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11th October 2024

Free TV Australia

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Dear Free TV Australia,

This submission is in response to the public consultation on the draft ‘*Commercial Television Industry Code of Practice*’ (the Code).

We are academic researchers from La Trobe University’s Centre of Alcohol Policy Research (CAPR) and run CAPR’s research stream on *Alcohol, Media, and Emerging Technology*. In our work, we have extensively researched how common alcohol is in media and the impact of alcohol exposure on subsequent alcohol use.¹ For example, we have developed and tested AI tools to better estimate how common alcohol references are in popular music, social media posts, and films to offer policy solutions.² From our ongoing analysis of millions of social media posts from top influencers, we have identified that a large proportion of posts that appear to contain sponsored alcohol content do not include a declaration of sponsorship. We have also meta-analysed the research looking at the link between exposure to alcohol in social media,³ music,⁴ and films and found that those who report greater exposure are at risk of drinking more.⁵ Based on our research, we offer recommendations on the proposed changes that may impact alcohol use and harms.

Alcohol use is an ongoing public health concern and causes substantial harm to society. It is considered ‘the most harmful drug’ in Australia.⁶ Worldwide, alcohol use contributes to over three million deaths per year and is the leading cause of hospitalisations and sixty different diseases⁷. Australians consumed four times more alcohol (per capita) compared to the global average in 2016, costing the Australian society \$183 million each day.^{8 9 10} Reducing alcohol use is a clear national and international priority, however, this remains difficult due to alcohol’s omnipresence in popular media, such as television, and the link between exposure and alcohol use.¹¹ Some research has found that exposure to alcohol use from media can impact the effectiveness of alcohol interventions.

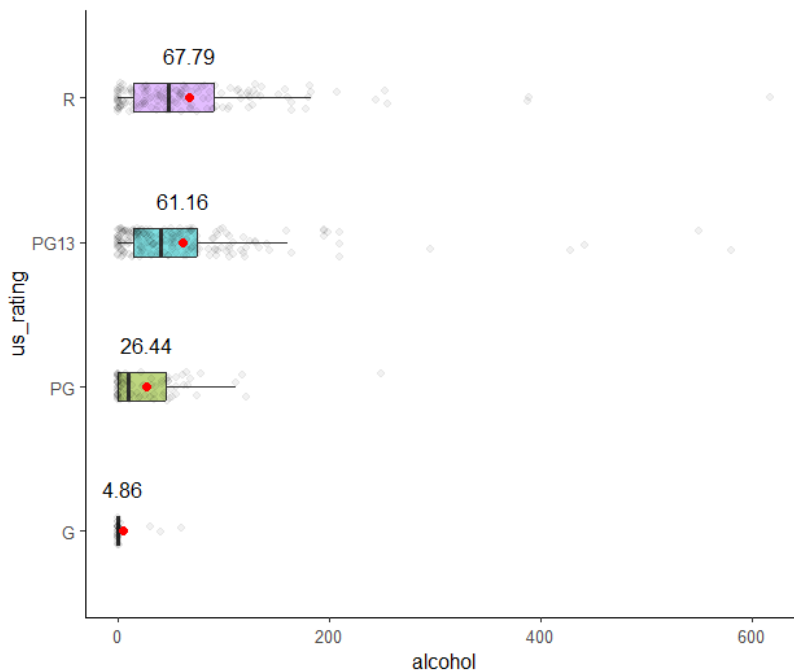
The proposed changes to the Code will increase ‘M’ rated programming and related advertising by removing restrictions on weekends and school and public holidays. This is in addition to existing loopholes in the Code that enables alcohol marketing during live sports broadcasts on weekends and public holidays.

1. We strongly oppose the proposed changes to the M Classification zone in 2.2.2 of the Code because it will increase exposure to alcohol.

Our research has found that all films tend to have a high number of alcohol references (80% of all films depict alcohol).^{12 13 14} However, films with more restrictive classifications (like M) have significantly more alcohol than those classified suitable for a general audience (G or PG films). From our analysis of Australian data, almost 40% of G films showed alcohol, and over 80% of PG films.⁶ Although we have not yet analysed M films, we anticipate that there will be a similar trend as the American classifications shown in Figure 1. As depicted in Figure 1, we analysed 464 of the most popular films between 2004-2009 and found that PG13 films (similar to M classification in Australia) have an estimated 61 alcohol depictions per film, 2.3 times more than PG films.^{6 7 8}

These appearances are predominantly positive and likely include alcohol-related product placement. Therefore, there is concern that the proposed changes will drastically increase both 1) the exposure to alcohol content generally and 2) exposure to product placement.

Figure 1. A boxplot of the amount of times alcohol is shown for different film classifications. The red dot is the mean and we have printed the mean value above each rating.



2. We also strongly advise that steps should be taken to reduce alcohol advertising. We also recommend the loopholes around sporting events that allow the promotion of alcohol advertising and sponsorship be closed – not expanded. These restrictions are supported by the Australian public.

In our recent commentary,¹⁵ we called for better regulation of alcohol marketing to protect viewers, and especially minors. One inspirational model is the Commonwealth Government's *Public Health (Tobacco and Other Products) Act 2023*.¹⁶ Currently, the updated legislation prohibits tobacco advertisements and sponsorship,⁷ and a similar approach can protect all Australians, and especially children, from the pervasive alcohol marketing currently shown in films and broadcast today. Restricting or banning alcohol advertising is classified as best-practice policies from the Lancet Commission¹⁷ and World Health Organisation.¹⁸ Both have repeatedly called for policy to regulate and reduce the content and volume of alcohol advertisements, especially exposed to children.^{11 12}

Research we have conducted with the Australian community confirms that they are supportive of more restrictive policies that reduce the amount of alcohol exposure. A sample of over 250 Australian adults¹⁹ were supportive of policies that reduced the glorification of alcohol in films and believed no alcohol portrayal should be shown in films aimed at children under the age of 15. Our recent qualitative interviews²⁰ with 25 Australian parents, grandparents, teachers, community members, uncles and aunts all highlighted their support for increased legislation of alcohol advertising and alcohol exposure, especially targeted towards children.

In summation, given the evidence presented, we believe that policies should focus on reducing alcohol advertising and exposure in television. There is also support from the public to retain or implement more restrictive policies.

Yours sincerely,

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Professor Emmanuel Kuntsche, Centre for Alcohol Policy Research

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