



Public Health Association
AUSTRALIA



ALCOHOL ADVERTISING: The effectiveness of current regulatory codes in addressing community concerns
Australian National Preventive Health Agency

21 March 2013

The Alcohol and other Drugs Council of Australia (ADCA) and the Public Health Association of Australia (PHAA) welcome the opportunity to respond to the ANPHA paper on *Alcohol advertising: the effectiveness of current regulatory codes in addressing community concerns*.

ADCA is the national non-government peak body representing the interests of the Australian alcohol and other drugs (AOD) sector. It works with government and non-government organisations, business and the community to promote evidence-based, socially just approaches aimed at preventing or reducing the health, economic and social harm of alcohol and other drugs to individuals and the broader Australian community.

The PHAA is recognised as the principal non-government organisation for public health in Australia and works to promote the health and well-being of all Australians. The Association seeks better population health outcomes based on prevention, the social determinants of health and equity principles.

Our submission supports the submission by the National Alliance for Action on Alcohol (NAAA), having had extensive involvement in the development and commentary of the NAAA submission, and acknowledges the additional concerns and issues raised in the submission by the McCusker Centre for Action on Alcohol and Youth (MCAAY). NAAA is a national coalition of health and community organisations from across Australia that has been formed with the goal of reducing alcohol-related harm. It was established because these organisations recognise that there is an urgent need for action to challenge Australia's harmful drinking.

Brief background

Alcohol is the most widely used drug in Australia (AIHW 2008a) and has been associated with short and long term harm through injury, disease, and intentional self-harm (NHMRC 2009; Chikritzhs et al 2003). It is one of three prevention targets that have been set by ANPHA (ANPHA, 2010) with excessive consumption a major risk factor for morbidity and mortality.

It has been estimated that harm from alcohol was responsible for 3.2% of the total burden of disease and injury in Australia in 2003 (Begg et al. 2007). Current consumption levels in Australia are high by world standards (WHO 2008), with patterns of high risk drinking among young people and in some Indigenous communities of particular concern. Research shows that occasional or weekend excessive drinking poses the greatest risk in relation to alcohol-related violence, accidents, and injury.

Alcoholic beverages are deeply entrenched in Australian society and there are substantial economic interests in their production and distribution. Because of this and the importance of minimising the harmful impact of alcohol consumption, public policies should aim to reduce the harms of drinking. In some areas, Australian governments have led the world in doing so, such as drink driving and reduced taxes on low-alcohol beer. However, in other areas Australian governments have lagged behind, such as addressing the drivers of consumption.

The three most effective strategies to reduce consumption relate to price, access and availability and advertising, marketing and sponsorship. ANPHA has previously considered the issue of pricing in its issues paper on *Developing the public interest case for a minimum (floor) price for alcohol*.

Why it is important that we look at alcohol advertising

Alcohol advertising is pervasive. In addition to traditional media such as television, radio, newspapers, magazines, billboards, buses and cinema, alcohol advertising and marketing is now found in new platforms such as Facebook, Twitter, blogs, podcasts and SMS, and placed in video games, broadcast at cinemas and in the movies seen within them, and on commercial and promotional material. Some advertising is obvious and some much more subtle.

The alcohol industry markets itself extensively through sponsorship of sporting and cultural activities, and is well and truly cemented as part of our lives. So much so that we don't even think about the inappropriateness of a beer or spirits company sponsoring young children at surfing carnivals, or the irony of a sporting captain announcing at a press conference that a player is being sent home for inappropriate alcohol related behaviour, while wearing his cap brandishing a beer company logo.

Alcohol is promoted so much that it is seen as a normal part of our lives. Those who don't drink are in the minority and those that warn against the potential harms from too much alcohol are described as wowsers, fanatically puritanical people who want to stop others from having a good timeⁱ.

Not only is alcohol advertising everywhere, there are limited controls on content and placement. Some would argue that alcohol advertising has no impact on people's consumption and therefore controls are not required, yet in 2009, the industry was spending approximately \$125million each yearⁱⁱ on advertising and marketing. It has targeted different groups such as young people and timed its advertising exposure to maximise its effectⁱⁱⁱ. The value of this investment is backed up by the research which has shown that exposure to repeated high level alcohol promotion inculcates pro-drinking attitudes, increases the likelihood of heavier drinking, shapes young people's perceptions of alcohol and drinking norms, and predisposes minors to drinking well before the legal age of purchase^{iv}.

This is why the proliferation of alcohol advertising, marketing and promotion activities and the relationship building and connections between online and real world activities is of such a concern. Brands facilitate interactions, they don't just convey messages and they use social media to embed alcohol consumption within the mediation of everyday life^v. Interaction isn't just about circulating messages; it is also about surveillance and profiling.

Comments and recommendations

The NAAA submission addresses in detail the effectiveness of Australia's current regulatory system for alcohol advertising and makes a number of comments and recommendation. In particular, ADCA and PHAA would like to draw attention to the following:

1. The pervasive nature of alcohol advertising and deliberate targeting of young people'
2. the extensive nature of the relationships that are being developed through promotion and sponsorship of sporting and cultural events which can then be linked with internet activities eg through Facebook where young people can like pages, share pages with their friends, upload and share photos at events,

3. the clear bias of the current self-regulatory system through ABAC
4. the failure of the current system to adequately regulate and respond to marketing activities
5. the risks and inappropriateness of drawing on the research and advice from industry and industry funded bodies about addressing alcohol related harm given their clear conflict of interest
6. the inappropriateness of the alcohol industry in being involved in the decision making relating to policy development and regulation of alcohol, including alcohol advertising
7. the inadequacy of the current regulations that refer to 'target audiences' and ignore other audiences
8. the current regulatory framework in Australia needs reform to achieve a comprehensive legislative framework for regulating alcohol advertising that:
 - covers all forms of alcohol marketing, and is flexible enough to adapt and respond to changing environments;
 - establishes clear public policy goals for the regulation of advertising, such as the protection of vulnerable groups like children and young people;
 - creates an independent regulatory body for administering the system with the powers to formally investigate and penalise breaches of the alcohol advertising rules; and
 - introduces meaningful sanctions for serious or persistent non-compliance by advertisers.

ADCA and PHAA suggest that consideration should be given to different models of alcohol marketing and regulation. France's Loi Evrin restricts the advertising of alcohol to factual information about the product and limits the environments in which the advertising can occur. The recently released *Health First* paper by the Alcohol Health Alliance UK argues that the evidence on the impact of advertising on young people and the evidence from tobacco control provide a strong case for a comprehensive ban on advertising and sponsorship. It argues that perceptions will only change if you remove the imagery from everyday life.

9. Action could commence to:
 - remove the current exemption in the Commercial Television Code of Practice
 - prohibit alcohol advertising in media that appeals to people under the age of 25
 - restrict the sponsorship of sporting and cultural events, organisations and/or participants (such as sports teams or athletes) by alcohol companies that are of high appeal to people under the age of 25, and
 - explore controls on the promotion of alcohol through the internet, social, digital and new media should be addressed as a matter of urgency.

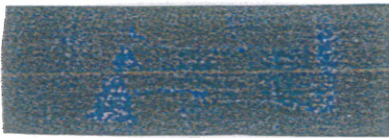
With respect to the controls on the sale of alcohol products, states and territories that currently do not permit the promotion and sale of alcoholic beverages in shops that sell other products such as supermarkets should continue this restriction, and in those states and territories where alcohol products are sold in supermarkets, corner stores etc, these should be located in a position that is separate to the food and in a quiet location that is not prominent. Point of sale promotions should only be in those separate spaces.

Thank you again for the opportunity to provide comment on the paper discussing the effectiveness of alcohol regulation. We would be happy to discuss this further and would welcome the opportunity to be part of discussions on how to better regulate alcohol advertising in this country. Please contact

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Yours sincerely



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ⁱ <http://www.macmillandictionary.com/dictionary/british/wowser>;
<http://oxforddictionaries.com/definition/english/wowser>

ⁱⁱ Monitoring of Alcohol Advertising Committee (MAAC). *Alcohol beverage advertising in mainstream Australian media 2005 to 2007: expenditure and exposure*. Department of Health and Ageing. Commonwealth of Australia. Canberra. 2009. Accessed from:

<http://www.nationaldrugstrategy.gov.au/internet/drugstrategy/publishing.nsf/Content/alcohol-advert>

ⁱⁱⁱ Monitoring of Alcohol Advertising Committee 2009 *Alcohol beverage advertising in mainstream Australian media 2005 to 2007: expenditure and exposure*. Department of Health and Ageing Commonwealth of Australia Canberra

^{iv} Thomas Babor, et al 2003 *Alcohol – No Ordinary Commodity* (1st ed. 2003), Oxford press p183

^v CARAH N 2012 AMA NATIONAL SUMMIT ON ALCOHOL MARKETING TO YOUNG PEOPLE, CANBERRA SEPTEMBER 2012