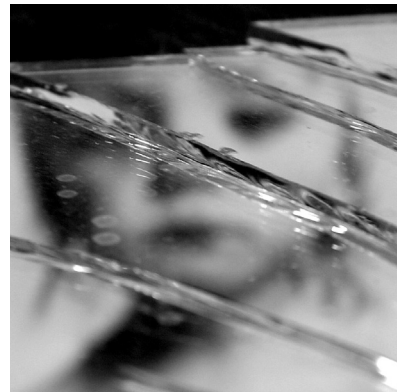


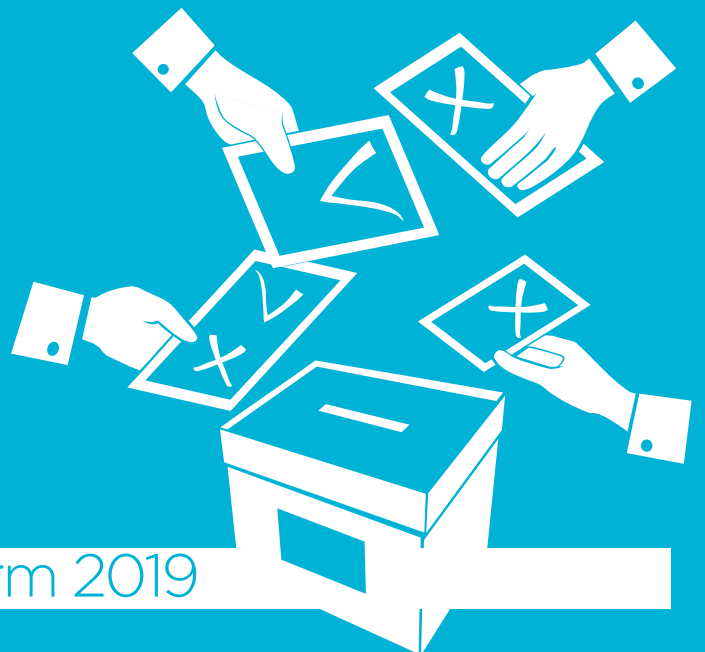


Foundation for Alcohol Research & Education



# PROTECT FAMILIES FROM ALCOHOL HARM

FARE's Election Platform 2019



# About FARE

The Foundation for Alcohol Research and Education (FARE) is an independent, not-for-profit organisation working to stop the harm caused by alcohol.

Alcohol harm in Australia is significant. Nearly 6,000 lives are lost every year and more than 144,000 people are hospitalised making alcohol one of our nation's greatest preventive health challenges.

For more than a decade, FARE has been working with communities, governments, health professionals, law enforcement and emergency services across the country to stop alcohol harm by supporting world-leading research, raising public awareness and advocating for changes to alcohol policy.

FARE is guided by the World Health Organization's (2010) Global strategy to reduce the harmful use of alcohol for stopping alcohol harm through population-based strategies, problem directed policies, and direct interventions.

If you would like to contribute to FARE's important work, call us on (02) 6122 8600 or email [info@fare.org.au](mailto:info@fare.org.au).



**STOPPING  
HARM  
CAUSED BY  
ALCOHOL**

**fare**  
Foundation for Alcohol  
Research & Education

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# Introduction

Australia has now entered its eighth year without a National Alcohol Strategy, just as figures show the number of alcohol-related deaths a year is approaching 6,000.<sup>1</sup> However, the toll of alcohol on Australian families extends well beyond deaths – to street violence in popular night spots, injury from falls and road crashes, the drag on Australia’s economy through time lost and ill-health, and the enormous impact on families through domestic violence, child neglect and dysfunction, particularly in First Nations communities.



This should be a wake-up call to Australia’s political leaders, and a wake-up call to consumers too.

The consumption of alcohol makes a significant contribution to the burden of chronic disease in Australia, with the total cost now exceeding \$27 billion annually.<sup>2</sup> This reflects the broader failure of Australian governments to adopt strong preventive health policies to arrest this growing burden.

***Disturbing new research evidence has emerged from around the world of the contribution of alcohol to more than 200 injury and health conditions.***

International cancer authorities have revealed that risk of breast, mouth, throat and oesophagus cancer is increased with any regular amount of alcohol consumption and continues to increase with every drink.<sup>3</sup> Major studies in 2018 revealed the increased risk of dementia from drinking alcohol. Fifty-seven per cent of early-onset dementia cases in France were found to be alcohol-related,<sup>4</sup> and a Swedish study found a dose-response relationship between alcohol intake and lower cognitive function, even among light consumers.<sup>5</sup>

***Overwhelmingly, Australians (84 per cent) believe they have a right to know about long-term harm associated with regular alcohol use.***

And yet, only a small minority (16 per cent) are aware of the link between alcohol and breast cancer, and only 26 per cent are aware of the link with mouth and throat cancer.<sup>6</sup> This deficit needs to be addressed with a properly-resourced national public awareness campaign.

The consumption of alcohol is heavily normalised, and is constantly reinforced by the prolific marketing and promotion of alcohol brands. Yet Australian governments have been slow to act on the abundance of evidence showing the risks alcohol advertising pose for children and young people. It is imperative that the incoming government stops alcohol advertising during children’s TV viewing hours and stems the unregulated tide of online alcohol advertising.

***The danger of alcohol harm to children begins before birth, as alcohol is the leading cause of preventable, non-genetic, developmental disability in Australia.***<sup>7</sup>

Thousands of children each year are born with Fetal Alcohol Spectrum Disorder (FASD). Although some important steps have been taken to respond to the harm caused to the unborn child by drinking during pregnancy, there has been a severe disregard by Australian governments for preventing FASD. This must be addressed through investment in a strong consumer-focused public awareness campaign.

Family and domestic violence is a continuing blight on Australian society and government efforts to prevent this violence remain inadequate. Governments have neglected to act on the clear lessons from First Nations communities where action to restrict alcohol’s availability has repeatedly shown dramatic reductions in violence, child neglect and community dysfunction. There must be more focus on addressing alcohol as a risk factor in family violence.

The sum of this is that families are being exposed to too much alcohol, putting them at risk of harm in both the short and long term.

**“A government that does not take action to stop harm from alcohol is one that is beholden to big business and is captive to the alcohol industry.”**

**What Australia needs is a plan to tackle alcohol harm; a plan that is actionable, affordable and achievable.**

This plan raises awareness about the real risks to families, and provides a future free from alcohol harm for all Australians.

**Strong public awareness campaigns can be funded with a modest and affordable health levy on alcohol.**

The alcohol industry profits from the sale of a drug that causes substantial harm and incurs substantial cost to society. It is appropriate that this business should be taxed and the revenue used to offset some of the societal cost and reduce the harm caused by alcoholic products.

The proposed investment in public awareness campaigns of \$110 million (over four years) could be funded with a health levy on all alcohol sales for less than one-fifth of a cent (0.18 cents) per standard drink or 14 cents per litre of pure alcohol sold.

Financially, this is a modest investment to offset the more than \$10 billion a year direct cost of alcohol to Australia, and governments in particular, arising from the consumption of alcohol.<sup>8</sup>

The incoming government must take a preventive approach to health.

Australia has been a world leader in preventive health, successfully reducing smoking rates and HIV infections, achieving drastic improvements in road safety and currently on track to eliminate cervical cancer by 2035.

Worryingly, investment in preventive health from the Australian Government has declined and we have now fallen behind the United Kingdom, New Zealand and Canada on per capita expenditure for preventive health (less than two per cent).<sup>9</sup>

**Now is the time for action and investment, as one in two Australians are currently living with at least one life-long debilitating chronic condition, including alcohol-related cancer, heart disease and dementia.**

We know what needs to be done to reduce preventable disease and suffering in Australia. International strategies, research articles and reports give clear guidance, including the World Health Organization's (WHO) 'Best Buys' for the prevention and control of non-communicable diseases.<sup>10</sup>

And doing so will result in a healthier, safer and happier environment for Australian families. While the actions will require buy-in and cooperation across portfolios and levels of government, all the actions are easily achievable, with strong leadership, in the next term.

Almost three quarters (73 per cent) of Australians believe that Australia has a problem with alcohol, and the majority (76 per cent) of Australians believe that more needs to be done to reduce alcohol harm.<sup>11</sup>

Alcohol is a product sold for commercial gain by alcohol companies. It is a harmful commodity that confers no health benefit. A government that does not take action to stop harm from alcohol is one that is beholden to big business and captive to the alcohol industry. FARE's 2019 Election Platform provides a simple pathway to take action now to prioritise the health and wellbeing of Australians.

The Foundation for Alcohol Research and Education's (FARE) Election Platform outlines four actions to prioritise in the next term of government. These actions are focused on enabling consumer choice and protecting children's safety and health.

# Policy snapshot

FARE's Election Platform calls for action in four areas:



1

## INFORM CONSUMERS ABOUT THE LONG-TERM HEALTH EFFECTS OF DRINKING ALCOHOL

Provide \$100m over four years for a strong and consistent public awareness campaign to communicate the risks of long-term health effects of alcohol.

Mandate the use of health advisory information on all forms of alcohol advertising, occupying a minimum of 20 per cent of the advertising broadcast time or physical space.



2

## PREVENT LIFELONG DISABILITY BY STOPPING ALCOHOL USE DURING PREGNANCY

Provide \$10m over four years for a national campaign to raise awareness of the need to abstain from alcohol use during pregnancy.

Invest in the National Disability Insurance Scheme to provide equitable access for people with FASD, their carers, and to prevent secondary disabilities and disadvantage.

## PROTECT FAMILIES FROM ALCOHOL HARM

FARE's Election Platform 2019



## AFFORDABLE

Small change can change lives.

Fully-funded campaigns for less than half a cent per standard drink.





3

**REDUCE ALCOHOL-FUELLED FAMILY VIOLENCE THROUGH ACTIONS THAT ADDRESS ALCOHOL AS A RISK FACTOR**

Include specific actions in the Fourth Action Plan on family violence in order to reduce the severity and frequency of alcohol's involvement in family violence incidents and ensure women and children's safety.



4

**PROTECT CHILDREN AND YOUNG PEOPLE FROM ALCOHOL ADVERTISING**

Lift the exemption to time-based restrictions of alcohol advertising on free-to-air television to prevent children being exposed.

Introduce effective regulation to ensure that children using online spaces are protected from exposure to alcohol advertising and marketing.

Establish an independent regulator of alcohol advertising free of industry involvement to regulate content and placement and carry out enforcement.

**ACHIEVABLE**

73 per cent believe that Australia has a problem with alcohol, and 76 per cent believe that more needs to be done to reduce alcohol harm.



**ACTIONABLE**

FARE's 2019 Election Platform draws on the WHO's 'best buys' and provides a clear roadmap for action to reduce preventable harm caused by alcoholic products.





# 1

## INFORM CONSUMERS ABOUT THE LONG-TERM HEALTH EFFECTS OF DRINKING ALCOHOL

Like tobacco, alcohol is a group 1 carcinogen. Risk of breast cancer, mouth cancer, throat cancer and oesophagus cancer is increased with any regular amount of alcohol and continues to increase with every drink.<sup>12</sup> This means that there is no risk-free limit for alcohol consumption.

Australians have a right to know about the long-term health risks of alcohol consumption so that they can make an informed consumer choice. Eighty-four per cent of Australians believe they have a right to know about long-term harm associated with regular alcohol use. Eighty per cent of Australians think governments have a responsibility to educate the public about long-term harm from alcohol.<sup>13</sup>

### Conduct a national public awareness campaign about the long-term health effects of alcohol

Too many Australians are unaware of the relationship between alcohol and a range of health problems. Only 16 per cent of Australians are aware of the link between alcohol and breast cancer and only 26 per cent are aware of the link with mouth and throat cancer.<sup>14</sup>

It is estimated that 3,208 cases of cancer (or 2.8 per cent of all cancers) are attributable to alcohol each year in Australia.<sup>15</sup>

Awareness of the National Health and Medical Research Council (NHMRC) alcohol guidelines remains low. Less than half (42 per cent) of Australians are able to correctly estimate the recommended number of standard drinks to minimise long-term risks from alcohol.<sup>16</sup>

Australians have a right, and a need, to know about the risks of alcohol consumption. In Australia and internationally, social marketing campaigns have been effectively used to raise awareness of public health issues such as the harm associated with tobacco use and risks associated with drink driving. However, there has been no national public awareness campaign targeted at reducing alcohol-related harm since Labor's 2008 *Don't turn a night out into a nightmare* campaign.

Instead, the only messages that Australians are currently receiving about alcohol are those promoted through prolific advertising by the alcohol industry. Spirits producer Diageo, whose brands include Johnnie Walker, Smirnoff

and Guinness, alone spends approximately \$20 million on marketing each year.<sup>17</sup>

Public education campaigns are effective in both raising awareness and changing behaviour if sustained, well-resourced and introduced as part of a comprehensive policy framework. A review of eight studies evaluating drink driving mass media campaigns found that campaigns both raised awareness and changed behaviours when they were planned, well executed, had good audience exposure and were implemented in conjunction with other prevention activities, such as high visibility policing for drink driving prevention.<sup>18</sup> These campaigns were found to reduce alcohol-impaired driving and alcohol-related crashes. Similarly, a review of 26 studies of tobacco mass media campaigns found that campaigns with sufficient population exposure both promoted quitting and reduced adult smoking prevalence.<sup>19</sup>

Internationally, other countries have been more active in educating their populations about alcohol harm through social marketing campaigns. This includes England, which invested in two national campaigns in



2008-09 and 2010. The first campaign, *Know your limits*, informed consumers about the number of standard drinks in a variety of alcohol products. It consisted of television and radio advertisements, as well as resources for consumers and health professionals such as online unit calculators and a dedicated website. This was a precursor to *Alcohol Effects*, the follow-up campaign which demonstrated how alcohol affects the organs in the body. This was again supported through television and radio advertisements, as well as a toolkit for health professionals and consumer resources.<sup>20</sup> Awareness of the links between alcohol and mouth cancer by the general population increased from five per cent to 24 per cent after the *Alcohol Effects* campaign.<sup>21</sup>

An investment of \$100m over four years would provide sufficient resources for a comparable and effective national awareness campaign. This funding could be raised with a health levy on all alcohol sales for less than one-fifth of a cent (0.18 cents) per standard drink or 14 cents per litre of pure alcohol sold.

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### **POLICY ASK**

Provide \$100m over four years for a strong and consistent public awareness campaign to communicate the risks of long-term health effects of alcohol.

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### **Introduce health warnings on all forms of alcohol advertising**

The Australian Government's *National Preventative Health Taskforce* report in 2010 recommended that all alcohol advertising have health advisory information or counter advertising of a minimum of 25 per cent of

the advertisement broadcast time or physical space.<sup>22</sup> This was to ensure that the community receives clear and consistent messaging about alcohol from an independent and credible source, rather than from the alcohol industry.

Several countries have adopted mandatory warning messages on alcohol advertising. Sweden requires alcohol advertisements in newspapers to include warning messages about the health consequences of alcohol consumption. They must occupy at least 20 per cent of the advertisement and appear in black text on a white background with a black frame to ensure prominence.<sup>23</sup> In France all alcohol advertisements must include the health warning "alcohol abuse is dangerous for health".<sup>24</sup> In 2018, Ireland introduced mandatory warnings to be displayed on all alcohol advertisements, in order to inform the public of the dangers of consuming alcohol during pregnancy, and the risk of developing cancer.<sup>25</sup>

Experience from tobacco labelling strongly suggests that explicit health warning labels, particularly pictorial labels, can be effective not only in raising awareness

but also in influencing behaviour change. At least a quarter of respondents in all four countries in the International Tobacco Control evaluation (the UK, USA, Canada and Australia) reported that these warnings had made them more likely to quit. Such warnings are also thought to have indirectly influenced behaviour change by stimulating peer pressure from non-smokers.<sup>26</sup>

Evidence shows that a similar effect could be achieved through alcohol warning labels. The Global Drug Survey (2018) found that 22.1 per cent of Australians *would* consider drinking less after learning about the risk of cancer from warning labels, and a further 22 per cent *might* consider drinking less.<sup>27</sup> This suggests that almost one in two drinkers may change their consumption behaviour after learning about long-term health harm from alcohol warning labels.

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### **POLICY ASK**

Mandate the use of health advisory information on all forms of alcohol advertising, occupying a minimum of 20 per cent of the advertising broadcast time or physical space.





# 2

## PREVENT LIFELONG DISABILITY BY STOPPING ALCOHOL USE DURING PREGNANCY

Alcohol consumption during pregnancy is associated with a range of adverse consequences including miscarriage, still birth, low birth weights and FASD.

FASD is the leading cause of preventable developmental disability in Australia. The majority of children and adults who have FASD live with significant cognitive, behavioural, health and learning difficulties, including problems with memory, attention, cause and effect reasoning, impulsivity, receptive language and adaptive functioning difficulties.<sup>28</sup> These disabilities are lifelong.

### Raise awareness about FASD

Significant numbers of women are still drinking alcohol during pregnancy. In 2016, one in four women (25 per cent) consumed alcohol after becoming aware of their pregnancy.<sup>29</sup>

FASD is preventable. Unfortunately many women remain unaware or under-informed of the risks, and are not supported to abstain from alcohol during pregnancy. If the prevention of FASD is to be taken seriously the government must implement a national campaign to raise awareness of the need to

abstain from alcohol use during pregnancy. An investment of \$10m over four years is needed for an effective national awareness campaign. \$10 million is the sum required to scale up FARE's successful Pregnant Pause and Women Want to Know initiatives to national campaigns and sustain them over four years. The twin Pregnant Pause and Women Want to Know campaigns have been effective methods for encouraging alcohol-free pregnancies since 2012 and 2014 respectively. As already outlined, this funding could be raised with a very small health levy on alcohol.

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#### POLICY ASK

Provide \$10m over four years for a national campaign to raise awareness of the need to abstain from alcohol use during pregnancy.

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The *National FASD Strategy 2018-2028* aims to provide a framework for governments, communities and service providers to reduce the incidence of FASD and its impact over the next ten years. The \$7.2m of additional funding provided over the next two years will aid the implementation of the Strategy, but much greater investment is required to truly

prevent and address FASD, as well as a commitment from the Australian Government to work with states and territories on implementation.

### Provide equitable access to the NDIS

A 2018 study indicates that the prevalence of FASD in youth detention in Western Australia is 36 per cent. The majority of these young people had not been diagnosed before the study took place.<sup>30</sup> Early intervention and support can prevent people with FASD experiencing increasing disability and disadvantage as they mature. However, people with FASD and their carers have difficulty accessing funding through the National Disability Insurance Scheme (NDIS) for disability support services due to not having an official diagnosis. To prevent secondary disabilities from FASD the government must provide better diagnostic and support services for parents and carers.

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#### POLICY ASK

Invest in the National Disability Insurance Scheme to provide equitable access for people with FASD, their carers, and to prevent secondary disabilities and disadvantage.

# 3

## REDUCE ALCOHOL-FUELLED FAMILY VIOLENCE THROUGH ACTIONS THAT ADDRESS ALCOHOL AS A RISK FACTOR



Alcohol is a significant contributor to family violence in Australia. In NSW, Victoria, WA and the NT alone, there were 29,684 incidents of alcohol-related family violence reported to police over one year in 2014. Alcohol was involved in 23<sup>31</sup>-65<sup>32</sup> per cent of family violence incidents reported to police in these jurisdictions.

Alcohol consumption also contributes to child abuse and neglect, including children being left unsupervised, left in an unsafe situation or being verbally or physically abused. An estimated 10,166 children are in the child protection system at least partly due to the drinking of a carer, and an additional 142,582 are substantially affected by someone's alcohol consumption.<sup>33</sup> In NSW, Victoria, WA and the NT, carer alcohol abuse is associated with between 15 and 47 per cent of substantiated child abuse cases.<sup>34</sup>

Despite the significant involvement of alcohol in family violence, government actions to prevent family violence rarely give serious consideration to alcohol use and its contribution. No plans, at any level, address the issue adequately. This is a significant failing of Australia's response to family violence to date.

Action is needed now to prevent alcohol-related family violence. This includes greater collaboration between the family violence and alcohol and other drugs (AOD) sectors.

AOD services also need funding for training and implementation of evidence-based guidelines on family-centred practice. Strategies are needed for working with clients experiencing family and domestic violence, including development of clearly defined referral processes if child abuse or neglect is identified or suspected.

All jurisdictions also need funding to develop and maintain integrated models of care for alcohol-related family violence.

At a population level, policies are desperately needed that reduce the availability and affordability of alcohol. Despite the evidence of the link between increased alcohol outlet density and increases in family violence, barriers are still placed in the way of community groups and councils attempting to halt the flow of alcohol through their communities. Reformation of alcohol taxation and increased restrictions on online sales are also needed to decrease the role alcohol in family violence.

To date, government plans have either not adequately acknowledged alcohol's involvement in family violence, or have failed to embrace strategies to address the issue. This failure is most aptly demonstrated in the *Third Action Plan 2016-2019*, where the only mention of alcohol is within the glossary. No other acknowledgement of alcohol's contribution or strategies to reduce harm is provided. The lack of actions and strategies limits the ability of both the AOD sector and the family violence sector to work together effectively and make significant differences to women and children's lives.

Alcohol should be properly considered in the implementation of the *Fourth Action Plan 2019-2022* of the *National Plan to Reduce Violence against Women and their Children 2010-2022*.

### POLICY ASK

Include specific actions in the *Fourth Action Plan* on family violence in order to reduce the severity and frequency of alcohol's involvement in family violence incidents and ensure women and children's safety.



# 4

## PROTECT CHILDREN AND YOUNG PEOPLE FROM ALCOHOL ADVERTISING

Evidence clearly shows that young people's exposure to alcohol marketing increases their alcohol consumption and increases their likelihood to start drinking earlier.<sup>35,36,37</sup>

A systematic analysis of longitudinal studies on the impact of alcohol advertising on adolescent alcohol use reviewed 13 longitudinal studies that followed up a total of more than 38,000 young people over periods ranging from eight to 96 months. The studies measured exposure to advertising and promotion in a variety of ways, including estimates of the volume of media and advertising exposure, ownership of branded merchandise, recall and receptivity.

The researchers concluded that alcohol advertising and promotion increases the likelihood that adolescents will start to use alcohol earlier, and drink more if they are already using alcohol.<sup>38</sup>

### End the exemption which allows alcohol advertising during children's TV viewing hours

An overwhelming majority of Australian parents and guardians

(89 per cent) agree that alcohol advertising should not be shown on television during children's viewing hours.<sup>39</sup>

Alcohol advertising on television, particularly free-to-air television, is overseen by the *Commercial Television Industry Code of Practice* (the Code). This Code regulates the placement and volume of alcohol adverts and is administered by Free TV Australia. The Code allows for alcohol adverts to be shown on television during children's viewing hours if it accompanies a sports program or a live sporting event.<sup>40</sup>

This exemption is heavily exploited by the alcohol industry, with 49.5 per cent of all alcohol advertising shown during the broadcast of live sporting events.<sup>41</sup>

There is evidence that the exemption is causing harm; alcohol sponsorship of sporting events is resulting in children and young people associating alcohol with sport.<sup>42,43</sup> This is not surprising given an estimated cumulative audience of 26.9 million Australian children and adolescents across Australia's three major televised sporting codes, AFL, cricket and NRL, are exposed to 51 million instances of alcohol advertising

each year, with nearly half (47 per cent) of these broadcast during daytime programming between 6am and 8.30pm.<sup>44</sup>

The alcohol industry advertises to children because it knows that it works. It uses and abuses sport to cultivate its consumers of the future and normalise harmful behaviours. The harm to physical and mental health resulting from this advertising cancels out any benefits that accrue from children being inspired to undertake physical activity when they watch live sport.

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### POLICY ASK

Lift the exemption to time-based restrictions of alcohol advertising on free-to-air television to prevent children being exposed.

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### Protect children from online alcohol advertising

The current extent of online alcohol advertising in Australia is unknown. What is known is that the alcohol industry spends a significant amount on advertising; the latest published data, from 2007, estimated total

alcohol advertising expenditure in Australia to be \$128 million.<sup>45</sup> It's also known that in 2012, the top 20 alcohol brands in Australia produced 4,500 social media posts and had 2.3 million interactions with fans on Facebook alone.<sup>46</sup>

Children and young people spend an increasing proportion of their lives online. In 2015, 82 per cent of all teenagers (aged 14-17 years) were online in the previous four weeks and 80 per cent of all Australian teenagers used a smartphone. Teenagers are increasingly accessing the internet across a broader range of times during the day, with 74 per cent online between 5pm and 10pm and 28 per cent between 10pm and midnight.<sup>47</sup>

The emergence and growth of digital and social media in the 2000s created new opportunities for marketers of alcohol and other unhealthy commodities. Social media offers them several advantages – as well as being cheaper than traditional media, it is more suitable for market segmentation (targeted marketing), and more immune to parental supervision and government regulation.<sup>48</sup>

The 2014 report *Alcohol advertising: effectiveness of current regulatory codes in addressing community concern* by the Australian National Preventive Health Agency (ANPHA) outlined that alcohol advertising online is growing at an unprecedented rate and yet there are “few mechanisms to limit children’s and adolescents’ cumulative exposure to the volume of alcohol advertising that occurs frequently across different media channels”.<sup>49</sup>

It is clear that children and adolescents are being exposed to alcohol advertising online, but due to lack of regulation

and the targeted nature of online marketing, the scale of the problem is not known and government is currently unable to respond appropriately. Policymakers and regulators may not observe the scale of the problem first hand because advertisers undertake targeted marketing which means that they will not see what children and adolescents see. To better understand the situation, the incoming government should institute a review into the extent and impact of alcohol advertising, with clear terms of reference that include online advertising.

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### POLICY ASK

Introduce effective regulation to ensure that children using online spaces are protected from exposure to alcohol advertising and marketing.

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Stop the alcohol industry from setting its own rules, by replacing the self-regulatory system for alcohol advertising

Alcohol advertising across Australia is predominantly self-regulated by the alcohol industry. This is inappropriate and destined to fail because the alcohol industry has a clear conflict of interest arising from its business imperative to sell more alcohol.

A 2018 review of the updated advertising code created by the alcohol industry self-regulator –

the Alcohol Beverages Advertising Code (ABAC) – concluded that the Code was unlikely to reduce young people’s exposure to alcohol marketing and hence failed to meet public health objectives.<sup>50</sup>

To illustrate the failings of the current self-regulatory system with a recent example, in August 2018 ABAC dismissed a complaint about a school bus covered in a beer advert including the slogan “BEERS BY THE BUSLOAD”. ABAC ruled that the advert broke no rules of its ‘responsible’ advertising code.<sup>51</sup>

The ANPHA report states that “the Agency finds the current system to be inadequate” because it fails to protect children and adolescents from significant amounts of alcohol advertising.<sup>52</sup>

The ANPHA report recommended a review of the whole regulatory system for alcohol advertising, including the legislative provisions, co-regulatory instruments and self-regulatory elements. It recommended that this be conducted by 2016 but this has not transpired.

As part of a clear regulatory framework, alcohol producers should be mandated to publish their online advertising expenditure and coverage in order to ensure compliance with regulation and inform the development of policy directions.

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### POLICY ASK

Establish an independent regulator of alcohol advertising free of industry involvement to regulate content and placement and carry out enforcement.

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