

**Submission
No 29**

INQUIRY INTO ALCOHOLIC BEVERAGES ADVERTISING PROHIBITION BILL 2015

Organisation: Australian Council of Children & the Media

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SUBMISSION TO THE NSW LEGISLATIVE COUNCIL INQUIRY INTO ALCOHOL ADVERTISING 2017

Introduction: The Australian Council on Children and the Media is a national not-for-profit membership-based organisation whose mission is to support families, industry and decision makers in building and maintaining a media environment that fosters the health, safety and wellbeing of Australian children.

Its patrons are Baroness Susan Greenfield and Steve Biddulph.

The ACCM has a national Board representing the states and territories of Australia, and a broad membership of organisations and individuals who support its mission.

The ACCM's core activities include the collection and review of research and information about the impact of media on children's development, and advocacy for the needs and interests of children in relation to the media.

Comments on the issues

The Australian Council on Children and the Media submits the following comments in regard to sub-paras (a) (i) and (ii) of Clause 4 of the Bill before the NSW Parliament.

Viz, Clause 4 states the purposes of the proposed Act as the following: (a) the discouragement of alcohol consumption by: (i) persuading young people not to drink and not to abuse alcoholic beverages, (ii) limiting exposure of young people and children to persuasion to drink alcoholic beverages

1. Alcohol's adverse impacts on the developing brain

ACCM has long supported parents' and children's professionals' concerns about the growing exposure of children and underage youth to alcohol promotion. Such concerns are based on the known adverse impacts of alcohol consumption on the developing brain.

As researchers Babor et al (2016) put it

These [international] prohibitions [on underage drinking] are based soundly on a demonstrable biological vulnerability that shows that the brain is not biologically mature until early adult life.... The brain evolves throughout adolescence and into early adult life. The impulsiveness and risk-taking evident in many adolescents, coupled with the relatively late development of critical faculties, has a neurochemical substrate. The architecture and activity of the brain are very malleable over these years, and alcohol can impair successful maturation. This makes the young person uniquely vulnerable to the blandishments of marketing in all its forms

<http://onlinelibrary.wiley.com/doi/10.1111/add.13626/full>

2. Alcohol ads influence both consumption and choice

ACCM's reviews of research show that alcohol ads influence not only consumption, but also brand choice among underage youth, and the brands most popular with under age youth have ads with elements that appeal to that age group. (see references below)

3. Alcohol ads linked to sport

Promoting healthy choices and stronger voices in children's media

Australian Council on Children and the Media

Patrons: Steve Biddulph Baroness Susan Greenfield
Pres: Elizabeth Handsley; Vice-Pres: Amelia Joyce; Hon CEO: Barbara Biggins, OAM

ACCM has objected in the past to the linkage of alcohol with sports. Of particular present concern is the fact that the FreeTV Code allows alcohol ads in sporting events over weekends (which start from 6pm Fridays). [see Code extract below]. So watching the footy with the family can be a health hazard.

As an aside, sports betting ads on TV have been the subject of persistent complaint, and it is a matter of some concern to ACCM that the Federal Government's agreement to minimise these when children and young people were watching will not take effect till March 2018.

https://www.communications.gov.au/sites/g/files/net301/f/factsheet_gambling_advertising.pdf

4. The promotion of alcohol is widespread and varied

Ways of attracting underage youth to alcohol are expanding in the online environment and of concern are advergaming that engage attention more than TV ads. (Advergaming is used by companies to advertise (usually to children) their products by engaging them in an online game that involves characters/ images associated with the product.)

Surveys have shown that children who had played advergaming report significantly more positive brand attitudes compared to children who had watched TV ads.

CONCLUSION ACCM finds that children and youth are put at risk and influenced adversely by exposure to wide spread and careless promotion of alcohol, and to date, that little effective action has been taken to mitigate these impacts. ACCM commends these brief points to the Council in its consideration of this Bill.

Barbara Biggins OAM
Hon CEO

For further information about the content of this submission please contact Barbara Biggins at admin@childrenandmedia.org.au

Extract from Code of Practice for Commercial TV stations 2015

6.2.1

A Commercial for Alcoholic Drinks may be broadcast at any of the following times:

a) in the M [starts 7.30pm] and MA15+ [8.30pm] classification zones set out in Section 2 (except between 5.00am and 6.00am, and 7.30 pm and 8.30 pm); and

b) as an accompaniment to a Sports Program on a Weekend [starts at 6pm on Fridays] or a Public Holiday; and

c) as an accompaniment to the broadcast of a Live Sporting Event broadcast simultaneously across more than one licence

area, if one of subclauses (a) or (b) is satisfied for:

i. the licence area in which the Live Sporting Event being broadcast is held, for an event taking place in Australia;

ii. the majority of metropolitan licence areas in which the Live Sporting Event is shown, for an event taking place overseas

References and annotated relevant citations

Alcohol consumption and young people

<http://onlinelibrary.wiley.com/doi/10.1111/add.13626/full>

The risks of alcohol consumption in young people are well recognized and are reflected in various forms of 'permitted age' legislation around the world, including regulations and industry self-regulations on exposure of children and adolescents to alcohol marketing. It is now clear that these prohibitions are

based soundly on a demonstrable biological vulnerability that shows that the brain is not biologically mature until early adult life.... The brain evolves throughout adolescence and into early adult life. The impulsiveness and risk-taking evident in many adolescents, coupled with the relatively late development of critical faculties, has a neurochemical substrate. The architecture and activity of the brain are very malleable over these years, and alcohol can impair successful maturation. This makes the young person uniquely vulnerable to the blandishments of marketing in all its forms.

Popular brands have ads with elements that appeal to under age youth
<http://www.tandfonline.com/doi/abs/10.1080/08897077.2015.1023485>

Brand choice

These findings suggest that alcohol advertising influences an important aspect of drinking behavior – brand choice – among youth who consume alcohol

<http://www.tandfonline.com/doi/abs/10.3109/00952990.2015.1085542>

Exposure to alcohol ads in sport

<http://onlinelibrary.wiley.com/doi/10.1111/dar.12326/abstract>

links between online marketing and drinking

<http://pediatrics.aappublications.org/content/early/2016/01/05/peds.2015-2149>

and

<http://onlinelibrary.wiley.com/doi/10.1111/add.13591/full#add13591-bib-0018>

Youngsters in four European countries reported to be exposed frequently to on-line alcohol marketing. Results: adjusting for relevant confounders, higher reported exposure to on-line alcohol marketing was significantly associated with expecting to drink alcohol and actual drinking in the previous 30 days. This effect was found to be consistent in all four countries

The association between marketing exposure and adolescents' alcohol expectancies and drinking was robust and seems consistent in several national contexts

influence of advergames

<http://www.tandfonline.com/doi/abs/10.1080/02650487.2017.1349029>

children ranging between 6 and 14 years old, the influence of passive exposure to TV advertising is compared to active exposure to an advergame. In addition, the potential moderating effect of age is explored. In a between-participants experiment, Flemish children were randomly assigned to watch a TV ad, play an advergame, or a no marketing control condition. Results revealed that children who had played the advergame reported significantly more positive brand attitudes compared to children who had watched the TV ad and children in the no advertising exposure control group. Children's pester intent was significantly higher for the advergame compared to the TV ad, but not compared to the no advertising exposure control group. The findings further showed that children's attitudes towards the ad format mediate the impact of the advertising format on pester intent. The advergame was indirectly more persuasive than the TV ad since children reported more positive attitudes towards the advergame compared to the TV advertisement. Moreover, this mediation effect did not differ by children's age. Persuasion knowledge did not mediate the influence of the advertising format on pester intent since children's persuasion knowledge was not significantly related to pester intentions regardless of children's age.

Empowering students to respond to alcohol ads

<http://onlinelibrary.wiley.com/doi/10.1111/1753-6405.12459/abstract;jsessionid=4C1DC289BD8BDAD9EE12CA3973A651D8.f01t02?userIsAuthenticated=false&deniedAccessCustomisedMessage=>