

Alcohol Advertising Review Board

Determination Report

Reference number: 799/19
Product: Little Fat Lamb Fantasy
Advertiser: United Distillers

The complaint is **upheld**.

2 October 2019

This determination by the Alcohol Advertising Review Board Panel (“the Panel”) concerns an advertisement for Little Fat Lamb Fantasy by United Distillers which was the subject of a complaint received on 4 September 2019.

The Advertisement

The complaint was in relation to the product packaging of Little Fat Lamb Fantasy.

The product label featured a rainbow coloured background with white clouds underneath. The Little Fat Lamb label was in the middle with the words ‘BREWED’ and ‘ALCOHOLIC’ underneath it. Along the bottom of the label was the text ‘Fantasy’ in rainbow colours. Smaller black font underneath stated ‘WITH NATURAL GUARANA’. To the left was the text ‘8% VOL ALC’. At the top was an image of a sheep with wings and a unicorn horn. To the right of the sheep was the text ‘1.25 LITRE’. Text across the top stated ‘WARNING ALCOHOLIC BEVERAGE CONTAINS 8% ALC VOL’.

The Complaint

The complainant believes the advertisement contravenes the Code. The complainant stated:

“The product’s packaging is likely to appeal strongly to minors because:

- (a) it uses imagery, designs and cartoon characters that are likely to appeal strongly to minors; and
- (b) it could easily be confused with a soft drink.

This new product in the Little Fat Lamb range produced by United Distillers uses imagery, designs and cartoon characters that are tropes of children’s products. The marketing concept combines the themes of rainbows, unicorns and fantasy. The bright, rainbow coloured exterior labelling will be bright and visually appealing to young people. The rainbow colour scheme, PET bottle and cartoon character mean that it could easily be confused with a non-alcoholic product. Images of this product are included below.

There are international precedents holding that unicorn packaging may have a special appeal to children. A recent complaint decision about ‘Unicorn Tears Gin Liqueur’ in the UK stated that

while “the product communicated its alcoholic nature with absolute clarity” and “such imagery could hold a broad appeal for all age groups” the “overall impression conveyed by the product, including the unicorn logo and childlike typeface... did have a particular appeal to under-18s” and therefore upheld the complaint. This is a highly analogous matter.

- <http://www.portmangroup.org.uk/complaints/complaint-decisions/complaint-decision-details/2019/04/16/unicorn-tears-raspberry-gin-liqueur>
- <http://www.portmangroup.org.uk/complaints/complaint-decisions/complaint-decision-details/2019/04/16/unicorn-tears-gin-liqueur>
- <http://www.portmangroup.org.uk/complaints/complaint-decisions/complaint-decision-details/2019/04/16/unicorn-tears-raspberry-gin-liqueur-miniature>

Further, with the addition of guarana in this latest version of Little Fat Lamb, the product is even more likely to appeal to the youth market. The word guarana appears to be in larger font than the word alcoholic, and combined with the labelling could easily be confused with an energy drink.”

The Code

The advertisement was reviewed against the Code, and in particular:

Section (5)(1) of the Content Code:

5. Standards to be applied to the naming and packaging of Alcoholic Beverages

Without limiting the application of the other provisions in this Code, labels, graphics, artwork, brand names, packaging, containers and other marketing materials and techniques shall not:

1. have an appearance of special appeal to Young People by way of designs, motifs, cartoon characters or other devices that predominantly appeal to Young People;
2. lead to confusion with confectionary or soft drinks.

The Advertiser’s Comments

The Advertiser was contacted for comment on 6 September 2019. No response was received.

Panel’s determination

The complaint was referred to three Panel members for review. The Panel determined:

1. The advertisement contravened section (5)(1) of the Content Code, on the basis that the Panel believed the brightly coloured rainbow label, imagery of the unicorn, and the use of ‘Fantasy’ as the brand name would attract and have special appeal to young people.
2. The advertisement contravened section (5)(2) of the Content Code, on the basis that the majority of the Panel believed the product packaging would lead to confusion with soft drinks. One Panel member commented that the words ‘brewed’, ‘alcoholic’, and ‘8% vol alc’, and the warning message, makes it clear that the product is not a soft drink. However, the majority of the Panel believed that it is more likely than not to be confused with a soft drink due to the

shape and material of the container, the unicorn artwork and colourful rainbow graphics, and the promotion of guarana in the beverage.

The complaint is **upheld**.

Further action

The Alcohol Advertising Review Board requests the Advertiser amend the product packaging in line with the Panel's concerns.