

“Routes to Magic”

**The Alcoholic Beverage Industry’s Use of
New Media in Alcohol Marketing**

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1.0 INTRODUCTION

Despite a considerable body of research evidence which highlights the nature and extent of alcohol related harm, it is estimated that the UK alcohol industry spends as much as £800m per year on marketing communications to promote the sale of alcohol.¹ As part of its 2009 investigation into the conduct of the UK alcohol industry, the House of Commons Health Select Committee (HSC) obtained access to internal marketing documents from both producers and their advertising agencies. The Institute for Social Marketing (ISM) at the University of Stirling and the Open University was asked by the HSC to analyse these documents and assess how they fitted with the self-regulatory codes on alcohol advertising. In analysing these documents, it was apparent that there has been a rapid growth in the use of new media (ie. digital forms of communication such as the internet, mobile devices, electronic games, blogs and podcasting) to market alcohol in recent years, yet this is an area which presents particular challenges to the current system of self-regulation.² This report examines the use of new media to market leading alcohol brands in the UK using a case study approach.

This study was commissioned by Scottish Health Action on Alcohol Problems (SHAAP). SHAAP was established by the Scottish Medical Royal Colleges and Faculties to raise awareness about the high levels of alcohol harm in Scotland and to advocate for evidence-based solutions to reduce this harm. One of SHAAP's strategic objectives is to promote the public health case for protecting young people from experiencing alcohol-related harm.

Acknowledgements

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2.0 POLICY CONTEXT

2.1 Alcohol Related Harm

Considerable evidence about alcohol related harm exists at a global, national and local level. At a global level, harmful alcohol use is understood to be a major risk factor for poor health. The World Health Organization (WHO) estimates that there are approximately 2 billion people worldwide who consume alcoholic beverages and 76.3 million with diagnosable alcohol use disorders. More specifically, there is a causal relationship between alcohol consumption and more than 60 types of disease and injury.³ In addition to the detrimental effect of alcohol consumption on physical and mental health, the social consequences of high and increasing alcohol consumption is a matter of public concern.

In the UK, alcohol consumption has more than doubled in the past 60 years, with a notable increase occurring since the early 1990s. Increased levels of alcohol misuse have accompanied increased levels of consumption. Over a third (37%) of those over the age of 16 now report consumption levels which exceed the UK recommended guidelines.⁴ Increased alcohol consumption has brought about a corresponding increase in alcohol related harm and significant concern exists in the UK about high levels of alcohol consumption in terms of the detrimental impact that it may have for health⁵ and social order.⁶ Particular concern exists in relation to increasing levels of alcohol consumption amongst young people and a 'culture of intoxication'.⁷ There is a growing body of research evidence which highlights the particularly detrimental effects of alcohol on young people's mental health⁸ and physical development⁹ coupled with increased risk of harms such as violence, suicide and sexually transmitted diseases.¹⁰

In keeping with trends elsewhere, there is a growing evidence base which highlights alcohol misuse in Scotland as a significant health, social and economic problem. It is acknowledged that levels of alcohol related harm in Scotland are high and increasing.¹¹ In 2007-2008, for example, over 40,000 hospital discharges resulted from alcohol related illness and injury, representing an increase of almost 10% in the last 5 years.¹² Meanwhile, alcohol related mortality has increased by 75% in the past decade.¹³ There are also significant social and economic costs of alcohol misuse in Scotland, with alcohol misuse costing Scotland an estimated £2.25 billion each year.¹⁴

2.2 Concern about Alcohol Marketing

Alcohol misuse is commonly understood to be an individual problem, however it is important to understand and respond to alcohol related harm at a societal level. One aspect of this process involves acknowledging the link between increased alcohol related harm and the increased affordability, availability and promotion of alcohol. Numerous consumer studies have examined the relationship between advertising and young people's attitudes, knowledge and behaviour in relation to alcohol. Three systematic reviews of this body of evidence all point to links between marketing communications and young peoples' drinking behaviours.¹⁵¹⁶¹⁷ More specifically, this work indicates that alcohol advertising and promotion increases both the likelihood that adolescents will start to drink and the amount that they will drink if they already consume alcohol.

The World Health Organisation (WHO) recommends placing restrictions on alcohol advertising and sponsorship as part of a comprehensive strategy to reduce the harmful use of alcohol.¹⁸ Across European countries, a range of statutory and self-regulatory controls on alcohol advertising are in operation. Within the EU, however, the UK is the only country without some form of ban on a specific type of advertising.¹⁹ Measures adopted by France under the 'Loi Evan', for example, include prohibiting alcohol advertising on television or cinemas, and forbidding sponsorship of sports or cultural events by alcohol companies. Meanwhile, Norway has a complete ban on alcohol advertising.

In the UK, the promotion of alcohol is regulated primarily by specific rules which govern the content, rather than the medium or volume of alcohol advertisements. Alcohol advertising rules were tightened in 2005 in response to concern about underage and irresponsible drinking. The stricter rules introduced in 2005 aimed to prevent advertisers from associating alcohol with youth culture, irresponsible behaviour, seduction, sexual activity or sexual success.²⁰

Research by Ofcom and the Advertising Standards Authority (ASA) to assess the impact of alcohol advertising on young people, following the tightening of the Advertising Codes in 2005, concluded that children (10-15 year olds) and young adults (16-24 year olds) were being exposed to fewer alcohol commercials on television.²¹ This research also revealed that there had been a decrease in the proportion of young people who felt alcohol adverts were aimed at them, although there had been an increase in the number of young people saying that adverts made alcoholic drinks appealing and would encourage people to drink them. While these findings suggest that tightening the rules on alcohol advertising may have had some effect on young peoples' exposure to alcohol advertising, it should be noted that this research looked specifically at television advertising. Online advertising expenditure in the UK has now overtaken television advertising expenditure, and online environments are seen as an important means of capturing the increasingly lucrative youth market.²²

The need to tighten restrictions on alcohol advertising in order to protect young people is highlighted by the Scottish Government within its long-term strategy for tackling alcohol misuse, *Changing Scotland's Relationship with Alcohol: A Framework for Action*. Although the power to implement this legislative change is reserved to Westminster, the Scottish Government emphasise the recent rise in online (i.e. new media) alcohol advertising as an area requiring urgent action due to the inadequacy of current regulations.²³

3.0 NEW MEDIA MARKETING

New media refers to digital forms of communication such as the internet, mobile devices, electronic games, blogs and podcasting. These mediums are fast-growing and rapidly evolving channels for marketing communications, which represent a departure from traditional forms of media (e.g. print, radio and television). New media offer advertisers a range of innovative and powerful channels to interact with consumers. These channels (e.g. text messages, social networking or blogging sites) are recognised as having particular appeal to young people.

The World Advertising Research Centre reported that drinks companies increased their web expenditure by 70% in 2007,²⁴ and despite the recent economic downturn, it was anticipated that internet advertising expenditure would continue to grow in 2009 while expenditure on more traditional forms of advertising would decline.²⁵ In the UK, the 2008 Alcoholic Drinks Advertisements Compliance Survey by the ASA reported that the volume of online alcohol adverts had almost doubled since the previous year, indicating a significant growth in alcoholic adverts using this medium.²⁶ In September 2009, online advertising expenditure in the UK was reported to have overtaken television advertising for the first time, making the internet the single biggest advertising medium in the UK. In the first six months of 2009, online advertising expenditure increased by £82 million to reach £1.75 billion.²⁷

During oral evidence taken before the Health Select Committee on Alcohol on the 9th July 2009, representatives from digital communications agencies were questioned about their use of new media. The burgeoning use of new media within advertising is highlighted by Mr Gill of Five by Five (digital communications agency for WKD):

Q620 Chairman: ...Could you please explain to us what is meant by “new media” and how do you use this to advertise alcoholic drinks?

Mr Gill: New media is basically digital communications. Digital has been around since circa 1991 but has really escalated in the last ten years in terms of an advertising medium. To give a sense of scale in terms of the amount of money that is spent in the advertising industry, in 2008, which are the latest figures released by IAB, the amount spent on advertising was 3.3 billion, which was up 17% year-on-year versus 2007. On an advertising aspect it is down to search, display advertising, classified and email. Again, to give that a sense of scale, the total advertising for the UK last year was 17.5 billion. Digital represents 19.2% of that with only TV slightly ahead of it on 21.9%. It is predicted that digital will actually outspend TV, if not in the next 12 months, certainly in the next 24. It has overtaken other traditional media channels such as radio and the press, already, just to give you a sense of scale of what it is.²⁸

However, it is important to note that new media is not simply replacing traditional media marketing channels, it compliments and extends these existing channels. On the WKD brand website for example, Beverage Brands highlight their £20 million spend on the marketing of WKD and assure customers that they will continue to “*plough our cash*” into it in the year ahead through traditional media, including a new television advertising campaign, a heavyweight national poster campaign, sampling in bars and clubs, sponsorship, university tours, advertising in press and cinema advertising.²⁹

The opportunity to utilise viral marketing techniques is another key factor in the appeal of new media. Viral marketing involves targeting consumers who are likely to pass on brand values and messages to other potential consumers within their social network (e.g. via e-mail or social networking sites). The use of viral techniques to market alcoholic drinks is described during oral evidence taken before the HSC by Mr Constantinou, of the digital communications agency AKQA for Smirnoff, as follows:

Q665 Dr Naysmith: Mr Constantinou, can you explain what “viral marketing” is and how it is used for your campaigns?

Mr Constantinou: Yes, viral marketing, again, has been at the forefront of new media as it has grown over the last few years. It is an opportunity for us to engage with our clients’ consumers. . . we do look for slightly humorous, engaging, compelling content that we can supply to our clients’ consumers to spread the word of mouth around the good brand values of our clients, whether it be Diageo or any other alcohol brand. So it is, in effect, a piece of content that can be passed on from friend to friend and it can multiply the brand values and the knowledge of the brand amongst the target audience.³⁰

In light of these comments and the growing level of expenditure on new media, it is perhaps unsurprising that alcohol brands have been described as becoming, “*increasingly adept at using new media in the marketing mix...*”³¹ Moreover, Beattie McGuinness Bungay (BMB), an advertising agency whose clients include Carling and Diageo, have described digital marketing as “*routes to magic*”.³² However, it is a matter of concern that new media are described by the ASA as, “*the brash new kids on the block*”,³³ which have particular appeal to advertisers due to their versatility, low cost, reach and ability to target specific groups.

4.0 SOCIAL NETWORKING SITES

Social networking has grown rapidly in recent years and is now recognised as a part of mainstream culture.³⁴ Facebook, Bebo and YouTube are the three most popular social networking sites in the UK.³⁵ Facebook was founded in 2004 and is now the largest social networking site in the world.³⁶ The following year, Bebo and YouTube (a video sharing site) were launched. Social networking sites allow users to create a personal page or profile which includes information such as their geographical location, personal interests, photos and links to their online friends. These pages may also facilitate online discussion groups, file sharing and blogging. Although many adults use social networking sites, research suggests that online social networking is considered to be an important part of youth culture which facilitates participation in a peer network and the development of social identity.³⁷

However, social networking sites have been described as a highly commodified enterprise, with substantial revenues being generated from social networking advertisements.³⁸ Although there is some variation in the format of different social networking sites, a key feature of these sites, from a marketing perspective, is the capacity for companies to buy advertising space on these sites (e.g. in the form of banner or pop-up ads), and use free features of the sites to promote their products. By setting up a 'page' on a social networking site, alcohol producers can promote their products free of charge and encourage users to become 'fans' of their pages. Users can also set up alcohol related 'groups' on social networking sites, generating content for these pages by posting comments, uploading photos and videos and inviting friends to join their groups.

5.0 REGULATION OF ALCOHOL MARKETING IN THE UK

The Advertising Standards Authority (ASA) is the UK self-regulatory body for maintaining standards in advertising, as laid down in the advertising codes (CAP Codes). The ASA investigates complaints and regulates the content of advertisements, sales promotions and direct marketing in the UK. The advertising industry takes responsibility for writing the advertising standards codes and enforcing ASA rulings through the Committee of Advertising Practice (CAP), which represents the main industry bodies including advertisers, agencies and media owners.

The regulation of UK internet advertising began in 1995 when the 9th edition of the Codes extended the ASA's remit to include advertisements in 'non-broadcast electronic media'.³⁹ The use of new media for marketing activities is regulated by the British Code of Advertising, Sales Promotion and Direct Marketing (separate codes exist for television and radio advertising). The rules which currently govern alcohol advertising, as they apply to new media, are set out within the CAP Code summarised below.

Alcoholic drink advertising must not:

- Encourage people to adopt styles of drinking which are unwise.
- Encourage excessive drinking.
- Suggest that alcohol can overcome boredom, loneliness or other problems.
- Suggest that alcohol might be indispensable.
- Exploit the young, the immature or those who are mentally or socially vulnerable.
- Be directed at people under 18.
- Use any medium if more than 25% of its audience is under 18.
- Show people drinking or playing a significant role if they are, or look, under 25 years and should not be shown behaving in an adolescent or juvenile way.
- Be associated with people under 18 or reflect their culture.
- Feature or portray real or fictitious characters who are likely to appeal to people under 18.
- Suggest that any alcoholic drink has therapeutic qualities, can enhance mood, confidence, popularity, personal qualities, performance or sporting achievements.
- Link alcoholic drinks to illicit drugs.
- Link alcoholic drinks to sexual success or be advertised in the context of sexual activity or seduction.
- Imply that alcohol can enhance attractiveness, masculinity or femininity.
- Suggest that a drink is preferred because of its alcoholic content or strength.
- Suggest that the success of a social occasion depends upon alcohol.
- Imply that drinking is essential to social success or acceptance, or that refusal is a sign of weakness.
- Link alcohol with daringness, bravado, toughness, aggression or anti-social behaviour.
- Depict activities or locations which drinking alcohol would be unsafe or unwise.

The diverse and rapidly evolving nature of new media presents a particular challenge to effectively monitoring and regulating the marketing activities of the alcohol industry.

The following forms of new media fall within the remit of the ASA:

- Ads in paid-for space (banner ads, pop-ups etc).
- Advertising content in commercial e-mails.
- Sales promotions wherever they appear online.
- Commercial text messages.
- Viral marketing e-mails.
- Paid-for entries in search engine results.
- Ads on electronic kiosks and billboards.
- Ads in electronic games.
- Use of e-mail addresses for marketing purposes (e.g. spam).

It is noteworthy that the editorial content of company websites, pages on social networking sites and personal e-mails is beyond the remit of the ASA, yet corporate websites are an area which Christopher Graham, ASA Director General, has noted “*a significant amount of problematic promotions*”⁴⁰ take place.

In October 2009 the Portman Group published ‘*The Responsible Marketing of Alcoholic Drinks in Digital Media*’, which offers alcohol companies guidance on how to comply with Portman Groups Code of Practice and the CAP Code when using new media to engage with consumers. This guidance reflects the key principles outlined by the CAP Code although it goes beyond the remit of the ASA since it applies to brand websites, material placed free-of-charge on third party websites (e.g. social networking sites and video sharing sites), and user generated content on websites controlled by the drinks producer. In effect, the Portman Group guidance on digital media applies to any internet communication used by a drinks producer to promote an alcoholic drink, which falls out with the remit of the ASA and the associated CAP Code. It should be noted, however, that although the Portman Guidelines apply to a broader range of media than the CAP Code, this guidance remains part of a system of self-regulation by the alcohol industry. Recent research highlights the inadequacies of this system of self-regulation, suggesting that it is vulnerable to exploitation by alcohol producers and their advertising agencies.⁴¹

6.0 METHODOLOGY

The UK drinks market contains a wide range of alcohol brands and drink sectors. For the purpose of this report four brands (WKD, Lambrini, Smirnoff and Carling) were selected for in-depth analysis of aspects of their new media marketing activities. These brands were drawn from the sample chosen by the Health Select Committee on Alcohol for its 2009 investigation. The selection of these brands was not made on the basis that they exemplify good or bad practice, rather that they represent leading brands from a cross-section of drink sectors (i.e. ready-to-drink, perry, spirits, and lager). Although the information presented in this report is restricted to these four brands, the activities discussed can be considered typical of marketing practice in relation to other alcohol brands and producers.

Adopting a case study approach, the nature and content of new media advertising and marketing used for these alcohol brands was documented and reviewed against the CAP Advertising, Sales Promotion and Direct Marketing Code in relation to alcohol. Given that brand websites and non-paid for space in social networking sites are currently beyond the remit of the ASA, these channels were selected for particular scrutiny. Exploration of each brand website and the mechanisms within these sites used to engage with consumers, therefore, formed a central focus of this analysis.

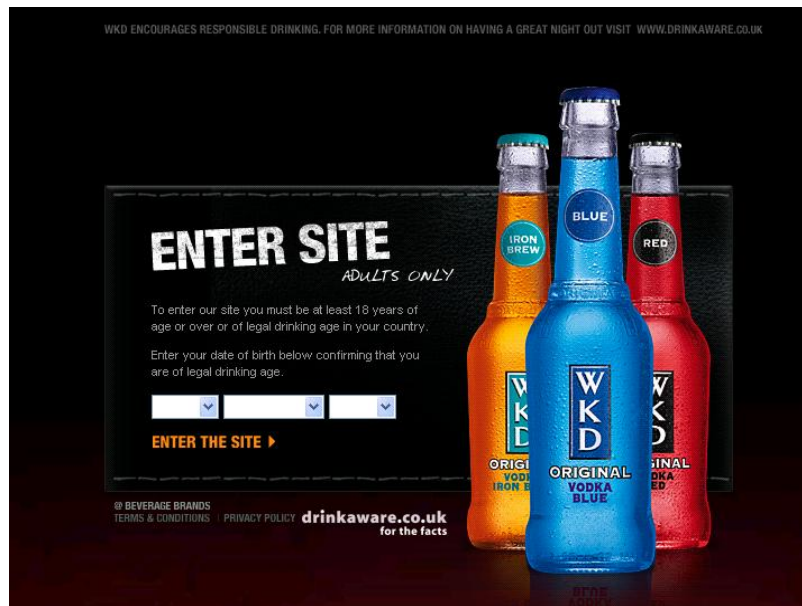
The use of the UK's three most popular social networking sites (ie. Facebook, Bebo and YouTube)⁴² by alcohol producers and consumers was also examined. Within these social networking sites, keyword searches were conducted using the four alcohol brand names outlined above. Due to the volume of the results generated by these searches, only the most popular and relevant search results are presented within this report. Nonetheless, the results presented provide a valuable insight into the nature and content of alcohol brand related content on social networking sites. Particular attention was given to any official brand pages on social networking sites, although examples of brand related pages and groups created by users were also reviewed. Indeed, it was often difficult to differentiate between official and user generated content on these sites.

Prior to presenting findings for each alcohol brand in relation to their own websites and social networking sites, the age restrictions which apply across these sites is outlined in Section 7.1.

7.0 FINDINGS

7.1 Age Restrictions

All four alcohol brand websites require visitors to enter their date of birth in an age verification page before being allowed access to the site. The age verification page for WKD is illustrated below:



<http://www.wkd.co.uk/pages/agegate> [accessed 4th August 2009]

If visitors enter a date of birth indicating that they are under the age of 18, they are denied access to the alcohol brand website and automatically redirected to responsible drinking sites. Visitors to the WKD, Lambrini and Carling websites are redirected to the Drinkaware website. In the case of Smirnoff, they are automatically directed to the homepage for the Century Council, a US based website set up by distillers to tackle drunk driving and underage drinking. However, the information contained within this website is of limited value to UK visitors since the resources are specific to the US.

The effectiveness of these age verification processes is questionable since there is nothing to prevent underage users from entering a fictitious date of birth. Further, all four alcohol brand websites allow access to their sites when a date which does not exist is entered (i.e. 29th February on a leap year). When questioned about this deficiency during oral evidence taken by the HSC, Mr Gill, representing the digital communications agency Five by Five for WKD, made the following response:

Q657 Dr Taylor: So you are absolutely happy that nobody under the age of 18 could access this particular field that we have put on page two?

Mr Gill: This is our brand site, WKD.co.uk. Again, that comes back to the age verification page upfront. The Facebook page, again, we actively discourage people.

Q658 Dr Stoate: Can I interrupt there? I have just entered the WKD site with a fake date of birth, 29 February, on a year that was not a leap year, and I am into it

without any trouble at all. Admittedly it is a bit slow, because 3G is not working very well in this room, but I am onto the website with no trouble, and it did not ask me any other details. A fictitious date of birth which did not actually exist and I am on your website no trouble at all. I can go onto all these things: the shop, the arcade, download Kev and Dave, the newsletter. It is not a problem. It did not give me much confidence, and if I had actually been only 12, I would have had no trouble at all getting onto this: it took me a minute.

Mr Gill: Yes, but the age verification process is the accepted standard in the industry.

Q659 Dr Stoate: It is not very effective then, is it? I asked you if it was too lax. I do not think that is very effective.

Mr Gill: If there was a more effective way of doing it, then we as an industry, and not just the alcohol industry, would be employing that. At the moment that is collectively what we believe is the most effective method of doing it.

Dr Stoate: I am not impressed, Chairman.⁴³

Once users have navigated the age verification page on these alcohol brand websites, they then have the option of registering as a member of the site. Again, if users enter a date of birth which means that they are under 18, they would usually receive a message saying that they are not allowed to register with the site, although they still have the option of trying again with an alternative date of birth. However, if users opt to register with the WKD website and enter their date of birth as 01/04/1999 (meaning that the user is ten years old), this site allows registration. By registering with the WKD site, members can access particular features including regular newsletters and competitions to win WKD products.

Social networking sites operate with a minimum age policy as noted in their terms and conditions of use. In the case of Facebook, Bebo and YouTube, users are required to be 13 years old or over before they can register as a member with the site. However, there is nothing to stop children under the age of 13 from accessing the content of social networking sites since registration with the site is not required to view the information available on these sites. The use of social networking sites to promote alcohol is a matter of concern due to the youth appeal of these sites and difficulties associated with enforcing age restrictions.

7.2 WKD

7.2.1 WKD website

A key feature of the WKD website are the interactive fictional characters ‘Kev ‘n’ Dave’, who are presented as friends with a young twenty-something male persona:



<http://www.wkd.co.uk/> [accessed 4th August 2009]

The home page of the WKD brand website is dominated by images of ‘Kev ‘n’ Dave’, portraying them as young ‘lads’. For example, the main image used on the site features Kev ‘n’ Dave in large armchairs in a student style flat with a television showing football in the background and a ‘Rocky’ poster on the wall. Visitors to the site are invited to interact with Kev ‘n’ Dave by “asking them anything”, and there are links to the Kev ‘n’ Dave newsletter and blog. An audio stream accompanies these characters with statements such as “have a butchers at some Irish pussy”, “freshers week, check out the events section”, “mum give us a break, we’re watching the game” and “party time”. Although the CAP Codes stipulate that alcohol advertising must not appeal to youth culture or masculinity these characters would appear to do both of these things.

By registering for the Kev ‘n’ Dave newsletter users receive an e-mail titled, “Hey, you’re one of us now”. It is worth noting here that the CAP Codes regulate against alcohol advertising associating drinking with social success or popularity. From the WKD website there is also an option to send a viral e-mail to a number of friends (who are then invited to send the e-mail on to other friends). The e-mail sent to friends reads “Hey [friend] reckons you need answers. So ask us [Kev ‘n’ Dave] anything”. However, there is no accompanying message to highlight that the friend receiving the e-mail should be aged 18 or over.

The WKD site also features an ‘arcade section’ where users can engage in an interactive football quiz and car building game. The football quiz has a viral element to it since it can be sent to a friend. Other interactive features include an online poll of a current topic (e.g. “What do you think of the latest Big Brother series”) and an online competition to win a

games console (Xbox 360). There is also a link to a BBQ competition, *“All blokes are natural born grillers, Sausages...burgers...steaks..if it moves, barbecue it! The great news is we have everything you and your mates need to have a flamin’ brilliant BBQ! The WKD BBQ booklet is bursting with great offers and free stuff. There’s even a few hot tips on how to have a proper bloke’s BBQ”*. Again, competitions and other interactive features on the WKD website link this brand with masculinity.

Visitors to the WKD site also have the option of viewing WKD television adverts and downloading WKD wallpaper with a range of themes including football, Kev ‘n’ Dave, and kebab jokes. WKD branded MSN icons are also available for download free of charge. These icons can be used to customise users’ profiles on internet messaging forums and social networking sites. In other words, users are provided with alcohol branded material which then allows them to generate alcohol branded content on social networking sites.

7.2.2 Facebook

Conducting a search for the brand name ‘WKD’ returns 13,000 groups and pages on Facebook, with eleven of the pages relating to the alcoholic beverage WKD. The vast majority of these pages and groups are user generated, although there were two official WKD pages (a ‘WKD Ireland’ page with 363 fans and a ‘Ask WKD’s Kev’n’ Dave’⁴⁴ page with 266 fans). The Kev ‘n’ Dave page offers detailed information about these characters such as their date and place of birth, blurring the distinction between real and fictional characters created for an alcohol brand. Dave, for example, is said to be from Essex and is quoted as saying, *“I’ve known Kev since he moved in next door over 20 years ago... we’re like brothers. In fact, I think my Mum loves him more than me”*.⁴⁵

The WKD page with the most fans (25,512), however, was user generated.⁴⁶ Comments posted on the walls of user generated WKD pages and group walls (homepages) clearly promote excessive alcohol consumption (e.g. *“lets get drunk!”* and *“im not a alchaholic. i just LOVE to drink. thanks for beoming a fan x”*). Meanwhile the taglines adopted by the two largest Facebook groups (with 953 and 370 members respectively) are, *“Amazing booze”* and *“da best drink eva, have you got a wkd side haha”*. It is particularly interesting to note the use of the WKD strapline “have you got a WKD side” being promoted by users. Posts on group walls also typically include comments about the amount of the product they have drank, such as *“6 big bottles of WKD on saterday☺sooo good”*.

The official ‘WKD Ireland’ page primarily contains posts relating to WKD promotional giveaways and events (e.g. the WKD wind tunnel tour of festivals and associated photographs from these events). The following exchange on the WKD Ireland Facebook wall relates to the promotional giveaway of WKD merchandise:

WKD Ireland: *“Anyone want a WKD Horny Hat? We have TEN to give to you lovely people! Who could refuse this chick magnet?!!”*

A ‘fan’ asks for a WKD hat to be sent out since they have freshers week starting the following week.

WKD Ireland: *“Of course you can. Crazy freshers are what these hats are MADE for!!!...Post us a pic of you wearing it too!!!”*.⁴⁷

Posts such as these contradict the spirit of the CAP Codes which specify that alcohol adverts should not be linked to youth culture or sexual success. It is difficult to ascertain the age of the fans posting comments on Facebook since such information is usually only available if you are a Facebook friend of that person. However, as with other alcohol brand related pages on social networking sites, some of the photographs uploaded by fans would suggest that they may be under 18 years.

7.2.3 Bebo

Over 600 WKD related groups were identified on Bebo, all of which are user generated. Groups which relate to the WKD brand typically use a WKD branded logo. The following group, for example, use an MSN icon available for download from the official WKD website as the logo for their group:

<http://www.bebo.com/Profile.jsp?MemberId=9234123741&TUUID=d28128a3-1238-4391-8ab9-ac813c0bb9e7>
[accessed 8th January 2010]

The largest group on Bebo, called ‘Lovers of WKD’ is user generated and has 77,703 members. Although age is not always given in a member’s profile, where it is given there are several members under the age of 18. Where no age is given, photographs of members would also suggest that a significant number may be under 18, and images of children in school uniforms are included as members. The second largest WKD group on Bebo ‘What WKD are you?’ has 6,118 application users and is based round a quiz to reveal which flavour of WKD you are most like. The tagline for this group is “*you alcoholics*”, and users are invited to “*join our alcohol lovers group*”.

7.2.4 YouTube

A number of WKD television adverts have been posted on YouTube by users. The popularity of these adverts amongst different demographic groups varies, although YouTube statistics highlight that some of the adverts are most popular with viewers who are under 18 years of age. For example, a ‘Funny WKD advert’ with 19,583 views was most popular with males aged 18-24, followed by females aged 13-17.⁴⁸

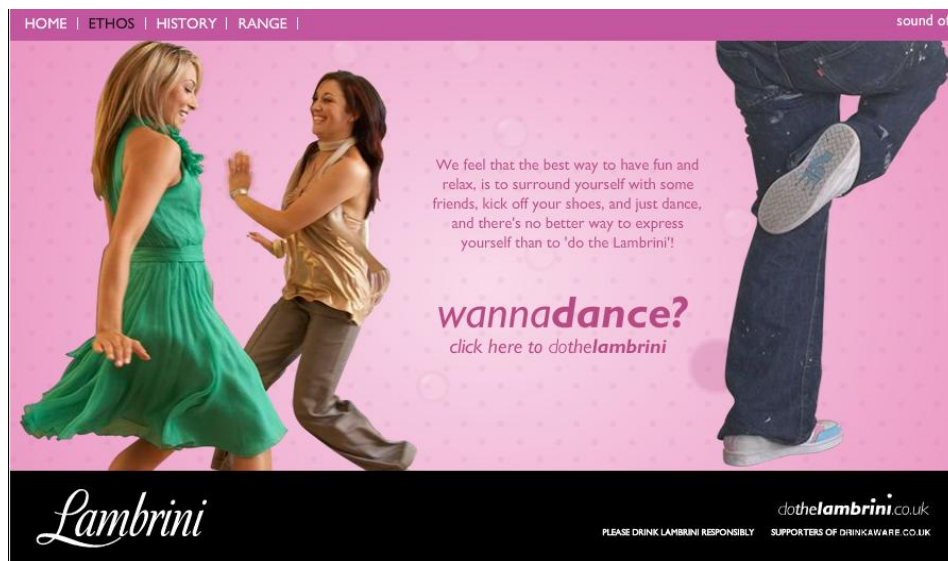
There were also examples of users filming their own WKD adverts and posting them on YouTube. One advert, for example, is described by a user as a, “*new advert for WKD I made with my mates*” showing young men ‘downing’ WKD before going on to a shoot out scene, ending with the strap line “*dream irresponsibly*”.⁴⁹ This homemade commercial had been viewed 24,501 times and was most popular among females aged 13-17, followed by males aged 18-24.

In addition to homemade adverts, there are also numerous examples of users posting clips of themselves or friends downing bottles of WKD. The vast majority of these clips feature young men. The age range varies, although again a number of the clips posted would appear to feature people who look under 18 years of age.

7.3 Lambrini

7.3.1 Lambrini website

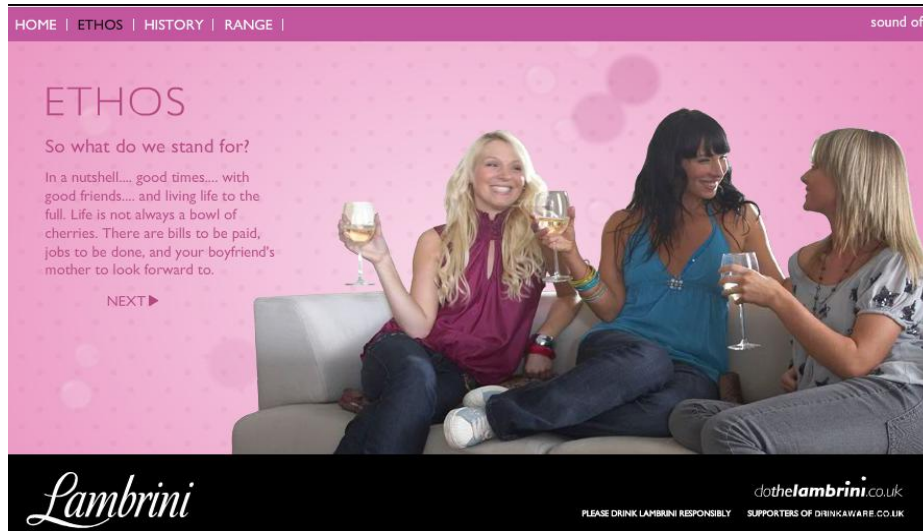
Visitors to the Lambrini website can access information about Lambrini’s ethos, history and product range. Key themes highlighted by the brand ethos are good times, fun, being carefree and female. Visitors are also invited to ‘do the Lambrini’, a jump-style dance created by Lambrini for use in a television advertising campaign with the intention of encouraging consumers to recreate this dance and upload films of them doing the dance to the Lambrini website:



<http://www.lambrini.co.uk/> [accessed 5th August 2009]

By following the ‘do the Lambrini’ link, users are again asked to complete an age verification page before accessing a further range of interactive features, including ‘Lambrini TV’, which allows users to view three difference Lambrini television adverts (‘Release the sparkle with Lambrini’, ‘Do the Lambrini TV’ and ‘Emma Bell Fashion Show’). There is an option to download a range of Lambrini branded materials, including wallpapers and icon packs for messenger profiles, Facebook or mobile phones. The provision of these materials links in to viral marketing techniques, which not only encourage users to adopt brand values and pass these messages on to friends, but also provides users with branded images to use when generating content on social networking sites.

Users are also invited to enter a competition called ‘Desperately Seeking Sparkle’ with a friend in order to win a style makeover. Although these features on the Lambrini website do not directly contravene the CAP Code which prohibits the suggestion that alcohol can enhance femininity, they do appeal to femininity and attractiveness (e.g. through the opportunity to win a ‘style makeover’). The imagery used on the website also makes clear appeals to conventional femininity and female friendship:



<http://www.lambrini.co.uk/> [accessed 5th August 2009]

7.3.2 Facebook

Searching for the term ‘Lambrini’ returns four relevant Facebook pages. One of these pages is an official page while the other three pages are user generated, although it can be difficult to differentiate between official and user generated content. The images below highlight the similarity between these types of page:

Official Lambrini Facebook page

User generated Lambrini Facebook page

The image displays two side-by-side screenshots of Facebook pages. The left page is the official Lambrini Facebook page, featuring a cover photo of a bottle and glass, a 'Wall' section with recent posts, an 'Information' section stating it was founded in 1994, and a 'Fans' section listing 6 of 3,516 fans. The right page is a user-generated page for 'CHERRY LAMBRINI', also with a cover photo of a bottle, a 'Wall' section with posts, an 'Information' section stating it was founded in 2008, and a 'Fans' section listing 6 of 2,945 fans.

<http://www.facebook.com/search/?q=Lambrini&init=quick#/Lambrini?ref=search&sid=1746840362.677998686..1> [accessed 8th January 2010]

<http://www.facebook.com/search/?q=Lambrini&init=quick#/pages/CHERRY-LAMBRINI/17132757692?v=wall&ref=search> [accessed 8th January 2010]

The official Lambrini page has 3,516 fans and in the company overview provided, Lambrini is described as *“the nation’s favourite sparkling wine-style drink”* and *“as a statement of its success, the Original Lambrini has been joined by a succession of brand extensions”*. The CAP Code states that alcohol advertising must not suggest that alcohol can enhance femininity, the success of a social event or mood. However, information on this page goes on to state that, *“The Lambrini brand is all about a celebration of being female, carefree and up for some fun. It stands for having good times with good friends and making the most of life... Available in a cute 275ml bottle, standard 75cl and whopping 150cl magnum, there is a bottle to suit every occasion”*.

Users are invited to take part in the ‘Do the Lambrini’ competition to win a style makeover for a nominated friend.⁵⁰ If users choose to nominate a friend for this competition, the following message appears: *“Allowing Win Lambrini Sparkle access will let it access your Profile information, photos, your friends’ info and other content that it requires to work”*. In other words, such competitions offer alcohol producers easy access to their target market.

The three user generated Lambrini pages are titled ‘Lambrini Cherry’, ‘Lambrini makes me stupid’ and ‘Lambrini and Lambrella and Mad Dog 20/20 are the way forward!’ The ‘Lambrini Cherry’ page, with 2,582 fans includes the following statement:

“We all know Lambrini is the cheap drink of rogues, but when Cherry Lambrini hit our shelves and I discovered it one night, it has since been a firm favourite amongst friends before a night out, and after a night out, it is the perfect sessioning drink”.⁵¹

As with other alcohol brands, information posted by consumers on this site celebrates and promotes the irresponsible consumption of alcohol.

7.3.3 Bebo

Searching for ‘Lambrini’ on Bebo generates 927 results, grouped into six categories: people, videos, music, groups and games/applications.⁵² Users can access video clips of the ‘Do the Lambrini’ television advert and a range of self filmed video-clips with titles such as “*Me doing stupid shots of Lambrini...already wrecked! Lol*” and “*Down a bottle of Lambrini in 3mins*”. There are also 43 Lambrini related groups on Bebo, such as ‘Lambrini girl crew’, who describe themselves as “*a group of gurlis who like t get pissed of lambrini woop*”, and ‘Lambrini Lovers’ who ask, “*Had A Hard Day At Work? School/ College Stressing You Out? Mum On Your Back? Or You Just Wana Get Totally Hammered? Lambrini Is The Solution! Dont Hold Back*”. It is interesting to note users describing themselves as ‘Lambrini Girls’, demonstrating how consumers integrate brand names and values as part of their social identity. There is also one Lambrini related application on Bebo with 1,123 users. The application, ‘Which Lambrini are you?’ is a quiz which invites users to find out which type of Lambrini they are.

7.3.4 YouTube

A range of Lambrini video clips can be found on YouTube. The most popular clip with 81,386 views features the ‘Do the Lambrini’ television advert although this clip is posted by a user rather than Lambrini.⁵³ It is concerning to note that, according to YouTube statistics, this clip is most popular with 13-17 year old girls (followed by 35-44 and 45-54 year old men). The youth appeal of Lambrini is highlighted by comments about this video posted by users: “*me and my mate always giggle at this advert because we always share a bottle of lambrini when we have a girls night out as a blast from the past from our misguided youth!*”.

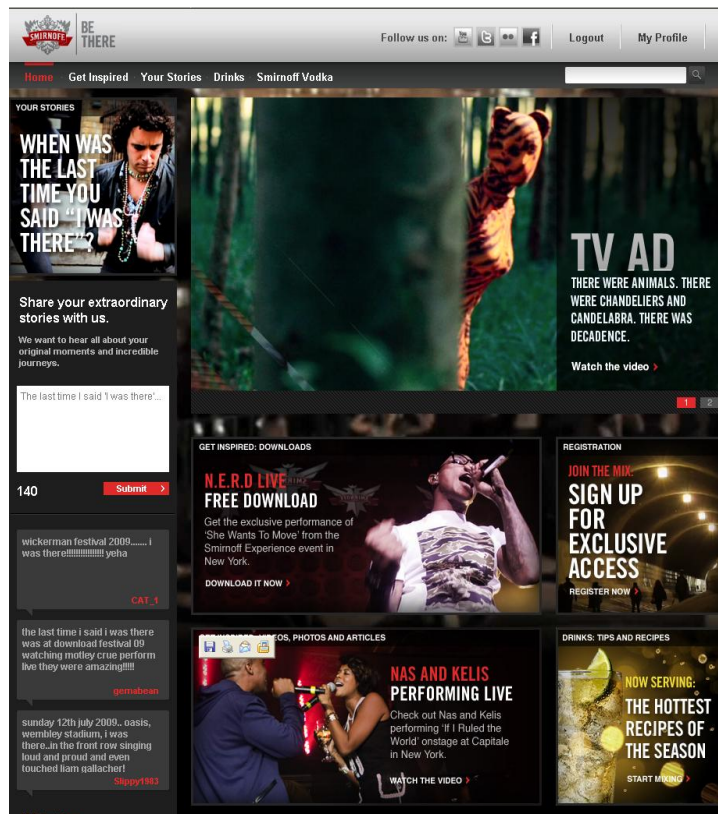
YouTube also features self-filmed videos of users ‘doing the Lambrini’, with clips such as ‘Do the Lambrini! Onskoolstyle ;]’ featuring young women dancing in a garden. Again, this clip is most popular with 13-17 year old girls and it is accompanied by the caption “*Fun, drunkenness at a party. DUTCH FTW! LAMBRINI GIRLS, just wanna have fun*”. It is particularly interesting to note here, the use of the ‘Lambrini Girls Just Wanna Have Fun’ strap line, which Lambrini is no longer allowed to use since it would breach CAP Codes in relation to youth appeal. This is also a clear example of the viral marketing process whereby consumers pass on brand values to their peers.

7.4 Smirnoff

7.4.1 Smirnoff websites

The homepage of the Smirnoff website allows visitors to access a wide range of information about Smirnoff brands, the opportunity to engage with interactive features on the site and direct links to a Smirnoff page or channel on the social networking sites YouTube, Twitter, Flickr and Facebook. Users are encouraged to ‘get inspired’ by downloading music videos such as N.E.R.D’s live performance at a ‘Smirnoff Experience’ event in New York.

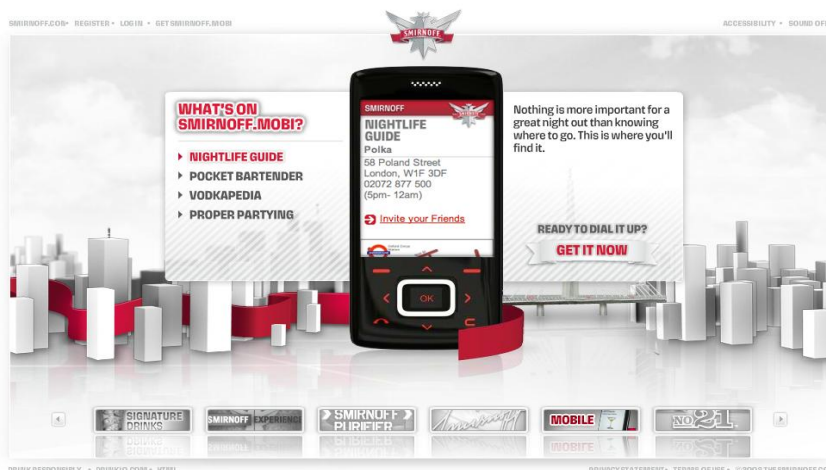
Smirnoff-based cocktail recipes, described as “*the hottest recipes of the season*” are also available:



<https://there.smirnoff.com> [accessed 6th August 2009]

Users are also encouraged to play an interactive game called ‘Smirnoff purifier’ by being offered the opportunity to win a year’s supply of Smirnoff and a cocktail kit. There is also the option to download cocktail recipe book wallpaper and screensavers, or share recipes with friends simply by clicking on a ‘share’ icon, which provides a direct link to e-mail and social networking sites such as Facebook, Bebo and Twitter. Again, users are provided with alcohol branded material which they are encouraged to circulate through their social networks.

By accessing ‘Smirnoff Mobile’ consumers can receive messages on their mobile phone including features called the ‘pocket bartender’ with drinks recipes, ‘vodkapedia’ for vodka facts, and ‘proper partying’ safety advice:



http://www3.smirnoff.com/en-row/Home/home.htm?rhmonth=1&rhday=1&locale=en_GB
[accessed 6th August 2009]

A 'nightlife guide' can also be sent to users' mobile phones, which again includes a viral option to pass this message onto friends. Particular emphasis is given to interactive features which allow users to share their experiences with the Smirnoff 'community' by posting micro blogging messages on 'your stories'. The 'your stories' section of the Smirnoff website is described as being *"home to all the latest videos and photos of extraordinary moments submitted by our community"* where users can, *"Discover incredible stories, share your ideas and re-live some unforgettable experiences from co-conspirators around the world."*

The CAP Code prohibits advertising from making the suggestion that alcohol is indispensable or that the success of a social occasion is dependent on alcohol, yet the promotion of the 'Smirnoff experience' positions Smirnoff as central to having *"unforgettable experiences"* and *"incredible stories"* to share with others. The 'pocket bartender' and the 'nightlife guide' also position the Smirnoff brand as an important feature of a successful night out.

7.4.2 Facebook

Smirnoff has an official page on Facebook called 'Smirnoff GB' with 96,381 fans.⁵⁴ Smirnoff GB is described as *"home to all of the latest news on one-of-kind experiences happening around the country. The type you look back on and say 'I was there'"*. Particular emphasis is given to publicising 'Smirnoff Experience' events, which usually take the form of Smirnoff sponsored live music events with youth appeal.

The Smirnoff GB wall on Facebook allows users to post comments for other users to view and respond to. Smirnoff make regular use of the wall, usually on at least a daily basis, to prompt users to post comments by asking questions such as, *"Who are the hot new bands you're listening to at the moment?"*⁵⁵ Users are encouraged to enter dialogue with the Smirnoff brand although, as with other alcohol brands, it is not clear who is responsible for posting prompts and questions on behalf of Smirnoff. Becoming a fan of Smirnoff GB activates status updates alongside a Smirnoff branded logo on users' own Facebook homepage, detailing Smirnoff sponsored events, related photos and comments from other users. Fans of Smirnoff GB can invite their friends to become fans of this brand page, however there is no requirement or information to suggest that invited friends should be over the age of 18; these invites can be sent to anyone within the user's social network.

Particular emphasis is given to the ‘Smirnoff experience’ and visitors to the Smirnoff Facebook page can even apply for a ‘creative grant’ of up to £5,000 to support the development of a *“one-of-a-kind night or experience”*. The opportunity to win tickets to one of these ‘extraordinary events’ is offered in addition to a facility to view photographs from previous events. Facebook users can also view photographs from Smirnoff sponsored events uploaded by Smirnoff GB or upload their own photographs and post comments about the photographs. One comment accompanying a photograph posted by a user reads, *“Yea nice one Smirnoff, can you now pay for the steel filter that I need to replace my liver?”*⁵⁶

A large number of unofficial (user generated) groups also exist in relation to Smirnoff; using the term ‘Smirnoff’ to search for groups on Facebook generates over 500 results. The groups listed include groups whose names endorse irresponsible consumption such as, ‘Addicted to Smirnoff’ with 833 members and ‘Smirnoff is my life!!!!’ with 23 members.

7.4.3 Bebo

Searching for the term ‘Smirnoff’ generates 2,802 results on Bebo, across the six standard Bebo categories on offer (i.e. people/videos/music/groups/games/applications).⁵⁷ There are no official Smirnoff pages on Bebo, although there are 118 Smirnoff related groups. The largest group has 391 members and uses the title ‘Official-Smirnoff-Homepage’. This type of page highlights the blurred boundaries between official brand pages and user generated pages.

Again, groups which suggest irresponsible or underage consumption of alcohol exist within Bebo. One group, for example, is titled ‘JVC Smirnoff Army’ with ‘JVC’ being an abbreviation for ‘Junior Vodka Club’.⁵⁸ The initiation process for membership of this group is described as follows: *“Let’s not kid anyone we are the junior vodka club so ur initiation has to be 3/4 a litre of vodka and still make the whole night.”* There are also 533 Smirnoff related videos on Bebo, including video clips of Smirnoff television adverts, although not all of these videos related to the Smirnoff brand.

7.4.4 YouTube

Smirnoff has an official channel on YouTube⁵⁹ which allows visitors to view video clips of Smirnoff adverts and events. Users can select their favourite video clips and share them with friends via links provided on Smirnoff’s YouTube channel to Facebook, Bebo, Twitter, MySpace, Orkut and Live Spaces. Users can also subscribe to the Smirnoff channel and have their profile and comments displayed on this YouTube page. One subscriber, for example, posts the comment *“I love Smirnoff commercials!!!”*.⁶⁰

Video clips of Smirnoff television adverts posted by users can also be found on YouTube. These clips include adverts for Smirnoff Ice, featuring ‘Uri’, a chilled out Eastern European character loyal to Smirnoff Ice, despite these adverts being banned by the ASA due to youth appeal (under rule 11.8.2(a) BCAP TV Advertising Code).⁶¹ More specifically, these adverts were thought to use personalities (e.g. an MTV presenter) and music likely to appeal to young people as well as juvenile humour. According to YouTube figures, this banned

television advert had been viewed over 8,000 times by users. This example highlights a loophole within the regulatory system for television adverts.

Self-filmed video clips generated by users can also be found on YouTube featuring irresponsible and underage alcohol consumption. In one clip, a boy who is clearly under 18 ‘chugs’ a bottle of Smirnoff Ice saying to camera “*Smirnoff is the best and I like it a lot*”.⁶²

7.5 Carling

7.5.1 Carling websites

The Carling website features an extensive range of promotional material and interactive features to appeal to users. The Carling homepage claims that, “*Whether it’s beer, football, music or entertainment you’re here for, we’ve got the lot*”.⁶³ Users are then encouraged to “*come in, wander about and make yourself at home*”.⁶⁴ Registration with the Carling site is encouraged by the opportunity to enter ten different entertainment and football-related competitions, with prizes which include a year’s supply of Carling.⁶⁵

The Carling website is strongly associated with football, despite the CAP Codes stipulating that marketing communications should not suggest that alcohol can enhance sporting achievements. The ‘Carling Football’ section of the website prompts users to check out the official site of the Carling Cup competition (sponsored by Carling), view and leave comments on football transfer news or register with the ‘One-All amateur football community’. By registering with ‘One-All’, users can create a free website for their team or league, win team shirts and Carling-sponsored kit, join football debates, get their own profile, join their local team or leagues page, and win tickets to Carling Cup or Old Firm (Rangers FC v Celtic FC) tickets. In order to register with ‘Carling One-All’, users are required to input their favourite football team, their pub, and how they are involved in football (e.g. as a fan or as a team player). Users also have the option of receiving e-mail, postal and text messages from Carling. Further information is required from users when they access specific features within ‘Carling One-All’. Creating a profile includes the option of adding information about favourite players, boyhood heroes and a nickname. Meanwhile, creating a team allows users to set up their own club website in a 5-step process, which includes adding team details and extras such as photos and links. The final step in the process incorporates a viral marketing element to this feature by suggesting that users “*Email the team to let your players know about the website*”.⁶⁶ Thus users are encouraged to set up what is described as their own website, but it is of course Carling branded and intended to be viewed by other potential consumers.

Music and entertainment is also a prominent feature of the Carling website:



<http://www.carling.com/music/> [accessed 18th December 2009]

When accessing the music section of the Carling website, users are given the following information:

*“Check out our [Gig Guide](#)! Now not only can you **buy tickets** for music events across the UK, but you can also check out the nearest pub to drink in before the gig with our **Beerfinder**, watch the latest videos by the band you're going to see on **YouTube**, get all the essential pub banter about the band by swatting up on their **Wiki page** or become their friend and listen to their tunes on **MySpace**.”*

The range of features presented to users here highlights the all encompassing nature of Carling's promotional activity. In addition to reviewing Carling's gig guide, and associated band pages on social networking sites, users can access local entertainment information through 'Beerfinder'. By signing up to 'Beerfinder', users can receive information about bars and pubs in their local area and *“Tell the world about your favourite pubs and why you love the so much!”*⁶⁷:

<http://www.carling.com/beerfinder/> [accessed 23rd December 2009]

Unlike other alcohol brand websites, guidelines for User Generated Content are provided on the Carling website. These guidelines are fairly broad in their scope and they include some of the principles contained within the CAP Codes such as prohibiting reference to excessive drinking or alcohol being handled by those who look under 25. However, there is no reference to other key aspects of the CAP Code (see page 4). The Carling website also contains some information about a Drinkaware survey via a link to the Drinkaware website, to help users find out more about drinking limits. However, this section is small and overshadowed by the sheer volume of other promotional material available.

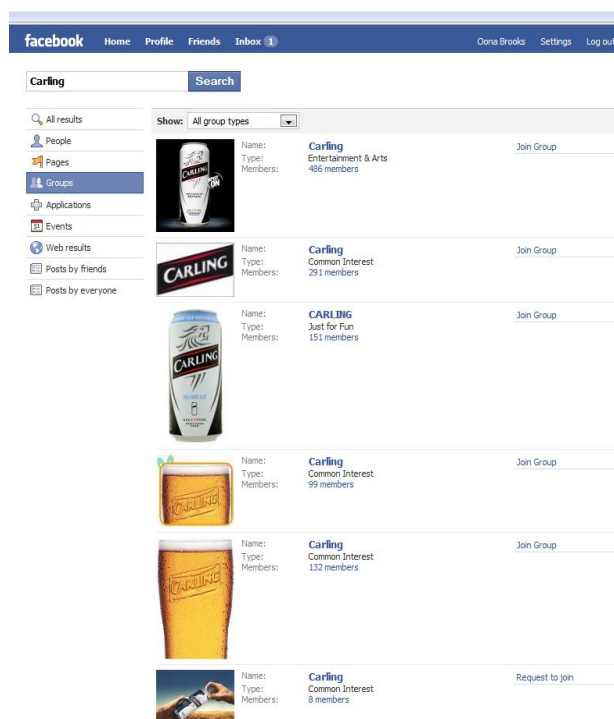
7.5.2 Facebook

Conducting a search on Facebook using the brand name 'Carling' generates results for 52 Carling related pages. The most popular page, with 10,782 fans, is simply titled 'Carling' and it uses a Carling logo. The information tab attached to this page provides a link to the Carling website, a company overview and some product information. Like many of the pages found on social networking sites, it is difficult to tell from this page whether it is an official Carling page or whether it is user generated; the layout, appearance and features of official brand pages and user generated pages is identical. The absence of any posts from Carling, which prompt users to write comments on the page, suggests that this particular page is user generated. Nonetheless, users post comments about Carling lager and respond to those left by other fans of the page in a way that mimics those on official brand pages. Comments posted on this page promote underage and irresponsible drinking. One user, for example, states *"Im only 12 but CARLING is Great"*.

Although Carling does not appear to have an official page on Facebook, visitors to the Carling website are encouraged to use this, and other social networking sites to pass on the 'Carling gospel':

“Seen a hilarious story? Noticed a top competition? Then use these links to spread the Carling gospel amongst your pals! Nearly every man and his dog has a social networking site these days, such as Facebook, and some of us even have friends! So, simply click on the icon for the site that you’re registered on and share our colourful content with your mates....We’re a friendly bunch here at Carling and so we’ve made it nice and simple for you to jump on the social networking phenomenon that is Facebook, Digg It and Del.icio.us. Follow the relevant links below and you can be sharing the very best of Carling with your mates in seconds...”⁶⁸

There are 3,000 Carling related groups on Facebook, which have been set up by users. Most, but not all, of the groups are related to the Carling lager brand. The pages for these groups typically contain photos and comments about Carling posted by users and include a Carling branded logo as the icon for the group:



<http://www.facebook.com/search/?q=Carling&init=quick#/search/?flt=1&q=Carling&o=69&sid=1746840362.3060520204..1> [accessed 8th January 2010]

This is a clear example of the way in which users adopt alcohol branded images and logos and then share them within their own social networks.

7.5.3 Bebo

Searching for the term ‘Carling’ on Bebo generates 12,214 results,⁶⁹ although it should be noted that many of the results do not relate to the Carling brand (e.g. they relate to individuals with the surname ‘Carling’). There are 687 Carling related groups on Bebo. The group with the most members (280) is a user generated group, although it looks like an official Carling page due to its use of Carling branded logos and ‘skin’ (i.e. the background visual appearance and layout of a website’s page):

Carling

Belong 112 weeks ago | me too! | Reply

Photos | Members | Videos | Comments

Become a Member

Profile views: 1,803
Group created: October 2007
www.bebo.com/carling/black-label

Use this skin
Share this profile
Report Abuse to Bebo / CEO
Surf similar Groups

About Me

THE TASTE OF BRITAIN

Tagline
The Taste of Britain

Me, Myself, and I
Carling, formerly known as Carling Black Label, is the best selling beer in the United Kingdom; alcohol content of 4.1%. In 1840 a bloke named Thomas Carling started brewing in London to soldiers at the local military camp. He later became knighted in 1893.

Carling are currently the main sponsor both Celtic F.C and Rangers F.C. Scotland is the only region in the UK where Carling is not the top selling Lager currently outsold by Tennent's Lager. They are also the main title sponsor of the Football League Cup, and were former sponsors of the Premier League.

Carling is also a major sponsor of live music in the UK, sponsoring the Academy Music Group venues (including Brixton Academy), as well as the Reading and Leeds Festivals.

<http://www.bebo.com/Profile.jsp?MemberId=4924138285&TUUID=d28128a3-1238-4391-8ab9-ac813c0bb9e7>
[accessed 23rd December 2009]

This Bebo page for the most popular Carling group includes features which allow users to draw their own Carling logo on a whiteboard, view a Carling Black Label television advert and photographs relating to the ‘Carling Cup’, ‘Carling Weekend’ and ‘Carling Academies’ (i.e. music venues). This page is a prime example of the blurred, and at times confusing, distinction between pages set up by alcohol brands and those set up by users. However, this page also includes ‘The essential guide to drink problems’, which contains advice such as:

SYMPTOM: *Pint appears to be crystal clear...*

FAULT: *It's water. Somebody is trying to sober you up.*

ACTION: *Punch him/her.*

A number of similar user generated groups exist on Bebo, including the second most popular group entitled ‘Carling – Official’. This group’s page includes a forum post titled “*What Could Carling Do To Make There Drink Stronger, Better Taste?*” with the response, “*Right Down Your Ideas, Or Visit The Carling Website And Tell The Bastards Lol*”.⁷⁰ Within this group users encourage one another, not only to visit the official Carling website, but to consider how the strength of the drink could be increased.

7.5.4 YouTube

There are numerous television adverts and Carling related football video clips on YouTube. The ‘Carling Birds Belong’ television advert, for example, has been viewed 28,791 times by YouTube viewers, while the ‘Carling Belong Explorer’ advert has been viewed 70,634 times, proving to be most popular with girls between the age of 13-17 years. YouTube provides a facility where both contemporary and old television adverts can be viewed and commented upon. For example the ‘Carling Black Label - Launderette - 1986 - UK Advert’ can still be

viewed on YouTube,⁷¹ providing television adverts with a longevity which would have been difficult to achieve without the use of such sites.

7.6 Summary of Main Findings

- All four alcohol brand websites contain material which clearly contravenes the spirit of the CAP Codes on advertising.
- The official pages of three of the four alcohol brands on social networking sites also contain material which contravenes the spirit of CAP Codes on advertising.
- Effectiveness of age verification processes is questionable since there is nothing to prevent underage users from entering a fictitious date of birth.
- Alcohol television adverts which have been banned by the ASA from television broadcast can be found on video sharing sites such as YouTube.
- Television adverts for alcohol brands streamed on YouTube are frequently cited as being most popular with 13- 17 year olds.
- Viral marketing campaigns are used by alcohol producers to encourage consumers to adopt brand values and distribute these messages within their social networks.
- Consumers develop their own alcohol brand related pages and groups on social networking sites, often using branded images provided by alcohol producers to celebrate irresponsible, excessive and underage consumption.

Of particular concern, is the extent to which much of the material contained within both the alcohol brand websites and social networking sites contravenes the spirit of the CAP Codes on alcohol advertising by:-

- appealing to youth, social success, masculinity and femininity (WKD, Lambrini)
- suggesting that alcohol might be indispensable (Smirnoff) and that the success of a social occasion depends upon alcohol (Smirnoff, Lambrini)
- suggesting that alcohol can enhance mood (Lambrini)
- linking alcoholic drinks to sexual success (WKD)
- associating alcohol with sporting achievements (Carling).

8.0 CONCLUSIONS

The use of new media channels to market alcohol is a clear area of concern due to their youth appeal, relative lack regulation and the sheer volume of promotional messages. Alcohol producers use an extensive range of channels to promote their brands, providing an ever increasing number of ways for consumers to interact with their brands. These channels include interactive games, e-mail newsletters and promotions, online competitions and downloadable features such as branded MSN icons, wallpapers, cocktail recipes, barfinders and nightlife guides. Essentially, alcohol producers can use diverse and increasingly sophisticated new media channels as a powerful means to interact and engage with consumers.

However, a key point to note is that new media marketing is not simply replacing traditional alcohol marketing channels; rather it is an extension of alcohol marketing activities. Alcohol brand websites, for example, allow alcohol producers to extend the reach of expensive television advertising campaigns by providing a facility for these adverts to be viewed online. These television adverts can then also be found on video sharing sites such as YouTube, even if they have been banned by the ASA from television broadcast. While alcohol producers may not upload these video clips to YouTube, there is no need for them to do so since users do this for them. It is a matter of concern that television adverts streamed on YouTube for alcohol brands are frequently cited as being most popular with those who are underage (ie. 13-17 years).

Viral marketing campaigns are used by alcohol producers to facilitate the adoption of brand values by consumers who will in turn distribute these messages within their social networks. Consumers are encouraged to upload their own photographs, stories and comments to alcohol brand websites and social networking sites. There is considerable evidence of consumers developing their own alcohol brand related pages and groups on social networking sites, using branded images, and doing so in a way which celebrates irresponsible, excessive and underage consumption.

Further, much of the material contained within alcohol brand websites and social networking sites contravenes the spirit of the CAP Codes on alcohol advertising by appealing to youth, social success, masculinity and femininity. Indeed, viral marketing campaigns are inherently linked to social success and social acceptance since they thrive upon the existence and development of social networks. The 2008 Alcoholic Drinks Advertisements Compliance Survey by the ASA reported that alcohol advertising was 100% compliant with the regulationsⁱ. However, this may say more about the regulations than alcohol advertising using new media channels; brand websites and pages on social networking sites are not currently covered by CAP Codes.

The extensive use of new media to market alcohol represents a proliferation of alcohol branded messages directed towards consumers. The cumulative impact of such an extensive range of marketing communications has the potential to contribute to the normalisation of alcohol consumption, while responsible drinking messages are lost in amongst the volume of

i A total of 456 adverts were considered by the compliance team, with 81 of these adverts being online adverts.

exposure to other messages. Thus, both the volume *and* content of alcohol advertising must be addressed. The current system of regulation continues to rely upon self-regulatory codes, which focus primarily on content rather than volume and exposure to alcohol advertising.

8.1 Recommendations

SHAAP is calling on the four governments of the UK to:-

- Subject alcohol brand websites to CAP Codes and all online alcohol adverts to a pre-vetting process in keeping with broadcast adverts with immediate effect.
- Move towards ending self-regulation - regulation should be independent of the alcohol and advertising industries.
- Move towards a complete ban on alcohol promotion on social networking sites.
- Involve young people in the process of regulation given the rapidly evolving nature of new media.

GLOSSARY

Advertising - A marketing communication that is paid for by a company with the object of promoting ideas, goods, or services through a media channel (e.g. TV and radio adverts, billboards, branding, sponsorship, etc.). It is intended to persuade and sometimes to inform. The two basic aspects of advertising are the message and the medium.

Applications - Pieces of software that interact with users through quizzes and games etc. Usually created by third party developers

ASA – Advertising Standards Agency. The UK self-regulatory body for maintaining standards in advertising.

Banner ad - A long, horizontal, online advert usually found running across the top of a page in a fixed placement.

Bebo - One of the three most popular social networking sites in the UK, founded in 2005.

Blog - Short for weblog. A weblog is an online journal (or newsletter) that is frequently updated, presenting the opinions or activities of one or a group of individuals. Displaying in chronological order, it is intended for general public viewing.

CAP – Committee of Advertising Practice.

Del.icio.us - A social bookmarking web service for storing, sharing, and discovering web bookmarks. The site was founded in 2003.

Digg – A social news website made for people to discover and share content from anywhere on the Internet by submitting links and stories, and voting and commenting on submitted links and stories. Voting stories up and down is the site's cornerstone function, respectively called *digging* and *burying*.

Drinkaware – An alcohol industry funded organisation which aims to promote responsible drinking in the UK.

Facebook - The most popular social networking site in the UK, founded in 2004.

Flickr - A social networking site based around photo sharing.

IAB – Internet Advertising Bureau.

Icon - A small image on a computer screen that represents something such as a program, device, recognisable symbol or logo.

Live Spaces - Microsoft's blogging and social networking platform, released in early 2004.

Marketing - The process of planning and executing the conception of a product idea or service, its pricing, its promotion and its distribution to create 'exchanges' that will satisfy both the needs of consumer and the organisation.

Marketing Communication - The promotional message conveyed to the consumer (e.g. by advertising, personal selling, public relations, publicity or sales promotions). It is designed to gain attention and to be understood, believed and remembered.

Microblog – A blog with short, size restricted posts.

MySpace - A popular social networking site in the UK, founded in 2003.

New media - Digital, computerized, or networked information and communication technologies (e.g. the internet, electronic games, blogs, podcasts).

Orkut – A social networking website owned and operated by Google Inc. It allows members to maintain and create relationships with pictures and messages.

Podcasting - Involves making an audio file of content (usually in MP3 format), typically in the form of a radio program, which is available to download to an MP3 player.

Pop-up ad - An online advert that ‘pops up’ in a window over the top of a web page.

Portman Group - An industry led group which was established in 1989 by the UK’s leading alcohol producers, and is concerned with the social responsibility issues surrounding alcohol.

Profile - The personal homepage on a social networking site, usually including information about a user, photos, and their friend list. Profiles form the basis of social networking sites.

Skin - The background or texture of a users profile. It can include patterns and animations..

Social networking site (SNS) - A site which allows users to create a personal page or profile and construct and display a social network of their online contacts.

Text messages - Brief written messages between mobile phones.

Twitter - The most popular and heavily used microblogging system.

User generated content (UGC) - Online content created by website users rather than media owners or publishers - either through reviews, blogging, podcasting or posting comments, pictures or video clips. Sites that encourage user generated content include MySpace, Bebo, YouTube, Flickr and Facebook.

Viral marketing – A marketing technique based on the idea that people will pass on and share striking and entertaining content; this is often sponsored by a brand, which is looking to build awareness of a product or service. The content passed on by viral marketing campaigns can take the form of video clips, interactive games, images, and text.

Wiki – Short for Wikipedia; a multilingual, web-based, free-content encyclopedia project, written collaboratively by an international group of volunteers.

YouTube - A popular social networking site for video sharing, founded in 2005.

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