol consumption in Ireland costs us an estimated €3.7 billion a year, (67) far higher than the Government's tax take on alcohol. At a time when we need to do more with less, it's worth remembering that these costs are avoidable costs.

Alcohol-related health and crime costs account for €2.4 billion of that total figure alone. Alcohol-related road accidents cost the state over €500 million each year and the impact of alcohol on output and employment runs to €197 million per annum. (57) Problem alcohol use also results in increased State spending on social welfare benefits for those unable to work.

A report commissioned from CJP Consultants by the Department of Health found last year that:

Although the alcohol industry makes a significant economic contribution to Ireland's economy, this is far outweighed by the direct and indirect costs that excessive consumption of alcohol imposes on the Irish economy and society⁽⁵⁸⁾

A ban on alcohol sponsorship of sports, as part of the *Public Health (Alcohol) Bill*, will help reduce alcohol-related harm, particularly among future generations, and have a hugely positive impact on the health, wellbeing and safety of the general population, as well as leading to significant savings for the State, particularly in relation to health and crime.

In short, it will help to save lives and money.

The Approach To Alcohol Sponsorship In Other Countries

Alcohol sponsorship of sports has been recognised as a risk to public health in many countries worldwide and countries that have banned it completely include France, Russia, Ukraine and Norway, while others, including South Africa and Australia, are making efforts to phase it

A WHO analysis of 167 countries found that nearly a quarter of reporting countries (24%) had a total or partial ban on beer company sponsorships of sporting events, while 11.4% relied on industry self-regulation, as Ireland does, and 64.6% had no regulation.⁽⁴⁾

Importantly, none of these countries that have introduced a ban on alcohol sponsorship of sports have done so in isolation, but as part of a range of measures dealing with alcohol marketing and advertising, as well as other key areas, such as pricing and availability, which can reduce alcohol consumption at population level and improve public health.

As pointed out earlier, this means that when looking at the impact of sports sponsorship alone it is difficult to 'control' for all the many other measures and societal factors, or secular trends, that can influence alcohol consumption over time. This is reflected clearly in the case of France, with the Loi Evin perhaps the most high-profile case of a ban on alcohol sponsorship of sports.

However, that's just one part of the Loi Evin, which can be summarised as follows: A clear definition of alcoholic drinks is given:

- All drinks over 1.2% alcohol by volume are considered as alcoholic beverages
- Places and media of authorised advertising are defined:
- No advertising should be targeted at voung people
- No advertising is allowed on TV and 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 degree, origin, composition, means of production, patterns of consumption
- A health message must be included on each advertisement to the effect that "l'abus d'alcool est dangereux pour la santé": alcohol abuse is dangerous for health⁽⁵⁹⁾

The Loi Evin was enacted in 1991 and since then French alcohol consumption has dropped dramatically. However, "the effect of the Loi Evin has been swamped by the general trend towards reduced alcohol consumption in France", which declined dramatically from 30 to 13 litres of pure alcohol per capita per year between 1960 and 2004, and has decreased marginally since then. (59)

The steep decline in French alcohol consumption can't be attributed directly to the Loi Evin, but it would also be wrong to claim that it has not played a role, just because it is "always difficult to assess the role of individual factors in the availability of alcohol, such as price, standard of living, number of sales outlets and advertising, especially as the role of these factors varies over time". (59) What we can say with certainty about the Loi Evin is that since it was enacted, French alcohol consumption has decreased significantly and French sport has thrived.

Recent alcohol industry claims in Ireland that a recent increase in binge drinking among French teenagers, allied with a decline in binge drinking among Irish teenagers, proves the Loi Evin hasn't worked are reductionist in the extreme and shows, once again, that the alcohol industry's words are at odds with its actions in the pursuit of profit. $^{(1)}$

Perhaps the greatest evidence of the strength of the Loi Evin is that, despite its claims in Ireland that the Loi Evin hasn't worked, "the alcohol industry has challenged the legal foundation of the Loi Evin over and over again. But until now it only seems to have proven the strength of the law."(60) There have been several unsuccessful challenges to the law at European level.

In 2004, the Advocate General of the European Court of Justice ruled that the "French legislation under examination does not go beyond what is necessary in order to attain the objective of protecting public health which it pursues". (61)

The case makes reference to the EU Directives banning advertising of tobacco and highlights the right of governments to restrict the free movement of services on the grounds of protecting public health. ⁽⁶¹⁾

Indeed, a study of the Loi Evin noted that:

Despite their reputation, public health experts do not wish to regulate peoples' lives and do not wish to treat them solely as consumers, unlike alcohol producers whose only wish is to impose consumption levels and are paradoxically the new 'norms givers'. On the contrary, the philosophy of the associations promoting prevention is to give citizens back their freedom of choice regarding products, consumption patterns and rituals and to prevent patterns and rituals to become bounds limiting freedom. (59)

Other countries, including Ireland, are now looking at following the lead of France and others who have prioritised the public health over the commercial interests of the alcohol industry. In Australia, 12 leading sporting organisations - covering athletes in soccer, basketball, netball, swimming, cycling, hockey and others - have recently agreed to end all existing and future alcohol sponsorship agreements as part of the "Be The Influence" strategy. (62)

In exchange, the groups will share \$25 million in replacement Government funding taken from new alcopops tax revenues. The pressure is now coming on the nation's biggest sports organisations - AFL, NRL and Cricket Australia – to sign up to the new programme. (62)

We urge the remaining sports such as AFL, NRL and cricket to start discussions with the government as to how they too can move away from their present role in exposing children to alcohol promotion.

Professor Mike Daube, co-chair of the National Alliance for Action on Alcohol. (62)

In South Africa, the established Inter-Ministerial Committee (IMC) reviewed extensive submissions and evidence on alcohol marketing and alcohol-related harm and then mandated the Minister of Health to draft legislation banning all advertising and sponsorships and other marketing on the basis of this evidence. The draft Bill was ratified by the Cabinet to be published for public comment for a period of three months. In addition a Regulatory Impact Assessment is being conducted on the impacts of this legislation. (4)

The IMC realise that combating alcoholrelated harm requires a range of measures rather than a single "silver bullet". Policies acting in conjunction with each other usually produce greater impact than the sum of the parts. For example raising the age of legal drinking, introducing a policy of zero tolerance for drinking and driving and introducing education campaigns against alcohol-related harm in schools while at the same time permitting the glamourisation and encouragement of alcohol through advertising is likely to have less impact on drinking behaviours, in both the short and longer term. It is realized that government should not give or permit mixed messages through commission or omission by neglecting to control marketing while introducing other

World Health Organisation Global status report on alcohol and health 2014.⁽⁴⁾

The Financial Value Of Alcohol Sponsorship

There is no definitive, accurate figure on the total amount of sponsorship provided to sporting organisations by the alcohol industry in Ireland and none has ever been provided. If the Working Group is, in particular, to "consider alternative sources of funding for sporting organisations to replace potential lost revenue" then surely the onus is on the alcohol industry to provide an accurate, detailed account of its various sponsorship deals with sporting organisations in Ireland and how much they are worth cumulatively.

Various estimations have been offered by the alcohol industry, with a report commissioned by the Drinks Industry Group of Ireland (DIGI) last year claiming that "It is conservatively estimated that drinks industry sponsorship of sporting events in 2012 amounted to approximately €35 million".(63)

Most estimates from the industry put the figure in excess of €30 million, none of which have ever been verified, and we learned from the sporting organisations in receipt of this sponsorship at the Joint Oireachtas Committee on Transport and Communications last year that these estimates all seem to greatly overestimate the likely true figure.

The IRFU Chief Executive told the Joint Oireachtas Committee that alcohol sponsorship was worth €9 million annually, from national to club level, to the IRFU. The FAI Chief Executive said their deal with their alcohol sponsor was worth "a significant" part of annual commercial revenue of €6

million. The Ard Stiúrthóir of the GAA, said there one remaining alcohol sponsor only accounts for a small percentage of GAA revenue (it is a "partner" of Croke Park and does not sponsor any competitions).⁽³⁶⁾

This puts the overall alcohol sponsorship revenue for the country's three largest sporting organisations at well under €20 million.

In a further hearing before the Committee on the same issue, the Chief Executive of Horse Racing Ireland said that alcohol sponsorship was worth in the region of €1 million annually to his organisation. (64) Elsewhere, DIGI said that total commercial race sponsorship provided by the alcohol industry in 2012 was €375,500, the fifth highest sectoral share. (63)

This means the four major sports in Ireland in receipt of alcohol funding are likely to receive less than €20 million annually and certainly far less than the oft-quoted figures in excess of €30 million, with other minority sports – the majority of whom do not receive alcohol sponsorship - certainly not bridging the gap.

Even if alcohol sponsorship were worth the greatly overestimated €35 million, it's worth noting this would still see alcohol sponsorship of sports worth less than 1% of the estimated €3.7 billion annual cost of alcohol-related harm to the State.⁽⁵⁷⁾



Ireland goalkeeper Shay Given featuring in a Carlsberg promotion, ahead of Euro 2012. Source: http://bit.ly/lujbsox

The Impact Of A Ban On Alcohol Sponsorship For Sports

At the Joint Oireachtas Committee on Transport and Communications hearing, the GAA, IRFU and FAI all clearly said they are not dependent on alcohol sponsorship, so there is absolutely no question over the viability of these or any other sporting organisations in Ireland in the absence of alcohol sponsorship. (36)

Concerns were expressed at the Committee hearings about sponsorship provided to local clubs. A survey by the Vintner's Federation of Ireland (VFI) last year found that almost half of its members sponsor local sports teams, with an estimated total annual spend of almost &3.5 million, primarily on local sports clubs.

However, this sponsorship would be unaffected by the current proposal to phase out alcohol sponsorship of sports, as it refers only to alcohol brands, not outlets which sell alcohol (e.g. pubs, hotels, supermarkets etc), similar to the existing ban on tobacco sponsorship of sporting events.

The proposal in the *Steering Group*Report on the National Substance Misuse
Strategy is not to ban alcohol sponsorship
immediately, but to phase it out over
several years.⁽⁷⁾

Therefore we believe that implementing α ban on alcohol sponsorship of sport is not only the right thing to do, but the proposal is also proportionate and allows sporting organisations time to seek sponsorship from alternative sources.

While claims have been made that a ban on alcohol sponsorship would impact on our ability to attract and host major international tournaments, (66) this is at odds with the evidence. France, since the implementation of the Loi Evin banned alcohol sponsorship of sports in 1991, has hosted both the soccer and rugby World Cups, in 1998 and 2007 respectively.

It should be noted that the Loi Evin made it impossible for the Anheuser Bush (through Budweiser) to sponsor the 1998 World Cup, despite heavy lobbying of the French government, but a new sponsor was found

in Casio.⁽⁵⁹⁾ Both World Cup tournaments were hugely successful and the rugby World Cup attracted record attendances and television viewing figures for the tournament.⁽⁶⁷⁾

The Loi Evin has also not hindered the participation of French clubs in the Heineken Cup – or the "H Cup", as it is known in France – the Champions League, or other major tournaments.

Alternative Sources Of Sponsorship

As an immediate ban on alcohol sponsorship of sport has not been sought, this means sporting organisations will be afforded ample time to secure sponsors from other sectors and this will happen in an improving sponsorship market, as the economy continues to recover. The argument has been made that there are no other sponsors out there to come in and take the place of alcohol brands. (36)

The exact same argument was made in relation to tobacco advertising and yet sport in Ireland has thrived in its absence, while smoking uptake rates among young Irish people have been significantly reduced (the percentage of children aged 10-17 who report never smoking has increased from 50.8% in 1998 to 73.5% in 2010),(68) as tobacco was tackled through a range of effective policy measures, including a ban on tobacco sponsorship of sports. Who would now question the decision to break that link? The GAA has shown the way forward in terms of attracting sponsors from other sectors and just last year struck a deal with Liberty Insurance, which replaced an alcohol beverage as one of three main sponsors of the All-Ireland Hurling Championship (joining Etihad and Centra), as well as becoming the principal sponsor of the Camogie Championship. There is now no GAA competition with an alcohol sponsor.

Clearly, if there is a will to move away from alcohol sponsorship, there is also a way, as evidenced by the recent deals secured by the GAA.

Other sporting organisations - who have more substantial alcohol sponsorship

deals - have also shown they can attract sponsors from other sectors. In May 2013, mobile phone network Three announced that they are to increase their sponsorship of the Irish soccer team and the FAI in a deal that will be worth an extra €4 million up to 2016. The principal sponsors of Ireland's four provincial rugby teams are now Bank of Ireland (Leinster, Munster and Ulster) and Mazda (Connacht).

We are undoubtedly still in a challenging financial environment, but the fact remains that the sporting organisations with alcohol sponsorship deals are responsible for some of the most popular and most watched activities in this country and, as a result, they will always have the ability to attract sponsors.

It would send a positive message for our economic recovery if confidence was publicly placed, through a report from the Department of the Taoiseach, in the capacity of Ireland's non-alcohol business sector to step up to bridge the gap.

In 2010, the Joint Committee on Tourism, Culture, Sport, Community and Gaeltacht Affairs, recommended that "as a matter of priority, the Government should examine the feasibility of phasing out, in as short a time as possible, alcohol sponsorship of sport. The problem is that this sponsorship provides valuable income for sporting organisations.

However, these organisations should be encouraged to seek sponsorship from alternative sources and so break the close association between sport and alcohol consumption. It should be remembered in this regard that Carrolls, a large cigarette company, originally sponsored the Gaelic Athletic Association's All-Star Awards but this sponsorship was successfully phased out."⁽⁶⁹⁾

Previously, the Joint Committee on Arts, Sport, Tourism, Community, Rural and Gaeltacht Affairs recommended "the sourcing of sponsorship for sport outside of the alcohol industry: the correlation between the onset of drinks sponsorship and the rapid rise in alcohol consumption in this country is too strong to be ignored." (70)



Liberty Insurance became a sponsor of the All-Ireland Hurling and Camogie Championships in 2013. Source: http://bit.ly/lujbywn

Other Funding Supports

The Steering Group Report on the National Substance Misuse Strategy recommends the introduction of a "social responsibility" levy through which the alcohol industry would "contribute to the cost of social marketing and awareness campaigns in relation to social and health harms caused by alcohol"(7)

It states that the levy "could also be used to contribute to the funding of sporting and other large public events that help provide alternatives to a drinking culture for young people". In this way, the alcohol industry could continue to contribute to sporting organisations without using them as a vehicle to further promote its products. The alcohol industry in Ireland is a hugely profitable one and even a very modest levy could go a long way towards not just funding sporting organisations, but helping to address some of the many social and health harms we currently experience as a result of alcohol consumption in Ireland.

Based on the latest per capita alcohol consumption figures for Ireland (10.73 litres of pure alcohol in 2013), a levy of just one cent per Irish standard drink (10 grammes of alcohol) would currently generate more than $\mbox{\ensuremath{\in}} 30$ million annually, well in excess of the alcohol industry's stated annual spend on sports sponsorship in Ireland.

The Way Forward

The measures we are hoping will be brought in in relation to breaking the link between sporting bodies and alcohol marketing are a crucial part of our response as a country. We have a big drinking problem in this country and many of our young people are storing up trouble for themselves and their families in the future. Sport is a very important part of our culture and long may it remain so - but let it not be dependent on alcohol money as now seems to be the case.

Professor Joe Barry, Public Health Specialist. (47)

The existing voluntary Code of Practice has completely failed to protect Irish people,

particularly children and young people, from the impact of the powerful and sophisticated influences of alcohol sponsorship of sports on their beliefs and behaviour in relation to alcohol. Trying to "beef up" this failed Code or place it on a statutory footing may seem like the easy option, but it will not address this important problem in any meaningful way. Using a Code devised by the alcohol industry as the basis for the regulation of alcohol harm from a public health perspective simply will not work.

Even to contemplate this, is just an ideological hangover from previous administrations, which allowed the non-expert, commercial interests of the alcohol industry to unduly influence public health policy, which has contributed to our currently unacceptably high levels of alcohol harm. We are citizens, not consumers and we live in a society, not an economy – a society where three people are dying every day due to alcohol.

The public health perspective prioritises the well-being of the citizen and must take priority over the alcohol industry perspective, which prioritises the shareholder. An inherent conflict of interest is created by attempting to shoehom public health objectives into industry-friendly structures.

This is currently nowhere better demonstrated than the alcohol industry's attempts to block the Scottish government's plans to implement minimum unit pricing. The alcohol industry has delayed the progress of this measure by years, by appealing and re-appealing until it has now reached European Court stage.

The alcohol industry will replicate this tactic in Ireland, where minimum unit pricing is a central plank of the proposed *Public Health* (*Alcohol*) *Bill*. To task the alcohol industry with setting 'standards' in one aspect of alcohol regulation, whilst they are legally challenging another complementary aspect of an integrated alcohol regulation plan is strategically incoherent and doomed to fail.

Undoubtedly some sporting organisations have become over-reliant on the alcohol industry. They must be proactively supported, not only to find commercial partners who deliver a net positive outcome for society as a whole, but also for the protection of the intrinsic merit of the sporting organisations themselves from the influence of commercial sponsors



AIG became the principal sponsor of Dublin GAA, Ladies Football and Camogie in 2013. Source: http://bit.ly/lrMlNeU

whose corporate values are ultimately misaligned with the ethos of sport. ⁽⁹⁾ Some sporting organisations have already made significant progress in this regard, proving that it can be done.

The Department of Health invested in extensive consultation, research and deliberation to produce the recommendations of the *Steering Group Report on the National Substance Misuse Strategy*, on which the alcohol industry were represented, and which contains the key evidence based measures to address alcohol related harms in Ireland.

The Steering Group's report should form the basis of the Working Group's decision on this important matter. The measures it outlines are meaningful and will deliver a positive impact for public health and also address the spiralling costs of alcohol harm.

These measures include that "drinks industry sponsorship of sport and other large public events in Ireland should be phased out through

legislation".⁽⁷⁾ The report also notes that "a majority of the Steering Group is in favour of stricter controls on alcohol marketing, primarily to protect children and young people. The Steering Group generally favours regulatory controls instead of codes as a means of protecting young people."⁽⁷⁾

A ban on alcohol brands' sponsorship of sports should be legislated for, with an implementation date of six years hence to allow alternative arrangements to be made by sporting organisations to replace sponsorship income. In the intervening period no further alcohol industry sponsorship of sport should be permitted.

This is the only meaningful step that can be taken in relation to alcohol sponsorship of sports to address the issue of alcohol harm. Anything less, is to deprioritise the health and wellbeing of Irish people.

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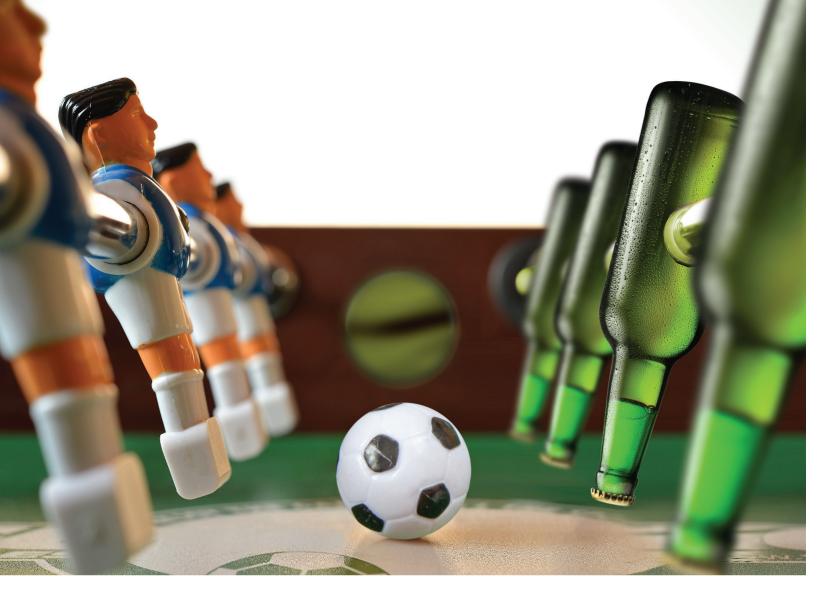
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