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The George Institute for Global Health is pleased to contribute a written submission to the consultation on the Commercial Television Industry Code of Practice (the Code). We strongly oppose the proposed extension of time at which children can be exposed to alcohol advertising on television.

About The George Institute for Global Health

The George Institute for Global Health is a leading independent global health and medical research institute with major centres in Australia, India, and the UK. We are 1,000+ people globally, with more than 245 active projects across 50 countries. Our work uses innovative approaches to prevent and treat the leading causes of death in Australia and globally, including non-communicable diseases (e.g., heart disease, stroke, cancer, diabetes, and chronic lung disease) and injury. Our research has resulted in 10,000+ peer-reviewed publications and other academic outputs.

Our Alcohol Policy team works to reduce death and disease caused by alcohol. The team conducts multi-disciplinary research with a focus on generating outputs that will help government and health-related NGOs deliver a healthier environment for all. Our alcohol research covers the domains of alcohol marketing and supply, harm-reduction campaigns, and addressing industry's efforts to influence policy to the detriment of public health.

Acknowledgement of Country

The George Institute for Global Health acknowledges the traditional owners of the lands on which we work, and in particular the Gadigal people of the Eora Nation on which our Sydney office is situated. We pay our respects to Elders past, present, and future.

We value and respect the ongoing connection of Aboriginal and Torres Strait Islander peoples to Country and are committed to working in partnership with communities to deliver better health outcomes.



Issue overview

Alcohol use is one of the leading, but preventable, health risk factors. Alcohol consumption accounts for nearly 5% of the total disease burden in Australia (1) and causes 6,000 deaths per year (2). Alcohol is recognised as a group 1 carcinogen, and hence is not safe in any quantity (3). Australians remain heavy drinkers by world standards, consuming 9.5 litres of pure alcohol each per year (4).

The harms of alcohol use are not just restricted to individual and interpersonal harms, but also place a massive burden on our health and social services and economy. As the World Health Organization (WHO) notes in its Global Action Plan 2022-2030, 'The impact of harmful alcohol use on health is far-reaching and extends beyond those who drink, affecting others like victims of drink-driving and interpersonal violence, or children with foetal alcohol spectrum disorders' (5).

This is a substantial body of high-quality research demonstrating that exposure to alcohol advertising results in harmful outcomes for children. As outlined in our evidence synthesis (6), such exposure increases the risk of early alcohol initiation and greater participation in hazardous drinking among underage drinkers. The relationship between exposure and harm is dose-dependent, with cumulative exposure to alcohol advertising on television resulting in higher levels of youth alcohol consumption (7).

There are multiple mechanisms via which exposure to alcohol advertising increases underage alcohol consumption. The first is the 'mere exposure effect', which involves repeated exposure to advertising resulting in brand/product familiarity and increased preference for the advertised products (8). Second, the modelling of alcohol use through depictions in alcohol advertising can increase the perception that alcohol consumption is a common activity and socially acceptable (8,9). Third, by portraying alcohol consumption as enjoyable, alcohol advertising can create positive alcohol beliefs and expectancies that encourage early youth initiation (9).

Our evidence

Our work shows that 69% of Australians expect the government to limit the amount of alcohol advertising and 67% expect the government to ensure children are not exposed to alcohol advertising (10). These expectations are not being met, as demonstrated by our research showing that around half of television advertisements for alcohol appeared during children's popular viewing times (11). We have also shown that many alcohol advertisements breach the alcohol industry's own advertising code (ABAC) (12,13), as well as alcohol advertising standards in operation in other high-income countries (14). Especially problematic are alcohol advertisements aired during sporting programs, with our evidence synthesis highlighting the implicit associations



children make between alcohol and sport when exposed to this form of alcohol advertising (15).

Recommendations

Consistent with the large evidence base on harms resulting from exposure to alcohol advertising, especially among children, and our own extensive work demonstrating the prevalence and nature of alcohol advertising in Australia, The George Institute makes the following recommendations:

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 can be done by:
 - a. Retaining the current 'M' classification zone allowances in Section 2.2.2 of the Code that restricts alcohol advertising from being exposed to children during school holidays, public holidays and on weekends, or
 - b. Extending the current 'M' classification zone allowances for weekends and school holidays in Section 2.2.2, across all days, if the changes are intended to provide a uniform zone, or
 - c. De-coupling alcohol advertising in Section 6.2 from M classification zones, and separately defining times restricting alcohol advertising from being exposed to children during school holidays, public holidays and on weekends, if changes to M classification zones are needed.
2. Remove the exemption in Section 6.2 that allows alcohol advertising during sports broadcasts.
3. Remove the exemption in Section 8 of 'program sponsorship' from alcohol advertising, that allows the promotion of alcohol companies during program broadcasts.



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