2009 Report

Compliance monitoring for spirits advertising run by digital media

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Abbreviations

EASA European Advertising Standards Alliance
SRO Self-Regulatory Organisation
EFRD European Forum for Responsible Drinking
RDM Responsible drinking message

This exercise was sponsored by

EFRD
EUROPEAN FORUM FOR RESPONSIBLE DRINKING

October 2009
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ALLIANCE
EUROPEAN ADVERTISING STANDARDS
EUROPEENNE POUR L'ETHIQUE EN PUBLICITE

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For the first time, EASA has been commissioned to conduct a pilot monitoring exercise entirely focused on digital marketing communications. Following the adoption of the EASA Digital Marketing Communications Best Practice in October 2008, the EASA Self-Regulatory (SR) Committee agreed to conduct reviews of advertiser-owned websites.

The monitoring exercise was designed as a methodology trial and a learning exercise for both SR practitioners and the sponsor of the exercise, EFRD.

13 countries, widely covering the EU and representing different levels of SR practice have been selected to participate in the review:
1. Belgium (JEP)
2. Czech Rep. (RPR)
3. Germany (ZAW)
4. Greece (SEE)
5. Hungary (ORT)
6. Italy (IAP)
7. Ireland (ASAI)
8. Netherlands (SRC)
9. Poland (RR)
10. Portugal (ICAP)[1]
11. Spain (Autocontrol)
12. Sweden (Ro.)
13. UK (ASA)

The review's methodology has been designed around two complementary phases:
1) A review of spirits pop-ups and banners captured by the Xtreme Information database.
2) A review of spirits advertiser owned-websites at random. SROs were asked to review a sample of 15 websites for small countries, to 40 websites, if available, for larger ones. On average, each SRO reviewed 30 websites.

The results of the reviews needed to be delivered in the last quarter of 2009.
1) Xtreme Information informed EASA that although October, November and December were still the highest months in creative volume, the end of the second quarter came second. Therefore, the capture of ads on the Xtreme database covered the months of May, June and July 2009.
2) The website review has been conducted over the summer 2009.

The following texts and codes were used as the basis of the SRO reviews:
a. The EFRD Common Standards
b. The EFRD internet guidelines[2]

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[1] For either economical or cultural reasons (Portugal being a country with little national production of spirits), the exercise has shown that Portugal is a country where there are little to no spirits' websites with the extension ".pt" or in the national language. Only six national marketer-owned websites were identified, which was considered to be not enough to deduct national compliance percentages.

[2] EFRD issued its "Guidelines for Commercial Communication on the Internet, for Digital Media and Mobile Marketing Media" in January 2009. Through these, the EFRD members explicitly committed to apply the EFRD Common Standards to all media platforms, and adopted a set of additional technical safeguards. An implementation phase was put in place until June 2009.

      c.   Relevant national advertising standards codes and specific sectoral codes
      d.   Relevant national advertising laws

For reasons of impartiality and due process, independent reviewers, knowledgeable in both digital media, youth and consumer protection issues, have been appointed to perform the following functions:

- Verify that the appropriate criteria have been set up;
- Check that due process is observed throughout;
- Verify the EASA report that is created from the monitoring results for release and testify to the correctness of the monitoring procedure and the scoreboard.

Notes From the independent reviewers

In 2009, three independent reviewers participated in the monitoring exercise:

Jack Law – ALCOHOL FOCUS SCOTLAND: Alcohol Focus Scotland (AFS) is the only Scottish charity dedicated to raising awareness of, and reducing the significant health and social harm caused by, alcohol. Their long term aim is to achieve a culture change in Scotland where far fewer lives are affected by alcohol misuse, and moderate, responsible drinking is the norm. AFS will achieve this by providing accurate information to the public and professionals, training people to recognise and help people overcome alcohol problems, influencing government and policy, and working in partnership with other organisations on specific projects.

Arnaud Houdmond – GENERATION EUROPE: Generation Europe and its Foundation operates a two-way communication platform enabling exchanges of views between young people, the private and public sectors. Generation Europe is experienced in providing educational information material covering a wide range of issues in 24 languages through a variety of media. Their aim is to engage tomorrow's decision-makers, today. Generation Europe's National Ambassadors are Generation Europe's local eyes and ears on the ground. As bridging points, National Ambassadors are there to inform of what GE is doing on a European level and inform us of what is happening locally.

Albert Recasens – CONFIANZA ONLINE: CONFIANZA ONLINE is a self-regulatory system created as a comprehensive project with the aim of uniting the wills of the greatest number of professional associations dedicated to the implementation, promotion and defense of the development of advertising and commerce in the new media. It covers both commercial communications and contractual issues arising from commercial transactions between companies and consumers through Internet and other electronic and interactive media. Since the protection of personal data is an area in need of adequate safeguards, it also falls within the regulatory scope of CONFIANZA ONLINE. On the other hand, CONFIANZA ONLINE also focuses on the protection of children and adolescents, as well as in issues such as accessibility, usability and security.

Jack Law – Alcohol Focus Scotland

Alcohol Focus Scotland has once again been invited to comment on the monitoring report compiled by the EFRD, this occasion on the application of their standards in digital media communications. Reviewers have been asked to;

• Verify that the appropriate criteria have been set up.

• Check that due process is observed throughout.

• Verify the EASA report that is created from the monitoring results for release and testify to the correctness of the monitoring procedure and the scoreboard

These comments have been prepared from the draft report dated September/October 2009 which suggests it still could be updated. However, on the basis of what has been submitted, we wish to submit the following comments.

The guidelines for members on internet, digital and mobile marketing are a useful beginning to what is an extremely challenging area in which to introduce effective regulation. In so far as the monitoring exercise is concerned it appears to be consistent with the provisions laid down in the guidelines. In other words, the monitoring exercise has enabled a report to be produced which meets the criteria. That being said we would suggest that there is room for some improvement in the guidelines which comes to light through the monitoring process.

The review of adverts indicates that 'of the 75 visuals captured during the period reviewed, none were found content wise in breach of the codes'. However, more than half (49) did not carry a responsible drinking message (RDM). Interpretation of the code could be confusing in that it has a two tier 'obligation' in this respect. In countries where such a message is mandatory under a national advertising code adverts **should** carry such a message and it could be interpreted that where there is no geographical requirement, this aspect of the code could be superseded by national conditions. This could explain why 28 did not feature the RDM. Arguably in an increasingly globalised context, this could be seen as an 'escape clause' for some businesses which although members of EFRD have decided not to include an RDM. Surely if the businesses have agreed to the desirability of an RDM then this should be applied irrespective of the localised context, and would demonstrate a consistent commitment to spreading such a message.

While it is heartening to see that only 7% of the websites reviewed had one or more problematic items shown. The similarities between the outcome of previous studies in other media platforms and this study would suggest that there is a clear issue in respect of marketing which is about content rather than the medium used, and that perhaps more awareness is needed at the design stage of the guidelines.

There are no other issues with the report of which AFS is aware.

Jack Law
Alcohol Focus Scotland
23rd October, 2009

Arnaud Houdmont – Generation Europe

Generation Europe Foundation (GE) is happy to review, for the second year in a row, the report on advertisements for alcoholic beverages carried out by the European Advertising Standards Alliance, the European Forum for Responsible Drinking and the self-regulatory organisations.

Besides an expertise in consumer protection issues, Generation Europe Foundation brings another important element to the table: the youth perspective. As principal users of new media, the GE community members are representative

of youth. In addition to their status as potential consumers, youth also form the most important target group for digital marketing… For this reason our GE Ambassador in Poland, Marcin Senderski (representing his peers from the Generation Europe community), and myself are very grateful to be given a platform to address these issues.

Last year, in reviewing the 2008 report on Alcohol Advertising Monitoring, we mentioned the need for future monitoring exercises involving young people, especially in terms of new media and online advertising on social networks, blogs and websites.

It is with appreciation then, that this year I learned that the focus of the monitoring exercise was to be new media – the online world is still a new playing field for advertisers that are targeting youth. It is the first time that the monitoring of alcohol advertising focuses entirely on digital marketing and it is really interesting to compare this year's results with findings from the monitoring of alcohol advertising in more mainstream media from previous years.

Perhaps the most interesting comparison to be made is a slightly surprising one in the sense that even on the internet alcohol advertisers are by and large abiding by self-imposed rules. Whereas the internet is often seen as the Wild West with very limited regulation, the advertisers are applying the same standards of self-regulation as they do in other media.

The research, however, does not take into account the more indirect forms of advertising such as viral marketing, online social networks and the power of these media to carry and spread messages. The very nature of these marketing techniques obviously makes it very hard to monitor their reach and success. More often than not it is also very difficult to pinpoint the source of the viral advertisement. By definition these types of messages are self-propagating and self-sustaining… nor are they necessarily actively promoted by advertisers.

A short visit to one of the most popular online social networks of the moment revealed that alcohol brands enjoyed a large following online with, for instance, Martini Bianco has a page with 89.585 fans, Bacardi Breezer has 78.014 and Absolut Vodka commands a staggering 434.993 fans. In order to get a really good idea of the extent of online self-regulation in alcohol advertising, we recommend that these networks be submitted to some degree of scrutiny as well.

Rather characteristic of the alcohol industry is that their online presence – whether it is via websites or through other means – is not meant to directly increase online sales or even to drive traffic to one particular website. Online alcohol advertising merely aims to increase brand awareness amongst internet surfers…

We do understand that the alcohol companies and brands are not always at the origin of the word-of-mouth "campaigns" and that there is very little that can be done to stop consumers themselves from starting pages, websites and blogs dedicated to their favourite brands… This said, it is and remains within the ability of individual companies to protect their brand and prohibit abusive use of their name and logo. Individual young people may also be less inclined to set up these viral marketing tools if all incentives to do so were removed.

Whereas the standards of self-regulation adopted by the different players within the industry are very high, it is with some concern that we learned that the most important and repeated breach of these self-imposed rules was in relation to targeting and appealing to an underage audience. Whereas it is very tempting for any advertiser to target future customers, it is very important for there to be a continued effort to avoid such practices.

In line with Marcin Senderski's point of view – that advertising doesn't necessarily lead to the consumption of alcohol - it is helpful to understand that youth do not need much encouragement to drink or to smoke - or to try anything new for that matter. Different alcohol companies are advertising, not to convince young people to start drinking – they do that just fine by themselves – but rather to convince them that their brand is that much cooler than that of their competitors.

It is also important to remember that it is not only the alcohol industry that is to be held accountable for their advertising ethics. The media through which companies advertise share the responsibility for the products they choose to advertise, the methods they employ and make available to do so as well as the public they choose to target.

It is often said that the one product that is guaranteed to do well during an economic downturn is alcohol. Both Google and Facebook are definitely paying heed to this adage. They announced last winter, at the worst of the crisis, that they will allow advertisement for spirits.

To a large extent self-regulation in alcohol advertising works. This report shows that even online most advertisers abide by the rules. If - for whatever reason - online platforms such as Google and Facebook decide to employ more liberal tactics this should be welcomed provided that all parties involved continue to impose the existing self-regulation, no matter what the medium of choice is.

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Arnaud Houdmont
Project manager – Generation Europe

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Albert Recasens – CONFIANZA ONLINE

Participar como 'independent reviewer' la primera vez que se confecciona un monitoring de este estilo sobre Digital Media y en concreto el medio Internet es para mi un doble orgullo. Uno por el altísimo nivel ético y profesional de los organizadores del mismo, EASA y EFRD, a los que les doy las gracias por el reconocimiento que me brindan en representación de CONFIANZA ONLINE así como de mi experiencia anterior en la autorregulación europea (en ambos casos AUTOCONTROL ha representado un papel importante por ser socio fundador de CONFIANZA ONLINE así como mi primera experiencia directa con la autorregulación). Segundo, porque nos permite tener acceso y tomar el pulso desde la primera fila del escenario al panorama actual, el real, el de verdad, que se está ofreciendo a los usuarios online desde algunas de las acciones de comunicación de la industria del alcohol en diferentes países europeos. En concreto han sido 13 países participantes en los que se han revisado un total de 440 piezas entre webs, banners y pop-ups. Pero todavía es mayor motivo de satisfacción el estudiar detenidamente los resultados finales. Veamos: nos encontramos antes dos agentes (por un lado la industria del alcohol y por otro el medio Internet) que han sido siempre un foco de especial atención por parte de los gobiernos, asociaciones y consumidores. Observar con más detalle como se interrelacionan estos dos partes, por otra parte necesitadas la una de la otra (una ofreciendo contenidos, otra el canal de información) es algo más que oportuno, yo diría que es muy necesario, y más si es la propia

I am really proud to have been an independent reviewer in a monitoring exercise that for the first time ever concentrates on Digital Media, and even more so because of its focus on the Internet. I am proud to have collaborated in this project firstly because of the high ethical and professional standards of those who organised this monitoring exercise: EASA and EFRD; I would like to thank them for their trust in me as a representative of CONFIANZA ONLINE and in my previous experience in European self-regulation (in both cases AUTOCONTROL was a huge influence as it had a leading role in founding CONFIANZA ONLINE and represented my first direct experience with self-regulation).. Secondly, this monitoring exercise allows us to directly access and experience the digital panorama of marketing communications as conceived and offered by the alcohol industry to online consumers in different European countries. In concrete numbers, the 13 countries included in this monitoring exercise have reviewed a total of 440 visuals on websites, banners and pop-ups.

It is very satisfying to analyse the final results. The alcohol industry and the Internet have always been in the spotlight of governments, associations and consumers. Therefore, it is opportune and necessary to observe in detail how the marketing communications of the alcohol industry and the Internet as a medium that runs alcohol marketing communications interact. Each depends on the other, one offering the content and the other being the media. This analysis becomes even more relevant as it is the industry itself (in this case the spirits industry) that is showcasing that it cares about checking whether the legal and self-regulatory standards that should be applied to any marketing communication are applied to their marketing communications run by digital media.

industria (en este caso de bebidas espirituosas) la que demuestra una especial sensibilidad por ver si se respetan las normativas, legales y deontológicas, que deberían aplicarse en la comunicación comercial en los nuevos medios digitales.

Y los resultados, aunque hemos de ser prudentes por tratarse de un ejercicio inicial tipo test, son esperanzadores y me atrevería a decir, teniendo en cuenta la prudencia anterior, muy positivos. El nivel de cumplimiento general con las norma aplicables es de un 94%, nivel extraordinariamente alto si lo comparamos con otros monitorings anteriores en los que los resultados, a pesar de tratarse de comunicación en medios tradicionales y por tanto muchísimo más restringidos y vigilados, como la propia TV, era del 95-96%. ¿Qué quiere esto decir? Por un lado, que los organismos de autorregulación están cumpliendo su función en los respectivos países, ya que son los encargados en la mayoría de los casos de aplicar los códigos de la industria. El segundo punto a resaltar es que los compromisos son por supuesto del mismo nivel independientemente del medio al que se dirigen, y por tanto también permiten desmontar la creencia de que Internet es un campo en el que las empresas relajan algo más su control sobre los contenidos publicitarios.

Pero también es cierto que queda mucho trabajo por hacer, y hay campos que sin duda deberán ser mejorados, no tanto en cuanto a los anteriormente mencionados contenidos de las acciones de comunicación (que responden a la misma problemática de todos los medios, es decir, éxito social, consumo excesivo, incitación a menores…) sino en aquellas áreas específicas del medio digital, como por ejemplo el de evitar el acceso online de los menores de edad. Actualmente los medios técnicos para evitarlo son los que son, pero estoy seguro que con la ayuda también de las administraciones públicas, encontraremos nuevos sistemas de evitarlo (por ejemplo, el desarrollo de firmas digitales o sistemas alternativos de identificación social). Otra área, no cubierta de momento en este informe y que deberemos entre todos encontrar la forma de enfocarla es la referente a las comunidades sociales online y plataformas 2.0, en la que sin duda la privacidad de datos y acceso a las mismas representa ya un gran reto

Despite the fact that we need to be cautious since this type of monitoring is still a test, the results are encouraging and really positive. The level of general compliance according to the applicable standards is of 94%, an extraordinary high level, especially if compared to previous compliance monitoring projects, which looked at spirits marketing communications run by traditional media, like television (therefore subject to greater restrictions and control), which resulted in a 95-96% compliance rate.

What does that mean? On the one hand, it means that self-regulatory organisations are dong their jobs in implementing the codes put in place by the advertising industry. On the other hand, it means that the compliance level is the same independently of the media that runs the ads; therefore, we can dismiss the belief that advertisers relax their standards when it comes to advertising on Internet.

However, it is also true that much work remains to be done and there is certainly room for improvements in specific areas related to spirits' advertising independent of the media that runs it. In particular, issues such as social success, excessive consumption, and appeal to minors need to be addressed. When it comes to issues related especially with digital marketing communications, more attention needs to be turned to, for example, the online access of minors to alcohol advertising. Currently, the technical tools to control the access of minors are limited, but I am sure that with the help of public administrations, we will find new systems to address this problem (for example through the development of digital signatures or alternative systems of social identification). Another area, not addressed in the present report and which we will have to take into consideration for the future, is the one of social networks and web 2.0 platforms. The issues of data privacy and access to these platforms are a challenge for the industry and will remain so for the coming years. I am convinced that this pilot project will create the basis to explore this issue further, as well as other areas, so that the advertising industry can continue to maintain the high commitment shown so far through legal compliance, advertising self-regulation and ethical conduct in marketing communication activities.

Albert Recasens
Director General of CONFIANZA ONLINE

para la industria y lo seguirá siendo en los próximos años. Estoy convencido que este proyecto piloto permitirá crear las bases para profundizar en esta y otras áreas para seguir manteniendo el alto compromiso hasta ahora demostrado en el cumplimiento legal, ético y deontológico en sus actividades de comunicación comercial a través de la autorregulación.

Albert Recasens - Director General - CONFIANZA ONLINE
AGENCIA DE CALIDAD DE INTERNET-IQUA

How does Xtreme capture the pop-ups and banner ads?

Site coverage
Xtreme selects websites for capture based on a number of criteria, including page impressions/site traffic figures, presence of relevant advertising, and client requests. For the purpose of this exercise, a list of websites where companies advertise has been communicated to Xtreme to ensure a wider capture base. Xtreme currently monitors over 1900 websites.

Capture
Xtreme's spidering tool visits selected website home pages between 4 and 12 times per day; a small number of sites are visited up to 100 times per day. The spider opens a number of links from the home page. The links are selected at random, and the number opened varies by site. The spider always "stays on the same path", i.e. stays within the website domain, and does not open links to external web pages. The spider tool captures all images that have a click-through on the web pages that it visits. In addition to the spider tool, a small number of sites are run through a secondary capture application which visits a pre-determined set of web pages and then grabs any resulting ".swf" (Flash) image files from the capture PC's Temporary Internet Files. This process enables the capture of advertising in Flash format that has been displayed on the web page using Javascript.

Advertising formats
The spider picks up various ad formats including banners, buttons, skyscrapers and pop-ups. Xtreme does not measure search advertising. However, Xtreme captures results pages for some popular keyword searches and downloads banners and other advertisements from these results pages. Email campaigns and web sponsorships are not measured by Xtreme's online adex service.

COMPLIANCE RESULTS

During the monitoring period (May, June July 2009), a total of 72 pop-ups and banners have been captured by Xtreme information.

Although Xtreme has a comprehensive gathering tool, the numbers of visuals collected appeared to be low. From this it can be deduced that pop-ups and banners are not tools commonly used by alcohol marketers.

This has been confirmed following the analysis of the results through exchanges with the EFRD secretariat.

Number of pop-ups and banners captured on the Xtreme Database
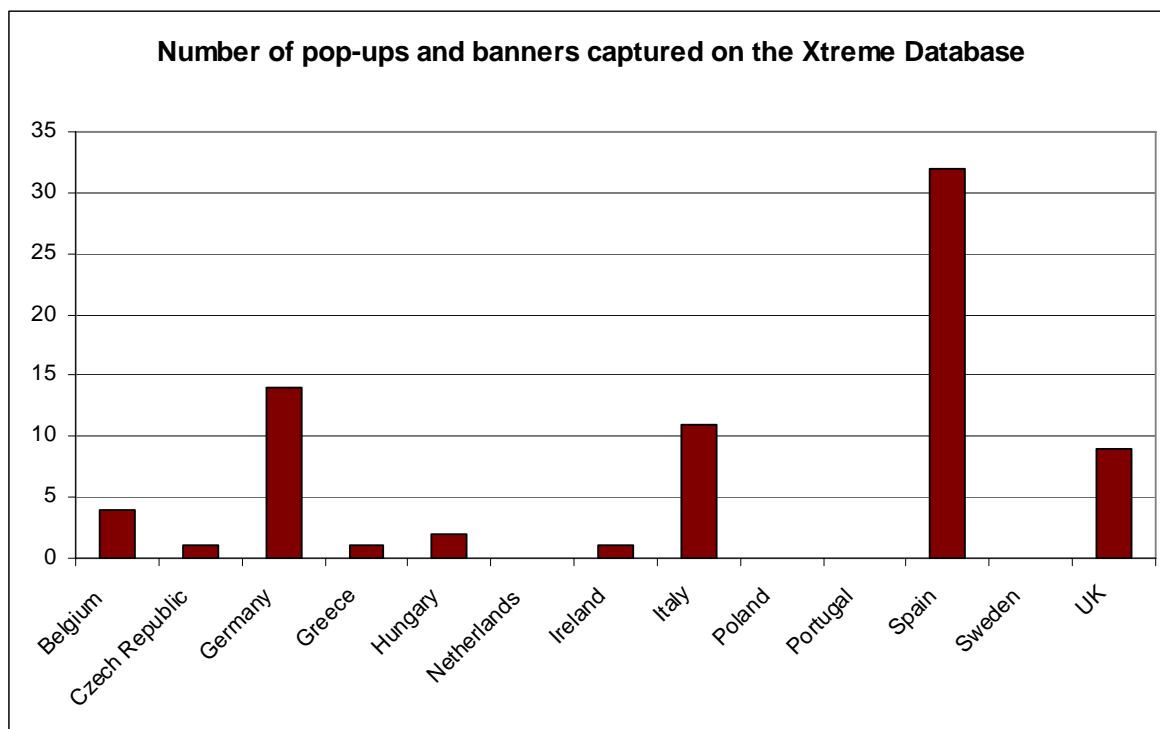
Graph1: Number of pop-up and banner ads captured in the Xtreme database

Country	Total
Belgium	4
Czech Republic	1
Germany	14
Greece	1
Hungary	2
Netherlands	0
Ireland	1
Italy	11
Poland	0
Portugal	0
Spain	32
Sweden	0
UK	9
Total	**75**

Table 1: Number of pop-up and banner ads captured in the Xtreme database

Out of 75 pop-ups and banners captured during the period reviewed, none were found "content wise" in breach of the codes.

Out of the 75 pop-ups and banners captured, 21 did not carry a responsible drinking message when they should have according to the national context. 28 visuals did not mention the Responsible Drinking Message (RDM) but in countries where it is not compulsory and 23 responded to all the necessary requirements.

Pop-ups and banners 2009

Lack of RDM
29%

OK and RDM
32%
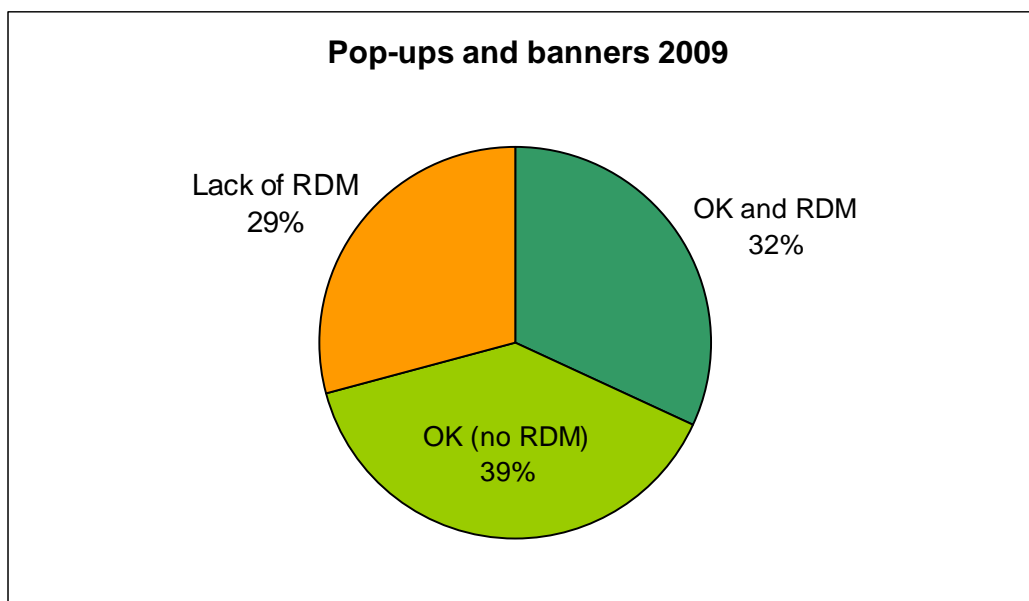
OK (no RDM)
39%

Graph2: Compliance results for pop-up and banner ads captured in the Xtreme database

	N° of ads
OK and RDM	23
OK (no RDM)	28
Lack of RDM (breach of the code)	21
Total	**72**

Table 2: Compliance results for pop-up and banner ads captured in the Xtreme database

PART2: REVIEW OF BRAND WEBSITES

The aim of this exercise was not to declare a website compliant or non-compliant as a whole (as they constantly change and evolve) but rather to flag items of the website that might not be in line with the EFRD common standards and other applicable rules.

International brands: SROs were invited to navigate all national websites of the brands provided on the EFRD companies brand websites list by clicking on the different pages and options proposed (15 to 20 websites per country). SROs were asked to favour national websites (URLs with country denomination ".es", ".nl" etc) or ".com" where by selecting the country of origin, access could be obtained to a dedicated page in the national language.

National/local brands: SROs were asked to complete this review of international brands by looking at national spirits brand websites (where possible, 10 sites per country). The EASA secretariat relied on the SRO knowledge of its national market to identify websites that were not listed on the EFRD companies list (local producers and national brands).

The EASA secretariat suggested that SROs vary their entry points on the site reviewed, and look for potentially problematic areas (promotion, shop, music and concerts, video ads etc...). When reviewing a website, both the content as well as the general "look and feel" needed to be considered.

Results have been communicated to the EASA secretariat through a template Excel sheet reporting form. All reviews have been performed by national SROs. EASA only ensured that the results were reported in a consistent manner.

<div align="center">COMPLIANCE RESULTS</div>

A total of 368 websites were reviewed by the participating SROs[3]. Out of these, 343 were not subject to further remarks. 25 websites had one or more problematic items flagged.
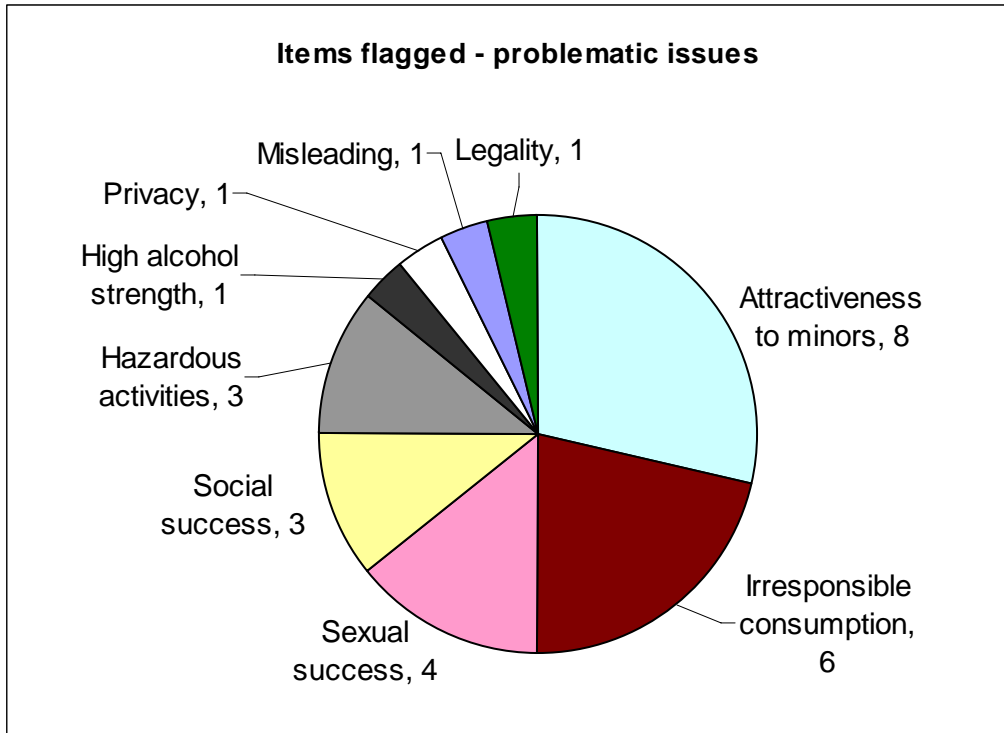
Overall results of website review
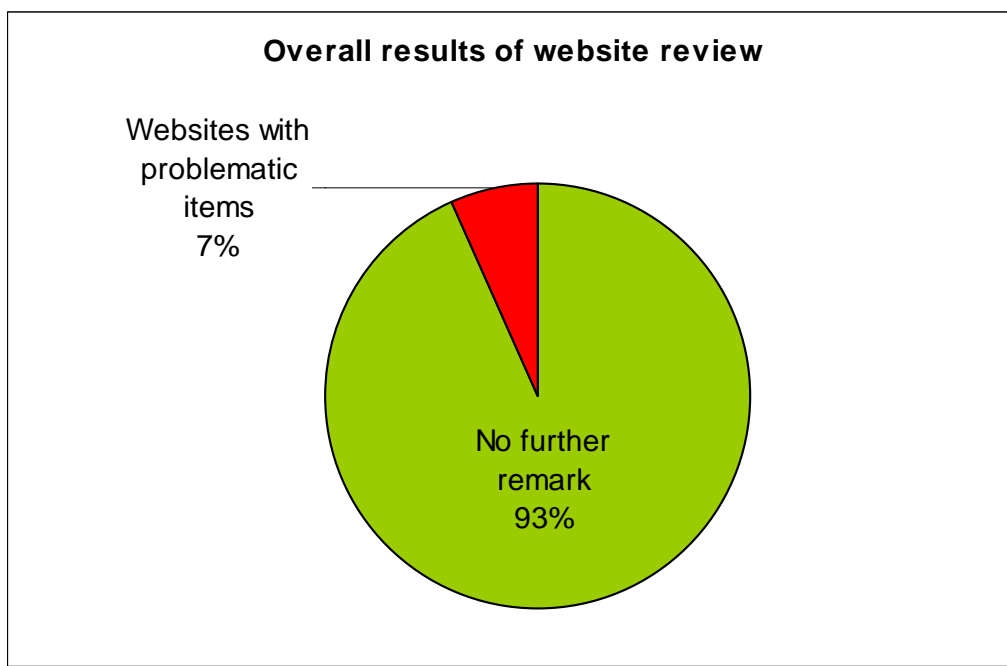
Graph 3: Compliance results for the 2009 website review

Website with no further remark	343
Websites with problematic items	25
Total n° of websites reviewed	**368**

Table 3: Compliance results for the 2009 website review

When looking closely at the type of problematic items reported by the participating SROs, we note an overlap with the results of previous exercises conducted by EASA on alcohol advertising in other media platforms (TV, print). Nevertheless, the small number of breaches flagged in relative terms (25) means that care should be taken when interpreting the "problematic issues". The small number also means that the presentation of results in percentages would be misleading.

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[3] In Portugal, only six spirits' websites were found in the national language. For international brands, consumers were mostly redirected to an English language site, and the number of local producers' websites is very limited. Therefore, due to the small numbers of national websites available, no compliance figures were established for Portugal.

Items flagged - problematic issues

Misleading, 1 Legality, 1

Privacy, 1

High alcohol
strength, 1

Hazardous
activities, 3

Social
success, 3

Sexual
success, 4

Attractiveness
to minors, 8

Irresponsible
consumption,
6

Graph 4: Type of issues flagged on websites

As some websites had more than one problematic item according to the SRO that conducted the review, the number of problematic items flagged exceeds the number of websites reviewed that featured one or more problematic items.

Issues	N° of items
Attractiveness to minors	8
Irresponsible consumption	6
Sexual success	4
Social success	3
Hazardous activities	3
High alcohol strength	1
Privacy	1
Misleading	1
Legality	1
Total	**28**

Table 4: Type of issues flagged on websites

## OVERVIEW OF THE SPECIFIC EFRD COMMITMENTS

EFRD issued its "Guidelines for Commercial Communication on the Internet, for Digital Media and Mobile Marketing Media" in January 2009. Through these, the EFRD members explicitly committed to apply the EFRD Common Standards to all media platforms, and adopted a set of additional technical safeguards to deter underage web users from logging in. An implementation phase was put in place until June 2009.

These additional EFRD requirements have been monitored as part of this project which was conducted over the summer 2009.

- EFRD members will ensure that content and related technologies on brand and product promotion websites and web pages are designed for visitors of legal age only, and safeguarding mechanisms will be put in place with intent to discourage underage access as set forth in item 3 below.

- Landing pages of brand and product promotion websites and web pages from EFRD members will incorporate an **age confirmation check** (birth date, country of consumer access), allowing access only to visitors who are able to confirm a legal age of 18 years old or above.

- EFRD members will add to the age confirmation before getting access to a brand and product promotion website the **address of a dedicated website where visitors can receive information about inappropriate alcohol consumption**.

- Underage visitors designating their age as being under 18 attempting to enter an EFRD members brand and product promotion website shall be directed to dedicated websites that **encourage responsible drinking behavior**. (*Dedicated websites for this guidance means such sites offered by companies or by independent third parties such as Drinkaware, Talkaboutalcohol, Talkboutbooze, Klartext-reden, fryspunkt, to mention but some examples*).

- EFRD members will **include responsible drinking messages in all their digital commercial communications as well as a reference to dedicated responsible drinking websites.** *Responsible Drinking Messages for this guidance mean messages such as "Notre savoir-faire se déguste avec sagesse" ("Taste our know-how wisely"), "À consommer avec modération" ("Consume in moderation"), "Enjoy responsibly", "Minıséget, mértékkel" ("Quality not quantity"), "Enjoy [brand name] sensibly", "Geniet, maar drink met mate" ("Enjoy, but in moderation"), "Be responsible. Drink moderately", "Disfruta de un consumo responsable" ("Enjoy a responsible drinking"), "Please drink responsibly" to mention but some examples).*

- EFRD members will undertake to ensure that their brand and product promotion websites and web pages, their content and related technologies are designed for adults.

- EFRD members shall ensure that all brand and product promotion content placed by them on the Internet shall, by the nature of the content or by its presentation, be easily identifiable to the reasonably attentive viewer as a communication of a commercial.

For the purpose of this exercise, we collected for the first time information on these criteria. The reviews both covered EFRD member websites as well as websites of companies that are not a member of EFRD.

105 websites of the 368 websites reviewed belonged to companies that were not a member of EFRD. A further 23 websites of the websites reviewed belonged to EFRD member companies, but concerned wine-based products and champagne (not spirits). This information has been inputted in the graph below.
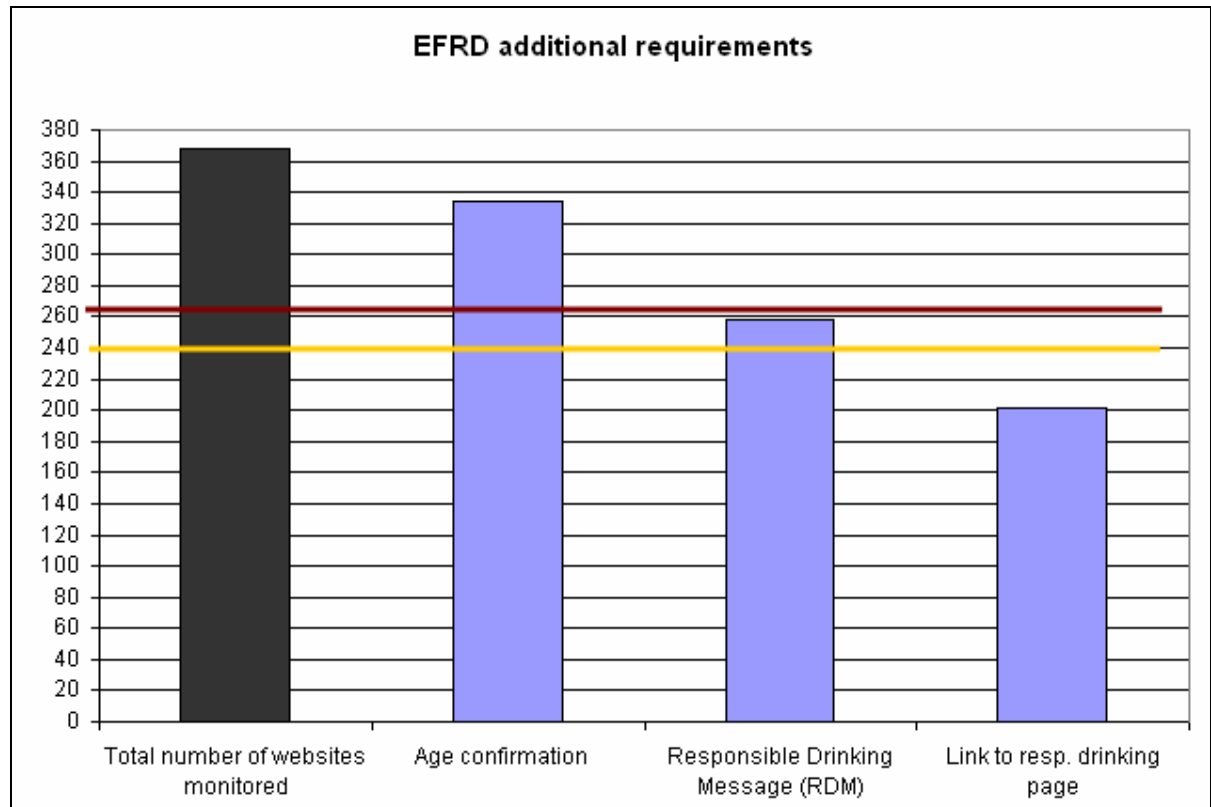
Graph 5: compliance with the EFRD 'Internet guidelines' requirements

———— N° EFRD member companies
———— N° of EFRD companies for non spirit products (champagne and wine based) -
corresponding to the number between the red and yellow line.

Total number of websites monitored	368
Age confirmation	334
Responsible Drinking Message (RDM)	258
Link to resp. drinking page	202

Table 5: compliance with the EFRD guidelines requirements

Responsible drinking messages which were not found to be readable enough (size, colour contrast etc) have been reported as missing.