

# Study on the exposure of minors to alcohol advertising on linear and non-linear audio-visual media services and other online services, including a content analysis

Executive Summary (EN)

## EXECUTIVE SUMMARY (EN)

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## Executive summary

The first report on the application of the Audiovisual Media Services Directive (AVMSD)<sup>1</sup> was published on 4 May 2012. This report indicated that, with regard to alcohol advertising, further investigations were necessary to assess, amongst other things, the exposure of minors to commercial communications for alcoholic beverages. Against this background, the purpose of this study was to answer three research questions:

1. How much alcohol advertising does an average minor<sup>2</sup> watching linear audio-visual media services (i.e. television broadcasting) in the European Union (EU) see?
2. How much alcohol advertising does an average minor see on non-linear audio-visual media services (i.e. on-demand audio-visual media services) and other online services in the EU?
3. For audio-visual media services (both linear and non-linear) and other online services, what type of alcohol advertising does an average minor see in the EU? Are minors specifically targeted by alcohol advertising? In how far is alcohol advertising appealing to minors and how? In particular, in how far do the provisions of the AVMSD and their application afford the required level of protection?

These research questions, and therefore the study, go beyond the AVMSD. For example, this study covered online services (*Research Question 2*) that are not currently covered by the Directive (e.g. websites and social media). In addition, the content analysis (*Research Question 3*) not only assessed whether advertisements are specifically aimed at minors, but also looked more broadly at what was actually shown in the advertisement and if this, from a broader perspective, could be considered appealing to minors.

To answer these questions, we used a combination of research methods. All research activities have been conducted in the period from January to December 2015.

### **Research Question 1: How much alcohol advertising does an average minor watching linear audio-visual media services in the EU see?**

The analysis for Research Question 1 was based on two datasets<sup>3</sup>:

1. The GfK/Dentsu Aegis dataset, which consists of data on general viewing patterns and alcohol advertising impacts<sup>4</sup> for nine Member States (MS) selected for in-depth analysis in this study (Austria, Czech Republic, Finland, Germany, Italy, the Netherlands, Romania, Spain, United Kingdom) in 2013; and
2. the WFA/Ebiquity dataset, provided by the World Federation of Advertisers (WFA) and audited by Ebiquity, which consists of data on global advertising impacts, both for the total market and for the subset of alcohol brands, for 23 MS in 2013.

For both datasets we analysed the global breakdown of the number of insertions of alcohol advertisements (i.e. the number of alcohol spots) and how often these were

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<sup>1</sup> Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. First Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the application of Directive 2010/13/EU "Audiovisual Media Service Directive" Audiovisual Media Services and Connected Devices: Past and Future Perspectives, /\* COM/2012/0203 final \*/.

<sup>2</sup> For the purpose of this study, a minor is defined as an individual below the age of 18.

<sup>3</sup> For more information on these datasets, please see Chapter 2 of this report.

<sup>4</sup> Impact is a measure of how often an insertion of an (alcohol) advertisement is viewed: it yields the absolute number of times a spot was seen over a given timeframe.

viewed (i.e. the number of alcohol impacts) in 2013. Although there were a few differences between the two datasets in terms of the definition of age groups, the findings are consistent. In addition, the findings indicate that the nine selected MS for this study are a representative sample.

Based on the data in the WFA/Ebiquity dataset, we found that the percentage of alcohol impacts of total market impacts was on average 1.8% for minors and 2.2% for adults.

Moreover, the analysis of both the WFA/Ebiquity dataset and the GfK/Dentsu Aegis dataset revealed that, on average, approximately 7.3% of the total number of alcohol impacts seen in the EU on linear audio-visual (AV) media services in 2013 were seen by minors. For the nine selected MS this ranges from 5.0% to 9.0%. In absolute numbers this means that, on average, a minor in the EU saw 200 alcohol impacts in 2013, while an adult saw over 450 in the same period. Similar results were seen for each MS.

The findings with regard to the breakdown by sector revealed that in the vast majority of MS the sector 'beer' had the highest share of both the number of spots and the number of impacts seen.

The analysis of the viewing data for the nine MS revealed that the viewing patterns of adults and minors differed. In order to analyse if this difference in viewing habits may partly explain the difference in the level of exposure to alcohol advertising between minors and adults, we weighted the absolute daily average alcohol impacts by the average daily viewing rates per age group. We found that after applying this weighting, the difference between the exposure of minors and the exposure of adults to alcohol advertising on linear AV media services was reduced. We also applied a weighting based on the average viewing rates per age group for a subset of channels, namely those channels that include alcohol advertising. The results showed that applying this weighting further reduced the difference in exposure between minors and adults. In several of the nine selected MS, this weighted value was even higher for minors than for adults. Hence, the difference in the level of exposure to alcohol advertising between minors and adults may be partly explained by the differences in their viewing habits, both in terms of how often they watch television, and which channels they watch.

As part of the in-depth analysis, we looked at several detailed breakdowns of the alcohol spots and their impacts. One of these analyses was focused on the type of channel on which a spot was aired. We found that in all MS, the majority of both alcohol spots and alcohol impacts were seen on commercial channels, but that the average impact per spot appeared to be higher on public channels. Moreover, the results indicated that while in most MS the majority of spots were aired on generalist (i.e., not topic-specific) channels or on 'Entertainment, Series, Movies' channels, the majority of impacts were seen on generalist channels only. This may be explained by the relatively high viewing rates for these channels.

When looking at differences in terms of the occurrence of alcohol impacts throughout the day, we found that for the adults, the peak day part was between 21:00 and 23:59 in all MS. With the exception of one MS, this was also the peak day part for alcohol impacts among the 15-17 year olds. For the 4-14 year olds, the peak occurred between 17:00 and 20:59 in four MS and between 21:00 and 23:50 in five MS. Comparing these results with the peak day parts in terms of viewing patterns, we saw that for all age groups in

each of the nine MS, the peak day part in terms of alcohol impacts was either the same as for viewing patterns or one day part later.

With regard to hourly timeslots, we found that in each selected MS the alcohol impacts for all age groups followed a rather similar pattern and peaked in the evening. In four of the nine selected MS, the peak hourly timeslot in terms of alcohol impacts was the same across age groups.

Finally, the results showed that there is substantial variation across MS in terms of the weekday with the highest number of alcohol impacts seen. Moreover, within MS, differences between age groups were observed, but in the majority of MS all age groups saw on average the most alcohol impacts on the same weekday.

## **Research Question 2: How much alcohol advertising does an average minor see on non-linear audio-visual media services and other online services in the EU?**

The exposure of minors to alcohol advertising on non-linear AV media services and other online services has been analysed from both the perspective of the advertisers and the perspective of the viewers.

### ***Perspective of the advertisers***

To include the perspective of the advertisers we conducted desk research and surveyed selected online services and industry members as well as trade organisations. We also collected online data captures for selected YouTube channels and websites. Initially, the plan was to include Facebook, Instagram and Twitter in the online data capture. We sought formal approval from these online services, but Facebook and Twitter informed us that they were unable to approve the creation of fake profiles as this breaches their terms and conditions.

The results indicated that from the perspective of the advertisers, the level of exposure of minors to alcohol advertising on non-linear AV media services and other online services is supposed to be limited, because of (1) the measures that online services have in place to help advertisers to advertise their products responsibly and in compliance with all applicable laws and regulations and thereby, to restrict, or even prevent the exposure of minors to alcohol advertising; (2) the choice of advertisers for online services that offer age-gating/age verification and/or for which there is availability of audience data demonstrating that at least 70% of the likely audience is above the Legal Purchasing Age; and (3) the numerous self-regulation initiatives that are in place at the company, sector, industry, and national level.

This view was partially confirmed by the results of the online data capture<sup>5</sup>: of the 1,319 screen captures for YouTube and the 950 screen captures for websites (each website capture containing visits to up to 5 URLs on that website), only four unique advertisements<sup>6</sup> for alcohol brands were found. Of these four, two were served in pre-rolls on YouTube and two on websites in the form of banners. One of the pre-rolls advertised a non-alcoholic drink and was only served on the profile of an adult. The other pre-roll was captured three times for a minor's profile and three times for an adult's profile (both male). The two banners were served on both minors' and adults'

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<sup>5</sup> The online data capture was conducted for a period of two months (May and June 2015).

<sup>6</sup> The analysis of the online data captures focused on advertisements in the forms of pre-rolls, mid-rolls and (rolling) banners. Product placement in the YouTube videos was not analysed.

profiles, where one was captured twice on profiles for both minors and adults and the other was captured once on a minor's profile and four times on an adult's profile.

### ***Perspective of the viewers***

To analyse the exposure from the perspective of viewers, we conducted a one-time survey amongst minors aged 4-17 in each of the nine selected MS (n=900 per MS). The results indicated that viewers perceived quite a substantial amount of exposure: although alcohol advertisements are the least recalled type of advertisement by minors aged 9-17<sup>7</sup> in the nine selected MS, 23.9% of these minors recalled having seen an alcohol advertisement online in the last month. The results also indicated that the recall, and thus the perceived awareness of alcohol advertising, increases both with age and online activity. The respondents aged 9-17 were additionally asked if they were able to describe an alcohol advertisement to which they were recently exposed and 23.6% of these minors answered 'yes'. In addition, on average, 80% of these respondents indicated that they recalled the brand of the advertisement. The results showed that both the memory for having seen alcohol advertising as well as active brand recall also increased with age and online activity. The finding that recall increases with age and the amount of exposures is consistent with literature on advertisement recall among minors in general.

### ***Combining the results from the two perspectives***

The results from the two perspectives diverge and this may be the result of different factors, including:

- Over-estimation of self-reported exposure because of methodological limitations of the survey: First, the survey relies on self-reporting measures of exposure by asking recall questions, which induces the risk of recall-bias. Hence, where minors indicated that they recall having seen (alcohol) advertisements, it does not necessarily mean that the (alcohol) advertisement was actually provided. Second, no strict definition of advertisement was provided in the survey and therefore the reported exposure to alcohol advertising is subject to interpretation of what is perceived as 'alcohol advertising' by minors. For example, minors may have indicated that they recalled seeing an advertisement, whereas in reality, they saw user-generated content rather than commercial communications produced by advertisers.
- Over-estimation of exposure based on online data capture: in real life, people may use ad block software and/or nanny-tags in their browsers, and as a result not see any (alcohol) advertisement during their online activity.
- Under-estimation of exposure based on online data capture because of several caveats in the methodology: For example, cookies were generated during two months of online activity, whereas minors will typically have a richer browser history than the profiles that were generated for the purpose of this study. In addition, the data capture had a limited focus and only generated activity on a computer, whereas minors typically use different devices to go online. Also, there was no spill-over between profiles, whereas in reality minors may share a device with adults.
- Limited scope of the online data capture: as this part of the methodology was limited to a selection of YouTube channels and websites, it was difficult to draw conclusions with regard to the exposure on other popular online services, including Facebook, Instagram and Twitter.

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<sup>7</sup> For ethical reasons, minors in the age group 4-8 were not asked questions on alcohol advertising, but rather on advertising in general and their online activity.

Because of the discrepancies in the results, it is difficult to draw overall conclusions with regard to the level of exposure of minors to alcohol advertising on non-linear AV media services and other online services. It can, however, be concluded that self-reported exposure to alcohol advertising increases with age and online activity and that both the online services and the industry aim to ensure minimal exposure through the implementation of measures and self-regulation.

**Research Question 3: For audio-visual media services (both linear and non-linear) and other online services, what type of alcohol advertising does an average minor see in the EU? Are minors specifically targeted by alcohol advertising? In how far is alcohol advertising appealing to minors and how? In particular, in how far do the provisions of the AVMSD and their application afford the required level of protection?**

The content analysis that has been conducted in order to answer Research Question 3 started with the development of an analysis grid, containing two types of assessment criteria: the first being elements directly derived from article 22 of the AVMSD, and the second being criteria, which have been developed on the basis of literature reviews, to assess whether advertisements, in a more general sense, can be considered to be appealing to minors. One of the difficulties in defining these criteria is that most of the elements of advertising have general appeal, that is, they are likely to stimulate reactions in wider audiences, not only in one target group. On the basis of previous research on minors' perceptions of alcohol advertising, it is possible to say that minors are likely to be appealed by, for instance, advertisements that utilise humour and music. However, these elements also attract adult viewers, and they are therefore widely used in advertising. This means that the content analysis, the grid and its subcategories are based on elements that - according to the existing research - are appealing to minors, but they are not necessarily specifically appealing to only minors. This being said, we included elements in the analysis grid that are relevant for minors in relation to alcohol.

After pilot testing and peer reviewing the analysis grid, we applied the grid to a sample of 123 alcohol advertisements, of which 90 aired on television (short film inserts and sponsorship messages shown in relation to television programmes) and 33 online (in the form of banners) in the nine selected MS in 2013.

It appeared that there is a wide variety of themes employed in the advertisements, the most typical ones being the association of alcohol with sociability and depicting drinking with humorous tone. The analysis revealed that 87% of the television advertisements and 63% of the online advertisements (banners) contained at least one element that can be considered to be appealing to minors. Despite the fact that the majority of the advertisements in the sample contained at least one element appealing to minors, this does not, as explained before, indicate that minors were specifically targeted.

Existing literature shows that for minors, the most important context of using alcohol is partying and celebration, but only 17% of the advertisements in the sample portrayed this context. Animal characters – most likely to attract minors – were shown in 4% of the advertisements.

Associations of social and sexual success, popularity, sociability and enjoyment with alcohol consumption are part of wider cultural representations of what drinking is about and these were also the most central themes in the advertisements. The advertisements

in the sample created a strong link between enjoyable social occasions, on the one hand, and alcohol, on the other, corresponding with general cultural representations of drinking with respect to adults and minors alike. Considering the role of sociability in the advertisements, and the high relevance of social relations and belonging to minors, it is plausible to say that alcohol advertising is likely to be appealing to under aged audiences.

In addition, we found that 25% of the full sample of advertisements (37% of the television advertisements and none of the online advertisements) reflect at least one of the criteria described in AVMSD, although this does not necessarily constitute an infringement in itself. The provisions in the Directive refer to causal links between the product and its effects, which are, for the most part, the kinds of simple storylines that are mostly avoided in advertisement contents. The advertisements rarely suggested positive outcomes caused by the products. Rather, they were focused on associations that are possible to create within a few seconds (for example by portraying drinking among young, trendy people) and without highlighting causality (being attractive and socially successful is caused by consuming the product).

The results of the content analysis are based on 123 linear and non-linear alcohol advertisements from nine EU MS. This is a small sample considering the total amount of advertisements appearing in all AV media services in the EU. In addition, the sample for non-linear and other online services was limited to online banners. As such, the results are not generalizable to all alcohol advertisements. However, the results are applicable for assessing the variety of themes and elements utilised by alcohol advertising and whether the marketing regulations and codes are clear enough to be followed.

### **Recommendations for further research**

In order to gain more insight into the exposure of minors to alcohol advertising and to overcome several of the identified caveats, we recommend further research to:

- include other forms of advertising in the scope of the study, such as product placement;
- analyse exposure over time through longitudinal studies. This could also be a way to analyse the effectiveness of newly introduced (self-) regulation;
- include viewing data for a larger sample of channels to allow for more detailed relative analyses, weighting average daily alcohol impacts by viewing ratings;
- search for other ways to monitor the exposure on online services; e.g. by recruiting minors in MS and asking for their permission to monitor their activity on online services;
- use focus groups or individual interviews rather than an online survey to study the perspective of viewers. This will help to overcome some of the limitations related to the method for measuring self-reported exposure. This is, however, a resource-demanding approach;
- include adults in the sample that is surveyed in order to facilitate a comparison between self-reported exposure by minors and adults;
- conduct a reception study involving minors in order to define the criteria for the content analysis in more detail. The analysis of minors' perceptions of ambiguous contents of advertisements would help to determine, for instance, what they see as representations of social and sexual success.

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