



Alistair Taylor

The Portman Group



# Portman Group Codes ensure responsible alcohol marketing



**Portman Group has regulated alcohol marketing since 1996**

Applies to all producers



**82%** of complaints upheld



**Tough sanctions for breaking the rules**

Products can be removed from shelves

Irresponsible products named & shamed



**150+** products removed from the market



**Free advice and training to help companies market responsibly**

Confidential, expert advice and accredited training



**600+** advice requests per year      **1600+** people trained



**Industry-wide support for the codes of practice**

**140** code signatories

Widespread support from producers, wholesalers and retailers



**£0 cost** to the taxpayer

# Remit



## MARKETING

1. **Names**
2. **Labels**
3. **Packaging**
4. Promotions
5. Editorial content of websites
6. Sponsorship & more



## PAID FOR ADVERTISING

1. TV, press and radio
2. **Social media** and online
3. Cinema
4. Outdoor
5. Direct mail
7. Advertorials  
(under producer control  
and paid for) & more



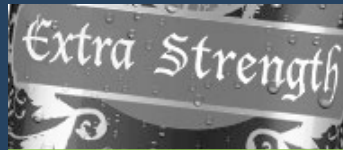
## FOOD INFORMATION REGULATIONS 2013

1. ABV
2. Legal name of product
3. Volume
4. Allergy Information & more

# The Alcohol Marketing Code



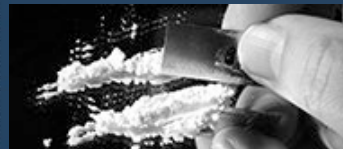
Alcoholic Content



Strength



Anti-social Behaviour



Illicit Drugs



Sexual Success



Popularity



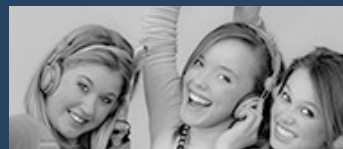
Irresponsible Drinking



Rapid Drinking



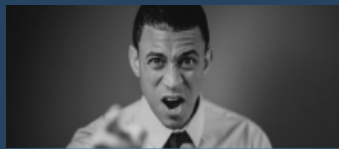
Appeal to under 18s



Under 25s



Therapeutic Properties



Offence

There are twelve rules which apply to alcohol marketing.

- Spirit *as well as* the letter
- Direct and indirect claims
- Code sets the minimum standards

The 6<sup>th</sup> edition was launched on 4<sup>th</sup> March 2019. After a 6 month period of grace, to allow producers to bring their products in line with the new Code, it will come into full force in September 2019.

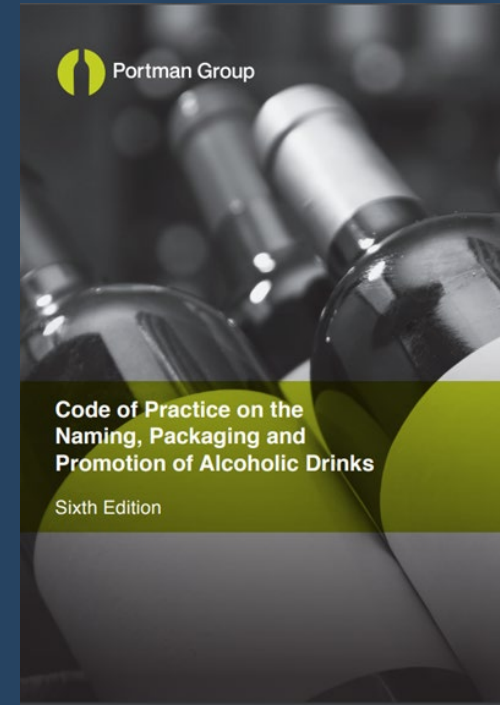
# Key rules

## Is it clearly alcoholic?

- **Rule 3.1** The alcoholic nature of a drink should be communicated on its packaging with absolute clarity.

## Particular appeal to under-18s?

- **Rule 3.2(h)** A drink, its packaging and any promotional material should not in any direct or indirect way have a particular appeal to under-18s







# Case study:

## Three Pugs Bubblegum Gin Liqueur

### Complaint

*"I think the pink liquid and label with the cartoon pictures of the pugs on is too appealing to children".*

### Question

- Is it clearly alcoholic?
- Does it have particular appeal to under-18s?

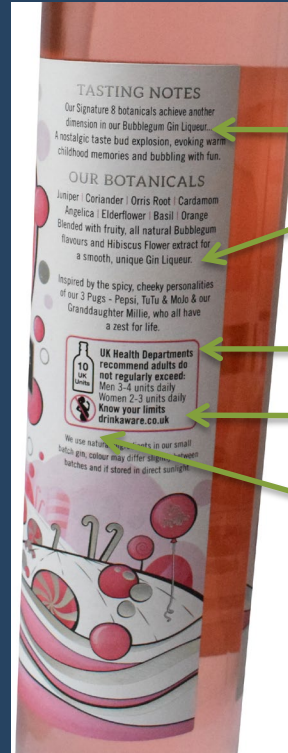
# Three Pugs Bubblegum Gin Liqueur

Gin or soft  
drink?

Traditional  
alcohol bottle  
shape

Clear  
reference to  
gin liqueur

ABV



Decision:

Under code paragraph 3.1

**COMPLAINT NOT UPHOLD**

References to gin liqueur

Unit content

Responsible drinking  
messaging

Pregnancy warning

# Three Pugs Bubblegum Gin Liqueur

Particular appeal to under-18s?

Pink liquid

Hot air balloon

Pugalicious

Pugs

Willy Wonka-style sweet land



Reference to 'evoking warm childhood memories'

## ICP Ruling

- Each element not necessarily problematic in isolation but ...
- Anthropomorphic pugs + in a hot air balloon + Willy Wonka style sweet land + reference to childhood + pink background

## Decision:

Under code paragraph 3.2(h)  
**COMPLAINT UPHELD**



# Case study: Unicorn Tears Gin Liqueur

Gin or soft drink?

Traditional alcohol bottle shape →

Clear reference to gin liqueur →

ABV →



← Cork stopper

## Complaint

*"The attached gin liqueur beverages are on sale in John Lewis at Home (Newbury). The images appeal to children and they are on a low display stand – i.e. at child level. I believe they are in breach of the code"*

← CMO guidelines

← Responsible drinking message

← Pregnancy warning

← Unit content

**Decision:**

Under code paragraph 3.1

**COMPLAINT NOT UPHELD**

# Case study: Unicorn Tears Gin Liqueur

## Particular appeal to under-18s?

Unicorns have broad appeal

Black line drawing similar to children's drawing

Black uneven typeface



**Decision:**

Under code paragraph 3.2(h)

**COMPLAINT UPHELD**

**Therapeutic effect?**

ICP considered the claim on the back label:

*'to unleash their magical powers: swirl the bottle, behold its shimmering majesty' and 'consume the mythical spirit' & 'please enjoy the magic responsibly'*

**Decision:**

Under code paragraph 3.2(j)

**COMPLAINT UPHELD**

# Alcoholic Content - Recommendations

- Include the ABV
- Include alcohol descriptors such as gin, vodka, etc
- Does the bottle or can help tell the consumer it is alcoholic?
- Some busy designs **may** need to work harder

# Under 18s



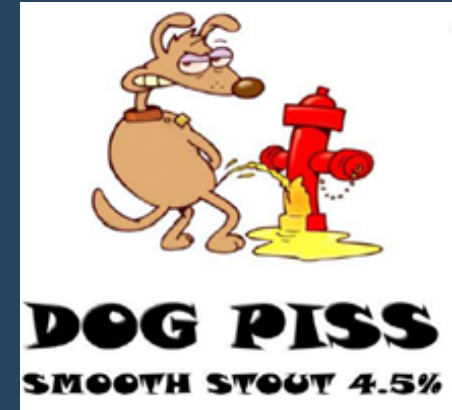
Images or references  
to children's culture



Childish images



Childish names



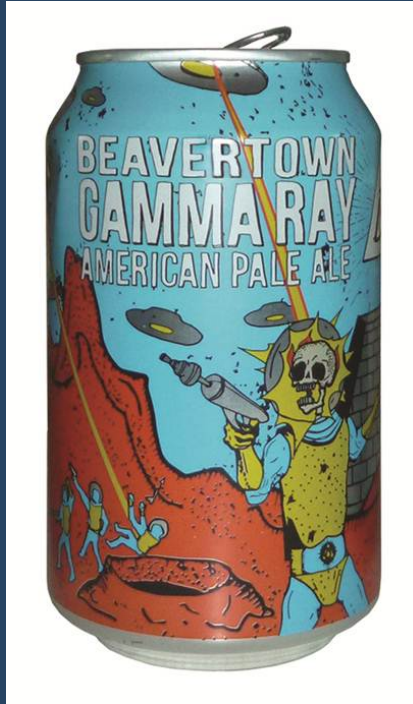
Toilet humour



# Not all illustrations are problematic



Dark, adult, graphic  
novel illustrations



Retro,  
nostalgic illustrations



## Appeal to under 18s

Rule 3.2 (h) A drink, its packaging or promotion should not have a particular appeal to under-18s.

Care should be taken when using nostalgia based products as these could still have an inadvertent appeal to under-18s



# Advisory Service – what we offer

We offer advice to the UK drinks industry to ensure organisations act and stay within the Code of Practice.

- **Free**
- **48 hour**
- **Confidential**

We also offer a free Code training service to help producers and agencies understand the Code.

Contact us:

[advice@portmangroup.org.uk](mailto:advice@portmangroup.org.uk)

020 7290 1460

# Thank you

**Please keep in touch:**

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