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AUDIOVISUAL AND DIGITAL ALCOHOL MARKETING: REGULATION AND YOUTH EXPOSURE IN FRANCE



CREDITS

The comparison of International Alcohol Control Policies with a focus on Audiovisual and Digital Alcohol Marketing (CIPPAL-ADAM) was carried out by a wide partnership of research-oriented organisations. The interpretations, analyses, and conclusions presented in this report are solely those of the authors and do not necessarily reflect the views of the OFDT. The OFDT assumes no responsibility for the opinions expressed or for any errors or omissions contained herein.

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IN A FEW POINTS

The CIPPAL-ADAM study provides key insights into youth's awareness of alcohol advertising, the role of marketing in drinking, and the impact of national regulations. This monograph deals with results for France. Hereafter, the executive summary is adapted from an artificial intelligence-assisted summary (NotebookLM™).

- **A stringent but challenged regulation alcohol advertising.** While French regulations on alcohol advertising in 2024 remain among the most restrictive in the world, evolving media landscapes and marketing strategies continue to challenge the limits of the Évin law. This context calls for continued advocacy on behalf of public health, as well as constant scrutiny of advertising content and in-depth legal review.

- **Role and limitations of self-regulation.** In France, self-regulation of alcohol advertising serves as a complementary layer to strict legal controls, helping economic stakeholders interpret complex rules, promote socially responsible behaviour and protect their industry's image. But it remains voluntary and uneven, requiring stronger enforcement or oversight from public authorities or civile society in some areas.

- **Perception of national regulations and their impact.** Despite France's Évin law being one of the world's most stringent alcohol advertising regulations, young people perceive a significant disconnect between the law's intent and its practical application, particularly in the digital realm. They generally possess limited knowledge of the specific regulations, especially regarding online channels and the protection afforded to minors.

- **Youth's awareness of exposure to alcohol advertising.** When interviewed, young people in France tend to **underestimate their exposure** to alcohol advertising and actively use avoidance strategies like fast-scrolling. However, the survey data reveal a **widespread actual exposure**, with 75% reporting seeing positive portrayals of alcohol and 87% seeing alcohol advertising on digital or audiovisual media. They often **confuse commercial advertising with public prevention campaigns**, which blurs their understanding of the true intent of messages.

- **Impact of implicit marketing on awareness**. Beyond explicit ads, **implicit, integrated, or algorithmic marketing** forms a less visible yet powerful influence on young people's exposure and consumption norms, often escaping conscious recognition. Content from "close" contacts, including **influencers with small to medium audiences**, is perceived as more persuasive than institutional or commercial messages, indicating the strong impact of social and cultural identification.

- **Role of alcohol marketing in drinking alcohol.** Young people generally express scepticism regarding the direct impact of alcohol advertising on their own drinking habits, often attributing influence to others ("third person effect"). They overwhelmingly cite taste (%), the social and euphoric nature of alcohol during celebrations (36%), and the sensation it provides (26%) as their primary motivations for drinking. Advertising ranks as the least significant factor (3%).

- **Marketing as reinforcement, not initiation**. Alcohol advertising appears to function more as a reinforcement of pre-existing consumption habits and cultural norms rather than a primary trigger for new drinking practices or purchases. The **family unit often serves as the initial point of exposure**, normalising products like wine as part of culture, while **peers play a crucial role in shaping consumption** norms and encouraging new drinks. Media portrayals in music videos, series, and films also consistently depict alcohol as a social enabler or a marker of maturity.

Challenges to regulatory effectiveness. The authorisation of online alcohol advertising in 2009 created a significant loophole, with platforms like Instagram®, Snapchat®, and Tiktok® being viewed by young people as largely unregulated spaces where age restrictions are easily circumvented (e.g., by falsifying age) and enforcement is difficult. This is exacerbated by limited resources for monitoring advertising dissemination on digital platforms and persistent lobbying from the alcohol industry to weaken existing laws.

Opportunities for improvement. The study highlights the **urgent need to modernise the legal framework** to effectively address algorithmic advertising, influencer partnerships, and social media campaigns. Furthermore, **fostering cross-border collaboration** and expanding **media literacy education** are crucial steps to strengthen the control system and better protect young people from pervasive digital marketing strategies.

INTRODUCTION

“The World Health Organisation (WHO) and its Member States regard strategies to regulate the commercial availability of alcohol as essential public health measures. (WHO Regional Office for Europe 2021). At global level, the ban on the sale of alcohol to minors (generally aged under 18) and restrictions on alcohol advertising are essential levers, and the rigour with which these provisions are applied is a crucial issue. The health authorities recommend regulating marketing practices to protect minors, in particular limiting the use of certain media and the subjects that can be exploited in advertising (PAHO 2017, WHO 2018, WHO 2019). In Europe, these measures can vary from country to country, as can the types of alcohol to which they apply. As self-regulation by alcohol producers and advertisers is contrary to their economic interests and therefore unlikely to be effective in protecting minors from advertising (Pierce, Stafford et al. 2019), bodies independent of the alcohol industry should be entrusted with the task of monitoring compliance with the law in this area.

Given the multifactorial complexity of the responses implemented, it is essential for states to better distinguish what can be learned from specific national experiences and trajectories in the implementation of alcohol control policies. Thus, in November 2024, with the financial support of the *Fonds de lutte contre les addictions* (FLCA, French Fund for combatting addiction), the French Monitoring Centre on Drugs and Addictions (OFDT) launched a comparison of International of Alcohol Control Policies (CIPPAL), with a focus on Audiovisual and Digital Alcohol Marketing (ADAM). This study is referred here by the acronym ‘CIPPAL-ADAM aimed at describing and comparing the factors and patterns of young people's exposure to audiovisual and digital alcohol marketing in six European countries: Finland, France, Ireland, Italy, Lithuania and Switzerland. The CIPPAL-ADAM study was carried out over 2024 and 2025, by six European organisations with an expertise in mixed methods (universities, advocacy or research bodies), following a common methodology under OFDT coordination.

This monograph summarises the results of the CIPPAL-ADAM study for France after describing the common mixed methodology applied and the specific characteristics of the French samples. It first includes contextual data on the French system of regulation and control of audiovisual and digital advertising for alcohol. It then analyses the attitudes of young French people towards this type of advertising, as part of a qualitative study. Thirdly, the monograph presents the results concerning young people's exposure to digital and audiovisual alcohol advertising, based on a quantitative online survey.

Alcohol consumption among French teenagers

In **France**, alcohol remains the most widely experimented substance, including among adolescents, even though its diffusion has been declining among young people for a decade: 80.6% in adolescents aged 17 in 2022 vs 89.3% in 2014 (OFDT 2023). At age 17, 58.6% of youth drank in the past month (vs 72.0% in 2014). However, the prevalence of regular drinkers (10 times per month) has substantially decreased over the past 10 years (7.2% in 2022 instead of 12.2% in 2014). In 2017, 31% of 17-year-old French youth reported having been exposed to an image, video or advertising related to alcohol on the Internet on a weekly if not daily basis (Mutatayi and Spilka 2019).

METHOD

The common mixed method

The general objective of CIPPAL-Alcohol Marketing is to show how young people in the six countries compare in their way of identifying and being exposed to audiovisual and digital marketing techniques. In other words, the study assesses the empowering capacity (marketing awareness) and the protective nature (less exposure) of different control systems, from a comprehensive statutory system (Lithuania) to less restrictive statutory systems (Finland, France) or more liberal systems appealing to self-regulation by economic players (Ireland, Italy, Switzerland). To this end, investigators have pursued four operational objectives to be declined in each country case:

- Describe the national regulations – legal/statutory restrictions and/or industry self-regulation –- on alcohol marketing (AM) via audio-visual and digital media and the related control and enforcement framework.
- Assess the knowledge, acceptability and attitudes of minors and young adults regarding the national AM regulation and how they perceived its efficacy/role in reducing incentives to purchase and consumption, peer or family pressure to drink alcohol, etc.
- Analyse how minors and young adults perceive their exposure to AM via the audiovisual media and the Internet, considering various explanatory variables (age, gender, drinking status).

Investigators have implemented a mixed method based on a documentary analysis on the regulations, sociological interviews on norms and perceptions and a web survey on ADAM exposure and related factors. The recruiting and data collection methods were submitted to the internal ethical procedure of each partner.

The review of the national regulation system of alcohol marketing was based on agreed guidelines with regards to types of sources, bibliographic databases, keyword sets and search strategies. The selection of references followed the PRISMA rules for traceability.

Data collection has targeted young people aged between 16 and 19 for semi-structured interviews. Selection criteria based on age (minors and adults), gender, alcohol consumption and socio-economic background (parents' profession) were applied when recruiting interviewees, in order to achieve a diversity of profiles. Multi-channel recruiting was used (via social media, by direct soliciting or via a poll firm) and prior parental consent was required for minor respondents. Interviews were audio-recorded, transcribed and anonymised. Data was processed with Computer-Assisted Qualitative Data Analysis Software (Atlas or Nvivo 14-15).

For the web survey, samples varied in number between countries, with three larger samples for Finland, France and Italy. Sampling was based on common quotas applied to respondents belonging to access panels, with a minimum target of 30% minors in each national sample and an age range extended from 15 to 21, for reasons of feasibility. Common quotas referred to gender (men, women) cross-referenced with age (minors, adults), activity (schooling vs employment). For the three larger samples, additional quotas related to more detailed categories of schooling, the size of urban unit, region and the parents' occupation were applied. Final data were weighted on the basis of these quota criteria.

Incentives worth 15 euros on average {Casswell, 2012 #203;Friant-Perrot, 2022 #204;Murray, 2018 #206;Noel, 2016 #205}were awarded to young interviewees and panel respondents to the web survey.

The French sampling

The final samples of the set of interviews and web survey are respectively detailed in Tables 1 and 2, for France.

Table 1. Sampling for interviews-France

		N
Total sample		22
Age	16-17	12
	18-19	10
Average age	/	17.4
Gender	Male	11
	Female	11
	Non binary	0
Area	Rural	4
	Urban	18
Last month alcohol use	Never	9
	1-2 times	11
	Once a week or so	2
	Everyday or so	0
Lifetime non drinker	/	3
First drink	With relatives	13
	With friends	6
	Never	3
	Alone	0
Average age (first drink)	/	14.8
Drunkenness	Yes	8
	Not	14
Declared economic situation	Not well-off	3
	Fairly well-off	17
	Very well-off	2

Table 2. Sampling for the web survey-France

		N	%
Total sample		1 024	100
Age	15-17	303	30
	18-21	721	70
Average age	/	18,3	
Gender	Male	501	49
	Female	505	49
	Non binary and other	19	2
Male	15-17	143	14
	18-21	358	35
Female	15-17	155	15
	18-21	351	34
Non binary and other	15-17	6	1
	18-21	12	1
Drinking status	Non drinkers	405	40
	Drinkers	619	60
	Occasional drinkers	144	14
	Regular drinkers	475	46
Socio-economic categories	Superior category	400	39
	Intermediate category	557	54
	Lower category	66	6
Activity	At school, university	715	70
	Higher education	275	27
	General secondary school	272	27
	Other secondary school	168	16
	Employed	238	23
	Inactive	71	7

THE LEGAL FRAMEWORK OF ALCOHOL ADVERTISING REGULATION

Alcohol is a major public health concern in France, associated with chronic diseases, cancer, addiction, and road accidents. Alcohol and tobacco public use, manufacture, selling and promotion are historically extensively regulated. While alcohol public use and manufacture, are historically extensively regulated selling rules and promotion legal restrictions underwent a major turning point in the 1990s. Foundation and rationale of alcohol advertising regulations.

In France, wine is a key part of a unique cultural context and economic life, which creates **tensions** between public health goals and industry interests. Hence the law applied to the field of alcohol advertising seeks a **middle ground**, allowing advertising for local products while maintaining strict limits on content and reach. The foundation and rationale of **alcohol advertising regulations in France** are rooted in **public health protection**, **youth prevention**, and the need to **balance commercial freedom with social responsibility**.

These regulations are primarily established under the Law no. 91-32 of 10 January 1991 on the control of tobacco use and alcohol abuse (*Loi n°91-32 du 10 janvier 1991 relative à la lutte contre le tabagisme et l'alcoolisme*), named **Évin law** (**Loi Évin),** after **Claude Évin**, the then Minister of Health. The Évin law builds on earlier laws regarding health and advertising but introduced stricter and clearer boundaries, making it a landmark French public health law and the cornerstone of the alcohol (and tobacco) advertising regulations in France. The Évin Law is codified in Code de la santé publique (Public Health Code, PHC).

This chapter presents the French legal framework for alcohol advertising and the self-regulatory system in place. The main stakeholders, both allies and opponents, in this specific area of alcohol advertising and the potential harmful effects on health are also described.

Rationale

This regulation was established with the ultimate goal of protecting minors from alcohol supply and marketing. The Évin Law applies to any drinks over 1.2% alcohol by volume (ABV). It covers not only alcohol advertising and sponsoring, but also it restricts minors' access to alcoholic products, by prohibiting the sale of alcohol to minors, and prohibiting the serving or free offer of alcohol to minors in catering establishments, even when parents' consent to their minor's consumption.

In the field of alcohol advertising, the rationale of the law extends over several grounds:

- Protect Public Health.

  The law aims to **limit excessive consumption** and the **normalisation of alcohol** in media and social contexts;

- Protect Youth and Vulnerable Populations.

  The law acknowledges that young people are particularly susceptible to the influence of advertising. By restricting where and how alcohol can be advertised, the law aims at reducing youth exposure and thus **delaying the onset of consumption**. To this end, the law reduces the range of media authorised to carry advertising;

- Prevent Encouragement to Drink.

  The French law seeks to **reduce the attractivity of alcohol products,** by restricting authorised contents in advertising;

- Balance Freedom of Expression and Public Interest
in order to **preserve economic activity** (e.g., wine production and tourism) while **minimizing societal harms**, the law does not impose a full ban on alcohol advertising but allows **informative advertising** (excluding persuasive or emotional appeals);

- A major strength of the rules introduced by the Loi Évin is that they cleverly overturn the principle of general authorisation of advertising accompanied by specific bans, which had prevailed until then, and instead defines the authorised media and content in a restrictive manner (Basset and Rigaud 2021). Therefore, anything that is not expressly authorized is prohibited, which, for a time, preserved the population from the advertising carried by new media, such as digital media when they emerged.

French law does not cover the entire field of alcohol marketing, but targets certain aspects, in addition to advertising. The PHC extends the restrictions on advertising media and content to indirect advertising packaging and provides for limitation for sponsoring. Ministry of Health provides policy direction and oversees national public health policy, including prevention of alcohol abuse. It may propose changes to the Law for the control of alcohol advertising.

Implementation story

In France, the regulations on alcohol advertising originated in the 1980s. Until 1980, the law established a general authorisation regime for advertising wines, beers and ciders, as well as French rums and spirits, but with prohibitions on aniseed-flavoured and foreign spirits. After France was condemned in 1980 by the European Court of Justice for its regulations deemed discriminatory, all types of alcohol became eligible for advertising. Advertising then became ubiquitous in all media, particularly private media with the advent of new FM radio stations and authorised private television channels. The law of 30 July 1987 prohibits advertising on public and private television channels, in publications aimed at young people, and in sports venues, but advertising remained authorised in cinemas, in the press and on billboards. Faced with the difficulties of enforcing this law and the numerous ways of circumventing it, experts and prevention associations relaunched the debate and campaigned for the law to be tightened up (Basset, Rigaud et al. 2021). A number of doctors and non-governmental organisations (NGOs) campaigned against children's exposure to alcohol advertising on television (Craplet 2005). In 1988, when Claude Évin was appointed Minister for Solidarity, Health and Social Protection, he called upon five medical professors, dubbed the ‘Five Wise Men’ by the press, to submit a report on alcoholism, smoking and road traffic collisions (Berlivet 2013). This report recommended concrete measures, including a total ban of tobacco advertising and a partial ban of alcohol advertising.

The economic players and certain members of parliament and senators from the wine-growing regions were strongly opposed to these conclusions, arguing the lack of scientific evidence of the link between alcohol advertising and alcohol consumption at the time; they also pointed to the risk of a reverse effect through an increase in alcohol consumption, as had been seen in other countries that had introduced bans (Delaneau 1990). By rallying public opinion and journalists, and with the support of other ministers, Claude Évin finally succeeded in passing these restrictions on alcohol advertising in the so-called Evin law, adopted in January 1991.

Since its adoption, the law underwent a number of amendments. While some changes have been adopted in favour of greater protection for young people, with the extension of the ban on the sale of alcohol to purchasers aged between 16 and 18, the overall changes over the last 35 years have tended to liberalize advertising restrictions. Under pressure from the wine and alcohol industry lobbyists, whose voice was echoed by various parliamentarians, decisive breakthroughs have been voted.

First, in 1991, plans to set up a special fund that would use 10% of alcohol advertising expenditure to finance preventative action never materialized. In 1994, under the pressure of detractors of the Évin, advertising, which for a time had been excluded from the public space, was reintroduced in public transport and expanded outside wine-growing regions (Berger, Mauffret et al. 2000). In the end, digital alcohol advertising found its way into France only through the legal apparatus. In 2005, the wine lobby obtained legal authorisation to include references to appellations of origin and awards, in addition to the colour and olfactory and gustatory characteristics of the product (Basset and Rigaud 2021). This extension to appellations of origin has allowed references to human factors and characters (men or women, winegrowers, bartenders, etc.) to be introduced. Yet people are more likely to win public support and encourage drinking. They are effective vehicles for reinforcing advertising messages, more so than simply depicting a bottle or can. In 2009, online alcohol advertising is finally authorised by, ironically, a territorial health law, known as the Bachelot Law (loi n° 2009-879, despite strong opposition from NGOs (Braillon and Dubois 2009), excepted on sport websites and websites targeting young people.

Faced with advertising restrictions, the wine lobby's arguments about the sector's difficulty in referring to wine in the press and the damaging consequences for wine tourism, foreign trade and employment led to a further blow to the Loi Évin (Gallopel-Morvan, Spilka et al. 2017, Basset and Rigaud 2021). In 2016, the modernising Health-Care System Law, enacted on 26 January 2016 authorises producers of alcohols with a quality appellation or linked to a production region, to cultural, gastronomic or regional heritage to exploit a wide range of promotional subjects: terroir, production area, geographical indication, know-how, cultural, gastronomic or landscape heritage, etc. (art. L.3323-3-1).

Regulations on alcohol advertising in force in 2024

In the field of alcohol advertising, Évin Law contains three core measures: authorised medias (article L3323-2 of PHC), limitation of authorised content (article L3323-4 of PHC) and mandatory disclaimer related to health risk (article L3323-4 of PHC). These legal provisions cover direct and indirect advertising. Indirect advertising is defined as “propaganda or advertising in favour of an organisation, a service, an activity, a product or an object other than an alcoholic beverage which, by its design, presentation, use of a name, trademark, advertising emblem or other distinctive sign, is reminiscent of an alcoholic beverage” (3article L3323-2 of PHC).

Authorised media

- The **media authorised** to carry alcohol advertising are strictly defined in article L3323-2 of the French Public Health Code, in line with the general principles of prohibiting media that affect everyone and of preventing exposure of young people. The initial principle was to exclude advertising from intrusive media, a principle from which public billboards, reintroduced in 1994, derogate. The list of authorised media, that was amended by law in 2009 to include the New information and communication technologies (NICTs), is as follows:
- Adult press: in publications not aimed at minors;
- Radio: during designated hours when youth audiences are minimal, as determined by the Conseil d'État;
- Billboards and posters: under strict conditions, including size limitations (e.g., posters inside sales outlets must not exceed 0.35 square meters).
- Online platforms and digital media (internet and applications), with the exception of websites aimed at young people or dedicated to sport and physical activity, provided the advertising is neither intrusive nor interstitial. However, the definition of a young audience has been left to the discretion of producers and advertisers. An advertisement is interstitial or intrusive if it interferes with or hinders the

reading or viewing of content, such as an advertisement between two stories or an advertisement that can only be skipped after several seconds of forced viewing (Li, M. et al. 2002);

- Catalogs and brochures sent directly to consumers, containing only factual information about the product;
- Inside points of sale, with a maximum sign requirement of 0.35 m2, and on objects used for alcohol consumption (e.g. glasses) (Article R3323-4);
- Delivery vehicles, on which branding is allowed but limited to product descriptions and company information (name, logo…);
- In pubs, restaurants and hotels, equipment, crockery and objects strictly reserved for the operation of the establishment, the professional activities of staff and the use of customers during their visit or stay in the establishment may bear the name of an alcoholic beverage (art. R3323-4);
- For and within traditional festivals and fairs devoted to local alcoholic beverages;
- In favour of museums, universities, brotherhoods or oenological initiation courses of a traditional nature as well as in favour of presentations and tastings, under conditions defined by decree.

Any medium not listed in the Évin Law is banned: on television, in cinemas, festivals, cultural and sporting events (sponsoring), etc. Any new communication technology appearing on the market would not be eligible to carry alcohol advertising, without a specific amendment to the law.

Authorised content and health warning

The second measure controls advertising content. **Authorised content** is limited to factual information on alcohol products and their objective qualities (article L3323-4 of PHC). Basically, product information can focus on alcoholic degree, composition, origin, production methods, and consumption modalities. In contrast to the explicitly authorised content, a range of imagery is banned such as depictions of people consuming alcohol or associating alcohol with social success, performance, or sexual prowess are forbidden. The goal of not authorising anything other than objective subjects is to avoid glamorising or glorifying the association with alcohol or associating it with success in any form. Consequently, attractive advertisements with positive, evocative images and/or text associating alcohol with pleasure, glamour, success, sport, masculinity and femininity, or sexuality, opinion leaders, etc. are not allowed (Gallopel-Morvan, Spilka et al. 2017).

The third pillar of the law on alcohol advertising in the French context is the display of a **mandatory health warning** relating to the health risk on all alcohol advertising (and on all alcohol sales units such as bottles, cans and packaging). Mandatory disclaimer “Abuse of alcohol is dangerous for your health” (“L’abus d’alcool est dangereux pour la santé”) (article L3323-4 of PHC).

Any **sponsoring** operation with the purpose or effect of direct or indirect propaganda or advertising in favour of alcoholic beverages is prohibited (art. L3323-2). The extent of the restrictions applicable to sponsorship should, in theory, protect France from the activities of “alibi” brands. An alibi brand is a registered trademark owned and operated by an alcohol company to replace the parent brand in areas where its activity is limited or regulated. In most cases, the alibi brand exploits the distinctive identity references of the parent brand (graphics, logo, colour combination, slogan elements, etc.), without quoting it directly.

Promulgated on 9 June 2023, **Law no. 2023-451** (Président de la République française 2023) “aimed at regulating commercial influence and combating the abuses of influencers on social networks” introduces a legal definition of commercial influencers as "any natural or legal person who uses their reputation to communicate content to the public by electronic means with a view to directly or indirectly promoting goods, services or any cause whatsoever, in return for an economic benefit or a benefit in kind the value

of which exceeds thresholds set by decree, engages in the activity of commercial influence by electronic means". It requires paid partnerships to be mentioned in order to ensure greater transparency for followers, with influencers now required to clearly display the words ‘advertising’ or ‘commercial collaboration’ on their promotional content. The law regulates the use of images that have been retouched or generated by artificial intelligence. It also prohibits the promotion of sensitive products, such as cosmetic surgery or nicotine, and underlines the obligation for influencers to comply with legal regulations concerning the advertising and promotion of goods and services, such as the ‘Evin’ law, the consumer code, standards relating to fatty, sweet and savoury products, etc. A specialised unit of the Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF) is responsible for enforcing these laws. Offending content creators can face up to two years' imprisonment, a fine of up to 300,000 euros and a ban on exercising commercial influence.

The Digital Services Act (DSA) and Digital Markets Act (DMA) aims at creating a safer digital space – from simple websites to internet infrastructure services and online platforms (online marketplaces, social networks, content-sharing platforms, app stores and online travel and accommodation platforms) – where the users’ fundamental rights are protected and create equitable conditions for businesses. The DSA has five main areas of action, which may have implications for online alcohol advertising, namely the protection from dangerous goods and illegal content and the limitation of targeted advertising.

Self-regulation by economic stakeholders

In France, self-regulation of alcohol advertising by industry players aims at helping industry players interpret and comply with legal obligations in a responsible and consistent manner. It complements the legal framework set out in the Public Health Act, without derogating from it, by providing **guidance in gray areas** where the law is less specific (e.g., influencer marketing, online sponsorships) and promoting **industry-wide norms.** For the sake of industry players’ legal safety, self-regulation promotes **proactive compliance** rather than reactive legal enforcement and it may encourage manufacturers to go beyond legal expectations.

Self-regulation hinges on **voluntary commitments and internal codes of conduct** adopted by the economic players to:

- Avoid violations of the law;
- Promote responsible marketing practices;
- Demonstrate social responsibility;
- Maintain a good public image.

Apart from setting out guidelines or codes of conduct, self-regulation mechanisms can consist of training on legislation in force and responsible practices, compliance audits, monitoring member behaviour and review of advertising campaigns before their release.

In France, the main economic stakeholders that are involved in self-regulation in the field of alcohol advertising are:

- The International Chamber of Commerce (ICC), through the lens of its code of ethics;
- Advertisers and media agencies, in particular the Professional Advertising Regulation Authority (ARPP, *Autorité de Régulation Professionnelle de la Publicité*) which is administered by representatives of the sector and funded exclusively from the private funds of most of the top 100 advertisers and other economic players, including major alcohol manufacturers.
- Alcohol industry trade associations – such as the association "*Avec Modération !*" (formerly "Vins et Société »), the French Federation of Spirits (FFS*, Fédération Française des Spiritueux*) and the National Interprofessional Committee for Wines with Designation of Origin (CNIV, *Comité National des*

Interprofessions des Vins à Appellation d'Origine) – have not published guidelines on advertising. However, alcohol brands willing to broadcast advertising in the French market may refer to ethic code and guidance provided by the ICC and the ARPP.

- There is no indication that big online platforms like **Meta, Google, YouTube**, etc., have defined their own recommendations, in order to limit youth exposure to digital alcohol marketing, in the French context.

The ICC code of ethics

The International Chamber of Commerce (ICC) has served as the authoritative rule-setter for international advertising since the 1930s. It provides comprehensive guidelines for responsible alcohol advertising through its Framework for Responsible Alcohol Marketing Communications (ICC 2019). This framework interprets how the ICC's overarching principles can be applied to address the unique aspects of alcohol marketing, emphasizing social responsibility and ethical practices, especially towards vulnerable groups. It also underlines that any national self-regulatory code that is more restrictive than the ICC Code should take precedence.

- not feature minors or individuals under legal purchase age, neither person likely to be perceived as such, drinking alcohol;
- not feature settings, music, games, language, characters or personalities, that are “primarily appealing” to minors, i.e. being more attractive to minors than to persons of legal purchase age;
- not make promotions, prizes or games linked to alcohol brands, including on digital media, accessible to minors;
- include age affirmation mechanisms on alcohol brand controlled websites, using reasonably available technology intended to limit access by minors.

Following social responsibility principle, alcohol advertising should:

- should portray alcohol products and drinkers in a responsible manner, then not depict situations excessive consumption or intoxication;
- not suggest intoxication as a socially acceptable conduct, as part of responsible social experiences or a subject for amusement;

In line with the principle of health and safety, alcohol advertising should:

- reflect moderate and responsible alcohol drinking, considering both the amount consumed and the context of consumption;
- not portray people in situations or activities in which drinking would be unsafe, especially when engaging in any activity that requires a high degree of alertness or when driving while intoxicated.
- not refer to “any health, fitness or weight-control claims except as a relevant and truthful reference to official guidelines or recommendations, or as otherwise permitted by law”.

The action of the ARPP in relation to alcohol and digital advertising

In France, the **ARPP** plays a special role in alcohol advertising self-regulation because of its mission, which is to act in favour of fair, truthful and healthy advertising, in the interests of professionals, consumers, the general public, while reconciling consumer protection and the freedom to undertake and create. This entity has developed a range of soft law tools, from guidelines to specific measures like consultation and training. Though ARPP cannot impose legal penalties, its **reputation-based**

enforcement is influential among brands and agencies. The "soft law" system implemented by the ARPP has three associated bodies: a think-tank (Advertising Ethics Council, CEP), a consultation body (Advertising Parity Council, CPP) and a control body for monitoring the application of codes of good practice in advertising (Advertising Deontology Jury, JDP).

Basically, the ARPP assists professionals in drawing up recommendations which they are free to adopt, over and above legal constraints, after consultation with its consultation body (CPP). It offers a voluntary pre-clearance service for alcohol ads against both the law and ethical standards and, downstream, it may verify that advertising complies with its own recommendations. Within the scope of digital alcohol marketing, the ARPP has drawn up two sets of recommendations, on alcohol advertising and digital advertising respectively.

ARPP's recommendations on alcohol advertising

The ARPP provides for ethical guidelines that align with the French law on alcohol advertising control and also echoes the ICC's code of ethics (ARPP 2015). Its so-called "Alcohol advertising Code" sets out general principles and specifications on content and media as well as few marketing approaches like trade naming, professional animation activities and patronage. In this code, ARPP's recommendations have been extended to marketing communications, not the sole area of advertising. Further guidance is also provided with regards to professional animation activities, patronage, commercial naming of alcohol products, packaging and distribution.

Marketing communication for alcohol must be responsible and not encourage excessive drinking or criticize abstinence. It should clearly present the nature and alcohol content of beverages without glorifying low or high alcohol levels. Alcohol must not be portrayed as therapeutic, performance-enhancing, or a solution to problems. It should not be linked to personal success (romantic, athletic, sexual, or social), maturity, luck, courage, or risky activities like driving or using dangerous machines.

Recommendations remind that marketing communication must not target minors. It should not feature or include minors, use content appealing to them (real or fictional), or appear in media (whether press, radio or online websites) where less than 70% of the audience is reasonably expected to be adults aged 18 or older.

Recommendations explicate legal provisions on health message and authorised media. Written alcohol advertisements must include a clearly visible, bold, horizontal health message in a contrasting colour and minimum size, with space from the ad's edge (adjustable for format). ARPP presents a standard phrase for health warning which is in fact a combination of the compulsory message "Alcohol abuse is dangerous for health*"* (*"L'abus d'alcool est dangereux pour la santé"),* with a traditional leitmotiv of the French alcohol manufacturers "consume in moderation" ("*à consommer avec modération*"). Nonetheless, ARPP specifies that this sentence can be cut down to the first part only for space constraints. Radio ads must use: *"For your health, beware of alcohol abuse"* (*"Pour votre santé, attention à l'abus d'alcool").* Advertisers follow legal media rules and avoid outdoor alcohol ads in French sports venues during events.

ARPP's recommendations on digital advertising

In 2021, the ARPP re-edited transversal recommendations on digital communication with the aim of supporting ethical and responsible advertising, including in the area of Brand Content and responsible influencing (ARPP 2022). This update aims to ensure that digital advertising is more ethical, transparent and respectful of users and current social issues. The recommendations reaffirm the need of applying existing ARPP rules concerning: image and respect for the individual; protection of children and adolescents; sustainable development and eating habits.

Online advertising must comply with all content and target rules and require age verification (under-18 access is blocked). Access to the brand's websites must be refused to any Internet user who claims to be aged under 18.

Digital advertisements must reflect a strong sense of **social responsibility,** avoid misleading claims and **respect fair competition** principles. **Misleading or manipulative messaging** about the nature of the product or service, the identity of the advertiser and the actual terms of the offer**, including faking endorsements,** is prohibited. Using a person's **image or voice without consent**, especially via **deepfakes is prohibited** All key information (such as conditions, limitations, prices) must be **clearly visible, readable or audible,** and easy to understand. In short, digital advertising must be transparent, respectful, accurate, and never misleading, then ensuring **consumer trust** and promoting **responsible communication**. Any advertising content must be **instantly identifiable** as such and avoid confusion with non-advertising content. Advertising must not imitate editorial content or software messages. If not obvious, it must include a **clear label** indicating its commercial nature.

All advertising must be clearly identifiable, regardless of its form. The public must be able to immediately and unambiguously recognise that it is an advertisement. It is prohibited to design advertisements in a way that **confuses the public**, such as mimicking the visual style of **non-advertising content**, like system alerts or software messages. In summary: **transparency is mandatory** – if an ad is not obviously identifiable, it must be **clearly, immediately, and intelligibly labelled as advertising**. Two distinct scenarios are possible:

- If advertising is clearly identifiable, based on its format (e.g., banner, video ad) or the obvious promotional nature, then no additional indication is required.
- If advertising is not clearly identifiable, then an explicit disclosure must be added when the ad appears within editorial or informational content (articles, videos, social media, etc.), to clearly presented it as advertising from the outset, in a readable, audible, and understandable manner. In the case of more complex formats or when the format prevents immediate identification (e.g., interactive, audio, or immersive formats), identification must follow specific rules outlined by ARPP in an appendix of its recommendations.

Additionally, the ARPP monitors the marketing collaboration practices of French content creators. and has developed several educational tools for these influencers and their agents to promote more audience-friendly and transparent marketing. The Responsible Marketing Influence Certificate is an inter-professional initiative that certifies that a content creator (influencer) has completed a training on the legal framework in force, as well as the ARPP's ethical and professional recommendations. Since 2024, the Responsible Marketing Influence Certificate has had a European dimension, under the impetus of the European Advertising Standards Alliance (EASA). The ARPP offers certified influencers a quarterly meeting called "The Certified Creators Club" ("*Le club des créateurs certifiés*"), which is free of charge and organised in conjunction with the Union of Influence and Content Creators (UMICC, *Union des métiers de l'influence et des créateurs de contenu*). At last, a new online consultation service called "*Allô Influence responsible?*" was launched on 1 October 2024. Its objective is to offer personalised and responsive expertise on issues related to the compliance of commercial collaborations and best practices in influencer marketing (ethical and legal rules), provided by lawyers specialising in communication, consumer and digital media law.

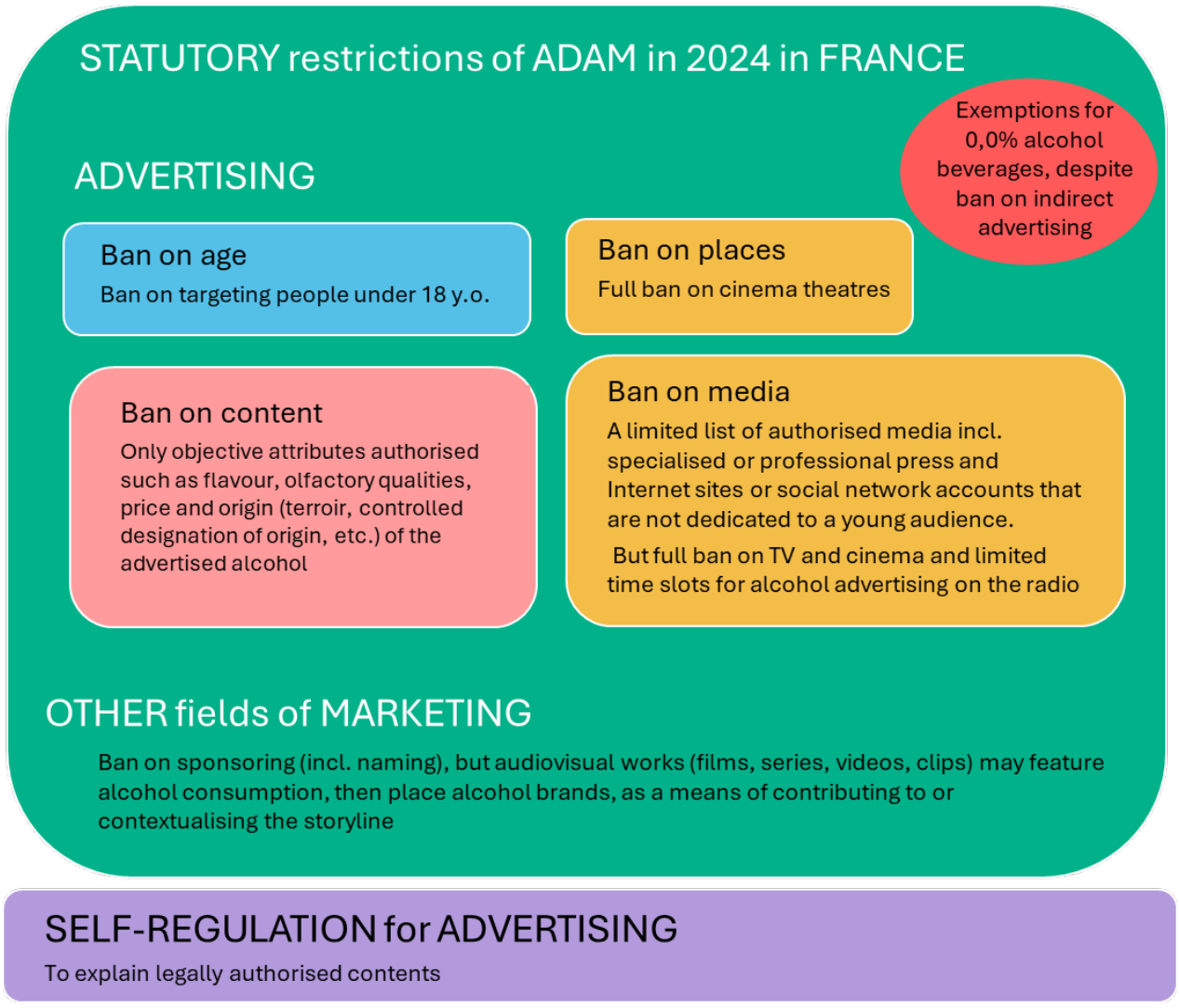
Limitations of self-regulation

The system of self-regulation implemented by the ARPP is quite consistent and complements the provisions of the Public Health Code and the ICC's code of ethics. However, compliance to self-regulation guidelines is voluntary so not all actors participate or comply uniformly. No legal sanctions for violating self-regulatory codes. Members violating voluntary commitments can face reputational consequences or exclusion from the association.

Some members of the ARPP are both judge and judged, being both funders and applicants (Lecas, Simon et al. 2019). Besides, although they are presented as independent, the members of the JDP (ARPP's control body), who come from civil society, are paid by the ARPP when they deliberate (Lecas, Simon et al. 2019).

The JDP quickly issues a response (generally within a month of the complaint being lodged), but this is detrimental to the adversarial procedure because. Indeed, when the JDP decides to examine the complaint, the parties have to submit their arguments by the same deadline without knowing those of the opposing party or the additional elements of the complaint and therefore without being able to respond to the (new) arguments raised during the proceedings (Lecas, Simon et al. 2019).

Synopsis of the regulation on alcohol marketing in 2024



Control systems and enforcement in 2024: digital surveillance & complaint-based enforcement

Authorities with supervisory remits

There is no dedicated state agency for the whole alcohol advertising surveillance, or solely for digital advertising. The control and enforcement systems of alcohol marketing regulation in France, especially for digital marketing, involve a combination of state authorities, regulatory agencies, self-regulatory bodies, courts and civile society. Dedicated NGOs play a major role in surveillance and judicial intervention. Enforcement of the statutory restrictions in the digital sphere presents new challenges due to the transnational nature of online platforms, but the French state is adapting through monitoring, legal action, “soft law” and partnerships.

Within **Ministry of Health**, the Directorate-General for Health (DGS, *Direction générale de la santé*) implements and monitors public health policy initiatives, including those addressing alcohol harm. it validates awareness campaigns that are developed by the French Public Health Agency (*Santé publique France*). With regard to alcohol advertising, no specific communication action has been undertaken to highlight the role of marketing in alcohol consumption, or to promote public awareness, particularly among minors, of the regulations and their rationale in the French context.

Within **Ministry of the Economy**, the Directorate-General for Competition, Consumer Affairs and Fraud Control (**DGCCRF**, *Direction générale de la concurrence, de la consommation et de la répression des fraudes*) falls under the is responsible for enforcing consumer and advertising law. DGCCRF investigates, conducts online audits and may sanction violations, including unlawful alcohol marketing on digital platforms.

The remit of the **Audiovisual and Digital Communication Regulatory Authority** (Arcom, *Autorité de régulation de la communication audiovisuelle et numérique*) is to “protect freedom of communication, protect works, ensure respect for individuals and the public, regulate the technical and economic aspects of the sector and take action in the general interest and to promote social cohesion” (https://www.arcom.fr/nos-missions). In the face of transformations in communications, Arcom also aims to “better protect citizens, and in particular young people, from the new challenges posed by digital technology”.

Despite the existence of these services and authorities, the State delegates advertising surveillance to NGOs, such as Association Addictions France, Avenir Santé for digital advertising. These sentinels from the civil society monitor digital campaigns and file complaints. Citizens can also report violations. These NGOs lodge civil claims with the ARPP's control body, i.e. the Advertising Deontology Jury (JDP, *Jury de déontologie publicitaire*) or with the courts.

The JDP may receive complaints about recently broadcast (less than two months) commercial communications (or non-commercial communications, for example, to promote charitable causes or public projects). It cannot take up complaints on its own initiative. The JDP issues public opinions but does not impose penalties. Although its opinions are non-binding, their publication on the ARPP website and social networks constitutes a reputational lever that encourages the disputed companies to take them into account.

Judiciary and administrative Courts adjudicate cases brought by regulators, NGOs (e.g., Association Addictions France) or individuals. Courts can demand the removal of content (i.e., cessation of advertising), fines up to €75,000 under the Évin Law or 50% of the amount spent on the illegal operation. Additional penalties may also be considered such as the prohibition on the sale of the alcoholic beverage that was the subject of the illegal operation, public apologies or corrective measures.

Figure 1. Main stakeholders of the enforcement of alcohol advertising control in France

Entity	Role
Ministry of Health/DGS	Policy direction and coordination of national strategy.
DGCCRF	Investigates, sanctions, and removes illegal alcohol marketing content.
ARPP	Provides voluntary guidance, ethics monitoring, and influencer education. Issues opinions on referrals and exercises reputational persuasion.
NGOs (e.g. Association Addictions France)	Exercise surveillance/monitoring, civil enforcement, and public awareness campaigns.
Courts	Enforces the Évin Law in legal disputes, especially involving digital content.

Supportive communication or social marketing

In France, no communication or social marketing campaign has been implemented by the government to support and explain alcohol advertising restrictions and laws to the general public or economic players. Nevertheless, some NGOs advocate for more extensive control and enforcement of alcohol marketing through monitoring reports and awareness-raising brochures. Several research teams are committed to assessing the marketing and lobbying techniques developed by the alcohol industry with the aim of improving knowledge on their impact, raising public awareness and supporting in public health decision-making.

Strengths and weaknesses

The French Alcohol advertising control system (AACS) is **public health-oriented**, with a strong emphasis on reducing alcohol-related harm and protecting **vulnerable populations, especially minors,** minors and young adults being more impressionable and at higher risk of developing harmful drinking habits. The French AACS is cited by WHO as an effective framework to prevent youth's exposure to alcohol advertising (WHO 2022). From the public health perspectives, the strengths and weaknesses internal to the French AACS systems and its key players can be summarised as follows.

The identified strengths of the French AACS are:

- The AACS is **enforced by law**, therefore violations of statutory restrictions can result in fines and other penalties, ensuring compliance.
- The fundamental strength of the French law on the control of alcohol advertising lies in the fact that it defines **authorised rather than prohibited media**, which in the first instance excludes any new media that are not explicitly listed as authorised (Basset and Rigaud 2021).
- A **comprehensive regulation** defines strict rules about where and how alcohol can be advertised by defining formally authorised media and content for alcohol advertising.
- **Clear Boundaries** are provided for, limiting advertising to objective product information (e.g., origin, composition, production method), therefore banning subjective lifestyle and emotional appeals.
- The law has been upheld in courts multiple times. This **judicial backing** by courts reinforces its legitimacy and deterring challenges from alcohol industry stakeholders.
- A **consistent self-regulation** framework of alcohol advertising exists in France, mainly based on the ARPP. The ARPP plays an important role in France in terms of self-regulation, offering soft law tools to supplement legal provisions, clarify them and support alcohol advertisers in their corporate social responsibility efforts. Although it has no power to impose sanctions, the ARPP can however use its reputational influence.

The weaknesses are internal to the French AACS. They are related to the legal loopholes or to the enforcement system in force. Those weaknesses are:

- Opponents often invoke the **complexity** of the law and the **ambiguity** of its application. The law is often pointed out as vague and difficult to interpret, which allow interpretation and to some extent leads to inconsistent enforcement. These criticisms deal with, for example, to the notion of 'advertising': what qualifies as 'advertising' in the modern media (e.g. in relation to influence marketing)? Alcohol **industry and advertisers** also incriminate the **ambiguity of the scope of** "objective information" in advertising in reference to lifestyle branding or cultural references. While denouncing ambiguity, advertisers exploit legal **loopholes**.

- Regulatory bodies have a l**imited enforcement capacity** as they lack resources for **monitoring advertising dissemination, especially with regards to online platforms** or foreign-based media that French consumers can access. Enforcement gaps reduce the law's effectiveness, especially concerning real-time media like social networks and targeted advertising.

- Regulatory bodies have **limited enforcement capacity** because they lack the resources to monitor advertising, particularly with regard to online platforms or foreign-based media to which French consumers have access. Enforcement gaps reduce the effectiveness of the law, particularly with regard to real-time media such as social networks and targeted advertising.

- Regulations do **insufficiently cover digital marketing**, leaving influencer marketing and user-generated content under-regulated (Association Addictions France 2024).

- The self-regulation framework has certain limitations: its **voluntary** and **non-coercive** nature, the '**judge and judged**' approach and operation based on a **partially truncated adversarial procedure** (Lecas, Simon et al. 2019). Indeed, not all advertisers uniformly participate in or comply with self-regulation. Members of the ARPP are both funders and applicants and ARPP pay the members of its control body (JDP) when they deliberate. The JDP (ARPP's control body) swiftly operates. The disadvantage of the JDP's rapid turnaround is that it truncates the opposing procedure.

Opportunities and threats

It is interesting to draw up a table of the opportunities and threats that lie in the external forces and threats influencing the French alcohol advertising control system. These opportunities and threats may be related to environmental, social or socio-cultural factors. Opportunities are:

- France has the **resources** to conduct **large-scale media campaigns** that can raise awareness of the power of digital marketing, non-obvious advertising, and the persuasive capacity of both commercial communications from influencers and content produced by internet users.

- There is a strong **Public Health alignment** of alcohol advertising control policies with WHO recommendations for reducing alcohol-related harm, contributing to efforts to decrease rates of alcohol-related diseases, injuries, and social harms.

- A consistent **corpus of research** studies has shown that restrictive alcohol advertising laws can contribute to a long-term decline in consumption, especially binge drinking and early initiation. Such conclusions may support Public Health decisions to improve alcohol control system and related laws.

The list of identified threats outside the AACS is significantly longer than the list of opportunities. It essentially involves the offensive strategies of alcohol manufacturers, through their lobbying activities.

- **Legal Challenges from Industry.** The wine and alcohol industry is economically and culturally influential in France and often makes the case against stricter interpretations or expansions of the law (Gallopel-Morvan, Spilka et al. 2017, Basset and Rigaud 2021, Inserm 2021). Therefore. **Powerful alcohol lobbies**, especially from the **wine sector**, frequently challenge regulations as threats to **cultural heritage and economic interests**. Such cultural and economic arguments fuel public and political pressure to foment complacent application of the law and exceptions.

- Alcohol industry lobbyists make constant efforts to dilute the law or create exceptions, particularly in the context of tourism and gastronomy. **Economic interests often outweigh public health goals**, especially in the case of digital marketing or sports sponsorships**.**

- If the alcohol lobbies and their supporters in the political arena portray law as outdated or **paternalistic, especially in the eyes of young people, or anti-French culture**, especially regarding wine, law may lose **public support**, which is essential for long-term viability.

- EU trade and internal market rules may be used to **weaken national-level restrictions**, particularly if deemed barriers to commerce. Such potential conflicts with EU laws on free trade and services and risk of e**rosion of national AACS** may particularly emerge for foreign alcohol brands.

- **Circumvention via International Media:** French consumers (especially youth) are increasingly exposed to alcohol advertising via **international channels**, **streaming platforms**, and **sports broadcasts** not governed by French law. Such accessibility to International online content may bypass French regulations, especially from social media influencers and streaming platforms

In summary, the French alcohol advertising control system, centred around the **Loi Évin**, stands as a robust public health measure that prioritizes societal well-being over commercial interests. Its **strength lies in its clarity and preventive nature**, offering a globally recognised model for responsible regulation. While France's alcohol advertising regulations in 2024 remain among the most restrictive globally, evolving media landscapes and marketing strategies continue to test the boundaries of the Évin Law, prompting ongoing public health advocacy and legal scrutiny.

However, the **limited adaptability of Laws to the digital landscape** fuels legal tensions, particularly within the EU context. The mainstreaming of online advertising and influencer marketing presents renewed challenges, due to their ephemeral nature and widespread dissemination, which make monitoring them both difficult and crucial. Therefore, **modernizing the legal framework** to address online platforms and fostering international cooperation could strengthen are at stake. In this context, concerns persist regarding the enforcement of alcohol advertising restrictions and youth exposure.

The review highlights a few areas for consideration in the field of digital marketing advertising control / Regulation. They relate to law objects, international collaboration at scientific and policy levels and new developments in responses to develop. These pathways for improvement consist in:

- **Modernising** the law to address digital and **algorithmic advertising**, **influencer partnerships**, and **social media campaigns** is likely to **close regulatory loopholes. It** may improve the efficiency of laws on digital platforms and its relevance in the digital age.
- **Cross-border collaboration** within the UE should offer opportunities to share best practices for enforcement. Collaborating with EU and WHO initiatives can help align policies on cross-border alcohol advertising and digital content regulation.
- The French Public Health Agency is increasingly involved in complex communication strategies, particularly through recurring social marketing campaigns. A promising pathway is the expansion of the scope of action to develop **media literacy** and school-based education, reinforcing the goals of the advertising restrictions.
- Further collaboration to encourage healthier industries (e.g., tech, sustainability) to sponsor events previously reliant on alcohol companies may also contribute to reinforce alcohol advertising control system.

YOUTH'S PERCEPTIONS ON ADAM AND ITS ROLE IN ALCOHOL DRINKING

Digital culture and attitudes towards digital advertising

Being all internet users, the young people who were surveyed reported multimodal use of the Internet and social networks (IRS), for entertainment, socialisation with content sharing, or for educational purposes. Many had a rather consumerist approach and viewed contents more than they created them. Overall, they showed a fairly good understanding of the targeting mechanisms they were subject to, referring to the metaphorical "algorithm" that deciphered their preferences. Although the respondents were or had been heavy users of IRS, they often displayed a critical attitude towards these media, describing them as "alienating" and abundant, where the best and the worst could intertwine.

Generally speaking, the respondents reported a digital environment saturated with commercial solicitations. The most direct or overly visible forms of advertising were quickly identified as such and were subject to selective attention from young people, who spontaneously ignored or circumvented them. Many mentioned avoidance techniques such as fast scrolling to "skip" sponsored stories on Instagram.

> *"These are adverts that just appear between videos. I haven't really paid attention to them. I ignored the video."* (FR_02_F_16_non-drinker)
>
> *"Often, I'll skip straight away if there's an advert… Well, there's the option…"* (FR_09_M_18_monthly drinker)

The young people interviewed sometimes acknowledged, without always being able to explain, that certain content was "pushed" to them by the platforms, based on their tastes or browsing history. Some thus mentioned how their "profile type" would have been identified, leading to the suggestion of compatible content likely to appeal to them.

> *"Maybe I'm a profile that might be interesting to target. In the sense that I'm part of the young generation. Maybe, necessarily, I've already done searches related to parties, friends… I think there are lots of databases that can prove my profile matches what the brand is looking for."* (FR_03_F_18_monthly drinker)
>
> *"On social networks, I really like watching cooking, because generally, these are short videos and you quickly see the result, so I like it, it entertains me. And so, as I said, there was probably something with wine, so then it goes into alcohol, and maybe the algorithm makes me get more alcohol ads than others might. […], because necessarily with cooking videos, you also have wine tastings. For example, if they make meat or fish, there's usually wine that goes with it, because it's French cuisine, and these are the ones I see afterwards."* (FR_05_F_19_monthly drinker)

Advertising and marketing: what came most to mind?

The most remembered

The respondents recalled few specific elements of the adverts they saw, either due to the avoidance techniques mentioned or a lack of attention paid to the subject, so that the reconstruction of memory often happened in stages and by contextual cross-referencing. The failure to memorise often concerned the brand promoted but could also relate to the type of alcohol itself.

> *"Yes, it's a bit of a vague memory. But I don't know, exactly. I must have seen it was vodka and remembered it, but I couldn't tell you why. It didn't stand out to me that it was an advert for vodka."* (FR_06_F_18_non-drinker)

The most memorable types of adverts were those seen repeatedly in public spaces (urban billboards, particularly in metros, bus stops). Television was also a mentioned medium, even though many young people said they hardly used this medium and that alcohol advertising was theoretically prohibited on it. Adverts were seen during advertising spots, during family viewing sessions or during sports broadcasts.

> *"[…] I see it [the advert] repeatedly. That is, I take public transport twice a week, to go to my parents' house and come back from my parents' house. And it's been there for almost a month now, so yes, it's stuck in my head."* (FR_04_M_19_monthly drinker)
>
> *"Because I've already seen it several times, I often see it when I watch TV, it often appears in advertising spots."* (FR_20_M_16_non-drinker)

Content seen in digital spaces, while less memorable in detail, was nevertheless more engaging, potentially leading to the expression of appreciation. Young people readily mentioned TikTok® or Instagram®, as well as friends' stories or influencer accounts that caught their attention. Websites and accounts dedicated to cooking recipes or, more specifically, cocktail recipes, regularly emerged from stories about the latest promotional alcohol images remembered, among both drinkers and non-drinkers. Certain alcohol brands particularly stood out in the respondents' discourse (Desperados™, Heineken®, Jack Daniel's™, Skol™…), especially due to their embeddedness in cultural universes close to them (such as rap, fantasy genre or popular series). **The impact of advertising thus partly relied on a resonance effect between the image of the promoted product and pre-existing cultural practices and alcohol consumption**. Young people more easily remembered adverts for beers, spirits, or sugary drinks they actually consumed, while wines or traditional aperitifs were rarely mentioned. Thus, the narratives suggested that the advertising impact functioned more as a reinforcement of consumption habits than as a trigger for new purchasing or consumption practices.

> *"Yeah, I knew it. There's a rapper, he talked about it, and… otherwise, I don't think I would've known it that well. You don't commonly see Jack Daniel's™, at least not at parties, for example."* (FR_09_M_18_monthly drinker)
>
> *"For me, I think adverts can affect me: if it's a brand I already consume, I might say: 'Yes, that looks good, I'm going to try it.'"* (FR_05_F_19_monthly drinker)

Main features and motives for remembering

When respondents talked about what caught their attention in alcohol adverts, they most often cited the visual and auditory aesthetics of these communications. They said they were sensitive to bright colours, bottle designs, light effects, as well as striking sounds (like a deep voice or an identifiable jingle).

> *"There were a lot of colours. There was catchy music and the editing was quite funny."* (FR_21_F_17_monthly drinker)
>
> *"I remember it because it comes back very often and often, there's a kind of bell sound at the beginning that's quite striking. And the voice of the advert is quite deep too, so it makes an impression on me. Often, adverts like that make quite an impression on me."* (FR_13_M_17_monthly drinker)

Gender-related effects were also observable, with young men paying particular attention to adverts associating alcohol with a form of masculinity. Spirit or beer brands (like Jack Daniel's™, Skol™) that cultivated a masculine or epic universe were more often cited by boys, especially when linked to party atmospheres or an aesthetic of power (e.g., Viking figures). These elements were also mentioned by a few girls interviewed, who identified the targeting that boys might be subject to.

> *"I don't know, but men are always portrayed as: 'I must be strong, I must…'"* (FR_ 02_F_16_non-drinker)

> *"Well… because I think… it's because I like the world of… all that Viking stuff and all that… Nordic mythology. And so, that's what made me remember […] it's really the powerful aspect, everything Nordic and all that, it's nice."* (FR_10_M_19_monthly drinker)

> *"If you're a man and you don't drink alcohol, you're almost not a man. I think this image affects men more, because precisely, a woman who drinks too much alcohol will be less well seen. A woman who doesn't drink alcohol, we say: 'Oh, that's good, etc.' Whereas a man who doesn't drink alcohol, it's not necessarily well seen, I feel."* (FR_04_M_19_monthly drinker)

ADAM exposure: perceived effects and attitudes

Perceived level of alcohol marketing exposure via digital or other channels

As mentioned, interviewees — adults as well as adolescents — did not perceive themselves as highly exposed because they said they paid little attention to any advertisements that reached them; generally, they tended to quickly scroll past advertisements ("swipe"), alcohol-related or otherwise. Avoiding advertising was a practice quickly adopted by many internet users, a reflex quickly acquired in digital learning.

The low perceived visibility of alcohol marketing did not reflect an absence of objective exposure, but rather a deep acculturation to an environment saturated with commercial messages, in which alcohol advertising blended in with other stimuli (Courbet 2004). Several elements contributed to this form of relative invisibilisation. First, alcohol marketing coexisted with information, entertainment or peer-to-peer communication formats, making a clear distinction between commercial discourse and leisure content difficult. It could also rely on recreational content through influencers or celebrities. **This coexistence blurred boundaries and diluted the specificity of alcohol-related messages**. In particular, the frequent use of the term "advertising" to refer to preventive spots from public institutions raised questions about the clarity of the young audience regarding the broadcasters and purpose of these direct messages. At the very least, it reflected a rather general blur around the scope of the term "advertising" among young audiences. Secondly, the very nature of digital marketing – discreet, targeted, sometimes implicit – reinforced the idea that it was not "advertising" in the traditional sense of the term, and therefore that it did not deserve to be noted or remembered.

> *"I believe that, if I remember correctly, it was an advert on TV related to road accidents and alcohol consumption. So, the impact that alcohol could have on driving and it was an alcohol advert."* (FR_03_F_18_monthly drinker)

What happened on TV?

The perception of high advertising exposure via television was puzzling in a national context where this advertising medium was prohibited for alcohol, and was moreover strictly controlled and applied. If applicable, several explanatory hypotheses were explored during the interviews. After the interviewers confirmed the prohibition of alcohol television advertising, the certainty of exposure expressed by the young people concerned provided a double explanatory insight: a semantic shift in the scope of advertising leading to confusion with product placement or reference to advertising for alcohol-free beers or wines. The viewing of foreign television channels, or an event (sports competition, etc.) that took place in a country less strict on advertising rules, almost never emerged in the young people's explanations.

> "[The interviewer: But in fact, alcohol advertising is forbidden on TV] Oh really! But I've seen *some and at the end they say 'Consume with moderation', etc. Then, alcohol, I don't know, but it's like bottles of wine, bottles of other stuff, etc. Do you think it could have been alcohol-free beers or wines? (…) When it's alcohol-free, they say so and in my opinion, no, I don't think it was alcohol-free."* (FR_15_M_18_non-drinker)

In the accounts of recently remembered advertisements, it was not uncommon for confusion to emerge between commercial communications promoting an alcohol brand and alcohol prevention spots. Spontaneously, many young people used the term “advertisement” to refer to government prevention spots, although they distinguished inverse intentions to advertising promotion. Thus, they associated the term “advertisement” with any form of short video they identified as being addressed to them. **This confusion could fuel the perception of advertising targeting via television, despite a legal prohibition**.

> *“I don’t watch a lot of television, but it seems to me that it was still on TV, during the end-of-year holiday period, and it seemed to be a scene where people were trying to dissuade someone else from taking the wheel and then the advertisement said ‘everything can happen very quickly, everything can turn upside down’, and then we had a rather jovial scene with several people, etc., after which the person still took the wheel, and then we had a black screen and a prevention message.”* (FR_14_F_16_non-drinker)
>
> *“[…] for me, an advert is really about highlighting a product, (…) But it’s true that a prevention advert, in itself, has nothing commercial. (…) it says precisely: ‘Be careful of the risks.’”* (FR_03_F_18_monthly drinker)

Attitudes towards alcohol advertising exposure

Generally speaking, the young people interviewed for the study did not fundamentally question the existence of alcohol advertising, nor did they criticise the use of these commercial techniques. They considered alcohol advertising as one commercial activity among others, falling under freedom of enterprise. In their eyes, brands “had the right” to advertise, as long as it respected certain rules: not explicitly targeting minors, not being misleading, not encouraging excessive drinking. Young people accepted advertising as long as it was aimed at “responsible adults”, and not at younger people or “excessive” consumers. Also, the consideration of advertising needs in support of the legal economic sector often emerged from young people's arguments.

> *“Honestly, let them do their advertising, it’s not that we can’t do anything about it, but it has to sell, so to speak. Because we are alcohol consumers, but there should be more collective prevention: ‘beware of alcohol abuse.’ Because most people don’t listen to it. So, I’m a bit mixed. (…) It’s not necessarily good, but alcohol has to be sold, since there are people behind who have to feed their families. Advertising has to be done, but we need to pay attention to which audience is targeted and more prevention.”* (FR_02_F_16_non-drinker)
>
> *“For once, it may be more part of the culture. I think that in any case, we must try to maintain wine because France is a big producer of wines, so it’s still interesting to have advertising on that.”* (FR_19_M_19_weekly drinker)

Many argued for such a form of “controlled tolerance”, while supporting the idea of individual responsibility that tended to diminish the responsibility of the alcohol industry. The partial exoneration of alcohol producers was sometimes unconscious, as if internalised, when some implicitly assigned minors the responsibility of avoiding alcohol advertising, as in the testimony below. This expressed tolerance of commercial action was accompanied by an implicit framing of the contours of “reasonable” consumption. Thus, the acceptability of alcohol advertising rested on the projection of a market regulated by the maturity of individuals, as much — if not more — than by public rules.

> *“On the one hand, it’s normal. Advertising is part of commerce. But then, for young people, sometimes there are excesses. It’s complicated, as a minor, to avoid all alcohol advertising.”* (FR_01_M_17_monthly drinker)

The respondents said they were, at best, sceptical about the impact of alcohol advertising on their own consumption, if not affirmative about its ineffectiveness as far as they were concerned. However, regardless of age, all emphasised the persuasive effect of advertising on younger people and "addicted" individuals, who were recognised as the most vulnerable and most impressionable and as the real sources of concern. **This stance reflected the idea of an autonomous, rational, unmanipulated choice, even if they sometimes recognised that certain adverts could "make you want" or "make the product cool"**. In other words, the effect was shifted to the collective imagination rather than recognised as individual.

> *"No, not at all, honestly. Advertising isn't something that affects me or makes me want to buy it […] I'm someone who doesn't let myself be influenced, but I tell myself that for people who are easily 'manipulated', it can be very dangerous."* (FR_07_F_18_monthly drinker)
>
> *"But prevention is still very important for everyone involved. We still need to be aware of what it does. But after that, for me, what would work… I already know how to control myself. I'm aware of everything I do. If I don't want to drink, I don't drink. If I want to drink, I drink. I don't think advertising will influence my alcohol consumption."* (FR_19_M_19_weekly drinker)

This common acceptance of the advertising lever, broadly shared regardless of the level of personal consumption, testified to a form of normalisation of alcohol as an ordinary consumer product. Alcohol was presented as comparable to other consumer goods illustrative of lifestyle, such as clothing. The normalisation of alcohol and its promotion was directly supported by its strong cultural embedding in various celebratory, social and family spaces and events. **This acceptance sketched, in the background, a depoliticisation of the advertising issue as an economic health determinant**: few young people identified the regulatory issue as a subject of civic or health debate. Advertising was perceived as a structural component of the media environment, not as a political object, nor a subject of criticism. This maintained a pragmatic and non-ideological perception of marketing: as long as the message was not felt as intrusive or malicious, it was deemed acceptable.

> *"Personally, I don't have a particular problem with it. I find it normal. There's marketing for all types of products. Since alcohol is an authorised product, it's completely normal for there to be marketing around it. It's normal, for any company, I think, to try to get more. I don't have a problem with that. I find it normal."* (FR_11_M_17_weekly drinker)
>
> *"No, it doesn't necessarily bother me. It's just like any other ad. If, for example, I have a friend who's looking at an ad for football boots because he'd like to buy them, OK why not. If the other person wants to buy that kind of alcohol, OK why not. It doesn't affect me personally, so I don't really care."* (FR_20_M_16_non-drinker)

Perceived impact of advertising and the channels with the greatest impact

Young people highlighted the presence of alcohol-related content on social networks, particularly Instagram®, Snapchat®, TikTok® and, to a lesser extent, YouTube®. Content from people perceived as "close" was considered more persuasive than messages of institutional, commercial (from brands) or anonymous origin. These "close" interlocutors were described as friends and family, but it was interesting to note that this designation also referred to small or medium-audience influencers, or even certain music or sports figures. In other words, social and cultural identification reinforced message reception and the desire for imitation. In light of the accounts, the effectiveness of exposure would lie in the message format: the short duration of content (stories, reels, memes) and their integration into the flow of targeted content consumed at will during navigation. Sensory (catchy music, dynamic visual effects) or emotional (humour, nostalgia, festive staging) impact was also invoked in the testimonies.

> *"(…) it was an internet meme, which is starting to get a bit old. It was a very short video of someone being interviewed by a newspaper at a party who cited a few alcohol brands. In fact,*

> *what made it a meme was that the way he said it was funny. But deep down, it's not so much the alcohol that makes it interesting. It was the person's pronunciation and manner of speaking in the video."* (FR_01_M_17_monthly drinker)

A young girl (interviewee FR-03) also indirectly referred to the Fear of Missing Out (FOMO), the fear of missing out on a valued social experience, which played an implicit role in the normalisation of alcohol consumption among young people. This feeling was intensified by social networks, where parties, festive gatherings and moments with friends were constantly staged. In this context, parties were not only spaces for consumption, but also symbolic places of inclusion. Not attending, or not sharing the same practices, could be experienced as exclusion or a loss of social opportunity. These feelings applied to parties organised by peers, as well as those orchestrated by influencers.

> *"And I think on TikTok®, it has already happened. I have an image of a party or evening where alcohol is consumed. And there, it's necessarily a super positive communication because there are lots of people, they are with friends, it makes you want to be there."* (FR_03_F_18_monthly drinker)
>
> *"It was more the atmosphere, it was clearly a party. In fact, her birthday was held in several parts, so I saw alcohol several times, but there was the part in a large Haussmann apartment. Yes, that's also what caught my eye, the apartment was very large and we had a small table, but it wasn't a low table, it was a high table and we had buckets with ice filled to the brim, bottles, beers next to it, well, it was still very organised, but there was a lot of alcohol."* (FR_03_F_18_monthly drinker)

Experiences and attitudes towards different types of advertising

Content that was too explicit, prescriptive or didactic (including prevention messages) was rarely appreciated or memorised, as it broke with the codes of authenticity and fluidity expected in the digital environment. Advertising clearly identified as originating from brands on digital channels was generally perceived as intrusive and disruptive, including from known or appreciated brands, with alcohol brands being no exception. **This generalised rejection of advertising contributed to young people's perception that they were not affected by its content**. These reactions suggested that the concealment of the advertising message in a playful or aesthetic universe increased its impact, even without a declared intention to influence. Advertising in physical spaces was not specifically designated by young people as an effective advertising vector. Nevertheless, outdoor advertising in public spaces was among the main advertising channels that young respondents remembered.

Another lever, though less explicitly recognised by young people, lay in the significant place of alcohol in the media universes they consumed: music videos, series, films, streaming platforms. Via digital channels, these product placements exploited the image and influence of celebrities and mobilised various representations or norms associated with alcohol, cultivating the brand's universe. Certain associations that would be prohibited in an advertisement found a legal showcase in product placement. These representations had an even stronger normative effect because they were not perceived as prescriptive, but as reflections of daily life. Cinema and series did not directly encourage drinking, but they helped to anchor alcohol in social imaginations as an ingredient of success, maturity, or integration.

> *"Films and series, when they highlight… scenes with alcohol, it looks very fun and all that, so maybe yes, it can influence people. They seem to be having a good time and… And it's true that when… you drink, you can have a good time."* (FR_08_F_18_monthly drinker)
>
> *"An advert with a star… often a Hollywood star, an American star drinking a beer, often a handsome man, shirtless on the beach drinking his beer. It's really the cliché, but that's the idea. There you go, it's often men, actually. I'm realising that often, in adverts, it's more men who drink alcohol when it's beers, even generally, I think. My opinion might be biased, but yes, perhaps in relation to virility, that it's something virile to drink alcohol."* (FR_04_M_19_monthly drinker)

Knowledge and attitudes towards alcohol regulation

Acceptability of alcohol marketing regulation and alcohol control policies

The young people interviewed as part of the study had a fragmented knowledge of alcohol regulation, even if they identified a few emblematic prohibitions, such as the ban on sales to minors or drunk driving. These elements seemed to derive more from an internalized moral register than from precise legal knowledge.

> *"I think it's normal. For example, I don't see my little brother going to the supermarket to ask for alcohol. I don't think that's normal."* (FR_12_F_17_non-drinker)
>
> *"Oh no, if you're driving, you don't drink, well if you're driving, you don't drink."* (FR_15_M_18_non-drinker)

French regulations specifically governing alcohol advertising, particularly on the Internet, were largely unknown or misunderstood by the young interviewees, regardless of age, both in terms of prohibited channels and subjects and in terms of the legal protection that those under 18 were supposed to benefit from. The lack of knowledge of this prohibition of advertising targeting minors might stem from a feeling of incoherence or even incongruity with regard to such a restriction, given the density and ubiquity of alcohol advertising observed in public space. For minors as well as young adults, the understanding of the legality of alcohol advertising was deduced from their digital experiences and their memory of prior exposure.

> "Television, I don't know at all. But social networks and the internet, in my opinion, there aren't any or they are too weak. Because I suspect there must be people who get even more advertising than me. From what I see, an advert can reappear even if you've already watched it. So in my opinion, there are no regulations regarding the audience receiving the advertising and the number of times they receive it, I don't think there are any." (FR_03_F_18_monthly drinker)

Despite this lack of knowledge, young people expressed overall support for regulatory principles, particularly when it came to protecting minors or preventing risky behaviours. Public authorities' intervention on these preventive and public health considerations was unanimously recognised as legitimate. However, this apparent consensus clashed with a finding of inefficiency or contradiction in its application. Furthermore, this acceptance of public action and the legislator co-existed with advocacy in favour of a more individualised moral framework of responsibility.

> *"So encouraging us, at 16 or 17, to buy alcohol, even really, 18 or 20, for me, it's not especially a good idea."* (FR_14_F_16_non-drinker)
>
> *"Afterwards, it's also everyone's responsibility. If people manage to get hold of it, it's because they've made a certain effort. At some point, we are also responsible for what we do."* (FR_13_M_17_monthly drinker)

Perceived effectiveness of regulations

The perceived discrepancy by young people between the stated intentions of the law and its concrete implementation was particularly salient on two levels: sales control (see "accessibility of alcohol" section) and online advertising. Applications like Instagram®, Snapchat®, and TikTok® were perceived as largely unregulated spaces. Many respondents believed that if the rule did not apply in the spaces where young people spent most of their time, it lost its substance.

> *"I have no knowledge of it, it's really what I personally think about what should be done and what I also see. It's possible there are regulations, I don't know. But from what I see, it comes back very often for the regulations to be well applied or to be effective."* (FR_03_F_18_monthly drinker)
>
> *"Well, in principle, I would find it good, but in practice, I don't think it has much effect, actually. Because as we said, there are many advertising channels. In fact, it's never checked whether a minor sees the advert. Well, it's part of that kind of law… OK, this law exists, but when is it actually applied? When?"* (FR_04_M_19_monthly drinker)

The criticisms pointed to a form of inconsistency in advertising restrictions, both in substance and form. They stated the impossibility of protecting minors from omnipresent advertising calls that imposed themselves on everyone in public spaces. They rejected the very feasibility of a differentiated advertising approach towards minors. **Without explicitly mentioning it, the criticisms nevertheless suggested that a total ban on alcohol advertising was the only effective solution for protecting minors and the most vulnerable**.

> *"Finally, it's a bit silly, actually. Because ultimately, all means of advertising alcohol or… I don't know, even TV, when it was legal, radio, billboards, train stations, influencers, etc., at no point, when you go to a train station, are you asked: 'Are you 18?' to look at the billboard. So yes, in fact, it's…in fact, I don't even see many cases where you can advertise to a minor, knowing they are a minor. (…) Because in fact, yeah, all advertising means are means that are in the street, where you can't check the person's age afterwards. And even online, I mean… What also happens is that when you go online, often, for your account, you always put your age a little bit higher. Well, that's what I did when I created my Gmail account, my Google account. So when I was 14, I put 18, and so that's what almost everyone does, because otherwise, you have a lot of hassle creating accounts on lots of sites. So when you're young, generally, you do that. So, you end up with alcohol suggestions, indeed, which can happen on certain sites, I don't know, when you go on Amazon, there you go, because the algorithm thinks you're an adult."* (FR_04_M_19_monthly drinker)
>
> *"At the same time, in an advert, it's difficult to communicate in a different way for young people than for older adults. Because in the end, the advert will be the same, no matter how it's said, the advert will remain for their products and for alcohol."* (FR_05_F_19_monthly drinker)

In terms of advertising control, the failure to apply restrictions was particularly emphasised regarding social media. In the interviewed group, these shortcomings were not always attributable to circumvention practices implemented by young people (lying about their minority), nor to a proactive search on their part for an alcohol brand and associated content. In this case, the content pointed out by young people more often referred to promotional content published by influencers, event establishments or companies, or even content generated by ordinary internet users, rather than advertisements directly disseminated by the alcohol industry.

> *"On social media, you really see anything and everything, so I don't think it [the regulation] is really respected. If you follow content about parties, things like that, people who drink a lot of alcohol, who go to a lot of parties and who go to a lot of nightclubs, you're bound to see things that highlight products related to that. And whether you're an adult or not, you can access it and you can lie about your age."* (FR_21_F_17_monthly drinker)
>
> *"Because on social networks, I'm sure I've already seen some before I was an adult. And I'm sure of that. Because there are examples that I recall that I haven't seen recently, and I've been an adult since July this summer. I know very well that I saw some before July, for that matter. (…) Yes. In addition, I correctly filled in my ages on the accounts in question. So no, for that matter, I'm sure I received some before."* (FR_03_F_18_monthly drinker)

Suggestions to improve alcohol prevention

Despite their scepticism about the real effects of current regulations, the young people interviewed were not hostile to the idea of strengthening certain forms of prevention. A first area for improvement mentioned by young people concerned the prohibition for influencers to talk about alcohol without transparency on the commercial intentionality or without clear warning. Others proposed limiting the accessibility of alcohol-related content via stricter filter systems or better moderation.

> *"Again, the small banner 'beware of alcohol abuse' is really not enough […] At least, they should say it's an ad. You never know if it's just a story or something."* (FR_02_F_16_non-drinker)
>
> *"And then, actually, I think it would be good if it were quite strict or if it were more precise."* (FR_04_M_19_monthly drinker)

A third area mentioned concerned prevention. School interventions were reported by respondents as one-off sessions, provided by law enforcement representatives, teachers as part of courses, or external speakers. These arrangements were often experienced as a neglected school interlude, illustrating the gap between preventive intent and its actual reception.

> *"From what I've seen, not only do we not have much prevention, I think I had two in middle school and one in high school, related to that, I find that very little, over seven years of middle and high school. It's far too little. But in addition, often, we're young, there are speakers, it's funny, we don't have classes. Often, it replaces a class, we're happy. And in the end, we don't really pay attention to the message. From what I can see, in any case, and even myself, from what I've already experienced, we don't pay attention at the moment. Even though, however, it's very important."* (FR_03_F_18_monthly drinker)

Some young people seemed to argue that top-down prevention failed to capture attention or elicit active engagement. Several young people suggested anchoring prevention messages in their daily media universes (social networks, short formats, personal narratives) and favouring forms of horizontal dialogue or peer-to-peer transmission. In other words, effectiveness depended less on institutional repetition than on the ability to integrate the codes, temporalities, and modes of appropriation specific to adolescent socialisation.

Finally, regarding the content of preventive messages, several suggestions leaned towards a more pronounced use of shock messages, perceived as a lever for raising awareness, among young alcohol consumers or non-consumers. Addressing risks and informing about laws were also mentioned themes, albeit more sparsely.

> *"Personally, when I see them, I receive them well in the sense that the advertisement will mark me and it will put me off alcohol for a little while. Then, I gave you the example of the car accident I saw in an advertisement on TV to prevent risks. It struck me because advertisements are getting better and better, necessarily, they are more shocking. And when it shocks, you think, you say to yourself: 'Yes, it's true, there are still enormous risks in consuming too much or taking the wheel after consuming.'"* (FR_03_F_18_monthly drinker)
>
> *"Because I think it hasn't been long since they started making really shocking adverts. It's quite recent. And I find that even if it's very shocking sometimes – it shocks me – I think it's good. Because then, it reinforces my idea that drinking alcohol is nonsense."* (FR_14_F_16_non-drinker)
>
> *"Afterwards, if you want to drink, you drink, if there are damages, there are damages, but maybe inform us more. Especially about the laws. I think that at school, it could be necessary to talk about it. Sometimes, there are speakers who come. It could be interesting. Even if I don't drink, I*

> *think it's super interesting. Like the blood alcohol content that remains, etc. Things like that."* (FR_14_F_16_non-drinker)

Attitudes towards drinking and main drivers of drinking

Personal attitudes to alcohol and perceived risks

For a majority of young people interviewed, including minors, alcohol consumption was not transgressive and was part of social gatherings. The accounts testified to occasional use, often limited to evenings, birthdays, celebrations or holidays. For these young people, use was rarely described as a solitary practice and was rarely associated with a situation of suffering. **The main driver was not alcohol itself but the atmosphere that accompanied its consumption (which motivated it or that it created): relaxation, letting go, laughter, pleasure and the camaraderie of sharing**. Alcohol supported the festive experience, strengthened bonds, and triggered new situations. From this perspective, taste acted as an initial filter that sugary drinks, light cocktails, well-known brands (Desperados, Smirnoff Ice) allowed to overcome without rejection (Obradovic 2017, Douchet and Neybourger 2022). Young people, especially older ones, maintained that the choice to consume one alcohol over another was a matter of taste, forged by the acquisition of a certain experience, rather than a motivation induced by advertising.

These attitudes affected the perception of risks. Long-term health risks associated with alcohol (cancer, cirrhosis, neurological damage, etc.) were largely absent from the discourse of the young people interviewed. Minds were mainly focused on more immediate, internal and external risks, certainly the risk of accidents, injuries, alcohol poisoning or acts of violence, but also internal and external social risks (Gaussot and Palierne 2020). For this young public, at a time of developing youth socialisation, internal social risks, the fear of ostracism, were the most pressing, as they referred to social image: losing face, making a fool of oneself, damaging one's image. Among the interviewed young people, mainly non-drinkers or occasional drinkers (monthly), internal risks (loss of control, blackout) were often linked to situations observed in others. Aware of the risks associated with alcohol "behind the wheel", the young people interviewed had notably well integrated the preventive figure of the "Sam" (designated driver) and key road safety arguments: loss of control, altered reaction time and potential collective consequences of individual behaviour. External risks (violence, aggression) were mentioned especially by girls.

> *"A friend got groped in a club, she'd had two drinks. She didn't remember anything"* (FR_14_F_16_non-drinker)

Faced with these risks, they established specific control strategies, consisting of upfront selection of usage contexts, favouring parties where, in the "protective self-contained group" (Le Hénaff, 2020), they would feel more at ease and confident to consume. This security logic often translated into the definition of essential conditions for alcohol consumption and the choice of parties confined to closest peers, in private homes, in public spaces accompanied by boys, girls' nights out, etc..

> "*Precisely… for me, whenever I drink, it's when I feel safe, so, it's when I know I'm going to sleep at the person's house, it's when I know that… I can… well, I've never vomited, but I know I can vomit nearby if I need to. In short, I know everything will be fine. But when there are returns… like, well… going home alone at night, no, I don't consume, I don't wear heels, I wear… tracksuits."* (FR_08_F_18_monthly drinker)

Role of peers and social environment

Peers played a crucial role, not only in initiating alcohol consumption, but also in defining consumption norms. Regarding consumption norms, the interviews illustrated the importance of the group in the

collective construction of implicit rules: when to drink, how much, in what context, with whom. It validated, moderated or, conversely, pushed to excess.

> *"The most likely to influence my alcohol consumption will be the group. It's when I'm at a party, everyone's drinking a bit, I'll do it too. Because there'll be an atmosphere where we'll all be a bit more sociable, there might be a bit more cohesion in the group. So, I'll consume on those occasions."* (FR_13_M_17_monthly drinker)

When asked about the reasons why they would try an alcohol, young people tended to be rather "conservative" in their choices. They tended to consume products whose taste they already knew, which they had already experienced, including alcohol. Friends and peers were also presented as the main people likely to make them opt for something new, by letting them taste it. In this scenario, advertising was rarely recognised by young people as a decisive factor.

> *"I think it's* really based on what I've already tried. For once, I don't buy things just to have novelty. When I buy something, it's just because I know what it's worth, let's say. I know I appreciate it or I've already tasted it and I like it, or friends appreciate it too so I'll buy it to bring. But otherwise there are no other factors." (FR_03_F_18_monthly drinker)
>
> *"There are: one, I think the fact of knowing it and already knowing what flavour it has, and so knowing that I'll be able to drink it or it will make me happy to drink it. Two, if I've either seen an advert or someone told me 'yes, I tasted that, and it was good', etc., maybe that could make me want to buy it to taste it myself. But yes, I think it must be more like: people telling me 'oh yes, I saw that too and I tried it' and so I try it too."* (FR_05_F_19_monthly drinker)

Following the results of the ARAMIS 2 survey (Douchet and Neybourger 2022), the line between "getting tipsy" (enjoying the positive effects of alcohol) and "getting trashed" (vomiting and having a hangover) was often thin, even blurred. The interviews showed a reconstruction of festive memories, particularly through social networks. Episodes of collective drunkenness thus contributed to building a shared memory that acted as a psychosocial cement for the group beyond the evening.

> *"In fact, alcohol puts you in a certain state where afterwards, there are things you don't experience the same way thanks to or because of alcohol, let's say. In fact, it brings you a new life experience, let's say, for a certain time, for the time you're drunk, and some people find that cool."* (FR_05_F_19_monthly drinker)

Not drinking or participating in drinking games also increased the risk of being assimilated (or identifying oneself) as boring or not knowing how to have fun. Refusal to consume was often linked to personal preferences — religious, a dislike of the taste, or painful family experiences — but could lead to repeated justification, especially in groups where alcohol was the yardstick for "real parties". At the same time, many young people — whether alcohol consumers or not — reported a peaceful coexistence between drinkers and non-drinkers at parties, free from group pressure.

> *"Well, when I was younger, I think it could have made me wonder, made me say: 'Maybe I'm the one who's too uptight, actually'"* (FR_04_M_19_monthly drinker)
>
> *"I have some friends who know it's a bad thing, but who can't do without it during a party, because otherwise, they say it's not a party if there's no alcohol."* (FR_16_F_17_non-drinker)
>
> *"Some of my friends don't drink for religious reasons or because they just don't want to or… that's it. But… if we're at a party, all together, it doesn't bother them if… some of us drink or don't drink. Some don't drink, who just don't like it, others for cultural reasons. But… there are some who… appreciate it and… but who know their limits, so… We've never really opposed alcohol at our parties because we've never had a big slip-up, since we always… Well… we didn't do anything*

> *crazy. We just played games, danced a bit and then… everyone had a good time. There were no… no problems."* (FR_08_F_18_monthly drinker)

Role of family and cultural traditions

The family remained the primary circle for initiation into, or abstention from, alcohol consumption. In the discourse of the young people interviewed, the family appeared less as a barrier against alcohol than as one of its vectors for supervised learning and implicit legitimation, particularly through the early and normalised introduction of certain products (wine or champagne). Wine held a particular place in reported parental discourse: it was perceived as a cultural product, distinct from other alcoholic beverages, often described as being "for young people" or "for partying". This distinction valorised certain types of consumption while disqualifying others, constructing a moral hierarchy between products.

> *"Because my parents, on weekends, they offer me some from time to time, I accept […] For example, my parents, if they offer me a glass of… I like Pastis, for example. I know it's peculiar for my age, but I like Pastis. I like wine, whether white or red, but often, it's more when I'm with my parents."* (FR_04_M_19_monthly drinker)
>
> *"Yes, yes. Well… wine and all that, sometimes, I tasted it. And then, I remember, I think there was a Christmas where I finished the wine glasses, but… meh! In fact, I don't even like it so…"* (FR_08_F_18_monthly drinker)

Even when advocating moderation, parents frequently contributed to the construction of a "reasoned" and "civilised" relationship with alcohol. Young people's self-control of alcohol consumption stemmed from parents' ability to establish conditions for free will and the trust placed in their children to make reasoned choices. **This type of transmission was based on an ethic of self-mastery, which distinguished good use (social, measured, adult) from bad use (excessive, festive, youthful)**. However, this boundary was more symbolic than functional: it implicitly validated alcohol as a marker of maturity and inclusion, while shifting regulation towards the individual.

> *"Afterwards, my parents drink alcohol, and so do I. It's just about knowing how to drink in moderation. But yes, for anything like a birthday, any party, there's alcohol. Then you just have to know how to consume it well."* (FR_05_F_19_monthly drinker)
>
> *"There's a small aspect, it's the same way and at the same time, it's not entirely the same. With friends, I think it will be much more liberated. In the sense that we won't look precisely at who consumes what. Whereas in family, I find there are codes, we pay more attention. Maybe we won't drink as much as at a party with friends. We won't drink the same types of alcohol either and we don't have the same effects. In family, we'll laugh at the table, it's warm. But we won't necessarily try to dance, we'll drink less in family than with friends. That's especially the difference too."* (FR_03_F_18_monthly drinker)

The way families framed or tolerated alcohol consumption varied according to social and cultural backgrounds. In middle or upper-class families, like those of the young people interviewed, the introduction to alcohol was more often framed, ritualised and accompanied by discourse on moderation, but also on tradition. In their accounts, young people unanimously mentioned the role of culture in consumption patterns.

> *"For once, it may be more part of the culture. I think that in any case, we must try to maintain wine because France is a big producer of wines, so it's still interesting to have advertising on that."* (FR_19_M_19_weekly drinker)

> *"Whatever we say, alcohol is still a big part of the culture, especially French culture. For me, it seems important to share this experience, which many people share."* (FR_01_M_17_monthly drinker)

This variability confirmed that the family acted as a prescriber, moral filter, and learning environment. It also showed that young people sometimes had to deal with several contradictory injunctions: a family discourse of moderation, a festive social norm conveyed by peers, and a valorising advertising exposure.

Accessibility of alcohol

Respondents extensively discussed the ease with which they could procure alcohol. Many, including minors, were offered alcohol by family; however, direct purchase remained quite widespread. For minors, despite the sales ban, the lack of control in accessing alcoholic beverages was systematically mentioned. ID cards and age were rarely requested by sellers. The latter might even "turn a blind eye", as several young people testified, all of whom were minors at the time of the reported purchases.

> *"When I was a minor, I still managed to buy alcohol even though it was illegal, you know! Well… After… I don't know. Yes, I think there should be laws, but there already are. You just have to… go to the right mini-markets and… that's it."* (FR_08_F_18_monthly drinker)
>
> *"…we knew where we were forbidden, we knew where we weren't forbidden, and… and… we… we went, you know. We went, we bought and we knew that… Even more… now… then, it's not necessarily good, but… but… for example, with Snapchat and all that, you can modify whatever you want, everything… everything that is… so to speak, ID card, it just lacks a photo."* (FR_09_M_18_monthly drinker)
>
> *"As I've always been tall for my age, I'm 1.87 metres, so at 17, 1.87 metres with a bit of a beard and all that, well… necessarily when you go to the supermarket, people will more easily… well, they'll say: 'Well, he's an adult. It'll pass.'".* (FR_10_M_19_monthly drinker)

Minors had very well identified the situations most likely to result in refusal: buying spirits rather than beers, the age of cashiers (refusal of sale being more frequent with sellers perceived as older), as well as group or pair purchases rather than alone. They developed numerous circumvention mechanisms, such as borrowing ID cards from older peers or intercession by peers who appeared older (those who "have beards", who are "taller and more imposing"). They could also resort to self-checkout machines to avoid contact with staff or conceal bottles among other products (food, etc.).

Concluding on the qualitative analysis

Ultimately, the interviews conducted as part of the CIPPAL-ADAM survey showed the full ambivalence of young people's relationship with advertising, where the strength of environments saturated with alcohol-favourable signs produced behavioural norms of avoidance without issuing commands, simply through cumulative exposure.

Firstly, alcohol advertising was perceived as having little influence on personal behaviours, but potentially problematic for other "manipulable" individuals – especially younger people or consumers suffering from addiction. This discrepancy between the protected "self" and an influenceable "other" illustrated a kind of personal immunity that literature referred to as a "third person effect" (Perloff 1989), an external attribution bias that consisted of minimising one's own degree of influence while attributing the effect to others. In other words, a mechanism of cognitive dissonance allowed one to preserve the self-image as an autonomous subject. However, integrated formats, content generated by peers or micro-influencers on social networks, if not identified as "advertising", exerted a very real influence on consumption norms –

through mimicry, identification or the desire for inclusion. The narratives showed a masculine differentiation in the reception of advertisements, echoing other studies, highlighting young men's preference for products whose advertising asserted a stance of mastery or performance within the group and encouraging active engagement with the content (liking, commenting, sharing, etc.) (Gatinet and Gallopel-Morvan 2021). They also illustrated the persistence of gender stereotypes despite the convergence of alcohol consumption behaviours between girls and boys observed in recent years, similar to previous studies ((OFDT 2023), (Douchet and Neybourger 2022, Selponi 2024). The digital space in which young people evolved was saturated with commercial stimuli. The avoidance techniques developed towards explicit forms of advertising demonstrated a "critical competence" (Pasquier 2015) reinforced by their daily use of social platforms. Young people identified commercial signals, learned to circumvent them, and thus reaffirmed a symbolic autonomy. **But this autonomy remained ambivalent: while explicit messages could be discarded, implicit, integrated, or algorithmic marketing shaped their exposure experience invisibly, more easily escaping subjective control**. Indeed, algorithmic, fluid, and contextual exposure to alcohol-related content escaped conscious vigilance, while contributing to an implicit normalisation of consumption. In this ecosystem, the boundaries between commercial, cultural, and relational communication became porous, diluting the power of public regulation.

Despite the prevalence of digital spaces in young people's daily lives and socialisation modes, respondents referred more to advertisements in public spaces when recalling a recent advertisement. These displays imposed themselves on their view without possibility of evasion while they frequented the space; however, these components integrated into the ordinary physical environment of young people (street, public transport, shops, etc.) raised fewer criticisms regarding their intrusive nature than online advertisements.

The discourse of young people showed that alcohol use was anything but an abstract individual decision: its consumption was deeply embedded in social and relational structures. The family circle, peers, series, or music videos shaped imaginaries in which alcohol was a vector of sociality, a youthful rite of inclusion, a marker of maturity. Taste or advertising would play only a secondary role here, reinforcing already established habits. The implicit rules around what was acceptable or not to drink, in what circumstances, and with whom, were largely negotiated within the peer group through the prism of internalised gender norms. Other studies highlighted that the rules of "good drinking" varied differently according to gender, age, and social background (Obradovic 2017, Douchet and Neybourger 2022). Even if peer pressure to drink alcohol was still reported, many young people also reported greater tolerance towards those who did not drink, without particular exhortation from drinking peers.

Young respondents expressed a discourse of individual or family responsibility, typical of their middle and upper social classes, as highlighted by the analyses of Bourdieu (Bourdieu 1979) and Lahire (Lahire 2019) on differentiated forms of socialisation to norms. They valued a logic of self-control, referring regulation to the domestic or moral sphere rather than to the state. However, they did not fully disqualify the action of the state as a mirror of this civil responsibility, insofar as they advocated for reinforced state protection, due to the failing application of current preventive measures. Other studies showed that the valorisation of self-regulation, by which everyone was summoned to be their own regulator without possessing the same resources, also reinforced inequalities: the least socially supervised young people were also those for whom this logic of responsibility weighed most heavily (Lahire 2019).

Fourthly, young people expressed principled support for alcohol regulation, especially when it came to protecting younger people or limiting visible dangers (road accidents, assaults, etc.). However, this adherence clashed with a weak knowledge of existing rules and a distrust of their effectiveness, particularly regarding online advertising. Sales and advertising control were judged partly inoperative, with many young people reporting experiences in this area, lived or reported; these shortcomings, generally associated with the actions of sellers or buyers, however tended to weaken the credibility of public intervention. A significant proportion of young people – predominantly from middle or upper classes

– valued individual or family responsibility, considered more effective than state regulation whose application was perceived as failing. **This individualised framing of behaviours, while seemingly rational, tended to invisibilise inequalities in health literacy, access to information, prevention resources, or a form of protective social capital**.

Young people used the term “advertising” to indiscriminately qualify different types of audiovisual communications, including prevention spots which were contrary to a promotional intention. This semantic confusion suggested the introduction of a potential bias in any questioning using the term “advertising” and called for vigilance in epidemiological and sociological surveys on this topic.

Finally, this survey offered a valuable analytical framework on the scope of public alcohol consumption prevention policies, based on regulation. It reminded us that the most powerful levers of influence in the eyes of young people insinuated themselves into digital socialisation, experiential narratives, and ordinary cultural practices. The control of the advertising lever for alcohol suffered from the inconsistency of its scope of application, which allowed for numerous promotional opportunities, both in physical and digital spaces, in contrast to the primary principle of protecting minors.

EXPOSURE TO ADAM

The CIPPAL-ADAM study design included a web survey that targeted young people aged between 15 and 21 in order to estimate the Youth's exposure to alcohol marketing across a range of media and contexts, especially audiovisual and digital media, such as TV and Internet and social networks (ISN). Given the vague outlines of the concept of advertising observed during the interviews, the online survey focused on the issue of positive portrayals of alcohol in addition to advertising. Questioning also entailed diverse mediators likely to influence the perception of exposure to alcohol marketing, like the demographics, drinking status, acceptation of alcohol control policies and general incentives to drink. Drinkers were defined as respondents who claimed having consumed alcohol at least once in the last 12 months at the moment of the survey. For analysis purposes, an index on "Internet and social media use profile" (referred as ISN use profile) was constructed based on three criteria: web use frequency, active/passive web use and ISN use control. These criteria were derived from direct questions included in the survey.

The French sample included 1 024 respondents aged 15 to 21 and data were weighted to meet representativity with regard to age, sex, economical status (see chapter Methodology). In this sample, males are surprisingly less likely to be alcohol drinkers than females (OR=0.78). We can hypothesize that boys are less likely to respond to an online survey of this type on the subject of alcohol advertising. The main results for the French sample are discussed in this chapter.

Digital and TV exposure to positive portrayal of alcohol

The survey reveals widespread exposure to positive portrayals of alcohol (Table 3). Overall, 75% of the total country sample reported seeing alcohol portrayed positively on any media in the last 30 days. Online exposure, reaching 63%, was more common than on TV or at the cinema (56%).

Age is a significant factor. Those aged **more than 18** showed a significantly higher exposure on any media (78%) compared to those **under 18** (65%, χ^2=19.31, p<0.001). This trend holds true for online exposure (69% for 18 and over 18 vs 48% for under 18, χ^2=40.62, p<0.001) and TV/cinema exposure (60% for over 18 vs 49% for under 18, χ^2=9.79, p<0.001).

Heavy to intensive ISN users exhibited significantly greater exposure on any media (79%) than low to moderate users (72%, χ^2=6.79, p<0.001). This difference was also significant for online exposure (69% vs. 58%, χ^2=12,99, p<0.001) and, to a lesser extent, for TV/cinema exposure (60% vs. 54%, χ^2=4.24, p<0.05).

Males reported significantly higher exposure on any media compared to **females** (78% vs 71%, χ^2=6.82, p<0.01)). The gap is even higher in boys regarding exposure on TV or at cinema (62% vs 52%, χ^2=10.76, p<0.001). However, the drinking status had the least impact on exposure rates. Overall, drinkers had a higher exposure rate on any media (76%) than non-drinkers (73%), but differences, regardless of the medium, were not statistically significant.

The **superior declared economic category** had a significantly higher exposure rate (79%) on any media compared to the lower to intermediate category (72%, χ^2=6.87, p<0.001). This difference is mainly driven by audiovisual overexposure on TV or at cinema among the upper classes (63% vs 52%, χ^2=12.09, p<0.001).

Young people who **fully or somewhat disagreed with the ban on advertising to minors** (including those who were unsure about the issue) reported being exposed to positive portrayals of alcohol significantly more frequently across all media than those who agreed with the ban (77% vs 74%, χ^2=10.94,

p<0.001). This tendency is even more pronounced when it comes to online exposure (70% vs 60%, χ^2=22.10, p<0.001).

Table 3. Effective exposure to positive portrayal in France (N=1 024)

Have seen a positive portray of alcohol, in the last 30 days		Online			On TV or at cinema			On any media		
		n	%total	%cat.	N	%total	%cat.	n	%total	%cat.
In the whole country sample		641	63%	63%	578	56%	56%	763	75%	75%
Age	Under 18	145	14%	48%***	149	15%	49%**	198	19%	65%***
	More than 18	496	48%	69%***	429	42%	60%**	565	55%	78%***
Gender	Male	318	31%	64%	310	30%	62%**	393	38%	78%**
	Female	312	31%	62%	262	26%	52%**	360	35%	71%**
	Non-binary	2	0%	27%	0	0%	5%	2	0%	27%
	Other	8	1%	86%	6	1%	60%	8	1%	86%
Drinking status	Drinkers	395	39%	64%	341	33%	55%	469	46%	76%
	Non drinkers	246	24%	61%	237	23%	59%	295	29%	73%
Declared economic category	Superior	265	26%	66%	253	25%	63%***	316	31%	79%**
	Lower to intermediate	376	37%	60%	325	32%	52%***	447	44%	72%**
Knowledge of the ban to advertise alcohol to minors	Yes	247	24%	59%	225	22%	54%	302	29%	72%
	No	394	38%	65%	353	34%	58%	461	45%	76%
Acceptance of ban on advertising to minors	Fully or somewhat agree	476	47%	60%***	443	43%	56%	584	57%	74%***
	Fully or somewhat disagree or don't know	165	16%	70%***	135	13%	58%	179	18%	77%***
Internet or social network (ISN) use	Heavy to intensive use	284	28%	69%***	247	24%	60%*	323	32%	79%**
	Low to moderate use	357	35%	58%***	331	32%	54%*	440	43%	72%**

Note to the reader: Young people under 18 who have seen a positive portray of alcohol, in the last 30 days, on any media are 19% (n=198) of the total sample. They are 65% of all young people under 18 (i.e., their age category) and the difference with the 18 and over is statistically significant at 1‰.
Statistically significant difference at the 5% (*), 1% (**), 1‰ (***) level (χ^2 test).

Ultimately, respondents who did not know about the ban to advertise alcohol to minors had a slightly higher exposure (76%) on any media compared to those who did know (72%), though this difference was not statistically significant across all media types.

Vectors of online of exposure to positive portrayal

Table 4 details the specific digital channels through which positive alcohol portrayals are seen by young people in France. It shows that the most common channels were **influencers' posts (22%)** and **posts created by alcohol brands (21%)**. Posts created by a friend or ordinary person, and by an association or event organiser, accounted for 15% and 8% of exposure, respectively.

Young adults aged 18-21 and **the heavy to intensive ISN users** consistently show higher percentages of exposure to positive alcohol portrayals across most digital channels compared to their counterparts.

Table 4. Digital contents conveying positive alcohol portray in France (N=1 024)

Digital channels of positive portrayal of alcohol	In the whole country sample		Under 18		More than 18		Heavy to intensive ISN user		Moderate to low ISN user	
	n	%total	n	%cat.	n	%cat.	N	%cat.	n	%cat.
In an influencer's post	225	22%	49	16%	176	24%	105	26%	120	20%
In a celebrity's post	144	14%	21	7%	123	17%	66	16%	77	13%
In a post created by a friend or an ordinary person	152	15%	28	9%	124	17%	73	18%	79	13%
In a post created by an association, an event organiser	82	8%	11	4%	70	10%	50	12%	32	5%
In a post created by an alcohol brand	214	21%	39	13%	175	24%	97	24%	117	19%
In other kinds of posts	63	6%	14	5%	49	7%	31	8%	32	5%
I'm not sure/ I don't remember	34	3%	10	3%	24	3%	13	3%	21	3%

Note to the reader: 22% of the whole sample of young people saw positive portrayals of alcohol in an influencer's post. This figure is 164% for young people under 18 versus 24% for the 18 and over, and 26% for heavy to intensive ISN users versus 20% for moderate to low ISN users.

Vectors of TV exposure to positive portrayal

With regard to audiovisual channels broadcasting representations that promote alcohol (Table 5), **movies and television series** are the most common (21%), followed by commercials (18%) and music videos clips (13%). The **older age group** (18 and over) generally reported higher exposure rates across most TV content types, including movies or series episodes (22% vs 19% for under 18) and another TV show (10% vs 4% for under 18). Interestingly, **prevention campaigns** also showed higher percentages for those over 18 (15% vs 9% for minors).

Movies or series episodes (21%) are the primary vector for positive alcohol portrayal for both age groups. In addition, the **"More than 18" group has consistently higher reported numbers** of exposure across almost all TV content types compared to minors. Table 5 shows that **heavy to intensive ISN users generally report higher numbers** for most TV content types conveying positive alcohol portrayals, with "In a movie or a series episode" being the most frequently cited by both groups.

Table 5. TV contents conveying alcohol positive portray in France (N=1 024)

TV channels of positive portrayal of alcohol	In the whole country sample		Under 18		More than 18		Heavy to intensive ISN user		Moderate to low ISN user	
	n	%total	n	%cat.	n	%cat.	n	%cat.	n	%cat.
In advertising spots/commercials	185	18%	52	17%	133	19%	77	19%	109	18%
In a prevention campaign warning of the risks of alcohol use	133	13%	28	9%	105	15%	65	16%	67	11%
In a documentary report	57	6%	12	4%	44	6%	29	7%	28	5%
In a movie or a series episode	216	21%	57	19%	159	22%	82	20%	134	22%
In another TV show	85	8%	13	4%	71	10%	33	8%	52	8%
In a music video clip	135	13%	33	11%	102	14%	58	14%	76	12%
In another kind of TV broadcast	34	3%	8	2%	26	4%	17	4%	17	3%
I'm not sure/ I don't remember	19	2%	9	3%	9	1%	4	1%	14	2%

Digital and TV exposure to alcohol advertising

Overall, a substantial 87% of the sample reported seeing **alcohol advertising** on either digital or audiovisual media in the last 30 days (Table 6). Internet (66%), social networks (68%), and national TV (62%) are all significant channels.

Similar to positive portrayals, individuals **more than 18 years old** show significantly higher exposure to alcohol advertising on either digital or audiovisual media (91%) compared to those under 18 (91% vs 78%, χ^2=30.18, p<0.001). This significant difference is particularly evident for Internet (71% of adults vs 56% of minors, χ^2=20.98, p<0.001) and social networks (75% of adults vs 54% of minors,χ^2=42.54, p<0.001). It is also observed national TV advertising (65% of adults vs 55% of minors,χ^2=10.42, p<0.001).

Surprisingly, no significant difference emerged between genders. Nevertheless, **drinkers** (91%) have a significantly higher exposure rate than non-drinkers (81%, χ^2=19.23, p<0.001) to alcohol advertising on either digital or audiovisual media. This overexposure of drinkers is particularly striking for digital channels, i.e., regarding the Internet (70% vs 60% of non-drinkers, χ^2=11.12, p<0.001) and even more for social networks (75% vs 59%, χ^2=27.12, p<0.001). Drinkers are more likely to receive alcohol-related content, due to their previous browsing experiences.

Social class was likely to explain overall significant exposure to alcohol advertising through digital or audiovisual media. However, this variable did not appear to be a major factor in relation to each specific medium (Internet, social networks or national TV).

Awareness of the ban on alcohol advertising aimed at minors does not significantly interfere with exposure to this type of communication via digital or audiovisual channels. In contrast, the respondents who **fully or somewhat disagreed** with the ban of advertising directed to minors (including the undecided) had a statistically significant higher exposure (88%) to alcohol advertising on either digital or audiovisual media compared to those who agreed (88% vs 87%, χ^2=17.06, p<0.001). Among these 1 204 young people, heavy to intensive ISN users (89%) show significantly higher exposure than low to moderate users (85%) on either digital or audiovisual media.

Table 6. Effective exposure to audiovisual or digital alcohol advertising in France (N=1 024)

Have seen alcohol advertising, in the last 30 days		On Internet			On social networks			On national TV			On either digital or audiovisual media		
		n	%total	%cat.	n	%total	%cat.	n	%total	%cat.	n	%total	%cat.
In the whole country sample		680	66%	66%	701	68%	68%	636	62%	62%	890	87%	87%
Age	Under 18	170	17%	56%***	163	16%	54%***	165	16%	55%**	237	23%	78%***
	More than 18	510	50%	71%***	537	52%	75%***	470	46%	65%**	653	64%	91%***
Gender	Male	336	33%	67%	345	34%	69%	309	30%	62%	445	43%	89%
	Female	338	33%	67%	349	34%	69%	319	31%	63%	432	42%	85%
	Non-binary	1	0%	15%	0	0%	5%	1	0%	15%	4	0%	43%
	Other	6	1%	60%	6	1%	60%	7	1%	69%	10	1%	100%
Drinking status	Drinkers	436	43%	70%***	462	45%	75%***	390	38%	63%	561	55%	91%***
	Non drinkers	244	24%	60%***	239	23%	59%***	246	24%	61%	328	32%	81%***
Declared economic category	Superior	274	27%	68%	280	27%	70%	249	24%	62%	362	35%	90%*
	Lower to intermediate	406	40%	65%	420	41%	67%	387	38%	62%	528	52%	85%*
Knowledge of the ban to advertise alcohol to minors	Yes	277	27%	66%	295	29%	71%*	242	24%	58%	365	36%	87%
	No	403	39%	66%	405	40%	67%*	394	38%	65%	525	51%	87%
Acceptance of ban on advertising to minors	Fully or somewhat agree	527	51%	67%	545	53%	69%	493	48%	62%	685	67%	87%***
	Fully or somewhat disagree or don’t know	154	15%	66%	155	15%	66%	143	14%	61%	205	20%	88%***
Internet or social network (ISN) use	Heavy to intensive use	286	28%	70%	288	28%	70%	257	25%	63%	367	36%	89%*
	Low to moderate use	394	39%	64%	412	40%	67%	379	37%	62%	523	51%	85%*

Statistically significant difference at the 5% (*), 1% (**), 1‰ (***) level (χ^2 test).

Vectors of online of exposure to alcohol advertising

With regard to the specific online activities where alcohol advertising is encountered (Table 7), b**rowsing stories on social networks** is the most common digital activity for encountering alcohol advertising, cited by 51% of respondents. **Accessing music or videos** comes in second place with 34%.

Young adults aged 18 to 21 consistently reported higher levels of engagement in most digital activities likely to expose them to alcohol advertising than minors. Logically–since their age is linked to their account, and advertising alcohol to adults is legally permitted– they are three times more likely to have been exposed to alcohol advertising when posting content on their accounts. **Heavy to intensive users** of the internet and social media also reported higher rates of engagement in these digital practices than their more moderate counterparts. Regardless of age, nearly a quarter of young people (22% of minors, 23% of adults) are exposed to alcohol advertising when searching for information or news, activities that are more likely to be frequent in relation to studies.

Table 7. Digital activities conveying alcohol advertising in France (N=1 024)

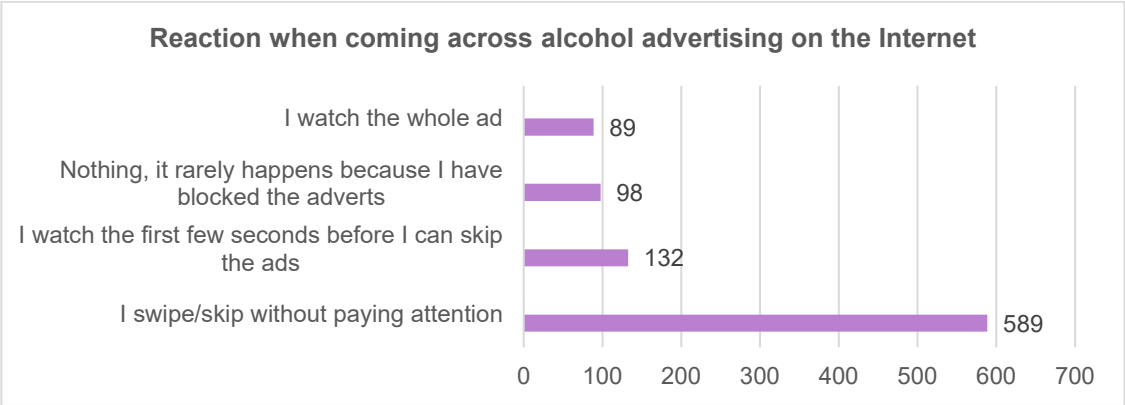
Internet channels of alcohol advertising	In the whole country sample		Under 18		More than 18		Heavy to intensive ISN user		Moderate to low ISN user	
	n	%total	n	%cat.	n	%cat.	n	%cat.	n	%cat.
When browsing stories on social networks	521	51%	120	40%	400	56%	218	53%	302	49%
When posting on your account	70	7%	8	3%	62	9%	41	10%	29	5%
When accessing music or videos	348	34%	68	23%	280	39%	148	36%	199	32%
When playing games online or via an App	138	14%	24	8%	115	16%	59	14%	80	13%
When searching for information or news	236	23%	67	22%	169	23%	100	24%	136	22%
When making purchases (clothes, books, games, sporting equipment etc.)	170	17%	42	14%	128	18%	63	15%	107	17%

Attitudes towards digital alcohol advertising

One-third of French respondents (31% of the whole sample) said they had not seen any digital alcohol advertising in the past 30 days. However, this is not primarily due to technical settings, as 38% of them used ad blockers. Among those who were spared from advertising content, young adults (18 and over) were nevertheless more likely than minors to use ad blockers (43% used them, compared to 30% of minors).

The majority of respondents (589 out of 1 024, 58%) indicated that they **"swipe/skip without paying attention"** when coming across alcohol advertising on the Internet (Figure 4). Only a small number (n=89, 9%) reported watching the whole ad. However, 13% (132) said they watched the first few seconds before being able to skip the adverts and the young adults, at 15%, were twice as likely to do so as minors (8%).

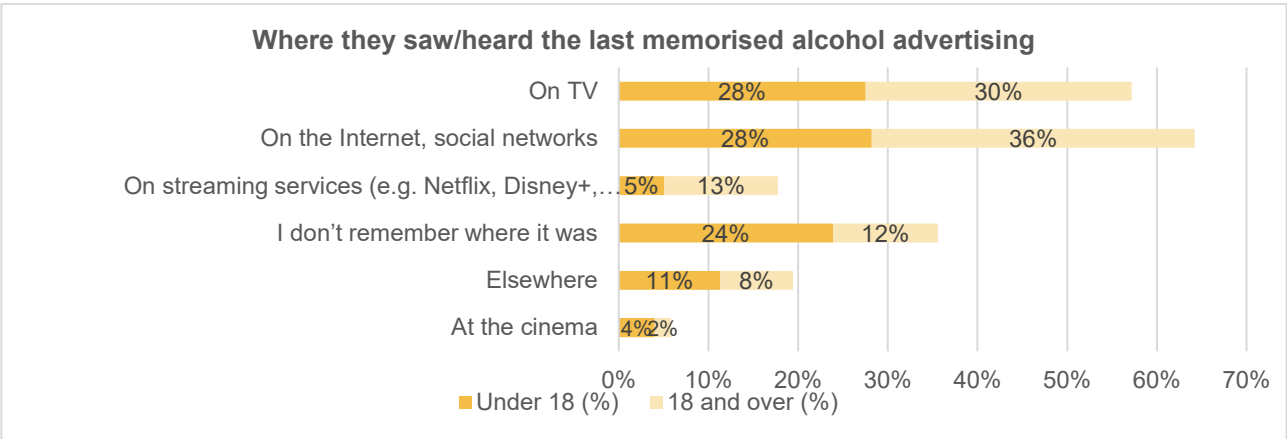
Figure 2. Reaction when coming across alcohol advertising on the Internet (N=1,204)



Impact of the last remembered alcohol advertising

Young people were asked about the space where they saw/heard the last memorised alcohol advertising (Figure 5). Among all media, **Internet and social networks (34%)** were the most frequently recalled locations, followed closely by **TV (29%)**. Streaming services (10%) and cinema (2%) were less common. The **"18 and over" group consistently recalled higher rates** of advertising exposure across Internet/social networks, TV and streaming services compared to the "Under 18" group.

Figure 3. Where they saw/heard the last memorised alcohol advertising



Memorising advertised alcohol brand

Most of French respondents (738, 72%) said they did not remember the brand in the last alcohol advertising they kept in mind, while 286 did (28%, Figure 6). In this minority who were able to specify the brand promoted, slightly more had not tried the brand before (145) than had tried it (138). Then, being a drinker (181 out of 286, 63%, versus 104 non-drinkers) seems to be a more significant factor in brand recall than having already tried it (51%).

In the end, 50 could not name any brand but only mention a type of alcohol (beer, wine, vodka), while the other 236 cited 47 different alcoholic beverage brands. Heineken® ranked first of the recalled brands, followed by Jack Daniel's®, Desperados® and Ricard® (Figure 7). These top four brands accounted for a substantial 65% of all brand citations, indicating their strong presence in advertising campaigns and popularity among the young public at the time of the survey.

Figure 4. Memories of the brand in the alcohol advertising lastly seen or heard (n=236)

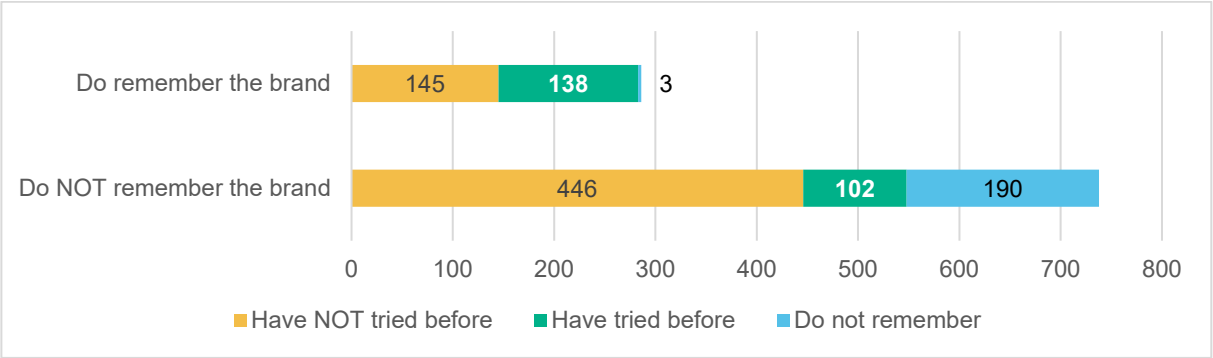


Figure 5. Brands advertised in the last memories of alcohol advertising



Desire to drink generated

Overall, 18% of respondents reported that the last remembered advertisement made them **want to try** the specific type of alcohol, and 16% actually **tried the advertised brand since then**. **Age is a significant** driver of such feeling and action. The young **adults** were significantly much more likely to want to try compared to minors (22 vs 9%, χ^2=26.88, p<0.001) wanted to try, 5% tried). They were also significantly more likely to have tried the advertised brand compared to youngsters **under 18** (20 vs 5%, χ^2=34.62, p<0.001).

A high proportion of **drinkers** was similarly observed among those who reported being tempted by alcoholic beverages seen in advertisements. **Drinkers** were significantly more likely to report wanting to try than non-drinkers (26% vs 7%, χ^2=56.45, p<0.001) and having tried (23% vs 4%, χ^2=65.75, p<0.001).

Finally, no significant difference between the sexes was found with regard to the desire to consume alcohol prompted by advertising. Nevertheless, a higher proportion of men reported having tasted the alcohol promoted in the advertisement (18%) than women (13%, χ^2=4.73, p<0.001).

When drinkers (619, or 60%) are asked about their main motivations for drinking alcohol, despite exposure and some desire generated by ads, few cite advertising. Advertising ranks last on the list of motivations (3%), on par with celebrity endorsements. The primary drivers cited by young drinkers are **taste** (46% of drinkers), the **socializing** and **euphoric** nature of alcohol during celebrations (36%), and the **sensation** it provides (26%).

Table 8. Reaction prompted by the last remembered alcohol advertising in France (N=1 024)

What the last advert you remember triggered in you?		Wanted to try this specific type of alcohol			Tried the advertised alcohol brand since then		
		n	%total	%cat.	n	%total	%cat.
In the whole country sample		186	18%	18%	160	16%	16%
Age	Under 18	26	3%	9%***	16	2%	5%***
	More than 18	160	16%	22%***	144	14%	20%***
Gender	Male	95	9%	19%	91	9%	18%*
	Female	91	9%	18%	66	6%	13%*
	Non-binary	1	0%	6%	3	0%	33%
	Other	0	0%	0%	0	0%	0%
Drinking status	Drinkers	158	15%	26%***	143	14%	23%***
	Non drinkers	28	3%	7%***	17	2%	4%***

Statistically significant difference at the 5% (*), 1% (**), 1‰ (***) level (χ^2 test).

Perceived impact of alcohol advertising on young people

Young people could express their opinion on advertising's effectiveness on themselves and peers (Table 9). An overwhelming majority of respondents, **81%, believe that alcohol advertising on the Internet "works on young people"**. The over 18 are more likely to retain this position (83%) than minors (83% vs 76%, χ^2=7.85, p<0.001). **Females (86%)** are more likely than males (76%) to hold this opinion (χ^2=15.79, p<0.001). **Drinkers (87%)** are also significantly more likely than non-drinkers (72%) to believe that internet alcohol advertising influences young people (χ^2= 22.00, p<0.001).

Table 9. General opinion on the impact of alcohol advertising in France (N=1 024)

Do you think alcohol advertising on the Internet **works** on young people?		It works			It does not work		
		n	% total	%cat.	n	% total	%cat.
In the whole country sample		828	81%	81%	196	19%	19%
Age	Under 18	229	22%	76%**	74	7%	24%
	More than 18	599	58%	83%**	122	12%	17%
Gender	Male	381	37%	76%***	120	12%	24%
	Female	434	42%	86%***	71	7%	14%
	Non-binary	7	1%	79%	2	0%	21%
	Other	7	1%	74%	2	0%	26%
Drinking status	Drinkers	539	53%	87%***	80	8%	13%
	Non drinkers	289	28%	72%***	115	11%	28%

Statistically significant difference at the 5% (*), 1% (**), 1‰ (***) level (χ^2 test).

Acceptance of advertising and alcohol control policies

Acceptance of advertising

Overall, a little more than half of respondents have a **"mixed or no opinion"** on the **appropriateness** of alcohol marketing **(56%)**. As shown in Table 10, another large proportion expressed a **"full disapproval"** in this regard **(39%)**. Finally, only a minority "fully approved" advertising by the alcohol industry (5%).

Most of young people support the principle of banning alcohol advertising aimed at minors, whether they are minors themselves (83%) or adults (74%). Those who **fully or somewhat agree with the ban on advertising to minors** express significantly higher full disapproval (42%) than those who disagree or don't know (27%). Conversely, those who **disagree or don't know about the ban's acceptance** are significantly more likely to approve alcohol advertising (11%).

Gender differences emerged in the acceptance of alcohol advertising activities. **Women** expressed significantly stronger **disapproval** than men regarding alcohol advertising (46% vs. 33%, χ^2=17.58, p<0.001). Conversely, men were twice as likely as women to approve of alcohol advertising (8%).

Respondents who **know about the ban** to advertise alcohol to minors express higher full disapproval (44%) than those who don't know (36%). Those who **don't know about the ban** are significantly more likely to express full approval (6%).

Table 10. General opinion on alcohol advertising in France (N=1 024)

How would you summarize your **opinion** on alcohol marketing?		Full disapproval			Full approval			Mixed or no opinion		
		n	% total	%cat.	n	% total	%cat.	n	% total	%cat.
In the whole country sample		398	39%	39%	56	5%	5%	570	56%	56%
Age	Under 18	114	11%	37%	9	1%	3%*	180	18%	59%
	More than 18	284	28%	39%	47	5%	7%*	389	38%	54%
Gender	Male	165	16%	33%**	38	4%	8%**	298	29%	59%**
	Female	231	23%	46%**	18	2%	4%**	256	25%	51%**
	Non-binary	1	0%	16%	0	0%	0%	7	1%	84%
	Other	1	0%	6%	0	0%	0%	9	1%	94%
Drinking status	Drinkers	249	24%	40%***	46	5%	7%***	324	32%	52%**
	Non drinkers	148	15%	37%***	10	1%	2%***	246	24%	61%**
Economic category	Superior	156	15%	39%	29	3%	7%	216	21%	54%
	Lower and Intermediate	242	24%	39%	28	3%	4%	354	35%	57%
Knowledge of ban on advertising to minors	Yes	183	18%	44%	22	2%	5%	213	21%	51%***
	No	215	21%	36%	34	3%	6%***	357	35%	59%***
Acceptance of ban on advertising to minors	Fully or somewhat agree	334	33%	42%***	30	3%	4%***	426	42%	54%***
	Fully or some-what disagree or don't know	64	6%	27%***	26	3%	11%***	144	14%	62%***

Statistically significant difference at the 5% (*), 1% (**), 1‰ (***) level (χ^2 test).

Acceptance of advertising regulation

Participants were asked whether they agreed with, or not, about a list of principles of legal restrictions on alcohol advertising or on other economic areas, regardless they were in force in their country. The examples of legal restrictions related to alcohol advertising were: ban on alcohol ads on public transport on the internet, on tv, ban on alcohol brands in videos, etc., ban on endorsement by celebrities, ban on advertising near schools, etc., ban on advertising to minors, time restrictions for alcohol ad.

A third of the French participants claimed they agreed with all the legal restriction listed regarding alcohol advertising, with important discrepancies across all demographics considered and knowledge of law (Table 11). Minors are twice as likely as adults to adhere to various forms of advertising restrictions (51% vs 25% respectively). Among females, 36% support such legal restrictions, compared to 29% of men. Unsurprisingly, drinkers are generally more accommodating to advertising than non-drinkers, with 24% agreeing to the proposed package of restrictions compared to 45% among non-drinkers. Young people from well-off households are also less likely to adhere to these restrictions than those from less well-off households (27% versus 36%), as are those who are unaware of the ban on advertising to minors compared to young people who are aware of this ban (29% versus 38%).

Table 11. General opinions on alcohol legal restrictions in France (N=1 024)

Fully or somewhat agree with legals restrictions on alcohol advertising		n	% total	%cat.
In the whole country sample		334	33%	100%
Age	Under 18	154	15%	51%
	More than 18	181	18%	25%
Gender	Male	144	14%	29%
	Female	182	18%	36%
	Non-binary	3	0%	32%
	Other	4	0%	47%
Drinking status	Drinkers	151	15%	24%
	Non drinkers	183	18%	45%
Economic category	Superior	109	11%	27%
	Lower and Intermediate	226	22%	36%
Knowledge of the ban to advertise alcohol to minors	Yes	159	16%	38%
	No	175	17%	29%

Conclusion on the quantitative study

In summary, the survey evidences that positive portrayals and advertising of alcohol are highly prevalent in France. Such promotional content for alcohol is particularly noticed by young adults (represented here by the 18–21 age group), drinkers (in the last 30 days) and heavy users of the Internet and social media (ISN). In this regard, gender and social class play a minor role overall. A significant portion of the young people believe these advertisements may influence peers, advertising itself is not considered by the young population to be their primary motivation for consuming alcohol. They are more inclined to prioritise taste and social aspects as the main triggers for their consumption. Nevertheless, regardless of age, drinkers are more likely to try an alcohol seen in an advertisement than non-drinkers, suggesting the determining role of advertising in alcohol consumption. The public generally holds mixed or disapproving views on alcohol marketing, particularly those aware of or in agreement with advertising bans.

GENERAL CONCLUSION

This study, the CIPPAL-ADAM monograph for France, reveals complex interactions between France's restrictive alcohol advertising regulations, young people's exposure to alcohol marketing, and their perceptions of its impact. While French regulations are among the world's most stringent, particularly the Évin Law, evolving digital landscapes and marketing strategies continually challenge their effectiveness.

Youth's awareness of the exposure to alcohol advertising

Young people in France demonstrate an **ambivalent relationship with advertising**, often underestimating their actual exposure while exhibiting a high degree of "critical competence" towards explicit marketing.

There is a gap between perceived and actual exposure to ADAM. While many interviewees claim not to be highly exposed, often due to active avoidance strategies like fast-scrolling or skipping ads, the online survey reveals a **widespread actual exposure**. For instance, **75%** of the total sample reported seeing **positive portrayals of alcohol** on some media in the last 30 days, with online exposure being more common than tv or cinema. A substantial **87% reported seeing alcohol advertising on either digital or audiovisual media**.

Alcohol advertising is somewhat normalised, while having blurring boundaries. The perceived low visibility of alcohol marketing doesn't mean a lack of objective exposure; rather, it indicates a deep acculturation to an environment saturated with commercial messages, where alcohol advertising blends seamlessly with entertainment and peer communication. In France, young people often confuse commercial advertisements with public prevention campaigns, using the term "advertising" indiscriminately for both, which can obscure their understanding of the true intent of messages. This overall shortcoming deserves consideration so that prevention campaigns are clearly recognised as such and their purpose (alcohol consumption) is clearly identified as a public health concern.

Implicit marketing is likely to have stronger impact on young people. While explicitly identified advertisements (e.g., brand ads on digital channels) are often perceived as intrusive and are readily dismissed, **implicit, integrated, or algorithmic marketing forms a less visible but powerful influence** on their exposure and consumption norms. Content from "close" contacts, including **influencers with small to medium audiences,** is considered more persuasive than institutional or commercial messages, highlighting the power of social and cultural identification.

Digital media are widely singled out by young people as a vehicle for alcohol advertising, but this should not diminish the potential role of physical media. Despite their heavy digital use, young people more often recall traditional outdoor advertising (e.g., billboards in metros or bus stops) than digital ads, perhaps because these physical ads are unavoidable. However, Internet and social networks are still the most frequently recalled locations for the last remembered alcohol advertisement (34%), followed by TV (29%).

The role of alcohol marketing in drinking alcohol

Young people largely express **scepticism regarding the direct impact of alcohol advertising on their own drinking habits**, attributing influence more to social and cultural factors. The narratives suggest that alcohol advertising functions more as a **reinforcement of pre-existing consumption habits** rather than a trigger for new purchases or drinking practices. For instance, young people more easily recall ads for beers, spirits, or sweetened drinks that they already consume.

Through their narratives, young people typically exhibit a "third person effect," believing that while alcohol advertising "works on young people" in general (81% of respondents), they themselves are **immune to its persuasive effects**. This cognitive bias allows them to maintain an image of themselves as autonomous and rational consumers.

Advertising is ruled out by young people as a primary driver of alcohol consumption.: When asked about their main motivations for drinking, young people overwhelmingly prioritise taste (46%), the social and euphoric nature of alcohol during celebrations (36%), and the sensation it provides (26%). Advertising ranks last among these motivations (3%), on par with celebrity endorsements.

Alcohol consumption is presented as deeply embedded in social and relational structures. The family unit often acts as the first point of initiation, normalising certain products like wine as part of culture and tradition. Peers play a determining role in defining consumption norms and encouraging trying new drinks. Media like music videos, series, and films also shape perceptions, presenting alcohol as a social enabler, a rite of inclusion, or a marker of maturity. The Fear Of Missing Out (FOMO), intensified by social media's depiction of festive gatherings, also implicitly normalises alcohol consumption as a pathway to social inclusion.

Impact of regulations in the national framework

Despite France's legally stringent regulatory framework, young people perceive a **significant gap in its effectiveness, particularly in the digital sphere**, due to enforcement challenges and inherent ambiguities.

Despite limited knowledge of this legal framework, particularly with regard to advertising restrictions, there is widespread acceptance of it. Young people generally have a limited insight into the specific regulations governing alcohol advertising in France, especially concerning online channels and the legal protection for minors. In other words, they seem to ignore that preserving minors from advertising is a governmental concern. This lack of knowledge contributes to a perception of inconsistency or ineffectiveness in the law's application, particularly when they observe ubiquitous advertising in public and digital spaces.

Nevertheless, French young people overwhelmingly adhere to a ban on alcohol advertising aimed at minors, with minors even more supportive than adults (83% and 74% respectively). Furthermore, those who support such a ban on advertising aimed at minors disapprove of alcohol advertising to a significantly greater extent (42%) than those who disagree with the ban or who do not take a position (27%).

Loopholes are emerging in the effectiveness of advertising restrictions in the digital sphere. The legal framework, though robust in principle by banning what is not explicitly authorised, has struggled to keep pace with digital innovations. The **authorisation of online alcohol advertising in 2009 (Bachelot law) created a significant loophole**. Young people view platforms like Instagram®, Snapchat®, and TikTok® as **largely deregulated spaces**, where restrictions on content and targeting are difficult to apply or enforce.

Enforcement challenges arise. Regulatory bodies face **limited enforcement capacity due to a lack of resources** for monitoring advertising, especially on online platforms or foreign-based media accessible in France. The self-regulation framework, while comprehensive, is **voluntary and non-coercive**, leading to inconsistent compliance across stakeholders. Content generated by influencers or ordinary users, rather than direct industry ads, is often cited by young people as a source of promotional exposure that falls outside clear regulatory oversight.

A major problem is the desire of minors to access digital platforms and the techniques they use to circumvent restrictions. Minors readily circumvent age verification mechanisms on online platforms by falsifying their age, leading to algorithmic exposure to alcohol advertising intended for adults. This undermines the protective intent of regulations designed to shield younger audiences.

Industry influence remains strong. Powerful alcohol lobbies in France continuously challenge regulations, arguing against stricter interpretations and citing cultural heritage and economic interests, which can lead to the dilution of the law or the creation of exceptions. This further compromises the effectiveness of existing controls.

The bottom line is that even though French regulations on alcohol advertising are designed to be highly protective, particularly for youth, their **impact is significantly diluted by the pervasive and often subtle nature of digital marketing, the industry's continuous efforts to circumvent restrictions, and a perceived lack of stringent enforcement**. Young people's awareness of advertising is often overshadowed by their acculturation to a saturated media environment and their reliance on social and cultural cues as primary drivers for alcohol consumption, rather than explicit advertising messages. This highlights the **critical need for modernising the legal framework to address algorithmic advertising and influencer marketing**, along with fostering **cross-border collaboration** and expanding **media literacy education**.

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