

Scottish Government: Consultation on Restricting Alcohol Advertising and Promotion Response from Festivals Edinburgh [09 March 2023]

[the following is a summary of our response to the online questionnaire]

The events landscape in Scotland is of great international appeal but its core benefit, first and foremost, is to the mental, cultural and physical health of our local populations. However, the events sector is today in an extremely fragile and perilous state.

In recent years there has been a c30% real terms cut in the Scottish culture budget, 20% of audiences are not returning in our post-pandemic world, and the current cost of living crisis has led many events into hibernation or closure.

A prohibition on a further income stream, namely alcohol events sponsorship, would be extremely problematic for the events sector in Scotland - and much more so than for our EU counterparts where their larger public funding contributions provide them with more flesh on their bones [average public funding for culture is 1.2% of GDP in EU compared to 0.8% in Scotland].

The sponsorship sector in Scotland is not blessed with major players and many of these are already contracting, whether due to environmental concerns with oil and gas industry, or mergers and buy-outs in the financial sector reducing the budgets and decision-making centres in Scotland.

One of the only major sectors left to work with on sponsorship matters seems to be the alcohol industry. As with many in our festivals sector, the income contribution to overall budget from the alcohol industry is on a continuum from 2% to 10%. Although this might seem like a modest contribution it needs to be seen in the context of the wider funding environment outlined earlier. As such, a prohibition on alcohol events sponsorship might see festivals and events suffer 'death by a thousand cuts'.

Many of the most successful sponsorship arrangements exist in a multi-year format, which creates a degree of financial security for an event and allows them to strategically plan to build awareness, introduce services, and strengthen their overall brand. However, the immediate introduction of sponsorship restrictions could create a 'cliff edge' for organisational finance and stability, and thus, at the very least, all such multi-year arrangements should be allowed to run through to their contractual conclusion.

The consideration of restrictions to alcohol events sponsorship has already had a chilling effect on the sponsorship sector, with two of our member festivals reporting that conversations with potential sponsors have been negatively affected.

The Edinburgh Festivals are not driven by a profit motive but rather about enhancing people's health and well-being through a greater cultural offering. We act positively and responsibly in all aspects of our work, and expect our partners and sponsors to act in a similar manner.

A prohibition on alcohol events sponsorship in Scotland might have the unintended consequence of negatively affecting people's mental, physical and cultural health through the curtailing of cultural activity – and as such it would be interesting to have an evidential basis that aims to create a cost/benefit analysis and thus produce a well-balanced plan of action.

We know that alcohol misuse is a serious problem for Scotland and are in favour of legislation that helps deal with the issue, particularly for children and young people. However, these proposals seem to start from the premise that alcohol is the problem rather than misuse of alcohol and as such are aimed at the general population rather than being more effectively targeted.

As such, we would suggest that alcohol sponsorship should be prohibited at events where the majority of participants or competitors are children, and/or where the audience or spectator profile is dominated by those aged under 18. We also believe that those events where the majority of participants or competitors are adults,

and/or where the audience or spectator profile is dominated by those aged over 18 should be excepted from a prohibition.

With regard to print, cinema, television and radio advertising, we believe that given the extensive legislation already in place including the strict rules around advertising, the answer might be to have more effective enforcement of existing legislation rather than the introduction of new legislation. This enforcement should be particularly rigorously applied to advertising targeted at young people.

A code enforced by the Advertising Standards Authority already stipulates that alcohol ads must not be directed at people under 18 or contain anything likely to appeal to them by reflecting youth culture – and anyone that features in an alcohol ad must be 25 years of age or over, and look it. The strict enforcement of these, and other, aspects of the code could achieve the desired results.

In the context of online advertising, we are not saying ‘no’ to the restriction, but rather ‘no’ to this being a priority for the legislation – and we have taken that stance because we believe that it would be a near impossible task to implement such a measure, regardless of the merits, given the large amount of such content originating outside Scotland. As such, our view is that the legislation should be more strictly focussed on those areas where there is complete clarity and control of enforcement.

[a number of items in the online questionnaire, such as those relating to in-store alcohol marketing, were judged to be outside our remit and expertise]

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