

4 June 2013

Committee Secretariat
Legislative Council – Committees
Parliament House
Macquarie Street
SYDNEY NSW 2000

Dear Sir/Madam

QUESTIONS ON NOTICE – INQUIRY INTO STRATEGIES TO REDUCE ALCOHOL ABUSE AMONG YOUNG PEOPLE IN NSW

The AANA is pleased to provide its response to the questions on notice raised during the hearing on 6 May 2013.

1. Transcript for correction

This was forwarded under separate cover on 27 May 2013.

2. ASB Community Research

A link to the 2012 Community Research document was provided by the Advertising Standards Bureau (ASB) in its correspondence to you dated 21 May 2013.

3. Advertising Criteria

The ASB also provided you, under cover of the same correspondence, copies of its advertisements calling for expressions of interest in Board membership. The website advertisement detailed the matters to which applications were to have regard in lodging their applications.

4. Alcohol advertising spend as a proportion of total ad spend

AANA is unable to provide this information as it is not publicly available and is held commercial-in-confidence.

5. Audience viewing numbers: total and 13-17yo

Overall audience viewing data shows that adults comprise the vast majority of people watching commercial free to air television, AANA provides the following additional detail:

- After 8.30pm, only 4.1% of the total viewing audience is comprised of 13-17 year olds;
- The vast majority of those 13 – 17 year olds are watching with an adult. Of the total viewing audience, only 1.4% of 13-17 year olds are watching television without an adult.

The situation is similar with live sports viewing before 8.30pm:

- Across the main live sports broadcast before 8.30pm, the number of children aged 13-17 ranged from only 2.0% (rugby union) to 5.1% (soccer) of total viewers.
- Of the total viewing audience of live sport broadcast before 8.30pm, the number of 13-17 year olds viewing without an adult ranged from 1.0% (rugby union) to 3.4% (soccer).

And for live sports viewing post 8.30pm:

- Across the main live sports broadcast after 8.30pm, the range of children aged 13-17 years viewing was from 2.6% (cricket) to 4.8% (AFL) of total viewers.
- The number of 13-17 year olds viewing live sports after 8.30pm without an adult ranged from 0.9% (rugby union and cricket) to 1.5% (AFL and soccer).

6. Age-gating

AANA refers to the comments in the IAB's submission to ANPHA's inquiry - Alcohol Advertising: The Effectiveness of Current Regulatory Codes in Addressing Community Concerns. IAB's submission notes that portal websites have a range of advertiser policies, including that the advertisements are targeted to an 18+ audience and the right to remove advertisements that do not meet community standards or is the subject of a complaint.

More specifically, Facebook's policies, tools and reporting infrastructure detail a range of requirements for alcohol advertisers. Alcohol branded content is not visible to people under the age of 18 in Australia. This content is age-gated to prevent sharing of alcohol branded pages with under 18s. That is, if an alcohol branded page is sent to a 16 year old friend then Facebook will prevent the 16 year old from viewing the page and will revert to the user's newsfeed page.

Advertisers on Facebook must agree to specific terms and conditions when either submitting an advertisement on Facebook or creating a Facebook page. Facebook also has developed guidelines that govern all advertising on its site. Facebook Page Terms require people to restrict access to Pages (through its age-gating functionality) as necessary to comply with applicable laws and Facebook policies.

Facebook's advertising guidelines include the requirement that alcohol advertising must comply with additional provisions, specifically that an alcohol ad may only be targeted at Australians who are 18 years and older and such ads must apply age and country targeting criteria.

7. Supplementary question: Given the limitations with self-regulatory codes, do you believe that the alcohol industry is doing enough to limit and protect young people from alcohol advertising?

The AANA submits that the self-regulatory codes are not limited. To the contrary, the codes are technology neutral and are in keeping with prevailing community standards. Increasing compliance with the codes is evident from the declining number of breach findings by the Advertising Standards Board in relation to complaints about alcohol advertising.

Your sincerely

 **Acting Chief Executive Officer, AANA**