

**HOUSE OF COMMONS HEALTH COMMITTEE
INQUIRY INTO THE GOVERNMENT'S ALCOHOL STRATEGY
PORTMAN GROUP SUBMISSION**

1. The Portman Group is the responsibility body for UK drinks producers. We regulate the promotion and packaging of alcoholic drinks sold or marketed in the UK; challenge and encourage the industry to market its products responsibly; and lead on best practice in corporate alcohol social responsibility.

EXECUTIVE SUMMARY

2. The vast majority of adults in the UK enjoy sociable drinking, with 78% drinking within Government guidelines¹. Patterns of consumption are improving.
3. The Alcohol Strategy (the Strategy) recognises the value of effective self-regulation of alcohol marketing and the Portman Group's (PG) leadership role alongside Ofcom and the Advertising Standards Authority.
4. Drinks producers are effective, committed partners in tackling alcohol misuse and creating a responsible drinking culture. Profit and social responsibility are not mutually exclusive. The industry's sustainable future is linked to playing its part in reducing harms, alongside other stakeholders, such as parents and employers.
5. The Public Health Responsibility Deal (RD) works - partnership working has delivered unprecedented voluntary commitments since launch.

¹ Government Alcohol Strategy 2012

6. Industry-led innovation has resulted in fast, collective solutions to reducing harms: local partnerships combatting anti-social behaviour and underage purchasing; raising awareness of sensible drinking guidelines; and a wider range and availability of lower-alcohol drinks (resulting in a market reduction of 1 billion units).
7. Government policy should build on the RD partnership and be evidence-based. It must target the minority misusing alcohol and not penalise the majority drinking responsibly. Policy should not overburden responsible business partners.
8. We invite the Committee to consider two areas:
 - The need for consistent Government-led alcohol statistics updated regularly, including both consumption patterns and harms.
 - Widespread introduction of effective employee alcohol policies, such as those used by drinks companies.

ALCOHOL TRENDS IN CONTEXT

9. **Alcohol is commonplace in society** - in 2010, 84% of the working-age population in England drank alcohol².
10. **UK per capita consumption has fallen** from 9.5 to 8.3 litres per head³ between 2004 and 2011. Consumption in the UK is equal to the European average and lower than many of our European neighbours, including Spain, Ireland and France⁴.

² Office for National Statistics, General Lifestyle Survey Overview 2010, Published 8 March 2012

³ HM Customs and Excise & British Beer & Pub Association, New figures show UK alcohol consumption down again in 2011, 11 March 2012.

⁴ OECD Health Data ,2010; WHO, 2010

11. **Majority drink within weekly guidelines** - in 2010, 74% of men drank less than 21 units p/w (2005: 69%) and 83% of women drank less than 14 units p/w (2005: 79%)⁵.
12. **Drinking at harmful levels falling** - in 2010, 6% of men drank more than 50 units p/w (2005: 9%) with the equivalent for women down to 3% from 5%)⁶.
13. **Binge drinking down** - in 2010, 19% of men drank more than 8 units on their heaviest drinking day (2005: 23%) and 13% of women drank over 6 units (down from 15% in 2005)⁷.
14. **Young people binge-drinking at lowest recorded levels** - in 2010, only 17% of 16-24 year old women drank more than 6 units on their highest drinking day (2005: 27%) and 24% of young men drank more than 8 units (2005: 32%)⁸.
15. **Fewer 11-15 year olds trying alcohol** - in 2010, 55% had never had an alcoholic drink (2001: 39%) with the percentage reporting past week drinking falling by over half from 26% to 13%⁹.

ALCOHOL-RELATED HARMS

16. **The number of hospital admissions for which alcohol is the primary diagnosis** stood at just under 195,000 in England in 2009/10, up from 142,000 in 2002/3.¹⁰
17. There were 8,790 **alcohol-related deaths in the UK** in 2010, whilst doubling since the early 1990s, have remained broadly flat over the last five years¹¹.

⁵ Ibid., Table 2.2

⁶ Ibid., Table 2.2

⁷ Ibid., Table 2.4

⁸ Ibid.00, Table 2.4.

⁹ NHS Information Centre, *Smoking, Drinking and drug use among young people in England 2010*, 28 July 2011, table 3.3b.

¹⁰ NHS Information Centre, *Statistics on alcohol: England 2011*, table 4.1

18. There were just under a million **alcohol-related incidents of violent crime** in 2010, accounting for 50% of all violent crime, with volumes having fallen from 1.6 million in 1995¹².

19. **Drink-driving fatalities have fallen by 85% since 1979 to 250** fatalities and 1,230 seriously-injured casualties in 2010¹³.

DETAILED RESPONSES

A Responsibility within Government

20. Given the cross-cutting nature of alcohol policy, effective coordination across Government is vital. Policies should be evidence-based and consider the impact upon all sectors of society.

B Co-ordination of alcohol policy across the UK

21. The UK is a single market, and consistent regulation (e.g. product labelling, marketing, and licensing law) provides clarity for consumers and businesses and prevents discriminatory regulatory burdens harming growth, investment or jobs.

22. However, alcohol misuse is particularly concentrated in a number of local areas, such as Blackpool, Salford, Liverpool, Manchester and North Tyneside, which consistently score in the top 20% of local authorities in England (and significantly above the national average) across a basket of measures of alcohol related harm, such as health, mortality, crime and binge drinking.

23. To counter this and avoid penalising the responsible drinking majority, we advocate a locally targeted partnership approach which involves bringing the weight of national organisations (alcohol producers,

¹¹ Office for National Statistics, *Alcohol-related deaths in the United Kingdom 2010*, January 2012.

¹² Home Office Statistical Bulletin, *Crime in England and Wales 2009-2010*, July 2010

¹³ Department for Transport, *Reported Road Casualties in Great Britain, 2010 Annual Report*

retailers, police, NHS, employers etc.) behind effective local schemes (such as Best Bar None, Purple flag, Pubwatch, and Community Alcohol Partnerships) in a co-ordinated way.

C Industry involvement - alcohol-related health problems

24. The Alcohol Strategy recognises the need for effective self-regulation and the Portman Group's role in achieving this.

25. The Responsibility Deal is the right approach. It enables industry to deliver practical measures quickly to effect positive behaviour change. It encourages local partnerships to reduce anti-social activity and uses innovative consumer marketing and education programmes (eg the industry-funded Drinkaware) to communicate the Government's sensible drinking guidelines and promote responsible behaviour.

26. In the UK, alcohol marketing is subject to strict controls ensuring that alcohol promotion is socially responsible and targeted only at 18 and overs.

27. Three regulatory bodies control standards of alcohol marketing; the Portman Group, the Advertising Standards Authority (ASA) and Ofcom, ensuring there are no regulatory gaps (see Appendix A).

28. The Portman Group Code (the Code) – introduced in 1996 - covers the responsible naming, packaging and promotion of alcohol. It prohibits associations with social/sexual success or harmful or irresponsible consumption.

29. An alleged breach of the Code is referred to an Independent Complaints Panel. Where complaints are upheld, licensed retailers are instructed not to stock the product. The Code is commended to licensed retailers under the Licensing Act (see para 38). A press release reporting the breach can inflict reputational damage on

producers. Since 1996, over 80 products have been removed from the market.

30. Our aim is to prevent irresponsible products or promotions coming to market. Our free pre-launch Code Advisory Service received over 500 requests for advice in 2011. We also offer a comprehensive industry Code training programme.

31. We conduct third party audits; watch for problematic products/promotions; and monitor the Trade Marks Registry for new alcoholic products. Many producers have their own internal marketing codes which go over-and-above the minimum required by our Code.

32. The Code must reflect changing environments and marketing practices, so regular reviews have taken place. These ensure there is balance between protecting children and legitimately marketing products to adults.

33. Our RD pledge to review the Code is already underway. We are in the consultation phase and will develop a new edition of the Code during the summer and expect to launch it in autumn 2012.

D Minimum Unit Pricing (MUP)

34. The Portman Group does not wish to comment on MUP. Our focus is on reducing harm by enforcing effective self-regulation through our Code of practice and the collective leadership actions of our member companies.

E Effects of marketing on alcohol consumption.

35. The UK has some of the most effective self-regulatory codes to ensure alcohol is marketed responsibly and not to children.

36. The Secretary of State's Guidance on the Licensing Act commends the Portman Group Code:

“The Code is an important weapon in protecting children from harm because it addresses the naming, marketing and promotion of alcohol products sold in licensed premises in a manner which may appeal to or attract minors. The Secretary of State commends the Code to licensing authorities and recommends that they should commend it in their statements of licensing policy.”

37. Critics believe alcohol marketing encourages people, particularly under-18s, to start drinking earlier or to drink more¹⁴. However, official statistics show fewer young people (16-24) and children (11-15) are drinking (see paras 14, 15 above).

38. The influence of marketing on alcohol consumption is subject to various studies. Whilst there is longitudinal research showing a modest relationship between marketing exposure and drinking among young people; the strength of association varies between studies¹⁵.

39. The lack of evidence is recognised in the Strategy:

“So far we have not seen evidence demonstrating that a ban is a proportionate response but we are determined to minimise the harmful effects of alcohol advertising.”

40. Furthermore, the marketing impact on young peoples' drinking behaviours is likely to be outweighed by other factors (such as family environment, peer behaviour, socioeconomic status, and personal attitudes^{16 17 18}).

¹⁴ www.ias.org.uk/resources/factsheets/advertising.pdf

¹⁵ Anderson, P., de Bruijn, A., Angus, K., Gordon, R., & Hastings, G. (2009). Impact of alcohol advertising and media exposure on adolescent alcohol use: A systematic review of longitudinal studies. *Alcohol and Alcoholism*, 44, 229–243..

¹⁶ Epstein, J. A., Griffin, K. W., & Botvin, G. J. (2008). A social influence model of alcohol use for inner-city adolescents: Family drinking, perceived drinking norms, and perceived social benefits of drinking. *Journal of Studies on Alcohol and Drugs*, 69, 397–405.

41. The Strategy has asked us to look at other ways to tighten self-regulation around retail, sponsorship and marketing. These are being addressed in our Code review¹⁹.
42. The Strategy has also given a clear mandate to ASA and Portman Group to review any advertising rules which currently inhibit the promotion of lower strength alcohol products; this is being addressed by our Code review.
43. Whilst regulating social media is new territory for many, digital alcohol marketing has been subject to our Code rules since 2003²⁰. The Portman Group led on introducing comprehensive digital guidelines for the industry in 2009. These are recognised as best practice and we share our experience with our European counterparts.

F Impact of current level of alcohol consumption

44. We have some concern about the consistent use of alcohol trend data and invite the Committee to consider a call for Government-led statistics which are updated regularly.
45. For example, the Strategy reported that the number of hospital admissions in which alcohol related health conditions were present, but not necessarily the primary diagnosis, stood at 1.2m in 2010/11 having more than doubled since 2002/3.
46. However DH announced a consultation in 2012 having previously expressed the view that the calculation used was inadequate as a

¹⁷ Scholte, R. H. J., Poelen, E. A., Willemsen, G., Boomsma, D. I., & Engels, R. C. (2008). Relative risks of adolescent and young adult alcohol use: The role of drinking fathers, mothers, siblings, and friends. *Addictive Behaviors*, 33, 1–14.

¹⁸ Fisher, L. B., Miles, I. W., Austin, S. B., Camargo, C. A., & Colditz, G. A. (2007). Predictors of initiation of alcohol use among U.S. adolescents: Findings from a prospective cohort study. *Archives of Pediatrics & Adolescent Medicine*, 161, 959–966.

¹⁹ <http://www.portmangroup.org.uk/?pid=1003&level=1>

²⁰ The ASA extended its remit to regulate the majority of online marketing in March 2011. Any alcohol marketing not within ASA remit is covered under our Code.

public health indicator²¹, preferring a focus instead on primary diagnosis alone (for which admission levels are significantly lower at just under 200,000).

47. External commentators are also commenting on the shortcomings of alcohol trend data *Straight Statistics*²².

G Impact on future patterns of NHS services

48. Not within PG remit.

H Proposed reforms of the NHS

49. Not within PG remit.

I International evidence of the most effective interventions

50. The UK is at European average for alcohol consumption per adult. However, it is drinking patterns not population-wide consumption that determine harms and these derive from differing cultural, societal and familial norms. Effective interventions may not transfer from one country to another and need to be evidence based in the country where they are applied (See also section M).

J Education and information

51. We recognise that education, changing social norms and law enforcement are essential to change behaviour.

52. It is important to provide information and education programmes to help people make sensible choices about their drinking. In recent years, numerous awareness campaigns have been run by Government and the Drinkaware Trust. Evidence suggests that more people

²¹ DH: Improving outcomes and supporting transparency Part 2: Summary technical specifications of public health indicators, January 2012
http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_132558.pdf

²² Nigel Hawkes, *Straight Statistics* – 'Alcohol admissions set to tumble'
<http://www.straightstatistics.org/article/alcohol-related-hospital-admissions-set-tumble>

understand units and the Government's recommended drinking guidelines.²³

53. More work is needed to help consumers understand how many units are in their drinks and the health impacts of drinking above the guidelines.

54. Drinks producers have committed to feature clear unit content, NHS guidelines and a warning about drinking when pregnant on over 80% of products on shelf by December 2013.²⁴

K Reducing the strength of alcoholic beverages

55. As part of the RD, the alcohol sector has launched a new pledge to introduce a wider range of lower-alcohol products.

56. This is an innovative initiative to grow a new lower-alcohol market, providing more consumer choice, helping to reduce the amount of pure alcohol they consume without affecting the number of drinks purchased. It will also remove 1 billion units of alcohol from the drinks market without penalising the responsible majority.

57. For example, a consumer who usually drinks a product at 5% ABV and substitutes it for a 4% ABV product will consume 20% less alcohol, if purchasing the same number of drinks. Evidence from other areas of behavioural science suggests they are unlikely to increase volume consumption.

L Raising the legal drinking age

58. Not within PG remit.

²³ Summary from Office for National Statistics (ONS) General Lifestyle Survey 2010, published March 2012 and Office for National Statistics (ONS), *Omnibus Survey Report: Drinking Adults' Behaviour and Knowledge in 2009, 2010.*

²⁴ www.RDA etc

59. However, it is unlikely that there would be strong support for raising the legal purchasing age and we believe it would be harmful if under-21s were to seek alcohol from illicit or harmful sources.
60. If we want to create a healthier drinking culture, where alcohol is respected it should not be turned into a social taboo.
61. At 18, people are old enough to vote, drive and fight for their country and they should be trusted to drink alcohol.
62. Preventing underage sales is more effective. Industry innovations (e.g. age verification through Challenge 21, Challenge 25, and local partnerships such as Community Alcohol Partnerships and Best Bar None) have important roles to play.
63. Alongside this, there must be rigorous enforcement of existing laws to prevent underage sales and selling to those who are intoxicated.

M Plain packaging and marketing bans

64. We note that plain packaging is not in the Strategy but is a policy being considered for tobacco products. Alcohol and tobacco are fundamentally different products.
65. Banning marketing risks commoditising alcohol to the point that it can only be marketed primarily on price or % ABV strength rather than brand position.
66. Much attention has been paid to the Loi Evin, which significantly restricts alcohol marketing and sponsorship in France. The Government's official evaluation report²⁵ in 1999 stated that the Loi Evin had been 'ineffective' in reducing high-risk drinking patterns. The

²⁵ La loi relative à la lutte contre le tabagisme et l'alcoolisme: Rapport d'évaluation, (October 2009)

French anti-alcohol NGO ANPAA accepts that the effects of the law are 'weak'.

67. The UK Government's partnership with industry enables it to lead Europe in responsibility measures such as voluntary labelling and innovating lower-alcohol drinks.

Declaration of Interest

68. We are a not-for-profit organisation funded by nine member companies²⁶ who represent every sector of drinks production and collectively account for more than half the UK alcohol market.

Confidentiality

There are no confidentiality issues and we confirm full public disclosure.

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²⁶ Current member companies are: AB InBev; Bacardi Brown-Forman Brands; Beverage Brands; Carlsberg; C&C Group; Diageo; Heineken; Molson Coors; and Pernod Ricard.

APPENDIX A

ALCOHOL MARKETING REGULATION TABLE

Regulator	Ofcom	Advertising Standards Authority	Portman Group
Remit	Television programme sponsorship (Also broadcast editorial standards)	All advertising, e.g.: <ul style="list-style-type: none"> • television • radio • press • poster • cinema • direct mail • internet • mobile phones (SMS and Bluetooth) 	All other alcohol producer marketing activities, e.g.: <ul style="list-style-type: none"> • naming • packaging • sponsorship (excluding TV programme sponsorship) • sampling • press releases • producer-generated point-of-sale materials • brand websites (except those areas covered by the ASA)
Nature of system	Statutory	Co-regulatory (broadcast) Self-regulatory (non-broadcast)	Self-regulatory (but consistent with and complementary to the entire co-regulatory system)
Rules written by	Ofcom	BCAP, but approved by Ofcom (broadcast) CAP (non-broadcast)	Portman Group
Adjudicating body	Ofcom	Independent ASA Council chaired by the Rt Hon Lord Smith of Finsbury	Independent Complaints Panel chaired by Sir Richard Tilt
Funded by	Government	Advertising industry	Drinks producers