

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).

My name is Kym Valentine. I am a well-known television actor with over 40 years of experience in the television industry, but today I write to you as a victim survivor of family violence.

I am a former member and chairperson of the Victorian Victim Survivors' Advisory Council (VSAC), a current Facilitator/Advisor, Survivor Advocate, Lived Experience Well-Being Coordinator and Lived Experience Research Officer at Safe and Equal and a Lived Experience Advisor at the Foundation for Alcohol Research and Education (FARE).

I represent the voice of lived experience and highlight the ways alcohol intensifies family violence. I amplify the voice and perspective of children and young people who don't have a voice and don't have a choice when it comes to alcohol harm in their home.

Research shows one in six children have experienced harm from the alcohol use of adults around them<sup>1</sup>, with two-thirds of harm being attributed to an adult in their home.

Children should be safe in their own homes, and often it's the experiences of children that are missing in conversations about the way that alcohol impacts on families and communities.

Australia is currently experiencing the highest rates of alcohol-induced deaths in over 20 years.<sup>2</sup> 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.

As a Survivor Advocate, I have heard so many stories of harm. While everyone's story is unique, there are commonalities, and there are immediate levers to address each of these – including alcohol.

The link between alcohol and violence has always been categorically undeniable. For victim survivors it is unequivocal. Our real-life experiences cannot be ignored, suppressed or denied.

The kids who have hidden in closets and bathrooms – know that when drinking is involved, it's like pouring petrol on a bonfire. Children living in fear in their own homes deserve a sense of urgency to help keep them safe.

There are several studies that show that violence involving alcohol increases at the time of football grand finals and the State of Origin.<sup>3,4</sup> 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*".<sup>5</sup> 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,<sup>6,7</sup> broadcast alcohol advertising should be reduced, not increased.

Children are frequently exposed to harmful alcohol advertising.<sup>8,9,10</sup> 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.<sup>11</sup>

**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.<sup>12,13</sup> 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.<sup>14</sup>

**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.

I strongly oppose the proposed changes to the M Classification zone in Code. I 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).<sup>15</sup>

The availability, accessibility and now advertising of alcohol in the home has skyrocketed. It is undeniable that when alcohol increases so does the risk of harm. That's why alcohol advertising should be shown less, not more and the sports loophole should be closed – not expanded.

It is also vital that the voices of people with lived experience of violence exacerbated by alcohol are part of this process. I urge you to listen to the voices of people who are most affected when making these life changing decisions.

I implore you to put people before profit and communities before companies.

Yours sincerely,

Kym Valentine

*VSAC member 2020-2023*

*VSAC Chair 2022-2023*

*Foundation for Alcohol Research and Education (FARE) Lived Experience Advisor 2021-Present*

*Safe and Equal Facilitator/Advisor, Survivor Advocate, Lived Experience Well-Being Coordinator and Lived Experience Research Officer 2023-Present*

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- <sup>2</sup> AIHW (2024) *Alcohol, tobacco & other drugs in Australia* <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/impacts/health-impacts>
- <sup>3</sup> 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>
- <sup>4</sup> 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>
- <sup>5</sup> 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>
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- <sup>7</sup> 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>
- <sup>8</sup> ADF (2023) *Alcohol ads on social media target teens and young people* <https://adf.org.au/insights/alcohol-social-media-youth/>
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- <sup>11</sup> 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](https://www.vichealth.vic.gov.au/sites/default/files/Drinking-cultures-social-occasions-Factsheet_public-holiday.pdf)
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- <sup>14</sup> Food & Beverage (2024) *Most popular State of Origin drinks revealed* <https://www.foodmag.com.au/most-popular-state-of-origin-drinks-revealed/>
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