

Free TV Australia
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Feedback on Commercial Television Industry Code of Practice

To whom it may concern

Thank you for the opportunity to provide feedback on the *Commercial Television Industry Code of Practice*.

NSW Health's Centre for Alcohol and Other Drugs is concerned that extending hours of M classified content would also increase alcohol advertising exposure, particularly to children and young people. Extending the M classification zone would permit alcohol advertising over longer periods of the day, including weekends, school holidays and public holidays.

Minimising alcohol-related health harms is a priority for NSW Health. There is a well-established relationship between exposure to alcohol marketing, underage drinking and normalising drinking culture.ⁱ Alcohol promotion encourages consumption, triggers positive product evaluations into adult life and embeds alcohol products as a norm.

While the legal drinking age is 18, the M classification zone would expose children and young people aged 15 – 18 years to increased alcohol advertising. Children are less able to distinguish harmful representations through media and are highly impressionable to product branding and positive perceptions of alcohol.ⁱⁱ

Alcohol is responsible for significant health harms, accounting for 4.5% of the total national disease burden, and is the most reported principal drug of concern for those entering treatment.^{iii iv} Globally, among people aged 15–49 years, alcohol use was the leading risk factor for deaths and loss of healthy life years in 2016.^v

If M classified content is extended, Free TV should ensure this does not include alcohol advertising. Free TV should also consider if current restrictions on alcohol advertising on streaming services are sufficient.

This aligns with the World Health Organisations' recommendations to introduce restrictions on alcohol advertising, sponsorship and promotion, and prevent marketing of zero and low alcohol products to children to reduce health harms.^{vi}

Limiting alcohol advertising exposure also aligns with Australian community expectations. According to a 2023 survey by Alcohol Change Australia, 63% of respondents were concerned about the amount of alcohol advertising they see in the community, and 77% support restricting alcohol advertising on TV during times when children are likely to be watching, including during sports broadcasting.^{vii}

Thank you for the opportunity to provide a submission. Please contact [REDACTED] if you would like further information.

Yours sincerely

[REDACTED]

[REDACTED]

18 November 2024

ⁱ Sargent JD, Babor TF. (2020). The Relationship Between Exposure to Alcohol Marketing and Underage Drinking Is Causal. *Journal of Studies on Alcohol and Drugs Supplement* [Internet]. 2020; (Suppl 19):[113-24 pp.].

ⁱⁱ Pettigrew, S., Grant, H., 2020. Policy implications of the extent, nature and effects of young people's exposure to alcohol promotion in sports-related contexts, *Evidence Base Issue 2 Vol 2020*

ⁱⁱⁱ Australian Institute of Health and Welfare, (2021). *Australian Burden of Disease Study 2018: Interactive data on risk factor burden*.

^{iv} Australian Institute of Health and Welfare, (2022). *Alcohol, tobacco & other drugs in Australia, 2022*.

^v Griswold, M. G., N. Fullman, C. Hawley, N. Arian, S. R. Zimsen, H. D. Tymeson, V. Venkateswaran, A. D. Tapp, M. H. Forouzanfar and J. S. Salama (2018). "Alcohol use and burden for 195 countries and territories, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016." *The Lancet* 392(10152): 1015–1035.

^{vi} World Health Organization. (2017). Best buys and other recommended interventions for the prevention and control of noncommunicable diseases. WHO. Available at: <http://www.who.int/ncds/governance/appendix3-update/en/>

^{vii} Alcohol Change Australia, 2023, "Public Opinion on Alcohol in Australia: Knowledge, attitudes, and support for change", https://alcoholchangeaus.org.au/wp-content/uploads/2023/11/AlcoholChangeAustralia_Report_FINAL.pdf