Supplementary Questions for Alcohol Beverages Australia

1. What research and evidence do you have to specifically refute the points made in the following submissions in relation to the purpose/effect of alcohol advertising on young persons drinking, and the exposure of young persons to alcohol advertising connected with sporting events:

a. Submission 9, NSW ACT Alcohol Policy Alliance (page 3)

The primary purpose of alcohol advertising is to increase sales, thereby increasing the amount of alcohol consumed either by more people or in greater amounts among drinkers.⁸ The entire premise

The NSW ACT Alcohol Policy Alliance is relying on a non-peer reviewed document, 'Technical note: Background on alcohol marketing regulation and monitoring for the protection of public health' by the Pan American Health Organisation to make this claim. This evidence is not suitably credible for the inquiry purpose.

A review of twelve longitudinal studies of more than 38,000 young people has shown that the volume of advertising they are exposed to influences the age that they start drinking as well as their consumption levels.¹⁰ This review also showed a dose response relationship between the volume of

The NSW ACT Alcohol Policy Alliance is relying on a systematic review 'Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies' to make this statement. This evidence is not suitably credible for the inquiry purpose. In spite of the care with which they are conducted, systematic reviews may differ in quality, and yield different answers to the same question¹. A systematic review allows for publication bias, where studies identified for inclusion, fit a pre-determined hypothesis.

Publication bias remains an area of contention amongst those who assess the quality of systematic reviews because it is unclear what the impact of publication bias is on making decisions in health care. Due to the way in which advertising exposure is quantified is not standardised across the reviewed studies in this particular review, it is unlikely that potential confounders have been accounted for.

In addition, it is important to note that this study does not find a causal link between alcohol consumption and age of alcohol consumption or volume. There is no evidence that is able to make a causal link between alcohol advertisement and underage consumption.

¹ Moher, D., Soeken, K., Sampson, M., Ben-Porat, L., & Berman, B. (2002). Assessing the quality of reports of systematic reviews in pediatric complementary and alternative medicine. *BMC pediatrics*, *2*(1), 3.

b. Submission 9, NSW ACT Alcohol Policy Alliance (page 10)

match at least one sport with its relevant sponsor.³⁵ This is not surprising given an estimated cumulative audience of 26.9 million Australian children and adolescents watching Australia's major televised sporting codes, AFL, Cricket and NRL are exposed to 51 million instances of alcohol advertising, with nearly half (47 per cent) of these broadcast during daytime programming between 6am and 8.30pm.³⁶

ABA's evidence to the inquiry described the percentage of viewers 18+ years of age among actual audiences for most of the major sporting codes in 2017, outlined as follows:

- NRL State of Origin Series 89%
- NRL Season 89%
- AFL Season 87%
- Super Rugby 92%
- Cricket 87%

Source: OzTAM Data, Weeks 1/01/17 - 25/06/2017

Despite the limited exposure of young people, it is the impact of this exposure that is important. There is no evidence of a causal effect between sports advertising and the incidence or commencement of underage drinking. Further, the ongoing drop in youth consumption trends is stark and speaks to the great strides forward on the part of governments, the health industry and DrinkWise to effectively communicate the potential harms of alcohol to younger Australians.

According to the latest National Drug Strategy Household Survey, fewer young people aged 12–17 years old are drinking– a consistent trend for more than a decade – with 82 per cent of this age group not drinking at all, constituting a 10 per cent rise in just three years².

The audience statistics would strongly suggest any young people watching these broadcasts are more often than not doing so with an adult/s. The opportunity is there for these adults to set a good example and/or discuss delaying and/or demonstrate sensible alcohol consumption, which is likely to have a far greater impact on underage drinking rates than any suggested restriction on advertising.

² Australian Institute of Health and Welfare 2017. National Drug Strategy Household Survey 2016: detailed findings. Drug Statistics series no. 31. Cat. no. PHE 214. Canberra: AIHW.

c. Submission 21, The Royal Australasian College of Physicians (page 5)

However there is a wealth of evidence that exposure of young people to alcohol advertising encourages early initiation into alcohol use¹⁵. It also puts young people at greater risk of engaging in harmful and risky levels of alcohol consumption¹⁶ and of developing long term alcohol use disorders.¹⁷ The most recent estimate of the impact of alcohol advertising on increasing drinking using Australian data found that for every increase of 1000 Targeted Rating Points (a measure of television advertising exposure) the odds of an adolescent drinking in the past month increased by approximately 10%, while the odds of an adolescent engaging in past-week risky drinking increased by 16%.¹⁸

However there is a wealth of evidence that exposure of young people to alcohol advertising encourages early initiation into alcohol use¹⁵.

Despite stating that "there is a wealth of evidence" the RACP is in fact relying on a single study 'Responses to televised alcohol advertisements associated with drinking behaviour of 10–17-yearolds' to make this statement. The research referenced does not establish a causal link between alcohol advertising and underage consumption. It is a very small sample size at 500 and the methodology is based on statistical modelling, adjustments and estimates.

It also puts young people at greater risk of engaging in harmful and risky levels of alcohol consumption¹⁶...

The RACP is relying on a systematic review 'Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008' to make this statement. In addition to the possibility of publication bias inherent in systematic reviews as mentioned above (see critique of NSW ACT Alcohol Policy Alliance), this particular review has included non-peer reviewed papers as part of the review. The papers reviewed were not consistent in methodology meaning that the results of reviewing the results of the research as a whole would not be meaningful.

The review also does not establish a causal link between alcohol advertising and underage consumption.

...and of developing long term alcohol use disorders.¹⁷

The RACP is relying on a study 'Exposure to Alcohol Advertisements and Teenage Alcohol-Related Problems' here. The research referred to does not establish a causal link between alcohol advertising and underage consumption. It is also very limited in scope of participants (only public school students in LA County) and is hence not suitably credible for the inquiry purpose.

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The study referenced, 'Adolescents' exposure to paid alcohol advertising on television and their alcohol use: exploring associations during a 13-year period' does not look at the direct relationship between individual experience of exposure of alcohol advertisement and the individual experience of alcohol consumption. That is, the study does not measure the number of instances that an individual adolescent is exposed to alcohol advertising and compare this to the alcohol consumption outcomes of the same individual.

Instead, it compares two sets of unrelated data that provides no way of showing what individual outcomes are when it comes to exposure to alcohol advertising. As such it is unable to produce a causal link and any associated link should be taken with caution. In addition the study has not taken into consideration any secular factors influencing adolescent alcohol consumption such as parental influence.

2. You've raised the role of parents as key to responsible alcohol consumption, yet 20 per cent of your advertising ends up seen by children. How do you suggest the balance can be restored to parents so their influence can be amplified against exposure to alcohol-related advertising?

Alcohol advertising content and placement is strictly regulated to ensure it doesn't target or appeal to children under 18 so the desired balance described in the questions already overwhelmingly exists.

It is parental influence that plays the most significant role in shaping attitudes towards drinking behaviour so reminding parents of their influence and their responsibility will make significantly more difference than removing advertising that is not causing or exacerbating the problem (of underage consumption).