

PORTMAN GROUP RESPONSE TO DCMS CONSULTATION ON PRODUCT PLACEMENT ON TELEVISION

The Portman Group (TPG) is the social responsibility organisation for UK drinks producers¹. Our role is:

- Encouraging and challenging the industry to promote its products responsibly, mainly through the operation of the Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks;
- Demonstrating leadership on best practice on alcohol social responsibility through the actions of member companies;
- Speaking on behalf of members on these issues to inform public opinion and policy.

We are restricting this consultation response to those questions that relate specifically to the product placement of alcohol.

Q18 – Should there be restrictions on placing certain types of products (e.g. HFSS foods or alcohol) in programmes with a disproportionately high child audience?

If product placement of alcohol is allowed (see response to Q24, below), we consider that it should be permitted only in those programmes around which it is permissible to advertise alcohol (i.e. which are not of particular appeal to children and which meet the necessary requirement in respect of their audience age profile). The restrictions on the programmes with which alcohol advertising can be shown are there for a good reason and that it would be illogical to allow alcohol product placement to take place when such advertising restrictions apply.

Q19 - If so, should those restrictions be the same as or greater than those which are currently in place for the scheduling of spot advertising of those products?

See above.

Q24 - Should television placement of alcohol, HFSS foods or gambling be subject to an outright prohibition; or, if not prohibited, should it be subject to restrictions of some kind?

We recognise that this is a very difficult topic. We would normally argue that the drinks industry should be allowed responsibly to market its products primarily to an adult audience using the same marketing channels as other industries. But we acknowledge that product placement raises particular issues not associated with other forms of marketing. In particular, it does not necessarily allow a company the same degree of control over messaging as do other forms of marketing. This means that it might be impracticable to make product placement subject to detailed restrictions.

¹ *Current member companies are AB Inbev, Bacardi Brown-Forman Brands, Beverage Brands, Carlsberg, Diageo, Heineken UK, Molson Coors, Pernod Ricard*

If, however, there is insufficient control on alcohol product placement, it could lead to some less scrupulous companies abandoning other strictly-regulated media in favour of high-profile product placement through which they could convey brand associations (for example, with excessive or inappropriate consumption, sexual success, etc) that they could not convey through other forms of marketing.

We would be deeply concerned if alcohol product placement was allowed to undermine the careful safeguards applied to all other forms of alcohol marketing.

We therefore do not necessarily argue in favour of allowing the product placement of alcohol. We do argue strongly, however, that if product placement is allowed, it be subject to exactly the same strict standards that currently apply to television advertising through the BCAP Code (and which are mirrored in the Portman Group's Code applying to various other forms of marketing).

Q25 - If it is not practicable to apply the detail of the BCAP Code rules on alcohol advertising to alcohol product placement, would the simple AVMS Directive rules that alcohol advertising must not be aimed specifically at minors and must not encourage immoderate consumption provide adequate safeguards?

As is made clear above, if it is not practicable to apply the detail of the BCAP Code rules on alcohol advertising to alcohol product placement, there should be a prohibition on alcohol product placement. It would be insufficient to apply only the simple AVMS Directive rules. These rules would not prevent, for example, implications that drinking led to social/sexual success or the majority of the other implications and associations that are currently prohibited through the BCAP Code.

Q26 - Are there any alternative forms of safeguard that may be appropriate?

We can think of no other forms of safeguard that would be appropriate.

Q27 - What methods of assessment and monitoring would be most effective in ensuring that there was accurate and reliable information about the actual effects of any introduction of product placement in these areas?

Provided that alcohol product placement is not allowed unless it conforms exactly to the strict rules of the BCAP Code, it should raise no issues beyond those currently raised by the television advertising of alcohol.

Q28 - Would it be possible or desirable to levy a charge on product placements to enable monitoring and/or research to take place?

See response to Q27, above.

Other comments

As noted above, drinks marketing through television and other media is already subject to strict regulation. We have concerns, however, about the way that alcohol is sometimes portrayed on television by programme makers. While we are not in favour of censorship, we should like DCMS and OFCOM to explore whether the Broadcasting Code needs tightening to prevent the unhelpful normalising and glamourising of drunkenness by programme makers.

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