



Institute of Practitioners in Advertising

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

4th April 2005

Dear Ms Keefe

Broadcast advertising of alcohol consultation

The Institute of Practitioners in Advertising (the "IPA") is the trade association and professional institute for UK advertising agencies. Our 238 corporate members are primarily concerned with providing strategic advice on marketing communications, including creating and/or placing advertising. Based throughout the country, they are responsible for over 85% of the UK's advertising agency business and play a pivotal role in advising the nation's companies on how they should deploy their total marketing communications spend of £14 billion.

The IPA has received the consultation paper on the guidance notes for the TV Alcohol Advertising Rules and welcomes the opportunity to respond to it. This response should be read in conjunction with the response from the Advertising Association, whose comments the IPA also endorses.

The IPA supports the publishing of the guidance notes as it will inevitably increase the level of understanding for advertising agencies. The IPA considers the new guidance notes to be tough but manageable.

We believe that there is generally too little emphasis in the notes on the misuse of alcohol and an inclination towards demonising alcohol *per se*. Alcohol is a product which, when used in moderation, is perfectly acceptable, and the IPA therefore strongly supports the freedom to advertise the product, on the basis that it is done so sensibly and responsibly. We trust that this positive view will be the starting point in any consideration of scripts or investigation of a complaint.

The IPA also has a particular concern with the guidance notes interpreting clause 11.8.2(a). This is a fundamentally important rule as it deals with the Government's principal aim of reducing the appeal of alcohol to children

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and teenagers. Advertising agencies therefore need to be particularly careful not to fall foul of this rule. However, agencies are faced with the problem that most music, dance and fashion which appeals to people in the age range 18-25 will also appeal strongly to under-18s. The guidance notes do not make it easy to differentiate, particularly in these areas where there is so much overlap, between what is appealing to people over 18 (and therefore acceptable) and what appeals strongly to people under 18 (and therefore is not permitted). Further clarification would be welcome.

Finally, the IPA assumes that the guidance notes, when finalised, will form part of the BACC Notes of Guidance. It is the IPA's view that any duplicity of guidance notes would be detrimental and unhelpful for the industry.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Chris Hackford', written in a cursive style.

Christopher Hackford
Legal Manager

A long, horizontal, handwritten mark in blue ink, possibly a signature or a checkmark, located below the typed name.