



THE SEVEN KEY MESSAGES OF THE ALCOHOL INDUSTRY

Information for everyone who wants to be aware
of the real intentions of the alcohol industry

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INTRODUCTION

The alcohol and tobacco industries sell products that are dangerous for our health. For this reason governments take actions which are based on evidence to reduce harms, like raising taxes, limiting availability, restricting advertising and sponsorships, enforcing legal purchase age limits and informing their citizens about the health risks linked to alcohol. The policy advice of the World Health Organization (WHO) to reduce alcohol harm is also based on these measures.¹

Research shows that alcohol, tobacco and pharmaceutical companies share similar concerns and have used similar strategies and arguments to defend their products and prevent or delay effective policies to reduce the health and social risks to society linked to them.²

The intention of this brochure is to inform professionals, civil servants and politicians about the strategies of the alcohol industry to influence national, European and global alcohol policy.

Certain projects and strategies of the alcohol industry look constructive, but are ultimately aimed at preventing or delaying effective governmental action.

If you have comments on this brochure or if you have new examples of the alcohol industry's lobbying and marketing activities, please send them by email to EUCAM, the European Centre for Monitoring Alcohol (eucam@eucam.info).

¹ 'BEST BUYS' and other recommended interventions for the prevention and control of noncommunicable diseases. WHO (2017); updated appendix 3 of the global action plan for the prevention and control of non-communicable diseases 2013-2020.

² N. Freudenberg; Lethal But Legal; Corporations, Consumption, and Protecting Public Health; Oxford University Press 2016.



More than 3 million people died as a result of harmful use of alcohol in 2016, according to a recent report released by the World Health Organization (WHO).³ This represents 1 in 20 deaths.

More than three quarters of these deaths were among men. Overall, the harmful use of alcohol causes more than 5% of the global disease burden. In the WHO European region on average about 2545 adults died of alcohol every day in 2016.⁴ “All countries can do much more to reduce the health and social costs of the harmful use of alcohol,” said Dr Vladimir Poznyak, Coordinator of WHO’s Management of Substance Abuse unit. “Proven, cost-effective actions include increasing taxes on alcoholic drinks, bans or restrictions on alcohol advertising, and restricting the physical availability of alcohol.”

³ www.who.int 21-09-2018

⁴ Making the WHO European Region Safer; Developments in alcohol control policies, 2010-2019; WHO, 2021

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Introduction

Alcohol is a product associated with advantages (taste, mood) as well as a considerable number of disadvantages (health problems, addiction, accidents, criminality etc.). In recent years scientific research has produced more evidence regarding the disadvantages. Especially the health risks and the financial costs for society have become clearer. This new information, for example the carcinogenic nature of alcohol, is threatening for the image and economic viability of the alcohol industry.

The alcohol industry, and in its wake the advertising industry and the retailers, agricultural actors and even sports and culture sector, works to present the image of alcohol as an enjoyable beverage that could be a part of a healthy lifestyle. To strengthen the positive image of alcohol they use the term responsible drinking, suggesting that drinking alcohol can be a responsible choice, yet failing to provide a clear or credible definition of that concept. On the one hand they ignore the serious health risks of alcohol as a carcinogenic and addictive product and refuse to acknowledge the fact that they heavily depend on excessive drinkers for more than half of their profits.⁵ On the other hand, they develop strategies to hamper effective policy measures for reducing harmful drinking all over the world. They also fund research and conduct other activities to demonstrate that the above mentioned policy measures are not effective.⁶

OVERALL STRATEGY OF THE ALCOHOL INDUSTRY: TO PRESENT THEMSELVES AS THE BEST PARTNERS IN REDUCING HARM IN ORDER TO ESCAPE REGULATION

The 11 largest alcohol producers in the world, like AB InBev, Diageo, Heineken and Carlsberg, state: “We have a duty to promote responsible drinking, and tackle alcohol misuse, and we’re in a unique position to do so; we want to ensure our products are only consumed responsibly, so that drinking them is always a positive experience”.

⁵ Sally Casswell et al; How the alcohol industry relies on harmful use of alcohol and works to protect its profits; Drug and Alcohol Review; Oct. 2016.

⁶ Jim McCambridge & Melissa Mialon; Alcohol industry involvement in science: A systematic review of the perspectives of the alcohol research community. Drug and Alcohol Review (July 2018), 37, 565–579

They also claim that they build partnerships at the local, national and global level to improve health and achieve the UN’s Sustainable Development Goals (SDG’s).⁷ See also Industry Message 7, page 19.

“Alcohol industry” means manufacturers of alcoholic beverages, wholesale distributors, major retailers and importers that deal solely and exclusively in alcohol beverages or whose primary income comes from trade in alcohol beverages. The global concentration of the alcohol industry into a small number of large transnational alcohol corporations has increased the industry’s capacity to act individually and in concert in order to influence alcohol policy in the European region at the national, regional, and local levels.⁸ In 2019, the 7 largest brewers in the world jointly produced 1,260,100,000,000 liters of beer, or 65.8 of all beer.⁹

⁷ www.IARD.org. 2017; IARD is an international organisation “dedicated to reducing harmful drinking” funded by the major transnational producers.

⁸ Jernigan, D. H. 2012. Global alcohol producers, science, and policy: The case of the International Centre for Alcohol Policies. American Journal of Public Health 102(1):80–89. Jernigan, D. H., and T. F. Babor. 2015. The concentration of the global alcohol industry and its penetration in the African region. Addiction 110(4):551–560.

⁹ https://www.barthhaas.com/fileadmin/user_upload/downloads/barth-berichte-broschueren/barth-berichte/englisch/2010-2020/barthhaas_report_2020_press_kit_en.pdf

Why you need to read this leaflet?

The increasing flow of information about the damage that alcohol can cause disrupts the pleasant picture that the alcohol industry gladly propagates about its product. Using practical experiences, this brochure explains how the alcohol industry tries to wipe away or minimize the deleterious effects of its product. To this end the alcohol industry uses a determined strategy which is visible both on a global level as well as on national and local level. This strategy will be explained using number of messages communicated by industry either directly or indirectly.

For politicians and health experts it is important that they can recognize and unmask the narratives and messages of the alcohol industry that often include half-truths or whole lies. It is essential that experts have good and exhaustive knowledge of the harmful impacts of alcohol consumption. The alcohol industry tries to prevent this by purposefully ignoring or denying a number of important harmful effects of its products. The consequence of this is that a biased, inaccurate and overly positive picture of alcohol is created in many societies.

Any alcohol consumption confers health risks, including of a range of cancers, and any possible cardiovascular benefits are smaller than was previously understood. Alcohol harms users through intoxication, organ toxicity, and addiction, which cause almost 3 million deaths globally every year.¹⁰

The descriptions of the seven messages are based on practical knowledge gained through years of observation of the statements and practices of representatives of the alcohol industry.

For each of the seven industry messages, this brochure provides a summary of the industry's message and an evidence-based explanation of why this message is misleading.

Each industry message is then broken down using specific examples, which are addressed using reasoning and evidence. The value of the descriptions of the seven messages becomes clear when you are involved in any role in the development of new policies or projects with the aim of reducing alcohol related problems. If the alcohol industry is involved, after reading this material, you will be better able to recognize the one-sided, incomplete, and inaccurate arguments of the alcohol industry.

INDUSTRY MESSAGE 1

CONSUMING ALCOHOL IS NORMAL, SOCIAL AND ENJOYED AS PART OF A BALANCED LIFESTYLE

The image communicated by the alcohol industry

“The regular consumer is social, enjoys life and is at the centre of a vibrant social life”.



SABMiller: We are in the beer and soft drinks business. We bring refreshment and sociability to millions of people all over the world who enjoy our drinks. We do business in a way that improves livelihoods and helps build communities.¹¹

Why this message is wrong

ALCOHOL IS NO ORDINARY COMMODITY

In advertising, alcohol is associated with the essential elements of our existence: happiness, prosperity, pleasure, sportsmanship, and physical beauty. Alcohol users are presented as people who enjoy life, are social, behave responsibly and are an example to others. “When consumed moderately and responsibly alcohol can be part of a balanced lifestyle and plays a positive role in social occasions and celebrations”¹².

The industry claims that because most people use alcohol in moderation, alcohol is an ordinary commodity that should be produced and marketed with minimum regulation and taxes like other consumer products. That alcohol is also related to serious health problems, traffic accidents, violence, child abuse and suicide is something you never see in advertisements.

ALCOHOL IS A LEADING RISK FACTOR FOR OUR HEALTH

The harmful use of alcohol together with smoking are the leading risk factors for population health worldwide and has a direct impact on many health-related targets of the UN Sustainable Development Goals (SDGs), including those for maternal and child health, infectious diseases (HIV, viral hepatitis, tuberculosis), noncommunicable diseases and mental health, injuries and poisonings.¹³ In 2016, the harmful use of alcohol resulted in some 3 million deaths (5.3% of all deaths) worldwide and 132.6 million DALY's (disability-adjusted life years).¹⁴

¹⁰ Kypros Kypri, Jim McCambridge; Alcohol must be recognised as a drug; BMJ 2018;362:k3944 doi: 10.1136/bmj.k3944 (2018)

¹¹ www.ad-inbev.com

¹² www.Diageo.com, 202

¹³ https://sdgs.un.org/goals

¹⁴ WHO, Global Status Report on alcohol and health, 2018

INDUSTRY MESSAGE 2

ALCOHOL PROBLEMS ARE CAUSED BY A SMALL GROUP OF PEOPLE WHO HAVE OTHER PROBLEMS AND THEREFORE CANNOT HANDLE ALCOHOL

The image communicated by the alcohol industry

According to industry messages, problems associated with alcohol consumption are the result of the behavior of a small group of individuals, who should be held responsible for their own problems. Information about responsible use is the best way to prevent alcohol problems.

International Alliance for Responsible Drinking (IARD)

The CEO of the International Alliance for Responsible Drinking: "While alcohol is a normal part of an enjoyable life for the majority of people, for a minority of people, alcohol can be associated with harm".¹⁵

SpiritsEUROPE

However, it is also clear that a minority of consumers misuse alcohol, which can lead to significant harm to themselves, their families and society at large. As producers of spirit drinks, we take our role in society seriously - we make great efforts to reduce alcohol-related harm without punishing moderate, responsible consumers.¹⁶

Scotch Whisky Association

There is no such thing as a problem drink, but there are problem drinkers.¹⁷

According to the industry, it's a matter of individual responsibility and these people should be helped by targeted interventions and individualized care. The industry claims it is symbolic politics to think that we can solve these problems by targeting population as a whole by means of restricting availability, price measures and advertising restrictions. Moreover, the industry states that such measures would penalize the majority of individuals who are responsible consumers. However, the reality is the alcohol industry earns most of its profits from the sale of alcohol to adolescents and 'irresponsible' drinkers. Another unwelcome reality is that one of the most successful measures to reduce these alcohol problems is effective pricing policies.

THE ALCOHOL INDUSTRY RELIANCE ON PROBLEM DRINKERS

Studies have shown that significant proportions of alcohol industry sales are linked to heavy drinkers. One study in England found that two thirds of alcohol industry revenue came from those drinking at risky levels, with 38.2% of the value of total alcohol sales in England from those in the most at-risk group (see Figure 2).

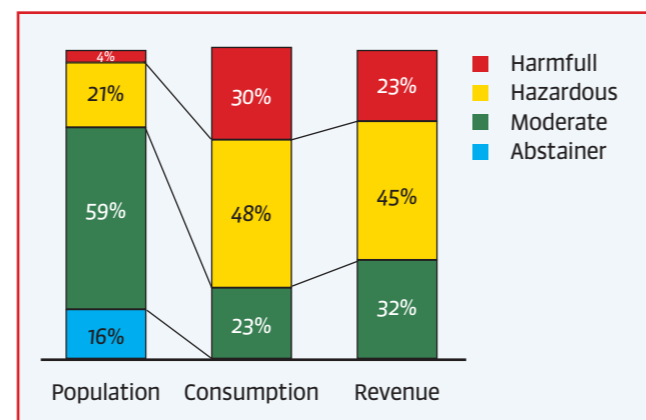


Figure 2: Volume and sales by level of consumption

Why this message is wrong

THE MESSAGE SUGGESTS FALSELY THAT PROVEN POPULATION LEVEL POLICY MEASURES ARE USELESS

The alcohol industry is shifting responsibility for the harmful consequences of alcohol consumption to the so-called problematic, excessive or addictive drinkers. According to the industry, this concerns a limited group of individuals with personal problems who, for that reason, cannot use alcohol responsibly.

¹⁵ IARD is an international NGO "dedicated to reducing harmful drinking" funded by the major transnational producers. IARD was established in 2015 when the industry SAPRO international Center for Alcohol Policies (ICAP) merged with the Global Alcohol Producers Group

¹⁶ SpiritsEurope represents 31 associations of spirits producers as well as 10 leading multinational companies

¹⁷ www.scotch-whisky.org.uk (2020)

From another study in higher income countries, heavier alcohol consumption occasions were found to make up approximately 50% of sales; and in middle-income countries 76% of sales were from alcohol consumption in excess of the WHO heavy episodic alcohol intake definition.^{18,19} As well as accounting for the highest revenues for the alcohol industry, heavy episodic drinkers and those with alcohol dependence account for a significant proportion of the harm.

HEAVY DRINKERS ACCOUNT FOR A SIGNIFICANT PROPORTION OF THE HARM BUT ALL GROUPS OF DRINKERS BENEFIT FROM EFFECTIVE ALCOHOL POLICY

The alcohol industry framing of alcohol-related harms as being absent from the moderate majority of responsible drinkers allows them to argue against evidence based alcohol control policies that apply to the entire population, and keep their sales revenue high.

Although the heaviest drinkers have a much higher risk of various alcohol-related harms compared to other drinkers, they do not necessarily account for most of the alcohol-related burden of disease and disability.²⁰ Alcohol-related problems are widely distributed across the population of drinkers, including those who drink moderately most of the time. This is especially true with respect to acute alcohol related consequences, such as alcohol-related cancers as breast and bowel cancer, accidents, injuries and violence.

For this reason, prevention measures should be directed at all drinkers using population or universal strategies, rather than focusing exclusively on the small group of very heavy drinkers by means of high risk or targeted strategies. This is often referred to as the Prevention Paradox.²¹

¹⁸ Sally Casswell et al; How the alcohol industry relies on harmful use of alcohol and works to protect its profits; Drug and Alcohol Review; Oct. 2016

¹⁹ Heavy episodic drinking is defined by the WHO as drinking of least 60 grams alcohol (6 glasses) or more on at least one occasion in the past 30 days

²⁰ Babor, T., et al; Alcohol: No Ordinary Commodity - Research and Public Policy. 2nd edition, Oxford: Oxford University Press, 2010

²¹ Kreitman, N. (1986). Alcohol Consumption and the Preventive Paradox. British journal of addiction, 81(3), 353-363.

INDUSTRY MESSAGE 3

RESPONSIBLE ALCOHOL CONSUMPTION IS PART OF A HEALTHY LIFESTYLE

The image communicated by the alcohol industry

Alcohol is a tasty drink which is prepared with craftsmanship; for beer the 'natural origin' counts, wine is particularly beneficial for body and spirit, and for liquor the age-long tradition guarantees quality. Moderate drinking is responsible and even has some health benefits.



GUINNESS IS GOOD FOR YOU

For the past several decades, the alcohol industry has spread the message that moderate drinking provides a variety of health benefits and should be considered as part of a healthy lifestyle.²² Guinness's advertising slogan, "Guinness is good for you" dates back to the 1920s.

Sources:

- John Gilroy, Original Vintage Guinness for Strength Poster By J Gilroy Irish Stout Beer Drink, 1934
- <https://www.guyandtheblog.com/5-benefits-of-drinking-wine/>
- <https://beerpreneur.wordpress.com/2013/04/05/health-benefits-of-drinking-beer/>



EVERYTHING ABOUT BEER IS HEALTHY

In 2012, Heineken, the Dutch brewing giant, touted the health benefits of beer on a major news outlet.²³ According to the then chief commercial officer, "There is everything healthy about beer." In addition to having fewer calories than milk, he argued, beer is "one of the few drinks that is purely natural." More recently Heineken stated a more nuanced version of this concept: when alcohol is consumed in moderation, it can be part of a well-balanced lifestyle.²⁴

23 Barnato, K. (2012). Drink up, Beer is Health Says... Heineken Exec. CNBC. <https://www.cnbc.com/id/49692711>. Accessed 7 December 2018.

24 <https://www.theheinekencompany.com>

22 Portman Group. (2017). About. <http://www.portmangroup.org.uk/about/history-and-mission>. Accessed 7 Dec 2018.



Promotion of the goodness of German beer²⁵

Why this message is wrong

ALCOHOL IS CARCINOGENIC HARD DRUG

For the alcohol industry it is difficult to accept the relatively new research findings that even one glass a day is not free of health risks.²⁶ The fact that alcohol is a carcinogenic substance is contested, ignored or framed within an alternative perspective by the alcohol industry.

Chemically, alcohol is a hard drug, which like heroin and nicotine can cause physical and psychological dependence. This image poses a contradiction to the depiction of the responsible, social, happy and regular drinking citizen. Recent research shows that the more people are aware of the relationship between alcohol consumption and breast cancer, the greater the support for a restrictive alcohol policy.²⁷

THE TERM RESPONSIBLE DRINKING IS A VAGUE CONCEPT

Responsible drinking is a strategically ambiguous, industry-promoted concept that allows for multiple interpretations. Industry sources rarely reference government drinking guidelines in the context of responsible drinking, stressing individual responsibility and risk management. Public health practitioners should be aware of these distinctions and use clear language regarding lower risk drinking.²⁸

25 <https://slowtours.com/blog/food-wine/why-is-german-beer-so-good>

26 Alcohol and cancer in the WHO European Region: An appeal for better prevention (WHO, 2020)

27 Zie Bates at all. BMC Public Health; 2018 18: 688

28 N. Maani Hessar & M. Patticrew; What does the alcohol industry mean by 'Responsible drinking'? Journal of Public Health (2018).

EVEN LOW LEVELS OF DRINKING ARE NOT SAFE

For years, the alcohol industry has been helped by the idea, echoed by poorly designed studies and government advice, that low levels of consumption were thought to have some protective health benefits (i.e., for the prevention of heart disease). There may be health benefits derived from the consumption of moderate amounts of alcohol, but they seem to be very limited, they apply mainly to older drinkers, and the benefits realized in one health condition (for example heart disease) can be offset by increased risks of alcohol causing another health condition (for example cancer). As concluded in a recent study by the Global Burden of Disease Collaborators, there is no safe limit.²⁹



ALCOHOL AND CANCER

Cancer risk from alcohol is linear (i.e. the more you drink, the more your risk goes up). Even low levels of alcohol, like those recommended in various moderate drinking guidelines can raise the risk of breast cancer.³⁰

The link between alcohol and cancer is strong enough that major organizations including, the World Health Organization, European Cancer Leagues and the American Society of Clinical Oncology³¹ have issued warnings about the effects of drinking on at least seven types of cancer.

29 Griswold, M. G., Fullman, N., Hawley, C., Arian, N., Zimsen, S. R., Tymeson, H. D., ... & Abate, K. H. (2018). Alcohol use and burden for 195 countries and territories, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016. The Lancet, 392(10152), 1015-1035.

30 Cao, Y., Willett, W. C., Rimm, E. B., Stampfer, M. J., & Giovannucci, E. L. (2015). Light to moderate intake of alcohol, drinking patterns, and risk of cancer: results from two prospective US cohort studies. Bmj, 351, h4238.

31 <https://ascopubs.org/doi/full/10.1200/JCO.2017.76.1155>



<https://www.myprincegeorgenow.com/63260/yukon-warning-labels-alcohol-met-intrigue-canadian-cancer-society/>

MISREPRESENTATION OF EVIDENCE BY THE ALCOHOL INDUSTRY

A qualitative analysis of 27 industry websites and documents found that the industry engaged in misrepresentation of evidence about the alcohol-related risk of cancer.³²

The research identified three main industry strategies:

- Denying any link with cancer, or selective omission of the relationship;
- Distortion by mentioning some risk of cancer, but misrepresenting or obfuscating its size; and distraction by seeking to draw focus away from the risks of alcohol and towards other cancer risks.

REMOVING OF ALCOHOL AND CANCER WARNING

In the Canadian Territory of Yukon, a study was conducted to evaluate the impact of a warning label on alcohol bottles that provided information about the risks of alcohol such as cancer. Before the introduction of the eye-catching labels, only about 25% of the participants knew that alcohol consumption can cause cancer. After the labels were introduced, awareness rose to 42%. The alcohol and cancer labels were removed by the Yukon government under pressure from the alcohol industry. The argument was that the government did not have the legal authority to place such labels, that the labels violated the industry's freedom of expression, and that the government slandered the alcohol manufacturers.³³ Despite this experience, it is remarkable that, in the context of its action plan on alcohol for 2022-30, the WHO has invited the alcohol industry to bring about ideas to what text should be present on product labels about the health risks of alcohol.³⁴ Independent scientists believe that governments should compile and require health / nutritional information for consumers to be completely independent of the industry.³⁵

33 Th.F. Babor, editor. Special Section: Alcohol Warning Labels. *Journal of Studies on Alcohol and Drugs* 81 (2020) 2: 222-292.

34 World Health Organization (WHO); Working Document for Development of an Action Plan to Strengthen Implementation of the Global Strategy to Reduce the Harmful Use of Alcohol. Geneva, WHO, 2020.

35 Paula O'Brien, Tim Stockwell, Kate Vallance and Robin Room; WHO should not support alcohol industry co-regulation of public health labelling; *Society for the study of Addiction*; 2021

32 Mark Petticrew, Cécile Knai & Elisabete Weiderpass; The strategies of alcohol industry SAPROS: Inaccurate information, misleading language and the use of confounders to downplay and misrepresent the risk of cancer; *Drug and Alcohol Review* (2018)

INDUSTRY MESSAGE 4

ALCOHOL ADVERTISING DOES NOT LEAD TO AN INCREASE IN ALCOHOL CONSUMPTION

The image communicated by the alcohol industry

Advertisements do not make people drink more. They simply assist the consumer in choosing the best brand. In order to prevent a small group of producers or retailers from marketing indecent advertisements, we have established effective rules. This system of self-regulation works globally, is adapted to modern ways of communication and has excellent results. By this we are capable of preventing young people from being confronted with alcohol advertising.



Alcohol industry New Zealand: Adverts don't increase consumption, no need for tighter rules

Although a number of groups, including the New Zealand Medical Association (NZMA), say a recent update to the advertising industry's self-imposed regulations aren't good enough, in New Zealand, the alcohol industry has hit back at calls for greater restrictions on how its product is advertised, saying there's no evidence advertising increases consumption. Nor is it targeting people aged under the legal drinking age, says the New Zealand Alcohol Beverages Council (NZABC).³⁶

36 www.newshub.co.nz; 2020/12

The alcohol industry: advertising is not harmful

Global producers have argued that existing evidence demonstrating associations between alcohol marketing exposure and alcohol consumption is: 'very weak and does not make a compelling case that advertising causes harmful drinking'.³⁷ 'We also commit to only target our marketing at adults of legal purchase age, and to promote safe and responsible drinking as part of a balanced lifestyle'.³⁸

37 David Jernigan in: *Alcohol Marketing and Youth Drinking in: Addiction*; Vol. 112, Jan. 2017.

38 International Alliance for Responsible Drinking (IARD), 2020.

Industry: we regulate alcohol marketing responsibly

The International Alliance for Responsible Drinkers (IARD) states: "Advertising and other forms of marketing are a vital means of communicating between marketers and customers. They help to create efficient markets, both nationally and internationally, promote economic development and bring significant benefits for both consumers and companies, as well as for society in general".³⁹

"We believe that industry self-regulation of alcohol marketing promotes social responsibility; our advertising messages should always be legal, truthful, honest, and consistent with prevailing cultural standards of good taste and social responsibility. We also commit to only target our marketing at adults of legal purchase age, and to promote safe and responsible drinking as part of a balanced lifestyle".⁴⁰

Why this message is wrong

ALCOHOL INDUSTRY IS PRIMARILY A MARKETING INDUSTRY

Alcohol advertising and sponsorship is vital for the alcohol industry to increase brand awareness and to promote alcohol consumption. It is no exaggeration to say that the alcohol industry is primarily a marketing industry and secondly a producer of alcohol. The industry claims that, based on their own advertising rules (called: self-regulation), they are very capable of preventing harmful forms of alcohol advertising and protecting young people. For industry, the promotion of self-regulation is primarily aimed at avoiding stricter legal regulations. Their dominant statement is that alcohol marketing is only intended to assist consumers in choosing a certain product or brand.

SCIENTIFIC EVIDENCE ABOUT THE IMPACT OF ALCOHOL MARKETING

Numerous studies have found that exposure of young people to alcohol marketing accelerates the onset of their alcohol use and increases the amount consumed by those already drinking.⁴¹ Marketing not only contributes to the recruitment of young people to replace older drinkers, it also could have detrimental effects on recovering alcoholics and women who may be encouraged to drink while pregnant.⁴²

39 International Chamber of Commerce, 2020
 40 <https://www.iard.org/getattachment/b1e7f40b-b529-46ec-958d-8bf5fa9d5278/c2-marketing.pdf>
 41 Peter Anderson et al; Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies; In: Alcohol and Alcoholism, 2009
 42 Jernigan, D., J. Noel, J. Landon, N. Thornton and T. Lobstein; Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. Addiction, 2017.

WHAT THE EVIDENCE SAYS ABOUT SELF-REGULATION

"However, evidence suggests that the guidelines of self-regulated alcohol marketing codes are violated routinely, resulting in excessive alcohol marketing exposure to youth and the use of content that is potentially harmful to youth and other vulnerable populations. If the alcohol industry does not adhere to its own regulations the purpose and design of these codes should be questioned".⁴³

"The literature indicated that marketing through digital media is likely to be having an impact upon drinking behaviour, that the marketing activities make use of materials and approaches that are attractive to young people and that current marketing codes are likely to be undermined by digital media".⁴⁴ A qualitative synthesis of 163 studies concluded that "there is persuasive evidence that exposure to alcohol marketing is one cause of drinking onset during adolescence and also one cause of binge drinking."⁴⁵

INVESTMENTS OF THE ALCOHOL INDUSTRY IN ADVERTISING AND SPONSORSHIP.

Alcohol is one of the most "marketed" products in the world.⁴⁶ A study from the USA showed that alcohol advertising media expenditures for all alcohol beverages increased by almost 400% between 1972 and 2012.⁴⁷ The annual sales of the two largest alcohol beverages companies range from \$ 9.4 billion in Denmark to \$ 56.4 billion in Belgium.⁴⁸ Alcohol and driving is not a responsible mix, but Heineken invests over 200 million Euros in Formula 1 Grand Prix Races.⁴⁹



43 Jonathan Noël et al. Alcohol industry self-regulation: who is it really protecting? Addiction, 2017
 44 Tim Lobstein et al. The commercial use of digital media to market alcohol products: a narrative review; Addiction, 2017
 45 Tim Lobstein et al. The commercial use of digital media to market alcohol products: a narrative review; Addiction, 2017
 46 Wilcox G.B., Kang E.Y., Chilek L.A. (2015). Beer, wine, or spirits? Advertising's impact on four decades of category sales. Int. J. Advert. 34(4): 641-57.
 47 Wilcox G.B., Kang E.Y., Chilek L.A. (2015). Beer, wine, or spirits? Advertising's impact on four decades of category sales. Int. J. Advert. 34(4): 641-57.
 48 IOGT International & Big Alcohol Exposed, 2019
 49 <https://www.adformatie.nl/craft/waarom-heineken-de-formule-1-sponsort-en-dit-volgens-het-mer>; October 2017.



Popular influencers on Instagram, promoting alcohol brands (2020).

DIGITAL ALCOHOL MARKETING

Sophisticated and multi-dimensional alcohol marketing strategies increasingly integrate online and off-line promotions. Many young people are the focus of marketing attempts to advertise alcohol on social media. Content can be targeted at an individual level, based on users' preferences and tastes. It's completely different from the options of traditional media; alcohol marketing on digital platforms can be seen as a dynamic, participatory and data driven process.⁵⁰ A study of the research literature available since 2000 on alcohol marketing in digital and social media reports a consistency of findings to support the suggestion that digital marketing is effective and attractive to youth.⁵¹



illustration: Tomas Schats

50 Carah, C and S. Brodmerkel; Alcohol Marketing in the Era of Digital Media Platforms; Journal of Studies on Alcohol and Drugs, January 2021.
 51 Lobstein, T., J. Landon, N. Thornton and D. Jernigan (2017); The commercial use of digital media to market alcohol products: a narrative review. Addiction, 112 (Suppl.1. 21-27)

NEW WAYS OF TARGETING WOMEN

The alcohol industry in particular has turned its eyes on female buyers: "Chick beer" comes in pink packaging with fewer calories. Booze with the name "Mummy's Time Out" targets mums starved for happy hour. And even clothing stores are cashing in, offering T-shirts with slogans like "wine time" drawn in whimsical calligraphy. This has raised particular concerns in low-income countries, where women traditionally abstain from alcohol. Pernod Ricard states: "A growing number of consumers are women. Developing markets are the clear majority of the global human population and women are half of the population. They are customer groups and talent pools that cannot be neglected. Pernod Ricard builds on this diversity and promotes it, to increase innovation, business adaptation and opportunity".⁵² "We've seen a move away from sexualizing women to sell alcohol to men towards alcohol brands trying to align their products with sophistication, women's empowerment and with female friendship," says Professor Carol Emslie.⁵³ "This is really straight out of the tobacco industry playbook, which targeted women with slogans such as 'you've come a long way, baby' in the '60s."



52 <https://pernod-ricard.com/en/download/file/10564/>
 53 <http://eucam.info/2020/09/27/the-feminisation-of-alcohol-marketing/>
 54 Carol Emslie, a professor of substance use and misuse at the School of Health and Life Sciences at Glasgow Caledonian University.

INDUSTRY MESSAGE 5

INFORMATION AND EDUCATION ABOUT RESPONSIBLE USE IS THE BEST METHOD TO PROTECT SOCIETY FROM ALCOHOL PROBLEMS

The image communicated by alcohol industry

Alcohol education and related informational campaigns are the most effective way of tackling alcohol-related harm, particularly regarding young people. We as industry feel partly responsible for certain problems which arise as a result of the abuse of our products. Thus, abuse must be fought strongly and we gladly contribute to this.

PARTNERSHIP: PRATA OM ALKOHOL "TALK ABOUT ALCOHOL"⁵³

The Swedish Spirits and Wines Suppliers (SVL) partnered with organizations including the Swedish Brewers Association to launch this campaign to change 13- to 17-year-olds' attitudes towards underage drinking. Pupils learn how to resist social and peer pressure to drink alcohol through class activities including role playing; these exercises can be run at three different levels to match each class's previous experience with alcohol. Children

also get involved through competitions to create responsible drinking messages, and the campaign advises parents on how to discuss underage drinking with their children and helps teachers to draw in and motivate the whole school.

Bacardi, Diageo, and Pernod Ricard are three of the members of the SVL. The members of the Swedish Brewers Association include Carlsberg.



IMPACT: PREVENTING UNDERAGE DRINKING IN PARTNERSHIP WITH BRAZIL'S SCHOOLS



Pernod Ricard's "Na medida" ("Just right") program aims to prevent underage drinking by teaching minors, their parents, and their teachers about the effects of alcohol and the reasons that underage youths consume it, including low self-esteem, shyness, and peer pressure. The NGO Associação Singulares leads the sessions, which also encourage responsible consumption. The program has been held in 57 cities in Brazil, reaching more than 141,000 students in 429 schools, since its launch in 2011. In 2017, the

program was refreshed, and in that year taught over 20,100 students, 375 parents, and 118 teachers in 26 schools about the risks of harmful drinking.



Why this image is wrong

EDUCATION PROGRAMS ARE NOT THE SILVER BULLET

Alcohol education programs are considered by many to be an important weapon in the fight against under-age drinking. Research shows however that alcohol education programs, in isolation, are not an effective way to prevent underage drinking or alcohol-related problems.⁵⁵

Because these programs are popular with the general public, the alcohol industry supports their development and dissemination. Some of them, like the two examples shown above, are proudly displayed, for example, on the website of the International Alliance of Responsible drinking.⁵⁶

55 David Foxcroft; Cochrane Review: Universal school-based prevention programs for alcohol misuse in young people; School of Health and Social Care, Oxford Brookes University, Oxford, UK; Wiley Online Library 2012

56 www.iard.org

SERVING THE INTEREST OF PUBLIC RELATIONS RATHER THAN PUBLIC HEALTH

The industry's vision is that "Alcohol education starts in the home." Parents and families play the most influential role in shaping attitudes towards alcohol, according to the alcohol industry.⁵⁷ However, research shows that the impact of these programs is very limited. If there are any positive effects, they only appear to be short term. Although many alcohol education programs are produced and funded by the alcohol industry, they seem to serve the interests of public relations rather than public health.⁵⁸

RESPONSIBLE DRINKING CAMPAIGNS MAY EVEN ENCOURAGE ALCOHOL CONSUMPTION

Since the 1990's, researchers have analysed the use of the message "drink responsibly" and have concluded that instead of encouraging moderate consumption, the messages create a favourable image of the alcohol brand without having any influence on excessive drinking. Responsible drinking campaigns can therefore be considered another form of alcohol marketing and may even encourage alcohol consumption.^{59,60}



ALCOHOL INDUSTRY VERSUS THE WORLD HEALTH ORGANIZATION

The alcohol industry is opposed to the policy recommendations of the WHO, among others, to reduce the adverse effects of alcohol consumption. The WHO relies on scientific knowledge about effective measures. The WHO does not give priority to information campaigns about the risks of alcohol to be part of their main recommended policies because they are not sufficiently effective. These three "best buys" of the WHO are pricing policies (e.g., alcohol taxes), restrictions on availability, and bans on alcohol marketing⁶¹. Because of their effectiveness in reducing consumption levels these measures are very threatening for the alcohol industry. In addition, the WHO advises to advance and enforce drinking driving counter measures and to facilitate access to screening, brief interventions and treatment. These so-called SAFER interventions are affordable, practicable and cost effective⁶².

MESSAGE OF THE WHO TO THE INDUSTRY:

DON'T INTERFERE WITH ALCOHOL POLICY DEVELOPMENT

The WHO advises the alcohol industry to contribute to public health by making their products less harmful and attractive to vulnerable populations, and to abstain from interfering with alcohol policy development and evaluation⁶³

The SAFER interventions

STRENGTHEN	ADVANCE	FACILITATE	ENFORCE	RAISE
restrictions on alcohol availability	and enforce drink-driving counter measures	access to screening, brief interventions and treatment	bans or comprehensive restrictions on alcohol advertising, sponsorship and promotion	price on alcohol trough exercise taxes and other pricing policies

57 Portman Group, a so-called social aspects organization of the alcohol industry in the UK.
 58 Robaina, K., Brown, K., Babor, T.F. & Noel, J. (2018). Alcohol industry actions to reduce harmful drinking in Europe: public health or public relations? Public Health Panorama 4(3), 341-359.
 59 Barry A, Goodson P. (2010) Use (and misuse) of the responsible drinking message in public health and alcohol advertising: a review. Health Educ Behav. 2010 Apr; 37(2):288-303.
 60 Pantani D, Peltzer R, Cremonte M, Robaina K, Babor T, Pinsky I. The marketing potential of corporate social responsibility activities: the case of the alcohol industry in Latin America and the Caribbean. Addiction. 2017 Jan 1;112(51):74-80.

61 Global status report on noncommunicable diseases. Geneva, World Health Organization, 2010.
 62 www.who.int/substance_abuse/safer Barry A, Goodson P. (2010) Use (and misuse) of the responsible drinking message in public health and alcohol advertising: a review. Health Educ Behav. 2010 Apr; 37(2):288-303. Pantani D, Peltzer R, Cremonte M, Robaina K, Babor T, Pinsky I. The marketing potential of corporate social responsibility activities: the case of the alcohol industry in Latin America and the Caribbean. Addiction. 2017 Jan 1;112(51):74-80. Global status report on noncommunicable diseases. Geneva, World Health Organization, 2010.
 63 Source: Working document for development of an action plan to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol (Nov. 2020)

INDUSTRY MESSAGE 6

ALCOHOL-FREE AND LOW ALCOHOL BEVERAGES CAN PLAY A ROLE IN REDUCING HARMFUL DRINKING

The image communicated by the alcohol industry

Alcohol-free and low-strength alcoholic drinks⁶⁴ contribute to a healthy lifestyle and are an important alternative, especially in situations where alcohol use is hazardous such as before driving or during pregnancy. We make an important contribution to mitigating problems that arise as a result of the abuse of alcohol by providing a healthy and safe alternative.

⁶⁴ Alcohol free and low strength alcohol are products of the alcohol industry that contain no alcohol or a maximum of 1,2 % alcohol, have a comparable taste as the usual alcoholic drinks and have the same or comparable brand names.

INDUSTRY VIEWS: NO AND LOW ALCOHOL AND SHIFT IN CONSUMER TRENDS

Major shifts in consumer trends have opened up an exciting new path for growth in our industry. Changes in drinking behavior, healthier lifestyles and the simple desire for more choice and variety have all contributed to the rise of the no- and low-alcohol drinks. From Radlers - fruits shandies - to malt-based energy drinks, we've been innovating with low- and no-alcohol drinks for some time. According to Heineken it's a sector that's booming Spearheaded by our flagship Heineken 0.0 beer, we increased high-single digit in 2019.⁶⁵

HEINEKEN: INTRODUCTION OF NON-ALCOHOLIC BEER IS MORE EFFECTIVE THAN ALCOHOL POLICY MEASURES

Director Böhm (Heineken): "All our brands get 0.0 variants." Because with the introduction of Heineken 0.0 in 2016, the beer company has contributed more to the interest in non-alcoholic beer and the dangers of excessive alcohol consumption than years of governmental measures or alcohol and traffic campaigns. Our focus on responsible alcohol consumption, as in Formula 1, has ensured that non-alcoholic beer has become credible."⁶⁶

Why this message is wrong

BRANDING OF NO-AND LOW-ALCOHOL IS BRANDING OF ALCOHOL

No- and low-alcohol drinks contribute to making the brand names of alcoholic beverages more familiar. Advertising no- and low-alcohol with the usual brand names and designs is therefore also a form of branding of alcoholic beverages which will lower the threshold for alcohol consumption for young people⁶⁷. The promotion of these beverages is also a way to circumvent advertising restrictions that are designed to protect young people from exposure to messages that create a favorable image of alcohol products with similar brand names.

Brand advertising is a dynamic tool

In a recent study of a range of alcoholic and non-alcoholic products under the same branding, participants associated the logos primarily with beer—the flagship product. Branding strategies seemed to successfully increase young people's brand familiarity and affected their brand recognition and brand awareness. Brand advertising is a dynamic tool that affects young people's attitudes towards the advertised brands and alcohol use. Due to early exposure to the brands, brand sharing increases brand familiarity and, among other factors, potentially affects drinking attitudes and purchase intentions (see also article 68).

⁶⁷ Ratchakorn Kaewpramkusol et al; Brand advertising and brand sharing of alcoholic and non-alcoholic products, and the effects on young Thai people's attitudes towards alcohol use: A qualitative focus group study; Drug Alcohol Review Actions, 2019



NO- AND LOW-ALCOHOL PRODUCTS ARE NOT MARKETED AS SUBSTITUTIONS FOR THE USUAL ALCOHOLIC DRINKS

No- and low-alcohol drinks can, for some people and in some situations, reduce harmful use of alcohol. But often these 'No-lo' products are used to introduce additional drinking occasions and they are not marketed by industry as substitutions to full-strength drinks. For example, the Heineken Zero campaign is based on things 'Now You Can - i.e. now you can have a beer in the office, at the gym and before driving.⁶⁸



Picture: The pop-up outside bar on a Rio de Janeiro street, which was open for 3 days, invited drivers to drag up and seize a free Heineken 0.0, the model's zero-alcohol lager.⁶⁹

PROMOTION OF ALCOHOL-FREE BEER TO PREGNANT WOMEN

In the Netherlands the 'Kennisinstituut Bier', an organisation mainly financed by the Dutch Brewers, advises pregnant women to drink alcohol-free beer. Kennisinstituut Bier presents itself as the scientific institute for responsible beer consumption and health.⁷⁰



⁶⁸ <https://beertoday.co.uk/heineken-now-you-can-0718/>

⁶⁹ <https://zetbusiness.com/heineken-creates-clever-billboard-that-doubles-as-a-bar/>

⁷⁰ <https://babystraatje.nl/blog/zwanger-100-alcoholvrij/>; www.kennisinstituutbier.nl

NGO ALCOHOL CHANGE UK: IT'S UNLIKELY THAT NO-LOW DRINKS GENERATE REDUCTION IN ALCOHOL HARM

Quoting Alcohol Change: "No-Low drinks are an insufficient response to population-level alcohol harm. They are currently too small in scale to bring significant benefit, and most users do not use them to reduce their alcohol intake. Although No-Low products can be very helpful for individuals, research suggests they are unlikely to generate reduction in alcohol harms across the population. Supporting the growth of the NoLo market is not enough - government needs to do much more to tackle alcohol harm".⁷¹

ADVERTISING OF BEER BRANDS WITH 0.0 IN LITHUANIA, A COUNTRY WITH A COMPLETE MARKETING BAN

In the beginning of 2018 Lithuania implemented a ban on alcohol advertising. Industry responded with a massive effort to market non-alcoholic drinks, to circumvent, but also undermine the ban. There were both simplistic attempts to advertise drinks in a regular brand packaging, which for all purposes looks the same as an alcoholic drink. At the beer maker's days in Kaunas (Lithuania), the "non-alcoholic" degustation was streamed on YouTube, with over 30 thousand viewers, with the brand name on display, and many influencers, media, and famous people in the open-air event.⁷²



PROMOTION OF 0.0 BRANDS FORBIDDEN IN NORWAY

In Norway it's forbidden to promote 0.0 drinks with the same brand name as alcoholic beverages or to include alcoholic beverages in the promotion of other goods or services. The ban was implemented with the objective to prevent that young people are exposed to brand names of alcohol products. Norway has a marketing ban for all alcoholic products.

⁶⁵ www.theheinekencompany.com

⁶⁶ <https://www.parool.nl/nederland/directeur-heineken-nederland-pijn-in-de-hore-ca-blijft-nog-jaren-ba740ec5/>

⁷¹ Source: alcoholchange.org.uk/policy/policy-insights/alcohol-free-and-low-alcohol-drinks

⁷² <https://www.kimkim.com/c/discover-lithuanian-beer-vilnius-kaunas-birzai-5-days>

INDUSTRY MESSAGE 7

ALCOHOL PROBLEMS CAN ONLY BE SOLVED IF ALL PARTIES WORK TOGETHER

The image communicated by the alcohol industry

It is essential that we as industry take part in all serious attempts to address the problems arising from alcohol consumption. We have experience in partnership with scientists, NGO's and governments to reduce harmful drinking.

PARTNERSHIP STATEMENT OF IARD (THE INTERNATIONAL ALLIANCE FOR RESPONSIBLE DRINKING)

Robust partnerships between private and public sectors and civil society are essential for improving global health and delivering sustainable change. For this reason, we work with NGOs, intergovernmental organizations (IGOs), and other interested stakeholders – including police, retailers, parents, and educators – to fight underage drinking through educational programs.

To promote partnership IARD developed a Toolkit in which the basic principles of working together are explained: "It identifies possible pitfalls and how to avoid them through a better understanding of some of the ideological, methodological, and cultural issues that may arise.

For industry members, these efforts may involve the following:

- building relationships among industry members, government bodies, community organizations, and others;
- implementing programs at local or national levels;
- encouraging and supporting initiatives where they are absent or weak;
- implementing sustainable and culturally appropriate programs;
- evaluating initiative processes, outcomes, and impact.⁷³



GLOBAL CORPORATE SOCIAL RESPONSIBILITY (CSR) CAMPAIGNS TAKE MANY FORMS

The alcohol industry producers all have CSR initiatives that they explicitly relate to the Sustainable Development Goals (SDG) of the UN in their annual and sustainability reports, particularly on poverty (SDG1), hunger (SDG2) health (SDG3), education (SDG4), water (SDG6), energy (SDG7), climate (SDG13) and partnership (SDG17).⁷⁴ Moreover, TNACs in Southeast Asia are also engaged in disaster relief and rehabilitation operations as well as anti-smuggling initiatives in countries where they operate.⁷⁵



⁷⁴ <https://www.undp.org/content/undp/en/home/sustainable-development-goals.html>

⁷⁵ Amul, G. G. H. (2019). The alcohol industry and policies on alcohol advertising, promotion and sponsorship in Southeast Asia: A preliminary review. Paper presented at the Public Health and the Global Governance of Alcohol Conference, Kettill Bruun Society Thematic Meeting, Melbourne, Australia, 30 September - 3 October

⁷³ <http://iardwebprod.azurewebsites.net/science-resources/detail/Working-Together>

Why this message is wrong

CORPORATE SOCIAL RESPONSIBILITY (CSR): PREVENTING EFFECTIVE POLICIES

The alcohol industry indicates that it makes a concrete contribution to tackling alcohol problems by carrying out its so-called Corporate Social Responsibility (CSR) information programs for young people, parents, pregnant women and drivers under the influence. The core message is that individuals have to make their own choices about responsible drinking. The strategic aim of the industry is to improve their image, declare their role as a cooperative partner, play a role in policy decisions and ultimately prevent the introduction of effective policy measures like the three best buys of the World Health Organization.⁷⁶

ALCOHOL MARKETING, CSR AND POLICY INFLUENCING ARE INCREASINGLY MERGED TOGETHER

Global alcohol corporations have sought to become trusted sources of advice for policy makers and consumers, while continuing to grow their markets. Evidence-informed public health messaging faces formidable competition from transnational corporations as the worlds of corporate and political communications, social and mainstream media become increasingly linked, presenting new opportunities for corporate actors to shape global health governance. Alcohol messaging that uses means of persuasion tied to industry agendas does not tell a clear story about commercial determinants of health, and does not contribute to health improvement. On the contrary, the basic tenets of an evidence-informed population-based approach are denied and the policy measures supported by high quality evidence are being opposed, because they are inimical to commercial interests.⁷⁷

1 IN 4 OF CSR ACTIONS HAD THE POTENTIAL FOR MARKETING AN ALCOHOL BRAND OR A PRODUCT

Evidence shows alcohol industry CSR activities are ineffective at reducing alcohol harm. In one study, more than 1046 CSR actions conducted across six global geographic regions were evaluated in terms of their estimated population reach, risk of harm and advertising potential⁷⁸. Despite claims by the Global Producers that the activities were conducted in support of the WHO Global Strategy, only 27% conformed to recommended WHO target areas for global action to reduce the harmful use of alcohol. The overwhelming majority (96.8%) of industry actions lacked scientific support and 26.5% had the potential for marketing a brand or product.

⁷⁶ Global status report on non-communicable diseases. Geneva, World Health Organization, 2010.

⁷⁷ Madden and McCambridge Globalization and Health (2021); <https://doi.org/10.1186/s12992-021-00696-2>

⁷⁸ Babor TF, Robaina K, Brown K, et al; Is the alcohol industry doing well by 'doing good'? Findings from a content analysis of the alcohol industry's actions to reduce harmful drinking; BMJ Open 2018;8:e024325. doi: 10.1136/bmjopen-2018-024325

EXAMPLES OF CORPORATE SOCIAL RESPONSIBILITY PROJECTS



Diageo's "Stop Out of Control Drinking" campaign; this Irish campaign of the Alcohol Industry emphasised that alcohol abuse is a very difficult problem, confined to young people, and falsely claimed that we don't know what works. Alcohol 'abuse' is caused by "peers", "lack of education in schools, parents, Irish culture, over many generations" and does not mention: advertising, sports sponsorship by alcohol companies.⁷⁹



"Diageo's school-based Smashed' program has been found to promote alcohol industry messages, while selectively omitting information about breast and colorectal cancer, which a feature of other alcohol industry health materials."⁸⁰

⁷⁹ Diageo's 'Stop Out of Control Drinking' Campaign in Ireland: An Analysis (Petticrew et al. 2016) <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0160379>

⁸⁰ <https://www.nzma.org.nz/journal-articles/the-practice-of-the-alcohol-industry-as-health-educator-a-critique>

EDUCATION; LOGO OF ALCOHOL PRODUCER ON SCHOOL BUILDINGS

In Nigeria and Congo, Heineken (owner of Nigerian Breweries) promoted its image to paint its logo on school buildings.⁸¹ Research suggests that industry-funded educational campaigns lead to positive views of that industry.⁸²



MIXING PRODUCT PROMOTION WITH THE WORRIES ABOUT COVID

In Lithuania alcohol industry promoted the funds paid to the National public health centre for COVID-19 pandemic control using beer brand “Kalnapilis -nonalcoholic”. This was widely disseminated as industries social responsibility effort – Kalnapilis is the main sponsor of the initiative from November, 2020. It is promoted on the National public health center Facebook page, and explains how the funds improve the capacity for contact tracing and pandemic control.



81 O. van Beemen, Heineken in Africa; Heineken in Africa; A Multinational Unleashed; Hurst, 2019.

82 Bond L, Daube M, Chikritzhs T, Access to Confidential Alcohol Industry Documents: From 'Big Tobacco' to 'Big Booze'. AMJ.2009



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