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‘Peeling Back the Label’: Young People and Alcohol Advertising

Dalgarno Research Report (DRR)

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A synoptic look at evidence of alcohol advertising
impact on adolescent drinking behaviours.

YOUNG PEOPLE AND ALCOHOL ADVERTISING

WHAT IS THE IMPACT OF ALCOHOL MARKETING ON YOUTH?

Alcohol marketing is a global phenomenon in which companies spend considerable sums to establish and embed their brands in the lives and lifestyles of populations. Global spending on alcohol advertising of six of the largest alcohol producers, mostly concentrated in Europe and the United States, totalled more than US\$2 billion in 2006.¹

A thorough review of worldwide longitudinal research has concluded that exposure to alcohol marketing:

1. Reduces the age at which young people start to drink,
2. Increases the likelihood they will drink and
3. Increases the amount of alcohol they will consume once they have started to drink.²

Compared to other European countries, young people in the UK have by far the most positive expectations of alcohol and are least likely to feel it will cause them harm. Serious consequences are becoming more evident in the UK as a result of more young people drinking alcohol with alcohol-related hospital admissions increasing by 32% between 2002 and 2007. Between 2002 and 2009, 92,220 under 18's were admitted to hospital in England for alcohol related problems – that is over 36 children or young people each day!³



For the most part, this advertising is targeting young adults at the legal drinking age (i.e. 18 in the UK and 21 in US). However, younger people are exposed to these promotions. Investigations into alcohol marketing companies have shown 15 and 16 year olds are being used to guide campaign development and there is a clear acknowledgement that particular products appeal to children (e.g. in the UK, “Lambrini” is referred to by a marketing company memo as a “kids’ drink”). Companies are strategic in their advertising and have identified university students as a particularly promising market segment – as one Smirnoff presentation expresses it – a “*great place to create excitement and drive recruitment is within a student community*”.⁴ There is always the potential for such persuasive advertising to appeal and capture the imagination and aspirations of a slightly younger audience.

Dr Smyth, a consultant psychiatrist who runs the Youth Drug and Alcohol Service in Dublin, Ireland recently conducted a “snapshot” survey of alcohol usage among 34 adolescents aged between 14 and 18 who were entering treatment for drug or alcohol abuse. Dr Smyth, a co-author of the survey reported that the most popular drinks of these heavy drinkers were Budweiser (50%) and Smirnoff (27%) and not the cheaper brands as might be expected.

Dr Smyth is quoted in the Irish Examiner (13 October 2011) as stating:

“What was unexpected and most interesting was the level of brand loyalty. The stereotypical view of heavy drinkers is that they would be drinking Dutch Gold, that kind of thing, but they are drinking the more established brands.”

He said this indicated problem drinkers were not driven by the cheapest or strongest drinks.

“They are drawn to branding and promotion and that’s down to advertising. It is yet more evidence that alcohol advertising and sponsorship needs to be seriously restricted.”

He said a “frightening” finding was that more than 11% of respondents under 18 said their parents bought them alcohol. He said the average age at which participants first drank was 13, compared to 14-15 for the general population. ⁵

HOW MUCH ALCOHOL ADVERTISING ARE YOUNG PEOPLE EXPOSED TO?

Tobacco advertising was banned in Australia decades ago, but alcohol advertising has continued unfettered. Australian children’s exposure to alcohol advertising through online and digital media is rapidly increasing, but exposure remains highest through [traditional media](#) such as television, and sport sponsorship.⁶

Despite greater restriction of alcohol advertising and sponsorship in TV programming being recommended as a population-level strategy for delaying the initiation of drinking and reducing excessive alcohol consumption more than ten years ago⁷ clauses in the regulations allowing alcohol advertising in sport TV programming which undermine the protective intent of the regulations.⁸

Recent research on the amount of alcohol advertising in sport vs. non-sport programming in Australian free-to-air TV has presented concerning evidence that alcohol advertising during the daytime, when large numbers of children are watching TV, is predominantly in free-to-air sport TV. The study covered

Australian viewing habits of children up to 17 years of age at different times of the day.

Although current regulations ban alcohol advertising on free to air TV programs before 8:30 am, data collected from viewing statistics for 2012 showed more than 230,000 children were still watching TV during the daytime and over 270,000 were watching in the evening when they are not protected from exposure to alcohol advertising.

In a single year, Australia's children and adolescents experience more than [50 million](#) exposures to alcohol advertising through telecasts of the three major national sporting codes (AFL, NRL, cricket). Alcohol advertisements within these three sports represent 60 percent of all alcohol advertising in televised sport.

During the daytime, most of the alcohol advertising (87%) was on sport TV. In the evening, most alcohol advertising (86%) was in non-sport TV, but sport TV had more alcohol advertisements per hour than the non-sport programs.⁹


The COVID19 pandemic has shown us the importance of clean environments when it comes to infectious disease, but what about healthy environments to prevent Non Communicable Diseases? The return of the National Rugby League (NRL) saw XXXX cardboard spectators (above a gambling ad no less). We need to end alcohol advertising in sport.

Australian researchers agree that the regulations should be changed to reduce children and adolescent excessive exposure to alcohol advertising when watching sport.¹⁰

Any child with access to the Internet can instantly view alcohol-related advertising. Current UK research has shown that an average of 6% of views of adult oriented content on YouTube are made by 13 to 17 year olds. For example, if a beer or spirits commercial has had 10 million views on YouTube, an average of 600,000 children under the age of 17 will have seen it. Of real concern is that many of these alcohol promotions link booze to sports, music celebrities and advertisements promoting alcohol as “cool”.¹¹

Youth exposure to alcohol advertising on U.S. television increased 71 percent between 2001 and 2009, which is much more than the increase in exposure of adults aged 21 and above. Furthermore, exposure of youth (aged 12 to 20) to all distilled spirits TV advertising was 30 times greater in 2009 than in 2001, driven mainly by the rise of distilled spirits advertising on cable television, and by 2009 a majority of alcohol advertising on cable TV was occurring at programming times when youth were more likely to be viewing than adults 21 years or older.¹²

Popular music is another form of media through which young people are exposed to references



“ADVERTISING SENDS A POWERFUL MESSAGE TO KIDS THAT DRINKING IS SOMETHING EVERYONE NEEDS TO DO TO HAVE FUN AND LOTS OF FRIENDS... IT CAN BE DIFFICULT FOR PARENTS TO BE HEARD OVER THAT MESSAGE.”¹⁵

PROFESSOR SANDRA JONES, DIRECTOR OF THE CENTRE FOR HEALTH INITIATIVES AT THE UNIVERSITY OF WOLLONGONG

to alcohol. This can take the form of a coincidental reference to an alcoholic beverage or to a more deliberate naming of an alcohol brand or product. Having undertaken a study of 793 contemporary popular U.S. songs, a research team recently found one in five songs sampled had explicit references to alcohol and of these, one quarter mentioned a specific alcohol brand. These alcohol brand appearances are associated commonly with a luxury life-style characterized by wealth, sex, partying and other drugs. The research team estimated that the average US adolescent is exposed daily to 34 references to alcohol in popular music.¹³ We should hardly be surprised that the vast majority of young people in the economically developed countries are keen to imbibe socially and perceive consuming alcohol as an integral and essential part of their lifestyles.

Responses to an on-line “Alcohol Ads and You” survey by more than 2,300 children and young people in the UK and Wales, show that overall, under 18’s are not fully aware that some forms of ‘below the line’ alcohol promotion are in fact advertising the use of alcohol. For example,

- Only 48.6% recognised that joining a Facebook group for an alcohol product was marketing alcohol
- Only 50.4% recognised sponsorship of sports team shirts as alcohol marketing (note: young people who own alcohol merchandise such as T-shirts and baseball caps are 1.5 times more likely to try drinking alcohol than those who don’t)
- Only 48.3% recognised a festival named after a product as alcohol marketing
- Only 51% recognised a piece of alcohol product merchandise as alcohol marketing
- Only 43.4% recognised brand ambassadors (people paid to promote brands at events) as alcohol marketing¹⁴

HOW DO THE ALCOHOL MARKETING COMPANIES MANAGE TO GET UNDER THE RADAR?

While most advertising protocols do not allow advertisers to suggest alcohol can enhance social success of either an individual or an event, corporate documentation has been revealed that is full of references to brands doing both things. Terms like “social glue” and enhancing sociability with suggestions that a particular brand is “the perfect way to start the night” or “make the night sparkle” are implying social success.

However, the leaked internal planning documents of brewing giant Carling certainly had no regard for the above. The campaign state categorically that *“Carling celebrates, initiates and promotes the togetherness of the pack, their passions and their pint because Carling understands that things are better together”*.

They go on to specify “3 Aspects of ‘Belonging’..

- **Initiation:** Expressions of the moment when an individual joins a group and finds a happy home in the pack – *The Moment of Belonging*.
- **Celebration:** An expression of the sheer joy of belonging – *The Joy of Belonging*.
- **Contagion:** An expression of the magnetic power of the group – *The Power of Belonging*”.

The documents proceed to emphasise the importance of advertising in getting these themes across: “Broadly speaking each piece of communication will either; celebrate ‘Join Us’, by championing the benefit of togetherness, or facilitate ‘Join Us’, by providing and enhancing experiences where togetherness is key”.²⁷

Following that approach, although outlawed in some countries, is to suggest alcohol can enhance masculinity or femininity. For example, a key communication objective for the WKD brand notes the need to “communicate maleness and personality” or, in other brands, use of terms in advertisements such as “urbane”, “masculine” and “charismatic” along with pictures of George Clooney, Bono and Ewan McGregor.

Producers are also well aware that some market segments do drink irresponsibly and campaign briefs abound with references to “unwise”, and “immoderate” drinking and producers position their brand so that consuming their product can “crank up the evening” or “getting drunk with less volume of liquid”.

While sponsorship is not specifically addressed by advertising codes, it is a large and powerful part of alcohol promotion. It raises brand awareness, creating positive brand attitudes and building emotional connections with consumers. Sponsorship with football, lad magazines and music festivals are often intended to reach the young by demonstrating how the brand understands and relates to young people.

The explosion of social media and networking sites have become the favoured platform for alcohol advertising. Websites, email, viral marketing (e.g. encouraging young people to pass on messages to friends), Instagram, Twitter, Facebook, YouTube and other forms of social media offer alcohol producers almost limitless ways to engage with consumers more interactively and virtually unfettered marketing freedom. In this arena, guidelines and restrictions are far more difficult to monitor and impose by external authorities.



Even the requirement for entering an alcohol web site by providing an adult date of birth on an age verification page can be easily circumvented by young people entering a false date of birth, as no other evidence is required.

In their concluding remarks on the matter of regulatory failures in the area of restrictions on alcohol marketing, Hastings et al having undertaken research for the House of Commons Health Select Committee noted that “producers and agencies can exploit the ambiguities in the codes and push the boundaries of both acceptability and adjudication” and “the self-regulatory codes do not protect young people, they just hone the advertiser’s skills – either in camouflage or creativity.”⁴

This can be seen in the findings of recent research undertaken by RMIT University showing how alcohol companies are employing social media platforms and digital media to leverage their sponsorship of sport while formally admitting it’s not permissible to promote alcohol to youth, and all marketing regulations prohibit the promotion of alcohol to the young.

K Westberg et al report many alcohol sponsors of major sports, (especially AFL, NRL, cricket) typically employ Facebook, Twitter, YouTube and apps to embrace engage closely with consumers and have consumers embrace brands. What the researchers found was that, in real time, through social media and digital media, alcohol sponsors of sport use four distinct communications strategies or ‘calls’ on consumers of sport and social media: to compete, to collaborate, to celebrate and to consume.

- The **call to compete** engages consumers to compete with and against their friends and others to win a prize, frequently alcohol or alcohol branded;
- In the **call to collaborate** consumers are engaged by alcohol brands to co-create content (e.g. images and comments) that is shared on digital sites owned by the brand and can be co-posted on the consumer’s digital platforms, thereby disseminating the brand throughout the consumers’ personal and social networks;
- The **call to celebrate** requires the consumer to drink alcohol while basking in the reflected glory of sporting success;
- The **call to consume alcohol** normalises drinking as an integral part of the sports experience during the contest or game and afterwards, regardless of whether the team wins or loses.

These strategies normalise the connection of alcohol with sport, urge consumers to identify closely with alcohol brands, expose people of all ages to relentless promotion of drinking, and fail to offer any real protection of exposure to young people. The RMIT report also shows how children are caught up in the embrace of alcohol marketing via social media at alcohol sponsored sport events.

ALCOHOL MARKETING THROUGH INCREASED NUMBERS OF OUTLETS AND VISUAL IN-STORE PROMOTION

Another aspect of marketing which influences the early commencement of youth consuming alcohol relates to the number of liquor outlet licences being issued in a suburb or neighbourhood area. Australian research on changes in alcohol outlet density over time undertaken by B Rowland et al has shown that a 10% increase in overall density was associated with an approximately 17% increase in odds of adolescent alcohol consumption. Their study also showed that living in areas with a higher density of outlets was associated with a statistically significant increase in the likelihood of adolescents (aged from 11 to 17 years) developing early age alcohol consumption.

An extensive USA study on alcohol advertising and its influence on adolescent drinking showed that greater exposure of seventh grade non-drinkers to in-store beer displays resulted in an increase in the percentage of adolescents drinking by year 9.

The findings of these two studies would strongly suggest that, apart from consideration of effective educational programs, simply reducing the number of liquor outlets in any given area would lead to less in-store exposure to alcohol advertising and a reduction in the number of adolescents taking up drinking alcohol.

WHAT DO YOUNG PEOPLE WANT?

On a more positive note, what the “Alcohol Ads and You” survey did show was that under-18’s feel strongly about the levels of alcohol marketing to which they are exposed and want regulation that provides stronger protection. The vast majority do recognise alcohol advertising using traditional media channels. While they do not want to interfere with advertisers reaching adult audiences, they do want more robust regulation than currently exists. For example:

- 60% want alcohol advertising in the cinema restricted to 18-certificate films only and 12% want alcohol advertising in cinemas banned altogether
- 58% want alcohol advertising on television limited to after 9pm watershed and 10% want TV advertising banned altogether (Note: it is estimated that 1.6 million children and young people aged 4 – 15 years old were exposed to alcohol advertising during a single game of the televised football of the last World Cup)
- 59% want alcohol promotion limited only to the areas of supermarkets selling alcohol and 9% want it banned altogether in supermarkets and off-licences
- 61% want alcohol ads on the Internet banned from websites aimed at children and young people and 14% want it banned from all websites

A significant majority of the more than 2,300 young respondents to the on-line alcohol ads survey support the need for health warnings about the risks of alcohol.

- 70% of female respondents want clear labels with information about health risks on all bottles and cans
- 70% of all respondents 11 years and under support a short health warning at the end of each TV, radio and cinema advert.
- The majority of all young respondents believe that government should have greater oversight of alcohol promotion regulation and that the alcohol industry should pay to health messages about alcohol.^{3, 8}

WHAT REGULATORY STRATEGIES ARE BEING RECOMMENDED?

In Europe, the world's heaviest drinking region¹⁴, rates of youth drinking are particularly problematic¹⁵. Various alcohol policy measures are being considered to address this heavy drinking culture^{16,17,18}. Specifically, the need for changes to the European Union (EU)'s Audio Visual Media Services Directive (AVMSD¹⁹), which regulates (alcohol) advertising on audio-visual platforms, is being considered by the European Commission²⁵.

However, recent research involving more than 9000 adolescents across four European countries has shown that exposure to alcohol marketing of all kinds was positively associated with adolescents' alcohol use over time. The researchers advise that regulating alcohol advertising in television broadcasting is not the only imperative to address the problems associated with



early age drinking and binge drinking as young people are being significantly influenced by other marketing strategies such as sponsorship, web-based communications, ownership of branded merchandise, music events/festivals, product promotions and exposure to price offers²⁶.

HOW CAN WE RESPOND TO THIS APPALLING EXPOSURE OF OUR YOUTH TO ALCOHOL MARKETING?

There does not appear to be any silver bullet which will reduce our youth to unwanted and inappropriate exposure to alcohol marketing.

Areas which need to be addressed:

- ✓ Government regulatory frameworks need to be reviewed for their efficacy, taking into account the many forms of marketing established and particularly those emerging through new media and social networking.
- ✓ An educational program targeting the young with health messages relating to the risks associated with consuming alcohol need to be more prominent in the media to contrast with the existing promotional images of alcohol which encourage them to drink and to start drinking earlier and to drink more when they do. To quote one 15 year old responding to the on-line survey 'both my parents are alcoholics, you should put them in an ad so no one would drink.'
- ✓ Children and young people's views need to be incorporated into the government and regulatory body decision making mechanisms in order to better respond to the expressed and perceived needs of young people.
- ✓ A review of Government liquor licensing regulations with a view to restricting the number licences issued, particularly in areas with a high density of liquor outlets.
- ✓ Along with above, The Dalgarno Institute recommend more prolific and heavily promoted prevention focused measures, which should include...
 - *Advertising bans at all sporting events*
 - *Advertising bans on all Broadcast media*
 - *Promotion of social media which warns of risks associated with alcohol consumption*
 - *Health warning labels on all alcohol products*
 - *Raising Minimum Legal Drinking Age to 21*
 - *Far fewer liquor licences and outlets*
 - *Tougher penalties for sales of liquor to underage individuals*
 - *Town planning measures in growth areas and socio-economically disadvantaged areas be taken to maximise i) the delay of alcohol uptake, ii) the marginalising of alcohol use and iii) alcohol free precincts.*

REFERENCES

1. Jernigan D.H. The extent of global alcohol marketing and its impact on youth. 27 June 2008 John Hopkins Bloomberg School of Public Health. Cited 8 Nov 2011 on www.crisanet.org/docs/conference_o8/Papers/ALCOHOL_POLICY/Jernigan_Youth.pdf
2. Anderson P, deBruin A, Angus K, Gordon R, and Hastings G. Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies. 2009. Alcohol and Alcoholism, 44 (3) pp 229-243 Abstract cited on 8 Nov 2011 at <http://alcalc.oxfordjournals.org/content/44/3/229.abstract> and at http://www.safetylit.org/citations/index.php?fuseaction=citations.viewdetails&citationIds%5b%5d=citjournalarticle_94003_1
3. Alcohol Concern. Under-18s want more protection from alcohol marketing exposure. 20 Oct 2011. Alcohol Concern Press Release Cited on 8 Nov 2011 at <http://www.alcoholconcern.org.uk/news-centre/press-releases/under-18s-want-more-protection-from-alcohol-marketing-exposure>
4. Hastings G, Brooks O, Stead M, Angus K, Anker T & Farrell T. "They'll Drink Bucket Loads of the Stuff": An Analysis of Internal Alcohol Industry Advertising Documents April 2, 2010 The Alcohol Education and Research Council. Cited on 8 Nov 2011 at http://alcoholresearchuk.org/downloads/.../AERC_AlcoholInsight_0071.pdf
5. O'Keeffe C. Teen drinkers go for leading brands. Irish Examiner, 13 October 2011. Cited 8 Nov 2011 on. <http://www.irishexaminer.com/ireland/teen-drink-abusers-go-for-leading-brands-170481.html>
6. Carr S, O'Brien KS, Ferris J, Room R, Livingston M, Vandenberg B, Donovan RJ, Lynott D. Child and adolescent exposure to alcohol advertising in Australia's major televised sports. *Drug Alcohol Rev* 2016;35:406-411]
7. Casswell S, Thamarangsi T. Reducing harm from alcohol: call to action. *The Lancet* 2009; 373: 2247-57
8. Free TV Australia. Commercial television industry code of practice. Available: http://www.freetv.com.au/content_common/pg-code-of-practice.seo Accessed: 20 August 2014
9. Carr S, O'Brien KS, Ferris J, Room R, Livingston M, Vandenberg B, Donovan RJ, Lynott D. Child and adolescent exposure to alcohol advertising in Australia's major televised sports. *Drug Alcohol Rev* 2016;35:406-411]
10. Ibid
11. Alcohol Policy UK. Alcohol advertising on YouTube 'out of control' says marketing agency. 26 Sept 2011. Cited 8 Nov 2011 on www.alcoholpolicy.net/2011/09/alcohol-advertising-on-youtube-out-of-control-says-marketing-agency.html
12. The Centre on Alcohol Marketing and Youth, John Hopkins Bloomberg School of Public Health. Youth Exposure to Alcohol Advertising on Television 2001 – 2009. 15 December 2010. John Hopkins University. Cited on 8 Nov 2011 and available for download from http://www.camy.org/research/Youth_Exposure_to_Alcohol_Ads_on_TV_Growing_Faster_Than_Adults/index.html
13. Primack BA, Nuzzo E, Rice KR & Sargent JD. Alcohol brand appearances in US popular music. 2011 Cited 8 Nov 2011 on <http://onlinelibrary.wiley.com/doi/10.1111/j.1360-0443.2011.03649.x/abstract;jsessionid=2528DED56125113D3B450FE0DB40D487.do1to2>
14. Alcohol Concern Youth Policy Project. Overexposed and Overlooked: Young people's views on the regulation of alcohol promotion. 2011. Alcohol Concern, London. Cited on 8 Nov 2011 for Internet download at <http://www.alcoholconcern.org.uk/publications/policy-reports/overexposed>
15. Baker F, Why giving kids a taste of grog is a bad idea, Sunday Herald Sun, Body + Soul, 20 November 2011
16. Rowland B, Evans- Whipp T, Hemphill S, Leung R, Livingston M & Tombourou J The density of alcohol outlets and adolescent alcohol consumption: An Australian longitudinal analysis. Elsevier, Health and Place, Vol 37, pp 43-49, Jan 2016
17. Ellickson P, Collins R, Hambarsoomians K & McCaffey D. Does alcohol advertising promote adolescent drinking? Results from a longitudinal assessment. *Addiction*, Vol 100, Issue 2, pp 235 – 246, Feb 2005

18. Westberg K, Stavros C, Munro G, Argus K. Merging Sport and Drinking Cultures through Social Media, 2015. Cited on 25 August 2016 at: <https://www.fare.org.au/wp-content/uploads/research/Merging-sport-and-drinking-cultures-through-social-media.pdf>
19. World Health Organization Global status report on alcohol and health—2014. Geneva: World Health Organization;2014. Cited on 25 August 2016 at http://www.who.int/substance_abuse/publications/global_alcohol_report/en/
20. Hibell B., Guttormsson U., Ahlström S., Balakireva O., Bjarnason T., Kokkevi A. et al. The 2011 ESPAD report. Stockholm: The Swedish Council for Information on Alcohol and Other Drugs; 2012. Cited on 25 August 2016 at http://www.espad.org/uploads/espad_reports/2011/the_2011_espad_report_full_2012_10_29.pdf
21. British Broadcasting Corporation (BBC). Proposed minimum alcohol price law is published. BBC; 2015. Cited on 25 August 2016 at <http://www.webcitation.org/6aOBd2g6g>
22. France 24. French government battles wine-growing senator over alcohol ads. 2015. Epub 6 September 2015. Cited on 25 August at: <http://www.france24.com/en/20150609-france-alcohol-advertising-law-evin-amendment-touraine-wine>
23. EUCAM. MEP calls for booze ad ban. EUCAM, Nov 2014. Cited on 25 August 2016 at: <http://eucam.info/2014/11/30/mep-calls-for-european-alcohol-advertising-ban/>
24. Audio Visual Media Services Directive, 2010/13/EU (2010). Cited on 25 August 2016 at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:095:0001:0024:en:PDF>
25. European Commission. Public consultation on Directive 2010/13/EU on Audiovisual Media Services (AVMSD)—a media framework for the 21st century. 2015. Cited on 25 August 2016 at: <https://ec.europa.eu/digital-agenda/en/news/public-consultation-directive-201013eu-audiovisual-media-services-avmsd-media-framework-21st>
26. De Bruijn A, Tanghe J, de Leeuw R, Engels R, Anderson P, Beccaria F, Bujalski M, Celata C, Gosselt J, Schreckenberg D, Słodownik L, Wothge J, and van Dalen W, European longitudinal study on the relationship between adolescents' alcohol marketing exposure and alcohol use, *Addiction*, doi: 10.1111/add.13455, published 2 August 2016, cited on 25 August 2016 <http://onlinelibrary.wiley.com/doi/10.1111/add.13455/full>
27. Memorandum by Professor Gerard Hastings, Institute for Social Marketing, University of Stirling & the Open University (AL 81) "They'll Drink Bucket Loads of the Stuff" An Analysis of Internal Alcohol Industry Advertising Documents pp1-2



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