

February 27, 2013

Dear Sir/Madam

Re: ANPHA Issues paper, December 2012: 'Alcohol advertising: the effectiveness of current regulatory codes in addressing community concerns'

I appreciate the opportunity to contribute a submission to the review of alcohol advertising code schemes in Australia. I am a librarian and researcher currently undertaking doctoral studies investigating alcohol advertising standards and complaint procedures. In this submission, I urge ANPHA readers to consider a longer timeframe to give proper regard to the history of preventative health policy in Australia, beginning just before the launch of the National Campaign Against Drug Abuse. Much of this literature still awaits conversion to web-accessible formats; but what we currently have available is illuminating---if we have sufficient background to appreciate its implications. Alcohol policy making in the public interest has evolved through siege cycles influenced by circumstances and individuals as well as institutions; Martin Hagger's submissions to the ANPHA 'floor price' paper suggest that public knowledge about these matters is limited; critical examination of the documentary record illuminates the obstacles faced by public communicators.

My submission is organised as follows:

I point out that some important sections of the Alcohol Beverages Advertising Code are missing from the version reprinted in the Issues Paper, and cite some literature that might interest readers of these submissions, in addition to the references already compiled by ANPHA.

I variously cite and quote from the peer reviewed scientific and academic literature, government and expert reports, ABC television broadcasts, Parliamentary speeches from the Senate Hansard, and case reports of the Alcohol Beverages Advertising Code Scheme and the Advertising Standards Board.

I conclude with some photographs I have taken of advertising in my local area.

Important text omitted from the *Alcohol Beverages Advertising Code (ABAC)* as reprinted in ANPHA Issues Paper

The Alcohol Beverages Advertising Code (Management Committee of the ABAC, 2004 rev.) as it appears in Appendix A, p. 28 of the Issues Paper is missing two important sections: the Preamble and Definitions; some points about why this matters are briefly described, below. Changes to definitions and preamble, among other changes from the previous version of the Code were described by Saunders (1989, all italics in original):

In the previous and the current Alcoholic Beverage Advertising Codes, an adult is defined as someone who is over 18. But while in the earlier code all models appearing in ads had to be 'over 25 years' of age and were required to appear to be '*obviously over 21*', in the current code this last phrase has been changed to 'shall clearly be depicted as adults'... people appearing in ads now need only to look *like 18 year olds*.

In the previous code, alcohol ads were required to be directed only to adult audiences ...young people can now be exposed to alcohol advertising as long as the ad doesn't have 'strong or evident appeal to children or adolescents'.

The previous clause which prohibited promotion of increased consumption in general has been totally omitted.

Finally, the clause requiring that advertisements 'shall not depict or encourage consumption at a frequency or in a quality likely to lead to over-indulgence' has been totally omitted. There is a requirement that advertisements shall not promote excessive consumption or the misuse or abuse of alcohol. But such terms are impossible to define. After all, one person's excessive consumption is another person's good night out. The terms misuse and abuse have both been deemed ambiguous by the World Health Organization and that body recommended that they be dropped from use.

Previously, alcoholic beverage ads could not 'claim or *suggest* that drinking alcoholic beverages can contribute towards social, sporting, or sexual achievement'. Given that all alcohol ads suggest at least one (if not all) of these, the wording has been rephrased to 'it is unacceptable to depict the consumption or presence of alcoholic beverages as a cause of, *or contributing to*, the achievement of personal, business, social, sporting, sexual, or other success'.

The last passage above essentially splits the scheme between ABAC and the Advertising Standards Bureau, contrary to a key recommendation of the NCRAA review in 2003 cited in the Issues Paper (National Committee for the Review of Alcohol Advertising, 2003). The Alcohol Advertising Review Board scheme at Curtin University launched last year by Professors Fiona Stanley (2003 Australian of the Year) and Mike Daube has closed this loophole by adding a single clause in the self-regulatory code already approved for use in New Zealand ("Alcohol advertisements shall not be sexually provocative or suggestive or suggest any link between liquor and sexual attraction or performance" adapted from New Zealand Code for Advertising Liquor 2(d) <http://www.alcoholadreview.com.au/about/the-code/the-code-2/4d-alcohol-and-sex/>).

Another key phrase from the Preamble reads as follows (my italics):

The conformity of an advertisement with this Code is to be assessed in terms of its *probable impact upon a reasonable person* within the class of persons to whom the advertisement is directed and other persons to whom the advertisement may be communicated, *and taking its content as a whole*.

If the purpose of the code is to protect underage and other vulnerable persons from exposure to inappropriate marketing, this legalistic approach confounds the ostensible mission of the Code and supports the arguments of marketing historians and health policy experts (e.g. Crawford and Spence-Stone, 2012; Lexchin, 2003) who describe the purpose of self-regulatory codes as protecting industry from the public.

Babor and colleagues (2008) have conducted research to:

develop reliable procedures to monitor the content of alcohol advertisements broadcast on television and in other media, and to detect violations of the content guidelines of the alcohol industry's self-regulation codes

And concluded that

Naive (untrained) raters can provide consistent (reliable) ratings of the main content guidelines proposed in the U.S. Beer Institute Code. The rating procedure may have future applications for monitoring compliance with industry self-regulation codes and for conducting research on the ways in which alcohol advertisements are perceived by young adults and other vulnerable populations.

Babor and colleagues have further noted (2008) that

A second reason for the lack of strong reliability coefficients could be the ambiguous wording of some of the guidelines (e.g., Item 6c: “This ad claims or suggests that people cannot solve social, personal, or physical problems without drinking the alcohol product”), which may make judgments difficult and imprecise. Wording of the items was in most cases taken directly from the code subguidelines to provide an accurate representation of industry intentions.

Problems encountered in the operationalization of many of the guidelines included complex sentence structures (which required the development of multiple items for each clause or phrase), double negatives, and unfamiliar judgments that were primarily designed to prevent cutthroat competition among beer producers (e.g., Item 8: “This ad makes fun of competing alcoholic beverage brands . . .”). Because these guidelines tend to be written or at least reviewed by lawyers, many do not conform to the survey design practices of social scientists.

Comparing successive code versions in relation to wider processes shows the persistence of ‘legalistic boilerplate information’ (Holder-Webb and Cohen, 2012), for example

The Council was, pursuant to clause 3, required to assess the conformity of the commercial with the Code in terms of its probable impact, taking its content as a whole, upon a reasonable person within the class of those to whom the commercial was directed and also taking into account its probable impact on persons within other classes to whom it was likely to be communicated”

Quoted in Saunders et al (1995), from Advertising Standards Council (8066/24 October 1990) dismissal of complaint re: Southern Comfort ad previously screened on ABC TV, Lateline in July of that year (ABC TV, 1990).

In 1983, Chapman asserted

even a cursory look at self-regulation systems shows them to be purposely full of loop-holes, taken up largely with infalsifiable prescriptions and virtually complaint-proof, thanks to the ambiguities inevitably involved in making subjective judgements.

In 1977, Chapman and Rubenstein commented further on the difficulties in replying on content-based code schemes:

When someone buys alcohol they are buying the means or the key to an altered state of consciousness ... an altered experience of themselves ... the liquor industry have known this for

a long time and exploit it in their advertising....The voluntary code of restraint of certain explicit messages in liquor advertising is a positive step, but will it really amount to anything given advertising's ability to work implicitly and create new myths?

Hamel (2012) has described the problem in facing up to apparently intractable policy problems in the alcohol context

While there is—as always—the need for more research, the paucity of scientific knowledge is not the main impediment to action. The barriers rather, are structural and cultural, coalescing in what I term ‘political theatre’—actions by politicians and a select band of elite stakeholders that are performed for the benefit of an audience in order to distract from the policies that would actually work.

Suggested further readings in reviewing the history of self-regulation of alcohol promotion in Australia

The Senate Standing Committee on Social Welfare, known as The Baume Committee, was prescient in their 1977 report, *Drug problems in Australia: An intoxicated society?* This ancestral document to today's National Drug Strategy contains the text of the Media Council of Australia's ‘Voluntary code for advertising of alcoholic drinks’ as well as the ‘Voluntary code for advertising of cigarettes in print media’. One can speculate about opportunities lost when the government of the day declined to accept several recommendations of the Baume Committee. I recommend ANPHA readers have regard to the Ministerial Statement on the Government's response (Guilfoyle, 1980) as well as the speeches in reply (for example, from Baume Committee member Senator Grimes):

Ministerial Statement excerpts

The Government recognises that the introduction of the Senate Committee's proposals relating to the use of taxation policies to reduce the overall consumption of alcohol would have significant implications for the Budget, the overall level of prices, the relative price structure of alcoholic drinks, and the wine, brewing and spirits industries ... Clearly, such proposals would have serious implications. The Government will, however, take health considerations into account when formulating levels of excise on alcohol in future Budgets.

Recommendations 4 to 7

That government imposts on all alcoholic beverages be adjusted annually so that real prices of the beverages remain constant. That government revenue policies operate to keep at approximately the same level the prices of the absolute alcohol contained in beer, in wine and in spirits, bearing in mind that the Government has at its disposal various revenue devices with which it can achieve this aim. That a sales tax or excise on wine be phased in over a period which will enable the wine industry to adjust appropriately. That the excise imposed on beers of a low alcohol content (defined as not more than 2.5 per cent by weight) be 30 per cent less than that on other beers.

Response

Tax rates on alcohol are matters to be determined in a budgetary context: the Government will take health considerations into account in setting those rates.

Recommendations 20 to 22

That the Commonwealth Government ban the advertising of alcoholic beverages, whether by way of corporate advertising or by exhibiting of the brand name of such beverages in a planned fashion, on radio and television and in areas under direct Commonwealth control, such as in the Territories and at airports. That, until a total ban has been implemented, the question of substantial compliance with the voluntary code for the advertising of alcoholic beverages by brewers, distillers, wine makers and all retailers of alcoholic beverages be reviewed annually. That State Governments and local government authorities be encouraged to ban the advertising of alcoholic beverages.

Response

The Government does not support a total ban. The Government notes that the industries concerned have developed a uniform voluntary code of advertising of alcoholic beverages. This code is oversighted by the Alcoholic Beverages Advertising Council and monitored regularly by the Commonwealth Department of Health. The Australian Broadcasting Tribunal and Trade Practices Commission already play important roles in this area.

Recommendation 24

That the Commonwealth Government make any grants to sporting and cultural bodies conditional on their not accepting money from manufacturers and retailers of alcoholic beverages and investigate the possibility of indemnifying such bodies for loss of revenue, at least in the short term.

Response

Not accepted: some sporting and cultural bodies would experience financial difficulties, as it is unlikely that other interests would take over the support foregone, if the proposal were introduced.

Recommendation 25

That the Commonwealth Government consider refusing tax deductibility for expenses incurred in the promotion of alcoholic beverages.

Response

Not accepted. This proposal is inconsistent with the general principle of the income tax law that expenditure incurred in deriving assessable income, or necessarily incurred in carrying on a business for the purpose of deriving assessable income, is an allowable deduction provided the expenditure is not of a capital, private or domestic nature. Furthermore, adoption of the recommendation would involve the complex task of isolating expenditure on promotion and, in the case of multiproduct enterprises such as retailers, it would be necessary to isolate the costs of promoting a particular product, or range of products, from their general costs of promotion.

Reply, Senator Grimes

I do not wish to speak for long on this subject. It is interesting that the Government's response to the report of the Senate Standing Committee on Social Welfare should have been made two and a half years after the report was brought down. Significantly enough, the response came one day after the tabling of the very important report of the Royal Commission of Inquiry into Drugs. The response to the Senate Committee report has interrupted the debate on the Royal Commission's report. Hence, I have no desire to hold up the proceedings of the Senate. I believe that we can probably discuss sensibly all the matters involved in the debate on the Williams Report.

...

I cannot share Senator Baume's enthusiasm for the statement that has come down any more than I could share the Government's enthusiasm yesterday for the response from Mr MacKellar on the Royal Commission's report. After two and a half years' consideration of what I believe was a very good and important report, one that was well accepted throughout the community, all we have, in the words of Senator Baume, is a declaration of intent. The Government has spoken about what it intends to do, not how it intends to do it. It has said nothing about the expenditure of any of the vast sums of money that it receives every year from excise on tobacco and alcohol. For example, the statement reads:

...

In the terms of that policy, the Government will employ preventive and curative measures to combat alcohol abuse.

...

Nowhere in the statement are preventive or curative concrete measures written down and presented to the Parliament to prevent the very real problems that alcohol causes. I remind the Senate that the Standing Committee described the alcohol problem in this country as having the dimensions of a national disaster. It listed an extraordinary number of deaths of Australians over 30,000- caused by alcoholism in the last 10 years. It said that deaths from cirrhosis had risen by 75 per cent, a quarter of a million Australians could be classified as alcoholics and that one in every five of our hospital beds is occupied by a person suffering from the adverse effects of alcohol. The Committee referred to similar problems caused by tobacco. The Government accepted the report at the time. The Senate has had two full debates to my knowledge about the report. Yet, after two and a half years, we have a 16-page statement of intent. The Government intends to take certain measures when it has the money.

...

The very important and sensible recommendations about advertising are passed over. The very important and sensible recommendations about cutting the excise on low alcohol beer to encourage its use and equating the excise on all forms of alcohol are passed off with the statement that these are budgetary matters and that perhaps in the future health factors will be considered. Health factors should be considered all the time. They should be primary in the calculation of what sort of excise we should put on alcohol and whether we should encourage the use of low alcohol beer in the community.

We have had the extraordinary statement from Senator Baume that for the first time ever government has admitted that tobacco is harmful to health. As an ex-smoker, I can well remember reading on every packet of cigarettes I had a statement which was put there by government regulation that tobacco is harmful to health. Governments and everybody else in this community have recognised this for years. It is just not good enough for governments to put down statements saying that they know that these things are harmful and that it is bad to use them and to consider that that is a significant step forward, any more than it is sensible to tell us in this statement that we can control the sort of advertising of alcohol we have in this community through self-regulation by the advertising industry or the brewing industry. I do not believe that Senator Baume was really serious when he said that he thought that that was the correct proposition, and I am certain that Senator Walters will not think so.

The brewers and the advertisers claim now that they do not take advantage of sporting heroes or champions to promote their goods in this country. Of course they do. They always have and they still do. They get round the television advertising ban very effectively, as anyone who watches cricket, football or anything else on television in this country will know. The Senate Select Committee recommended that we should get over this problem by banning this sort of advertising, which is affecting the consumption that is causing the two biggest drug problems in this community.

...

I cannot speak for the whole Committee. I do not think any member of that Committee believed that the advertising of tobacco and alcohol had other than the primary aim of increasing the consumption of alcohol and tobacco. Certainly part of it is for increased grandeur. But for the alcohol and tobacco industries to claim that the advertising is not aimed at increasing the consumption of alcohol and tobacco is utter nonsense.

Readings describing potential ways forward

More detailed exposition on the importance of measuring actual impact, as opposed to probable impact assessed by industry appointed regulators has been provided by Saunders and colleagues (Saunders, 1993; Saunders et al., 1995; Saunders and Shoebridge, 1991; Saunders and Yap, 1991); his findings received extensive coverage in the media of the day (ABC TV, 1990, 1991). These findings anticipated the recent work of Babor and colleagues funded by the US National Institutes of Health (Babor et al., 2008; Babor et al., 2010). Babor and colleagues, like Saunders, found that changes to industry-designed and administered codes that coincided with the study periods of their respective projects weakened protection against inappropriate advertising.

In these studies by Babor et al and their Brazilian colleagues (e.g. Vendrame and Pinsky, 2011; Vendrame et al., 2010) investigators focused on developing methods (rating scales using psychometric testing) that would depend less on expert judgment and produce better agreement between lay judges, speculating that such methods could resolve policy siege cycles and strengthen the system through increased civic participation, perhaps via the use of rotating panels with memberships drawn from the general public and affected populations.

This approach offers the potential to operationalise research by leading Australians in the field, such as Professor Sandra Jones, Professor Robert Donovan, Mr Geoff Munro, Professor Mike Daube and Professor Simone Pettigrew, on the elements in alcohol advertising reported by youth respondents. This approach would seek to discover the actual as opposed to the probable impact on affected populations as determined by industry-appointed panels. A potential model is also provided by Schibeci and colleagues (Schibeci and Harwood, 2007; Schibeci et al., 2006) in their work on participatory citizen engagement in science policy. Such an approach could be applied to both proactive advertisement monitoring and complaint adjudication.

Case Reports of the Regulators

I also recommend reading the regulators' case reports, especially the ABAC reports which constitute the collected commentaries of Chief Adjudicator, (1988-) QUT Emeritus Dean of Law and former Attorney General of Australia Professor Michael Lavarch. His summaries of the arguments of complainants and industry respondents in his commentaries illustrate the limits of the present scheme. They often call for specific improvements that go to the heart of ANPHA's deliberations. Munro and De Wever (2008) have described how these calls have gone unanswered.

For example, a recent review of case reports regarding cross promotion of petrol and alcohol reveals the weakness of the scheme in answering community concerns regarding this practice by liquor retailers controlling large blocks of market share (21% in one case, 37% in another, according to McCusker Centre for Action on Alcohol and Youth, "Major alcohol sales outlets, 25 July 2012"). Currently, these retailers can ignore the determinations of ABAC:

Coles Liquor is committed to the responsible service, supply and promotion of liquor and has in place internal guidelines and policies regarding them. We confirm that we are not a signatory to the ABAC Code, particularly as we have our own policies in place, nor required to formally respond to complaints received by ABAC. All circumstances considered, we invite ABAC to decline to entertain the complaint (ABAC, 2011)

whilst simultaneously claiming they are in harmony with the scheme's objectives :

In addition to complying with relevant legislative obligations and industry codes Liquorland has a long-standing commitment to the responsible service of alcohol. Liquorland also maintains compliance measures and expectations of its liquor advertising materials. Liquorland considers its materials accord with all of these commitments which are generally consistent with the spirit of ABAC. Whilst acknowledging the importance of the aims of the ABAC Scheme, Liquorland considers that it has acted responsibly at all times and that it is reasonably apparent that the relevant advertising does not amount to a breach of the ABAC when assessed taking the content as a whole (ABAC, 2012).

Previous responses to complaints by the advertiser as published in case reports of ABAC, as well as the ASB, document the powerlessness of ABAC and the impunity of large retailers.

The industry position of Wesfarmers in controlling 21% of Australian liquor retailing market share via outlets like Liquorland, coupled with the lack of regulatory oversight, indeed provides a perverse *incentive* to use cheap alcohol as a loss leader to increase its market share over leading competitor Woolworths (with 37% of the liquor market including outlets Dan Murphy's and BWS). This state of affairs would seem to contradict ANPHA's proposed evidence-based initiatives to reduce alcohol-fuelled harm in the community e.g. by establishing a floor price.

Under self-regulation, Liquorland and BWS (see photo taken 13 December in Brisbane, below, personal collection, Sarah Yeates) are able to flood media (including TV, public transport/street furniture and shop fronts, giant billboards, the newspapers, the internet and social media, supermarket printed dockets and purchase separation bars at checkout) with cheap alcohol incentives that are linked to the necessities of daily life, such as petrol and groceries, as well as associating bulk alcohol with driving.



The argument advanced by the advertisers, and accepted by ABAC, has been that this type of cross promotion in and of itself cannot be claimed to necessarily encourage excessive consumption or drink

driving; this stance conflicts with medical and public health peer reviewed literature and expert panel reviews as well as the views of complainants in the case report archives.

McDermott and Trinca (1983) drew an explicit connection between television advertising and drink driving adapted from their expert submission to the Australian Broadcasting Tribunal predicting that legislation would be required. Thirty years later, recent cases illustrate ongoing concerns about liquor outlet advertising practices not answered by the ABAC and ASB management scheme and panel decisions.

Some support for the view that the use of discounted alcohol could be regarded as socially irresponsible might be drawn from the first panel ruling dismissing such a complaint (ABAC, 2005):

It could be argued that the advertisement:

- Encourages excessive consumption of alcohol, by offering financial discounts in return for volume purchases of wine;
- Is an irresponsible approach to the advertising of alcohol products when considered against the policy intent of the drink driving laws of New South Wales, and Australia more generally; and
- Makes a direct association between alcohol consumption and the use of motor vehicles, by offering significantly discounted petrol in return for volume purchases of alcohol products.

...

The Panel is of course mindful of research ... which identifies that price is a predictor of the level of alcohol consumption in some circumstances and that consumption trends amongst young Australians does show tendencies towards so called binge drinking...the Panel does not believe that [discount offers linked to fuel discounts *per se*] is in breach of ... the Code... it is a more open question ... whether [it is] a responsible and balanced approach to alcohol marketing... Alcohol is not simply another product. The Advertiser itself recognized the sensitivity ... by placing the “if you’re going to drink don’t drive” message immediately under [the ad]... this is essentially a test made against community standards... The panel believes that great caution should be exercised in using fuel discounts to promote alcohol sales and it would be best practice not to use such devices.

In another ruling on a Liquorland complaint (ABAC, 2006), Coles was criticized by the Panel which declared its intention to ask the ABAC Management Committee to “raise directly with Coles Myer its attitude to the ABAC scheme and that the relevant Federal and State Ministers comprising the Ministerial Council on Drugs and Alcohol be advised of Coles Myer’s “rogue” position”.

Compare the above to subsequent rulings by ABAC on whether an association is necessarily drawn between drinking and driving by such offers; these usually involve chiding Liquorland/Coles/Wesfarmers for its refusal to participate in the ABAC scheme while dismissing complaints which object to the linkage of petrol and alcohol discounts:

This issue has been considered in previous ABAC Determinations ... in which the Panel noted that in order to breach section (d) of the Code there must be a depiction of a direct association between the consumption of alcohol beverages and the operation of a motor vehicle. Given that the advertisement refers to the purchase of alcohol beverages but not the consumption of alcohol and a discount on the price of petrol but not the operation of a motor vehicle, this advertisement does not breach section (d) of the ABAC.

In answer to such arguments I would invite ANPHA to consider the following direct quotations from complaints published in ASB case reports (all complaints were dismissed):

It was posted on the petrol bowser and I think linking alcohol with any petrol discounts is a really poor choice. It flies in the face of all the money spent on trying to reduce drink driving and the effects of drink driving. Sure not everyone who buys several cases of beer is going to drink...but to some it's like offering candy to a kid (complainant quoted in ASB, 2012).

I find it amazing that a company would dare to link the purchase of alcohol with the purchase of petrol. Surely this doesn't make sense, especially when governments are spending huge amounts of money funding anti drink driving messages. ("A high-octane offer" television ad that features the Liquorland logo "morphing" into a petrol pump with a drop of petrol bearing the offer of 20 cents a litre petrol discount if six bottles of wine are purchased on a single occasion for \$30, (ASB, 2006))

Drinking and driving are to be discouraged as far as possible. This ad is actively encouraging drinking and driving by offering cheaper petrol. I have a moral objection to this type of companion selling. I believe ANY purchase of liquor should be exempt of a petrol discount (television advertisement, "Rush in to Safeway Liquor now" (ASB, 2007)).

It is encouraging the purchase of alcohol in association with vehicles and driving. Woolworths should offer 20 cents a litre off fuel for more healthy or other products. This promotion I find to be offensive and counter-productive. This does not encourage family values - only to promote and sell a drug product (ASB, 2008).

In other cases, liquor outlets owned by Wesfarmers/Coles and Woolworths were criticised for linking alcohol promotions with Santa Claus and Rudolph the Red-Nosed Reindeer (ABAC, 2008a), Easter eggs (ABAC, 2008b) and grocery vouchers (ABAC, 2007) or just using children and happy families to promote liquor sales:

I object to the babes in arms waving balloons in this advertisement. It indicates to everyone that it is a very happy place to shop with everyone smiling and in my opinion gives the wrong impression to children. If children watch this advertisement it would probably seem to them that a liquor store is just as exciting as a lolly shop. As the Father of an alcoholic son I can see the problems associated with the consumption of alcohol first hand. I don't think young children should be in any alcohol advertisement. It's not just the babies that I am concerned about but young teenagers are very impressionable and this particular advertisement keeps saying how easy it is to buy alcohol and it makes it look such a happy experience to buy alcohol (ASB, 2010).

The ABAC case reports documents are unfortunately underused and much less well known than the ASB case reports, possibly due to the underdeveloped and user-unfriendly ABAC website. Readers wishing an introduction to this material should consult Munro and De Wever (2008).

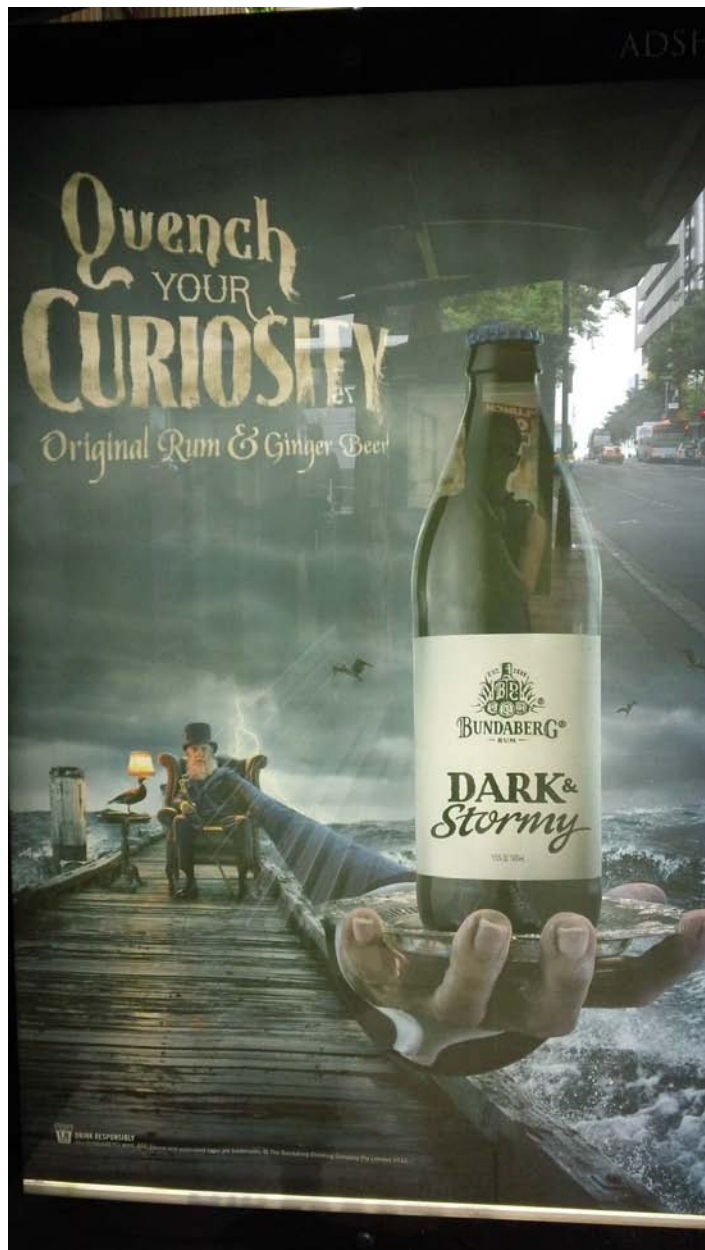
Photographs taken in Brisbane for submission readers to consider against Code provisions

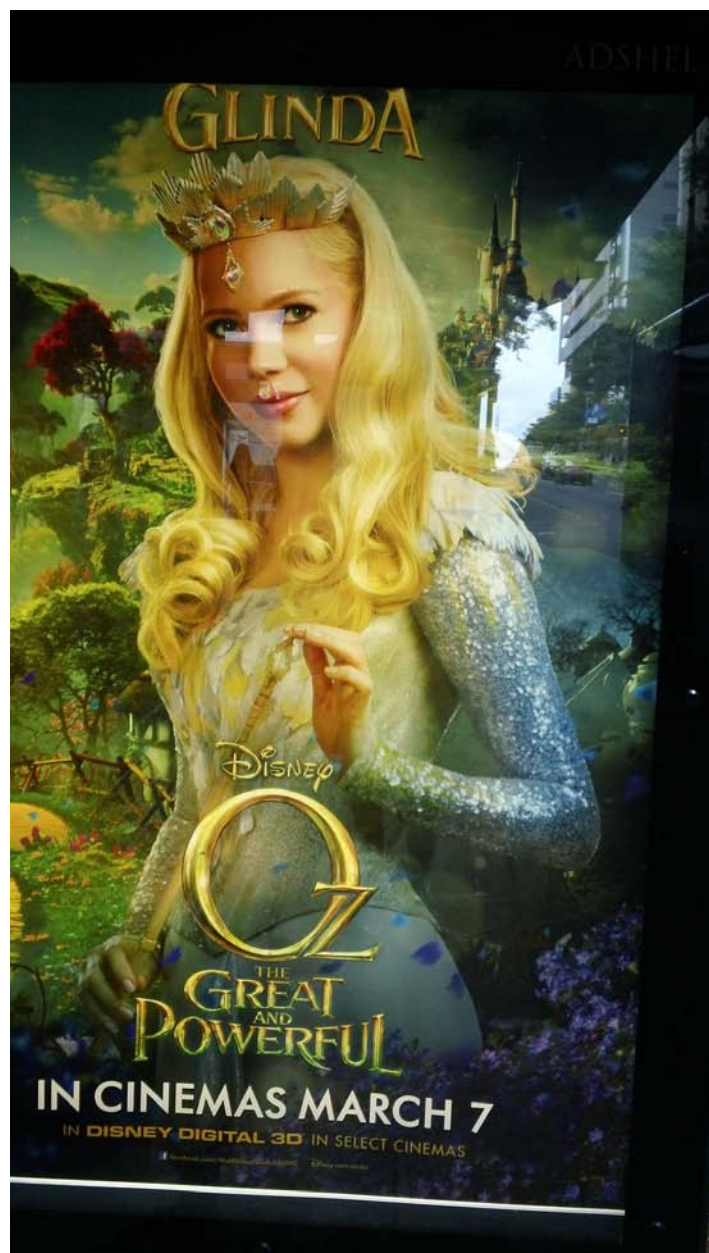
(All photographs below are personal collection of Sarah Yeates)

Bus stop, Royal Children's Hospital – Ad for film promoting binge drinking as a rite of passage featuring male youth wearing women's underwear and a teddy bear whilst standing on a car in an intoxicated condition to celebrate becoming an adult of legal drinking age



Bus stops in central Brisbane-three adjacent matched pairs like these of ads for alcopops and a new Disney version of The Wizard of Oz, in an area flooded with schoolchildren on public transportation





Rotating poster at the Magistrate's Court where many alcohol affected persons attend court in one capacity or another



Bus shelter next to the Salvation Army Individual Lifestyle Support Service – very visible to alcohol affected clients visiting the premises



I will be following the ANPHA's work with interest as I carry out my studies, which will include a comprehensive analysis of the published case reports of ABAC and related reports on alcohol advertising by ASB. This work will also scope the potential use of code revisions along the lines described by Babor et al to envision a modified future for alcohol advertising control that combines more objective methods of appraisal with the participation in alcohol policy of everyday Australian citizens (in the sense of persons who are prompted to perform a self imposed civic duty according to their ideas of right and wrong, in response to being personally impacted by an advertisement, broadly conceived).

I wish the readers of this submission well and commend the appended references and ABAC case reports to their attention.

Sincerely,

Sarah Yeates

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