



ALBA | CHRUTHACHAIL

## Scottish Government Consultation: [Alcohol Advertising and Promotion](#)

*Submitted: March 2023*

### **Consultation Questions as answered**

#### **Sports and events sponsorship**

*5. Do you think we should prohibit alcohol events sponsorship in Scotland?*

No

*Please explain your answer in the text box:*

Creative Scotland is the funding, development and advocacy body for the arts, screen and creative industries in Scotland. We support in principle the Scottish Government's objective to reduce alcohol consumption and alcohol related harm, especially relating to children and young people and high risk drinkers. There are a number of areas in this consultation which we feel would benefit from greater clarity, evidence and a wider consideration of impact.

In the meantime, we do not believe that the proposals are justified, given the potential loss to the cultural sector across Scotland that such a restriction would entail. Creative Scotland is aware that alcohol sponsorship represents a key revenue stream for many organisations, events and festivals in the arts, screen and creative industries.

There are many different business models as to how sponsorship plays out across these sectors. It could be in the form of sponsorship of an event, the provision of bars at a festival, or in kind sponsorship for a gallery opening. Creative Scotland believes that the impact of removing alcohol sponsorship as a revenue stream, especially at this time of acute financial challenge, has not been addressed in the consultation. The arts, screen and creative industries were some of the hardest hit in the pandemic, with audience numbers still not back to pre-Covid numbers, and the impact of Brexit, energy costs and the cost of living crisis add to current difficulties. If, as is proposed, sponsorship of events is banned, there is a very real concern that some festivals and other events would lose revenue to such an extent that the event may not be able to run, affecting the cultural life of Scotland and the benefits that brings. This is especially true of commercial events and festivals which currently run without any public subsidy. Either these would not take place, or they would need funding from other streams, including public funding, to keep going. At a time of severe public funding constraints, the threat of prospective cashflow insolvency as a consequence of continued operation is a real one. The impact of this would vary across artforms. For example, the

music sector is often closely tied with alcohol sponsorship for festivals, or in Traditional Arts, where a folk band could have a tour sponsored by a local distillery. In comparison, the visual arts sector might suffer less, as their sponsorship may well be confined to in kind benefits of the provision of drinks for an exhibition opening, which can potentially be adapted.

A wider impact would also be anticipated on local communities, local economies and tourism, as well as further restricting access to attendance and participation with cultural events, as well as on the cultural life of Scotland, including our ability to tour abroad. Alcohol sponsorship is key in these areas and losing this would potentially mean the loss of key cultural events, changing the cultural ecosystem. This could be that a community loses a key focal point for tourism and employment for the year, for example a book festival, which drives visitors to the area, having a knock on effect in the tourism and hospitality industries. Losing events can also impact on access to culture and participation in cultural life, commitments to which have been made in other areas of government policy, for example, the National Performance Framework, the creation of 20 minute neighbourhoods or the commitment to UN Sustainability Goals.

Whilst we have some data around the value of alcohol sponsorship to the cultural and creative sectors, we do not have definitive figures. Creative Scotland would like to see this data, to enable us to gauge the true impact on the sector. It is likely that smaller, independent organisations would be impacted the most by this, affecting areas and neighbourhoods where provision is more limited.

We would therefore welcome a more holistic approach to this proposed legislation, with research being undertaken to fully understand the impact of losing alcohol sponsorship to the sector, including the effect on individual events, local communities, the cultural life of Scotland and on other Scottish Government policies.

We are also worried that the arts, screen and creative industries are not being considered in their own right through this consultation, with assumptions being made that what happens with sports sponsorship can be translated to sponsorship of cultural events, and little to no evidence being provided of the impact of alcohol sponsorship of events.

For example, there is the assumption that the type of alcohol sponsorship and advertising at sporting events and cultural events is the same, where children and young people are routinely exposed to alcohol advertising through billboards and logos on sports kit. Whilst there is some obvious advertising of alcohol at cultural events, it can be far more nuanced than this and it is not clear what reach this has amongst those who are under 18. In addition, the prevalence of logos or billboards advertising alcohol sponsors can be either discreet or non-existent. Before instigating a blanket ban based on data from sporting events, Creative Scotland would support in-depth research being undertaken which examines the visibility of alcohol advertising and the audience demographic who attend events and festivals. There is already legislation surrounding how alcohol can be advertised, and cultural events have the ability to differentiate their programme in a way that sporting events do not. For example, in a festival, there may be adult only events, which would attract alcohol sponsorship, and family events which would not. In this way, the nature of alcohol

sponsorship of cultural events can be more targeted and tailored than other areas, and consideration of this is crucial when discussing a ban.

It is clear that an impact analysis for the cultural and creative sectors is required, as it can't be considered as automatically analogous to the sports events sector. There is no indication that many of these nuances have been considered in the consultation, and further research around all of these issues would be welcome, before Creative Scotland would feel confident in changing its view of the proposals.

*7. What, if any, events do you think should be excepted from a prohibition on alcohol events sponsorship, and why?*

As stated above, we would welcome a clear impact assessment on the current impact of alcohol sponsorship of cultural events, including the financial impact, wider impact on communities and the cultural landscape of Scotland and a clear understanding of the impact on children and young people and high risk drinkers. In the meantime, our view is that all events of a cultural nature should be excepted from a prohibition on alcohol events sponsorship.

*8. If alcohol sponsorship restrictions are introduced, do you think there should be a lead in time for these?*

Yes

*Please explain your answer in the text box:*

Some sponsorship deals are multi-year, others some can be ad-hoc, but with the same partner. Some events or festivals might have an alcohol sponsor as one of a number of sponsors, others might have them as a major sponsor. The impact of any situation would be a loss of revenue, and it would take time for alternative funding to replace it, if indeed alternative funding can be found. In some cases, the loss of sponsorship may lead to the event or festival shutting down for good. Sources of funding are increasingly difficult to come by as many sectors are still suffering from the impact of Covid, Brexit and the cost of living crisis.

Taking all this into account, the longer the lead in time, the better, to enable any alternative funding to be found. Within this section, we would also welcome discussion around the possibility of the Scottish Government providing support to bridge the gap before a new sponsor can be found, and any information around this would be welcomed.

### **Outdoor and public spaces marketing**

*9. Do you think we should prohibit alcohol marketing outdoors, including on vehicles, and in public spaces in Scotland?*

No

*Please explain your answer in the text box:*

It is not clear from the consultation whether this would include outdoor marketing for events where the sponsor is included on the advert for the event in question. If this were the case, we would like to see a greater evidence base as to the impact of this kind of advertising, before being able to recommend a response.

*11. What, if any, exceptions do you think there should be to prohibiting alcohol marketing outdoors, including on vehicles, and in public spaces in Scotland? Why?*

As above, we would welcome clarity of including logos of sponsors on posters and vehicles which are advertising cultural organisations and events, as opposed to direct alcohol marketing.

### **Print advertising**

*20. Do you think that we should prohibit advertising of alcohol in newspapers and magazines produced in Scotland?*

No

*Please explain your answer in the text box:*

Creative Scotland would encourage the consideration of the impact of the prohibition of alcohol advertising on publications which review and critique the cultural and creative sectors, such as *The Skinny* or *The List*. These publications provide a valuable contribution to the vitality of the cultural life in Scotland. They play an important role in the creative ecosystem by providing critical responses to work that would be less likely to be provided space in mainstream media. In this regard, it should be recognised that there is a shrinking space for arts coverage in more mainstream publications. Most importantly, such specialist arts publications act as a vehicle for the promotion of performances, books, exhibitions and events across Scotland, connecting them to paying audiences. The loss of advertising revenue for these publications could be significant, which would have a wider impact on the sector as a whole.

As above, Creative Scotland would support research into understanding the extent of alcohol sponsorship and advertising in these publications, the impact of prohibition of sponsorship and advertising and the audience demographics and exposure to those under 18 or higher risk drinkers, before making a recommendation.

*21. What, if any, exceptions do you think there should be to prohibiting alcohol advertising in newspapers and magazines produced in Scotland?*

As above, we would encourage special consideration being given to those publications which review and critique the cultural and creative sectors.

### **Television and radio advertising**

*29. Do you think we should explore prohibiting alcohol advertising on television and radio completely (e.g. like Norway or Sweden)?*

No

*Please explain your answer in the text box:*

Whilst we acknowledge that TV is a reserved matter, if this were to be addressed, we would recommend considering the wider impact of removing revenue from commercial broadcasters, for example, Channel 4 and ITV, which support a wider network of producers and studios across the film and TV ecosystem. A reduction in revenue may have a knock on effect on the work that they currently undertake in this area and the projects they are able to support.

### **Cinema advertising**

*31. Do you think alcohol advertising should be restricted in cinemas?*

No

*Please explain your answer in the text box:*

Creative Scotland would wish to see extensive research being undertaken about how alcohol advertising is already restricted, the number of under 18s who see alcohol adverts in the cinema and the impact of it, before making a recommendation. In addition, we would like to understand the likely financial impact that the banning of alcohol advertising would have on revenues. Like the rest of the cultural sector, cinemas are suffering from a slow return of audiences after Covid and the cost of living crisis, with a notable example of the Centre for Moving Image already having gone into administration. Any further stress on finances should be considered in the light of this, or how the gap in revenue would be addressed. It should be noted that the smaller cinemas in smaller areas of Scotland would be the most impacted by a ban on cinema advertising. Alcohol advertising in the cinema is already regulated through the CCA, with statutory requirements and fines for non-compliance. If changes were to be made to this, we would support them being done within the scope of the current framework and in full consultation with the sector.

*32. If alcohol advertising was restricted in cinemas, what, if any exceptions (e.g.products in scope, times of day, or specific movie ratings) do you think should be considered?*

As above, we would support any further restrictions being undertaken in full consultation with the sector and within the framework which already exists.

### **End questions**

*39 Do you think the Scottish Government should look to introduce a comprehensive package of restrictions across a number of marketing channels? If so, what do you think this package should include?*

No

*Please explain your answer in the text box:*

As stated throughout our response, it is clear that the cultural and creative sectors are different from other sectors, both in the nature of any alcohol sponsorship, the potential financial impact of any prohibition and the lack of evidence around the impact that alcohol

sponsorship has in this area. It is imperative that more research is undertaken to understand the impact any ban on alcohol sponsorship would have in a more holistic way before taking any further action. We would therefore not support a blanket ban across many different sectors.

*41. What further evidence on alcohol marketing you would you like the Scottish Government to consider?*

As we have set out previously in this consultation response, we would appreciate a clear and in depth assessment of the impact of alcohol sponsorship of cultural events on influencing children and young people and high risk drinkers in particular. In addition, we would like that assessment to include the likely impact on the arts, screen and creative industries, should prohibition of alcohol sponsorship be introduced, not just in the financial value which would be lost, but what that would mean in real terms for the cultural landscape of Scotland.