



Ms Helen Keefe  
Committee of Advertising Practice (Broadcast)  
Mid City Place  
71 High Holborn  
London  
WC1V 6QT

6 April 2005

Dear Ms Keefe

**BCAP Consultation on Broadcast Advertising of Alcohol - Section 2**

We are responding to the above consultation document as Bacardi-Martini (UK) Limited. We are a major advertiser in the alcoholic drinks sector and as such welcome the opportunity to comment on the draft guidance notes.

We welcome the approach in the consultation document in principle, but there are a few areas where we would like to see greater clarification as well as some areas where we believe the guidance for interpretation is too literal. These areas are as follows:

**Section 2 - Background**

We are concerned that reference continues to be made to recent research that indicates that advertising has some influence on young viewers' attitudes to drinking, albeit at a relatively low level compared to other factors.

Independent academic research that we have seen agrees that alcohol issues are very complex and that problems associated with alcohol are primarily related to family, culture, social and economic factors. The volume of alcohol, which is consumed in total, is valued at around £34.87bn per annum at retail prices (source: Mintel "Attitude Towards Drinking", March 2004). With a total broadcast advertising expenditure of around £142.47m (source: Ad Dynamix) behind alcoholic beverages, the share of alcohol supported by advertising is relatively low, and therefore has no significant primary effect on consumer behaviour.

**11.8.1. (a) (2)**

We would suggest that for sake of clarity the guidance notes should make clear that party scenes are permitted as part of the expression of a social occasion. We find it difficult to define what is a responsible social interaction (as opposed to what is not).

**11.8.1. (b)**

We would be concerned if the interpretation of the "daring" element of the rule would be designed to prevent associating alcohol with acts where out of the ordinary behaviour would be stopped simply because this was different to "normal" behaviour. What we would like to Guidance Notes to stress is a prevention of events or actions which could be seen as a catalyst to encourage irresponsible or anti-social behaviour.

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On "aggression", we would like to have clarification that the reference to violent attitudes would be prevented where clear images would be shown in the commercial rather than simply trying to prevent a potential attitude from being interpreted as potentially aggressive.

## **11.8.1. (c)**

We would like to suggest that in the paragraph where the linkage with alcohol and mild flirtation and romance is referred to, the reference to gentle dialogue, body language or facial expressions does not add much value. We think there is a clear distinction between the expression of sexual attraction or innuendo, and social interaction or communication. Interaction should not be sexually aggressive between individuals or groups.

## **11.8.1. (h)**

We would like to have a little more clarity on what the Guidance Notes would define as a hazardous environment. For example, drink-driving areas are very clear, but it would be appreciated if there was some clarification on locations near to water, e.g. drinking on a beach should be acceptable, but not in the water itself (e.g. on a boat or in the shallows of the seashore).

## **11.8.2. (a)**

We agree that it is not possible to produce an exhaustive list of possible infringements on the youth culture rule. However, in order to give credence to areas where caution should be exercised, we would suggest that the area of teenage fashion or clothing should be deleted from the specific list. It would also be extremely difficult to define under point (d) what music or dance actions are so specific that they would appeal strongly to under-18s. It would be useful if the Guidance Notes could provide a clear and almost extreme example to differentiate what would appeal strongly to under 18s and what would, by definition, appeal strongly to over 18s.

We have no other comments under Section 2 of the Consultation and we are broadly supportive of the need to have an informal review of how the new Guidance Notes and Codes have been implemented in due course.

Yours sincerely



**Chris Searle**  
**Executive Director**