



8 Upper Fitzwilliam Street, Dublin 2.  
Telephone: (01) 676 4876  
Fax: (01) 611 4834  
Email: [clearance@ccci.ie](mailto:clearance@ccci.ie)



## THE BOARD OF CENTRAL COPY CLEARANCE IRELAND

**Chairman:** Prof Tony Meenaghan

### INSTITUTE OF ADVERTISING PRACTITIONERS IN IRELAND

**Board Nominees:** Gavin Byrne  
Joe Clancy  
Dave Harland  
Sean McCrave (retired Dec. 2011)

### ASSOCIATION OF ADVERTISERS IN IRELAND

**Board Nominees:** Fiona Curtin  
Dara McMahon  
Ed McDonald

## CHAIRMAN'S REVIEW

CCCI again had a busy year in 2011, handling and considering a total of 3,844 submissions. Of these, 2,803 were final submissions, the balance representing various interim iterations of what would become final advertising communications. The distinction between 'interim' and 'final' submission is important to note in terms of the work of CCCI, as we provide considerable early stage advice on the content of a proposed ad to ensure that it complies with the relevant Codes of Practice. CCCI recorded an ad approval rate of 92.8% for 2011, compared to 94.6% for 2010, but most non-approvals arose early in the review process and thus (in that submitted state) never got to the final production stage as companies accepted the CCCI assessments and made the necessary adjustments to their communications proposals. This high approval rate is subsequently reflected in the fact that the ASAI receives few complaints about alcohol advertising and rarely is required to adjudicate on them. This reality underlines an important point about the fundamental role of the CCCI, which is to ensure, as far as possible, that alcohol advertising which fails to comply with the approved Codes of Practice simply does not get published or broadcast.

A particularly interesting point to note in this year's report is that the internet has, for the first time, emerged as the leading media communication channel for alcohol marketing in Ireland, accounting for almost 30% of ad submissions. Internet growth and the emergence of 'new media' are developments which CCCI has been monitoring over recent years as these new media have developed as an integral component of today's media landscape. The technology underpinning this new landscape is rapidly changing and the increasing penetration of new media now demands that they be regarded as 'normal' media communication channels alongside TV, radio, print etc. Like many advertising regulatory bodies in other jurisdictions, CCCI is adapting to the reality of this rapidly emerging medium in order to understand the nature and scale of its usage for marketing and advertising purposes and to bring relevant communications in this new media frontier within its regulatory ambit. As such we are in regular contact especially with the Advertising Standards Authority of Ireland to determine the aspects of new media communications where the relevant Codes of Practice will apply and how code-compliant advertising may appear in the wide range of online settings.

CCCI regularly meets with a range of external organisations including bodies such as the ASAI, ABFI (the Alcohol Beverages Federation), MEAS, Responsible Retailing of Alcohol Ireland and individual alcohol brand companies to review current developments in alcohol marketing, and to inform one another on issues arising. Such learning and cooperation underlines the fact that these organisations all share the same general concerns about the problems of alcohol misuse in our society

and in particular about the problem of under-age drinking. A particular focus for CCCI in its assessment of marketing communications is to ensure that they are designed for their proper target audiences and are not targeted at children. In this regard, we are very conscious of the wider debate in our society on the need for greater responsibility in relation to alcohol consumption and the dangers of its misuse. The past couple of years have seen extensive reviews of alcohol marketing in an Irish context, most notably the National Substance Misuse Strategy Group under the auspices of the Dept of Health and the Oireachtas Committee on Health and Children, whose emerging reports are currently being considered by a range of relevant organisations including the CCCI.

In implementing the work of CCCI, we are extremely grateful to the main media practitioners for their vital role in ensuring that proposed alcohol advertisements have been pre-vetted to ensure advance compliance with the Codes of Practice. This is achieved by their insistence that prior to the placement of an alcohol advertisement in their media outlets, the submission of the advertisement to a media channel is accompanied by a valid CCCI clearance certificate number. This is an essential role in the vetting process and we appreciate the co-operation of the media channels which is critical to ensuring the success of the overall process.

We will continue to closely examine all proposed alcohol marketing communications submitted to us to ensure that they meet required standards. This requirement is more challenging as media channels evolve to reflect the changing communications technology in the world we live in. This challenge is especially true in the online environment where alcohol-related communications can originate from any jurisdiction and can be changed and adapted with relative ease and speed.

Finally, I wish to record my thanks to all of those involved in the overall CCCI process who ensure that its work is carried out in an effective and conscientious manner – thank you to the members of the CCCI Board who give their time voluntarily, to the Clearance Managers for the insights and experience which they bring to the vetting process, to IAPI and AAI for their time and resources in managing the practical aspects of running the CCCI, and to the alcohol brand companies and their various agencies for their appreciation of the independent status of CCCI in undertaking its important work.

**Tony Meenaghan**  
Chairman



## OPERATIONAL OVERVIEW

### General Review

The total number of submissions considered by CCCI in 2011 was 3,844, up slightly on the 2010 figure of 3,618. The total number includes all versions of a proposed advertisement, initial and final. This reflects the fact that companies may submit initial ad concepts, designs or preliminary creative scripts in order to be guided by CCCI on their acceptability in terms of their compliance with the relevant Codes of Practice, and these may represent different iterations of the ultimate advertisement communication. Consequently, the number of actual advertisements is less than the total number of submissions. The above numbers do not include support material submissions which a company or agency would submit as a way of explaining or expanding on their ad proposals, though CCCI would also examine them. In addition to the vetting and advisory process, CCCI met frequently throughout 2011 with representatives of the drinks industry and individual drinks companies to explain the Codes and its approach to assessing proposed marketing communications. To ensure a commonality of understanding, CCCI also regularly consulted with the Advertising Standards Authority of Ireland and through it, with the Alcohol Marketing Communications Monitoring Body to discuss issues.

The number of final submissions to CCCI accounted for 2,803 of the 3,844 total number of submissions reviewed and assessed by CCCI. The practice of examining preliminary advertising campaign concepts and content, before they go on to final design, assists companies and agencies in being aware of what might not be deemed to be acceptable and why, and in turn helps them to minimise potentially wasteful time and cost in developing a campaign that might not be approved.

The total number of submissions approved was 3,568, an approval rate of 92.8% with 277 (7.2%) not approved and therefore not published. This compares with a 94.6% approval and 5.4% non-approval rate for 2010.

As with 2010, it was notable that in the Beer and Cider category, for example, the non-approval rate for overseas-originating advertising for the Irish market was almost three times the rate for Irish-originating advertising (15.6% against 5.4%). This was also a notable feature in wine advertising where overseas-originating ads had a non-approval rate of 41.7% though it should be noted that this was based on a relatively small total number of submissions (only 12).

### Product categories

Alcohol products are divided into different categories which helps to better identify patterns and trends. Beer and Cider accounted for 2,584 submissions, 67.2% of the total submissions, with a non-approval rate of 7.7% for them. Spirit ads accounted for 815 submissions (21.2%) of the total – this was down from the 2010 level of 934 and 25.8% respectively. The overall approval rate for spirit ads was 94.1% and 5.9% non-approval, compared to 96.6% and 3.4% respectively in 2010. The total number of wine ad submissions in 2011 was 166 compared to 136 in 2010 – the overall approval rate in 2011 was 89.8%, this rate being largely a reflection of the proportion of overseas-originating ads which were rejected by CCCI.

Liqueurs had a 100% approval rating for the 42 submissions in 2011 – in 2010 there had been 69 liqueur ad submissions with an approval level of 85.5%.

There was a total of 85 submissions for Ready-to-drink (RTD) products in 2011 with 91.8% of them being approved; 78 of the 85 RTD submissions originated overseas.



### Source-origination and media channels

Of the 3,844 submissions to CCCI for pre-vetting in 2011, 2,778 (almost three-quarters) originated in Ireland through Irish-based companies and agencies – 72.3%. The balance, 1,066 (27.7%), originated in overseas centres, including design by overseas-based agencies, which generally tend to be part of a wider world advertising campaign for the brand or product concerned. The number and proportion of overseas-originating ads in 2011 were up on 2010 – 2010 had seen 842 ads (23.3% of the total) coming from overseas. The proportion of overseas ads which were not approved showed a year-on-year increase from 2.5% to 3.2% between 2010 and 2011. The non-approval rates for Irish-originating ads rose from 2.9% to 4.1% from 2010 to 2011.

Irish-originating advertising submissions which were approved, accounted for 68.2% of the overall total number of submissions while non-approvals accounted for 4.1% of the total. Overseas-originating submissions which were approved accounted for 24.6% of the total submissions while overseas non-approvals accounted for 3.2% of the total submissions.

2011 saw the Internet emerge as the primary advertising medium, accounting for 29.6% (1,139) of the approved ads and 1.7% (66) of the non-approvals. In second place was Outdoor, which accounted for 899 of the approved ads (23.4%) and 75 (2.0%) of the non-approved ads. Print advertising accounted for 16.5% (636) of the approved ads and 0.8% (32) of those not approved. TV was in fourth place with 11.9% (456) of the approved ads and 2.1% (80) of the non-approved.

This pattern reflects the continuing fast-growing position of digital/online technology in society generally and its increasing range of applications. As noted for 2010, CCCI has no role in assessing ads which are broadcast directly into Ireland from other jurisdictions or which are contained in print media published outside Ireland and directly imported.

### Summary

CCCI's brief is to assess and pre-vet advertising and marketing communications content for alcohol brand advertising being published or broadcast in Ireland, to ensure that it complies with relevant Codes of Practice, the principal of which are the Codes of the Advertising Standards Authority of Ireland. Advertisers must also comply with codes such as those of the Broadcasting Authority.

Other codes, overseen separately from the CCCI process, also apply to aspects of alcohol marketing and advertising for retailers, off-licences, licensed premises and mixed retail outlets.

Another code of particular relevance to alcohol brand companies relates to sponsorship and matters such as where alcohol advertisements are placed, and this is overseen by the Alcohol Marketing Communications Monitoring Body. This is the Alcohol Marketing Communications and Sponsorship Code of Practice as agreed between the Dept of Health, the Association of Advertisers in Ireland, the Institute of Advertising Practitioners in Ireland and the Alcohol Beverage Federation of Ireland. This Code was 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 doing.

CCCI is recognised as being a unique operation in how it is structured and functions and how it is funded. It operates as a totally independent organisation in carrying out its role and the pre-vetting service it provides. It is frequently referred to at EU level as an example of how industry can develop an advanced form of self-regulatory practice.



### Central Copy Clearance Ireland - Location and Medium Report 1 January 2011 – 31 December 2011

**Location:** Domestic

Medium	Approved		Not Approved		Totals	
	2010	2011	2010	2011	2010	2011
Outdoor/Ambient	833 23.0%	589 15.3%	13 0.36%	44 1.1%	846	633
Internet	688 19.0%	877 22.8%	11 0.30%	33 0.9%	699	910
TV/Cinema	462 12.80%	286 7.4%	37 1.0%	31 0.8%	499	317
Print	355 9.80%	491 12.8%	26 0.72%	24 0.6%	381	515
Radio	196 5.40%	258 6.7%	16 0.40%	12 0.3%	212	270
Other/POS	138 3.80%	121 3.2%	1 0.02%	12 0.3%	139	133
<b>Totals</b>	<b>2672 73.90%</b>	<b>2622 68.2%</b>	<b>104 2.80%</b>	<b>156 4.1%</b>	<b>2776</b>	<b>2778</b>

**Location:** Overseas

Medium	Approved		Not Approved		Totals	
	2010	2011	2010	2011	2010	2011
Outdoor /Ambient	272 7.50%	349 10.1%	24 0.16%	31 0.8%	296	380
Internet	104 2.90%	262 6.8%	3 0.08%	33 0.8%	107	295
TV/Cinema	194 5.30%	175 4.5%	59 1.60%	49 1.3%	250	224
Print	154 4.30%	145 3.8%	3 0.08%	8 0.2%	157	153
Radio	6 0.20%	4 0.1%	1 0.03%	n/a n/a	7	4
Other/POS	23 0.60%	10 0.2%	n/a n/a	n/a n/a	23	10
<b>Totals</b>	<b>752 20.80%</b>	<b>945 24.6%</b>	<b>90 2.50%</b>	<b>121 3.2%</b>	<b>842</b>	<b>1066</b>
<b>Grand Total</b>	<b>3424 94.60%</b>	<b>3567 92.8%</b>	<b>194 5.40%</b>	<b>277 7.2%</b>	<b>3618</b>	<b>3844</b>

Domestic and overseas refers to the location where the advertising originates.  
All percentages relate to the report grand total figure for the year (3,844 for 2011).



### Central Copy Clearance Ireland - Overall Medium Totals Report

1 January 2011 - 31 December 2011

**Decision:** Approved

Medium	2010		2011	
Outdoor	1035	28.61%	899	23.4%
Internet	792	21.89%	1139	29.6%
TV	649	17.94%	456	11.9%
Print	509	14.07%	636	16.5%
Radio	202	5.58%	262	6.8%
POS	110	3.04%	84	2.2%
Ambient	70	1.93%	39	1.0%
Other	51	1.41%	47	1.2%
Cinema	6	0.17%	5	0.13%
<b>Total</b>	<b>3424</b>	<b>94.64%</b>	<b>3567</b>	<b>92.8%</b>

**Decision:** Not approved

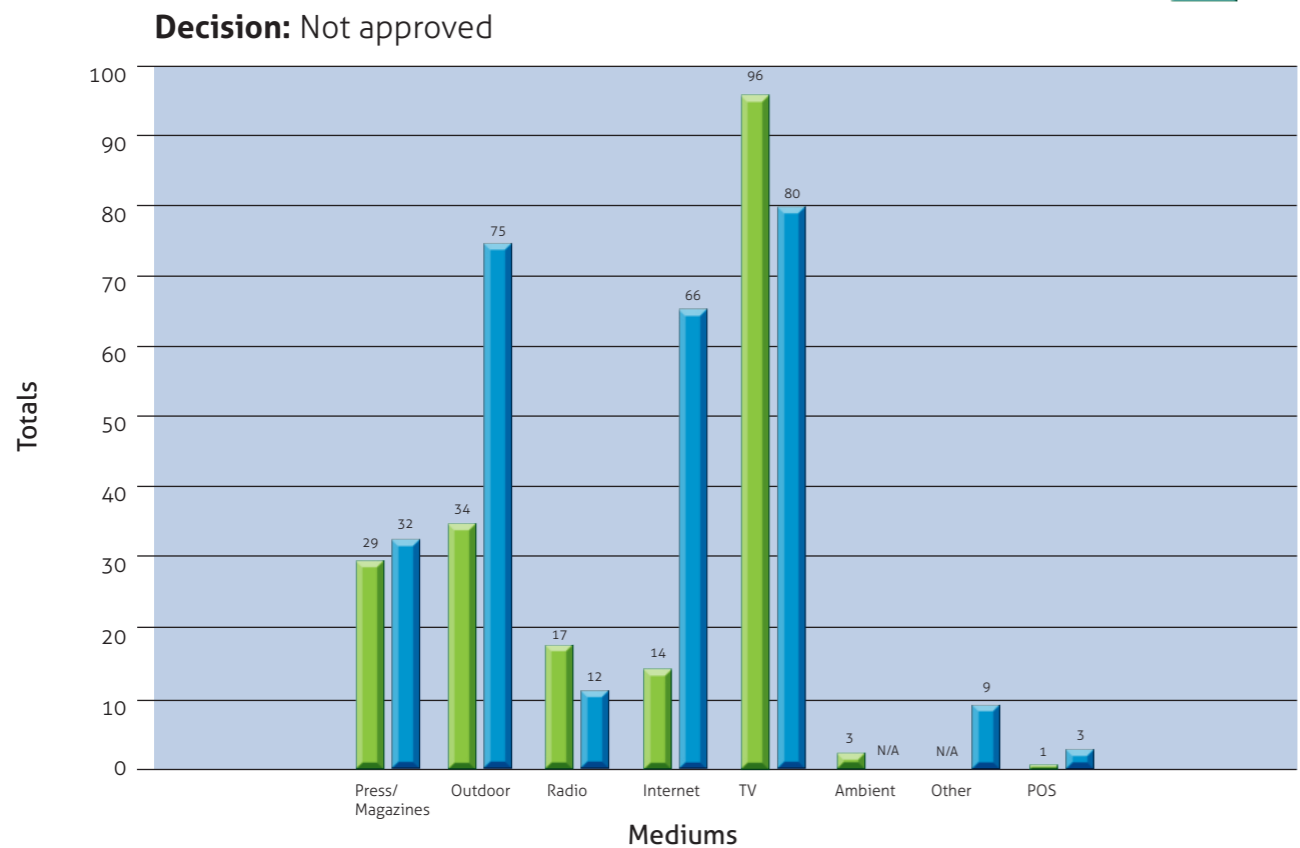
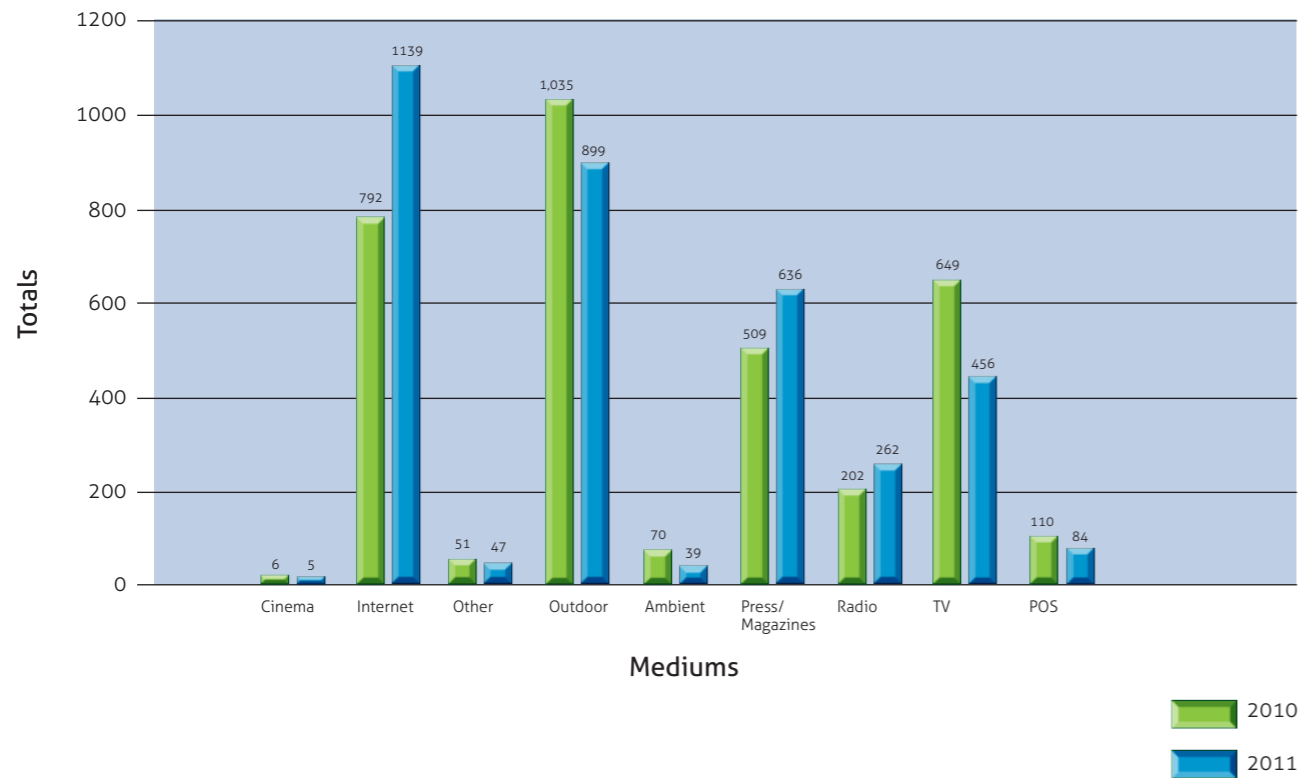
Medium	2010		2011	
Outdoor	34	0.94%	75	2.0%
Internet	14	0.39%	66	1.7%
TV	96	2.65%	80	2.1%
Print	29	0.80%	32	0.8%
Radio	17	0.47%	12	0.3%
POS	1	0.03%	3	0.1%
Ambient	3	0.08%	-	-
Other	n/a	n/a	9	0.2%
Cinema	n/a	n/a	-	-
<b>Total</b>	<b>194</b>	<b>5.36%</b>	<b>277</b>	<b>7.2%</b>
<b>Grand Total</b>	<b>3618</b>	<b>100%</b>	<b>3844</b>	<b>100%</b>

All percentages relate to the Report Grand Total of 3,844 for 2011.

### Central Copy Clearance Ireland - Medium Totals Report

2010 VS 2011

**Decision: Approved**



### Central Copy Clearance Ireland - Location and Category Report

1 January 2011 - 31 December 2011

Product	Location	Approved				Not Approved			
		2010		2011		2010		2011	
Beer/Cider	Domestic	1,822	96.3%	1,904	94.6%	70	3.7%	109	5.4%
Beer/Cider	Overseas	356	87.5%	482	84.4%	51	12.50%	89	15.6%
<b>Totals</b>	<b>Beer/Cider</b>	<b>2,178</b>	<b>94.74%</b>	<b>2,386</b>	<b>92.3%</b>	<b>121</b>	<b>5.26%</b>	<b>198</b>	<b>7.7%</b>
Liqueur	Domestic	29	100%	26	100.00%	0	0%	-	-
Liqueur	Overseas	30	75%	16	100.00%	10	25%	-	-
<b>Totals</b>	<b>Liqueur</b>	<b>59</b>	<b>85.51%</b>	<b>42</b>	<b>100.00%</b>	<b>10</b>	<b>14.49%</b>	<b>-</b>	<b>-</b>
RTD	Domestic	7	100%	7	100%	0	0%	0	0%
RTD	Overseas	43	71.67%	71	91%	17	28.33%	7	9.0%
<b>Totals</b>	<b>RTD</b>	<b>50</b>	<b>74.63%</b>	<b>78</b>	<b>91.8%</b>	<b>17</b>	<b>25.37%</b>	<b>7</b>	<b>8.2%</b>
Spirits	Domestic	630	96.63%	410	93.6%	22	3.37%	28	6.4%
Spirits	Overseas	272	96.45%	357	94.7%	10	3.55%	20	5.3%
<b>Totals</b>	<b>Spirits</b>	<b>902</b>	<b>96.57%</b>	<b>767</b>	<b>94.1%</b>	<b>32</b>	<b>3.43%</b>	<b>48</b>	<b>5.9%</b>
Wine	Domestic	80	94.12%	142	92.2%	5	5.88%	12	7.8%
Wine	Overseas	45	100%	7	58.3%	0	0%	5	41.7%
<b>Totals</b>	<b>Wine</b>	<b>125</b>	<b>96.15%</b>	<b>149</b>	<b>89.8%</b>	<b>5</b>	<b>3.85%</b>	<b>17</b>	<b>10.2%</b>
Other	Domestic	104	93.69%	133	95%	7	6.31%	7	5.0%
Other	Overseas	6	75%	12	100%	2	25%	0	0%
<b>Totals</b>	<b>Other</b>	<b>110</b>	<b>92.44%</b>	<b>145</b>	<b>95.4%</b>	<b>9</b>	<b>7.56%</b>	<b>7</b>	<b>4.6%</b>
<b>Grand Total</b>		<b>3,424</b>	<b>94.64%</b>	<b>3,567</b>	<b>92.8%</b>	<b>194</b>	<b>5.36%</b>	<b>227</b>	<b>7.2%</b>

Percentages relate to approvals / non-approvals by product category (overall combined total of 3,844 submissions for 2011).

## 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.