



Case Report

1	Case Number	0046/15
2	Advertiser	Drink Wise Australia
3	Product	Alcohol
4	Type of Advertisement / media	Billboard
5	Date of Determination	25/02/2015
6	DETERMINATION	Dismissed

ISSUES RAISED

2.6 - Health and Safety Within prevailing Community Standards

DESCRIPTION OF THE ADVERTISEMENT

Illustrated character holding a beer bottle with copy stating 'DIGNITY - Learn how to keep it'. Web, Facebook and Instagram addresses listed at bottom of advertisement.

THE COMPLAINT

A sample of comments which the complainant/s made regarding this advertisement included the following:

Please examine this campaign because it must surely breach advertising standards. I work with young people who have no idea how much is too much and who regularly binge drink. We owe our young people better than this manipulative deceptive campaign. And those that created this campaign should be ashamed.

As a citizen, I require a response from you as to what action you are taking.

Or not- why do I feel so cynical? There will be some clever loop hole of course. Making loads of money out of exploiting vulnerable youth is the priority but I know from experience that even the children of advertising companies and the shareholders of alcohol sellers are hurting themselves and their families with problem drinking. Maybe you are even experiencing it in your own family.

Please act on this deceptive campaign. The specific amount of standard drinks for safe drinking must be given upfront.

I hope you are able to use your responsible position to be part of the solution.

THE ADVERTISER'S RESPONSE

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

Thank you for providing us with a copy of a complaint received by the Advertising Standards Bureau ("ASB") regarding a DrinkWise advertisement. We have considered the complaint in detail and provide our response as follows.

We contend that the advertisement referenced in the complaint 0046/15 does not breach any section (including Section 2) of the AANA Advertiser Code of Ethics (referred to in this letter as the "Code of Ethics") which also covers the AANA Code for Advertising and Marketing Communications to Children and the AANA Code for Food and Beverages Marketing. Both of the latter Codes are not applicable in this context as the advertisement is not directed at children and does not advertise a food or beverage product.

DrinkWise Australia is an independent, evidence-based not-for-profit organisation. Our primary focus is to help bring about a healthier and safer drinking culture in Australia. To promote such significant behavioural changes, we develop and implement a range of national information and education campaigns. We also provide practical resources to help inform and support the community about alcohol use.

The advertisement in question was developed as part of a broader social marketing campaign (the "Campaign") undertaken in response to substantial research into the social trends and drinking habits of young adults aged 18-24 (the "Target Audience") which showed that the Target Audience continues to regularly consume alcohol in excess of the National Health and Medical Research Council (NHMRC) guidelines. As a result, DrinkWise recognised the need for a new approach in the delivery of its message to the Target Audience. By using dry humour and social media tools, DrinkWise encouraged the Target Audience to consider the personal and social consequences of poor drinking choices.

Accordingly, we disagree that the advertisement breaches Section 2 of the Code of Ethics. While addressing all elements of the Code under Section 2, the focus of this response will largely address 2.6 of the Code which appears to be the closest reasoning for the complaint (based on the language of the complainant).

2.1 Advertising or Marketing Communications shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.

This section does not appear relevant to the complaint. The advertisement does not discriminate or vilify. The main character used in the advertisement consistently illustrates the benefits of moderation, provides tips and advice to keep drinking in control and clearly emphasises that binge drinking is juvenile. The language used in the advertisement is designed to cut through to the Target Audience.

2.2 Advertising or marketing communications should not employ sexual appeal in a manner which is exploitative and degrading of any individual or group of people.

The advertisement does not employ sexual appeal. The characters used in the Campaign are animated and not realised in a sexually suggestive manner.

2.3 Advertising or Marketing Communications shall not present or portray violence unless it is justifiable in the context of the product or service advertised.

The advertisement does not present or portray violence and the Campaign only references violence as an unwelcome by-product of excessive drinking.

2.4 Advertising or Marketing Communications shall treat sex, sexuality and nudity with sensitivity to the relevant audience.

The advertisement does not portray sex, sexuality or nudity.

2.5 Advertising or Marketing Communications shall only use language which is appropriate in the circumstances (including appropriate for the relevant audience and medium). Strong or obscene language shall be avoided.

The advertisement features appropriate language for the Target Audience. The website, which is referenced in the complaint, states that the content is for those over 18 years and the language is again appropriate for the Target Audience and designed to cut through to the Target Audience.

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

The advertisement and Campaign in question is at heart a health and safety campaign that intends to convey to the Target Audience that binge drinking is socially unacceptable and undesirable.

DrinkWise commissioned extensive quantitative and qualitative formative research as well as multiple rounds of concept testing research to ensure the campaign cut through with young adults. Part of this evidence-based approach involved nationwide research conducted with the Target Audience, which indicated high levels of excessive drinking (at private premises before going out to public venues) and binge drinking behaviour.

We note that the complainant has claimed that the advertisement “promotes” alcohol usage. The message that is conveyed in the advertisement is the opposite.

The complaint alleges “Mysteriously, you are supposed to know when you have reached a

tipping point and are becoming obnoxious” and indicates that the accompanying website does not mention the safe level of drinking in reference to standard drinks. DrinkWise contends that the approach taken via this social marketing campaign is aimed at illustrating poor drinking behaviours amongst 18-24 year olds. Our commissioned research identified that this Target Audience does not drink to Government issued ‘standard drink’ levels but according to acceptable personal levels and peer expectations. This research indicated that on a ‘normal’ night out, 29% of the Target audience reported consuming 7+ standard drinks – and on a self-defined ‘big night out’, nearly 30% of consumed 11+ standard drinks – significantly above the NHMRC guidelines.

By illustrating positive behaviours associated with moderation and the negative behaviours associated with poor drinking choices, the Campaign aims to provide the Target Audience with more credible strategies and actionable cues (to look out for) when drinking that the Target Audience can relate to.

The advertisement message ‘Dignity – learn how to keep it’ is a clear reference to maintaining respectability and control while consuming alcohol.

This message is also referred to on the DrinkWise website (www.drinkwise.org.au), which is linked to the Campaign website and provides a variety of information sources on the effects of alcohol, the benefits of drinking in moderation and user friendly tools such as a standard drink calculator.

The DrinkWise website does contain references and information on Australia’s Alcohol Guidelines (<https://www.drinkwise.org.au/drinking-and-you/tips-to-help-you-drink-properly/#>) and also references the many factors that affect the impact of alcohol on an individual (such as body mass index, tiredness or lack of food). However, the main focus of the Campaign is the behaviours of the Target Audience, for whom the key influencers are peers rather than measures perceived as “imposed” by distant adults.

While the advertisement is delivered with a humorous tone and using concepts and language designed to engage the Target Audience, it clearly carries a serious message about staying in control and drinking safely and responsibly. It encourages the Target Audience to stop, reflect and consider how their poor drinking choices can impact how they see themselves, both personally and in the context of their peer group. This is consistent with research showing that the Target Audience is inclined to dismiss communication seen as directive in nature, and coming from authority figures such as parents and law enforcement agencies. The form and content of the advertisements are designed resonate with the Target Audience, to promote peer discussion and ideally lead them to seek further information.

The response from the Target Audience in both behaviour (watching, sharing, likings and commenting) as well as understanding (what they are saying) through the first and current phases of the campaign are consistent with the intended outcome. This is demonstrated by both the results and the verbatim included as part of this document.

In summary, while DrinkWise take all complaints seriously, we note that since the launch of the Campaign in February 2014, there has been a significant amount of positive feedback from the Target Audience, Governments and the industry towards these important moderation messages. To date, the Campaign has sparked conversations and raised further awareness about the issues relating to the often poor drinking habits of young adults.

DrinkWise is committed to complying with the Code of Ethics and all relevant advertising laws and Codes at all times and on the basis of the above, we maintain that the advertisement does not contravene the Code of Ethics. On this basis, we respectfully submit that the complaint should be dismissed.

Research substantiation

As DrinkWise Australia is an evidence-based organisation the campaign messaging needed to be grounded in sound strategic insights based on what young people will respond to and engage with. Subsequently, the idea and refined communication targeted the emotional levers that had the best chance of effecting real change. This need required an exhaustive testing process from both a Quantitative and Qualitative perspective. The process began with an extensive quantitative segmentation process, completed by QMR (Quantum Market Research). Then GalKal was engaged to complete a three stage qualitative, strategic, concept and final validation testing process to ensure message uptake was as intended.

Audience belief that this campaign would incite heavy drinking or send the wrong message was dispelled with the majority of research respondents clearly comprehending the messages around moderation and measured drinking behaviours:

- *“It doesn’t promote drinking, it just doesn’t demonise it which is a good thing” – Male, 22*

Sydney

- *“It’s a more realistic approach than saying ‘don’t to this, don’t do that’” – Female, 19*
Sydney

- *“That’s gonna make people step back and think ‘oh ok, maybe I should watch out’.” –*
Female,

18 Sydney

At the crux of the Campaign, the majority of respondents saw a message that allowed them to position control and moderation into something that was aspirational and desirable. For this audience, it begins to shift the way they think about drinking and urges them to re-think their approach. It is no secret that many individuals within this target audience drink to get drunk, the Campaign seeks to address this mentality, by highlighting bad behaviour, empowering peers to call out their mates and reinforcing the negative social repercussions of drinking to excess i.e. getting drunk.

The key take out for the majority of the research sample was ‘drink smart not hard’ or ‘do it, just do it properly, within your limits’ which was met with positivity and seen as a realistic, refreshing and mature approach to drinking behaviours.

- *“The message is to drink controlled, don’t drink to get wasted or munted” – 19, Female,*
Sydney
- *“The way I saw it was that he [the character] was a safe drinker. He would have a couple but know his limits and know when to stop.” - 19, Female Sydney*

- *“It’s changing our ideas about going out and drinking” - 22 Female, Melbourne*
- *“Moderation is how much more consciously aware you are. You don’t want to be that messy and that is reflected, and everyone can see that” - Female, 18, Melbourne*

Core to the success of the Campaign (attitudinal and behavioural change) is highlighting the detrimental social and personal effect of being seen as the ‘amateur’ – and hero-ing the benefits of being seen as someone who can stay in control and embody mature behaviours. Across the sample, the majority of respondents understood that within this context ‘experienced’ alluded to someone who had drinking ‘smarts’ and could ‘keep their cool’ while drinking.

- *“To me it reminds me of the wise old uncle that’s done it all before and he’s trying to help you along and not get that bad reputation... I’d listen to him.” – 18, Female Regional NSW*
- *“An amateur is someone who can’t handle their drinks... the opposite of a classy drinker” - 18,*

Female, Sydney

- *“If you’re a proper drinker you know when to stop. If you’re smart about it you know your limit”*

– 18, Female, Sydney

Campaign Results:

The Campaign in market has elicited an extremely positive response, with very high levels of comprehension. With Phase 2 of the Campaign still in market, some of the more complicated analysis is not yet available. As a result we have used a combination of Phase 1 & 2 results where available (February 26th 2014 to February 10th 2015). Otherwise we have used Phase 1 results, as specified below (February 2014 – April 2014).

Campaign Uptake (Phase 1 and 2):

Unique Facebook Impressions: 2.32 million

Total Video Views: 3.70 million

Total Impressions: 79.18 million

Campaign tracking results (Phase 1):

Message take out:

‘it makes moderation look like a cool, classy thing to do’ (31%)

‘be classy, sophisticated when drinking’ (40%)

'it's okay to take control of my own drinking' (40%)

For a target that don't want to be told what to do, those who saw the campaign were starting to self-reflect:

- 81% were thinking about the benefits of moderating.*
- 77% were more aware of how others saw them when out drinking.*
- 71% were reflecting on the way they currently drink.*
- 33% claimed that they were drinking less as a result of seeing the campaign.*

Campaign Sharability (Phase 1):

Viral Impressions: 3.95 million

Overall Sentiment: 85% Positive, 3% Negative, 12% Neutral

Viral Impressions: 3,701,230

Paid Impressions: 4,069,223

Of the 7.77 million impressions content has appeared in a social Newsfeed, 48% of the time it has come as recommendation from a friend (Viral Impressions).

Campaign Sentiment (Phase 1):

Of Impressions Created on Social Media:

Positive: 3,069,063

Neutral: 495,965

Negative: 67,252

**When someone shares or says something about this campaign, it is classed as positive (praises and understands the message), neutral (no opinion given) or negative (speaks against the campaign).*

Campaign Comprehension:

The following screenshots were taken from comments made by Facebook and Twitter users on the Facebook Post containing the 'How to Drink Properly' 60 second web film.

THE DETERMINATION

The Advertising Standards Board (“Board”) considered whether this advertisement breaches Section 2 of the Advertiser Code of Ethics (the “Code”).

The Board noted the complainant’s concern that the advertisement encourages drinking alcohol which is contrary to prevailing community standards on health and safety.

The Board viewed the advertisement and noted the advertiser’s response.

The Board considered Section 2.6 of the Code. Section 2.6 of the Code states: “Advertising or Marketing Communications shall not depict material contrary to Prevailing Community Standards on health and safety”.

The Board noted the advertisement features an illustrated figure of a man holding a drink and the text reads, “Dignity – learn to keep it.”

The Board noted the text and considered that dignity is suggestive of being in control of yourself and the most likely interpretation of the advertisement is that you should not drink alcohol to excess.

The Board noted the complainant’s concerns regarding the website referenced in the advertisement. The Board noted it had previously dismissed a complaint about an internet advertisement for the same advertiser in case 0071/14 where:

“The Board noted that the beginning of the advertisement refers to the fact that to drink properly there is a way to do it and a way not to do it. The advertisement then shows various scenes that depict characters drinking as the voiceover highlights when they have had enough to drink and the consequence of them drinking beyond that point.

Some members of the Board were concerned that the advertisement did not clarify what the meaning of “drinking properly” means and that some viewers may find the message being delivered too subtle to understand. The Board agreed however, that the intention of the advertisement was to encourage drinkers to be aware of their own limits and to be familiar with the consequences of drinking excessively...

... the Board considered that the current advertisement depicted scenes that young adults would relate to and that the light-hearted approach did not undermine the importance of the message but rather provided age appropriate messaging to draw the attention of the intended audience.

The Board considered that the advertisement does not depict or encourage the excess consumption of alcohol and does not depict any material contrary to Prevailing Community

Standards on the safe consumption of alcohol. “

The Board acknowledged that there are significant community concerns regarding the anti-social and violent effects of alcohol but considered that in the context of a product which is legally allowed to be consumed a suggestion that you should drink properly is a positive encouragement to be aware of the effects of alcohol.

The Board considered that the advertisement itself does not encourage the consumption of alcohol and that whilst the associated website may not state the recommended alcohol limits the name of the advertiser, DrinkWise, and the advertisement and associated website are all encouraging the consumption of alcohol in a socially responsible manner.

The Board considered that the advertisement did not depict material contrary to prevailing community standards on health and safety.

The Board determined that the advertisement did not breach Section 2.6 of the Code.

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