

Response ID ANON-1NVJ-ETSE-G

Submitted to Alcohol advertising and promotion
Submitted on 2022-12-01 18:05:31

Declaration of direct or indirect links to the alcohol industry

1 Please indicate any direct or indirect links to the alcohol industry?

No links

Please provide any further information below:

Why do we need to take action?

What is the current regulatory system?

Sports and events sponsorship

2 Do you think we should prohibit alcohol sports sponsorship in Scotland?

Yes

Please explain your answer in the text box:

Looking at the evidence around alcohol marketing, it would appear that sponsorship of sports teams or competitions is more likely than not to encourage harmful alcohol use by creating positive associations likely to drive increased consumption.

We note that previous research (1) has indicated a significant link between high levels of alcohol consumption around certain sporting events (e.g. Old Firm games and Scotland vs England fixtures) and increased reports of domestic violence. We recognise that this is complicated and the veracity of those links remains open for discussion (2).

We previously interviewed Dr Marsha Scott of Scottish Women's Aid (3) and asked her about this link. She explained that reports of domestic violence more likely tended to increase where abusive partners had consumed more alcohol as they tended to lose control of themselves and inflict more severe injuries which required A&E visits, or resulted in increased levels of noise disturbance - making police involvement more likely.

Whatever the nuances of the role of levels of alcohol consumption vs personal responsibility for abusive behaviour - we nonetheless believe alcohol to be an aggravating factor in sports related increases in domestic violence.

We similarly believe that alcohol consumption (and the positive associations with sport that fuel it) can be an aggravating factor in increases in violence, anti-social behaviour and hate crime in Scotland.

Additionally, we feel that sports sponsorship by the alcohol industry seems to be in direct opposition to the idea of sport as a means of improving health & wellbeing - either via physical exercise or building positive social relationships.

We know that alcohol is a class 1 carcinogen which causes numerous other severe health problems and is strongly implicated in or aggravates other social problems.

We would not be asking this question anymore regarding tobacco. We feel that in years to come it will seem equally strange that we ever asked this question relating to alcohol. The fact that there is a debate around this despite what we know about the problems caused by alcohol - is likely indicative of the continued and illogical position of social privilege alcohol continues to enjoy in our culture in comparison with other drugs (some of which are significantly less harmful to the individual or society).

(1) - <https://journals.sagepub.com/doi/full/10.1177/2158244013504207>

(2) - <https://www.heraldscotland.com/news/16401737.domestic-violence-link-old-firm-games-may-myth-according-research/>

(3) - <https://www.youtube.com/watch?v=0XdAgcRtB3Y>

3 If alcohol sponsorship for sports was to be prohibited, what types of marketing do you think should be covered by a prohibition?

Please add your response in the text box:

We believe there should be a total ban on any and all forms of alcohol sponsorship of sport, competitions and sport teams.

4 What, if any, sporting activities or events do you think should be excepted from a prohibition on alcohol sports sponsorship, and why?

Please add your response in the text box:

No exceptions.

5 Do you think we should prohibit alcohol events sponsorship in Scotland?

Yes

Please explain your answer in the text box:

We believe that allowing sponsorship of events by the alcohol industry helps to perpetuate the idea that the alcohol industry has a social conscience or is beneficent.

A 2018 study (1) showed in England, the alcohol industry appears to be highly financially dependent upon heavy drinking, and might face significant financial losses were consumers to drink within guideline levels.

This calls into serious question the idea that the alcohol industry is genuinely motivated by a desire to work for the health & wellbeing of society when it sponsors events - as opposed to laundering it's reputation or, if we were being more generous, attempting to offset health & social harms caused by the products it markets and sells.

It also calls into question their genuine commitment to advocating for 'responsible drinking' - which health professionals would tend to define by the Chief Medical Officers Guidance.

(1) - <https://pubmed.ncbi.nlm.nih.gov/30136436/>

6 If alcohol events sponsorship were to be prohibited, what types of marketing do you think should be covered by a prohibition?

Please add your response in the text box:

Any and all forms of event sponsorship.

7 What, if any, events do you think should be excepted from a prohibition on alcohol events sponsorship, and why?

Please add your response in the text box:

No exceptions.

8 If alcohol sponsorship restrictions are introduced, do you think there should be a lead in time for these?

Yes

Please explain your answer in the text box:

We wouldn't be able to give an adequate response to this question as regards to lengths of time, but in principle we would not be against a lead in time for new prohibitions on sponsorship.

We agree this would be a significant undertaking and may cause a significant deal of harm to businesses if changes came into immediate effect. It seems reasonable to allow businesses time to prepare for these changes coming into effect.

Outdoor and public spaces marketing

9 Do you think we should prohibit alcohol marketing outdoors, including on vehicles, and in public spaces in Scotland?

Yes

Please explain your answer in the text box:

For reasons outlined in the first section of this consultation, we believe that alcohol marketing should be treated in the same way as tobacco marketing and be subject to a total ban of any and all forms of marketing.

In 2010 - an assessment of the various harms of drugs used recreationally in the UK (1) using multi-criteria decision analysis (a method that uses relevant experts' knowledge and experience to assess the actual and relative harms) found that taking into account both harm to the individual and society - alcohol is THE most harmful drug ahead of heroin and crack cocaine.

We cannot see any reason why continued marketing of this drug should be socially acceptable.

(1) - https://www.thelancet.com/journals/lancet/article/PIIS0140-6736%2810%2961462-6/fulltext#article_upsell

10 What do you think should be covered by a prohibition on alcohol marketing outdoors, on vehicles and in public spaces?

Please add your response in the text box:

Any and all forms of alcohol marketing anywhere should be prohibited.

11 What, if any, exceptions do you think there should be to prohibiting alcohol marketing outdoors, including on vehicles, and in public spaces in Scotland? Why?

Please add your response in the text box:

No exceptions.

In-store alcohol marketing

12 Do you think that we should further restrict the visibility of alcohol in retail environment?

Yes

Please add your response in the text box and explain your answer:

For reasons and based on evidence we have previously submitted, we would strongly support treating alcohol the same as tobacco - and covering alcohol behind till areas.

We would not be supportive of any form of display or marketing within stores.

13 Do you think we should consider structural separation of alcohol in Scotland to reduce the visibility of alcohol in off-trade settings (e.g. supermarkets)?

Don't know

Please explain your answer in the text box:

Structural separation would be a good move in the right direction but we would not support any form of alcohol advertising anywhere - including in stores.

We note recent pilots in the Netherlands (1) of what stores vending MDMA could possibly look like, with options including more of pharmacy type store which would not feature advertising or open displays and would require open display of harm reduction information (with a requirement that customers watch a short harm reduction video before completing a purchase).

Whilst we recognise a sudden change to a system like this for selling alcohol would seem outrageous to many - we believe it would be supported by the evidence that alcohol is the most harmful drug of all when individual health and social harms are weighed together.

(1) - <https://www.theguardian.com/world/2022/aug/18/high-street-dutch-ecstasy-shop-shows-possible-way-for-drug-reform-xtc>

14 How do you think structural separation of alcohol in Scotland could operate? (e.g. with barriers, closed display cases)

Please add your response in the text box:

We would leave these deliberations to those more expert - but reiterate that we would prefer a total ban of alcohol displays.

Brand sharing and merchandise

15 Do you think that we should prohibit the sale of alcohol branded merchandise in Scotland?

Yes

Please explain your answer in the text box.:

16 Do you think that we should prohibit the free distribution of alcohol branded merchandise in Scotland?

Yes

Please explain your answer in the text box.:

17 What, if any, exceptions do you think should there be to prohibiting the sale or distribution of alcohol branded merchandise?

Please provide your answer in the text box.:

No exceptions.

18 What, if any, other restrictions do you think should be considered on the use of alcohol brands on non-alcohol products?

Please provide your answer in the text box.:

We support any and all restrictions that could be implemented on the use of alcohol brands anywhere.

No and low alcohol

19 Do you think that any potential alcohol marketing restrictions should apply to low or no alcoholic drinks products, where these carry the same brand name, or identifiable brand markings, as alcoholic drinks?

Yes

Please answer in the text box below.:

Print advertising

20 Do you think that we should prohibit advertising of alcohol in newspapers and magazines produced in Scotland?

Yes

Please explain your answer in the text box:

21 What, if any, exceptions do you think there should be to prohibiting alcohol advertising in newspapers and magazines produced in Scotland?

Please add your response in the text box:

No exceptions.

Online marketing

22 Do you think we should restrict alcohol branded social media channels and websites in Scotland?

Yes

Please explain your answer in the text box.:

23 What, if any, exceptions do you think there should be to prohibiting alcohol branded social media channels and websites in Scotland?

Please add your response to the text box.:

No exceptions.

24 Do you think we should restrict paid alcohol advertising online in Scotland?

Yes

Please explain your answer in the text box.:

25 What types of paid alcohol advertising online do you think should be covered by any restrictions?

Please add your response in the text box.:

All types.

26 What, if any exceptions, do you think there should be to restricting paid alcohol advertising online?

Please add your response in the text box.:

No exceptions.

27 Do you think we should restrict alcohol companies from sharing promotional content on social media (e.g. filters, videos or posts) - whether this is produced by them or by consumers?

Yes

Please explain your answer in the text box.:

28 What, if any, exceptions do you think there should be from restricting alcohol companies from sharing promotional content on social media (e.g. filters, videos or posts) - whether this is produced by them or by consumers?

Please add your response in the text box.:

No exceptions.

Television and radio advertising

29 Do you think we should explore prohibiting alcohol advertising on television and radio completely (e.g. like Norway or Sweden)?

Yes

Please explain your answer in the text box.:

30 Do you think we should introduce a watershed for alcohol advertising on TV and radio (e.g. like Ireland)?

No

Please explain your answer in the text box.:

We should introduce a total ban.

Cinema advertising

31 Do you think alcohol advertising should be restricted in cinemas?

Yes

Please explain your answer in the text box:

32 If alcohol advertising was restricted in cinemas, what, if any exceptions (e.g.products in scope, times of day, or specific movie ratings) do you think should be considered?

Please add your response in the text box:

No exceptions.

Restrictions on content of advertisements

33 Do you think that the content of alcohol marketing in Scotland should be restricted to more factual elements?

Don't Know

Please explain your answer in the text box.:

As a first step, we might support this.

However, we see no good reason not to move towards a complete ban on alcohol advertising whilst mandating the alcohol industry to include full nutritional/health information on products along with health warning labels like those on tobacco products.

34 Do you think we should only allow alcohol marketing to include elements set out in a list, like in Estonia? This would mean all other elements not on the list would be banned from adverts.

Don't know

Please explain your answer in the text box.:

See response to previous question.

35 Do you think that content restrictions, like the Estonia model, should be applied to all types of alcohol marketing?

Don't know

Please explain your answer in the text box.:

See response to first question in this section.

Enforcement and evaluation

36 How do you think that any future alcohol marketing restrictions in Scotland should be monitored and enforced?

Please add your response in the text box:

We do not feel well positioned to give a meaningful answer to this question save to say that we'd support some form of statutory regulation with meaningful/consequential penalties for breaches.

37 Do you think that Scottish Government should require the alcohol industry to provide information and data on alcohol marketing campaigns in Scotland?

Yes

Please explain your answer in the text box:

38 Do you think that Scottish Government should require the alcohol industry to provide local alcohol sales data in Scotland?

Yes

Please explain your answer in the text box:

End questions

39 Do you think the Scottish Government should look to introduce a comprehensive package of restrictions across a number of marketing channels? If so, what do you think this package should include?

Yes

Please explain your answer in the text box:

We support a total ban on all forms of alcohol advertising or open display similar to that employed against tobacco products.

In previous questions we have laid out evidence and rationale for why we support a total ban on all alcohol advertising.

Alcohol has been shown to be THE most harmful drug when harms to individual and society are weighted together - ahead of heroin and crack cocaine.

Alcohol is strongly implicated in, or an aggravating factor in, many forms of crime (domestic abuse, violence, homicide, sex crime and anti-social behaviour). It therefore makes our communities less safe. We say this whilst noting/acknowledging that problematic alcohol use is strongly tied together with inequality, poverty, trauma and stress. A coherent response to problematic alcohol use, and its impact on community safety, must also seek to tackle the other underlying causes of problematic or dependent drinking.

The alcohol industry aggressively markets and has a financial incentive, if not imperative, in encouraging increased consumption. This is not consistent with making communities safer, or people in Scotland leading healthier lives.

40 What, if any, additional alcohol marketing methods or channels not covered in the consultation would you like Scottish Government to consider restricting?

Please add your response in the text box:

We can't think of any but we would support all restrictions on any marketing method or channel.

41 What further evidence on alcohol marketing you would you like the Scottish Government to consider?

Please explain your answer in the text box:

N/A

42 If you sell, distribute, advertise or manufacture alcohol, or represent those who do, how do you think the potential restrictions in this consultation paper would impact you, and the wider alcohol sector?

Please add your response in the text box:

N/A

43 Are there any relevant equality issues that Scottish Government should be considering at this stage in the policy development?

Please add your response in the text box:

Yes.

The alcohol industry is already exploiting the increasing market for consumption from women. The Scottish Government should take into consideration work being done by Professor Carol Emslie at Glasgow Caledonian University and the 'Don't Pink My Drink' campaign (1).

Women already experience greater health and social inequalities, as well as differences in their bodies, which may make them more vulnerable to health and social harms of problematic alcohol use. You may wish to read the book 'Women of Substances' by Jenny Valentish for more on this.

The Scottish Government should also consider long standing and increasing alcohol industry sponsorship and marketing to the LGBTQI community. The LGBTQI community experiences greater harms around alcohol and drugs than the rest of the population due to vulnerabilities caused by discrimination,

stigma and stress caused by LGBTQI-phobia - and social norms in the LGBTQI community with the central role pubs and clubs hold/have traditionally held as 'safe' community spaces. See the KinderStrongerBetter partnership website for much more on this. (2)

Dr David Whitely of Glasgow Caledonian University is currently leading research on how alcohol is marketed to the LGBTQI community (3) - which will be completed and published in 2023.

(1) - <https://www.gcu.ac.uk/aboutgcu/universitynews/2021-professoriallecture-carolemslie>

(2) - <https://kinderstrongerbetter.org/>

(3) - <https://www.gcu.ac.uk/aboutgcu/universitynews/reach-researchers-investigate-how-alcohol-is-marketed-to-lgbtq-community>

About you

44 What is your name?

Name:

David Barbour

45 What is your email address?

Email:

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46 Are you responding as an individual or an organisation?

Organisation

47 What is your organisation?

Organisation:

The Scottish Community Safety Network

48 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

49 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

50 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

51 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: