

WA Alcohol and Youth Action Coalition Position Statement

ALCOHOL PROMOTION

Last updated: 14 January 2013

General notes

- Reducing the exposure of young people to alcohol promotion is an important component of a comprehensive strategy to prevent harm from alcohol among young people.
- The Coalition will focus on population-level prevention strategies and also supports appropriate treatment and services as part of a comprehensive approach.
- Alcohol use by young people must be seen within the context of the Australian drinking culture and measures required to reduce broader harms.

Key messages and recommendations

These recommendations are consistent with those of the National Preventative Health Taskforce,¹ the World Health Organization² and the Australian Medical Association.³

Exposure of young people to alcohol promotion

Alcohol promotions should be phased out from times and placements which have high exposure to young people aged up to 25 years.

Products that appeal to young people

Action should be taken to phase out and prevent the introduction of new alcohol products that would be expected to appeal to young people.

Alcohol sponsorship

Alternative funding should be made available to replace alcohol sponsorship of sport, music and cultural events which appeal to young people aged up to 25.

Regulation of alcohol advertising and promotion

Strong, independent, legislated controls on all forms of alcohol promotion should be introduced to ensure it is socially responsible and exposure to young people is minimised.

Background

Exposure of young people to alcohol promotion

Alcohol companies and retailers spend hundreds of millions of dollars each year promoting their products, and their advertising is highly effective. Alcohol is one of the most heavily marketed products in the world.⁴

Young people are exposed to alcohol promotion in a wide range of forms including television, radio, online (including social media, YouTube, mobile phones and websites), sponsorship (including sport and music events), print (including magazines and newspapers), outdoor (including billboards, bus shelters and on public transport) and product placement (including in music videos).

Research has shown that Australian children and teenagers below the legal drinking age are exposed to unacceptably high levels of alcohol advertising, including on television.⁵ A 2010 review of alcohol advertisements on Australian television found that around half of all alcohol advertisements appeared during children's popular viewing times.⁶ There are concerns that many alcohol promotions to which young people are exposed contain features that would be expected to appeal to young people.^{7, 8}

There is growing concern regarding the promotion of alcohol using social media and digital technologies due to the rapid expansion of digital communication and the extent to which young people have taken up such forms of communication.⁹ The growth of new media has enabled the development of new marketing tools and techniques, including increasingly interactive, personalised and ubiquitous marketing in an environment that is subject to limited regulation.⁹ Online and digital forms of marketing, including through social media, have become a favoured approach of alcohol companies around the world.¹⁰⁻¹² Young people's unfettered access to global alcohol promotions through the internet requires an urgent global policy response,¹¹ to which Australia is urged to contribute.

The effects of alcohol promotion on young people are now widely acknowledged. Exposure to alcohol advertising influences young people's beliefs and attitudes about drinking, and increases the likelihood that adolescents will start to use alcohol and will drink more if they are already using alcohol.¹³ Research evidence consistently shows strong associations between exposure to alcohol advertising and young people's early initiation to alcohol use and/or increased alcohol consumption.^{14, 15} Alcohol promotion contributes to the normalisation of alcohol use⁹ and reinforces the harmful drinking culture that exists in Australia.

The Coalition supports the recommendation of the National Preventative Health Taskforce¹:

In a staged approach, phase out alcohol promotions from times and placements which have high exposure to young people aged up to 25 years, including:

- Advertising during live sport broadcasts
- Advertising during high adolescent/child viewing
- Sponsorship of sport and cultural events

The Commercial Television Industry Code of Practice does not allow direct advertisements for alcoholic drinks to be broadcast during children's viewing hours, except during live broadcasts of sporting events on weekends and public holidays.¹⁶ This restriction does not apply to "a program sponsorship announcement on behalf of a brewing company or other liquor industry company". Children and young people are likely to make up a significant proportion of the audience of sporting broadcasts, particularly on weekends and public holidays. This exception should be removed as part of a comprehensive strategy to reduce young peoples' exposure to alcohol promotion.

Products that appeal to young people

A wide range of alcohol products are likely to appeal to young people. These products are often:

- Very sweet;
- Fruit-flavoured;
- Colourful (in terms of packaging and/or the drink itself or feature designs, characters or other devices that predominantly appeal to young people); or are
- Packaged in containers which facilitate rapid consumption or the consumption of large quantities (e.g. shots or casks).

Taste testing studies where young people (both under and over 18 years) are asked to indicate whether a range of de-identified commercial pre-mixed or 'ready-to-drink' products contain alcohol and their taste preferences have found that young drinkers often have difficulty correctly identifying whether 'ready-to-drink' products contain alcohol.^{17, 18} In these studies, difficulties identifying alcohol have been particularly apparent in regard to alcoholic products that look and taste like a chocolate milkshake, or other milk-based products, and these products are often considered to be highly attractive to young drinkers.

A significant body of literature supports the conclusion that the use of sweet flavours reduces the natural resistance many young and inexperienced drinkers have to the strong and potentially unpleasant taste of alcohol.¹⁷

Concerns have been raised regarding alcoholic energy drinks. In addition to the established practice of mixing energy drinks with alcohol for on-premise consumption, packaged alcoholic energy drinks are widely available. Concerns relate to the potential for^{19, 20}:

- Increased alcohol consumption – energy drinks can mask the feeling of intoxication, encouraging people to drink more than they otherwise would;
- Increased potential for injury and risk-taking behaviours – impaired judgement associated with intoxication at the same time as increased alertness can increase the potential for risk-taking behaviours such as violence and drink-driving;
- Physiological effects of dehydration (both alcohol and caffeine have diuretic effects) and of combining a stimulant (caffeine) and a depressant (alcohol), such as increased heart rate or palpitations.

It would be difficult to argue that young people are adequately informed about the potential harms from consuming significant quantities of energy drinks either alone or in combination with alcohol.

In addition to advertising by alcohol companies, recent years have seen an increase in advertising by retail outlets, often with promotions that may be especially attractive to young people.

Alcohol sponsorship

Sponsorship is seen as an important strategy by alcohol companies to build brand awareness and credibility, attract new recruits to a product, and capitalise on an expected transfer of favourable emotions and images which consumers have of an event to the sponsoring brand.²¹

The industry self-regulatory advertising codes do not cover sponsorship,²² which is a favoured form of marketing for alcohol companies.

Alcohol sponsorship of sporting and cultural organisations and events is a key method through which young people are exposed to significant amounts of alcohol promotion. In return for sponsorship funding from the alcohol industry, recipients prominently display alcohol branding on many surfaces.²³ This may include prominent branding of promotional materials (in print, television, radio and online forms), uniforms, merchandise, boundary fences, billboards, scoreboards and television broadcasts.

For example, an analysis of the telecast of the XXXX™ GOLD Beach Cricket Tri-nations 2008 identified that the XXXX™ logo was clearly visible during 74% of the game time, with uninterrupted screening of the logo lasting up to 71 seconds. The logo was visible on a large range of surfaces including on players uniforms, stumps, players' cricket bats, telecast graphics, fence signage, promotional hats worn by spectators and on the scoreboard.²⁴ Removing avenues for alcohol branding is a necessary step towards reducing young people's exposure to alcohol promotion.

There is also heavy advertising for alcohol products and retailers during sporting events that are likely to appeal to children and young people, as well as directly at events attended by children.

Alcohol sponsorship of sport sends conflicting messages to the community. The public, including young people, could reasonably assume that by accepting sponsorship from alcohol companies, sporting and other organisations are providing their endorsement to the products. Sporting organisations' close ties with the alcohol industry mean that groups who would be expected to be natural allies of the health field often support alcohol industry positions.

Many sports popular among Western Australians of all ages are associated with alcohol. In June 2012, the AFL announced a 10 year sponsorship agreement with Carlton United Breweries (CUB) which will see continued promotion of Carlton Draught through AFL.²⁵ Carlton Draught sponsorship further extends to the WA Football League (WAFL) and the WA Amateur Football League. Rugby WA and the Western Force are sponsored by Hahn Super Dry (Lion), and the WA Cricket Association is sponsored by Hahn Super Dry (Lion), Jacob's Creek (Pernod Ricard) and Johnnie Walker (Diageo). Despite the obvious inappropriateness, motor sport is strongly affiliated with alcohol sponsors; Coopers Brewery and Jim Beam (Beam Global) sponsor the V8 Supercars Championship Series; and Jim Beam, Jack Daniel's (Brown Forman) and The Bottle-o liquor stores sponsor V8 Supercar teams. Equally inappropriate is alcohol sponsorship of water sports, yet VB (CUB) sponsor Surfing Australia and Jim Beam sponsor surfing competitions.¹

There is community support for removing alcohol advertising and sponsorship during sport. An independent survey of 1600 West Australian adults conducted by the Painted Dog Research company in April 2012 (commissioned by the McCusker Centre for Action on Alcohol and Youth) showed: only 17% of Western Australians oppose the phasing out of alcohol sponsorship of sporting events if governments provided replacement funding (21% neutral).

Music festivals, popular with young people, are a key marketing ground for alcohol companies in Australia and internationally.²⁶⁻²⁸ Internal marketing documents from the UK outline efforts to align particular alcohol brands with music festivals in order to reach young people.²¹

There is a need for alternative sources of funding to replace and prevent the acceptance of alcohol industry support by sports, music and other event organisers. Agencies that have an existing role in providing alternative funding sources should be adequately funded, including Healthway, the WA Health Promotion Foundation, and the Australian National Preventive Health Agency (ANPHA).

Regulation of alcohol advertising and promotion

In Australia, alcohol advertising is subject only to voluntary regulation administered by the alcohol and advertising industries through the Advertising Standards Bureau (ASB) and the Alcohol Beverages Advertising Code (ABAC). Self-regulation of alcohol advertising has consistently failed to protect young people from exposure to alcohol promotion.⁹

¹ The sponsorship arrangements noted in this paragraph are current as at 9 January 2013.

Weaknesses of the current self-regulatory system include:

- The system does not cover all alcohol advertisers; non-signatories to the voluntary system go unregulated;
- The Codes are weak and only relate to a narrow definition of alcohol advertising; the regulation does not extend to other forms of alcohol marketing such as sponsorship, product placement or gift-with-purchase promotions;
- Regulation of new media and advertising placement is piecemeal and weak;
- Processes for reviewing complaints are protracted; determinations often come after the advertisement has finished its run;
- The ASB and ABAC have no power to enforce their decisions;
- There are no systems in place to penalise advertisers who breach the voluntary regulations.

Gift-with-purchase promotions are a popular marketing strategy used by alcohol advertisers. The gifts offered upon purchase of a particular product may hold strong appeal with young people, for example, lip gloss, nail polish or branded merchandise (e.g. beach balls, hats, clothing). There are currently no provisions within the alcohol and advertising industries self-regulatory advertising codes which regulate gift-with-purchase promotions.²⁹

Product placement is a recognised promotional activity intended to increase consumers' exposures to brands through strategic placement in television shows, movies, music videos and other media.³⁰ Analyses of music videos broadcast on Australian television on Saturday mornings found around one-third of music videos contained drug references, and alcohol featured in almost all of these.³⁰ A complaint to the self-regulatory ABAC scheme regarding alleged product placement of the liqueur Midori in the music video 'You Make Me Feel' by Cobra Starship was dismissed, as product placement was not considered to be within the scope of the ABAC scheme.³¹

Alcohol and advertising industry involvement in self-regulating their advertising is seen as both biased and ineffective.³²

The Alcohol Advertising Review Board (AARB) was established in March 2012 by the McCusker Centre for Action on Alcohol and Youth and Cancer Council WA in response to the failure of the self-regulatory system to ensure that alcohol is promoted responsibly and that young people's exposure to alcohol advertising is minimised.³³ The mission of the AARB is to administer an independent alcohol advertising complaint review service to help protect the community from inappropriate alcohol advertising and encourage effective regulation of alcohol advertising.

The AARB Code covers all forms of alcohol advertising in Australia in terms of both content and placement, and sets criteria for acceptable alcohol advertising. Irresponsible alcohol advertisers are publicly named and shamed.

Strong community support exists for independent regulation of alcohol advertising. An independent survey of 1450 West Australian adults conducted by the Painted Dog Research company in November 2012 (commissioned by the McCusker Centre for Action on Alcohol and Youth) showed: 71% of Western Australians support legal controls to reduce young people's exposure to alcohol advertising (with only 6% opposed).

The Position of the WA Alcohol and Youth Action Coalition

State:

- Alcohol promotions should be phased out from times and placements which have high exposure to young people aged up to 25 years.
- Adequate, sustainable funding should be made available to replace alcohol sponsorship of sport, music and other events and activities to which young people are exposed.
- Introduce a policy to phase out alcohol promotion on all locations under the jurisdiction of the WA Government, including public transport and bus shelters.
- The *Liquor Control Act 1988* should be amended to enable the removal of existing alcoholic products expected to appeal to young people on the basis of a reasonable level of evidence, and prevent the introduction of new alcoholic products that would be expected to appeal to young people.

National:

- Alcohol promotions should be phased out from times and placements which have high exposure to young people aged up to 25 years.
- Introduce strong, independent, legislated controls on all forms of alcohol promotion to ensure it is socially responsible and exposure to young people is minimised.
- Adequate, sustainable funding should be made available to replace alcohol sponsorship of sport, music and other events and activities to which young people are exposed.
- Amend the Commercial Television Industry Code of Practice to prohibit alcohol promotion during live sports broadcasts.
- Investigate further means of curbing young peoples' exposure to alcohol promotion via the internet and social media.

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