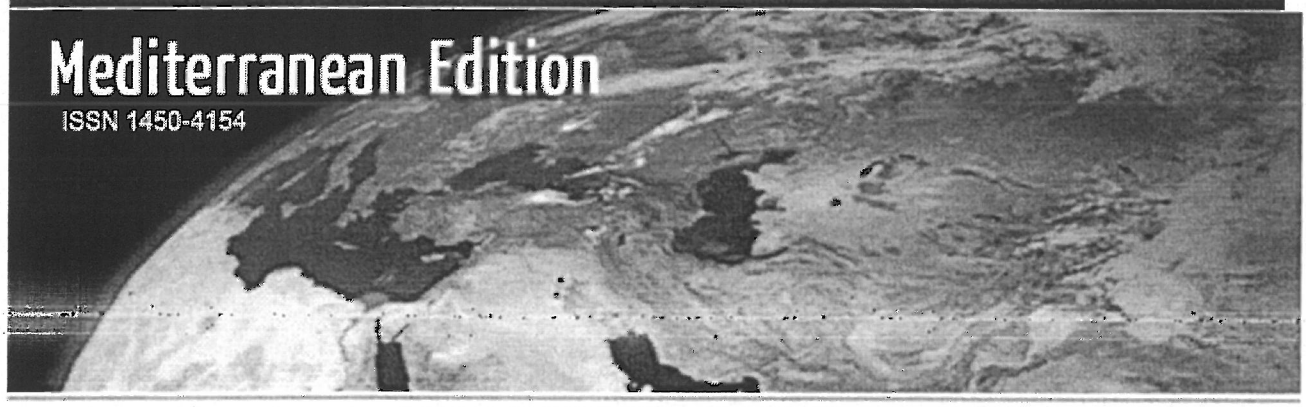
The Global Network of Communication Scholars

Mediterranean Edition

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Menu

Home
Current Issue
Future Issues and Calls
Submission Guidelines
Advisory Board
Journal Editor
Book Reviews
Graduate Research
Archive

Additional Resources

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Global Media Monitor

Global/Local Media in Local/Global Spaces (Spring 2009)

The first article in this spring 2009 issue is **Gabriel Moreno**'s "Viewing Globalization in Transnational, Mexican American Spaces". Moreno engages theories of reception in order to challenge perspectives that see immigrant communities as solely concerned with news and information related to their places of origin. Through the analysis of personal diaries of Mexican-origin participants and their television news consumption, Moreno suggests that future research should reject the positivist approaches that situate non-native audiences as caught between "sending and receiving" societies. Drawing out the implications from the research, Moreno argues that immigrant communities have complex and multiple identities that "go far beyond the 'here/there' frames of understanding traditionally employed for audience research of immigrant groups". The article calls for a reconceptualization of reception analysis in order to accommodate a deeper understanding of 'transnational social spaces inhabited by immigrant communities'. **The second article** is **Amani Ismail** and **Dan Berkowitz'** comparative analysis of leading U.S. and Chinese daily newspapers where they consider the role played by different press systems in the coverage of terrorism. Using examples from the *New York Times* and *China Daily*, Ismail and Berkowitz convincingly argue that the mainstream news media tend to stay close to the official government perspective on terrorism across press systems. Using an interpretive approach, the study highlights the centrality of the concept "terrorism" in newspaper articles, the attribution assigned, the specific events that were categorized as terrorist, and the demographic descriptions assigned to the perpetrators. The article concludes with consideration over the similarities and differences associated with the two press systems' approaches to terrorism. **In the third article, Merih Taşkaya** draws upon a content analysis of official reports evaluating "surreptitious advertising" (advertiser's use of media beyond the legally allotted space and time) in Turkey, to evaluate current trends in the Turkish advertising industry in the light of the implementation of neo-liberal policy reforms. Taşkaya sees an increasing threat to the public interest as advertising encroaches increasingly upon media content with new and

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Aim and Scope

The *Mediterranean Edition* publishes scholarship with a focus on **communication and media studies from critical and cultural perspectives, gender studies, media and peace communication, and studies in the role of communication and the media in the resolution of conflict and the promotion of peace**. The journal especially welcomes articles from feminist theoretical perspectives, political economy of communication, studies in communication policy and regulation, studies in communication and peace, peace journalism, conflict studies, film studies, democratic media studies, audience studies, studies in media and ethnicity, and discourse studies. The *Mediterranean Edition* accepts manuscripts for consideration throughout the year and publishes in both Spring and Fall.

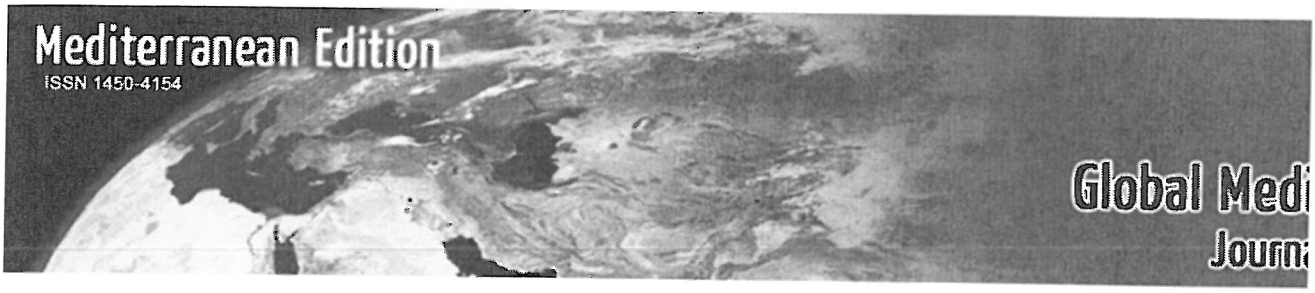
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search...

Home
Current Issue
Future Issues and Calls
Submission Guidlines
Advisory Board
Journal Editor
Graduate Research
Archive

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Sectoral Distribution of Surreptitious Advertising in the Process of Neo-Liberalism in Turkey

Merih Taskaya

Abstract
This study evaluates surreptitious advertising in the Turkish media by focusing on neo-liberal policies. Surreptitious advertising is defined as "the introduction of products, services, commercial brands or activities of a producer or service supplier in television and radio programs, newspapers, magazines, and movies, outside the advertisement time band and area." The data were gathered through a content analysis of audits, verdicts and other official reports dealing with surreptitious advertising. The present quantitative state of surreptitious advertising applications in any sector has been investigated by considering the damage caused by neo-liberalism. The results show that the level of surreptitious advertising is very high in sectors subjected to advertisement restrictions.

Key Words: Surreptitious advertising, Advertising restrictions, Neo-liberalism, Deregulation

Introduction

As in many other countries, the regulations covering advertising practices in Turkey control the presentation of advertisements in a variety of mass media through the basic separation principle. That is: advertising messages may not be included in editorial programs or news stories. Media consumers, program-makers and journalists must be protected from commercial excesses. The legal provisions relating to radio, television and newspapers, therefore, specify that the beginning and end of an advertising slot must be separated from the program or news story by a clear visual or audible marker. This is known as the "separation principle". Furthermore, the obligation to use specific signs or symbols has been introduced in order to make it clear that something is an advertisement. Although legally forbidden, surreptitious advertising is used frequently on radio and television, in movies, and in newspapers and magazines in Turkey.

The separation between advertising and programs is not always given the necessary attention. It can happen that advertising messages are hidden inside programs – "surreptitious advertising" – or that objects and props are placed in a program in order to achieve an advertising effect – "product placement[1]". While product placement may be allowed in certain circumstances, for example when it fits within the dramatization of a program and is clearly declared as sponsorship, by contrast surreptitious advertising is always illegal.

One of the fundamental principles of the advertisement law is that an advertisement should be explicitly presented as an advertisement in order to be legally acceptable. Regulations regarding surreptitious advertising in Turkey are unequivocal:

- Article 16 paragraph 2 of the *Consumer Law* No. 4077 states that "Surreptitious advertising is prohibited".
- Article 21/5 of the *Law on the Foundation and Broadcast of Radio and Television* No. 5785 states that "Surreptitious advertising is not allowed in any broadcast".
- Article 5, paragraph (d) of the Commercial Advertising Regulation states that "A broadcast advertisement should be clear and understandable regardless of its broadcasting media. . . . Surreptitious advertising is prohibited".
- Article 14 of the Regulation on the Principles and Procedures of Radio and Television Broadcasting ("RTUK Regulation") states that "Unless clearly indicated as an 'advertisement', products or services should not be presented in programs with the intention of advertising".

In Turkish legislation, the definition of surreptitious advertising is only found in Article 4 of the RTUK Regulation: "Surreptitious advertising connotes the representation in words, in pictures, by logo, by corporate name or by registered trade mark, hinting allusively with a purpose to advertise the products, name, trademark or the activities of a producer of goods or a provider of services in programs by the broadcaster in return for payment or for similar consideration." In this study, surreptitious advertising is defined as the introduction of the products, services, commercial brands or the activities of the producer or service supplier in television and radio programs, in newspaper and magazine articles, and in movies outside the advertisement space and time band, by means of logo, commercial title, trademark, visual or verbal discourse or implications hinting to them (Taşkaya, 2008). Also, while other studies have used the term "apparent advertisement" to refer to conventional advertising and distinguish it from surreptitious advertising, (see Avşar and Elden, 2004, p. 43) this study uses the term

"conventional advertisement" to avoid the possible comparison of "apparent" and "unapparent" inherent in the former.

As a result of Neo-liberal economic policies and the model of an open economy, the national market has been opened to foreign capital in Turkey and multi-national companies and their advertisers have moved in. Foreign agencies have become partners with Turkish agencies by buying 51% of their shares (Çetinkaya, 1993, p. 47). Thus, the period of multi-national corporations advertising in Turkey has begun. With the development of international publishing, international principles have been taken into consideration in writing the law regulating the broadcasting field.

The source of national legislation for television broadcasting in Turkey is the *European Convention on Trans-frontier Television* provided by the European Council. The *RTUK Act* No. 3984, and the *Consumer Protection Act* No. 4077 were also written within the framework of the Convention. The regulation of the sponsorship of products and services within the restrictions on advertising is described in the Convention as follows "the aim is to prevent any profit from indirect advertisement of products and services by means of sponsorship." However, advertising restrictions are seen as a violation of the "freedom of commercial expression" in neo-liberal discourses (see Gray, 1997).

With regard to the legal sanctions against the use of surreptitious advertising, in line with Article 16 of the Advertisement Board Regulation, the Advertisement Board is entitled to punish anyone who is in breach of Article 16 of the Consumer Law, to temporarily stop the challenged advertisements as a precaution, and/or demand the amendment of the challenged advertisement, and/or impose monetary fines. In addition, in line with RTUK Regulations, RTUK, as the governmental controlling authority for radio and television broadcasts throughout Turkey, is entitled to impose on anyone who does not comply with the broadcasting principles set forth in the relevant regulations sanctions such as the publication of an apology, prevention of the broadcast of a radio or TV channel broadcast, cancellation of permission to broadcast, as well as the imposition of a monetary fine.

Violations of the content-advertisement separation principle in the media are not seen solely in television programs. They can also be observed in newspapers, magazines and movies, which are also included in the research area of this study. Commercial expressions presented as visual and verbal discourses in television programs, or in newspaper or magazine articles should generally be assessed within the scope of surreptitious advertising. The major support for this evaluation is that such presentations are realized beyond the advertising space and time band.

- The medical products sector, growing globally, is in search of new advertising areas to announce new products and services. The *European Convention on Trans-frontier Television* has strict rules dealing with the advertisement of medical products: "Advertising for medicines and medical treatment which are only available on medical prescription shall not be allowed." *The Turkish Law on the Establishment of Radio and Television Enterprises and Their Broadcasts* also has some restrictions on broadcasting advertisements for the health sector: "Advertisements for medicines and medical treatment which are only available on prescription shall not be allowed. Advertisements for other medicines and medical treatment shall be composed of elements that are honest, truthful and subject to verification, and shall comply with the requirement to protect the individual from harm" (Article 22). Moreover, "Surreptitious advertising shall not be allowed in any broadcast" (Article 21). Despite such regulations, advertising violations can be observed frequently in the health sector in Turkey. When these violations emerge as surreptitious advertising, they must be evaluated as attempts to evade advertising restrictions.

- According to the *Law on the Establishment of Radio and Television Enterprises and Their Broadcasts*, "Advertisements for alcohol or tobacco products shall not be allowed" (Article 22). On the other hand, alcohol advertisements are allowed in print media on condition that they comply with the "Principles for Alcoholic Beverage Advertisements" as defined by the Turkish Ministry of Industry and Trade. Tobacco advertisements are absolutely banned. Furthermore, the *Framework Convention on Tobacco Control* was signed by Turkey on April 28th 2004 in New York. According to Article 13 of this Convention, "Each Party shall, in accordance with its constitution or constitutional principles, undertake a comprehensive ban of all tobacco advertising, promotion and sponsorship".

- Despite these regulations, the tobacco and alcohol sectors have been trying to bypass the bans on tobacco and alcohol advertisement, promotion and sponsorship. As an illustration, the Advertisers Association filed a lawsuit requesting the abolition of Article 19 of the Domestic and International Trade of Alcohol and Alcoholic Beverages Regulation (6 June 2003). The Council of State rejected this lawsuit in the public interest.

- According to the Turkish Private Education Institution Law, private schools and courses can advertise in the printed media, but cannot advertise by means of TV commercials.

There is more than one reason for the practices of surreptitious advertising despite restrictions. The zapping of channels or skipping of pages by the audience decreases the visibility of advertisements. By definition, advertisements are located in a limited time and space.

Surreptitious advertising is as old as the media it uses but it has been used rather more frequently by producers and marketers for profit during the neo-liberal process in Turkey. The first regulation of advertising was initiated with the *TRT*[2] *Act* No. 2954 in Turkey in 1983. Until the mid-1990's, compliance with the principle of separation in TV and radio broadcasts was controlled by TRT, with strict adherence to the principles of public broadcasting. The first private television station in Turkey was established in 1989. In the 1990s, the number of private television and radio stations has increased rapidly. Nevertheless, until 1994, no specific legal regulations in the field of publishing had been laid down. Although the RTUK Act was established in 1994, there was no control over compliance with the law until 1998. Until this date RTUK's interested was in collecting ad shares and 1998 was the first time RTUK reviewed advertising publications. As a result of this review, surreptitious advertisements were found in addition to many other advertising violations. Review reports do not contain detailed information. Information about where, when and how the first application of surreptitious advertising occurred in Turkey does not exist.

In the meantime, neo-liberal policies were being implemented in Turkey in the form of deregulation projects (Pekman, 2001). The neo-liberal free market approach has spread through the media field as it has done in many other fields of industry. Throughout the current neo-liberal period in Turkey the media has begun testing the rules, and what were once prominent lines demarking the nature of media products has become blurred. Many visual and audio elements associated with advertisements have begun appearing in News programs, soap operas, newspapers and magazines.

As agents of the manipulation of consumption, media companies play an active role in widening advertising's time and space. Consequently, consumers are being exposed to advertisements in spaces and time bands previously not allocated for advertising. This may happen, for instance, in television serials and news broadcasts. The use of a product by the hero of a popular serial may positively affect audience perceptions of the product as they perceive the hero as a role model (McQuail and Windahl, 1993). Berman (1987, p. 9) argues that audiences are cued by characters in television programs and thus particular values and ideologies are reproduced by means of such references. Although there is no clear evidence, it is also claimed that surreptitious advertisements can be more persuasive than those in the advertising time band; if the receiver sees the product coincidentally, it increases the effectiveness of the persuasion more than a direct manipulation (Yüksel, 1994). According to this argument, surreptitious advertising increases positive perceptions about products.

Surreptitious advertising is within similarly abstruse borders as program support and product placement applications. It is known that the violations which occur, particularly during the program support applications, frequently lead to surreptitious advertising. Furthermore, the expression 'product placement' which is used in the broadcasting sector in Turkey as professional jargon, often violates the content-advertisement separation principle and should be regarded as surreptitious advertising due to such violations.

There is neither a separate regulation nor a clause in the law dealing with product placement in Turkey. Product placement is defined as the practice of placing brands in a television program or in a movie as a form of advertising, as if they were a natural part of the scenario of the program.[2] According to Gupta and Gould (1997), product placement in movies expresses the transformation of the brand shown in the movie to money or another promotional context. This type of product placement has a hybrid property between advertisement and presentation.

The business world usually declares that the state restricts their freedom of commercial expression and argues against those criticizing violations of the content-advertisement separation principle in communication practices. This argument is based on liberalism. Three types of liberalism have emerged within the historical process: classical liberalism, social liberalism and neo-liberalism (Gül, 2004, p. 1). Neo-liberalism can be defined as a 'new' type of liberalism attempting to introduce its own alternatives and to provide a sustained critique of the development of liberalism in the period between the 1870's and 1970's (particularly between 1930 and 1970). Liberalization, privatization and deregulation policies within the framework of neo-liberalism have been in practice since the 1980's, together with associated international and national economic policies (Başaran, 2000, p. 39). According to Köker (1998), while some researchers explain the re-arranged rules of the state and the elimination of the mechanism producing them through the term "privatization", others prefer the term "deregulation". The process of deregulation has prepared the necessary grounds for surreptitious advertising.

Neo-liberal policies were adopted in Turkey through the use of military power with the support of the IMF in the stabilization package programs of January 24th 1980, and the deregulation process which was widely accepted during the Özal government has now started in Turkey (Kazancı, 2006 and Gül, 2004). This new

strategy is intended to open the economy to the outside. According to Başkaya "The process of opening to outside market forces which was carried out based on the January 24th 1980 decision was a start towards this goal, and additional measures will support new strategies" (Başkaya, 1986, pp. 188 – 189). The World Bank and the IMF proposed neo-liberal economic policies to Turkey as necessary applications for a new capital accumulation regime (Başkaya, 1986). In opening the economy to the outside, the free market economy has been adopted and, as a result, state intervention is reduced in many areas. The rules are beginning to lean in favor of free entrepreneurs in the process of deregulation.

Beginning in the mid-1980s, restrictive media regulations were gradually eliminated and as a result, the determinants of communication policy have taken on an economic quality rather than a cultural one. Ultimately, the public interest concept was replaced by corporate interests (Çaplı, 2002, pp. 45 – 47).

During the neo-liberal deregulation process, the necessary ground has been prepared on which to increase the space/time and impact of advertisements in the media sphere regarding the violation of the program/newspaper copy content-advertisement separation principle. Neo-liberal policies whose global reverberations have been felt in Turkey since the mid-1970s – and which have been enacted since the 1980's – have also been felt in the media field.

During the deregulation period policies were aimed at profit-oriented broadcasting institution and program and advertisement penetration, and a broadcasting environment has been established that eliminates ethical values in favor of profit-oriented broadcasting. This minimizes the borders between programs and advertisements and thus provides for maximum profit by opening up a new and more effective advertisement area to would-be advertisers.

There are some general indicators of the establishment of surreptitious advertisement. One of the criteria to be taken into consideration is the disproportionality between the information, images or language used for the purpose of advertising and the nature of the broadcast program or news. Four general criteria for surreptitious advertising are listed below.

1. Focusing on brand and showing the product for a long period
2. Showing the brand name in close-up
3. Presenting the product as disconnected from the context
4. Products that contain visual or verbal expressions of praise (Taşkaya, 2008).

Surreptitious advertisement practices occur in several ways in Turkey. The most frequent forms of hidden advertising are product placement and advertisements under the cover of news. The following scenario provides an example of surreptitious advertising: An insurance policy is shown with its name brand facing up on a table in the TV serial "Asmalı Konak". As the policy sits in full view, the actors discuss issues related to insurance.

Theoretical framework

The main aim of this study is to analyze the sectoral distribution of surreptitious advertising in Turkey, and to evaluate this within the context of the deregulation process of neo-liberal policies. This study has focused on sectoral distribution because the sectors subjected to advertising restrictions are included in the ad pie with surreptitious advertising. This process is not independent of the deregulation process of neo-liberal policies.

In order to explain the state of surreptitious advertising in Turkey its economic and political background must be considered. Thus, the evaluations of this study need to be done within the context of neo-liberal policies whose first and sole aim is company profit (McChesney, 2003, p. 7 – 8). The effect of neo-liberal policies can be seen in their influence on the media in terms of the regulations on private channels – the number of which rose sharply in the 1990's. This study therefore explores the sectoral distribution of surreptitious advertising in Turkey by concentrating on deregulation projects.

In the free market perspective, great hopes were placed on advertising as a means of increasing consumption. Efforts towards deregulation have been tilted towards making the content-advertisement separation principle flexible because of attempts by capitalists, who want to transform all public spheres into an advertising area and by the owners of the media institutions, who want to increase their share of the advertisement pie.

The reciprocal determinism between production and consumption requires the inclusion of approaches related to consumption. Analyses of the attitudes directed by desire, which are seen as the main pillar of the Veblenist critique of Western consumption societies, cede their place to the demand manipulation approach of Galbraith (1972). According to him, it is the advertisement activity which is effective in the emergence of demand, and which separates it from the satisfaction of real necessity rather than the free choice of the consumer. The "desire of the

consuming mass to look like others" is used in a variety of strategies by means of media products within the advertisement activity. According to Kellner (1992), consumption includes the meaning of consuming opinions, and appearances on television and in advertisements as a whole. Symbolic meanings influence modern consumers while they are buying goods such as clothes, cars, and furniture. The goods which are bought are not only material objects which have simple, direct and pragmatic uses, but are also, at the same time, objects used by the consumers to exhibit who they are. Consumption goods are part of a method with which the identity senses of individuals are formed through the use of symbols in the consumption forms (Bocock, 1993). The use of specific goods by the hero in television serials, and product recommendations by newscasters are some examples of such strategies (see Baudrillard, 1998, p. 195). While the consumption rate of goods and services is increased by such strategies, many media products are produced more cheaply because of sponsor company support. Although such strategies are not systematic, they become income sources which feed media industries.

The emergence of surreptitious advertisements must be sought in the history of advertisement rather than in the history of neo-liberal policies. Pekman (2001) highlights the periodic parallelism between advertisement history and surreptitious advertisement history. As the border between news and advertisements became blurred, which is a significant characteristic of current broadcasting, surreptitious advertizing emerged with the invention of the printing-press in the 15th century, and later the first newspapers in the 17th century (Pekman, 2001, p. 206).

While analyzing the sectoral distribution of surreptitious advertizing as a good, it is essential to concentrate on whole economic policies in order to see its nature and ideological function. Neo-liberal economic policies have been a focus of attention here precisely to relate the sectoral distribution of surreptitious advertisement to macro-economic dynamics, and to the wider structures on which they are based.

Research Questions

- What is the current quantitative situation of the sectoral distribution of surreptitious advertising in Turkey?
- According to a variety of sectors in Turkey, what is the content distribution of programs including surreptitious advertisements?

Method

This study has employed content analysis to examine meeting reports and press statements from the Advertising Council which evaluated surreptitious advertising taking place on television, in movies, newspapers and magazines between 2000 and 2005, and the verdicts of the Administrative Court based on the Advertising Council's decisions. Initially, files dealing with 1240 advertisement violation cases in 68 meeting reports of the Advertising Council between 2000 and 2005 were examined in order to explore sectoral distribution of surreptitious advertising in Turkey. 201 surreptitious advertising cases included in those files were taken as data and were analyzed.

Since it was impossible to assess all the surreptitious advertisements broadcast or published between the years stated above, only those declared as violation cases by the audit mechanisms were studied. Stay of execution cases filed in the Administrative Court against the Advertising Council, and all the counter claim verdicts filed by such Commissions were excluded as they were still pending. Thus these cases were not included in the sampling.

Findings

Sectoral Distribution of Surreptitious Advertising

The amount of surreptitious advertising analyzed in this research was a result of the Advertising Council controls based on Article 16 of Act No. 4077. Among the advertisements examined by the Council, one out of five cases was considered to be a violation of the surreptitious advertising ban (Taşkaya, 2008). This study has found that the products and services promoted by surreptitious advertising which were examined by the Advertising Council were concentrated in specific sectors. The sectoral distribution of surreptitious advertisements is presented in Table 1 below, in order of the number of occurrences.

Table 1: Sectoral distribution of the surreptitious advertising cases resolved by the Advertising Council between 2000 and 2005*

Sectors	n	%
Health	59	33,9
Food	22	12,6
Tobacco/alcohol	19	10,9
Communications	13	7,5
Consumer durables	12	6,9
Education	9	5,2
Automobiles	9	5,2
Cosmetics	8	4,6
Others	23	13,2
Total	**174**	**100**

* There was more than one case in one file, the number of cases (174) analyzed in this study is higher than the number of reports (68)

According to this table, surreptitious advertising is mostly practiced in the Health sector. The Food sector ranks second, followed by the Tobacco/Alcohol sector. The Education sector, which has advertising restrictions, is in sixth place. As can be observed from this table, surreptitious advertising is mostly practiced in sectors with an advertising restriction, with a total of 50% of the cases (Health: 33.9%, Tobacco/alcohol: 10.9%, Education: 5.2%). This justifies the hypothesis that surreptitious advertisements are seen more often in the product and service sectors with advertisement restrictions. This high rate shows that the sectors with advertisement restrictions are vigorously seeking alternative avenues for advertizing.

Tobacco companies that have been showing a tendency to use sponsorship as a result of the ban on advertising are conducting social responsibility projects for similar reasons. Any discourse used in the presentation of such activities is prepared skillfully to avoid detection and questioning. Radford (2004) stresses that such discourses, prepared for a variety of social responsibility campaigns, underline an insight: "Philip Morris not only performs charity work, but also creates a perception such as a recapture of respect for the elderly or a new dream for a battered woman" (p. 41). Radford claims that it is difficult to deal with such sensitivity and gives some examples which stress that clear paradoxes are avoided. Such advertisements do not point out the loss of self-esteem of the elderly who have been diagnosed with emphysema due to long-term cigarette smoking and are trapped in hospital beds, connected to oxygen tubes and have thus lost their independence.

Research shows that alcohol plays a very important role in domestic violence and sexual harassment within couples: "Dr. Brian Quigley affirms that 'alcohol itself does not lead to violence, but it is the cue for a possible violent act'. Who, then, do we see among the Philip Morris 'family' fighting severely against domestic violence? Miller, the second largest beer manufacturer in the U.S.A." (Radford, 2004, p. 41). Galbraith underlines this point, "engines of mass communication push for more beer but not more schools" (Buğra, 2000, p. 42). In addition, a historical event described by Bertrand (2000 [see also Foerstel, 1998, p. 36 and pp. 96-98]) also shows the fairness of this concern:

> More serious still: as far back as the 1930s, the US Federal Trade Commission published reports linking tobacco with fatal ailments. Yet until the 1960s, the media kept silent about the dangers of cigarettes. As late as the 1990s, major U.S. magazines refused the ads of a firm which was launching a campaign for its anti-smoking products. (p. 77)

Arguing that tobacco and alcohol product restrictions and bans prevent freedom of commercial expression, Gray (1997, p. 32) attempts to find support for his own liberal stand against those restrictions. He declares that policies restricting or banning the advertisement of alcohol and tobacco products are not different from policies banning the supply of such products. Furthermore, according to Gray, such restrictions have always overlapped with Mill's arguments regarding freedom of expression. Gray argues that policies restricting or banning tobacco and alcohol product advertisements contribute to the collectivization of responsibility and decision-making, which then limits individual freedom to a great extent. He expresses the belief that due to restrictions on the consumption of tobacco and alcohol products, the responsibility for health problems that the individual will face is taken away from the individual and is given to the state. These discourses by market liberals such as Gray about screening individual freedom are the reflections of attempts to destroy legal barriers against the pure profit-oriented mechanisms of the market.

Most broadcasts which include surreptitious advertisements for institutions providing educational activities are programs in which the answers to the questions in the University Entrance Exam are discussed, or university choices are debated. Surreptitious advertising of educational products and services is finding a space in the process of the commercialization of education by any means available. Alaaddin Dinçer, the president of a trade union working in the field of education, Eğitim-Sen, announces that "neo-liberalism is a key concept to understand privatization in education". He adds:

> Neo-liberals, who argue that 'Markets perform perfectly unless there is intervention' claim that education, a privilege, should be privatized now . . . This abolition plan, described as 'public reform' by the neo-liberal bureaucrats, was put into practice in Turkey after the 1980 coup in particular. The intervention in the national education system has become more significant since the 1990's . . . With the abolition of free education it is left to the market and capitalist groups who see education as a profitable sector (Dinçer, 2006).

Because of this challenge, advertizing was considered necessary in order for the education sector to be profitable, as is the case in any trade activity focusing on its own interest. For the same reasons, restrictions on advertisements for education are being evaded by means of surreptitious advertisements.

Table 2: Content of Program/Text distribution of surreptitious advertising in different sectors between 2000 and 2005

Sectors		Content							
		Serials	Health	Magazine	News	Sport	Education	Other	Total
Health	n	2	39	15	2		1		59
	%	3,4	66,1	25,4	3,4		1,7		100
Food	n	5	2	13		2			22
	%	22,7	9,1	59,1		9,1			100
Tobacco/ Alcohol	n	7			1	7		4	19
	%	36,8			5,3	36,8		21,1	100
Communications	n	6		3		4			13
	%	46,2		23,1		30,8			100
Consumer Durables	n	2		5	1	3		1	12
	%	16,7		41,7	8,3	25,0		8,3	100
Education	n						9		9
	%						100		100
Automobiles	n	2				7			9
	%	22,2				77,8			100
Cosmetics	n		2	5		1			8
	%		25	62,5		12,5			100
Others	n	6		10	3	4			23
	%	26,1		43,5	13,0	17,4			100
Total	n	**30**	**43**	**51**	**7**	**28**	**10**	**5**	**174**
	%	**17,2**	**24,7**	**29,3**	**4,0**	**16,1**	**5,7**	**2,9**	**100**

Table 2 presents the distribution of cases of surreptitious advertisement per sector and per subject. According to this Table, most surreptitious advertising is found in magazine programs and tabloid magazines. This is the expected outcome, as magazine program content and tabloid magazines are suitable for surreptitious advertising publications. Famous clothing brands and cosmetic products are presented in magazine programs and tabloid magazines through famous people, sometimes in a fashion show and sometimes during interviews. Store opening news is also often run in magazine programs and tabloid magazines.

Many brand names are presented at these openings. From time to time laudatory speeches are made for the brands in magazine programs. Cookery programs are part of magazine programs and, as seen in the table above, most food products are advertised surreptitiously in magazine programs. According to the findings of this research, most surreptitious advertising for cell phones and GSM operators is made for TV serials.

This shows that the programs or contexts in which food sector products and services are advertised surreptitiously are magazine-entertainment, and surreptitious advertisements are commonly inserted into cookery

programs. It is significant that products and services in the health sector are mostly advertised surreptitiously in health programs, and products and services in the education sector are mostly advertised surreptitiously in education programs. The reason for the presentation of tobacco and alcohol products in sports programs is that sports competitions are supported by sponsorships, especially motor racing.

Elif Görgü (2003) investigated the reasons for the organization of a Formula 1 race in Turkey, which was accused by the Advertising Commission of broadcasting surreptitious advertising for tobacco and alcohol products. She declares that Max Mosely, the president of the International Automobile Federation, had announced on September 13th 2002 that Formula 1 races could not be held in countries where there was a ban on tobacco advertisement. Furthermore, she maintains that although there has been a ban on cigarette advertisements since 1996, the decision to organize the race in Istanbul suggests attempts to bring about the abolition of this ban in Turkey. In her study, Görgü gave a list of examples of regulations aiming at abolishing the advertisement bans on tobacco products. She evaluates statements by Bernie Ecclestone, the owner of Formula 1, who announced that he would withdraw races which were to be held in Canada, where there is a ban on tobacco products, if they were organized without advertisements. She stresses that the tobacco advertisement ban has been discussed in the Canadian Parliament. Other examples where there are bans on tobacco advertisements are Belgium, where the government allows the organizers of the races to advertise tobacco, Shanghai, where the ban on cigarettes was violated because of the races, followed by widespread tobacco advertising in China and finally Bahrain, which declared that during the races tobacco advertisements would be allowed (Görgü, 2003). Prof. Dr. Elif Dağlı from Istanbul University, the coordinator of the National Tobacco and Health Commission, points out another fact: "cigarette consumption rose 50% between 1986 and 1996, during which period there was no ban on cigarette advertisement. The sponsorship of cigarette manufacturers, worth millions of dollars, is not aimless" (Görgü, 2003; see also De Beyer and Waverley-Brigden, 2003).

The frequency of distribution of surreptitious advertising for private schools and courses is lower than for the health sector and tobacco and alcohol products. Like all commercial enterprises focusing on profit, the private education sector also sees advertising and publicity as an indispensable activity. However, the legal limitations on these activities are surpassed by the application of surreptitious advertising.

Conclusion

This study has highlighted the fact that the sectoral distribution of surreptitious advertisings is more frequent in the sectors with an advertisement restriction. In the frequency ranking of the products and services with an advertisement restriction within the control of the Advertisement Commission, three sectors out of the first six are those with an advertisement restriction. As is mentioned in the "findings" section (page 11), surreptitious advertising is mostly practiced in sectors with advertising restrictions, with a total of 50% of the cases recorded. At the same time, these are the institutions operating in such fields as health, tobacco, alcohol and education. This high rate shows that these sectors are trying to find other media in which to publish or broadcast their advertisements so that movies, press releases, magazine programs, and news programs have become new mediums for advertising. These new media mean additional advertising revenue for the media industry.

The most significant indicators of surreptitious advertising can be sorted as follows: "Focusing on brand and showing the product for a long time"; "Showing the brand name in close-up"; "Presenting the product as disconnected from the context"; "With regard to products that contain visual or verbal expressions of praise" (Taşkaya, 2008).

According to these findings, surreptitious advertising is concentrated in programs that are within their own activity field. This tendency is the most suitable method for the manipulation of surreptitious advertisements with the possible outcome that viewers would not have noticed that the "ads" were there – thus potentially become more open to persuasion. For example, it seems reasonable to be confronted with a saucepan branded Tefal in a cookery program. This tendency is the most suitable method for the manipulation of surreptitious advertisement.

The most frequent form of surreptitious advertising is product placement and advertisements under the cover of news and magazine programs. For example, a doctor's positive comments in an interview about his hospital could be presented as news. Similarly, innovations in the health field are generally shown in the news along with brand presentation.

The principles of public interest have been rendered increasingly irrelevant by the stretching of rules and codes, and with regulations that parallel the neo-liberal market approach in the field of publishing. In this regard, publishing rules and ethics codes that must be followed within the framework of separation principles have been increasingly ignored by neo-liberal market dynamics.

Surreptitious advertising is "deceiving' because audiences are not consciously aware of the intention and may not feel that they have been exposed to advertisements. Moreover, such advertisements are against the fair challenge principle. Hence, as is the case in many countries, surreptitious advertising is banned in Turkey too.

The interests of capital groups have been a priority in the formation of regulations that have been introduced by neo-liberal policies. These regulations provide the necessary environment to ensure the smooth functioning of

neo-liberal economic policies. An exclusively profit-oriented commercial approach is a product of these policies also, and violations of the advertising rules in areas that are even directly related to human health are fed by these policies.

The work done under the name of product placement overlaps and intersects with surreptitious advertising, and this can be seen when taking into account the descriptions, classifications, kinds and targeted effects of product placement. At this point, in order for advertisers to reach their goals, product placement often needs to be converted into surreptitious advertising.

It would be misleading to suggest that surreptitious advertising could be easily contained – let alone eliminated. Even if we assumed that all relevant parties had good will, the dynamics driving global capitalism are specifically designed to exploit public-oriented policy and regulation while feeding the steady demands of the market with an impulse for profit. Furthermore, the European Union has plans to allow free product placement. We may expect to see this new "freedom" applied in Turkey and thus product placement practices of a "legal" kind will be established according to the interests of market forces. Nevertheless, it must be kept in mind that product placement can be easily converted into surreptitious advertising.

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End Notes

[1] In some references, the term "brand placement" is used instead of "product placement". See Sarıyer, 2005: 217-237.

[2] Turkish Radio and Television Corporation is the primary television broadcaster and national public broadcaster of Turkey

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