



**Ad Standards** Community Panel  
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**AdStandards.com.au**

Ad Standards Limited  
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## Case Report

<b>1. Case Number :</b>	<b>0006-21</b>
<b>2. Advertiser :</b>	<b>Carlton United Brewery</b>
<b>3. Product :</b>	<b>Alcohol</b>
<b>4. Type of Advertisement/Media :</b>	<b>Internet - Social - Twitter</b>
<b>5. Date of Determination</b>	<b>20-Jan-2021</b>
<b>6. DETERMINATION :</b>	<b>Dismissed</b>

### ISSUES RAISED

AANA Code of Ethics\2.6 Health and Safety

### DESCRIPTION OF ADVERTISEMENT

This Twitter advertisement for zero alcohol beer features a man swimming and operating a jack hammer while drinking beer.

### THE COMPLAINT

Comments which the complainant/s made regarding this advertisement included the following:

*The code applies to non alcoholic brand extensions. Showing an individual drinking then participating in high risk activities is careless and a breach of the code.*

### THE ADVERTISER'S RESPONSE

Comments which the advertiser made in response to the complainant/s regarding this advertisement include the following:

*Thank you for your recent correspondence regarding a complaint with reference number 0006-21 and for providing CUB with the opportunity to respond.*

*Description of Carlton Zero TV advertisement*



*The advertising complained of was created for the Carlton Zero product. Carlton Zero is a 0.0% alcohol beer. It is an important part of the CUB portfolio and is marketed for consumers looking to enjoy the taste of a classic Australian lager, without drinking alcohol.*

*The tone of the advertisement is light-hearted and displays a montage of scenes in which it would be inappropriate to consume alcohol. The protagonist is able to consume Carlton Zero instead which is clearly shown to be a non-alcoholic beverage.*

*The advertisement begins with an actor lamenting the limitations to the activities he is able to perform when consuming alcohol in his many beer commercials. The man looks at the Carlton Zero bottle in his hand, and the camera focuses on the content statement shown clearly in red print as 0.0% alcohol. The man then dreams of engaging in the series of activities which become increasingly fanciful as the advertisement progresses. The advertisement finishes with an end board reading: "Rewrite the Rules 0.0% alcohol".*

*Details of the CAD reference number and CAD rating*

*The advertisement received a CAD rating of W (General / care in placement) via a ClearAds approval and dated 23 November 2020. The 'care in placement' rating refers to the need to avoid bookings aimed primarily at minors. CUB, mindful of its obligations as an alcoholic beverage marketer and advertiser, gave instructions to book placements for an audience aged 18 – 54 years old. This had always been CUB's intention, as the advertisement is aimed at adults.*

*Ad Standards Complaint*

*The complaint sent under cover of your letter dated 7 January 2021 states: "Carlton Zero, a non-alcoholic brand extension of Carlton United is advertised as a way to drink beer while swimming backstroke, operating heavy machinery and drag racing".*

*CUB and its parent entity Asahi Beverages are committed to ensuring our promotional and marketing material does not promote or encourage any irresponsible consumption of alcohol. Our goal is for consumers to enjoy our products responsibly and in moderation, and to uphold community standards in all our advertising.*

*The complaint made against the Carlton Zero TVC suggests it breaches section 2.6 of the Ad Standards Code of Ethics, which requires that "Advertising shall not depict material contrary to Prevailing Community Standards on health and safety". The Ad Standards Practice Note gives the following guidance on Unsafe Practices:*

*"Images of bike riding without helmets or not wearing a seatbelt will be contrary to prevailing community standards relating to health and safety. Similarly, advertisements depicting unsafe practices or images, such as riding down a hill in a wheelie bin, using a mobile phone while driving or apparently hiding in a chest freezer*



*etc are unacceptable. Advertisers should take care not to depict behaviour that children may imitate”.*

*The Carlton Zero product is non-alcoholic and this is clearly shown on screen at the beginning and end of the advertisement. The voiceovers reinforce the 0.0% alcohol content of the beverage. Whenever the protagonist consumes the beverage, the distinctive black label of the Carlton Zero bottle is clearly visible. The point of the advertisement is stated by the Carlton Zero drinker at the outset: that Carlton Zero has 0.0% alcohol (unlike beer) and so is safe to be consumed even when engaging in the activities the drinker dreams of which require a high degree of physical coordination.*

*CUB is mindful of its obligations regarding this brand extension, which is why the alcohol content is clearly called out and the Carlton Zero product is distinguished from beer in this way. CUB made a special label for the Carlton Zero bottle used in the TVC so that the 0.0% alcohol content was clearly emphasised. There is absolutely no suggestion made in the advertisement nor implied by the advertisement that any other Carlton product can be consumed in these circumstances. The beverage consumed contains no alcohol and therefore all the imagined activities can be safely engaged in while consuming the beverage, no matter how fanciful those activities may be. The point is to highlight the beverage as a non-alcoholic alternative to beer.*

*Lastly, while the video portrays fanciful and light-hearted scenarios, great care has been taken to ensure no dangerous behaviour is shown on screen. In their approval, ClearAds included the annotation: “while a ClearAds number has been issued for this TVC, it may attract complaint under the AANA Code of Ethics 2.6 (Health and Safety – worksite without fully appropriate workwear (no pants))”. CUB, mindful of its Code of Ethics obligations, had already made exhaustive attempts before commencing filming to establish exactly what clothing is mandated for safe operation of this type of heavy machinery.*

*There is no standard set for the clothing required to be worn and so the filming went ahead using the safety wear recommended for this operation (hard hat, ear protection, safety glasses, safety vest, and work boots) as shown. The restrictions to operating jackhammers on building sites make the possibilities of imitation extremely unlikely in compliance with the Ad Standards Practice Note. It was felt that the minimal clothing worn underneath the safety vest reinforced the fanciful and imagined nature of the activity within the narrative of the TVC as the protagonist has just come from swimming in the ocean.*

*CUB created Carlton Zero to give consumers of beer a non-alcoholic beverage with the Carlton beer flavour increasing their options for responsible and moderate consumption. The advertisement aims to highlight this to consumers by presenting one of the advantages of Carlton Zero consumption in a comical way. The advertisement has been aimed at adults in a light-hearted manner but with a conscious commitment to adhering to CUB’s obligations as a responsible advertiser.*



*Thank you for considering this response. If you have any further questions, please do not hesitate to contact me on [rachel.peterson@cub.com.au](mailto:rachel.peterson@cub.com.au).*

## **THE DETERMINATION**

The Ad Standards Community Panel (Panel) considered whether the advertisement breaches Section 2 of the AANA Code of Ethics (the Code).

The Panel noted the complainant's concern that showing an individual drinking and then participating in high-risk activities is careless and is a breach of the Alcohol Code.

The Panel viewed the advertisement and noted the advertiser's response.

### **Section 2.6: Advertising or Marketing Communications shall not depict material contrary to Prevailing Community Standards on health and safety.**

The Panel noted that the complainant was specifically referring to the ABAC Code in their complaint (see end of Determination for information) when referring to the Code applying to non-alcoholic brand extensions.

The Panel noted that the man is shown to be holding a glass bottle in each scene. The Panel noted that the advertisement makes it clear that the product depicted is a non-alcoholic product, and considered that most members of the community would not take the message that consuming alcohol before or during such activities is encouraged.

The Panel considered that the advertisement is highly stylized and fantastical, based on the actor moving very quickly through the water when swimming, jackhammering while wearing only underpants and a high-vis vest, and getting into a race car.

The Panel considered that most members of the community would not find such clearly exaggerated scenarios to be promoting or encouraging dangerous behaviour.

### **Section 2.6 conclusion**

The Panel considered that the advertisement did not contain material contrary to Prevailing Community Standards on health and safety and determined that it did not breach Section 2.6 of the Code.

## **Conclusion**

Finding that the advertisement did not breach the Code on other grounds, the Panel dismissed the complaint.

## **ABAC Code**



The Panel noted that advertisements about alcohol products may be considered against the provisions of the AANA Advertiser Code of Ethics as well as the Alcohol Beverages Advertising Code Scheme (ABAC). The Panel noted that complaint/s in this case were referred to ABAC for assessment. The Panel noted that the ABAC Responsible Alcohol Marketing Code (ABAC Code) is an alcohol specific code of good marketing practice and has specific standards which apply to the promotion of alcohol products. The Panel further noted that it can only consider complaints about alcohol advertising under the concept of prevailing community standards as set out by the AANA Code of Ethics. The Panel noted that the advertisement may be considered by the ABAC Chief Adjudicator or the ABAC Adjudication Panel applying the ABAC Code, as well as this determination under the Code of Ethics.