

# CopyClear

Annual Report 2013





“The alcohol industry must be seen to behave in a socially responsible manner with regard to all of its communications”

## CHAIRMAN'S REVIEW

**THE LAST YEAR** was a busy one for CCCI during which we processed almost 4,000 submissions.

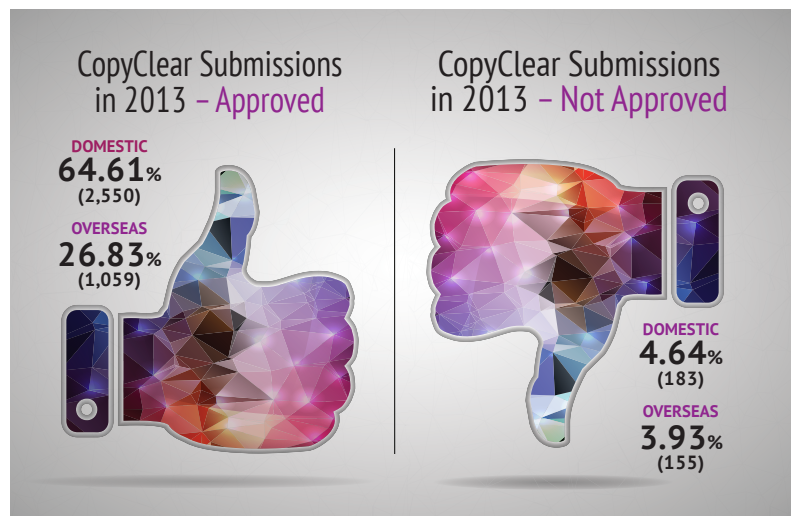
In 2013 we commissioned research among our users to better understand their needs and how we could improve. The feedback was overwhelmingly positive, but our users did ask for more access to our case managers and for a better website.

Two new case managers, Eoghan Nolan and Pamela Selby have joined us and together with Lynne Tracey and Joe Clancy they provide a service on Tuesday and Thursday mornings with a guaranteed same day response to work submitted before 1pm on each of those days.

We launched our new, more user friendly website in March and feedback so far has been very positive.

To coincide with the new website we changed our trading name to CopyClear. While we have retained CCCI as our official name, we believe that CopyClear better reflects the service we provide and the manner in which we provide it.

In March we hosted our second Users Seminar in the RDS. A full house of 135 attendees received presentations from our four case



managers with Catherine Bent acting as facilitator for the day. As with the previous seminar, those who attended found it very useful and we plan to make this a regular event.

In talking with our case managers one of the themes that constantly arises is the level of compliance that exists among alcohol advertisers. They refer to collaboration, to the significant efforts that are made by the alcohol industry to be best in class and to how the industry fully endorses the principles of co-regulation, compliance and best practice.

While this is all very positive, it is not the story that is usually being told in the broader market, which tends to focus on negative, maverick behaviours such as “Neck

Nominations” and “Messy Mondays”.

While the ASAI are seeing an extremely low level of consumer complaints upheld against alcohol advertising (there were none in 2013), the alcohol industry cannot become complacent. Any lack of compliance – whether perceived or real – by any alcohol brand is given a disproportionate value by consumers and by interest groups. So the alcohol industry must be seen to behave in a socially responsible manner with regard to all of its communications. I refer here not just to the letter of the codes, but critically to the spirit of the codes that advertisers have signed up to. At CopyClear we will support our service users in ensuring that this continues to happen. ●

FINTAN COONEY CHAIRMAN

### CHAIRMAN



#### FINTAN COONEY

Fintan is a graduate of UCD and spent over 25 years working in advertising agencies including Dimension, McCann Erickson, Dublin and Chemistry where he was Client Service Director for 13 years.

He is a former board member of IAPI and sits on the board of the St James's Hospital Foundation.

Fintan left his career in advertising in 2012 and now works as a Funeral Director with Fanagans.



#### BARRY DOOLEY

Chief Executive,  
Association of Advertisers in Ireland (AAI).

The AAI champions the freedom to promote responsible and effective marketing communications, and thereby enable businesses to communicate with consumers and citizens.

Barry was a Board Director of Irish International Advertising for 20 years and a Board Director of The Institute of Advertising Practitioners (IAPI) for six years.

He has extensive experience in all matters to do with advertising having worked on many new product launches and on campaigns for most of Ireland's iconic brands.

Barry has worked on the Agency and Client side of the business – he was a product group manager on Bulmers Cider in Showerings Ireland Limited for 3 years.



#### TANIA BANOTTI

CEO of the Institute of Advertising Practitioners of Ireland (IAPI).

IAPI is the representative body for the Irish marketing and communications sector. Members include creative advertising agencies, media agencies and digital specialists.

Previously Tania was CEO of Theatre Forum, the national association for the performing arts and one of the founders and Secretary of the national campaign for the Arts for three years. She was Chief Executive of Screen Producers Ireland, the national association for broadcast film and animation production companies. She also worked for the UN in the Gaza Strip, Palestine for a number of years.



#### DARA MC MAHON

Senior Manager, Strategy Team,  
Ulster Bank.

Dara has over 25 years' experience in marketing related roles. She has held senior roles in Strategy, Marketing & Communications in Ulster Bank over the past 13 years. Previously, Dara worked for Diageo in various marketing roles, including brand management roles for Guinness & Budweiser.

Dara was educated in Trinity College Dublin. She is past President of the Association of Advertisers in Ireland (AAI).



#### ROBERT JORDAN

Head of Beverages and Innovation,  
Glanbia Consumer Foods.

Robert has over 15 years' experience working in FMCG marketing roles. He started his career with the Fosters Group in Australia, and spent four years working with Procter and Gamble - as a Business Manager on its sales & marketing team in Ireland. Since 2004 he has held various roles in Glanbia Consumer Foods, mostly related to marketing Avonmore milk, Ireland's No. 2 grocery brand. His current role also includes managing Glanbia's innovation pipeline, as well as the international launch of the Avonmore brand, across Asia and other markets.

Robert has a B.Sc. in Management from Trinity College Dublin. He has a keen interest in media and current affairs, and has made a number of documentaries for broadcast on Irish television.



#### CAROLINE DONNELLAN

Senior Marketing Manager,  
KBC Bank, Ireland.

Caroline has over 12 years' experience in financial services and is currently Senior Marketing Manager at KBC Bank Ireland. Caroline leads the Marketing and Communications team with responsibility for driving brand awareness and consideration of KBC in the Retail financial sector through the management of advertising, brand strategy, product communications and public relations.

Caroline joined KBC in 2012 from EBS where she held the position of Marketing Communications Manager in EBS. She had responsibility for managing the marketing & communications strategy for EBS and implementing a new customer engagement programme.





#### GAVIN BYRNE

Director of Firstcom.

Prior to joining the board at Firstcom in 2007, Gavin spent over 10 years working with various international advertising networks.

Campaigns devised and produced by Gavin have won dozens of international creative and effectiveness awards and have run in markets as diverse as Russia, New Zealand, Scandinavia, Canada and the UK. He loves the creative process and takes real personal pride in delivering highly effective communications solutions for his national and global clients. Gavin is a member of the Institute of Advertising Practitioners in Ireland and the Institute of Directors.



#### DAVE HARLAND

CEO, Omnicom Media Group Ireland (OMG).

Dave was educated in Methodist College Belfast and Durham University, England. He has over 20 years of experience in media communications and has worked for SSCB:Lintas London, Initiative Media London, and Initiative Media Dublin. Dave left the Interpublic Group in 2005 to join Omnicom Media Group launching OMD, and subsequently, in 2008, PHD. He is responsible for group direction and performance.

Under Dave's leadership as CEO, OMG has matured into a company four times its original size and the fastest growing media group in Ireland. He has also forged a role as a leader in developing innovative media and content partnerships with media owners.



# CopyClear

## MANAGERS



**LYNNE TRACEY**

Lynne Tracey started out in the Advertising Industry in a salmon-colour linen suit and a black briefcase – well it was the 1980s and that’s her excuse. Despite the sartorial lapse, Lynne managed to find work and spent her career working in Agencies such as Campaign Advertising and McCann-Erickson in New York. She moved back to Dublin as a founding Director of McCann-Erickson Dublin and subsequently moved to the Javelin Group where she was a Board Director. Lynne is a past President of IAPI and has served on the Board of the ASAI and CCCI. Lynne currently lectures on the DIT MSc in Advertising and has been a Clearance Manager with CCCI for five years.



**PAMELA SELBY**

Pamela Selby has over 15 years’ international marketing experience gained from a variety of strategic and operational brand marketing roles within both Diageo and Unilever Europe. Having led a number of award-winning, fully-integrated brand campaigns, she is known for her strong track record in leading both local and global brands to deliver business results. Her experience spans global icons such as Guinness, Lipton and Knorr, as well as more local household names like Lyons Tea, Ambrosia and Batchelors. Pamela currently works as an independent marketing consultant across a variety of projects, ranging from FMCG to the non-profit sector, and has been with CCCI since January 2013.



**JOE CLANCY**

Joe spent 10 years in London following QPR and worked in advertising with Brunnings and the Young & Rubicam Group to support this addiction. He returned to Ireland to rediscover his Munster Rugby roots and joined Hunter (Saatchi & Saatchi), later becoming MD at Bates and Red Cell, and then CEO of Young & Rubicam Dublin. He has managed campaigns for iconic brands such as Land Rover, Smirnoff, Baileys, Club Orange, Johnson & Johnson, Pfizer, Bayer and Zanussi, that have won awards at CLIO, NNI, ICAD, PAA and IAPI ADFX. His involvement in Munster’s two Heineken Cup Final victories however was in a purely supportive role. He served on the Council of The Marketing Institute and is a former Board Member of Central Copy Clearance Ireland.



**EOGHAN NOLAN**

Award-winning copywriter Eoghan Nolan brings a wealth of experience to the role, having been Creative Director and Board Director of McCann, Irish International BBDO and Leo Burnett. A former lecturer in Copywriting, Eoghan served on the boards of IAPI and of ICAD and currently runs his own creative consultancy, Brand Artillery.

Among his accolades are Ireland’s first D&AD, Radio Ad of the Millennium from the Kinsale Sharks and Best Copywriting 2012 from the National Newspapers of Ireland.



# OPERATIONAL OVERVIEW

**Central Copy Clearance Ireland, now trading as CopyClear, has been in operation since 2003. During that time it has played an important role in ensuring that alcohol marketing communications have been generally compliant with approved Codes of Practice.**

CopyClear deals with one part of the promotion of alcohol and operates on the basis that alcohol companies submit details of their planned campaigns in advance so that they can be vetted to ensure that they are compliant. This has resulted in very few complaints about alcohol ads to the Advertising Standards Authority for Ireland since CCCI/ CopyClear was established.

CopyClear clearance managers and general management met regularly during 2013 with both brand owners and their agencies to ensure understanding of the codes. CopyClear continues to promote an open door policy to discuss campaign ideas before they are submission ready – this helps ensure compliance in the work finally submitted and can help the creative and production process along the way.

In 2013, CopyClear considered a total of 4,124 submissions (which represented an increase of 594 from the 2012 figure of 3,530). This total number includes all versions of a proposed campaign, both preliminary ideas and finished



work. Consequently, the number of advertisements that eventually appear in print or broadcast is significantly lower than the number of submissions considered and is in the order of being equal to approximately 56% of all submissions.

Of the 4,124 submissions considered and assessed, 3,786 of them were approved, an approval rate of 91.8%; with 338 (8.2%) not approved and therefore not published or broadcast. These figures compare with a 91.2% approval and 8.8% non-approval rate in 2012. CopyClear considers submissions in a range of different

product categories – Beer and Cider, Spirits, Wine, Liqueurs and Ready to Drink (RTDs), and it considers ads originating both from overseas sources and from Irish sources. In the Beer and Cider category, the non-approval rate for overseas-originating advertising for delivery on the Irish market was 15.9% compared to an Irish-originating non-approval rate of 5.8%. This reflects the greater understanding of the Codes of Practice by Irish-based companies. Interestingly, in Spirits advertising, where overseas-originating ads had a non-approval rate of 4.9%, Irish-originating Wine ads had a non-approval rate of 7.7%. However, it needs to be noted that the number of overseas-originating Wine ads was only 307, a low number and therefore one that could show dramatic percentage changes. >>

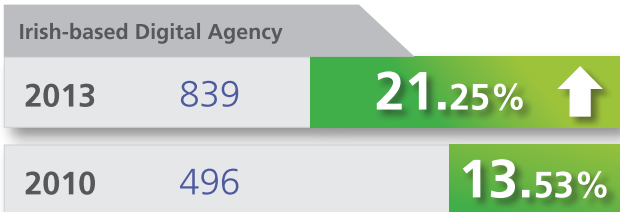
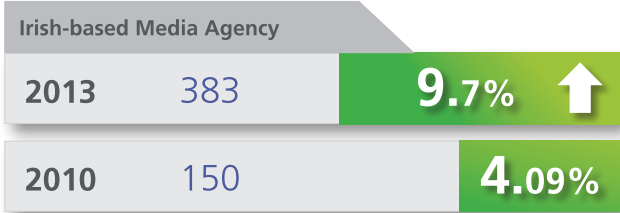


## Irish-based Advertising Agency

2013	1,375	34.83% ↓
2010	1,825	49.8%



# OPERATIONAL OVERVIEW



## PRODUCT CATEGORIES

CopyClear divides its analysis of alcohol submissions into different product categories, and this approach helps to more precisely identify patterns and trends.

Beer and Cider accounted for 2,670, 65% of the 4,124 total submissions.

This was up slightly from the 2012 figure when Beer and Cider accounted for 2,551 ads or 66%

of the total submissions. The 2013 non-approval rate for Beer and Cider submissions was 8.7% compared to 8.2% in 2012.

Spirit ads accounted for 893 submissions (21.7%) of the total – this is consistent with previous years where the managers viewed 790 (20.5%) and 889 (21.6%) submissions respectively in 2012 and in 2011.

The overall approval rate for Spirit ads in 2013 was 93.2% and 6.8% non-approval, and this compared with 91.8% and 8.2% respectively for 2012.

The total number of Wine ad submissions in 2013 was 265 compared to 192 in 2012 – the overall approval rate for Wine ads in 2013 was 92.8% compared to 87% in 2012.

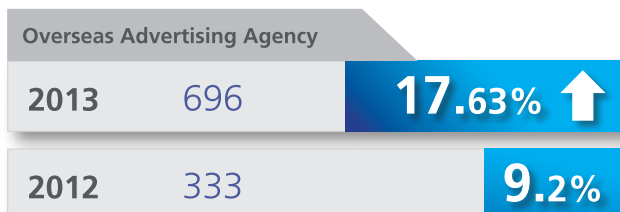
Liqueurs only accounted for a total of 16 submissions in 2013 as compared to 20 in 2012, while there had been 45 liqueur ad submissions in 2011. RTDs (Ready to Drink) showed a total of 172 submissions in 2013 with 89.5% of them being approved – 69% of these ads originated in Ireland whereas in 2012 six out of 94 RTD ad submissions had originated from overseas.

## SOURCE-ORIGINATION AND MEDIA CHANNELS

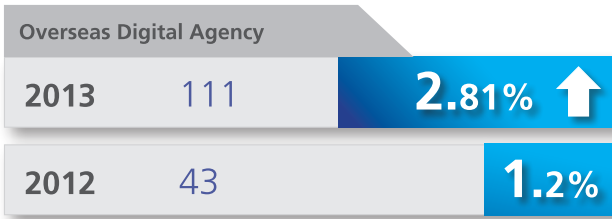
Almost 70% of the 4,124 ad submissions originated in Ireland, amounting to 2,855 submissions. The comparable figure for 2012 was 3,005 -78% of the total number of submissions. The ads originating from overseas-based companies and agencies tend to be part of wider global advertising campaigns for their brands. Overseas submissions amounted to 1,269 which compared to 795 in 2012, an increase of 63%.



In 2013, Irish originated material accounted for 69.2% of all submissions and had an approval rate of 93.6% compared to 2012, when Irish originated material comprised 78.7% of all submissions with an approval rate of 91.9%. Overseas







material accounted for 30.8% of submissions and had an approval rate of 87.8%.

Internet-based ads have become the number one media channel, a pattern that emerged in 2011. In 2013 accounted for 39.7% of all Irish-produced ads though it only accounted for 28.4% of the ads from overseas sources. Press and magazine advertising accounted for 12.4% of Irish-produced ads and for 12% of overseas-produced ads. TV accounted for 6.4% of Irish-produced ad submissions while overseas-originating ad submissions accounted for significantly more at 21.6%. Irish-originating ad submissions for Outdoor (93.4% approved and 6.6% not approved)

media amounted to 26.3% of the total and for 31.5% of the total of overseas-originating ads. Cinema as a channel for both Irish and overseas originating alcohol ads is minimal and 0.5% of the combined total.

**SUMMARY**

CopyClear’s remit covers marketing communications for alcohol brand advertising broadcast or published in Ireland. CopyClear assesses submissions in accordance with the Codes of Practice of the Advertising Standards Authority for Ireland (ASAI) though companies and advertisers are also required to comply with other codes such as those of the Broadcasting Authority of Ireland and in the context of placement codes which are overseen by the Dept. of

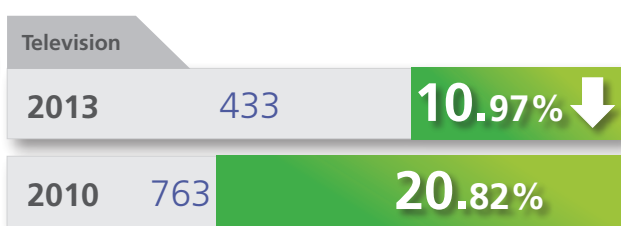
Health appointed Alcohol Marketing Communications Monitoring Body (AMCMB). This latter Code, which was agreed between the Dept. of Health and the alcohol and advertising industries, covers marketing and sponsorship and relates to a wide variety of locations in which alcohol marketing or promotion appears.

In addition, advertisers are also required to comply with industry codes such as those managed by the RRAI (Responsible Retailing of Alcohol in Ireland) which operates under the approval of the Dept. of Justice and MEAS. These various codes cover retail outlets, off-licences, licensed premises and mixed retail outlets.

**THE DEVELOPMENT OF COPYCLEAR**

Central Copy Clearance Ireland Ltd (CCCI) trading as CopyClear, 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 >>



## OPERATIONAL OVERVIEW



### Radio

2013	146	3.7% ↓
2010	220	6%



### Out-of-Home

2013	1,101	27.89% ↓
2010	1,071	29.22%



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 relevant Codes of Practice and that they would accept the adjudications of CopyClear in the matter.

This arrangement was further strengthened by the involvement of the major media as delivery partners. As advertising would appear in press, outdoor or broadcast media, it was important to engage the support of these channels in effectively implementing the CopyClear process. The result of this multi-party arrangement is that all advertisements must carry CopyClear approval and have a CopyClear certification number which has to

be quoted and presented when the advertiser is seeking to have an advertisement placed— otherwise it is not accepted by the media for publishing.

Each individual piece of advertising is 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 experienced in the industry and trained in the Codes of Practice. Vetting applies to all ads intended to be run in the Irish media, whether made in Ireland or developed internationally.

The CopyClear board is made up of nine members, four each of whom are nominated by the Association of Advertisers in Ireland (AAI) and the Institute of Advertising Practitioners in Ireland (IAPI) respectively, plus an independent Chairperson. None of the nominees come from the alcohol industry.

Administration of CopyClear is jointly provided by 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 CopyClear managers can appeal for a review by the Appeals Committee. This Committee comprises the Chairperson and two other members of the board.

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

Because advertising would appear in press, outdoor or broadcast media, it was vital to engage the support of these channels in implementing the CopyClear process. ●



### Paid-for Online Activations

2013	1,562	39.56% ↑
2010	822	22.43%





CopyClear is the trading name for Central Copy Clearance Ireland (CCCI).

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