

Club Soda

Amending limitations on advertising low-alcohol products

Question 1: Do you agree with CAP and BCAP's proposed new rule to replace CAP rule 18.9 and BCAP rule 19.10? Please set out your arguments for supporting or disagreeing with the proposal.

We agree with the proposal.

We base our view on several assumptions:

1. Alcohol-free beers, wines, ciders and spirits are treated as age restricted products in both licensed venues and in retail settings.
2. Low alcohol in this context is 1.2% ABV or below
3. Alcohol-free is 0.5% ABV and below in most countries across the world, and in the UK the government is currently reviewing the labelling requirements for 0.05% - 0.5% ABV products; we expect them to be labelled alcohol-free in future
4. Drinks in the soft drinks category can also contain up to 0.5% ABV alcohol, with no need to mention this on their labelling or marketing.

Club Soda is a mindful drinking movement. We are a social impact business aimed at helping people drink more mindfully and live well. We use behaviour change science to support people to change their drinking habits.

We use the [behaviour change taxonomy](#) developed at University College London to employ specific behaviour change techniques that we believe best support self-efficacy in changing drinking habits. One key behaviour change technique we utilise is behaviour substitution (BCT 8.2): prompting our members to substitute the unwanted behaviour (drinking alcoholic drinks) with a wanted or neutral behaviour (choosing low and no alcohol drinks).

When changing drinking habits, substituting an alcoholic drink for a non-alcoholic one is a technique that has supported many of our 50,000 members to reduce or quit their alcohol use. This is especially the case in social settings where a sense of belonging and taking part is very important.

Clearly there are many types of alcohol-free drink out there that people could choose from. So why does it matter if producers create a low or no alcohol drink under the same branding as an alcoholic version?

We are aware of the debate on so-called alibi marketing, the idea that big alcohol brands use alcohol-free products to encourage people to drink more of their full strength drinks. However, we can find little evidence that this behaviour actually takes place anywhere.

Statistical analysis by Anderson et al. did find that the introduction of low and no alcohol beers to the UK market from 2015 to 2018 led to an overall reduction in the consumption of alcohol in beer. This suggests that consumers use low and no alcohol beer as a substitute for alcoholic beer, and not as an addition to it. (Anderson P, Jané Llopis E, O'Donnell A, et al: Impact of low and no alcohol beers on purchases of alcohol: interrupted time series analysis of British household shopping data, 2015–2018, *BMJ Open* 2020;10:e036371. doi: 10.1136/bmjopen-2019-036371.)

In addition, currently all drinks within the emerging category of low and no alcohol are positioned in retail and on-trade outlets as age restricted products (for those of a legal age to buy alcohol). We have seen no calls from producers for this voluntary restriction to change.

There also seems to be an implicit understanding of producers in this new emerging market that they also adhere to the Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks and the Code of Practice on Alcohol Sponsorship operated by The Portman Group.

In addition, our own research has concluded that consumers looking to reduce the amount of alcohol they drink are more likely to do so by switching to a low or alcohol-free version of a brand they already recognise and like. It seems to us that alcohol brands producing alcohol-free versions of their drinks will reduce the total amount of alcohol people drink, rather than the other way around.

Our research findings in summary are as follows. We conducted an online survey of Club Soda members living in the UK in November/December 2020. Of the 234 respondents, 59% had stopped drinking alcohol altogether, 36% had reduced the amount of alcohol they drink.

We also asked about the brands of alcoholic and non-alcoholic drinks the respondents consumed. There was some brand loyalty between alcoholic and alcohol-free drinks: 35% said they sometimes drink the same brands and sometimes different brands. Only 10% of the respondents said they had switched from an alcoholic to an alcohol-free version of the same brand. A higher percentage (12%) said there were no alcohol-free versions available of their usual alcoholic drinks. A quarter said they had either switched to a different brand of drink (25%) or to a different type of drink altogether (26%). Note: the respondents were able to select more than one answer to this question, so these figures do not add up to 100%. The number of responses was only about 10% higher than the number of respondents so not many people answered with several choices.

What does this tell us about the choices of consumers? Adding up the answers, less than half of the respondents have been able to find alcohol-free versions of their usual current or past alcoholic drinks. More than half have had to find new brands or even completely new drink categories of alcohol-free drinks to choose.

This additional required effort makes it harder to switch from alcoholic drinks to non-alcoholic ones. From the discussions in our online community and in-depth interviews with a number of these consumers, we know people are always delighted when their favourite alcoholic drink brand releases an alcohol-free version: they are able to enjoy the same taste but without the alcohol.

We are therefore concerned that any obstacles on brands releasing and marketing their low and no alcohol options will make it less easy for Club Soda members and other consumers to reduce their alcohol use.