

risk assessment



emissions



any number of inputs to consider



but this is what matters

emissions

risk assessment



rigorous  
statutory  
global

emissions

# the marketing matrix: controlling toxic emissions

Gerard Hastings

APN Symposium,  
6th October 2015  
Edinburgh

# structure

1. Risk assessment
2. How marketing works
3. The regulatory challenge
4. Learning from tobacco
5. Conclusion

# Risk Assessment

Aim: to minimise known risks

Where in the production, distribution and consumption of a product or service does risk occur?

Then statutory rules to reduce risks

The Factories Act; health and safety; machine guards....

Not always done, but the principle is sacrosanct

In alcohol we already do this for production (health and safety) product specification (distilling regulations) distribution (licensing) and but not for marketing

# Risk Assessment

- Unhealthy promotion harms to children:
  - Energy dense food, tobacco and alcohol



The three cornerstones of public health



# Risk Assessment

- Even industry accepts :
  - marketing effects, albeit only at a brand level
  - and health effects, albeit down-played
- All agree the need to protect children
  - Especially for adult-only products like alcohol
- The debate is about how to regulate

# structure

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# How alcohol marketing works

The nature of advertising, marketing & business

- Subtle: artful association rather than overt sales pitch

*‘Substantial evidence now shows that judgements and behaviours, including those relating to consumption, can be strongly influenced by implicitly acquired affective associations, rather than via consciously mediated persuasive information. Contemporary advertising formats typically targeted at children are particularly likely to ‘implicitly persuade’ in this way’*

(Nairn A and Fine C 2008)

# How alcohol marketing works

## The nature of advertising, marketing & business

- Subtle: artful association rather than overt sales pitch
- Increasingly not even recognisable as advertising

### The rules

One of the most common concerns we hear about online ads is that the content of an ad was misleading, and sometimes that includes uncertainty as to whether the content you've seen online is advertising or not. The rules in this area state:

- Ads must be obviously identifiable as such
- Ads must not materially mislead or be likely to do so

<http://www.asa.org.uk/~media/Files/ASA/Hot%20Topics/Spotting%20Online%20Ads.ashx>

Advertisers are allowed to make their ads appealing, including by making the content more similar to interesting editorial content, but advertisers must be cautious that, in seeking to make ads more inviting, they do not camouflage their advertisements.

# How alcohol marketing works

The nature of advertising, marketing & business

- Subtle: artful association rather than overt sales pitch
- Increasingly not even recognisable as advertising
- Engagement brings power –  
nb digital (Kenny 2014)
- Multifaceted; a 'marcomms' mix of channels designed to
  - achieve specific aims
  - complement wider mix
  - no one channel matters

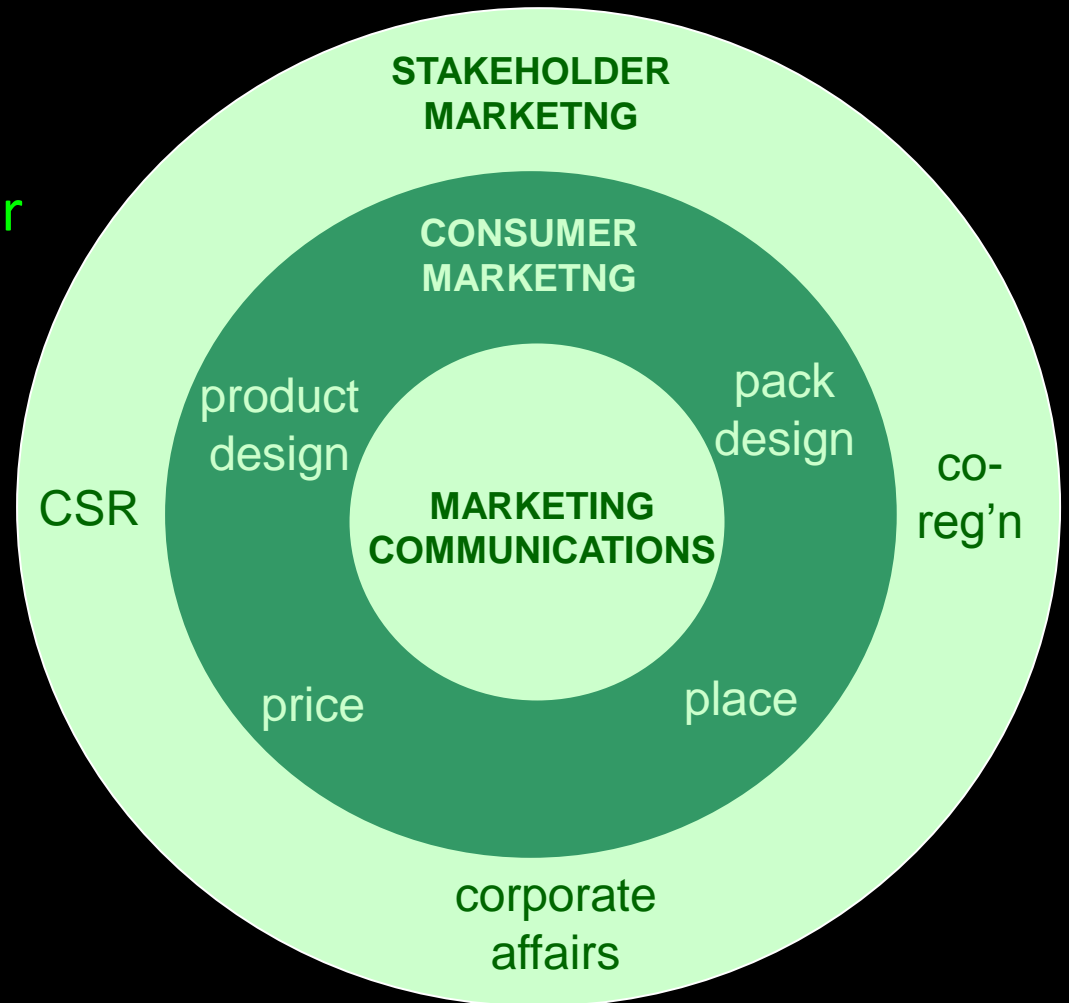
# How alcohol marketing works

The nature of advertising, marketing & business

SMART aims focused on profitability – usually further simplified into sales\*

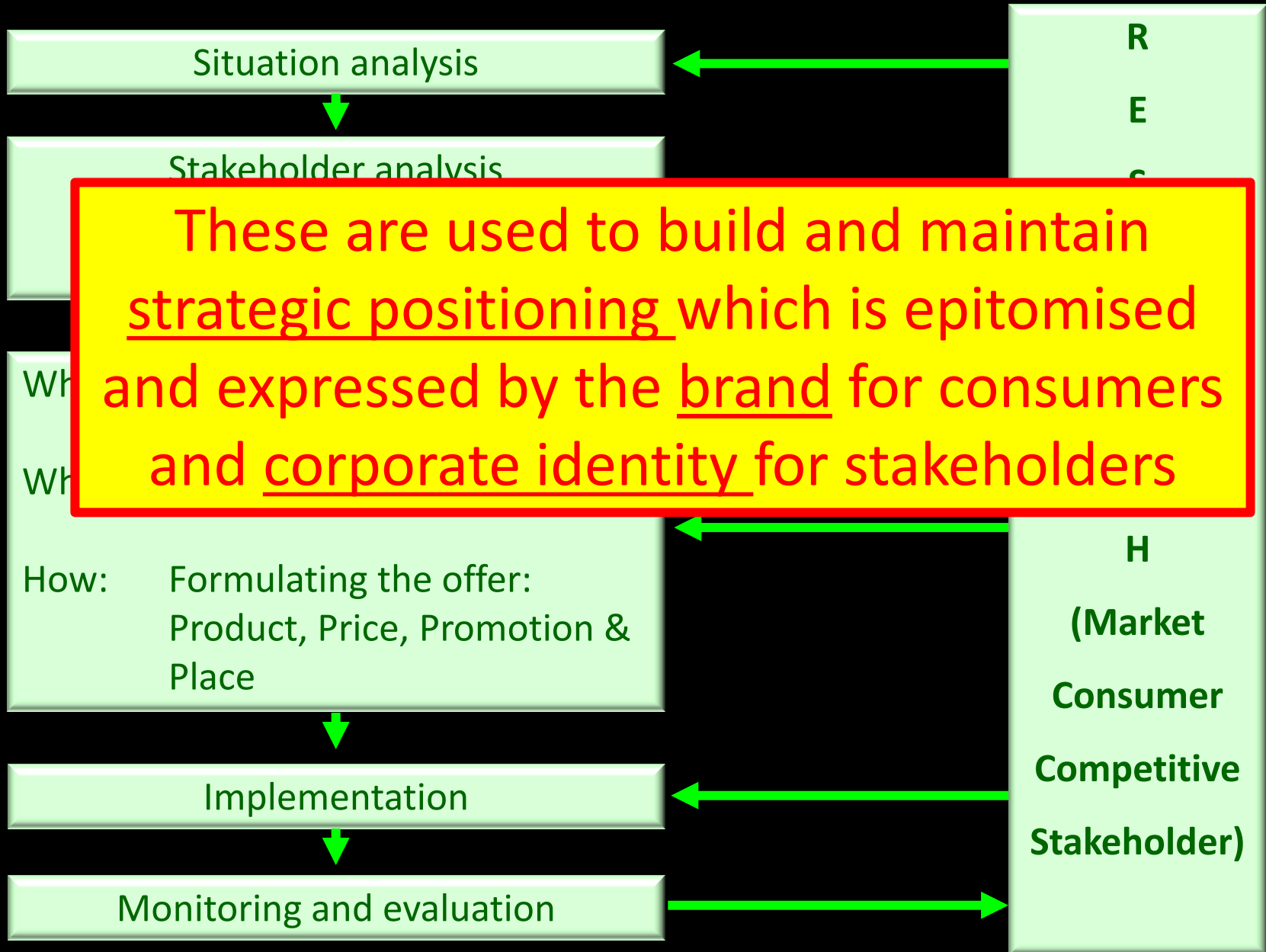
Multifaceted and complementary tool box – the whole is greater than the sum of the parts

Strategic planning to define and guide progress



\* Specific, Measurable, Achievable, Realistic and Timely

# Strategic Planning



# How alcohol marketing works

The nature of advertising, marketing & business

## The fiduciary imperative

Corporations spend shareholders (stockholders in the US) money so they have to prioritise their financial interests. Social responsibility will always be servant to these interests.

→ Single-minded focus on fiscal returns



# How alcohol marketing works

The nature of advertising, marketing & business

- Clear, measurable objectives
- Coherent strategic and adaptable approach
- Single-minded focus on fiscal returns

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- Cognitive defences useless;  
have to reduce exposure  
'Thou shalt not' content  
controls are unworkable

CHOOSE YOUR COUNTRY



SEARCH



10TH - 12TH

JULY 2015

STRATHALLAN CASTLE, PERTHSHIRE, SCOTLAND

HOME

TICKETS

LINE UP

ESSENTIALS

ATTRACTIONS

CAMPING

TRAVEL

THE VAULT

MEDIA

NEWS

2013 Line up

2012 Line up

2011 Line up

2010 Line up

2014 Line up

Home / Line up

## LINE UP

FRIDAY 11th JULY

MAIN STAGE

BIFFY CLYRO  
ED SHEERAN  
ELLIE GOULDING  
IMAGINE DRAGONS  
HAIM  
YOU ME AT SIX  
CHARLI XCX

RADIO 1 STAGE

STEVE ANGELLO  
ALESSO  
DJ FRESH  
MAXIMO PARK  
FOXES  
MEAN WORLD

SATURDAY 12th JULY

MAIN STAGE

CALVIN HARRIS  
PAOLO NUTINI  
PHARRELL WILLIAMS  
RUDIMENTAL  
JAMES  
TWIN ATLANTIC  
KATY B • THE STRANGLERS  
\* more to be announced

RADIO 1 STAGE

ELBOW  
BOMBAY BICYCLE CLUB  
THE 1975  
THE CHARLATANS  
JOHN NEWMAN

SANDIT  
MIE ELLIS-BEXTOR  
THE PILOTS

T'S TENT

WARD  
ACE  
N LEAGUE  
SOUL  
IESBITT  
TRINISTIS

SUNDAY 13th JULY

MAIN STAGE

ARCTIC MONKEYS  
JAKE BUGG  
PAUL WELLER  
BASTILLE  
KAISER CHIEFS  
KODALINE  
NEWTON FALUKNER  
RED HOT CHILLI PIPERS

RADIO 1 STAGE

DISCLOSURE LIVE  
TINIE TEMPAH  
ABOVE & BEYOND  
LONDON GRAMMAR  
SAM SMITH  
CHANCE THE RAPPER  
REVEREND & THE MAKERS  
INSPIRAL CARPETS

KING TUT'S TENT

EXAMPLE  
FRANZ FERDINAND  
TAME IMPALA  
PASSENGER  
METRONOMY  
WILKINSON

BY CONCERTS & FOUNDING PARTNER

TERRENT'S LASER PRESENT



THURSDAY NIGHT ENTERTAINMENT...

MIDNIGHT BEAST'S  
WELCOME TO THE DIRTY WEEKEND  
SUB CLUB'S HARRI & DOMENIC  
DRUMS OF DEATH  
MIA DORA  
DIXON AVENUE BASEMENT JAMS  
BEN MARTIN & WARDY (LA CHEETAH CLUB)

ENTERTAINMENT ACROSS THE WEEKEND...



## BCAP Rule 11.8.2(a)

(1) Advertisements for alcoholic drinks must not be likely to appeal strongly to people under 18, in particular by reflecting or being associated with youth culture.

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- Cognitive defences useless; have to reduce exposure  
'Thou shalt not' content controls are meaningless
- The problem is getting worse
- Comprehensive controls are essential  
Exposure reduction is key  
Marketing continues whatever the regulation

# How alcohol marketing works


The nature of advertising, marketing & business

- Clear, measurable objectives
  - Coherent strategic and adaptable approach
  - Single-minded focus on fiscal returns
- Regulation also needs to be statutory, strategic and adaptable
- Independence from industry is essential

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# We have been here before with tobacco

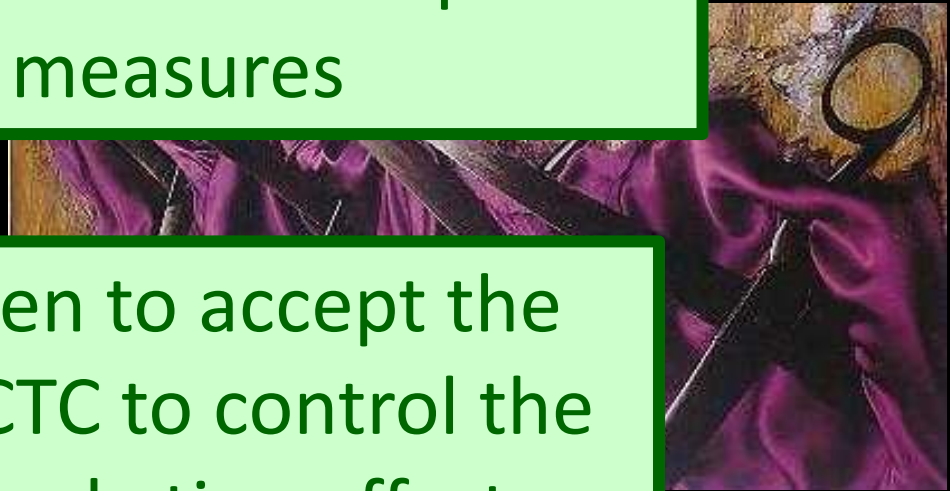


It took us thirty years to learn that progress comes only from radically reducing exposure to marcomms with comprehensive and adaptable control measures

Content  
which just  
activity

The failure of partial measures:

tv ads were  
adspend o  
year increa



And another ten to accept the need for the FCTC to control the rest of the marketing effort

Industry involvement that just led to delays and prevarication



## A vision for the future

*Professor V.S. Mihajlov (former Union of Soviet Socialist Republics)*

“Although this might be unrealistic at the present time, and indeed even ridiculous. I for my part am convinced that the day will come when international health law will contain rules at eliminating drunkenness, alcoholism and tobacco use, all of which cause enormous damage to health.

Certain actions could indeed be carried out forthwith, examples being the development of conventions prohibiting advertising of tobacco products or strengthening international cooperation in efforts to combat the smuggling of alcohol beverages.”

1989

# conclusion

## Key requirements

Radical exposure reduction

Comprehensive controls

Independent, statutory core

Continuity, adaptability & strategic vision

In short: we need an FCTC for alcohol