

3 April 2015

Free TV Australia
44 Avenue Road
MOSMAN NSW 2088

By email: Code2015@freetv.com.au

To Whom It May Concern,

RE: Review of the Commercial Television Industry Code of Practice – Invitation for Public Comment

Thank you for the opportunity to provide a submission to the review of the Commercial Television Industry Code of Practice (the Code). We note that Free TV Australia is an industry body, and that authority in this area rests with the Australian Communications and Media Authority.

The Australian Health Promotion Association (AHPA) WA Branch wishes to raise concerns around components of the review; in particular, the impact this Code will have on increasing young people's exposure to alcohol promotion on television. Research from around the globe highlights the importance of restricting alcohol advertising during times and places whereby children and young people are exposed^{1 2 3 4 5 6 7 8}.

The detrimental impact of children's exposure to alcohol advertising is undeniable and we feel, as an industry body, you have an opportunity to change this Code for the betterment of children's health. The impact of alcohol advertising on unhealthy drinking patterns among young people is undeniable and coupled with increasing numbers of children viewing free-to-air sporting events; this is a serious issue needing attention from a wide variety of stakeholders. Free TV Australia should not become complacent about the impact of these promotions on the health of Australia's children and young people. In order to reduce children and young people's exposure to alcohol advertising on free-to-air commercial television, we recommend:

1. Alcohol advertisements are broadcast during late evening viewing times only.

The amended M classification zone in the proposed Code will potentially increase young people's exposure to alcohol advertising. As such, these promotions should not be tied to classification codes which are legally viewed by those under the age of 18 years.

Decisions about the broadcast of alcohol advertisements should be separate to decisions about bringing the M classification zone earlier to 7.30pm. Watershed times should be determined on the basis of the relevant evidence about young people's viewing patterns with the aim of minimising their exposure.

2. Removing the provision that allows alcohol advertisements to be broadcast during televised sporting events on weekends and public holidays.

Free TV Australia assert that children constitute a very small percentage of the audience for sporting events. However, the evidence contradicts this^{9 10}. Alcohol advertisements should not be broadcast during any sporting event. There are well-publicised concerns about linking alcohol and sport, and research has shown that sports programs are popular among children and young people^{9 10}. The watershed should apply to all days and programs with no exclusions.

3. Removing the exclusions under the definition of ‘Commercial for alcoholic drinks’ which may allow alcohol promotions outside the watershed times.

All alcohol brand promotion should be covered by the Code and tightly restricted, including the marketing of alcohol products, licensed premises, and alcohol sponsorship of sport and events.

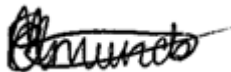
We also have concerns about the approach of the proposed Code. The well-being of children and young people should come before the commercial interests of television stations and advertisers. Development of the Free TV Australia Code should be an independent process to ensure community and public interest is a primary objective.

Decisions about if and when alcohol advertisements can be broadcast should be based on the evidence about the impact of alcohol advertisements on young people and independent analysis of data on young people’s TV viewing patterns. Comprehensive regulation of alcohol marketing across all platforms is required in order to reduce children and young people’s exposure.

We urge Free TV Australia to use this review to support action that will reduce young people’s exposure to alcohol advertising on commercial television, and to reject any suggestions that this exposure be increased.

Please do not hesitate to contact me anytime on adminwa@healthpromotion.org.au.

Kind regards,



Melinda Edmunds
President
Australian Health Promotion Association (WA Branch)

¹ Anderson P, De Bruijn A, Angus K, Gordon R and Hastings G. 2009. Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol and Alcoholism* 44:229-43.

² Roche AM, Bywood PT, Borlagdan J, Lunnay B, Freeman T, Lawton L, et al. 2007. Young people and alcohol: the role of cultural influences. Adelaide: National Centre for Education and Training on Addiction.

³ Anderson P and Baumberg B. Alcohol in Europe: a public health perspective. 2006. A report for the European Commission. Institute of Alcohol Studies, UK.

⁴ WHO Expert Committee on Problems Related to Alcohol Consumption. 2007. WHO Expert Committee on Problems Related to Alcohol Consumption. Second report. World Health Organization.

⁵ Meier P, Booth A, Stockwell A, Sutton A, Wilkinson A, Wong R, et al. 2008. Independent Review of the Effects of Alcohol Pricing and promotion. Part A: Systematic Reviews. The University of Sheffield.

⁶ Hastings G, Anderson S, Cooke E and Gordon R. 2005. Alcohol marketing and young people's drinking: a review of the research. *Journal of Public Health Policy* 26(3):296-311.

⁷ Snyder LB, Milici FF, Slater M, Sun H and Strizhakova Y. 2006. Effects of alcohol advertising exposure on drinking among youth. *Arch Pediatr Adolesc Med* 160(1):18-24.

⁸ Smith LA and Foxcroft DR. 2009. The effect of alcohol advertising, marketing and portrayal on drinking behaviour in young people: systematic review of prospective cohort studies. *BMC Public Health* 9:51.

⁹ Australian Communications and Media Authority. 2007. Children’s viewing patterns on commercial, free-to-air and subscription television; Report analysing audience and ratings data for 2001, 2005, and 2006. Canberra: ACMA.

¹⁰ Australian National Preventive Health Agency. 2014. Alcohol advertising: the effectiveness of current regulatory codes in addressing community concern draft report. Canberra: ANPHA.