

I oppose the permissions for alcohol advertising and promotion in the current and draft free TV codes because as demonstrated by the convincing and compelling evidence below and attached to the covering email for this submission, alcohol advertising and promotion:

- causes children to use alcohol; and
- influences parents and peers of children to use alcohol or to have more positive attitudes towards alcohol, which in turn further influences children to use alcohol.

## EVIDENCE

# Chicritzhs et al, Adolescents' exposure to paid alcohol advertising on television and their alcohol use: exploring associations over a 13-year period

Aims: To determine i) whether Australian adolescents' exposure to television alcohol advertisements changed between 1999 and 2011 and ii) examine the association between television alcohol advertising and adolescent drinking behaviours

Conclusions: While Australian adolescents' exposure to alcohol advertising on television reduced between 1999 and 2011, higher levels of past-month television alcohol advertising were associated with an increased likelihood of adolescents drinking. The reduction in television alcohol advertising in Australia in the late 2000s may have played a part in reducing adolescent's drinking prevalence.

**Babor et al *Vulnerability to alcohol-related problems: a policy brief with implications for the regulation of alcohol marketing*, 2016 *Addiction*, vol 112.**

Young people and people with a history of alcohol dependence appear to be especially vulnerable to alcohol marketing, warranting the development of new content and exposure guidelines focused on protecting those groups to improve current self-regulation codes promoted by the alcohol industry. If adequate protections cannot be implemented through this mechanism, statutory regulations should be considered (page 94).

**Australian Medical Association, *Alcohol Marketing and Young People: Time for a New Policy Agenda***

The findings of research undertaken in both Australia and abroad show that attitudes and assumptions about drinking are not only shaped by the content of advertising, but also by the sheer volume and variety of marketing. Based on the weight of this evidence, several recent international, systematic reviews conclude that alcohol marketing increases the likelihood that adolescents will start to use alcohol, and will drink more if they are already using alcohol.

With convincing evidence supporting the link between alcohol marketing and alcohol consumption by young people, there is an urgent need to tackle the problem of alcohol marketing in Australia with robust policy and stronger regulatory oversight. While children and adolescents are particularly vulnerable to alcohol marketing, young people aged up to their mid-20s are highly susceptible and, as a prime target group for alcohol marketers, are at particular risk of alcohol-related harms. Stronger policy and regulation of alcohol marketing should encompass all these groups of young people.

Existing policy and regulatory responses in Australia have proven inadequate and have failed to keep up with the pace and scope of change in the media and marketing environment. The self-regulatory scheme for alcohol advertising in Australia is funded and administered by the alcohol industry. It is voluntary, limited in scope, unable to enforce penalties, and ultimately fails to protect young people from continuous exposure to alcohol marketing (Executive Summary).

**Australian National Preventive Health Agency *Alcohol Advertising: The Effectiveness of Current Regulatory Codes in Addressing Community Concern*, 2014**

It is clear from the evidence that the messages contained in alcohol advertising are reaching children and adolescents ... and that this advertising is having an influence on behaviour (page 38).

The international research is increasingly relevant for Australia given the globalisation of alcohol companies ... (page 38).

There is evidence that certain biological and psychosocial attributes make children and adolescents more vulnerable to advertising strategies than adults (page 39).

Free-to-air television is a far-reaching advertising medium for adolescents (page 40).

Alcohol advertising shapes cultural norms about alcohol, thereby influencing adolescents' beliefs about alcohol (page 44).

Both adolescents and adults are regularly exposed to advertisements that depict alcohol consumption as fun, social and inexpensive. Such messages are likely to reinforce existing alcohol-related cultural norms. For adolescents who have not started to drink, expectations

about drinking are influenced by normative assumptions as well as the observation of drinking by parents, peers and role models in the mass media (page 45).

Longitudinal and cross-sectional studies provide increasingly compelling evidence that exposure to alcohol advertising through traditional channels is associated with adolescents' drinking behaviour through early initiation of alcohol use as well as more frequent and heavy drinking (page 53).

See also chapter 3 generally (pages 38 – 56).

**Babor et al *The Relationship Between Exposure to Alcohol Marketing and Underage Drinking Is Causal*. Journal of Studies on Alcohol and Drugs, 2019.**

We judge as scientists that the evidence presented in this supplement is sufficient to conclude that alcohol consumption by youth is affected by exposure to alcohol marketing. In arriving at this conclusion, we have used the Bradford Hill criteria as a heuristic device for assessing causation in a broad epidemiological framework that draws evidence from many disciplines, many countries and many methods. Modest positive effects have been found in a range of countries, and plausible psychological, neurobiological, and other mechanisms have been identified as possible mediating factors, thus giving further support for a causal association (page 122).

**Jernigan, Petticrew, Babor et al *Normative value of 'best buys' and the case of bans on alcohol marketing* BMJ Global Health, 2024**

The body of research evidence provides a credible basis for the conclusion that reducing exposure to alcohol marketing will, over time, reduce the consumption of alcohol, and the normalisation of alcohol products and thereby reduce harm ... The breadth and depth of research showing the impacts of alcohol marketing strongly counter the misleading conclusion on the ineffectiveness of bans, which is based on systematic reviews of largely incomplete restrictions ... There is sufficient evidence to conclude marketing plays an important role in maintaining and growing alcohol markets, and a ban is a proportionate policy move (pages 2-3).

**Zerhouni et al *Drug and Alcohol Review 2019 How alcohol advertising and sponsorship works: Effects through indirect measures***

Our results converge with observational studies: there is indeed a positive and causal link between exposure to alcohol sponsorship and alcohol-related attitudes, which does not necessarily incur cognitive resources. What we showed is that alcohol sponsorship not only sends a message directly encouraging people to drink but tends to implicitly associate a product with a specific context and milieu (i.e. casual and desirable) in which alcohol is consumed (page 7).

**Winter et al *Exposure of children and adolescents to alcohol advertising on television in Australia*.**

This paper reports the extent to which children (0-12 years) and teenagers under the legal drinking age (13-17 years) were exposed to alcohol advertising on free-to-air television in Sydney, Australia during the period March 2005-February 2006 (page 2).

Children and underage teenagers are exposed to substantial levels of alcohol advertising on television in Australia, with a considerable body of research finding that such advertising directly influences their subsequent levels of alcohol consumption ... with the findings further suggesting that some alcohol marketers appear to be deliberately targeting underage 13 - 17 year old

teenagers through their television advertising ... there is an urgent need for government intervention to improve the efficacy of the regulatory framework for alcohol advertising in Australia. In particular, the cumulative figure is a neglected issue that needs to be discussed (page 15).

**Sandra Jones, *When does alcohol sponsorship of sport become sport sponsorship of alcohol? A case study of developments in sport in Australia*. International Journal of Sports Marketing and Sponsorship, April 2010.**

... politicians and the media appear complicit in further promoting the association between alcohol and sport and our children are floating in a sea of alcohol marketing. If we are to tackle ... alcohol-related harm in Australia, particularly among young people, we need to break the seemingly inexorable link between sports and alcohol ... (page 259).

**Lam, Chikritzhs et al Youth perceptions of alcohol advertising: are current advertising regulations working? Australian and New Zealand Journal of Public Health 2018 Vol 42 No 3**

This study shows that alcohol products are sometimes marketed in a way that directly appeals to adolescents ... The results of this study provide further impetus for a thorough review and revision of alcohol advertising codes and processes of adjudication, as has been recommended by experts and government bodies internationally. Current industry-regulated systems are not adequately protecting children and adolescents from exposure to or the influence of alcohol marketing. Advertisements strongly appealing to children or adolescents should be considered in breach of advertising codes, regardless of whether they also appeal to adults (page 238).

**Pediatrics Volume 131, 2013, *Exposure to Alcohol Advertisements and Teenage Alcohol-Related Problems*.**

Younger adolescents appear to be susceptible to the persuasive messages contained in alcohol commercials broadcast on TV, which sometimes results in a positive affective reaction to the ads. Alcohol ad exposure and the affective reaction to those ads influence some youth to drink more and experience drinking-related problems later in adolescence (page 369).

**Lam, Chikritzhs et al Australian Teenagers' Perceptions of Alcohol Advertising: Compliance With Regulatory Codes, National Drug Research Institute**

A range of typical print adverts across a range of alcohol types was shown to a sample of Australian teenagers. Young people showed a preference for the apple cider and the liqueur adverts, reporting that these adverts were appealing, and that the advert made them want to try and to purchase these products more often than for the other advertised products ... The liqueur and apple cider adverts contain features that have been shown to appeal to adolescents, including colour, humour and youthful characters. The advertised products themselves are sweetened alcoholic beverages that are popular with young people. The advertising techniques are effective in engaging with this group of alcohol-using teenagers, as seen by the high ratings of appeal and intentions to use ... some alcohol ads directly appeal to young people and impact on their intentions to try and to purchase advertised products. This study, together with previous research, demonstrates [that] ... Alcohol products are sometimes marketed in a way that, irrespective of intent, directly appeals to adolescents ... (page 4).

**Naimi et al *Amount of Televised Alcohol Advertising Exposure and the Quantity of Alcohol Consumed by Youth – Journal of Studies on Alcohol and Drugs.***

Our findings indicate that the amount of exposure to television alcohol advertising is associated with the quantity of alcohol consumed by underage youth, not just which brands they consume. In addition, there was a stronger association between advertising and consumption at higher levels of exposure (page 728).

**Boniface et al *Underage Adolescents' Reactions to Adverts for Beer and Spirit Brands and Associations with Higher Risk Drinking and Susceptibility to Drink: A Cross-Sectional Study in the UK, Alcohol and Alcoholism, 2022***

Using a large and nationally representative sample, this study found a substantial proportion of adolescents below the minimum legal purchasing age had positive reactions towards the alcohol adverts studied, and that positive reactions were associated with increased susceptibility to drink among never drinkers and higher risk drinking among current drinkers (page 354-355).

**Stacy et al *Exposure to Televised Alcohol Ads and Subsequent Adolescent Alcohol Use, American Journal of Health Behaviour, 2004***

Effects of advertising have implications for the prevention of alcohol use among adolescents. Although alcohol marketing efforts ostensibly target an adult audience, these findings indicate that young adolescents have numerous opportunities to view alcohol advertisements on television; and youth do notice and recall these advertisements. Furthermore, adolescents who are exposed to alcohol advertisements may have a higher risk of experimenting with alcohol in subsequent years. Although the magnitude of the association between alcohol-ad exposure and alcohol use varied according to the ad exposure measure used, the weight of the evidence from this study is consistent with that of some other studies suggesting that exposure to alcohol advertising increases the risk of subsequent alcohol use. Even if the risk attributable to advertising is small relative to other influences such as peers and social norms, limiting adolescents' exposure to pro-alcohol media messages could be an important part of a comprehensive strategy to prevent adolescent alcohol use. Given the potential public health benefits of reducing adolescent alcohol use, increased attention to this issue is warranted.

**Babor et al *Alcohol: No ordinary commodity***

The dangers in alcohol are multiple and varied in kind and degree; some, but not all, are dose-related; they may result directly from the effect of alcohol or through interaction with other factors; intoxication is often an important mediator of harm; and dependence can significantly exacerbate the hazards and cause protracted exposure to danger. Alcohol's harm to others extends the damage caused by alcohol significantly beyond the harm done to the individual drinker. For these reasons, alcohol is not an ordinary commodity, even when it is used in moderation, because the risk of acute and chronic effects begins at low doses of alcohol. Public health responses must be matched to this complex vision of alcohol's dual role as a commodity and as a drug. Population- level policies (universal interventions) should be considered, together with those directed at high-risk drinkers (selective interventions) and those targeting individuals who have already developed problems (targeted interventions) (page 23).

**The Story of the Iconic VB Big Cold Beer Ad, Brews News Australia, online.**

The VB campaign has run virtually unchanged since 1968. It is without doubt, the longest running beer campaign in Australia and possibly the world. The campaign is an advertising and cultural icon ... Victoria Bitter has grown to become the biggest selling beer in Australia and the most valuable brand in the country