

Alcohol Promotion on Facebook

Sarah Mart, Jacob Mergendoller, Michele Simon

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Abstract

Since its debut five years ago, Facebook has grown exponentially to include colleges and universities, high school and business networks, along with the general public around the globe. In that same time, Facebook also changed its advertising policies and regulations from not offering online advertising to soliciting paid advertisements for products and services including alcohol products. Although the company's policy requires paid advertisements for alcohol to include age restrictions, the policy is not enforced by Facebook, nor does the restriction requirement apply to other sources of alcohol content throughout Facebook. For this article, we explored the prevalence of alcohol-related content found in popular aspects of Facebook profiles. We also identified aspects of Facebook that contain a great deal of alcohol content and are accessible by anyone, regardless of age. We offer recommendations for both Facebook and the alcohol industry to remove paid ads and other types of content promoting alcohol products and dangerous drinking behaviors in order to protect youth and young adults from the harmful effects of alcohol advertising.

Keywords

Facebook, alcohol advertising, social networks

Facebook was launched from a Harvard dorm room in 2004 by its creators, Mark Zuckerberg and his three roommates (1). Since its debut just five years ago, Facebook has expanded to include other colleges and universities, high school networks, and anyone in the world with an email address. Over the years Facebook has changed its advertising policies and practices from not offering online advertising to soliciting paid advertisements for products and services including alcohol. We could find no articles about Facebook and alcohol advertising in the peer-reviewed literature and little documentation of the types or amount of content promoting alcohol and drinking behaviors present on Facebook. This article is an attempt to account for the presence of alcohol in its most popular forms found on Facebook.

Alcohol, Youth, and Advertising

Alcohol is the most widely used drug among youth in the United States (2) and the third leading cause of preventable death (3). In 2001, underage youth consumed at least 16% of all alcohol sold in the United States, accounting for \$18 billion in sales (4). Economic costs of alcohol are estimated to have been \$220 billion in the U.S. in 2005 (5). In 2007, 26% of American youth reported having five or more drinks in a row in the past 30 days (6). In addition to contributing to poor mental health (7), poor education (8), and increased risk of crime (9), alcohol interferes with the structure of a youth's biological learning process and can permanently impair brain development (10). Numerous types of harm such as motor vehicle accidents, suicide, depression, fighting, property damage, sexual violence, and unprotected sex which can lead to pregnancy and sexually transmitted diseases (11) are related to underage drinking.

The alcohol industry aims to normalize and encourage the consumption of alcohol by portraying products and people drinking them in a fun, cool, exciting manner. The alcohol industry exploits youth and young adults through its niche marketing using a variety of methods such as billboards, posters, newspapers, television, and the Internet to make their brands particularly attractive to the underage audience and ultimately create brand loyalty (12). Alcohol advertisements are effective in capturing the attention of youth and usually do not mention any of the risks involved. Greater exposure to alcohol advertising contributes to earlier initiation of drinking for youth who have not started yet, higher drinking levels among underage youth who drink, and positive expectations and attitudes about alcohol that help create an environment promoting underage drinking (13).

Alcohol Advertising on the Internet

Fifty-five alcohol websites had close to 700,000 in-depth visits from underage youth during six months in 2003, which accounted for 13.1% of all in-depth visits to those sites during the measurement period (14). The interactive nature of the Internet has made it possible for alcohol advertising and marketing to seamlessly weave editorial content and advertising messages for alcohol products and blur any supposed boundaries between the two. Despite portals requiring a birthdate showing legal drinking age in order to gain access to beer and spirits websites, a multitude of sports and gambling games, brand-related quizzes, screensavers, and wallpapers are easily available to underage youth via such sites (15).

Recently, alcohol companies have begun to promote their products on social networking sites that are immensely popular among youth. California's Murphy-Goode Winery created a new staff position that will use Twitter and similar social networking websites to advertise the winery's products (16). This summer, Southern Comfort whiskey became the first known company in the alcohol industry to dedicate its entire advertising budget to digital online properties: In addition to websites such as Hulu, Facebook is Southern Comfort's main advertising medium (17).

Alcohol and Facebook

Facebook is the largest social networking site on the Internet (surpassing both MySpace and Twitter), with more than 250 million active users worldwide (18). A third of Facebook users (84 million) are twenty years old or younger (19). Facebook uses its own terminology specific to its social networking platform to describe features that it makes available to individual users, as well as to companies using Facebook as a marketing and advertising medium. We offer brief descriptions of relevant Facebook terminology here.

Facebook Ads: When a company buys ad space on Facebook, it can access information users list in their profiles including their interests, activities, and photos and present users with promotional content that is personally tailored to them. Facebook Ads consist of up to three banner ads that appear on the right-hand side of each page once a user logs into Facebook. Facebook Ads are promoted to companies to "reach your exact audience and connect real customers to your business...[and] create demand for your product with relevant ads" (20).

Companies are invited to advertise both their products as well as other Facebook features related to their product with Ads. Facebook Ads are the only feature that companies pay to use. Companies are also encouraged to use free Facebook features to promote their products.

Facebook Pages: Pages are "a customizable presence for an organization, product, or public personality to join the conversation with Facebook users... By leveraging the real connections between friends on Facebook, a Page lets Fans become brand advocates" (21). Facebook users can become fans of Pages, and Pages can have an unlimited number of fans. Facebook asks creators of new Pages to "certify that you are an official representative of this brand, organization, or person and that you are permitted to create a Facebook Page for that subject," and notes that "Fake Pages and unofficial 'fan pages' are a violation of our Pages Guidelines. If you create an unauthorized Page or violate our Pages Guidelines in any way, your Facebook account may be disabled" (22). Pages may include links to the brand's official website, photos of the products, and a wall where fans can post comments regarding the brand and the company can post messages, video, and Facebook Applications for fans to use.

Facebook Applications: Applications are designed for users to engage in more interactive behavior on Facebook such as taking quizzes, rating movies, and playing games. These applications are usually developed by third-party social media developers or by individual users.

Facebook Events: Events allow individual users and companies to advertise the date, time, location, sponsor(s), purpose, and description of an occasion and invite other Facebook users to attend (and indicate their intent to do so). Many events are advertisements for entertainment functions such as nightclubs, dance parties, concerts, or sporting events sponsored by an alcohol brand or company. Events may be advertised in Ads, Pages, or Groups.

Facebook Groups: Groups can be created by any individual user about almost any topic and are displayed on individual users' profiles once they become a member. Group pages feature a discussion board, a list of all the members, a wall for members to post comments, photos, videos, web links to other related content or Groups, and the opportunity to create, post, and promote events to the Group members. Group size is limited to 5,000 members. Alcohol-related Groups on Facebook are created by individual Facebook users who show a strong affection for a certain alcohol brand, type of drink, or type of drinking activity.

Facebook Policy Regarding Alcohol Content

Facebook's *Advertising Guidelines* require that companies use demographic restrictions (viewer restrictions based on age) for all advertisements for alcoholic beverages (23). These restrictions include targeting alcohol ads to users whose birthdates, contained in their Facebook profile information, indicate that they are of legal drinking age in the U.S., Canada, or the United Kingdom, and twenty-one years or older in other countries where the users are located (24). When a user's age cannot be determined (usually because the user has not entered their birthdate in their profile), the ad cannot be displayed.

The *Advertising Guidelines* also contain restrictions for Pages. All viewer restrictions for alcohol-related Facebook Pages must be set at twenty-one years or older, regardless of the country the user is in or the country the Pages target (25).

Provisions in Facebook's *Alcohol Advertising Guidelines* are similar to the voluntary, self-regulatory codes the alcohol industry trade groups maintain for advertising and marketing alcohol (26, 27). According to Facebook's guidelines:

Ads must be targeted to people 21 years old or older in the US, 19 years old or older in Canada, 18 years old or older in the UK, and 21 years old or older everywhere else. All Facebook Pages viewer restrictions must be set at 21+ regardless of the country they are in or targeted to. In the case where a user's age cannot be determined, the ad cannot be displayed to the user in question (does not apply to applications on Facebook Platform).

Ads cannot include content that might appeal to (or mislead) minors by implying that the consumption of alcoholic beverages is fashionable or the accepted course of behavior for those who are underage.

Ads cannot include or target any person under the legal drinking age in the region the ad appears or be suggestive of the presence of those who are underage. Additionally, ads appearing in applications on Facebook Platform must adhere to the Platform Guidelines Alcohol Content Policy.

Ads cannot portray or promote intoxication.

Ads cannot induce people to consume alcohol in excess, make references to the intoxicating effects of alcohol, depict activities that encourage excessive consumption or that encourage drinking at a rapid rate, or suggest the strength of the alcoholic beverage being advertised.

Ads cannot promote any giveaways as a reward for purchasing the alcoholic product (28).

The *Platform Guidelines Alcohol Content Policy* advises developers who create third-party Facebook Applications that they are "required to use Demographic Restrictions so that Facebook users can view, be presented with, or have access to alcohol-related content only to the extent permitted by local laws in the country from which the Facebook user is accessing the application" (29).

The *Facebook Statement of Rights and Responsibilities* for users and others who interact with Facebook includes a section on safety, with the directive that those who use Facebook will not develop or operate a third party application containing, or advertise or otherwise market, alcohol-related or mature content without appropriate age-based restrictions. In this statement, the "Special Provisions Applicable to Advertisers" also says that Facebook may reject or remove any ad for any reason (30).

What We Did

To examine the various ways that alcohol is promoted on Facebook, we conducted searches and set up two different user profiles. We did not conduct an exhaustive systematic review; rather, we conducted a limited, qualitative examination of the most prevalent alcohol messaging on the Facebook platform. Toward that end, we searched for five Facebook features associated with the ten top-selling beer brands (Bud Light, Budweiser, Coors Light, Miller Lite, Natural Light, Busch Light, Busch, Miller High Life, Keystone Light, and Michelob Ultra) and the ten top-selling spirits brands (Smirnoff, Bacardi, Captain Morgan, Absolut, Jack Daniels, Crown Royal, Jose Cuervo, Grey Goose, Jim Beam, and Jagermeister) (31), as well as alcohol brands popular with youth and young adults, such as Mike's Hard Lemonade and Malibu. We also searched for unbranded terms such as alcohol, binge, and shots. We created two user profiles using fictitious names, birthdates, and personal information. One user profile was over age 21, and the other was under age 21. In order to become a target for alcohol companies utilizing Facebook's Ads, we listed a number of alcohol-related terms such as drinking, partying, nightlife, bars, and shots under "Interests" and "Activities" on both profiles.

What We Found

A great deal of alcohol-related content is contained in the five Facebook features described earlier: Ads, Pages, Applications, Events, and Groups. We examine each of these features below.

Ads

After "alcohol" and "bars" were listed in the users' interests and the users became fans of several alcohol-related Pages, one alcohol-related Ad appeared out of every eight Ads. Alcohol-related Ads promoted both general nightlife activities such as: 1) an ad for Thrillist with the tagline "Let us help you find free booze;" 2) an ad for MexBaltimore which asked the user, "Want to drink FREE? Click here for your chance at winning an open bar party for you and 100 of your closest friends!;" 3) the bar Petaluma Nightlife which listed a number of its "killer drinks;" and 4) specific brand marketing, such as hyperlinks to the Belvedere Vodka Page and the Beck's Beer Page. These ads could be accessed by the under-21 user. Coors Light and Heineken banners were seen in the "News Feed" (a list of recent actions taken by friends highlighted on individual users' home pages), and Ads for Johnnie Walker whisky were displayed on the side of the page for the over-21 user.

Several non-alcohol product Ads made strong references to nightlife, partying, and extreme intoxication. For example, an Ad for the "University of Andy," a fictional university, displayed an image of an attractive, seductively-dressed young woman with the caption, "Love to Party? If so, you'll want to get party tips from UNIVERSITY OF ANDY..." Another banner for a non-alcohol product had the title "Wow, that was some party! But now that term paper's due. Don't sweat plagiarism. Check your paper now before the prof does. Click here." A third banner promoted Rohto Eye Drops, which displayed an eye drop container with the caption, "When the party's over, get the red out and wake up tired eyes with a 'kick'. Do you ROHTO?" These Ads for non-alcohol products using messages about drinking and partying were accessible to all users.

Pages

We found ninety-three Pages with a total of more than 1.1 million fans listed for the top-selling beer brands. The number of Pages per brand ranged from zero (Busch Light and Natural Light) to thirty-one (Budweiser), and the number of fans per brand ranged from 284 (Keystone Light) to 451,675 (Coors Light). A total of 334 Pages and more than 3.2 million fans were listed for the ten top-selling spirits brands. The number of spirits Pages ranged per brand from four (Crown Royal and Grey Goose) to eighty-five (Smirnoff). The total number of fans ranged per brand from 15,659 (Crown Royal) to a very popular 1,076,690 (Jack Daniels).

Fans posted their praise for the respective alcohol products on the wall of the Page. Comments posted on the Captain Morgan Page included: "all i no is the day i turn 21...im so buying a huge bottle of this great liquor..." "It's not a party unless you invite the Captain. Drink or jump ship," and "captain and me are best friends!" (32). On a Page simply titled "Alcohol!," members posted comments such as "Oh Alcohol, I am your Biggest Fan !!!!!" and "ALCOHOL....it's what's for breakfast, lunch, and dinner!!! LOVE THIS STUFF!" (33).

From Pages for twelve popular brands (Smirnoff, Smirnoff Ice, Captain Morgan, Jack Daniels, Bacardi, Bacardi Breezer, Budweiser, Heineken, Coors Light, Absolut, Malibu, and Mike's Hard Lemonade), six Pages were accessed by the under-21 user. The six Pages that did not use demographic restrictions were Captain Morgan, Jack Daniels, Bacardi, Bacardi Breezer, Heineken and Mike's Hard Lemonade. Facebook users of all ages are easily allowed to become fans of these pages and receive marketing messages directly from the companies such as the "Heineken Hawaii Summer Sweepstakes," (34) "Bacardi Breezer Desktop Downloads" (35), and photos of Captain Morgan's upcoming products (36). The other six Pages did not appear in the search results when we attempted to access them as the under-21 user.

Applications

An abundance of Facebook Applications involve alcohol. More than 500 separate applications are currently associated with 8 general alcohol terms: alcohol, tequila, whisky, vodka, rum, beer, wine, and shots. We reviewed six Facebook Applications: "Bacardi Mojito Party," "Send Your Friends a Shot of Jose Cuervo," "Shots!," "Collect Shots!," "Beer Mail," and "Alcohol!!!."

"Bacardi Mojito Party" asked the user to virtually mix the perfect mojito with the right ingredients and in the correct sequence in order to satisfy a number of virtual patrons, along with several types of interactive games and activities (37). When attempting to access it directly from the under-21 profile, the user saw the following message: "Use of application 'Bacardi Mojito Party' has been restricted. We're sorry, but this application is not available to you. Please visit the Application Directory to find other applications." The under-21 user was not able to access "Bacardi Mojito Party."

The Application, "Send Your Friends a Shot of Jose Cuervo," contained the tequila's brand name in its title and allowed the under-21 user to access the Application's related Page. On this Page, the "About" section told users to "send shots of tequila to your friends" (38). The under-21 user was not able to access the Application itself.

The "Shots!" information page painted a particularly crude picture of the Application: "Give the gift of Shots! Absolutely no chase. Are you the life of a party? or the messy drunk passed out in the bathroom? FEED your friends SHOT after SHOT and get them absolutely F***ED UP!" (39). This Application was accessible to the under-21 user.

"Collect Shots!" was created for users to send virtual shots to their Facebook friends. The stated goal of the Application was to "Take a shot, then collect them and showcase them on your profile. See how many shots you can collect from your friends" (40). The Application listed more than 10,500 monthly active users and was accessible to the under-21 user.

The "Beer Mail" Application encouraged users to send their Facebook friends virtual beer gifts and advertised that the more beer users sent to their friends, the more beer gifts would be unlocked. The Application told users: "Love BEER? Share some BEER with your friends and get them drunk" (41). This Application listed more than 63,200 monthly active users. It was accessible to the under-21 user.

"Alcohol!!!" was another Application that allowed the user to virtually send their friends alcoholic drinks. The identifying photo displayed with the application was a Jose Cuervo tequila bottle. This application was also accessible to the under-21 user (42).

Four of the six alcohol Applications we found were accessible to the under-21 user. This user was able to send shots to Facebook friends, collect different types of alcohol, and display actions taken and related drinks on the user profile for others to view.

Events

Alcohol-related Facebook Events were commonplace, with a total of more than 2,200 Events associated with the five best-selling beer brands (Bud Light, Budweiser, Coors Light, Miller Lite, and Natural Light) and an additional total of more than 2,200 events associated with the five best-selling spirits brands (Smirnoff, Bacardi, Captain Morgan, Absolut, and Jack Daniels) (43).

"Smirnoff Saturdays" was a Facebook Event that took place in North Carolina in July 2009. The description of the event advertised a ten dollar entry fee for an open bar and free drinks from 9pm to 4am. The free drinks advertised in this Event included "dark and coke...cranberry and Smirnoff vodka...Hennessey and coke...beer of your choice." The Event also listed "open bar 9pm-11pm with college ID," "drink specials all nite," and "18 & over" in the description (44). This Event was accessed by the under-21 user.

Other recent alcohol-related events on Facebook included: a "Captain Morgan Welcome Back Tour of Gainesville," with the tagline of "Kick off the new semester w/ a little CAPTAIN in ya!" advertising to students at the University of Florida that they should not "miss the opportunity to party with the legend" (Captain Morgan himself) (45); an event entitled "Heineken Keg Party 2 at the Coast Nightclub" advertising a discounted price for Heineken beer with no mention of attendees needing to be 21 years of age or older (46), and "Lollapalooza '09," with a tagline reading "Come hang out with 93XRT and Budweiser!" This event advertised the rock concert Lollapalooza sponsored by Budweiser and featuring a number of popular artists such as The Killers, Kings of Leon and Snoop Dogg (47). All of these events were accessed by the under-21 user.

Groups

When we entered the term "alcohol" into the Facebook search engine, more than 58,000 Groups were displayed. More than 5,000 total Groups were associated with the top-selling beer brands, with more than 5,000 total Groups associated with the top-selling spirits brands (48). Many other Groups were associated with more general alcohol activities, such as the 342 Groups listed with the name "Binge Drinkers" (49).

Even when Groups had general alcohol-related names, specific alcohol brands were still listed throughout the Group. One of the "Binge Drinkers" Groups included comments on its wall answering the post "favorite beverage to binge on" such as: "Bud Diesel," "I am more of a Natural Light or Busch Light hugger," "...the only way to go is the silver bullet!," "JACK D!," and "...captain and monster" (50).

Some Groups displayed graphics of babies or guns with bottles of alcohol and used photos of specific brands of alcohol such as Bud Light, Smirnoff, Stella Artois, Mike's Hard Lemonade, or Joose as their identifying Group photo. Many alcohol-related Groups listed hyperlinks to alcohol-related Applications as well. Most of the alcohol-related Groups we reviewed were accessible to the under-21 user.

One Group we found promoted Joose, a caffeinated, high-octane alcohol product under recent scrutiny by members of the National Association of Attorneys General Youth Access to Alcohol Committee (51). The Joose Group included a photo of four Joose cans on ice, stating "JoosellUp!" Under the description the Group listed: "If you have yet to partake in the glory that is JOOSE... then you must change that, immediately! For those of you that know its glory, join and drink on. JOOSE lovers, drink on!" The Group also listed the brand's official website as its contact information. Under "Recent News," the Group posted: "Check out the new flavor of JOOSE now available at a store near you JUNGLE JOOSE!! ...packs 9.9% alc/vol in a big 23.5oz can that will ROCK YOU!" (52). The Joose Group and its related Page were accessible to the under-21 user.

Discussion

Although Facebook states publicly that it is "committed to protecting our user experience by keeping the site clean, consistent, and free from intrusive advertising" (53), the Facebook Ads, Pages, Applications, Events, and Groups promoting alcohol products and alcohol-related drinking behaviors tell a different story.

According to our limited review, it appears that paid alcohol Ads (that are subject to at least some guidelines) are relatively few compared to the tens of thousands of alcohol-related Pages, Applications, Events, and Groups (that are hardly subject to any guidelines). Such Facebook features with alcohol-related content are de-facto free advertising for the respective brands. As key parts of a comprehensive viral marketing plan, these other promotional Facebook features are just as important as traditional ads, if not more so. Viral marketing content must be interesting, useful, or entertaining enough to invite the consumer to pay attention, as opposed to content that intrudes or disrupts the user's online experience (54). The alcohol-related content on Facebook overwhelmingly fits the description of viral marketing.

Despite Facebook's *Alcohol Advertising Guidelines* requiring age restrictions on alcohol Ads, Pages, and Applications, much content promoting alcohol and dangerous drinking on Facebook is accessible to users of every age:

Only fifty percent of the Pages we reviewed restricted access based on age. Facebook users of all ages could become fans, view photos of individuals consuming alcohol, post and read comments, and receive updates from the Pages.

Applications advertised alcohol with specific brand names, photos, graphics, descriptive content including excessive drinking behaviors, and links to brand websites—none of which were restricted based on age.

Events advertised alcohol not only by advertising their sponsors (alcohol brands or bars), but also by displaying event information and attendee comments describing excessive and dangerous drinking behaviors and specific alcohol brands. No age restrictions on Events were indicated in our review, and the Facebook *Advertising Guidelines* do not include Events.

The Groups we reviewed advertised alcohol with specific product photos, hyperlinks to brand web sites, events sponsored by alcohol companies, and applications using product information, with no age restrictions.

Facebook's policies regarding alcohol Ads and alcohol-related content in Pages, Applications, Events, and Groups do not effectively protect its users from exposure. Facebook does not appear to monitor or ensure compliance with its own alcohol advertising rules, despite Facebook's claim that it reserves the right to reject or remove advertising that it deems contrary to its advertising philosophy (55). Despite policy requiring age restrictions on alcohol-related Pages and Applications, under-21 users are able to access many of them. Because no official policy requires age restrictions on alcohol-related Events or Groups, under-21 users are able to access many of these Facebook features as well.

Requiring age restrictions on Facebook features does not fix the entire problem with alcohol-related content on Facebook, however, unless the company extends its restrictions to Events and Groups and is more diligent in monitoring and enforcing the restrictions overall. Alcohol corporations enjoy viral marketing through Facebook because it allows them to promote their products through multiple features: an alcohol company (or third-party marketing firm) can create a Page with information about its brand where users post Events, Applications, and Groups; users create Groups with brand-related content and messages where they post Pages, Applications, and Events; the brand and users create brand-sponsored or related Events where brand websites, Pages, Applications, and Groups are posted; third-party developers and users create Applications using the brand name and embed the Applications in the Pages, Groups, and Events; and Ads promoting any of these features as well as specific products can be purchased by both corporate and individual users. In other words, it's the wild west of the internet, which Facebook's current policies cannot possibly effectively control.

Those policies, with their associated lack of monitoring and compliance, are also problematic because they do not ensure that the parties Facebook intends to maintain certain features (e.g., brand owners) are the ones actually doing so. It appears unlikely that alcohol companies are responsible for every single one of the hundreds of alcohol brand-related Pages on Facebook. Indeed, many Pages for specific brands displayed typos, bad grammar, curse words, and fuzzy graphics, not quite the usual slick promotion we see from alcohol producers. Alcohol-related Pages for general alcohol terms such as vodka are prevalent, yet they do not meet Facebook's definition of or purpose for Pages and were likely created by individual users. Alcohol-related Events and Groups, while seemingly generated by individual users, often contain brand web addresses, slogans, photos, and promotional messages. In true viral marketing fashion, the line between corporate advertising and user-generated content is almost completely blurred. This lack of clarity regarding who's doing what creates monumental challenges in regulating content.

At the same time that Facebook must address the inadequacies of its policies, the alcohol industry must also question its affiliation with Facebook as a marketing tool when content so blatantly violates many of the industry's own advertising guidelines. Pages, Applications, Events, and Groups all contained numerous posts about harmful behaviors associated with specific brand names of a variety of beer and spirits, many accessible to users of all ages. These Facebook formats also displayed content containing alcohol products that is prohibited by *Facebook Advertising Guidelines*, such as photos of guns alongside bottles of alcohol. As the alcohol industry continually states that it is capable of regulating its own advertising, it should carefully examine the ways its products are promoted on Facebook in violation of its own codes.

Recommendations

Changes clearly need to be made to the Facebook policies regulating advertising and demographics restrictions for alcohol-related content. As we have seen with the alcohol industry's ineffective birthdate website portals, it is easy to lie about one's age in order to view an alcohol brand's website. The only way to protect youth and young adults from the incessant promotion of alcohol on Facebook is to remove all content about alcohol. In light of the disturbing pervasiveness of alcohol-related advertising and messages found on Facebook, we recommend that Facebook should:

- Stop accepting paid advertisements for alcohol products;
- Stop allowing alcohol-related Pages, Applications, Events, and Groups;
- Hire external monitors to enforce these new regulations.

While considering the complete removal of Ads, Pages, Applications, Events, and Groups promoting alcohol products and alcohol-related messages, Facebook should at minimum immediately:

- Extend the restrictions currently placed on paid alcohol Ads to include messaging about dangerous drinking behaviors (not just specific alcohol products);
- Establish the same demographic restrictions currently placed on paid alcohol Ads to all Pages, Applications, Events, and Groups pertaining to alcohol;
- Hire external monitors to enforce these new regulations.

In addition to Facebook improving its guidelines and restrictions for alcohol advertising and related content, alcohol corporations also have responsibility and should:

- Require that Facebook remove all content about their products until it revises its advertising policy and instates monitoring and compliance practices;
- Require demographic restrictions in all Facebook features used to promote their products, including Ads, Pages, Applications, Events, and Groups.

Although Facebook hosts users of every age, it was originally created and designed by college students and has always been formatted to appeal to young people. Facebook started as a fun tool for college students to interact and connect online, yet it has morphed into another means for corporations and developers to exploit its users, particularly youth. Because Facebook continues to grow as the youth market's social networking tool of choice, the alcohol industry's influence on Facebook must not be underestimated. Given Facebook's current failure to protect youth from accessing pervasive content promoting alcohol products and harmful drinking behaviors, new policies regarding alcohol advertising are needed.

Author Information

Sarah M. Mart, MS, MPH
Research & Policy Manager, Marin Institute

Ms. Mart is a public health researcher and advocate with over ten years of experience directing health promotion and prevention departments at institutions of higher education. Prior to joining Marin Institute in early 2009, she directed health promotion and prevention departments at Syracuse University, the University of San Francisco, and The University of Montana-Missoula. Ms. Mart has provided technical assistance and trainings to campuses and regional and statewide coalitions across the nation as a Center Associate with the U.S. Department of Education's Higher Education Center for Alcohol, Other Drug and Violence Prevention. Ms. Mart holds a master of public health from the University of Northern Colorado and a master of science in Women's Studies from Minnesota State University-Mankato.

Jacob Mergendoller
Research & Policy Intern, Marin Institute

Mr. Mergendoller is a second-year undergraduate student at Wesleyan University where he is majoring in Psychology.

Michele Simon, JD, MPH
Research and Policy Director, Marin Institute

Michele Simon is a public health lawyer specializing in policy analysis, legal strategies, and countering corporate tactics. With 10 years of experience researching and writing about the food industry, Ms. Simon is the author of *Appetite for Profit: How the Food Industry Undermines*

Our Health and How to Fight Back. She is currently watchdogging the alcohol industry as Marin Institute's research and policy director. Ms. Simon is a regular speaker on both food and alcohol policy at various national and international conferences. Ms. Simon has taught Alcohol Policy at the University of California, Berkeley, and Health Policy at the University of California, Hastings College of the Law, where she also received her law degree. She obtained her master's degree in public health from Yale University.

Conflict of Interest Statements

I declare that I have no proprietary, financial, professional or other personal interest of any nature or kind in any product, service and/or company that could be construed as influencing the position presented in, or the review of, the manuscript entitled Alcohol Promotion on Facebook.

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References

1. Facebook.com [Internet]. Palo Alto: Company Timeline. [updated 2009 Aug; cited 2009 Aug 24]. Available from: <http://www.facebook.com/press.php#/press/info.php?timeline>
2. The Surgeon General's call to action to prevent and reduce underage drinking. Final report. U.S. Department of Health and Human Services, Office of the Surgeon General, 2007. [cited 2009 Aug 24]. Available from: <http://www.surgeongeneral.gov/topics/underagedrinking/calltoaction.pdf>
3. Mokdad AH, Marks JS, Stroup DF, Gerberding JL. Actual causes of death in the United States, 2000. *JAMA*. 2004;291:1238-1245.
4. Miller TR, Levy DT, Spicer, RS, Taylor, DM. Societal costs of underage drinking. *J Stud Alcohol*. 2006;67:519-528.
5. Harwood, H. (2000). Updating estimates of the economic costs of alcohol abuse in the United States: Estimates, update methods, and data, 2000. Final report. Rockville (MD): National Institute on Drug Abuse and the National Institute on Alcohol Abuse and Alcoholism, National Institutes of Health, Department of Health and Human Services; 2002 Dec. NIH Publication No.: 98-4327. [cited 2009 Aug 24]. Available from: <http://pubs.niaaa.nih.gov/publications/economic-2000/alcoholcost.pdf>
6. Eaton DK, Kann L, Kinchen S, Shanklin S, Ross J, Hawkins J, Harris W. Youth risk behavior surveillance—United States, 2007. *MMWR* [Internet]. 2008 Jun 6 [cited 2009 Aug 4]; 57(SS-4): [about 1p.]. Available from: http://www.cdc.gov/HealthyYouth/yrbs/pdf/yrbss07_mmrw.pdf
7. Jefferis B, Powwer C, Manor O. Adolescent drinking level and adult binge drinking in a national birth cohort. *Addiction*. 2005;100:543–549.
8. Englund MM, Egeland B, Oliva EM, Collins, WA. Childhood and adolescent predictors of heavy drinking and alcohol use disorders in early adulthood: a longitudinal developmental analysis. *Addiction*. 2008;103:23–35.
9. Pitkänen T, Kokko K, Lyyra AL, Pulkkinen, L. A developmental approach to alcohol drinking behaviour in adulthood: a follow-up study from age 8 to age 42. *Addiction*. 2008;103:48–68.
10. Spear L. Adolescent brain and the college drinker: Biological basis of propensity to use and misuse alcohol. *J Stud Alcohol Suppl*. 2002;14:71–81.
11. Bonomo YA, Bowes G, Coffey C, Carlin, JB, Patton, GC. Teenage drinking and the onset of alcohol dependence: a cohort study over seven years. *Addiction*. 2004;99:1520–1528.
12. Aaker DA. *Managing Brand Equity*. New York: The Free Press 1991.
13. Anderson P, De Bruijn A, Angus K, Gordon, R, Hastings G. Impact of alcohol advertising and media exposure on adolescent alcohol use: A systematic review of longitudinal studies. Special issue: The message and the media. *Alcohol Alcohol*. 2009;44:229-243.
14. Clicking with kids: Alcohol marketing and youth on the internet. Washington, DC: The Center on Alcohol Marketing and Youth. 2004 Mar [cited 2009 Jul 23]. Available from: <http://www.camy.org/research/internet0304/report-high.pdf>.
15. Clicking with kids: Alcohol marketing and youth on the internet. Washington, DC: The Center on Alcohol Marketing and Youth. 2004 Mar [cited 2009 Jul 23]. Available from: <http://www.camy.org/research/internet0304/report-high.pdf>
16. Susman T. \$10,000 to Twitter about wine? It's a 'really Goode job.' *The Los Angeles Times*. 2009 Jun 9; [cited 2009 Aug 24]. Available from: <http://articles.latimes.com/2009/jun/05/nation/na-wine-twitter5>
17. Mullman J. Southern Comfort pours entire media budget into digital. *Ad Age* [Internet]. 2009 Jul 29 [cited 2009 Jul 30]. Available from: http://adage.com/article?article_id=138202
18. Facebook.com [Internet]. Palo Alto: Press Room Statistics [updated 2009 Aug; cited 2009 Jul 21]. Available from: <http://www.facebook.com/press/info.php?statistics#/press/info.php?statistics>
19. Corbett P. iStrategyLabs Blog [Internet]. 2009 Facebook Demographics and Statistics Report: 276% Growth in 35-54 Year Old Users [Internet]. Washington, DC: Peter Corbett. 2009 Jan 5 [cited 2009 Jul 21]. Available from: <http://www.istrategylabs.com/2009-facebook-demographics-and-statistics-report-276-growth-in-35-54-year-old-users>
20. Facebook.com [Internet]. Palo Alto: Facebook Advertising. [cited 2009 Aug 25]. Available from: <http://www.facebook.com/advertising/>
21. Facebook.com [Internet]. Palo Alto: Facebook Pages Product Guide. [cited 2009 Aug 25]. Available from: <http://www.facebook.com/advertising/FacebookPagesProductGuide.pdf>
22. Facebook.com [Internet]. Palo Alto: Create New Facebook Page. [cited 2009 Aug 25]. Available from: <http://www.facebook.com/pages/create.php>
23. Facebook.com [Internet]. Palo Alto: Facebook Advertising Guidelines. [updated 2009 Jul 29; cited 2009 Aug 24]. Available from: http://www.facebook.com/terms.php?ref=pf#ad_guidelines.php

24. Facebook.com [Internet]. Palo Alto: Facebook Advertising Guidelines. [updated 2009 Jul 29; cited 2009 Aug 24]. Available from: http://www.facebook.com/terms.php?ref=pf#/ad_guidelines.php
25. Facebook.com [Internet]. Palo Alto: Facebook Advertising Guidelines. [updated 2009 Jul 29; cited 2009 Aug 24]. Available from: http://www.facebook.com/terms.php?ref=pf#/ad_guidelines.php
26. Distilled Spirits Council of the United States, Inc. Code of responsible practices for beverage alcohol advertising and marketing. Washington, DC: The Council; 2009 Jan. Available from: http://www.discus.org/pdf/61332_DISCUS.pdf
27. Beer Institute. Advertising and Market Code. Washington, DC:2006 Jan. Available from: <http://www.beerinstitute.org/BeerInstitute/files/cclibraryFiles/Filename/000000000384/2006ADCODE.pdf>
28. Facebook.com [Internet]. Palo Alto: Facebook Advertising Guidelines. [updated 2009 Jul 29; cited 2009 Aug 24]. Available from: http://www.facebook.com/terms.php?ref=pf#/ad_guidelines.php
29. Facebook.com [Internet]. Palo Alto: Additional policies governing all applications and developers: Alcohol content policy. [cited 2009 Aug 24]. Available from: http://wiki.developers.facebook.com/index.php/Additional_Policies_Governing_All_Applications_and_Developers#11_Alcohol_Content_Policy
30. Facebook.com [Internet]. Palo Alto: Statement of rights and responsibilities: Special provisions applicable to advertisers. [cited 2009 Aug 24]. Available from: <http://www.facebook.com/terms.php>
31. The Beverage Information Group. Handbook advance 2009: A special report on spirits, wine and beer sales and consumption in 2008. Norwalk (CT): M2Media360; 2009. 162 p.
32. Facebook.com [Internet]. Palo Alto: Captain Morgan Spiced Rum Fan Page. [cited 2009 Jul 30]. Available from: <http://www.facebook.com/home.php?#/pages/Captain-Morgan-Spiced-Rum/12222684652?ref=search>
33. Facebook.com [Internet]. Palo Alto: Alcohol! Group. [cited 2009 Jul 30]. Available from: <http://www.facebook.com/home.php?#/pages/Alcohol/61126769687?ref=search>
34. Facebook.com [Internet]. Palo Alto: Heineken Facebook Fan Page. [cited 2009 Jul 21]. Available from: http://www.facebook.com/pages/Heineken/7174672354?_a=1#/pages/Heineken/7174672354
35. Facebook.com [Internet]. Palo Alto: Bacardi Breezer Facebook Fan Page. [cited 2009 Jul 21]. Available from: <http://www.facebook.com/s.php?init=q&q=bacardi&ref=ts#/bacardibreezer?ref=s>
36. Facebook.com [Internet]. Palo Alto: Captain Morgan Spiced Rum Facebook Fan Page. [cited 2009 Jul 21]. Available from: <http://www.facebook.com/album.php?aid=25465&id=12222684652>
37. Facebook.com [Internet]. Palo Alto: Buddy Media, Inc. Bacardi Mojito Party Application. [cited 2009 Jun 11]. Available from: <http://apps.facebook.com/bacardimojito>
38. Facebook.com [Internet]. Palo Alto: Send Your Friends a Shot of Jose Cuervo! Application. [cited 2009 Aug 25]. Available from: http://www.facebook.com/search/?q=Send+Your+Friends+a+Shot+of+Jose+Cuervo+&init=quick#/apps/application.php?id=128769787296&ref=search&sid=10000093643567_493115753_1
39. Facebook.com [Internet]. Palo Alto: Appsumption, Inc. Shots! Application. [cited 2009 Jun 23]. Available from: <http://www.facebook.com/apps/application.php?id=9922461478&ref=s>
40. Facebook.com [Internet]. Palo Alto: Drinking It Up, Inc. Collect Shots Application. [cited 2009 Jul 1]. Available from: <http://apps.facebook.com/shot-dxizko/>
41. Facebook.com [Internet]. Palo Alto: Beer Mail Application. [cited 2009 Jul 21]. Available from: <http://www.facebook.com/s.php?q=beer+mail&init=quick>
42. Facebook.com [Internet]. Palo Alto: Alcohol!!! Application. [cited 2009 Aug 25]. Available from: http://www.facebook.com/search/?q=Alcohol%21%21%21+&init=quick#/apps/application.php?id=58115755262&ref=search&sid=10000093643567_2087969142_1
43. The Beverage Information Group. Handbook advance 2009: A special report on spirits, wine and beer sales and consumption in 2008. Norwalk (CT): M2Media360; 2009. 162 p.
44. Facebook.com [Internet]. Palo Alto: Smirnoff Saturdays Event. [cited 2009 Jul 21]. Available from: http://www.facebook.com/search/?init=srp&sfxp=&o=&q=Smirnoff+Saturdays#/event.php?eid=106597613235&ref=search&sid=1824943240_830096551_1
45. Facebook.com [Internet]. Palo Alto: Captain Morgan Welcome Back Tour of Gainesville Event. [cited 2009 Jul 15]. Available from: <http://www.facebook.com/event.php?eid=35680177138&ref=search>
46. Facebook.com [Internet]. Palo Alto: Heineken Keg Party 2 at the Coast Nightclub Event. [cited 2009 Jul 15]. Available from: <http://www.facebook.com/event.php?eid=96080159756&ref=search>
47. Facebook.com [Internet]. Palo Alto: Lollapalooza '09 Event. [cited 2009 Jul 16]. Available from: <http://www.facebook.com/event.php?eid=97545690746&ref=search>
48. The Beverage Information Group. Handbook advance 2009: A special report on spirits, wine and beer sales and consumption in 2008. Norwalk (CT): M2Media360; 2009. 162 p.
49. Facebook.com [Internet]. Palo Alto: Binge Drinkers Group. [cited 2009 Aug 21]. Available from: <http://www.facebook.com/search/?q=Binge+Drinkers&init=quick#/topic.php?uid=17083118023&topic=5446>

50. Facebook.com [Internet]. Palo Alto: Binge Drinkers Group. [cited 2009 Aug 21]. Available from: <http://www.facebook.com/search/?q=Binge+Drinkers&init=quick#/topic.php?uid=17083118023&topic=5446>
51. Kesmodel D. Buzz Kill? Critics Target Alcohol-Caffeine Drinks. Wall Street Journal. 2009 AUG 3 [cited 2009 Aug 25]. Available from: <http://s.wsj.net/article/SB10001424052970203674704574328322293679870.html>
52. Facebook.com [Internet]. Palo Alto: JOOSE Group. [cited 2009 Aug 21]. Available from: <http://www.facebook.com/search/?q=joose&init=quick#/group.php?gid=2516791412&ref=search&sid=10000093643567.212094043..1>
53. Facebook.com [Internet]. Palo Alto: Facebook Advertising Guidelines. [updated 2009 Jul 29; cited 2009 Aug 24]. Available from: http://www.facebook.com/terms.php?ref=pf#/ad_guidelines.php
54. Howard T. Viral advertising spreads through marketing plans. USA Today. 2005 Jun 22 [updated 2005 Jun 23; cited 2009 Aug 21]. Available from: http://www.usatoday.com/money/advertising/2005-06-22-viral-usat_x.htm
55. Facebook.com [Internet]. Palo Alto: Facebook Advertising Guidelines. [updated 2009 Jul 29; cited 2009 Aug 24]. Available from: http://www.facebook.com/terms.php?ref=pf#/ad_guidelines.php
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