

Conclusions and outcomes of the
DEEP SEAS / FAR SEAS Thematic Capacity Building Workshop 1ⁱ
Alcohol Advertising and Sponsorship in Traditional and Digital Media

Background to the workshop

Introduction

Europe has the highest level of alcohol consumption and alcohol-related harm in the world, including alcohol-attributable cancer¹; and there is a growing awareness of the significant role that alcohol plays in the European burden of disease, premature mortality, costs of healthcare and human suffering (including cardiovascular diseases², communicable diseases^{3,4}; and mental health disorders, including depression⁵), even in moderate amounts.

Alcohol diminishes personal security, increases transmission of infectious diseases and impairs human capital, achievement and productivity⁶; and also impacts on the social environment, increasing criminality and violence.^{7,8} A recent economic study in a high income country has estimated the costs of alcohol to be higher than those of all illicit drugs combined and similar to the costs of tobacco.⁹

At the same time, spending on alcohol advertising, through a multitude of channels, both off- and online, is a major expenditure of the alcohol industry, because it promotes alcohol consumption^{10 11 12} and increases sales. Unfortunately, this promotion of alcohol products also contributes to the unnecessarily high level of alcohol-related harm and cancer in the European Union.

Workshop 1 - Alcohol Advertising and Sponsorship in Traditional and Digital Mediaⁱⁱ

The first DEEP SEAS-FAR SEAS Thematic Capacity Building Workshop brought together 127 policymakers, expert scientists and civil society actors to exchange knowledge and discuss current issues regarding the effective regulation of alcohol advertising and promotion. The long-term goal is to support EU Member States in applying European directives, developing viable policy options and implementing comprehensive action plans for regulating alcohol marketing, which promote health and reduce alcohol-related harm, including alcohol-attributable cancer.

The event comprised a series of 4 online sessions, held in December 2020, which address 4 key sub-topics relating to alcohol marketing both online and offline:

Wed 9th December Regulating traditional media – television, print, sponsorship	Mon 14th December Warning messages and consumer information to counter harm	Wed 16th December Tackling online media promotion of alcohol	Mon 21st December Regulating low-strength alcohol product marketing – closing loopholes
-----------------------------------------------------------------------------------	--------------------------------------------------------------------------------	-----------------------------------------------------------------	--------------------------------------------------------------------------------------------

ⁱ The workshop and materials were prepared under the DEEP SEAS and FAR SEAS service contracts (www.deep-seas.eu, Contract No. 20177113/ www.far-seas.eu, Contract No. 20187106) with the Consumers, Health, Agriculture and Food Executive Agency (Chafea), acting under the mandate from the European Commission (DG Santé). The information and views set out in this report are those of the author(s) and do not necessarily reflect the official opinion of the Commission/Chafea. The Commission/Chafea do not guarantee the accuracy of the data included in this study. Neither the Commission/Chafea nor any person acting on the Commission's/Chafea's behalf may be held responsible for the use which may be made of the information contained therein.




ⁱⁱ The workshop was co-hosted and supported technically by the the Department of Addictology, First Faculty of Medicine, of Charles University in Prague, and the Office of the Government of the Czech Republic.

Outcomes of the workshop

The DEEP SEAS Process: During the 4 online sessions (see the agenda of the workshop in Annex 1), panellists presented their knowledge, perspectives and experiences in the area of the session, through short videosⁱⁱⁱ and live question and answer sessions, which set the scene for discussions of key issues in policy decisions. Following small-group discussions, with a pre-assigned moderator and rapporteur, in which participants were instructed to address and reach a level of consensus on a concrete policy-oriented question, responses and points for further consideration were reported back to the whole workshop group and discussed further to arrive at conclusions, points for consideration and suggestions on the next steps to regulate alcohol advertising in Europe.

The main take-home messages raised and supported by participants over the four sessions are summarized in *Figure 1* below. A more detailed account of the presentations and discussions is given in the next section.

Figure 1. Main outcomes of workshop sessions

-  The cheapest and most effective regulation to reduce the harm caused by alcohol marketing is a **total ban on advertising** in all media, as is seen for other cancer-causing products such as tobacco
-  **Self-regulation is not effective** in reducing alcohol marketing exposure, in general or to children and other at-risk groups
-  **Consumers have the right to know** about the harms and risks of alcohol products through labelling and information campaigns,
-  Consumers also have the **right to know when they are being subjected to covert advertising online** or off (e.g., through sponsorship of influencers)
-  We should not only **learn from, but also support trail-blazing countries** in alcohol marketing regulation (*such as France on general media regulations, Finland and Lithuania on digital marketing, Ireland and Canada on labelling, and Norway on non-alcoholic product regulation*)
-  Formulating policy as a **positive stipulation of what *is* allowed** is more effective than a growing list of prohibitions which fail to address rapidly evolving online media or weakly enforced age-limits
-  **Cooperation** with international agencies (e.g.WHO, OECD) and with the technology giants (GAFA or other emerging companies) is key to tackling online media regulation
-  Policy needs to prevent the promotion of **low- and zero-alcohol products** to underage groups or using the same brand identity as alcoholic beverages

ⁱⁱⁱ The videos can be seen on the workshop web-page, here: <https://www.deep-seas.eu/capacity-building/thematic-workshop-1-alcohol-advertising-and-sponsorship/>

Presentations and discussions

Each of the 4 sessions of the workshop comprised 3 presentation slots – an introduction, evidence brief and stakeholder perspectives – followed by a discussion in small groups to tackle a specific policy question. Here we give an account of the presentations and feedbacks from the discussions, session by session.

Session 1 – Wednesday 9th December 2020 – Regulating traditional media – TV, print & sponsorship

- Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts
 - **Alena Šteflová**, the Deputy Health Minister of the Czech Republic, welcomed all to the meeting on behalf of the Czech hosts and highlighted the importance of tackling alcohol-related harm and regulating marketing in the Czech Republic.
 - **John F Ryan**, Director of the Public Health, country knowledge, crisis management directorate, DG SANTE of the European Commission, welcomed participants and highlighted links between the topic of traditional marketing of alcohol and the EU Beating Cancer Plan.
 - **Sofia Karttunen**, Policy officer at the European Commission in the Audio-visual & Media Services Policy Unit, DG CONNECT, explained the rationale behind the recently revised Audio-Visual Media Services Directive (AVMSD), and specific issues for alcohol marketing in traditional media, including the scope of regulations governing self-regulation, sponsorship, and protection of minors.
 - **Ana Sarasa**, scientific officer at the Joint Research Center (JRC) of the European Commission, presented the newly developed and launched Marketing Codes of Conduct Toolkit, a checklist of policy considerations, which aims to facilitate the development of statutory regulation, co-regulation or self-regulatory codes of conduct by European regulators, regarding the marketing of alcohol, as well as different food products.

- Evidence updates - Key messages from science on regulation of alcohol advertising in traditional media –
 - **Wim van Dalen**, Director of the Dutch Institute for Alcohol Policy (STAP) and President of the European Centre for Monitoring Alcohol Marketing (EUCAM), stressed that there is more than enough scientific evidence that alcohol advertising leads to increased risky drinking and alcohol-related harm, as well as strong evidence for the ineffectiveness of self-regulation of advertising by the alcohol industry (both in terms of compliance and resulting exposure of minors to adverts). He proposed a ban of marketing as the only really effective limiter of harm. Mr van Dalen also introduced the new ALHAMBRA study on online marketing, which will bring together knowledge of existing regulation and its effectiveness and look at the transposition of the revised AVMSD in digital marketing.
 - **Gerard Hastings**, Professor Emeritus at Stirling University in Scotland and founder of the Institute for Social Marketing and the Centre for Tobacco Control Research, drew insightful lessons from decades of policy development to curb tobacco-related harm. He warned against focusing scarce resources on tackling a particular form of advertising, because of the highly innovative nature of the marketing industry; highlighted the problems of weak regulation over sponsorship and self-regulation; and laid out hopeful or dystopian scenarios for future policy development depending on policy approaches taken now.

- Country/EU multi-stakeholder experiences –
 - **France** – *Loi Evin control and the changing marketing scene* – **Karine Gallopel-Morvan**, Professor of Social Marketing at the School of Public Health (EHESP) in France, gave an overview of the development of the *Evin Law* governing alcohol and tobacco marketing, stressing the importance of clearly defining which actions are allowed, rather than those which are not. Dr Gallopel also pointed out subsequent weakening of the French law through lobbying and lessons from that.
 - **Estonia** – *Advertising regulations for alcohol* – **Triinu Täht**, Advisor to the Estonian Public Health Department, summarised the policy regulating alcohol marketing in Estonia, which learnt from the success of the *Loi Evin* and also prohibits the inclusion of living creatures or characters in alcohol

advertising. She highlighted the different priorities and interests held by various stakeholders and the importance of a clearly thought-out media strategy.

- **FYFA Project** (EU) – *Findings from the FYFA Project (Focus on Youth, Football and Alcohol)* – **Emanuele Scafato**, Director of Population’s Health and Health Determinants Unit in the National Centre for Epidemiology, Surveillance and Health Promotion at the Istituto Superiore di Sanità, Italy, presented the EC-funded FYFA project and key findings for policy. The project found very limited control or attempts at regulation of alcohol sponsorship and marketing through sports clubs, including those for children, and identified the key target audiences for preventive initiatives; and highlighted the considerable work still to be done in this area.

Breakout discussions tackled the question: How can Member States be supported to ban alcohol advertising to protect young people, given that self-regulation has been found ineffective? (groups were asked to come to agreement on at least 3 top priorities)

The following points were made by the group rapporteurs and moderators in the feedback and wrap-up sessions:

- It is important that **countries develop ‘in-house’ knowledge** and strengthen their national evidence base (e.g., on transgressions of regulations and the impact of advertising on harm) to create robust political arguments. But the speed and timeliness of outputs by national research groups is key to success (without excessive delays).
- **Collaborations of alcohol policy actors with diverse stakeholder groups** with synergistic interests are needed to compete with the very well-funded ‘voice’ of the alcohol lobby – including linking with local researchers, civil society organisations and patient interest groups in areas such as recovery, violence prevention and infectious disease control.
- It is **time to broaden the focus of alcohol advertising research and policy beyond ‘protecting children’** and to recognise the continuous nature of life spans, intergenerational influences and lasting harm.
- Alcohol marketing regulations need to be part of a **comprehensive approach** to improve population health (linked with initiatives on pricing and availability); while also using **multiple targeted campaigns** to avoid indifference at bland messaging.
- Legislation governing alcohol marketing, if not positively defined, should be carefully worded at both the national and EU levels to avoid loopholes – for example, removing the word “specific” in prohibiting marketing ‘specifically aimed at young people’.
- National and international knowledge gaps highlight a need for **instruments to accurately monitor industry activity across different media**, and collaboration between international institutions.
- Next steps in empowering Member States to make public health progress could be a **handbook on lessons learned by Member States**, bringing together practical and experiential knowledge; and, simultaneously, **pressure from Member States to prioritise alcohol via the EC SGPP** (Steering Group on Prevention and Promotion) and focus funding mechanisms on these issues.

Session 2 – Monday 14th December – Warning messages and consumer information to counter harm

- Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts
- **Jarmila Vedralová**, the National Drug Policy Coordinator for the Czech Republic, welcomed participants to the second session of the workshop and highlighted the importance of the topic in the hosting Member State, and the recent example of a Czech public campaign to raise awareness of the dangers of drinking in pregnancy or for children.
- **John F Ryan**, Director of the Public Health, country knowledge, crisis management directorate, DG SANTE of the European Commission, welcomed participants and mentioned the relevance of the topic of warning messages and consumer information to the EU Beating Cancer Plan.
- **Sofia Karttunen**, Policy officer at the Commission in the Audio-visual & Media Services Policy Unit, DG CONNECT, explained that the AVMSD does not include any requirement related to health messages or

consumer information on alcohol, but that Member States are free to include such requirements in regulations so long as they are considered ‘proportional and non-discriminatory’.

- **Ana Sarasa**, scientific officer at the Joint Research Centre (JRC) of the EC, highlighted that health messages were considered an important part of the development of the JRC Marketing Codes of Conduct Toolkit, and that a good practice example given in the Toolkit is the Irish Public Health (Alcohol) Bill, which foresees the inclusion of 3 essential messages in warnings: dangers of alcohol consumption, risks when pregnant, and links to fatal cancers.
- Evidence updates - Key messages from science on regulation of alcohol advertising in traditional media –
 - **Eva Jané-Llopis**, Director of Health and SDGs at ESADE Business School in Barcelona and Senior Associate Professor at the School of Public Health, Maastricht University, gave an overview of the evidence coming out in the recent WHO Health Evidence Network (HEN) report on existing practice and barriers and facilitators to development and implementation of alcohol labelling policy. This clearly indicated effectiveness of labels which include 1) ingredients, 2) nutritional / calorific values, and 3) health information or warning messages. She presented data showing that existing legislation in the EU is very limited, especially on calorific values and general health information; and highlighted recent research from Canada (Pechey et al. 2020¹³), which found that the most effective labelling uses pictograms and clear messages. Dr Jané-Llopis also presented the forthcoming ALHAMBRA work in this area, which will bridge some of the research gaps by providing an evidence-based library of effective messages and labels, rank communication objectives based on the burden of harm and provide model message proposals for policy makers to use.
 - **Mariann Skar**, General Secretary for Eurocare (the European Alcohol Policy Alliance) gave an account of the past, present and ongoing work of the organisation in the AVMSD and currently the Digital Services Act, including efforts to strengthen marketing regulation (e.g., on sponsorship, regulating content and reducing exposure) at the EU and national levels. **Sandra Tricas-Sauras**, Head of Research for Eurocare, highlighted the main points that policy makers should bear in mind regarding warning messages to protect population health; specifically, she highlighted that consumers demand this information and have a right to know what is in the products they consume, and recent progress on the national level (less on the European level). She also warned that voluntary commitments have so far been completely inadequate in increasing the number of health messages on alcohol beverages. Mariann Skar also stressed the importance of framing the policy options positively – as health promotion information (demanded by consumers) rather than warning messages (easier to reject by consumers).
- Country/EU multi-stakeholder experiences –
 - **Ireland** - *New regulations and health information in alcohol adverts* – **Eunan McKinney**, head of Communications and Advocacy at Alcohol Action Ireland (AAI), gave an overview of the Irish approach and Public Health and Alcohol Act of 2018 as it related to warning messages (3 elements as mentioned above) and other aspects of alcohol advertising. He highlighted the persistent obstructive tactics that alcohol industry lobbyists have used to delay the act from taking effect, as well as the delays that will likely occur through the EU scrutiny process. He also explained the civil society role in counter-lobbying to see the regulations through.
 - **Czech Republic** – *Tackling alcohol harm and the SAFER project* – **Miroslav Bárta**k, Head of the Centre for Alcohol-Related Harm at the Charles University in Prague, explained that the Czech regulation applies to all types of media and 1) cannot encourage abusive use, 2) negatively or ironically assess abstainers, or 3) be directed at under 18s. However, labelling and messaging is essentially left to the industry, without health sector influence. He also outlined the Czech work under the WHO SAFER initiative^{iv}, which has made the most progress in the area of alcohol advertising.

^{iv} SAFER - A world free from alcohol related harms https://www.who.int/substance_abuse/safer/msb_safer_brochure.pdf

- **Slovenia** – *The “VeščajPiješ?” mobile app and health messages* – **Sandra Rados-Krnel**, Head of Research and Project Management at National Institute of Public Health in Slovenia, gave an overview of the Slovenian regulations, and presented a different approach to health promotion messages – a mobile app (*“Do you know what you drink?”*) which allows users to scan product bar codes and receive consumer information and health messages. The app builds an alcohol module onto a successful app giving food information, responding to a high demand for nutritional information on beverages; and uses this as an opportunity to promote healthier lifestyles and increase consumer awareness.

Breakout discussions tackled the question: How can we gather support for accurate and effective warning messages across different governmental sectors? Should messages be tailored to MS?

The following points were made by the group rapporteurs and moderators in the feedback and wrap-up sessions:

- A **coherent set of messages** across the board is more important than tailoring, which runs the risk of watering down the impact of warning messages or health information.
- The issue of providing nutritional, calorific and health information must be re-framed as **consumers’ right to know** what they are buying and imbibing. This is a cause that all governmental sectors have to support and is also in line with other pro-carcinogenic products.
- **Cancer warnings are the primary sticking point** and received the most resistance from the alcohol industry, who have delayed this legislation (e.g., in Ireland) largely through small practical arguments (costs of re-printing, space on the label etc.)
- In general, the industry is not able to be impartial or health-focused on this point. Therefore, **industry actors have no valid role in designing the content or regulations on health information**, or in enforcing their use.
- Public health actors need to join forces and use the EU Cancer Plan and similar initiatives to support those countries who are leading in developing stronger health information regulation on alcohol, and maintain international pressure to push this legislation into becoming mainstream.
- Greater support is also needed from European and international organisations.

Session 3 – Wednesday 16th December – Tackling online media promotion of alcohol

- Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts
 - **John F Ryan**, Director of the Public Health, country knowledge, crisis management directorate, in DG SANTE, talked about the EU Beating Cancer Plan. He mentioned specific challenge and additional risk posed by online alcohol marketing in combination with the lockdowns due to the coronavirus; and how this, along with other determinants such as lack of activity, were of relevance as determinants of cancer.
 - **Sofia Karttunen**, Policy officer at the Commission in the Audio-visual & Media Services Policy Unit, DG CONNECT, explained that the revised AVMSD requires Member States to adapt existing regulation to take into account digital media, and provide reporting mechanisms for non-compliance with regulations. The Digital Service Act (DSA) will further codify procedures for notifying on illegal content and provide a clear legal framework for regulation.
 - **Ana Sarasa**, scientific officer at the Joint Research Centre (JRC) of the EC, mentioned that the JRC codes of conduct toolkit recognises the power of influence from digital marketing and the ethical imperative to protect children and other groups. The toolkit includes points on cross-border marketing, new communication channels, age-verification aspects, monitoring of digital marketing, influencer marketing and content tagging.
 - **Michal Miovský**, Professor of clinical psychology and vice-Dean at the Charles University in Prague talked about how research could better support policy in this area, and the need for continued investment in capacity into new issues such as neuromarketing and digital innovations. He also highlighted the importance of tapping into the resource of academic doctoral students to bridge the gap between

research and practice, foster intergenerational collaboration to exchange different strengths, and keep policy up-to-date.

- Evidence updates - Impact and regulation of online marketing –
 - **Nathan Critchlow**, Researcher and SSA Academic Fellow at the Institute for Social Marketing and Health, University of Stirling in Scotland, gave a comprehensive account of the different forms and mechanisms used in online marketing of alcohol, explaining the categories of paid-for media, owned media, earned media, and, the more ambiguous ‘native media’ (which is not immediately apparent as marketing). He ran through the most recent evidence which strongly demonstrates the impact of online advertising on drinking behaviour; and highlighted two very compelling studies. Dr Critchlow gave an outline of the 8 main challenges faced by policy makers in this area, and knowledge gaps for future policy research. He stressed the potential game changer of gaining collaboration from the big technology companies, which have so far been found to join the conversation only when a bold policy move is made, such as an outright ban and sanctions for online marketing.
 - **Hanneke Hendriks**, Assistant Professor at the Amsterdam School of Communication Research, provided valuable insight into new evidence in the field of social media and networking sites (SNS) on the mechanisms used to market alcohol through these online channels, the impact on consumers (especially young people) and the modifying effect of sponsorship disclosures (e.g., #ad - which lowers the promotional impact). She highlighted key policy challenges being the enforcement of sponsorship disclosure regulations, the problems of unreliable age-verification, and

- Country/EU multi-stakeholder experiences –
 - **Finland** – *Pioneering policy and development of social media regulations* – **Emmi Kauppila**, Researcher in online alcohol marketing at University of Helsinki in Finland, outlined the development of the Finnish approach to online alcohol regulation in brought in in 2008, which also addresses social media marketing. She also drew important messages from the report she authored on a comparative study on the impact of legislative change on alcohol marketing on social media sites in Finland and Sweden. Dr Kauppila highlighted up two key points at which legislation can fall down: loopholes and enforcement.
 - **Lithuania** – *Regulating online alcohol marketing - implementing a ban* – **Nijole Gostautaitė Midttun**, President of the Lithuanian Tobacco and Alcohol Control Coalition (NTAKK) and Director of Mental Health Initiative in Lithuania, explained the clear and simple approach of a complete ban on alcohol advertising which has been adopted in Lithuania in 2008; and drew attention to the main obstacle to taking such action – lack of political will. She explained how civil society organisations can be instrumental in supporting political actors in moving such legislation forward.
 - **Czech Republic** – *Regulation of digital alcohol promotions from the marketing perspective* – **Denisa Hejlová**, Head of the department of Marketing Communication and PR at the Charles University in Prague, described the current and historical culture surrounding alcohol promotion in the Czech Republic, and gave us insight into how health and marketing sectors can collaborate to regulate online advertising or *persuasive communication* (in all its forms – including covert advertising). She presented a grassroots ethical initiative (#fěr_fluencer) established by Czech communication to encourage ethical practice such as disclosure of sponsorship or payment on social media and not promoting alcohol and tobacco.

Breakout discussions tackled the question: Which are the key policy tools needed to overcome challenges in regulating online alcohol marketing? How can member states support each other in this?

The following points were made by the group rapporteurs and moderators in the feedback and wrap-up sessions:

- The global nature of the internet means that we can make points on the supra-national level, and that sharing information and knowledge between countries towards **international consensus, support and recommendations** is essential.
- **Digital reach represents an ethical and political problem** of which there is growing recognition also outside the alcohol field, with a change in the political climate through such recent news items as the Cambridge Analytica scandal.
- The alcohol public health field needs to **join forces with other areas and products**, such as junk food – the WHO CLICK monitoring tool is one example of this.^v
- A perfect solution should not be the enemy of the good – Member States are advised to **aim for a complete ban of all alcohol advertising (including online)**, as the most cost-effective and clear policy option, and be prepared to concede certain points to reach a workable solution whilst moving in a good direction (bearing in mind the principle of positive stipulation rather than prohibition).
- The threat of a ban may also **incentivise larger tech companies** and bring into the conversation.
- Although there is a need to focus research on harms to adults as well as children, **young peoples' voices have a vulnerability and power of persuasion** that is important to harness in making political arguments – qualitative studies can bring these to the fore.
- One possible step in the right direction is to legislate for a system of **opting in for alcohol content**, although this is not a perfect solution given the weak point of age verification.
- Stronger EU regulation than the AVMSD and DSA could also provide better support to Member States.

Session 4 – Mon 21st December – Regulating low-strength alcohol product marketing – closing loopholes

- Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts
 - **Hana Horka**, Policy Officer at the European Commission, department for health determinants and international relations, gave a short live address highlighting the next steps towards the adoption of the EU Cancer Plan in February 2021. She noted that as alcohol is an important determinant of cancer burden, and there is no lower limit for the cancer risk posed by alcohol, the topic of how to regulate the promotion of low- and zero-alcohol products is also of high relevance to the strand dealing with lifestyle prevention of cancer.
 - **Jürgen Rehm**, Executive Director of the Institute for Mental Health Policy Research and Senior Scientist in the Campbell Family Mental Health Research Institute in Toronto (CAMH), Canada, gave an overview of research findings on alcohol as a cause of cancer. The international Agency for Research on Cancer has stated that there is the strongest possible evidence that alcohol is carcinogenic to humans. Dr Rehm advised policy makers to take a long-term view to see the positive impact of alcohol regulation on population cancer rates (10+ years); He pointed out that there is no lower threshold at which alcohol does not cause cancer, and so policy should always aim to reduce consumption, even among moderate drinkers. Finally, he pointed to the ample evidence for the effectiveness of the WHO 3 best buys: increasing relative price of alcohol, reducing availability, and banning advertising.
 - **Sofia Karttunen**, Policy officer at the Commission in the Audio-visual & Media Services Policy Unit, DG CONNECT, pointed out that the AVMSD regulations governed all alcohol products equally – including low-alcohol products. For non-alcoholic products (as with all alcohol), the general rules apply: advertising must be readily recognisable, not use subliminal techniques, encourage behaviour which endangers health or safety, respect human dignity.

^v <https://www.euro.who.int/en/health-topics/disease-prevention/nutrition/publications/2019/monitoring-and-restricting-digital-marketing-of-unhealthy-products-to-children-and-adolescents-2019>

- **Ana Sarasa**, scientific officer at the Joint Research Centre (JRC) of the EC, explained that the JRC toolkit on codes of conduct outlines different policy options for marketing different strength alcohol products, including considering the marketing of non-alcoholic versions of alcohol products as brand marketing. One suggestion from the workshop was to apply nutritional and compositional criteria to the whole market portfolio of a brand.

- Evidence updates - Impact and regulation of online marketing –
 - **Peter Anderson**, Professor on Substance Use Policy at the University of Newcastle and the University of Maastricht, presented evidence of health gains with policy which encourages drinkers to switch to lower-strength and non-alcoholic products. This is principally effective when the switch involves re-formulation of existing alcohol products (lowering the alcohol strength of beer or wine, for example), rather than developing and promoting new low- or zero-alcohol products. The most promising policy to incentivise re-formulation by the alcohol industry is minimum unit pricing or finely-tuned taxation. Dr Anderson also presented forthcoming work under the ALHAMBRA service contract, which will review all the evidence for lowering alcohol content on reducing alcohol harm and examine policy levers to support re-formulation by producers and lower levels of use by consumers.
 - **Carmen Voogt**, Senior Researcher at Radboud University Nijmegen, spoke about the risks of low-alcohol marketing and how to protect young people from gateway products. She pointed out that the field of research looking at the impact of low- and zero-alcohol (nolo-) marketing on behaviour was scanty, to date, and more was needed; but that one study found increased brand recognition and awareness of alcohol brands. Dr Voogt highlighted the potential risks: That nolo-alcohol products act as a gateway to earlier and riskier alcohol consumption; these products contribute to the normalisation and ubiquity of alcohol brands; brand awareness among children; difficulty enforcing legislation distinguishing non- and alcohol products.

- Country/EU multi-stakeholder experiences –
 - **Norway** – *Norwegian approaches to regulating advertising of alcohol, low-alcohol and non-alcohol products* – **Hanne Cecilie Widnes**, Secretary-General of IOGT, Norway, described the long-standing Norwegian Alcohol Act (since 1975), which prohibits promotion of alcoholic beverages, as well as the promotion of other products under alcohol brands and to include alcohol in the promotion of other goods or services. She gave graphic examples of the regulation in practice, and explained that the rules are media neutral (applying to online and traditional media). She mentioned challenges to the legislation, generally from illegal or unavoidable cross-border exposure to marketing or sponsorship, and stressed the importance of first-time fines as a means to tackle this. An IOGT survey found a large majority of the population support the marketing ban, which can be persuasive to policy makers and large image-conscious brands.
 - **EPHA** - *Insights from the European Public Health Alliance (EPHA) on protecting young people from unhealthy influence* – **Nikolai Pushkarev**, Policy Coordinator at the European Public Health Alliance (EPHA), gave an overview of the alliance work at the EU and national levels, and called for greater clarity and common vision of the aims and division of responsibility in this area. He raised 4 points to be addressed in relation to nolo- products: 1) focus on reducing *exposure* to marketing rather than marketing targeted at children; 2) recognise that ‘childhood’ goes right up to 18 years of age; 3) Self-regulation by companies is ineffective and only works to promote the companies further; 4) A step back allows us to see the underlying perversity of the situation with health-harming products pushed on young people.

Breakout discussions tackled the question: Which are the key policy tools needed to overcome challenges in regulating online alcohol marketing? How can member states support each other in this?

The following points were made by the group rapporteurs and moderators in the feedback and wrap-up sessions:

- **Minimum Unit Pricing (MUP)** (or as a minimum a general taxation rule applied to all alcohol products) emerged from most groups as an essential way forward, providing a robust floor for policy to reduce harm and encourage positive behaviour change (by populations and companies).
- It was noted that the **taste or very low alcohol content can act as a trigger** for those in recovery, making these products a contributor to relapse in alcohol use disorders.
- However, those **consumers with no previous problems cannot distinguish lower amounts of alcohol** (reformulated drinks), and therefore unannounced downward changes can bring substantial population health benefits.
- As well as branding distinctions, **points of sales initiatives separating alcohol, low- and non-alcohol** products can be a part of legislation.
- Raising and maintaining awareness of the **high sugar content in nolo- products** is also important – among general population and policy makers – if we do not want to substitute one public health crisis for another one.
- **Further research into the mechanisms and impact of nolo- marketing** on drinking outcomes could be useful to clarify the extent to which nolo- products are gateways to drinking, but waiting for it should not be a barrier to preventive action.
- Some countries (e.g., Poland) reported an increase in non-alcoholic beer sales during the COVID pandemic lockdown.
- It was also noted that definitions of non-alcoholic beverages vary between Member States, with some including anything up to 0.1% ABV in this category. Clearer cross-country definitions would be helpful.
- **Supermarket chains and other large suppliers** also have an important role to play, and one policy option is to regulate purchasing requirements.

References

- 1 Rehm, J., K. D. Shield, and E. Weiderpass.(2020): Alcohol consumption: a leading risk factor for cancer. *World Cancer Report: Cancer Research for Cancer Prevention*. Lyon: International Agency for Research on Cancer (2020): 68-76.
- 2 Millwood IY, Walters RG, Mei XW, Guo Y, Yang L, Bian Z et al. Conventional and genetic evidence on alcohol and vascular disease aetiology: a prospective study of 500 000 men and women in China. *Lancet*. 2019;393(10183):1831–42. doi: 10.1016/S0140-6736(18)31772-0
- 3 Imtiaz S, Shield KD, Roerecke M, Samokhvalov AV, Lönnroth K, Rehm J. Alcohol consumption as a risk factor for tuberculosis: meta-analyses and burden of disease. *Eur Respir J*. 2017;50(1):pii:1700216. doi: 10.1183/13993003.00216-2017.
- 4 Rehm J, Probst C, Shield KD, Shuper PA. Does alcohol use have a causal effect on HIV incidence and disease progression? A review of the literature and a modeling strategy for quantifying the effect. *Popul Health Metr*. 2017;15(1):4. doi: 10.1186/s12963-017-0121-9.
- 5 Boden JM, Fergusson DM. (2011) Alcohol and depression. *Addiction*. 2011;106(5):906–14. doi: 10.1111/j.1360-0443.2010.03351.x.
- 6 Griswold MG, Fullman N, Hawley C, Arian N, Zimsen SRM, Tymeson HD et al. (2016) Alcohol use and burden for 195 countries and territories, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016. *Lancet*. 2018;392(10152):1015–35. doi: 10.1016/S0140-6736(18)31310-2.
- 7 Donnelly PD, Ward CL. Interpersonal violence: a global health priority. *Oxford Textb Violence Prev Epidemiol Evidence, Policy*. 2015;1.
- 8 Brown W, Leonard KE. Does Alcohol Cause Violence and Aggression? (2017) *Wiley Handb Violence Aggress*. 2017;1–13.
- 9 Canadian Substance Use Costs and Harms Scientific Working Group. *Canadian substance use costs and harms (2007–2014)*. Ottawa, Ontario: Canadian Centre on Substance Use and Addiction; 2018.
- 10 Anderson P, A de Bruijn, K. Angus, R. Gordon, R. Hastings (2009). Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol Alcohol*. 44: 229-43
- 11 Jernigan, D., J. Noel, J. Landon, N. Thornton and T. Lobstein; (2017) Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. *Addiction*, 2017, 112 (Suppl. 1), 7-20
- 12 Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.
- 13 Pechey, E., Clarke, N., Mantzari, E., Blackwell, A. K., De-Loyde, K., Morris, R. W., ... & Hollands, G. J. (2020). Image-and-text health warning labels on alcohol and food: potential effectiveness and acceptability. *BMC public health*, 20, 1-14. <https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-020-8403-8>