National Institute for Health and Clinical Excellence

PUBLIC HEALTH PROGRAMME
ALCOHOL USE DISORDERS (PREVENTION)

Consultation on Additional Evidence from 4th August – 1st September 2009
Comments to be submitted by 5pm at the very latest on Tuesday 1st September 2009

Stakeholder Comments Form

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1. Please put each new comment in a new row.
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3. Please insert the **Section** and/or **Page numbers** in the 2nd and 3rd column. If your comment relates to the document as a whole, please put **'General'** in the section column
4. Please remember to insert your name and the organisation's name on the first page

Name:	**Michael Todd**		
Organisation:	**Advertising Standards Authority**		
Document Name and Number *(e.g. Evidence review 1, Economic Review, etc)*	**Section number** *Indicate **section number** or **'General'** if your comment relates to the whole document*	**Page Number**	**Comments** *Please insert each new comment in a new row.*

Please add extra rows as needed

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Public Health Guidance Scope – Part 1 (Prevention)	Section 4.8 'Key Questions and Outcomes'. Question 3 on the control of alcohol advertising	Page 8	The Advertising Standards Authority (ASA) is the UK self-regulatory body for ensuring that all advertisements, wherever they appear, are legal, decent, honest and truthful. As the UK body with responsibility for regulating all advertising, including alcohol advertising, the ASA is disappointed not to have been consulted at an early stage in regard to part 1 (Prevention) of this NICE work, which is looking specifically at the controls on alcohol advertising. In particular, the ASA believes that the work we have been doing to ensure alcohol advertising remains responsible would have been useful to NICE, prior to its earlier 'consultation on the evidence', which closed in June 2009. For these and other reasons outlined in section 1 of **Annex A**, the advertising regulatory system cannot give its endorsement of the processes undertaken by NICE to date on this work. Attached to this document at **Annex A** is an overview of the advertising regulatory system, the rules in place for alcohol advertising and the work we are doing to ensure alcohol advertisements remain socially responsible. Also in Annex A is an overview of an analysis of the review of the effects of alcohol pricing and promotion (Booth et al, 2008, or ScHARR) which was undertaken by the advertising regulatory system as part of the ongoing review of all the Advertising Codes. At **Annex B** is a more detailed synopsis of the advertising regulatory system and the sections of the UK Advertising Codes, specifically relevant to the alcohol sector.

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Alcohol-use disorders (prevention) consultation on the evidence – *Closed 17 June 2009*	Evidence on the effectiveness and cost effectiveness of controls on advertising		The ASA was not aware of this June 2009 consultation, but we believe that even at this late stage it is worthwhile highlighting the work currently being undertaken by the advertising regulatory system in this area. The ASA understands that much of the evidence on advertising in this June 2009 consultation was informed by the findings of the review by Booth et al 2008 (or ScHARR). The advertising regulatory system has, for the past 18 months been undertaking a full review of all the advertising codes, including the alcohol advertising rules, to ensure that they remain evidence based, up-to-date and fit for purpose. At the request of Government, the advertising regulatory system has specifically and separately analysed the findings of the Department of Health (DH) commissioned Sheffield Review into the relationship between price, promotion and harm (Booth et al 2008, or ScHARR) to see whether the review findings justified further changes to the advertising rules. This analysis by the system was subject to a public consultation which closed in July. All submissions, including new evidence, are now being evaluated. A summary of this analysis work is at **Annex A**. The full analysis is included at **Annex C**. Ensuring and evaluating the effectiveness of the current controls on alcohol advertising is an ongoing priority; the rules were tightened in 2005 in response to evidence. These rules are robustly enforced by the ASA and annual monitoring research shows there is high (& increasing) compliance rate across all media.

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Alcohol-use disorders (prevention): additional evidence consultation	Alcohol modelling report and appendices – modelling by Sheffield University on interventions on advertising		The ASA understands that to inform its work, NICE commissioned the University of Sheffield to undertake modelling to assess the effectiveness and cost-effectiveness of public health related strategies and interventions to reduce alcohol attributable harm in England. This modelling work has utilised modelling undertaken by the University of Sheffield through the ScHARR review (Booth et al 2008), although this NICE commissioned work utilised updated policy modelling (version 2.0) in a number of areas. In so far as it relates to advertising, the ASA sees no significant difference between the methodology and results of the DH commissioned ScHARR modelling and the work currently being considered by NICE. Both pieces of work considered the same three policy scenarios, both highlight the limitations of the current evidence base and the disagreement in the academic research literature on the effect of advertising bans. The ASA believes that the analysis of the modelling work in the DH commissioned ScHARR Review by the advertising regulatory system (**see Annex C**) can be applied directly to the modelling work in this latest Sheffield University work.

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