Alcohol marketing in the era of digital media platforms

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Abstract

Objective: Digital media platforms like Facebook and Instagram play a significant role in the marketing of alcohol, connecting producers and consumers in novel ways. Alcohol marketers have proven to be innovative experimenters with the participatory and data-processing power of these platforms. The aim of this article is to (1) scope how digital advertising and media are typically understood and operationalized in the public health literature, and (2) to develop a conceptual framework for investigating alcohol marketing on platforms by identifying new and specific platform affordances that should inform further research in this area.

Method: A conceptual review drawing on research on digital alcohol marketing in the public health literature, conceptualizations of digital platforms in media and communication literature, and instructive examples from industry sources.

Results: The article identifies five key challenges alcohol marketing on digital platforms poses to regulatory and self-regulatory frameworks, which so far have not been sufficiently considered in the public health literature.

Conclusions: The review suggests that in addition to assessing the content, volume and placement of alcohol advertising, research and regulatory responses need to address alcohol marketing on digital platforms as a dynamic, participatory, and data-driven process.

Keywords: alcohol; marketing; advertising; digital; platforms; social media
Introduction

Digital advertising by alcohol brands is now said to attract more marketing investment than traditional media channels (Jernigan and Ross, 2020), making digital media platforms significant institutional actors in the marketing of alcohol. Facebook, Instagram, and YouTube are among the largest advertiser-funded media companies in the world, accounting for over 50% of spending on digital advertising (ACCC, 2019). The innovative use of these digital platforms by alcohol marketers needs to be understood as part of the larger strategic effort to reverse the decline of alcohol consumption among young people in developed countries, to consolidate the increasing consumption of older drinkers (AIHW, 2020), and to create new markets in developing countries with a young, internet-using consumer base (Gupta et al., 2018a, 2018b). The dynamic and fast-paced nature of technological innovation and change characterizing the digital media environment poses new challenges to researchers aiming to investigate the nature and effects of digital alcohol marketing.

Systematic reviews of alcohol marketing (Jernigan et al., 2016) and narrative reviews of digital alcohol marketing (Lobstein et al., 2016) demonstrate that the first studies of alcohol marketing using digital media focused on standalone websites and display advertising. These were then followed by research that examined the interactive engagement characteristic of early forms of social media. However, the research reported in these reviews does not fully account for the data-driven capabilities and affordances of digital platforms. Digital media platforms like Facebook, Instagram and YouTube are more than just transmission channels for promotional communication or online networks for the sharing of user-generated content. Rather, they have developed into a new kind of market actor,
combining the sale of advertising with a range of marketing services including data analytics, retail and distribution plug-ins, and tools for managing partnerships with consumers and cultural intermediaries like influencers (van Dijck, 2020).

The purpose of this article is: (1) to scope how digital platforms and channels are typically understood and operationalized in the public health literature, and (2) to develop a framework for investigating alcohol marketing on platforms by identifying specific platform affordances that should inform further research in this area. We propose that exposure-centric and engagement-centric views of digital alcohol marketing need to be complemented by a platform-centric perspective (see Figure 1).

**Methodology**

This study presents a conceptual review of digital alcohol marketing that aims to produce novel insights by bridging to other discipline areas, methods and theories (Hulland, 2020). In this case, we draw on three types of material:

Firstly, we examine recent systematic and narrative reviews of alcohol marketing (Jernigan et al., 2016, Lobstein et al., 2016) together with searches for additional studies published since these reviews. We analyse how these studies conceptualize advertising on digital platforms.

Secondly, we draw on research in the field of communication and media studies that offers a conceptual framework for understanding the properties and affordances of digital media platforms that have not received sufficient attention in studies of alcohol marketing featured in recent systematic and narrative reviews.
Thirdly, we draw purposefully from our ongoing monitoring of alcohol marketing on social media platforms, advertising industry press and decisions by self-regulatory industry bodies to illustrate some of the uses of digital media by alcohol marketers that are not documented in systematic and narrative reviews.

**Digital alcohol marketing: Key themes in the literature**

Studies of digital alcohol marketing in the public health literature predominantly take an exposure-centric or engagement-centric view of advertising and marketing. Exposure-centric conceptualizations of digital alcohol marketing operationalize advertising as the creation of a specific, self-contained and stable ‘text’ that contains a specific message (an ‘advertisement’) that is transmitted through a channel to an audience (the process of ‘exposure’). Exposure-centric research is concerned with the nature and volume of exposure and its effects on audiences in terms of awareness, favorability and, ultimately, the consumption of alcohol (Barry et al., 2016; Barry et al., 2018a, 2018b; de Bruijn et al., 2016a, 2016b; Dunlop et al., 2016; Hoffman et al., 2017; Jernigan & Rushman, 2014; Jernigan et al., 2017b; Lim et al., 2016; Weaver et al., 2016; Winpenny et al., 2013; Hendricks et al., 2020). Consequently, the control of exposure is considered to be an important regulatory measure. In comparison, engagement-centric conceptualizations of digital marketing emphasize that the participation of consumers in the creation and circulation of content is a key characteristic of digital media (Lobstein et al., 2016, Moreno et al., 2016; Carotte et al., 2016; Jones et al., 2016).

As the research in this tradition points out, the participatory affordances of social media platforms create the conditions for drinking culture to be continuously converted into flows...
of images, video, and data (Goodwin et al., 2016, Lyons et al., 2016, Niland et al., 2017).

Marketers ask consumers to like, share and comment on content produced by marketers (Author, 2014, Montgomery et al., 2009, Zwick et al., 2008). They encourage consumers to use brand hashtags and to post images and videos that incorporate branded products, spaces, and experiences. There is some evidence that this kind of user engagement with brand-produced content affects consumers’ attention, disposition, and purchase intention (Mayrhofer et al., 2020, Noel et al., 2018). Current drinkers appear more likely to engage with alcohol brands’ content, and participation appears to be linked with brand identification (Critchlow et al. 2019). Consumers also participate in alcohol marketing on social media by creating and sharing images that represent and publicize their drinking practices (Atkinson et al., 2017, Brown & Gregg, 2012, Author, 2014, Author, 2014, Dobson, 2014, Goodwin et al., 2016, Goodwin & Lyons, 2019, Lyons et al., 2016, Niland et al., 2016; McCreanor et al., 2012). Young people engage with alcohol brands and related promotional material online and thereby (re)produce valuable drinking identities (Alhabash et al., 2015; Atkinson et al., 2016; Authors, 2014; Hoffman & Pinkleton, 2014; Lyons et al., 2014; Lyons et al., 2016; Niland et al., 2017; Purves et al., 2018; McClure et al., 2016; Moreno & Whitehill 2015).

Research on the ‘engagement’ of consumers in the process of creating and sharing alcohol promotion online is an important conceptual and methodological step. While an exposure-centric view aligns with the first wave of digital advertising that transported familiar forms of display advertising into online channels, an engagement-centric view reflects the second wave of digital marketing instigated by web 2.0 and social media platforms that are founded on consumer participation in the creation and circulation of content. However, neither exposure-centric nor engagement-centric perspectives adequately reflect how the
advertising models of digital platforms have matured from display, to organic participatory engagement, to a third wave characterized by paid data-driven engagement that aims to optimize consumers’ perceptions and actions (BBDO, n. d.). We argue for the development of a platform-centric view of digital alcohol marketing to complement exposure-centric and engagement-centric perspectives.

**Conceptualizing alcohol marketing on digital platforms**

Over the past decade the early display, search and engagement-based forms of online marketing matured into platform business models organized around the collection and processing of data. Platforms combine the data-driven and participatory affordances of digital media. They engineer an infrastructure of connectivity that translates our expressions, daily lives and movements into data (Alaimo & Kallinikos, 2017, van Dijck, 2013, Mayer-Schönberger & Cukier, 2013). This data is used to make predictions about users, capture and direct their attention, and organize the flow of information, content, goods and services. van Dijck et al. (2018: 9) argue that platforms are ‘fuelled by data, automated and organized through *algorithms* and *interfaces*, formalized through *ownership* relations driven by *business models*, and governed through *user agreements*’. Platforms are now key intermediaries in the interaction between consumers and marketers. They operate as multisided markets (Nieborg & Helmond, 2019) – programmable infrastructure that orchestrate and optimize relationships between consumers, businesses, and platforms.

Mass media captured and sold audience attention (i.e. exposed them to advertisements) using a technically stable medium (i.e. while there were innovations in the textual nature of promotional appeals, the basic apparatus of print and broadcast media didn’t change all that much through the twentieth century). By contrast, platforms constantly experiment
with the capacity of the medium itself to monitor and organize social life (Author, 2016, McStay, 2013, Andrejevic, 2019, Helmond et al., 2019). This means we need to study not only the content of advertising messages, their placement and their exposure effects. We also need to pay attention to how platforms automate the collection and processing of data to learn about consumers, and how they run experiments to optimize engagement with them. These experiments are not transparent or subject to any kind of ethical review (Metcalf & Crawford, 2016). To put it simply, if the process to conceptualize, monitor and regulate in mass media was ‘exposure’, then perhaps the process we now need to reckon with is ‘experimentation’. In the following, we set out five distinctive features of a platform-centric view of digital alcohol marketing.

1. Alcohol marketing on digital platforms formalizes participation

With the emergence of social media platforms, alcohol marketers began to encourage consumers to spread their messages in their social networks by incorporating branded content into their own posts, or by interacting with and sharing the posts of brands and their partners (Author, 2014). Over the past decade we have witnessed a formalization of these participatory strategies on platforms like Instagram, YouTube and Snapchat. One important aspect of this formalization is the rise of influencers – social media users with large followings – who partner with brands to promote products, in many cases by featuring the product without clear disclosure (Abidin, 2016, Cotter, 2019, Davies & Hobbs, 2020). Another key dimension is that as marketers get less ‘organic’ or free reach, they need to ‘pay to play’ (Cooper, 2020). In the mature platform marketing model, consumer participation on digital platforms is valuable because it generates both content and data.
Marketers give up some control over the content of messages, but in return gain a much greater capacity to learn from consumers and shape their engagement with them (Andrejevic, 2019, Author, 2017, Author, 2018, Darmody & Zwick, 2020).

Consumers and influencers are encouraged to produce content on behalf of brands. This collapses the distinction between advertising and other kinds of content that circulates on platforms like selfies, stories and augmented reality filters (Author 2020). Influencers purposefully behave like ordinary platform users, drawing on the vernacular creative practices of platforms – posting selfies, short ephemeral video ‘stories’ and using augmented reality filters that digitally alter and enhance their appearance (Abidin, 2016, Author, 2020, Leaver et al., 2020). In many cases, consumers and influencers can represent alcohol consumption in ways that brands cannot, associating it with their own identities as well as harmful and excessive practices. These forms of marketing are difficult for consumers to distinguish and for researchers and regulators to monitor.

**Example 1:** A campaign by Furphy Beer partnered with the influencers Mitch Cox and Cleo Codrington, who embedded the beer brand in posts chronicling their holiday adventures.
The Australian alcohol industry’s self-regulatory scheme for alcohol advertising found the campaign in breach of several guidelines, including the use of models under the age of 25 and the failure on part of the influencers to activate age-controls for their posts. This means that the posts were potentially seen by underage Instagram users. The self-regulatory body did not consider whether the posts
adequately disclosed the commercial partnership between the influencer and brand, as required in Australia (ABAC 2018).

2. Alcohol marketing on digital platforms is algorithmic and data-driven

Early forms of online display advertising enabled marketers to use ‘cookies’ placed in users’ web browsers to track and target them (Turow, 2012). Digital platforms have developed these forms of targeted advertising into dynamic algorithmic models that are designed to learn the preferences, and vulnerabilities, of consumers (Fisher & Mehozay, 2019, Larsson, 2018).

The targeting models of platforms increasingly draw not just on data that users generate on the platform, but also on data that can be associated with them – often provided from marketers and third-party data providers (Crain, 2018, Mellett & Beauvisage, 2020). In the case of alcohol marketing, data collected through loyalty programs might be matched with social media data to generate models that link purchase patterns with time of day, week or month, mood and social events, and more. Marketers might not be explicitly choosing, or even be explicitly aware, of how a platform is linking up their promotional appeals with particular moments when consumers are receptive or susceptible (Andrejevic, 2020, Kietzmann et al., 2018).

Marketing on digital platforms is a dynamic process of training predictive models that assemble audiences, configure ads, and optimise the relationships between them. This is not necessarily a process where an advertisement is created and then ‘micro-targeted’ at pre-defined audiences. Within the advertising model of digital platforms Facebook’s advertisers go beyond paying for or measuring reach or exposure. They use analytics
dashboards, beacons and pixels to track the actions of consumers after being exposed. This data is used to ‘tune’ both the audiences and the advertisements toward certain actions – a purchase, a recommendation, a click, a search, a like, a share. The combinations between ads and audiences are automatically generated, tested, and refined by the platform’s advertising model (Facebook, n.d. ‘About dynamic creative’, TikTok, n.d.). The process does not begin with an ad and end with targeted exposure, but rather with more optimized relationships between audiences and ads. We can see some of the artefacts of this process when we look at Facebook’s Ad Library where, for many alcohol brands, there are multiple variations of nearly identical ads. Each variation is compiled by the dynamic creative tool and then targeted at custom and lookalike audiences. The longer an advertiser spends ‘in market’ tuning these categories and creative, the more optimized their engagement becomes.

Example 2: A Facebook Business case study outlines a partnership between the global alcohol producer Diageo and the major Australian alcohol retailer Dan Murphy’s. Diageo and Dan Murphy’s used ‘Facebook’s Collaborative Ads to direct optimized traffic to its retail partner’s website’ (Facebook n.d. ‘Diageo...’).

Collaborative ads are a tool that allow a brand to create ads that draw on a combination of platform, brand, retailer and third-party data sets to find consumers likely to buy their product, and then target them with a direct ‘shop now’ link to a local retailer. In this
case, Diageo used data provided by Dan Murphy’s to ‘optimize the campaign based on the behavior of people who had seen the ads and then clicked through to the retailer’s website. In the first half of the campaign, Diageo used ‘Custom Audiences’ for retargeting people who had browsed the Dan Murphy’s website but not made a purchase, as well as those who had purchased in the past but not recently. Custom and lookalike audience tools enable social media platforms to identify new users that are similar to an already existing set of consumers. A custom audience is built by uploading data about already-existing consumers that the platform then finds and targets. A lookalike audience is created by using already-existing data to train the advertising model to find similar, previously unknown, consumers. Often, lookalike audiences find patterns and connections between current and prospective consumers that marketers were unaware of or that may not be directly related to alcohol consumption.

In the second half of the campaign, the beverage brand broadened its reach using lookalike audiences to connect with a new group of potential customers who had similar interests and demographics as its current user base’ (Facebook n.d. ‘Diageo...’).

Data-driven tools like collaborative ads as well as custom and lookalike audiences might be uniquely harmful to vulnerable consumers of addictive commodities like alcohol. These
tools might learn to identify high-volume consumers and target them with discount products. Vulnerable consumers might be targeted disproportionally simply because targeting tools are trained to find the most susceptible consumers (Gregory, 2019).

3. Alcohol marketing on digital platforms is dark and ephemeral

Alcohol marketing on digital media is potentially ‘dark’ and ephemeral. This means that in a variety of ways platforms make advertising less visible to a broader public. Using new tactics like native and sponsored posts, social media influencers, ephemeral video stories, augmented reality filters and sophisticated algorithms that recommend products, these platforms create alcohol promotions and advertisements that are location-, time-, and context-specific. As a result, a significant amount of alcohol marketing is now only visible ‘below the line’—that is, hidden in the social media feeds of individual users, invisible to those outside the target audience, and not publicly archived. For instance, when an alcohol marketer purchases a sponsored filter on Snapchat, that filter will only be visible to consumers who meet specified demographic criteria in a particular place and time. Filters are software tools that augment the digital appearance of a face or a specific location. Once consumers use the filter to create an augmented-reality selfie and share it with friends, it is only visible to those selected friends for a set amount of time. Or, on Instagram stories, advertisements disappear after a set amount of time and are not archived on any public brand account. Furthermore, the data-driven nature of digital platforms allows marketers to ‘gate’ content so that it can only be seen by their preferred audiences.
Example 3: Budweiser has used sponsored filters on Snapchat as part of its sponsorship of major sporting events like the Super Bowl and the World Cup.

For the Super Bowl, the brand launched an interactive Snapchat game along with Snapchat filters of clinking Bud Light bottles and different geotargeted filters based on the home cities of the winning and losing team.

For the Soccer World Cup, the brand developed sound-activated as well as reactive filters that allowed fans to keep track of match scores and share their reactions to it in real-time through the app. The campaign also extended offline in the form of printed ‘Snapcodes’ on specifically-designed ‘influencer packs’, which provided access to additional and exclusive Snapchat filters (Stewart, 2018).

The ephemeral augmented reality advertising model developed by Snapchat is now common on many platforms. It is significant not only because of its ‘dark’ nature, but also because it challenges the notion of what actually constitutes an advertisement. Brands create ‘sponsored’ filters where users augment their appearance using digital paraphernalia provided by marketers (Author, 2020). In contrast to ‘traditional ads’, these interactive features are shipped unfinished, requiring ‘assembly’ by users who apply filters and lenses to their own images and videos (Author, 2020). Consumers are not targeted with an ad as
much as they are targeted with a task. They refine the targeting strategy of the ads using their local cultural judgment to integrate the brand into their own self-expression and choose which of their peers will appreciate it.

Promotion by nightlife venues on social media is another significant form of below the line promotion. Griffin et al. (2018) found that venues posted more frequently than brands, and that young people were more likely to follow them on social media to plan and document drinking practices (Atkinson et al., 2017; Griffin et al., 2018). Venues also recruit promotional laborers from their own target audience who they pay in cash or informal rewards to promote the venue through their own social networks (Author, 2016). Venues promote nightlife experiences of which alcohol is usually an essential part, often using the peer-to-peer networks of consumers themselves. Again, this kind of marketing is ‘native’ and untraceable, flowing through peer networks and often only indirectly references alcohol brands or consumption.

4. Alcohol marketing on digital platforms is enmeshed in the real-world

The most common touchpoint between consumers and digital media platforms is the smartphone (Author, 2020). Alcohol marketers generate content and engagement around their brands on social media platforms by interacting with consumers at cultural events, in public places, and retail and service settings (Author, 2017, Author, 2018, Lyons et al., 2016). For example, at music festivals brands create themed venues where consumers are encouraged to create and circulate images and videos through Instagram and Snapchat that weave brands into the stories they tell about themselves (Author, 2016).
These engagements in real world spaces are a source of data. The images created by consumers can be clustered and classified by machine vision systems in order to identify features within the images themselves (like faces, landmarks and brand logos) that enable the advertising model to identify connections in their social networks and preferences for particular brands and cultural experiences (Cluep, n.d., Dua, 2017, Influencer Sphere, n.d.). The real world begins to function as a ‘beacon’ that links consumers to moments of consumption, and therefore makes them available for marketers to operate on (Awards Analyst, 2020).

Example 4: The industry’s view that alcohol brands need to create real-world activations is paradigmatically summarized by the event agency Sense Group: ‘Advertising restrictions, the use of social media and the way people have sensitized to advertising tactics has put pressure on alcohol brands to create innovative, intelligent and memorable marketing strategies. Creating a successful marketing campaign for an alcohol brand is now a matter of activating experience at every touch point’ (Sensegroup, n.d.).

A recent example for the innovative ways in which alcohol brands create immersive, experiential events is Desperados’ ‘Epic House Parties Imagined by You’ campaign. The beer brand invited consumers to imagine party experiences the brand would then realize. One of these parties included for instance a giant robotic octopus serving drinks with its eight arms to shorten waiting time at the bar, custom-built haptic jackets that allowed guests to literally...
“feel the music”, and a robotic hands-free Desperados arm that stops you from spilling drinks on the dance floor (Jardine, 2019).

5. Alcohol marketing on digital platforms is logistical

Alcohol marketing on digital media platforms increasingly integrates the promotional step of delivering an advertisement with the logistical step of organizing a purchase (Constine, 2019). Platforms create a seamless flow from identifying preferences, to exposing consumers to a targeted message, to converting that message into an action to purchase (Adams, 2019). The advertising function of social media platforms are increasingly integrated with purpose-built retail apps and websites. Platforms play a crucial role not just in more fine-grained targeting of consumers, but also in dramatically expanding the availability of alcohol. Platforms integrate data sets produced by the platforms, data brokers and obtained from retailers (like purchase histories) to configure the right combination of promoted product, timing and delivery.

Example 5: A person is chatting with a friend on Facebook Messenger about their day and suggests they might have a glass of wine when they get the kids to bed. This triggers an ‘ad preference’ to be assigned to them in Facebook’s ad model. Later in the evening they see a targeted ad in their Instagram home feed from a local alcohol chain retailer. The ad is automatically generated to incorporate an image of a product they have previously purchased. If they click the ad, they can purchase the product and have it delivered to their
home that evening. Most digital platforms enable in-app purchases for home delivery.

The three images above are taken from the Facebook Ad Library for BWS, an Australian liquor retail chain. Each ad features a product and a ‘shop now’ button integrated into the Facebook or Instagram app. They illustrate how the same ad template is used, with different alcohol products inserted. Facebook’s Ad Library explains that these ads use ‘dynamic creative, a process whereby advertisers upload multiple image and text options and the best-performing combination for the audience is automatically created.’

The Facebook Ad Library shows only a selection of examples. There is no way to know how many variations are being used on the platform by the retailer.
Researching and regulating alcohol marketing on digital platforms

Digital platforms and marketers are reimagining how media work as technologies for organizing markets. The assumption that digital platforms simply offer more customized targeting (i.e. refined exposure) of pre-produced ads to consumers no longer holds. Much of the activity of ‘doing’ marketing on digital platforms is not contained only in the creation of the ad and targeting of consumers, but in the collection and use of data to experiment with, and refine, engagement with consumers.

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A platform-centric view of alcohol marketing on digital media pays attention to the interplay between the creation and targeting of advertising, consumer participation in creating content and translating their lived experience into data, and the training of models that enable marketers to optimize the targeting of ads and integrate them with purchase decisions (see Figure 1). Facebook and Google have extraordinary market power not only because they capture audience attention and dominate advertising markets, but because they have built an infrastructure that captures vast amounts of data and uses that data to train and optimize algorithmic models. They have created a form of marketing that is deeply enmeshed in everyday life and that shapes public culture in profound ways, yet it is uniquely unavailable to public scrutiny.
Current approaches to regulation tend to specify what kinds of messages can be used in advertisements, where they can be published, at what time, and so on. However, alcohol marketers have arguably grown savvy to the exposure-based self-regulatory codes. While the initial years of digital alcohol marketing saw brands breach their own regulatory codes, or act as if they did not apply to digital platforms, we now largely see a ‘letter-of-the-law’ compliance with them (Lindeman et al., 2019). But we cannot tell if they comply with the rules in their below-the-line activities.

Digital marketing is substantially organized around the collection and use of data, but these aspects are not covered by most regulatory codes. The power of the marketing model digital platforms have created is arguably located not in the content of the ads but in the collection of, and experimentation with, data. The process that causes harm and needs regulating is data-driven optimization of consumer attention, engagement and behavior, not just the symbolic messages in the ads or the sharing of alcohol-related content on social media.

While platforms provide individuals and marketers some tools for controlling data and targeting, new frameworks are required that include systematic monitoring of the activities of marketers on platforms, the tools and data they use, and the effect of their practices on vulnerable consumers.

Industry self-regulatory codes based on public complaint are untenable when alcohol advertising is not open to public scrutiny. Platform tools for reporting content reduce scrutiny to individual preference rather than community standards. Frameworks are required that make the activities of marketers – the content they produce and the use of data – open to systematic monitoring. As a first step, regulators need to insist that all alcohol marketing is disclosed in the public domain, including use of ad preferences and
audience-building tools, reach and engagement, partnerships with influencers and peer-generated content.

Systematic monitoring is also crucial to the development of a research agenda that would produce an evidence-based understanding of digital alcohol marketing on platforms, how it works on consumers, and the harms that it causes. Without platforms being required to provide more transparent access for researchers to their marketing models, the evidence base on the harm caused by this form of alcohol marketing will remain significantly limited.

In the meantime, researchers will need to focus on developing tools that purposefully work around platforms’ Terms of Service to scrape content and data, or recruit consumers to monitor the advertising they are exposed to. Both methods are vulnerable to platform changes and are resource intensive, and both have limited ability to investigate the data-driven optimization of relationships between marketers and consumers.

Systematic monitoring would enable proper scrutiny but not in itself reduce harm.

Regulatory codes also need to create rules about the use of data-optimized engagement with consumers. Regulatory approaches need to conceptualize marketing as a dynamic data-driven and participatory process, rather than as the publication and targeting of specific, self-contained advertisements. We need to seriously consider if it is possible to have a data-driven form of marketing that does not disproportionality harm vulnerable consumers of addictive commodities.

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