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***“They’ll Drink Bucket Loads of the  
Stuff”***

An Analysis of Internal Alcohol Industry Advertising  
Documents

# CONTENTS

	<u>Page No</u>
<b>EXECUTIVE SUMMARY</b>	<b>1</b>
Introduction	1
Main Findings	1
Conclusions	5
<b>INTRODUCTION</b>	<b>7</b>
<b>1. YOUNG PEOPLE AND THE NEXT GENERATION</b>	<b>9</b>
Getting Them Young	9
Freshers and Festival Virgins	12
Tapping into Youth Culture	14
<b>2. DRUNKENNESS, POTENCY AND EXCESS</b>	<b>16</b>
Getting Pissed	16
Accelerating the Process of Getting Drunk	17
Potency	20
Increasing Consumption	21
<b>3. PROMOTING SOCIABILITY AND SOCIAL SUCCESS</b>	<b>23</b>
Sociability	23
Social Success	25
<b>4. APPEALING TO MASCULINITY AND FEMININITY</b>	<b>27</b>
<b>5. SPONSORSHIP</b>	<b>31</b>
Building Brand Awareness and Recruiting the Young	32
Establishing Credibility	33
Welcome - and Well Used - Loopholes	35
<b>6. NEW MEDIA</b>	<b>40</b>
<b>7. REGULATORY FAILURE</b>	<b>46</b>
Defining the Indefinable	46
Pushing the Boundaries	48
<b>CONCLUSIONS</b>	<b>51</b>
<b>REFERENCES</b>	<b>52</b>

## EXECUTIVE SUMMARY

### 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*”<sup>1</sup>.

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.

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<sup>1</sup> A Disney Channel original movie targeting 6 to 14 year olds.

## 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 pusses 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 29<sup>th</sup> 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.

This is reminiscent of latter day tobacco advertising for brands like Silk Cut and Benson & Hedges that became more and more elliptical and imaginative as the codes on content were tightened. Judging whether the resulting references breached content codes became an impossible task. Furthermore, as David Abbott, a leading advertiser of the time, argued the codes actually act as a stimulus, not a constraint, on creative imagination.

Thus the self-regulatory codes do not protect young people; they just hone the advertiser's skills – either in camouflage or creativity.



## INTRODUCTION

It is now been established beyond all reasonable doubt that alcohol advertising – as with advertising for tobacco and fast food – does influence behaviour. A number of systematic reviews demonstrate that alcohol advertising encourages young people to drink sooner and in greater quantities<sup>1,2,3</sup>. As Anderson et al concluded:

*“Based on the strength of this association, the consistency of findings across numerous observational studies, temporality of exposure and drinking behaviours observed, as well as the theoretical plausibility regarding the impact of media exposure and commercial communications, we conclude that alcohol advertising and promotion increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol”.*

This suggests that from a public health perspective there should be limitations on the *amount* of alcohol advertising as well as on its *content*; however the UK has opted only for controls on the latter. As part of its investigation into the conduct of the UK alcohol industry, the House of Commons Health Select Committee (HSC) wanted to explore the success of this approach.

To do so it obtained access to internal marketing documents from both producers and their advertising agencies. The documents requested included contact reports between client and agency, client briefs, creative briefs, media briefs, media schedules, advertising budgets and market research reports for the financial years of 2005 to 2008. The Institute for Social Marketing (ISM) at the University of Stirling and the Open University was asked by the HSC to analyse these documents and assess how they fitted with the self-regulatory codes.

The exercise replicated one conducted for the HSC in 2000 during its enquiry into the tobacco industry, when all the major ad agencies with tobacco accounts were required to submit a similar range of documents. However, alcohol advertising is far more extensive than tobacco advertising ever was: around £800m per year compared with less than £100m; so the search had to be more circumspect. Requests were therefore sent to only four producers (Beverage Brands, Diageo, Halewood International and Molson Coors Brewing Company) and their respective ad agencies (Big Communications, Bray Leino PR, Five by Five, AKQA, JWT, Cheethambell JWT, BJL and BMB), relating to just five brands (Carling, Lambrini, Sidekick, Smirnoff and WKD) out of the dozens on their books. The companies and brands were chosen to cover a range of sectors and be representative of the industry as a whole; their inclusion should not be interpreted as suggesting that their advertising was particularly questionable or suspect – just typical. In addition to providing the documents requested, two of the companies (Beverage Brands and Diageo) sent copies of their own alcohol policies, marketing codes and procedures which they stated were also supplied to agencies they employed.

Despite the limited nature of the request it was felt to be impractically big: one producer, for instance, argued that the documentation for just one brand would run to over a million pages. In this instance the request was therefore reduced to documentation for just the 2005 and 2008 financial years for this producer.

The results of the investigation are discussed below under seven headings which reflect key themes in the codes, developments in the marketplace and the regulatory approach itself:

1. Young people and the next generation
2. Drunkenness, potency and excess
3. Promoting sociability and social success
4. Appealing to masculinity and femininity
5. Sponsorship
6. New media
7. Regulatory failure

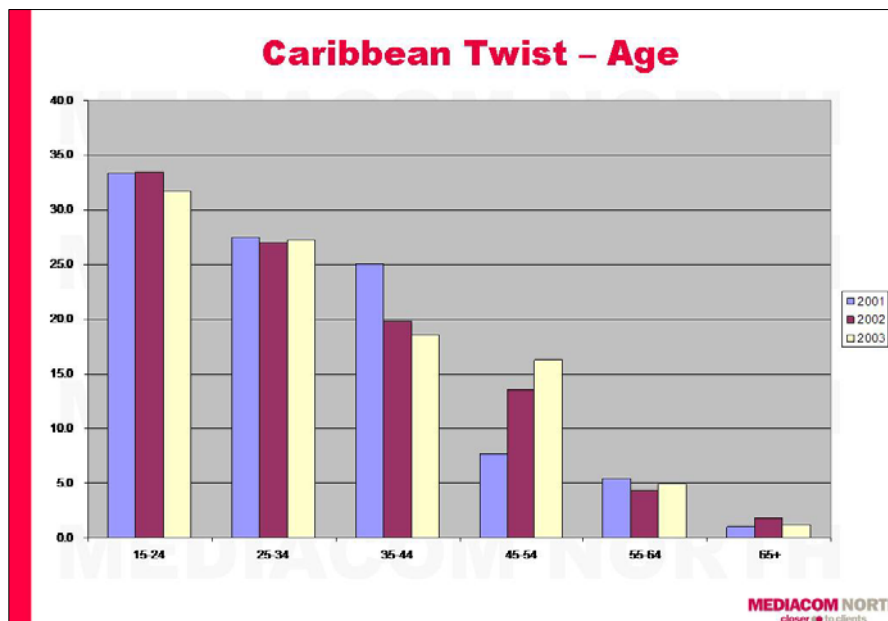
## 1. YOUNG PEOPLE AND THE NEXT GENERATION

The self-regulatory codes state that advertisements for alcoholic drinks must not appeal strongly to people under 18 or be associated with, or reflect, youth culture, and no-one who is, or appears to be, under 25 years old may play a significant role in advertisements.

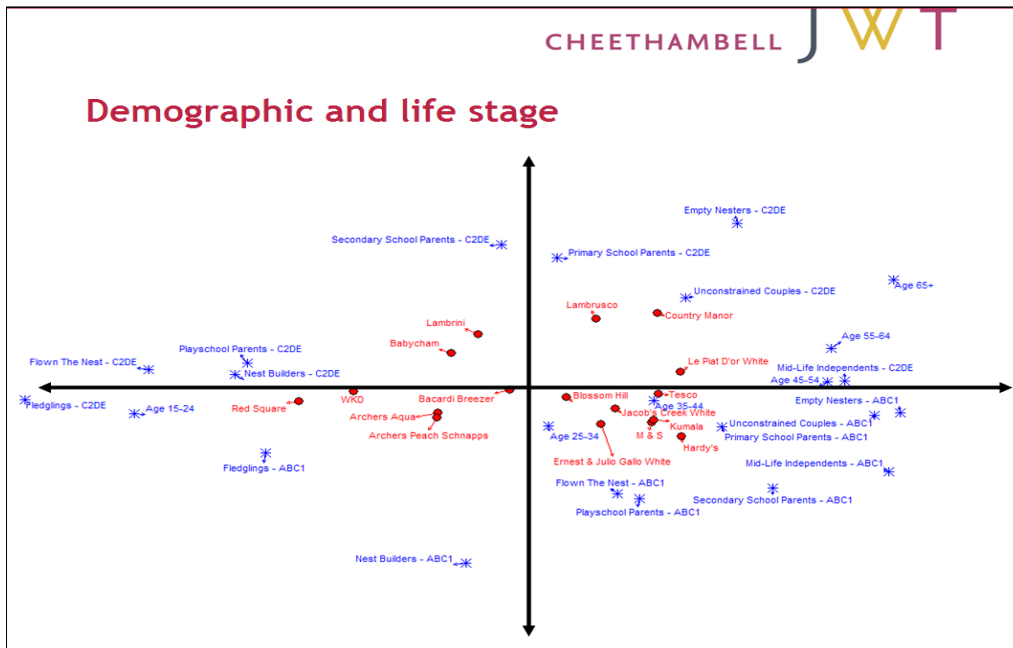
### Getting Them Young

Alcohol producers are not allowed to target or appeal to people under 18. In the documents and in their public statements, producers and agencies are generally careful to refer only to people aged 18 upwards, or to “LDA” (legal drinking age) or “LPA” (legal purchase age) drinkers.

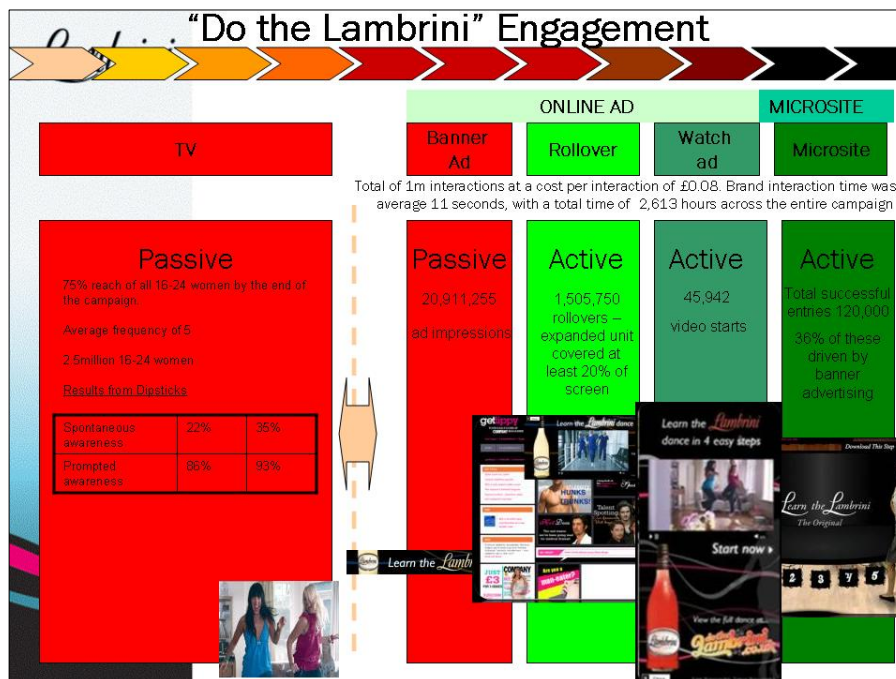
However, there is evidence that producers use market research data on children as young as 15. The slide below is part of a presentation looking at changes in the market profile of Lambrini and Caribbean Twist from 2001 onwards<sup>4</sup>. The column on the far left shows that the youngest – and largest – segment of Caribbean Twist drinkers is aged “15-24”.



Below, research profiling the different types of customers for Lambrini and its competitor products segments the market into two age groups, Age 35-44 (right hand side of middle axis) and Age 15-24 (left hand side of middle axis)<sup>5</sup>. Among the drinks plotted on the left hand side, presumably to reflect their appeal to this younger age group, are Lambrini, Babycham, WKD and Archers.



More recent market research into Lambrini measured target audience awareness of ‘Do the Lambrini’ advertising across different media, and noted for TV, a “75% reach of all 16-24 women by the end of the campaign” (red column at far left)<sup>6</sup>:



There is evidence, too, that producers are well aware that some of their brands appeal to and are drunk by young people under the legal drinking age. For example, in the Lambrini consumer research slide below<sup>7</sup>, the product is unequivocally shown to be regarded as a “kids’ drink” by the research participants, women aged 18 to 35 years – one which they themselves “drank when young”, “on the street”, and which they “assume ... is the same now”:

## Perceptions of Lambrini

- However also thought to be a 'kids' drink:
  - What they drank when young
  - And on the street
  - Assume it is the same now
- Not sophisticated:
  - Consumers
  - Or taste
  - Or image

TERESA HADFIELD RESEARCH & STRATEGY 16

Whether or not under-18 year olds are deliberately targeted, it is clear that producers are interested in the very youngest end of the legal drinking market. This is for a variety of reasons. Some brands have a constant need to replenish the customer base with new recruits. This is particularly the case with Lambrini, which faces the continued challenge of customers abandoning the brand for more 'adult'-tasting drinks as they grow older:

*“Girls grow out of Lambrini. And then turn their back on absolutely. We could maybe hold onto them a year or two longer with slightly premiumised image but we should not think about an older demographic per se”.*<sup>8</sup>

However, it is acknowledged that the problem is exacerbated by the “cheap” image of Lambrini:

*“The creative challenge will be to make Lambrini more aspirational and with-it, in order to really grasp hold of the 18-24 age group. This will be extremely difficult given its current strong perception of being cheap and down market”.*<sup>9</sup>

For other brands, the aspiration is to create interest and inculcate loyalty at a young age in order to retain customers as they mature. A 2008 SWOT analysis (strengths, weaknesses, opportunities, threats) for WKD identifies “new 18 year olds!” as an ‘opportunity’<sup>10</sup>. Smirnoff aspires, through Smirnoff Ice, to “become the most respected youth brand (overtaking Lynx)” by targeting “LPA-24 year old males”<sup>11</sup>. Research conducted for WKD concluded that there was a need to reach out to the “up and coming generation” through NPD (new product development):

*“‘Staying in’ is the new ‘going out’ and health and body awareness are growing trends in society that are impacting on the drinks market. Those unaware of the brand and to a lesser extent those aware but choosing not to include WKD in the repertoire reflect these trends. They are increasingly hard to specifically target and there is a question mark as to what value they represent for the brand. Maintaining the existing user base will be key, NPD may be needed to target the up and coming generation.”<sup>12</sup>*

Similarly, a briefing document for Carling’s 2005 to 2006 brand communication plan calls for Carling to shift focus to the very youngest group within the legal drinking age market, from “18-24” to “LDA-21”. This is in order to build a relationship with young men as early as possible, before they develop preferences for other brands:

*“...our primary target market from 18-24 year old men to LDA-21yr old men. This would potentially concentrate our efforts on young consumers (such as students) before they have crystallised their repertoire...Desired outcome: More young male drinkers recruited to the brand.”<sup>13</sup>*

Producers are also interested in young people because they spend a lot of money on alcohol:

*“The 18-24 year old’s [sic] remain the prominent Lambrini drinkers, accounting for 22% of total consumption, they are 86 times more likely to buy Lambrini than the national average”.<sup>14</sup>*

Another Lambrini document reinforces the point, stating that “18-24 is the brand’s hot spot”<sup>15</sup>. In the same vein, an outdoor advertising brief for WKD describes the intended target audience as a football-mad 18 year old ‘Craig from Hull’ who has just started his “first proper job”<sup>16</sup>.

OUTDOOR BRIEF 2009

value added thinking

big creative brief

**1** What is the creative work intended to achieve?  
(e.g. Launch a product, change perceptions, raise awareness, etc.)

Set the creative direction of wkd for 2009. Reignite the appeal and interest in the brand. Make the brand more relevant to today. Take it from a great brand of the 90's to a great brand of the 00's.

**2** Who are we talking to?  
(Build a picture of our audience: their life in relation to the product/category/brief, e.g. behaviour, attitudes, demographics, etc.)

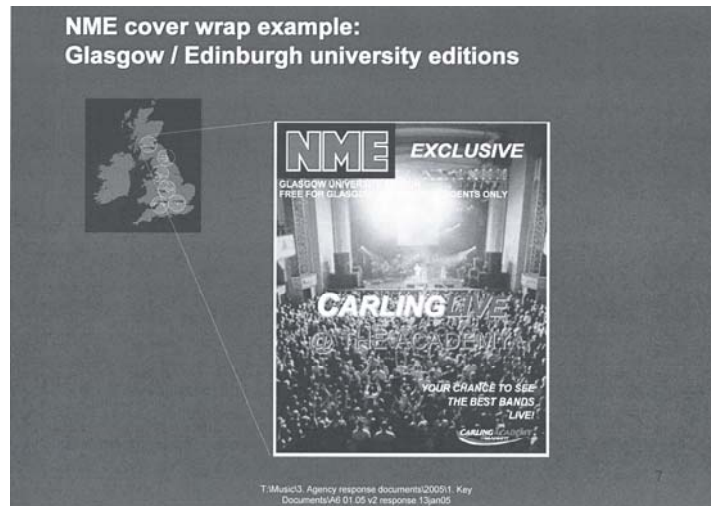
I'm Craig, 18, from Hull. I have just started my first proper job and have a girlfriend that I see three or four times a week. I enjoy socialising with friends, drinking on weekends and having a laugh with my large circle of mates. I'm probably seen as the comedian in the group as I always enjoy a good laugh. I like sport and I'm a massive football fanatic.

## Freshers and Festival Virgins

Perhaps not surprisingly, a key target group for several brands is university ‘freshers’ – first year students. WKD defines its typical audience as “Aged 18-25 chavs and students” in a TV

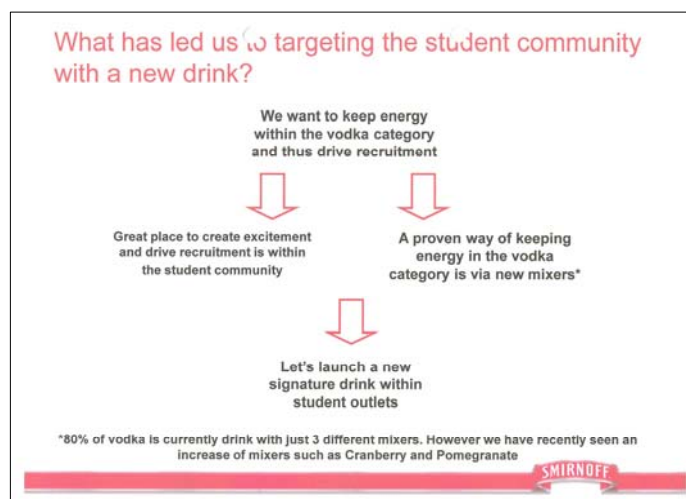
campaign brief<sup>17</sup>. Similarly, proposals for the Lambrini brand in 2004/5 aimed at it “becoming a national institution” and suggested a “Launch in fresher’s week to act as hit on students?”<sup>18</sup>.

Students are also a key target group for Carling, which proposed a “Greater focus on students as a core recruitment audience” as part of its 2005 Brand Plan<sup>19</sup>. One campaign proposed a Carling-sponsored exclusive edition of NME magazine for first year students, “bespoke” tailored to each university in which it was distributed, including Glasgow and Edinburgh universities<sup>20</sup>.



As students can start university at 17 years of age in Scotland, this campaign would have reached a large proportion of young people under legal drinking age.

Similarly, Smirnoff recently identified the “student community” as an ideal place to recruit new customers using a novel ‘signature’ vodka drink. Student consumer group tasting sessions were conducted with Smirnoff vodka combined with different mixers<sup>21</sup>:





And:

*Youth “RECRUIT VIA THE STUDENT COMMUNITY  
- Generate excitement via signature drink & cabaret in NUS and student  
bars”<sup>22</sup>*

Another key route for reaching youth is through music. Again, Carling is active in this area. One of its motivations for sponsoring the ‘Carling Weekend’ music festival was that it was often the “*first choice for the Festival Virgin*” (first time festival attenders). The festival sponsorship strategy was designed to enhance the experience for festival goers and for “*virgins in particular!*” in order to build their relationship with the brand<sup>23</sup>. This is discussed further in Section 5: Sponsorship.

## Tapping into Youth Culture

Producers’ interest in reaching consumers as early as possible is reflected in the terminology used in marketing documents to describe target customers, where references to “*lads*”, “*young lads*”, “*boys*” and “*girls*” abound. The language, style, tone and imagery of campaigns are often carefully chosen to appeal to the youngest end of the market. For example, the brand name WKD is suggestive of text speak for ‘wicked’, as in the strapline “*Do you have a W – K – D side?*”. A creative brief for non-TV advertising for WKD outlines the brand’s aspiration to talk to young people in their own language and tap into their style of humour:

*“How should the brand communicate? ... The brand should talk at the level of the target audience – young people”. “Funny is the most important thing, ... not take itself too seriously, fresh, witty, a funny brand that doesn’t take itself too seriously”<sup>24</sup>.*

A perfect example is Lambrini’s “Girls Just Wanna Have Fun” strapline, which appeals to youth (girls) and youth culture (the pop song ‘Girls just wanna have fun’) and implicitly links alcohol with the success of a social event (have fun). This was first introduced in 1999 and was used in many different media before being finally banned by the regulator in 2005 for suggesting underage drinking and drunkenness. As the regulator explained “*we thought saying ‘girls’ was wrong as that implied women under 18*”. Section 7 explores this more fully.

When media buying, producers and agencies choose channels and programmes which will deliver the highest numbers of viewers in their desired target segments. In order to reach youth, this means selecting on the basis of appeal and reach to young people. Media buying for a 2007 Lambrini television campaign chose slots on the basis of ratings and opportunities to see (OTS) for women aged “*16-34*”<sup>25</sup>. Magazines are chosen on a similar basis.

New media provide an ideal platform for reaching youth, and many brands have moved into this arena in the past few years as a way of building awareness and relationships with young consumers (see also Section 6). Social networking sites such as Facebook and sites with user-generated content such as YouTube provide an ideal opportunity to engage with young consumers. For example, an email received by Halewood International, the producers of Lambrini, from BJL (their ad agency) outlines how to “*benefit the brand’s social media*



presence” “for a youth audience” by ensuring that “material is appropriate for small screen views” and harnessing young people’s “shared interest in style on our face-book page or own website”<sup>26</sup>:

From:	BJL	Sent:	Thu 11/12/2008 09:46
To:	Halewood International		
Cc:			
Subject:	RE: Belated Thankyou		

I'm keen we ensure Lambrini has an appropriate social media presence also and have a session [...] on Friday to finalise a proposal.

In the meantime, here is my summary of what I feel we could do to benefit the brand's social media presence:

TV for mobiles - if this is a growth area for a youth audience, can we ensure our material is appropriate for small screen views. Can we aggregate relevant content to support their shared interest in style on our face-book page or own website, responding to the rise in consumers who can't be bothered digging for content or visiting multiple sources. Hints and tips are always popular (one of youtube's most popular clips last month was a make-up demo!)

[...]

Similarly, a WKD strategy document in 2008-2009 proposed a move towards less regulated media as a way of reaching its target youthful audience with more “playful”, “cheeky” and “in-your-face” communications:

*“TVRs [Television Rating Points] alone are not the answer. Taking a more tactical approach to the media mix could help maximise and sustain awareness by reaching a broader base within your target audience (we already know there is an untapped group of non-users within your target audience):*

- *Online marketing*
- *Capitalising on playful and cheeky image to develop more in-your-face/risqué PR and outdoor ad campaigns that will support the TV activity and drive WOM [word of mouth]*
- *Sponsorship of music / entertainment events targeted at the 18-24s*<sup>27</sup>

In 2007, Lambrini developed a TV ad around ‘jump dancing’, a dance style associated at the time with “urban male teenagers”<sup>28</sup>. Keen to make the dance style more relevant to Lambrini’s young female audience, proposals emphasised that the dancing featured in the ad would be “much more girly and not as aggressive (cross between myspace and High School the Musical)”<sup>29</sup>. The choice of reference points is revealing – High School Musical is a Disney Channel Original Movie; the channel’s target audience is 6 to 14 year olds.

Part of the appeal of new media is that the regulations are less comprehensive than for traditional media, and it is much harder to control under-age viewers’ access to and uses of content. In Section 6 below, we show how the age controls on alcohol brand websites are often tokenistic and easy to circumvent.

## 2. DRUNKENNESS, POTENCY AND EXCESS

The self-regulatory codes state that advertising must not link alcohol with brave, tough, unruly or daring people or behaviour; nor should it encourage irresponsible, anti-social or immoderate drinking (whether in terms of style or amount). References to, or suggestions of, buying repeat rounds of drinks are not acceptable – including any suggestion that other members of the group will buy any further rounds. Ads must not suggest that a drink is to be preferred because of its alcohol content or place undue emphasis on alcoholic strength.

### Getting Pissed

Producers are well aware that segments of their market drink irresponsibly. Brand strategy documents and campaign briefs abound with references to “unwise” and “immoderate” drinking: “getting pissed”, “blasted”, “things get messy”. In the words of one creative brief for Lambrini, the brand’s target audience is:

*“Younger female drinkers on a budget. Girls who like a drink and a laugh and who get a lot out of nights out (or in) with mates because it is a big release. They stay in Monday to Thursday, they watch soaps, they clip coupons, some have kids, some don’t. They could be 18 but they could be 38 and acting 18. The main thing is that Friday to Sunday they have FUN. Having a laugh and getting a bit pissed is a big part of their life.”<sup>30</sup>[Emphasis added]*

Producers commission detailed consumer research to help them really get under the skin of their target audience. In one such exercise, funded by Lambrini to help identify its key market segments, the young female participants were asked to construct ‘mood boards’<sup>31</sup>. Helpfully, they were provided with the expressions “getting pissed”, “pole dancing” and “drinking games” already typed out for them on pieces of paper.



There is a clear connection in these consumers’ minds between unwise and immoderate drinking behaviours – getting pissed, drinking games – and sexually irresponsible behaviour such as one night stands. The fact the Lambrini went on to make ads called “Thong” and “Tit tape” suggests that this insight was not wasted on the creative team. A creative brief for a Lambrini campaign in 2007 admits that the brand has sought deliberately to be associated with bad behaviour, through “quick female gags based on sex and drunkenness” and ‘aligning itself’ with concepts such as “being naughty, rude, outrageous or badly behaved”:

*“The 10”[10 second advert] strategy worked previously because we could do quick female gags based on sex and drunkenness, we also had multiple executions”<sup>32</sup>.*

*“But fun doesn’t have to be being naughty, rude, outrageous or badly behaved (all outdated concepts Lambrini has previously aligned itself to).”<sup>33</sup>*

## Accelerating the Process of Getting Drunk

In a series of proposals for positioning the Sidekick brand (a shot product designed to be drunk like a chaser), explicit reference is made to shots being *“used to crank up the evening, accelerate the process of getting drunk with less volume of liquid”<sup>34</sup>*. The intended benefit for the consumer is that shots can get them “blasted” more quickly and efficiently, without having to drink too much inconvenient liquid.

Kick starting the night

- Shots used to crank up the evening, accelerate the process of getting drunk with less volume of liquid
- Sense of danger, interactive, speed, risk, a game
- For a pleasure ride...or to get blasted
- Often used at weekends/late evening
- Macho competitiveness; game playing - how much can you take?
- Self-inflicted punishment

CHEETHAMBELLJWT

There are also clear references here to daring and machismo – banned under the codes (see also Section 4) – in the alarming references to *“sense of danger”, “macho competitiveness”* and *“game playing”*. The blatant challenge *“how much can you take?”* reveals a deeply irresponsible attitude to drinking.

A creative brief for the Lambrini 2005 campaign describes the target as young women (18-24) who are *“on a budget when it comes to booze”* and for whom Lambrini is:

*“A light easy to drink affordable (wanna be wine) that gets their nights out or in off to a good start. They’ll drink bucket loads of the stuff and still manage to last the duration.”<sup>35</sup>*

The same creative brief continues with this insight:

*“Drinking starts early! Early afternoon at the weekend or straight after work Monday to Friday meeting your girly mates and getting on it is the only way forward.”*

The theme of “*drinking early, drinking often*” also features in an overview of the shots drink Sidekick designed to guide thinking about the future of the brand<sup>36</sup>. It tells the story of a binge drinking session, the “*Big Night!*” which begins at 5.30pm with the purchase of “*shots on impulse*” on the way home from work, then continues with “*necking a few shots between beers/wines*” at home to “*start night off*”. At 9pm it is into town where there are “*drinks in a few bars*” with “*shots in between rounds*”, then, at 11.30pm it is “*off to a club*” where (perhaps not surprisingly) our hero is “*too full for pints so turn(s) to shots*”. The night ends ambiguously at 3am: “*Home to bed?*”

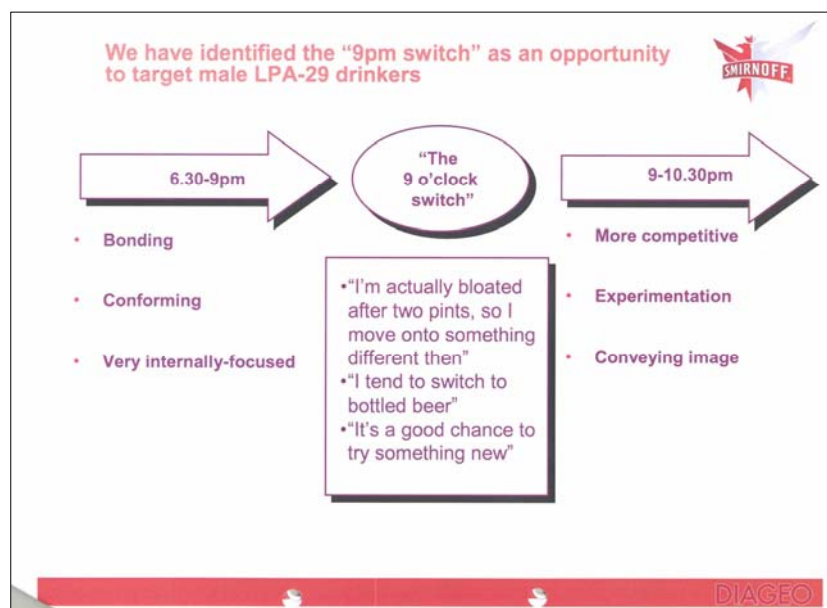


The idea of changing to another alcoholic drink “*when beer is getting a bit much*” is also highlighted in the creative strategy for WKD:

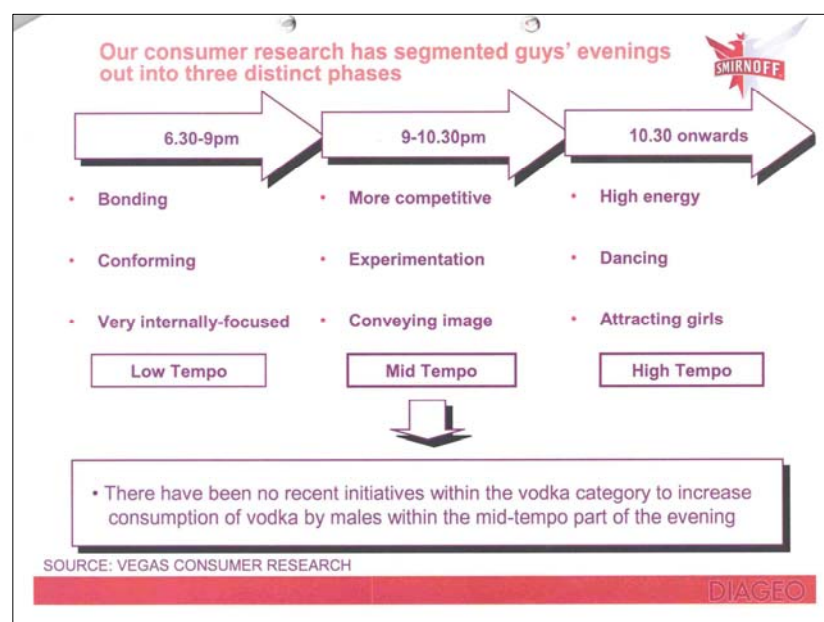
*“What do we want our audience to think, feel or do?  
I tend to drink WKD during a night out as a change of pace when beer is getting a bit much for me.”<sup>37</sup> [Emphasis added]*

The quote above suggests that producers are not only aware that their consumers may drink unwisely or immoderately, but also seek to reinforce and exploit such behaviour: the moment at which when one drink “*is getting a bit much*” is identified as the perfect opportunity to increase consumption of a different one.

This is a recurring theme in the documents. Smirnoff identifies what it dubs “*the 9pm switch*” from beer as “*an opportunity to target*” young men with vodka promotions, in a document called ‘*Introducing next generation growth for vodka in the On-Trade*’<sup>38</sup>:

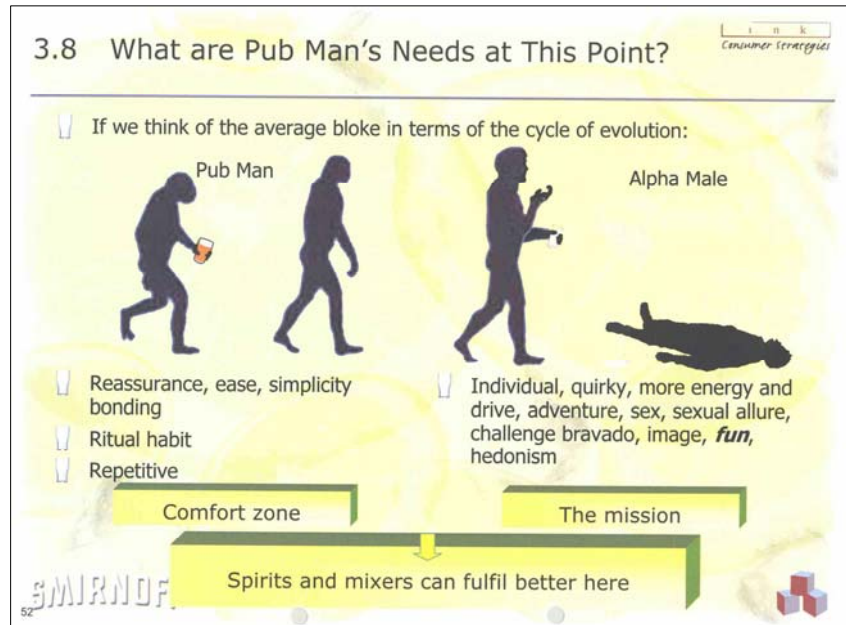


Based on detailed consumer research and analysis, Smirnoff notes how groups of male drinkers progress through distinct phases on an evening out: an initial 'bonding' and 'conforming' phase between 6.30pm and 9pm, a more 'competitive' and 'experimental' phase between 9pm and 10.30pm, and a 'high energy', 'high tempo' phase from 10.30pm onwards. The shift in energy level and mood at 9pm is identified as an ideal opportunity to move drinkers already feeling "bloated" with beer onto vodka. The document goes on to note that, "there have been no recent initiatives within the vodka category to increase consumption of vodka by males within the mid-tempo part of the evening"<sup>39</sup>: Smirnoff will fill that gap.



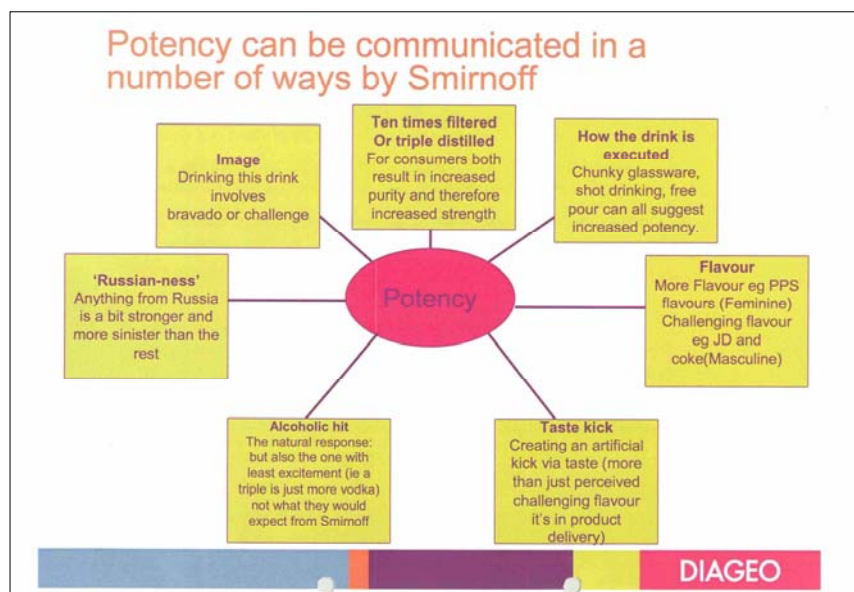
Another presentation expresses this thinking in more graphic terms, depicting the evolution and transformation of comfortable, simple "Pub Man" into "Alpha Male" through the addition of spirits and mixers. The implied "mission" for Alpha Male is to become more energetic, adventurous and sexy – before, presumably, collapsing to the floor<sup>40</sup>:



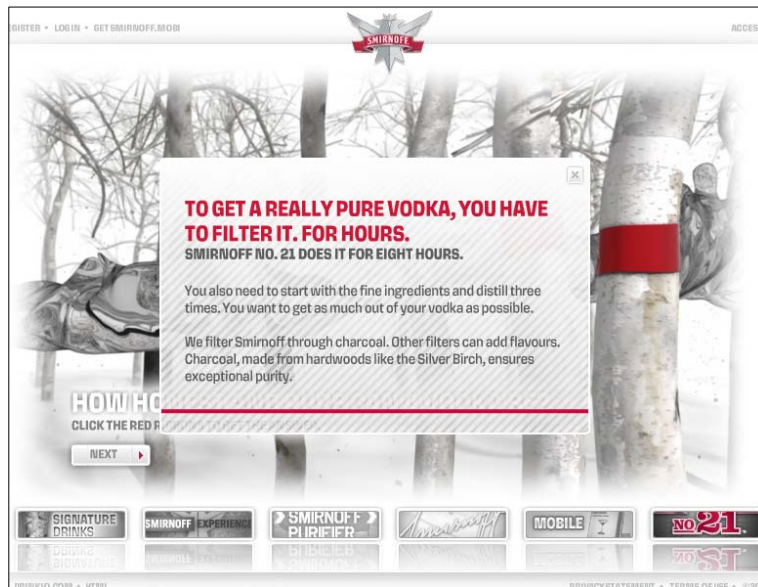


## Potency

As well as forbidding the promotion of excess, the advertising codes state that marketing communications must not suggest that drinks may be preferred because of “*high alcohol content or intoxicating effect*”. However, ‘potency’ was considered a legitimate and persuasive theme for Smirnoff marketing communications. The slide below shows various proposed routes for emphasising the drink’s strength: “Russian-ness”, because “*Anything from Russia is a bit stronger and more sinister than the rest*”; messages about the filtering and distillation process to help convince consumers of “*increased purity and therefore increased strength*”; image-based messages suggesting that drinking Smirnoff “*involves bravado or challenge*”; and even creating an impression of increased potency by serving the drink in “*chunky glassware*”<sup>41</sup>.



Interestingly, the label on a bottle of Smirnoff includes the words “Triple Distilled” in large letters and the website makes a big play on how the filtering and distillation processes contribute to the product’s “*exceptional purity*”<sup>42</sup>:



## Increasing Consumption

Debates about advertising inevitably raise the question about whether effects are limited to brand share or affect consumption in general: is the main effect of alcohol marketing to encourage brand share and switching, or does it also expand the market and increase per capita consumption? The documents suggest that alcohol producers seek to do both with their advertising.

The industry’s interest in young people and recruiting the next generation to alcohol, as discussed in Section 1, speaks to a faith in its capacity to grow the market. This hope is encapsulated in the title of the Smirnoff document ‘*Introducing next generation growth for vodka in the On-Trade*’<sup>43</sup>, discussed above.

In addition, there are references to increasing consumption. For instance, when faced with a falling share of the market and a decline in appeal among younger drinkers, a Lambrini PR Campaign Brief in 2007 pinpointed a need to “*consolidate appeal amongst the younger, lower socio economic females that we have always considered our core audience*”. The brief went on to unpack the strategy: recruiting new young drinkers to the brand, and, crucially, increasing the amount drunk by existing consumers:

- “ • *Our appeal remains most potent amongst this audience [ie. 18-24].*
- *They exist in far greater numbers than we currently attract - They are the lowest hanging fruit.*

*OK – but more specifically isn't it about...??*

- *Announcing the brand to a new set of 18-24 users*
- *Regenerating interest amongst (lower demographic) lapsed users 24+ who may have forgotten about it / moved to something else in the absence of no Advertising. Making Lambrini relevant again. ....AND the relevance is driven by a new contemporary image (positioning) and new flavours.*

*Ultimately we need...*

*Increased penetration – more light users that we can move up the consumption scale rather than being increasingly reliant on a reducing number of very heavy users.”<sup>44</sup>*



### 3. PROMOTING SOCIABILITY AND SOCIAL SUCCESS

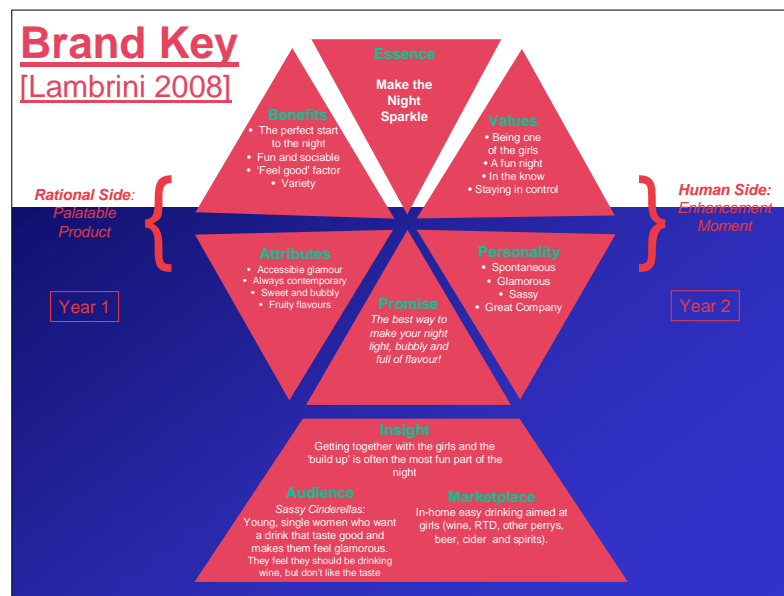
The self-regulatory codes state that alcohol can not be linked to the social acceptance of the social success of individuals, events or occasions. More specifically, advertisements must not imply that drinking can enhance an individual's popularity, confidence, mood, physical performance, personal qualities, attractiveness or sexual success.

#### Sociability

Despite the rules, the idea that alcohol can contribute to the social success of both individuals and social occasions emerge as a clear theme in the documents. For example, Carling is described as a “*social glue*”<sup>45</sup> while Lambrini is described as a “*social lubricant*” in a creative brief for a summer campaign:

*“They’re on a budget when it comes to booze so they want something that tastes good but won’t break the bank. Lambrini is the perfect social lubricant - A light easy to drink affordable (wanna be wine) that gets their nights out in off to a good start. They’ll drink bucket loads of the stuff and still manage to last the duration.”*<sup>46</sup>

It would appear that the positioning of Lambrini as a ‘social lubricant’ is based on the notion that consumers will drink a high volume (bucket loads) of the product, and the appeal of Lambrini is clearly also based on its low cost to consumers. The idea that Lambrini contributes to the success of a social occasion is also evident in the ‘Brand Key’ developed for Lambrini in 2008<sup>47</sup>:



Within the diagram above, Lambrini is positioned as “*The perfect start to the night*” and the “*essence*” of the brand is described as “*Make the night sparkle*”. The brand “*promise*” goes on to describe Lambrini as “*The best way to make your night light, bubbly and full of flavour*”.

The centrality of emotional appeals to consumers is also evident within the documents. These primarily take the form of appealing to the consumer on the basis of social acceptance and belonging to a social group. For example, the idea that “WKD is all about having a laugh with your mates” is described as the “single most important message to communicate to consumers”<sup>48</sup>. The typical WKD target audience is said to include:

*“Young men that want to be seen by mates as ‘up-for-it’, flexible, popular (with mates and girls), ‘sound’ and witty/funny.”*<sup>49</sup>

Further, the desired mindset of the WKD target audience is described as:

*“What do we want our audience to think, feel or do? ...It’s something that me and all of my mates can drink together.”*<sup>50</sup>

Similarly, Carling’s brand promise is described as follows:

*“Carling’s balance of taste and refreshment, and its grounded and sharp-witted British attitude guarantees it will put you on the front foot with your mates.”*<sup>51</sup>

The concept of young men being together in a social group, with their social experiences being enhanced by drinking Carling, is central to Carling’s communication strategy:


*“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.”*<sup>52</sup>

*“Carling celebrates, initiates and promotes the togetherness of the pack, their passions and their pint because Carling understands that things are better together.”*<sup>53</sup>




Indeed they go a step further and aim to “own” this “king of all emotional benefit to young consumers” because “to own sociability is to dominate the beer market”<sup>54</sup>. As a dominant brand it can go even further, owning not just sociability but “all routes to sociability: football, music, and everything else that brings the lads together”, and in this way “position itself as a social glue.”<sup>55</sup>

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## Achieving Dominance



- Dominance is achieved by owning the most important benefit to consumers.
- In alcohol, sociability is the king of all emotional benefits for young consumers. To own sociability is to dominate the beer market.

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## Owning Sociability

- Currently Carling has two very specific routes to sociability, through the brand's association with football and music.
- A dominant brand goes further. Carling can own all routes to sociability: football, music and everything else that brings the lads together.
- In short, Carling can position itself as social glue.





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5

Carling's attempted appropriation of sociability and aim to turn it into a social glue has not gone unchallenged. An ad that clearly built on this strategic thinking triggered formal complaints to the ASA, who rejected the complaint on the grounds that the ad did not associate drinking with the success of a social event (see Section 7: Regulatory failure).

Appealing to consumers' desire to fit in with their peer group and be perceived in a positive light amongst their peer group also resonates with Smirnoff's brand development: *'User wants to be seen as having fun and uses alcohol to help them fit in with the drinking group'*<sup>56</sup>.

## Social Success

The ASA adjudication in favour of Carling mentioned above noted that the ad did not imply the *"transformation of a social event"* by alcohol<sup>57</sup>. However, the documents suggest that other producers are not so circumspect, with suggestions that drinking particular alcohol brands allows consumers to be affiliated with elite groups or enhanced social status. Lambrini, for example, includes *"being one of the girls...in the know"* within its brand values<sup>58</sup>. Emotional appeals to consumers are also considered on the basis of personal transformation and personal release. Smirnoff's Penka brand depicts target males as *"Peacocks [who] want to feel like they are part of the elite"*, and therefore wants to get across the message that<sup>59</sup>:

*"Penka releases my Super Me. Why? Because when I drink it, I feel like I am in the know and part of an elite group."*

*"Do you get any celebs in here? What do they drink?" (Peacock)"*

The transformatory qualities of alcohol are also highlighted by Lambrini, in the following brand promise: *"Lambrini can make you and the girls forget your dull working week and transform you into the glamour pussies you know you should be"*<sup>60</sup>. Lambrini's target audience are described as *"Sassy Cinderellas"*. Considerable efforts are made to identify and understand the target audience of the brand. Hence, Lambrini is positioned as offering

transformation and glamour to consumers who are defined within a consumer profiling exercise as:

*“18 – 24, low class (DE), renting or living with parents, children under 15, Yorkshire bias, working part-time, earning under £10k... Heavy User of... Night Clubs, Crisps, Instant Snack Meals, Soft Drinks.”<sup>61</sup>*

These examples all run contrary to the codes which prohibit the implication that alcohol can enhance an individual’s popularity, confidence, attractiveness or personal qualities. Playing upon the release or transformatory capabilities provided by alcohol also links in with drunkenness. A Lambrini document for instance hints at a need to ‘let go’: *“sometimes girls hold back. They choose not to do the things they would really enjoy. They act sensible and serious because everyone else is being sensible and serious. They hold back when they should be letting go.”<sup>62</sup>* The product is then presented as the means of enabling this relaxation:

*“Life is too short to be serious.”*

*“Lambrini believes that girls should grasp every opportunity to have a bit of fun.”*

*“Lambrini encourages girls to get more fun out of life.”*

*“Lambrini recognises that girls just wanna have fun, and girls should have fun in their own way.”*

*“Unscrewing a bottle of Lambrini marks the beginning of a fun night with the girls, usually on a Thursday or a Friday night.”<sup>63</sup>*

This certainly implies that Lambrini contributes to the social success of an occasion and alters the mood of consumers by helping them to be less serious and “let go”. In addition, the strapline ‘Lambrini Girls Just Wanna Have Fun’, initially used by Halewood International since 1999, suggests that young women identify themselves as a ‘Lambrini Girl’. The implication here is that the consumption of this alcoholic drink is an integral aspect of young women’s social identity.

Despite this encouragement for female consumers of Lambrini to identify themselves as “Lambrini Girls”, it would appear that these consumers are afforded little respect:

*“It’s a wine isn’t it? 4% of Lambrini Girls think Lambrini is a perry which is fine by us. We won’t tell the other 96% if you don’t.”<sup>64</sup>*

It seems that Halewood International is content for “Lambrini Girls” to be confused about the content of Lambrini, and admits as much during a campaign review:

*“We have not made any attempt to communicate that Lambrini is a Perry not Wine as the consumer doesn’t really care.”<sup>65</sup>*

## 4. APPEALING TO MASCULINITY AND FEMININITY

The self-regulatory codes prohibit advertisers from implying that alcohol can enhance attractiveness, masculinity or femininity – nor with daringness, toughness, bravado, challenge, seduction, sexual activity or sexual success.

Despite the codes, alcohol advertisers give considerable attention to targeting consumers on the basis of their gender and appealing to them on the basis of enhanced masculinity or femininity. For example, the need to “*Communicate maleness and personality*” is noted as a key communications objective for the WKD brand.<sup>66</sup>

**Male Targeting**

- WKD continues to be perceived as more feminine than other brands due to:
  - Category
  - Emotional Baggage
- 45% of volume is from Men\*
- Importance of advertising and campaigns to communicate maleness and personality

Source: TGI 2007

Have you got a **W**kie?

There is a drive to understand maleness and masculinity stemming from a concern that WKD is perceived to be a feminine drink by potential consumers. Possible actions for research identified by TNS Consumer Research in a WKD Ad & Brand Update for Beverage Brands include “... to understand what masculine means in the context of WKD v lager and redesign the imagery statements in the tracker so we can understand this better”<sup>67</sup>. This clearly runs contrary to the spirit of the codes’ proscription of any reference to masculinity.

A concern with understanding masculinity is also apparent for other alcohol brands. Diageo, for example, highlights the brand values and personality of Smirnoff Black as “*urbane*”, “*masculine*” and “*charismatic*” in a document representing its “*Brand Values & Personality*”<sup>68</sup>. This includes dictionary definitions of these characteristics illustrated with photographs of George Clooney, Bono and Ewan McGregor:

## Smirnoff Black: Brand Values & Personality

**[THE DISTINCTIVELY SMOOTH MANIFESTO]**

- I believe in leading by example —
- I believe that true class comes from who you are —
- I believe everyone deserves the taste of the good life —
- I believe I feel more confident when I'm wearing pinstripes —
- I believe being a better man means more than just dressing well —
- I believe a true gentleman masters style and substance —
- I believe that personal refinement takes discipline —
- I believe in the simple pleasure of knowing more —
- I believe in upholding high standards in work and my personal life —
- I believe a gentleman is one who thinks of other people first —
- I believe men should be confident enough not to broadcast their every passing whim —
- I believe a true gentleman should always be able to laugh at himself —
- I act while other men talk, I run when other men just walk, I look at this world and want it all —

**Smirnoff Black: Personality**

**ur - bane, adjective:**  
Polished and smooth in manner, polite, refined, and elegant.

Men, at the end of the day, will have to rely on their intellect and their passion, their education and professional careers, to be acknowledged and elevated in contemporary society.

---

**mas - cu - line, adjective:**  
Suggestive or characteristic of a man.

Masculinity is measured by success, power, and the admiration of others. It involves confidence, toughness, and self-reliance. A man should make a name for himself and stand for whatever it is that makes an adult of things and makes him worthy to take care of "girls" or even other men's wives. Suggestive otherwise. And finally, an ability to exude a host of femininity is profitable.

---

**char - is - mat - ic, adjective:**  
Possessing an extraordinary ability to attract, a magnetic personality.

A certain quality of an individual's personality, which he is set apart from ordinary men and possesses in a natural quality. The word originates with Hippocrates and has to do with "Charisma" (Smirnoff) quality to eat. That's because, in fact, the opposite is true. Charisma is more often than not.

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**self - dep - re - cating, adjective:**  
Underrated; Someone who does not take themselves too seriously; modest.

Many a candidate use self-deprecating humor to avoid seeming arrogant or pompous, and to help the audience identify with them. Both appear obvious and useful in a job interview to control what you say in the interview.



Meanwhile, one of Carling's agencies goes as far as to develop a set of "Carling Commandments" for its male consumers<sup>69</sup>. These commandments draw upon stereotypical notions of masculinity such as respect and loyalty to male friends over and above women ("Thou shalt never abandon your mates in favour of a girl"). References are also made to which women it is appropriate to target sexually, and behaviours which are stereotypically associated with femininity are mocked ("Thou shalt never been [sic] seen at a 'musical'"). Within these commandments, drunkenness is alluded to ("thou shalt never desert thy mates in drunken distress"), and, despite the CAP codes clearly stating that "references to, or suggestions of, buying repeat rounds of drinks are not acceptable", these commandments state that "thou shalt never miss a round".

### Carling Commandments

HILL KNOWLTON

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- Thou shalt never abandon your mates in favour of a girl
- Thou shalt never leave a game early
- Thou shalt never miss a round
- Thou shalt never allow your mates to get away with crimes against fashion
- Thou shalt never offer warm beer to mates
- Thou shalt never covet thy mate's sister or mum
- Thou shalt never switch allegiances
- Thou shalt never desert thy mates in drunken distress
- Thou shalt never eat food you can't spell
- Thou shalt never forget thy roots
- Thou shalt never purchase CDs such as *Love Songs for Love Song Lovers*
- Thou shalt never been seen at a 'musical'
- Thou shalt never hold a lighter aloft at a concert
- Thou shalt always welcome a mate's mate

8



The value of appealing to masculinity is also recognised by the Smirnoff brand:

*“Guys are inherently lazy! ... Guys want easy slices of masculinity ... Guys want badges of masculinity that can be worn without the effort of earning them.”<sup>70</sup>*

Concerning associations are drawn between masculinity and maleness and the strength of alcoholic drinks. Section 2 noted Smirnoff’s interest in “potency” and “Russian-ness”, constructs that are also linked in to maleness and masculinity:

*“Russian cider brings you a way to keep up with the drinking rhythm of your friends while enjoying a drink which can make you look as much of a man. ... Potency is a key area to delivering masculinity.”<sup>71</sup>*

Meanwhile, the advertising agency Cheethambell JWT suggests that a ‘macho’ ethos can be presented by the Sidekick brand *“Kick starting the night... macho competitiveness; game playing – how much can **you** take?”<sup>72</sup>* In a similar vein, Carling’s sponsorship of the ‘CL24’, a 24-hour music event spread across different venues in a city, sets out to *“Challenge the ‘lads in the pack’ to participate in the whole 24 Hours”<sup>73</sup>*. Notions of bravado and daring are equated with masculinity and alcohol consumption.

Where alcohol advertisers seek to target the female market, sexual stereotypes are again drawn upon. The concept of sexual attractiveness is a central theme here. The following ideas were circulated by Brazen PR for the Lambrini brand concerning a promotional partnership with Pretty Polly:

- *“Guide to get the perfect pins, including Lambrini girls sending in their own suggestions.*
- *Survey of the best celebrity legs – send in your suggestions or do vote online.*
- *Guess whose legs, pictures of celebrity legs only and you can guess who is who – competition to win cases of Lambrini in a draw if you get them all right*
- *Team up with PP to include a review on the best tights for you, tights to wear for xmas parties etc*
- *Lambrini Sexy Legs Search– if you can’t get to the Clothes Show send pictures to the website and be in with a chance of winning a separate prize, eg. more Sugababes tickets etc.<sup>74</sup>*

These ideas culminated in a promotional campaign in 2006 by Pretty Polly and Lambrini, which included a “UK’s Sexiest Legs Search [in image below]”<sup>75</sup>:



**Lambrini** **Lambrini** *girls just wanna sparkle!*

Home **UK's Sexiest Legs Search** Girls Guides Celeb Pins Contact us Links

**Have you got the Perfect Pins?**

The largest fashion event in the world is set to take you by storm at the NEC in Birmingham from the 1-6 December 2006 and Lambrini will be there!

We're launching the first ever Search for the UK's Sexiest Legs and we'd love all you Lambrini girls to come along and take part!

Contestants will have to show off their perfect pins and answer questions from a panel of judges. The overall winner from daily contests will be chosen by our fashion expert and **PP**'s Head of Design

Fashion shows will take place at every day at the following times:-  
Friday Dec 1 – 11am, 1pm and 3pm  
Saturday Dec 2 until Wednesday Dec 6 - 10am, 12pm, 2pm and 4pm

Should you win, not only will you win the crown of the UK's Sexiest legs but you will participate at **PP**'s Spring Collection photoshoot and take home your very own model portfolio!

If you can't make it to Clothes Show Live, do not fear, you still have a chance of entering. Simply **send us some pictures** of your pins looking Pretty Perfect and you could be in with a chance of winning a host of Lambrini girl goodies including shopping vouchers, concert tickets, Pretty Polly Sparkle Fishnets and of course bottles of Lambrini for you to share with your friends.

So pop along to see us on Stand PU98 and strut your stuff!

In addition to connecting alcohol brands with female sexual attractiveness, female sexuality is used to promote products. This is apparent in Smirnoff's development of a job description for “Penka Girls” used to promote the Penka brand. The brief explains “*how to represent the brand effectively*”, the core values of the Penka Girls combine Michelle Pfeiffer, Cameron Diaz and Uma Thurman “*into every bar boy's dream*”:

*“Charlie's Angels #2...cool, ruthless, saucy, fun-loving, and gorgeous. They are exotic, but they have a hardcore of serious industry and category knowledge and skill...They bounce into the bar and take control like a team of hit-chicks. (a combination of Michelle Pfeiffer flick-flacking up as Catwoman, with Cameron Diaz dancing and looking delightedly at her butt doing its own thing, and with Uma Thurman slicing skulls as The Bride). More outlaw and fun than sophisticated...They should be devil-may-care, but not catwalk: every bar boy's dream...A mixture of outrageousness, sauce, fun and skill. Maverick but loyal.”*<sup>76</sup>

These brand values and messages are developed despite the CAP codes explicitly stating that, “Marketing communications must neither link alcohol with seduction, sexual activity or sexual success nor imply that alcohol can enhance attractiveness, masculinity or femininity”.



## 5. SPONSORSHIP

**The self regulatory codes do not specifically deal with sponsorship – a major omission given its importance as a promotional tool. However there are strong injunctions against any link to youth culture or sporting achievements; using models who are or look under 25 years; appealing to those under 18 years.**

Sponsorship of events is becoming an increasingly important part of contemporary marketing, alongside more traditional channels such as advertising. For companies, there are many benefits. At a basic level, sponsorship raises awareness of the brand, especially when it is associated with a major sporting or cultural occasion. More subtly, the expectation is that the favourable emotions and images which consumers have of the event itself transfer to the sponsoring brand, creating an unthinking association in consumers' minds between the event and the brand, positive attitudes, and emotional connections. Because of the social setting and enjoyable shared experience, consumers are assumed to be more involved and more receptive than they might be to more overt forms of marketing.

*“Football and beer are perfect partners. Football’s not the same without beer and beer’s not the same without football. Together let’s change the word ‘beer’ in the above sentence to Carling”<sup>77</sup>*

*“More people are attending live music than ever before. FACT. Which is great for Carling as beer and live music go hand in hand. FACT”<sup>78</sup>*

The same thinking applies to tie-ups with celebrities, another form of sponsorship: by associating itself with an already engaging celebrity, the brand gains power and credibility.

Many of the brands we examined are, or have been, involved in sponsorship. Carling sponsors both music (weekend festivals and gig venues) and football (the Carling Cup, with its associated website<sup>79</sup> and merchandise).

The screenshot shows the Carling Cup website interface. At the top, there is a navigation bar with links for HOME, BEER, BEER FINDER, MUSIC, FESTIVALS, FOOTBALL, CARLING CUP, CARLING CUP PREDICTOR, THE OLD FIRM, ONE-ALL, THE ESSENTIAL, LEAGUES, BIG DEBATE, MUST READ, COMPETITIONS, ENTERTAINMENT, MEMBERS, CONTACT US, and SHOP. The main content area features a 'LATEST NEWS' section with a photo of Simon Grayson and several news items. A 'Carling Cup Predictor' section is also visible, along with a 'Spot The Ball - Win Beer!' promotion. On the right side, there is a search bar, a login section, and a 'CARLING POLL' section.

Smirnoff Red vodka sponsors monthly editorials in FHM magazine and ‘Electric Cabaret’ (themed events in nightclubs). WKD sponsors the Nuts magazine Football Awards. Lambrini sponsors the ITV2 television programme ‘Coleen’s Real Women’, a programme in which ‘real women’ compete to feature in advertising campaigns for companies such as Pretty Polly and Schwarzkopf.

Carling’s primary target group is young male drinkers – ‘lads in the pack’. When looking for sponsorship opportunities, Carling executives seek events which are reflective of this group’s culture and interests, such as football, music festivals and gigs. In the words of one Carling executive:

*“They [young men] think about 4 things, we brew 1 and sponsor 2 of them”*<sup>80</sup>

## **Building Brand Awareness and Recruiting the Young**

Sponsorship can fulfil a range of different functions. The documents show that producers and agencies regard sponsorship as a powerful strategy for building brand awareness and attracting new recruits to the product. Carling defines the purpose of its music sponsorship as to:

*“Build the image of the brand and recruit young male drinkers”*<sup>81</sup>

As Section 1 shows, music festivals are selected for Carling sponsorship partly on the basis of their being popular choices for “*festival virgins*” – youthful first-time attenders. Similarly, football provides powerful opportunities for Carling to “*recruit young male (LDA<sup>2</sup>-21) drinkers into the brand*”, as this strategy for Carling’s 2005 Cup Final sponsorship outlines<sup>82</sup>. The aim is to “*give LDA-21 males a reason to believe in the product whilst building an emotional connection to the ‘Vivid me’ state*”, “*create emotional experiences for young male drinkers*” and “*maintain a level of awareness that allows us to leverage key tournaments*”. The sponsorship strategy seeks to ensure that the emotions, enthusiasm and drama experienced by cup final spectators transfer to the brand itself, creating a connection in their minds between the two which will translate ultimately into market share.

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<sup>2</sup> Legal Drinking Age

BRIEF FOR CARLING CUP FINAL - 2005	
Brand	Carling
Coors Contact	Richard Smith
Agency Contact	
<p><b>Carling Brand Strategy</b> Recruit young male (18A-21) drinkers into the brand, giving them real reasons to believe in our product superiority and through our distinctive British attitude.</p> <p><b>Carling Brand Promise</b> Carling's balance of taste &amp; refreshment and its grounded &amp; sharp witted British attitude guarantees it will put you on the front foot with your mates.</p> <p><b>Carling Advertising Strategy</b> Give 18A-21 males a reason to believe in the product whilst building an emotional connection to the "Vivid me" state, to cut through in what is seen as an undifferentiated market</p> <p><b>Carling Sponsorship Strategy</b> Create emotional experiences for young male drinkers &amp; amplify the uniqueness of these experiences in a grounded &amp; sharp witted way.</p>	
<p><i>Carling and Football:</i></p> <p><b>What we need to achieve in Football:</b></p> <p>Maintain a level of awareness that allows us to leverage key tournaments. Providing the things that real fans really want Our history, our actions, we're a real fan, like you</p> <p><b>Headline Activity:</b> Carling Cup, Old Firm, FAW, Club Deals</p>	

Similarly, WKD chose to sponsor the Nuts magazine 'football awards' because the magazine provided access to a high proportion on young men in the WKD target group. As a representative of WKD's PR agency explained when giving evidence to the HSC: "*WKD are partnered with Nuts; Nuts has an average age range of 24 years in terms of readership. 92% are over 18 in terms of the readership again, so it is absolutely targeted to our target audience. It is very football focused in terms of content. Football in terms of an aside, in terms of the award itself, about 35% is the current figure of 18 to 25 year olds play regularly and 54% watch sport in a social environment, so maybe with their friends at home or in a pub, for example. So it is an appropriate link for us as a brand*"<sup>83</sup>.

For Smirnoff, its media partnership with FHM magazine involves running monthly editorials and promotions themed on 'Original Nights Out'. Through ongoing Diageo market research, FHM readers can be followed up to assess whether there is any heightened awareness of other Smirnoff-sponsored events "*and whether this has generated impact at the brand level*"<sup>84</sup>. The same analysis goes on to note that, although overall penetration of the FHM readership is quite low, "*the profile suggests it's an ideal way of reaching a younger consumer*".

## Establishing Credibility

Sometimes the aim of sponsorship is less about simply building brand awareness and more about developing a longer-term and more meaningful relationship with consumers. Documents refer to the need to build credibility and "emotional connections" with consumers. In contexts such as music and sport, where having a real knowledge and being a 'true fan' are critically important, brands need to demonstrate that they have a genuine 'right' to be associated with the event in question.

Carling, for example, speaks about "*earning the right to 'play' in key tournament years*"<sup>85</sup> as a football sponsor in its football sponsorship strategy. This 'right' to be associated with the event is even more important in music, where, because it is not one of the leading sponsoring

brands, Carling recognises it needs to work hard to demonstrate to consumers that it has a genuine interest and legitimate presence. This may mean moving away from obvious forms of sponsorship – covering a music venue with Carling logos – to more subtle and involving messages and activities.

*“[we need to] ensure that Carling do not simply ‘badge’ the venues and install ‘Venue Logos’ for no reason other than to brand. This would create logo blindness and not generate any emotional connections with the consumer.”*

*“[we need to] demonstrate Carling’s grounded sense of humour and that they ‘get’ music.”<sup>86</sup>*

The Carling music strategy seeks to build a credible image of Carling as a brand which understands music and is a friend to the music fan. The aim is that the emotional connections which gig- and festival-goers experience with each other and with the performers transfer to the brand. This is spelled out as justification for a proposal for Carling-branded set lists which would be distributed after each performance to those who had subscribed in advance to the service:

*“Ultimately, the band are the heroes at the venue and Carling should use them to ‘piggy back’ and engage customers [sic] emotions.”<sup>87</sup>*

Exclusive sponsorship arrangements allow producers to use the full marketing mix of product, place, price and promotion to reach and connect with consumers. An example of this was the ‘Carling Weekend’, the official name for the two simultaneous weekend-long annual music festivals in Reading and Leeds, which have been running for decades, whilst associated with Carling from 1999 to 2007. Proposed channels for engaging with festival-goers included:

- ***The Carling Sculpture*** *“A unique point of interest on site that is created to engage the consumer... a slowly melting block of ice (to re-inforce Extra cold strategy) or cans of Carling embedded in something such as a rock”*
- ***Carling Safety Can*** *“False cans that unscrew and allow punter to store valuables in”*
- ***Free Tents*** *“Very likely to be adopted by Festival virgins who are most likely not to own tents ... Quick opportunity to get major brand presence on site”*
- ***The Campsite Morning Delivery Service*** *“Each morning staff deliver a cold can Carling and the daily newspaper – Great way to start the day!”<sup>88</sup>*

Another Carling-sponsored music event was Carling Live 24, an annual 24-hour music event spread across several venues in a city, which ran between 2004 and 2006. Consumers were encouraged to go from venue to venue: “Challenge the ‘lads in the pack’ to participate in the whole 24 hours”. Again, the full marketing mix was deployed to ensure participants were exposed to Carling in as many inventive ways as possible throughout the event:

*“Each season ticket [giving access to the majority of the Live 24 gigs] comes with a free Carling”*

*“Free t-shirts to be given out at the first and last gig ... ‘I was there at the start!’ printed on the front ... ‘I did the full 24 hours!’ given to the people who have the first t-shirt”*

*“500 Survival Packs to be distributed to lads from the Lads Lounge area ... to include: fun cameras wrap around thermal blanket, dog tag -‘if lost please return me to...’, comfort kit ... Communicates the challenge to complete 24 hours”*

*“Sweaty t-shirts and socks can be handed in and exchanged for clean branded equivalents in the Lads Lounge. Carling will then post your clean t-shirt and/or socks back to you ... Carling are giving that little bit extra to ensure you have a good time. A quirky and unexpected idea. Scores Carling another brownie point. A talking point amongst guests and media”*

*“Hired promo girls ‘kidnap’ gangs of lads at one event and get them to the next one ... A branded hummer will be waiting outside venues ... Connects with our lads in pack target market”<sup>89</sup>*

## **Welcome - and Well Used - Loopholes**

As we note above, the self-regulatory codes do not address sponsorship directly. Examining the documents, it is clear that themes which are outlawed in broadcast advertising and other promotions, such as that campaigns should not be associated with sporting success or suggest that alcohol can enhance the social success of an individual or event, occur frequently in sponsorship campaigns:

*“Carling celebrates and accentuates the camaraderie of football fans by celebrating the glorious highs and lows of being a fan”<sup>90</sup>*

The ambiguous status of sponsorship in terms of the codes is illustrated in an exchange from the Health Select Committee oral evidence, at which a representative of the PR company for WKD is asked to elaborate on WKD’s sponsorship of the Nuts magazine football awards. The executive explains that the awards are “irreverent, if you like, sporting awards - so best take out, a bravery award for the player who has managed to play on despite injury, the best bargain of the season, etcetera. The awards themselves are voted on by members of the public, again working through the *Nuts* magazine content, if you like; and our job from a PR point of view is to promote the winners”<sup>91</sup>. When asked by the Committee whether the codes on not associating alcohol with sport are being transgressed by the linkage, the PR executive explains that the sponsorship is not focused on the brand WKD and is not about sporting success or masculinity per se, and is therefore acceptable:

**“Charlotte Atkins:** I thought that there was some sort of ASA code which actually talked about not linking up with sport, sex and so on. Would that linkage not transgress those codes?

**Ms Fuke:** The initiative we are talking about is a sponsorship and the sponsorship is not focused on the brand itself but it is sponsorship of football awards and Nuts football awards are about sponsoring or encouraging people to engage with football and we simply support that and this sponsorship initiative is managed through equally important guidelines, so a marketing activity would be related to that in terms of content, style and tone.

**Charlotte Atkins:** But you are aware that there is a code which suggests – in fact forbids the association of alcohol with sporting success and with masculinity and sex.

**Ms Fuke:** This is not about sporting success and masculinity; this is awards which are irreverent that the fans make to the people who have played all through an injury or the best chant on the terraces.

**Charlotte Atkins:** So basically it is a way of linking up with football without transgressing the code?

**Ms Fuke:** I am sorry?

**Charlotte Atkins:** It is a way of linking up men’s obsession with football without transgressing the code?

**Ms Fuke:** I do not believe it conflicts with the code, no.”<sup>92</sup>

The apparent loopholes concerning sponsorship are particularly vividly illustrated by Lambrini’s sponsorship of the second series of ‘Coleen’s Real Women’. The show features Coleen Rooney (married to footballer Wayne Rooney) searching for “everyday women to feature as the faces of major brands”<sup>93</sup>. The second series began on ITV2 on 10<sup>th</sup> February 2009. The value of the association for Lambrini is obvious: Coleen is “the nation’s favourite WAG and girl next door”<sup>94</sup>, and the show had already had a successful first series involving ‘real women’ being recruited as the face of brands such as Ultimo, Pretty Polly, Fake Bake and Schwarzkopf.

For Halewood International, the tie-up was a major development in its strategy for Lambrini. It represented its first broadcast sponsorship for five years, and provided huge opportunities for brand exposure, as explained by BJL, Lambrini’s lead creative agency:

*“Lambrini will be the sponsor of the entire second series of Wayne Rooney’s better half’s show, with the brand appearing on idents ... and exploiting the relationship through online and mobile sponsorship, alongside point of sale, promotional and consumer PR activity.*

*Halewood International’s marketing controller Richard Clark said of the decision to sponsor the show: ‘This programme has an excellent fit with our core 25-45 female target audience and aligning ourselves with a high profile sponsorship such as this reinforces our commitment to the Lambrini brand.*

*‘The agreement to sponsor the series comes on the back of a significant burst of national TV support for the brand pre-Christmas and we will be looking to underpin our £5m marketing plan including additional TV advertising later this year.’*

*BJL’s creative director Billy Mawhinney added that the creative is ‘a bit of fun for everyday women, which is what they expect from the programme and from their favourite tipple.’”<sup>95</sup>*

The extract above is careful to describe the core target audience for both brand and show as 25-45 year old women. However, Coleen Rooney herself was 23 at the time of the proposal, which was in direct contravention of the rules stating that marketing promotions must not use models who look or are under 25.

This problem was flagged up within Lambrini on the 16<sup>th</sup> December 2008, in an email from the CAP<sup>3</sup> Copy Advice Team to BJL, Lambrini's main creative agency. The adviser email (reproduced below) essentially says that were this a conventional campaign Coleen Rooney's presence would preclude its use, but as it's a combination of TV sponsorship and PR it has no jurisdiction - a suggestion is then made to consult the Portman Group.

*“The kinds of activity that you mention usually fall outside of the remit of the British Code of Advertising, Sales Promotion and Direct Marketing (the CAP Code), although some in-store ads can be covered (depending usually on contractual arrangements for display or if a sales promotion is involved). PR is not covered, but if marketing material is distributed as part of a guerrilla campaign, for example, then the Code would apply.*

*I will have to advise, though, that you are very likely to breach the Code by featuring Coleen in any communication that does fall under it because of her age. The Code states:*

***People shown drinking or playing a significant role should neither be nor look under 25 and should not be shown behaving in an adolescent or juvenile way. Younger people may be shown in marketing communications, for example in the context of family celebrations, but should be obviously not drinking.***

*We would therefore advise against using her in any advertising, direct marketing or sales promotional material. We would also alert you to the presence of an almost identical clause in the TV Advertising standards rules (clause 11.8.2(a)).*

*We are also concerned that she may be someone who appeals strongly to under 18s (a breach of clause 56.7 of the CAP Code). In terms of material that falls outside of the remit of any advertising standards Codes, you should consult the Portman Group, whose industry Code I believe this approach may also contravene.*

*I realise that this advice will be disappointing, but I hope nevertheless it is helpful.* „<sup>96</sup> [Emphasis in original]

The result is confusion about the way forward, and a touch of opportunism on the part of the advertiser. Despite this explicit advice from CAP that the use of Coleen Rooney would breach conventional advertising codes, the decision is made to continue the push - as this email the following day, from BJL to Lambrini's PR company MediaNorth, illustrates. In

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<sup>3</sup> Committee of Advertising Practice – an advertising industry Committee with responsibility for the UK advertising codes.

response to the question “*Are CAP saying we should not be permitted to sponsor the show?*”, the email explains:

*“No, not overtly. It’s a little confusing regarding which body enforces the code in different environments – the CAP copy advise team, the BACC, ASA, Portman Group etc all have an interest in upholding the code in different situations. It seems unclear which if any one of their jurisdiction broadcast sponsorship falls, so I guess I was just flagging that we need to make sure its hasn’t fallen between groups with no one taking responsibility. Hence I thought it was just worth tacking [sic] head on with ITV to ensure they have understood the full implications of the code, not just the audience age composition?”<sup>97</sup>*

Instead of going to the Portman Group as advised, Lambrini go straight to ITV – who, of course, have a clear vested interested in responding positively. By the following day, the 18<sup>th</sup> December, an email from Lambrini’s PR company suggests that ITV was content for the sponsorship to proceed, providing certain checks were in place (such as not using Coleen “*to promote Lambrini in an explicit broadcast sense via airtime ads*” and “*removing Lambrini from the Saturday afternoon transmission*”):

*“Dear all, following on from Sue’s email I have double checked with ITV that they have fully understand the implications of the code. ITV’s response went along the lines that they are very confident from a sponsorship association perspective. All the relevant checks with ITV’s regulatory team and also compliance team have been carried out - you have already seen the email response from ITV compliance. ITV have reiterated what we already know in that we would not be able to use Coleen to promote Lambrini in an explicit broadcast sense via airtime ads as she is not yet 25.*

*As I mentioned in the conference call, ITV will be removing all Lambrini association from the Saturday afternoon transmission which will illustrate to Portman and Ofcom ITV’s responsible behaviour should the sponsorship attract any complaints.*

*I hope this helps, cheers ”<sup>98</sup>*



In February 2009, Lambrini went on to sponsor the whole of the second series of Coleen's Real Women<sup>99</sup>:



## 6. NEW MEDIA

**The self regulatory codes do cover new media, so all the rules discussed so far apply. In reality the burgeoning nature and form of digital communications creates many problems.**

Reviewing the internal advertising and marketing documents of alcohol companies from 2005 through to 2008, it is apparent that the use of new media to market alcoholic drinks is a growing trend. New media is a collective term which refers to digital communication channels such as the internet, e-mails, mobile devices and electronic games. The use of new media for marketing activities is regulated by the British Code of Advertising, Sales Promotion and Direct Marketing. This code is enforced by the ASA and covers the following forms of new media:

- Ads in paid-for space (banner ads, pop-ups etc)
- Advertising content in commercial e-mails
- Sales promotions wherever they appear online
- Commercial text messages
- Viral marketing e-mails
- Paid-for entries in search engine results
- Ads on electronic kiosks and billboards
- Ads in electronic games
- Use of e-mail addresses for marketing purposes (eg. spam)

The rapidly evolving nature of new media presents particular regulatory challenges, and the editorial content of alcohol company websites, personal e-mails and items posted on bulletin boards by consumers is currently beyond the remit of the ASA. Within the context of alcohol advertising, these regulatory challenges are a matter of concern given the growth, scale and potential youth appeal of new media.

During the oral evidence taken before the Health Select Committee on Alcohol on the 9<sup>th</sup> of July 2009, representatives from digital communications agencies were questioned about the use of new media in the context of alcohol advertising. The following exchange between the chairman of the committee and Mr Gill of Five by Five (digital communications agency for WKD), highlights the growing usage and scale of new media for advertising purposes:

**“Chairman:** ...Could you please explain to us what is meant by “new media” and how do you use this to advertise alcoholic drinks?

**Mr Gill:** New media is basically digital communications. Digital has been around since circa 1991 but has really escalated in the last ten years in terms of an advertising medium. To give a sense of scale in terms of the amount of money that is spent in the advertising industry, in 2008, which are the latest figures released by IAB, the amount spent on advertising was 3.3 billion, which was up 17% year-on-year versus 2007. On an advertising aspect it is down to search, display advertising, classified and email. Again, to give that a sense of scale, the total advertising for the UK last year was 17.5 billion. Digital represents 19.2% of that with only TV slightly ahead of it on 21.9%. It is predicted that digital will actually outspend TV, if not in the next 12 months, certainly in the next 24. It has overtaken other traditional media channels such as radio and the press, already, just to give you a sense of scale of what it is.”<sup>100</sup>

The evidence given here by Mr Gill about the growing use of new media concurs with planning documents for WKD, which state that “TV is no longer the dominant media with the WKD core audience”<sup>101</sup>. Within internal briefing documents, the target audience for WKD is identified as 18-25 year olds<sup>102</sup>, for whom new media such as the internet, computer games and mobile phones are considered to be particularly appealing compared with the more traditional print, press and radio media. Within the context of a competitive youth market, the value of digital marketing for the Smirnoff brand is described as follows:

*“Is Smirnoff an exciting brand for young males?...To keep pushing further a continual exciting presence is required. Experiential events such as Original nights or more effective use of Digital may help here... In a wider context Smirnoff appears to be doing well. This is encouraging given the increased targeting by many categories for a younger audience. Efforts must now be made to push Smirnoff as even more exiting to maintain momentum with a demanding consumer group.”*<sup>103</sup>

Perhaps unsurprisingly, alcohol companies such as Smirnoff now channel significant resources into developing digital marketing strategies. In 2008 Splendid Communications completed a series of six online reputation reports for the Smirnoff brand, tracking the unofficial and official branded presence of Smirnoff on Flickr, YouTube, Facebook and the blogging community. Within these reports, concern is expressed about user-generated content adopting the Smirnoff logo and brand, which could lead to “*negative brand associations*”<sup>104</sup>. On Facebook, for example, it was estimated that 72% of individuals who were members of Smirnoff-related groups belonged to groups where there was a significant risk of breaching the Diageo Marketing Code (DMC) (eg. by depicting irresponsible drinking). These groups contained references such as “*I did 21 shots in one night and lived to tell the tale*”, and reports of “*getting totally smashed’ from people at Secondary School*”<sup>105</sup>.

At the same time, however, Smirnoff continues to do all it can to boost its presence on the site and the opportunities offered by digital marketing strategies are highlighted. Referring specifically to the blogging community, blogs from the USA and elsewhere in the world are described as representing a “*huge opportunity to reach, educate and cultivate the UK blog community covering Smirnoff*”<sup>106</sup>. Meanwhile, the growth in members of Smirnoff-related Facebook groups is highlighted, and the amount of Flickr activity is also described as “*impressive*”<sup>107</sup>.

For the Lambrini brand, the internet is identified as one of the top media routes to the target audience<sup>108</sup>:



The slide highlights not only the growth and youth appeal of the internet but also the ‘creative freedom’ it affords compared to traditional forms of media. This is particularly salient in a context of increasingly stringent restrictions on more conventional means of advertising alcohol.

The interactive and viral nature of new media is particularly valuable. During the oral evidence session outlined above, Mr Constantinou, Managing Director of digital communications agency AKQA, describes the value of new media as follows:

“**Mr Constantinou:** Beyond the facts and figures that Nick [Gill] has talked to, which are absolutely accurate in terms of the amount of spend we are seeing in the new media market, we utilise new media marketing for our clients to help engage and interact with consumers on behalf of our clients. It is an opportunity to have a two-way conversation with our clients’ consumers.”<sup>109</sup>

In other words, what makes new media of such interest to producers is its ability to engage consumers in a two-way conversation with alcohol marketing. Viral marketing is particularly powerful in terms of its capacity to exploit the existing social networks of consumers, relying upon consumers to pass on messages about the brand to their social peers. Mr Constantinou goes on to describe the values of viral marketing in the following way:

“**Mr Constantinou:** Yes, viral marketing, again, has been at the forefront of new media as it has grown over the last few years. It is an opportunity for us to engage with our clients' consumers... we do look for slightly humorous, engaging, compelling content that we can supply to our clients' consumers to spread the word of mouth around the good brand values of our clients, whether it be Diageo or any other alcohol brand. So it is, in effect, a piece of content that can be passed on from friend to friend and it can multiply the brand values and the knowledge of the brand amongst the target audience.”<sup>110</sup>

This account of viral marketing is echoed by Mr Gill of Five by Five:

**“Mr Gill:** I would absolutely support exactly what Nick [Constantinou] said in terms of how viral marketing is used. It can add extra brand value to your brand. If you create content that is compelling enough that people want to engage with and want to send on to their peer group - some recent examples, like the Cadbury's gorilla example that has been highlighted of late, where that content from a viral perspective was released online first before it was even aired on TV - it creates huge credibility and talkability for the brand.”<sup>111</sup>

Internal documents for the Smirnoff brand outline the way in which ‘viral’ strategies are intended to operate in practice through the process of ‘seeding’:

*“Seeding the Viral...The purpose of seeding is to place the creative [See TV advert] within sites, message boards and communities frequented by the heaviest online users...seeding provides a very credible relationship with a potentially enormous audience through a 1-2-1 relationship to achieve 1-2-many... Viral sites, creative communities and lads’ websites will be targeted.”*<sup>112</sup>

In the evaluation of another digital campaign for Smirnoff, called ‘Electric Cabaret’, the success of seeding the campaign on social networking sites such as Facebook is highlighted (it should be noted that the minimum age for users of Facebook is 13 years):

*“Smirnoff Electric Cabaret: Digital...*

- *Used Smirnoff Original Nights Page to promote Cabaret, growing community to over 160 fans*
- *Seeded over 30 student and nightlife groups on Facebook with a total reach of over 25,000 users and a Facebook OTS of over 301,113*
- *Used Facebook as a competition medium to increase buzz – giving away 10 pairs of tickets”*<sup>113</sup>

Similarly, when the ‘jumpstyle’ dance was created for the Lambrini brand (see Section 1), the Brazen PR company suggested “we can film some guerrilla type dancing with girls we know and girls in the office and seed this on MySpace, Facebook etc.”<sup>114</sup> Once a message has been ‘seeded’ by alcohol companies, it is anticipated that consumers will then pass it on through their social networks. These messages are typically intended to be viewed as credible and ‘cool’ by young people, as highlighted by the following extract from a Carling brief:

*“Primary target audience: We want to appeal to early adopting ‘Young & 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. These aren’t the ‘techie’ of the world, they are your mates who are telling you about the new stuff first, sending cool links via YouTube etc...”*<sup>115</sup>

There is also an intentional blurring of the distinction between corporate emails and emails sent between friends, as highlighted by this Carling brief for the *Play on the Park Get Your Kit On 2006-2007* promotional prize draw:

*“1. e:mail [sic] to the person who has expressed an interest in entering by texting in their unique code and e:mail address. This is our key entrant. E:mail should encourage them to sign up, enter the promotion and recommend 2 mates.*

*2. e:mail to the 2 mates that the above person recommends to join them in the competition. This should mention the mate who recommended them and encourage entry into the promotion (sign up). It should look like it’s come from your mate, but is infact [sic] Carling branded. Tone need to be ‘lads in the pack’ kind of speak!?”<sup>116</sup>*

In addition to encouraging consumers to spread brand messages to their friends, it is proposed that Carling branded emails should give the impression that they have originated from a friend. Clearly, new media has considerable appeal in terms of its potential to reach large numbers of a target audience, and lend credibility to messages targeted at young people. It is perhaps unsurprising, therefore, that BMB, an advertising agency whose clients include Carling and Diageo, goes so far as to describe digital marketing as “routes to magic”.<sup>117</sup>

However, new media is not simply being used as a replacement for traditional forms of media but in addition to them, to enhance and intensify the impact. Mr Constantinou of AKQA, for example, describes the thinking behind a brief from Smirnoff to seed the Smirnoff Sea television commercial:

**“Mr Constantinou:** In this instance, the purpose of the brief that we received from Diageo was to amplify and extend what was a lot of money spent on quite an expensive TV campaign and to extend that campaign into the new media environment... We executed that, as you see from the sheet I have got in front of me, with a casual online game for that target audience. To explain why we created this digital asset: to meet that objective of extending the TV campaign. Casual online gaming: on average 200 million people a year globally are engaging in fun, simple, quick casual games. That is a fact - you can look that up yourself... So as a vehicle to extend the TV campaign online, we viewed a casual game - if you read back the brief - as it hits the sweet spot over what we were trying to achieve with that audience.”<sup>118</sup>

In effect, the use of new media in this way extends the range and reach of channels being used to advertise alcohol. This is potentially concerning in terms of the volume of alcohol advertising to which consumers are exposed. This exposure extends to those under the age of 18; a difficulty acknowledged by Mr Oak, the Director of Halewood International in relation to the Lambrini brand:

**“Mr Oak:** With regard to new media, in terms of advertising and advertising on sites, specifically we only advertise and the rules are that we can only advertise on sites where 75% of the audience is over 18. That is independently verified. For the sites that we have advertised Lambrini on, a minimum of 88% of the consumers are over 18.

**Dr Naysmith:** That means 25% are under.

**Mr Oak:** I accept that point.

**Dr Naysmith:** There is always going to be an overlap, is there not?

**Mr Oak:** Yes.”<sup>119</sup>

Age-verification pages, whereby internet users are required to enter their date of birth before being allowed access to a website, are a standard feature of alcohol company websites. However, the effectiveness of these controls is very limited, as this exchange from the Oral Evidence illustrates:

**“Dr Stoate:** I am also interested in your assertion that, because you have to put your date of birth in, we can somehow control access to children. One of our advisers said this morning, he put three random dates into a site. Two of those dates did not exist, because they were 29 February on years that were not leap years, and yet he instantly was let into the site. What confidence can we have that these so-called birth date entries are in any way policeable?

**Mr Gill:** I cannot comment for that particular technology example, but the technology should be able to pick up things like leap years and what exists.

**Dr Stoate:** It does not, I can assure you, because we have got examples of this, and it is not beyond the wit of most children to make up a date of birth which makes them sound as though they are 19 or 20. How are you going to police that?

**Mr Gill:** If they do that and they wilfully lie to gain access to content, be that on an alcohol site or something more explicit than that, then that is their wilful choice to lie. The only way you could absolutely 100% guarantee it is to link it to a National Identity Register, or something like that, or we could lean on perhaps technology leaders such as Google to come up with some biometrics, but then that gets into a whole debate around personal data and privacy and that area.”<sup>120</sup>

This response suggests that responsibility for children accessing alcohol industry websites lies not with the industry itself but with children who “wilfully lie”.

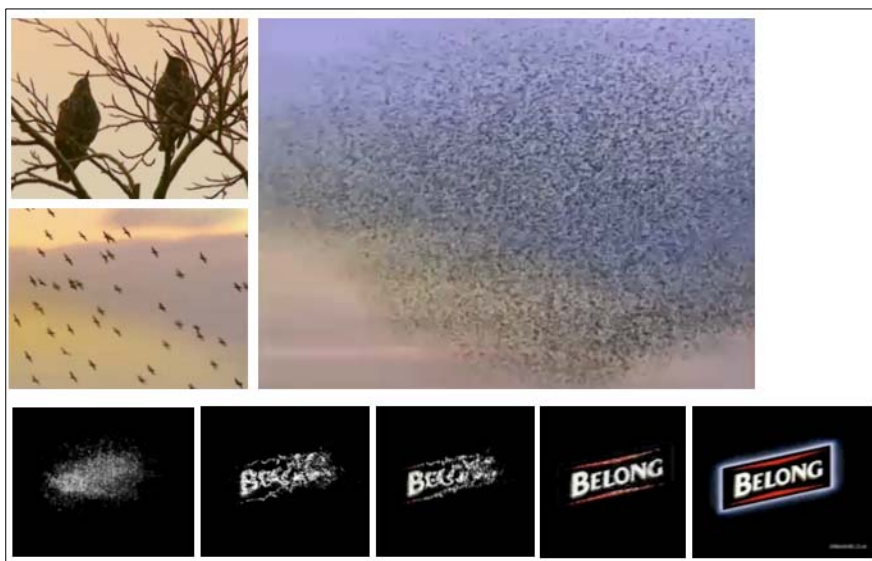
## 7. REGULATORY FAILURE

The introduction to this report points out one large conceptual flaw in the current regulatory system for alcohol advertising: the codes focus only on content, and not on the overall amount of advertising. The analysis of internal marketing documents, however, shows that even within this limited remit there are at least two systemic failings. First, the sophisticated communications and subtle emotional associations that comprise modern advertising often defy intelligent analysis by the regulator. Second, producers and agencies can exploit the ambiguities in the codes and push the boundaries of acceptability. This section illustrates these two problems.

### Defining the Indefinable

The advertising codes proscribe many types of message as has been illustrated throughout this report. Drinking cannot be associated with social success for instance, or masculinity. However, such concepts are open to multiple and contested interpretations.

For example, an ad for Carling launched in 2006 featured a flock of starlings forming up and performing aerial aerobatics to create the word ‘BELONG’ in the style of the beer’s logo<sup>121</sup>:



Formal complaints to the ASA by Alcohol Concern and members of the general public argued that the ad suggested that drinking could lead to social success and overcome loneliness<sup>122</sup>. Carling executives responded by saying that “*their research indicated that consumers thought the ad referred to sociability and social norms, but not conformity*”<sup>123</sup>. The complaint was rejected by the ASA because “*the ad did not imply alcohol contributed to the popularity of an individual or the success of a social event*”<sup>124</sup>. This may seem a defensible judgment looking at the ad in isolation; however, an examination of internal planning documents from the months immediately prior to the campaign’s launch illustrates the real thinking behind the ad.

A strategy document states that “*Carling celebrates, initiates and promotes the togetherness of the pack, their passions and their pint because Carling understands that things are better together*”<sup>125</sup>. It goes 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 document goes on 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 ‘Starlings’ ad actually takes the audience through all three of the stages of belonging. First, it illustrates *“the moment when an individual joins a group”* through a sequence of pictures where individual birds join the flock, which gradually grows larger and larger. Next, the ad gives us *“the joy of belonging”* as the flock of thousands of birds turns into swirling and swooping cloud-like formations. We reach the final step of *“the power of belonging”* as the flock of birds transforms into a swarm of dots that are drawn together and finally manifest as the Carling logo with the brand name being replaced with the word ‘BELONG’.

In the light of these documents the ASA’s conclusion that *“the ad did not imply alcohol contributed to the popularity of an individual or the success of a social event”* becomes completely implausible.

Proscribed constructs such as masculinity and femininity are also extremely elusive. Below is an excerpt from the oral evidence in which the Marketing Director of Beverage Brands, the makers of WKD, tries unsuccessfully to parse the difference between maleness and masculinity.

**“Sandra Gidley:** Turning to page 19, that is a planning brief from earlier this year. This is again the WKD brand. The importance of advertising and campaigns to communicate maleness and personality. Under the code you are not allowed to use masculinity. What is the difference between masculinity and maleness?

**Ms Carter:** What you need to understand is that RTD [Ready To Drink] as a category has always been predominantly very female focused in terms of a lot of the brands being targeted at women. We saw that there was an opportunity to bring to market a product that had male appeal. For us, it is not about being overtly female as opposed to overtly male. For example, we would not ever do a promotional link with makeup. That is why we would associate with the Nuts football awards that my colleague spoke about earlier. It is about engaging with our male consumers in things that they are interested in.

**Sandra Gidley:** What is the difference between masculinity and maleness?

**Ms Carter:** You can be involved in areas that males are interested in without overtly saying, “I, WKD, am a male product.” To communicate maleness would be the Nuts football awards. Nuts is part of the male press so that is an

opportunity for us to talk to male readers. The fact that it is in a male piece of media means that it is not viewed as being overtly female or girlie.

**Sandra Gidley:** Why does it not fall into the masculinity category? I am struggling to find the dividing line between maleness and masculinity.

**Ms Carter:** What we are talking about is that often maleness can be placed into the media. It does not have to be us creatively talking about maleness. It can be the Nuts football awards, using male press. Communicating maleness can be done by using male platforms as opposed to a creative look that says, "I am a male brand."

**Sandra Gidley:** Is this not in effect though a brief that says, "Go as far down the maleness route as you can without breaching the masculinity code. Push it a bit"?

**Ms Carter:** No, not push it a bit at all. We operate within the codes and the codes are there for a reason. We welcome them because they give us a framework to work within."<sup>126</sup>

## Pushing the Boundaries

It is clear from the internal marketing and advertising documents that alcohol producers and their communications agencies are acutely aware of the regulatory framework. In many cases there are genuine attempts to adhere to this (Diageo, for instance, has its own internal marketing code to guide its agents); in others, however, both the spirit and the letter of the codes are challenged and the boundaries are pushed.

Thus, in a briefing document for the WKD brand, staying within the BACC/ ASA/ Portman guidelines is identified as a "*communications challenge*"<sup>127</sup>. Another goes on to explain that "*this means we can't rely on the staple ideas around getting pissed and shagging and need to be more creative and inventive with ideas.*"<sup>128</sup> The snag is that the target audience is attracted to things that "*are inherently impure/flawed*" and the trick, as Smirnoff's agency JWT explains, is to communicate these concepts without falling foul of the rules:

*"Purity (and probably flawlessness) isn't aspirational for young lads wanting to have the time of their lives... Many of the things that they like are inherently impure/flawed.... But incorporating these things into communications is fraught with DMC [Diageo Marketing Code] difficulties...that's not say it is impossible"*<sup>129</sup>

Lambrini documents express the problem even more starkly, pointing out that it is difficult to maintain the "*personality of the brand*" without resorting to unacceptable messages:

*"I think potentially a certain type of creative idea might be able to help us get around the 'promoting getting drunk' challenge (although doing so and keeping the personality of the brand might be difficult), ...."*<sup>130</sup>

Lambrini's producer, Halewood International, is equally unsubtle in its attempts to retain the "Lambrini Girls Just Wanna Have Fun" (LGJWHF) strapline, initially proscribed by the regulator in 2007. An email string exposes a high degree of cynicism. It begins with a note from Halewood International to its agency BJL confirming that the intent is to debate "*vigorously*" with the regulators in favour of the strapline. BJL's response says that it will

take the lead to disguise HIL's involvement and proceed in a way that does not "raise any unnecessary attention/suspicion from the BACC".

In February 2009 an approach is made by BJL to Clearcast, the regulatory body responsible for pre-vetting television adverts, about the use of the LGJWHF strapline. Clearcast replies in unequivocal terms that the strapline is still unacceptable:

*"You guys tried to get "Lambrini girls just wanna have fun" approved in 07. It was unacceptable then and it is unacceptable now. This was the SEC's decision from the last time you submitted this line:*

*'we thought saying 'girls' was wrong as that implied women under 18, and wanna have fun in an alcohol ad could imply getting pissed on cheap alcowine.'*

*"What music were you going to use? The tie in with the Cyndi Lauper song about teenage rebellion was also problematic, and this combined with the dancing and the product being at the riskier end of the alcohol spectrum made the endline a problem. You need to rethink this endline."*<sup>131</sup>

In response, BJL disingenuously implies that it was unaware of any problem with LGJWHF, and offers simply to change the soundtrack: "I'm so sorry we only took over the account in May 2008 so that must have been a previous agency. If we were to use a different sound track would this make any difference?" Clearcast, to its credit, robustly rebuffs the approach:

*"I am afraid the biggest problem is the line itself, it promotes or at least sounds like it is targeting young girls, and promotes getting pissed. Even without the music and the line itself is a play on the well known song, I don't think you will have much luck with trying to get this through as it is."*<sup>132</sup>

Following through on its promise of vigorous debate, Halewood International then seeks legal advice in the hope of finding "some alternative lines of argument", demonstrating in the process that the clear priority is profit – to "capture that pot of gold!!" - not responsible marketing:

*"Can I ask that you give [name] a call/share the ASA/BACC draft letter as she may be able to offer some alternative lines of argument.... I just know that we can get to the end of the LGJWHF rainbow and capture that pot of gold!!"*<sup>133</sup>

Halewood's persistent attempts to retain the strapline contrasts with its spokesperson's claim to the HSC that Halewood "always insist that we stick to the letter and the spirit of the code"<sup>134</sup>.

The depth of the company's cynicism became clear in 2008 when a young girl died after drinking excessive quantities of Lambrini, prompting prominent tabloid coverage which was noted by Halewood from a 'Google News Alert' for Lambrini<sup>135</sup>. A circulated link to The Sun quoted the LGJWHF strapline in its front page coverage: "Holly 17, said the girls were sinking Lambrini – advertised as a sweet wine for 'girls who just wanna have fun' – and strong almond Liqueur Amaretto"<sup>136</sup>.



Suddenly the company wants to lose the strapline: a series of emails between the company and its PR agency urge the need to “ensure that GJWHF is removed / no longer used on any external and internal Mktg collateral / paperwork. If we don't then ongoing it's always going to pick the press up”<sup>137</sup>. The prime concern now is to ensure that the brand itself is not tainted as a result of the incident through repeated use of the strapline in the news coverage. The same email points out that in this respect, the brand is a victim of its own success in creating such a resonant and memorable strapline in the first place: “ironically we have to accept that HIL [Halewood International] was very effective in emdedding the strapline with the media in the first. Something most brands would kill for!!”

At the same time the PR risks are made abundantly clear:

*“[Name] and I spoke on this and I suggested you let this one pass on the basis that someone has died in this story and you would look pretty heartless as a company if we picked up the phone to the journo about our strapline set against the context of what happened and if I was the journo taking such a call, I'd give you a good kicking!!!”*

*That said it does make sense to remove all references to the old campaign if you want to minimise risk of future occurrences - guess that is a not insignificant cost issue though?”<sup>138</sup>*

Thus the focus, again, is on money.

The evident cynicism is the most striking dimension of this case study, but it also serves to illustrate the terminal weakness of alcohol regulation in the UK. The notorious ‘Lambrini Girls Just Wanna Have Fun’ 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. As its website boasted in June 2009 – where the offending material was still being displayed<sup>139</sup>:

"Lambrini girls just wanna have fun" was first used in 1999. Subsequently this successful strapline has been used across 10 and 30 second TV advertising, 48 and 6 sheet posters, tube posters, Blackpool trams, bus ends, taxi wraps plus much more over the years!

## 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.

This is reminiscent of latter day tobacco advertising for brands like Silk Cut and Benson & Hedges that became more and more elliptical and imaginative as the codes on content were tightened. Judging whether the resulting references breached content codes became an impossible task. Furthermore, as David Abbott, a leading advertiser of the time, argued the codes actually act as a stimulus, not a constraint, on creative imagination.

Thus the self-regulatory codes do not protect young people; they just hone the advertiser's skills – either in camouflage or creativity.

**Gerard Hastings<sup>4</sup>**

**November 2009**

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<sup>4</sup> I would like to thank Oona Brooks, Martine Stead, Kathryn Angus, Thomas Anker, and Tom Farrell for their assistance with this memorandum

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