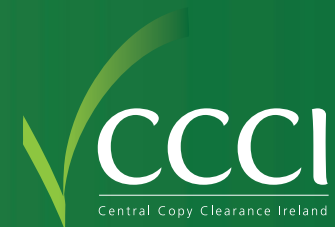




# CopyClear

## ANNUAL REPORT 2019

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# Chairman's Introduction

**T**he purpose of CopyClear is to offer a pre-vetting service for marketing communications related to alcohol in Ireland, to ensure their compliance with the strict self-regulatory code of the Advertising Standards Authority for Ireland (ASAI). This code mandates that alcohol related communications should be consistent with responsible consumption and in no way appeal to children or encourage them to drink. In our approach, CopyClear endeavours to be consistent in our decision making and approachable to our users, in order to help them fulfil their responsibilities in relation to the ASAI code.

In 2019, our compliance managers reviewed over 9,000 submissions to CopyClear. This represents an increase of around 9% on the previous year and marks a continuation of the upward trend in submission numbers. Within this total, digital communications continue to represent the greater portion accounting for 52% of all submissions. In absolute terms, submissions of digital communications rose by some 10% year on year. A key metric that we use to measure the

effectiveness of CopyClear is the number of upheld complaints to the ASAI against alcohol communications in a given year. This in effect represents communications that may have slipped through the pre-vetting net. This number has been very low for several years now and we are pleased to report that there were in fact zero upheld complaints in 2019. Our compliance managers play the key role here in the consistent and measured application of the ASAI code in vetting submissions. While most work they see is compliant, they did reject some 15% of submissions in 2019, a testament to their ongoing vigilance.

Speaking of non-compliance, one statistic that stands out is that almost one in three non-compliant submissions was rejected because of the absence of Responsibility Messaging (RM). This represents 5% of all submissions and we would encourage our users to re-double efforts to save their and our resources by ensuring RM is included in all submissions. We will continue to highlight this issue to our users through marketing communications, direct contact and training. Furthermore

we have updated our website so that our users are now actively reminded of the need for RM while making submissions.

Addressing the challenges around the proliferation of digital communication modes, 2019 saw the ASAI initiate an ongoing monitoring exercise to identify whether non-compliant work might be entering the market by by-passing CopyClear. This safety check is something we had engaged with our partners in the ASAI about in 2018 and we welcome their focus on this area. They are also following up with individual agencies and brand owners as required and we will continue to support them in this through our training programme and outreach.

Further collaboration with the Advertising Standards Authority for Ireland and our stakeholders in Drinks Ireland yielded clear guidance from the ASAI in relation to the treatment of non-alcoholic product variants (NAPV) of alcohol brands under the code. In line with global trends, this new category continues to grow in importance in the Irish market. Given the non-alcoholic nature of

the products, it was agreed that effective September 1st 2019, CopyClear would play no official role in the pre-vetting of NAPV marketing communications. While submission to CopyClear is therefore not required for such products, we continue to offer our services in an advisory capacity to any of our users who would like a second opinion. We are encouraged to report that many of our users are indeed continuing to avail of the advice of our compliance managers for NAPV communications.

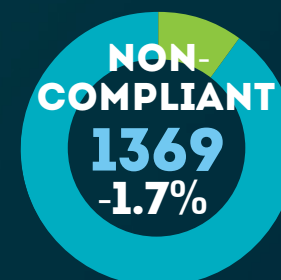
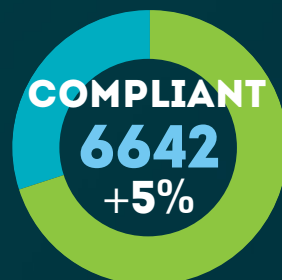
Operationally, 2019 saw a continued focus on ensuring our service remains consistent and approachable. We hosted our 8th User Seminar in the Charlemont Hilton Hotel which saw a tighter, more focused format than previous years. The seminar was very well attended with great engagement between our users and compliance managers as evidenced by the many questions from the floor. We have stepped up our communications to our users through direct outreach and ezines, as well as maintaining investment in improving the CopyClear website. Our experienced team of compliance managers



continue to provide an excellent service to our users, including meeting often amongst themselves to ensure consistency of decision making. As well as their main task of reviewing submissions, they remain available to provide additional training to individual companies or their agencies.

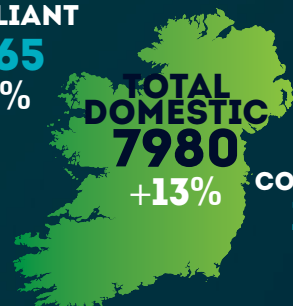
The marketing communications landscape in Ireland saw a big change in November when the use of cinema and OOH media was restricted by the implementation of the leading edge of the Public Health (Alcohol) Act which was passed in late 2018. The Act promises more restrictions in the future, especially in the area of marketing communications content, however we remain some way away from the full implementation of the Act, if indeed it is fully implemented. As we move forward into 2020, 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 users comply fully with the letter and spirit of that code. ■

**Brendan Coyle, Chairman.**



**2019 SUBMISSIONS**  
**TOTAL 9,061 +9%**

COMPLIANT  
**5865**  
 +9%



NON-COMPLIANT  
**1140**  
 +9%

COMPLIANT  
**777**  
 -5%



NON-COMPLIANT  
**229**  
 -34%

\*This data does not include non-valid nor incomplete submissions.

# 2019 Submissions

**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.



# Board of Directors



“Central Copy Clearance Ireland, trading as CopyClear, was established in 2003. It is a separate, independent company with its own board of directors, and is not a subsidiary of any other company or organisation.”



**Brendan Coyle**  
CEO of Parfumarija Ltd.  
Brendan is CEO of Parfumarija Ltd, a scent creation, marketing and retailing company

based in Dublin. He also manages a property investment business, investing both in Ireland and internationally. Brendan was a board director of Irish International BBDO where he spent 15 years before leaving the advertising business in 2013 to start Parfumarija. He is a graduate of Trinity College Dublin and the University of Cambridge. ■



**Charley Stoney**  
CEO, Institute of Advertising Practitioners of Ireland (IAPI).  
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. ■



**Cian Corbett**  
AIB Digital & Innovation Manager.  
Cian is a digital media strategist

and spent 6 years with Core developing digital strategies for Three, Toyota, Spar and Aviva. Prior to joining AIB, he was Managing Director of Leading Social – a content and social media agency. The Cork native's experience also includes two years business development with Diageo Ireland in Munster. ■



**Robyn O'Mara**  
Marketing Effectiveness Manager, ESB.  
Prior to ESB, Robyn spent 12

years as Marketing Communications Manager in the banking industry with First Active, Ulster Bank and finally 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 18-year career to date has been spent predominantly in marketing communications and now focuses on the strategic direction of marketing, effective creative and media planning. ■



**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 (IAPI) for six years. He has extensive experience in all matters to do with advertising having worked on many new product launches and on campaigns for most of Ireland's iconic brands. Barry has worked on the Agency and Client side of the business – he 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. ■



**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. ■



**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





### **Lynne Tracey**

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 DIT MSc in Advertising 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 M'Loughlin**

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. ■



### **Joe Clancy**

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. ■



### **Eoghan Nolan**

Award-winning copywriter Eoghan Nolan brings a wealth of experience to the role, having been Creative Director and Board Director of McCann, BBDO Dublin and Leo Burnett. A former lecturer in Copywriting in DIT, Eoghan served on the boards of IAPI and of ICAD and currently runs his own creative consultancy, Brand Artillery. Among his accolades are Ireland's first D&AD, Radio Ad of the Millennium from the Kinsale Sharks and Best Copywriting from the National Newspapers of Ireland. He won the only Gold Bell awarded for any advertising in Ireland at ICAD 2014. Since 2017, he has been a faculty member of Inseec U London, where he lectures on the Masters in International Brand Strategy course. Eoghan holds an advanced certificate from the Wine & Spirit Education Trust (WSET). ■

# Operational Overview

**C**opyClear 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 2019 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 2019, Copyclear reviewed 9,061 submissions. 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 9,061 submissions considered and assessed, 6,642 of them were compliant, an approval rate of 73%, with 1,369 (15%)

non-compliant. These figures compare with a 76% approval and 17% non-approval rate in 2018.

CopyClear considers submissions in all alcohol categories and reviews all marketing communications aimed at the Irish consumer, whether from Irish sources or originating from overseas.

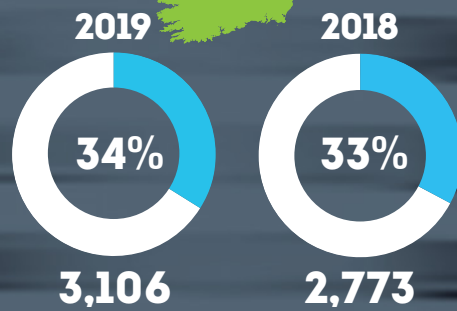
## CopyClear Remit

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

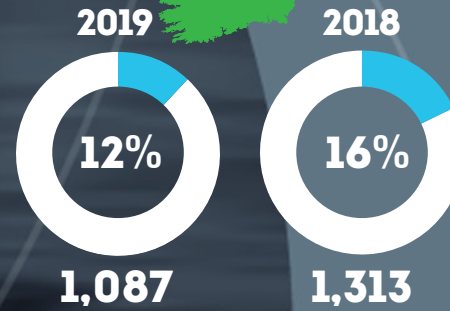
**“CopyClear compliance managers and general management met regularly during 2019 with representative bodies, brand owners and agencies to ensure understanding of the codes and how they are applied.”**



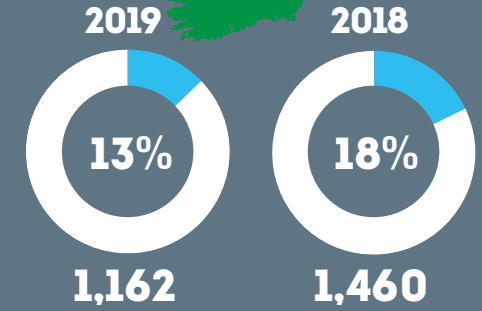
**IRISH-BASED  
ADVERTISING AGENCY**



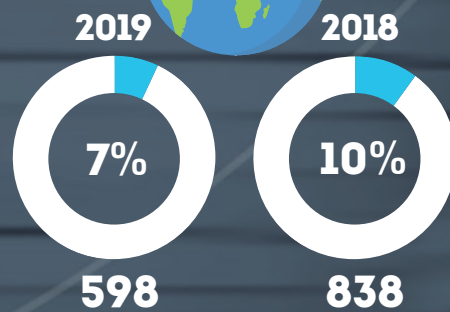
**IRISH-BASED  
MEDIA AGENCY**



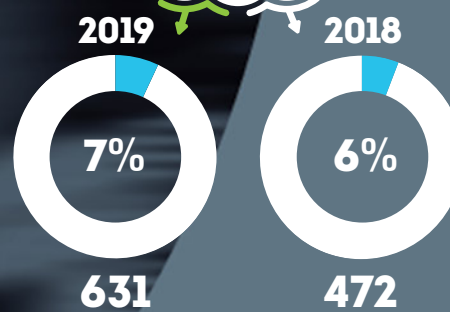
**IRISH-BASED  
DIGITAL AGENCY**



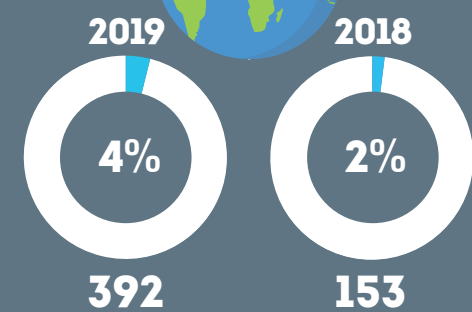
**OVERSEAS  
ADVERTISING AGENCY**

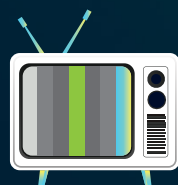


**BRAND  
OWNER**

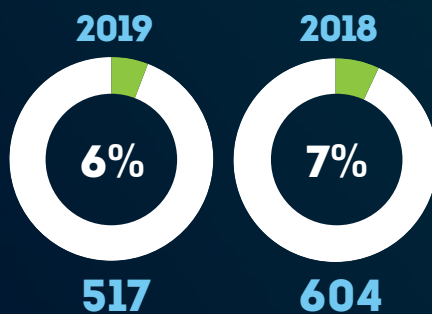


**OVERSEAS  
DIGITAL AGENCY**

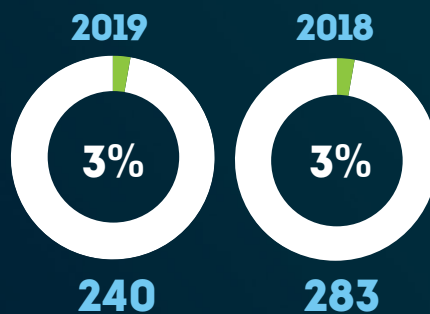




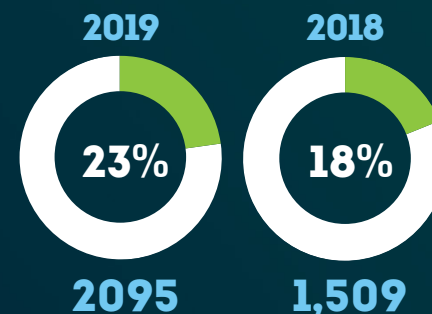
### TELEVISION



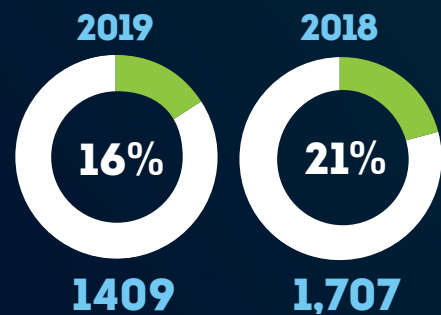
### RADIO



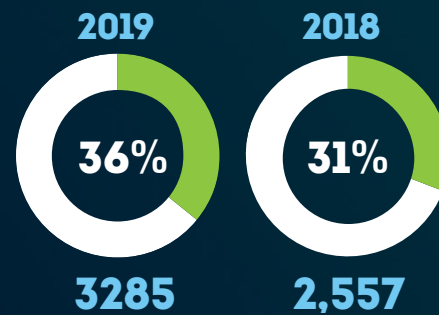
### OUT-OF-HOME



### OWNED ONLINE ACTIVATIONS



### PAID-FOR ONLINE ACTIVATIONS



**“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.”**

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 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 or broadcast media, it was vital to engage the support of these channels in implementing the CopyClear process. ■





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