



Division of Advertising Practices, Bureau of Consumer Protection,
Federal Trade Commission, 600 Pennsylvania Avenue, NW., NJ-3212,
Washington, DC United States

November 23, 2006

Greetings,

The Association to Reduce Alcohol Promotion in Ontario (ARAPO) is a provincial network in Ontario, Canada concerned about the influence of alcohol promotion on society's attitudes and choices surrounding alcohol use. The Association is committed to raising awareness about the impact of alcohol advertising, through supporting effective policy development, education, and community action.

We commend you on undertaking such an ambitious and thoughtful consultation process on the current state of alcohol promotion in your country. We believe that the public would be better served if there were more restrictions and regulations on alcohol promotion.

In Canada, we share similarities in that the alcohol promotion is also regulated through industry self-regulation. We understand that your consultation process is primarily with stakeholders in United States; however, we hope that a Canadian perspective might be of some assistance.

Research has shown over the years that alcohol is the most commonly used substance among Canadian youth. Alcohol consumption and heavy episodic drinking by youth is associated with psychological issues, physical injury, unplanned and unprotected sex, violent crime, and suicide. Over half of the students who frequently binge drink experience five or more alcohol related problems a year. The cumulative influence of alcohol advertising creates an environment that shapes young people's perceptions of alcohol and drinking norms. There is growing evidence to show that the more aware, familiar and appreciative young people are of alcohol promotion the more likely they are to drink both now and in the future.

In Canada, provincial and federal guidelines exist to control alcohol promotion on television, print, and radio. Before June 1995, the Canadian government, through the Canadian Radio-television Telecommunications Commission (CRTC), held mandatory pre-clearance of alcohol advertisements. In 1997, the CRTC disbanded mandatory pre-clearance of alcohol advertisements. Since then, efforts to control alcohol advertisements have been left to the provinces, broadcasters, and the industry themselves on a voluntary basis.

Even with provincial guidelines in place, there are a number of limitations that compromise effectiveness:

- The guidelines offered for alcohol advertisers to follow are vague and open to variable interpretation that may allow advertising that is attractive to underage youth.
- The regulation only helps to control traditional media, and does not control alcohol promotion that includes: sponsorships, product placement in films and stores, school and campus regulations, viral marketing, and the Internet.
- An after-the-fact complaint system is unable to prevent the impact of irresponsible promotion.

Additionally, inter-provincial and global differences create gaps and loopholes that make enforcement of the regulation difficult, especially since alcohol promotion is not isolated within each province. As a result, alcohol advertising is an important issue to address when developing strategies to reduce the health problems associated with alcohol consumption.

ARAPO believes that in order to create a culture of low-risk drinking, rather than excessive drinking among youth, the influence of alcohol promotion needs to be considered given the growing body of literature that suggests a link between alcohol promotion and youth consumption. In addressing the impact of alcohol promotion, various interventions will need to be incorporated.



1. Use effective alcohol promotion control policies

In general, improvements of current alcohol promotion policies along with consideration of more effective alcohol promotion policies are needed. Utilization of more effective alcohol promotion policies may include:

- Implementing proven effective policies and monitoring compliance.
- Providing appropriate funds for government agencies to produce industry and statistical reports to support informed policies.
- Facilitating public awareness of industry advertising practices thereby promoting industry accountability, both through market pressure on companies and, if necessary, through regulatory intervention.
- Expanding beyond traditional media (i.e., television, radio, print) to cover alcohol marketing in its broadest sense (i.e., Internet, on-site promotions, specialty promotions, etc.) and international advertisements.

2. Increase counter-alcohol promotion messages

There are three main types of social responsibility messaging that could be used to help counter messaging in alcohol advertisements: health warning labels/signs, Public Service Announcements (PSAs), and alcohol advertising media literacy. These types of communication do not control the alcohol advertisement message per se, but rather counteract the pro-alcohol messaging by increasing the public's awareness of the potential harmful effects of alcohol-use.

3. Increase research efforts examining the impact of alcohol advertising on public health and safety and effective strategies to control alcohol promotion

The gaps in research make it difficult to assure alcohol promotion is effectively regulated and controlled in Canada, as well as internationally.

If there is any further assistance or support that we can provide please do not hesitate to contact us.

Sincerely,

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ARAPO is a project at the Ontario Public Health Association (OPHA), which is a voluntary, charitable association that provides leadership on issues affecting the public's health and strengthens the impact of people who are active in public and community health throughout Ontario.

CC: The Honourable Jim Watson, Minister of Health Promotion, Government of Ontario