



Foundation for Alcohol Research & Education

8 January 2018

Reverend the Hon Fred Nile MLC  
Chair Portfolio Committee No. 1 – Premier and Finance  
NSW Legislative Council  
Parliament House  
Macquarie St  
SYDNEY NSW 2000  
PortfolioCommittee1@parliament.nsw.gov.au

Dear Reverend Nile

**NSW ALCOHOL ADVERTISING INQUIRY 2017 QUESTIONS ON NOTICE FARE & NAAPA**

Thank you for providing the Foundation for Alcohol Research and Education (FARE) and the NSW ACT Alcohol Policy Alliance (NAAPA) the opportunity to appear before the Committee and discuss the important issue of alcohol advertising in the New South Wales (NSW) community.

Alcohol is one of the most heavily promoted products in the world and it is encouraging to see that alcohol advertising is becoming a prominent issue on the NSW Parliament's agenda. Alcohol advertising contributes to the normalisation of alcohol use and reinforces the harmful drinking culture that currently exists in Australia.

This inquiry provides the NSW Parliament with the important opportunity to implement comprehensive reforms to strengthen the regulation of alcohol advertising in NSW.

Please find attached the responses to the questions on notice provided to FARE and NAAPA by the NSW Alcohol Advertising Inquiry Committee. FARE as the secretariat of NAAPA has responded on behalf of the Alliance.

Should you have any further questions please do not hesitate to contact Amy Ferguson, Director of Policy and Research at \_\_\_\_\_ or Madeleine Day, Policy Officer at \_\_\_\_\_

or on \_\_\_\_\_ .

Yours sincerely

**MICHAEL THORN  
CHIEF EXECUTIVE  
FOUNDATION FOR ALCOHOL RESEARCH AND EDUCATION  
ON BEHALF OF NAAPA**

## Question 1 – Mr Field – Health benefits of alcohol research

**Ms FERGUSON:** My first point, I would be asking directly to look at that evidence and where that is from. There is some published evidence from Professor Tim Stockwell from his Canadian base and Tanya Chikritzhs from Curtin University in Western Australia which has shown that is not the case, that health benefits from alcohol is not the case at all. There is research to show that the consumption of wine does come with health benefits.

**Mr JUSTIN FIELD:** I think it would be useful for the preparation of the report if specific studies were cited. That could be taken on notice.

**Ms FERGUSON:** There was one published last year and I am happy to provide that to the Committee.

### Research indicating that alcohol harm outweighs any potential benefit

1. Stockwell, T., Zhao, J., Panwar, S., Roemer, A., Naimi, T., & Chikritzhs, T. (2016). Do “Moderate” Drinkers Have Reduced Mortality Risk? A Systematic Review and Meta-Analysis of Alcohol Consumption and All-Cause Mortality. *Journal of Studies on Alcohol and Drugs*.
2. Chikritzhs, T., Stockwell, T., Naimi, T., Andreasson, S., Dangardt, F. & Liang, W. (2015). Has the leaning tower of presumed health benefits from ‘moderate’ alcohol use finally collapsed? *Addiction* 110 (5): 726-727.
3. Chikritzhs, T., Fillmore, K., & Stockwell, T. (2009). A healthy dose of scepticism: Four good reasons to think again about protective effects of alcohol on coronary heart disease. *Addiction* 28: 441-444.
4. Fillmore, K.M., Stockwell, T., Chikritzhs, T., Bostrom, A. & Kerr, W. (2007). Moderate alcohol use and reduced mortality risk: systematic error in prospective studies and new hypothesis.

A copy of these articles are enclosed for the Committee’s information.

### Research on alcohol and cancer

1. Garaycochea, J.I., Crossan, G.P., Langevin, F. et. al. (2018). Alcohol and endogenous aldehydes damage chromosomes and mutate stem cells. *Nature online*. <http://dx.doi.org/10.1038/nature25154>
2. Roswall, N. & Weiderpass, E. (2015). Alcohol as a risk factor for cancer: existing evidence in a global perspective. *J. Prev. Med. Public Health* 48: 1–9.
3. Parkin, DM., et al. (2011). Cancers attributable to the consumption of alcohol in the UK in 2010. *Br J Cancer* 106(S2):S14- S18.
4. Pandeya, N., Wilson, L.F., Webb, P.M., Neale, R.E., Bain, C.J. & Whiteman, D.C. (2015). Cancers in Australia in 2010 attributed to the consumption of alcohol. *Aust NZ J Public Health* 39(5): 408-413.
5. Calculated by the Cancer Research UK Statistical Information Team, based on figures from Parkin DM, Boyd L, Darby SC, Mesher D, Sasieni P, Walker LC. (2014). The Fraction of Cancer Attributable to Lifestyle and Environmental Factors in the UK in 2010. *Br J Cancer*.
6. World Health Organization (WHO). (2014). World Cancer Report. *IARC Press*.
7. International Agency for Research on Cancer. (1988). Alcohol drinking. *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans*. Vol 44.

## Question 2 – The Hon Mr Searle – AIHW Burden of Disease study release date for 2018

**The Hon. ADAM SEARLE:** The Australian Institute of Health and Welfare said it would be publishing a report on the Australian Burden of Disease Study in 2018. Do you have any idea when in 2018?

**Ms FERGUSON:** Not at this stage. We can potentially ask some questions to find out.

**The Hon. ADAM SEARLE:** If you could.

In attachment two of the Australian Institute of Health Welfare's submission to the inquiry it stated that a report on the burden of disease due to alcohol and other drugs will be published early 2018 and that Australia's burden of disease estimates to the 2015 reference year will be released in early 2019.

*"The AIHW will be publishing a report on the burden due to alcohol and other drug use in Australia in early 2018 that will revise and extend estimates previously reported from the ABDS 2011 to draw on the latest evidence of diseases linked to alcohol, and to report estimates by sub-population groups (state/territory, remoteness and socioeconomic group). Results of scenario modelling will also be presented to estimate the potential burden due to alcohol and other drug use in 2020 and 2025 based on current trends.*

*The AIHW is also currently updating Australia's burden of disease estimates to the 2015 reference year, with results expected to be released in early 2019."*

For further information please contact AIHW.

## Question 3 – Reverend Nile – Rates of alcohol-related harm

**The CHAIR:** Can you provide any facts and figures about what you have said? Is that in your submission or is there additional material we should seek out?

**Associate Professor EZARD:** Can we take on notice the rates of alcohol-related harm? I am pleased that the Chief Health Officer has released an annual report on alcohol in this State and has put efforts into getting some epidemiological data for alcohol-related issues in this State. I would be keen to look at more of those harm indices across the State in future publications.

According to NSW Health data, alcohol is responsible for 13,624 emergency department presentations, 53,924 hospitalisations and 1,300 deaths every year in the state.<sup>1</sup>

Alcohol consumption results in both short and long-term harm and is a major contributor to many chronic diseases including diabetes, heart disease, mental health and cancer. Awareness of the association of alcohol and chronic disease is significantly low yet incidence rates are significantly high. In Australia it is estimated that alcohol contributed to 2.3 per cent or 3,200 cancer cases in 2010.<sup>2</sup> In the UK alcohol causes 4 per cent or around 12,800 cancer cases every year.<sup>3</sup>

Information provided by St Vincent's hospital has shown that there has not been a single alcohol-related assault death in the hospital since the last drinks measures came into effect nearly three years ago.<sup>4</sup> [As reported in media](#) in 2016, there were 145 facial trauma patients who received operations at St Vincent's Health Hospital Sydney in the two years before the liquor reforms were implemented in February 2014, compared with 58 patients in the two years after (60 per cent drop).

#### Question 4 – The Hon Mr Farlow – Tasmanian liquor promotion guidelines

**The Hon. SCOTT FARLOW:** Are there other States where shopper docketts are banned from promoting alcohol or offering price promotion discounts?

**Ms FERGUSON:** Not shopper docketts; no jurisdiction has taken up this recommendation. In regards to your price point, the Tasmanian liquor promotion guidelines do have a clause that—I would have to take this on notice to get the exact wording for you—says something along the lines of no less than \$1 a standard drink, or something to that effect. But I certainly can take that on notice and get the exact wording back to you.

In the Tasmanian Liquor Act guidelines for *Advertising and promotion of liquor* extreme discounting is listed as an example of “What could be considered undesirable advertising or promotion?”

The following is an extract from the Tasmanian guidelines:<sup>5</sup>

*“Extreme discounts (50 per cent or more off the full price is an extreme discount and is of concern where rapid or excessive consumption is also encouraged):*

- *Providing free drinks or \$1 shots of spirits for consumption on and/or off the premises.*
- *Discount offers, such as:*
  - *Drink cards, promotional cards or vouchers that encourage stockpiling drinks or consumption over a short period of time; or*
  - *Bulk purchases that result in a liquor product being sold for less than one dollar per standard drink (such as 2 for 1 spirits all night).*
- *Happy hours or other promotions on premises involving extreme discounts that extend for more than two hours.”*

#### Question 5 – The Hon Mr Farlow – Alcohol consumption trends and market growth

**The Hon. SCOTT FARLOW:** In terms of the market and consumption trends, where has the growth in the market occurred? Has it been at the lower end in terms of those cheaper unit prices—like cask wine, for instance, or cheap beer or cheap spirits. Is that where the growth in consumption has occurred?

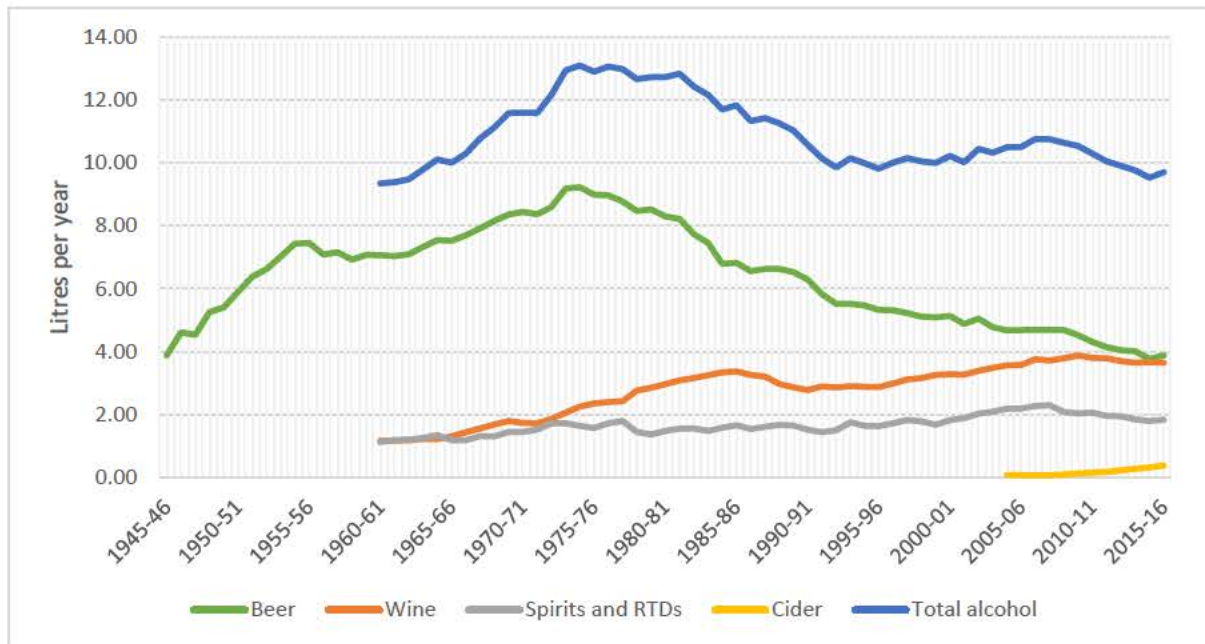
**Ms FERGUSON:** Wine is still the most consumed product, I believe. I can see if I can get that broken down in terms of types of—

**The Hon. SCOTT FARLOW:** If you could take that on notice in terms of the data on price points at which that would be occurring and whether it was occurring in the “goon” category or at the higher end or somewhere else in the market?

According to the Australian Bureau of Statistics (ABS) alcoholic products with an increase in consumption include bottled wine, mid-strength beer and cider (Figure 4 & Table 1).



Figure 1: Australia's per capita consumption of pure alcohol (litres) over a 70 year period.



Note: Litres per person aged 15 years and over.  
 No available consumption data for wine, spirits or total alcohol prior to 1960.  
 No available consumption data for cider prior to 2004.

Source: Australian Bureau of Statistics (2017). Apparent consumption of alcohol, Australia, 2015-16.

According to the 2016 National Drug Strategy Household Survey, bottled wine is the main type of alcohol consumed by drinkers, followed by regular strength beer. Table 1 provides an overview of results from the 2016 National Drug Strategy Household Survey on main and all types of alcohol consumed by drinkers.

Table 1: Main and all types of alcohol usually consumed by recent drinkers<sup>(a)</sup>, 14 years or older (per cent)

Type of alcohol	Main type of alcohol <sup>(b)</sup>		Usual types of alcohol <sup>(c)</sup>	
	2013	2016	2013	2016
Cask wine	3.0	2.7	11.6	9.1
Bottled wine	33.9	34.3	68.3	65.6
Regular strength beer	20.4	19.8	46.1	44.0
Mid strength beer	7.1	7.9	21.1	23.7
Low alcohol beer	4.4	4.0	15.5	13.6
Home-brewed beer	0.5	0.6	3.8	3.8
Pre-mixed spirits in a can	6.1	5.5	24.2	22.3

Bottled spirits/liqueurs	14.7	14.4	54.9	52.7
Pre-mixed spirits in a bottle	4.5	3.5	20.3	17.8
Cider	2.9	4.5	17.3	23.0
Fortified wine/port/vermouth/sherry, etc.	1.3	1.2	12.3	10.5
Other pre-mixed drinks (e.g. beer and wine based)	0.4	0.5	4.0	4.5
Other	0.7	1.1	3.4	4.3

(a) Consumed at least a full serve of alcohol in the previous 12 months.

(b) Respondents could select only one response.

(c) Respondents could select more than one response.

Note: Base is recent drinkers.

Source: NDSHS 2016 & 2013

According to the International Alcohol Control Study, 77 per cent of harmful drinkers are consuming alcohol that costs \$1.50 or less (Table 2). The majority of Australia's drinking population are drinking alcohol that costs \$1.50 or more per standard drink.

Table 2. Consumption distributions by level and price

	\$1.20	\$1.50	\$1.80	>\$1.80
Moderate	31%	18%	14%	36%
Hazardous	27%	32%	15%	25%
Harmful	36%	41%	9%	14%

### Question 6 – Mr Field – Advertising on public transport in other jurisdictions

**Mr JUSTIN FIELD:** Obviously other jurisdictions have looked at this challenge. In particular, the Australian Capital Territory [ACT] has introduced restrictions of advertising of alcohol on public transport and outdoor advertising generally is quite a different regulatory regime. Do you have any information you can provide the Committee on how that has gone, whether or not it has had impacts on consumption, and whether or not it has shifted alcohol advertising in the Australian Capital Territory to other types of advertising?

**Ms FERGUSON:** As the local ACT resident I can. There has not been any public information in terms of the impact on what that restriction has been.

**Mr JUSTIN FIELD:** It was quite recent—2015?

**Ms FERGUSON:** Yes, 2015. As you mentioned, the ACT environment itself is quite different. We do not have outdoor billboards that exist in other jurisdictions. I can certainly look into that.

FARE was not able to find any specific research undertaken about the changes in alcohol consumption, sales or harm following the introduction of an alcohol advertising ban on public buses in the ACT.

For further assistance we recommend the Committee contact Chief Health Officer, Dr Paul Kelly.

FARE and NAAPA recommend that the NSW Government join other jurisdictions and begin the process of banning alcohol advertising and other unhealthy commodities from government owned assets.

Statement from the Government of South Australian:

*“The State Government will move to ban alcohol advertising from buses, trains and trams from 2017.*

The decision follows the *Review of the South Australian Liquor Licensing Act* which found that recent success in increasing average first-time drinking ages for teenagers could be undone by not curbing alcohol advertising.

*Content standards for contracts on Adelaide Metro vehicles will be amended to prevent primary product alcohol advertising from mid-2017.”<sup>6</sup>*

Statement from the Government of Western Australia:

“The ban would include advertising on all Transperth buses, bus stops and train stations.

The move is part of WA Labor’s Plan for Health for everyday West Australians.

Medical research has repeatedly shown there is a direct link between exposure of alcohol advertising and alcohol consumption.”<sup>7</sup>

### **Question 7 – Mr Field – Research on children’s exposure to alcohol advertisements in sport**

**Mr JUSTIN FIELD:** I asked this question of a previous body that gave evidence today. They suggested that given the 75 per cent target within the code to ensure advertising is reaching more than 25 per cent of children in any particular segment, they quoted the figures around sporting broadcasts as being much more around 90 per cent in terms of the adult viewing rate of these programs. They did not see that as much of an issue at all. Do you have any evidence that can challenge that? It does seem like the response; it was quoted by one of the other Committee members. The response from the major sporting codes to this seems aggressive; they see a real risk. There seems to be an unhealthy relationship or reliance on alcohol advertising in connection with sports. They want to be strongly defending that relationship. I am not sure of the evidential basis for the concern around sport.

**Ms FERGUSON:** I know that Kerry O’Brien, a leader at Monash University, has done research into viewing children’s exposure to alcohol advertising during sport to see what the exposure was. I can send that piece of research to the Committee.

**Mr JUSTIN FIELD:** Yes.

**Ms FERGUSON:** I have the figures in front of me: it was an estimated cumulative audience of 26.9 million Australian children and adolescents watching Australia’s major television sporting codes and these were exposed to 51 million incidences of alcohol advertising. This was during 6.00 a.m. and 8.30 p.m. I can send you the research those numbers have come from.

**Mr JUSTIN FIELD:** That would be useful.

#### Exposure to alcohol advertising on children during sport

1. Carr, S. et al (2015) Child and adolescent exposure to alcohol advertising in Australia’s major televised sports. *Drug and Alcohol Review* 35 (4): 406-411.

A copy of this research is enclosed for the Committee’s information.

#### Further evidence of children’s exposure to alcohol advertising during sport

1. O’Brien K, et al. (2011). Alcohol Industry and Non-Alcohol Industry Sponsorship of Sportspeople and Drinking. *Alcohol Alcsm.* 46 (2): 210-213.

2. O'Brien KS, Carr S. (2016) Effective alcohol marketing policy making requires more than evidence on alcohol marketing effects: research on vested interest effects is needed. *Addiction* <http://onlinelibrary.wiley.com/doi/10.1111/add.13489/full> (Impact Factor 4.97)
3. Phillipson L. & Jones S.C. (2007). *Awareness of alcohol advertising among children who watch televised sports*. Proceedings of the Australian and New Zealand Marketing Academy (ANZMAC) Conference, pp.2803-2810.
4. Jones S.C., Phillipson L. & Barrie L.R. (2010). 'Most men drink... especially like when they play sports': Alcohol advertising during sporting broadcasts and the potential impact on child audiences. *Journal of Public Affairs*, 10 (1-2), 59-73.
5. Pettigrew S, et al. (2013). Game on: do children absorb sports sponsorship messages? *Public Health Nutrition* (1):1-8.
6. Zhou, J., O'Brien K.S., & Heim, D. (early view online). Sports and spirits: mixing alcohol consumption, identity, and happiness. *Alcohol & Alcoholism*

#### **Question 8 – Supplementary question for FARE**

Does the Code effectively deal with changes in alcohol-related advertising such as digital media, social channels, text messaging, sports sponsorship? Is it keeping pace with technology, evolving industry tactics and community expectations?

No. Despite the Alcohol Beverages Advertising Code (ABAC) being recently updated to include rules surrounding the placement of alcohol ads, the code still fails to adequately protect children. Under the Code sponsorship is not even considered to be a form of advertising meaning that it is not regulated at all. Furthermore, the new placement rule states that alcohol ads can only be placed where the audience is at least 75 per cent adults, yet ABS data shows that only 22 per cent of the population are children with less than 10 per cent aged 10-17 years. This new placement rule was never intended to restrict any marketing channels. It is merely an industry tactic to make it look as though there are appropriate rules in place.

The ABAC only applies to advertising during programs that are 'directed primarily to children'. This fails to include not only sport but programs such as Master Chef, Modern Family and the Simpsons which are popular among children. Despite the ABAC regulating content and placement of alcohol ads, upholding the code is voluntary as businesses need to be a signatory. Even then, no meaningful sanctions are imposed for noncompliance, making the regulation redundant.

It does not keep up with evolving technology but instead takes advantage of significant gaps in the self-regulatory system. Social media channels can be shared or forwarded to those underage, age gating can be easily falsified, as well as different media platforms having different guidelines.

It is clear that the alcohol industry under the ABAC code cannot regulate its own products due to their considerable vested interests. It is up to government to provide clear regulation and accountability.



*Case study: Advertising Standards Authority (UK) and Diageo's Captain Morgan Snapchat lens*

Since 1 January 2013 there have been 269 rulings on alcohol advertising complaints in the United Kingdom (UK). Of these 224 were upheld and 11 upheld in part, meaning 83 per cent of complaints were upheld in full.<sup>8</sup>

In comparison, since 1 January 2013 there have been 160 rulings by ABAC on alcohol advertising complaints in Australia with only 33 upheld.<sup>9</sup> This means that ABAC only upheld 21 per cent of complaints compared to the Advertising Standards Authority (ASA) 83 per cent.

The most recent complaint upheld by ASA was Diageo's Captain Morgan Snapchat lens.<sup>10</sup> The paid lens was seen in June 2017 and featured a cartoon pirate that turned the users face into Captain Morgan, with two glasses of rum and coke clinking together and voice-overs of "live like the Captain" and people cheering.

The ASA felt that the advert was of particular appeal to people under 18 and was directed at people under 18. This was based on the premise that the child-like cartoon of a pirate would very likely appeal to those under 18 and the lack of adequacy surrounding age gating mechanisms.

As part of ASA's decision they cited Ofcom research from 2016 that showed despite Snapchat having a minimum used age of 13, 34 per cent of children aged 8 to 11 years used Snapchat. Based on this information ASA felt that it was not possible to control who viewed the Captain Morgan lens and therefore it was likely that the ad could be seen by those under 18. This decision was upheld on 3 January 2018 and has resulted in Diageo suspending the use of Snapchat advertising internationally.

This example of Diageo suspending use of Snapchat advertising internationally provides a clear case study as to why the ABAC system is not adequately regulating alcohol advertising on social media platforms.

### **Question 9 – Supplementary question for NAAPA**

*We've heard claims from the alcohol industry today/we've seen claims from the alcohol industry in submissions that any exposure of children to alcohol advertising is incidental and children are not the target market for such advertising? In your opinion is this credible? Have children been the target for alcohol adverts in Australia or overseas?*

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.<sup>11</sup> The entire premise of alcohol advertising is contrary to community health standards. Vulnerable groups, including children, are the object of direct marketing strategies to promote alcohol, however, a lack of transparency regarding the alcohol industry's marketing strategy limits research on which groups and in what ways groups are targeted.<sup>12</sup>

The alcohol industry claims that their advertising is intended to encourage existing drinkers of legal drinking age to switch products, rather than encourage excessive drinking or non-drinkers to drink. Yet industry documents reveal a different story where brands have used market research data on 15 and 16 year olds to guide campaign development, target their products and advertising to attract new drinkers and encourage people to drink early and drink often.<sup>13</sup>

It is clear the current system of self-regulation is ineffective. We have seen countless examples of alcohol marketing occurring during children's programming, games and sporting events. These examples are outlined below.

*Example 1: Wild Turkey ad during G and PG movies on QANTAS inflight entertainment<sup>14</sup>*

The video advertisement was seen by the complainant before G and PG rated films on the in-flight entertainment system on board a Qantas interstate flight from Sydney to Perth on Sunday 23 September 2017.

The complainant provided photos of a Wild Turkey ad before 'The Lego Batman Movie' (PG), 'The Boss Baby' (G), 'Dance Academy: The Movie' (PG) and 'My Life as a Zucchini' (PG). The images provided by the complainant featured a glass with ice on a bar and bourbon being poured in from a bottle of Wild Turkey.

*Example 2: Crown Lager ad on 'Bratz' game website<sup>15</sup>*

A 30 second Crown Lager advertisement appeared on a 'Bratz' game website, playing before children could access the 'My Little Pony' game, which is aimed at 3-8 year old girls. January 2012.

*NOTE: In February 2012, an advertisement for Hahn Super Dry appeared in the same location on the 'Bratz' game website.*

*Example 3: Great Northern ad during 'The Block'<sup>16</sup>*

This is a TV program which is targeted at families. It is expected and it is known that a large number of children watch this program.

*Example 4: Alcohol sponsorship or sport*

Children are exposed to countless advertisements and promotions of alcoholic beverages while watching sport. The most prominent and pervasive exposure is the NSW Blues State of Origin team sponsored by Victoria Bitter (VB). Kids not only see their sporting heroes dressed in alcohol company logos but they too are wearing jerseys branded with alcohol logos. Although child sized merchandise does not display the VB logo it is well known that many young kids wear smaller adult sizes that display the logo. The marketing is so pervasive that the team itself is called the VB Blues. The following images provide examples of alcohol sponsorship of sport.

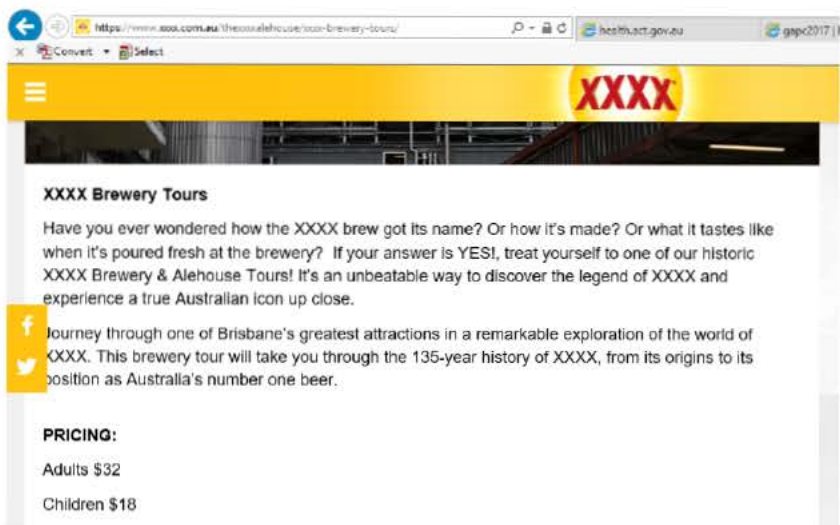






**Example 5: XXXX Brewery Tours**

School groups are frequently taken on tours of the XXXX Brewery. Their website even has child pricing for the tours yet the website itself is age gated requiring you to be over 18 to visit the site. The below is an excerpt from the XXXX website promoting the tours.



## The global alcohol industry

The alcohol industry is a global industry dominated by huge multinational corporations. It is important to remember that Bundaberg Rum is not a small local Bundaberg distillery, it is owned and operated by Diageo, an international conglomerate based in the United Kingdom. The alcohol industry uses unscrupulous tactics to undermine public health policy by creating doubt and manipulating public opinion through the illusion adverse business impacts as seen in Case Study 1.

### *Casey Study 1: Bundaberg Rum*

#### **Bundaberg Rum boss slams Queensland liquor laws**

24/10/2017

Bundaberg Distilling Company Chair Kylie McPherson has slammed Queensland's liquor laws, saying they discriminate against local distillers.

The Queensland Government introduced new laws on pre-mixed drinks in 2016 that banned the sale of pre-mixed drinks with more than 5% alcohol after midnight, plus shots and cocktails not listed on a menu.

"This ban unfairly targets a local Queensland industry," she told [The Courier Mail](#). "The law says that after midnight

The alcohol industry uses the same tactics to cast doubt over the effectiveness of advertising restrictions. Arguments have been made to the Committee by numerous members of the alcohol industry that advertising restrictions are already effective and any further regulation would be unnecessary and burdensome. For example Diageo's submission states that "self-regulation of alcohol marketing as the most effective approach to maintaining high standards of responsible marketing." However, it is evident from the submission made to the Committee by members of the medical and public health sectors that this is inherently not the case. The alcohol industry is self-serving and has vested interests that are clearly at odds with public health and community wellbeing.

Although some argue that the self-regulatory system is satisfactory, in reality industry is manipulating a system riddled with loopholes to maximise their advertising exposure to anyone no matter their age. Outdoor advertising and sports sponsorship are such examples of this. In other lower-middle income countries where there is no alcohol advertising regulation or a system of governance able to effectively enforce such regulation the alcohol industry's tactics are even more despicable (see Case Studies 2 – 4). Under the guise of "corporate social responsibility" the alcohol industry exploits communities for their own marketing benefits. The alcohol industry cannot be trusted to self-regulate.

### *Casey Study 2: South African Breweries Limited*

SAB (South African Breweries Limited) controversial Beers for Africa campaign was removed following great public protest. SAB is a subsidiary of AB-InBev. Only 35 per cent of South Africans drink but of those that do nearly half (45.4 per cent) are heavy episodic drinkers.

This marketing ploy is a blatant disregard for South African public health as it exploits poorer communities at the benefit of multinational corporations and the detriment of local community health and welfare.



*Casey Study 3: Guinness (Diageo) school education and responsible drinking campaigns*

Diageo has been running Guinness sponsored education campaigns about ‘responsible drinking’ around the world.

In Ghana an underage drinking program was run by Guinness in schools and universities. The conflict of interest sparked concern from public health groups who lobbied the Ghana Government to cease the partnership with Diageo.

In Nigeria Guinness partnered with the National Youth Services Corp. Diageo also runs similar programs in Ireland and other countries.

Alcohol companies should not provide education campaigns due to their inherent vested interests.



*Casey Study 4: Carlsberg’s sponsorship of the Rugby Rumble Festival*



In Sri Lanka alcohol advertising is prohibited yet the alcohol industry employs deceitful tactics to market their products regardless. Carlsberg's sponsorship of the Rugby Rumble Festival is such an example. The festival is a tournament to celebrate the bygone years of school rugby seeing numerous school teams invited to watch or participate.



#### Question 10 – Supplementary question for NAAPA

Does the evidence show there any channels of exposure to alcohol advertising that are more harmful to children than others?

There are clear loop holes in the ABAC and other industry codes that allow particular forms of advertising to go completely unregulated. The most problematic is alcohol sponsorship of sport, as sponsorship is not even considered as a form of advertising despite its clear marketing value. Another highly problematic medium is outdoor advertising as it is impossible to control who can and cannot see it.

#### Problem with sports sponsorship and advertising

Sport's sponsorship and advertising results in highly concentrated exposure. In the Australian Open Final there were 777 visible instances of alcohol advertising with the rate of exposure 3.8 ads per minute.<sup>17</sup> 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.<sup>18</sup> This means that the more alcohol advertising young people are exposed to, the earlier they will begin to drink, and the more they will consume if they already drink.

An Australian study of 164 children aged 5 to 12 years found that 76 per cent were able to correctly match at least one sport with its relevant sponsor.<sup>19</sup> 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.<sup>20</sup>

#### Problem with outdoor alcohol advertising

Public transport and outdoor advertising has no restrictions and can be seen by people of all ages. This is extremely problematic for alcohol advertising as it means children are being exposed to advertising for a product they cannot legally consume.

The advertising industry has described outdoor advertising as “always on, delivering messages 24 hours a day, seven days a week”.<sup>21</sup> It cannot be switched off and the entire community is exposed to it making it impossible to control who sees alcohol ads. Children and young people are extensively exposed to this type of advertising, particularly on public transport.

About half of all secondary school students in Australia travel to and from school at least once a week on public transport.<sup>22</sup> On an average weekday in Sydney young people aged 11-20 make 205,000 trips by train and 175,000 trips by public bus.<sup>23</sup> An audit of ads at train stations in Sydney found that 27 per cent of unique advertisements were for alcohol.<sup>24</sup>

## References

- <sup>1</sup> New South Wales Health (2017). NSW health stats. Retrieved from: [http://www.healthstats.nsw.gov.au/IndicatorGroup/indicatorViewList?code=beh\\_alc&topic=topic\\_alcohol&name=AlcoholTopic](http://www.healthstats.nsw.gov.au/IndicatorGroup/indicatorViewList?code=beh_alc&topic=topic_alcohol&name=AlcoholTopic)
- <sup>2</sup> Pandeya, N., Wilson, L.F., Webb, P.M., Neale, R.E., Bain, C.J. & Whiteman, D.C. (2015). Cancers in Australia in 2010 attributed to the consumption of alcohol. *Aust NZ J Public Health* 39(5): 408-413.
- <sup>3</sup> Parkin, DM., et al. (2011). Cancers attributable to the consumption of alcohol in the UK in 2010. *Br J Cancer* 106(S2):S14- S18.
- <sup>4</sup> Data obtained from St Vincent’s Hospital
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