

Conclusions and outcomes of the
FAR SEAS Thematic Capacity Building Workshop 1ⁱ
Online Alcohol Advertising and Sponsorship



FAR SEAS Topic: Online Alcohol Advertising and Sponsorship

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Background to the workshop

Europe has the highest level of alcohol consumption and alcohol-related harm in the world, including alcohol-attributable cancer¹; and there is a growing awareness of the significant role that alcohol plays in the European burden of disease, premature mortality, costs of healthcare and human suffering (including cardiovascular diseases², communicable diseases^{3,4}; and mental health disorders, including depression⁵), even in moderate amounts.

Alcohol diminishes personal security, increases transmission of infectious diseases and impairs human capital, achievement and productivity⁶; and also impacts on the social environment, increasing criminality and violence.^{7,8} A recent economic study in a high income country has estimated the costs of alcohol to be higher than those of all illicit drugs combined and similar to the costs of tobacco.⁹

At the same time, spending on alcohol advertising, through a multitude of channels, both off- and online, is a major expenditure of the alcohol industry, because it promotes alcohol consumption 1011 12 and increases sales. Unfortunately, this promotion of alcohol products also contributes to the unnecessarily high level of alcohol-related harm and cancer in the European Union.

Workshop 1 - Alcohol Advertising and Sponsorship in Traditional and Digital Mediaⁱⁱ

The first DEEP SEAS-FAR SEAS Thematic Capacity Building Workshop brought together 127 policymakers, expert scientists and civil society actorsⁱⁱⁱ to exchange knowledge and discuss current issues regarding the effective regulation of alcohol advertising and promotion. The long-term goal is to support EU Member States in applying European directives, developing viable policy options and implementing comprehensive action plans for regulating alcohol marketing, which promote health and reduce alcohol-related harm, including alcohol-attributable cancer.

The event comprised a series of 4 online sessions, held in December 2020, which address 4 key sub-topics. Session 3 was devoted exclusively to the FAR SEAS topic, while sessions 2 and 4 covered transversal topics relevant to all marketing and sponsorship policy issues (relating to alcohol marketing both online and offline):

Session 1	Session 2	Session 3	Session 4
Wed 9th December Regulating traditional media – television, print, sponsorship	Mon 14th December Warning messages and consumer information to counter harm	Wed 16th December Tackling online media promotion of alcohol	Mon 21st December Regulating low-strength alcohol product marketing – closing loopholes

Introduction and background on the FAR SEAS topics of the workshop sessions

Decades of scientific evidence indicate that increased exposure to alcohol marketing across all types of media increases consumption of alcohol, leading to higher levels of alcohol related harm (ARH).

Self-regulation by the alcohol industry and affiliated bodies is mainly concerned with the content and channels of alcohol adverts, and has been widely found in scientific studies to be ineffective in reducing drinking, ARH or underage drinking. Similarly, co-regulation, combining statutory regulation

ii The workshop was co-hosted and supported technically by the Department of Addictology, First Faculty of Medicine, of Charles University in Prague, and the Office of the Government of the Czech Republic.

iii For a breakdown of participants by session, profile and geographical background, please see Annex 3.

and self-regulation, has not been found to be effective in limiting exposure of children to adverts, curbing underage drinking or reducing ARH.

Wine currently holds a special status in some EU countries with regards to promotion and advertising (in particular wine producing countries), despite evidence that alcohol in all forms is linked to health harms and without net positive effect. This special status therefore needs to be re-examined and brought in line with health priorities.

Online alcohol advertising: As the EC recognises: “The media landscape has shifted dramatically in less than a decade. Instead of sitting in front of the family TV, millions of Europeans, especially young people, watch content online, on demand and on different mobile devices.”¹³ As a result, the AVMSD was revised between 2016-2018, to address not only traditional media, but also online media sources, such as websites, social networking sites, social media, video-sharing platforms and user-generated content.

At the same time, the rise of alcohol advertising via the internet and digital media has multiplied dramatically; and its adverse influence on alcohol consumption, especially that of young and susceptible populations, such as those in recovery, has led many policymakers to review the scope and impact of existing regulations. Many countries in Europe are developing legislation on the digital sphere or are looking into adopting targeted legislation addressed at these digital phenomena.

One policy option, drawing on the regulation of other cancer-causing agents, is to mandate clear consumer information to counter harms in the form of **labelling and health promotion messages** on alcohol products and/or to accompany alcohol marketing and advertising online and off-line.

Widespread warning messages accompanying alcohol information, if carefully developed and displayed on rotation to avoid habituation, are a valid policy regulatory tool, which could raise public health awareness and alcohol health literacy and result in societal and industry behaviour change and improved population health.

Low- and non-alcohol products have been undergoing a boom in popularity, production and investment in marketing, being promoted to tap into the growing health and well-being market. There is some compelling evidence that encouraging drinkers to switch to lower alcohol products could result in broad societal public health gains.^{14,15} Specifically, *unpublicised reformulation* to lower the alcohol content of existing products shows more promising results than offering new low- or non-alcohol products, always bearing in mind that there is no lower threshold for the cancer risk of alcohol (the only safe amount to completely avoid alcohol attributable cancer is zero).

However, particularly regarding non-alcoholic products, regulation presents challenges in terms of a) dissociating brand visual identity for alcohol and low-/non-alcohol products; b) prohibiting promotion to minors, to prevent ‘gateway’ use; and, c) avoiding the normalisation and ubiquity of alcohol brand products in settings or situations that could lead to problematic drinking (e.g., during pregnancy, driving, during sports)

The key messages fed into the workshop via the background document, which was available to all participants in advance of the sessions, can be seen in Annex 1.

Outcomes of the workshop

During the 4 online sessions (see the agenda of the workshop in Annex 1), panellists presented their knowledge, perspectives and experiences in the area of the session, through short videos and live question and answer sessions, which set the scene for discussions of key issues in policy decisions. Following small-group discussions, with a pre-assigned moderator and rapporteur, in which participants were instructed to address and reach a level of consensus on a concrete policy-oriented question, responses and points for further consideration were reported back to the whole workshop group and discussed further to arrive at conclusions, points for consideration and suggestions on the next steps to regulate alcohol advertising in Europe.

The main take-home messages raised and supported by participants over the four sessions are summarized in *Figure 1* below. A more detailed account of the presentations and discussions is given in the next section.

Figure 1. Main outcomes of workshop sessions



iv The videos can be seen on the workshop web-page, here: <https://www.deep-seas.eu/capacity-building/thematic-workshop-1-alcohol-advertising-and-sponsorship/>

Presentations and discussions

Each of the 4 sessions of the workshop comprised 3 presentation slots – an introduction, evidence brief and stakeholder perspectives – followed by a discussion in small groups to tackle a specific policy question. Here we give an account of the presentations and feedbacks from the discussions, session by session, relevant to the FAR SEAS topic of *Online Alcohol Advertising and Sponsorship* (Sessions 2, 3 and 4).

Session 2 – Monday 14th December – Warning messages and consumer information to counter harm

- Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts

Jarmila Vedralová, the National Drug Policy Coordinator for the Czech Republic, welcomed participants to the second session of the workshop and highlighted the importance of the topic in the hosting Member State, and the recent example of a Czech public campaign to raise awareness of the dangers of drinking in pregnancy or for children.

John F Ryan, Director of the Public Health, country knowledge, crisis management directorate, DG SANTE of the European Commission, welcomed participants and mentioned the relevance of the topic of warning messages and consumer information to the EU Beating Cancer Plan.

Sofia Karttunen, Policy officer at the Commission in the Audio-visual & Media Services Policy Unit, DG CONNECT, explained that the AVMSD does not include any requirement related to health messages or consumer information on alcohol, but that Member States are free to include such requirements in regulations so long as they are considered ‘proportional and non-discriminatory’.

Ana Sarasa, scientific officer at the Joint Research Centre (JRC) of the EC, highlighted that health messages were considered an important part of the development of the JRC Marketing Codes of Conduct Toolkit, and that a good practice example given in the Toolkit is the Irish Public Health (Alcohol) Bill, which foresees the inclusion of 3 essential messages in warnings: dangers of alcohol consumption, risks when pregnant, and links to fatal cancers.
- Evidence updates - Key messages from science on regulation of alcohol advertising in traditional media

Eva Jané-Llopis, Director of Health and SDGs at ESADE Business School in Barcelona and Senior Associate Professor at the School of Public Health, Maastricht University, gave an overview of the evidence coming out in the recent WHO Health Evidence Network (HEN) report on existing practice and barriers and facilitators to development and implementation of alcohol labelling policy. This clearly indicated effectiveness of labels which include 1) ingredients, 2) nutritional / calorific values, and 3) health information or warning messages. She presented data showing that existing legislation in the EU is very limited, especially on calorific values and general health information; and highlighted recent research from Canada (Pechey et al. 202016), which found that the most effective labelling uses pictograms and clear messages. Dr Jané-Llopis also presented the forthcoming ALHAMBRA work in this area, which will bridge some of the research gaps by providing an evidence-based library of effective messages and labels, rank communication objectives based on the burden of harm and provide model message proposals for policy makers to use.

Mariann Skar, General Secretary for Eurocare (the European Alcohol Policy Alliance) gave an account of the past, present and ongoing work of the organisation in the AVMSD and currently the Digital Services Act, including efforts to strengthen marketing regulation (e.g., on sponsorship, regulating content and reducing exposure) at the EU and national levels. Sandra Tricas-Sauras, Head of Research for Eurocare, highlighted the main points that policy makers should bear in mind regarding warning messages to protect population health; specifically, she highlighted that consumers demand this information and have a right to know what is in the products they consume, and recent progress on the national level (less on the European level). She also warned that voluntary commitments have so far been completely inadequate in increasing the number of health messages on alcohol beverages. Mariann Skar also stressed the importance of framing the policy options positively – as health promotion information (demanded by consumers) rather than warning messages (easier to reject by consumers).

- Country/EU multi-stakeholder experiences

Ireland - *New regulations and health information in alcohol adverts* – Eunan McKinney, head of Communications and Advocacy at Alcohol Action Ireland (AAI), gave an overview of the Irish approach and Public Health and Alcohol Act of 2018 as it related to warning messages (3 elements as mentioned above) and other aspects of alcohol advertising. He highlighted the persistent obstructive tactics that alcohol industry lobbyists have used to delay the act from taking effect, as well as the delays that will likely occur through the EU scrutiny process. He also explained the civil society role in counter-lobbying to see the regulations through.

Czech Republic – *Tackling alcohol harm and the SAFER project* – Miroslav Bártak, Head of the Centre for Alcohol-Related Harm at the Charles University in Prague, explained that the Czech regulation applies to all types of media and 1) cannot encourage abusive use, 2) negatively or ironically assess abstainers, or 3) be directed at under 18s. However, labelling and messaging is essentially left to the industry, without health sector influence. He also outlined the Czech work under the WHO SAFER initiative^v, which has made the most progress in the area of alcohol advertising.

Slovenia – *The “VeščajPiješ?” mobile app and health messages* – Sandra Rados-Krnel, Head of Research and Project Management at National Institute of Public Health in Slovenia, gave an overview of the Slovenian regulations, and presented a different approach to health promotion messages – a mobile app (“Do you know what you drink?”) which allows users to scan product bar codes and receive consumer information and health messages. The app builds an alcohol module onto a successful app giving food information, responding to a high demand for nutritional information on beverages; and uses this as an opportunity to promote healthier lifestyles and increase consumer awareness.

^v SAFER - A world free from alcohol related harms https://www.who.int/substance_abuse/safer/msb_safer_brochure.pdf

Breakout discussions tackled the question: *How can we gather support for accurate and effective warning messages across different governmental sectors? Should messages be tailored to MS?*

The following points were made by the group rapporteurs and moderators in the feedback and wrap-up sessions:

- A **coherent set of messages** across the board is more important than tailoring, which runs the risk of watering down the impact of warning messages or health information.
- The issue of providing nutritional, calorific and health information must be re-framed as **consumers' right to know** what they are buying and imbibing. This is a cause that all governmental sectors have to support and is also in line with other pro-carcinogenic products.
- **Cancer warnings are the primary sticking point** and received the most resistance from the alcohol industry, who have delayed this legislation (e.g., in Ireland) largely through small practical arguments (costs of re-printing, space on the label etc.)
- In general, the industry is not able to be impartial or health-focused on this point. Therefore, **industry actors have no valid role in designing the content or regulations on health information**, or in enforcing their use.
- Public health actors need to join forces and use the EU Cancer Plan and similar initiatives to support those countries who are leading in developing stronger health information regulation on alcohol, and maintain international pressure to push this legislation into becoming mainstream.
- Greater support is also needed from European and international organisations.

Session 3 – Wednesday 16th December – Tackling online media promotion of alcohol

- Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts

John F Ryan, Director of the Public Health, country knowledge, crisis management directorate, in DG SANTE, talked about the EU Beating Cancer Plan. He mentioned specific challenge and additional risk posed by online alcohol marketing in combination with the lockdowns due to the coronavirus; and how this, along with other determinants such as lack of activity, were of relevance as determinants of cancer.

Sofia Karttunen, Policy officer at the Commission in the Audio-visual & Media Services Policy Unit, DG CONNECT, explained that the revised AVMSD requires Member States to adapt existing regulation to take into account digital media, and provide reporting mechanisms for non-compliance with regulations. The Digital Service Act (DSA) will further codify procedures for notifying on illegal content and provide a clear legal framework for regulation.

Ana Sarasa, scientific officer at the Joint Research Centre (JRC) of the EC, mentioned that the JRC codes of conduct toolkit recognises the power of influence from digital marketing and the ethical imperative to protect children and other groups. The toolkit includes points on cross-border marketing, new communication channels, age-verification aspects, monitoring of digital marketing, influencer marketing and content tagging.

Michal Miovský, Professor of clinical psychology and vice-Dean at the Charles University in Prague talked about how research could better support policy in this area, and the need for continued

investment in capacity into new issues such as neuromarketing and digital innovations. He also highlighted the importance of tapping into the resource of academic doctoral students to bridge the gap between research and practice, foster intergenerational collaboration to exchange different strengths, and keep policy up-to-date.

- Evidence updates - Impact and regulation of online marketing

Nathan Critchlow, Researcher and SSA Academic Fellow at the Institute for Social Marketing and Health, University of Stirling in Scotland, gave a comprehensive account of the different forms and mechanisms used in online marketing of alcohol, explaining the categories of paid-for media, owned media, earned media, and, the more ambiguous 'native media' (which is not immediately apparent as marketing). He ran through the most recent evidence which strongly demonstrates the impact of online advertising on drinking behaviour; and highlighted two very compelling studies. Dr Critchlow gave an outline of the 8 main challenges faced by policy makers in this area, and knowledge gaps for future policy research. He stressed the potential game changer of gaining collaboration from the big technology companies, which have so far been found to join the conversation only when a bold policy move is made, such as an outright ban and sanctions for online marketing.

Hanneke Hendriks, Assistant Professor at the Amsterdam School of Communication Research, provided valuable insight into new evidence in the field of social media and networking sites (SNS) on the mechanisms used to market alcohol through these online channels, the impact on consumers (especially young people) and the modifying effect of sponsorship disclosures (e.g., #ad - which lowers the promotional impact). She highlighted key policy challenges being the enforcement of sponsorship disclosure regulations and, the problems of unreliable age-verification.

- Country/EU multi-stakeholder experiences

Finland – *Pioneering policy and development of social media regulations* – Emmi Kauppila, Researcher in online alcohol marketing at University of Helsinki in Finland, outlined the development of the Finnish approach to online alcohol regulation in brought in in 2008, which also addresses social media marketing. She also drew important messages from the report she authored on a comparative study on the impact of legislative change on alcohol marketing on social media sites in Finland and Sweden. Dr Kauppila highlighted up two key points at which legislation can fall down: loopholes and enforcement.

Lithuania – *Regulating online alcohol marketing - implementing a ban* – Nijole Gostautaite Midttun, President of the Lithuanian Tobacco and Alcohol Control Coalition (NTAKK) and Director of Mental Health Initiative in Lithuania, explained the clear and simple approach of a complete ban on alcohol advertising which has been adopted in Lithuania in 2008; and drew attention to the main obstacle to taking such action – lack of political will. She explained how civil society organisations can be instrumental in supporting political actors in moving such legislation forward.

Czech Republic – *Regulation of digital alcohol promotions from the marketing perspective* – Denisa Hejlová, Head of the department of Marketing Communication and PR at the Charles University in Prague, described the current and historical culture surrounding alcohol promotion in the Czech Republic, and gave us insight into how health and marketing sectors can collaborate to regulate online advertising or *persuasive communication* (in all its forms – including covert advertising). She presented a grassroots ethical initiative (#fér_fluencer) established by Czech communication to encourage

ethical practice such as disclosure of sponsorship or payment on social media and not promoting alcohol and tobacco.

Breakout discussions tackled the question: Which are the key policy tools needed to overcome challenges in regulating online alcohol marketing? How can member states support each other in this?

The following points were made by the group rapporteurs and moderators in the feedback and wrap-up sessions:

- The global nature of the internet means that we can make points on the supra-national level, and that sharing information and knowledge between countries towards **international consensus, support and recommendations** is essential.
- **Digital reach represents an ethical and political problem** of which there is growing recognition also outside the alcohol field, with a change in the political climate through such recent news items as the Cambridge Analytica scandal.
- The alcohol public health field needs to **join forces with other areas and products**, such as junk food – the WHO CLICK monitoring tool is one example of this.vi
- A perfect solution should not be the enemy of the good – Member States are advised to **aim for a complete ban of all alcohol advertising (including online)**, as the most cost-effective and clear policy option, and be prepared to concede certain points to reach a workable solution whilst moving in a good direction (bearing in mind the principle of positive stipulation rather than prohibition).
- The threat of a ban may also **incentivise larger tech companies** and bring into the conversation.
- Although there is a need to focus research on harms to adults as well as children, **young peoples' voices have a vulnerability and power of persuasion** that is important to harness in making political arguments – qualitative studies can bring these to the fore.
- One possible step in the right direction is to legislate for a system of **opting in for alcohol content**, although this is not a perfect solution given the weak point of age verification.
- Stronger EU regulation than the AVMSD and DSA could also provide better support to Member States.

Session 4 – Monday 21st December – Regulating low-strength alcohol product marketing – closing loopholes

- Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts

Hana Horka, Policy Officer at the European Commission, department for health determinants and international relations, gave a short live address highlighting the next steps towards the adoption of the EU Cancer Plan in February 2021. She noted that as alcohol is an important determinant of cancer burden, and there is no lower limit for the cancer risk posed by alcohol, the topic of how to regulate the promotion of low- and zero-alcohol products is also of high relevance to the strand dealing with lifestyle prevention of cancer.

vi <https://www.euro.who.int/en/health-topics/disease-prevention/nutrition/publications/2019/monitoring-and-restricting-digital-marketing-of-unhealthy-products-to-children-and-adolescents-2019>

Jürgen Rehm, Executive Director of the Institute for Mental Health Policy Research and Senior Scientist in the Campbell Family Mental Health Research Institute in Toronto (CAMH), Canada, gave an overview of research findings on alcohol as a cause of cancer. The international Agency for Research on Cancer has stated that there is the strongest possible evidence that alcohol is carcinogenic to humans. Dr Rehm advised policy makers to take a long-term view to see the positive impact of alcohol regulation on population cancer rates (10+ years); He pointed out that there is no lower threshold at which alcohol does not cause cancer, and so policy should always aim to reduce consumption, even among moderate drinkers. Finally, he pointed to the ample evidence for the effectiveness of the WHO 3 best buys: increasing relative price of alcohol, reducing availability, and banning advertising.

Sofia Karttunen, Policy officer at the Commission in the Audio-visual & Media Services Policy Unit, DG CONNECT, pointed out that the AVMSD regulations governed all alcohol products equally – including low-alcohol products. For non-alcoholic products (as with all alcohol), the general rules apply: advertising must be readily recognisable, not use subliminal techniques, encourage behaviour which endangers health or safety, respect human dignity.

Ana Sarasa, scientific officer at the Joint Research Centre (JRC) of the EC, explained that the JRC toolkit on codes of conduct outlines different policy options for marketing different strength alcohol products, including considering the marketing of non-alcoholic versions of alcohol products as brand marketing. One suggestion from the workshop was to apply nutritional and compositional criteria to the whole market portfolio of a brand.

- Evidence updates - Impact and regulation of online marketing –

Peter Anderson, Professor on Substance Use Policy at the University of Newcastle and the University of Maastricht, presented evidence of health gains with policy which encourages drinkers to switch to lower-strength and non-alcoholic products. This is principally effective when the switch involves re-formulation of existing alcohol products (lowering the alcohol strength of beer or wine, for example), rather than developing and promoting new low- or zero-alcohol products. The most promising policy to incentivise re-formulation by the alcohol industry is minimum unit pricing or finely-tuned taxation. Dr Anderson also presented forthcoming work under the ALHAMBRA service contract, which will review all the evidence for lowering alcohol content on reducing alcohol harm and examine policy levers to support re-formulation by producers and lower levels of use by consumers.

Carmen Voogt, Senior Researcher at Radboud University Nijmegen, spoke about the risks of low-alcohol marketing and how to protect young people from gateway products. She pointed out that the field of research looking at the impact of low- and zero-alcohol (nolo-) marketing on behaviour was scanty, to date, and more was needed; but that one study found increased brand recognition and awareness of alcohol brands. Dr Voogt highlighted the potential risks: That nolo-alcohol products act as a gateway to earlier and riskier alcohol consumption; these products contribute to the normalisation and ubiquity of alcohol brands; brand awareness among children; difficulty enforcing legislation distinguishing non- and alcohol products.

- Country/EU multi-stakeholder experiences

Norway – *Norwegian approaches to regulating advertising of alcohol, low-alcohol and non-alcohol products* – Hanne Cecilie Widnes, Secretary-General of IOGT, Norway, described the long-standing Norwegian Alcohol Act (since 1975), which prohibits promotion of alcoholic beverages, as well as the promotion of other products under alcohol brands and to include alcohol in the promotion of other

goods or services. She gave graphic examples of the regulation in practice, and explained that the rules are media neutral (applying to online and traditional media). She mentioned challenges to the legislation, generally from illegal or unavoidable cross-border exposure to marketing or sponsorship, and stressed the importance of first-time fines as a means to tackle this. An IOGT survey found a large majority of the population support the marketing ban, which can be persuasive to policy makers and large image-conscious brands.

EPHA - *Insights from the European Public Health Alliance (EPHA) on protecting young people from unhealthy influence* – Nikolai Pushkarev, Policy Coordinator at the European Public Health Alliance (EPHA), gave an overview of the alliance work at the EU and national levels, and called for greater clarity and common vision of the aims and division of responsibility in this area. He raised 4 points to be addressed in relation to nolo- products: 1) focus on reducing *exposure* to marketing rather than marketing targeted at children; 2) recognise that ‘childhood’ goes right up to 18 years of age; 3) Self-regulation by companies is ineffective and only works to promote the companies further; 4) A step back allows us to see the underlying perversity of the situation with health-harming products pushed on young people.

Breakout discussions tackled the question: Which are the key policy tools needed to overcome challenges in regulating online alcohol marketing? How can member states support each other in this?

The following points were made by the group rapporteurs and moderators in the feedback and wrap-up sessions:

- **Minimum Unit Pricing (MUP)** (or as a minimum a general taxation rule applied to all alcohol products) emerged from most groups as an essential way forward, providing a robust floor for policy to reduce harm and encourage positive behaviour change (by populations and companies).
- It was noted that the **taste or very low alcohol content can act as a trigger** for those in recovery, making these products a contributor to relapse in alcohol use disorders.
- However, those **consumers with no previous problems cannot distinguish lower amounts of alcohol** (reformulated drinks), and therefore unannounced downward changes can bring substantial population health benefits.
- As well as branding distinctions, **points of sales initiatives separating alcohol, low- and non-alcohol** products can be a part of legislation.
- Raising and maintaining awareness of the **high sugar content in nolo- products** is also important – among general population and policy makers – if we do not want to substitute one public health crisis for another one.
- **Further research into the mechanisms and impact of nolo- marketing** on drinking outcomes could be useful to clarify the extent to which nolo- products are gateways to drinking, but waiting for it should not be a barrier to preventive action.
- Some countries (e.g., Poland) reported an increase in non-alcoholic beer sales during the COVID pandemic lockdown.
- It was also noted that definitions of non-alcoholic beverages vary between Member States, with some including anything up to 0.1% ABV in this category. Clearer cross-country definitions would be helpful.
- **Supermarket chains and other large suppliers** also have an important role to play, and one policy option is to regulate purchasing requirements.

Evaluation of the workshop

Each session of the workshop was evaluated voluntarily by the participants, with the online evaluation survey provided in the session and immediately afterwards in a follow-up email. The brief survey was designed to be quick and easy and disclosure of identity was optional (no respondents did so – all answered anonymously). Participants were asked to give 4 quantitative scores to the session they had attended:

- Overall evaluation (1→10)
- The topics and aspects covered by the speakers were relevant for the overarching theme of the session (1→5)
- I learned actionable information for my work and/or consolidated my understanding/knowledge. (1→5)
- There was enough time and opportunities allocated for interaction with the speakers and between participants. (1→5)

Participants were also invited to feedback in free text questions asking about:

- Which speakers of the session did you find the most interesting/informative/engaging?
- Please list the names of the speakers or the topics they talked about. Did you find any topic missing which you would like to see covered in relation to this session's theme?
- Do you have any comments or suggestions you would like to share?

A total of 105 responses were received overall (across all 4 sessions), with response rate tapering off slightly as can be expected with those attending more than one session possibly omitting to repeat the survey. The scores were analysed as an average of all responses, with only one outlier being removed for analysis (the lowest possible score awarded clearly not fitting with the very positive comments given on the session).

The quantitative score results can be seen in Annex 4. Over the course of the four sessions, the interaction score increased, which we hope was the result of technical adjustments made throughout the series of sessions to promote interaction in the breakout, feedback and wrap-up sessions.

The qualitative feedback is not detailed to protect anonymity, but the comments given are mostly positive and all useful to inform the development of future workshops in the series.

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- 15 Rehm J, Lachenmeier DW, Jané-Llopis E, Imtiaz S, Anderson P. (2016). On the evidence base of reducing ethanol content in beverages to reduce the harmful use of alcohol *Lancet Gastroenterology & Hepatology*. 1: 78-83.
- 16 Pechey, E., Clarke, N., Mantzari, E., Blackwell, A. K., De-Loyde, K., Morris, R. W., ... & Hollands, G. J. (2020). Image-and-text health warning labels on alcohol and food: potential effectiveness and acceptability. *BMC public health*, 20, 1-14.
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Annex 1: Key messages from the background documents & executive summary

Key messages on the regulation of alcohol marketing and advertising (both traditional and digital media)

The scientific briefing documents highlight a number of key messages which are relevant to the regulation of alcohol advertising through any media channel:

- Decades of scientific evidence indicate that **increased exposure to alcohol marketing across all types of media increases consumption of alcohol, leading to higher levels of alcohol related harm (ARH)**.
- **Alcohol advertising regulations are extremely variable in the EU**, although underpinned by the minimum requirements of the Audio-Visual Media Services Directive (AVMSD).
- **Self-regulation** by the alcohol industry and affiliated bodies is mainly concerned with the content and channels of alcohol adverts, and **has been widely found in scientific studies to be ineffective** in reducing drinking, alcohol-related harm (ARH) or underage drinking. Similarly, co-regulation, combining statutory regulation and self-regulation, has not been found to be effective in limiting exposure of children to adverts, curbing underage drinking or reducing ARH.
- When properly enforced, **alcohol marketing restrictions are a cost-effective strategy for reducing alcohol-related harm (ARH)**, and for this reason banning alcohol advertising is one of the WHO 'best buys' for alcohol policy.vii
- **Effective regulation has to be coherent and comprehensive** - applied and enforced across multiple media channels (including traditional print and broadcasting media, view on demand and other online media).
- Mandatory **warning messages accompanying alcohol information**, if carefully developed and displayed on rotation to avoid habituation, are a valid policy regulatory tool, which could raise public health awareness and alcohol health literacy and result in societal and industry behaviour change and improved population health.
- **Lower, low- and non-alcohol products** -There is some evidence that encouraging drinkers to switch to lower alcohol products could result in broad societal public health gains.viii ix Specifically, unpublicised *reformulation* to lower the alcohol content of existing products shows more promising results than offering new low- or non-alcohol products. Regarding the latter, the regulation of non-alcohol products presents challenges in terms of a) dissociating brand visual identity for alcohol and low-/non-alcohol products; and, b) prohibiting promotion to minors, to prevent 'gateway' use.
- **Toolkits and guidance** have been developed by the EC JRC, WHO and Nordic Council, to support Member States with a range of policy landscapes in implementing more effective regulation on alcohol advertising, to reduce alcohol-related harm.

Key messages on regulation of alcohol marketing through *digital* media

- **Digital media, and particularly social networking sites (SNS), are the perfect environments for marketing companies** to invest in since they can be used to track real needs and interests of users who are potential

vii World Health Organization (2017) Tackling NCDs - Best buys' and other recommended interventions for the prevention and control of noncommunicable diseases. Geneva: World Health Organization; 2017.

viii World Health Organization (2010) Global strategy to reduce the harmful use of alcohol. Geneva: World Health Organization; 2010.

ix Rehm J, Lachenmeier DW, Jané-Llopis E, Imtiaz S, Anderson P. (2016). On the evidence base of reducing ethanol content in beverages to reduce the harmful use of alcohol *Lancet Gastroenterology & Hepatology*. 1: 78-83.

consumers, or even co-opt consumers and influencers as part of the marketing team. In addition, digital media content can now be *targeted* to an individual level, based on users' preferences and tastes; and delivered to the target through a number of different devices, such as a tablet, phone or computer. The update review carried out for FAR SEAS affirms the association between exposure to digital marketing and drinking outcomes.

- Moreover, even though regulations exist in regard to the way alcohol can be promoted through traditional media and sponsorship, **only a few countries have adopted new measures to be applied to digital media, and there is a notable lack of legal guidelines on advertising through influencers on social media.**
- **Social Networking Sites (SNS) and, in particular, video sharing platforms** have been found to result in the highest awareness of alcohol advertising, which is an established predictor for the impact marketing on consumption and drinking behaviours.
- **User-generated content** in particular poses challenges to the regulatory frameworks, in order to enforce restrictions on alcohol promotion whilst ensuring that the democratic principle of freedom of expression is reasonably protected.

Annex 2: Workshop agenda

Session 1 – Wednesday 9th December – Regulating traditional media – TV, print & sponsorship

14:00	Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts <ul style="list-style-type: none"> - Video welcome by Alena Šteflová, Deputy Health Minister of the Czech Republic - Setting the scene – The Frame of EU Beating Cancer Plan (DG SANTE) - Audio-Visual Media Services Directive (AVMSD) (DG CNECT) & JRC Toolkit on Marketing Codes of Conduct
14:20	Evidence update - Key messages from science on regulation of alcohol advertising in traditional media – Wim van Dalen (EUCAM) & Gerard Hastings (Stirling, UK)
14:40	Country/EU multi-stakeholder experiences – France, Estonia, FYFA Project (EU)
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>How can MS be supported to ban alcohol advertising to protect young people, given that self-regulation has been found ineffective? (3 top priorities)</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 1

Session 2 – Monday 14th December – Warning messages and consumer information to counter harm

14:00	Start of the session, welcome back and Introduction: Toni Gual (chair) / EC & Czech hosts <ul style="list-style-type: none"> - Welcome by the Czech National Drug Coordinator - Raising awareness of cancer (EU Cancer Plan – DG SANTE) - Warning messages in the AVMSD (DG CNECT) and JRC Marketing Codes of Conduct Toolkit (JRC)
14:20	Evidence update - Sub-topic 2: Mandating health information and warning messages – Eva Jané-Llopis (ESADE, ES) & Mariann Skar / Sandra Tricas-Sauras (Eurocare)
14:40	Country/European multi-stakeholder experiences – Ireland, Czech Republic, Slovenia
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>How can we gather support for accurate and effective warning messages across different governmental sectors? How can messages be tailored to MS?</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 2

Session 3 – Wednesday 16th December – Tackling online media promotion of alcohol

14:00	Start of the session, welcome back and Introduction: Toni Gual (chair) / EC & Czech hosts <ul style="list-style-type: none"> - Frame of EU Beating Cancer Plan (DG SANTE) - Online aspects of the AVMSD (DG CNECT) and JRC Marketing Codes of Conduct Toolkit (JRC) - Welcome and points on the research-policy link by the vice-Dean of Charles University, Prague
14:20	Evidence update - Sub-topic 2: Impact and regulation of online marketing – Nathan Critchlow (Stirling, UK) & Hanneke Hendriks (STAP, NL)
14:40	Country/European multi-stakeholder experiences – Finland, Lithuania, Czech Republic
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>Which are the key policy tools needed to overcome challenges in regulating online alcohol marketing? How can member states support each other in this?</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 3

Session 4 – Mon 21st December – Regulating low-strength alcohol product marketing – closing loopholes

14:00	Start of the session, welcome back and Introduction: Toni Gual (chair) / EC <ul style="list-style-type: none"> - Drinking levels and cancer (Jürgen Rehm) - Points from the AVMSD and JRC Toolkit on Marketing Codes of Conduct on low- and zero-alcohol
14:20	Evidence update - Sub-topic 4: Science to support policy on low-strength and non-alcoholic product marketing – Peter Anderson (Maastricht, NL) & Carmen Voogt (Trimbos, NL)
14:40	Country/European multi-stakeholder experiences – Norway, Belgium, EPHA (EU)
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>How can we promote the switch to low- and no-alcohol alternatives, whilst strengthening regulation of alcohol marketing? – 5 Key points for coherent policy.</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 4

Annex 3: Breakdown of participant attendance by sector, session and country

Attendance by sector

Sector	Attendees		
Academia - research (alcohol epidemiology, survey)	1		
Academia - research (alcohol in social media)	1		
Academia - research (alcohol marketing, including TV, sport sponsorship, warning messages)	1		
Academia - research (alcohol public health, including epidemiology, comparative policy anal	3		
Academia - research (clinical and public health research)	3		
Academia - research (commercial determinants of ill-health)	1		
Academia - research (comparative alcohol policy analysis)	1		
Academia - research (determinants of substance use in youth)	1		
Academia - research (digital alcohol marketing)	1		
Academia - research (environmental determinants)	1		
Academia - research (harmful alcohol and substance use)	2		
Academia - research (knowledge transfer)	1		
Academia - research (marketing and warning messages)	1		
Academia - research (prevention, HR and treatment)	1		
Academia - research (social media and marketing)	3		
Academia - research (tobacco health warnings)	1		
Academia - research (youth alcohol use)	1		
Academia total	24		
Civil society - advocacy	1		
Civil society - Advocacy (communication users)	1		
Civil society - capacity building and advocacy	1		
Civil society - national temperance movement	3		
Civil society, healthcare - Advocacy	1		
Education - Youth	1		
European professional drug network	1		
Healthcare - Advocacy	4		
Intergovernmental collaboration	1		
NGO - Advocacy (European network of NGOs and public health organisations)	2		
NGO - Advocacy (European NGO alliance)	1		
NGO - Prevention	1		
Civil society total	18		
Public administration - Broadcasting/ media authority	12		
Public administration - Competition	1		
Public administration - Consumer protection	2		
Public administration - Education, culture	1		
Public administration - Food safety (national)	2		
Public administration - Healthcare provision (national)	1		
Public administration - Public health (alcohol legislation)	2		
Public administration - Public health (local)	1		
Public administration - Public health (MoH)	15		
Public administration - Public health (national)	25		
Public administration - Public health (regional)	8		
Public administration - Public health, drug/ alcohol (national)	1		
Public administration - Tax and customs	1		
Public administration -Public health (disease prevention)	1		
Public health - Monitoring, prevention, knowledge transfer (national)	3		
Public health - Nutrition (national)	2	Health	non-health
Public administration total	78	59	19
Public administration - DG CNECT (European)	1		
Public administration - Public health (European)	4		
European Commission	5		
Public health - international	1		
Umbrella for Flemish organisations dedicated to drugs; partner org of the Flemish gov't	1		
TOTAL excluding organisers	127		

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Attendance by session

As on 2020.11.20	09/12/2020	14/12/2020	16/12/2020	21/12/2020
	Regulating traditional media – television, print, sponsorship	- Warning messages and consumer information to counter harm	Tackling online media promotion of alcohol	Regulating low-strength alcohol product marketing – closing loopholes
Speakers	9	6	4	5
Breakout discussants	23	26	27	26
Breakout observers	50	50	52	46
<i>Total</i>	82	82	83	77
As on 2020.12.03	09/12/2020	14/12/2020	16/12/2020	21/12/2020
	Regulating traditional media – television, print, sponsorship	- Warning messages and consumer information to counter harm	Tackling online media promotion of alcohol	Regulating low-strength alcohol product marketing – closing loopholes
Speakers	9	6	4	5
Breakout discussants	29	30	33	31
Breakout observers	73	71	73	63
<i>Total</i>	111	107	110	99
Post-workshop attendance statistics	09/12/2020	14/12/2020	16/12/2020	21/12/2020
	Regulating traditional media – television, print, sponsorship	- Warning messages and consumer information to counter harm	Tackling online media promotion of alcohol	Regulating low-strength alcohol product marketing – closing loopholes
Speakers	6	6	6	5
<i>Recorded only</i>				3
Attendees	70	63	68	54
<i>Last minute registration</i>	1		3	7
Organisers (including Chair)	8	7	8	8
<i>Deep Seas/Far Seas</i>	6		5	6
<i>External (cEvents)</i>	2		2	2
<i>Total</i>	84	76	82	67

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Attendance by country

REGISTERED AS ON 05/12/2020					109			
ATTENDED (excluding organisers)					127			
EU27	Attended	Registered	Candidate countries	Attended	Registered	European Neighbourhood Policy	Attended	Registered
Austria	1		Albania			Algeria		
Belgium	3	3	Montenegro			Armenia		
Bulgaria	1		North Macedonia			Azerbaijan		
Croatia	3	3	Serbia		1	Belarus		
Cyprus	3	2	Turkey			Egypt		
Czechia	5	6	Total	0	1	Georgia		
Denmark	2					Israel		
Estonia	3	1	Potential candidates	Attended	Registered	Jordan		
Finland	1	1	Bosnia and Herzegovina	2	4	Lebanon	2	2
France	5	5	Kosovo*			Lybia		
Germany	4	4	Total	2	4	Moldova		1
Greece	1					Morocco		
Hungary			Other European countries	Attended	Registered	Palestine		
Ireland	6	4	Andorra			Syria		
Italy	5	5	Iceland	2	1	Tunisia		
Latvia	3	2	Liechtenstein			Ukraine		1
Lithuania	2	2	Monaco			Total	2	4
Luxembourg			Norway	2	2			
Malta	1	1	Russia	4	4	Other intl. countries	Attended	Registered
Netherlands	7	7	San Marino			Australia		1
Poland	5	3	Switzerland	2	3	India		1
Portugal	9	5	United Kingdom	5	4	Nigeria		1
Romania	3	3	Vatican City			Total	0	3
Slovakia			Total	15	14			
Slovenia	3	3					Attended	Registered
Spain	16	12				European Commission	4	3
Sweden	2					European area	8	6
Total	94	72				International area	2	2
						Total	14	11

Annex 4: Session evaluation scores

Session 1 – Regulating traditional media – TV, print& sponsorship (N=37)	AVERAGE SCORE
Overall evaluation (score out of 10)	8.30/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.65/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	3.97/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	3.92/5

Session 2 – Warning messages and consumer information to counter harm (N=25)	AVERAGE SCORE
Overall evaluation (score out of 10)	8.32/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.68/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	4.20/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	4.08/5

Session 3 – Tackling online media promotion of alcohol (N=23)	AVERAGE SCORE
Overall evaluation (score out of 10)	8.52/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.65/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	4.22/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	4.26/5

Session 4 – Regulating low-strength alcohol product marketing – closing loopholes (N=19)	AVERAGE SCORE
Overall evaluation (score out of 10)	9.11/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.84/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	4.47/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	4.37/5

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