



BROWN-FORMAN

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

11th April 2005

Dear Ms Keefe

BCAP Consultation on Broadcast Advertising of Alcohol - Section 2

We are responding to the above consultation document as Brown-Forman Beverages (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 We are a major advertiser in the alcoholic drinks sector and as such welcome the opportunity to comment on the draft guidance notes.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; however, we would like to see greater clarification in the following sections:

11.8.1. (a) (2)

The phrase “lively, but responsible, social interaction” may be difficult to define. 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 such an occasion.

11.8.1. (b)

We would be concerned if the interpretation of the “daring” element of the rule resulted in preventing the association of alcohol with behaviour displaying traits of individuality, independence of mind or other “out of the ordinary” but perfectly acceptable social behaviour. What we would like the 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.

11.8.1. (h)

We would like to have a little more clarity on what the Guidance Notes would define as “an environment that is hazardous”. For example, 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, there would seem to be a need to define more precisely what constitutes “teenage fashion or clothing mostly associated with those under 18” (point c) and “music or dance that is likely to appeal strongly to under-18s” (point d). In the absence of such clarification we would suggest that these points should be deleted from the specific list.

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,

Andrew Wilby
Managing Director

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