

Code for Advertising Liquor

Submission of the
Alcohol Advisory Council of New Zealand

March 2011



ALAC SUBMISSION ON THE CODE FOR ADVERTISING LIQUOR

Thank you for the opportunity to make a written submission on the review of the Advertising Standards Authority Code for Advertising Liquor. We would be pleased to provide further information or have further discussions with the Codes Review Panel.

The Alcohol Advisory Council of New Zealand, *Kaunihera Whakatupato Waipiro o Aotearoa* (ALAC) was established by the Alcohol Advisory Council Act in 1976. We are an autonomous Crown entity under the Crown Entities Act 2004 with a specific focus on alcohol. Our prime objectives, as outlined in our governing legislation, are to:

- encourage and promote moderate consumption of alcohol
- reduce and discourage the misuse of alcohol
- minimise the personal, social, and economic harm resulting from alcohol misuse.

ALAC's policy position is that the principles and codes for advertising and promotion of alcohol should be enshrined in law, rather than being voluntary. ALAC believes a whole of government process, similar to 'Smokefree', should be initiated to deal with alcohol promotion.¹

Changes to the regulatory system are unlikely to be made as part of the current law reform process, so ALAC therefore appreciates the opportunity to contribute to this review of the ASA Code for Advertising Liquor. Our submission outlines our views on alcohol advertising and provides a broad response to the questions outlined in the December 2010 consultation paper.

ALAC's submission is based on our evidenced informed view that young people are particularly at risk of alcohol-related harm. In our terminology, a young person is under 25. However, we understand that for the purposes of the advertising review a young person is below the legal age for purchasing alcohol.

¹ The 'Smokefree' process restricted tobacco advertising progressively over time, beginning with the ending of tobacco advertising on television and radio followed by cinema advertising and outdoor billboards. Health warnings on cigarette packets were first voluntary and then were made compulsory. The Smoke-free Environments Act 1990 led to a ban on print advertising and strict restrictions on shop signs followed by the phasing out of tobacco sponsorship.

KEY AREAS OF CONCERN ABOUT ALCOHOL ADVERTISING

The promotion of alcohol products in New Zealand generally reinforces the drinking norm which is one that generally accepts, tolerates, and to some extent celebrates, binge-drinking and drunkenness.

Research has found that there is a statistically significant relationship between the level of exposure to alcohol promotion and the level and patterns of alcohol consumption, particularly for young people.

Anderson et al (2009)² provide an assessment of the impact of alcohol advertising and media exposure on future adolescent alcohol use by considering the results of 13 longitudinal studies. Their review found that exposure to media and commercial communications on alcohol is associated with non drinking adolescents starting to drink alcohol and with increased drinking among those who already drink.

The Science Group of the European Alcohol and Health Forum (2009) also reported that there is consistent evidence to demonstrate an impact of alcohol advertising on the uptake of drinking among non-drinking young people and increased consumption among their drinking peers.

The University of Sheffield paper *The Independent review of the effects of alcohol pricing and promotion* (June 2008) finds there is evidence to suggest that point of purchase promotions are likely to affect the overall consumption of underage drinkers, binge drinkers and regular drinkers, and that exposure to advertisements increases the likelihood of young people starting to drink, and the amount they drink.³

The British Medical Association paper *Under the influence – the damaging effect of alcohol marketing on young people* (September 2009)⁴ notes that alcohol marketing communications come in many forms, from traditional advertisements on television through ubiquitous ambient advertising to new media such as social network sites and viral campaigns. The cumulative effect of this promotion is to reinforce and exaggerate strong pro-alcohol social norms. The research concludes that advertising and other promotions influence the drinking decisions of young people and this provides strong evidence to argue that young people should not be exposed to alcohol advertising, sales promotions and sponsorship. Further, Babor and others note that:

“the promotion of alcohol is an enormously well funded, ingenious and pervasive aspect of modern life. Alcohol advertising predisposes minors to drinking well before the legal age of purchase. Marketing strategies such as alcohol sports sponsorships embed images and messages about alcohol into young people’s everyday lives. The climate created by sophisticated alcohol marketing has facilitated the recruitment of new cohorts of young people to the ranks of heavier drinkers and has worked against health promotion messages.”⁵

² Anderson, P (2009) ‘Impact of alcohol advertising and media exposure on adolescent alcohol use: A systematic review of longitudinal studies’, *Alcohol & Alcoholism*, vol.44, no. 3, p. 229-243

³ Booth, A et al (2008) *The independent review of the effects of alcohol pricing and promotion, summary of evidence to accompany report on phase 1: systematic reviews*, London: School of Health and Related Research Available at: http://www.dh.gov.uk/en/Publichealth/Healthimprovement/Alcoholmisuse/DH_4001740 (Accessed 7 October 2009)

⁴ Hastings, G and Angus, K (2009) *Under the influence: The damaging effect of alcohol marketing on young people*, London: British Medical Association Board of Science Available at: http://www.bma.org.uk/health_promotion_ethics/alcohol/undertheinfluence.jsp# (accessed 7 October 2009)

⁵ Babor, T. F., Caetano, R., Casswell, S., Edwards, G., Giesbrecht, N., Graham, K. M., et al. (2010). *Alcohol: no ordinary commodity: research and public policy* (2nd ed.). Oxford : New York: Oxford University Press, p 187.

ALAC is particularly concerned about the impact of alcohol promotion on young people. We believe that the Code for Advertising Liquor could be strengthened to help reduce alcohol related harm, particularly for young people.

Was ALAC aware of the ASA Code for Advertising Liquor prior to making this submission?

Did ALAC know how to make a complaint about alcohol advertising?

ALAC is well aware of the workings of the ASA and the Code for Advertising Liquor. ALAC has made a number of complaints concerning alcohol advertising and promotions.

There are few complaints made concerning liquor advertising.

We are concerned that the Liquor Code and the complaints process are not well known by the general public of New Zealand. The number of complaints received does not seem to reflect the level of concern about alcohol advertising being expressed by the community. We believe the complaints process should be more actively promoted. Perhaps there could be a requirement for each major television alcohol campaign to fund an (unrelated) advertisement advising of the complaints process, in the same way the Broadcasting Standards Authority complaints process is promoted by broadcasters.

ALAC believes the means of making a complaint could be made more accessible. We note there is an online complaints form, but the use of other social media to promote the Code would make it easier for young people concerned about advertising to make complaints.

ALAC notes that there is no allowance for any kind of audit or monitoring of Advertising Standards Complaints Board decisions. ALAC believes that along with the regular review of the codes, there should be a regular audit or independent review of ASCB decisions, and a report presented to the ASA. The report should also be publicly available. This monitoring report would help ensure future decisions are robust and fair.

Assessment of current process and suggestions for improvement

ALAC would like to draw your attention to a number of issues about the current process.

Complaint and response

When a concerned citizen or group writes to the ASA with a complaint, or fills out the online complaints form, the advertiser is, quite rightly, given the right to respond. In the case of brand advertisements, the response is usually a reasonably weighty document, likely to have been drafted by the lawyers of one of the major producers. This legal view given in response is usually more detailed and more carefully constructed than the complainants letter, and receives considerable attention in written decisions of the Complaints Board. We believe this is unbalanced. We do not think the drafting of the complaint letter should have such an important effect on the progress of the complaint.

The paper in defence of the complaint usually addresses the exact detail of the complaint, which in turn leads to the ASCB considering the detail of the complaint against the detail of the Code for Advertising Liquor. In ALAC's view, when a complaint is raised against an advertisement, the Complaints Board should consider the totality of the advertisement against the totality of the Code for Advertising Liquor. It may be that the Complaints Board considers an aspect of the advertisement to be in breach of the code, whether or

not that aspect has been highlighted in the complaint letter. It could be useful for the complainant to have a right of reply, and in some instances, the complainant may wish to appear in person. ALAC suggests the review panel consider allowing this.

Should the Code for Advertising Liquor and the Code for Naming, Labelling, Packaging and Promotion of Liquor should be combined in a single code?

Yes.

Neither alcohol advertising or promotion should be considered in isolation, they generally work as a package. Combining the codes would mean the same general principles could apply across the spectrum of advertising and promotion. We note, however, that the Code for the Naming, Labelling, Packaging and Promotion of Liquor does not apply to on-licence premises activities and promotions. ALAC considers that this is a major weakness of this Code and on-licences should also be included.

ALAC believes that it is timely to consider whether alcohol product labelling should continue to be regulated as a 'food' or whether it best fits under the new alcohol legislative regime. We are of the view that it is more appropriate to regulate alcohol labelling under the new alcohol legislation. A combined code would be useful vehicles for dealing with aspects of alcohol labelling.

Should all complaints about liquor advertising and promotion be considered by a separate specialist complaints board?

Yes. A separate complaints board could be convened with a clear mandate to ensure that alcohol advertising does not contribute to alcohol-related harm, particularly for young people. Specialist knowledge could be represented on the Complaints Board, as well as community and industry representatives.

DEFINITIONS AND PRINCIPLES

Are the above definitions clear and do they provide sufficient guidance?

Is further guidance required? If so, in what areas?

ALAC has no issue with the definitions provided in the Code for Advertising Liquor. We note that the definition and use of the word 'minor' may become problematic if New Zealand has two different purchase ages as proposed by the Alcohol Reform Bill. ALAC would like to see the age used in the Code to differentiate between adults and what are currently called 'minors' to be 20 years.

PRINCIPLE 1

Liquor advertisements shall neither conflict with nor detract from the need for responsibility and moderation in liquor consumption.

Is it appropriate to require liquor advertisements to be consistent with the need for responsibility and moderation in liquor consumption?

If so, do the guidelines provide sufficient guidance on how to achieve this? If not, is further guidance required? In what areas?

In our view, liquor advertisements should **support** the need for responsibility and moderation in liquor consumption, particularly for young people.

But what does responsibility mean?

The guidelines for Principle 1 suggest advertisements should not emphasise a product's alcoholic strength, nor glamorise liquor or association with liquor. While the Code emphasises the guidelines are examples and are not exhaustive, in this case the guidelines could be expanded and strengthened.

The Alcohol Reform Bill sets out in clause 224 (4) what it means to supply alcohol in a responsible manner to a minor. The court may consider the following:

- (a) the steps taken by the supplier to supervise the consumption of alcohol
- (b) whether food was provided with the alcohol
- (c) whether a choice of low-alcohol or non-alcoholic beverages, or both, was offered
- (d) the nature of the occasion
- (e) any arrangements for, or provision of, safe transport
- (f) the period over which the alcohol was supplied
- (g) the quantity of alcohol supplied
- (h) the age of the minor
- (i) any other matter it thinks relevant in the particular circumstances.

In terms of the advertising code, this should mean that advertisements, and in particular brand focused advertisements that show people drinking alcohol, should include activities and themes that show the responsible and moderate supply of alcohol. The settings depicted in advertisements should reflect a responsible environment as laid out in the Alcohol Reform Bill.

Alcohol content

The alcohol by volume of a product is regularly included in price advertisement flyers, from liquor stores and supermarkets. Young people in particular are known to consider the 'bang for buck' aspect of their alcohol purchases. Alcohol content does not need to be emphasised in advertisements, and should not help to make products attractive to young people. The code could prohibit the advertising of alcohol strength for beverages when it is above 2.5%. ALAC considers that this is different to labelling that specifies standard

drinks and alcohol content as consumer information. The intention is to ensure that alcohol content is not a promotional aspect to make beverages attractive.

PRINCIPLE 2

Is it appropriate to require liquor advertisements to observe a high standard of social responsibility?

If so, do the guidelines provide sufficient guidance on how to achieve this? If not, is further guidance required? In what areas?

As aptly noted by Solomon:

“Loyalty is half of business ethics, but social responsibility is the other half”.⁶

Alcohol is a potentially dangerous drug, rather than an ordinary commodity, and should be treated as such. Consequently, ALAC would expect that, while alcohol advertising continues to be largely unregulated by statute, the Code should ensure that the alcohol industry applies a high standard of social responsibility to all marketing. This is particularly so, given the research that suggests a strong link between the level of exposure to alcohol promotion and the level and patterns of alcohol consumption (particularly for young people) and the high level of acute alcohol-related harm (typically caused by binge-drinking) that New Zealand has in comparison to other countries.

ALAC believes the issue lies more with the interpretation of the guidelines rather than the wording. For example, taking the wording of the guidelines literally, and from an alcohol harm reduction lens, it is difficult to see how particular advertisements (such as the Woodstock ones) could be seen as observing a high standard of social responsibility. In fact this view was also shared by some of the Board members who considered the complaint on the Woodstock advertisement:

“the appearance and behavior of the young man in the advertisement and the use of the double entendre breached a number of code requirements and the advertisement was therefore in breach of Principle 2 of the Code...”. The complaint was not upheld. (ASCB, Decision 09/687 refers).

It really comes down to the interpretation of the guidelines, what lens is applied and whether there is any consideration about how the target audience is likely to view the advertisement in relation to each of the specific guidelines (e.g. is it more likely that the target audience would view the advertisement as sexually provocative or suggestive, than not?).

We note that appendix 1 to the consultation paper provides the Panel’s definition of what social responsibility means. We agree that in interpreting the Code emphasis should be placed on compliance with both the principles and the spirit and intention of the Code and that it is possible for an advertisement to be in breach

⁶ Solomon, R.C. (1994). *The new world of business: Ethics and free enterprise in the global 1990’s*. Lanham, MD: Rowman & Littlefield.

of the principle without being in breach of a specific guideline. We would therefore support that such a statement, along similar lines, be made upfront in the Code.

While, this type of contextual statement may go some way to reminding the members of the Board to take into consideration the spirit and intent of the Code when interpreting its wording, other improvements (mainly process ones) are also required to ensure that it happens in practice.

ALAC also notes that the guidelines for 'social responsibility' are detailed, and are in part based on a June 2000 publication by ALAC. *The National Guidelines on the Naming, Packaging and Merchandising of Alcoholic Beverages* is not the most recent document. The ASA's own *Code for the Naming, Labelling, Packaging and Promotion of Liquor* could be used instead.

There is often a high standard expressed in the Principles of the Code, such as social responsibility, but it is often watered down by the Code Guidelines, and by the interpretation of them. For example, Guideline 2(d) is particularly problematic. It requires that advertisements shall not be sexually provocative or suggestive or suggest any link between liquor and sexual attraction or performance. However, the use of attractive and scantily clad women in beer commercials and promotions has been judged to be acceptable, and that the idea that it's okay for 'your mate's mum to give you a woody' is not considered sexually suggestive.

The use of humour should not be considered sufficient to negate the impact of what is clearly sexually suggestive. While this may not have 'special' or 'particular' appeal to minors, it does have strong appeal to them, as well as to adults. Is the continued use of such humour in relation to sexual themes and alcohol really socially responsible?

PRINCIPLE 3

Is it appropriate to require liquor advertisements not depict or imply the consumption of liquor in hazardous situations or include unsafe practices?

If so do the guidelines provide sufficient guidance on how to achieve this? If not, is further guidance required? In what areas?

Are there any other prizes that should not be offered in liquor advertisements?

ALAC supports this principle. As with many of the other principles, it depends on the perception of hazardous behaviour. The leaping of fences and walls, however improbable, could, and should be considered hazardous behaviour. Humour or hyperbole should not be a defence for activities which could be in breach of the Principle.

PRINCIPLE 4

Exposure of young people to advertising

The Review of the Regulation of Alcohol Advertising 2007 noted that Principle 4 requires that advertising should be directed at adults (and elaborates with, for example, the age of actors in advertisements), that advertising should not be directed at minors, nor have strong or evident appeal to minors in particular. It also requires that television advertisements must screen after 8:30pm, and it limits the number of advertisements per hour. The review report notes that the code focuses on content of advertising, and there are no rules on placement for other media. While the Code for Advertising Liquor enables censure for targeting children, there are no restrictions on advertising with youth-oriented content likely to appeal to young people under 18 along with the target audience of adults over the age of 18.

ALAC understands that limiting exposure of young people to alcohol promotion is a complex issue (e.g. Heineken is the “worldwide partner and the official beer of the Rugby World Cup”). However there are some things that could be done within the Code that could improve the current situation and further limit youth exposure to alcohol advertising.

Is it appropriate to require liquor advertisements to be directed at adult audiences and to not have particular appeal to minors?

It is inadequate to simply require liquor advertisements to be directed at adults, and to not have particular appeal to minors.

Young people are more susceptible to alcohol harms than older New Zealanders. Research has shown that awareness of alcohol advertising does impact on young people’s consumption and intentions to purchase.⁷ Harms and consumption problems for young drinkers are limited by more stringent and alcohol control policies, particularly policies affecting alcohol availability and marketing.⁸

In order to protect children and young people from alcohol advertisements, a more thorough approach is required. Also, given the product cannot be legally sold to “minors” (as per the definition in the Code), then it stands that companies should not be permitted to allow sales messages, or marketing, to be disseminated to this group.

Children’s exposure to advertising

Whilst some argue that young people are quite savvy at interpreting and dispelling misleading marketing messages, this isn’t true for a large number of young people. Young people are vulnerable to messages that tap into their desire for social success – this desire is inherent to their developmental phase. And brain development research now clearly indicates that they are less able to think about long-term consequences, making them especially unable to consider the ramifications of alcohol consumption.⁹

Children are exposed to billboards, sports and other clubs or events sponsorship, material through the postal mail, and internet advertising. In the Government-initiated 2007 Review of the Regulation of Alcohol Advertising regulations, 107 submissions were received from young people. The general stance of these submissions was that alcohol advertising had a negative effect on youth (Litmus, 2007). They also thought that it impacted on their peers behaviours, and that the advertising portrays alcohol drinkers as cool, having fun, and being stereotypically male. In a number of ALAC’s consultations, young people have expressed concern about alcohol advertising and feeling targeted.

⁷ (Alcohol No Ordinary Commodity, 2nd Edition).

⁸ Paschall, M., Mallie, J., Grube, J., Kypri, K. Addiction, Nov 2009, vol 104 Issue 11

⁹ (Steinberg, L., Trends in Cognitive Science, Vol 9, No.2 February 2005).

'Targetted at' versus 'appealing to'

Simply because an advertiser can demonstrate their intended audience to be over the purchase age does not mean the alcohol messages do not have reach to a younger audience. In fact sometimes marketing targeted at adults can be even more appealing to a younger audience. Evidence shows young people aspire to be approximately four years older than they actually are. Young people commonly carry and pass on branded messages from alcohol companies that were apparently designed for an older audience (e.g. Crack a Woody Day, based on the Woodstock campaign of the same name, which has a Facebook page run and supported by 3,428 mostly young people).

In effect it means that a good deal of adult-targetted advertisements may have undue influence on minors.

That is why, for example, France restricts alcohol advertisements to focus on the qualities of the product in its Loi Evin regulation. The drinkers and drinking environments are not to be depicted, and the advertisements are restricted in where they can be shown. Young people are not allowed to be targeted.

Another alternative could be a more compliance-heavy vetting system which tests alcohol advertisements with a younger audience prior to their publication. But there would be significant ethical issues with deliberately exposing children to alcohol marketing. It would also need to be conducted by independent persons. This style of system could however provide for a more reliable protection of children and youth from exposure to advertising with appeal to them.

ALAC would like to see the onus of proof lying with the advertiser. The advertiser should have to prove the advertisement does not have appeal to young people, rather than showing the advertisement targets adults.

What other requirements would provide sufficient guidance?

Any advertisements that do any of the following would have undue appeal and influence with a younger audience, and should therefore be restricted (alongside existing restrictions):

- promotes any association between alcohol consumption and social success
- has sexual themes and or implies sexual success
- promotes any association between alcohol consumption and success
- has aspirational messages of adulthood or manhood – because this audience are trying to decipher what it means to be an adult
- is associated with sport, music or cultural identity
- is promoted in mediums which young people frequently use, or during times that young people are viewing, attached to any programming popular with a young audience, etc
- utilises trends and fashions popular with young people at the time of publication, or activities normally associated with young people.

Viewing times

The viewing times are a great concept but in reality many young people watch late-night television and are exposed to alcohol marketing through other means (internet, billboards, sponsorship and the like).

Another complementary strategy along these lines would be to restrict alcohol advertising where young people make up 30% of the audience (e.g. USA voluntary code for trade associations of beer, wine and spirit production). However if there is programming that has particular appeal to young people – e.g. sports, there should be no alcohol advertising.

Television advertising should be banned between 6:00am and 9:30pm to protect children.

Heroes of the young

ALAC agrees with this restriction. Young people also aspire to be like their peers and adults that they know (e.g. parents and sports coaches). Therefore these type of heroes should also be prohibited. We note also that alcohol advertising is also good at inventing heroes of its own – the Tui boys breaking into the brewery, The Southern Man. In receipt of a complaint concerning heroes of the young, it would be useful if the ASCB

was able to canvas young people themselves about who their heroes are, rather than relying on the view from ASCB members.

PRINCIPLE 5

Sponsorship advertisements and sponsorship credits shall clearly and primarily promote the sponsored activity, team or individual. The sponsor, the sponsorship and times incidental to them, may be featured only in a subordinate manner.

Is it appropriate to restrict sponsorship credits and advertisements to feature the sponsor only in a subordinate manner?

If so, do the guidelines provide sufficient guidance on how to achieve this? If not, is further guidance required? In what areas?

ALAC generally supports this principle.

ALAC considers that events should not have alcohol brands as part of the event name, for example Jim Beam Homegrown or the 2010 Steinlager Rugby Awards. While the events may not feature in alcohol advertisements, they feature in advertisements or reports of the events, giving greater exposure of the association between alcohol and the event. The guidelines to the Code could include the issue of naming rights as an example of how credits are not subordinate.

The regulatory system is even more liberal when it comes to sponsorship and this is unlikely to change in the near future as part of the current alcohol reform process. There are currently no provisions within the Alcohol Reform Bill that explicitly address sponsorship. As such, it continues to be easy to give alcohol brands naming rights to events. A music festival (Jim Beam Homegrown), or awards (the 2010 Steinlager Rugby Awards), and our rugby grounds (Tui) have a great deal of influence and special appeal to young people. Such sponsorship messages have no time of day restrictions, unlike television commercials, and have wide reach, even featuring in news broadcasts. In ALAC's view it is inappropriate for alcohol brands to be able to have naming rights sponsorship.

PRINCIPLE 6

Liquor advertisements shall not by any means, directly or by innuendo, contain any misleading description, claim or comparison about the product advertised, or about any other product, or suggest some special quality which cannot be sustained.

Is it appropriate to require liquor advertisements not to contain misleading descriptions, claims or comparisons or suggest a special quality that cannot be sustained?

If so, should there be guidelines on how to achieve this? In what areas?

Liquor advertisements, like any other product, should not claim directly or indirectly anything that cannot be sustained. ALAC notes the trend for the marketing of alcohol products to focus on properties of the product such as low-carbohydrate, no additives, pure New Zealand ingredients. The perception is that these products are somehow better than other products with different ingredients.

While most alcohol products are exempt, under the Food Standards Code, from including nutritional panels and ingredients, some producers are using nutritional information and ingredients in a way that implies that alcohol is healthy. Four Steinlager products provide a good example of how the selective use of ingredients and nutritional information on labels can imply that alcohol is possibly “good for you”:

- *Steinlager Pure*: highlights that there are no additives or preservatives, and lists the following ingredients: NZ water, malted barley, hops and yeast.
- *Steinlager Classic*: highlights that there are no additives or preservatives but, unlike Steinlager Pure, lists no ingredients.
- *Steinlager Edge*: highlights that there are no additives or preservatives and provides a nutritional panel emphasising that the beverage has half the carbohydrates of other beer.
- *Steinlager Premium Light*: makes no mention of additives or preservatives, neither does it list any ingredients. What is mentioned however is that the “finest natural ingredients” are used in this product.

The Steinlager example highlights an inconsistency in the way in which ingredient and nutrient information is used. It also demonstrates how the selective use of such information can be potentially misleading to consumers.

In light of this, and consistent with previous advice to FSANZ on this subject, ALAC remains strongly of the view that producers of alcohol products of 1.15% or more should not be able to make nutrient content claims related to energy, alcohol and carbohydrate or claims to natural ingredients without also providing information on the health risks of immoderate consumption.

ALAC's view is that if industry chooses to highlight these nutrient or natural ingredient content claims alongside their general position that alcohol products are good for health (and we believe the likelihood of this occurring is high) then this could lead the public to believe that alcohol consumption per se is healthy

and this is not the case. Any nutrient or other health benefit is lost as soon as the consumer becomes intoxicated. Further, there are some population groups for whom any alcohol consumption is unhealthy (e.g. pregnant women and minors in terms of physiological and brain development).

Consequently ALAC is of the firm view that producers of alcoholic beverages should be prevented from including ingredients and nutritional information in a way that implies that the alcohol is healthy without also providing information on the health risks of excessive consumption.

It is very important that no alcohol product is seen as being healthy, and ALAC believes the Code should reflect this. A guideline requiring that no advertisement suggest an alcoholic beverage is healthy or 'good for you' could be added.