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Consumer protection messages in alcohol marketing on Twitter in Ireland: a content analysis

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ABSTRACT

Alcohol marketing provides a high-reach opportunity to communicate consumer protection messages (e.g. health warnings), but there are concerns about the efficacy of self-regulatory practice. Through the Public Health (Alcohol) Act, Ireland will mandate the presence of such information. To understand the potential impact of the Act, we examined: (1) the presence of self-regulated consumer protection messages in alcohol marketing on Twitter; and (2) the presence of warnings (about alcohol, drinking when pregnant, and cancers) and signposts to websites with information about alcohol, which will be required under the Act. Data come from a content analysis of Tweets ($n = 554$) from a purposive non-probabilistic sample of 13 alcohol companies either based in Ireland or, for multinational companies, where marketing was targeted at Ireland. A third of Tweets (36.3%) had a self-regulated message, with 'Get the facts. Be DRINKAWARE' featured most (20.0%). No Tweets signposted independent health websites, 20.6% signposted an industry-funded website (drinkaware.ie), and 6.7% signposted industry-controlled websites. No Tweets featured warnings about the dangers of alcohol or link to cancers. Only one brand (0.5% Tweets) referenced drinking during pregnancy, but only through incidental exposure to warnings on packaging. Ireland's legislation will fundamentally improve communication of warnings in alcohol marketing on Twitter.

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Alcohol marketing; Twitter; health warnings; health information; alcohol advertising; social media

Introduction

In the Republic of Ireland ('Ireland'), an estimated 14.8% of the general population have an alcohol use disorder (Mongan et al., 2021), with alcohol associated with many harms (O'Dwyer et al., 2021). To reduce consumption and harms, the Irish Parliament passed the Public Health (Alcohol) Act ('the Act') in October 2018 to control how alcohol can be marketed (Irish Statute Book, 2018). Alcohol advertising has been restricted on public transport, near youth-oriented environments (e.g. schools), at cinemas, and on children's clothing since November 2019 (Institute of Public Health, 2020). Off-trade retailers have been required to separate alcohol products and advertising from non-alcoholic products through a physical barrier since November 2020 (An Roinn Slàinte et al., 2019), and restrictions on some price promotions and offers were introduced in January 2021 (An Roinn Slàinte et al., 2021). Restrictions on sponsoring certain events, and some advertising during sporting events, became mandatory in November 2021 (Institute of Public Health, 2020) and a minimum price per gram of alcohol was introduced in January 2022 (Health Service Executive, 2021). Time restrictions on radio and television advertising, limits on print advertising, and plans to mandate health warnings on

alcohol packaging, do not yet have scheduled implementation dates.

Section 13 of the Act will also require most advertising to only contain factual information about the product and include, in a design and format specified by the Government: (1) a warning about the dangers of alcohol consumption; (2) a warning about the dangers of alcohol consumption when pregnant; (3) a warning about the direct link between alcohol and fatal cancers; and (4) details of an independent website containing public health information about alcohol (Irish Statute Book, 2018). Similar requirements for only factual information and health warnings already apply to alcohol advertising in France (Gallopel-Morvan et al., 2017). The Section 13 controls do not yet have an implementation date, but once commenced a one-year transition period is forecast (Drinks Ireland, n.d.[a]). The Section 13 controls will not apply to alcohol-related merchandise, fixtures or fittings attached to an on-licence or premises where alcohol products are manufactured or sold by wholesale, and vehicles owned by a company which manufacturers or sells alcohol by wholesale (Irish Statute Book, 2018).

Until Section 13 is commenced in Ireland, the presence and design of consumer protection messaging for alcohol marketing remains controlled through a non-statutory code of conduct administered by the Advertising Standards

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Authority for Ireland (ASAI), who are primarily funded through annual subscriptions paid by the advertising industry (ASAI, n.d.; ASAI, 2016), and self-regulation by the alcohol industry and other media bodies (Drinks Ireland, n.d.[b]). Item 9.4 of the ASAI code stipulates that '*marketing communications for alcohol* [defined as products exceeding 1.2% alcohol-by-volume] *should include a responsibility message to drink alcohol responsibly*' (ASAI, 2016; p. 71). Additional guidance from the alcohol industry suggests that this need for responsible messaging applies to both traditional advertising (e.g. outdoor, print, broadcast) and social media promotions (Drinks Ireland, n.d.[b]). CopyClear, an alcohol-industry-funded organisation responsible for pre-vetting brand advertising and overseeing regulatory compliance for non-paid-for online spaces controlled by alcohol brands (Copy Clear, n.d.), further advise that the responsibility messages should appear in both the text and images of social media posts (Copy Clear, 2019). The guidance also advises that companies who fund DrinkAware Ireland (drinkaware.ie) should include a message and link to that website, whereas other companies should include an equivalent statement encouraging responsible drinking (Copy Clear, 2019). The voluntary and self-regulatory codes contain no requirements for marketing to feature explicit health warnings.

Voluntary and self-regulated consumer protection messages in alcohol advertising have been criticised on the grounds that they often appear secondary to promotional content or contribute more to promotional goals than conveying effective health information (Smith et al., 2014). Similar concerns have been raised regarding the communication of health information on alcohol packaging (O'Brien et al., 2021; Petticrew et al., 2016) and how risks are presented more generally by the alcohol industry or industry-affiliated organisations (e.g. Lim et al., 2019; Maani Hessari et al., 2019; Mialon & McCambridge, 2018; Peake et al., 2021; Petticrew et al., 2016, 2018; Pettigrew et al., 2016). In particular, it is suggested that industry-favoured messages such as 'responsible drinking', as is currently recommended in Ireland's self-regulatory codes, are strategically ambiguous, do not communicate objective health information, are open to subjective interpretation, place the onus on individual decisions, and may not translate into lower-risk drinking behaviour (Barry & Goodson, 2011; DeJong et al., 1992; Jones et al., 2017; Maani Hessari & Petticrew, 2018; Roznowski & Eckert, 2006; Smith et al., 2006). Similar criticisms have also been raised about how consumer protection and health messages are communicated by the gambling (van Schalkwyk et al., 2021) and tobacco industries (Henriksen et al., 2006; Smith & Malone, 2008; Wakefield et al., 2006). Research also suggests that health messaging led by the alcohol industry is less effective among consumers than independent public health-led messaging (e.g. Blackwell et al., 2018; Brennan et al., 2020; Jones et al., 2017, 2021).

Examining consumer protection messages in alcohol marketing on social media, particularly in Ireland, is important for three reasons. First, digital media has become a key component of alcohol marketing strategy (Carah & Brodmerkel, 2021; World Health Organization Regional Office for Europe, 2021) and, correspondingly, promotional material appears in

various formats across social media platforms (Barry et al., 2016; Barry, Padon, et al., 2018; Barry, Valdez, et al., 2018; Nicholls, 2012; Winpenny et al., 2014). Second, alcohol marketing on social media is successful in reaching consumers in Ireland, including those under the minimum legal purchasing age (Fox et al., 2015). For example, around half of adults in Ireland recall seeing alcohol marketing on social media in the past-month, even during the COVID-19 pandemic when other marketing activities experienced decreases in awareness (Critchlow & Moodie, 2021). Finally, while engagement with digital alcohol marketing is positively associated with increased consumption and hazardous drinking (Noel et al., 2020), it is suggested that displaying clear warnings alongside alcohol marketing on social media may moderate this persuasive effect (Lou & Alhabash, 2020; Noel & Lakhan, 2021).

To our knowledge, no research has examined consumer protection messages in traditional or digital alcohol marketing in Ireland. Such research is needed to understand both adherence to existing self-regulatory codes and what impact, if any, Section 13 may have on the communication of warnings and public health information about alcohol. We therefore examine: (1) the presence of voluntary and self-regulated consumer protection messages in alcohol marketing on Twitter in Ireland; and (2) the current presence of warnings (about consuming alcohol, drinking when pregnant, and cancer) and signposts to public health information about alcohol, which will soon be mandated under Section 13 of the Act.

Materials and methods

Design and website context

A content analysis was conducted on Twitter posts from a purposive non-probability sample of 13 alcohol companies either based in Ireland or, for multinational companies, where the marketing was targeted at consumers in Ireland. Twitter is a free online platform for microblogging and social networking where users can post Tweets and interact with Tweets posted by others (Twitter, n.d.[a]). Twitter was chosen for investigation as the open-source nature of the platform was practical for accessing and capturing content from out-with Ireland. It is estimated that approximately a third of adults in Ireland have a Twitter account and, of this, two-fifths use the platform daily (Ipsos MRBI, 2019).

Alcohol companies sampled

A recent and publicly accessible list of the best-selling or most popular alcohol products in Ireland could not be found, for example as ranked in an industry publication. Instead, a purposive non-probability sample of relevant accounts was identified by searching Twitter for alcohol brands listed for sale on the websites of a leading supermarket (www.tesco.ie) and specialist drinks retailer (www.obrienswine.ie) in Ireland and by examining other accounts recommended by Twitter's 'who to follow' and 'you might like' algorithm when viewing appropriate accounts.

Table 1. Twitter accounts sampled, the number of Tweets sent, and number of account followers.

Account name	Beverage subsector	Tweets sent	Account followers
Bulmers Ireland	Cider	2,186	5,693
Dingle Distillery	Spirits	8,711	14,210
Guinness Ireland	Beer	6,268	70,614
Heineken Ireland	Beer	5,428	14,260
Jameson Ireland	Spirits	1,566	4,200
Metalman Brewing	Beer	9,622	8,999
O'Hara's Brewery	Beer	12,000 ^a	11,583
Orchard Thieves	Cider	1,506	7,295
Power's Whiskey	Spirits	883	3,132
Teeling Whiskey	Spirits	29,200 ^a	23,056
The White Hag	Beer	7,717	8,570
Trouble Brewing	Beer	4,049	10,142
Waterford Distillery	Spirits	6,126	5,485

Notes: Data correct as of July 2021; ^aDue to volume sent, values were rounded by Twitter.

To be eligible for inclusion, an account had satisfy the following three criteria: (1) indicate that the contents were intended for consumers in Ireland, for example by referring to Ireland in the account name/handle or bio, referring specifically to drinkaware.ie (Ireland), or listing the account location in Ireland; (2) have a blue verified badge/tick to signal authenticity (Twitter, n.d.[b]); and (3) have posted at least once in the past three months (excluding replies and Retweets). Accounts clearly targeted at a global audience or different jurisdiction (e.g. neighbouring United Kingdom) were not included, nor were accounts not obviously targeted at any specific country. No upper limit on the sample size was set but, after applying the inclusion criteria, a purposive non-probability sample of 13 accounts were identified. This covered multinational and regional producers and comprised six beer brands, two cider brands, and five spirits brands (Table 1).

Content sampled from each account and the final sample

From each Twitter account, the Window's print screen function captured the profile photo, biography, account information (e.g. location), and heading image; hereafter referred to collectively as the 'account landing page'. The 50 previous author-generated Tweets, or all Tweets since the Act was signed into law (17th October 2018), whichever came sooner, were also captured. This approach was preferred to collecting all content within a specific time frame (e.g. the past month) as it ensured that the sample was not saturated by brands who posted more frequently and did not underrepresent those who posted less frequently; the latter is plausible given that the COVID-19 pandemic may have reduced the intensity of marketing activity due to the closure or restriction of on-trade premises and cancellation of some related marketing activities (e.g. sponsored sporting or cultural events).

Tweets were manually captured using the print screen function on Windows or, if the Tweet contained a video or Graphics Interchange Format (GIF; a form of moving image that plays on a loop), the XRecorder application on a smartphone (v.2.1.0.3) (InShot Inc, 2021). Content was only

captured from the 'Tweets' section (i.e. excluding replies to other users). Retweets, including quoted Retweets, were excluded as they frequently feature content from accounts that are not always controlled by the alcohol company. If a Tweet was part of a 'thread' (successive posts designed to be read sequentially), or contained multiple images in a gallery, then all content in the thread and/or gallery was treated as one post.

Content was captured by NC in July 2021. Due to poor playback quality, a small number of video-based Tweets were recaptured in August 2021. At least 50 author-generated Tweets were obtained from 10/13 of the accounts sampled. The exceptions, with less than 50 eligible posts since the Act was enacted, were @JamesonIreland ($n=3$, Tweets), @OrchardThieves ($n=16$ Tweets), and @BulmersIreland ($n=35$ Tweets). This resulted in a final sample of 554 Tweets for coding.

Coding

Sample characteristics

For each account, data were captured on number of Tweets sent by the account and number of followers. For each Tweet, we also recorded the date it was posted (coded into month/year), whether the post was static (i.e. only text and images) or dynamic (i.e. included a video or GIF), the number of Retweets (including quote Retweets) the Tweet had received, and the number of 'likes' the Tweet had received. For 'threads', the number of likes and Retweets recorded was cumulative across all the Tweets contained in the thread. All data are correct as per the date of capture. In some cases, only rounded figures were reported by Twitter, for example accounts which had sent a large volume of Tweets.

Warnings relating to alcohol consumption, drinking during pregnancy, and fatal cancers

For each account landing page and each Tweet captured, we recorded whether they contained any of the three warnings which will be mandatory under Section 13 of the Act, about: (1) the danger of alcohol consumption; (2) the danger of alcohol consumption when pregnant; and (3) the link between alcohol and fatal cancers (each coded: Yes/No/Unclear). If they did, a free-text item collected information on warning content, design, and positioning. The term 'danger' was used in the definitions of (1) and (2) to ensure consistency to the wording of Ireland's legislation (Irish Statute Book, 2018).

Voluntary and self-regulated consumer protection messages

For each account landing page and each Tweet captured, we recorded whether they contained any voluntary and self-regulated consumer protection messages. Initially, each was coded for the presence of any message (Yes/No/Unsure) and, where this was the case, a free-text item captured information on message content, design, and positioning. Once initial coding was completed, the free-text item was used to create binary coding for recurrent themes observed in the

data, with each Tweet coded Yes/No/Unsure for the following themes: (1) drink responsibly; (2) enjoy responsibly; (3) socialise responsibly; (4) support responsibly; (5) taste responsibly; (6) 'Get the Facts. Be DRINKAWARE'; (7) responsible consumption in relation to COVID-19; (8) included brand name in the responsibility message; (9) reference to 'Dry January' or other abstinence campaigns; and (10) other/miscellaneous messages. Detailed categorisation of message type is consistent with previous research examining consumer protection messages for alcohol advertising in print magazines (Smith et al., 2014). A Tweet could refer to more than one message theme, for example 'Enjoy [Brand X] Responsibly' would be 'Yes' for both 'enjoy responsibly' and 'included brand name in the responsibility message'.

Reference to websites with public health information about alcohol

For each account landing page and each Tweet captured, we recorded whether they contained any details of, or links to, websites that provided public health information about alcohol, with the following categories: (1) no website details; (2) details of a website maintained by an alcohol company/brand; (3) details of a website maintained by an alcohol industry-funded/affiliated charity or organisation (e.g. drinkaware.ie); and (4) details of a website maintained by an independent organisation not funded by, or affiliated to, the alcohol industry (e.g. the Health Service Executive's askaboutalcohol.ie) (each coded: Yes/No/Unclear). Where applicable, a free-text item collected information on any websites cited and the design and position of the references. A Tweet or account landing page could contain reference to more than one type of website. References to brand or company websites for promotional purposes, for example online shops or other social media channels, were not coded under (2) unless it was presented as a source of public health information about alcohol.

Ethics

This article does not contain any studies with human participants performed by any of the authors and therefore full ethical review was not required. The study and methods were approved through a research ethics checklist completed for the University of Stirling's General University Ethics Panel (Project: 3043; Decision 5th July 2021).

Analysis

Data were descriptively analysed using SPSS version 27. Ranges and medians (*Mdns*) examined the number of account followers and number of Tweets sent. Frequencies examined the proportion of Tweets from each beverage subsector (beer, spirits, cider), the proportion of Tweets that were static or dynamic, and the proportion of Tweets from each month/year. Medians and inter-quartile ranges (*IQR*) examined the total number of 'likes' and 'Retweets' each Tweet had received. Frequencies also examined the proportion of account landing pages and Tweets that contained: (1)

voluntary and self-regulated consumer protection messages (both whether any message was present and, if so, which message types were featured); (2) references to websites containing public health information about alcohol (and, if so, the sources of the information); and (3) the warnings to be mandated under Section 13 (about consuming alcohol, drinking when pregnant, and links to fatal cancers).

Results

Sample characteristics

Across the 13 accounts, the number of followers ranged from 3,132 to 70,614 (*Mdn* = 8,999) and the number of Tweets sent ranged from 883 to approximately 29,200 (*Mdn* = 6,126). Of the 554 Tweets sampled, 54.2% were for beer brands, 36.6% for spirits brands, and 9.2% for cider brands. Most Tweets were posted in 2021 (78.5%), with 16.1% from 2020, 1.8% from 2019, and 3.6% from 2018. Three-quarters of Tweets (75.5%) were static (i.e. combination of text and/or images) and 24.5% were dynamic (i.e. included a video or GIF). The median number of Retweets (including quoted Retweets) was 2 (*IQR* = 1–5) and the median number of likes was 22 (*IQR* = 11–38).

Warnings relating to alcohol consumption, drinking during pregnancy, and fatal cancers

None of the account landing pages or 554 Tweets were observed to contain a warning to inform the public about the dangers of alcohol consumption or the direct link between alcohol and fatal cancers. A pregnancy warning was observed in three Tweets from Trouble Brewing (0.5% of all Tweets). All three instances related to the 'do not drink in pregnancy' logo visible on the side of the product packaging in images or videos (a circular warning with a strikethrough line over the silhouette of a pregnant women). This, however, appeared to be incidental exposure (e.g. very small or only shown very briefly) in an otherwise promotional Tweet where the packaging and/or product was the focal point. A further five Tweets from Trouble Brewing were coded as 'unsure' as it was possible this same logo was present, but it could not be clearly seen (i.e. was too small in the image or only partially visible on the side of the packaging). No account landing pages were observed to have pregnancy warnings.

Voluntary and self-regulated consumer protection messages

Just over a third of Tweets (36.3%) were observed to have a voluntary and self-regulated consumer protection message (Table 2). Most of these were either 'Get the facts. Be DRINKAWARE' (20.0% of Tweets) or messages encouraging consumers to 'drink responsibly' (10.3%) or 'enjoy responsibly' (7.0%). Seven percent of Tweets (6.9%) included the brand name in the consumer protection message, for example '#EnjoyBulmersResponsibly' or 'Taste Teeling Responsibly'. The term 'support responsibly' (3.4% of Tweets)

Table 2. Presence and type of voluntary and self-regulatory consumer protection messages observed in Tweets.

Variable	%	<i>n</i>
Contained any form of self-regulatory consumer protection message ^a	36.3	201
‘Get the facts. Be DRINKAWARE’ ^a	20.0	111
Drink responsibly or similar	10.3	57
Enjoy responsibly or similar	7.0	39
Included brand name in consumer protection message	6.9	38
Support responsibly	3.4	19
Socialise responsibly	3.1	17
Dry/January references or other abstinent campaigns	1.1	6
Taste responsibly or similar	0.5	3
Other ^b	0.5	3
Consuming alcohol responsibly in relation to COVID-19 ^c	0.4	2

Notes: Tweets could contain more than one type of consumer protection message.

^aTwo additional Tweets coded as ‘Unsure’ as they appeared to contain the ‘Get the Facts. Be DRINKAWARE. Visit drinkaware.ie’ message, but these were obscured by pop-ups in a video.

^bTwo Tweets included reference about the serving size depicted and one encouraged consumers to complete a short quiz to test their knowledge of alcohol use on Diageo’s DrinkIQ.com.

^cExcludes public health messages about COVID-19 that were not related to alcohol (e.g. wearing masks, closing distilleries for visitor tours due to social restrictions etc).

was used by Heineken Ireland in posts relating to the UEFA EURO 2020 football tournament, for which they were an official sponsor (UEFA, 2019). Other message types are summarised in Table 2. On the account landing pages, 7/13 brands contained a voluntary and self-regulated consumer protection message. These used similar message types to those already reported for Tweets (e.g. ‘Please Enjoy Guinness Responsibly’ and ‘Get the Facts. Be DRINKAWARE’).

When present in Tweets or on account landing pages, the voluntary and self-regulated consumer protection messages were frequently smaller and less prominent than promotional and branding elements visible at the same time. The consumer protection messages were also often positioned outside of prominent eye-line (e.g. in the extremities of images and videos), juxtaposed against vibrant and stimulating marketing content, not always present throughout videos (e.g. only shown at the end), and not always featured in both the Tweet and any associated multimedia content. Only one Tweet – from Guinness Ireland – focused entirely on promoting responsible drinking.

Websites with public health information about alcohol

Approximately three quarters of Tweets (72.9%) were observed to make no reference to a website which clearly contained public health information about alcohol. A fifth of Tweets (20.6%) had a link to drinkaware.ie, which receives funding from the alcohol industry (DrinkAware, 2021). Two additional Tweets were coded ‘unsure’ for this item, as it looked like the DrinkAware Ireland logo was present in an embedded YouTube video, but it was obscured from clear view by a pop-up in the video. A further 6.7% of Tweets referenced a website maintained by an alcohol brand. Most of these related to the phrase ‘Enjoy Bulmers Responsibly. Visit bulmers.ie’, although four Tweets referenced Diageo’s

drinkiq.com. No Tweet was observed to contain a link or reference to a website that provided independent public health-led information about alcohol (e.g. the Health Service Executive’s askaboutalcohol.ie or equivalent). On the landing pages, 4/13 accounts referred to a website which provided public health information about alcohol: three to drinkaware.ie and one to an alcohol brand website. Given they were often presented together, references to websites with public health information about alcohol were subject to the same design and visibility constraints as the voluntary and self-regulated consumer protection messages described above (e.g. small text, outside of prominent eyeline, and juxtaposed against stimulating marketing and branding content).

Discussion

We found that almost half of the account landing pages on Twitter for multiple alcohol brands in Ireland, and almost two-thirds of Tweets from these accounts, contained no self-regulated consumer protection messaging. No account landing page or Tweet explicitly referred to the dangers of consuming alcohol, drinking during pregnancy, the link between alcohol and fatal cancers, or websites providing independent public health information about alcohol. A few Tweets, by one brand, showed brief and incidental exposure to symbols on packaging which warned that alcohol should not be consumed during pregnancy, but this exposure appeared unintentional in an otherwise promotional post. The findings therefore suggest that, once commenced, Section 13 of the Public Health (Alcohol) Act, which will require such health information and warnings to be included in most alcohol marketing in Ireland (Irish Statute Book, 2018), will help to better inform consumers about the potential harms of alcohol when exposed to marketing communications.

The data highlight limitations with the current self-regulatory approach to consumer protection messaging in Ireland. Existing codes state that alcohol marketing should contain a message that promotes ‘responsible drinking’ (ASAI, 2016), and supplementary guidance recommends that such messages appear in both the post and associated multimedia content (CopyClear, 2019). In this study, however, most Tweets and almost half of account landing pages did not contain such messaging. The absence of consumer protection messages in individual Tweets, which are served directly to the consumer’s personal timeline (newsfeed) when a brand is followed, is an opportunity missed by alcohol companies to demonstrate adherence to simple, self-imposed rules. Even when self-regulated consumer protection messages did feature, their design and presentation reduced visibility. This included not always featuring messages in both the Tweet and associated multimedia content, not featuring messages in prominent positions, and juxtaposing messages against more stimulating marketing and branding content. Similar concerns about the presence and visibility of self-regulated consumer protection messages have also been raised for alcohol packaging (Alcohol Health Alliance, 2020; Petticrew et al., 2016) and gambling advertising (Critchlow et al., 2020).

Even when self-regulated consumer protection messages were observed in this study, such messaging was found to contain promotional elements (e.g. included the brand name or linked to wider marketing activities), indirectly encourage consumption (e.g. 'drink responsibly' or 'enjoy responsibly'), and not contain objective health information, guidance, or warnings (e.g. 'Get the facts. Be DRINKAWARE'). That multiple brands and messages promoted variants of 'responsible drinking', as is recommended in Ireland's current self-regulatory code, is concerning given that the strategic ambiguity and subjectivity of such messaging may have limited consumer impact (Barry & Goodson, 2011; DeJong et al., 1992; Jones et al., 2017; Maani Hessari & Petticrew, 2018; Roznowski & Eckert, 2006; Smith et al., 2006). The findings are therefore consistent with existing research which has challenged the likely efficacy of self-regulated consumer protection messages in print media alcohol advertising in the US (Smith et al., 2014).

Most Tweets did not reference a website with public health information about alcohol, and where they did websites were either industry-funded (drinkaware.ie) or run by alcohol companies (bulmers.ie or drinkiq.com). No Tweets were observed to reference a website providing public health information from an independent body (e.g. the Health Service Executive or equivalent), as will be required under Section 13. We did not critically examine the contents of the industry-affiliated websites observed in this study, but previous concerns have been raised about how health information and risk is communicated by the alcohol industry in general (e.g. Maani Hessari et al., 2019; Mialon & McCambridge, 2018; Peake et al., 2021; Petticrew et al., 2016, 2018; Pettigrew et al., 2016), and industry-led communications have been found to be less effective than public health-led materials (e.g. Blackwell et al., 2018; Brennan et al., 2020; Jones et al., 2017, 2021).

There are sampling limitations. Only a small, purposive, non-probabilistic sample of Twitter accounts was analysed and, although this included three alcoholic beverage subsectors (beer, spirits, cider) and both national and multinational producers, the findings may not generalise to all alcohol companies (e.g. brands observed to be actively marketing in Ireland on Twitter which did not meet the inclusion criteria). Nevertheless, the number of accounts sampled compares favourably to previous research examining alcohol marketing on social media (e.g. Barry, Padon, et al., 2018; Barry, Valdez, et al., 2018; Gupta et al., 2019; Nicholls, 2012) and was constrained by both the number of brands available to sample from and those meeting the inclusion criteria. The absence of publicly available and recent data on volume sales for alcohol also meant that it was not possible to determine how well the purposive sample reflects the brands and beverage subsectors most frequently purchased in Ireland or the relative popularity of the brands analysed among various consumer groups (e.g. young people). Such data would help overcome an important barrier for future research in Ireland. The study also only examines marketing on Twitter, and the findings may not generalise to other digital and social media platforms where alcohol is marketed in Ireland (e.g. Facebook,

Instagram, YouTube, etc.) or non-digital marketing activities (e.g. television, print media, outdoor, sponsorship, etc).

There are also methodological limitations and avenues for future research. We only focused on the presence of consumer protection messages and, where they did feature, only captured basic information on content, design, and positioning. Research providing a more detailed assessment of the design and visibility of such messaging would be beneficial, both on Twitter and for wider alcohol marketing activities in Ireland, for example assessing the proportion of available space such messages cover or the length of time they are shown in dynamic content (e.g. videos and GIFs) (Critchlow et al., 2020). The findings also offer no insight into consumer engagement with the self-regulated consumer protection messages observed or their subsequent impact on knowledge, attitudes, and consumption. Experimental research comparing consumer reactions to self-regulatory versus government-approved messaging (in this case, the messages to be required under Section 13), or assessing changes in consumer reactions to messaging pre- and post-implementation, would be beneficial. Finally, this analysis was conducted prior to the Section 13 controls being commenced. Future research examining whether the presence of warnings and reference to independent websites increases once the commencement date is announced, including during the forecasted transition period (Irish Statute Book, 2018), and to what extent marketing is compliant once the controls become mandatory, would also be beneficial.

In conclusion, Section 13 of the Public Health (Alcohol) Act should help ensure that consumers are presented with meaningful health warnings and information in alcohol marketing on Twitter in Ireland, given that such information is currently rarely present. There are limitations with the current self-regulatory approach to consumer protection messaging in Ireland, including messages not always being present, having poor visibility, not containing objective health information or warnings, and being co-opted for promotional purposes, which undermines any potential value for consumers. Section 13 intends to resolve these issues.



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Data availability statement

The data or materials are available upon reasonable request from the corresponding author.

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