

A qualitative exploration of the Thai alcohol policy in regulating alcohol industry's marketing strategies and commercial activities

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ABSTRACT

Introduction and Aims. The recognition of the association between the use of alcohol and negative health outcomes have led to the endorsement of the World Health Organization's global strategy to reduce the harmful use of alcohol. Given the capacities, capabilities and sociocultural contexts of Thailand, this study aims to examine the Thai alcohol policy against the global strategy's recommended policy measures for marketing control and identify areas for further policy development.

Methods. Semi-structured interviews were conducted with the stakeholders from three sectors: the government, academia and civil society. Their perceptions of the Thai alcohol policy in regulating alcohol industry's commercial strategies and activities were discussed. Audio data were transcribed verbatim, systematically coded and thematically analysed.

Results. Although the *Thai Alcohol Control Act* meticulously regulates the content of direct alcohol marketing, the volume of marketing and indirect alcohol marketing have become problematic and difficult for the government to address. The industry has worked to normalise the consumption of alcohol through repetitive brand exposure and their suggestion that drinking was integral for socialisation. The control of alcohol sponsorship was politically sensitive and legally ambiguous because alcohol sponsorship seemed to provide economic and social benefits and further reinforced the industry's positive image.

Conclusions. Despite the strict alcohol policy, gaps in the marketing regulations exist. Future policy development should place greater emphasis on alcohol sponsorship and branding through evidenced-based interventions. The interactions between the government and the industry should be monitored and restricted. Rigorous regulations, as seen for tobacco, are encouraged for alcohol marketing.

Keywords: Qualitative; Alcohol Industry; Marketing Strategies; Mass Communication; Thailand

INTRODUCTION

Globally, alcohol use attributed to 2.8 million deaths and 5.1% of the global burden of disease and injury in 2016 [1]. The recognition of the association between the harmful use of alcohol and negative health outcomes and socioeconomic development have led to the endorsement of the World Health Organization's global strategy to reduce the harmful use of alcohol (the global strategy) at the 63rd World Health Assembly in 2010 [2]. The global strategy contains eight guiding principles that reflect the multifaceted determinants of alcohol-related harm and the collaborative multisectoral actions for the development and implementation of effective alcohol policies at all levels. The global strategy has categorised alcohol policy options and interventions into ten target areas that are supportive and complementary to one another. For alcohol marketing (area 6), the recommended policy options and interventions are presented in Table 1.

[Insert Table 1 about here]

Since the endorsement of the global strategy, some progress has been made in alcohol policy development in many countries to reduce these alcohol-related consequences [3]. Some of these alcohol control regulations aim to restrict the supply side of alcohol which is the alcohol industry. The alcohol industry includes alcohol producers, wholesalers, distributors and retailers. The advertising companies, media companies, social media corporations and sporting agencies are not a part of the alcohol industry, but gain benefits from alcohol marketing and advertising.

Alcohol industry and the regulatory control

Increasing research suggests that exposure to alcohol marketing is associated with increased levels of alcohol consumption in young people [4, 5], which are a causal factor for intentional and unintentional injuries and other alcohol-related health conditions [3]. However, a review of compliance and complaint studies has found that self-regulatory codes are ineffective in preventing youth exposure to alcohol media communication and encourage modification towards statutory regulation that minimises the influences of those with vested interest in

policy formation [6]. However, the alcohol industry still argues that there is no compelling evidence for the association between exposure to alcohol marketing and youth drinking patterns or misuse [7]. Scepticism, doubts and concerns, resulting from the evidence of code violations, regarding the alcohol industry's ability and willingness to engage in genuine partnership to support young people's activities, remain [8].

In some regions of the world, alcohol industries play a significant role in promoting alcohol consumption. In Africa, the growing influence of the alcohol industry has led to increased availability of alcohol, marketing initiatives and price promotions [9]. Most African countries do not have legally binding regulations for alcohol marketing, leading to inefficient control of alcohol-related harm [10]. In Asia, there are a range of alcohol marketing regulatory frameworks, from the least restrictive frameworks, as seen in Japan and Laos, to the most restrictive controls, as seen in many Muslim-majority Asian countries [3]. Countries such as China, India, Laos, Thailand and Vietnam have been targeted by the alcohol industries as emerging alcohol markets [11].

Thailand's marketing regulatory control

Recreational drinking in Thailand is considered to be a recent phenomenon [12]. However, recent statistical reports suggest that Thai alcohol market is growing [13, 14]. Box 1 provides a brief overview of Thai alcohol market.

[Insert Box 1 about here]

As national efforts to reduce alcohol consumption can produce better results with the support of the global action [2], Thailand has increasingly strengthened its alcohol regulatory controls in accordance with the global strategy. The *Alcoholic Beverage Control Act* B.E. 2551 (the Act) enacted in 2008 established the Alcohol Beverage Control Committee that was tasked to oversee the monitoring and surveillance of alcohol activities in Thailand. The Act introduced a multitude of regulatory interventions, including alcohol marketing and advertising regulations similar to the recommended policy options and interventions. Section 32 of the

Act (Box 2) stipulates that alcoholic beverages sold in Thailand may not be advertised in a manner which directly or indirectly claims benefits or promotes its consumption [15]. However, paragraph one of the Section explicitly allows the logo of the product or manufacturer to be advertised. On television, illustrations of alcoholic products, the packaging and consumption of alcohol are blurred. Televised alcohol advertisements are allowed between 10 pm to 5 am and must show warning messages for at least two seconds. In printed media, the warning message must occupy at least 25% of the advertisement area.

[Insert Box 2 about here]

Thai consumers' exposure to alcohol commercial communication and awareness of alcohol control measures

A cross-sectional study conducted in 2012 found that 81.3% of young Thais believed in responsible drinking and had positive attitudes towards industry-led corporate social responsibility (CSR) activities. Almost two-thirds of young Thais believed that these CSR activities were genuine philanthropic works. Approximately 99% had positive attitudes towards sports sponsorship of alcohol companies. More than 90% of these could recall alcohol brands from alcohol advertisements they had seen. Over 80% of these young Thais have purchased alcoholic products of the brands they had been exposed to. A recent survey conducted in 2017 revealed that Thais aged 15 and above were exposed to televised alcohol advertisements the most, followed by point-of-sale advertisements and outdoor billboards [16]. Approximately 95% of these people were aware of the adverse consequences of alcohol misuse (e.g. road traffic accidents and violence); however, their awareness of alcohol control measures was low. For example, the majority of the people surveyed were unaware of the time restrictions for televised alcohol advertisements [16]. In another survey, 56.2% of people aged 12-65 were unaware of alcohol labelling regulations, which prohibits certain features on alcohol labels, such as descriptions of the product quality and pictures of athletes, celebrities or cartoons [17].

Despite strict alcohol marketing regulations in Thailand, the portrayals of alcohol in the media remain prevalent, resulting in high exposure to alcohol [18]. To strengthen current

marketing regulations, it is important to extensively explore the Thai alcohol industry's marketing strategies and commercial activities, and its role in alcohol policy formation and development. In non-Western settings, there is a comparative lack of research on alcohol marketing strategies, and relatively little public health research on the alcohol industry's many marketing activities [5]. Given the available resources, capacities, capabilities and the different sociocultural contexts of Thailand, this study aims to examine the Thai alcohol policy against the global strategy's recommended policy options and measures for alcohol marketing control and identify gaps in the current alcohol marketing regulatory control for further development.

METHODS

Study design and sample selection

Semi-structured interviews were conducted with the key stakeholders who have been actively involved in alcohol research and policy development. The respondents were from three sectors: (i) the government (policymakers); (ii) academia; and (iii) civil society. The three sectors are collectively called the "triangle that moves the mountain" as proposed by a well-known medical, public health and social scholar in Thailand, Professor Prawase Wasi [19]. The three interconnected sectors are believed to simultaneously strengthen capacity in three interrelated areas, namely political involvement (the government), creation of knowledge (academia) and social movement (civil society organisations). Pragmatic purposive sampling through policy networks and snowball referrals was used. A list of the members of the National Alcohol Policy Commission, as appointed by the *Alcohol Control Act* [15] was used for initial sample selection. The members of the Commission consisted of representatives from government agencies, non-governmental organisations, and persons whose knowledge, competence and experience pertaining to the fields of either social science, law or information and communication technology. Table 2 presents a summary of respondents' areas of work and/or expertise. Initially, six stakeholders (two policymakers, two academics and two civil society organisations) were contacted by an email. Those who failed to respond within 5 working days were followed up by telephone. All of them replied the email within a few days and accepted the invitation for an interview. Additional interviewees were referred

to by the respondents who had been interviewed. Ethics approval was granted by the Human Research Ethics committees in Australia (HE15/480) and Thailand (MUPH 2016-034).

[Insert Table 2 about here]

Data collection

The semi-structured interviews (30-60 minutes) were conducted face-to-face in Thai language at the respondents' agreed locations (e.g. their offices) between May and August 2016. An information statement and a consent form provided to all respondents were in both English and Thai to ensure that the respondents were well informed. RK explained the study and their right to withdraw from the study to the respondents and allowed them to ask questions with regard to the study. The interviews were facilitated by a topic guide containing open-ended questions that had been provided to the respondents in advance. The signed informed consent was received prior to the commencement of the interview. The interview topics included marketing and mass communication strategies used by the Thai alcohol industry, alcohol marketing countermeasures and perceptions of the government's responses to these industry strategies. Each interview was audio-recorded with the respondents' permission. All data were fully anonymised to preserve confidentiality and each respondent was assigned a code.

Data analysis

Interview recordings were transcribed verbatim in Thai after each discussion session. Data analyses were ongoing and iterative. The transcripts in Thai were read, re-read, and coded and analysed separately by RK and SN. Thematic content analysis was used to identify key themes, and the data were continually coded and refined into categories. The emerging themes, categories and concepts were then translated into English by RK and SN and discussed among the study team. Finally, the codes, themes, categories and sub-categories were refined further with the team until no new themes or categories emerged.

RESULTS

Alcohol industry's communication strategies

All respondents asserted that the Thai population perceived drinking as part of everyday socialisation. They stated that some Thais believed in the health benefits of alcohol, although there was no apparent scientific evidence of this. Nonetheless, they stated that the industry has argued that alcohol-related harm could be avoided when alcohol is consumed in moderation. Respondents also noted that the industry supported alcohol as a normal part of everyday socialisation by portraying alcohol as an 'ordinary product' among a diverse range of beverages in the market.

"...the industry is saying that overconsumption of anything (either alcoholic or non-alcoholic) causes problems. They make alcohol look like an ordinary product, but it's certainly not. Unlike other ordinary commodities, alcohol has no health benefits whatsoever." – S2

Respondents believed that the industry continued to portray alcohol as an acceptable part of Thai society through the normalisation of alcohol consumption. Firstly, the industry has frequently used the same branding for both alcoholic and non-alcoholic products to increase exposure to alcohol advertising, with the aim of influencing brand preference and increasing consumption. Respondents added that as there were two different sets of law (commercial law and alcohol control regulations) with regard to advertising, the control of alcohol brand advertising has become more complicated. This is because the commercial law fails to prohibit the use of same branding between different categories of products. Hence, the alcohol industry has circumvented the alcohol advertising restrictions by registering their alcoholic and non-alcoholic products under the same branding.

"The law doesn't say anything about brand-sharing. The alcohol industry is abusing the loophole of the Alcohol Control Act and the commercial law." – A2

Secondly, alcohol companies have increasingly employed CSR activities and youth-orientated activity sponsorships, such as sporting events and music festivals to enhance the companies' image and brand. Respondents noted that, unlike other products, the sale of

alcoholic products in Thailand relied heavily on the positive image of the companies or brands rather than the quality of the product, per se. Respondents also noted, however, that CSR-themed advertisements were less prominent than in the past. The local alcohol companies increasingly focus on friendship-themed advertisements and proudly promote their products as a representation of nationalism.

“It’s in the alcohol industry’s master plan to paint itself as through mass media and marketing communication as a saint, a Good Samaritan, eye-catching advertisements as well as the nationalism-themed advertisements.” – S3

To attract young consumers, alcohol advertisements generally feature young people’s interactions and lifestyles and advocate for alcohol consumption as a right of individuals. A respondent from the civil society sector noted that this type of advertisement dismisses the relationship between alcohol use and social problems, but endorses it as an individual’s responsibility.

“The campaign says ‘live your life’, it’s saying that you can do anything, drink anything. It’s like saying that ‘I wanna drink and it has nothing to do with society’. It encourages the drinkers to think that it depends on individuals.” – S3

The respondents from the government sector added that the extent of the industry’s responsible drinking campaigns is rather minimal compared to that of sports and entertainment sponsorship. As sporting and entertainment events have increasingly attracted young individuals in recent years, the industry has simultaneously focused on sponsoring youth-orientated activities, including the use of brand advertising. The industry has also supported government-funded social activities to build trust with the people and the government.

“The activities that the alcohol industry focuses on are normally involved youth and adolescents such as sport. Thai alcohol brands have been featured on the

jerseys of many domestic and international sports teams. They also invest a lot in music marketing in every province, One Province One Concert.” – G2

Thirdly, respondents raised concerns about the industry’s increasing attention on digital marketing. They added that although the alcohol marketing regulations have been enforced on all types of media, the monitoring system of the industry’s activities on digital and social media was troublesome and negligent.

“Although the law’s been enforced, there’s no one to monitor (alcohol advertising) on social media...Social media is like a disingenuous world...” – A2

The government responses to the alcohol industry’s activities

The government’s responses to the industry’s activities have developed over time. A respondent from the government sector stated that before the Thai Alcohol Act was enacted in 2008, the government had initially proposed a bill to totally prohibit alcohol advertising; however, the proposal failed at the legislation stage. Although he was involved in drafting the bill, he declined to discuss the reasons for this failure due to its political sensitivity. Such a failure could be due to the technical difficulties in certain areas. For example, overseas live television broadcasts featuring alcohol advertisements were exempted because of the technical difficulty in censorship.

“Because of alcohol-related harm is twice that of tobacco, the bill we proposed totally ban all alcohol advertisements. However, there were negotiations at legislation level and the bill was modified to allow a few exceptions, making it partial ban instead. Due to technical issues, the third paragraph of the Section 32 allows live broadcasts from overseas to feature alcohol advertisements” – G2

Despite being unsuccessful with the total ban, the respondents from the government sector claimed that the government has progressively focused their attention on counter-advertising campaigns and public policies to reduce alcohol-related harm. Furthermore, the role of non-

governmental organisations (NGO) was recognised as a significant force in the success of these counter-advertising campaigns. These NGOs, although, lacked an authoritative power, are able to constructively criticise the government's performance. Conversely, government agencies tend to avoid criticising one another so as not to create conflicts among them.

“We have been campaigning and developing interventions and public policy to denormalise the use of alcohol such as the campaign called. These policies show our commitments to control alcohol-related problem and to show that we’ve recognised that alcohol is not an ordinary commodity...The government and NGOs need to support each other because we both have strengths and weaknesses.” – G2

Besides the counter-advertising strategies, the government has been pursuing litigation against those that have violated the regulations. The government has realised the potential implications of alcohol brand advertising shared between alcoholic and non-alcoholic products and was seeking clarification of this matter from the court. A respondent from the government sector added that while the Ministry of Commerce has allowed the alcohol producers to register a variety of alcoholic and non-alcoholic products under the same branding, the Ministry of Public Health has strenuously argued that brand sharing could be used as indirect alcohol advertising.

“(The alcohol industry) uses their alcohol brands in advertising and mass media communication. Therefore, we shouldn’t allow them to register (different products) under the same brand to avoid misleading customers. The Ministry of Commerce is still insisting to register them...The case is now with the High Court”. – G2

Furthermore, among many strategies and interventions available, the government proposed to strengthen alcohol marketing controls by introducing pictorial alcohol labelling. The

government was collating evidence to support their proposal, by referring to the effectiveness of the use of tobacco pictorial warnings.

“(Warning labelling) was proven to be effective in reducing cigarette smoking. I don’t think we need to debate whether how much (warning labelling) could reduce alcohol consumption. The success of the use of warning labelling is that young people would realise the danger of alcohol.” – G3

Moreover, a respondent from the government sector added that the government agency that was responsible for alcohol controls was expected to perform too many responsibilities with comparatively little funding.

“The government’s allocated budget (to manage alcohol control) is about 10 million baht annually. For small alcohol companies, they already spend more than 10 million baht a year on alcohol advertising. We don’t even have to talk about (how much) the biggest alcohol companies in the country (spend on advertising).” – G2

DISCUSSION

The findings of this study suggest that the Thai alcohol marketing regulations are facing difficulty in many areas. At one end, the industry is increasingly exposing their customers (and potential customers) to various commercial activities on mass communication platforms. At the other end, the industry is simultaneously attempting to undermine government regulatory controls by circumventing marketing regulations in the form of indirect marketing and interacting with the government in the form of supporting government-organised social activities.

Regulating alcohol branding strategies

Although the content of direct alcohol marketing is meticulously regulated by the Act, the volume of marketing and indirect alcohol marketing is problematic and intractable. The Act

explicitly allows alcohol producers to advertise their brands and logos [15]. These branding strategies is a much debatable topic in Thailand. The industry exploits this loophole by using the same branding for both alcoholic and non-alcoholic products called brand sharing, which can be viewed as a circumvention of marketing regulations. Brand sharing refers to a strategy that a company utilises corporate reputation and identity to launch new products or services that benefit from previous marketing efforts [20]. For alcoholic beverages, the brand name, emblem, trademark, logo, distinctive colour combinations or any other distinctive feature may be used for other non-alcoholic products or services. This study has found that branding strategies undermine the effectiveness of alcohol advertising regulations because they potentially obscure the distinct difference between alcoholic and non-alcoholic product advertisements, resulting in increased exposure to alcohol advertising.

Regulating alcohol industry's sponsorship and CSR activities

In addition to branding strategies in advertisements, alcohol advertising often becomes integrated into youth-orientated activities, such as sports and entertainment event sponsorships. Sports and event sponsorships featuring alcohol brands in Thailand are reportedly growing. The results of this study are in line with other studies that have demonstrated that the global alcohol industry is moving its focus from direct to indirect [21]. Similar to Western countries, the use of brand marketing is becoming common during broadcasts of sporting events, this reaching much larger audiences [22, 23]. In New Zealand, for example, audiences of television broadcasts of five international sporting events during the summer of 2014-2015 were exposed to up to 3.8 alcohol brand exposures per minute [23]. In some countries in Europe and the Americas, in-game alcohol brand appearances were three times greater than the out-of-game brand appearances during the television broadcasts of the 2014 FIFA Football World Cup [22]. This study also finds that sport and event sponsorships in Thailand have been politically sensitive and legally ambiguous because of the exemption for brand advertising [15]. It is possible that the economic and social benefits gained from these sponsorships has increased the acceptance of alcohol industry sponsorships.

Additionally, although the use of CSR activities is notably less prominent than sports and event sponsorships as noted by the respondents in this study, these CSR activities are still used by the alcohol industry. While the industry claims that corporate sponsorship is based on philanthropic purposes [24], this claim is doubtful and likely to be a form of marketing strategy. In Latin America and the Caribbean, more than half of the industry-initiated CSR activities were found to have a strategic marketing potential [8]. In the US, popular youth brands are often used in corporate sponsorship of youth activities and have a higher number of sponsorships in a variety of integral aspects of American culture, such as sport, music, the arts and entertainment [24]. These sponsorships can also create positive associations with culture and generate alcohol brand capital. It is apparent that CSR activities provide similar benefits to those of sports and event sponsorships and reinforce positive images of the industry. In Thailand, a cross-sectional study conducted in 2012 found that most young Thais had positive attitudes towards industry-initiated CSR activities. Approximately 60% of these young Thais did not believe that such activities were intended for commercial purposes and 55% supported the companies that conducted CSR activities [18]. However, the effects of the industry's activities on young Thai's drinking behaviours remain to be explored.

Introducing new alcohol packaging and labelling requirements

This study also finds that the Thai government has started to act as a defender of its citizens, rather than taking the role of mediator between the alcohol industry and public health advocates by continually strengthening its efforts in alcohol marketing control. The government has focused on the packaging and labelling of alcoholic beverages as a form of marketing. Research on alcohol advertising and alcoholic product packaging and its appeal to young consumers has started to grow in recent years [25, 26]. Despite a lack of substantive evidence of alcohol pictorial warnings, Thailand has sought to further control alcohol warning labels by proposing to introduce pictorial warnings on alcohol containers to the World Trade Organization (WTO) Technical Barriers to Trade Committee in 2010 [27, 28]. However, such a novel intervention was opposed by several members of WTO. Some WTO members questioned the legitimacy of the pictorial warning labels and cited them as an unnecessary restriction of international trade [27, 29]. Other legal arguments against

Thailand's proposal focused on the lack of evidence that alcohol pictorial warning could reduce alcohol-related harms. This suggests that the opposition by some WTO members may be well explained by the willingness to protect the alcohol industries at the expense of the harms caused by alcohol in Thailand [27]. Although stronger evidence is needed to substantiate the effectiveness of warning labels to transmit health messages to the public, especially the drinkers, the success of pictorial cigarette warning labelling is inspiring [30].

Interactions between governing bodies and the industry

This study further reveals that one of the guiding principles of the global strategy that encourages all involved parties to have the mutual responsibility and act in ways that do not undermine the implementation of alcohol policy has not fully been appreciated. Although the Act has successfully established a governing agency to conduct monitoring and surveillance of alcohol commercial activities and any infringements in Thailand, the inter-agency cooperation is questionable. The tensions between health goals and other significant national agendas, such as economy and social policy issues remain. Furthermore, other cost-effective strategies to reduce alcohol-related harm, such as a total advertising ban, may not be plausible in Thailand [31], because the industry has covertly played a significant role in the direction and formulation of policy, particularly in alcohol marketing regulations. There is evidence that the industry has formed alliances with other sectors, such as trade groups (including hotel and tourism associations) and consumer groups to shape the news and agendas to influence alcohol marketing regulations [32].

Recommendations for future policy development

Evidence-based interventions are required for Thailand to successfully strengthen the controls of alcohol marketing strategies and commercial. Firstly, Thailand needs to revise its exemption for brand advertising as it is being used by the alcohol industry to undermine the effectiveness of advertising regulations. As alcohol is a cross-cutting issue, the established Alcohol Beverage Control Committee, which is comprised of various agencies, should increase interactions among these agencies. The Committee may also consider conducting regular trainings for capacity building, collaboration, monitoring, review and information

dissemination, as implemented by the Western Australian Alcohol and Drug Interagency Strategy 2017-2021, to reinforce the importance of this on-going matter [33]. Secondly, the scientific study of the industry-led CSR activities are unacceptably underdeveloped [34]. Therefore, the effects of industry-sponsored and CSR activities, including the use of brand sharing in these activities on drinking attitudes and behaviours should be prospectively investigated in Thailand to construct stronger arguments for stronger control of the industry's activities. Thirdly, Thailand together with other international communities, needs to closely examine the direct links between alcohol warning labels and its effectiveness in preventing alcohol misuse, to overcome the opposition of those with vested interest. The success of cigarettes graphic warning labels provides an example of an effective strategy of a non-price policy to block industry's influence [30]. Fourthly, although the relationship between the government and the alcohol industry in Thailand is not as apparent as it is in some countries, such as the United Kingdom [35], the Thai government should refrain from accepting all kinds of support from the industry so as to prevent the industry from using CSR as a means to frame alcohol issues, define problems and guide policy debates as employed by transnational alcohol corporations in other countries [36]. Lastly, as alcohol marketing strategies are simultaneously evolving and expanding to newer media, e.g. social media [37], the government should employ a similar strategy, such as using influencer marketing (a word-of-mouth marketing in digital format), to counter-advertise or nullify the industry's strategic attempts [38].

Limitations

A few limitations need to be addressed in this study. First, it should be acknowledged that the perspectives of the government agency are only of the public health sector that leads alcohol control in Thailand. Nevertheless, perspectives of other stakeholders, such as non-public health government agencies, consumers, and the alcohol industry, though outside the scope of this research paper, are equally important and should be explored in future studies. It is recognised that there may be difficulties in obtaining meaningful data or accessing information that is not publicly available from the alcohol industry. However, interviews with the industry is a viable alternative to gain understanding of alcohol strategies where access to

internal documents is not possible [39]. Second, the mass communication and marketing strategies of the alcohol industry presented in this study may be relevant mostly to the settings where statutory regulations are implemented. In the countries with co-regulation or self-regulation frameworks, the industry's commercial activities may be more explicit. Nevertheless, this study provides an understanding of the alcohol industry's tactics used in a restrictive marketing environment and offers possible venues for policy development in countries with less restrictive policies.

CONCLUSIONS

The Thai alcohol industry has employed similar approaches to those of the global alcohol industry, using philanthropic works and youth-orientated sponsorships. In a more restrictive and hostile environment for alcohol marketing, such as that found in Thailand, the industry uses repetitive exposure to alcohol brand advertising and engages in youth-orientated activities. The future directions for alcohol policy should focus on disassociating alcohol use and young people. Firstly, in the interest of public health objectives, the forms of engagement between the government and the industry should be carefully monitored and restricted to minimise the industry's influence on future policy development. Secondly, the government should revise its strategic alcohol policy to align all relevant government agencies. Thirdly, rigorous policy measures, as seen for tobacco, should be considered for alcohol marketing control. Finally, social media should be subjected to meticulous statutory control because of the increasing industry's attention on social media.

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Table 1. Policy options and interventions for the control of alcohol marketing as recommended by the World Health Organization

(a) setting up regulatory or co-regulatory frameworks, preferably with a legislative basis, and supported when appropriate by self-regulatory measures, for alcohol marketing by: <ul style="list-style-type: none">(i) regulating the content and the volume of marketing;(ii) regulating direct or indirect marketing in certain or all media;(iii) regulating sponsorship activities that promote alcoholic beverages;(iv) restricting or banning promotions in connection with activities targeting young people;(v) regulating new forms of alcohol marketing techniques, for instance social media;
(b) development by public agencies or independent bodies of effective systems of surveillance of marketing of alcohol products;
(c) setting up effective administrative and deterrence systems for infringements on marketing restrictions.

Source: World Health Organization (2010).

Box 1. Brief overview of Thai alcohol market

The revenue of Thai alcohol market was US\$5318 in 2018. Spirits were the largest segment with a market volume of US\$2638 [13]. However, the revenue growth and sales volume of beer were higher than those of spirits, because the price per unit of beer is lower than spirits. Beer remains the dominant alcoholic drink category of which Boon Rawd Brewery Co Ltd and Thai Beverage PCL sharing 58.5% and 32.5% of the total beer market by volume in Thailand, respectively [18]. The Thai alcohol market is oligopolistic; three major alcohol companies accounted for 92% of the Thai alcohol market value in 2008-2011 and 79% belonged to domestic companies [40]. Alcohol companies promote alcohol in Thailand themselves and sell 100% of their alcoholic products in Thailand offline due to legal prohibition of online alcohol sales [15]. Retail distribution of alcoholic drinks is split evenly between various grocery retailers [13]. Hypermarkets and supermarkets are the most important channels, followed by convenience stores, independent small grocers and drinks specialist.

Box 2. Section 32 of the *Alcoholic Beverage Control Act* B.E. 2551

“Section 32

No person may conduct an advertisement of an alcoholic beverage or display the name or the logo of such beverage in a manner directly or indirectly claiming the existence of certain properties of or encouraging a person to consume an alcoholic beverage.

A manufacturer of an alcoholic beverage, irrespective of its kind, may conduct an advertisement or act of public relations only in a manner that provides information and knowledge beneficial to society, without any picture of an alcoholic product or its package, except a picture of its logo or logo of the manufacturer. This shall be subject to a ministerial regulation.

The provisions in paragraphs one and two shall not apply to advertisements of foreign origin.”

Source: Royal Thai Government Gazette (2008)

Table 2. Respondents' areas of work and/or expertise

Category	ID Number	Organisation's work and/or expertise
Government	G1	Alcohol policy
	G2	Alcohol policy and enforcement under G1
	G3	Government-research unit hybrid organisation
Academia	A1	Alcohol industry's behaviour
	A2	Media communication of alcohol industry
	A3	Alcohol research in Thailand and health economics
	A4	Alcohol research and international collaboration
Civil society	S1	Drunk-driving watchdog
	S2	Alcohol information and awareness in Thailand
	S3	Alcohol-related harm watchdog