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# **Embracing the non-traditional**

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# Embracing the non-traditional: alcohol advertising on TikTok

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# **BACKGROUND**

Alcohol companies are changing the way they market their products. Cross-border promotion and 'programmatic native advertising' that is data-driven and participatory is more common.<sup>1</sup> This form of advertising is particularly attractive because it reflects the way alcohol companies are organised. As a globally consolidated industry that is dominated by a few large corporations using a form of promotion that is not limited to one region or context is efficient and convenient. The alcohol market is crowded and the way consumers access and drink alcohol has been influenced by the pandemic with a rise in at-home drinking and buying alcohol online.<sup>2</sup> These factors result in a market that encourages companies to develop new and innovative ways to engage consumers. Social media presents such an opportunity, to the detriment of young people. Alcohol is a 'commodity of concern to public health'.<sup>3</sup> Among 15–49-year-old people, 3.8% (95%) UI 3.2% to 4.3%) of female deaths and 12.2% (10.8% to 13.6%) of male deaths were attributable to alcohol use globally in 2016.4 Studies have consistently shown that those who start drinking alcohol early are more likely to display hazardous drinking in later life. Marketing that targets young people is a particular concern because evidence indicates that exposure to alcohol marketing during youth is associated with an earlier onset of drinking.6 Marketing refers to 'any form of commercial communication or message that is designed to increase—or has the effect of increasing—the recognition, appeal and/ or consumption of particular products and services. It comprises anything that acts to advertise or otherwise promote a product or service'.

When the executive board of the WHO requested the director general to develop an action plan (2022–2030) that would effectively implement the global strategy to reduce the harmful use of alcohol they also

#### SUMMARY BOX

- ⇒ TikTok is a rapidly growing short video social media platform with over 1 billion active monthly users as of June 2022. Approximately 63% of users on TikTok are under the age of 29 and 28% are under 18. Due to TikTok's young user base—alcohol advertising is largely banned by the platform's guidelines and policies.
- ⇒ Limited research exists investigating alcohol advertising or promotion on TikTok. The evidence available suggests alcohol is portraved positively. No research examines the potential financial drivers of alcoholrelated content, including advertising, on TikTok.
- ⇒ We identify five categories with examples of alcohol advertising on TikTok requiring further investigation, including: direct influencer advertising, the presence of alcohol companies or service accounts, online bartenders, indirect alcohol sponsorship via creator page links and user-generated content.

requested 'a technical report on the harmful use of alcohol related to cross-border alcohol marketing, advertising and promotional activities, including those targeting youth and adolescents'. This has now been published. It is an important contribution that provides a framework for how to think about crossborder marketing and promotion in a modern world. There is a dedicated section on peer-topeer marketing, social media influencers and cross-border implications.<sup>3</sup> It ends by highlighting that 'despite there being increasing evidence documenting the amount of alcohol marketing through social media, to date, there is limited evidence documenting and/ or monitoring the techniques of social media influencer advertising of alcohol products. Much of the research focuses on the types and effects of such advertising, with limited attention to how social media influencers and brands interact in producing social media influencer advertising'.

TikTok is a social media platform centred on creating, sharing and engaging with short videos and has over a billion monthly active users, but there is limited (but growing)



empirical research exploring the portrayal or impact of health-related content. 10 Some suggest TikTok can be used to communicate important health information, catalyse the coproduction of health knowledge 11 12 or find community, 11 but there are also serious concerns. A study analysing 100 trending videos with the hashtag 'covidvaccine' found the videos collectively received 35 million views, and 38 videos 'discouraged vaccines' while 36 videos 'encouraged vaccines' (however the 'encouraged vaccines' videos did acquire over 50% of the views and likes). 13 Similar misleading content has been found in topic areas such as prostate cancer, eating disorders and attention deficit hyperactivity disorder (ADHD). 14-16 Positive portrayal of health-harming products has been found for vaping and alcohol. <sup>17</sup> <sup>18</sup> In one study, the majority (63%) of 808 videos involving e-cigarettes and vaping products portrayed them positively. Collectively, these videos had been viewed more than a billion times. The considerable potential to harm health through the positive portrayal of health-harming products, such as alcohol, warrants attention.

Approximately 63% of users on TikTok are under the age of 29 and 28% are under 19.9 Because of the young (under the legal drinking age in many countries) users on TikTok, the company has avoided alcohol advertising across most contexts. However, the vague nature of some of TikTok's guidelines (see online supplemental file 1) means many under drinking age users may have already been exposed to alcohol advertising or promotion<sup>20</sup> through non-traditional avenues.

Here, we explore TikTok's community guidelines and ad/branded content policies related to alcohol and provide examples of alcohol promotion and portrayal which demand further investigation. Full TikTok alcoholrelated guidelines and policies can be found in online supplemental file 1. The guidelines are far-reaching and prohibit content promoting, enabling or encouraging alcohol consumption by minors. The examples below of alcohol marketing or promotion demonstrate the limitations and/or lack of compliance of current content guidelines, policies and enforcement. We suggest nontraditional forms of alcohol advertising fall into five distinct categories.

# **ALCOHOL ADVERTISING AND PROMOTIONAL STRATEGIES**

# Presence of brand influencers directly advertising alcohol

There is evidence of direct influencer advertising, seemingly against branded content policies. Some influencer advertising are from TikTok's top influencers who have verified accounts. This normally takes the shape of short posts that advertise or feature a particular brand or store. There is currently no research in this area so the extent of this practice in terms of reach, particularly to under drinking age consumers, is unclear, but of considerable concern given the levels of engagement and followers of such accounts. For example, Jason Derulo, who is the 15th most followed person (52.5 million followers) on

TikTok, announced a partnership with Bedlam Vodka in November 2020. In total, he has posted 9 videos promoting Bedlam Vodka, totalling 88700000 views, 10228000 likes, 64251 comments and 42109 shares. These videos not only promote the brand but also promote the product in a way that is fun and engaging to a youth and minor audience.

# Alcohol company or service accounts

Alcohol brands and services run their own TikTok accounts against global branded content policies. It appears that large companies are tending to avoid this approach perhaps because of fear of fines for advertising to an under drinking age audience (as was seen with SnapChat and Diageo<sup>18</sup>). However, smaller companies with more to gain and less to lose are practicing this. Multiple small companies advertising in this way make such advertising hard to track, with cumulative effects in overall exposure of young people to prodrinking messages. These companies promote their brand by making entertaining branded content that does not directly advertise the product but ensures brand awareness and tries to garner brand loyalty and engagement. Account pages may link directly to websites where users can purchase their products. Such links contravene guidelines as they are essentially using the platform to link to trading alcohol.

# Online bartenders and drink making

Popular bartender influencers give instructions on how to make alcoholic drinks such as cocktails. Videos often feature the same branded products, both alcoholic and not, raising questions about whether bartenders are paid to place these products or if they are getting the products for free (either alcohol directly or toolkits to make drinks). Some accounts seem to have business contact details for brand deals. Many videos use candy and appealing flavours or themes that might appeal to a minor audience. This is arguably in breach of guidelines because it reasonably can be perceived as promoting the possession of alcohol by minors. The videos are intended to be fun and engaging and thereby may encourage underage alcohol use, outside of settings such as bars and clubs. Further, such videos glorify alcohol use. The reach of online bartenders making drinks is large. Tipsy Bartender, who is one of the most followed bartenders on TikTok (7.2 million followers), advertises 'brand deals', and has posted 513 videos totalling 947 430 700 views.

# Links to alcohol-related content in user profiles

Some TikTok users use their profile page to direct their audience to sites selling alcohol. This is normally in the form of a direct link. Here, creators may not reference an alcoholic product or service across their content, but if a viewer visits their profile and clicks on their biography link, it may direct or promote a specific alcohol brand or service. This also makes the platform part of the trade of alcohol.

# User-generated alcohol-related content

User-generated content refers to videos that are made by users, featuring users, and can link to a particular theme or brand. Alcoholic brands are often promoted via usergenerated content including general mentioning of alcohol brands or by alcohol-related trends. For example, the 'beer poster trend'—a TikTok challenge where users pose for a mock photo shoot with a beer brand—garnered over 800+ million views across tagged content. Similarly, alcohol brand-specific hashtags receive millions of views. This content may not necessarily be promotional material from any alcohol company but can be developed in response to an event or through users who start a trend that takes off and engages millions of users. As discussed earlier—evidence currently suggests smaller brands may use hashtags to promote their brand, which is then amplified by organic users. Content enforcement at present focuses on preventing minors from being depicted in the content but does not focus on limiting minors being exposed to such content. Some studies indicate that usergenerated content is an important influence in hazardous consumption practices.<sup>21 22</sup>

#### CONCLUSION

Despite the health-harming impact of alcohol, controls on traditional marketing are generally weaker than other psychoactive substances.<sup>23</sup> Non-traditional, crossborder avenues of marketing result in a further layer of complexity that are difficult to document and research particularly on social media where the sheer number of user-made content make it difficult to track. Here, we have focused on TikTok because of the asymmetry between the number of users it has and the amount of research done on how the platform influences health.<sup>10</sup> There are major implications for policymakers. Current TikTok guidelines are insufficient to safely guard minors from the promotion of alcohol. We have demonstrated five categories in which alcohol is currently promoted to minors. Acknowledging these categories will provide a first step to monitoring them. However, given the fastpaced nature of TikTok and the changes that can develop through trends, these categories may change. Further, there are difficulties for researchers to determine which demographics are seeing these adverts due to the algorithmic directed nature of TikTok. The public health community now needs to focus on research and tools that will allow better insights and accurate monitoring as a matter of urgency.

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