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Free TV Australia
Suite 1, Level 2
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codereview@freetv.com.au
8th November 2024

Re: Submission to the Commercial Television Industry Code of Practice Proposed amendments

Dear Free TV Australia,

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

The Dalgarno Institute is a long-standing, community-based not for profit health education charity that has been working for over 150 years in minimising harms by maximising prevention. As an organisation deeply committed to protecting young people from alcohol-related harms, we have significant concerns about the proposed changes to the Code and their potential impact on children and adolescents' exposure to alcohol advertising. Our interest in this consultation stems from our extensive research and evidence-based advocacy work documenting the impact of alcohol marketing on youth. Our gathered research has demonstrated that alcohol advertising significantly influences young people's drinking behaviours and attitudes, with particularly concerning effects during sports broadcasts and at times when children are likely to be watching television.

Australians should have the opportunity to be healthy, safe and free from the many ways that alcohol causes harm to people, families and communities. Yet tragically, Australia is currently experiencing the highest rates of alcohol-induced deaths in over 20 years.ⁱ Alcohol marketing, including broadcast advertising, influences people's preferences, attitudes, social norms and use of alcohol products, which subsequently impacts on community health, safety and wellbeing.

Health impacts of alcohol include hospitalisation and deaths from injury and other acute and chronic diseases, like cancer and mental ill-health. Alcohol is a carcinogen, causing at least seven types of cancer, including mouth, throat, oesophagus, liver, breast and bowel cancer.ⁱⁱ Alcohol has also been causally linked to alcohol-related brain injury and Fetal Alcohol Spectrum Disorder (FASD).

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Alcohol is also a significant factor in familial, intimate partner and other domestic violence.ⁱⁱⁱ There are several studies that show that violence involving alcohol increases at the time of major sporting events not least football grand finals and the State of Origin.^{iv,v} The link is so strong that the Rapid Review of Prevention Approaches for family and domestic violence recommended that *“alcohol advertising be restricted during sporting events”*.^{vi} They based this recommendation on *“the statistical increase in DFSV incidents during football grand finals, as well as the high number of children who watch sport on television and mobile apps”*.

Considering this recommendation, and the evidence showing that when children are exposed to alcohol advertising, they are more likely to start drinking early and to drink at higher risk levels,^{vii,viii} broadcast alcohol advertising should be reduced, not increased. Further research has found that children are extensively exposed to alcohol advertising through multiple channels. Studies show that:

Over 94% of Australian students aged 12 to 17 have seen alcohol advertising on television

- Young people who have greater exposure to alcohol marketing are more likely to initiate alcohol use early and engage in high-risk drinking
- In a single year, Australia's children and adolescents experience more than 50 million exposures to alcohol advertising through telecasts of just three major national sporting codes (AFL, NRL, cricket)
- During daytime hours, 87% of alcohol advertising appears during sports TV programming
- Global spending on alcohol advertising by just six of the largest alcohol producers totalled more than US\$2 billion

Children are frequently exposed to harmful alcohol advertising.^{ix,x,xi} Yet the draft Code proposes extending the hours that alcohol advertising can be shown to children by over 800 hours per year. Even more concerning is the proposal that these ads be shown during the daytime on school holidays, weekends and public holidays, when children are more likely to be watching alcohol advertising. Weekends and public holidays are also times when alcohol harms are more likely to occur.^{xii}

Research into young people's exposure to alcohol marketing has revealed concerning patterns:

Marketing companies have been found to use 15 and 16-year-olds to guide campaign development

- Internal documents show companies explicitly target university students as a "great place to create excitement and drive recruitment"

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- Studies show that alcohol advertisements frequently use themes of humour, friendship/mateship and value for money, which particularly appeal to young viewers
- Young people who own alcohol-branded merchandise are 1.5 times more likely to try drinking alcohol

Recommendation 1. Ensure that any changes to the *Commercial Television Industry Code of Practice* (including to the 'M' classification zone in Section 2.2.2), do not extend the hours when alcohol advertising is permitted to be broadcast.

This is in addition to the existing loophole where restrictions on alcohol advertising do not apply during the broadcast of sports programs on public holidays and weekends. This loophole increases alcohol advertising at higher risk times – during sporting events which are associated with increases in family and domestic violence.^{xiii,xiv} Companies tie these events into their branding during these events to maximise sales and profits during times that are most harmful. They even boast about the increase in sales during these times.^{xv}

The impact of alcohol marketing during sports broadcasts is particularly concerning: Again, studies have found that the top 10 alcohol companies placed 10,660 alcohol ads during Australian sports broadcasts over a 12-month period

- This amounts to an average of 75 minutes of alcohol advertising each week
- Almost half (45%) of these ads aired during children's viewing times
- Research shows that exposure to alcohol advertisements during national sports broadcasts significantly increases cravings in people with high-risk alcohol use
- Statistics indicate a 30-40% increase in domestic violence during major sporting events like AFL and NRL grand finals

Recommendation 2. Remove the exemption in Section 6.2 that allows alcohol advertising during sports broadcasts.

Recommendation 3. Remove the exemption in Section 8 of '*program sponsorship*' from alcohol advertising, that allows the promotion of alcohol companies during program broadcasts.

We strongly oppose the proposed changes to the M Classification zone in Code. We believe that these changes and the existing sports broadcast loopholes, breach the requirements in the Broadcasting Services Act 1992. These state that "*broadcasting services place a high priority on the protection of children from exposure to program material which may be harmful to them*" (s3), and that industry codes "*provide appropriate community safeguards*" (s123, 125, 130).^{xvi}

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The proposed changes to the Code would have significant impacts on our community and stakeholders by:

Increasing youth exposure to alcohol advertising by over 800 hours per year

- Undermining prevention efforts aimed at delaying alcohol initiation among young people
- Contributing to the normalisation of alcohol consumption during sporting events and adding to entrenched unhealthy links between celebration and alcohol consumption.
- Potentially increasing alcohol-related family violence during high-risk periods
- Contradicting public health evidence about the need to reduce, not increase, children's exposure to alcohol marketing
- Failing to protect vulnerable populations, particularly children and adolescents, from harmful advertising content
- Ignoring community sentiment, given that 77% of Australians support restricting alcohol advertising during times when children are likely to be watching television

Alcohol advertising should be shown less, not more and the sports loophole should be closed – not expanded.

The implementation of appropriate community safeguards in the Code would make a profound difference to our community and stakeholders in several critical ways. Studies have shown that youth exposure to alcohol advertising significantly affects drinking behaviours, with adolescents undergoing crucial neural development being particularly vulnerable to both short-term and long-term negative effects of alcohol.

By protecting children from exposure to alcohol advertising, we could prevent early initiation of drinking and reduce high-risk drinking patterns that often develop in youth. This is particularly crucial given that current research demonstrates that alcohol increases the risk of developing alcohol-use disorders, and Australia is experiencing the highest rates of alcohol-induced deaths in over 20 years.

Strong safeguards would also help reduce the normalised connection between alcohol and sport, which currently contributes to increased family violence during major sporting events. Moreover, proper restrictions would strengthen the ability of parents and community leaders to safeguard young people from alcohol harms. Currently, the pervasive nature of alcohol advertising undermines parental guidance by consistently portraying alcohol consumption as an essential component of social success, friendship, and enjoyment.

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The research shows that these marketing messages are particularly effective at creating positive associations with alcohol among young people, who are repeatedly exposed to themes of mateship, celebration, and social belonging through alcohol advertisements. This makes it exceptionally challenging for parents and community organisations to counter these powerful commercial messages with health-focused education and guidance about the real risks of alcohol consumption. With 77% of Australians supporting restrictions on alcohol advertising during times when children are likely to be watching television,¹⁷ implementing these safeguards would align with community values and help create healthier, safer environments for our young people to grow and develop.

Yours sincerely,
Shane Varcoe
Executive Director
Dalgarno Institute



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- ⁱ AIHW (2024) *Alcohol, tobacco & other drugs in Australia* <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/impacts/health-impacts>
- ⁱⁱ Cancer Council Victoria (2024) *Ways alcohol causes cancer - Alcohol causes at least 7 types of cancer* <https://www.cancervic.org.au/cancer-information/preventing-cancer/limit-alcohol/how-alcohol-causes-cancer>
- ⁱⁱⁱ ANROWS (2017) *Links between alcohol consumption and domestic and sexual violence against women: Key findings and future directions* https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2019/02/19024408/Alcohol_Consumption_Report_Compass-FINAL.pdf
- ^{iv} Livingston M (2018) *The association between State of Origin and assaults in two Australian states*. Centre for Alcohol Policy Research. <https://fare.org.au/wp-content/uploads/The-association-between-State-of-Origin-and-assaults-in-two-Australian-states-noEM.pdf>
- ^v Gallant D & Humphreys C (2018) *Football finals and domestic violence*. Pursuit, University of Melbourne. <https://pursuit.unimelb.edu.au/articles/football-finals-and-domestic-violence>
- ^{vi} Rapid Review (2024) *Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence*. p. 105 <https://www.pmc.gov.au/sites/default/files/resource/download/unlocking-the-prevention-potential-4.pdf>
- ^{vii} Jernigan D, Noel J, Landon J, et al (2017) *Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008* <https://onlinelibrary.wiley.com/doi/10.1111/add.13591>
- ^{viii} Martino F, Ananthapavan J, Moodie M, et al (2022) *Potential financial impact on television networks of a ban on alcohol advertising during sports broadcasts in Australia*, <https://www.sciencedirect.com/science/article/pii/S1326020023002893>
- ^{ix} ADF (2023) *Alcohol ads on social media target teens and young people* <https://adf.org.au/insights/alcohol-social-media-youth/>
- ^x Middleton K (2024) *Beer advertisements shown to kids during streamed TV programs like Lego Masters*. The Guardian. <https://www.theguardian.com/australia-news/article/2024/jun/30/beer-advertisements-shown-to-kids-during-streamed-tv-programs-like-lego-masters>
- ^{xi} Jones SC, Magee CA (2011) *Exposure to Alcohol Advertising and Alcohol Consumption among Australian Adolescents*. <https://pubmed.ncbi.nlm.nih.gov/21733835/>
- ^{xii} Lloyd B (2012) *Drinking cultures and social occasions – public holidays Research summary*. Turning Point. https://www.vichealth.vic.gov.au/sites/default/files/Drinking-cultures-social-occasions-Factsheet_public-holiday.pdf
- ^{xiii} Brimicombe A & Cafe R (2012) *Beware, win or lose: Domestic violence and the World Cup* <https://rss.onlinelibrary.wiley.com/doi/full/10.1111/j.1740-9713.2012.00606.x>
- ^{xiv} Forsdike K, O'Sullivan G, Hooker L (2022) *Major sports events and domestic violence: A systematic review*. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10087409/>
- ^{xv} Food & Beverage (2024) *Most popular State of Origin drinks revealed* <https://www.foodmag.com.au/most-popular-state-of-origin-drinks-revealed/>
- ^{xvi} Commonwealth of Australia (2024) *Broadcasting Services Act 1992* https://www8.austlii.edu.au/cgi-bin/viewdb/au/legis/cth/consol_act/bsa1992214/
- ¹⁷ Alcohol Change Australia (2023) *Public opinion on alcohol in Australia* https://alcoholchangeaus.org.au/wp-content/uploads/2023/11/AlcoholChangeAustralia_Report_FINAL.pdf



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