



AlcoholAction
Ireland

BAI Codes and Rules

Public Call for Comments
and Observations

DECEMBER 2022

Alcohol Action Ireland (AAI) is the national independent advocate working to reduce harm from alcohol.

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 public policy solutions with the potential to reduce that harm, with an emphasis on the implementation of the Public Health (Alcohol) Act.

AAI support the work of the HSE Alcohol Programme, informing strategic alcohol initiatives as an instrument of public health planning. AAI is a member of the Public Health Alcohol Research Group established by the Minister for Health in Ireland to advise on evaluation research.

We act as the secretariat to the Alcohol Health Alliance Ireland, as its co-founding member, and serve on the Board of Eurocare – European Alcohol Policy Alliance, Brussels.

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Ireland has a profoundly unhealthy relationship with alcohol, which is a psychoactive substance that has huge human and financial implications across society in Ireland.

This is no small part because of the tactics of an aggressive industry acting against the population's health through aggressive marketing, lobbying against effective public health measures and corporate social responsibility strategies that deflect attention from the harmful nature of the product.

It is therefore imperative that the State and all of its agencies act together to ensure that commercial interests do not trump public health measures. The evidence that marketing of alcohol drives consumption and is harmful to young people and other vulnerable communities is overwhelming. That's why the World Health Organization recommends a complete ban on alcohol marketing. In the absence of a complete ban, comprehensive regulations are required.

Evidence demonstrating the harmful nature of alcohol marketing is now comprehensive and well documented. There is no doubt that alcohol advertising to adults and children increases consumption.

Alcohol marketing saturates society with alcohol, creating ‘alcogenic’ spaces and perpetuating the social norm that alcohol is an ordinary product. Alcohol marketers mispresent alcohol as a safe product that brings happiness, success, friendship and more, with no apparent risks or side effects.

The ubiquitous nature of alcohol marketing is particularly harmful for vulnerable groups such as people who have a problem with alcohol – that’s an estimated 578,000 people in Ireland.

The impact of marketing on young people, while outside the scope of this submission, has also been well documented. The BAI’s own figures have shown that 7 out of 10 of the top programmes watched by children are big sporting events and Diageo is the number 4 advertiser to children.

AAI believes that given the delays in implementing alcohol restrictions enshrined in national law, in particular the broadcast watershed, the BAI should take action to ensure that alcohol ads are not shown before the watershed, while waiting for Public Health Alcohol Act to be implemented. This would at least curb the frequency of alcohol ads and protect young people and vulnerable groups immediately.

AAI has serious concerns around the issue of alcohol product placement and sponsorship of programmes. As regulations around where and when alcohol advertisers can run ads tighten, the industry is continually seeking new opportunities to get around any rules put in place.

Product placement and sponsorship of popular programmes are strategies the alcohol industry is using to normalize alcohol use in society and to drive sales.

A study analyzing UK TV shows in 2015 found very high levels of prevalence of alcohol product placement on the popular shows. An analysis of almost 3,000 minutes of national TV revealed that just one in 20 characters' drinks were a glass of water, while more than a third were alcoholic beverages.

Over two one-week periods, soap operas were found to dedicate 39% of "drinks screen time" to alcohol, with sitcoms giving 25%, dramas 34%, and The Archers radio show 44%. It is likely that research in an Irish context would yield similar results.

In respect of sponsorship, it is concerning that RTE allows alcohol brands to sponsor programmes and create marketing campaigns that sees alcohol brands expand their sponsorship reach across other RTE platforms, i.e. the RTE guide and website.

The Cassillero Del Diablo sponsorship of the Normal People was particularly insidious, ie increasing wine ads during COVID when lockdown was at its height and home drinking and domestic abuse was spiking, as evidenced by the words of the brand itself:

"In the early days of Covid19 TV played a hugely important role in keeping people informed and entertained. With TV being the most trusted medium we identified the opportunity to bring forward our plans and maximise TV's potential during the lockdown."

The BAI has a responsibility to ensure damaging campaigns like this are not allowed to occur.

Alcohol is 'no ordinary commodity – 'it causes cancer, is neurotoxic, a teratogen and addictive. Advertising of alcohol is therefore unlike that of any other product. The wellbeing of citizens and public health considerations must be given primacy over the commercial interests of the alcohol industry.

AAI recommends that:

- The BAI should take action to ensure that alcohol ads are not shown before the broadcast watershed, while waiting for Public Health Alcohol Act to be implemented.
- Alcohol brands (including zero alcohol products) should not be allowed to sponsor programmes and the BAI should show leadership around this issue.
- Alcohol brands should not be allowed to use sponsored content campaigns to advertise across platforms allowing it to normalise the visibility of a harmful product and drive consumption of alcohol.

