

Conclusions and outcomes of the  
DEEP SEAS Thematic Capacity Building Workshop 1<sup>i</sup>  
*Alcohol Advertising and Sponsorship*



*DEEP SEAS Topic: Traditional Alcohol Advertising and Sponsorship*

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## Executive Summary

Europe has the highest level of alcohol consumption and alcohol-related harm in the world, including alcohol-attributable cancer. Alcohol diminishes personal security, increases transmission of infectious diseases and impairs human capital, achievement and productivity; and also impacts on the social environment. Unfortunately, the promotion of alcohol consumption through widespread marketing, advertising and sponsorship, both off- and online, also contributes to the unnecessarily high level of alcohol-related harm and cancer in the European Union, and requires more effective regulation.

The first DEEP SEAS Thematic Capacity Building Workshop brought together 127 policymakers, expert scientists and civil society actors online, to exchange knowledge and discuss current issues regarding the effective regulation of alcohol advertising and promotion.

This report describes the event, gives an introduction to the topic and presents the main outcomes and conclusions arising from the workshop, as well as a detailed account of the presentations and discussions in each session.

## Résumé

L'Europe a le niveau le plus élevé de consommation d'alcool et de dommages liés à l'alcool dans le monde, y compris le cancer attribuable à l'alcool. L'alcool diminue la sécurité personnelle, augmente la transmission des maladies infectieuses et nuit au capital humain, aux réalisations et à la productivité, et a également des répercussions sur l'environnement social. Malheureusement, la promotion de la consommation d'alcool par le biais d'un marketing, d'une publicité et d'un parrainage à grande échelle, en dehors et en ligne, contribue également au niveau inutilement élevé des dommages liés à l'alcool et du cancer dans l'Union européenne, et nécessite une réglementation plus efficace.

Le premier atelier thématique sur le renforcement des capacités pour les EES profondes a réuni 127 décideurs, experts scientifiques et acteurs de la société civile en ligne, pour échanger des connaissances et discuter des questions actuelles concernant la réglementation efficace de la publicité et de la promotion de l'alcool.

Ce rapport décrit l'événement, présente une introduction au sujet et présente les principaux résultats et conclusions de l'atelier, ainsi qu'un compte rendu détaillé des présentations et des discussions de chaque session.

## Background to the workshop

### Introduction

Europe has the highest level of alcohol consumption and alcohol-related harm in the world, including alcohol-attributable cancer<sup>1</sup>; 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 diseases<sup>2</sup>, communicable diseases<sup>3,4</sup>; and mental health disorders, including depression<sup>5</sup>), even in moderate amounts.

Alcohol diminishes personal security, increases transmission of infectious diseases and impairs human capital, achievement and productivity<sup>6</sup>; and also impacts on the social environment, increasing criminality and violence.<sup>7,8</sup> 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.<sup>9</sup>

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<sup>10 11 12</sup> 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<sup>ii</sup>

The first DEEP SEAS-FAR SEAS Thematic Capacity Building Workshop brought together 127 policymakers, expert scientists and civil society actors<sup>iii</sup> 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. Session 1 was devoted exclusively to the DEEP SEAS topic, while sessions 2 and 4 covered transversal topics relevant to all marketing and sponsorship policy issues (relating to alcohol marketing both online and offline):

Session 1	Session 2	Session 3	Session 4
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

### Introduction and background on the DEEP SEAS topics of the workshop sessions

Decades of scientific evidence indicate that increased exposure to alcohol marketing across all types of media increases consumption of alcohol, leading to higher levels of alcohol related harm (ARH).

Until around 2008, regulations on **traditional alcohol advertising** in the European Union were primarily aimed at limiting alcohol advertising through media such as television, billboards, in films, etc. Most of these regulations were relatively effective; although there were and still are weak points such as the regulation of alcohol brand sponsorship of cultural and sports events.

The regulation that the European Union has laid down in its legislation with regard to alcohol marketing is part of broader European legislation in the field of communication, which was formerly the regulation ‘Television without Frontiers’. The Audio-Visual Media Services Directive (AVMSD), first brought into force in 2010, governs EU-wide

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<sup>ii</sup> 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.

<sup>iii</sup> For a breakdown of participants by session, profile and geographical background, please see Annex 3.

coordination of national legislation on all audio-visual media, both traditional TV broadcasts and on-demand services. Formally, this European regulation has been designed in such a way that it leads to a minimal level of harmonization of the regulations of member states with the aim, inter alia, that cross-border transmissions would not contravene national regulations. Toolkits and guidance have been developed by the EC JRC, WHO and Nordic Council, to support Member States with a range of policy landscapes in implementing more effective regulation on alcohol advertising, to reduce alcohol-related harm.

Self-regulation by the alcohol industry and affiliated bodies is mainly concerned with the content and channels of alcohol adverts, and has been widely found in scientific studies to be ineffective in reducing drinking, ARH or underage drinking. Similarly, co-regulation, combining statutory regulation and self-regulation, has not been found to be effective in limiting exposure of children to adverts, curbing underage drinking or reducing ARH.

Wine currently holds a special status in some EU countries with regards to promotion and advertising (in particular wine producing countries), despite evidence that alcohol in all forms is linked to health harms and without net positive effect. This special status therefore needs to be re-examined and brought in line with health priorities.

One policy option, drawing on the regulation of other cancer-causing agents, is to mandate clear consumer information to counter harms in the form of **labelling and health promotion messages** on alcohol products and/or to accompany alcohol marketing and advertising.

Widespread warning messages accompanying alcohol information, if carefully developed and displayed on rotation to avoid habituation, are a valid policy regulatory tool, which could raise public health awareness and alcohol health literacy and result in societal and industry behaviour change and improved population health.

**Low- and non-alcohol products** have been undergoing a boom in popularity, production and investment in marketing, being promoted to tap into the growing health and well-being market. There is some compelling evidence that encouraging drinkers to switch to lower alcohol products could result in broad societal public health gains.<sup>13,14</sup> Specifically, *unpublicised reformulation* to lower the alcohol content of existing products shows more promising results than offering new low- or non-alcohol products, always bearing in mind that there is no lower threshold for the cancer risk of alcohol (the only safe amount to completely avoid alcohol attributable cancer is zero).

However, particularly regarding non-alcoholic products, regulation presents challenges in terms of a) dissociating brand visual identity for alcohol and low-/non-alcohol products; b) prohibiting promotion to minors, to prevent 'gateway' use; and, c) avoiding the normalisation and ubiquity of alcohol brand products in settings or situations that could lead to problematic drinking (e.g., during pregnancy, driving, during sports)

The key messages fed into the workshop via the background document, which was available to all participants in advance of the sessions, can be seen in Annex 1.

## 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 videos<sup>iv</sup> 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.

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<sup>iv</sup> 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/>

Figure 1. Main outcomes of all workshop sessions



## 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, relevant to the DEEP SEAS topic of *Traditional Alcohol Advertising and Sponsorship* (Sessions 1, 2 and 4).

### 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. 2020<sup>15</sup>), 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 Bártak, 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<sup>v</sup>, which has made the most progress in the area of alcohol advertising.
  - **Slovenia** – *The “VešKajPiješ?” 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.)

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<sup>v</sup> SAFER - A world free from alcohol related harms [https://www.who.int/substance\\_abuse/safer/msb\\_safer\\_brochure.pdf](https://www.who.int/substance_abuse/safer/msb_safer_brochure.pdf)

- 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

(This session is dealt with in the FAR SEAS workshop 1 report.)

### 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.
  - **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.

## Evaluation of the workshop

Each session of the workshop was evaluated voluntarily by the participants, with the online evaluation survey provided in the session and immediately afterwards in a follow-up email. The brief survey was designed to be quick and easy and disclosure of identity was optional (no respondents did so – all answered anonymously). Participants were asked to give 4 quantitative scores to the session they had attended:

- Overall evaluation (1→10)
- The topics and aspects covered by the speakers were relevant for the overarching theme of the session (1→5)
- I learned actionable information for my work and/or consolidated my understanding/ knowledge. (1→5)
- There was enough time and opportunities allocated for interaction with the speakers and between participants. (1→5)

Participants were also invited to feedback in free text questions asking about:

- Which speakers of the session did you find the most interesting/informative/engaging?
- Please list the names of the speakers or the topics they talked about. Did you find any topic missing which you would like to see covered in relation to this session's theme?
- Do you have any comments or suggestions you would like to share?

A total of 105 responses were received overall (across all 4 sessions), with response rate tapering off slightly as can be expected with those attending more than one session possibly omitting to repeat the survey. The scores were analysed as an average of all responses, with only one outlier being removed for analysis (the lowest possible score awarded clearly not fitting with the very positive comments given on the session).

The quantitative score results can be seen in Annex 4. Over the course of the four sessions, the interaction score increased, which we hope was the result of technical adjustments made throughout the series of sessions to promote interaction in the breakout, feedback and wrap-up sessions.

The qualitative feedback is not detailed to protect anonymity, but the comments given are mostly positive and all useful to inform the development of future workshops in the series.

## Annexes

### Annex 1: Key messages from the background documents & executive summary

#### Key messages on the regulation of alcohol marketing and advertising (both traditional and digital media)

The scientific briefing documents highlight a number of key messages which are relevant to the regulation of alcohol advertising through any media channel:

- Decades of scientific evidence indicate that **increased exposure to alcohol marketing across all types of media increases consumption of alcohol, leading to higher levels of alcohol related harm (ARH)**.
- **Alcohol advertising regulations are extremely variable in the EU**, although underpinned by the minimum requirements of the Audio-Visual Media Services Directive (AVMSD).
- **Self-regulation** by the alcohol industry and affiliated bodies is mainly concerned with the content and channels of alcohol adverts, and **has been widely found in scientific studies to be ineffective** in reducing drinking, alcohol-related harm (ARH) or underage drinking. Similarly, co-regulation, combining statutory regulation and self-regulation, has not been found to be effective in limiting exposure of children to adverts, curbing underage drinking or reducing ARH.
- When properly enforced, **alcohol marketing restrictions are a cost-effective strategy for reducing alcohol-related harm (ARH)**, and for this reason banning alcohol advertising is one of the WHO 'best buys' for alcohol policy.<sup>16</sup>
- **Effective regulation has to be coherent and comprehensive** - applied and enforced across multiple media channels (including traditional print and broadcasting media, view on demand and other online media).
- Mandatory **warning messages accompanying alcohol information**, if carefully developed and displayed on rotation to avoid habituation, are a valid policy regulatory tool, which could raise public health awareness and alcohol health literacy and result in societal and industry behaviour change and improved population health.
- **Lower, low- and non-alcohol products** -There is some evidence that encouraging drinkers to switch to lower alcohol products could result in broad societal public health gains.<sup>17 18</sup> Specifically, unpublicised *reformulation* to lower the alcohol content of existing products shows more promising results than offering new low- or non-alcohol products. Regarding the latter, the regulation of non-alcohol products presents challenges in terms of a) dissociating brand visual identity for alcohol and low-/non-alcohol products; and, b) prohibiting promotion to minors, to prevent 'gateway' use.
- **Toolkits and guidance** have been developed by the EC JRC, WHO and Nordic Council, to support Member States with a range of policy landscapes in implementing more effective regulation on alcohol advertising, to reduce alcohol-related harm.

#### Key messages on regulation of alcohol marketing through *traditional* media

- Adverts, product placement and depictions of drinking all seem to exert an influence through many different media channels; but **the strongest associations have been found for television, movies, sponsorship and branded merchandise**, indicating a need to especially tighten regulations in these areas.
- The current **special status of wine** in some EU countries with regards to promotion and advertising needs to be re-examined and brought in line with health priorities.

## Key messages on regulation of alcohol marketing through *digital* media

- **Digital media, and particularly social networking sites (SNS), are the perfect environments for marketing companies** to invest in since they can be used to track real needs and interests of users who are potential consumers, or even co-opt consumers and influencers as part of the marketing team. In addition, digital media content can now be *targeted* to an individual level, based on users' preferences and tastes; and delivered to the target through a number of different devices, such as a tablet, phone or computer. The update review carried out for FAR SEAS affirms the association between exposure to digital marketing and drinking outcomes.
- Moreover, even though regulations exist in regard to the way alcohol can be promoted through traditional media and sponsorship, **only a few countries have adopted new measures to be applied to digital media, and there is a notable lack of legal guidelines on advertising through influencers on social media.**
- **Social Networking Sites (SNS) and, in particular, video sharing platforms** have been found to result in the highest awareness of alcohol advertising, which is an established predictor for the impact marketing on consumption and drinking behaviours.
- **User-generated content** in particular poses challenges to the regulatory frameworks, in order to enforce restrictions on alcohol promotion whilst ensuring that the democratic principle of freedom of expression is reasonably protected.

## Annex 2: Agenda of the workshop

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

14:00	Start of the session, welcome and Introduction: Toni Gual (chair) / EC & Czech hosts <ul style="list-style-type: none"> <li>- Video welcome by Alena Šteflová, Deputy Health Minister of the Czech Republic</li> <li>- Setting the scene – The Frame of EU Beating Cancer Plan (DG SANTE)</li> <li>- Audio-Visual Media Services Directive (AVMSD) (DG CNECT) &amp; JRC Toolkit on Marketing Codes of Conduct</li> </ul>
14:20	Evidence update - <b>Key messages from science on regulation of alcohol advertising in traditional media</b> – Wim van Dalen (EUCAM) & Gerard Hastings (Stirling, UK)
14:40	Country/EU multi-stakeholder experiences – <b>France, Estonia, FYFA Project (EU)</b>
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>How can MS be supported to ban alcohol advertising to protect young people, given that self-regulation has been found ineffective? (3 top priorities)</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 1

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

14:00	Start of the session, welcome back and Introduction: Toni Gual (chair) / EC & Czech hosts <ul style="list-style-type: none"> <li>- Welcome by the Czech National Drug Coordinator</li> <li>- Raising awareness of cancer (EU Cancer Plan – DG SANTE)</li> <li>- Warning messages in the AVMSD (DG CNECT) and JRC Marketing Codes of Conduct Toolkit (JRC)</li> </ul>
14:20	Evidence update - Sub-topic 2: <b>Mandating health information and warning messages</b> – Eva Jané-Llopis (ESADE, ES) & Mariann Skar / Sandra Tricas-Sauras (Eurocare)
14:40	Country/European multi-stakeholder experiences – <b>Ireland, Czech Republic, Slovenia</b>
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>How can we gather support for accurate and effective warning messages across different governmental sectors? How can messages be tailored to MS?</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 2

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

14:00	Start of the session, welcome back and Introduction: Toni Gual (chair) / EC & Czech hosts <ul style="list-style-type: none"> <li>- Frame of EU Beating Cancer Plan (DG SANTE)</li> <li>- Online aspects of the AVMSD (DG CNECT) and JRC Marketing Codes of Conduct Toolkit (JRC)</li> <li>- Welcome and points on the research-policy link by the vice-Dean of Charles University, Prague</li> </ul>
14:20	Evidence update - Sub-topic 2: <b>Impact and regulation of online marketing</b> – Nathan Critchlow (Stirling, UK) & Hanneke Hendriks (STAP, NL)
14:40	Country/European multi-stakeholder experiences – <b>Finland, Lithuania, Czech Republic</b>
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>Which are the key policy tools needed to overcome challenges in regulating online alcohol marketing? How can member states support each other in this?</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 3

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

14:00	Start of the session, welcome back and Introduction: Toni Gual (chair) / EC <ul style="list-style-type: none"> <li>- Drinking levels and cancer (Jürgen Rehm)</li> <li>- Points from the AVMSD and JRC Toolkit on Marketing Codes of Conduct on low- and zero-alcohol</li> </ul>
14:20	Evidence update - Sub-topic 4: <b>Science to support policy on low-strength and non-alcoholic product marketing</b> – Peter Anderson (Maastricht, NL) & Carmen Voogt (Trimbos, NL)
14:40	Country/European multi-stakeholder experiences – <b>Norway, Belgium, EPHA (EU)</b>
15:00	BREAK
15:10	Summary by sub-topic expert + Breakout discussions – <i>How can we promote the switch to low- and no-alcohol alternatives, whilst strengthening regulation of alcohol marketing? – 5 Key points for coherent policy.</i>
15:45	Feedback to whole group + Wrap up by hosts and session-topic experts
16:30	Close of Session 4

### Annex 3: Breakdown of participant attendance by sector, session and country.

#### Attendance by sector

Sector	Attendees		
Academia - research (alcohol epidemiology, survey)	1		
Academia - research (alcohol in social media)	1		
Academia - research (alcohol marketing, including TV, sport sponsorship, warning messages)	1		
Academia - research (alcohol public health, including epidemiology, comparative policy anal	3		
Academia - research (clinical and public health research)	3		
Academia - research (commercial determinants of ill-health)	1		
Academia - research (comparative alcohol policy analysis)	1		
Academia - research (determinants of substance use in youth)	1		
Academia - research (digital alcohol marketing)	1		
Academia - research (environmental determinants)	1		
Academia - research (harmful alcohol and substance use)	2		
Academia - research (knowledge transfer)	1		
Academia - research (marketing and warning messages)	1		
Academia - research (prevention, HR and treatment)	1		
Academia - research (social media and marketing)	3		
Academia - research (tobacco health warnings)	1		
Academia - research (youth alcohol use)	1		
<b>Academia total</b>	<b>24</b>		
Civil society - advocacy	1		
Civil society - Advocacy (communication users)	1		
Civil society - capacity building and advocacy	1		
Civil society - national temperance movement	3		
Civil society, healthcare - Advocacy	1		
Education - Youth	1		
European professional drug network	1		
Healthcare - Advocacy	4		
Intergovernmental collaboration	1		
NGO - Advocacy (European network of NGOs and public health organisations)	2		
NGO - Advocacy (European NGO alliance)	1		
NGO - Prevention	1		
<b>Civil society total</b>	<b>18</b>		
Public administration - Broadcasting/ media authority	12		
Public administration - Competition	1		
Public administration - Consumer protection	2		
Public administration - Education, culture	1		
Public administration - Food safety (national)	2		
Public administration - Healthcare provision (national)	1		
Public administration - Public health (alcohol legislation)	2		
Public administration - Public health (local)	1		
Public administration - Public health (MoH)	15		
Public administration - Public health (national)	25		
Public administration - Public health (regional)	8		
Public administration - Public health, drug/ alcohol (national)	1		
Public administration - Tax and customs	1		
Public administration -Public health (disease prevention)	1		
Public health - Monitoring, prevention, knowledge transfer (national)	3		
Public health - Nutrition (national)	2	Health	non-health
<b>Public administration total</b>	<b>78</b>	<b>59</b>	<b>19</b>
Public administration - DG CNECT (European)	1		
Public administration - Public health (European)	4		
<b>European Commission</b>	<b>5</b>		
Public health - international	1		
Umbrella for Flemish organisations dedicated to drugs; partner org of the Flemish gov't	1		
<b>TOTAL excluding organisers</b>	<b>127</b>		



Attendance by session

As on 2020.11.20	09/12/2020	14/12/2020	16/12/2020	21/12/2020
	Regulating traditional media – television, print, sponsorship	- Warning messages and consumer information to counter harm	Tackling online media promotion of alcohol	Regulating low-strength alcohol product marketing – closing loopholes
Speakers	9	6	4	5
Breakout discussants	23	26	27	26
Breakout observers	50	50	52	46
<i>Total</i>	82	82	83	77
As on 2020.12.03	09/12/2020	14/12/2020	16/12/2020	21/12/2020
	Regulating traditional media – television, print, sponsorship	- Warning messages and consumer information to counter harm	Tackling online media promotion of alcohol	Regulating low-strength alcohol product marketing – closing loopholes
Speakers	9	6	4	5
Breakout discussants	29	30	33	31
Breakout observers	73	71	73	63
<i>Total</i>	111	107	110	99
Post-workshop attendance statistics	09/12/2020	14/12/2020	16/12/2020	21/12/2020
	Regulating traditional media – television, print, sponsorship	- Warning messages and consumer information to counter harm	Tackling online media promotion of alcohol	Regulating low-strength alcohol product marketing – closing loopholes
Speakers	6	6	6	5
<i>Recorded only</i>			3	
Attendees	70	63	68	54
<i>Last minute registration</i>	1	3	7	
Organisers (including Chair)	8	7	8	8
<i>Deep Seas/Far Seas</i>	6	5	6	6
<i>External (cEvents)</i>	2	2	2	2
<i>Total</i>	84	76	82	67

## Attendance by country

<i>REGISTERED AS ON 05/12/2020</i>						109		
ATTENDED (excluding organisers)						127		
EU27	Attended	Registered	Candidate countries	Attended	Registered	European Neighbourhood Policy	Attended	Registered
Austria	1		Albania			Algeria		
Belgium	3	3	Montenegro			Armenia		
Bulgaria	1		North Macedonia			Azerbaijan		
Croatia	3	3	Serbia		1	Belarus		
Cyprus	3	2	Turkey			Egypt		
Czechia	5	6	Total	0	1	Georgia		
Denmark	2					Israel		
Estonia	3	1	Potential candidates	Attended	Registered	Jordan		
Finland	1	1	Bosnia and Herzegovina	2	4	Lebanon	2	2
France	5	5	Kosovo*			Lybia		
Germany	4	4	Total	2	4	Moldova		1
Greece	1					Morocco		
Hungary			Other European countries	Attended	Registered	Palestine		
Ireland	6	4	Andorra			Syria		
Italy	5	5	Iceland	2	1	Tunisia		
Latvia	3	2	Liechtenstein			Ukraine		1
Lithuania	2	2	Monaco			Total	2	4
Luxembourg			Norway	2	2			
Malta	1	1	Russia	4	4	Other intl. countries	Attended	Registered
Netherlands	7	7	San Marino			Australia		1
Poland	5	3	Switzerland	2	3	India		1
Portugal	9	5	United Kingdom	5	4	Nigeria		1
Romania	3	3	Vatican City			Total	0	3
Slovakia			Total	15	14			
Slovenia	3	3					Attended	Registered
Spain	16	12				European Commission	4	3
Sweden	2					European area	8	6
Total	94	72				International area	2	2
						Total	14	11

#### Annex 4: Session evaluation scores

Session 1 – Regulating traditional media – TV, print& sponsorship (N=37)	AVERAGE SCORE
Overall evaluation (score out of 10)	8.30/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.65/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	3.97/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	3.92/5

Session 2 – Warning messages and consumer information to counter harm (N=25)	AVERAGE SCORE
Overall evaluation (score out of 10)	8.32/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.68/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	4.20/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	4.08/5

Session 3 – Tackling online media promotion of alcohol (N=23)	AVERAGE SCORE
Overall evaluation (score out of 10)	8.52/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.65/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	4.22/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	4.26/5

Session 4 – Regulating low-strength alcohol product marketing – closing loopholes (N=19)	AVERAGE SCORE
Overall evaluation (score out of 10)	9.11/10
Topics and aspects relevant for the overarching theme of the session (score out of 5)	4.84/5
Actionable information for my work and/or consolidated my understanding/ knowledge (score out of 5)	4.47/5
Enough time and opportunities for interaction with the speakers and between participants (score out of 5)	4.37/5

## References

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- 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 Textbook Violence Prev Epidemiol Evidence, Policy*. 2015;1.
- 8 Brown W, Leonard KE. Does Alcohol Cause Violence and Aggression? (2017) *Wiley Handbook 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 World Health Organization (2010) *Global strategy to reduce the harmful use of alcohol*. Geneva: World Health Organization; 2010.
- 14 Rehm J, Lachenmeier DW, Jané-Llopis E, Imtiaz S, Anderson P. (2016). On the evidence base of reducing ethanol content in beverages to reduce the harmful use of alcohol *Lancet Gastroenterology & Hepatology*. 1: 78-83.
- 15 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://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-020-8403-8>
- 16 World Health Organization (2017) *Tackling NCDs - Best buys' and other recommended interventions for the prevention and control of noncommunicable diseases*. Geneva: World Health Organization; 2017.
- 17 World Health Organization (2010) *Global strategy to reduce the harmful use of alcohol*. Geneva: World Health Organization; 2010.
- 18 Rehm J, Lachenmeier DW, Jané-Llopis E, Imtiaz S, Anderson P. (2016). On the evidence base of reducing ethanol content in beverages to reduce the harmful use of alcohol *Lancet Gastroenterology & Hepatology*. 1: 78-83.