

## **Cinema Advertising Association**

As a member of the Committee of Advertising Practice (CAP) the Cinema Advertising Association fully supports the proposed renewal of the co-regulatory arrangements for broadcast, ODPS and VSP advertising.

While advertising on a cinema screen falls under the non-broadcast CAP Code, the present co-regulatory arrangement has worked satisfactorily and efficiently over the past ten years. Cinemas screen a great deal of advertising material primarily designed for television and therefore subject to the BCAP Code. The CAP and BCAP Codes have continued to become more closely aligned over the years, but having a single body responsible for overseeing the adherence to these codes in both broadcast and non-broadcast media ensures a consistency in advertising standards. This helps ensure the expectations of advertisers and the public as to what is permissible and may be encountered in advertising across all media. It also enables a one-stop-shop for the public to which they may address concerns regarding advertising carried by any medium.

As a practical benefit to the CAA, the current co-regulatory system means that any commercial acceptable on television is generally acceptable for cinema. Only the methods of ensuring age-related appropriateness fundamentally differ between cinema and television, there being no watershed on cinema and no legally enforceable age-related restrictions on television viewing for minors.

When it comes to investigations into infringements of the Codes, the fact that a single body, the ASA, can adjudicate on both broadcast and non-broadcast advertising upholds a consistency of interpretation and application between BCAP and CAP codes. It also means that guidance to advertisers, regularly issued by the ASA, is coherence and consistent between broadcast and non-broadcast media.

The CAA notes the non-substantive changes in the agreement, made for practical and legal updating reasons, and sees no reason to question their appropriateness. By maintaining the current co-regulatory arrangement for broadcast, ODPS and VSP advertising with the ASA acting frontline regulator on Ofcom's behalf with Ofcom as the legal backstop, a level playing field of advertising regulation will be well assured across all advertising media.