

**Report of the Working Group on Regulating Sponsorship by
Alcohol Companies of Major Sporting Events**

December 2014

1. Introduction

The Working Group on Regulating Sponsorship by Alcohol Companies of Major Sporting Events was established on foot of a Government decision in 2013. This decision noted the excessive patterns of alcohol consumption and resultant social, economic and health harms as set out in the Report of the Steering Group on a National Substance Misuse Strategy. The Report considered that a broad range of complementary measures is required to successfully reduce consumption of, and harms associated with, alcohol.

The Government agreed that Ireland should set as a target for 2020 the OECD average consumption level of alcohol.¹ Government also approved the drafting of a health oriented Public Health (Alcohol) Bill to provide for a package of measures. This will include establishing a regime of minimum unit pricing for retailing of alcohol products; regulating the marketing and advertising of alcohol; achieving the structural separation of alcohol from other products; ensuring the health labelling of alcohol products; and regulating sports sponsorship and placing the existing voluntary code that governs sports sponsorship on a statutory footing.

In relation to the last decision concerning the regulation of sports sponsorship, Government recognised the public health concerns associated with alcohol sponsorship of sport, while acknowledging the potential impact of any regulatory measures on funding for sports organisations. In light of these concerns, Government agreed to establish a Working Group on Regulating Sponsorship by Alcohol Companies of Major Sporting Events to

“consider the value, evidence, feasibility and implications (including the public health consequences for children and young people and the financial impact on sporting organisations) of regulating sponsorship by alcohol companies of major sporting events. In

¹ The OECD average is 9.1 litres of pure alcohol consumed per person over 15 in the population per annum (the most recent figure for Ireland is 11.6 litres in 2012) [see World Health Organization 2014]. The Department of Finance and Revenue Commissioners use consumption per capita figures which are slightly lower than the OECD calculations. This is because the OECD methodology assumes all beer products have an alcohol by volume (ABV) content of 4.3% whereas the Revenue Commissioners publish figures indicating the exact amount of alcohol reported to Revenue in relation to beer products released for consumption, which indicates that the average ABV content of beer released for Irish consumption is just below 4.2%. For 2012, the Department of Finance have estimated per capita consumption of those aged 15 or older at 11.5 litres whereas the OECD methodology gives a figure of 11.6 litres.

addition, the Group was asked to consider alternative sources of funding for sporting organisations to replace potential lost revenue arising from any such regulation.”

The Group has been chaired by the Department of the Taoiseach and includes several other Departments (see Appendix 1 for a full list). The Group has met five times since December 2013.

In deciding on its approach, the Working Group noted that there was already a significant amount of work and consultation with key stakeholders in this area, in particular, by the National Substance Misuse Strategy Steering Group and more recently by the Joint Oireachtas Committee on Transport and Communications.

Following an initial analysis of the relevant information (literature, research, data, reports etc) available, the Group set about identifying where information gaps existed and where further evidence\input was required. Based on this exercise, the Group drew up a list of questions seeking additional information with a view to gathering evidence-based material to allow a complete and comprehensive understanding of the issues (see questionnaire at Appendix 2). This was circulated to key stakeholders identified by relevant Departments.

A public request for submissions was also posted on the Department of the Taoiseach website. Nineteen submissions were received (a list is provided in Appendix 3) and these submissions are available on the Department of the Taoiseach website (see http://www.taoiseach.gov.ie/eng/News/Government_Press_Releases/Working_Group_Consultation_Sports_Sponsorship_by_Alcohol_Companies.html).

This report draws extensively on those submissions, as well as the input and deliberations of the members of the Group. It is organised as follows:

Section 2 summarises the individual, social and economic costs of excessive alcohol consumption in Ireland. Section 3 examines the impact of sports sponsorship as a standalone marketing tool and as an integral part of other marketing and promotion activities.

Section 4 investigates what impact further regulation of sports sponsorship would have on alcohol consumption and looks at research from other jurisdictions. Section 5 estimates the

financial value of alcohol sponsorship to sporting organisations and tries to gauge what impact any loss of this funding would have on the sports sector and whether there are other funding supports available for sporting organisations. Section 6 examines what further options could be considered for the regulation of sports sponsorship, short of a ban, and whether there are ways to make the existing Voluntary Code of Practice more effective.

Finally, Section 7 sets out a spectrum of options identified through the Group's work and lists the advantages and disadvantages of each approach.

2. The costs of alcohol consumption

Although Ireland's per capita consumption of alcohol has declined from a high point in 2001, it is still, from a comparative perspective, unusually high. It is not only that consumption levels per person are at an elevated level but the Irish pattern of drinking is also distinctive. The World Health Organization (WHO) found that 39% of all Irish people age 15 years and over had engaged in so-called 'binge drinking' — labelled 'heavy episodic drinking' by the WHO — in the previous 30 days. This level was exceeded only by Austria of the 194 countries assessed. Over half of drinkers in Ireland were identified as having a harmful drinking pattern. This equates to nearly one and a half million adults in Ireland drinking in a harmful pattern. Harmful drinking in Ireland is highest amongst the 18-24 year old age group at 75%. Over half of Irish 16 year old children have been drunk and one in five is a weekly drinker.

This is the context that led the Steering Group on a National Substance Misuse Strategy to consider that the consequences of the harmful use of alcohol required the implementation of further measures to protect and preserve individuals' and public health. It is worth noting that even before the introduction of the proposed further measures that alcohol consumption has been declining in Ireland for over a decade. In 2001, it stood at 14.5 litres per person over 15 years of age per annum but by 2012 it had declined to 11.6 litres.

3. Impact of sports sponsorship as a standalone marketing tool and as part of an integrated marketing tool to promote alcohol consumption

3.1 Is it possible to distinguish clearly between sports sponsorship and other sports-related marketing/advertising activities?

Sponsorship generally can be described as a partnership between a sponsor company and a rights holder organisation to link their organisations through support of a particular activity. Other marketing activities can be undertaken to promote this association such as advertising, product placement and sales promotions, whereby the core sponsorship deal is the basis for these associated marketing tactics.

The voluntary *Code of Practice for Sponsorships by Alcohol Drinks Companies* defines sponsorship as “a commercial agreement by which a sponsor, for the mutual benefit of the sponsor and sponsored party, contractually provides financing or other support in order to establish an association between the sponsors’ image, brands or products and a sponsorship property in return for rights to promote this association and/or for the granting of certain agreed direct or indirect benefits”.

As is obvious from this definition, it would be highly unusual for sports sponsorship to occur without being supported by other ancillary marketing activities. Whilst it is possible, in principle, to distinguish between the two forms of marketing, in practice it is exceedingly difficult to untangle the specific impacts each might have.

The difficulty in distinguishing/isolating sports sponsorship from other sports-related marketing or advertising activities impacts fundamentally on the Group’s Terms of Reference. It seems clear that sponsorship is rarely if ever used on its own but is supported by a mixture of related advertising and/or promotional activity. Some submissions refer to the perceived specific impact of sports sponsorship, for example by brand associations with sports and athletic activity or bypassing regulation of other promotional activities. However most seem to accept that sponsorship is usually part of an integrated marketing approach with one submission claiming that brands spend twice as much activating sponsorships as they do for ownership rights.

Thus it is difficult to draw any definitive conclusions about what impact, if any, restrictions on alcohol sponsorship of sports events would have as opposed to placing limits on other forms of marketing such alcohol advertising at sports events.

3.2 What is the evidence of the specific impact of sports sponsorship on its own?

Given the intertwining of sports sponsorship and general marketing tools elaborated above, it can be difficult to disentangle the effect of sports sponsorship on its own. However, the effects of sports sponsorship are usually assessed from the perspective of the financial benefits that can accrue and/or whether it raises consumer awareness of a particular product leading to increased consumption.

On a global scale, the spending on sport sponsorships engagements has increased from US \$20 billion in 2004 to US \$35 billion by 2013 (PricewaterhouseCoopers, 2010). It is generally accepted that the share prices of companies react positively to sports sponsorship arrangements, but this result can vary according to the sport being sponsored and the global region in which the arrangement takes place (Reiser et al. 2012).

In terms of raising consumer awareness, a consensus exists that this occurs through securing customer loyalty through brand differentiation. The link between sponsorship and purchase is secured through association with a consumer's favoured team or sport. Essentially, consumers rely on the association principle that if a brand is good enough to back a much-loved sport, then it's good enough for us (Wakefield and Rivers 2013). Research notes that sponsorship can foster associations between the sport in question and particular products. For example, Pettigrew et al (2013) found that 76 per cent of a sample of children aged 7-12 years old connected at least one correct sponsor to the relevant sport. However some of the submissions suggested that sponsorship may do more than cultivate distinctions between different brands and might have a causal effect on drinking levels and patterns.

However there is a scarcity of domestic studies to measure the impact of sports sponsorship by alcohol companies and it is not clear the extent to which social norms or accepted cultural behaviour in Irish society influence drinking behaviour compared to alcohol industry sponsorship of sporting events. One view submitted was that the burden of proof should be

to demonstrate that sports sponsorship is safe, while others point to recent declines in alcohol consumption in Ireland while there is high profile sports sponsorship. Again the question arises whether the impact of sponsorship is achieved through raising awareness of one brand over another, or on overall consumption.

3.3 What evidence is available on the impact of sports sponsorship as part of an integrated marketing tool to promote alcohol consumption?

It is worth noting that sports sponsorship can take extremely different forms and occur on many different levels. Thus, one form might consist of an association with a national team through a commercial arrangement whereas another might take the form of the support of a local club through the provision of alcoholic drinks. And the relation between sponsorship and alcohol consumption will depend on how sponsorship is structured and where it occurs. Thus the provision of alcohol to a local or club team would seem to have a more overt relation with alcohol consumption than a more indirect form of marketing. Generally, it has proven difficult to associate sponsorship alone with increased levels of alcohol consumption.

In terms of the evidence available on the links between general marketing, including sports sponsorship, and alcohol consumption, some research argues that exposure to alcohol advertising is correlated with increased levels of alcohol consumption. Gordon *et al.* (2011) demonstrates that adolescents who have had an alcoholic drink were significantly more aware of sponsorship of sports teams by alcohol brands. These results, from a cross sectional study of Australian adolescents, are consistent with studies from other countries and suggest that exposure to online alcohol advertisements is associated with underage drinking (Jones & Magee, 2011).

The European Health and Alcohol Forum (2009) reviewed 13 longitudinal studies that investigated the impact of marketing communications on initiation and continuation of alcohol use amongst 38,000 young people aged 10-21 years drawn from countries such as the United States, New Zealand, Belgium and Germany. Twelve of the thirteen studies reported an impact of exposure on subsequent alcohol use, including initiation of drinking

and heavier drinking amongst existing drinkers, with a dose response effect in the studies that reported such exposure, i.e. the greater the exposure to marketing leads to a higher likelihood of increased alcohol consumption. Based on these studies, the Forum concluded that 'alcohol marketing increases the likelihood that adolescents will start to use alcohol and to drink more if they are already using alcohol' (2009: 2).

A study of exposure to alcohol marketing in four European countries (de Bruijn *et al.* 2012) found that the frequency of exposure to alcohol marketing was shown to influence underage adolescents' alcohol expectancies as well as their drinking behaviour. They report that adolescents expect, due to online alcohol marketing, that alcohol will make them feel positive, activated and relaxed. Like other studies, it can be difficult to work out which way causal influences are operating and it may be that young people who are inclined to drink more alcohol are more likely to seek out such marketing. But countering this suggestion, the research did find that the marketing had an effect on people who were non-drinkers at the start of the study (de Bruijn *et al.* 2012: 9). The research also found that there was a dose-response effect: the association with binge drinking becomes stronger with high levels of exposure to online alcohol marketing. This finding was robust after controlling for media use, demographic and social factors. The study concluded that alcohol marketing on the internet was a serious but avoidable threat to adolescents' health (de Bruijn 2012)

Many studies do then point to a significant relationship between alcohol marketing and heightened alcohol consumption even though it is often difficult to work out the direction of causality. Submissions from the alcohol industry have noted this fact and argued that sponsorship is not used to recruit new customers but is used rather as a brand differentiator in a very competitive market. However some research, noted above, considers that higher levels of exposure to alcohol marketing drives increased levels of alcohol consumption.

It should be noted that some researchers are dubious about any claims about a relationship between alcohol advertising and alcohol consumption. In relation to adolescents' consumption of alcohol, Aspara and Tikkanen (2013) claim the evidence presented is not rigorous enough to establish any effect and is undermined by various methodological problems including exclusive use of the survey approach and reliance on self-reported subjective data.

Again, this evidence relates to marketing in general, and Government has announced a series of further measures to regulate marketing and advertising of alcohol. However it does not provide specific evidence on the impact of sponsorship, or sports sponsorship, as part of any overall marketing effort.

3.4 What evidence is available on the causal relationship between sports sponsorship on alcohol consumption, including by young people?

Given how closely sponsorship is bound up with other forms of marketing, it has proven difficult to document links between sports sponsorship and alcohol consumption although a few studies have investigated this relationship.

Research from Australia and New Zealand associates alcohol industry sponsorship of sportspeople/sports-clubs but this included provision of free or discounted alcoholic beverages which was associated more strongly with higher drinking (O'Brien and Kypri 2008).

Representatives of the alcohol industry have countered that this research included sponsorship in the form of alcohol being provided which, it is said, would naturally lead to more alcohol being consumed. However this finding that alcohol sponsorship of sport is associated with higher levels of alcohol consumption amongst sportspeople has been replicated in the United Kingdom. O'Brien (2014) and has shown that sportspeople receiving alcohol industry sponsorship at a team or club level were found to have twice the odds of being hazardous drinkers. A limitation of this latter research is that it is difficult to infer causality in that heavy drinking may lead people to seek out sports sponsorship rather than being driven by it. In fact, there is some research which argues that alcohol sponsorship acts as a reinforcer of attitudes which are already held, rather than creating attitudes and instigating behaviour [to drink alcohol] directly (Davies 2009).

It is worth noting that the samples in these studies are not representative of the general population. Given this limitation, any inferences drawn from their conclusions regarding general policy implications have to be made with care.

4. Impact of Further Regulation of Alcohol Sponsorship of Sport

4.1 What impact would further regulation of the sponsorship of sport by alcohol companies have on public health and related costs to the Exchequer of alcohol misuse?

Submissions on this issue tended to take two different perspectives. On the one hand, some groups elaborated on the harms caused by excessive alcohol consumption, as noted in Section 2, and concluded from this that further regulation is necessary. Many studies noted that it was difficult to predict what impact such moves might have on alcohol consumption although one submission suggested insights could be gained from looking at the example of bans on advertising and promotion of tobacco products. The World Health Organization has estimated that these moves led to an average fall of 7 per cent in overall consumption levels. One submission estimated that about a third of the alcohol companies marketing budgets go into sports sponsorship so a ban in this area could lead to falls of between 1.5-3 per cent in overall consumption leading to savings of between €18-36 million in overall health care costs [the basis for this calculation is not clear].

It is important to note that the Terms of Reference for the Working Group concern a very specific issue, namely the regulation of sponsorship by alcohol companies of **major sporting events** in Ireland rather than sports sponsorship in general. In terms of understanding what might be encompassed by the notion of a major sporting event in Ireland, it is worth looking at the Broadcasting Act 2009. Under this Act, the Minister for Communications, Energy and Natural Resources may designate sporting and cultural events as being of major importance to society and that events so designated should be available on a free-to-air television service. To designate an event of major importance to society, the Minister must have regard to a number of criteria particularly the extent to which the event has a special general resonance and a generally recognised distinct cultural importance for the people of Ireland.

Under these criteria, the following events have been designated as being of major importance to Irish society so that they should be broadcast on free-to-air television service (Ireland's games in the Six Nations Rugby Championship have been placed in a 'deferred' category whereby live coverage is not essential).

- The Summer Olympics
- The All-Ireland Senior Inter-County Football & Hurling Finals
- Ireland's home and away qualifying games in the European Football Championship & the FIFA World Cup Tournaments
- Ireland's games in the European Football Championship Finals Tournament and the FIFA World Cup Finals Tournament
- The opening games, the semi-finals and final of the European Football Championship Finals and the FIFA World Cup Finals Tournament
- Ireland's games in the Rugby World Cup Finals Tournament
- The Irish Grand National and the Irish Derby
- The Nations Cup at the Dublin Horse Show

Under the 2009 Act the Minister is obliged to review the list of designated events every three years. The purpose of the review is to consider the appropriateness of the current list of designated events and to examine the potential requirements to add any additional events of major importance to society. Following a public consultation the Minister is currently considering the matter.

There are only five exclusively national events in the above list: the All-Ireland Senior Inter-County Football and Hurling Finals; Irish Grand National; the Irish Derby; and the Nations Cup at the Dublin Horse Show. The Audiovisual Media Services Directive (2010/13/EU) stipulates that audiovisual media service providers are subject to the regulations in their country of origin only and cannot be subject to regulation in the destination country except in very limited circumstances such as preventing an incitement to hatred. Hence there are limits to what an individual Government can do in terms of imposing restrictions on sponsorship by alcohol companies of these events. Given this limitation, it is difficult to quantify what impact further regulation of sports sponsorship by alcohol companies of major sporting events would have on public health and related costs to the Exchequer.

Sporting organizations have pointed out that a reduction in funding obtained through sponsorship by alcohol companies would have a detrimental impact on their ability to fund grassroots initiatives. One submission indicated that the cost of physical inactivity is estimated at €1.6 billion annually. The direct costs of obesity — in-patient and day-case

costs, out-patient costs, GP costs and drug costs — have been calculated to cost the Exchequer €400m in 2009 (Perry 2012). Some submissions contend that these costs might escalate if sports sponsorship is negatively affected.

4.2 What evidence is available on the impact of a ban or restriction on sports sponsorship by alcohol companies in other countries?

Given the lack of detailed information on impact, it may be worth looking at what other countries have done to alter sports sponsorship to get a sense of what the potential impact of possible changes might be. The World Health Organization reports that nearly a quarter of reporting countries (24.0%, n = 40) have a total or partial ban on beer company sponsorships of sporting events, while 11.4% (n = 19) relied on industry self-regulation, and 64.6% (n = 108) had no regulation (WHO 2014).

4.2.1 France – Loi Evin

In 1991, France passed a law, the *Loi Evin*, in the fight against smoking and alcoholism, the aim of which was to regulate or prohibit advertising of alcoholic and tobacco products. Among its main features are the following:

- No alcohol sponsorship of cultural or sport events is permitted
- Banning alcohol advertising in cinemas and on radio
- No alcohol advertising should be targeted at young people
- Regulating the content of alcohol advertising in print and poster media so that only factual and verifiable statements are permitted, the intention being to limit promotion of alcohol
- Requiring a health warning on all alcohol advertising

The *Loi Evin* has imposed a complete ban on alcohol sponsorship of sporting events in France. The law made it impossible for American brewer Anheuser-Busch to sponsor the 1998 FIFA Football World Cup in France despite heavy lobbying of the French Government. The Japanese company Casio took over as the major sponsor of the tournament. The *Loi*

Evin has placed restrictions on other global events. For example, a Paris court ordered Dutch brewer Heineken to remove all print advertising linked to the 2007 Rugby World Cup tournament that was staged in France.

There has been a 20% decline in alcohol consumption in France since the law came into effect. In 1990, 15.4 litres of pure alcohol were sold per person aged over 15; in 2010 that had fallen to 12.2 litres (higher than Ireland's). But this downward trend began many years previously, as early as 1960 when consumption stood at nearly 25 litres per person over 15. Also it is not clear how much of this fall can be attributed to the *Loi Evin's* provisions on the prohibition on sports sponsorship as opposed to its other components such as the regulation of the content of alcohol advertising.

In addition, a 2011 survey found that the percentage of 15-16 year old French students consuming an alcoholic beverage 20 times or more during the previous 12 months had doubled between 1999-2011, from 12 to 24 per cent (ESPAD 2012).

4.2.2 Norway

In Norway, there is a total ban on the advertising of all alcoholic beverages containing more than 2.5 percent alcohol by volume. The Alcohol Act from 1997 states that any kind of advertising of alcoholic beverages aimed at consumers is forbidden. There are some exceptions, including advertisements in foreign printed publications imported to Norway, trade journals, advertisements for places of sale of alcohol, and light beer under 2.5 percent alcohol.

During the late 1990s this law was challenged substantially by several Norwegian breweries who decided to sponsor sports teams and sports events. Lengthy court proceedings resulted in a win for the brewing industry. However, this was overturned by the Supreme Court, maintaining the ban on all alcohol advertising. These alcohol marketing restrictions include a ban on alcohol logos on the uniforms of visiting sports teams, a policy designed to protect children from alcohol marketing.

In terms of alcohol consumption, Norway has always been, on aggregate, a low consumer of alcohol. In the 1960s, Norwegians consumed about 5 litres of alcohol per person and this now stands at 7.7 litres.

4.2.3 Finland

The Finnish Parliament has agreed to amendments to the Finnish Alcohol Act which will lead to restrictions on the advertising of mild alcoholic beverages. The purpose of these restrictions is to avoid the exposure of children and young people to alcohol advertising.

Advertising of mild alcoholic beverages in public will become prohibited from January 2015. However, advertising will still be permitted in public gatherings and events, as well as in venues permanently used for these purposes, such as indoor ice rinks, hockey matches and music concerts. Advertising will also remain permitted in international traffic between Finland and foreign countries, and in premises for which a license to serve alcohol or a license to alcohol retail trade has been granted. The prohibition on advertising alcohol on television and radio will be extended from 7 a.m. to 10 p.m. (previously the prohibition ended 9 p.m.). Advertising done by lotteries or contests as well as advertising that is based on information that consumers produce or share in social media will be prohibited.

4.2.4 United Kingdom (UK)

Currently, sponsorship of sports by alcohol companies in the UK is regulated by the Portman Group, which is a collective body of the leading alcohol producers in the UK. As part of the code, drinks companies must ensure there is a recognisable commitment to promoting responsible drinking and/or supporting diversionary/ community activities.

It has been claimed that there are several weaknesses in this system of voluntary regulation. With the exception of the pre-vetting of television advertisements, regulatory controls are only applied after an advertisement has been run and a complaint has been made. And in a fragmented media market place, reliance on public complaint is deemed by some to be of

limited effectiveness. Lastly, the code makes no reference to the overall volume of alcohol advertising (BMA 2009).

Notwithstanding these criticisms, the UK Government's Alcohol Strategy (2012) is mainly focused on the phenomenon of 'binge drinking' and does not address sports sponsorship as a stand-alone subject (HM Government 2012a). This Strategy accepted that there is 'known to be a link between advertising and people's alcohol consumption, particularly those under the age of 18'. It acknowledged the efforts of other countries like Norway in introducing a complete ban on alcohol advertising and France in introducing a ban on TV advertising. It concluded that the Government had seen no evidence demonstrating that a ban was a proportionate response. The Strategy went on to say that 'existing controls have the ability to address the problems associated with advertising alcohol' and that Government would work with the industry to raise awareness amongst the public of the controls and complaint mechanisms available.

In its review of the Government's Alcohol strategy, the House of Commons Health Select Committee (2012) considered that the Government should respond to the increasing health impact of excessive alcohol consumption. In particular, the Committee suggested that the *Loi Evin* merited serious consideration and that a study of the possible public health effects that could be gained by adopting the principles of the *Loi Evin* should be established. The UK Government (HM Government 2012b) responded that the impact of the *Loi Evin* could not be disentangled from other social and legislative changes and that the evidence for its impact on the drinking patterns of those aged under 18 were weak.

4.2.5 South Africa

In South Africa, the established Inter-Ministerial Committee (IMC) reviewed extensive inputs and evidence on alcohol marketing and alcohol-related harm and then mandated the Minister of Health to draft legislation banning all advertising and sponsorships and other marketing on the basis of this evidence.

In September 2013, the South African Cabinet moved forward on its plans to ban alcohol advertising by approving a Control of Marketing of Alcoholic Beverages Bill. This Bill, which

has not yet been released for public comment, is now subject to a regulatory impact assessment (RIA). It reportedly aims to help reduce alcohol-related harm and protect public health through limiting the public's exposure to alcohol marketing by restricting advertising of alcohol products to points of sale, banning sports and arts sponsorships associated with alcohol products, and prohibiting the promotion of alcoholic beverages.

Concerns have been expressed that the proposed RIA might weaken some of the provision relating to restrictions on marketing and advertising (Parry et al. 2014).

4.2.6 Russia

Russia banned alcohol advertisements from stadia and televisions during daylight hours in 2004. In 2005, beer commercials containing images of peoples and animals were banned and in 2009 such commercials were dropped from television and radio altogether. In 2013, a ban prohibiting alcohol advertising on television, radio, the Internet, public transport and billboards, as well as in stadiums and within 100 meters of sports facilities was introduced. However in 2014, the Russian parliament approved a proposal to suspend the ban on beer commercials during official sporting events and this bill will be effective until 2019. It is generally agreed that this suspension has been introduced to facilitate the Football World Cup taking place in Russia in 2018.

4.2.7 Assessment of Restrictions in Other Countries

The experience from other countries does not offer unambiguous evidence about the impact of restrictions on sports sponsorship. France's *Loi Evin* is perhaps the most commonly cited example for such a move but it is worth remembering that it encompasses a broader range of measures beyond a prohibition on sports sponsorship. And even though this law has coincided with a drop in overall alcohol consumption, this fall began well before the law was introduced and the law has not prevented a rise in young students' alcohol consumption. The UK Government does not consider that the evidence is strong enough to warrant introduction of such a law in their jurisdiction. Norway's restrictions are directed

more at advertising rather than sponsorship and its overall consumption levels have increased slightly. Even though Finland is imposing restrictions on the advertising of mild alcoholic beverages, it is still permitting sponsorship of sports events. South Africa is still considering whether to impose a ban on alcohol companies sponsoring sports events and the Russian parliament has temporarily repealed the ban that it had imposed.

5. Value of Alcohol sponsorship to sporting organizations

5.1 What evidence is available on the financial value of alcohol sponsorship to sporting organizations? Can this be broken down across different sports and types of activity?

Many of the submissions have referred to a figure of €25-30m, although a report for the Drinks Industry Group of Ireland in 2011 estimated that the value of sports sponsorship was €35m and this was regarded as a conservative figure (Foley 2011). This latter figure would seem to include not only the major sporting events referred to in the introduction but also smaller scale national events such as a beer company sponsoring the Salthill Devon national five a side soccer festival. It also includes a range of smaller supports including individual pub sponsorship of local teams and events (ibid). The Vintners Federation of Ireland (VFI) has claimed that 49% of its members sponsor local sports teams at an average investment of €1,726 per member in those local activities annually. The overall spend of VFI members is approximately €3.5 million.

In its submission, the Federation of Irish Sport stated that the value of alcohol sponsorship is largely invested in the three largest field sport organisations (the GAA, FAI and IRFU). The value of such sponsorship for the Irish Rugby Football Union (IRFU) at national, provincial and club levels is estimated to be approximately €9m. The Football Association of Ireland (FAI) has stated that their overall commercial revenues amount to €6m, comprised in large part from alcohol sponsorship. For the Gaelic Athletics Association (GAA), overall commercial revenues for 2013 were €17m of which alcohol sponsorship is one component.

In 2012, total commercial race sponsorship was €3.7 million. Of this, the drinks industry provided €375,500 or 10.2%, which was the fifth highest sectoral share behind media, bookmakers and betting exchanges, stud farms, and racecourses.

5.2 What impact would the loss of this funding have on the sports sector/organizations/ events/international events?

The major sporting organisations which presented submissions considered that the loss of the funding obtained through sports sponsorship would have a detrimental impact on their capacity to offer development programmes for young people as well as having negative repercussions on local clubs. The IRFU claims that the potential for Irish teams, at both provincial and national levels, to remain internationally competitive would be hindered by restrictions on alcohol sponsorship.

Both the FAI and the IRFU have expressed concerns that any additional restrictions could jeopardise their chances of participating in international tournaments and stymie the economic benefits expected from increased tourism thanks to these kinds of events. In 2020, Dublin will host part of a major football championship - *Euro 2020* - for the first time after the bid to stage three group games and one from the round of 16 was successful. And the IRFU are currently in contention to host the *Rugby World Cup 2023* and has noted that restrictions on alcohol sponsorship of events would put them at a commercial and competitive disadvantage to their fellow bidders.

However there are equally strong views that the restrictions on sports sponsorship might not necessarily harm sports organisations. The *Loi Evin* has not hindered the soccer and rugby World Cups taking place in France. An argument put forward in some submissions is that despite the ban in France, the country successfully hosted the Football World Cup in 1998 and the Rugby World Cup in 2007 and will be hosting the Euro 2016 UEFA Football Championships. Therefore, these submissions assert that the ban is not necessarily a red-line factor in determining host countries for big sporting events. Whether that applies equally to a small country like Ireland is not clear.

5.3 What evidence is available on alternative sources of sponsorship for the sports sector?

There were conflicting views on this issue raised by interested parties. Some submissions claimed that alcohol sponsorship could be gradually replaced by revenue from other

commercial companies. It has been estimated that global revenues from sports sponsorship will rise from US€35bn in 2010 to US€45.3bn in 2015 (PWC 2011) and some submissions seem to be suggesting that sporting organisations could take advantage of a phased ban to gain alternative sponsorship from this growing market. But one submission made the point that the domestic market for sponsorship is expected to fall at a rate of 1.5% in 2014 which is below forecasts for global growth in sports sponsorship (see Onside Sponsorship 2014). It was also stated that even if alternative sponsors could be found, these organisations would not be likely to pay the premium price that alcohol sponsors do so that there would be a drop-off in revenue accruing from sponsorship.

The example of Australia has been cited where a tobacco sponsorship ban came into effect in 1996. Four years later, total sponsorship revenue doubled from AU€350m to AU€700m although 2000 was the year of the Sydney Olympics so a boost in sponsorship would be expected. In 2013, it has been reported that total revenue accruing from sports sponsorship in Australia amounted to AU€735m (Sponsorship Today 2013).

Domestically, the example of the GAA in securing sponsorship unrelated to alcohol companies has been cited as an example of what can be done to find alternative sponsors. However, sporting organisations are adamant that they would find it extremely difficult to find alternative sources of sponsorship and have cited various events, such as the Irish Masters Snooker Championship and the Irish Open Golf Championship, which have recently experienced difficulties in securing sponsorship.

5.4 What other funding supports could be used to help sporting organisations instead of sponsorship?

An example cited in several submissions was the Australian Government's readiness to replace alcohol sponsorship with state funding. In 2010-11, the Australian Government committed AU\$25m over four years for a Community Sponsorship Fund that provides an alternative to alcohol sponsorship for community sporting and cultural organisations

The Community Sponsorship Fund has four objectives:

- reduce the exposure of young people and children to alcohol imagery and branding
- reduce the links between alcohol and sporting and cultural activities that young people are often involved in, and to provide support for community-based organisations to educate their members about responsible drinking
- provide support for community-based organisations to provide alcohol-free environments for minors
- reduce harmful consumption of alcohol through appropriate responsible service of alcohol provisions at sporting and cultural events.

A total of 16 different sporting organisations are involved with sports such as basketball, soccer and swimming. Some of the most popular team sports in Australia in terms of drawing spectators such as Australian football, rugby league and cricket are not involved with some suggesting since the Government's sponsorship is time-limited, there is no certainty for those sports now supported under Community Sponsorship Fund. In addition, doubt has been cast on whether the Australian Government would be able to match the funding offered by commercial companies. The Australian Football League signed a ten year deal with Carlton and United Breweries in 2012 which was believed to be worth at least AU\$50 million (Jolly 2013)

Other suggestions were that revenue from alcohol taxes should be given to sporting organisations as financial support and as a substitute for having an alcohol sponsor. This would obviously leave a gap in the Exchequer finances that would need to be filled or services in another sphere would have to be cut. Another argument for an alternative was that a government-managed 'blind-fund' could be established so that sponsorship money could be funnelled by Government to sporting organisations without being linked to a particular commercial company. A question arises whether commercial organisations would offer finances if they would not get any identifiable linkage in return.

Another suggestion was that the tax relief scheme available on donations to sports bodies should be modified. Tax relief is available on donations to specified sports bodies for the funding of capital projects. The Commission on Taxation 2009 recommended that the tax relief should also apply for donations to sports bodies and aggregate limits should apply but this would also represent a cost for the Exchequer.

One of the most notable examples of philanthropic donations is the Australian Sports Foundation (ASF), established in 1986, to assist in the development of sport by providing tax deductibility for incorporated, non-profit organisations that registered and undertook fundraising to develop sports related projects. Since 1986, grants totalling in excess of AU\$220 million have been made to Australian sport through the ASF.

In donating to the ASF, donors may nominate a registered project as their preferred beneficiary. Donors can use the ASF's charitable status to claim tax relief on any donation of AU\$2 or more. In a review of the ASF's operation, it has been argued that donors are put off by uncertainty, unsure their gifts will reach their intended destination. Analysis also suggested that the ASF is being used primarily by wealthier sporting clubs and needs to be reworked so that it is also able to support less wealthy sporting organisations (Jolly 2013).

It is difficult to state with any certainty whether philanthropic donations, along the lines of the Australian model, could replace alcohol sponsorship. One study of this subject in Ireland concluded that 'at this stage, given the lack of information regarding philanthropic donations to sport in Ireland, it is not possible to estimate the potential for return on investment in sport' (Millar and Caskay 2013).

Given this lack of information, it is not possible to definitively answer one of the Group's terms of reference, namely the question of considering alternative source of funding for sporting organisations to replace potential lost revenue arising from regulation of sports sponsorship by alcohol companies. Of course, if the economic recovery is sustained and impacts positively on availability of sponsorship funding across different sectors, this would increase alternative commercial sources of revenue.

6. Options for Regulation which fall short of a Ban

Before considering what options there are for regulation of sports sponsorship, it may be worthwhile to consider what has been established so far.

Section 3 found that while it is possible, in theory, to separate sports sponsorship and more general marketing campaigns, in practice it is much more difficult to do so. Given that it is so hard to distinguish between them, it is obviously challenging to assess the specific impact of sports sponsorship on its own.

However, there is a greater consensus from the research literature regarding the effects of exposure to alcohol marketing which is associated with alcohol consumption. The WHO (2014: 75) summarised that ‘numerous longitudinal studies have found that young people who are exposed to alcohol marketing are more likely to start drinking, or if already drinking, to drink more’. The alcohol companies dispute that marketing leads to increased levels of alcohol consumption, claiming instead that marketing acts a brand differentiator between different products.

Section 4 examined the possible impact of further regulation of alcohol sponsorship of sport. It noted that the terms of reference of the Working Group concern a very specific issue, namely the regulation of sponsorship by alcohol companies of **major sporting events** in Ireland rather than sponsorship in general. These are few in number relative to the number of sporting events held every year in Ireland. And several of these major sporting events have commercial arrangements that are decided upon outside of Ireland. It is also the case that changes might have an impact, which cannot yet be quantified, on indigenous industries and associated tourist activity. In light of this, it is difficult to quantify what impact further regulation of sports sponsorship by alcohol companies would have on public health and related costs to the Exchequer.

Section 4 also analysed what other countries have done in terms of placing restrictions on sports sponsorship. Although there are notable examples of countries imposing significant restrictions on sports sponsorship, such as France’s *Loi Evin*, it is difficult to draw clear conclusions.

Section 5 looked at the value of alcohol sponsorship to sporting organisations and found that it was in the region of €25-30m per annum. Sporting organisations consider that the loss of this funding would have a detrimental impact on their ability to nurture sports at local level as well as on the likelihood of attracting major sporting events to Ireland. Other

submissions pointed to the success of organisations such as the GAA broadening its sponsorship base as an example of what could be done.

Section 5 also examined whether other sources of funding could support sporting organisations in lieu of alcohol sponsorship. The possibility of state subvention was underlined, as in Australia, but it was noted that the Australian Government scheme does not encompass the most popular team sports. Philanthropic funding is also possible but it has not been possible to estimate the potential return.

In summary, while there is substantial evidence that alcohol marketing has an impact on drinking patterns of young people, it is difficult to discern what effect sponsorship *per se* might have on public health. And this uncertainty is magnified when it is underlined that the sponsorship delineated in the Group's Terms of Reference pertains only to major sporting events. Also, it is important to note that an increasing amount of alcohol promotion takes place online which a simple ban on alcohol sponsorship on major sporting events will not address.

Given the fundamental level of uncertainty surrounding the impact of alcohol sponsorship, what might be the effects of a ban and the potential difficulties in finding alternative sources of funding, further regulation which falls short of a ban may be an appropriate option.

Before considering what moves might be taken, it is important to appreciate that alcohol sponsorship of sports events is currently regulated in Ireland through a voluntary code, the *Alcohol Marketing, Communications and Sponsorship Codes of Practice*, established in 2004. The Code is monitored by the Alcohol Marketing Communications Monitoring Body (AMCMB) which was established to oversee the implementation of and adherence to the voluntary codes of practice on placement and sponsorship to limit the exposure of young people to alcohol advertising. The AMCMB comprises five people plus an independent chair.

The Voluntary Code has the following provisions in relation to the sponsorship of sports events:

- All sponsored events must have an adult audience profile of 75% or greater, both in terms of attendance at the event and broadcast and or viewer/listenership.

- Alcohol brands companies may not sponsor any sports competitions which are designated specifically for participants under 18 years of age or where their audience (attending or viewing via broadcast) has a profile of less than 75% of adults.
- Temporary signage, advertising the event, is to be sited responsibly. Temporary advertising in the venue only to be placed in agreement with the promoter/sponsored party. All temporary advertising materials around the venue, posters, directional signs etc. should be removed within three working days, after the event.
- In stadia with a capacity of more than 10,000 people, permanent, branded alcohol-advertising signage should constitute no more than 25% of all the advertising space available at any given time.

It is proposed to place this voluntary code on a statutory basis in the proposed Public Health (Alcohol) Bill.

In considering what additional options might be considered, it is worth examining at what are thought to be features of successful regulatory schemes. Three features of successful systems have been emphasized: volume restrictions; content restrictions and an effective system of regulation (de Bruijn *et al.* 2010). Each of these elements is detailed below.

6.1 Volume Restrictions

Imposing volume restrictions on the marketing of alcohol are expected to decrease the total volume of alcohol advertisements to which young people are exposed, and are consequently expected to decrease the total alcohol consumption of adolescents.

Volume restrictions are successful if two conditions hold: (1) the bans proposed are not merely symbolic but contribute substantially to the total volume of alcohol advertising to which adolescents are exposed; and (2) no significant substitution effects arise such as price drops which can stimulate alcohol consumption or marketing shifts to other media.

Examples of volume restrictions in Europe include the comprehensive ban of all alcohol marketing practices like in Norway; restricting the marketing of certain types of alcoholic beverages like the prohibition of wine and spirits advertising in Poland; and restricting marketing in certain media such as banning alcohol marketing on television, radio and cinema in France; restricting the times at which alcohol advertisements may be broadcast as in Italy; and restricting the placement of alcohol advertisement in venue where adolescents in the audience exceeds certain levels.

In terms of this last example, current practice in Ireland is that all sponsored events must have an adult audience profile of 75% or greater, both in terms of attendance at the event and broadcast and or viewer/listenership. In other words, the proportion of those under 18 years of age should be 25% or less. The point has been made this may not protect young people against over-exposure since it is not representative of the Irish population as the 5-17 year old age group currently stands at approximately 17%.

6.2 Content Restrictions

Exposure to alcohol marketing perceived by young people as appealing can increase their intention to consume alcohol and can affect the actual drinking behaviour of youngsters. Therefore, limiting exposure to attractive advertisements, i.e. adjusting their content, can be an important alcohol marketing restriction. The enforcement of content restrictions may lead to certain problems. For example, if all elements that are appealing to young people should be banned, what if these elements are also attractive to adults? To overcome this consideration, some countries insist that enforcement should only allow alcohol advertisements that solely contain product information as in France.

Content restrictions in France and Sweden differ from most other content restrictions by stating which elements are allowed to be used in alcohol advertisements instead of what is not permitted. In media in which alcohol advertising is allowed, only product information can be shown. Alcohol advertisers in these countries are no longer allowed to include elements that have found to be attractive to young people. Instead of describing what cannot be shown in an alcohol advertisement, the French 'code of public health' stipulates

what is allowed: “The authorized advertising for alcoholic beverages is limited to the indication of the degree of alcohol by volume, origin and name of the product, name and address of manufacturer, agents and custodians and the method of production, terms of sale and consumption mode of the product”.

6.3 Effective Systems of Regulation

Some research suggests that while there needs to be enough room for private parties for self and co-regulation, like statutory regulation it needs a clear legislative framework. Furthermore, a self regulatory system needs sufficient incentive to be effective which might include sanctions if various parties do not abide by agreed-upon principles and practices.

Important features of an effective system of regulation are said to include the following:

- Required pre-screening system whereby alcohol advertisements are screened before they are distributed to the public. This is said to increase adherence to existing regulations.
- Effective complaints system (open to public) so that interpretation of any relevant regulations are not left to an ‘inner’ circle.
- Effective sanctions: sanctions that are expected to be most effective are the withdrawal of broadcasting rights and substantial financial penalties. Sanctions that are expected to be less effective are bad publicity or voluntary action.
- System of Monitoring that routinely and systematically monitors the content and volume of alcohol marketing and is independent of commercial interests.

6.4 Implications

A system based on the components detailed above would contain the following features. It would embrace the notion that it is important to decrease the total volume of alcohol advertisements in order to counteract the dose-effect discussed in section 3.4. Research has found that there is an association between elevated levels of exposure to alcohol marketing and increased levels of alcohol consumption. Volume restrictions are designed to

reduce the levels of exposure to alcohol advertising. And content restrictions are designed to impact on advertising that influences expectations and attitudes towards by diminishing its attractiveness. In fact, Government has already committed both of these components and has committed to the following: regulate the marketing and advertising of alcohol to limit the advertising of alcohol on television; limit advertising of alcohol in cinemas to films classified as over 18s; introduce primary legislation to restrict the advertising of alcohol in outdoor media from 2018; regulate advertising of alcohol in print media by way of a statutory code; and prescribe the manner in which alcohol may be portrayed in advertisements. However, research documents that alcohol advertising regulations are only effective if both a strong code/regulation and a well functioning supporting regulatory system are in place.

7. Conclusions

Based on the analysis outlined above, the Group has not been able to reach clear evidence-based conclusions on the actual costs and benefits of further regulation of sponsorship by alcohol companies of major sporting events. Equally the evidence shows that sponsorship is an important component of promotion and marketing activity and it is therefore reasonable for Government to include action on sponsorship among the measure to address alcohol misuse.

In addition, the Group was of the view that the absence of clear data would make any attempt at quantitative modelling the costs and benefits entirely dependent on underlying assumptions adopted, which in turn would be contested and not evidence-based. This conclusion is consistent with previous reviews of this issue.

The Group therefore concluded that the most useful approach would be to identify a range of options which could be taken, and seek to elaborate the likely advantages and disadvantages of each approach, to inform consideration by Government. These options may not of course be mutually exclusive and may facilitate a phased approach which builds on greater evidence accrued over time.

Possible Options

	Options	Advantages	Disadvantages
1	Status Quo (i.e. do nothing beyond existing commitment to put the voluntary code on a statutory basis).	<p>Could be progressed relatively quickly</p> <p>Likely to be supported by industry and some sports organisations</p> <p>Enables joint approach with industry</p> <p>Funding to sports organisations maintained</p>	<p>Would not meet Government policy objective</p> <p>May not adequately target young people</p> <p>Negative reaction to minimal approach</p>
2	Strengthen the existing Code of Practice to embrace stronger volume and content restrictions along with an effective monitoring system.	<p>Enables a refined policy approach</p> <p>Could enable increased controls and clarity in definitions</p> <p>Could provide for licences to sponsor any given sporting events</p> <p>Could facilitate targeting events that attract young people</p> <p>Could make mandatory to provide training in responsible selling, advertising and marketing and selling at sponsored events</p> <p>Industry indicated willingness to strengthen the Code and possibly licensing</p>	<p>Potential difficulties or delay in getting agreement</p> <p>Difficult to estimate the impact in the short to medium term</p>
3	Incorporate Sponsorship	Enables setting minimum	Industry potentially

	<p>within a new Code which captures sports sponsorship alongside other related forms of advertising, promotional activities etc.</p>	<p>standards</p> <p>Recognises interrelatedness of advertising, promotions and sponsorship</p> <p>Enable greater transparency of funding from alcohol companies to sporting organisations.</p> <p>This could include consideration of online marketing which is rapidly growing</p>	<p>reluctant to agree to change</p> <p>New code may take longer to develop and implement</p> <p>Discussions are ongoing at European level to update the Audiovisual Media Services Directive (2010) and so any discussions at national level may be premature</p>
4	<p>Introduce Ban on Sports Sponsorship linked to new stream of Government funding</p>	<p>Would be seen as major signal in addressing alcohol misuse</p> <p>Would reinforce stricter controls on other advertising or promotions</p> <p>Technically a straightforward step</p> <p>Avoid financial impact on sporting organisations</p>	<p>Difficult to justify Exchequer cost based on existing evidence</p> <p>Potential of windfall gains for some organisations</p> <p>Cannot give reliable indication of amount of Government funding required</p> <p>Remove source of marketing advice and expertise to sports organisations</p> <p>Likely to include all sporting events, rather than those that attract young people</p>
5	<p>Set deadline (e.g. 2020/2025) for phasing-out of Sports Sponsorship, allowing time for alternative sources of sponsorship to be developed</p>	<p>Gives sports organisations time to plan for changes</p> <p>Gives time to clarify any likely demand on Government funding</p> <p>Provides time for comprehensive study given</p>	<p>Long timeline in view Government commitment to addressing alcohol related harm.</p> <p>No guarantee that adequate sources of alternative funding could</p>

		the lack of data for Ireland	be developed.
6	Set deadline (eg 2020/2025) for phasing-out of Sports Sponsorship, subject to a formal review in the interim as to availability of alternative funding	Enables staged approach and variation subject to evidence	The required research and assessment may take a long time, and may still be inconclusive
7	Percentage of sponsorship funding to be paid to the Central Fund for substance abuse prevention programmes	<p>Additional source of funding for prevention programmes</p> <p>Would act as incentive to finding alternative sponsors</p> <p>Would help companies meet Corporate Social Responsibility objectives</p>	<p>Would not, on its own, address any negative impacts of promotional activities</p> <p>No incentive for companies to be involved</p> <p>Impact on sports organisations funding</p> <p>It is not clear whether this funding would take the form of a tax, levy or charge and who the collecting agency would be</p>
8	Ban sponsorship by alcohol companies of major sporting events in the forthcoming Public Health Bill.	<p>Would be seen as major signal in addressing alcohol misuse</p> <p>Would enable stricter controls on other advertising or promotions</p> <p>Technically a straightforward step</p>	<p>Crude policy approach to addressing the issues outlined in the Group's terms of reference</p> <p>Difficult to justify based on existing evidence</p> <p>Does not deal with the issue of overseas-based events and sponsorship</p> <p>Removes source of marketing advice and expertise to sports organisations</p> <p>Likely to include all</p>

			sporting events, rather than those that attract young people Removes opportunities to promote Irish products and impact on attraction of sports events to Ireland
--	--	--	--

The table above presents a range of options ranging from maintaining the status quo to banning sponsorship. Some of the options are not mutually exclusive and could be combined.

Appendix 1: Membership of the Working Group on Regulating Sponsorship by Alcohol Companies of Major Sporting Events

Department of the Taoiseach

Department of Health

Department of Transport, Tourism and Sport

Department of Finance

Department of Public Expenditure and Reform

Department of Education and Skills

Department of Social Protection

Department of Agriculture, Food and Marine

Department of Arts, Heritage and the Gaeltacht

Department of Children and Youth Affairs

Appendix 2

Working Group on Regulating Sponsorship by Alcohol Companies of Major Sporting Events

Questions for Consultation

Based on an initial review of available information, the Working Group is inviting evidence-based responses to the questions listed under each issue below.

Impact of sports sponsorship as a standalone marketing tool and as an integral part of other marketing and promotion activities

The majority of research carried out appears to examine the issue of sports sponsorship as part of an integrated marketing communications tool.

The WHO defines marketing as ‘any form of commercial communication or message that is designed to increase, or has the effect of increasing, the recognition, appeal and/or consumption of particular products and services. It could comprise anything that acts to advertise or otherwise promote alcoholic beverages.’²

The Code of Practice for Sponsorship by Alcoholic Drinks Companies defines sponsorship as “A commercial agreement by which a sponsor, for the mutual benefit of the sponsor and sponsored party, contractually provides financing or other support in order to establish an association between the sponsors image, brands or products and a sponsorship property in return for rights to promote this association and/or for the granting of certain agreed direct or indirect benefits”.

- Q1. Is it possible to distinguish clearly between sports sponsorship and other sports-related marketing\advertising activities?**
- Q2. What is the evidence of the specific impact of sponsorship on its own?**

² World Health Organisation (2010) *Global Strategy to Reduce the Harmful Use of Alcohol*

Q3. What evidence is available on the impact of sports sponsorship as part of integrated marketing tool to promote alcohol consumption?

Impact of sports sponsorship on alcohol consumption levels

A range of factors can impact on alcohol consumption, including by young people, such as socio-economic status, peer influences, social norms and social media.

Q4. What evidence is available on the causal relationship between sports sponsorship on alcohol consumption, including by young people?

Alcohol and Public Health

The Government has agreed to tackle alcohol misuse through a package of measures encompassing pricing, marketing and advertising, structural separation, labelling, enforcement powers and, in the case of sports sponsorship, to consider regulating sports sponsorship by alcohol companies.

Q5. What impact would further regulation of the sponsorship of sport by alcohol companies have on public health and related costs to the Exchequer of alcohol misuse?

Q6. What evidence is available on the impact of a ban/restriction on sports sponsorship by alcohol companies in other countries?

Value of alcohol sponsorship to sporting organisations

There seems to be limited information regarding the amount of sponsorship by alcohol companies to sporting organisations which makes it difficult to quantify the potential lost revenue arising from any regulation.

Q7. What evidence is available on the financial value of alcohol sponsorship to sporting organisations? Can this be broken down across different sports and types of activity?

Q8. What impact would the loss of this funding have on the sports sector/organisations/events/international events?

Alternative funding

- Q9. What evidence is available on alternative sources of sponsorship for the sports sector?**
- Q10. What other funding supports could be used to help sporting organisations instead of sponsorship?**

Options for regulation which fall short of a ban

There is already a voluntary Code of Practice for Sponsorship by Alcoholic Drink Companies which the Government has decided should be placed on a statutory footing.

This raises the question of what alternative options for regulation exist, and what would be the impacts\costs.

- Q11. What further options could be considered for regulating/restricting alcohol sponsorship?**
- Q12. What regulatory models have worked well in other countries?**
- Q13. Are there ways to make the existing voluntary Code of Practice more effective?**

Appendix 3: Consultation Process – List of submissions

Following the Group's call for submissions seeking evidence-based input from interested parties, 19 submissions were received from the following:

1. Alcohol Action Ireland
2. Alcohol Beverage Federation of Ireland (ABFI)
3. Alcohol Health Alliance
4. College of Psychiatrists of Ireland
5. Eurocare
6. European Centre for Monitoring Alcohol Marketing
7. European Sponsorship Association (ESA)
8. Fáilte Ireland
9. Federation of Irish Sport
10. Football Association of Ireland
11. Health Promotion & Improvement, HSE West
12. Horse Racing Ireland
13. HSE
14. Informal Oireachtas Cross Party Group on Alcohol Misuse
15. Irish Cancer Society
16. Irish Rugby Football Union
17. Royal College of Physicians of Ireland
18. Royal Ministry of Health and Care Services, Norway
19. Spunout

Bibliography

Aspara, J. and Tikkanen, H. (2013) *A Methodological Critique of Alcohol and Addiction Researchers' Studies on the Effect of Advertising on Adolescent Alcohol Consumption*. Available at SSRN: <http://ssrn.com/abstract=2205112>

British Medical Association [BMA] (2009) *Under the Influence: The Damaging Effect of Alcohol Marketing on Young People*. London: BMA House.

Bruijn, A. (2012) 'Exposure to online alcohol advertising and adolescents' binge drinking: A cross-sectional study in four European countries', in Anderson, P., Braddick, F. and A. Gual (eds.) *Alcohol Policy in Europe: Evidence from Amphora*. Barcelona: The Amphora Project.

de Bruijn, A., Johansen, I. And A. van den Broeck (2010) *Effective Alcohol Marketing Regulations: A proposed framework to evaluate existing alcohol marketing regulations*. Utrecht: Dutch institute for alcohol policy

de Bruijn, A., Tanghe, J., Beccaria F., Bujalski, M., Celata, C., Gosselt, J., Schreckenber, D. and L. Slowdonik (2012) *Report on the impact of European alcohol marketing exposure on youth alcohol expectancies and youth drinking*. Alcohol Measures for Public Health Research Alliance (AMPHORA).

Collins, R. L., Ellickson, P. L., McCaffrey, D., & Hambarsoomians, K. (2007). Early adolescent exposure to alcohol advertising and its relationship to underage drinking. *Journal of Adolescent Health*, 40(6): 527-534.

Davies, F. (2009) 'An investigation into the effects of sporting involvement and alcohol sponsorship on underage drinking', *International Journal of Sports Marketing and Sponsorship* 11 (1): 25-45.

European Health and Alcohol Forum (2009) 'Does marketing communication impact on the volume and patterns of consumption of alcoholic beverages, especially by young people? - a review of longitudinal studies'. Available at http://ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/docs/science_o01_en.pdf

European School Survey Project on Alcohol and Other Drugs [ESPAD] (2011) *The 2011 ESPAD Report: Substance Use Among Students in 36 European Countries*. Stockholm: The Swedish Council for Information on Alcohol and Other Drugs. Available at

[http://www.espad.org/Uploads/ESPAD_reports/2011/The 2011 ESPAD Report FULL 2012_10_29.pdf](http://www.espad.org/Uploads/ESPAD_reports/2011/The_2011_ESPAD_Report_FULL_2012_10_29.pdf)

Foley, A. (2011) *The Contribution of the drinks industry to tourism, festivals and sport*. Drinks Industry Group of Ireland.

Gordon, R., Harris, F., Marie Mackintosh, A., & Moodie, C. (2011). Assessing the cumulative impact of alcohol marketing on young people's drinking: Cross-sectional data findings. *Addiction Research & Theory*, 19(1), 66-75.

HM Government (2012a) *The Government's Alcohol Strategy*. CM 8336. London: Stationery Office.

HM Government (2012b) *Government Response to the House of Commons Health Select Committee Report of Session 2012-13: Government's Alcohol Strategy CM 8439*. London: Stationery Office.

House of Commons Health Committee (2012) *Government's Alcohol Strategy HC 132*. London: Stationery Office.

Jolly, R. (2012) *Sports Funding: Federal Balancing Act*. Canberra: Parliament of Australia.

Jones, S and C. Magee (2011) 'Exposure to alcohol advertising and alcohol consumption among Australian adolescents', *Alcohol and Alcoholism*, 46 (5), 630-637.

Miller, R. and Caskey, P. (2013) *Funding Irish Sport: Can Philanthropy Play a Role?* Federation of Irish Sport. Available at

<http://www.2into3.com/fileupload/Sports%20and%20Philanthropy%202into3%202013.pdf>

O'Brien, K. (2014) Alcohol industry sponsorship and hazardous drinking in UK university sport. Alcohol Research UK. Available at

http://alcoholresearchuk.org/downloads/finalReports/FinalReport_0112.pdf

O'Brien, K., & Kypri, K. (2008). Alcohol industry sponsorship and hazardous drinking among sportspeople. *Addiction*, 103(12): 1961-1966.

Onside Sponsorship (2014) *Onside Irish Sponsorship Industry Survey 2014*. Dublin.

Parry, C., London L., and Myers, B., (2014) 'Delays in South Africa's plans to ban alcohol advertising', *The Lancet*, vol. 383, issue 9933: 1972.

Perry, J. (2012) *The Cost of Overweight and Obesity on the Island of Ireland*. Cork: Safefood Ireland.

Pettigrew, S., Rosenberg, M., Ferguson, R., Houghton, S., & Wood, L. (2013) 'Game on: do children absorb sports sponsorship messages?' *Public Health Nutrition* 16 (12): 2197-2204. Cambridge: Cambridge University Press.

Price Waterhouse Coopers (2010) *Back on track? The outlook for the global sports market to 2013*.

Price Waterhouse Coopers (2011) *Changing the Game: Outlook for the Global Sports Market to 2015*.

Reiser, M., Breuer, C., and P. Wicker (2012) 'The Sponsorship Effect: Do Sport Sponsorship Announcements Impact the Firm Value of Sponsoring Firms?' *International Journal of Sport Finance*, 7: 232-248.

Sponsorship Today (2013) *Australia & New Zealand sponsorship data analysis report*. IMR Publications.

Wakefield, K and R, Rivers (2012) 'The Effect of Fan Passion and Official League Sponsorship on Brand Metrics: A Longitudinal Study of Official NFL Sponsors and ROO'. Available at <http://www.sloansportsconference.com/wpcontent/uploads/2012/02/Wakefield-and-Rivers-jan13-final.pdf>

World Health Organization (2014) *Global Status Report on Alcohol and Health 2014*. Geneva. World Health Organization.