



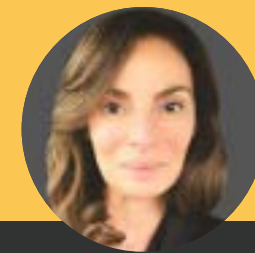
# CopyClear

**Annual Report**

**2022**



# Chairwoman's Intro



**A**fter two years of unrelenting pandemic related uncertainty, there were hopes and expectations that 2022 would see us return to a more familiar world with greater opportunities and freedoms.

January 2022, saw the lifting of all Covid restrictions which had held us back for close to two years. There was hope in the air. Then on the 22nd of February, Russia invaded Ukraine and the world tilted again.

Anxiety about the future of Europe rose and a humanitarian crisis began, which continues to this day. Energy prices soared and supply chains which hadn't yet recovered from Covid were disrupted further. Inflation began to rise significantly.

After two years of a pandemic, the resilience of the Irish public and the economy were tested again. Emotional and economic coping tactics re-visited.

Growth projections were relatively flat, albeit not in decline as per other economies. The job market remained stable and consumers bought less with the same budgets and this was reflected in Advertising spend.

Revenues spent by advertisers in the Republic are estimated to have increased by a modest 3.7 % to €1.38 billion, in what was a volatile media market.

- Online advertising showed a "significant slowdown" growing at 2.6% v an average growth of 17% since 2017.
- Radio revenues increased 7.8%
- Digital audio ad revenues had a strong 2022, +22.3 % to €12.6 million

- Print proved "more resilient than anticipated" with revenues flat at €82.4 million

- Out-of-home ad revenues, which suffered during the pandemic, grew at 24.1%

- Cinema advertising is also yet to fully recover from the Covid crisis. Ad spending on the big screen grew 62.2% to €3.52 million, but this remains less than half the €7.6 million level of spending seen in 2019.

Operationally, our experienced team of compliance managers within the four contract companies, were happy to return to the CopyClear office in February 2022, operating a hybrid working week throughout the year. This is envisaged to continue throughout 2023.

One of the positive impacts of Covid19 has been an increase in the number of Client meetings. During 2022, the Managers held over 60 Client meetings over Zoom, discussing both micro and macro issues, questions and campaigns, something that was more difficult to achieve with in-person meetings due to convenience and the time commitment they required.

CopyClear's mantra is 'to engage early and often'; Online meetings have certainly facilitated this. Whilst our Managers remain available for in-person meetings, many clients have opted for online meetings as this allows for attendance and input from multiple locations.

Our purpose at CopyClear, is to offer an alcohol marketing communications pre-vetting service, thus ensuring compliance with the

strict self-regulatory code of the Advertising Standards Authority for Ireland (ASAI).

The ASAI code mandates that alcohol related communications should be consistent with responsible consumption and in no way appeal to children or encourage them to drink. CopyClear ensures users compliance to the ASAI code, therefore eliminating the risk of refusal and incurring hefty costs at a progressed stage of production.

The number of upheld complaints to the ASAI continues to be very low, with only one complaint upheld related to alcohol communications for all of 2022 from CopyClear users, a testament to a system that is working.

Submissions in 2022, were 9,688 and practically on a par with those of 2021. Digital communication submissions remain high at 47%, a slight increase on 2021.

Of the non-compliant assets, 304 (18.3%) did not contain Responsibility Messaging. Whilst this is an improvement on 2021, it is still a considerable number. Each of these submissions cost our Clients money, and more importantly time, as the asset needs to be re-submitted thus delaying approvals unnecessarily.

All of these issues are addressed through our CopyClear Training sessions and we continue to highlight this issue to our users through marketing communications, direct contact with Managers, as well as automated reminders whilst uploading assets to the CopyClear website for submission.

CopyClear Training Sessions took place in May and October 2022. These are open to all CopyClear clients, brands and agencies, and we highly encourage attendance. Each session lasts about 90 minutes and takes place online. The CopyClear Managers also provided two bespoke training sessions upon special request from our clients and two training sessions for users of the Drinkaware licence.

CopyClear also met with DrinkAware and the ASAI as a matter of course, to discuss ways of working and legislative updates as required.

2018 saw the Public Health (Alcohol) Act being passed, which has the potential to dramatically restrict the scope of alcohol marketing communications in Ireland. We saw the start of this in November 2019 when restrictions on the use of cinema and OOH media were introduced.

Proposed copy for labelling in Ireland has been submitted by the Irish government and a standstill period is in use to address concerns of the countries which issued detailed opinions and stakeholders are continuing to engage with the institutions and the Irish government.

We are some time away from the full implementation of this Act, and as we move into 2023, the self-regulatory ASAI code still provides the strictest controls on the marketing communications of alcohol in Ireland. At CopyClear, we remain dedicated to helping our clients comply fully with the letter and spirit of that code.

Caroline Sleiman | Chairwoman.



# 2022 Submissions

**COMPLIANT**

**6,325**

**70%**

**TOTAL  
DOMESTIC**

**9,302**

**NON-  
COMPLIANT**

**1,523**

**16%**

**COMPLIANT**

**242**

**65%**

**TOTAL  
OVERSEAS**

**375**

**NON-  
COMPLIANT**

**83**

**22%**

**TOTAL 9,688**

**COMPLIANT**

**6,567**

**67.8%**

**NON-  
COMPLIANT**

**1,606**

**16.6%**

\*This data does not include non-valid, incomplete submissions or approval of Ambassadors.

A Note on Submissions: A 'submission' is any piece of marketing communications that needs to be considered by the CopyClear compliance managers in terms of compliance with the ASAI code and which has been duly submitted through the CopyClear website by a registered user of the service. This could be a single 48-sheet (billboard) or it could be a social media calendar covering a given month's proposed posts across two or more channels, e.g. Facebook and Instagram. Even though one of these collected posts may only be a thumbnail, it must be given due consideration. Given the tilt to online usage, this can mean that what is counted as a single submission can occupy the managers for a disproportionate amount of time.



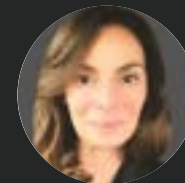
**Central Copy Clearance Ireland, trading as CopyClear, was established in 2003. It is a separate, independent company with its own board of directors.**



# Board of Directors

## **Caroline Sleiman**

Director &  
Co Owner  
of Coffeeangel.



Caroline is Co Owner and Director of Coffeeangel, a group of five independent, award-winning specialty coffee shops based in Dublin City Centre. Coffeeangel is widely acknowledged as being the founder of specialty coffee in Ireland. A trilingual, highly motivated, result focused Director with a 20 year + record of success in the drinks industry. Caroline started her career as Brand Manager at Interbrew working on a portfolio of beer brands before relocating to Dublin to work for Edward Dillon. During her 15 year tenure with Edward Dillon, Caroline managed numerous luxury brands such as Hennessy Cognac, Moet & Chandon, Dom Perignon, Krug, Ruinart, Veuve Clicquot, Cloudy Bay wines, Jack Daniels, Wolf Blass, Redbreast and Sandeman Port amongst others. Caroline also runs a Marketing Consultancy Service for luxury brands, with clients such as the National Gallery of Ireland and the Hugh Lane Gallery. ■



### Barry Dooley

**Chief Executive,  
Association  
of Advertisers in  
Ireland (AAI).**

The AAI champions the freedom to promote responsible and effective marketing communications, and thereby enable businesses to communicate with consumers and citizens. Barry was a Board Director of Irish International Advertising for 20 years and a Board Director of The Institute of Advertising Practitioners (IAP) for six years. He has extensive experience in all matters to do with advertising having worked on many new product launches and campaigns for most of Ireland's iconic brands. Barry has worked on the Agency and Client side of the business and was a product group manager on Bulmers Cider in Showerings Ireland Limited for 3 years. ■



### John Gildea

**Business Director,  
Owens DDB.**

John Gildea is a Business Director with Owens DDB responsible for Account Management and New Business for the agency. Having started his career in the graduate program at DDB London his move to Ireland in 2006 has since seen him work on brands as diverse as SEAT, The Irish Times and Virgin Media. ■



### Charley Stoney

**CEO, Institute of Advertising  
Practitioners  
of Ireland (IAP).**

Charley spent four years as Managing Director of Alternatives, and before that, she was Managing Director of leading field marketing agency, FMI Ltd, for six years. Her 25-year career to date has been spent predominantly in marketing agencies both in the UK and Ireland. She learnt her craft in Target Marketing before moving to the UK and after nearly a decade there, she returned to Ireland in 2003, to join McConnells Advertising where she founded and became Managing Director of McConnells Fusion. ■



### Louise Smith

**Business Director, Folk  
Wunderman Thompson.**

Louise joined Folk Wunderman Thompson in 2019 as an Account Director, leading on consumer and sponsorship communications for Vodafone. She kick-started her advertising career in London as an executive, working for Gravity Global and Ogilvy London with financial clients including Investec and American Express International, then shifting focus towards the beauty world with a range of projects for Walgreens Boots Alliance Global Makeup Brands. After over seven years in London, this Dublin native decided it was time to head home to the Emerald Isle to work for Ogilvy Dublin where she delivered successful campaigns for Boots, FBD Insurance and Trócaire. ■



### Cian Corbett

**Digital Content  
Marketing  
Manager, AIB.**

Cian manages a team of digital experts and in-house Studio to oversee the digital content production for AIB and EBS since 2018. Before joining AIB Cian spent 8 years on agency side, most of which was spent with Core developing digital strategies for Three Ireland, Toyota, Spar and Aviva. ■



### David Quinn

**Managing Partner,  
Bloom.**

David is co-founder and managing partner of Bloom – an independent creative agency. He has over 20 years' experience in the advertising business working with a wide range of clients from start-ups and FMCG brands to political parties and third level colleges. He has a particular passion for working with 'challenger brands' and is proud of the role he has played in the success of many of Ireland's leading challengers. David was also one of the founders and artistic director of Punchbag Theatre Company in his native Galway and is a graduate of UCG. ■



### Robyn O'Mara

**CMO, Electric Ireland  
Superhomes.**

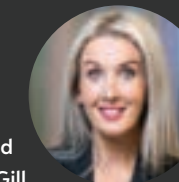
Prior to Electric Ireland, Robyn spent 12 years as Marketing Communications Manager in the banking industry with First Active, Ulster Bank and KBC Bank. Moving away from banking Robyn took up a contract role in Eircom during the rebrand of Eircom to eir in 2015/16, having initially started her career as a Sales Rep for Eircom in 2003. Her 19-year career to date has been spent predominantly in marketing communications and now focuses on communication strategy and marketing effectiveness. ■



### Gill Blake Swift

**Head of Marketing  
Communications,  
KBC Bank Ireland.**

Prior to joining KBC and the world of banking, Gill worked with market leaders in both the food and beauty industry. Having spent 8 years in various roles with L'Oreal, including 3 years as Senior Product Manager for La Roche-Posay, she traded beauty for burgers and joined McDonalds. Gill is also a co-founder and Non-Executive Director of men's grooming retail brand, Frankman. ■



# Compliance Managers



**Joe Clancy**  
Co-Activation  
Limited.

Joe spent 10  
years in London  
working in

advertising with Brunnings and the Young & Rubicam Group. He returned to Ireland to join Hunter, later becoming MD at Bates and Red Cell, and then CEO of Young & Rubicam. He has managed campaigns for iconic brands such as Land Rover, Smirnoff, Baileys, Club Orange, Pfizer, Bayer, Zanussi, and Johnson & Johnson. Joe served on the Executive and the Council of The Marketing Institute of Ireland during which time he was also a member of The Marketing Society. He was a Board Member of Central Copy Clearance Ireland (Copyclear) from 2008 until 2012. ■

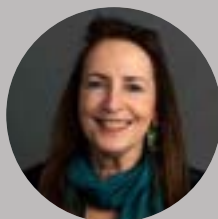


### **Lynne Tracey**

**El Soci Limited.**

Lynne's career began with Campaign in Dublin and then with McCann-Erickson,

New York. She moved back to Dublin as a founding Director of McCann-Erickson and subsequently moved to the Javelin Group as a Director. Lynne was the first female President of the Institute of Advertising Practitioners in Ireland, she also served on the Board of the Advertising Standards Authority for Ireland, the Advertising Benevolent Society (TABS) and CCCI (CopyClear). She currently lectures on the MSC in Advertising in TU Dublin and has been with CopyClear since 2007. Lynne has extensive experience working with not-for-profit Boards. She served on the Well Woman Board for five years and chaired the Board for two. She is currently on the Board of the Transgender Equality Network Ireland (TENI) and is Chairperson of the New Theatre in Dublin's Temple Bar. ■



### **Mags McLoughlin**

**Mags McLoughlin Consultancy Limited.**

Mags McLoughlin joined CopyClear

in November 2014. She has over 20 years' experience in communications and marketing in Ireland and overseas, working in a variety of sectors including financial, FMCG, automotive, telco and not for profit sectors. She has worked on both the agency and client side of the business and as independent consultant. Mags has extensive experience in bringing products to market, developing launch or repositioning communications, overseeing award winning creative and implementing CRM and customer retention programmes. In 2001 Mags set up Pennies for Heaven, a euro changeover charity, which raised €7.5m for 11 Irish charities. ■



### **Denis Goodbody**

**Write On Limited.**

Denis Goodbody has been a copywriter and communications

strategist since the mid-1980s, working with: McConnells, DDFH&B, QMP, The Helme Partnership (Creative Director), and HDM Dechy in Brussels. He co-founded Adept Advertising in 1996 and has been an independent consultant since 2011. Along the way he's been President of ICAD, a board member of IAPI, and has won his share of awards: ICAD, Shark, Posters, Clio, Mobius, Epica. Clients have included: Most banks, most cars, most major breweries, Masterfoods, P&G, Unilever, Apple, Microsoft, IDL and many more. Most proud of? Probably The Euro Changeover and Mary McAleese's presidential campaign. Outside of advertising he has a weekly music show on 103.2 Dublin City FM, has published two books and has co-written a few songs that weren't jingles! ■





# Operational Overview



CopyClear deals with one part of the promotion of alcohol and operates

on the basis that alcohol companies submit details of their planned campaigns in advance so that they can be vetted to ensure that they are compliant with the ASAI code. This has resulted in very few complaints about alcohol advertising to the Advertising Standards Authority for Ireland since CCCI/ CopyClear was established.

CopyClear compliance managers and general management met regularly during 2022 with representative bodies, brand owners and agencies to ensure understanding of the codes

and how they are applied.

CopyClear continues to promote an open door policy to discuss campaign ideas before they are submission ready- this helps ensure compliance in the work finally submitted and can help the creative and production process along the way.

In 2022, Copyclear reviewed 9,688 submissions, a small decrease of 1% over the 2021 submission numbers. It should be noted that the COVID-19 pandemic resulted in a reduced level of demand in 2020 from users. This total includes all versions of a campaign, including preliminary concepts, adaptations and finished work. Managers also review casting, locations and assay

the appropriateness of influencers. The number of advertisements that eventually appear online, in print or broadcast is naturally lower than the number of submissions considered.

Of the 9,688 submissions considered and assessed, 6,567 of them were compliant, an approval rate of 68%, with 1,606 (17%) non-compliant and therefore not published or broadcast. These figures compare with a 71% approval and 16% non-approval rate in 2021. CopyClear considers submissions in all alcohol product categories and reviews all marketing communications aimed at the Irish consumer, whether from Irish sources or originating from overseas.

## CopyClear Remit

CopyClear's remit covers marketing communications for alcohol brand advertising broadcast or published in Ireland. CopyClear assesses submissions in accordance with the Codes of Practice of the Advertising Standards Authority for Ireland (ASAI) though companies and advertisers are also required to comply with other codes such as those of the Broadcasting Authority of Ireland and in the context of placement codes which are overseen by the Department of Health appointed Alcohol Marketing Communications Monitoring Body (AMCMB). This latter Code, which was agreed between the Department of Health and the alcohol



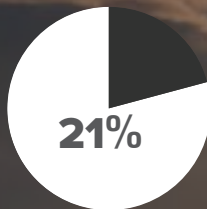
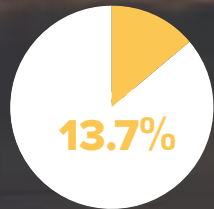
**CopyClear deals with one part of the promotion of alcohol and operates on the basis that alcohol companies submit details of their planned campaigns in advance so that they can be vetted to ensure that they are compliant with the ASAI code."**



### IRISH-BASED ADVERTISING AGENCY

2022

2021



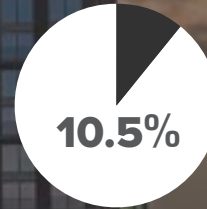
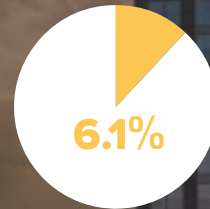
1,324

2,032

### IRISH-BASED MEDIA AGENCY

2022

2021



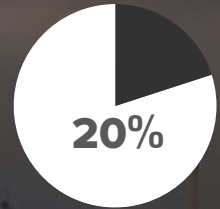
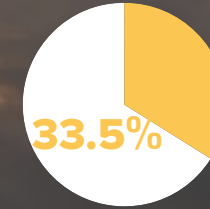
590

1,024

### IRISH-BASED DIGITAL AGENCY

2022

2021



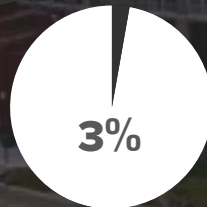
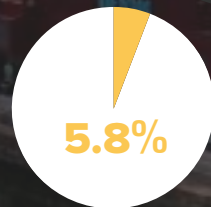
3,242

1,954

### OVERSEAS ADVERTISING AGENCY

2022

2021



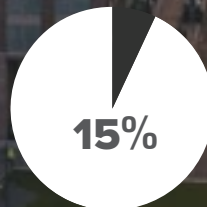
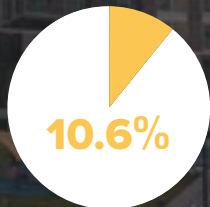
558

289



2022

2021



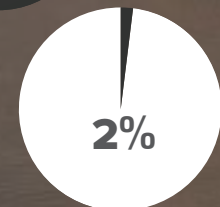
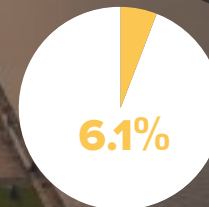
1,026

1,459

### OVERSEAS DIGITAL AGENCY

2022

2021



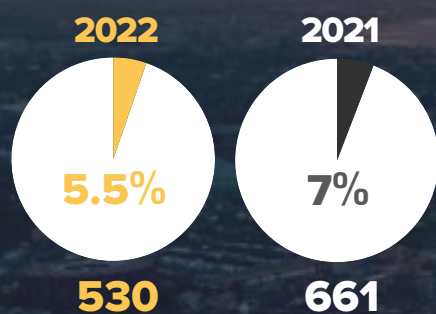
586

187

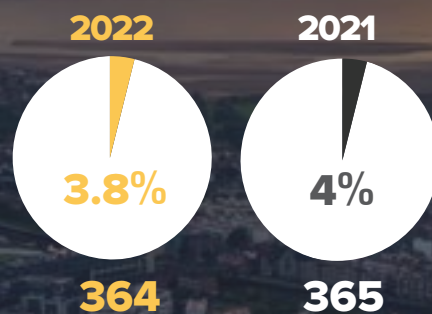




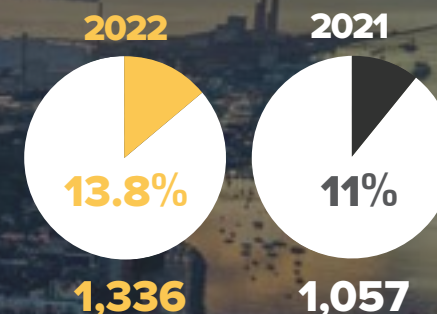
### TELEVISION



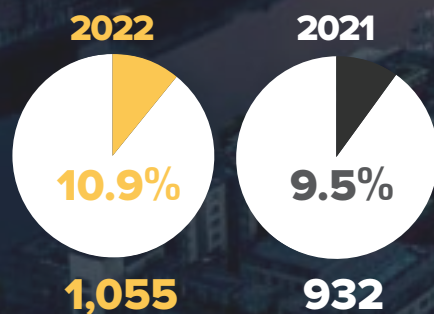
### RADIO



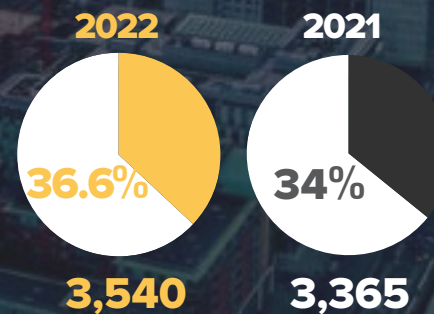
### OUT-OF-HOME



### OWNED ONLINE ACTIVATIONS



### PAID-FOR ONLINE ACTIVATIONS





**The rationale behind it was that the alcohol companies were keen to demonstrate their commitment to socially responsible marketing and promotion of their products.”**

and advertising industries, covers marketing and sponsorship and relates to a wide variety of locations in which alcohol marketing or promotion appears.

In addition, advertisers are also required to comply with industry codes such as those managed by the RRAI (Responsible Retailing of Alcohol in Ireland) which operates under the approval of the Department of Justice. These various codes cover retail outlets, off-licences, licensed premises and mixed retail outlets.

#### **The Development of CopyClear (Central Copy Clearance Ireland)**

Central Copy Clearance Ireland Ltd (CCCI) trading as CopyClear, is a separate independent company with its own board of directors, and is not a subsidiary of any other company or organisation. It was established in 2003, and was an initiative proposed following extensive discussions between the Association of Advertisers in Ireland

(AAI), the Institute of Advertising Practitioners in Ireland (IAPI) and the main alcohol - producing and marketing companies at the time. They presented it as a positive industry response to concerns expressed by the Department of Health and Children about the content of some advertising.

The rationale behind it was that the alcohol companies were keen to demonstrate their commitment to socially responsible marketing and promotion of their products. They agreed to set up an independent body, which would be funded by them but in which they would have no board representation or management role, which would act independently to assess the compliance of their proposed advertising campaigns with the relevant Codes of Practice and that they would accept the adjudications of CopyClear in the matter.

This arrangement was further strengthened by the involvement of the major media as delivery partners. As advertising would

appear in outdoor, broadcast or social media, it was important to engage the support of these channels in effectively implementing the CopyClear process. The result of this multi-party arrangement is that all advertisements must carry CopyClear approval and have a CopyClear certification number which has to be quoted and presented when the advertiser is seeking to have an advertisement placed— otherwise it is not accepted by the media for publishing.

Each individual piece of advertising is vetted. This can be copy, images or even concepts. The vetting, often at all stages of its production, is done by a group of managers experienced in the industry and trained in the Codes of Practice. Vetting applies to all advertisements intended to be run in the Irish media, whether made in Ireland or developed internationally.

The CopyClear board is made up of nine members, four each of whom

are nominated by the Association of Advertisers in Ireland (AAI) and the Institute of Advertising Practitioners in Ireland (IAPI) respectively, plus an independent Chairperson. None of the nominees come from the alcohol industry.

Administration of CopyClear is jointly provided by AAI and IAPI.

The service also allows for an appeals process so that an advertiser who might not be in agreement with the decision on their advertisement by CopyClear managers, can appeal for a review by the Appeals Committee. This Committee comprises the Chairperson and two other members of the board.

The model developed for CopyClear demonstrates how self-regulation in the area of alcohol advertising can work effectively.

Because advertising would appear in press, outdoor broadcast or social media, it was vital to engage the support of these channels in implementing the CopyClear process. ■





**Central Copy Clearance Ireland (CCCI).**

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Copyclear is the trading name for Central Copy Clearance Ireland (CCCI).