



World Health  
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REGIONAL OFFICE FOR **Europe**

# Alcohol marketing in the WHO European Region

UPDATE REPORT ON THE  
EVIDENCE AND RECOMMENDED  
POLICY ACTIONS





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## ABSTRACT

Alcohol is a global risk factor for disease, and Europe is the heaviest-drinking region in the world. Research has shown a correlation between exposure to alcohol advertising and drinking habits – in particular, between youth exposure to alcohol marketing and initiation of alcohol use – and clear associations between exposure and subsequent binge or hazardous drinking.

This report analyses the current state of regulation concerning marketing of alcoholic beverages in Europe. It shows that, although most countries in the World Health Organization (WHO) European Region have some form of marketing regulation, very few have statutory bans to limit the marketing of alcohol beverages. In addition, the report highlights examples of current effective European alcohol marketing restrictions aimed at protecting young people that have been adopted in some countries in the Region.

In recent years, online platforms have played an increasingly important role in alcohol advertising and marketing, and many countries have updated their legislation in order to mirror the current situation. The report gives an account of online formats used for alcohol marketing and the ways in which they pose challenges for regulation, control and monitoring. It further discusses the need to develop protocols for distinguishing native advertising, user-generated content, and other commercial messages that may be difficult to identify as commercial messages. The real senders of such material are consumers, sometimes teenagers and children.

The report concludes that the global nature of alcohol marketing, and the ease with which it transcends national borders, necessitate regional and global responses, as well as national ones, and that opportunities exist to implement comprehensive, statutory regulations restricting or banning alcohol marketing to protect children and adolescents. In addition, increased awareness of the extensive challenges posed by online marketing, and political commitment to deal with them, are needed throughout Europe.

## KEYWORDS

ALCOHOL DRINKING – prevention and control

ALCOHOL – adverse effects

ALCOHOL POLICY IMPACT

BEST BUYS

HEALTH POLICY

MARKETING

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## CONTENTS

Acknowledgements	iv
Abbreviations	v
<b>1. Introduction</b>	<b>1</b>
<b>2. The cost of not acting</b>	<b>4</b>
<b>3. Multimodal advertising strategies: the case of food</b>	<b>4</b>
<b>4. Digital marketing: new research approaches</b>	<b>5</b>
<b>5. What are the current policies in Europe?</b>	<b>5</b>
<b>6. Update on country progress in implementing advertising regulations</b>	<b>8</b>
<b>7. Policies imposed by social media companies</b>	<b>11</b>
<b>8. Monitoring protocols</b>	<b>11</b>
<b>9. Conclusions and recommendations</b>	<b>13</b>
References	15

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## ABBREVIATIONS

<b>AVMSD</b>	Audiovisual Media Services Directive
<b>EU</b>	European Union
<b>EUCAM</b>	European Centre for Monitoring Alcohol Marketing
<b>HFSS</b>	high in saturated fat, salt and/or free sugars
<b>NGO</b>	nongovernmental organization
<b>WHO</b>	World Health Organization





## 1. INTRODUCTION

Europe is the heaviest-drinking region in the world and alcohol consumption is a leading risk factor for disease (WHO, 2018). In 2016, over 10% of all deaths in the World Health Organization (WHO) European Region were attributable to alcohol (WHO, 2018). Evidence suggests that exposure to alcohol marketing is associated with changes in alcohol-related knowledge, attitudes and behaviour, including among youth (see, for example, Anderson et al., 2009; Smith & Foxcroft, 2009; Jernigan et al., 2017).

When properly and efficiently enforced, alcohol marketing restrictions have been shown to constitute a cost-effective strategy for reducing the harmful use of alcohol, costing less than US\$ 100 per healthy life year gained in low-income countries and less than US\$ 500 in high-income countries (Chisholm et al., 2018). There has, however, been a recent growth in citizens' exposure to commercial messages, and the alcohol industry continues to increase spending on marketing (Wilcox, Kang & Chilek, 2015). Publicly available data on alcohol marketing expenditure are scarce, but it is estimated that the global total marketing spending for six of the largest companies was \$17.7 billion in 2017 (Jernigan & Ross, 2020); for example, two of the world's largest alcohol producers – AB InBev and Diageo – report spending 15% of their annual global sales on marketing (Burton et al., 2017).

With the help of new digital technology, companies can recruit consumers quickly and cheaply. The youngest users of digital platforms can be reached through app-based social platforms. In these, native marketing blends into popular games or social media sites featuring vloggers and influencers (Harvey & Sanchez, 2018).

The association between exposure to alcohol marketing and levels of alcohol consumption and harm is well established in the scientific community (Anderson et al., 2009; Smith & Foxcroft, 2009; Stautz et al., 2016; Jernigan et al., 2017). Evidence, consisting of longitudinal studies as well as experimental studies, points towards the fact that alcohol advertising exposure is positively associated with drinking behaviour, including among young people (see, for example, Smith & Foxcroft, 2009). A systematic review of longitudinal studies by Jernigan et al. (2017) included 12 studies published after 2008. Together, the studies covered 35 219 participants from Europe, Asia and North America, under the relevant minimum legal purchase age for alcohol; they showed a consistent correlation between marketing exposure and



level of youth alcohol consumption. Some of the studies found associations between youth exposure to alcohol marketing and initiation of alcohol use, while others found associations between exposure and subsequent binge or hazardous drinking. Although it is a less well-researched area, sponsoring of sports events has also been shown to have an impact on young audiences' alcohol consumption (see, for example, Brown, 2016).

While previous research has focused on exposure to marketing via traditional channels (TV, print media), more focus has recently been directed towards the internet and particularly social media. Product branding and profiling is repeated and reinforced across a whole spectrum of channels and media platforms, including TV, radio, printed media, internet content, apps and outdoor commercials, and synergized with sponsorship and influencer deals, as well as product placements (de Mooij, 2019). Both content analyses (Westberg et al., 2018; Barry et al., 2018) and analyses of effects (Huang et al., 2014; Beullens & Vandebosch, 2016) point out certain features in the ways these tend to appeal to consumers. Digital media have changed the nature of alcohol marketing, allowing clever and subtle expressions. Quickly evolving digital marketing methodologies present challenges from a legislative and regulatory point of view. These fall especially upon authorities responsible for overseeing and controlling marketing (see, for example, Jayanetti, Jones & Freeman, 2018; WHO, 2019).

Interactive online social media platforms allow companies to target and communicate with potential customers directly and engage them through, for example, the use of consumer-generated content (Griffiths & Casswell, 2010). Case studies on social media show a considerable presence of alcohol brands featuring marketer-generated and user-generated content (Westberg et al., 2018; Winpenny, Marteau & Nolte, 2013). This sort of marketing has increased globally (Nicholls, 2012; Jernigan & Rushman, 2014).

Alcohol-related social media posts by young people ("alcoposts") work through user corroboration (see, for example, RAND Europe, 2012). Positive associations with alcohol consumption are more visible than negative ones and are typically placed on participants' timelines by others (through the function of "tagging"). Alcoposts tend to receive more likes and comments than other posts. Such a social media grammar is likely to lead to a normalization of drinking and a tendency to underestimate alcohol-related risks among teenagers and young adults (Hendriks et al., 2018; Hendriks, van den Putte & Gebhardt, 2018; WHO, 2019; Critchlow et al., 2019). A cross-sectional study from four European countries shows that young people in Poland, Italy, the Netherlands and Germany



report frequent exposure to online alcohol marketing, and that there was a correlation of such exposure with binge drinking, as well as with the odds of starting to drink in the first place (de Bruijn et al., 2016).

Blurred boundaries between advertiser and consumer require a broadening of the scope of marketing regulation and an update of current legislation (RAND Europe, 2012). Part of this task concerns a clarification of the principles according to which commercial interests should or should not be able to involve citizens as free marketers, especially groups that are easily affected by alcohol-related messages.

Today, health policies also need to consider the protection of citizens' online life as a space of human communication, socialization and culture (see, for example, Chester, 2012; Hellman, Katainen & Seppänen, 2018). New marketing techniques blend into this social interaction (Freeman et al., 2014). Another tangible question for public health policies has become the issue of staying accountable to citizens in scenarios where digital technology creates advanced records and predictions of consumer behaviour (for discussions see, for example, Hendricks & Vestergaard, 2019; Mackey et al., 2017). This is not a marginal question for the jurisdictions of the European Region: in 2017, 72% of all European Union (EU) citizens used the internet daily. In all Nordic countries, Luxembourg, the Netherlands, the United Kingdom and Switzerland, the user percentage was over 90%. Daily internet use has become more common in all parts of Europe. For example, in Romania, daily internet use has grown from 26% in 2008 to 61% in 2017, and in Bulgaria from 33% in 2008 to 62% in 2017 (Eurostat, 2017). The proportion of daily internet use is higher for the younger segment of the population, as 92% of EU citizens aged 16–19 years reported that they had used the internet at least once a day in 2017. Young people also use social media platforms more regularly than their older peers (Eurostat, 2017). Also, underaged children navigate in social media landscapes: for example, 87% of all Swedish children aged 12–15 years are on Instagram and a staggering 95% on Snapchat (Internetstiftelsen, 2018).

It is clear that action is urgently needed since existing legislation and codes of conduct do not match the changing nature of the advertising methods employed in the commercial sector. Social media and other online and app-based marketing techniques can, for example, reach consumers in regions where alcohol-related content is prohibited in national law (Jernigan, 2010).

In November 2018 a revision of the Audiovisual Media Services Directive (AVMSD) was adopted by the EU Council (European Commission, 2018). The revision included elements such as a strengthened Country of Origin Principle; extension of rules to cover video-sharing platforms; better protection of minors; and strengthened provisions to protect children from inappropriate audiovisual commercial communications for foods high in saturated fat, salt and/or free sugars (HFSS foods). The revised version did not introduce substantial changes compared to its predecessor in relation to alcohol. The AVMSD does not apply specifically to alcohol advertising and has been criticized mainly for being content-oriented and not frequency focused. The European Public Health Alliance has criticized it for failing to protect children, empower parents or encourage governments to act forcefully (EPHA, 2017). Public health advocates have pointed out that the European counter-lobby is too strong to allow stronger directives and that governments need to work for stricter regulations on a national level. However, it should be noted that the AVMSD is a minimum harmonisation directive meaning that Member States of the European Union are allowed to implement more comprehensive provisions on their territories.

This report summarizes advances in the evidence and progress made since 2012 in the area of alcohol marketing in the WHO European Region. At the same time, it demonstrates the need for improved



alcohol marketing policies that are capable of effectively regulating the quickly evolving digital marketing methodologies employed in the commercial sector to market alcoholic beverages.

## 2. THE COST OF NOT ACTING

Commerce involving alcohol beverages, processed food, tobacco, gambling, and, soon, a growing range of legalized cannabis products is a worldwide lucrative business (see e.g. Miller et al., 2017; Schüll, 2014; Jernigan, 2009). The consumption of these products is among the leading causes driving noncommunicable diseases and premature death, creating a great tension between the aims of health and of commercial growth (Anderson, 2017). The global nature of industries means that jurisdictions all over the world are facing similar challenges with commercial determinants of health.

It is estimated that global retail sales of alcohol are worth more than US\$1.5 trillion, and the global companies spend billions of dollars each year on marketing (Jernigan & Ross, 2020). A study from the USA showed that alcohol advertising media expenditures for all alcoholic beverages increased by almost 400% between 1972 and 2012 (Wilcox, Kang & Chilek, 2015). The European alcoholic beverage industry is one of the largest in the world (Statista, 2019).

### Box 1. Key messages

1. Alcohol advertising and marketing is a massive and expanding phenomenon. Global companies spend billions of dollars each year on marketing.
2. The last decade has seen a shift from traditional marketing to digital landscapes. The new merged marketing channels, techniques and platforms make alcohol advertising a complex and ubiquitous phenomenon with multiple forms of expression.
3. Exposure to alcohol advertising affects the drinking behaviour of children and young people; these groups must be protected from intrusive marketing messages.

## 3. MULTIMODAL ADVERTISING STRATEGIES: THE CASE OF FOOD

Interactive media break down traditional barriers between content and commerce. Unprecedented intimacies can be created between marketers and children (Montgomery et al., 2012). This can be illustrated by inquiries into techniques and strategies used by food brands in social media. An analysis by Australian researchers Confos and Davis describes six features of marketing within digital networks that make content attractive to children, maximizing its impact on young people: (i) ubiquitous connectivity; (ii) personalization; (iii) peer-to-peer networking; (iv) engagement; (v) immersion; and (vi) content creation (Confos & Davis, 2016).

All these elements are captured in online marketing. Unlike more obvious kinds of advertising, online marketing can avoid detection by taking the form of puzzles, games, quizzes, music or videos. These types of content, which are downloadable in (for example) apps for mobile devices, have proved to be attractive to young consumers (for alcohol see, for example, Cranwell et al., 2016; Vandenbosch & Eggermont, 2016; Lobstein et al., 2017).

Online advertising interacts and engages, employing consumers as free marketers by encouraging them to like posts, reply to questions or tag their friends. Competitions and other games can encourage consumers to upload pictures of themselves, which in turn raises concerns over privacy.

Confos and Davis provide evidence of the ways in which food brands use sales promotions, where customers must first buy a certain product before getting online access to competitions or other “freebies”. The researchers conclude that food companies use the internet in ways that, taken together, appeal to youngsters and foster new forms of brand relationship. As young people spend substantial time online, these strategies can inspire long-lasting loyalty in customers, who carry their habits with them into adulthood. The strategies described by the researchers are also recognizable in alcohol advertising.

## 4. DIGITAL MARKETING: NEW RESEARCH APPROACHES

Previous research has produced evidence of the ways in which individuals – specifically, young people and other vulnerable groups – are affected by alcohol marketing and how this could be addressed effectively through policy (Hellman, 2017). Researchers (e.g. Lobstein et al., 2017) have called for ways of monitoring and understanding how new formats of alcohol marketing plug into young peoples’ alcohol consumption.

A study looking explicitly at Facebook (Noel & Babor, 2018) analysed the correlation between pro-drinking comments on Facebook posts and the desire to drink among 120 young adults living in the USA. The study concluded that pro-drinking comments may increase both the desire to drink and ad engagement, and both can be predictive of future drinking behaviour; it also concluded that the ways users can engage with alcohol advertising on social media should be subject to further regulation. This means that, with the exception of more straightforward content published online, the interactive features of Facebook and other social media communities have implications for the cultural acceptance of alcohol and drinking behaviours. This should be taken into consideration in legislation and codes of conduct dealing with commercial communication on alcohol. An example of how this can be achieved in practice (a case study from Finland) is given in **Box 2** below.

## 5. WHAT ARE THE CURRENT POLICIES IN EUROPE?

Marketing of alcohol is one of 10 target areas for policy options set out in the Global Strategy to Reduce the Harmful Use of Alcohol, launched and signed in 2010 by delegates from 193 states (WHO, 2010). In 2011, WHO suggested that a ban or comprehensive restrictions on alcohol advertising would be one of the top three most effective and cost-effective interventions to address the harmful use of alcohol, alongside tax increases and restricted physical availability of retailed alcohol via reduced hours of sale (WHO, 2011).

Most European countries have implemented policies regulating alcohol advertising to protect the youngest and most vulnerable segments of the population. The sets of regulatory policies implemented range from complete bans with penalties for legal offences to self-regulatory codes of conduct adopted by industry. It is claimed that the self-regulatory codes of conduct adopted by the alcohol and marketing industries provide an effective means of supervising good marketing standards (see, for example, the International Alliance for Responsible Drinking’s own list of forbidden items (IARD, 2011)). However, the

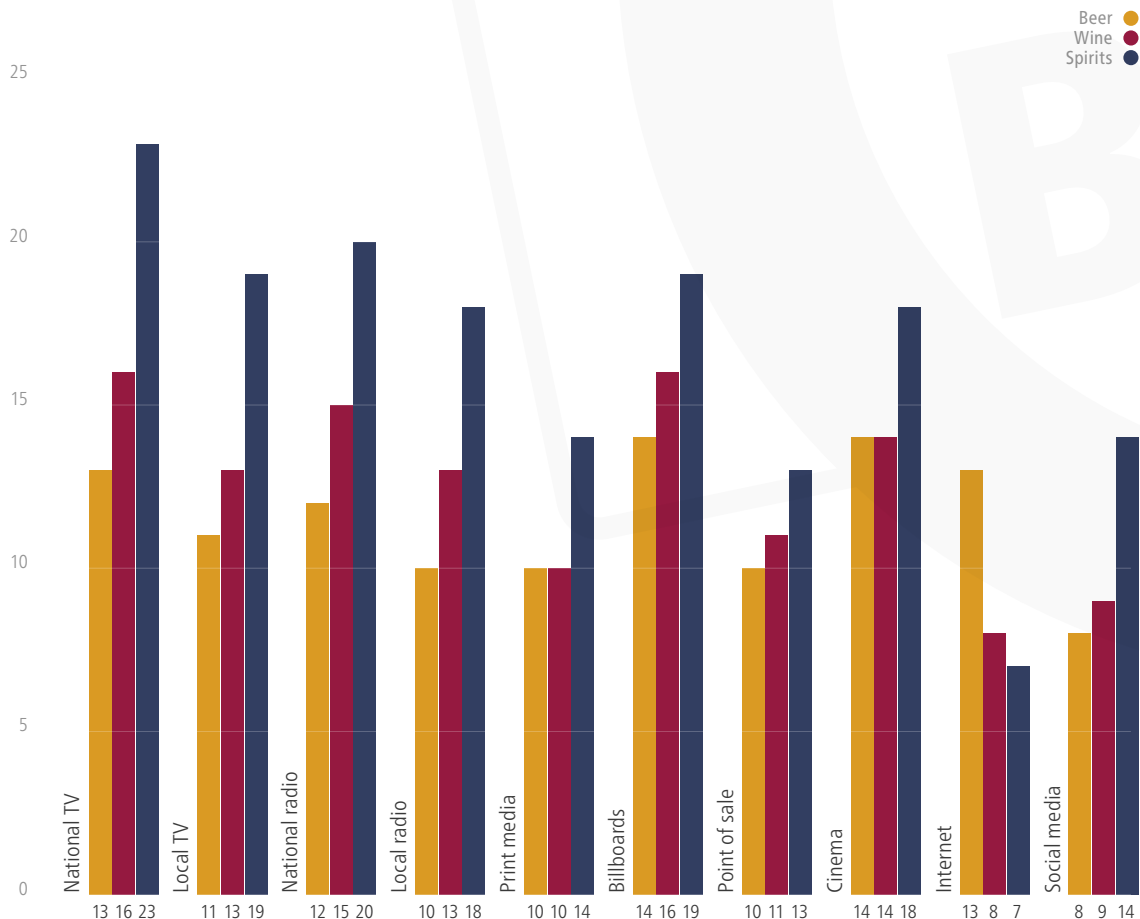


effectiveness of such codes has been questioned by several scientific reviews, which point out that the rules are often violated and vaguely formulated, creating loopholes and room for ambiguous content (see, for example, Noel et al., 2017; Zwarun & Farrar, 2005). Fifteen of the 53 Member States of the WHO European Region (28%) have in place a total statutory ban on all alcohol marketing (beer, wine and spirits) across TV, radio, print media and point of sale; 22 Member States (42%) have only partial statutory restrictions; and 16 (30%) have only a voluntary agreement, self-regulation or no regulations at all (WHO, 2019).

**Fig. 1** displays the number of Member States of the WHO European Region whose marketing policies are in line with the WHO recommendation that alcohol advertising should be banned for one or several beverage categories in the following contexts: national TV, local TV, national radio, local radio, print media, billboards, point of sale, cinema, internet and social media. The data are drawn from the WHO Global Survey on Alcohol and Health 2016. Note that the bans in **Fig. 1** do not necessarily indicate complete, comprehensive bans – partial bans are also included.

The strictest policies concern commercials for spirits, which are banned on national TV in 43% (n=23) of all countries. Bans on wine advertising are slightly less common – for example, 30% (n=16) of countries ban wine commercials on national TV. Bans on beer commercials appear to be even rarer – for example, 19% (10 countries) ban beer commercials in print media, while 25% (13 countries) do so on national TV.

**Fig. 1. Number of marketing bans in the 53 Member States of the WHO European Region, 2016<sup>a</sup>**

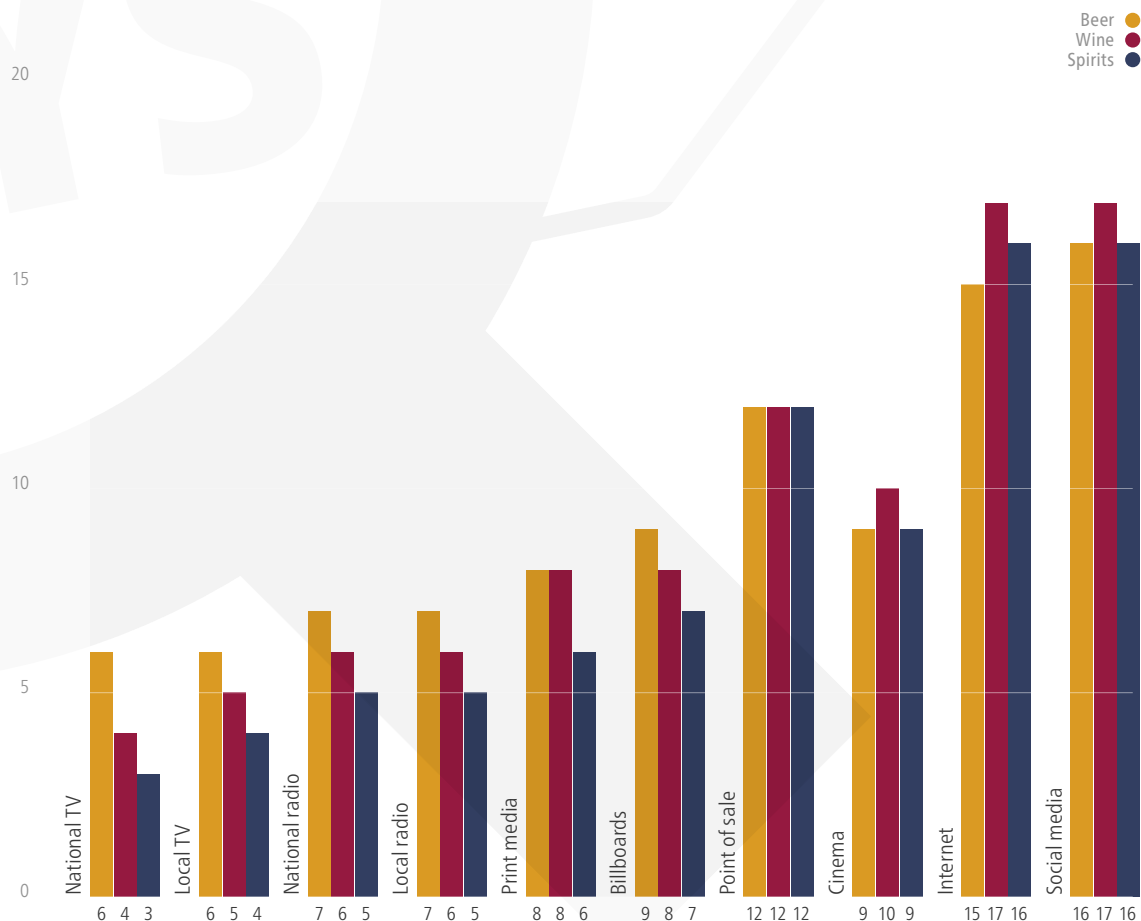


<sup>a</sup>Note that the figures shown in the table include both complete, comprehensive bans and partial bans.

Across all the above-mentioned contexts and media, Member States would most commonly report to the Global Survey on Alcohol and Health having statutory, partial restrictions with respect to time, place or content for commercials. This translates into restrictions that apply at certain times of the day, to certain places, or to the content of events, programmes, magazines, films and so on.

Fig. 2 shows the number of WHO European Member States that in 2016 still lacked marketing regulations for national TV, local TV, national radio, local radio, print media, billboards, point of sale, cinema, internet and/or social media – in other words, countries that reported to the Global Survey on Alcohol and Health having no policies in place. It appears that the more traditional marketing channels, such as TV and print media, are more likely to be regulated, as only a few countries reported having no regulations in place. However, when we look at more up-to-date methods using the internet and social media, we find that within this context nearly a third of all WHO European countries have no regulatory framework in place (the precise ranges are 28.2–32.1% across products for the internet and 30.2–32.1% for social media). In this area, there is massive room for improvement, and action is needed urgently because high speed, low cost and wide reach mean that a growing proportion of marketing messages are being spread across online landscapes (a trend that will only increase if such landscapes remain unregulated). It is challenging, yet crucial that legislation keeps up with new technologies.

Fig. 2. Number of countries in the WHO European Region without marketing regulations, 2016





## 6. UPDATE ON COUNTRY PROGRESS IN IMPLEMENTING ADVERTISING REGULATIONS

Since 2012, a number of changes have occurred in the area of alcohol marketing regulation. The following selection of updates was reported by Member States in the WHO Global Survey on Alcohol and Health 2016, with further information retrieved from other sources, as specified in the text.

**Bulgaria, Croatia and Italy** report significant changes in marketing regulations. Alcohol marketing in Bulgaria is self-regulated by commercial stakeholders. The Bulgarian association of manufacturers, importers and retailers of alcoholic beverages has approved common standards for responsible commercial communications about alcoholic beverages (EUCAM, 2012). Croatian regulations prohibit TV advertisement of tobacco, alcohol and spirits, as well as sponsorship of sports. In Italy Article 13 of the 2001 law on alcohol and alcohol-related problems (Law No. 125/2001) regulates alcohol advertising, such as a ban on advertising during children's programmes on TV and radio and in cinemas. It is reported that the latest edition of the Code of Marketing Communication Self-Regulation came into effect in March 2017.

**Ireland** reports that it has conducted a study on exposure of minors to alcohol advertising on linear and nonlinear audiovisual media services and other online services based on the AVMSD restrictions. Funded by the Irish Health Service Executive, researchers at the National University of Ireland Galway produced a report, *Alcohol marketing and young people's drinking behaviour in Ireland*, which was published by Alcohol Action Ireland in November 2015 (Fox, Kelly & Molcho, 2015). After the Global Survey data had been gathered, new sections of the Irish Public Health Alcohol Bill were signed. Since November 2019, advertisements for alcohol have been banned in or on public service vehicles, at public transport stops or stations, and within 200 metres of a school, crèche or local authority playground. Alcohol advertising is banned in association with films, shown in cinemas or in non-licensed premises, that can be viewed by individuals under 18 years of age. It will be prohibited for children's clothing to carry promotion for alcohol, such as sponsorship on children's football shirts. A section of the bill dealing with visibility of alcohol in stores is due to come into effect on 12 November 2020. A year later, on 12 November 2021, a prohibition is due to come into force on alcohol advertising at sporting events aimed at children or in which the majority of participants or competitors are children. Also prohibited is alcohol sponsorship of events that are aimed at children, in which the majority of participants or competitors are children, and which involve driving or racing motor vehicles (Department of Health, 5 November 2018). The bill includes a range of other measures that are relevant to wider marketing activities – for example, changes to packaging, minimum unit pricing and structural separation.

Both in **Scotland** and across the whole of the **United Kingdom**, the Irish legislation received public attention in late autumn 2018 in view of the region's exceptionally high alcohol consumption (see e.g. McEnroe, 2018). The Scottish Government's Alcohol Framework 2018, put forward in November 2018, gives the drinks industry until September 2019 to improve health labelling on products (Scottish Government, 2018). The WHO Global Survey reports that, in December 2013, the Broadcast Committee of Advertising Practice in the United Kingdom (the body responsible for writing and maintaining advertising rules for broadcasting) published a new, strengthened guidance note on scheduling of TV advertisements to help broadcasters identify which TV programmes should exclude advertisements for alcohol and other age-restricted products. In the United Kingdom the Advertising Standards Authority is responsible for



all advertising standards and consumer complaints. Alcohol advertisements must adhere to the self-regulatory United Kingdom Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (CAP code), and the co-regulatory United Kingdom Code of Broadcast Advertising (BCAP code) (IAS, 2017), though the effectiveness of this self-regulatory approach has been called into question (Noel, Babor & Robaina, 2017).

**Portugal** reached an agreement with the industry in 2014 to develop responsible business practices in the selling, serving and marketing of alcoholic beverages. Portugal's statutory regulations on advertising mostly concern the protection of youth and do not extend to print media (EUCAM, 2018). There is no explicit law regulating advertising of alcohol, but it is subject to the general rules of the Advertising Code (Decree Law 330/90) and the industry's self-regulatory codes.

**Turkey** reports that it has implemented the content in the EU's Directive for Commercial Advertising and Unfair Commercial Practices. The original EU Unfair Commercial Practices Directive (2005/29/EC, applied across EU Member States by December 2007) aims to achieve a higher level of consumer protection, enabling consumers to make informed and meaningful choices. It also aims to ensure that consumers are not misled or exposed to aggressive marketing and that any claim made by traders in the EU is clear, accurate and substantiated (Velentzas, Broni & Pitoska, 2012).

**Spain** reports that it has strengthened the consumer ombudsman's ability to impose sanctions in accordance with the country's marketing laws.

**Hungary** has modified its Code of Advertising Ethics.

**Lithuania** has a robust statutory regulation, the Alcohol Control Law, which came into force on 1 January 2018. It imposes a near-total ban on alcohol advertising, with only a few exemptions, such as producer logos in sales areas (van Dalen, 2018).

Since June 2018, alcohol advertising in **Estonia** has been banned on TV and radio between 07.00 and 22.00. Visuals associated with advertisements for alcoholic beverages cannot include a person, real or animated. Only a limited range of information can be included, such as the name of the drink, the type of drink, the name of the producer and the brand, product place of origin, ethanol content, and characteristics such as colour and taste.

In July 2012, **Russia** introduced a ban on alcohol advertising on the internet. This was tightened in July 2017, as distribution of information on alcohol sellers via the internet, including social media, was also forbidden. In March 2014 alcohol advertising was banned both from sports and recreational facilities and from an area within 100 metres of these facilities. However, between 2014 and 2018 some advertising restrictions for beer were loosened because of the FIFA 2018 World Cup.

Alcohol advertising was prohibited in **Finland** from 1977 until 1995, when Finland became a member of the EU. EU membership brought significant policy changes, including renewed and more liberal marketing regulations. Marketing of alcoholic beverages containing up to 22% alcohol by volume was now permitted under certain conditions, such as that minors could not be addressed or depicted. In 2008 various changes were introduced, such as a ban on advertising in cinemas showing films that could be viewed by individuals under 18 years of age. In January 2015 a further amendment to the law came into force, which aimed to give minors additional protection from exposure to commercial marketing messages. This amendment, which is the only one of its kind in the world, is described in **Box 2** below.



In December 2017, **Sweden** prepared a white paper on alcohol advertising on social media (SOU, 2017). The paper suggests that, while alcohol brands would be allowed to keep their social media pages, advertising on profiles should be banned. Social media brand pages should be used merely for communicating editorial material, not for advertising.

Importantly, gains in self-regulatory practices should be seen as less significant, in terms of public health, than statutory measures, as there is evidence that self-regulation is less effective than externally imposed control and does not protect vulnerable populations such as young people (Esser & Jernigan, 2018). Industry codes of conduct seldom cover all new types of media or sponsorship and are mainly concerned with content, not volume (van Dalen, 2018).

### Box 2. Case study from Finland

The 2015 amendment to the Finnish alcohol law bans outdoor advertising, while radio and TV are only allowed to broadcast advertising for alcoholic beverages after 22.00. In addition, the amendment introduces online advertising restrictions. Use of prize competitions and marketing lotteries and sharing of advertisements on social media are all banned.

Marketing of alcoholic beverages is now prohibited if the advertising **commercial operator in an information network service administered by itself** uses any textual or visual content produced by consumers or places into the service textual or visual content, produced by itself or by consumers, which is **intended to be shared** by consumers (Montonen & Tuominen, 2017).

In other words, brands operating in social media are not allowed to use user-generated content or to produce content that is explicitly intended for sharing. In this respect, Finland stands as a pioneer in targeting alcohol advertising in social media landscapes.

User-generated content means, for example, pictures that social media users have shared online; reviews and appraisals they may have written about products; or funny videos they may upload when (for example) enjoying a specific alcoholic beverage. Brands are not allowed to use and share this kind of content.

An evaluation of the law shows that it has worked well in at least three respects (Katainen et al., 2018).

1. Updated legislation and more specific online regulations make alcohol producers, and other brands operating in the national alcohol market, more aware of how they need to manage and supervise their social media sites, monitoring what happens there and being responsible for how they communicate on these platforms. Simply put, the law has **improved awareness** and **imposed more thorough control** over messages published on social media brand platforms operated by alcoholic beverage producers.
2. Banning user-generated content lays down an important marker in terms of principle, as it **prevents citizens from being employed as free marketers** on behalf of commercial enterprises.
3. A comparison of content on social media in Finland and Sweden reveals that the recently introduced Finnish social media regulations seem to have **combated the increasing trend of publishing user-generated content, competitions and lotteries**. No similar reversal of the trend was seen in Sweden. The study has some limitations, as it looks only at a single sample month from each year studied. Furthermore, Finnish and Swedish brands tend to differ in the content they post online.

Protection of young people is most explicitly, and probably most effectively, taken into consideration in the jurisdictions of Ireland, Finland and Lithuania.

## 7. POLICIES IMPOSED BY SOCIAL MEDIA COMPANIES

When using social media platforms, alcohol marketers must comply not only with national legislation and self-regulatory rules set by the alcohol industry but also with policies established by social media companies. Facebook and Instagram require that all alcohol advertisements must be in line with national legislation and industry codes. Pages that promote the sale of alcohol and other regulated goods must restrict access to users of 18 years and over, and when national law so requires, age verification (age-gating) should be set higher. For example, alcohol advertisements intended for a Swedish audience must be targeted at users of 25 years and older (Facebook, 2018).

Twitter also has stipulations about alcohol advertising on its platform – for example, it prohibits advertising of alcoholic beverages and related items to minors (Twitter, 2018). There are also some country-specific rules: for example, online sales and branding advertisements for alcoholic beverages with an alcohol strength above 22% are not allowed in posts targeted at Finnish audiences.

Branding and promoting the sale of alcohol is permitted on YouTube, but according to YouTube guidelines, alcohol advertisements must be in compliance with laws and industry standards, and never target individuals below the legal drinking age (YouTube, 2018). The restrictions also apply to the promotion of products that resemble alcoholic beverages, such as non-alcoholic beer, wine or cocktails.

## 8. MONITORING PROTOCOLS

Alcohol marketing arose as a question in the European public health context almost two decades ago, when youth-targeted alcopop products raised awareness at the EU policy level. Soon afterwards, preparations for the EU's first alcohol strategy (2006–2012) began. Between 2005 and 2015 the European Commission co-funded some investigative research projects on the subject of alcohol marketing in Europe; it also invested in the founding of the European Centre for Monitoring Alcohol Marketing (EUCAM), based in the Netherlands. Both EUCAM and the Brussels-based European Alcohol Policy Alliance (Eurocare) have monitored and reported on marketing practices. Both were involved in the AMMIE (Alcohol Marketing Monitoring in Europe) project, working with nongovernmental organizations (NGOs) from Bulgaria, Denmark, Germany, Italy and the Netherlands to monitor alcohol advertising practices and marketing activities in 2010. The project, which started in 2009 and was partly funded by the European Commission, published a project report in 2012. In eight concluding recommendations, the report stresses the importance of gaining a coherent grasp of marketing in its many manifestations, focusing on restricting volume instead of content, and introducing statutory regulation instead of self-regulation. The conclusions also called for systemic monitoring of alcohol marketing (de Bruijn, van den Wildenberg & van den Broeck, 2012).

In 2012 the first report on the application of the AVMSD indicated that further investigations were necessary to assess the exposure of minors to commercial communications for alcoholic beverages (European



Commission, 2012). In 2015 the results of the *Study on the exposure of minors to alcohol advertising on linear and non-linear audio-visual media services and other online services, including a content analysis* were published (European Commission, 2015). The report, which covered nine European countries in all, comprised a wide range of elements, including a literature review, a mapping of exposure to alcohol advertising of different kinds, and a content analysis that developed an analytical grid based on the content of the AVMSD. The research showed that viewers perceived a quite substantial level of exposure. The results also indicated that recall, and thus perceived awareness of alcohol advertising, increase with both age and online activity. The respondents aged 9–17 were also asked if they could describe an alcohol advertisement they had recently seen and 23.6% of these minors answered that they had.

Since the European ELSA project (2005–2007), which focused on “enforcement of national laws and self-regulation on advertising and marketing of alcohol”, there have been no fully developed protocols for systematically collecting data on alcohol marketing across the whole of Europe. The closest is EUCAM’s online watchdog service platform. While NGOs have networks in place that keep track of policy changes and communicate internally about them, there is a need for systemic collection of comparable datasets for state-of-the-art evaluations that meet new big data requirements (e.g. FORUT, 2017). In the area of marketing of HFSS foods and non-alcoholic beverages, the picture looks different: there are two recently developed monitoring tools available for Member States to keep track of the extent and content of marketing of such commodities to children.

In 2016 WHO published *Monitoring food and beverage marketing to children via television and the Internet: a proposed tool for the WHO European Region* (WHO, 2016). The aim of the tool protocol is to provide the basis for monitoring work that seeks to quantify the extent and nature of children’s exposure to marketing for HFSS foods via TV and the internet. The tool, which was updated in 2019 (WHO, 2019), is available to all Member States and includes straightforward instructions on data collection and coding as well as policy prerequisites such as age verification systems coupled with tagging of marketing campaigns that accurately identify products inappropriate for young age groups.

In 2018 the Nordic Council of Ministers published a joint Nordic monitoring protocol for marketing of HFSS foods and beverages to children and young people (Nordic Council of Ministers, 2018). The aim of the protocol is to gain a shared understanding among the Nordic countries of how to study and understand marketing of these products to young people; and also to provide a way of gathering and analysing data that produces comparable results and allows long trends to be studied.

The protocol strives to map out two different kinds of marketing: (i) marketing that appears to be directed at children; and (ii) marketing that children are exposed to, actually and potentially, in several different media contexts. The protocol aims to describe how to collect data that will answer the following research questions:

1. To what degree are HFSS foods and beverages marketed as a proportion of marketing overall?
2. To what degree are HFSS foods and beverages marketed as a proportion of overall food and beverage marketing?
3. What proportion of HFSS food and beverage marketing is directed at children and young people?
4. What proportion of HFSS food and beverage marketing are children and young people exposed to?
5. What type of HFSS foods and beverages are marketed to children and young people?
6. What marketing techniques are used to market HFSS foods and beverages to children and young people?

### Box 3. Current marketing monitoring tools

Tools for monitoring marketing of HFSS foods and non-alcoholic beverages that are directed at children were developed by WHO in 2016 (updated in 2019 to include alcohol exposure) and the Nordic Council of Ministers in 2018. Both protocols provide detailed instructions on how to proceed with data collection, which media channels to monitor and how to code the material.

Protocols like these allow countries to gain a shared understanding of the nature of HFSS marketing and to obtain comparable datasets illuminating the extent of the phenomena involved. A corresponding joint initiative in the field of alcohol marketing is highly recommended.

## 9. CONCLUSIONS AND RECOMMENDATIONS

Guarding and prioritizing the health and well-being of citizens, especially children and adolescents, and protecting them from exposure to harmful products are in the interests of all governments; this has successfully been done for tobacco (WHO, 2003). At a global level, researchers have made several proposals, including a binding treaty similar to the one adopted for tobacco, and the development of a non-binding international alcohol marketing code. The latter would recommend limiting the promotion of alcohol to certain media and putting restrictions on alcohol sponsorship and product placement, as a form of assistance to governments in strengthening marketing policies capable of protecting vulnerable populations from the adverse impact of alcohol marketing exposure (Esser & Jernigan, 2018).

As a public health concern, regulation of alcohol marketing is a question of political will. While many European countries still only have non-statutory alcohol marketing regulations, new digital marketing is posing further challenges for public health policies. Globally synergized, interactive and multimodal campaigns with material ranging from games, YouTuber branding, competitions, quizzes and video clips are difficult to discern and to monitor, and they are difficult to translate into objects of effective legislation and supervision. However, as such campaigns are global in nature, countries can unite in a common interest to produce knowledge and effective controls that can serve public health work across borders.

The issue of restricting content on social media largely revolves around the question of how we define advertising in online environments. We are no longer dealing with traditional commercial messages like "Buy this beer for €5!", and new native advertising techniques can be hard to detect for children and adults alike. It is sometimes difficult to discern the commercial interests and senders behind messages (Taylor, 2017). Since almost everything published on social media by an alcoholic beverage brand helps to build the brand and boost consciousness of the brand, the separation of advertising from editorial messages has turned out to be a complex task as well.

Some aspects of regulation are still translatable from older media principles – for example, content can still be restricted and age limits can still be enforced online. However, a large proportion of what is published cannot be neatly compartmentalized in traditional advertising terms. If a country chooses to restrict certain elements of posts, resources need to be earmarked for development of control tools, supervision and enforcement.



Proper enforcement should include consequences of violations and effective penalty systems, such as shutting down web pages and blocking content and social media profiles. Yet a more straightforward and cost-effective policy option would be to ban the presence of alcohol producers in social media milieus altogether.

Studies carried out in Finland and Sweden call for an operationalization for native advertising to be distinguished from editorial material (Katainen et al., 2018).

The internet is one of the biggest challenges for policy-makers who want to restrict citizens' exposure to commercial messages on unhealthy products. A company based in central Europe can maintain a Facebook page for an alcohol brand and publish posts in a Nordic language for Nordic audiences. In such cases, it is necessary to consider the country of effect, whatever country the company may be registered in. The problem of "country of effect" versus "country of origin" can be illustrated by Sweden's long struggle to ban alcohol advertising on TV shows broadcast from abroad that clearly targets a Swedish audience (Ekeroth, 2018). Effective global and regional collaboration between authorities is necessary for detection and enforcement of appropriate policies. In addition, increased awareness of the extensive challenges posed by online marketing, and the political commitment to deal with them, are needed throughout Europe.

#### Box 4. Policy options

WHO suggests that bans or comprehensive restrictions on alcohol advertising are one of the top three most effective and cost-effective interventions to address the harmful use of alcohol. Digital marketing should be included in such regulatory frameworks.

If a complete ban is not feasible, partial statutory restrictions on the content of posts published online should be implemented. In this case, sufficient resources should be earmarked for active supervision and robust enforcement of policies. As thousands of posts are published on a multitude of platforms daily, this is an extensive, yet crucial task.

There is an urgent need to develop a protocol to help distinguish native advertising, user-generated content and other commercial messages that may be difficult to understand or interpret. The real senders of such material are likely to be invisible to consumers, especially young consumers and children.

As many young people participate in social media milieus as a natural part of their everyday life, the very least a jurisdiction should do is to demand that alcohol brands properly enforce age verification (age-gating). Implementation of age limits on (for example) Facebook and Instagram pages is technically a small and straightforward matter. This is the least that should be expected to protect children and teenagers, and to ensure that underage users do not gain access to alcohol-related posts.

Member States should take a consistent stance on the legal obligation of marketers to accurately tag media content and ensure that inappropriate content does not reach children.

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BEST  
BUYS



## The WHO Regional Office for Europe

The World Health Organization (WHO) is a specialized agency of the United Nations created in 1948 with the primary responsibility for international health matters and public health. The WHO Regional Office for Europe is one of six regional offices throughout the world, each with its own programme geared to the particular health conditions of the countries it serves.

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Belgium  
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### World Health Organization Regional Office for Europe

UN City, Marmorvej 51, DK-2100 Copenhagen Ø, Denmark  
Tel: +45 45 33 70 00 Fax: +45 45 33 70 01  
Email: [eurocontact@who.int](mailto:eurocontact@who.int)  
Website: [www.euro.who.int](http://www.euro.who.int)