

Review of alcohol marketing restrictions in seven European countries

Publication date: 14 June 2022

Graeme Scobie, Chris Patterson, Georgia Rendall, Lynda Brown, Ross Whitehead, Eileen Scott, Stefania Greci, Grant Donaghy, Andrew Pulford, Sonya Scott



Translations



Easy read



BSL



Audio




Large print



Braille

Translations and other formats are available on request at:

 p hs.otherformats@p hs.scot

 0131 314 5300

Public Health Scotland is Scotland's national agency for improving and protecting the health and wellbeing of Scotland's people.

© Public Health Scotland

OGL

This publication is licensed for re-use under the [Open Government Licence v3.0](#).

For more information, visit www.publichealthscotland.scot/ogl



www.publichealthscotland.scot

0765 6/2022

Contents

Key messages	2
Background	3
Aim	3
Methods	3
Results	5
Justifications for restricting alcohol marketing	5
Controlling the content of alcohol advertising	5
Alcohol advertising restrictions by medium	6
Restrictions on product packaging and sales practices	7
Variation by product strength	8
Monitoring and enforcement	9
Evaluations of restrictions	9
Limitations	10
Glossary	12
Appendix A: Search strategy	15
References	18

Key messages

- Restricting alcohol marketing is an area of policy-making action across Europe. It is consistent with the World Health Organization's (WHO) recommendations for reducing harmful use of alcohol.¹
- This review looks at alcohol marketing restrictions in Estonia, Finland, France, Ireland, Lithuania, Norway and Sweden.
- Most countries reviewed have banned alcohol advertising in specific settings or forms of media, and most restrict the content of alcohol advertising.
- Restrictions often target children's exposure to alcohol marketing and are often justified by the need to protect children. The more recent restrictions have a clearer focus on children, and countries have found that measures to protect children have strong public support.
- The overall trend is for progressively stronger and more extensive restrictions on alcohol marketing, with support from the public and civil society.
- The review did not find any comprehensive evaluations that prove the effectiveness of the marketing restrictions identified. However, we did find some academic evidence of restrictions being followed by positive results, including reductions in exposure to alcohol marketing, alcohol sales and mortality.
- The restrictions described follow international scientific consensus on how to reduce harmful use of alcohol,^{1,2,3,4,5} and the past successes of restrictions on tobacco marketing shows the value of restricting marketing of unhealthy commodities.^{6,7,8}
- The lack of comprehensive evaluations in these countries is consistent with the international evidence base on alcohol marketing restrictions,⁹ and highlights the value of including a robust evaluation framework with any future action on alcohol marketing.⁹

Background

The Scottish Government's '**Alcohol framework 2018: preventing harm**'¹⁰ centres on the **WHO's recommended approach** to preventing alcohol-related harm,¹ which includes either a total ban or comprehensive restrictions on alcohol marketing across different settings and types of media.

The **Institute of Alcohol Studies** defines marketing in a broad sense as 'the action or business of promoting and selling products or services', incorporating the 'four Ps' of product, price, place and promotion.¹¹ This review uses the EUCAM definition, but focuses on promotion (e.g. advertising), with a secondary focus on product and place. Pricing interventions such as minimum unit pricing are not considered.

Aim

This report examines the state of alcohol marketing restrictions in a diverse range of European countries (Estonia, Finland, France, Ireland, Lithuania, Norway and Sweden). It highlights the rationales used, processes for monitoring and enforcement, and evaluations of the effectiveness of restrictions. By doing so, the findings of this review may help to inform consideration of alcohol marketing policy in Scotland.

The Institute for Social Marketing and Health at the University of Stirling have undertaken a parallel piece of work to focus on the processes, successes and challenges relating to alcohol marketing restrictions in the same seven European countries. This will be informed by both desk-based research and qualitative interviews with professionals who are directly involved in developing and implementing alcohol marketing restrictions in their respective countries.

Methods

This was mainly a desk-based review of peer-reviewed, grey and online literature. Additional comments on accuracy and content were obtained from expert contacts in some of the included countries. The included countries were selected by the project

reference group to represent a diverse range of alcohol marketing restrictions and policy-making contexts.

Literature was collected through four approaches: searching peer-reviewed literature; searching grey literature; key organisational sources; and free Google searches. Databases used comprised Scopus, Medline, Proquest Public Health, ASSIA and Sociological Abstracts. Database searches were run from 2005. No time limits were set for grey literature searches.

Literature suitable for inclusion included: documentary evidence focused on a relevant country's alcohol marketing restrictions (including monitoring or evaluation); official government papers; published academic reports; peer-reviewed literature; and reports from relevant identified third sector organisations.

Criteria for excluding literature included: non-English language publication where a website translation facility was not available; publications not specific to countries of interest or wider geographical areas; publications not relevant to current alcohol restrictions; media and alcohol industry publications; and evaluations of sub-elements of enacted restrictions.

The search strategy is available in Appendix A. Findings are summarised in Table 1.

Results

Justifications for restricting alcohol marketing

- Most countries justified restrictions on grounds of promoting the health of the public by reducing population-level alcohol consumption and harmful drinking.
- Most countries had either a specific focus on protecting children or included restrictions targeting children's exposure to alcohol marketing. The Estonian government identified alcohol consumption by children as being particularly damaging, while the Swedish government identified harms to children from others' alcohol consumption, as well as their own.
- Some countries (especially Nordic countries) highlighted strong public support for alcohol marketing restrictions, particularly those targeted at children's exposure to marketing.
- Some countries (e.g. Finland and France) identified a need to find a balance between promoting health and supporting local business and the economy.

Controlling the content of alcohol advertising

- Some countries have banned alcohol advertising outright (Lithuania and Norway), while the others permit alcohol advertising but restrict the content of advertisements to factual product information (e.g. product name, manufacturer name, country of origin, ethanol content).
- Commonly prohibited content across the countries reviewed included: any content that presents drinking (particularly heavy drinking) as healthy, normal, therapeutic or desirable; content that associates alcohol with driving; content that associates alcohol with sexual success; encouragements to buy or consume alcohol; and content that links alcohol with important dates or activities.

- Legislators have also sought to protect children through rules stating that advertising must not contain content that depicts or targets children and young people.
- As well as prohibiting some content, countries have mandated other types of content within adverts, including spoken or written warnings about the health harms of alcohol.

Alcohol advertising restrictions by medium

- Some countries have outright bans on advertising in certain forms of media, while others focus their restrictions on media and settings that children and young people may be likely to see. For example, this includes outdoor advertising close to schools and other locations used by young people; in online and print media targeting younger people; in cinemas during films rated for children; and at events where most participants or attendees are children.
- Finland has an alcohol strength-based approach to marketing restrictions whereby adverts for stronger alcohol (over 22% alcohol by volume [ABV]) cannot be advertised on most channels, including on TV, radio, outdoors, in print and in cinema. Mild alcohol (between 1.2 and 22% ABV) can be advertised on most of these channels but with content restrictions.
- France has an approach whereby all advertising and promotion of alcohol is generally prohibited unless specifically allowed under French legislation (Evin law).
- Broadcast advertising for alcohol is wholly (Lithuania, Norway and Sweden) or almost entirely (France) prohibited in some countries, while others have prohibited alcohol advertising before watersheds or during family-oriented programmes.
- Lithuania prohibits alcohol advertising online entirely, while the others prohibit advertising on certain types of sites or service, such as video-sharing platforms (Sweden) or other social media platforms (e.g. Estonia and Finland).

- Finland was the first country to include specific legislative provision for alcohol marketing on social media in 2015. They prohibited commercial alcohol-related social media content which is either produced by consumers or produced by the company and intended to be shared by consumers.¹²
- All countries included in the review have full or partial bans on outdoor advertising (e.g. billboards) for alcohol. Partial bans consider the location of the advertisement and the expectation of children seeing it; for example, Ireland prohibits outdoor advertising near schools, public parks and in public transports vehicles, stops or stations.
- Lithuania prohibits any alcohol advertising in print media, while the others have partial bans, permitting some exceptions. In some cases, these exceptions are minor (e.g. Norway permitting alcohol advertising in foreign magazines) while in others they are more lenient (e.g. France prohibiting alcohol advertising in children's magazines only).
- Three countries prohibit alcohol advertising in cinemas entirely (Lithuania, Norway and France), while Ireland prohibits advertising at films unless they are certified as 18 years or above, as does Finland for mild alcohol (strong alcohol advertising is prohibited in cinemas).
- Three countries (Lithuania, France and Norway) prohibit alcohol sponsorship of sports and events such as festivals, while others have partial bans, typically depending on the extent to which the event is attended or performed by children. Ireland has a ban on alcohol advertising in or on a sports area during a sporting event.

Restrictions on product packaging and sales practices

- Several of the reviewed countries require health warnings on product packaging. Specific pieces of health information mandated by one or more countries include: highlighting the risks of drinking while pregnant, including the risk of foetal cancer; listing calorie content; and providing web addresses for further information.

- Estonia and Ireland require that alcohol in retail premises is kept in an area that is physically separated from other groceries and not visible from other areas. This is intended to discourage impulse purchases and the purchase of alcohol as part of regular grocery shopping, and to reduce the visibility of alcohol to children.
- Norway has specific provision prohibiting advertising of other goods with the same brand or characteristics as alcoholic beverages. The purpose of this is to prohibit advertising for no-alcohol or low-alcohol drinks sold under the same brand name as stronger alcoholic products. This also covers foodstuffs and clothing.¹³

Variation by product strength

- Countries differ in what strength of alcohol product is covered by marketing restrictions, ranging from products over 0.5% ABV (which applies to beer in Lithuania, Ireland and Estonia) to products over 2.5% ABV (e.g. Norway and Sweden). Some countries imposed different restrictions on different strengths of product.
- In Finland, marketing of spirits (more than 22% ABV) is banned across all media with limited exceptions. Marketing of mild alcoholic beverages (a maximum of 22% ABV) is permitted, but with exceptions based on time of broadcast, audience and content.
- In Sweden, restrictions are stricter for products exceeding 15% ABV than for drinks with lower alcohol content. Marketing restrictions do not cover 'light' drinks (a maximum of 2.25% ABV), except that advertising for these products must not be able to be confused with advertising for stronger products.

Monitoring and enforcement

- Countries vary in the extent to which monitoring and enforcement of compliance with restrictions is performed by statutory bodies, non-statutory bodies or a combination of both. The information is summarised in Table 2.
- In most countries, both statutory and non-statutory bodies are involved in monitoring and enforcement.
- In Finland, Norway and Sweden, monitoring and enforcement are performed solely by statutory bodies that can issue strong penalties for unlawful marketing, including revoking licences and imposing fines or jail sentences.
- Non-statutory bodies are typically funded by the advertising or alcohol industries, provide guidance on advertising practices, and can demand removal of unacceptable marketing and potentially issue fines or escalate issues to statutory bodies. For example, the Advertising Standards Authority for Ireland is funded by the advertising industry and has powers to issue fines and suspend or expel member organisations.
- There was little mention of international cooperation on monitoring and enforcement, which may be relevant to online and broadcast marketing, as these can be accessed beyond the borders of their countries of origin.

Evaluations of restrictions

Few comprehensive evaluations were identified around alcohol advertising even though many restrictions had been in place for decades. Marketing restrictions were often introduced alongside other changes to alcohol legislation, making it challenging for research to pinpoint the effects of marketing restrictions alone. This highlights the need for built-in monitoring and evaluation plans to accompany any new alcohol restriction policies. The limited evidence that was identified is summarised below.

- There is strong evidence that Norway's 1975 ban on alcohol advertising had a significant, immediate and sustained 7.4% reduction in sales.¹⁴

- Lithuanian evidence suggests the country's strong marketing restrictions may have reduced alcohol use and harms, including alcohol-related traffic harm,¹⁵ alcohol-related mortality¹⁶ and all-cause mortality.¹⁷ One good-quality study observed broadly positive changes in years of potential life lost from alcohol-related injuries, but also observed an increase in alcohol-related suicides among men, although the authors note that the 2008 recession may have contributed to this.¹⁶
- Finland's relatively recent restrictions have not been studied extensively. One study of older restrictions on alcohol marketing on social media found that alcohol brands posted less frequently on Finnish social media platforms after restrictions were introduced. However, user engagement (shares, likes, comments and retweets) increased, and the authors suggest that marketers learned to use social media more effectively despite restrictions.¹⁸
- In Ireland, a study presented limited evidence that participants' self-reported awareness of various types of alcohol marketing decreased following the recent restrictions, and that awareness of marketing is correlated with higher-risk consumption.¹⁹

Limitations

- The review was limited to English-language information and limited use of online translation.
- Identifying relevant documents was complicated by differences in terminology between countries. Some literature was incomplete and conflicting, particularly where legislation had been amended over time.
- Documents explaining the rationale for introducing changes in legislation may not be publicly available.
- This report is limited to restrictions mentioned in the documents reviewed. There may be other marketing restrictions in place that are not reported here.

- The review found few evaluations of alcohol marketing restrictions. International reviews have found similarly few evaluations of the impacts of alcohol restrictions, and little evidence for or against such measures.⁹ The relationships between marketing and alcohol-related behaviours and harms are complex and challenging to evaluate robustly,²⁰ particularly in countries where many amendments to restrictions have been made in a short period of time.
- The review does not consider how the cultural, demographic and policy-making contexts of countries relate to their alcohol marketing restrictions. For example, stricter regulation may be more accepted in countries with well-established state regulation of alcohol, such as those with state monopolies on alcohol retail.
- The scope of the review did not include identifying possible loopholes that exist in restrictions and how countries have addressed those loopholes. Similarly, the literature reviewed does not investigate the challenge of using national legislation to control marketing on the ‘borderless’²¹ internet and social media.

Glossary

ABV (alcohol by volume): an international standard measure of the strength of alcoholic products, indicating the proportion of a beverage that is pure alcohol (ethanol).

Regulation: rules guiding or constraining the actions of certain individuals, organisations or groups.

Restrictions: regulations that limit the subject's ability to take certain actions, such as restrictions on retailers' ability to sell alcohol at certain times of day.

Statutory regulation: regulation that is put into law through government legislation, and often more forceful than non-statutory regulation, such as voluntary industry codes of practice.

Table 1: Summary of restrictions

Symbol	Meaning
○	No restrictions/no information found
◐	Partial restrictions in this media type (e.g., contingent on strength of alcohol, time of day or content restrictions)
●	Outright ban in this media type

Country	Advertising content	Affected products; ethanol content	Promotion: Broadcast (TV, radio)	Promotion: Online & social media	Promotion: Outdoor	Promotion: Print	Promotion: Cinema	Promotion: Sports and event sponsorship	Promotion: Branded merchandise	Promotion: Competitions	Product: Mandatory health warnings	Place: Retail placement and display
Estonia	Restricted to factual product information	Beer > 0.5% ABV and other liquids > 1.2% ABV	◐	◐	●	◐	◐	◐	○	●	●	◐
Finland	Restricted	> 1.2% ABV (any alcohol) > 22.0% ABV (spirits)	◐	◐	●	◐	◐	◐	◐	●	○	◐
France	Restricted to factual product information	> 1.2% ABV	◐	◐	◐	◐	●	●	◐	○	●	◐
Ireland	Restricted to factual product information	Beer > 0.5% ABV, other spirits > 1.2% ABV	◐	○	◐	◐	◐	◐	◐	◐	●	◐
Lithuania	Outright ban	Beer > 0.5% ABV, other spirits > 1.2% ABV	●	●	●	●	●	●	●	●	◐	○
Norway	Outright ban	> 2.5% ABV	●	◐	●	◐	●	●	◐	○	○	◐
Sweden	Restricted to factual product information	> 2.5% ABV (any alcohol) > 15.0% ABV (spirits)	●	◐	◐	◐	◐	○	○	●	●	○

The **full report** can be found on the Public Health Scotland website.

Table 2: Monitoring and enforcement of alcohol marketing restrictions

Country	Monitoring and enforcement bodies	Statutory control?	What sanctions are possible?
Estonia	Estonian Consumers' Union; Estonian Police and Border Guard Board	Yes	Fines
Finland	Finnish National Supervisory Authority for Welfare and Health (Valvira) is responsible at national and cross-regional levels, with regional authorities responsible for monitoring the marketing promotion of alcohol within regional boundaries	Yes	Temporary bans on marketing (with or without a penalty payment); suspending licenses, fines or imprisonment by a Court
France	Statutory: Court of Justice. Non-Statutory Monitoring: Authority for Professional Regulation of Advertising (ARPP) (funded by advertising industry); Associations Addictions France (AAF)	Mixed	The Court of Justice presides over legal cases relating to violation of the law. Specific sanctions are unknown
Ireland	Statutory: Environmental Health Service. Non-statutory: Advertising Standards Authority for Ireland (ASAI) (funded by advertising industry)	Mixed	Environmental Health Service: fines or imprisonment. ASAI: issue fines; suspend or expel member organisations
Lithuania	Drug, Tobacco and Alcohol control Department (NTAKD); National Consumer Rights Protection Board (NCRB)	Yes	NTAKD can have advertising removed via court order, with decisions issued within 3 days; NCRB can issue fines or suspend licenses
Norway	Directorate for Health; regional authorities	Yes	Fines; imprisonment; suspending licenses
Sweden	Swedish Consumer Agency; regional authorities	Yes	Fines; revoking licenses

Appendix A: Search strategy

Countries included

Estonia, Finland, France, Ireland, Lithuania, Norway and Sweden. These countries were selected by the project advisory group to capture a diverse range of current alcohol marketing restrictions currently implemented across Europe.

Search terms

Search terms used were combinations of the key words for each country:

Alcohol AND (marketing OR advertising AND Legislation OR Regulation OR Monitoring OR Enforcement) AND [country name] OR [name of relevant legislation (where known)]

AND

“Alcohol Policy” AND [country name]

Organisational sources for targeted grey literature search

- **European Centre for Monitoring of Alcohol Marketing (EUCAM)**
- **World Health Organization**
- **EuroHealthNet**
- Relevant national government and health department websites
- Relevant non-governmental organisations, e.g.:
 - **Alcohol Action Ireland**
 - **Addiction Association France**

- **Avogtil** and **ACTIS, Norwegian Policy Network on Alcohol and Drugs**
- **IOGT-NTO** in Sweden
- **EHYT** the Finish Association for Substance Abuse Prevention

Databases searched

Scopus, Medline, Proquest Public Health, ASSIA, Sociological Abstracts.

Timeframe for searches

Database searches were run from 2005 as relevant information prior to this was captured through a 2-year EU-funded project which assessed and reported on the enforcement of national laws and self-regulation of alcohol marketing in the EU and Norway.²² No time limits were set for grey literature searches. Where the date for current regulation was identified for a given country, only data sources from this point in time were incorporated in that country's case study.

Inclusion criteria

- Documentary evidence where the main focus of source is to describe alcohol marketing restrictions in relevant country or how compliance with restrictions is monitored and enforced or national-level evaluation of impact of marketing restrictions on alcohol sales or alcohol-related harm.
- Official government papers.
- Published academic reports.
- Peer-reviewed literature.
- Reports from relevant identified third sector organisations.

Exclusion criteria

- Non-English language publications where website translation facility is not available.
- Studies or publications not specific to the countries of interest or across wider geographical areas, e.g. pan-European.
- Publications or reports not relevant to current alcohol restrictions.
- Media and alcohol industry publications or reports.
- Evaluations of sub-elements of enacted restrictions.

References

- ¹ World Health Organization. **Global strategy to reduce the harmful use of alcohol**. World Health Organization; 2010.
- ² World Health Organization. **WHO framework convention on tobacco control**. Geneva: World Health Organization; 2003.
- ³ World Health Organization. **European action plan to reduce the harmful use of alcohol 2012-2020**. World Health Organization; 2012.
- ⁴ Chisholm D, Moro D, Bertram M, et al. Are the “best buys” for alcohol control still valid? an update on the comparative cost-effectiveness of alcohol control strategies at the global level. *Journal of Studies on Alcohol and Drugs* 2018;79(4):514–522.
- ⁵ Esser MB, Jernigan DH. Policy approaches for regulating alcohol marketing in a global context: a public health perspective. *Annual Review of Public Health* 2018; 39:385–401.
- ⁶ Harris F, MacKintosh AM, Anderson S, et al. Effects of the 2003 advertising/promotion ban in the United Kingdom on awareness of tobacco marketing: findings from the International Tobacco Control (ITC) Four Country Survey. *Tobacco Control* 2006;15(Suppl 3):iii26–33.
- ⁷ Ford A, MacKintosh AM, Moodie C, et al. Impact of a ban on the open display of tobacco products in retail outlets on never smoking youth in the UK: findings from a repeat cross-sectional survey before, during and after implementation. *Tobacco Control* 2020;29(3):282–288.
- ⁸ Saffer H, Chaloupka F. The effect of tobacco advertising bans on tobacco consumption. *Journal of Health Economics* 2000;19(6):1117–1137.

- ⁹ Siegfried N, Pienaar DC, Ataguba JE, et al. Restricting or banning alcohol advertising to reduce alcohol consumption in adults and adolescents. *Cochrane Database Systematic Review* 2014;(11):CD010704.
- ¹⁰ Scottish Government. **Alcohol Framework 2018**. Edinburgh: Scottish Government; 2018.
- ¹¹ Institute of Alcohol Studies. **Alcohol and marketing**; 2020.
- ¹² Kauppila E, Lindeman M, Svensson J, et al. **Alcohol marketing on social media sites in Finland and Sweden. A comparative audit study of brands' presence and content, and the impact of a legislative change**. Faculty of Social Sciences, University of Helsinki, Finland; 2019
- ¹³ Norwegian Health Directorate. **The Alcohol Act**. Chapter 9.2 advertising bans.
- ¹⁴ Rossow I. The alcohol advertising ban in Norway: effects on recorded alcohol sales. *Drug and Alcohol Review* 2021;40(7):1392–1395.
- ¹⁵ Rehm J, Manthey J, Lange S, Badaras R, Zurlyte I, Passmore J, et al. Alcohol control policy and changes in alcohol-related traffic harm. *Addiction* 2020; 115(4):655–665.
- ¹⁶ Stumbrys D, Telksnys T, Jasilionis D, et al. Alcohol-related male mortality in the context of changing alcohol control policy in Lithuania 2000-2017. *Drug and Alcohol Review* 2020;39(7):818–826.
- ¹⁷ Štelemėkas M, Manthey J, Badaras R, et al. Alcohol control policy measures and all-cause mortality in Lithuania: an interrupted time-series analysis. *Addiction* 2021; 116(10):2673–2684.
- ¹⁸ Katainen A, Kauppila E, Svensson J, et al. Regulating alcohol marketing on social media: outcomes and limitations of marketing restrictions of Finland's 2015 alcohol act. *Journal of Studies on Alcohol and Drugs* 2020;81(1):39–46.

¹⁹ Critchlow N, Moodie C. Awareness of alcohol marketing one year after initial implementation of Ireland's Public Health (Alcohol) Act and during the COVID-19 pandemic. *Journal of Public Health* 2021;1–11.

²⁰ Petticrew M, Shemilt I, Lorenc T, et al. Alcohol advertising and public health: systems perspectives versus narrow perspectives. *Journal of Epidemiology and Community Health* 2017;71(3);308–312.

²¹ Room R, O'Brien P. Alcohol marketing and social media: a challenge for public health control. *Drug Alcohol Rev* 2021;40(3):420–422.

²² ELSA (Enforcement of National Laws and Self-Regulation on Advertising and Marketing of Alcohol) [Internet]. **Utrecht: Dutch Institute of Alcohol Studies.**