

## Growing up in the online world

Alcohol Change UK is a leading UK charity working to reduce alcohol harm. **We are not anti-alcohol. We are anti-alcohol harm.** Our vision is a society free from alcohol harm, delivered through five key changes: improved knowledge, better policies and regulation, shifted cultural norms, improved drinking behaviours, and more and better support and treatment. We focus on evidence and compassion.

We produce research, deliver the incredible Dry January® challenge as part of the year-round behaviour change programme: Try Dry®, provide leading edge training to public-facing professionals including on our award-winning Blue Light approach, provide independent information to the public, and share our expertise with Governments to help them to improve the nation's health and wealth.

We welcome the opportunity to provide a response to the Department for Science, Innovation and Technology's consultation on growing up in the online world. Due to the nature of our work, we have responded only to questions where we can share evidence on risks related to alcohol harm.

### Chapter 1: Understanding how children use technology

#### What are the harms or risks of social media use, and being online, for children?

Social media use and being online exposes children to alcohol marketing, which normalises alcohol consumption and increases the likelihood of higher risk behaviour with alcohol. This is highly problematic as alcohol is a restricted product and should not be advertised to children, let alone target them specifically.

Although advertising codes prohibit advertising alcohol to children,<sup>1</sup> reality does not reflect this. Currently, alcohol marketing in the UK is regulated through a combination of industry self-regulation and voluntary Advertising Standards Authority (ASA) codes which are not binding through legislation. Reports from the World Health Organization (WHO) and academic research have shown that this approach fails to protect children from exposure to alcohol marketing.<sup>2 3 4</sup>

Young people are frequently being exposed to alcohol marketing, despite it being an age-restricted product. In 2021, the Alcohol Health Alliance reported that over 40% of young people had seen alcohol adverts on social media platforms such as YouTube, Facebook,

Snapchat, Instagram or others in the past month<sup>5</sup> – a figure that is likely to have only increased in recent years. More recent international evidence indicates that young people see up to 20 alcohol advertisements per hour on social media.<sup>6</sup> While there have been reports of sweet, colourful, pre-mixed alcoholic drinks targeted at younger generations ‘blowing up’ on social media platforms like TikTok,<sup>7</sup> marketing does not need to target children and young people directly to cause harm. Exposure to content primarily intended for adults still shapes attitudes and normalises drinking culture from a young age. This is very relevant as the UK has some of the highest rates for alcohol consumption among children as young as 11-years old, compared to other OECD countries.<sup>8</sup>

Alcohol marketing normalises alcohol consumption as an “essential” part of UK culture. This normalisation starts early in life, and the impact is cumulative.<sup>9</sup> Systematic reviews and meta-analyses consistently show a strong causal relationship between children’s exposure to alcohol marketing and higher risk behaviour with alcohol. This includes starting to drink alcohol at a younger age and drinking at higher volumes.<sup>10 11 12 13 14</sup> Alcohol companies rely on heavier drinking for their profits,<sup>15</sup> and their marketing has been shown to target young people to recruit the “heavy-using loyalists of tomorrow”.<sup>16</sup> This is particularly worrying as early onset drinking is a predictor of hazardous drinking in adulthood,<sup>17</sup> and the developing brain is particularly vulnerable to alcohol’s effects.<sup>18</sup>

Recent systematic reviews have found an association between exposure to digital alcohol marketing and alcohol-related behaviours among young people,<sup>19</sup> from experimenting with alcohol to its continued use.<sup>20</sup> Additionally, another systematic review has concluded that participating and engaging with digital alcohol marketing is positively associated with increased alcohol consumption and increased binge or hazardous drinking behaviour.<sup>21</sup> Exposure to digital marketing specifically was associated with 75% greater odds of alcohol use, 80% greater odds of ‘binge drinking’, and 78% greater odds of susceptibility for those who have never drunk before to start drinking.<sup>22</sup>

The alcohol industry uses a number of strategies to market their products online and grow their audiences, including partnerships, travel-themed giveaways, and consistent posting.<sup>23</sup> Online and mobile platforms have transformed the way marketing works. We can receive personalised notifications, promotions, and marketing based on our interests, and when we click on these we’re taken straight through to making an order. Because of how personalised these are, they are very difficult to track and monitor, as they are visible only to their targets, and invisible to others like regulators.<sup>24</sup> In the UK, advertisers are not meant to do this for age-restricted products and the codes also require advertisers to consider the possibility that young people will see them, even when not directly targeted.<sup>25</sup> However, this regulation does not work as effectively as it.

Marketing on social media can appear when friends like, comment, and share, and marketing strategies also encourage consumers to make their own user-generated content. This makes the content more influential, as part of peer group norms.<sup>26 27</sup> Research has shown that while adolescents perceive both peer and influencer posts as sending the message that drinking is acceptable, normal, or cool, adolescents believe they are more likely to be influenced by peers’ alcohol posts than influencers’ alcohol posts, with some exceptions.<sup>28</sup>

The rise in influencer-generated content is also concerning, as research has shown a positive association between influencers promoting products and adolescents' purchasing intentions.<sup>29</sup> Adolescents are frequently exposed to influencers' alcohol-related posts which depict alcohol in a positive light.<sup>30 31 32</sup> A significant proportion of this content is also ephemeral, meaning that the scale of the children and young people's exposure is difficult to quantify.

On Instagram, for example, content analysis has revealed that from 120 popular social media influencers in Belgium, most (115, 95.8%) shared at least one alcohol reference in their feed messages, and even more so on stories which disappear after a time period, with the majority of alcohol references (1,675 of 2,307, 72.61%) shared in Instagram stories rather than feed posts (632 of 2,307, 27%), emphasizing positive outcomes of alcohol use, without explicitly revealing partnerships or paid advertising.<sup>33</sup> In fact, researchers suggest that the alcohol industry is using influencers to circumvent regulations that prohibit advertising to minors, as influencer content is frequently not labelled as an advertisement.<sup>34 35</sup>

Another example comes from TikTok, a platform which has a considerable amount of underage users, from under 18s making up 28% of users in June 2022,<sup>36</sup> to 13-17 year-olds making up 21% of users in 2024.<sup>37</sup> Alcohol advertising is largely banned, with videos not allowed to promote alcohol, or be "Showing or promoting young people participating in gambling, using alcohol, tobacco, or fireworks, or having weapons".<sup>38</sup> As part of an ASA project investigating alcohol ads in social media, the ASA asked TikTok, amongst other social media platforms, for data covering 1 February to 31 March 2020, and TikTok "reported that advertising of alcohol products was (and remains) prohibited on their platform."<sup>39</sup> However, alcohol advertising still occurs through direct influencer advertising, the presence of alcohol companies or service accounts, online bartenders, indirect alcohol sponsorship via creator page links, and user-generated content.<sup>40</sup> Another study found that the majority of videos (98%) using the hashtag #alcohol on TikTok showed alcohol use positively, with very few (4%) mentioning potential negative effects, despite these videos being collectively viewed over 290 million times.<sup>41</sup> The most-viewed alcohol-related videos on TikTok are heavily viewed, and usually (61%) show the rapid consumption of multiple drinks.<sup>42</sup>

In 2021, a report published by Reset Australia exposed how Facebook collected and profiled children's data for targeted advertising, developing profiles which categorized children as being interested in alcohol and other harmful products.<sup>43</sup> These profiles allowed the alcohol industry and others to target minors aged 13-17 through personalised advertising. As part of the study, young people aged 16-17 were asked their opinion on how Facebook and Instagram use their data, and 78% noted concern about the volume of data collected about them, the advertising profiles Facebook created, and about two thirds of young people disapproved of being profiled for commercial advertising purposes. Young people's data should not be used for marketing purposes.

Alcohol producers, retailers and the companies and teams who market the products are constantly honing the tactics they use to persuade us to buy and drink their products. More recently, these tactics include taking the data from our online activities and purchasing history and using this to craft personalised marketing with the use of Artificial

Intelligence (AI).<sup>44 45</sup> Online platforms, algorithms and the collection and use of consumer data pose new and changing challenges for the regulation of alcohol marketing, as brands are woven into the fabric of conversations, holiday snaps, and connections people make online.<sup>46</sup> Such interactions both shape the wider cultural story about alcohol, and influence alcohol consumption.

According to the University of Cambridge, the metaverse is “An interconnected world of extended reality [...] that will reshape how we work, play and communicate.”, “[...] a merging of virtual, augmented and physical reality [...]”.<sup>47</sup> Studies have shown that alcohol companies are using novel immersive marketing techniques in metaverses and that research on their impact is needed.<sup>48 49</sup> Even more worryingly for our young people, marketing strategies include virtual drinking, such as virtual beer tasting, virtual beer vending machines, virtual bars, and virtual distilleries,<sup>50</sup> gamifying a product which in the offline world is meant to only be marketed to adults. As the researchers posit, “we cannot let the metaverse develop unscrutinised, nor without effective strategies to protect the health and well-being of young people.”<sup>51</sup> While it is currently unclear how effective age verification technologies are for accessing a metaverse, and for accessing age-restricted environments within a metaverse, according to UNICEF, “Tens of millions of children and young people are already active in virtual environments and game spaces.”<sup>52</sup> This suggests that online alcohol advertising in metaverses should be examined and strategies put in place to protect children and young people.

## Chapter 2: Interventions for safer, more positive experiences

**What do you think the impact would be of introducing age restrictions on AI chatbots or certain features and functions? For example, impacts on the safety and wellbeing of children, or the impact for parents and carers, as well as other users. You could also comment on the impact on all users' privacy and data or on business costs, revenue, and innovation.**

Research has shown that there are risks associated with children's use of chatbots to search for alcohol-related information and advice. The “Fake Friend” report from the Center for Countering Digital Hate identifies how ChatGPT is creating dangerous advice about self-harm and suicide, eating disorders, and substance abuse, including offering a personalised plan for getting drunk and hiding intoxication at school.<sup>53</sup>

## Chapter 4: Preparing children for a digital future

**What should be considered when taking further action to support positive online spaces and content for young people? For example, how would this work in practice for services, taking into account**

## ***existing best practice across industry, and who should feed into future guidance.***

Restricting online alcohol marketing will support the development of positive online spaces and content for young people. The World Health Organization suggests a range of policy options to protect children and young people from alcohol-related harm online, including restricting their access to digital spaces, introducing age verification, and content restriction, amongst others.<sup>54</sup> The report concludes that “the best protection from exposure of digital marketing of alcohol, with its associated risks, is to remove it from all online contexts”, suggesting a global and comprehensive approach to tackle global marketing and transnational advertising, as was done with tobacco. WHO proposes a number of strategies to ensure enforcement of restricting digital alcohol marketing, including geoblocking and IP address blocking.<sup>55</sup> They suggest that lessons can be learned from other countries and contexts, citing Italy, Latvia, and Lithuania, who have completely banned gambling advertising. Closer to home, research in Scotland has identified restrictions on alcohol marketing as a crucial policy to protect children from alcohol harm.<sup>56</sup>

Researchers analysing the developments in online marketing have argued that regulation needs to be aimed not just at the content of marketing but at the infrastructure itself – such as the use of data for targeting, algorithms and ‘nudges’.<sup>57</sup> Regulatory responses need to address alcohol marketing on digital platforms as a dynamic, participatory, and data-driven process.<sup>58</sup>

Support for restrictions on alcohol marketing is generally high, particularly when related to children’s exposure. A Savanta poll commissioned by Alcohol Change UK in 2024 found that 61% of UK adults supported ‘not allowing alcohol marketing where it can be seen by large numbers of children’, while only 11% opposed this measure. Similarly, a regional survey by Balance in the North East of England found 83% support for policies that would reduce the exposure of children to alcohol promotion and marketing.<sup>59</sup> There is also support for online advertising restrictions, as almost half of the adult population support not allowing alcohol marketing online (45%), with only 21% opposing this measure.<sup>60</sup>

The alcohol industry and its representatives must not feed into the development of future guidance. The issues with self-regulation of alcohol marketing are well-documented, both internationally<sup>61</sup> and in the UK,<sup>62</sup> including the lack of meaningful sanctions. There is a growing body of research showing that the alcohol industry tries to distract public health objectives through industry-funded charities.<sup>63</sup> Public health advocates have developed guides to inform decisionmakers interactions with unhealthy commodity industries.<sup>64</sup>

We are happy to be approached after the submission of this consultation response if we can provide further details on the above, or help the government with its development of policies to protect children and young people from alcohol marketing.

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