



Annual Report 2010



8 Upper Fitzwilliam Street, Dublin 2.

Telephone: (01) 676 4876

Fax: (01) 611 4834

Email: clearance@ccci.ie



THE BOARD OF CENTRAL COPY CLEARANCE IRELAND

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CHAIRMAN'S REVIEW

On becoming Chairman of CCCI in early 2010, an obvious first priority was to understand the role and position of CCCI in the tapestry of alcohol regulation in Ireland. Central Copy Clearance Ireland (CCCI) was established in 2003 by the major alcohol brand companies following extensive discussions with the Dept of Health and against the backdrop of widely expressed concern about the problem of under-age drinking and the possible role of advertising in influencing such behaviour. Concerned about this issue, the alcohol companies agreed with the Dept of Health a set of Codes to regulate alcohol marketing communications and further to fund a then new initiative to pre-vet alcohol marketing communications prior to their publication to ensure their compliance with the Codes as agreed. This new initiative led to the creation of the CCCI, which, while funded by the alcohol sector, would, as a matter of principle, operate independently of the sector.

The marketing and promotion of alcohol is undertaken by a range of commercial interests at various stages of the value chain. These include alcohol producers and importers, distributors and a wide range of retail outlets including pubs, clubs, hotels and off-licences. Collectively the alcohol marketing sector is subject to a considerable array of regulation and legislation. In this regard there are specific legal regulations for premises licensing and alcohol retailing; the overall advertising industry Code as overseen by the Advertising Standards Authority of Ireland; the Alcohol Marketing Communications and Sponsorship Codes as agreed with the Dept of Health which govern brand communications; the Retail Code as overseen by the Dept of Justice; the broadcast codes of the Broadcasting Authority of Ireland; and the monitoring of the placement of advertising, managed by the AMCMB which reports to the Dept of Health.

CCCI's remit, as just one part of this overall regulatory process, is to review all brand communications before they are placed in Irish media. Intending advertisers must submit their proposed communications to CCCI to seek approval for their publication/broadcast. Without CCCI approval, the advertisements will not be published or broadcast. This is because the main media, as part of the agreement to manage alcohol brand advertising, have enjoined in this regulatory process and insist that proposed advertisements obtain a CCCI clearance certificate as a precursor to their publication. This is an industry agreed pre-emptive intervention in the advertising production and publication process which reduces the prospect of a breach of the agreed Code and in so doing contributes to the broad social objective of reducing exposure to potentially inappropriate advertising.

Compliance with the Codes has been at a very high level since the establishment of the CCCI. This compliance can be attributed to the sector's support for the initiative as well as other factors such as the education and training programmes undertaken within individual alcohol companies and within the advertising and media sectors to ensure understanding of the process, its inherent workings and the requirements for adherence. Since the inception of the CCCI there has been considerable cumulative learning, which has ensured continuing improvements in compliance levels.



It is against this background that CCCI can report that for 2010, the overall compliance rate on all submissions made to CCCI was 94.64% (that is, 5.36% did not comply). The compliance rate in 2009 had been 95.9%. These statistics cover all submissions made to CCCI – both final and interim submissions. Interim submissions are either preliminary concepts for an advertisement or are those submissions that do not meet the Code standards and are referred back to the advertiser for correction. Once changed these are re-submitted to CCCI for final approval. At this stage, the final submissions approval rate increased to 97.64% and the remaining 2.3% simply did not get published because they still failed to meet the Code requirements. The total number of submissions to CCCI in 2010 amounted to 3,618, which represented a drop of just over 200 from the 2009 figure of 3,827.

This scale of submission and the compliance level clearly indicates the commitment of the alcohol brand companies to the Codes. The successful application of these Codes also depends on the pro-active commitment of the different media (print, broadcast, outdoor, etc). Indeed against the background of the current economic environment and reduced advertising revenue streams, the contribution of the media must be recognized as significant.

Finally, I wish to pay tribute to my fellow board members who bring to the oversight process a valuable range of relevant business experiences. I also wish to thank our Copy Clearance managers for the professional approach they bring to the assessment process. And lastly, I want to record my appreciation to the Institute of Advertising Practitioners in Ireland and the Association of Advertisers in Ireland for providing the ongoing management and administrative support to enable CCCI to operate to the highest standards.

Prof Tony Meenaghan
Chairman

OPERATIONAL OVERVIEW

Operational Overview

The total number of submissions presented to CCCI in 2010 was 3,618, as compared to 3,827 in 2009. The number does not include support material submissions which a company or agency would provide as a way of explaining their ad proposals, though the CCCI process would also involve examining them. Otherwise, the total number includes all versions of a proposed advertisement, initial and final. This reflects the fact that at times, companies will submit initial ad concepts so as to get guidance on their acceptability or otherwise in terms of their likely compliance with the agreed Codes of Practice.

Of the 3,618 total ad submissions, 2,460 were final submissions, approximately two-thirds of the total submitted.

The total number of ads approved was 3,424 (94.6%) while those not approved were 194 ads (5.4%). The number of non-approvals was an increase of 36 on the 2009 figure. Two categories of alcohol products, Ready to drink and Liqueurs, though relatively small in overall numbers, showed a higher proportion of non-approvals than did spirits, wines or beers. Interestingly, the categories showing the higher non-approval rates showed a higher proportion of ads originating/designed overseas than those designed or originating in Ireland. This indicates a greater awareness by Irish agencies of the Codes and regulations in force here than do the ad originators outside Ireland (whose ads may be broadcast electronically directly into Ireland on non-Irish TV channels or digital media). The main alcohol brands in Ireland participated in specially designed training courses for their staffs to ensure that they are properly aware of and familiar with the Codes of Practice. These courses are delivered by people experienced in the Codes and the training is organized through the Alcohol Beverage Federation of Ireland.

Product Category Totals

Overall, 94.6% of ad submissions in 2010 were approved and 5.4% not approved. This compares with 95.9% and 4.1% respectively in 2009. Ads vetted and not approved by CCCI were not published.

Beer and cider accounted for 2,299 of the total number of ad submissions, or 63.3% of the total. This compared with 70.4% in 2009.

Spirit ads accounted for 934 of the total, equal to 25.8% of the total, as compared to 20.4% in 2009.

Wine ads continue to account for a relatively small proportion of the total ad numbers; they accounted for a total of 130 ads or 3.6% of all 2010 ad submissions, in contrast to 134 ads in 2009, giving them an approval rate of 96.2%. Ready to drink and liqueur ads together accounted for a similar volume of the total submissions in 2010 – 136 ads, 3.8% of the total.

In terms of approvals and non-approvals, beer and cider submissions had a 2010 approval rate of 94.7%, spirits had a 96.6% approval rate, wine a 96.2% approval rate, and RTDs/liqueurs an 80.1% approval rate.

As noted previously, there are variations in approval rates between Irish-originated ad designs and overseas –originated. This is particularly noticeable in the Beer and Cider category, where Irish design approvals were at 96.3% compared to 87.5% for overseas. Similar patterns show in Liqueurs (Irish-originating 100% approved, overseas 75%) and Ready-to-Drink (100% approval

for Irish originating and 71.6% for overseas). Contacts between CCCI and advertisers and their agencies clearly indicate the wider awareness of the Codes of Practice principles by Irish agencies.

Source-originating and Media Breakdown

Advertising submissions to CCCI have two originating sources – designed in Ireland or designed overseas. Overseas-originating advertisements are usually as part of a wider market or even worldwide marketing strategy than those originating in Ireland.

In 2010, out of a total of 3,618 submissions reviewed by CCCI, some 842 were of overseas origination (23.3%, compared to 21% in 2009), with 2,776 or 76.7%, originating in Ireland. 89.3% of the overseas submissions were approved while 10.7% were not approved. 96.3% of the Irish submissions were approved and 3.7% were not approved.

There have been changes in recent years in the media channels being used by advertisers. In 2010, the media category accounting for the greatest individual proportion of submissions was Outdoor with a total proportion of 29.5% (31% in 2009). Internet advertising accounted for 21.9% in 2010 (17% in the previous year) while TV advertising accounted for 17.9% (11% in 2009). Print advertising (magazines and newspapers) accounted for 14.1% in 2010, as compared to almost the same figure, 14% in 2009.

Some of these change patterns have seen ups and downs over recent years, Outdoor being a particular example – 29.5% in 2010, 31% in 2009, 42% in 2008 and 31% in 2007. Internet was 21.9% in 2010, 17% in 2009 and 10% in 2008.

It should be noted that CCCI has no role in assessing ads which are broadcast directly into Ireland or are contained in magazines or newspapers which are published outside of Ireland but retailed in Ireland. Around 80% of magazines featured on Irish retail bookshelves are published outside Ireland and directly imported.

Review and summary

CCCI's specific brief is to assess advertising and marketing communications content for alcohol brand advertising, and to ensure that such advertising content complies with the advertising codes. The main codes that it adjudicates proposed advertising for are the Commercial Communications Codes of the Broadcasting Authority of Ireland and the Advertising Standards Authority of Ireland Codes of Practice.

The Alcohol, Marketing and Sponsorship Codes were due for review by the parties to it in June 2010 but this was deferred by the Dept of Health pending other reviews it was undertaking. As of the end of 2010, those reviews have not been completed and CCCI continues to monitor advertising content in line with the existing code.

CCCI is quite a unique operation in the manner in which it is structured, how it operates and how it is funded – and retains a fully independent role in how it delivers its service. It is quoted at EU level in very positive terms of how a regulatory approach can be developed and adopted, and it is described as a model for other countries.



Central Copy Clearance Ireland - Location and Medium Report 1 January 2010 – 31 December 2010

Location: Domestic

Medium	Approved		Not Approved		Totals	
	2010	2009	2010	2009	2010	2009
Outdoor/Ambient	833 23.0%	1000 26.13%	13 0.36%	38 0.99%	846	1038
Internet	688 19.0%	528 13.80%	11 0.30%	14 0.37%	699	542
TV Cinema	462 12.80%	314 8.20%	37 1.0%	21 0.55%	499	335
Print	355 9.80%	745 19.47%	26 0.72%	19 0.50%	381	764
Radio	196 5.40%	296 7.73%	16 0.40%	12 0.31%	212	308
Other/POS	138 3.80%	26 0.68%	1 0.02%	10 0.26%	139	36
Totals	2672 73.90%	2909 76.01%	104 2.80%	114 2.90%	2776	3023

Location: Overseas

Medium	Approved		Not Approved		Totals	
	2010	2009	2010	2009	2010	2009
Outdoor /Ambient	272 7.50%	325 8.49%	24 0.16%	6 0.16%	296	331
Internet	104 2.90%	111 2.90%	3 0.08%	5 0.13%	107	116
TV	194 5.30%	97 2.53%	59 1.60%	15 0.39%	250	112
Print	154 4.30%	185 4.83%	3 0.08%	14 0.37%	157	144
Radio	6 0.20%	30 0.78%	1 0.03%	4 0.10%	7	34
Other/POS	23 0.60%	12 0.31%	n/a n/a	n/a n/a	23	12
Totals	752 20.80%	760 19.86%	90 2.50%	44 1.15%	842	804
Grand Total	3424 94.60%	3669 95.87%	194 5.40%	158 4.13%	3618	3827

Domestic and overseas refers to the location where the advertising originates.
All percentages relate to the report grand total figure for the year.



Central Copy Clearance Ireland - Medium Totals Report

1 January 2010 - 31 December 2010

Decision: Approved

Medium	2010		2009	
Outdoor	1035	28.61%	1148	30.00%
Internet	792	21.89%	639	16.70%
TV	649	17.94%	395	10.32%
Print	509	14.07%	521	13.61%
Radio	202	5.58%	326	8.52%
POS	110	3.04%	2	0.05%
Ambient	70	1.93%	170	4.44%
Other	51	1.41%	36	0.94%
Cinema	6	0.17%	4	0.10%
Outdoor/Print	n/a	n/a	409	10.69%
TV/Cinema	n/a	n/a	12	0.31%
Outdoor/Ambient	n/a	n/a	7	0.18%
Total	3424	94.64	3669	95.87%

Decision: Not approved

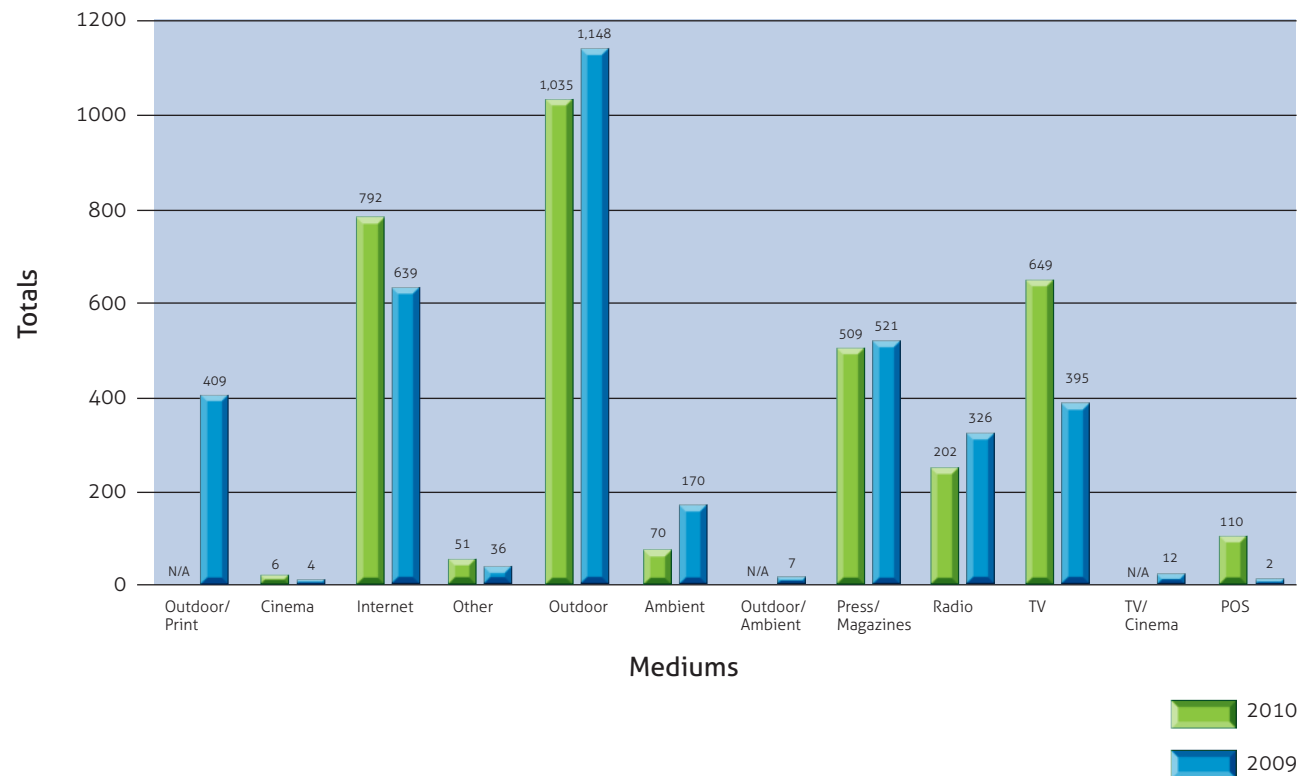
Medium	2010		2009	
Outdoor	34	0.94%	42	1.10%
Internet	14	0.39%	19	0.50%
TV	96	2.65%	34	0.89%
Print	29	0.80%	20	0.52%
Radio	17	0.47%	16	0.42%
POS	1	0.03%	3	0.08%
Ambient	3	0.08%	2	0.05%
Other	n/a	n/a	7	0.18%
Outdoor/Print	n/a	n/a	13	0.34%
TV/Cinema	n/a	n/a	2	0.05%
Total	194	5.36%	158	4.13%
Grand Total	3618	100%	3827	100%

All percentages relate to the Report Grand Total

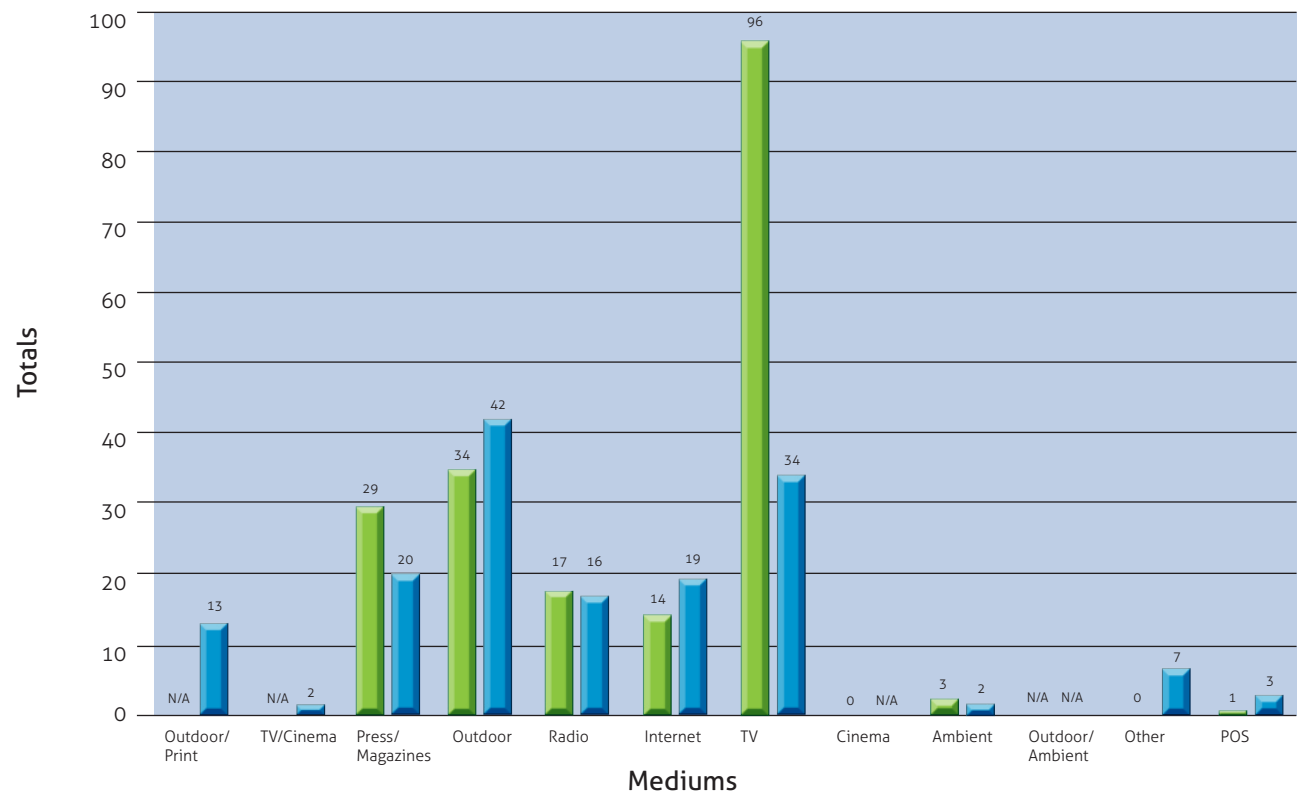
Central Copy Clearance Ireland - Medium Totals Report

2009 vs 2010

Decision: Approved



Decision: Not approved



Central Copy Clearance Ireland - Location and Category Report

1 January 2010 - 31 December 2010

Product	Location	Approved		Not Approved					
		2010	2009	2010	2009				
Beer/Cider	Domestic	1,822	96.3%	2,141	96.53%	70	3.7%	77	3.47%
Beer/Cider	Overseas	356	87.5%	455	93.62%	51	12.50%	31	6.38%
Totals	Beer/Cider	2,178	94.74%	2,596	96.01%	121	5.26%	108	3.99%
				67.83%				2.82%	
Liqueur	Domestic	29	100%	7	100.00%	0	0%		
Liqueur	Overseas	30	75%	25	100.00%	10	25%		
Totals	Liqueur	59	85.51%	32	100.00%	10	14.49%		
				0.84%					
RTD	Domestic	7	100%	10	76.92%	0	0%	3	3.08%
RTD	Overseas	43	71.67%	83	100%	17	28.33%		
Totals	RTD	50	74.63%	93	96.88%	17	25.37%	3	3.12%
				2.43%				0.08%	
Spirits	Domestic	630	96.63%	574	96.31%	22	3.37%	22	3.69%
Spirits	Overseas	272	96.45%	162	94.74%	10	3.55%	9	5.26%
Totals	Spirits	902	96.57%	736	95.96%	32	3.43%	31	4.04%
				19.23%				0.81%	
Wine	Domestic	80	94.12%	85	91.40%	5	5.88%	8	8.60%
Wine	Overseas	45	100%	38	92.68%	0	0%	3	7.32%
Totals	Wine	125	96.15%	123	91.79%	5	3.85%	11	8.21%
				3.21%				0.29%	
Other	Domestic	104	93.69%	92	95.83%	7	6.31%	4	4.17%
Other	Overseas	6	75%	5	83.33%	2	25%	1	6.67%
Totals	Other	110	92.44%	97	95.10%	9	7.56%	5	4.90%
				2.53%				0.13%	
Grand Total		3,424	94.64%	3,669	95.87%	194	5.36%	158	4.12%

Percentages relate to approvals / non-approvals by product category

THE DEVELOPMENT OF CENTRAL COPY CLEARANCE IRELAND

Central Copy Clearance Ireland Ltd (CCCI) is a separate independent company with its own board of directors, and is not a subsidiary of any other company or organisation. It was established in 2003, and was an initiative proposed following extensive discussions between the Association of Advertisers in Ireland (AAI), the Institute of Advertising Practitioners in Ireland (IAPI) and the main alcohol producing and marketing companies at the time. They presented it as a positive industry response to concerns expressed by the Department of Health and Children about the content of some advertising.

The rationale behind it was that the alcohol companies were keen to demonstrate their commitment to socially responsible marketing and promotion of their products. They agreed to set up an independent body, which would be

funded by them but in which they would have no board representation or management role, which would act independently to assess the compliance of their proposed advertising campaigns with the Codes of Practice in force, and that they would accept the adjudications of the CCCI in the matter.

This arrangement was further strengthened by the involvement of the major media as delivery partners for the CCCI process. Because advertising would appear in print, billboard or broadcast media, it was important to engage the support of these channels in effectively implementing the CCCI process. The result of this multi-party arrangement is that all advertisements must carry the CCCI approval and have a CCCI certification number which has to be quoted and presented to the relevant media when

the advertiser is seeking to have an advertisement placed for publishing – otherwise it is not accepted by the media for publishing.

Each individual piece of advertising is pre-vetted. This can be copy, images or even concepts. The vetting, often at all stages of its production, is done by a group of managers who are experienced in the industry and trained in the Codes of Practice. Pre-vetting applies to all advertisements made in Ireland or developed internationally, if they are to be run in the Irish media.

The CCCI board is made up nine members, four each of whom are nominated by the Association of Advertisers in Ireland and the Institute of Advertising Practitioners in Ireland respectively, plus an

independent Chairperson. None of the nominees come from the alcohol industry.

Administration of the CCCI service is jointly provided by the AAI and IAPI.

The service also allows for an Appeals process so that an advertiser who might not be in agreement with the decision on their advertisement by the CCCI's professional copy clearance managers, can appeal for a review by the Appeals Committee. This Committee comprises of the Chairperson and two other members of the board.

The model developed for CCCI demonstrates how self-regulation in the area of alcohol advertising can work effectively.

Because advertising would appear in print, billboard or broadcast media, it was important to engage the support of these channels in effectively implementing the CCCI process.

