



Best Practice for the Responsible Marketing of Alcohol Beverages in Digital Marketing

Introduction

The Alcohol Beverages Advertising (and Packaging) Code (the Code) sets high standards for the content of alcohol marketing including the content of alcohol advertising in digital marketing including social media. Alcohol advertising in digital marketing has been the subject of a number of ABAC adjudication decisions.

Digital Marketing means advertising through digital platforms including social media, applications, Blogs, Brand Websites, Instant Messaging, Livecasting, Microblogs, Mobile Communications and Messaging, Online/banner advertising, Online gaming, Photo sharing, Pinterest, Podcasts, Proximity marketing, QR Codes, Relationship marketing, RSS Feeds, Search engine marketing and optimisation, social networking, social news sites, user generated content, video sharing, and Wikis.

Standards for the placement of alcohol advertising are covered by complementary media specific Industry Codes of Practice. However, there is no specific code of practice for the placement of alcohol advertising in digital marketing.

In response, ABAC has developed this best practice advice to assist the alcohol industry in maintaining high standards of social responsibility in the management of alcohol advertising in digital marketing ,

This advice is non-binding and is not intended to replace or extend the provisions of the Code. Rather, it is intended as guidance to assist advertisers and agencies.

It is recognised that digital marketing is evolving rapidly and therefore the best practice advice will be reviewed on a regular basis and updated where necessary.

Interaction with other Regulation

1. All digital marketing communications must comply with the Alcohol Beverages Advertising (& Packaging) Code and the Australian Association of National Advertisers Code of Ethics.
2. All digital marketing communications must comply with guidelines for digital marketing published by the Australian Association of National Advertisers and the Communications Council.
3. All digital marketing communications must respect user privacy and laws governing the collection of personal information.
4. All digital marketing communications must comply with all other relevant laws in Australia.

Responsible drinking message

5. All websites and social media forums controlled by alcohol beverage advertisers should include a responsible drinking message. Advertisers should also identify to users an appropriate responsible drinking website.

Age Affirmation

Age affirmation is a process by which users provide their full date of birth and country of access to affirm they are of legal purchase age.

6. **Age Restriction, Targeting or Affirmation Technologies** should be used, where available, for all digital marketing controlled by alcohol beverage advertisers, to restrict access to users of legal purchase age or over.

Examples of how to use these techniques to meet best practice include:

- 6.1. **Direct Marketing Communications** directed to a specific person, for example e-mail, SMS and Twitter, should only be directed to consumers who have provided an age affirmation that they are of legal purchase age or over.

- 6.2. **Download Advice, Forwarding Notices, Responsible Drinking Messages or Age Affirmation mechanisms** should, where possible, be included on all digital marketing communications that are intended to be shared, such as with a 'share', 'download' or 'email' option.

Download Advice and Forwarding Notices are instructions to individuals forwarding or downloading the content that they should not forward the material to individuals below the legal purchase age.

- 6.3. **Website Age Affirmation Pages** (website landing pages that require visitors to confirm they are of legal purchase age before they can enter a website) should be used on all websites controlled by alcohol beverage advertisers.

It is recommended that the following age affirmation measures be adopted:

- Users should be required to input their date of birth and country of access to affirm they are of legal purchase age (for example from a drop down menu) rather than being allowed access through clicking a default option.
- If a user enters a birth date that equates to being under legal purchase age they should be given an appropriate alcohol social responsibility message, or redirected to an appropriate responsible drinking website.
- Repeat users may be invited to set up a "remember me" option but the invitation should warn on the appropriateness of this option if the computer may be used by someone under the legal purchase age.
- Users that have affirmed their age on a site may access a related site without being required to re-affirm their age.
- Corporate websites with a primary purpose of communicating company information do not require an age affirmation page.

- 6.4. Digital marketing communications on a site or web page controlled by the brand advertiser that involve **direct interaction with a user** should require age affirmation by the user prior to full user engagement of that communication to determine that the user is of legal purchase age or over.

Direct interaction is a two-way communication between the user and the advertiser on a site or web page controlled by the advertiser.

- 6.5. A **Nanny Tag** should be placed on all websites controlled by alcohol beverage advertisers. A Nanny Tag describes the site's content in a format that parental control software detects.

7. **Proximity Marketing** should only be used in situations where people will be of legal purchase age or over, for example, in age restricted venues such as nightclubs or when directed to users who have been verified as legal purchase age or over.

Proximity marketing is a digital communication directed to recipients in a particular proximity via SMS or MMS.

8. **Digital marketing communications should be placed** only in media where at least 75% of the audience is reasonably expected to be of legal purchase age or over.
9. **Downloadable applications** should only be made available where at least 75% of the audience is reasonably expected to be of legal purchase age or over.

User Generated Content

User generated content (UGC) is material that has not been created by or for a brand owner but by a person interacting on the digital platform.

10. **UGC** within digital platforms, controlled by an alcohol beverage advertiser is within the scope of the ABAC.
11. To contribute UGC a user must affirm by their date of birth that they are legal purchase age or over.
12. House rules should be accessible to registered users and clearly set out what is and isn't acceptable UGC. Annexure A is a sample set of House Rules that cover the ABAC standards, which should be adapted into the style / voice of the brand to encourage uptake.
13. Where possible, a mechanism should be available to provide users with an opportunity to notify the advertiser of any content they consider is unacceptable (such as "report inappropriate content" links, "alert administrator" buttons or the provision of contact details).
14. **Moderation** of UGC within a digital platform, controlled by alcohol beverage advertisers, should be carried out by either pre-moderation or post moderation.

14.1. Pre-moderation is where UGC is approved before it appears on brand controlled digital platforms.

- Where possible, automated software should be used to identify and remove inappropriate content.

14.2. Post-moderation is where UGC is checked by an alcohol advertiser after it appears and is removed if considered to be in breach of the ABAC Code or the AANA Code of Ethics.

If post moderation is used the following measures should be taken:

- Where possible, automated software should be used for identifying and removing inappropriate content.
- The site should be moderated at least once every business day and also on non-business days if the brand undertakes activity on the site during those non-business days.
- The site should be moderated immediately after the brand posts or engages and for at least two hours following the post.

For more information please contact ABAC Administrator at info@abac.org.au

Annexure A – Sample User Generated Content House Rules

[This sample set of House Rules address compliance with the ABAC only. A company may expand its guidelines to address other issues, including legal obligations and other relevant codes of practice and use its own language designed to encourage users to engage with the House Rules.]

All content on our website, including content posted by users of the site, must comply with the Alcohol Beverages Advertising (& Packaging) Code to ensure all our marketing communications are socially responsible. Accordingly all content posted by users of this site must comply with the following rules. Any content that does not comply with the Rules will be removed and may result in de-registration from this site.

- It must present a mature, balanced and responsible approach to the consumption of alcohol beverages;
- It must not encourage or promote offensive behaviour, misuse or abuse of or excessive consumption of alcohol beverages;
- It must not encourage underage drinking or have a strong or evident appeal to children or adolescents;
- It must not suggest that the consumption or presence of alcohol beverages can change a mood or environment;
- It must not show the consumption or presence of alcohol beverages as leading to personal, business, social, sporting, sexual or other success;
- It must not imply or suggest that an alcohol beverage shown as part of a celebration was a cause of the success or achievement;
- It must not suggest that the consumption of alcohol beverages offers any therapeutic benefit or is a necessary aid to relaxation;
- It must not associate consumption of alcohol beverages with operating a motor vehicle, boat or aircraft or engaging in any sport or potentially hazardous activity;
- It must not challenge or dare people to drink or sample a particular alcohol beverage;
- It must not contain any inducement to prefer an alcohol beverage because of its higher alcohol content;
- It must comply with community standards of taste and decency, particularly as to discrimination, vilification, objectification of people, violence, sex sexuality or nudity, language, health and safety;
- It must not bring the ABAC Scheme into disrepute;
- Any images uploaded to the site must only include people over 25 years clearly depicted as adults unless they are children and adolescents pictured in natural situations (e.g. family barbecue, licensed family restaurant) and where there is no implication they will consume or serve alcohol beverages.