



Foundation for Alcohol Research & Education



Submission to the National Sports Plan

July 2017



About the Foundation for Alcohol Research and Education

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

Alcohol harm in Australia is significant. More than 5,500 lives are lost every year and more than 157,000 people are hospitalised making alcohol one of our nation's greatest preventive health challenges.

For over a decade, FARE has been working with communities, governments, health professionals and police across the country to reduce alcohol harm by supporting world-leading research, raising public awareness and advocating for changes to alcohol policy.

In that time FARE has helped more than 750 communities and organisations and backed over 1,400 projects around Australia.

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.

About Bluearth Foundation

Bluearth Foundation is a national health promotion charity working to improve the health and wellbeing of Australians by making movement part of everyday life.

Currently each year over 16,000 Australians die prematurely each year due to conditions and diseases attributable to physical inactivity.

Established in 2000, Bluearth has delivered evidence based programs into almost one fifth of Australian primary schools reaching over 330,000 children and training thousands of teachers.

Working with Governments, leading academics and other community partners we focus on both increasing the awareness of the benefits of an active life and also building the capacity of individuals and organisations to increase activity levels. Bluearth is guided by the International Society for Physical Activity and Health's (ISPAH) Bangkok Declaration. The Bangkok Declaration is an advocacy tool and road-map for investment and actions to improve physical activity levels at the country, regional and global levels.

If you would like to further discuss Bluearth Foundation's work, you can contact us on (03) 9820 6300 or by email mail@bluearth.org.

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Overview

Sport is an essential element to the Australian way of life. It has the potential to instil core values of team work, resilience, respect, cooperation, as well as promoting healthy physical activity as part of everyday life. The development of the National Sports Plan will help continue the growth of sport in Australia through the promotion of active, healthy living.

The Australian Government is seeking to use the National Sports Plan to contribute to population health outcomes and reduce the burden of chronic disease. FARE and Bluearth support this goal and commend the development of the National Sports Plan to include a strong health promotion focus.

However, sport cannot be used as an effective health promotion tool while it continues to promote unhealthy products such as alcohol and junk food. Sport needs to provide a healthy environment and send healthy messages to the community in order to adequately address the growing burden of disease. Physical activity alone is not enough, it must be combined with the right environmental structures in order to truly be successful. The key outcomes for the National Sports Plan should be increased physical activity and the removal of unhealthy sponsorship from sport, including alcohol and junk food.

Chronic diseases are the leading cause of illness, disability and death in Australia, accounting for 90 per cent of all deaths in 2011, and has been described as Australia's greatest health challenge.¹ A third of chronic disease is preventable.²

This impact has been recognised by the World Health Organization (WHO), which has developed a set of global targets to achieve a 25 per cent reduction in premature mortality from chronic disease by the year 2025. Australia is a signatory to this plan. Australia has a strong international track-record in preventive health. However, Australia's investment by governments' in preventive health is declining as the population ages and the burden of chronic disease increases. The National Sports Plan can be used as an effective tool to boost prevention efforts and reduce this burden of disease.

Although, it should be noted that organised sport is only part of the solution to preventing chronic disease. Without change, sport will continue to be a double-edged sword – at one level promoting health by encouraging people to be active and on another being associated with the promotion of unhealthy products such as alcohol and fast food.

By creating healthy environments, promoting integrity through healthy sponsors and encouraging physical activity, the National Sports Plan will in turn increase its value proposition, authentically providing an activity that is wholly about health and wellbeing.

If the Australian Government focuses on prevention through promoting active and healthy living not only on the field, but also off the field, it will send a clear message about the value it places on the health and wellbeing of Australians.

This submission

This submission addresses two key areas, the first provides an overview of sports contribution to preventive health and provides specific recommendations for the Australian Government to adopt when developing the National Sports Plan. The second section of the submission directly responds to questions posed in National Sports Plan document.

Recommendations

1. The Australian Government should continue to endorse preventive health as a key pillar of the National Sports Plan to help address the growing burden of disease.
2. The Australian Government should separate the elite and participation arms of sport and establish a new entity with a clear focus on participation and preventative health.
3. The Australian Government should phase out alcohol and junk food sponsorship from sport.
4. The Australian Government should establish a replacement fund to support sports to introduce healthy sponsors. This can be done through alcohol tax reform, where the revenue raised will go towards supporting sports in removing alcohol sponsors and promoting ethical and healthy partnerships.
5. The Minister for Health and Sport should work with the Minister for Communications to standardise and legislate advertising regulations for all media platforms that are independent of the alcohol and advertising industries, thereby removing the current self-regulatory framework.
6. The Australian Government should legislate that alcohol advertising be banned between the hours of 5am and 8.30pm across all media platforms, including televised sport.

1. Sport as a vehicle for preventive health

1.1. Reducing the burden of chronic disease

The National Sports Plan can be used to contribute to population health goals and reduce the burden of disease. In Australia, sports participation is decreasing and the burden of disease is increasing.

One in two Australians suffer from chronic disease, which is responsible for 83 per cent of all premature deaths in Australia, and accounts for 66 per cent of the burden of disease.³ Chronic diseases are long-lasting diseases that have persistent effects and include heart disease, dementia, stroke, chronic kidney disease, lung disease, type 2 diabetes and cancer. Chronic diseases are also linked to a range of mental health conditions such as depression and anxiety.⁴ A third of chronic disease is preventable and can be traced to four modifiable risk factors: alcohol consumption, tobacco use, physical inactivity and poor nutrition.⁵

Treating chronic disease is estimated to cost \$27 billion annually, accounting for more than a third of our national health budget. Yet Australia currently spends just over \$2 billion on preventive health each year, or around \$89 per person.⁶

Sport is an integral part of Australian culture and sets the foundations for a healthy lifestyle. Children who grow up playing sport are 10 per cent more likely to remain active as adults, supporting the argument that playing sport as a child can lead to a life-long habit of physical activity.⁷

Prevention is important because of the potentially debilitating impact of a range of short-term and long-term conditions and the costs associated with these. By preventing these conditions from developing, the government can avoid the costs to the health care budget of managing complex conditions later on. Studies have found that for every \$1 invested in food and nutrition education, there is a \$10 return in reduced healthcare costs⁸ and every \$1 invested in infrastructure to increase cycling in the community, leads to a \$10-\$25 benefit.⁹

Sport delivers significant health and productivity benefits and can have an extremely positive role in people's lives. This can be seen through physical activity, increased mental health, comradery and friendship.

Future directions

The active use of the National Sports Plan as a health promotion tool can reduce Australia's burden of disease. This can be achieved not only through increased physical activity but also through delivering healthy messages to both viewers and participants.

Moderate amounts of exercise have been shown to reduce depression and mental health disease as well as slow the onset of dementia.¹⁰ Playing sport allows you to be physically active which in turn reduces the risk to chronic disease.

There is clear evidence of the contribution moderate to vigorous activity makes to chronic disease prevention. Sport, traditional and non-traditional is one of the ways in which people experience more vigorous activity levels reducing their risk of chronic diseases such as diabetes, coronary heart disease, colon and other cancers.

The *Intergenerational Review of Australian Sport 2017* states "if nothing is done to curb the growth of obesity, one study predicts Australia will face \$88 billion of extra health and social cost over the next 10 years".¹¹ The Australian government has the opportunity to positively impact people's lives and

reduce the impending costs to the community by using the National Sports Plan as a health promotion tool that addresses chronic disease.

If sport stays informed by health and is used effectively as a health promotion tool, it will in turn generate increased participation, competition and performance. It is essential that the focus of participation in sport is not just at the elite level and consideration is given to community participation. The current governance arrangements for both elite and community sports need to be addressed to enhance participation levels in sport.

It is encouraging to see preventative health included as one of the core pillars of the Plan. This recognises the role of sports in improving health outcomes, and acknowledges that our view of sport needs to be broadened if indeed we are to achieve significant changes in participation levels.

Recommendations

1. The Australian Government should continue to endorse preventive health as a key pillar of the National Sports Plan to help address the growing burden of disease.
2. The Australian Government should separate the elite and participation arms of sport and establish a new entity with a clear focus on participation and preventative health.

1.2. Sending healthy messages with sport

Sport sends contradictory messages through unhealthy sponsors. The National Sports Plan aims to tackle physical inactivity and obesity through increased participation in sport. However, there is an obvious contradiction in values here when the aim is to promote a healthy lifestyle and to tackle obesity through sport, yet we see elite athletes promoting products such as alcohol and junk food, that are unhealthy and contribute not only to obesity but also inflict significant harm to the community.

Alcohol sponsorship of sporting teams and events has become more prominent and of increasing concern to the community. The major sponsors of the Australian Football League (AFL), National Rugby League (NRL) and Australian Rugby Union (ARU) are *Carlton Draught*, *VB* and *Hahn Super Dry* respectively. In Tennis the Australian Open was sponsored by *Jacob's Creek* and the F1's major sponsor was *Heineken*. Sports sponsorship and advertising is saturated by the alcohol industry. What is of greater concern is that alcohol advertising is self-regulated through a myriad of industry codes.

Alcohol has become deeply embedded in the Australian sporting culture and lifestyle. The idea of drinking as a group enhancement activity has been manipulated by the alcohol and sporting industries to establish a co-dependency between alcohol and sport. People think you cannot have one without the other, but that is not the case. Netball Australia and Swimming are examples of sports which promote healthy products. Neither is sponsored by an alcohol brand.

Alcohol is one of the most heavily promoted products in the world.¹² Alcohol advertising contributes to the normalisation of alcohol use and reinforces the harmful drinking culture that currently exists in Australia.¹³ Alcohol harm is significant, resulting in more than 5,500 lives lost and 157,000 hospitalisations each year in Australia.¹⁴ Alcohol is also the major contributor to the three leading causes of death among adolescents; unintentional injuries, homicide and suicide.¹⁵ The social and economic costs to the community as a result of alcohol are insurmountable.

Alcohol sponsorship of sporting events is resulting in children and young people associating alcohol with sport.^{16,17} An Australian study of 164 children aged 5 to 12 years found that 76 per cent were able to correctly match at least one sport with its relevant sponsor.¹⁸ Alcohol advertising during sport is

extensive, has features that appeal to children, and instils the idea that consumption of the alcohol product is associated with sport as well as positive personality traits and success.¹⁹

An estimated cumulative audience of 26.9 million Australian children and adolescents watching Australia's major televised sporting codes, AFL, Cricket and NRL sports are exposed to 51 million instances of alcohol advertising, with nearly half (47 per cent) of these broadcast during daytime programming between 6am and 8.30pm.²⁰

Junk food advertisements and sponsorship is also a concern. The exposure to the promotion of unhealthy food, including through local and elite sport sponsorship, affects children's food perceptions and preferences, impacting on their food preferences and diets. Systematic reviews of the evidence on food marketing to children, including through sport, have consistently concluded that it influences the types of food children prefer, demand and consume, and is likely to contribute to poor diets, negative health outcomes, weight gain and obesity in children.²¹

McDonald's is one notable early adopter of sports sponsorship as a vehicle to enhance its image and achieve national and international visibility. As an Olympic sponsor from 1976, McDonald's was reported as perceiving the Games as a vehicle to increase its global marketing efforts.²²

The National Sports Plan aims to use sport as a preventive health measure for keeping Australians active and healthy. However, all the values of healthy living are contradicted when viewers and participants of sport are bombarded by unhealthy images of alcohol and junk food advertising at sporting grounds and on the TV.

The Australian community wants to see more done to minimise the harmful impacts of alcohol advertising with two thirds (68 per cent) supporting a ban on alcohol advertising on television before 8.30pm.²³ There has also been an increase in the call for a ban on alcohol sponsorship at sporting events, with 55 per cent of Australians supporting the call.²⁴ A VicHealth survey also found large numbers of support, with 83 per cent supporting the removal of alcohol sponsorship from clubs if help was given to replace lost revenue and 76 per cent supporting a levy on alcohol advertising if the funds generated were directed back to community sports.²⁵

Almost seven out of ten Australian adults (69 per cent) believe the sponsorship of children's sporting activities by fast food chains such as McDonald's and KFC should be restricted, if not stopped entirely.

Similarly, more than half (55 per cent) of adults want to see government restrictions on unhealthy food sponsorship of sporting events that may be watched by children, outlined in the public opinion research by the Obesity Policy Coalition (OPC).

Australia is a signatory to WHO's recommendation that children's settings are free of unhealthy food promotions and branding, including through sport, yet we continue to see unhealthy messaging occurring due to widespread unhealthy sponsorship of children's sport, particularly at the State and local level.

If the Australian Government wants to use sport as a health promotion activity, the messages we send the Australian community must be healthy.

Alcohol advertising and sponsorship regulations

There is growing community concern about the harmful impacts of alcohol advertising, particularly during sporting programs where millions of children are subjected to the advertising of a product they legally cannot consume.

Currently there is a self-regulated system for alcohol advertising across Australia, meaning that the advertising regulators, alcohol industry and government handle complaints and noncompliance jointly. The Advertising Standards Bureau (ASB) assesses complaints under the Australian Association of National Advertisers (AANA) Code of Ethics and forwards these complaints to the Alcohol Beverages Advertising Code (ABAC) Chief Adjudicator.²⁶ Both the ASB and ABAC decide individually if the complaint comes under their jurisdiction and is worth pursuing. Free to air, pay TV, radio and internet advertising all come under their own codes of practice. This complex arrangement of regulatory codes means that there is no one body with responsibility for the content and placement of alcohol advertising.

Commercial television (free to air)

The placement of alcohol advertising is controlled under the *Commercial Television Industry Code of Practice* (The Code) and the Australian Communications and Media Authority (ACMA). The Code prohibits the advertising of alcohol with the exception of live sports broadcasts, as an accompaniment to a non-live sports program on a weekend or public holiday and also during M and MA15+ classification zones (except between 5am-6am and 7.30pm-8.30 pm).²⁷

As described in The Code, an alcohol commercial does not include:

- program sponsorship announcements which make no direct reference to the price of goods or services
- a commercial which does not directly promote an alcoholic drink for an entity or company that participates in the manufacture, distribution or sale of alcohol
- a commercial where alcohol or a brand associated with alcohol is incidental and any alcohol consumption responsibly depicted
- a commercial for a licensed restaurant or club, entertainment venue, tourist attraction or dining establishment.

Subscription television (Pay TV)

Alcohol advertising is controlled by the *Australian Subscription Television and Radio Association Codes of Practice 2013*. There are no timing controls on alcohol advertising on subscription television only that “The Licensee must take into account the intellectual and emotional maturity of the intended audience of the channel when scheduling advertisements”.²⁸

Internet and social media

There is currently no regulation that restricts the placement of alcohol advertisements on the internet. Social media platforms may have self-regulated advertising policies which restrict advertising content, however policies vary and refer to advertisements being appropriately targeted, can have ambiguous wording and largely rely on the goodwill of advertisers to comply.

Radio

The *Commercial Radio Code of Practice March 2017* has no restrictions on the advertising of alcoholic products. The only vague constraint in place states “Material not suitable for broadcast.... presents as desirable the misuse of alcoholic liquor”.²⁹ Subscription radio has no restrictions on alcohol advertising.

Sponsorship

There is no regulation when it comes to alcohol sponsorship of sports. Sponsorship is not classified as a form of advertising under any broadcast codes of practice. The ABAC code also does not apply to sponsorship which is defined as:

“any agreement or part of an agreement involving payment or other consideration in lieu of payment by a Marketer to support a sporting or cultural property, event or activity, in return for which the sponsored party agrees to be associated with or promote the sponsor’s Alcohol Beverage or outlet. Sponsorship also includes naming rights of events or teams and the inclusion of a brand name and/or logo at an event venue or on uniforms of participants (excluding branded merchandise).”³⁰

Junk food marketing regulations

Food advertising is self-regulated by AANA, ASB, the Australian Food and Grocery Council’s Responsible Marketing Initiative to Children (RCMI) and the Australian Quick Service Restaurant Industry’s Initiative for Responsible Advertising and Marketing to Children (QSRI). The advertising and food industries’ codes create the appearance of responsible conduct but fail to impose any meaningful restrictions on the advertising of unhealthy products.

The codes only apply to advertising during programs that are ‘directed primarily to children’. This fails to include programs such as Master Chef, Modern Family and the Simpsons which are the most popular among children. Not only do the codes fail to cover programs that have multiple target audiences, they also do not cover all forms of promotion (such as websites and direct marketing), they fail to protect all age groups as the codes do not apply to children aged 14-18 years, they only apply to signatories not all food advertisers and breaches are rarely if ever sanctioned.

The only government regulations dealing with advertising to children is the Children’s Television Standards (CTS), which only apply to free-TV programs rated ‘P’ or ‘G’. They restrict promotions of premium offers such as free toys and advertisements by popular characters or personalities. The only provision dealing specifically with food advertising states that information about nutritional value cannot be misleading or incorrect. Once again these regulations do not apply to higher rated children’s programs (e.g. ‘PG’), they do not cover all forms of promotion and compliance is not monitored.

Future directions

One of the focuses of the National Sports Plan is to use sport to achieve population health goals through preventive health measures that will reduce the burden of chronic disease in Australia. Alcohol and junk food consumption is two of the four modifiable risk factors to chronic disease. By addressing these issues and dissociating alcohol and junk food with sport, the National Sports Plan can contribute to the prevention of chronic disease and positively impact not only sports participants but also sports viewers.

This can be achieved through the following:

1. Phase out alcohol and junk food sponsorship from sporting and cultural events.

While the playing of sport should be encouraged among children, the promotion of alcohol in association with sport, should not. A transitional approach to phasing out alcohol and junk food sponsorship and advertising will provide industry with enough time and flexibility to amend current contractual arrangements and other business practices before the implementation of legislation. This will ensure that there are no significant economic disadvantages and allow plenty of time to look for new socially responsible sponsors.

Many countries have already successfully removed alcohol sponsorship from sport without any significant impact including France, Qatar, Norway, Denmark, Croatia, Russia and more.³¹ France successfully held the Heineken Cup Rugby competition, renamed H-Cup in France, as well as the UEFA Euro 2016. Furthermore, the upcoming Football World Cups hosted in Russia (2018) and Qatar (2022) suggest that the removal of alcohol sponsorship does not diminish sport or the capacity to host international sporting events.

Sport is a health promotion activity and its association with unhealthy products such as alcohol and junk food is counter-intuitive at best and harmful at worst. This type of marketing is visible to children and young people, as sporting events are often held or televised during times when they are likely to be watching or in attendance at the event.

To allow time for adaptation, an Alcohol Sponsorship Replacement Fund may facilitate the phasing out of alcohol sponsorship in sport. This should be funded by the proceeds of alcohol tax reform. Given the current levels of alcohol sponsorship, a relatively modest investment of \$100 million over four years would allow sufficient time for sporting codes to adjust. Alternative sponsors will be readily available. In NRL, for example, the value of the most recent contract with Telstra (\$6.5 million) was more than four times greater than that of the largest alcohol sponsor (Carlton United Brewery, \$1.5 million). Sport has successfully transitioned away from reliance on tobacco advertising. It is now time to end its links to alcohol brands.

2. Standardise and legislate advertising regulations for all media platforms.

Regulation of alcohol and junk food marketing and promotion should be standardised, legislated and independent of the alcohol, food and advertising industries. The current systems of self or co-regulation does not work.

The primary purpose of advertising is to increase sales, thereby increasing the amount of alcohol consumed either by more people or in greater amounts among drinkers.³² The entire premise of alcohol advertising is contrary to community health standards. Vulnerable groups, including children, are the object of direct marketing strategies to promote alcohol and junk food, however, a lack of transparency regarding these industry's marketing strategies limits research on which groups and what ways groups are targeted.³³ This supports the notion that self-regulation creates loopholes and does not protect children from unhealthy marketing.

The Pan American Health Organisation *Technical Note* on alcohol marketing (recently published in conjunction with the World Health Organization), states that the objective of alcohol marketing regulation is to reduce alcohol harm by reducing or eliminating exposure to alcohol sponsorship, promotion and advertising.³⁴ This particularly applies to those vulnerable to alcohol harm, through the reduction of early initiation to drinking by young people and reduced promotion of drinking to people with a history of alcohol dependence, indigenous people, LGBTQ, pregnant women and impulsive, sensation-seeking individuals.^{35,36,37}

A reduction in chronic disease and the harm caused by the consumption of alcohol and junk food can be achieved by regulating content, frequency and placement of advertising on all media platforms, including online and social media. Regulations should be flexible enough to cover new and evolving digital marketing and advertising methods and sanctions should be introduced for serious or persistent non-compliance.

Recommendations

3. The Australian Government should phase out alcohol and junk food sponsorship from sport.
4. The Australian Government should establish a replacement fund to support sports to introduce healthy sponsors. This can be done through alcohol tax reform, where the revenue raised will go towards supporting sports in removing alcohol sponsors and promoting ethical and healthy partnerships.
5. The Minister for Health and Sport should work with the Minister for Communications to standardise and legislate advertising regulations for all media platforms that are independent of the alcohol and advertising industries, thereby removing the current self-regulatory framework.
6. The Australian Government should legislate that alcohol advertising be banned between the hours of 5am and 8.30pm across all media platforms, including televised sport.

2. Responses to questions in National Sports Plan

2.1. Participation

How should sporting organisations evolve the way their games are played or the products/variations they offer to ensure we get and keep more Australians active?

There are already a wide range of organisations that operate outside of traditional national and state sporting structures that provide people with flexibility of activity options. This highlights the need to have a broader and more inclusive definition of sport.

It is also important to have a clear audience. Many offerings within the sports space potentially only cater for those that are already active. Defining a clear audience/s will then assist in determining the variations required. If this doesn't occur then there is the potential to just provide further opportunities for those that are already active, rather than changing the base line.

Internationally there are some good examples of strategies that have targeted those who have low activity levels such as walking football.

In general games/activities where participants have positive social experiences and opportunities for social connectedness are more likely to have high participation.

It is also important to build on the international knowledge base. The achievements of Sport England and Public Health England provide some clear learning in regard to having:

- a clear audience – those least likely to be active
- a standardised consistent performance measure – minutes of daily activity per person
- a multifaceted approach – awareness raising, capacity building of professionals, program delivery
- a life course approach.

The work undertaken by VicHealth in promoting innovative thinking within sport, while yet to deliver population level results, is also positive. VicHealth is building the capacity of the system to be innovative and explore and develop new ideas.

How do we make sport and physical activity part of everyone's daily routine?

To increase activity levels each day we need to look at the environments in which people live and work.

Importantly, we need to consider how they travel to and from work or school, what opportunities there are to be active at work/school and then what opportunities exist in our built and lived environments. Within each of these settings, there are opportunities to introduce long-term strategies to increase activity levels. These include:

1. Develop an active transport strategy by investing in walking, cycling and public transport.
2. Provide incentives for workplaces and schools to introduce a Move More Sit Less culture.
3. Support built environments to require all new developments to be assessed through a physical activity lens to ensure they promote rather than deter physical activity.

There is also a growing body of evidence of interventions that can work to improve participation levels. These include the types of programs highlighted above, whole of school programs, transport design, policies and programs, urban design (particularly walkability as a design element) and programs that focus on sport for all.

How can sports better reach under-represented groups?

First, and importantly, we need to ensure they have a voice in the development of the National Sports Plan. It is also important to understand the community drivers of participation. This aspect is relevant to all stakeholders involved in the National Plan. We need to be able to speak in many different languages: the language of education, the language of health, the language of community sports providers, and the language of transport to assist us in understanding what outcomes others are seeking. Participation in sport and physical activity may be the vehicle rather than the outcome.

For under-represented groups, it is also important to recognise and value existing ways of being active. The TAFISA's (The Association For International Sport for All) Traditional Games is one innovative program that encourages and supports a more inclusive approach to sport. This strengths based approach, recognising what communities have to offer and building on it, has been successfully applied to a range of delivery settings.

What is the role of non-traditional sport providers in helping to increase participation in sport?

Providing the population with a wide range of participation opportunities will always be beneficial as this enables citizen to choose how they want to be active. Often also organisations that are not constrained by international and national structures and governance are more easily able to be nimble and adapt quickly to changing customer demands. Given the Ausplay data indicates the most popular activities for men and women are walking and fitness activities, it also highlights the critical relationship between local Government and state Government, as major providers of footpaths, urban design and outdoor fitness opportunities.

However, the other important aspect of non-traditional providers is the consideration of issues outside the traditional domain of sport.

Given all the players, it would be beneficial to have a national advisory and advocacy agency focussed on Physical activity. At the moment the leadership and drive for physical activity is predominately

driven by disease prevention agencies. While they are very important players, having a broad based advisory and advocacy agency will enable a stronger multi-sectoral approach.

UKActive is an example of an agency that drives campaigns, research, partnerships and innovation which could be a model for what could be initiated in Australia.

How do we increase sport participation in the schooling years to maximise physical literacy and establish good habits for life?

Ensuring young children have the opportunity to explore and enjoy movement from an early age will go a long way to increasing lifelong participation. However, it is important to remember that the activity levels of parents also have a strong impact on children's activity levels.

Sport in its traditional form may not be the most appropriate vehicle to engage children in physical activity for life. Broad based movement programs, which provide opportunities for exploration and reflection that improve physical literacy are more likely to provide a strong foundation for future participation and an active life.

One example is the playgroup and preschools program delivered by Bluearth Foundation. This program provides positive early experiences with being active and supports children to be ready to meet the demands of school.

There is now strong evidence that enhanced school based physical education improves activity levels, delivers health outcomes and improves academic performance. When considering any intervention in the education sector it is essential that we consider the contribution physical activity makes to educational outcomes and use the language of education when seeking buy in.

It is also important to remember that in addition to the delivery of physical education programs, there are significant opportunities to enhance daily movement. The WHO Health Promoting Schools framework which guides Bluearth's work in schools, recognises that opportunities exist in relation to travel to and from school, active learning in class (including movement snacks), school policy and access to equipment, as well as teacher behaviour all have the potential to improve participation levels.

Encouraging and supporting a Move More Sit Less culture at schools, recognises and values movement as a tool to support children's learning and development.

It is clear that teacher capacity regarding both physical education and using movement to support learning is in need of investment. The NSW Auditor General's Report on compliance with mandatory physical activity, highlighted that primary teachers are not meeting mandatory PE guidelines due to lack of skills and confidence.

A positive initiative to address this issue is the decision at Deakin University to train all education students in physical education, given it is often generalist teachers that are delivering physical education. This should be expanded to all Education students across all Universities.

2.2. Prevention through physical activity

How do we ensure that the key benefits of sport and physical activity such as physical and mental health, personal wellbeing and community cohesion are promoted by governments and the community?

The benefits of physical activity are well documented and the evidence is continually growing. For sport, there are particular benefits that are often attributed to participation in sport, development of self-discipline, responsibility, cooperative behaviour, self-regulation and respect. Yet there are also many public incidents, involving elite sportspeople which demonstrate the opposite. Having a national code of behaviour for sport may assist in addressing this issue.

Apart from addressing the inconsistencies in sports behaviour, there are three key challenges:

- a. In order for the benefits to lead to behavioural change, the benefits must be immediately and personally relevant. The benefits need to be tailored to specific audiences (i) across the life stage, (ii) by gender, (ii) by socio-economic status, and (iv) by cultural and linguistic diversity.
- b. The messaging needs to be clear, simple to understand and consistently used across government and community. Rather than each entity creating its own messaging, we all need to agree on and use the same key umbrella messages. For this to occur, sport needs to be seen as part of the whole, if indeed our aim is to increase population activity levels, then sport is a contributor but is by no means the only player.
- c. Present the benefits relevant to the sector and the audience – using the language of the sector you are operating in. These include environmental benefits of active transport, educational benefits of active schools, and social benefits of community participation.

How should we raise awareness of the benefits of sport to the Australian public?

Any campaign or promotional activity needs to be supported with community infrastructure and programs as well as activities that enable people to be active in the way they choose.

The campaign needs to be delivered to the mass market with multiple channels and importantly be part of an overall plan. It is essential that people are encouraged and supported to participate in the way they choose, as such it makes sense for any campaign to be inclusive of all physical activity and not just specific to sport.

For a social marketing campaign to be effective it must be multi-faceted and use a range of media to promote its key messages. This includes broadcast media, digital media, and signage in and around not only sporting venues but a variety of public spaces. The campaign should also be reinforced with more formal messaging in other settings, such as school-based educational programs. It is also essential that a social marketing campaign has a clear target and message. The campaign rationale must clearly identify the target audience and the behaviour change sought. Understanding the target audience includes securing information about their knowledge, attitudes and current behaviours relevant to the social marketing campaign's objective.³⁸

Ensuring sport and the community sector has the capacity to meet any increase demand is also an essential aspect of any campaign. Along with a call to action, people need to know that there will be footpaths and cycleways put in places, there are local service providers that will welcome and support their participation, their doctor will know about the campaign and understand her/his role.

The National Sports Plan combined with a national physical activity strategy/plan will provide the umbrella for this to occur.

How do we use the reach and influence of sport to get more people active – especially people with sedentary lifestyles?

Sport plays a significant and influential role in Australian culture yet the vast majority of us have very low activity levels. Given that many Australians are sports fans and supporters rather than participants, this provides us with an opportunity to more actively embrace fans and offer participation opportunities. The EuroFit programme is an example of embracing fans to increase participation by allowing fans to train in the environment of a professional football club they support.

It is also important to provide an opportunity to set leadership at the local level. In NZ, the local led delivery approach rather than the traditional top down approach is delivering benefits. This enables the power to be located where the passion is and ensures there is a high level of ownership to local delivery.

As with all aspects of the National Sports Plan, having a clear target audience is the starting point. The impact of a multifaceted strategy approach has been demonstrated through the Public Health England approach, which has approached the challenge by addressing the following domains: 1) Active Society, 2) Moving Professionals, 3) Active Environments, 4) Moving at scale.

Sport itself and organisations such as the Australian Sports Commission will need to work in partnership with other physical activity providers and other sectors to ensure the potential reach and influence of sport is achieved.

The capacity of the sports sector to appropriately cater to those who are least likely to be active, particularly those with medical issues, and those from different cultural backgrounds and ability levels, needs to be significantly enhanced. Driving people to increase activity levels when the system is not there to support there is fruitless.

How do we ensure sport delivery bodies (e.g. Australian Sports Commission, State Departments of Sport and Recreation, National Sporting Organisations etc.) and health promotion organisations work together as effectively as possible to improve population health?

It is important to:

- establish a clear and agreed vision, goals, outcomes and performance measures that all agencies are working towards.
- secure tied Budget allocation for the National Sports Plan that is allocated across agencies. This would need to be replicated at both the State and National level.
- co-locate agencies or agency staff wherever possible to facilitate a collegial working environment.
- require all agencies to adopt a participant centred approach and establish detailed consumer involvement strategies from the beginning of the process. Prior to the National Sports Plan being finalised it would be ideal to ensure a consumer involvement strategy, so end users have the opportunity to be involved from the development of the plan right through to implementation and evaluation. This is aligned to the growing body of evidence that highlights the benefits of service recipients being involved in co-creating services rather than being passive recipients.

2.3. Integrity

What are the best arrangements for the Australian Government's sports integrity capability to ensure Australian sport is effectively protected against integrity threats?

The Australian Government states that "the Plan is about maintaining vigilance to keep unwanted elements out of Australian sport".³⁹ Integrity remains a vital element of sport and it is important to ensure that Australian sport upholds integrity and is protected from any threats.

Australian sport has faced many threats to its integrity through negative press about elite athletes' consumption of alcohol and drugs. Examples are countless and can be found across all sports from NRL, swimming, cricket and even tennis. This type of negative publicity is detrimental to the integrity of sport. The sports industry expresses concern about players relationships with alcohol yet continues to promote the product heavily not only in the stadium but across the players' chests.

Alcohol sponsorship of sport has an impact on both players and spectators. It is associated with hazardous drinking by those playing the sport⁴⁰ and communicates strong messages about alcohol brands and drinking that are absorbed by children.

It is important for sport to provide the right foundations for integrity through ethical and healthy sponsors. Without this positive environment, sport cannot effectively promote integrity whilst simultaneously promoting unhealthy products like alcohol. This inherent contradiction undermines the value of integrity in sport.

The *Intergenerational Review of Australian Sport 2017* says that sport plays a key role in changing social attitudes.⁴¹ Sport has done this through programs and campaigns against homophobia, domestic violence, racism and other social issues. Sport now has the opportunity to address the insurmountable amount of harm that alcohol inflicts on the community by discontinuing its promotion. By sport promoting alcohol on the jerseys of players and in stadiums they are inadvertently contributing to the harm.

The National Sports Plan can promote integrity and change social attitudes by disassociating alcohol and sport. Through phasing out alcohol sponsorship from sport, the National Sports Plan can continue to keep sport healthy. Alcohol companies in partnership with sport does not send the message of integrity and health to our communities.

2.4. Governance

What should be the respective roles for national, state/territory and community sporting organisations to grow Australian sport?

Given the variation in responsibility driven by existing federal, state and local governments, this provides some structural framework for responsibilities to be shared.

Importantly, prior to determining roles, we need to seek clear agreement on the vision, goals, outcomes and performance measures within the National Sports Plan and indeed a broader National Physical Activity Strategy.

Government at all levels should be better enabled to support a multi-sectoral, multi-level approach through tied funding (ring fenced across agencies), singular Ministerial accountability.

Funding should be directed to those who are positioned to deliver outcomes or who are willing and able to build the evidence base, with a strong focus on partnership and collaboration.

How can sporting organisations (national, state/territory, community) better play a role in getting more Australians active?

Sport has a role to play but is more likely to be successful if the model is not contained to traditional sporting structures. Investment in sport should be driven by the National Plan for Sport with a clear goal of increasing participation.

Funding should then be allocated based on achievement of outcomes. To achieve population change, the Plan will need to be a long term plan, beyond the term of Government. As such, a cross party agreement will be essential for future success.

Given this is not the responsibility of one single agency nor one level of Government, cross agency and cross Government agreement is imperative.

Most importantly, there needs to be an independent body to have oversight and ensure accountability for progress on both the development and implementation of the National Plan of Action at both a national and local level.

2.5. Sources of funding, including national lottery

Given governments have limited budgets how should they allocate funding across high performance and community sport?

The needs of high performance sport and community participation are very different and to a degree there has always been tension between these two arms of the Australian Sports Commission. The Commission, through the Sports Commission Act, has always driven its work through traditional sports structures, but this is at odds with where community participation occurs. Community participation is increasing outside traditional sport.

To both address the internal tensions, and also to enable a broader more inclusive approach to physical activity beyond traditional sport, it is recommended that Elite sport is separated from community participation and preventative health and a separate agency is formed. This also enables all funding related to participation and preventative health to be brought together, rather than participation always being the poor cousin of elite performance within the Australian Sports Commission. (Currently the split is 83 per cent elite and 17 per cent community participation).

Do you support the introduction of a national good causes lottery to increase the funding available for Australian athletes and to increase participation in sport?

Internationally there are many countries that have successfully used national sports lotteries to increase funding to sports, however if this is to occur funding should be allocated to community participation. It is also important to ensure that the structure of the lottery does not further contribute to social issues arising from gambling.

Any form of gambling, including a national sports lottery presents potential risks to social and personal harm. A study from the US found that the lowest 20 per cent on the socio-economic scale spent more than twice the amount on lottery tickets as the top 20 per cent.⁴² Lotteries encourage gambling within our more disadvantaged communities that have the most to gain but also the most to lose. The 2009 report from the Independent sports panel (ISP) concluded that a national sports lottery was not

warranted as there are already enough opportunities available for people to engage in gambling.⁴³ The negative implications of a national sports lottery should be carefully considered by the Government.

There are also other potential negatives of a lottery including funding allocation which would be heavily determined by subscriptions and not by the needs of the sporting community or by government priorities. Those that can afford more entries are more likely to receive funding.

The national sports lottery could also be used initially to support to the transition to healthy sports sponsorship, providing an alternate interim funding stream.

What other forms of non-government revenue could be used to help Australian athletes and increase participation in sport?

Tax reform related to both alcohol and also sugary drinks in the short term could provide an alternate funding stream for sports as they move away from unhealthy sports sponsorship. In the longer term, revenue from both of these measures can be directed to improving community participation.

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