

**Submission
No 16**

**INQUIRY INTO ALCOHOLIC BEVERAGES ADVERTISING
PROHIBITION BILL 2015**

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Burnet Institute
Medical Research. Practical Action.

DIRECTOR and CEO – Professor Brendan Crabb AC PhD
CHIEF PATRON – The Honourable Linda Dessau AM, Governor of Victoria

INQUIRY INTO ALCOHOLIC BEVERAGES ADVERTISING PROHIBITION BILL 2015

November 10, 2017

Dear Revd the Hon Fred Nile MLC

Please find enclosed our submission to the to the inquiry into a proposed Alcoholic Beverages Advertising Prohibition Bill.

Burnet Institute is an Australian, unaligned, not-for-profit, independent organisation that links medical research with practical action to help solve devastating health problems. Our mission is to achieve better health for vulnerable communities in Australia and internationally by accelerating the translation of research, discovery and evidence into sustainable health solutions.

Prohibition of alcohol advertising is an evidence-based policy that will reduce harms from alcohol consumption. This submission summarises the results of our own research into alcohol advertising on social media. Social media provides a powerful channel for alcohol brands to reach and engage with young people. As our research shows, current regulations are insufficient to address this. It is essential that social media promotions be considered in any changes to alcohol advertising regulations.

I would be happy to speak further about our research in this field.

Kind regards

Dr Megan Lim

Head of Sexual Health and Young People's Health Research

Burnet Institute

85 Commercial Rd, Melbourne, 3004

Head Office

85 Commercial Road, Melbourne, Victoria, Australia 3004
GPO Box 2284, Melbourne, Victoria, Australia 3001

Tel +61 3 9282 2111 **Fax** +61 3 9282 2100 **Email** info@burnet.edu.au burnet.edu.au

Alcohol advertising on social media

Social media, and specifically Facebook, provide companies with opportunities that differ from conventional forms of advertising. In addition to paid advertising, companies are able to pursue direct conversations with their audiences, enabling them to adapt and customise their messaging to the values, identities and cultural practices of their networks (1, 2). Alcohol companies have recognised these advantages and are encouraging interactions with their audiences to increase their exposure through user-generated content, incorporating their brands into the everyday lives of young people (2). As a result, users become actively involved in both promoting and producing branded content across their networks.

This advertising is expected to comply with the Facebook Advertising Policies (3) and any relevant local regulations – in Australia this refers to the Alcohol Beverages Advertising Code (ABAC). Both of these guidelines prohibit the portrayal of consumption of alcohol as causing or contributing to the achievement of personal, intellectual, business, social, sporting, physical, sexual, or other success (3, 4). Due to the large volume of content generated by companies and users themselves on Facebook, an inability to penalise breaches of the code and slow responses to complaints (5), there is evidence that current alcohol advertising does not always comply with these regulations (6). The application of regulations to user generated alcohol advertising content is unclear.

The Burnet Institute has conducted a series of studies investigating alcohol advertising on social media.(7-9)

Study 1: Who 'likes' alcohol? Young Australians' engagement with alcohol marketing via social media and related alcohol consumption patterns

This study was a survey of 1001 Australians aged 15-29 years.(7) It found that liking or following alcohol pages on social media was common and that it was associated with increased alcohol consumption.

A quarter (24.9%) liked at least one alcohol social media page, most commonly brands of spirits, cider and alcohol retailers. Alcohol marketing social media use was significantly and independently associated with male gender, living in a non-major city, ever using illegal drugs and early age of first alcohol consumption (all $p < .05$). Alcohol marketing social

media use (OR 2.1, 95% CI 1.5-2.8, $p = <.001$) was independently associated with higher categories on the AUDIT-C, indicating riskier alcohol consumption.

Participants aged 15-17 were equally as likely as older participants to like or follow alcohol marketing pages, despite social media restrictions designed to prevent underage participants from accessing alcohol marketing on social media. These restrictions vary between social media sites; on Facebook, for example, official alcohol marketing pages and advertisements are only allowed to be visible to users over the legal alcohol consumption age(10, 11) (varying by country), while on Twitter users are required to enter their date of birth in order to follow an alcohol brand.(12) Therefore, in theory, official alcohol marketing pages should only be visible to social media users aged 18 years or older in Australia. However, our findings that underage users access alcohol marketing content on social media are consistent with previous studies of Facebook, Twitter and YouTube.(13-15) showing that these age verification measures are not preventing underage users from accessing alcohol marketing pages. It is possible that some of our underage participants were referring to unofficial (i.e. user-led) alcohol marketing social media pages which are common(16) and are not subject to the same restrictions, falsifying their birthdates when setting up social media profiles, or not responding to the question accurately.

- This research shows that alcohol branded content on social media is associated with risky drinking behaviour and that new strategies are needed to ensure that young Australians (<18 years) are not able to engage with promotions via social media.

Study 2: An investigation of strategies used in alcohol brand marketing and alcohol-related health promotion on Facebook

This study was a systematic review of alcohol brand content on Facebook.(8) Alcohol brands were found to be highly popular among Australian Facebook users; the median number of followers of alcohol brands was 25 times greater than the median number of health promotion followers.

Alcohol brands were taking advantage of the ability of Facebook to send time and day specific content and calls to drink. Brands also used strategies in conflict with ABAC, such as linking alcohol consumption to sporting and social success.

One particular concern is that the second most popular Facebook health promotion page, 'How to Drink Properly' is produced by DrinkWise, Australia's alcohol industry-funded organisation that provides alcohol-health information as one of its functions. Social media users may not be aware of links between these organisations and the alcohol industry, and the potential questions raised around the credibility of the information it provides.

- This study shows that Facebook alcohol promotions are highly successful in reaching fans and followers.

Study 3: 'A Drink That Makes You Feel Happier, Relaxed and Loving': Young People's Perceptions of Alcohol Advertising on Facebook

In an online cross-sectional survey with 172 Australians aged 16-29 years recruited from a market research website and via Facebook, we compiled advertisements from six popular alcohol brands' Australian Facebook pages and asked respondents for their perceptions and interpretations in open and closed-ended questions. (9)

This research shows that young people themselves noted themes that are in conflict with ABAC on social media advertisements, such as success, particularly social success, and a significant improvement in mood.

Example quotes from respondents include; *"drinking is a social event and aids in the betterment of your social status"*, *Perfect to be enjoyed in any occasion with the people you love"*, *"For fun times with friends"*, *"Party drink, fun and social"*, *"Be young and party"*, *"Drinking Smirnoff will make your life fun!!"* *"A drink that makes you feel happier, relaxed, and loving"*

Social success was the main unprompted theme that was identified by young people across all three age groups in response to the advertising, particularly in relation to family and friend get-togethers and partying. Themes identified in the advertising were also commonly related to mood enhancement, including increased happiness, having fun, enjoying yourself and feeling more relaxed. This implies that alcohol advertising on social media is not conforming to current ABAC guidelines.

Underage 16- and 17-year-olds in our study were more likely to perceive positive prompted themes in the advertising than older respondents. Proportionally more 16- and 17-year-olds

thought the advertising suggested alcohol would improve your mood, make you more confident and outgoing and feel more relaxed than the older age groups. This finding supports previous research showing that younger people are particularly responsive to the portrayal of drinking alcohol in relation to success (17). Participants also stated that younger adolescents were more likely to engage with alcohol advertising on Facebook than older adolescents, both for the status and as a forum in which they can participate in discussions around alcohol.

- This study shows that Facebook alcohol promotions are not adhering to the Alcohol Beverages Advertising Code (ABAC).

Other key issues in alcohol advertising regulation

There are several other key issues in current Australian alcohol advertising that we are sure will be addressed by responses from other stakeholders. We would like to briefly comment on these to lend our support to the importance of these issues.

Self-regulation of alcohol industry

The Alcohol Beverages Advertising Code (ABAC) is a voluntary code managed by the alcohol industry. Responsibility for monitoring brand-generated alcohol advertising largely falls on consumers, who can submit complaints to ABAC, who will then review the content; however, ABAC dismisses most complaints. There is extensive international evidence showing that self-regulation is ineffective.(18-20)

Alcohol advertising in sport

Alcohol is heavily advertised during sporting events. Current loopholes that allow alcohol promotion during sporting events, at times and places which target children and young people need to be closed.(21)

Public transport advertising

Public transport advertising represents a significant source of exposure for young people. In Melbourne, 39% of journeys to high school and 52% of journeys to tertiary education are made using public transport.(22) Younger people use public transport frequently and are far more likely to use public transport as their main form of transportation than older people.(23)

Alcohol advertising is common on public transport and related infrastructure. For example, an audit of Perth bus stops found that alcohol was the most commonly identified product category advertised, accounting for 23% of all advertisements.(24)

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