



# CopyClear

ANNUAL REPORT 2015

## CHAIRMAN'S INTRODUCTION

**THE PAST YEAR** has been another busy one for CopyClear with demand for our service continuing to grow – albeit at a modest 9% increase in submissions received in 2015 compared with the 48% increase in the previous year. I'm glad to report that the vast majority of work submitted to our clearance managers in 2015 (94.4%) was compliant with the ASAI code.

We recently completed the third round of client satisfaction research among our users and, while the response rate is disappointingly low, the feedback continues to be very positive with 86% of respondents rating the service as good or excellent.

The work on bringing digital media into the CopyClear process continues. In July 2015 we hosted a dedicated seminar for digital publishers at which presentations from Carat and Diageo emphasised the importance of digital media participating fully in the CopyClear process.

In November 2015 we hosted our fourth users' seminar in Croke Park. It was very well attended and the feedback was overwhelmingly positive. On the same day we hosted our first ever seminar for media owners with a good turnout from this sector. We plan to build on this success with further seminars planned for later in 2016.

On March 1st 2016 the 7th edition of the ASAI Code came in to effect. To assist service users we published revised footnotes to the code on our website.

While our clearance managers continue to report very high levels of compliance with the code among alcohol advertisers, there is evidence that some advertisers are not working within the spirit of the code. This is a matter of significant concern for the board of CopyClear.

The number of consumer complaints upheld by the ASAI against alcohol advertising continues to be very low



**"While our clearance managers continue to report very high levels of compliance with the code among alcohol advertisers, there is evidence that some advertisers are not working within the spirit of the code"**

but, as I have been emphasising since I took on the role of CopyClear Chairman, it only takes one high-profile breach of the code to jeopardise the entire system of self-regulation currently enjoyed by the alcohol sector in this market. Indeed, the draft legislation, if enacted in its current form, would see the advertising of alcohol very significantly restricted.

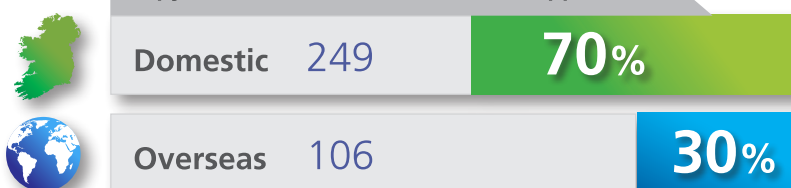
If the alcohol sector is to have any success in lobbying for amendments to the proposed legislation it will have to demonstrate that it can regulate itself in a responsible fashion – this means abiding not only to the letter of the codes they have signed up to but, more importantly, to the spirit of those codes.

At CopyClear we will continue to support our service users in achieving this.

### CopyClear Submissions in 2015 Approved



### CopyClear Submissions in 2015 Not Approved



FINTAN COONEY CHAIRMAN

## CHAIRMAN



### FINTAN COONEY

Fintan is a graduate of UCD and spent over 25 years working in advertising agencies including Dimension, McCann Erickson, Dublin and Chemistry where he was Client Service Director for 13 years.

He is a former board member of IAPI and sits on the board of the St James's Hospital Foundation.

Fintan left his career in advertising in 2012 and now works as a Funeral Director with Fanagans.



### 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 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.



### TANIA BANOTTI

CEO of the Institute of Advertising Practitioners of Ireland (IAP).

IAP is the representative body for the Irish marketing and communications sector. Members include creative advertising agencies, media agencies and digital specialists.

Previously Tania was CEO of Theatre Forum, the national association for the performing arts and one of the founders and Secretary of the national campaign for the Arts for three years. She was Chief Executive of Screen Producers Ireland, the national association for broadcast film and animation production companies. She also worked for the UN in the Gaza Strip, Palestine for a number of years.



### KIRSTEN LYONS

Head of Marketing Communications,  
Ulster Bank, part of the Royal Bank of Scotland.

Kirsten has 16 years' experience working in financial services marketing. She started her career with Bank of Ireland Group, where she held a variety of marketing roles. Currently, she is fortunate to lead a passionate team of marketing professionals in Dublin and Belfast. Kirsten is responsible for driving brand consideration and meaningful commercial returns from marketing communications including traditional and digital advertising, category support activity, while also identifying opportunities to leverage Ulster Bank's local presence nationally. In addition, she is responsible for increasing customer engagement through one to one communications and leading large customer communications required due to business change.



### ROBERT JORDAN

Head of Beverages and Innovation,  
Glanbia Consumer Foods.

Robert has over 16 years' experience working in FMCG marketing roles. He started his career with the Fosters Group in Australia, and spent four years working with Procter and Gamble - as a Business Manager on its sales & marketing team in Ireland. Since 2004 he has held various roles in Glanbia Consumer Foods, mostly related to marketing Avonmore milk, Ireland's No. 2 grocery brand. His current role also includes managing Glanbia's innovation pipeline, as well as the international launch of the Avonmore brand, across Asia and other markets. Robert has a B.Sc. in Management from Trinity College Dublin.



### CAROLINE DONNELLAN

Head of Marketing & Communications,  
KBC Bank, Ireland.

Caroline has over 13 years' experience in financial services and is currently Head of Marketing & Communications at KBC Bank Ireland. Caroline leads the Marketing and Communications team with responsibility for driving brand awareness and consideration of KBC in the Retail financial sector through the management of advertising, brand strategy, product communications and public relations.

Caroline joined KBC in 2012 from EBS where she held the position of Marketing Communications Manager. She had responsibility for managing the marketing & communications strategy for EBS and implementing a new customer engagement programme.



**RAY SHEERIN**

Managing Director, Chemistry

A graduate of French and Irish from Trinity College, Ray began his career in financial services in Dublin, moving to London four years later to become International Marketing Manager at Fidelity. He switched to agency life to become a Copywriter in London, working initially on Prudential Assurance and Prudential Home Loans, then moved into client service where again his financial services experience stood him in good stead and he ended up as Group Account Director while still in his 20s. Ray moved back to Dublin in 1991 to head up Equator, the Saatchi below-the-line subsidiary, then set up OgilvyOne in 1993, building it up to become the best known direct marketing agency in Ireland. In 1999, along with Creative Director, Mike Garner, he set up Chemistry. In addition to his management role, Ray works very closely with a number of clients on strategy.

**JIM CASSIDY**

Entrepreneur &amp; Digital Marketing Specialist

Jim co-founded Lucidity Digital in 2003. Under his leadership the company grew from an infrastructure and technology company to one of Ireland's leading full service digital agencies employing 30 people. He guided the business through the successful acquisition by Aegis Media in 2013 and a re-brand to Isobar in 2014 acting as Managing Director until May 2015. He is a lecturer in eCommerce, and Digital Strategy, and is passionate about giving Irish businesses a platform to operate on a global scale. He is currently working on an MBS from IMI/UCC in Data, Finance and Digital Strategy.





# CopyClear

## MANAGERS



**LYNNE TRACEY**

Lynne Tracey started out in the Advertising Industry in a salmon-colour linen suit and a black briefcase – well it was the 1980s and that's her excuse. Despite the sartorial lapse, Lynne managed to find work and spent her career working in Agencies such as Campaign Advertising and McCann-Erickson in New York. She moved back to Dublin as a founding Director of McCann-Erickson Dublin and subsequently moved to the Javelin Group where she was a Board Director. Lynne is a past President of IAPI and has served on the Board of the ASAI and CCCI. Lynne currently lectures on the DIT MSc in Advertising and has been a Clearance Manager with CCCI for seven years.



**MAGS McLOUGHLIN**

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. In 2004 she took a career break and completed a Master of Creative Writing in Queens University. She is working on her second novel.



**JOE CLANCY**

Joe spent 10 years in London following QPR and worked in advertising with Brunings and the Young & Rubicam Group to support this addiction. He returned to Ireland to rediscover his Munster Rugby roots and joined Hunter (Saatchi & Saatchi), later becoming MD at Bates and Red Cell, and then CEO of Young & Rubicam Dublin. He has managed campaigns for iconic brands such as Land Rover, Smirnoff, Baileys, Club Orange, Johnson & Johnson, Pfizer, Bayer and Zanussi, that have won awards at CLIO, NNI, ICAD, PAA and IAPI ADFX. His involvement in Munster's two Heineken Cup Final victories however was in a purely supportive role. He served on the Council of The Marketing Institute and is a former Board Member of Central Copy Clearance Ireland.



**EOGHAN NOLAN**

Award-winning copywriter Eoghan Nolan brings a wealth of experience to the role, having been Creative Director and Board Director of McCann, Irish International BBDO and Leo Burnett. A former lecturer in Copywriting, 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 2012 from the National Newspapers of Ireland.



# OPERATIONAL

**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.**

**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. This has resulted in very few complaints about alcohol advertising to the Advertising Standards Authority for Ireland since CCCI/CopyClear was established.

CopyClear clearance managers and general management met regularly during 2015 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-

## OVERVIEW



this helps ensure compliance in the work finally submitted and can help the creative and production process along the way.

In 2015, Copyclear reviewed 6,314 submissions, an increase of 9% over the 2014 submission numbers.

This total includes all versions of a campaign, including preliminary concepts, adaptations and finished work. The number of advertisements that eventually appear in print or broadcast is naturally lower than the number of submissions considered and comprised 70% of all submissions in 2015.



Of the 6,314 submissions considered and assessed, 5,959 of them were compliant, an approval rate of 94.4%, with 355 (5.6%) non-compliant and therefore not published or broadcast. These figures compare with a 93.2% approval and 6.8% non-approval rate in 2014. CopyClear considers submissions in all alcohol product categories – Beer and Cider, Spirits, Wine, Liqueurs and Ready to Drink (RTDs), and it reviews advertisements >>

# OPERATIONAL

## OVERVIEW



### Irish-Based Advertising Agency

2015	5,092	80% ↑
2014	4,297	74%

originating from overseas sources and from Irish sources.

In 2015, 81% of all submissions were created in Ireland, this represents an increase in locally produced material where 27% of material reviewed by CopyClear in 2014 was created outside of Ireland.

### PRODUCT CATEGORIES

CopyClear divides its analysis of alcohol submissions into different product categories, and this

approach helps to more precisely identify patterns and trends.

Beer accounted for 3,710, 58% of the total submissions. This was down from the 2014 figure when Beer accounted for 72% of the total submissions. The 2015 non-approval rate for Beer submissions was 5.5% compared to 7.5% in 2014.

Spirit advertisements accounted for 1,938 submissions (30%) of the total – this represents a massive

increase on previous years where the managers viewed 946 (16%) and 852 (22%) submissions respectively in 2014 and in 2013. The overall approval rate for Spirit advertisements in 2015 was 78% and 5.6% non-approval, and this compared with 68% and 5.4% respectively for 2014.

The total number of Wine advertisement submissions in 2015 was 228 compared to 238 in 2014 – the overall approval rate for Wine advertisements in 2015 was 60% compared to 73% in 2014.

Liqueurs only accounted for a total of 26 submissions in 2015 as compared to 33 in 2014. RTDs (Ready to Drink) showed a total of 8 submissions in 2015 with 75% of them being compliant. These advertisements were largely adaptations of international materials.

### SOURCE-ORIGINATION AND MEDIA CHANNELS

81% of the 6,314 advertising submissions originated in Ireland, amounting to 5,148 submissions. The comparable figure for 2014 was 4,465 – 73% of the total number of submissions. The advertisements originating from overseas-based companies and agencies tend to be part of wider global advertising campaigns for their brands. Overseas submissions amounted to 763 which compared to 1,040 in 2014, a decrease of 36%.

In 2015, Irish originated material accounted for 81% of all submissions compared to 2014, when Irish originated material comprised 73% of all submissions.



### Overseas Advertising Agency

2015	755	12% ↓
2014	940	16%



### Irish-Based Media Agency

2015	644	10.1% ↓
2014	778	13.4%



### Irish-Based Digital Agency

2015	1,631	25.6% ↑
2014	860	14.8%



Internet-based advertisements have been the number one media channel since 2011 – previous to this OOH had been the single largest medium. In 2015, paid-for on-line activations accounted for 16% of all submissions. Owned on-line activations accounted for 22.25% of all submissions. Press and magazine advertising accounted for 4.2% of all submissions. TV accounted for 9% and radio accounted for 4.8% of all submissions. Cinema as a channel for alcohol advertising is minimal at 0.3% of the total.

### SUMMARY

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 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 >>



#### Overseas Digital Agency

2015	18	0.28% ↑
2014	11	0.19%



#### Television

2015	598	9.4% ↑
2014	464	8.0%



# OPERATIONAL

## OVERVIEW



### Radio

2015	307	4.8% ↓
2014	353	6%

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.



### Out-of-Home

2015	1,575	25%
2014	1,423	25%

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.



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 press, outdoor or broadcast 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

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



### Paid-for Online Activations

2015	2,423	38% ↑
2014	1,950	30.6%

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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