# Breaching the code: Alcohol, Facebook and self-regulation

## Researchers

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## Summary

This report builds on our study of the activity of the top twenty alcohol brands on Facebook in Australia during 2012 (Carah, 2014) and a complaint made to the Advertising Standards Board (ASB) and Alcohol Beverages Advertising Code (ABAC) Complaints Panel regarding the pages of Victoria Bitter (VB) and Smirnoff in 2012 (Brodmerkel and Carah 2013).

In a 2012 submission we asked the ASB and ABAC to consider whether content posted on the Facebook pages of VB and Smirnoff breached standards in the code relating to excessive consumption, depiction of people under 25, offensive content, and the suggestion that alcohol improved mood and social success.

In a landmark decision, the ASB and ABAC both upheld the complaint, ruling for the first time that their alcohol advertising codes should apply to a brand’s Facebook page and that advertisers were directly responsible for the content that users generated on that platform, including comments made on a Facebook post.

Furthermore, the ASB and ABAC determined that user-generated content needed to be evaluated in the context in which it appears, taking account of how brands stimulate particular conversations.

This report examines content posted by alcohol brands to Facebook during 2012 following the determination of the ASB and ABAC (see Carah 2014) in order to assess compliance. The report poses three key research questions:  
• Are the breaches of the code seen in the 2012 ruling against VB and Smirnoff more widely evident on the Australian Facebook pages of alcohol brands?  
• Are alcohol brands complying with their own self-regulatory codes in light of the decisions by the ASB and ABAC in 2012?  
• And are the current regulatory codes appropriate for regulating alcohol brand activity on Facebook?

## Outcomes

Four people coded 40 items of alcohol brand content posted to Facebook during 2012. We selected and systematically adjudicated 40 items of content that popular Australian alcohol brands posted to Facebook in 2012 using the ABAC and Australian Association of National Advertisers (AANA) codes.

Across the 40 items of content examined, a total of 76 regulatory breaches were discerned by at least two coders. We found that the Facebook pages of Australian alcohol brands included:  
• content which encouraged, normalised and even celebrated excessive alcohol consumption  
• highly inappropriate, crude and offensive language  
• derogatory and vilifying comments  
• sexist and degrading sentiments, often with violent or menacing undertones  
• content implying that alcohol consumption causes a significant change in mood or environment, and social or sexual prowess  
• images of consumers who are clearly under the minimum age of 25 which is recommended by alcohol advertising codes in Australia.

We also examined items of brand content that raise issues not currently covered by the ABAC and AANA codes, including consumer participation and the volume, targeting and timing of branded content.

The report also analyses all items of content posted by alcohol brands to their Facebook pages on a Friday, in order to highlight the increased likelihood that time and event specific posts would raise a regulatory issue. We found that almost one in five Friday posts (17.8%) appeared to breach the ABAC and AANA codes. The vast majority of these breaches (83%) referred to excessive alcohol consumption.

## Recommendations

This analysis illustrated that brands are clearly not complying with their current self-regulatory advertising codes, with many of its provisions being regularly breached. These breaches are from both the brands themselves and the responses elicited from their Facebook fans.

Furthermore, despite releasing a revised ABAC Responsible Alcohol Marketing Code in 2014 following the 2012 ruling, the current alcohol advertising codes still do not adequately define, monitor or manage alcohol brand practices on Facebook. In some significant respects the revised code is even more ill-equipped to deal with contemporary alcohol brand advertising practices than its predecessor. The revision appears to further liberalise the capacity of brands to engage with consumers online.

In this report we raise four brand practices that are not adequately regulated or defined by the current alcohol advertising codes:  
• brands prompt consumers to promote excessive consumption  
• consumers extend the brand identity  
• activations and real-world promotions  
• volume, timing and targeting.

We also offer seven recommendations for consideration by researchers, policy-makers and the self-regulatory bodies in the future. These are:  
• Conceptualise branding as collaborative, participatory and interactive.  
• Assess the difficulty in applying codes based on judging the meaning of a text in an interactive media environment.  
• Pro-actively monitor and assess the extensive and routine breaching of regulatory codes on Facebook.  
• Recognise responsible and excessive consumption is not just about what brands say, but about the consumer contributions brands routinely invite.  
• Consider what aspects of people’s identities and lives it is appropriate for alcohol brands to engage with.  
• Specify sponsorships, activations and real-world promotions as intrinsic to the production of brands.  
• Address the volume, timing and targeting of content

[view the report](/wp-content/uploads/Breaching-the-code-Alcohol-Facebook-and-self-regulation.pdf)