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Non-advertising alcohol promotions in licensed premises: does the Code of Practice ensure responsible promotion of alcohol?

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Abstract

Introduction and Aims. *Binge drinking is a major public health issue in Australia, particularly among young people. There has been a considerable focus on alcohol advertising, among both researchers and policy makers, resulting in efforts to bring about some level of regulation of unacceptable advertising practices. However—despite the existence of a Code of Practice for Responsible Promotion of Liquor Products which provides 'a framework of practices which are considered acceptable and reasonable' for licensed premises—there are few, if any, data on the nature and extent of promotions which could arguably fall under either 'acceptable' or 'unacceptable' practices.* ***Design and Methods.*** *Over an 8-week period we monitored promotions offered by licensed venues (pubs, bars and clubs) in the Wollongong central area. Seventeen venues were identified, and each venue was visited daily for 1 week. Trained research assistants took notes on all promotions/events in visited venues, including both manufacturer- and management-initiated.* ***Results.*** *We identified a range of different types of promotions, including low cost and free drinks. Some of the promotions identified could be seen to have a positive public health impact, such as free food and free transport. However, the majority of promotions were of a nature likely to increase the likelihood of excessive drinking.* ***Discussion and Conclusions.*** *It is evident from this review that there are numerous examples of promotions which breach both the spirit and the letter of the Code. It is equally evident that the system for monitoring compliance with the Code is fundamentally inadequate.* [Jones SC, Lynch M. Non-advertising alcohol promotions in licensed premises: does the Code of Practice ensure responsible promotion of alcohol? *Drug Alcohol Rev* 2007;26:477–485]

Key words: alcohol, excessive drinking, licensed premises, responsible promotion.

Introduction

Alcohol and young people

Binge drinking is a major public health issue for Australia, the United States, the United Kingdom and most other industrialised countries. Binge drinking has been identified as particularly prevalent, and problematic, among university students [1–4]. In the United States, for example, national studies have reported that approximately two out of five college students are binge drinkers [5,6], and it has been estimated that 1400 college students die each year from alcohol-related injuries [7]. As well as the obvious long-term risks associated with excessive alcohol consumption, binge drinking is associated with a range of short-term risks including alcohol poisoning, unsafe sex, sexual assault, physical violence, motor vehicle accidents, property damage and other criminal activities [6–10].

Excessive alcohol consumption, and particularly 'binge drinking', among young Australians is an area of increasing concern. The 2004 National Drug Strategy Household Survey found that approximately 64.8% of males aged between 20 and 29 years consumed seven or more alcoholic beverages on at least one occasion in the 12 months prior to the survey, and 17.4% (compared to 14.6% in 2001) consumed this amount at least weekly during the same 12-month period [11]. Recent national [12] and state-based [13] surveys of university students find consistently that approximately half the respondents report binge drinking in the 2 weeks prior to being surveyed. Alcohol is also used widely by secondary students in Australia, with a significant proportion of the high school student population drinking at dangerous levels [14].

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Alcohol promotions

Over the last decade, there has been considerable focus on alcohol advertising as the potential influence of mass media—and particularly advertising—on the alcohol-related attitudes and behaviours of young people has been widely recognised [15]. The promotion of alcohol by retailers and media promotes a culture in which excessive alcohol consumption is seen as the norm, and the key challenge for public health is to move the culture to a position where moderation, rather than drunkenness, is accepted (and portrayed) as the norm [16]. While there is a need for continued research in the area of advertising, what has generally been neglected is the effect of non-advertising alcohol promotions on people's (and particularly young people's) alcohol-related attitudes and behaviours.

It is estimated that expenditure on alcohol advertising in mainstream media exceeds $100 million per annum [17]. However, rising costs of traditional media combined with increasing competition for consumer attention in a cluttered media environment have shifted the focus beyond above-the-line advertising and promotion to (unmeasured) alternatives such as sponsorship of sporting and entertainment events, product placements, new and interactive media (e.g. digital television, world wide web, SMS and e-mail, viral marketing) and in-store promotions/cross-promotions (for example, a recent promotion from a national music retailer which offered a voucher for a free pre-mixed branded vodka with music purchases over $20). This study focuses on point-of-sale promotions in licensed venues, which fall into this category of non-advertising promotions.

Non-advertising promotions

There is considerable evidence that increased availability of alcohol is associated with increased alcohol consumption. Further, it has been demonstrated repeatedly that there is an inverse relationship between the price of alcohol and the level of consumption [18–21], and that this effect is even more pronounced among young people [22–24]. For example, an experimental study in the United States found that alcohol consumption was more than doubled during simulated 'happy hours' among both heavy and light drinkers [25]. In a study of the effect of promotions on university students, US researchers found that for off-premises outlets (e.g. bottle shops) higher binge-drinking rates were correlated with: the availability of large volumes of beer; lower average price of a carton of beer; interior and exterior advertising; and promotions such as volume discounts, advertised price specials or coupons. For on-premises establishments (e.g. pubs) higher binge-drinking rates were correlated with: lower prices (particularly for larger servings); weekend beer specials; and the availability of promotions in the next 30 days [4]. It is also reported that advertised bar-sponsored alcohol promotions have a positive effect on both attitudes and intentions of young people when patronising a bar, and that they can also influence the expectations of amounts consumed for both oneself and others [26].

The background to the voluntary code

Alcohol advertising, and advertising in general, in Australia is subject to industry self-regulation and an associated series of voluntary codes. Self-regulation of advertising is the favored option of industry groups in most countries.

Since 1992, the Australian alcohol industry has run a pre-launch 'vetting' system for alcohol advertisements, and proclaims proudly that this has resulted in a dramatic reduction in complaints, at least between 1990 and 1993 [27]. However, in recent years the effectiveness of the voluntary code has been questioned, with researchers identifying numerous apparent breaches of the codes (e.g. [28–30]) and increasing public calls for an overhaul of the system [31,32]. The industry, in an effort to stem the debate and avoid external regulation, proposed a revised national Alcoholic Beverages Advertising Code. The revised code is now expanded to include a protocol regarding promotion of alcohol at events (alongside other minor changes such as some additional clauses and extended terms of reference) and requires that staff and patrons must be of legal drinking age, promotional staff must not misstate the nature or alcohol content of a product, promotional materials given away at events must not target underage audiences and (consistent with the voluntary code on advertising) promotional materials must not link the consumption of alcohol with sexual, sporting, financial, professional or personal success, or encourage consumption patterns that are inconsistent with responsible consumption.

At the state level there is also voluntary self-regulation. The New South Wales Liquor Industry Code of Practice for Responsible Promotion of Liquor Products, a voluntary code of practice developed by the industry, provides 'a framework of practices which are considered acceptable and reasonable' [33] which applies to licensed and registered premises. The Licensing Court of NSW 'imposes the Code of Practice as a standard liquor harm minimisation condition on liquor licences and certificates of registration', and the Department of Gaming and Racing 'monitors advertised promotions and will forward letters of caution if the promotion may be in contravention of the Code'. However, it is important to note that this is a voluntary code of practice which 'provides a framework of

practices which are considered acceptable and reasonable, subject to controls being in place, to prevent the intoxication of patrons and, in all other respects, the premises being properly conducted. The Code highlights those practices which *are discouraged* [our emphasis] as not being in the public interest'. Further, the Department of Gaming and Racing, as stated above, only monitors *advertised* promotions; and the Department issues only letters of caution.

These 'unacceptable practices' and 'acceptable practices' are listed in Table 1. Three important issues arise as a result of the wording, and implementation, of this Code of Practice which warrant further investigation. First, as shown, there are a number of exceptions to the rules (labelled as 'acceptable practices') such as the advertising of a low price for a particular brand of alcohol for the whole night, and incentives to purchase (such as prizes) that do not 'provide any particular incentive to consume that product more rapidly than a patron's normal drinking habit'. Secondly, there is little—if any—monitoring of the types of promotions offered by venues, largely because of the sheer number and dispersion of such venues. Thirdly, there are few—if any—data on the effect of promotions which could arguably fall under either 'acceptable' or 'unacceptable' practices. For example, it is common practice to offer 'drink cards' which offer a free drink or a prize (such as a cap or a t-shirt); a practice which is currently allowed, but would be 'unacceptable' if it encouraged patrons to consume larger quantities of alcohol in a shorter period of time than they otherwise would.

However, the industry's stated position—supported by the spirit of the Code of Practice—is consistent with that of public health advocates; that is, that excessive and/or rapid alcohol consumption is harmful and should not be encouraged.

Method

There have been no Australian studies which have attempted to investigate the nature of (non-advertising) promotions on licensed premises, whether such promotions appear to be designed to encourage patrons to attend the venue or to consume greater amounts of alcohol and, importantly, whether such promotions appear to comply with the relevant sections of the voluntary code on alcohol promotions (such as not encouraging excessive drinking).

This study sought to gather some initial data on this important area in order to provide pilot data and demonstrate the efficiency of the proposed methodology. Study data were collected on the extent and nature of such promotions in the central business district (CBD) of Wollongong, Australia. Wollongong is situated on the South Coast of New South Wales, approximately 80 km south of Sydney, and is the eighth

Table 1. *New South Wales liquor industry's Code of Practice: responsible promotion of liquor products*

Unacceptable practices	Acceptable practices
1. Drinks that offer alcohol in non-standard measures and/or by virtue of their emotive titles, such as 'laybacks', 'shooters', 'slammers', 'test tubes', 'blasters', and their method of consumption encourages irresponsible drinking habits and are likely to result in rapid intoxication	1. The traditional 'happy hour' during or immediately following normal daytime working hours
2. Drink cards that provide a multiple of free drinks, extreme discounts or discounts of limited duration on a given day or night and/or have the capacity to be readily stockpiled by patrons or transferred to other patrons. In other words, the drink card must not, by design or potential misuse, create an incentive for patrons to consume liquor more rapidly than they otherwise might	2. A complimentary standard drink upon arrival
3. Any labelling or titling of promotions that may encourage patrons to consume liquor irresponsibly and excessively to an intoxicated state	3. Promotions involving low-alcohol beer where it is clear from the advertising and promotional material that it is a low-alcohol beer promotion
4. The refusal to serve half-measures of spirits on request or provide reasonably priced non-alcoholic drinks	4. The advertising of a consistent price of a particular type or brand of liquor across the entire trading hours of a premises on a given day or night, providing the price is not so low that it will, in itself, encourage the excessive consumption of alcohol and intoxication
5. Any promotion that encourages a patron to consume liquor excessively: 'all you can drink offers', 'free drinks for women', 'free drinks for women all night, 'two for one' and to consume it in an unreasonable time period	5. Promotion of particular brands of liquor that provide incentives to purchase that brand by virtue of a consistent discounted price, offer of a prize, etc. but does not provide any particular incentive to consume that product more rapidly than a patron's normal drinking habit

largest city in Australia. It has an estimated resident population of 192 402 as of June 2005 with a median age of 37.2 years [34], but also houses a university with a total of 21 148 enrolled students, over 1000 of whom live on one of the seven university accommodation campuses [35].

An overall total of 25 licensed venues (pubs and clubs) were identified within the defined boundaries of the CBD area. Two research assistants were recruited to collect the data for the study; both these research assistants were over the age of 18 years. The research assistants initially attended a training session and were provided with a notebook and a digital camera. They were given a roster of dates and times to visit each premise, with dates allocated systematically to ensure that each on-premise establishment was visited on seven occasions (once on each day of the week), with all visits occurring between 8.00 p.m. and 11.00 p.m. The research assistants were instructed to visit each establishment on the specified date and time and take notes on any alcohol promotions evident during their visit and (when possible) to take photographs of these promotions. This included any free offerings, any happy hours, games, events, activities or promotions. They were also instructed to pay attention to all posters or flyers that may be on the walls/doors, and when possible to take photos of these using the digital camera. An essential element of the training was to instruct the research assistants that they were not to consume alcohol during the data collection.

For the first 2 weeks of the data collection, the research assistants attended all venues together and took notes and photographs independently; they then met with the authors the following morning to review the notes and photographs to ensure consistency between the two individuals in terms of the identification and description of promotions. Due to the simple nature of the information being collected (date, venue, promotion type, promotion value/price and product/brand) there were minimal differences between the two coders and these were resolved by discussion. After the first 2 weeks, when it was clear that the research assistants were coding consistently, the photographs and descriptions were collected on a weekly basis, which allowed for weekly briefing sessions to ensure that the data collection was undertaken as planned and to address any further questions or concerns from the research assistants.

Limitations

As each of the venues was visited only seven times across the 8-week study period, these results cannot be said to provide a comprehensive overview of all of the promotions offered; however, this means that our results are likely to underestimate the nature, range and extent of these promotions. Our case study focused on one defined geographic area, and thus the findings may not be generalisable to other cities, towns or regions. While anecdotal evidence suggests clearly that these types of promotions—as well as many others not identified in our study—are prevalent in all parts of the country, there is a need for further research to investigate the nature and range of these promotions across a wider geographic area.

Results

Overall, 14 of 25 venues were found to offer some form of promotion. Those venues not offering any promotional activities were, in large part, sporting and recreation clubs with an older clientele (e.g. returned servicemens' leagues clubs, workers' clubs and bowling clubs). Table 2 describes each of the 14 included venues that offered promotions.

The data collected were categorised into five specific groups: 'happy hour' activities (cheap drinks); 'special events' (including sporting events); 'manufacturer-initiated promotions and competitions'; 'venue-initiated competitions and activities'; and 'free stuff' (products and activities that the venue itself is providing for no charge). The following section provides details on observed promotions in each of these categories.

Happy hour (cheap drinks)

We recorded a total of 11 'happy hour' promotions; many of which appeared to be in contravention of the Code. Only five of the venues ran their happy hours at the end of the working day, as per the Code of Practice. These happy hours generally ran for a 2-hour period from 5 p.m. to 7 p.m. (venues A and F) or 4.30 p.m. to 6.30 p.m. (venue G), on 2–5 nights per week. Venue J ran its 'foreplay' promotion on Wednesdays, with reduced-price beer from 5 p.m. to 6 p.m. and reduced-price spirits and cocktails from 6 p.m. to 8 p.m., and on Fridays its 'slide' promotion, with reduced-price beer, wine and spirits from 5 p.m. to 6 p.m. Venue H offered a range of happy hour promotions, including a student happy hour on Tuesdays between 7.30 p.m and 8.30 p.m. and Thursdays between 6.30 p.m. and 7.30 p.m.; a Sunday happy hour from 4.30 p.m. to 5.30 p.m.; and a Wednesday happy hour from 6 p.m. to 7 p.m. (note that this was the only venue offering a happy hour promotion which lasted for 1 hour). One of the more unusual promotions offered by this venue is 'toss the boss', a promotion run on Tuesdays and Thursdays from 5 p.m. to 6 p.m.; when a patron orders a drink, two dice are rolled and—depending on the numbers rolled—the patron receives the beverage free, for half price or full price.

Table 2. *Description of venues*

Venue	Description
A	Operates from Wednesday to Sunday as part of a large hotel chain. Located across the road from a popular Wollongong beach, this venue caters to a mixed crowd of both hotel guests and Wollongong locals. Generally attracts a younger (under 30 years) crowd
B	Operates 7 days a week with a pub-style bar area, outdoor beer garden, as well as a separate night club area that is home to live bands and disc jockeys throughout the year. During the week the clientele at this venue are generally aged 40+; however; at weekends the crowd is generally 30 years and under
C	This venue is considered to be an up-market establishment that caters mainly to young patrons (under 30 years); however, the age range is extremely varied. It operates as part of a large entertainment and sporting venue located near a popular Wollongong beach
D	This venue is located on one of Wollongong's main roads and offers three levels and two bars. Designed mainly to cater to a young crowd (25 years and under), university students are a large portion of their patronage, especially on weekdays. At weekends, this venue is the only venue open past 3a.m.
E	During the week and on Saturdays this venue attracts a mid-age-range clientele (30–50 years); on Sundays, however, its clientele is predominantly young people and university students. This venue consists of two levels and three bars (a lounge bar, a casual pub-style bar and a more up-market bar), and is well known in Wollongong for its Karaoke nights
F	Located in central Wollongong, this venue attracts a range of different demographics depending on night of the week. Thursday night is popular with young people and university students
G	This venue has a large number of poker machines and gambling facilities and caters mainly to an older crowd (40+). It has two separate bar areas over two levels
H	This venue has three separate bars, the main pub bar, the upstairs cocktail lounge and the completely separated third bar area. Arguably one of the most popular venues in the Wollongong area, this pub caters to a variety of different demographics, including a large number of university students, young people (18–30) and those 30–50 years, both local and from outside the Wollongong area
I	This venue is located next to a major sporting ground and caters mainly to an older crowd (40+), with a large number of poker machines and gambling facilities
J	Located on a university campus, this venue obviously relies on the patronage of university students. They provide entertainment throughout the university session such as local and international bands and disc jockeys, as well as theme nights. While the majority of their patrons are university students, they are not exclusive to this demographic and do attract a general 18–30 year crowd
K	Only open on Saturday nights and Sunday long weekends, this night club has three bars on three levels, along with music provided by in-house and guest disc jockeys. This venue caters predominantly to the younger demographic (18–25 years)
L	Located in the western area of Wollongong, this pub caters mainly to those 40 years and over and generally those who are local to the Wollongong area
M	This nightclub has three bars over two levels and relies on the music of in-house disc jockeys. Designed to cater to the university crowd, this venue is open only on Wednesday and Thursday nights
N	Located on one of Wollongong's main roads, this pub is one of the only alternative live band venues in the Wollongong area. The age range of patrons at this venue is fairly varied

Three of the venues ran their 'happy hour' promotions later in the evening. In two cases this was 8.00 p.m. to 11.00 p.m. (venues K and M); and in the third (venue B) Wednesdays from 9.00 p.m. to 11.00 p.m. and on Saturdays from 9.00 p.m. to midnight.

However, three of the venues offered far more extensive happy hours. Venue D had reduced-price beer and standard spirits on Wednesdays from opening at 10 a.m. until 10 p.m.; reduced-price standard drinks ('standard drinks' refers to beer, wine and standard spirits) and a brand-name ready-to-drink (RTD) beverage on Fridays from opening until 10 p.m.; and the same reduced-price brand-name RTD on Saturdays from opening until 11 p.m. Venue E offered an extensive happy hour—with reduced-price beer from Monday to Friday from 10 a.m. to 6 p.m. However, on Fridays, once happy hour finished at 6.00 p.m., beer was sold at a slightly higher (but still reduced) price from 6 p.m. to 8 p.m., and then slightly higher (but again still reduced) from 8 p.m. to close. On Sundays, the happy hour ran from 6 p.m. to 9 p.m. and included reduced-price standard drinks. Venue I candidly called its Monday to Friday offering a 'happy days' promotion, with reduced-price beer from 9 a.m. until 6 p.m. Additionally, on the Sunday of visitation, they offered selected sprits and liqueurs for less than one-third of the usual price until they ran out.

Special events

The State of Origin (this is an annual sporting event that has the Queensland rugby league team playing 'best of three' games spread over several weeks against the NSW rugby League team) was played on Wednesday 6 July 2006. While the design of the study did not permit us to visit all the venues on that night, the three that were visited showed a consistent pattern of reduced, and even free, drinks associated with the progress of the game. Venue G offered reduced-price schooners of beers from 7.30 p.m. until the end of the game; venue I offered reduced-price schooners from the start of the game until the first point was scored, as well as a promotion in which every $5.00 spent over the bar provided an entry into a competition to win a NSW Blues (the home state team) fridge; and venue H offered patrons *free* beer from the start of the game until the first point was scored.

One venue (venue I) ran drink promotions associated with televised boxing matches—promoted as 'fight nights'—on two of the occasions it was visited by the research assistants. On both occasions, patrons were offered reduced-price beer from the start of the matches until the last fight; for example, on the Sunday there were seven fights, commencing at 1.00 p.m.

Other venues offered a range of entertainment—such as live bands, disc jockeys and other entertainment—but these are not reviewed here as they were not associated with reduced-price drinks, but appeared to be designed to attract patrons to attend the venues rather than to consume additional alcohol.

Manufacturer-initiated promotions and competitions

We identified 10 manufacturer-initiated promotions during the study period. The most common form of promotion was entry into a competition with purchase of a specific brand of alcohol (five promotions), followed by scratch-and-win tickets (three promotions) and then free merchandise (two promotions). These promotions complied with the letter of the Code in that they utilised drink cards (or similar promotions) that were not time-limited, although whether offering a reward for consuming four or more drinks encourages people to drink more than they normally would is a contentious issue.

The competitions involved purchasing any two UDL products (RTD) to receive an entry card for a competition to win a trip to New Zealand (venue D); a schooner of Tooheys beer for entry into a competition to win a large Tooheys Esky (venue L); four Carlton beers to receive an entry form into a competition to win a 4WD safari to Cape York (venue F); four VBs for entry to win football headgear (venue F); and four Tooheys new beers for an entry form to win a trip to New Zealand (venue H). The scratch-and-win promotions were a vodka Cruiser 'wish upon a star' promotion (venue H); a Canadian Club promotion, with a game card with every bottle purchased (venue H); and a Carlton draught beer scratch-and-win ticket for product merchandise (venue F), aptly named 'blatant marketing ploy #5.' The free merchandise promotions were a free beanie (hat) with every four VB beers purchased (venue F); and a Cougar bourbon promotion with a range of free merchandise offered for purchasing pre-mixed Cougar and Cola (5% alcohol)—including purchase of four cans to receive a free keyring, purchase six to receive a free cap and purchase 10 to receive a free t-shirt (venue N).

Venue-initiated competitions and activities

We identified nine venue-initiated competitions and activities; in general, these appeared to be designed to promote (attendance at) the venue, rather than to encourage excessive drinking. The most commonly observed competitions were pool (billiard) competitions offered by four venues: venue L on Wednesdays; venue D on Wednesdays, including a free pint upon entry and offering $50 and $25 prizes; venue F on Tuesdays, with a $100 first prize; and venue H on Mondays, with a $50 first prize and half a case of beer as second prize. Other competitions included trivia competitions at two venues—venue L on Wednesdays and venue H on Sundays; and a darts competition on Sundays and poker and meat raffles on Fridays at venue L. Additionally, one venue (venue D) offered the chance to win $200 if patrons were in the venue before 11 p.m. and another (venue J) offered entry to win prize packs (which included tickets to the event and CDs) for the university's annual garden party (an annual event held at the university which showcases numerous bands, disc jockeys and sideshow entertainment).

Giveaways and free offers

Free entry to some venues was offered, either for specific groups of people or at specific times. For example, venue M offered free entry to all university students on Wednesdays and Thursdays, and venue D offered free entry on Wednesdays and until 11.00 p.m. on Fridays. A number of the venues offered free food, which can be seen as a harm-reduction strategy and is generally encouraged. For example, venue B offered free pizza on Wednesdays and venue E provided a free barbecue on Sundays. Two of the venues offered free transport, which could have been a harm-reduction strategy or harm-increasing strategy (further research would be needed to determine this); for example, venue J offered a free bus into the city centre on Wednesdays (but it is unknown whether this was more a method for

patrons to get home or to get to one of the drinking venues which offered free entry on Wednesdays), and venue D offered free transport on Wednesdays. However, this transport was between the Wollongong University accommodation campuses and the venue, and then later from this venue to venue M.

Discussion

It was concerning to note that only one of the 12 venues had a happy hour that ran for 60 minutes, with the remaining 11 running for a minimum of 2 hours. Four of the 11 venues that offered a happy hour 'after usual working hours' commenced their promotion at 8.00 p.m. or later, which appears to be stretching the definition somewhat. Further, two of the venues offered a happy hour that ran most of the day, with one actually being so forthright as to call it a 'happy day'.

The Code of Practice also states that venues can 'promote a consistent price of a particular type or brand of liquor across the entire trading hours of a premises on a given day or night, providing the price is not so low that it will, in itself, encourage the excessive consumption of alcohol and intoxication'. This appears to be a loophole in the Code of Practice; for example, one venue that offered cheap drinks 'on a given day' (from 10.00 a.m. to 6.00 p.m.) stopped at the time that would technically be deemed 'happy hour' time and then offered a reduced (but slightly higher) priced promotion from 6.00 p.m. to 8.00 p.m., and then another slightly higher from 8.00 p.m. to closing. Similarly, venue H's 'toss the boss' promotion is followed immediately by its student happy hour.

Furthermore, the Code of Practice is silent as to who and what deems when a price is low enough 'to encourage excessive consumption'. Many of the prices we observed in this study resulted in a cost for alcohol considerably lower that the cost of soft drinks (for example, one could expect to pay $2.50 for a 375-ml bottle of Coca Cola at many delicatessens and more at most pubs). A promotion such as the 'toss the boss' offered by venue H appears to have the potential to encourage rapid and excessive consumption—as this is offered on a per order basis rather than a per drink basis there is certainly a temptation for some drinkers to purchase multiple drinks when they have a better than even chance of obtaining them free or for half price. This also appears inconsistent with clauses of the Code of Practice which state that it is acceptable to offer one free drink on entry, and it is unacceptable to offer 'Any promotion that encourages a patron to consume liquor excessively (e.g., 'all you can drink offers' or 'two for one', 'free drinks for women'—'free drinks for women all night') and to consume it in an unreasonable period.'

One of the most commonly raised concerns among those addressing alcohol consumption and young people is the close association between alcohol and sport [36,37]. This was evident in several of the promotions we observed during this study. Note that several of these promotions appeared to be inconsistent with the Code in offering free, or reduced-price, drinks for short periods and were thus likely to result in rapid and excessive consumption.

The promotions associated with sporting events provide further support for the concerns that have been raised by public health researchers regarding the association between watching sports and excessive alcohol consumption. Some venues offered reduced-price drinks for the duration of the game, designed to encourage patrons to remain at the venue for the duration, which raises the previously mentioned concerns about the well-recognised association between alcohol promotion (and consumption) and sports. More importantly, some of the venues offered promotions with very low-priced or free drinks from the beginning of the game until the time the first point was scored; we posit that it is simple to argue that such a promotion 'encourages a patron to consume liquor excessively... and to consume it in an unreasonable period'.

As well as the general issues discussed above, a specific area of concern is the apparent targeting of university students in a number of venues and promotions. For example, we identified promotions including free entry for students, 'student happy hours' and free transport from university campuses to venues and between venues. Given that university students are already a high-risk group for excessive alcohol consumption, promotions which target this group specifically are an important area for examination and intervention.

This study sought only to examine the nature of the promotions offered by these venues, not to investigate the effects of these promotions on drinking behaviours. There is an urgent need for research to examine the effects of these promotions on the drinking behaviour of young people, as this will be a key step in determining what does, in fact, constitute responsible promotion of alcohol. Even more urgent is the need to engage the industry, and the government, in taking steps to eliminate promotions such as those described which clearly have the potential to encourage young people to drink at risky levels.

It is evident from this review that there are numerous examples of promotions which breach both the spirit and the letter of the Code. It is equally evident that the system for monitoring compliance with the Code is fundamentally inadequate. First, the Department of Gaming and Racing, as stated above, only monitors *advertised* promotions—which means that most, if not

all, the promotions identified in this study would have gone unnoticed and unchallenged. Secondly, members of the public can lodge a complaint about a promotion if they know how to do so and, given that details of how to complain are not provided with copies of the code, it is unlikely that many members of the public would feel able to make a complaint. Finally, in the event that a complaint is made, and action taken, the venue may be able to make minor changes and continue with what appears to the layperson to be an unacceptable practice.

The findings from this pilot study of the effectiveness of the voluntary code for in-venue promotions for alcohol are consistent with the findings of previous research into the effectiveness of the voluntary code for alcohol advertising in Australia [30]. That is, while the industry claims to be committed to reducing alcohol-related harm and thus proactive in developing self-regulatory codes, these codes appear to be largely ineffective in promoting a culture of responsible promotion and consumption of alcohol. Rather, their primary outcome appears to be to forestall the introduction of an effective regulatory system.

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