Pulse Report: Alcohol Advertising

A snapshot of UK online alcohol advertising compliance, using the Advertising Standards Authority's Active Ad Monitoring system, to identify issues and support responsible advertising

October 2025

Legal, decent, honest and truthful

ASA ✓

Contents

Executive summary

The ASA's current five-year strategy commits it to adopting a 'whole-system' approach to tackling advertising issues – combining proactive intelligence gathering, AI-assisted monitoring, and expert assessment to build a fuller, more accurate picture of how different sectors are operating in practice. This includes gaining insight into the extent to which ads are likely to comply with the rules, as well as identifying any areas of concern where the rules may not be being met.

This report presents the findings of an ambitious ASA trial using cutting-edge Large Language Models to assess online advertising for alcohol – along with related products and services – against the full suite of rules set out in the alcohol-specific Section 18 of the UK advertising code (CAP Code).

Using the ASA's in-house Active Ad Monitoring system, we captured and processed nearly 6,000 paid-for ads served to UK consumers in early 2025. These ads appeared across online social media, search, and display channels, and included those that directly promoted alcohol, promoted alcohol-free alternatives, or otherwise related to alcohol-associated products and venues. These ads were then evaluated using AI agents capable of interpreting and applying regulatory criteria, with any AI-identified, 'probable' non-compliant content flagged for expert human review.

The trial provided a valuable test case for how AI can contribute to complex regulatory work. While certain rules – particularly those requiring nuanced, contextual judgement or subjective interpretation – remain challenging for automation, the tool delivered very strong results on more definitive Code rules. Importantly, it identified potentially concerning ads that had not triggered public complaints, showing how this kind of approach can offer fresh insights into sector-wide advertising practices.

Indicative alcohol ad compliance rates

The Active Ad Monitoring system trial found of the ads assessed against Section 18 of the CAP Code:

1-3% were likely non-compliant

1% were ambiguous and required further investigation

96% were compliant with the alcohol rules

Overall compliance was very encouraging: 96% of ads were likely compliant with the CAP Code, with just 1-3% (101 in total) assessed as likely non-compliant, with the remainder being ambiguous requiring further investigation.

The trial marks a major step forward in the ASA's use of AI, showing how these cutting-edge technologies can support the ASA to gain wider insights into its work. By providing a fuller picture of likely compliance rates, we intend these studies to better inform debate about the effectiveness and the proportionality of the rules that restrict their advertising. In this case, the overwhelming majority of alcohol ads monitored likely comply with the rules that ensure such ads remain responsible, particularly with regard to protecting under 18s. For the minority of ads that potentially do not comply, the ASA's use of AI supports us to achieve earlier, broader, and more efficient regulatory intervention.

Background: the ASA's use of data science

In a relatively short space of time, the ASA has significantly evolved and enhanced its use of data science, marking a clear shift in how it carries out its regulation of online advertising in an increasingly complex digital environment. What began as a small-scale experiment has developed into a core part of the organisation's regulatory toolkit: the ASA now routinely uses machine learning and other AI tools to not only monitor entire sectors at scale, but to build a more rounded understanding of the online advertising landscape. This enables us to reflect the overall picture of compliance more accurately – whilst also proactively identifying and tackling the small minority of ads that may raise concerns.

One of the most important developments has been the launch of the Active Ad Monitoring system, an in-house developed AI tool that scans large volumes of digital advertising to detect likely breaches of the ad rules. In 2024 alone the Active Ad Monitoring system processed 28m ads, which has already enabled targeted regulatory action in areas such as cryptocurrency, cosmetic procedures, and environmental claims – often before any complaints have even been received. Data science techniques have also been applied to support the ASA's work on influencer marketing, including tools to detect unlabelled ads on social media, helping the ASA better understand compliance levels across platforms, and focus its intervention where it's most needed.

In parallel, automated approaches have been trialled to analyse complaint trends and extract insights from large datasets, helping the organisation spot emerging issues and respond more swiftly. Taken together, these developments reflect a much broader shift: not just in tools and techniques, but in regulatory mindset; data science is now a fundamental part of how the ASA regulates in a fast-moving, digitally driven advertising ecosystem.

Methodology

This trial set out to test whether recent advances in AI – in particular, Large Language Models (LLMs) – could be used, at scale, to assess online advertising for potential breaches of the CAP Code. While the ASA has previously used various AI and other data science techniques – with great effect – to identify specific issues within ads, this was the first time AI was deployed to evaluate a large volume of ads against an *entire section* of the CAP Code – in this case, Section 18, which covers alcohol advertising. The aim was to see whether AI could effectively flag a wide range of potential compliance issues, including those we might not have known to look for in advance. In doing so, we hoped to generate richer insights into how alcohol-related ads are working in practice – beyond the limitations of our standard complaints process, and test whether this approach could inform more timely and proportionate regulatory responses.

To do this, the ASA's Active Ad Monitoring system was used to collect a one-month sample of around 6,000 ads appearing in third-party paid-for space online that either directly promoted alcohol, alcohol alternatives, or featured alcohol-related content (such as hospitality venues or events) and were served to UK users across online search, display, and social media platforms in early 2025.

Each of these ads – including both their text and their imagery – was then assessed using a state-of-the-art Large Language Model (LLM). LLMs are advanced AI tools trained on enormous volumes of online text and images, allowing them to develop a deep understanding of language, meaning, and context. When given the right instructions, they

can be directed to apply specific criteria – such as those found in Advertising Code rules – to assess whether ads are more or less likely to comply with the Code.

A critical part of this approach is known as *prompting* – effectively, the process of instructing the AI in order to maximise its efficacy. In this trial, the prompts were designed to provide the model with rich, complex context, including:

- The relevant rules as set out in the alcohol-specific, Section 18 of the CAP Code;
- Illustrative examples drawn from previous ASA rulings on alcohol;
- Additional regulatory principles used by ASA experts when assessing similar ads.

With this information, the LLM was then tasked with analysing each ad and flagging those it categorised as more likely to be in breach of the rules, along with a rationale for why. This method offered two major advantages. Firstly, it allowed thousands of ads to be assessed, programmatically, in minutes, far beyond the capacity of a human team, providing insight into the broader compliance picture. Secondly, it offered the possibility of identifying the small minority of ads that were more likely at risk of breaching the Code, that may not yet have appeared in public complaints, allowing for earlier, intelligence-led intervention in those cases.

However, like all new tools, LLMs have limitations. While they can spot clear-cut rule breaches with impressive speed and consistency, they do not possess the same depth of judgement or contextual reasoning as human experts. As a result, the tool tended to flag many *potential* breaches – a significant proportion of which were ultimately judged not to be problematic upon closer (human) inspection.

To address this, all ads identified by the LLM as being at risk of not complying were passed on to ASA staff with expertise in alcohol advertising. These experts reviewed each case to determine whether the flagged content was likely to breach the Code.

To assess the model's performance, we also tested a sample of ads that were not flagged by the AI, to estimate how often it may be missing potentially problematic content.

Based on this and other review data, we estimate:

- Percentage of model flags that identified possible breaches of the Code (precision) = approximately 40%, meaning that around four in every ten ads flagged by the model presented possible breaches of the Code upon human review.
- Percentage of problem ads we caught (recall) = approximately 65%, meaning that of all the ads with possible issues, the model was able to flag about two-thirds.

These figures indicate that while the model is far from perfect, it significantly enhances our ability to identify, at scale, a subset of ads that may raise compliance issues. A precision rate of 40% means that our expert human reviewers are seeing value in nearly half of what the model flags, which is a worthwhile use of time and resource. What's more, the recall rate reveals that the model is surfacing a majority of ads with possible issues, that would be otherwise difficult to detect manually, especially across such large datasets.

Taken together, this process enabled the ASA to:

- Identify possible or probable non-compliant ads that could be interrogated further;
- Evaluate where the LLM performed well or fell short: these insights will help improve any future iterations of the tool.

This methodology demonstrates how AI can be used not to replace human judgement, but to extend its reach, by filtering and focusing attention on the ads that matter most, while preserving the quality and rigour of expert human assessment.

How the ASA used the Active Ad Monitoring system in this trial

1 We capture thousands of alcohol ads
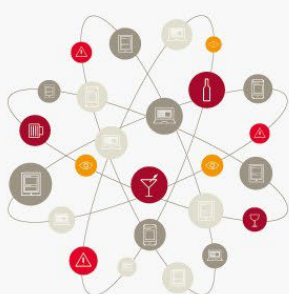
The ASA's Active Ad Monitoring system (AAMs) gathers thousands of alcohol ads from multiple digital platforms, giving a clear snapshot of what's out there.

2 The AAMs screens the ads

Using advanced AI tools, the AAMs checks each ad against the alcohol rules in the CAP Code, spotting language, imagery, and themes that might cross the line.

3 Around 600 ads are flagged

The AAMs narrows the focus, surfacing a subset of ads that look most likely to raise compliance issues.

4 Human experts review the flagged ads

Specialist reviewers step in, bringing expertise and judgment to each ad, testing the AI's instincts against real-world regulatory understanding.

5 Problematic ads are identified

Together, the process pinpoints ads that genuinely breach the rules, separating genuine issues from false positives.

6 Insights are fed back into the AAMs

Patterns in what's flagged – and what's confirmed as problematic – are fed back in, to shape and improve the AAMs' prompts.

Alcohol-specific findings

Interpreting the results: alcohol vs alcohol-free products

Before outlining our findings in full, it's important to note that we assessed ads for alcohol-free products separately from alcoholic products. Although these are often advertised side by side in practice, they are treated differently under the advertising rules. While both fall under Section 18 of the CAP Code, alcohol-free products (under 0.5%) are covered by a specific subsection (Rules 18.18 - 18.24), which focuses primarily on ABV declarations and the context in which they are advertised.

Use of graphic mock-ups

To help illustrate how the LLM flagged potentially non-compliant content, we've included a small number of recreated ad mock-ups, based on real examples identified during the trial. These have been anonymised and adapted to remove any direct references to identifiable advertisers, while retaining the key features or language that led the ads to be flagged. The purpose is to demonstrate how AI-assisted monitoring works in practice – not to publicly highlight specific companies. Where issues were identified, the relevant advertisers will be followed up with separately through our standard compliance processes.

Alcohol advertising (over 0.5% ABV)

The broader alcohol sector showed high levels of compliance. After human review and statistical analysis, the indicative breakdown was:

- **Very likely compliant:** 96% (+-1%)
- **Very likely non-compliant:** 2% (+-1%)
- **Borderline compliant:** 2% (+-1%)

This suggests that most alcohol advertisers follow the rules well, though there are a small number of ads that raise clear concerns, and a similarly sized group of much more borderline cases that would require further investigation to reach a final view.

Most common non-compliant themes

Among the approximately 2% of ads assessed as very likely non-compliant, the most frequent issues included:

- **Health or nutritional claims**
  Ads (from both large and small brands) making unauthorised claims around calorie content, sugar levels, or weight control – all of which are prohibited for alcoholic drinks.

- **Promotion of irresponsible drinking**
  This was the most common likely breach theme. It included ads, mainly for venues in which alcohol is served, that:
  - Linked alcohol to reckless or daring behaviour;
  - Promoted events featuring unlimited or high-volume alcohol;

- Implied that drinking to excess was enjoyable or expected;
- Promoted high-ABV products where strength was used as a key selling point.

All these issues were seen across both large national hospitality chains <u>and</u> smaller advertisers, including independent venues.

- **Particular appeal to children**

Ads from smaller alcohol brands and venues that used imagery or themes likely to appeal particularly to children, e.g. cartoon characters or sweets-themed alcoholic products.

<u>Mock-up ad 1 (illustrative example) – health or nutritional claims</u>

Large Language Model (LLM) explanation: "The phrase 'Gentle on the Waistline' implies a health benefit related to weight control, which amounts to an unauthorised health claim for alcoholic beverages". As a result, the LLM flagged this ad as potentially non-compliant; our human experts agreed.

<u>Mock-up ad 2 (illustrative example) – promotion of irresponsible drinking</u>

Large Language Model (LLM) explanation: "The promotional language - Get Pounded on Smirnoff - encourages heavy, potentially excessive drinking, and targeting students raises concerns about appealing to those under 18, despite an 18+ entry requirement". As a result, the LLM flagged this ad as potentially non-compliant; our human experts agreed.

Mock-up ad 3 (illustrative example) – particular appeal to children

Large Language Model (LLM) explanation: "The use of cartoon imagery could appeal to under-18s, and low-priced drinks may encourage excessive consumption, raising concerns about targeting a younger audience and irresponsibly promoting alcohol". The LLM flagged this ad as potentially non-compliant; our human experts agreed that this ad raised concerns that would likely require further investigation.

Borderline or "grey area" cases

In an additional approximate 2% of cases, the ads were not clearly in breach but raised concerns that would likely require further investigation. These cases often touched on highly subjective interpretations of the rules, including:

- **Alcohol as a key to lifestyle or happiness**
  Ads – often from smaller brands – that subtly suggested alcohol is essential to enjoying an event or achieving a certain lifestyle, without stating this directly. *(CAP Code (Edition 12) rules 18.2, 18.3 (Alcohol)).*
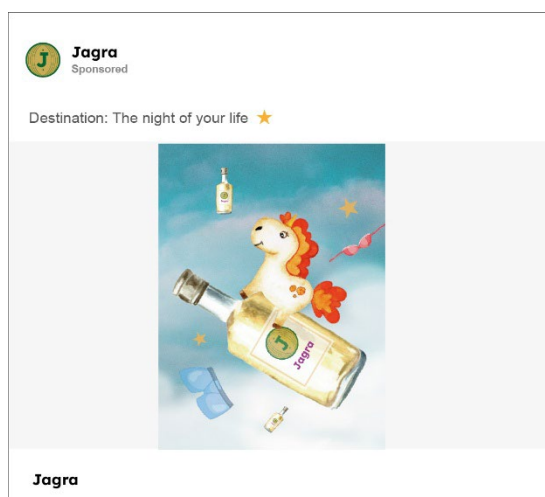
- **Alcohol and social or sexual success**
  Campaigns implying that alcohol leads to confidence, connection, or attractiveness. The language was often ambiguous enough to sit just within the rules but could be read differently in different contexts. *(CAP Code (Edition 12) rule 18.5 (Alcohol)).*

- **Borderline depictions of irresponsibility or child appeal**
  Ads where imagery, tone or references may be problematic depending on interpretation, but again, not clearly in breach. *(CAP Code (Edition 12) rules 18.10, 18.11, 18.14 (Alcohol)).*

Mock-up ad 4 (illustrative example) – borderline or "grey areas"

Large Language Model (LLM) explanation: "Phrase "The night of your life" implies alcohol is the key to an exceptional experience, suggesting social/sexual success. Flying underwear links alcohol with sexual activity or seduction. Bright, whimsical cartoon animal could strongly appeal to under-18s. These elements risk breaching CAP rules on linking alcohol to sexual success, implying enhanced social experiences, and appealing to minors". As a result, the LLM flagged this ad as
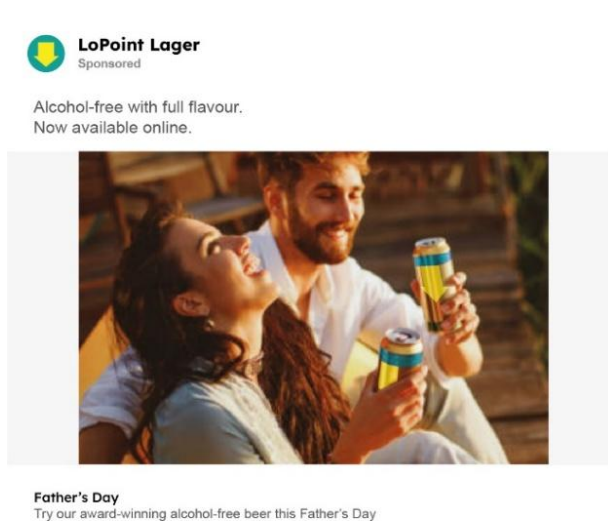
potentially non-compliant; our human experts agreed that this ad raised concerns that would likely require further investigation.

Alcohol-free alternatives (at or under 0.5% ABV)

By contrast, we observed a relatively high rate of potentially problematic advertising among alcohol-free products. Around 48% of alcohol-free ads we assessed had potential compliance issues – far higher than the alcohol category more broadly.

This was almost entirely due to missing or unclear ABV information. The Code requires marketing communications for alcohol alternatives to include a prominent statement of their ABV levels (Rule 18.19). This rule matters for consumers who regard 0.5% ABV or below as a level of alcohol they wish to avoid, including where there is a risk of physical or emotional harm. For these consumers, the ABV statement is part of their transactional decision to purchase or seek more information about a product, and it should therefore be clear and prominent in any ad.[1] A number of ads failed to meet this standard, including a noticeable proportion from smaller or newer advertisers. This may point to lower awareness of the ABV labelling requirement among SMEs in particular.

Mock-up ad 5 (illustrative example) – alcohol-free alternatives

LoPoint Lager
Sponsored

Alcohol-free with full flavour.
Now available online.

Father's Day
Try our award-winning alcohol-free beer this Father's Day

Large Language Model (LLM) explanation:
"The ad calls the product "alcohol free", but many beers described in this way typically contain up to 0.5% ABV, so the wording may be misleading. It also omits any clear, prominent statement of the ABV, breaching the transparency requirement. Otherwise, the imagery seems compliant, but the potential misdescription and lack of ABV make it potentially problematic." As a result, the LLM flagged this ad as potentially non-compliant; our human experts agreed.

Summary of key findings

Overall, and encouragingly, the alcohol sector appears to be overwhelmingly compliant with Section 18 of the CAP Code. There are some issues – across both large and small advertisers – but no evidence of widespread or systematic rule-breaking. In contrast, alcohol-free products present a more consistent issue, particularly around the failure to provide a prominent statement of their ABV levels. While these ads are governed by a

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[1] Regulatory Statement: New rules and guidance for alcohol alternative products - ASA | CAP

specific subset of rules under Section 18, the volume of unclear or missing information may indicate a need for further guidance to this sub-sector of ads to ensure clarity and consistency in this growing segment of the market.

Looking ahead: what we've learned, and what comes next

This inherently exploratory work reflects the ASA's commitment to strengthening and modernising how we regulate, and that commitment means continually testing, learning, and improving. This project, which involved an ambitious application of AI in our work, has shown not only what's possible now, but where we could go next.

One of the most significant takeaways is that Large Language Models (LLMs) can be used to effectively assess sector-specific ads at scale. The semi-automated approach taken allowed us to gain an excellent, and fairly immediate insight into broader compliance levels, which we're pleased to report are overwhelmingly positive, whilst also surfacing a number of potentially problematic ads, including some that would likely have been missed using traditional methods alone. It has demonstrated how this kind of technology can enhance our ability to spot potential issues – including in areas that may not attract complaints but could nonetheless have an impact on consumers or vulnerable groups.

This trial has also given us valuable technical insights, which will shape how we refine and apply this technique in future work – whether in the alcohol space or in other sectors. Specific improvements we are now exploring include:

- Integrating human feedback into LLM prompting, so that assessments more closely reflect expert interpretation of the CAP Code.
- Incorporating additional ASA guidance – such as AdviceOnline articles – into the LLM's context, helping it better understand how our rules are applied in practice.
- Improving the model's understanding of our enforcement priorities, such as weighting results based on likely harm, reach, or impact.
- Linking ads from the same campaign, so that we can review messaging in context and avoid duplication of effort.
- Experimenting with newer models and more advanced prompting methods, to improve accuracy and reduce false positives.

Taken together, these refinements will allow us to increase the precision and usefulness of AI in our regulatory work, helping us act earlier, and with greater confidence, on emerging risks.

Alcohol advertising-specific next steps

With regards to the alcohol-specific findings from this trial, we will take the following action:

- Firstly, the CAP Compliance team will prioritise direct follow-up with those advertisers responsible for clear-cut breaches of the alcohol rules identified during the trial. This approach will ensure timely action is taken where the Code has been broken, reinforcing the ASA's commitment to effective enforcement.

- Secondly, given the notably higher incidence of issues observed among low and no alcohol product advertising – particularly relating to unclear or missing ABV declarations – CAP will develop and issue an Insight Article aimed specifically at marketers in this

growing category. This will help clarify expectations and support consistent compliance, reflecting the distinct regulatory requirements that apply to these products.

These next steps will be complemented by ongoing stakeholder engagement and communications efforts to raise awareness of the key issues identified and share best practice across the sector.

Together, these measures aim to demonstrate clear, real-world impact from the trial's findings by reinforcing compliance, improving clarity around advertising low and no alcohol products, and ultimately helping to protect consumers from misleading or inappropriate advertising.

Concluding remarks

This work is part of a broader shift in how we regulate – one that puts people first, protects those most at risk, and embraces smart, tech-assisted methods that improve both accountability and efficiency.

As our use of AI grows and awareness of our role increases, we remain focused on what matters: protecting people, especially those in vulnerable circumstances, by ensuring that advertising is responsible. That's why we're continuing to invest in our Active Ad Monitoring system, making it an increasingly central part of how we regulate online advertising, now and into the future.

Recommended resources

Section 18 of the CAP Code: Alcohol

AdviceOnline: Alcohol; general

AdviceOnline: Featuring under-25s

AdviceOnline: Alcohol; promotional marketing

AdviceOnline: Alcohol alternatives and zero alcohol

AdviceOnline: ABV alcoholic strength

Advertising Guidance – Alcohol Alternatives

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