

## **NACM response to Committee of Advertising Practice and Broadcast Committee of Advertising Practice consultation on amending the rule limiting marketing claims for low-alcohol products**

### **Introduction**

The NACM Cider Makers Ltd (NACM) welcomes and supports the Committee of Advertising Practice ("CAP") and Broadcast Committee of Advertising Practice's ("BCAP") proposal to amend the rule limiting comparative marketing claims for low-alcohol products.

Removing these restrictions would be beneficial in order for low-alcohol products to be advertised alongside standard strength drinks and thereby provide consumers with greater choice.

### **The NACM**

Founded in the 1920's, the NACM has 15 members making cider in the UK covering 85% of the cider sold in the UK <https://cideruk.com/meet-our-members/>. Its reach is further extended by a close working relationship with the regional cider making associations which represent small and micro cider makers. NACM actively encourages its members, both direct and indirect, to sell and market their products in socially responsible ways. As such we actively support the work of Drinkaware, The Portman Group and the Alcohol Education Trust.

Members of the NACM are required to adhere and comply with The Portman Group codes on the [Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks](#) and the [Code of Practice on Alcohol Sponsorship](#).

### **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.**

NACM agrees with CAP and BCAP's proposed new rule to replace CAP rule 18.9 and BCAP rule 19.10. We are in full support of the Portman Group's arguments set out in its response to this question

The current rule wording is restrictive because it prevents producers from suggesting that a low alcohol product may be preferable to a higher strength product in the same advert.

Low and alcohol-free drinks are increasing their market presence over the last few years as the taste profile has improved. There is the potential for further market penetration. The rule change will facilitate this.

Whilst we welcome the rule amendment, we would also like to take this opportunity to ask for greater consistency between the CAP Code, BCAP Code and the Portman Group's Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks when advertising 'lower' strength products.

The revision will enable cider makers to present consumers with clear information without breaching the Code, on product labelling and at point-of-sale, to allow them to make informed drinking choices.

Allowing 'lower' strength comparisons in advertising would create consistency across alcohol marketing and advertising rules and would inform consumers of further options when looking to moderate their alcohol consumption.