



“They’ll Drink Bucket Loads of the Stuff”

Introduction

As part of its 2009 investigation into the conduct of the UK alcohol industry, the House of Commons Health Select Committee obtained access to internal marketing documents from both producers and their advertising agencies.

These reveal major shortcomings in the current self regulatory codes covering alcohol advertising. Specifically, the codes do not, as they are supposed to, protect young people from alcohol advertising; prevent the promotion of drunkenness and excess; or the linking of alcohol with social and sexual success. Nor do they even attempt to address sponsorship, and the documents show this is being systematically used to undermine rules prohibiting the linking of alcohol with youth culture and sporting prowess. Finally, the codes are extremely weak in their treatment of new media which are rapidly become the biggest channel for alcohol promotion.

The result is a regulatory system that is impossible to police and vulnerable to exploitation.

Main Findings

1. Young People and the Next Generation

Young people are a key target for the alcohol advertisers. Whilst for the most part the documents refer to this group as starting at the LDA (legal drinking age, ie. 18), this distinction is lost on a number of occasions. Thus market research data on 15 and 16 year olds is used to guide campaign development and deployment, and there is a clear acknowledgement that particular products appeal to children (Lambrini for instance is referred to as a “kids’ drink”). Many references are made to the need to recruit new drinkers and establish their loyalty to a particular brand: WKD, for instance, wants to attract “new 18 year old lads” and Carling takes a particular interest in becoming “the first choice for the festival virgin”, offering them free branded tents and a breakfast can of beer (“a great way to start the day”). Campaigns aspire to be associated with and appeal to youth: Carling wants to “become the most respected youth brand (overtaking Lynx)”, new media channels are used because they will appeal to and engage young people, and Lambrini’s 2007 TV campaign set out to be “a cross between myspace and High School the Musical” (A Disney Channel original movie targeting 6 to 14 year olds).



Students are a particularly promising market segment; as a Smirnoff presentation expresses it, a *“great place to create excitement and drive recruitment is within the student community”*, and Carling agrees, proposing a *“greater focus on students as core recruitment audience”*. The latter aim turned into a sponsored customised magazine for first year students - including ones at Scottish universities, where a significant proportion of freshers will be under the legal drinking age.

2. Drunkenness, Potency and Excess

Producers are well aware that segments of their market do drink irresponsibly. Brand strategy documents and campaign briefs abound with references to *“unwise”* and *“immoderate”* drinking: *“getting pissed”*, *“blasted”*, *“things get messy”*. Far from regretting or avoiding any promotion of this behaviour as the codes require, producers and agencies analyse it for market opportunities. When developing a brand positioning for Sidekick, for instance, explicit reference is made to shots being *“used to crank up the evening, accelerate the process of getting drunk with less volume of liquid”*, while Smirnoff *“have identified the ‘9pm switch’ [when young men start to feel “bloated” with beer] as an opportunity to target male LPA-29 drinkers”*. Similarly Lambrini’s qualitative research with young women provided respondents with stimulus themes such as *“getting pissed”*, *“one night stands”* and *“drinking games”* to help them discuss their experiences with the product.

The aim of attracting new generations to drinking has already been noted; there is also a clear desire to increase the amount being drunk, as in the Smirnoff strategy document for *‘Introducing next generation growth for vodka in the On-Trade’* which goes on to note the opportunity *“to increase consumption of vodka by mates within the mid-tempo part of the evening”*. Similarly Lambrini is seeking *“more light users that they can move up the consumption scale”*, and a WKD brief overtly states that it wants the target group to switch to its product *“as a change of pace when beer is getting a bit much for me”* - surely a point when any responsible advertiser would want customers to stop drinking for the evening, not speed up. In addition, the focus on category sales and increasing consumption completely contradicts the oft stated argument that alcohol advertising is aimed simply at encouraging brand switching and increasing brand share.



Drunkenness is also linked to high alcoholic strength - and reference to this is forbidden by the codes. Yet Smirnoff has deliberately worked out that *“potency can be communicated in a number of ways by Smirnoff”* - including by reference to its being *“ten times filtered or triple distilled”*, noting that *“for the consumer both result in increased purity and therefore increased strength”*. This theme is currently given heavy coverage on the Smirnoff website and provides a good example of how an apparently innocuous appeal is, in the light of the planning documents, clearly in contravention of the codes - but has heretofore escaped censure.

3. Promoting Sociability and Social Success

Advertisers are not allowed to suggest that alcohol can enhance the social success of either an individual or an event - yet the documents are full of references to brands doing both things. Thus Carling is described as a *“social glue”* by its promotion team, and the brand overtly seeks to *“own sociability”*, as this is the way to *“dominate the booze market”*.

Lambrini is described as a *“social lubricant”* in a creative brief for a summer campaign, and the ‘Brand Key’ for the product, produced just last year, positions it as *“the perfect start to the night”*, whilst the *“essence”* of the brand is to *“make the night sparkle”* and the brand *“promise”* offers *“the best way to make your night light, bubbly and full of flavour”*. Similarly, for WKD, the single most important message to convey to consumers is that the brand *“is all about having a laugh with your mates”*.

Efforts are also made to associate brands with personal transformation and enhancement. Thus Penka vodka *“releases my Super Me. Why? Because when I drink it, I feel I am in the know and part of an elite group”* and Lambrini *“can make you and the girls forget your dull working week and transform you into the glamour pussies you know you should be”* - a theme that is neatly reinforced by its sponsorship of Colleen’s real Women (see Section 5 below).

4. Appealing to Masculinity and Femininity

Suggesting that alcohol can enhance either masculinity or femininity is outlawed, yet the documents are full of references to both. Thus the need to *“communicate maleness and personality”* is noted as a key communications objective for the WKD brand, and Diageo highlights the brand values and personality of Smirnoff Black



as ‘urbane’, ‘masculine’ and ‘charismatic’; dictionary definitions of these characteristics are accompanied by photographs of George Clooney, Bono and Ewan McGregor. Masculinity is often equated with drinking too much (as in the Carling Commandments, which include “*thou shalt never abandon thy mate in drunken distress*” and “*thou shalt never miss a round*”), alcoholic strength (“*potency is key to delivering masculinity*”) and bravado (as with Sidekick’s “*Kick starting the night... macho competitiveness; game playing - how much can you take*”).

Similar sexual stereotypes and appeals are found in campaigns aimed at female drinkers: in 2006, Lambrini teamed up with Pretty Polly tights to run a promotion to find the “*Lambrini girl*” with “*the UK’s sexiest legs*”.

5. Sponsorship

This is not specifically addressed by the codes, yet it is a large and powerful part of alcohol promotion. Sponsorship is a way of raising brand awareness, creating positive brand attitudes and building emotional connections with consumers. Its power comes not from direct advertising messages but through associating the brand with an already engaging event or celebrity, and gaining power and credibility in the process. A Carling document again sums this up very neatly when discussing its music sponsorship campaign: “*Ultimately, the band are the heroes at the venue and Carling should use them to ‘piggy back’ and engage customers’ emotions*”.

Although the codes prohibit any link between alcohol and youth culture or sporting achievement, the documents discuss in detail sponsorship deals with football, lad magazines and music festivals. Often the intent of such sponsorship is specifically to reach the young: Carling’s sponsorship of the Carling Cup Final is a way to “*recruit young male (LDA-21) drinkers into the brand*”, and, as noted above, it sponsors music festivals which appeal to “*festival virgins*”. Events are chosen to demonstrate how well the brand understands and relates to young people: as one Carling executive expresses it, “*They (young men) think about 4 things, we brew 1 and sponsor 2 of them*”.

Through sponsorship, producers seek to build emotional connections with consumers by enhancing the event experience. It affords opportunities to use the full marketing mix: Carling’s music sponsorship deals include free branded tents



for ‘festival virgins’, free cans of beer, free t-shirts and comfort kits, and a free laundry service.

Because sponsorship is not explicitly covered by the codes, producers can take advantage of the ambiguity regarding its regulation. Two particularly interesting examples of this are WKD’s sponsorship of the Nuts (a blatantly sexual lad’s magazine) ‘football awards’, which it argued to the Committee did not transgress rules prohibiting the association of alcohol with sporting or sexual success, and ITV’s sponsorship of the show ‘Coleen’s Real Women’, featuring Coleen Rooney. In the latter case, although the use of (then) 23-year old Coleen was in direct contravention of the codes stating that models should not look or be under 25, and despite cautions from regulatory advisers that it was “*very likely to breach the Code*”, the show went ahead on ITV2 because technically it qualified as sponsorship, not advertising.

6. New Media

New media are a fast-growing channel for alcohol advertising, currently running neck and neck with television and set soon to outstrip it. Websites, email, viral marketing and other forms of new media offer alcohol producers ways to engage with consumers more interactively and with more freedom.

They are covered by the codes, but the rate of innovation and especially the amount of user generated and transmitted content present particular problems. Viral campaigns, for example, deliberately set out to encourage young people to pass on messages to their friends, and there is no way of controlling who receives them. The aim is to gain credibility by making it seem as if the message is from a trustworthy friend rather than a company (“*It should look like it’s come from your mate, but is in fact Carling branded*”) - but the mate in question may be under 18.

One producer recognised that this presents a dilemma: an evaluation of Smirnoff’s Facebook presence showed that almost three quarters of its contacts are in significant danger of breaching the Diageo Marketing Code (i.e. are underage); at the same time, however, Smirnoff continues to do all it can to boost its presence on the site. Others are less reticent, and welcome the fact that new media “*allow us the greatest creative freedom*”, give access to “*‘Young and Energised’ consumers who engage in new technologies and gadgets, always looking for the new things*



to tell their mates about and share on their Facebook/Twitter” and, more ebulliently, offer “routes to magic”.

The only control on access to alcohol-related sites is the need for the user to provide an adult date of birth on an age-verification page. When it was pointed out to an agency representative during the evidence sessions that someone under age could easily access the WKD website by entering a false date of birth (even a date of birth which does not exist, such as February 29th in a non-leap year), the representative replied that there is little the industry can do if children make a “wilful choice to lie”.

7. Regulatory Failure

The documents demonstrate that attempts to control the content of alcohol advertising suffer from two systemic failings. First, the sophisticated communications and subtle emotional associations such as ‘sociability’ and ‘masculinity’ that comprise modern advertising (and sponsorship) often defy intelligent analysis by the regulator. Second, producers and agencies can exploit the ambiguities in the codes and push the boundaries of both acceptability and adjudication.

The first problem is illustrated by Carling’s ‘Belong’ commercial, which featured a flock of starlings recreating the word ‘belong’ in the style of the Carling logo. The ASA received complaints from professionals and the general public that the ad breached the code, but rejected them saying that the ad “*did not imply alcohol contributed to the popularity of an individual or the success of a social event*”. However the internal planning documents for the campaign state categorically that “*Carling celebrates, initiates and promotes the togetherness of the pack, their passions and their pint because Carling understands that things are better together*”. They go on to specify “*3 Aspects of ‘Belonging’... Initiation: Expressions of the moment when an individual joins a group and finds a happy home in the pack - The Moment of Belonging. Celebration: An expression of the sheer joy of belonging - The Joy of Belonging. Contagion: An expression of the magnetic power of the group - The Power of Belonging*”. The documents proceed to emphasise the importance of advertising in getting these themes across: “*Broadly speaking each piece of communication will either; celebrate ‘Join Us’, by championing the benefit of togetherness, or facilitate ‘Join Us’, by providing and enhancing experiences where togetherness is key*”.



The second problem of pushing the boundaries is well illustrated by Lambrini's tenacious attempt to retain the strapline 'Girls Just Wanna Have Fun' in the face of repeated advice from the regulator that it is "*targeting young girls, and promotes getting pissed*", and therefore unacceptable. Only when a young woman died after a Lambrini drinking binge and the strapline appeared in newspaper coverage of the death did Lambrini feel there might be benefits in relinquishing it.

The cynicism of this example is palpable, but even more worrying is what it says about the weakness of alcohol regulation in the UK. The notorious strapline, which the regulator condemned so trenchantly in 2007, had actually been used by Lambrini since 1999 in a wide range of media without any let or hindrance. Its website boasted in June 2009 - where the offending campaign was still being streamed - that during these eight years it had been used on everything from television ads to Blackpool taxi-wraps.

Conclusion

It is clear, then, that the background thinking and strategising revealed in the documents encompass many prohibited themes, including drunkenness, sex, social success and masculinity and femininity - which are then incorporated into advertising in ways that do not obviously transgress the codes. Sometimes this gamesmanship is all too obvious: the proscription of using Coleen Rooney, who at the time was only 23, in advertising for Lambrini is converted to the sponsorship of her television show Coleen's Real Women.

In other cases the subterfuge is more subtle, as when Carling's planning documents reveal that its aim is to position the brand as a "*social glue*" and that it "*celebrates, initiates and promotes the togetherness of the pack, their passions and their pint because Carling understands that things are better together*" - then goes on to communicate this in a TV ad using a flock of starlings and the Carling logo recreated with the word 'BELONG'. So clever is the treatment that the regulator rejected public complaints which have now been completely substantiated by the documents.

Contact

Professor Gerard Hastings
Institute for Social Marketing,
University of Stirling &
the Open University (AL 81)

ALCOHOL INSIGHTS

Alcohol Insights are brief summaries of the findings made from research or development grants.

They may be copied and used without permission provided that the source is attributed to the AERC.

Further information about *Alcohol Insights* can be found at

www.aerc.org.uk

or email: info@aerc.org.uk

the alcohol education and research council