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ANNEX C

1 September 2009

Analysis by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) of the Sheffield University review of the relationship between Price, Promotion and Harm (SchARR)

To note: The CAP and BCAP SchARR analysis documents were produced as addenda to the full Advertising Code Review public consultation documents. The addenda should be read alongside those documents. The consultation has now closed. However, the full consultation documents, can be viewed on the CAP website at:

<http://www.cap.org.uk/cap/Consultations/closed/closed+consultations.htm>

CAP SchARR review analysis – Code Review Consultation Addendum

The Independent Review of the Effects of Alcohol Pricing and Promotion published by the School of Health and Related Research at the University of Sheffield (SchARR)

Please note:

This is an addendum to the CAP Code Review and should be read in association with the Introductory sections (Part 1) of the CAP consultation document, as well as Section 18 (Alcohol).

Responses to the question below are invited by 5pm on 10 July 2009. Please see Annex 3 of the CAP Code Review for details about how to respond to this consultation

Introduction

On page 18 of the Department of Health's *Safe, Sensible, Social* consultation, the Secretary of State for Culture Media and Sport asked CAP and BCAP to take into account, as part of the CAP and BCAP Code Reviews, the findings of the Independent Review of the Effects of Alcohol Pricing and Promotion conducted by Sheffield University ('the SchARR Review'), which considered the relationship between the price and promotion of alcohol and alcohol-related harm. The SchARR Review can be accessed at http://www.dh.gov.uk/en/Consultations/Liveconsultations/DH_086412

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In October 2008, CAP and BCAP informed the Secretary of State that the Review's proposed publication date would not allow sufficient time for the Committees to consider its findings as part of their Code Review. CAP and BCAP undertook, however, to review the findings at the earliest possible opportunity in 2009. The Government accepted that approach.

The SchHARR Review was published on 3 December 2008. The review is broad, covering tax and pricing, the effect of alcohol consumption on health and, of relevance to the CAP Code Review, it contained findings on the relationship between alcohol advertising and increased consumption and it set out to explore the potential impact of restrictions on the placement of non-broadcast alcohol advertisements, including a ban on alcohol advertising. The SchHARR Review does not contain findings on the relationship between the creative content of alcohol advertising and increased consumption. CAP's review of rules on the creative content of marketing communications for alcohol is presented in Section 18 of the CAP Code Review consultation.

Background

In March 2004, the Prime Minister's Strategy Unit published the Alcohol Harm Reduction Strategy for England¹. It concluded, 'There is no clear case on the effect of advertising on behaviour. One recent study suggests that such an effect may exist, but is contradicted by others which find no such case. So the evidence is not sufficiently strong to suggest that measures such as a ban on advertising or tightening existing restrictions about scheduling should be imposed by regulation.' (page 33)

CAP has considered whether the evidence contained in the SchHARR Review is sufficiently strong to suggest that the scenarios it outlines, such as a ban on alcohol advertising or tightening existing restrictions on the placement of non-broadcast alcohol advertisements, may be merited. Presently, the CAP Code states that no medium should be used to advertise alcoholic drinks if more than 25% of its audience is under 18 years of age; the ASA determines conformity with that rule using objective data or, if that is not available, a qualitative assessment of whether the medium is likely to directly target under 18s.

In summary, CAP considers that the evidence contained in the SchHARR Review is not sufficiently strong as to suggest that the scenarios it outlines, such as a ban on alcohol advertising or tightening existing restrictions on the placement of alcohol advertisements, are merited.

Summary of SchHARR findings in relation to advertising

CAP has considered both parts of the SchHARR Review (Part A and Part B); Part B used the evidence collated in Part A to select policy options and model their potential impact on alcohol consumption and alcohol-related harms.

¹ <http://www.oxfordshiredaat.org/NewPDFs/AHRSE%202004.pdf>

Part A of the SchARR review represented a systematic review of existing evidence relating to various types of alcohol promotions, alcohol pricing, alcohol consumption and alcohol-related harm.

Key findings from Part A in relation to advertising are²:

- Conclusive evidence of a small but consistent association of advertising with consumption at a population level and evidence of small but consistent effects of advertising on consumption of alcohol by young people at an individual level.
- A continuing methodological debate on how advertising effects can and should be investigated: further research and methodologies for establishing a definite causal relationship are required.
- Some inconclusive evidence suggests that advertising bans have a positive effect in reducing consumption. Differences in contextual factors are a likely explanation for those differences. It is methodologically challenging to control for all possible confounding factors.
- Some evidence suggests that bans have an additive effect when accompanied by other measures within a general environment of restrictive measures.

Part B used the evidence collated in Part A to select policy options and model their potential impact on alcohol consumption and alcohol-related harms.

The sections of the study that relate to advertising were inconclusive. These remarks appear in the Executive Summary:

- The study contains exploratory analyses of the potential impact of restrictions on advertising (in particular focused on the proportion of advertising space or time that is devoted to public health messages and on reducing exposure to advertising for under-18s). There exists substantial uncertainty in the available evidence and there is a need for further research.³
- There exists disagreement in the academic research literature on whether advertising bans (in the absence of other legislation) reduce alcohol consumption or increase it (by having the unintended side-effect of increased price competition between competitors).⁴

The advertising-related questions that the review considered were:

Q4. What are the likely effects of introducing **restrictions on the advertising of alcohol** on alcohol consumption, alcohol sales, health harms, crime and employment?

Q5 What are the likely effects of introducing **health or educational messages** on alcohol consumptions, sales, health harms, crime and employment?

² Evidence statements taken from pages 82 – 88 of Part A, SchARR review.

³ P. 2, Part B, SchARR review.

⁴ P. 11, Part B, SchARR review.

The review uses two methodologies to consider the effect of advertising on alcohol consumption and recognises that both are flawed. Because of that, it adopted an exploratory approach and reported on the smallest and largest potential effects. Also, data limitations have prevented an in-depth analysis of time-based restrictions.⁵

The review includes three modeling scenarios relating to advertising⁶:

i) Effects of proposals to include public-health-based messages in 1/6th of advertising

This section suggests that general benefits to society could be achieved by requiring 1/6th of alcohol advertising across all media to be replaced by public-health-based messages but the figures vary substantially depending on the variables applied. It assumes that no benefit is derived from the public health message itself but solely from the fact that, assuming advertisers maintain their present budgets, exposure to alcohol advertising would be reduced. It acknowledges “a large degree of uncertainty around the appropriateness of this assumption”. It does not differentiate between mandatory end-frames for all alcohol advertisements and replacing 1/6th of alcohol advertisements with separate media space for health-based messages, nor does it discuss how such a scenario could be implemented.

ii) Eliminating exposure of under-18s to TV-based advertising

This section suggests that tighter restrictions on exposure of under-18s to TV alcohol advertisements might reduce alcohol consumption and alcohol-related harms, again with substantial variations to the predicted impact depending on the figures applied. The conclusion acknowledges “the uncertainty concerning the potential for actually implementing a total elimination of exposure to TV advertising for the under-18s”⁷. In practice, stopping under-18s seeing TV alcohol advertisements without implementing a full ban on TV alcohol advertising would be difficult. The economic impact of such a comprehensive ban has not been explored.

iii) Complete advertising ban

The results suggest there could be some benefit to society of implementing such a ban but the impact on alcohol consumption and financial savings to society is unclear; the review does not explore the economic impact on the media industry. Some of the evidence cited suggests that consumption, and thus harm, could increase as a result of a total ban because suppliers could compete for market share by lowering prices. Again, the findings suggest that more detailed, UK-based research would need to be carried out before robust conclusions can be reached.

CAP's analysis of the SchARR findings

Although Part A of the SchARR review begins to draw some links between alcohol advertising and increased consumption, the evidence statements that relate to advertising are markedly equivocal, especially when compared with those that deal with pricing policies. Because of a

⁵ P. 28, Part B, SchARR review.

⁶ P. 158 – 163, Part B, SchARR review

⁷ P 162, Part B, SchARR review

paucity of available data, Part B is unable to explore fully the evidence statements given in Part A in relation to advertising and is limited to exploring three policy scenarios: again, the outcomes show that not enough evidence is available to draw clear conclusions.

The scenarios outlined in Part B deal primarily with issues around the scheduling or placement of advertisements, not the content of them; the absence of strong evidence that any of those scenarios could have a significant impact on harmful alcohol consumption makes it difficult to consider the benefits of modifying the present placement or content restrictions.

CAP's conclusions

In so far as the ScHARR review relates to advertisements, it does not offer persuasive evidence to support a proposal to further strengthen the alcohol advertising rules, indeed it calls for more in-depth research to be carried out.

Question 75

Given CAP's policy consideration, do you agree that the evidence contained in the ScHARR Review does not merit a change to CAP's alcohol advertising content or scheduling rules? If your answer is no, please explain why you consider the ScHARR Review does merit a change to CAP's alcohol advertising content or scheduling rules.

BCAP ScHARR review analysis – Code Review Consultation Addendum

The Independent Review of the Effects of Alcohol Pricing and Promotion published by the School of Health and Related Research at the University of Sheffield (ScHARR)

Please note:

This is an addendum to the BCAP Code Review and should be read in association with the Introductory sections (Part 1) of the BCAP consultation document, as well as Sections 19 (Alcohol) and 32 (Scheduling).

Responses to the question below are invited by 5pm on 10 July 2009. Please see Annex 3 of the BCAP Code Review for details about how to respond to this consultation

Introduction

On page 18 of the Department of Health's *Safe, Sensible, Social* consultation, the Secretary of State for Culture Media and Sport asked CAP and BCAP to take into account, as part of the CAP and BCAP Code Reviews, the findings of the Independent Review of the Effects of Alcohol Pricing and Promotion conducted by Sheffield University ('the ScHARR Review'), which considered the relationship between the price and promotion of alcohol and alcohol-related

harm. The SchHARR Review can be accessed here http://www.dh.gov.uk/en/Consultations/Liveconsultations/DH_086412

In October 2008, CAP and BCAP informed the Secretary of State that the Review's proposed publication date would not allow sufficient time for the Committees to consider the findings as part of their Code Review. CAP and BCAP undertook, however, to review the findings at the earliest possible opportunity in 2009. The Government accepted that approach.

The SchHARR Review was published on 3 December 2008. The review is broad, covering tax and pricing, the effect of alcohol consumption on health and, of relevance to the BCAP Code Review, findings on the relationship between alcohol advertising and increased consumption; it set out to explore the potential impact of restrictions on the scheduling of alcohol advertisements, including a ban on alcohol advertising. The SchHARR Review does not contain findings on the relationship between the creative content of alcohol advertising and increased consumption. BCAP's review of rules on the creative content of alcohol advertisements is presented in Section 19 of the BCAP Code Review consultation.

Background

In March 2004, the Prime Minister's Strategy Unit published the Alcohol Harm Reduction Strategy for England⁸, which called on Ofcom to oversee a fundamental review of the content rules for the broadcast advertising of alcohol. Ofcom's review led to a strengthening of the alcohol advertising rules: reducing the appeal of alcohol advertising to those aged under 18 and restricting sexual content in alcohol advertisements⁹.

The Alcohol Harm Reduction Strategy concluded, 'There is no clear case on the effect of advertising on behaviour. One recent study suggests that such an effect may exist, but is contradicted by others which find no such case. So the evidence is not sufficiently strong to suggest that measures such as a ban on advertising or tightening existing restrictions about scheduling should be imposed by regulation.' (page 33)

BCAP has considered whether the evidence contained in the SchHARR Review is sufficiently strong to suggest that the scenarios it outlines, such as a ban on alcohol advertising or tightening existing scheduling restrictions, may be merited. Presently, TV and radio advertisements for alcohol must not be scheduled in or around programmes of particular appeal to people aged under 18; the ASA may determine particular appeal of a programme using objective data or, if that is not available, a qualitative assessment of, for example, the content of the programme or its place in the broadcast schedule.

In summary, BCAP considers that the evidence contained in the SchHARR Review is not sufficiently strong as to suggest that the scenarios it outlines, such as a ban on alcohol advertising or tightening existing scheduling restrictions, are merited.

⁸ <http://www.oxfordshiredaat.org/NewPDFs/AHRSE%202004.pdf>

⁹ <http://www.ofcom.org.uk/consult/condocs/AlcAds/decision/>

Summary of SchARR findings in relation to advertising

BCAP has considered both parts of the SchARR Review (Part A and Part B); Part B used the evidence collated in Part A to select policy options and model their potential impact on alcohol consumption and alcohol-related harms.

Part A of the SchARR review represented a systematic review of existing evidence relating to various types of alcohol promotions, alcohol pricing, alcohol consumption and alcohol-related harm.

Key findings from Part A in relation to broadcast advertising are¹⁰:

- Conclusive evidence of a small but consistent association of advertising with consumption at a population level and evidence of small but consistent effects of advertising on consumption of alcohol by young people at an individual level.
- A continuing methodological debate on how advertising effects can and should be investigated: further research and methodologies for establishing a definite causal relationship are required.
- Consistent evidence from longitudinal studies that exposure to TV and other broadcast media¹¹ is associated with inception of and levels of drinking. Evidence for the effect of watching videos is equivocal.
- Some inconclusive evidence suggests that advertising bans have a positive effect in reducing consumption. Differences in contextual factors are a likely explanation for those differences. It is methodologically challenging to control for all possible confounding factors.
- Some evidence suggests that bans have an additive effect when accompanied by other measures within a general environment of restrictive measures.

Part B used the evidence collated in Part A to select policy options and model their potential impact on alcohol consumption and alcohol-related harms.

The sections of the study that relate to advertising were inconclusive. These remarks appear in the Executive Summary:

- The study contains exploratory analyses of the potential impact of restrictions on advertising (in particular focused on the proportion of advertising space or time that is devoted to public health messages and on reducing exposure to advertising for under-18s). There exists substantial uncertainty in the available evidence and there is a need for further research.¹²

¹⁰ Evidence statements taken from pages 82 – 88 of Part A, SchARR review.

¹¹ no distinction is made here between advertising and programming.

¹² P. 2, Part B, SchARR review.

- There exists disagreement in the academic research literature on whether advertising bans (in the absence of other legislation) reduce alcohol consumption or increase it (by having the unintended side-effect of increased price competition between competitors).¹³

The advertising-related questions that the review considered were:

Q4. What are the likely effects of introducing **restrictions on the advertising of alcohol** on alcohol consumption, alcohol sales, health harms, crime and employment?

Q5 What are the likely effects of introducing **health or educational messages** on alcohol consumptions, sales, health harms, crime and employment?

The review uses two methodologies to consider the effect of advertising on alcohol consumption and recognises that both are flawed. Because of that, it adopted an exploratory approach and reported on the smallest and largest potential effects. Also, data limitations have prevented an in-depth analysis of time-based restrictions.¹⁴

The Review includes three modelling scenarios relating to advertising¹⁵:

i) Effects of proposals to include public-health-based messages in 1/6th of advertising

This section suggests that general benefits to society could be achieved by requiring 1/6th of alcohol advertising across all media to be replaced by public-health-based messages but the figures vary substantially depending on the variables applied. It assumes that no benefit is derived from the public health message itself but solely from the fact that, assuming advertisers maintain their present budgets, exposure to alcohol advertising would be reduced. It acknowledges “a large degree of uncertainty around the appropriateness of this assumption”. It does not differentiate between mandatory end-frames for all alcohol advertisements and replacing 1/6th of alcohol advertisements with separate media space for health-based messages, nor does it discuss how such a scenario could be implemented.

ii) Eliminating exposure of under-18s to TV-based advertising

This section suggests that tighter restrictions on exposure of under-18s to TV alcohol advertisements might reduce alcohol consumption and alcohol-related harms, again with substantial variations to the predicted impact depending on the figures applied. The conclusion acknowledges “the uncertainty concerning the potential for actually implementing a total elimination of exposure to TV advertising for the under-18s”¹⁶. In practice, stopping under-18s seeing TV alcohol advertisements without implementing a full ban on TV alcohol advertising would be difficult. The economic impact of such a comprehensive ban has not been explored.

iii) Complete advertising ban

¹³ P. 11, Part B, ScHARR review.

¹⁴ P. 28, Part B, ScHARR review.

¹⁵ P. 158 – 163, Part B, ScHARR review

¹⁶ P 162, Part B, ScHARR review

The results suggest there could be some benefit to society of implementing such a ban but the impact on alcohol consumption and financial savings to society is unclear; the review does not explore the economic impact on the media industry. Some of the evidence cited suggests that consumption, and thus harm, could increase as a result of a total ban because suppliers could compete for market share by lowering prices. Again, the findings suggest that more detailed, UK-based research would need to be carried out before robust conclusions can be reached.

BCAP's analysis of the SchARR findings

Although Part A of the SchARR review begins to draw some links between alcohol advertising and increased consumption, the evidence statements that relate to advertising are markedly equivocal, especially when compared with those that deal with pricing policies. Because of a paucity of available data, Part B is unable to explore fully the evidence statements given in Part A in relation to advertising and is limited to exploring three policy scenarios: again, the outcomes show that not enough evidence is available to draw clear conclusions.

The scenarios outlined in Part B deal primarily with issues around the scheduling or placement of advertisements, not the content of them; the absence of strong evidence that any of those scenarios could have a significant impact on harmful alcohol consumption makes it difficult to consider the benefits of modifying the present placement or content restrictions.

BCAP's conclusions

In so far as the SchARR review relates to advertisements, it does not offer persuasive evidence to support a proposal to further strengthen the alcohol advertising rules, indeed it calls for more in-depth research to be carried out.

Question 158

Given BCAP's policy consideration, do you agree that the evidence contained in the SchARR Review does not merit a change to BCAP's alcohol advertising content or scheduling rules? If your answer is no, please explain why you consider the SchARR Review does merit a change to BCAP's alcohol advertising content or scheduling rules.