

Free TV Australia
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Dear Free TV Australia,

This submission is in response to the public consultation on the draft '*Commercial Television Industry Code of Practice*' (the Code).

At Injury Matters, we innovate and deliver injury prevention and recovery solutions that empower individuals, organisations and policymakers across WA to make smarter, safer choices. Moreover, we share equally critical research that enables agencies and policymakers to make informed policy decisions that help mitigate the personal and broader economic impacts and knock-on effects that injuries have.

We understand the harm that inadequate regulation can cause and welcome the opportunity that the current consultation provides to reduce the harm caused by advertising and reporting distressing content.

Australians should have the opportunity to be healthy, safe and free from the many ways that alcohol causes harm to people, families and communities. Yet tragically, Australia is currently experiencing the highest rates of alcohol-induced deaths in over 20 years.¹ Alcohol marketing, including broadcast advertising, influences people's preferences, attitudes, social norms and use of alcohol products, which subsequently impacts on community health, safety and wellbeing.

Health impacts of alcohol include hospitalisation and deaths from injury and other acute and chronic diseases, like cancer and mental ill-health. Alcohol also causes alcohol-related brain injury and Fetal Alcohol Spectrum Disorder (FASD).

Alcohol is also a significant factor in family and domestic violence.² There are several studies that show that violence involving alcohol increases at the time of football grand finals and the State of Origin.^{3,4} 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*".⁵ They based this recommendation on "*the statistical increase in DFSV incidents during football grand finals, as well as the high number of children who watch sport on television and mobile apps*".

Considering this recommendation, and the evidence showing that when children are exposed to alcohol advertising, they are more likely to start drinking early and to drink at higher risk levels,^{6,7} broadcast alcohol advertising should be reduced, not increased.

Children are frequently exposed to harmful alcohol advertising.^{8,9,10} Yet the draft Code proposes extending the hours that alcohol advertising can be shown to children by over 800 hours per year. Even more concerning is the proposal that these ads be shown during the daytime on school holidays, weekends and public holidays, when children are more likely to be watching alcohol advertising. Weekends and public holidays are also times when alcohol harms are more likely to occur.¹¹

Recommendation 1. Ensure that any changes to the *Commercial Television Industry Code of Practice* (including to the 'M' classification zone in Section 2.2.2), do not extend the hours when alcohol advertising is permitted to be broadcast.

This is in addition to the existing loophole where restrictions on alcohol advertising do not apply during the broadcast of sports programs on public holidays and weekends. This loophole increases alcohol advertising at higher risk times – during sporting events which are associated with increases in family and domestic violence.^{12,13} Companies tie these events into their branding during these events to maximise sales and profits during times that are most harmful. They even boast about the increase in sales during these times.¹⁴

Recommendation 2. Remove the exemption in Section 6.2 that allows alcohol advertising during sports broadcasts.

Recommendation 3. Remove the exemption in Section 8 of '*program sponsorship*' from alcohol advertising, that allows the promotion of alcohol companies during program broadcasts.

Injury Matters strongly opposes the proposed changes to the M Classification zone in the Code. Injury Matters holds the stance that the changes, alongside the current gaps in the regulation of sports broadcasting, are inconsistent with the provisions outlined in the Broadcasting Services Act 1992. These adjustments fail to adequately protect public interests and could undermine the intended safeguards set by the Act.

Recommendation 4. Strengthen provisions relating to high-impact news material.

Recommendation 5. Mandate the inclusion of help-seeking information when broadcasting road crashes.

News broadcasts often feature content that can be deeply distressing and has the potential to traumatise or re-traumatise viewers. Injury Matters supports the proposal to enhance the provisions within the updated Code regarding warnings for such content. However, it is critical that effective enforcement mechanisms are put in place to ensure these safeguards are consistently upheld, thereby protecting the wellbeing of viewers.

The media's reporting of road traffic incidents plays a crucial role in shaping public perception of such events and influencing societal attitudes toward road safety. Given the emotive nature of media coverage, such reports can evoke strong personal reactions in audiences, particularly for those who may have experienced trauma from similar incidents. The cumulative impact of this trauma can significantly affect an individual's quality of life, relationships, social interactions, financial stability, and overall health. To better support viewers who may be impacted by such content, Injury Matters strongly advocates that all broadcasts of road traffic incidents be required to exclude graphic details and include appropriate help-seeking information. This approach should align with the standards set for the reporting of suicide or attempted suicide (Section 3.2.1.c).

Effective regulation of commercial free-to-air television is integral to the safety and wellbeing of all Australians. If you require any additional information I can be contacted via email at

[REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

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¹ AIHW (2024) *Alcohol, tobacco & other drugs in Australia* <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/impacts/health-impacts>

² 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

- ³ 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>
- ⁴ 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>
- ⁵ 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>
- ⁶ Jernigan D, Noel J, Landon J, et al (2017) *Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008* <https://onlinelibrary.wiley.com/doi/10.1111/add.13591>
- ⁷ Martino F, Ananthapavan J, Moodie M, et al (2022) *Potential financial impact on television networks of a ban on alcohol advertising during sports broadcasts in Australia*, <https://www.sciencedirect.com/science/article/pii/S1326020023002893>
- ⁸ ADF (2023) *Alcohol ads on social media target teens and young people* <https://adf.org.au/insights/alcohol-social-media-youth/>
- ⁹ 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>
- ¹⁰ Jones SC, Magee CA (2011) *Exposure to Alcohol Advertising and Alcohol Consumption among Australian Adolescents*. <https://pubmed.ncbi.nlm.nih.gov/21733835/>
- ¹¹ 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
- ¹² 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>
- ¹³ Forsdike K, O'Sullivan G, Hooker L (2022) *Major sports events and domestic violence: A systematic review*. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10087409/>
- ¹⁴ Food & Beverage (2024) *Most popular State of Origin drinks revealed* <https://www.foodmag.com.au/most-popular-state-of-origin-drinks-revealed/>