

30 March 2005

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Dear 

Guidance Notes for the TV Alcohol Advertising Rules

The Institute is concerned with the prevention of harm associated with alcohol products, and it is from this perspective that we address very briefly the issues raised in the Consultation Paper.

In the main we welcome the proposals as far as they go, and we wish to make only two specific points about the Guidance notes themselves:

1. In the introductory section (background) it is stated that one of the aims of regulation is *'to reduce any negative impact of alcoholic drinks advertisingon children and young teenagers'*. Whilst, of course, it is necessary to prevent advertising which seeks to associate alcohol products with anti-social behaviour, any advertising, however 'socially responsible' its content, is having a negative impact on children and young teenagers if it increases the likelihood of their attempting to buy or consume the product.
2. In regard to Rule 11, 8.1 ©, the sentence *'It is permissible to link warm, sensuous images or dialogue to alcohol but they must not seem to be linked to a sexual motive.'* is in our view verging on the self-

contradictory, especially as it is later stated that linking alcohol to 'mild flirtation or romance' is acceptable. The distinction between sensuous and sensual is a nice one and will be difficult to maintain. We would prefer the Guidance to be clearer on this point.

In conclusion, as point 1 above suggests, there are other, probably more important, issues to do with alcohol advertising than the subject of this consultation. Protecting children and young teenagers requires reducing their exposure to alcohol advertising and promotion per se, and this raises issues to do with the volume and the placement of advertising. We hope that these issues will be addressed at some point.

We are particularly concerned at the implications of the recent comments of the chief executive of Ofcom in regard to a possible relaxation of the rules governing product placement.¹ Clearly, there is a danger that any good resulting from the new Guidelines could be undone by largely unfettered proliferation of alcohol product placement.

Yours sincerely



Andrew McNeill

¹ Stephen Carter: Incorporated Society of British Advertisers' Conference. March 2005