

8 April 2014

Ms Fiona Jolly  
CEO  
Advertising Standards Bureau  
Level 2  
97 Northbourne Avenue  
TURNER ACT 2612

Dear Ms Jolly,

I write in relation to the current DrinkWise Australia campaign, 'Drinking – Do It Properly'. I believe this campaign breaches various provisions of the Alcohol Beverages Advertising (and Packaging) Code (ABAC) and Australian Association of National Advertisers (AANA) Code of Ethics. We give permission for the McCusker Centre for Action on Alcohol and Youth to be named as the complainant.

#### **Description and placement of the advertisement**

DrinkWise Australia is a group established and funded by the alcohol industry, governed by a Board that includes six senior industry representatives. The 'Drinking – Do It Properly' campaign is represented as targeting 18 – 24 year olds and to be "*designed to influence young adults to drink responsibly – by moderating the intensity and frequency of binge drinking occasions*".<sup>1</sup> The campaign uses social media, a dedicated website ([www.howtodrinkproperly.com](http://www.howtodrinkproperly.com)), on-premise activations, and selected outdoor media.<sup>1</sup> Campaign advertisements have been seen on public buses and in cinemas.

The industry website Mumbrella notes that the campaign: "*features a Don Draper type character who talks about 'drinking properly' and encouraging people distancing themselves from 'amateurs' and to 'remember everyone has their limit'.*"<sup>2</sup> The website features a YouTube video called 'How to Drink Properly' and provides links to 'Drinking – Do it Properly' Instagram, Twitter, Facebook, and YouTube accounts.

While the campaign may not be for a specific alcohol product, we consider that the videos both look like and are advertisements for alcohol products and promote alcohol consumption. On that basis, we believe the campaign should be reviewed against the ABAC Code and AANA Code of Ethics.

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<sup>1</sup> <http://www.drinkwise.org.au/our-work/young-adults-18-24/>

<sup>2</sup> <http://mumbrella.com.au/drinkwise-australia-classy-drinking-clemenger-binge-drinking-209591>

Below we have listed sections of the codes we believe the campaign advertisements breach and a brief rationale for our concerns; however, these should be taken as examples only.

### **Section (a)(iii) and (a)(iv): ABAC Code**

The ABAC Code states in section (a) that advertisements for alcohol beverages must “*present a mature, balanced and responsible approach to the consumption of alcohol*”; subsections iii) and iv) state that advertisements accordingly “*must not promote offensive behaviour, or the excessive consumption, misuse or abuse of alcohol beverages*” and “*must only depict the responsible and moderate consumption of alcohol beverages*”.

We believe that the ‘Drinking – Do It Properly’ campaign promotes and encourages alcohol consumption. The overall tone of the campaign is light and humorous, and it presents alcohol consumption as the ‘cool’ thing to do. The use of cartoon characters, inappropriate language, references to alcohol overconsumption, and the tagline ‘Drinking – Do It Properly’ all work to encourage drinking.

Several videos from the ‘Drinking – Do it Properly’ campaign do not present a mature, balanced and responsible approach to the consumption of alcohol. The ‘How to Drink Properly’ video (<http://www.youtube.com/watch?v=WBnoXi4-8WY>), available to view on the ‘Drinking – Do it Properly’ website, Facebook page, and YouTube account, even appears to promote excessive consumption of alcohol. The use of the character ‘Jim’, who is described as an “*amateur*” drinker and having reached his limit “*a few scotches*” ago, is depicted drooling, waving his arms around with little control over his body, and driving a tank through a brick wall. Another character is described as being “*shitfaced*” while drowning in a toilet.

The ‘Mother’ video uploaded onto the ‘How to Drink Properly’ Facebook and YouTube pages, (<http://www.youtube.com/watch?v=BJnSZzJD1c4>), features a character sitting on a chair, drooling and rolling his head around; while ‘Mind Your Reputation’ (<http://www.youtube.com/watch?v=ob9tdrazWgM>) opens on an image of a face vomiting and depicts several characters in socially unacceptable situations as a result of excessive alcohol consumption.

### **Section (c)(i): ABAC Code**

The ABAC Code states in section (c)(i) that advertisements for alcohol beverages must “*not suggest that the consumption or presence of alcohol beverages may create or contribute to a significant change in mood or environment and, accordingly – must not depict the consumption or presence of alcohol beverages as a cause of or contributing to the achievement of personal, business, social, sporting, sexual, or other success*”. The ‘Drinking – Do It Properly’ campaign suggests that the consumption of alcohol beverages contributes to both positive and negative changes in mood.

A voiceover during the ‘How to Drink Properly’ video states “*You should be aware of your own limits ... you’ll notice when drinking you’ll feel very, very attractive, for a time. This is what we call the realm of drinking excellence*”. The accompanying graphic depicts an average man with facial stubble and untidy hair. At the words “*very, very attractive*”, the man becomes well groomed and women who appear to be swooning are seen on either side of him. The voiceover and images indicate that the consumption of alcohol contributes to a significant

positive change in mood, and imply that the consumption of alcohol will contribute to the achievement of social success.

The above is followed by the statement: *“However this is followed by an equal and opposite reaction, a downward spiral. At this point the drinker becomes very unattractive or as it is known in common parts, shitfaced”*. The graphics at the end of this statement show a hand reaching out of a toilet. This specifically represents alcohol contributing to a significant negative change in mood.

An image uploaded to the ‘Drink Properly’ Instagram and Twitter pages on 17 March 2014 depicts a character leaning back with what appears to be drool coming out of his mouth. A mother figure is handing him a tissue. The caption states *“First rule of drinking: your friends should never have to mother you. I made a classy as fuck YouTube video about it: <http://youtube.com/user/drinkproperly>”*. This image is an example of further online content of the campaign suggesting a significant change in mood and environment due to excessive consumption of alcohol.

### **Section (d)(i): ABAC Code**

The ABAC Code states in section (d)(i) that advertisements for alcohol beverages must *“not depict any direct association between the consumption of alcohol beverages, other than low alcohol beverages, and the operation of a motor vehicle, boat or aircraft or the engagement of any sport (including swimming and water sports) or potentially hazardous activity and, accordingly – any depiction of the consumption of alcohol beverages in connection with the above activities must not be represented as having taken place before or during engagement of the activity in question and must in all cases portray safe practices”*.

A voiceover during the ‘How to Drink Properly’ video states *“Remember, everyone has their limit. Jim here reached his a few scotches ago, which is why he finds it difficult to operate heavy machinery”*. This is accompanied by a male character, Jim, driving a tank through a brick wall. The advertisement explicitly states that Jim is under the influence of alcohol while operating heavy machinery and the advertisement does not portray safe practices when operating a vehicle.

### **Section (g): ABAC Code**

The ABAC Code states in section (g) that alcohol advertisements must *“not encourage consumption that is in excess of, or inconsistent with the Australian Alcohol Guidelines issued by the NHMRC.”*

As noted in several examples above, the ‘Drinking – Do It Properly’ campaign promotes immoderate consumption of alcohol, and encourages consumption that is inconsistent with the Australian Alcohol Guidelines issued by the NHMRC. The NHMRC Guidelines recommend drinking no more than two standard drinks on any day to reduce the lifetime risk of harm from alcohol-related disease or injury; and no more than four standard drinks on a single occasion to reduce the risk of alcohol-related injury arising from that occasion. The use of the word “shit-faced” in connection with alcohol, and displaying images of young people clearly intoxicated and portraying signs of alcohol overconsumption such as vomiting clearly encourages consumption inconsistent with this guideline. While the campaign discusses ‘limits’ and ‘drinking properly’, no reference is made to the NHMRC Guidelines.

## Section 2.5: AANA Code of Ethics

Section 2.5 of the AANA Code of Ethics states: *“Advertising or Marketing Communications shall only use language which is appropriate in the circumstances (including appropriate for the relevant audience and medium). Strong or obscene language shall be avoided.”* Obscene language is used repeatedly and unnecessarily in the ‘Drinking – Do It Properly’ campaign. Several examples include:

- The homepage of the ‘How to Drink Properly’ website states *“Warning, it’s classy as fuck.”*
- A voiceover in the ‘How to Drink Properly’ video available to view on the website, YouTube, and Facebook page states *“... or as it is known in common parts, shitfaced.”*
- An image uploaded on to the ‘How to Drink Properly’ Facebook page (<https://www.facebook.com/drinkproperly>) has the caption *“Vessel choice is of upmost importance. Drinking cask wine is fine, but do it from a glass ... never straight from the cask. More classy as fuck drinking tips on Instagram...”*.
- An image uploaded onto the ‘How to Drink Properly’ Twitter page (<https://twitter.com/drinkproperly>) states: *“Well hello there Jux and Thaddeus, Yes, “fucking frank” is a term I’d use too, along with “excellent” and “classiest thing on the internet”.”*
- An image uploaded onto the ‘How to Drink Properly’ Instagram page (<http://instagram.com/drinkproperly>) in March 2014 states *“FUCK OFF”*.

This language is inappropriate, offensive, and unnecessary, even in the context of an online campaign targeted at 18 – 24 year olds.

## Section 2.6: AANA Code of Ethics

Section 2.6 of the AANA Code of Ethics states: *“Advertising or Marketing Communications shall not depict material contrary to Prevailing Community Standards on health and safety.”*

The ‘Drinking – Do It Properly’ campaign depicts material contrary to community standards on health and safety in social media and online aspects of the campaign, including:

- Immoderate and excessive consumption of alcohol, and discussing unhealthy effects of overconsumption such as hangovers and vomiting; and
- A heavily intoxicated person driving a tank.

## Action

It is particularly concerning that this advertisement is being distributed online, with Facebook page visitors encouraged to further ‘share’ and distribute the advertisement virally among their networks. The only age barrier for the online component of the campaign appears to be on the Facebook page. You will be aware that children and young people can easily access the website, YouTube, and Instagram accounts.

The outdoor media component of the campaign is also of concern, as alcohol advertising on public transport, including buses and trains, is highly visible to those driving and walking past as well as those using public transport. Children and young people can be expected to be heavily exposed to public transport advertising.

Given the importance of protecting young people from exposure to alcohol promotion, we urge you to act as speedily as possible to ensure that this campaign is withdrawn.

Yours sincerely,

Professor Mike Daube AO  
Director, McCusker Centre for Action on Alcohol and Youth