



**AlcoholAction**  
Ireland

# Policy Briefing

The sale and marketing of zero  
alcohol drinks

**May 2023**

Alcohol Action Ireland (AAI) was established in 2003 and 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 campaigning, advocacy, research and information provision. 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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In recent years, the marketing of what are called no- and low-alcohol beverages (NoLos), has been expanding, even though they are a small share of the alcohol market. The alcohol industry portrays these drinks 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.

AAI has in recent years been highlighting the marketing of zero alcohol products, in particular how they are used to circumvent advertising restrictions under Ireland's Public Health Alcohol Act (PHAA).

Not only is the marketing of these products being used as a trojan horse to get around laws designed to protect children and other vulnerable groups, according to the WHO, they further normalise a culture of alcohol consumption and blur potential conflict of interest in developing public health policies.

In a briefing published in April 2023 the WHO said there is a “need to monitor NoLos consumption and impact on alcohol consumption to understand the public health implications of them.” The WHO also categorically stated that NoLo marketing needs to be regulated to protect children, pregnant women and those seeking to stop drinking.

AAI has been recommending for some time that the Department of Health examines how the marketing of these products is contravening the letter – and the spirit of the PHAA. This issue is of increasing concern to academics, politicians, parents and those interested in protecting children from predatory marketing – and indeed the global health community, as demonstrated by the WHO briefing, published in April 2023.

It is important to note that there is substantial evidence of wide-spread alcohol industry messaging which is significantly at odds with public health knowledge of alcohol issues. It is clear, that the alcohol industry denies, distorts and underplays harms caused by the product it makes money from manufacturing, promoting and selling.

This briefing sets out concerns around the sale and marketing of what the WHO calls ‘alcohol-related products.’ Certainly, as with alcohol, they are ‘no ordinary product’.

The aim of Ireland's Public Health Alcohol Act (PHAA) is to reduce alcohol use by 20% across the whole of the population and a key part of this is to reduce the level of alcohol marketing in Ireland.

The PHAA measures to reduce alcohol advertising are in places that children inhabit- near schools, playgrounds, on trains and buses, in cinemas – and also on the field of play in sports. 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.



Just as these legal mechanisms came into force, big alcohol brands began brand sharing – that is advertising zero alcohol beers using the same parent branding, logos, colours and parent name, in the spaces where PHAA outlawed alcohol advertising. AAI believes this is in contravention of the PHAA, which states:

*“Advertising” means any form of commercial communication with the aim or direct or indirect effect of promoting an alcohol product and includes, in relation to an alcohol product, every form of recommendation of the product to the public including—*

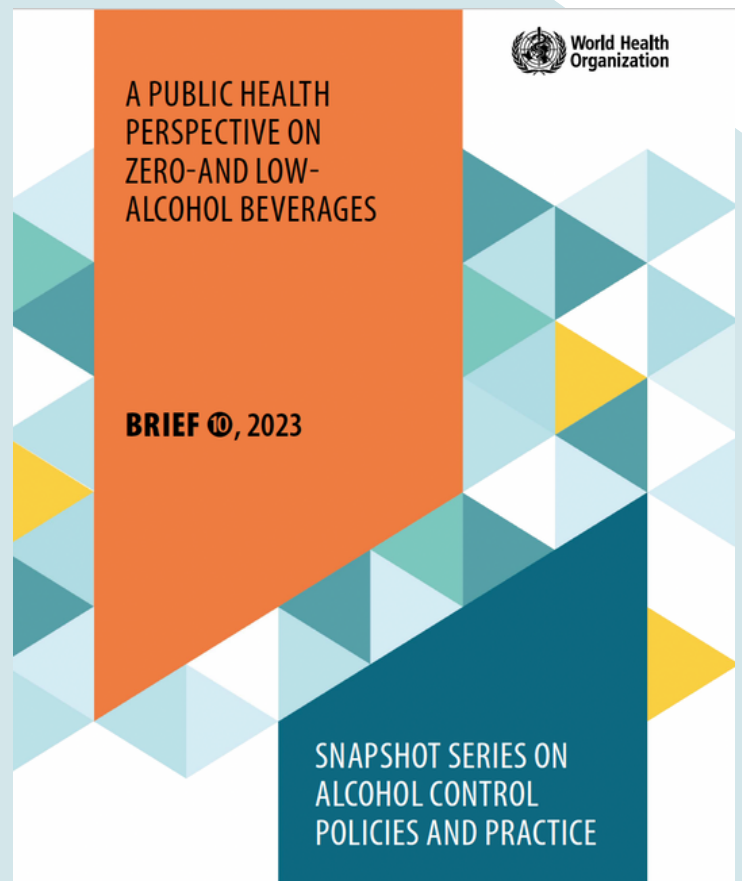
- (a) (i) a statement of the name of a manufacturer or importer of an alcohol product, or the name of any brand of alcohol product, or*
- (ii) a statement of any trade description or designation, or a display or other publication of a trademark, emblem, marketing image or logo, by reference to which the product is marketed or sold.*

Not surprisingly, research indicates that shared branding successfully increases young people's brand familiarity and affects their brand recognition and brand awareness.

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. This will normalise drinking at every occasion – from the gym to the road to the waterways. The switch from zero to alcohol will be much more seamless in this scenario, but much more dangerous too given the settings in question.

For example, Heineken's ad campaign for 'Heineken 0.0' uses the tag line: "That moment you couldn't have a beer... now you can", with ads showing people drinking Heineken 0.0 while doing things like driving or going water-skiing. This is a worrying departure for an industry clearly on the ropes in terms of increasing and long overdue regulation.

The WHO's [briefing](#) also finds that the marketing of NoLos by well-known alcohol brands is of 'particular concern' because large alcohol brands can use alibi marketing (i.e. the use of core elements of a brand's identity) and brand stretching to promote their products and brand names in places that have otherwise restricted the marketing of alcoholic beverages. As AAI has been pointing out in recent months and years, this is exactly what is currently occurring in Ireland.





Like alcohol itself, zero alcohol products are no ordinary product and seek to further normalise drinking at every single occasion in life. There is no end to the possibility of where industry will go with this or what other consequences might flow from it over time.

Another serious lacuna in regard to these products is that there is no law preventing zero alcohol drinks being sold to under 18-year-olds. 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.



The WHO has stated that: 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."

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.

The WHO recommends that the alcohol by volume content of NoLos must be defined, harmonised and clearly labelled.

## Recommendations

In line with the WHO's briefing, AAI recommends:

- Prohibiting the marketing of zero alcohol drinks to children and in the spaces designated by PHAA as children's environments.
- Banning brand sharing – i.e. advertising that associates zero alcohol products with the full-strength brands
- Developing regulations around the sale of NoLos, in particular zero alcohol products which are not suitable for children to purchase
- Monitoring the consumption of these products and impact on aggregated alcohol consumption to understand the public health implications of NoLos.

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