

## Magazine alcohol advertising compliance with the Australian Alcoholic Beverages Advertising Code

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### Abstract

The purpose of this study was to assess the frequency and content of alcoholic beverage advertisements and sales promotions in magazines popular with adolescents and young people in Australia, and assess the extent to which the ads complied with Australia's self-regulatory Alcoholic Beverages Advertising Code (ABAC). Alcohol advertisements and promotions were identified in a sample of 93 magazines popular with young people. The identified items were coded against 28 measures constructed to assess the content of the items against the five sections of the ABAC. Two thirds of the magazines contained at least one alcohol advertisement or promotion with a total of 142 unique items identified: 80 were brand advertisements and 62 were other types of promotional items (i.e. sales promotions, event sponsorships, cross promotions with other marketers and advertorials). It was found that 52% of items appeared to contravene at least one section of the ABAC. The two major apparent breaches related to section B – the items having a strong appeal to adolescents (34%) and to section C – promoting positive social, sexual and psychological expectancies of consumption (28%). It was also found that promotional items appeared to breach the ABAC as often as did advertisements. It is concluded that the self-regulating system appears not to be working for the alcoholic beverages industry in Australia and that increased government surveillance and regulation should be considered, giving particular emphasis to the inclusion of promotional items other than brand advertising. [Donovan K, Donovan R, Howat P, Weller N. Magazine alcohol advertising compliance with the Australian Alcoholic Beverages Advertising Code. *Drug Alcohol Rev* 2007;26:73–81]

**Key words:** advertisement, alcohol, magazine, promotion, self-regulation.

### Introduction

Alcohol plays a significant role in Australian culture – particularly in the culture of young people. For the purpose of this paper, young adults shall be defined as 18–26 years of age; adolescents as 12–17 years of age. By the age of 14, 90% of Australian school students had tried alcohol and by the age of 17, over 70% had drunk alcohol in the last month [1]. National surveys in Australia indicate teenagers are frequent consumers of alcohol, with 28% of 14–19 year olds reporting drinking weekly or more often in 2001 [2]. Similar rates are found in the US [3] and a recent study in the UK reported that 16–24 year olds have the highest levels of

unsafe consumption of alcohol relative to all other age groups [4].

These data are of concern as the consumption of alcohol has long been recognised as a significant source of harm. Drinking above the recommended safe levels increases the risk of developing a number of health-related problems, including injury, and the economic and social costs related to the misuse of alcohol are considerable [5].

Many factors influence alcohol consumption, including social, individual, structural and marketing factors [7]. Being part of a social network in which alcohol is usually available, feeling obligated to consume alcohol at social gatherings, and reporting being motivated to

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drink alcohol for social benefits are all significantly correlated with alcohol consumption [6]. Peer influence is recognised as playing an important role, as is the role of the family [7], along with the perceived social acceptability of alcohol use at potentially harmful levels and the expected psychological benefits of alcohol consumption [8].

Marketing factors include product innovation, packaging, discounting and advertising. Whilst a causal link is yet to be established, researchers have found a positive correlation between youth exposure to alcohol advertisements and intention to drink or actual drinking [9]. Although the alcohol industry maintains the purpose of its advertising is to retain product loyalty or induce people to switch brands, rather than to attract new consumers [10], research suggests that brand advertisements also promote the consumption of alcohol *per se* [11–13]. A number of studies implicate alcohol advertising influencing the drinking behaviour of children. Advertising may predispose children to alcohol use by fostering the development of positive attitudes toward alcohol [14] and liking for alcohol commercials has been found to predict drinking in hazardous contexts [15,16]. Exposure to alcohol advertising has been linked to excessive alcohol consumption [17], and adolescents who recall more alcohol advertisements at age 15 drank more at age 18 [18]. It has also been suggested that alcohol advertising may influence adolescents by promoting positive associations with alcohol and linking alcohol consumption with attractive symbols, role models and outcomes [19]. A recent study found that while the messages conveyed in magazine advertisements for alcoholic beverages are largely open to interpretation, they do have potential to communicate dangerous messages to young people about alcohol use [20].

A number of countries have introduced a regulatory code of advertising in relation to alcohol. In Australia, this code is self-regulatory. Self-regulation is a process whereby advertisers work together with their agencies and the media to ensure that advertising standards are agreed to and, in theory, adhered to. There are two basic elements of self-regulation: a code of practice or set of guiding principles governing the content of advertisements, and a process for the establishment, review and application of the code or principles [21].

In Australia, the alcoholic beverages industry created the Alcoholic Beverages Advertising Code (ABAC) and its own complaints management system, the Alcoholic Beverages Advertising Code Complaints Adjudication Panel. This panel reports to the Alcoholic Beverages Advertising Code Management Committee, which is responsible for overseeing the ABAC [22]. The Code is shown in Table 1.

However, several recent reports suggest that the ABAC is not being complied with [19,20,23–25].

In an observational study of websites, transit advertising and magazine ads, Roberts suggested that alcohol advertisements across all these media appeared to be contravening the ABAC in a number of ways, and specifically, by associating alcohol products with sexual, social and sporting success [20].

Jones and Donovan suggested that the targeting of radio advertisements for a pre-mixed spirits brand may be outside industry guidelines as the advertisements were perceived by a substantial proportion of their sample to suggest that consumption of alcohol can lead to a significant change in mood, has a therapeutic benefit in aiding relaxation, and can contribute to social and sexual success [24].

The Ministerial Council of Drug Strategy Review of the Self-Regulatory System for Alcohol Advertising [23] found that none of the 361 alcohol advertising complaints heard by the Advertising Standards Board in the period 1998–2002 was upheld, and Jones and Donovan showed that the Advertising Standards Board had dismissed a number of complaints about alcohol advertisements that even marketing experts considered breached the Code [25].

The above studies focussed on specific advertisements or small samples of advertisements. There appear to be no recent studies in Australia that have measured the prevalence of alcohol advertising and systematically analysed the themes therein with respect to compliance or otherwise with the ABAC. The objectives of this study therefore were to determine the prevalence of alcohol brand advertisements and other promotional items in a sample of magazines popular with young people, and to analyse the themes therein with specific reference to potential breaches of the ABAC. Under ‘other promotional items’, we include sales promotions, event sponsorships (e.g. Jim Beam pictured and featured as a sponsor in an ad for a music event), advertorials (e.g. the product – Toohey’s Dry – is allegedly ‘reviewed’ by a magazine writer with respect to taste, etc), and joint promotions (e.g. a television channel and a brewer jointly promoting a sporting event to be aired on that channel). Sales promotions are distinguished from brand advertisements in that their emphasis is on short term incentives for purchase, whereas brand advertisements have broader, longer term objectives of positioning the brand in the consumer’s mind [26]. Sales promotions include sweepstakes, price discounts, merchandising offers and premiums. Sales promotions may include cross promotions with other marketers. To date, none of the studies of alcohol advertising have made this distinction. However, given the differential emphases of advertising versus sales promotion, it was expected that there could be differences between them with respect to potential breaches of the Codes. It was expected that promotions might yield less breaches

**Table 1.** *The Alcoholic Beverages Advertisers Code*

The ABAC states that advertisements for alcohol must:

- (A) *Present a mature, balanced and responsible approach to the consumption of alcohol beverages and, accordingly:*  
 must not encourage excessive consumption or abuse of alcohol;  
 must not encourage underage drinking;  
 must not promote offensive behaviour or the excessive misuse or abuse of alcohol beverages;  
 must only depict the responsible and moderate consumption of alcohol beverages.
- (B) *Not have a strong or evident appeal to children or adolescents and, accordingly:*  
 adults appearing in advertisements must be over 25 years of age and be clearly depicted as adults;  
 children and adolescents may only appear in advertisements in natural situations (e.g. family barbecue, licensed family restaurant) and where there is no implication that the depicted children and adolescents will consume or serve alcohol beverages;  
 adults under the age of 25 years may only appear as part of a natural crowd or background scene.
- (C) *Not suggest that the consumption or presence of alcohol beverages may create or contribute to a significant change in mood or environment and, accordingly:*  
 must not depict the consumption or presence of alcohol beverages as a cause of or contributing to the achievement of personal, business, social, sporting, sexual or other success;  
 if alcohol beverages are depicted as part of a celebration, must not imply or suggest that the beverage was a cause of or contributed to success or achievement;  
 must not suggest that the consumption of alcohol beverages offers any therapeutic benefit or is a necessary aid to relaxation.
- (D) *Not depict any direct association between the consumption of alcohol beverages, other than low-alcohol beverages, and the operation of a motor vehicle, boat or aircraft or the engagement in any sport [including swimming and water sports] or potentially hazardous activity and, accordingly:*  
 any depiction of the consumption of alcohol beverages in connection with the above activities must not be represented as having taken place before or during engagement of the activity in question and must in all cases portray safe practices;  
 any claim concerning safe consumption of low-alcohol beverages must be demonstrably accurate.
- (E) *Not challenge or dare people to drink or sample a particular alcohol beverage, other than low-alcohol beverages, and must not contain any inducement to prefer an alcohol beverage because of its higher alcohol content.*
- (F) *Comply with the Advertiser Code of Ethics adopted by the AANA.*

Source: Distilled Spirits Industry Council of Australia, Inc. (DSICA, 2003), *Issues: The Alcohol Beverages Advertising Code*, online at: <http://www.dsica.com.au>.

than advertisements given the former's emphasis on sales and the latter's emphasis on brand and user imagery [27].

## Method

### Sample

A sample of 35 magazine titles published during the period August 2001 to May 2002 was analysed. The magazines were previously identified as popular with the 18–30 years age group on the basis of readership statistics provided by Roy Morgan Research Pty Ltd [28]. During the study period, these 35 titles yielded a sample of 93 publications, 83 Australian magazines and 10 imported magazines.

### Procedure

The unit of analysis was an advertisement or promotional item for an alcoholic beverage. Items appearing multiple times were content analysed only once, although each appearance was logged for frequency. The authors KTD and NJW first coded each item

independently, and then compared their coding for each item, jointly assessing any inconsistencies between the two sets of data. Both coders were in their mid twenties and hence in the age range of the magazines' (and hence the advertisers') target audience. Hence the coders would have been aware of nuances that perhaps older coders might not have been. These coders' classifications were then further checked against two slightly older coders who were instructed to take a strict view for classification of an item as breaching the Code. Only items that at least three of the four coders believed breached the Code were designated as such.

### Development of the coding frame

The coding frame and coding procedure were informed by previous studies of alcohol advertising [24,29, 30,31], and by recent studies on portrayals of incidental smoking in the media [32]. There were three main categories of codes [33]. The first were largely objective, physical measures of the item such as the size of the advertisement, colour, presence or absence of people, and, if present, their appearance and whether or not they were shown drinking. The second category was

also largely objective and related to the type of alcohol depicted and the extent to which the item promoted product attributes such as taste or ingredients, or marketing aspects such as packaging, discounting or availability. The third category was concerned with more subjective interpretations such as themes portrayed in the items (e.g. humour; love and romance; reward). As part of the last category, 28 specific variables initially developed by author PH in a previous project and refined by all four authors for this project, were written into the coding frame regarding the Alcoholic Beverages Advertising Code. These variables and the corresponding ABAC articles are shown in Table 2. The results for these ABAC variables form the focus of this report.

## Results

### Prevalence

Two thirds of the 93 magazines analysed contained at least one alcohol item. In total, 182 items were identified, of which 62 (34%) were classified as promotions and 130 (66%) as advertisements. Of the 62 promotions, 22 were advertorials, 19 promoted sales incentives, 15 were sponsorships and six were cross promotions with other marketers. There was an average of approximately two items per magazine. Hence, in the magazines that featured at least one item, there was an average of almost three items. The highest number of items in any single edition was 11, found in 'FHM', a magazine targeting young men.

**Table 2.** Variables relating to ABAC and incidence of breaches

ABAC Section	Variable	Brand Ads		Promotions		Total Items	
		(n = 80)	%	(n = 62)	%	(n = 142)	%
	<i>Item encourages:</i>						
(A) i.	Excessive consumption of alcohol	2	2.5	10	16.1	12	8.5
iii.	Misuse or abuse of alcohol	0	0.0	0	0.0	0	0.0
iii.	Offensive behaviour	4	5.0	3	4.8	7	4.9
	<i>Item depicts beverage as:</i>						0.0
iv.	Enabling consumer to become intoxicated quickly or easily	0	0.0	1	1.6	1	0.7
(B)	Item has strong appeal to children/teens	16	20.0	15	24.2	31	21.8
i.	Adults not clearly over age 25 [of items with people depicted]	14	17.5	9	14.5	23	16.2
	<i>Item depicts beverage as contributing to:</i>						
(C)	Increased confidence/assertiveness	4	5.0	1	1.6	5	3.5
	A significant change in mood	5	6.3	9	14.5	14	9.9
	Decreased worries/anxiety of drinker	0	0.0	0	0.0	0	0.0
	A reduction in negative emotions	0	0.0	0	0.0	0	0.0
	Increased ability to talk to others	0	0.0	1	1.6	1	0.7
	Decreased shyness of drinker	0	0.0	4	6.5	4	2.8
i.	Individual attractiveness	2	2.5	0	0.0	2	1.4
i.	Personal success	1	1.3	1	1.6	2	1.4
i.	Sexual success	5	6.3	5	8.1	10	7.0
i.	Increased popularity	3	3.8	4	6.5	7	4.9
i.	Physical strength/toughness of character	3	3.8	0	0.0	3	2.1
i.	Sporting success	0	0.0	0	0.0	0	0.0
i.	Social status/position of power	0	0.0	1	1.6	1	0.7
i.	Business/financial success	0	0.0	0	0.0	0	0.0
iii.	Relaxation	2	2.5	2	3.2	4	2.8
iii.	Increased energy of drinker	1	1.3	2	3.2	3	2.1
iii.	Having therapeutic benefits	2	2.5	0	0.0	2	1.4
	<i>Item associates alcohol with:</i>						
(D)	Risk-taking, daredevil stunts, extreme sports	2	2.5	1	1.6	3	2.1
	Operation of a boat	0	0.0	0	0.0	0	0.0
	Swimming or water sports	1	1.3	0	0.0	1	0.7
	Operation of a motor vehicle	0	0.0	0	0.0	0	0.0
(E)	Item challenges or dares people to drink or try a particular drink	1	1.3	2	3.2	3	2.1

Whilst no promotions were repeated, a number of the advertisements appeared more than once, such that there were 80 unique advertisements. The content analyses below are reported for the 142 unique items.

The most frequently featured type of alcohol in the magazines analysed was straight spirits (41%). Beers and ales were next most prevalent (30%), followed by wine brands and wineries (20%) and pre-mixed spirits (9%). When pre-mixed and straight spirits are grouped together, they account for almost half of all the items.

#### *Alcoholic Beverages Advertising Code*

The results for the 28 variables corresponding to the ABAC sections A to E are presented by item type in Table 2. Table 3 summarises the extent of breaches for each ABAC section by item type. Table 3 shows that 52% of all items were deemed to breach one or other of the five sections of the ABAC, and that promotions breached the ABAC equally as often as did brand ads. The results are presented for each ABAC section in turn.

#### *ABAC – Section A: ‘Advertisements must present a mature, balanced and responsible approach to the consumption of alcohol beverages’*

Twelve items were deemed to encourage excessive consumption (8.5%), seven to encourage offensive behaviour (5%), and one was deemed to be promoting a benefit of becoming intoxicated quickly or easily (Table 2). Overall, 12% of items appeared to breach at least one of the variables of section A of the ABAC (Table 3). Advertorials were more likely to appear to breach section A than any other type of item: 36% of advertorials vs. 8% of the brand ads and all other promotions.

Some items considered to breach section A used terms such as ‘easy to down’ and ‘slam it down’. One

beer containing guarana (a Brazilian plant with similar characteristics to caffeine) was promoted as ‘the perfect beer to swig before a jog’.

#### *ABAC – Section B: ‘Alcoholic beverage advertisements must not have a strong appeal to children or adolescents’*

One fifth (22%) of items were considered to have a strong appeal to children or adolescents. These generally featured activities that young people enjoy such as skateboarding and partying and the people portrayed in these items were generally deemed to be under 25 years of age (Table 2). Items considered appealing to adults generally did not feature these activities, focused on characteristics of the beverage such as taste, and the people in these items tended to be judged to be in the 25–29 and 30–39 years age brackets.

Approximately 16% of all items were deemed to feature people that were not clearly over 25 years of age (Table 2). Amongst only those items that featured people, approximately one third featured adults that were not clearly over 25 years of age.

Overall, one in three items (34%) were deemed to breach one or other of the measures of section B: 36% of brand ads and 31% of promotional items (Table 3). Overall, sponsorship items (53%) were more likely to breach this section than other item types.

#### *ABAC – Section C: ‘The advertising should not suggest that the consumption or presence of alcohol beverages may create or contribute to a significant change in mood or environment’*

Table 2 shows that apparent breaches of section C of the Code occurred over a variety of measures, with the most frequent relating to the broad categorization of ‘contributing to a significant change of mood’ (10% of all items), followed by ‘contributing to sexual success’ (7%) and ‘increased popularity’ (5%). Combining the C measures into themes of ‘increased self-confidence’ (assertiveness; decreased shyness; increased ability to talk to others; toughness of character), ‘positive mood effect’ (change in mood, relaxation; increased energy; therapeutic benefits), ‘contributing to individual enhancement’ (individual attractiveness; personal success; increased popularity; social status), and ‘sexual success’, 16% of items appeared to offer the benefits of a substantial positive change in mood, 9% promoted increased self-confidence, 8% promised increased individual success, and 7% suggested sexual success will follow brand consumption.

Overall, 27.5% of items were deemed to be in breach of one or other measure in section C of the ABAC (31% of promotions and 25% of brand ads; Table 3).

**Table 3.** ABAC section breaches by item type

ABAC Section	Brand Ads		Promotions		Total Items	
	(n = 80)	%	(n = 62)	%	(n = 142)	%
A	6	7.5	11	17.7	17	12.0
B	29	36.3	19	30.6	48	33.8
C	20	25.0	19	30.6	39	27.5
D	3	3.8	1	1.6	4	2.8
E	1	1.3	2	3.2	3	2.1
Any	42	52.5	32	51.6	74	52.1

*ABAC – Section D: ‘The ad must not depict any direct association between the consumption of alcohol beverages, other than low-alcohol beverages, and the operation of a motor vehicle, boat or aircraft or the engagement in any sport (including swimming and water sports) or potentially hazardous activity’*

Only 3% of all items (three brand ads and one promotion) were deemed to be in breach of section D of the ABAC.

*ABAC – Section E: ‘Advertisements must not challenge or dare people to drink or sample a particular alcohol beverage, other than low alcohol beverages, and must not contain any inducement to prefer an alcohol beverage because of its higher alcohol content’*

Only 2% of all items (one brand ad and two promotions) were deemed to be in breach of section E.

Overall, 52% of all items were deemed to possibly breach at least one article of the ABAC. Although the sub set numbers are small, there were no significant differences by item type on this overall measure: 52.5% of brand ads; 56% of sales promotions; 50% of cross promotions; 53% of sponsorships; and 50% of advertorials. However, advertorials appeared to breach more sections than the other types of items. Substantial proportions of advertorials appeared to breach three of the five sections (A: 36%; B: 27%; C: 41%), whereas a substantial proportion of brand ads and sales promotions appeared to breach only sections B (36% and 21% respectively) and C (25% and 37% respectively), and sponsorship breaches were confined mainly to section B (53%).

### Examples of apparent breaches

Examples of items that appear to breach the ABAC are shown in Figures 1 to 5.

The brand ad in Figure 1 implies that drinking this beer can contribute to sporting fitness and sexual prowess, and in doing so appears to contravene section C of the code. Further, with the implication that you can drink excessively (‘live it up’) and still stay fit and healthy, the advertisement appears to breach section A.

The brand ad in Figure 2 appears to contravene sections B and C of the code. The advertisement appears designed to appeal to adolescent girls. We see a young, attractive girl on the couch about to kiss a young attractive guy, whilst behind him, is a picture of the same girl with a different guy. The caption at the bottom left – ‘substitute’ – implies that subzero drinkers are sexually successful.

The Jim Beam sponsorship promotion of the Planet X Tour potentially contravenes sections A, B and D of the ABAC (Figure 3). The advertisement features a



Figure 1. ‘Carlton LJ’ - *Men’s Health*, November 2001.

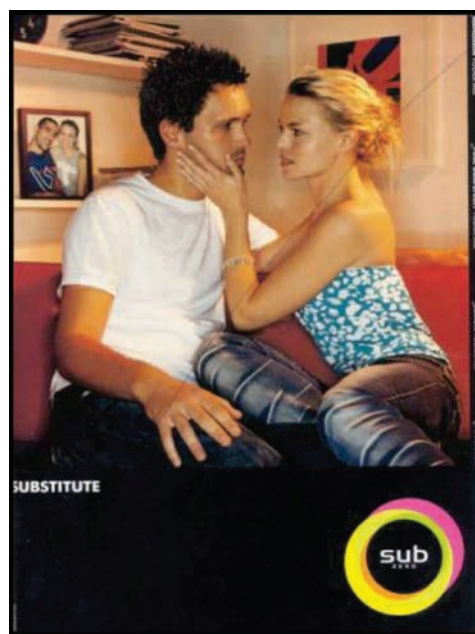


Figure 2. ‘Subzero’ – *Cosmopolitan*, 2002.

bottle of ‘Jim Beam’ bourbon perched on a skateboard, a popular means of transport with male children and teenagers. The bottle is shown executing a ‘risk-taking’ jump on a skate rink, falling off and then lying next to the skateboard as if passed out or hurt. The bottle is wearing none of the protective gear usually associated with these jumps. The copy at the bottom of the



advertisement features ‘freestyle sports, demos, DJ’s, live bands’ all of which are attractive pastimes for adolescents.

Figure 4 shows a cross promotion for ‘Fox Sports’ and Carlton and United Breweries (CUB). This item, which associates interest in sporting events with beer

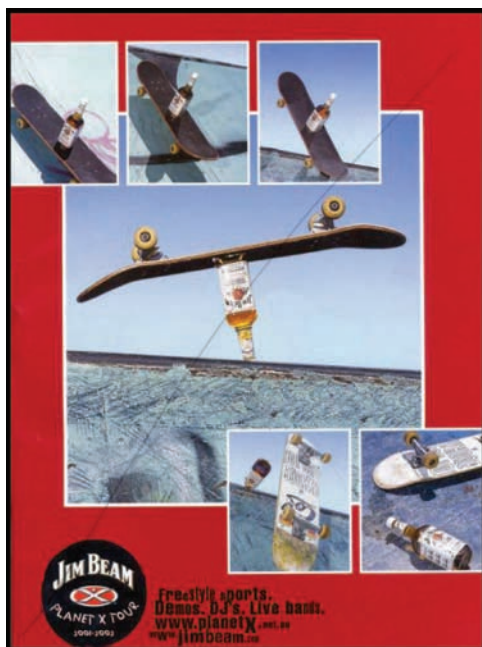


Figure 3. ‘Jim Beam’ – *Inside Sport*, April, 2002.



Figure 4. ‘Carlton United Breweries’ – *Ralph*, October, 2001.

consumption, appears to contravene section A of the ABAC in that the amount of beer allocated to each sporting event clearly exceeds the NHMRC recommended limit for safe drinking if consumed by one person. The humour in the picture (i.e. different beer brands replacing different foods and beverages normally found in a fridge) could be seen as appealing to adolescents. Furthermore, a sub text of the Foxtel/CUB item is that enjoyment of watching sporting events is heightened by beer consumption – which contravenes section C with respect to contributing to positive mood enhancement.

Figure 5 was part of a ‘Cleo Promotion’ and appears to contravene sections A, B and C of the code. The item encourages excessive consumption by suggesting the reader consume Midori with almost everything she/he does on Christmas day – from opening presents to decking the halls to carving the turkey, and includes features that have a strong appeal to children: the use of a cartoon character and bright, attractive colours. The line ‘make this versatile thirst quencher your drink of choice for all your summer soirees and you’ll be the hostess with the mostest – guaranteed’ suggests that the consumption of Midori is a cause of, or contributes to, the success of the celebration and that of the host.



Figure 5. ‘Midori’ – *Cleo*, December 2001. Note: The caption in the top left hand corner reads, ‘MIDORI. Start dreaming of a green Christmas with Midori – that sweet, melon-flavoured liqueur – perfect for decking the halls with your very own emerald infused creations. Think Midori-and-lemonade-scented kisses under the mistletoe, chic Midori cocktails before carving the turkey, and Midori fruit treats after opening presents. Make this versatile thirst quencher your drink of choice for all your summer soirees and you’ll be the hostess with the mostest – guaranteed’.

## Discussion

The results of this study support the findings of a number of recent Australian studies that suggest that alcohol advertisements appear to be contravening the Alcoholic Beverage Advertising Code [19,20,24] and getting away with it [23,25]. The results support the questioning of whether self-regulation is working in Australia [25] and the call for closer scrutiny of alcohol advertisers and monitoring bodies.

The results of this study also suggest a need to more strongly regulate the advertising of alcoholic beverages in the print media and that specific attention should be given to promotional items for alcoholic beverages as they may be circumventing the voluntary Alcoholic Beverage Advertising Code by appearing as competitions, giveaways, joint promotions and advertorials. While the National Committee for the Review of Alcohol Advertising recommended that internet advertising be included in the ABAC's definition of an advertisement, they decided not to include other forms of advertising such as sponsorship and point of sale advertising. Furthermore, it remains unclear as to who has responsibility for compliance with the Code in cases of sponsorship and cross promotional items.

With respect to breaches in this sample of alcohol advertisements, the major areas for concern are sections B and C. Section B refers to targeting younger persons and section C deals with the social, sexual and psychological expectancies of alcohol consumption which have been found to predict young people's alcohol consumption [8,34–37]. Given young people's susceptibility to these themes in general, it is crucial that future Codes be far more strictly applied in this area, particularly with respect to simultaneous breaches of B and C.

A very small number of unique items (13%) contained an observable 'drink in moderation' or related message. However, the message was often difficult to find, generally in small print and usually running down the side of the page. Hence, one would have to be looking for the message in order to see it. There is therefore an opportunity to include in any new Code, the requirement for a 'moderation' message of a required size and format as for tobacco warnings.

However, the alcoholic beverages industry has a history of being slow in abiding with voluntary codes of advertising both in Australia and overseas, and governments have consistently shown a reluctance to strictly enforce alcohol advertising standards. They have also been lenient on restricting alcohol advertisements compared to those promoting tobacco products. It is therefore timely for state and federal governments to re-examine the effectiveness of voluntary advertising codes for alcoholic beverages and replace them with strict advertising guidelines. In particular, a systematic

surveillance system could be put in place modelled on the methods in this study. Sampling of alcohol ads from print and broadcast media could be content analysed on an ongoing basis to identify breaches of the Codes. It may well be that a gradual phasing out of all alcohol advertising and sales promotions, as is happening worldwide for cigarettes, should be seriously considered if this surveillance shows that the alcohol industry does not comply with the Code. Given also that a number of alcohol marketers remain outside the voluntary system, a compulsory system may be the only alternative.

There is also the issue of the subjective nature of several of the sections of the ABAC, and hence the matter of different persons (e.g. advertisers) having different interpretations of ad executions than others (e.g. public health advocates). In addition to the suggested surveillance system, we therefore recommend that the industry and health authorities work together on not just revising the ABAC, but also on the specific measures that would be used to assess whether or not breaches occurred.

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