

The Drinkaware Trust response to the Committee of Advertising Practice and Broadcast Committee of Advertising Practice [consultation](#) on amending the rule limiting marketing claims for low alcohol products

15 April 2021

Question 1:

Do you agree with CAP and BCAP's proposed new rule to replace CAP rule 18.9 and BCAP rule 19.10? Please set out your arguments for supporting or disagreeing with the proposal.

The Drinkaware Trust is a registered charity with the mission to reduce alcohol harm and provide alcohol education.

Drinkaware's response is anchored in its remit of reducing alcohol harm by encouraging positive changes in drinking behaviours. Drinkaware aims to achieve this through public education concerning the facts and health implications of alcohol. The following response draws upon the charity's insight and evidence of attitudes to alcohol and of drinking behaviours, with the objective of considering how the change in CAP rule might more effectively contribute to protecting public health and reducing alcohol harm.

We therefore support the proposal in the regulations for advertising lower alcohol products, to allow for lower strength to be highlighted as a choice for the consumer as a substitution for higher strength alternatives. Drinkaware's desire is for lower strength drinks to be promoted as an alternative to higher strength drinks, in order to reduce harm from alcohol. There is some evidence that that lower strength products can be a potential moderation technique for higher-risk drinkers, if they are consumed as a substitution for a higher strength alternative, rather than in addition, but there is a need for robust academic research in this area. Drinkaware would encourage an independent pilot which monitors consumers' reaction and understanding of the adverts/messaging first, to understand the impact upon consumers and to address any unintended consequences. We would be happy to advise on this.

Our rationale is:

- Results from the Drinkaware Monitor¹ (our annual survey of the UK's attitudes to alcohol and drinking behaviours) suggest that willingness to try lower strength drinks as a moderation technique has increased over time. The Drinkaware Monitor Study 2020² indicates that one-third (34%) of UK drinkers report drinking or having drunk a lower strength alcoholic beverage as a means to moderate their alcohol consumption, a substantial increase from 2017 (25%). In addition, one-third of UK drinkers (33%) expressed an openness to trying lower strength drinks as a means to moderate their drinking—an increase from 2018 (30%).
- Lower strength products could be a potential moderation technique for higher-risk drinkers. According to the 2020 Drinkaware Monitor,^[2] higher-risk drinkers (defined using the AUDIT-C screening tool,^[3] scores 8-12) may be open to considering lower strength drinks as a way to moderate their drinking; with 11% of high-risk drinkers having tried this in the past, and 32% expressing a willingness to do so. A substantially lower proportion of higher-risk drinkers (37%) report never seeing themselves moderating

¹This is an annual survey with a nationally representative sample of around 9,000 participants <https://www.drinkaware.co.uk/research/drinkaware-monitors>

² Gunstone, B., Samra, S., & Newbold, P. (2020, October). *Monitor 2020*. YouGov and Drinkaware. <https://www.drinkaware.co.uk/research/drinkaware-monitors/drinkaware-monitor-2020-drinking-and-the-coronavirus-pandemic>

^[2] Ibid.

^[3] Gov.uk. (2020, October 17) *Alcohol use screening tests*. AUDIT-C. <https://www.gov.uk/government/publications/alcohol-use-screening-tests>

with a lower strength drink compared to those who can never see themselves moderating with an alcohol free drink (60%), suggesting lower strength drinks, rather than alcohol free ones, might possibly be an effective moderation technique. However, this needs further rigorous academic study.

- Drinkaware Monitor data from 2020 shows that increasing and higher risk drinkers³ are just as willing to consider lower strength drinks as a moderation technique as those who drink at lower risk levels (32% of higher risk drinkers, and 36% of increasing risk drinkers state they are not currently doing this but are willing to do so, compared to 31% of lower risk drinkers) (as defined using the AUDIT-C screening tool,^[3]).
- Conversely, data from the same survey also shows that drinkers who drink at increasing and higher risk levels are much less likely to say they have been 'doing this for a while'. With 12% of higher risk drinkers saying this, 14% of increasing risk drinkers and 25% of low-risk drinkers (as defined using AUDIT C^[3]).

Other considerations

- Research is required into potential unintended consequences, such as to understand whether lower strength drinks are perceived as additional drinks rather than substitutions for higher strength products by higher risk drinkers, as well as whether a lower strength product can prime a drinker to want a higher strength one.
- Additionally, further research is required on the impact of lower strength and alcohol-free drinks on children and young people. For example, does the proliferation of lower strength and alcohol-free drinks normalise drinking or act as a gateway to higher strength alcohol amongst children and young people? Currently, there is no published evidence, but we would advocate a strongly precautionary stance.
- We would recommend that the guidance offer greater clarity on what 'relatively high strength' means or, the definition of 'standard products' and on what constitutes a 'category'? For example, craft beers vs lager / bitter.
- There are a number of people who must not or should not drink alcohol for medical or other reasons. It is therefore essential that advertising is clear, so they are not inadvertently misled into consuming alcohol.

We would be happy to offer support to the CAP on further insight on how to monitor any unintended consequences of this change.

^[3] Gov.uk. (2020, October 17) *Alcohol use screening tests*. AUDIT-C. <https://www.gov.uk/government/publications/alcohol-use-screening-tests>

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