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Submission from the Synod of Victoria and Tasmania, Uniting Church in Australia on changes to the Commercial Television Industry Code of Practice

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The Synod of Victoria and Tasmania, Uniting Church in Australia welcomes the opportunity to provide feedback on the amendments to the Commercial Television Industry Code of Practice.

Our faith leads us to believe all people should be able to enjoy safe and healthy environments that support our well-being.

Theologian Kathryn Tanner, in her book *'The Politics of God'* (1992), pointed out that all people are valuable to God. As a result of being valuable to God, all people should have a right to minimum well-being standards. In his work *'A Public Faith. How Followers of Christ Should Serve the Common Good'* (2011), theologian Miroslav Wolf made the case that if we believe God is love and we are created for love, we will care for our neighbours' well-being for their own sake. He stated (p.71):

Our concern will then be not just to lead life well ourselves. Instead, we will strive for life to go well for our neighbours and for them to lead their lives well, and we will acknowledge that their flourishing is tied deeply to our flourishing.

Each year, alcohol products cause nearly 6,000 Australians to die from alcohol-related diseases.¹

Alcohol use is known to cause at least seven types of cancer: breast, bowel, mouth, pharynx, larynx, oesophagus, and liver cancer.² Alcohol causes more than 3,200 new cancer cases,³ and more than 2,000 cancer deaths,⁴ in Australia each year.

¹ National Drug Research Institute, *National alcohol indicators: Estimated alcohol-attributable deaths and hospitalisations in Australia, 2014 to 2015*. National Drug Research Institute Bulletin 16.

² International Agency for Research on Cancer. IARC monographs on the evaluation of carcinogenic risks to humans: Volume 100E, Personal habits and indoor combustions. In: Lyon, France: International Agency for Research on Cancer; 2012; World Cancer Research Fund. Summary of global evidence on cancer prevention. In: London, UK: World Cancer Research Fund; 2017.

³ Pandeya, N, Wilson, LF, Webb, PM, Neale, RE, Bain, CJ & Whiteman, DC 2015, 'Cancers in Australia in 2010 attributable to the consumption of alcohol', *Australian and New Zealand Journal of Public Health*, vol. 39, no. 5, 408-413.

⁴ National Drug Research Institute, *National alcohol indicators: Estimated alcohol-attributable deaths and hospitalisations in Australia, 2014 to 2015*. National Drug Research Institute Bulletin 16.

Uniting Church members have been concerned about the harm that alcohol corporations do. In 2010, in response to the fact that children and young people are exposed to huge volumes of alcohol advertising⁵, the governing body of hundreds of delegates of Uniting Church members across Victoria and Tasmania passed a resolution calling for a “ban alcohol advertisements from being shown on television before 9.30 pm.”

In our view, decisions about if and when alcohol ads can be broadcast should be based on evidence about the impact of alcohol ads on young people and independent analysis of data on young people’s TV viewing patterns. Comprehensive regulation of alcohol marketing across all platforms is required to reduce children and young people’s exposure.

We urge Free TV Australia to use this review to support action in reducing young people’s exposure to alcohol advertising on commercial television.

Expert reports from the World Health Organization, the Australian Medical Association, the National Preventative Health Taskforce, and other groups recommend restricting alcohol advertising during times and in places that have high exposure to children and young people.⁶

Alcohol causes health risks that accumulate over a lifetime. The younger a person starts drinking, the longer they will be exposed to these risks. People who begin drinking alcohol at an early age, even in small amounts, are more likely to develop alcohol and substance abuse problems later in life than those who delay drinking.⁷

Alcohol reduces internal brakes on behaviour, which means that young people who drink may take part in behaviour they would not usually take part in, such as risky sexual activity. Lower awareness of risk may also lead them to expose themselves to pregnancy or sexually transmitted diseases. Research indicates that young people, especially girls, are more vulnerable to sexual assault if they have been drinking.⁸

Young people who drink heavily are also more likely than their peers to get involved in antisocial or offensive behaviour, which can lead to problems with their friends and peers or contact with the police.⁹

Research indicates that even low levels of regular alcohol consumption are associated with developmental delays in young people. These may include memory loss, cognitive impairment and learning difficulties and damage to parts of the brain that relate to motivation, impulse control and addiction. This is because young people’s brains are not fully developed until their early twenties and sometimes later. Early alcohol consumption can alter the development of pathways within the brain.¹⁰

Children and young people are highly vulnerable to alcohol advertising. The more alcohol

⁵ Faulkner A, Azar D & White V 2017 ‘Unintended’ audiences of alcohol advertising: exposure and drinking behaviors among Australian adolescents’ *Journal of Substance Use*, vol 22, no 1, 108-112; and Jones, SC & Magee CA 2011, ‘Exposure to alcohol advertising and alcohol consumption among Australian adolescents’ *Alcohol and Alcoholism*, vol 46, no. 5, 630-637.

⁶ World Health Organization, ‘Global strategy to reduce the harmful use of alcohol’, Geneva, 2010; Australian Medical Association, ‘Alcohol Marketing and Young People: Time for a new policy agenda’, Canberra, 2012; and National Preventative Health Taskforce, ‘Australia: The Healthiest Country by 2020 – National Preventative Health Strategy – the roadmap for action’, Commonwealth of Australia, Canberra, 2009.

⁷ VicHealth and Australian Drug Foundation, ‘Alcohol and young people – the harm’.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

advertising children are exposed to, the younger the age they start using alcohol, and the more often and more heavily they drink once they start.¹¹ Alcohol advertising can cause them to establish high-risk drinking habits that lead to both short-term harm and health problems later in life. A Cancer Council Victoria study of alcohol advertising on billboards and print media found that the more children aged 12-17 years saw alcohol advertising on billboards or in newspapers or magazines, the more likely they were to use alcohol regularly and at high-risk levels.¹²

Children are frequently exposed to harmful alcohol advertising.¹³ 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 advertisements be shown during the daytime on school holidays, weekends and public holidays when children are more likely to watch television. Weekends and public holidays are also times when alcohol harm is more likely to occur.¹⁴

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

Alcohol is also a significant factor in family and domestic violence.¹⁵ Several studies show that violence involving alcohol increases at the time of football grand finals and the State of Origin.¹⁶ 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*".¹⁷ 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 sports on television and mobile apps*".

We are opposed to the existing loophole where restrictions on alcohol advertising do not apply during the broadcast of sports programs on public holidays and weekends. The loophole increases alcohol advertising at higher risk times – during sporting events, which are associated with increases in family and domestic violence.¹⁸ Corporations tie these events into their branding

¹¹ Jernigan D, Noel J, Landon J, Thornton N & Lobstein T 2016, 'Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008', *Addiction*, vol 112 (Suppl 1), 7-20; Anderson, P, de Bruijn, A, Angus, K, Gordon, R & Hastings, G 2009, 'Impact of alcohol advertising and media exposure on adolescent alcohol use: A systematic review of longitudinal studies', *Alcohol and Alcoholism*, vol. 44, no. 3, 229-43; and Smith, LA & Foxcroft, DR 2009, 'The effect of alcohol advertising and marketing on drinking behaviour in young people: Systematic review of prospective cohort studies', *BMC Public Health* (online), vol. 9, no. 51.

¹² Faulkner A, Azar D & White V 2017 'Unintended audiences of alcohol advertising: exposure and drinking behaviors among Australian adolescents' *Journal of Substance Use*, vol 22, no 1, 108-112

¹³ ADF (2023) *Alcohol ads on social media target teens and young people* <https://adf.org.au/insights/alcohol-social-media-youth/>; 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>; and Jones SC, Magee CA (2011) *Exposure to Alcohol Advertising and Alcohol Consumption among Australian Adolescents*. <https://pubmed.ncbi.nlm.nih.gov/21733835/>

¹⁴ 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

¹⁵ 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

¹⁶ 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>; and 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>

¹⁷ 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>

¹⁸ 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>; and Forsdike K, O'Sullivan G, Hooker L

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.¹⁹

The exemption in the TV Code of Practice, which allows alcohol advertising during live sports broadcasts, is illogical as it undermines the code's condition that alcohol advertisements cannot be screened during children's viewing times. Alcohol advertisements should not be broadcast during any sporting event. There are well-publicised concerns about linking alcohol and sport in the minds of children.

We ask for the removal of the exemption in Section 6.2 that allows alcohol advertising during sports broadcasts.

We also ask for the removal of the exemption in Section 8 of 'program sponsorship' from alcohol advertising, which allows the promotion of alcohol corporations and their branding during program broadcasts.

We strongly oppose the proposed changes to the M Classification zone in the Code. We believe these changes and the existing sports broadcast loopholes breach the *Broadcasting Services Act 1992* requirements. 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).²⁰

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(2022) *Major sports events and domestic violence: A systematic review.*
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10087409/>

¹⁹ Food & Beverage (2024) *Most popular State of Origin drinks revealed* <https://www.foodmag.com.au/most-popular-state-of-origin-drinks-revealed/>

²⁰ Commonwealth of Australia (2024) *Broadcasting Services Act 1992* https://www8.austlii.edu.au/cgi-bin/viewdb/au/legis/cth/consol_act/bsa1992214/