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Copy to: Australian Communications and Media Authority (ACMA)

2 April 2015

Dear Ms Flynn,

Submission on the Proposed Commercial Television Industry Code of Practice 2015

Cancer Council WA and the McCusker Centre for Action on Alcohol and Youth (McCusker Centre) welcome the opportunity to make a submission to Free TV Australia regarding the proposed Commercial Television Industry Code of Practice (the Code). For the reasons set out in this submission, we do not support the proposed Code as it fails to minimise children and adolescents' exposure to alcohol advertising on free-to-air television. We will also be sending our submission to the Australian Communications and Media Authority (ACMA).

Cancer Council WA is a not-for-profit, incorporated association and has been the leading non-government cancer agency in Western Australia since 1958. Cancer Council Western Australia is committed to working towards a cancer free future for our community.

The McCusker Centre is an independent organisation committed to reducing harms from alcohol among young people. The work of the McCusker Centre is directed towards raising awareness of the magnitude of alcohol-related harms among young people, the approaches we know can work, other options and the need to act without delay.

What is the level of alcohol related harms among Australian children and adolescents?

There is significant concern among the Australian community about drinking patterns among young people and the resulting harms. Over three-quarters of Australians believe that Australia has a problem with excess drinking or alcohol abuse.¹ Independent market research shows that 94% of Australian adults are concerned about alcohol use among young people and 94% are concerned about alcohol-related violence.²

¹ Foundation for Alcohol Research & Education (FARE). Annual Alcohol Poll: Attitudes and Behaviours. 2014. Available at: http://www.fare.org.au/wp-content/uploads/2011/07/FARE-Alcohol-Poll-2014_LR.pdf

² AMR National Omnibus. Commissioned by McCusker Centre for Action on Alcohol and Youth. 13 June 2013. Available at: http://mcaay.org.au/assets/publications/market-research-reports/amr-omnibus_6qs_17062013_smaller-file.pdf

The drinking patterns of young people in Western Australia are particularly concerning. While fewer WA young people are using alcohol, those who do drink are drinking more. According to the 2011 Australian School Student Alcohol and Drug Survey,³ of those WA students aged 12-17 years who drank in the last week, more than one-third (36.2%) drank at risky levels for single occasion alcohol-related harm. Many of these young people also report concerning attitudes towards alcohol; 39.3% of WA 12-17yr old students report that, “one of the main reasons I drink is to get drunk”.

These drinking patterns are associated with high levels of short term and long term alcohol related harms in young people. Younger, risky drinkers are most likely to report a loss of memory, with over a third (37.7%) of those aged 12 to 17 years reporting memory loss as a result of alcohol consumption at least once a month.⁴ Almost half of all WA school students aged 16 to 17 who report drinking in the previous week also report being sick or vomiting after drinking.⁵

In addition to the short term risks associated with excessive alcohol consumption, there is growing evidence that alcohol is implicated in a range of longer term consequences including harm to brain development. The brain continues to develop into the early twenties, and alcohol can irreparably damage young brains leading to problems with memory, planning and organisation, impulse control and mood regulation.⁶

Does alcohol increase the risk of some cancers?

There is a scientific consensus that the long-term, chronic use of alcohol can cause cancer; this fact has been known for two decades. In 1988, the world-leading cancer agency – the International Agency for Research on Cancer (IARC) – classified alcoholic drinks and the chemical present in these drinks (ethanol) as Group 1 carcinogens, which is the same classification as tobacco and asbestos.⁷

Cancer Council WA estimates that between 2,182 and 6,620 new cases of cancer (or 1.9-5.8% of all cancers) in Australia each year are attributable to the long term, chronic use of alcohol.⁸ There is convincing evidence that alcohol use increases the risk of cancers of the mouth, pharynx, larynx, oesophagus, bowel (in men) and breast (in women).⁹ There is probable evidence that it increases the risk of bowel cancer in women and liver cancer. Studies show that the risk of cancer increases with increasing consumption of alcohol on a

³ Bridle R, Miller J, King T, Christou A. Australian School Student Alcohol and Drug Survey: Alcohol Report 2011 – Western Australian results. Drug and Alcohol Office Surveillance Report: Number 8. Perth: Drug and Alcohol Office; 2012.

⁴ Australian Institute of Health and Welfare. 2010 National Drug Strategy Household Survey report. Drug statistics series no. 25. Cat. no. PHE 145. Canberra: AIHW; 2011.

⁵ Bridle R, Miller J, King T, Christou A. Australian School Student Alcohol and Drug Survey: Alcohol Report 2011 – Western Australian results. Drug and Alcohol Office Surveillance Report: Number 8. Perth: Drug and Alcohol Office; 2012.

⁶ Bava S, Tapert SF. Adolescent brain development and the risk for alcohol and other drug problems. *Neuropsychological Review*. 2010; 20(4):398-413.

⁷ World Health Organization, International Agency for Research on Cancer. IARC Monographs on the evaluation of carcinogenic risks to humans. Volume 44. Alcohol drinking. Summary of data reported and evaluation. Lyon, France: IARC; 1988 Available from: <http://monographs.iarc.fr/ENG/Monographs/vol44/volume44.pdf>

⁸ Cancer Council Australia. 2014. Position Statement on Alcohol and Cancer Prevention. Available at: http://wiki.cancer.org.au/prevention/Position_statement_-_Alcohol_and_cancer#table_1

⁹ World Cancer Research Fund, American Institute for Cancer Research. Food, nutrition, physical activity, and the prevention of cancer: a global perspective. Washington DC: AICR; 2007

regular basis.¹⁰ Alcohol may also contribute to weight gain, which increases the risk of a number of cancers.

Australia has a relatively high burden of alcohol-related cancer due to high levels of alcohol consumption. Cancer Council WA recommends that to reduce cancer risk, people should limit how much they drink or better still, avoid drinking alcohol altogether. For those who choose to drink alcohol, Cancer Council WA recommends drinking within the National Health and Medical Research Council (NHMRC) Guidelines.¹¹

Key themes in our submission include:

- Cancer Council WA and McCusker Centre do not support the proposed Code. If the proposed Code is adopted, it is likely to increase children's and adolescents' exposure to alcohol advertisements.
- Changes to the Code must focus on reducing, not increasing, young people's exposure to alcohol advertising. The well-being of children and young people should come before the commercial interests of television stations and advertisers. The proposed Code prioritises commercial interests.
- Leading health authorities, including the World Health Organization and the Australian Medical Association, recommend restricting alcohol advertising during times and in places which have high exposure to children and young people.
- Comprehensive regulation of alcohol marketing across all platforms is required in order to reduce young people's exposure to alcohol promotion, and adequate regulation of advertising on TV must be a part of that.
- Children and adolescents in Australia are already heavily exposed to alcohol advertising on free-to-air television; around half of such advertisements appear during children's popular viewing times.
- Free TV Australia should adopt an evidence-based approach to the regulation of alcohol advertising on television that prioritises the health and wellbeing of the community and of children and young people in particular. Decisions about if and when alcohol advertisements may 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.
- Permitting alcohol advertisements to be aired from an earlier time would significantly increase children's and adolescents' exposure to alcohol promotions and would be an unacceptable step backwards.
- The proposed Code fails to close the loophole that allows alcohol advertisements to be aired on weekends and public holidays during live sporting events; rather the proposed Code would extend this loophole to all sports broadcasts on weekends and public holidays.
- Loopholes in the Code that allow alcohol ads to be shown outside watershed times must be closed.

¹⁰ Corrao G, Bagnardi V, Zambon A, La Vecchia C. A meta-analysis of alcohol consumption and the risk of 15 diseases. *Preventive Medicine*. 2004 May;38(5):613-9

¹¹ National Health and Medical Research Council (NHMRC) Australian Guidelines to Reduce Health Risks from Drinking Alcohol, 2009. Available at: <https://www.nhmrc.gov.au/files/nhmrc/publications/attachments/ds10-alcohol.pdf>. Men and women are advised to drink no more than two standard drinks on any day. To reduce the risk of alcohol-related injury, men and women should drink no more than four standard drinks on a single occasion.

Recommendations

1. Decisions about if and when alcohol advertisements can be broadcast should be based on the evidence about the impact of alcohol ads on young people and young people's TV viewing patterns.
2. Free TV Australia should make available for independent analysis data on the viewing patterns of children and young people up to 25 years.
3. Alcohol advertisements should only be broadcast outside of children's and adolescents' popular television viewing times and should be considered separately from the M classification.
4. In order to reduce exposure among children's and adolescents, a watershed time for alcohol advertisements should be much later than the proposed 7.30pm or the current time of 8.30pm. A more appropriate time that would minimise children's and young people's exposure to alcohol advertisements would be 10.30pm. This recommendation is supported by OzTam data outlining children's and young people's viewing patterns.
5. The exemption relating to alcohol advertising during sports broadcasts should be removed from the proposed Code. Removing this loophole should be supported by the removal of all alcohol promotion from sport including alcohol sponsorship of sporting events and teams.
6. Free TV Australia should make available for independent analysis data on audiences for weekend televised sports, including ratings data for children and young people up to 25 years.
7. The exemptions to the definition of 'commercial for alcoholic drinks' should be removed and the definition should be amended so that it applies to all direct or indirect alcohol promotions.
8. Community and public interest should be the primary objective of the review of the Code, with particular focus on the impact on children and adolescents.
9. The controls on alcohol advertising and promotion within the Code should be strengthened, not weakened. Comprehensive regulation of alcohol marketing across all platforms is required in order to reduce young people's exposure to alcohol promotion, and adequate regulation of advertising on TV must be a part of that.
10. All submissions to Free TV Australia in the Code review process should be made publicly available online.

Introduction

Alcohol is no ordinary commodity; it contributes to substantial short and long term harms in the Australian community and is not lawfully available for purchase by those aged under 18. However, alcohol is one of the most heavily promoted products in the world.¹²

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).

The World Health Organization,¹³ the Australian Medical Association,¹⁴ the National Preventative Health Taskforce,¹⁵ and other groups recommend restricting alcohol advertising

¹² Jernigan DH. The extent of global alcohol marketing and its impact on youth. *Contemporary Drug Problems*. 2010; 37:57.

¹³ World Health Organization (WHO). Global Strategy to Reduce the Harmful Use of Alcohol. 2010. Available at: http://www.who.int/substance_abuse/alcstratenglishfinal.pdf?ua=1

during times and in places which have high exposure to children and young people as part of a comprehensive approach to reducing alcohol related harms. These recommendations include phasing out alcohol sponsorship of sport and removing alcohol advertising during sports broadcasts.

Studies show that Australian children and adolescents are highly exposed to alcohol advertising on free-to-air television, with around half of such advertisements appearing during their popular viewing times.¹⁶ The World Health Organization notes in the *Global strategy to reduce the harmful use of alcohol*, “It is very difficult to target young adult consumers without exposing cohorts of adolescents under the legal age to the same marketing”.¹⁷

Free-to-air television contributes significantly to young people’s exposure to alcohol advertising, and alcohol advertisements and promotions should therefore be broadcast outside of their popular viewing times. Ratings analyses consistently show that these audiences are highest between 6pm and 9pm, with tens of thousands of children still watching even at 10:30pm [Appendix 1]. Permitting these advertisements to be shown from 7:30pm would greatly increase their familiarity with underage audiences. There is a strong argument in favour of only airing such advertisements from a much later time, such as 10:30pm. This later time is supported by OzTam data reflecting children and young people’s viewing behaviours [Appendix 1].

There is a growing body of evidence that alcohol advertising influences young people’s beliefs and attitudes about drinking alcohol and their drinking patterns.¹⁸ A systematic review of high quality longitudinal studies showed that advertising influences the alcohol-related attitudes and behaviours of young people.¹⁹ The review included thirteen studies that assessed underage individuals’ exposure to alcohol advertising and alcohol drinking behaviour at follow up. The authors concluded that alcohol advertising and promotion increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol. This was based on the strength of the association and consistency of findings across observational studies.

It is disappointing that Free TV Australia has not taken the opportunity to seek an end to the broadcast of alcohol advertisements on weekends and public holidays during televised sporting events. The current exemption maintains the association between sport and alcohol, which is known to influence young people.²⁰ The proposed Code widens this

¹⁴ Australian Medical Association. Alcohol Marketing and Young People: Time for a new policy agenda. Canberra: AMA; 2012

¹⁵ National Preventative Health Taskforce. Australia: the healthiest country by 2020. Technical Report No 3. Preventing alcohol-related harm in Australia: a window of opportunity. 2009. Available at: [http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/\\$File/alcohol-jul09.pdf](http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/$File/alcohol-jul09.pdf)

¹⁶ Pettigrew S, Roberts M, Pescud M, Chapman K, Quester P & Miller C. The extent and nature of alcohol advertising on Australian television. *Drug and Alcohol Review*. 2012;31:797-802.

¹⁷ World Health Organization (WHO). Global Strategy to Reduce the Harmful Use of Alcohol. 2010. Available at: http://www.who.int/substance_abuse/alcstratenglishfinal.pdf?ua=1

¹⁸ Babor T et al. Alcohol: no ordinary commodity. Oxford: Oxford University Press; 2010.

¹⁹ Anderson P, Bruijn A, Angus K, Gordon R & Hastings G. Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies. *Alcohol & Alcoholism*. 2009;44(3):229-243. See also: Jones S & Magee C. Exposure to Alcohol Advertising and Alcohol Consumption among Australian Adolescents. *Alcohol & Alcoholism*. 2011;46(5):630-637.

²⁰ Jones S, Phillipson L & Barrie L. ‘Most men drink...especially like when they play sports’ – alcohol advertising during sporting broadcasts and the potential impact on child audiences. *Journal of Public Affairs*. 2009;10:59-73.

loophole by applying it to all 'sports broadcasts,' rather than 'live sporting events' as defined in the Code.

Cancer Council WA and McCusker Centre are also concerned that the definition of 'commercial for alcoholic drinks' used in the proposed Code contains a number of exemptions that weaken its application. Effective regulation of alcohol advertising on television would encompass all forms of alcohol promotions and advertising.

Comprehensive regulation of alcohol marketing must cover alcohol advertising and promotion on television. As exposure to alcohol advertising has been shown to influence underage drinking patterns,²¹ Cancer Council WA and McCusker Centre support the comprehensive regulation of alcohol marketing across all media platforms. A lack of regulation in other platforms does not justify a weakening of Free TV's Code of Practice. Strong, independent, legislated controls on all forms of alcohol advertising and promotion should be introduced to ensure that it is socially responsible and that exposure to young people is minimised. Such a system would include comprehensive codes and enforceable decisions with sanctions that genuinely act as a deterrent. Self-regulation has consistently been found to be ineffective.²²

It is our view that the proposed Code appears to prioritise the commercial interests of the industry represented by Free TV Australia over the health and well-being of young people. There has been little attempt to minimise young people's exposure to alcohol advertising; indeed most of the proposed changes would have the opposite effect. Cancer Council WA and McCusker Centre submit that Free TV Australia should adopt an evidence-based approach to the regulation of alcohol advertising on television. There appears to have been limited public consultation prior to the release of the Code, even though it purports to uphold community standards. We would urge Free TV Australia to give due weight to community concerns about alcohol advertising when amending the proposed Code.

Proposal to permit alcohol advertisements to be broadcast from 7:30pm

The proposed Code permits commercials for alcoholic drinks to be broadcast during an M classification zone, which is defined by clause 2.2.2 as:

- | | |
|-----------------------------------|---------------------------------------|
| (a) Schools days | 7:30pm to 6:00am
12 noon to 3:00pm |
| (b) Weekends and Schools Holidays | 7:30pm to 6:00am |
| (c) Public Holidays | 7:30pm to 6:00am |

This change would allow commercials for alcoholic products to be broadcast one hour earlier in the evening than is permitted under the current Code. Cancer Council WA and McCusker Centre oppose this change as the evidence presented below indicates that it will likely increase children and adolescents' exposure to alcohol advertisements and influence their behaviour in relation to alcohol.

²¹ See above, n 12, 19.

²² Moodie R, Stuckler D, Monteiro C et al. Profits and pandemics: prevention of harmful effects of tobacco, alcohol, and ultra-processed food and drink. *The Lancet*. 2013; 381(9867):670-679.

To what extent are Australian children and adolescents currently exposed to alcohol advertising on free to air television?

Studies have shown that children and adolescents in Australia are exposed to high levels of alcohol advertising on free-to-air television. Ninety-four percent of Australian students aged 12 to 17 years report having seen alcohol advertising on television.²³

A 2009 study in the five mainland capital city markets found that children aged 12 and under were exposed to almost one-third of the exposure level of adults.²⁴ Adolescents aged between 13 and 17 years were exposed to almost the same levels as young adults aged between 18 and 24 years. Differences were observed between cities, with a particularly high level of exposure among children in Adelaide and adolescents in Melbourne. The authors also observed that the advertisements with the highest exposure to children and adolescents all contained at least one element known to appeal to these groups. The study was conducted over a two month period across Australia's five major cities.

A more recent study of alcohol advertising on Australian free-to-air television found that around half of alcohol advertisements appeared during children's popular viewing times.²⁵ These were defined as times during which the percentage of children viewing television was greater than 25% of the total possible child audience. Spending on alcohol advertising in major Australian cities during the two month period of the study was \$15.8 million. An analysis of the content of these advertisements found that depictions of animals, physical activity, humour and friendship/mateship were common, which may socialise young people to view alcohol as a fun and social product.

What are the television viewing habits of Australian children and adolescents?

Ratings data collected by OzTam were accessed via Aquest eTam. OzTam is the official source of television audience measurement (TAM) covering Australia's five mainland metropolitan markets and nationally for subscription television.²⁶ The data is independent and industry standard.

OzTam data for the five Australian capital cities showed for May and June 2014 [Appendix 1]:

- Peak viewing hours for children and adolescents aged 0-17 years were between 6pm and 8.30pm, where they represented over 20% of the viewing audience. At around 7.30pm, they represented nearly 25% of the audience.
- At 9.30pm, around 10% of the audience was still under the age of 18.
- Many of the highest reaching programs for children aged 0-17 years in the last 12 months (excluding sport) were programs broadcast from or at 7.30pm: The Voice – Launch (419,000); My Kitchen Rules – Grand Final (345,000); and The Block: Fans v Faves – Grand Final (311,000).

These ratings figures are likely to underestimate the number of Australian children watching television as they do not include regional viewing patterns. It is evident that if alcohol

²³ Jones S & Magee C. Exposure to Alcohol Advertising and Alcohol Consumption among Australian Adolescents. *Alcohol & Alcoholism*. 2011;46(5):630-637.

²⁴ Fielder L, Donovan R J, Ouschan R. Exposure of children and adolescents to alcohol advertising on Australian metropolitan free-to-air television. *Addiction*. 2009; 104:1157-1165.

²⁵ Pettigrew S, Roberts M, Pescud M, Chapman K, Quester P & Miller C. The extent and nature of alcohol advertising on Australian television. *Drug and Alcohol Review*. 2012;31:797-802.

²⁶ OzTam. About OzTam [Website]. Available at: <http://www.oztam.com.au/AboutOzTAM.aspx>

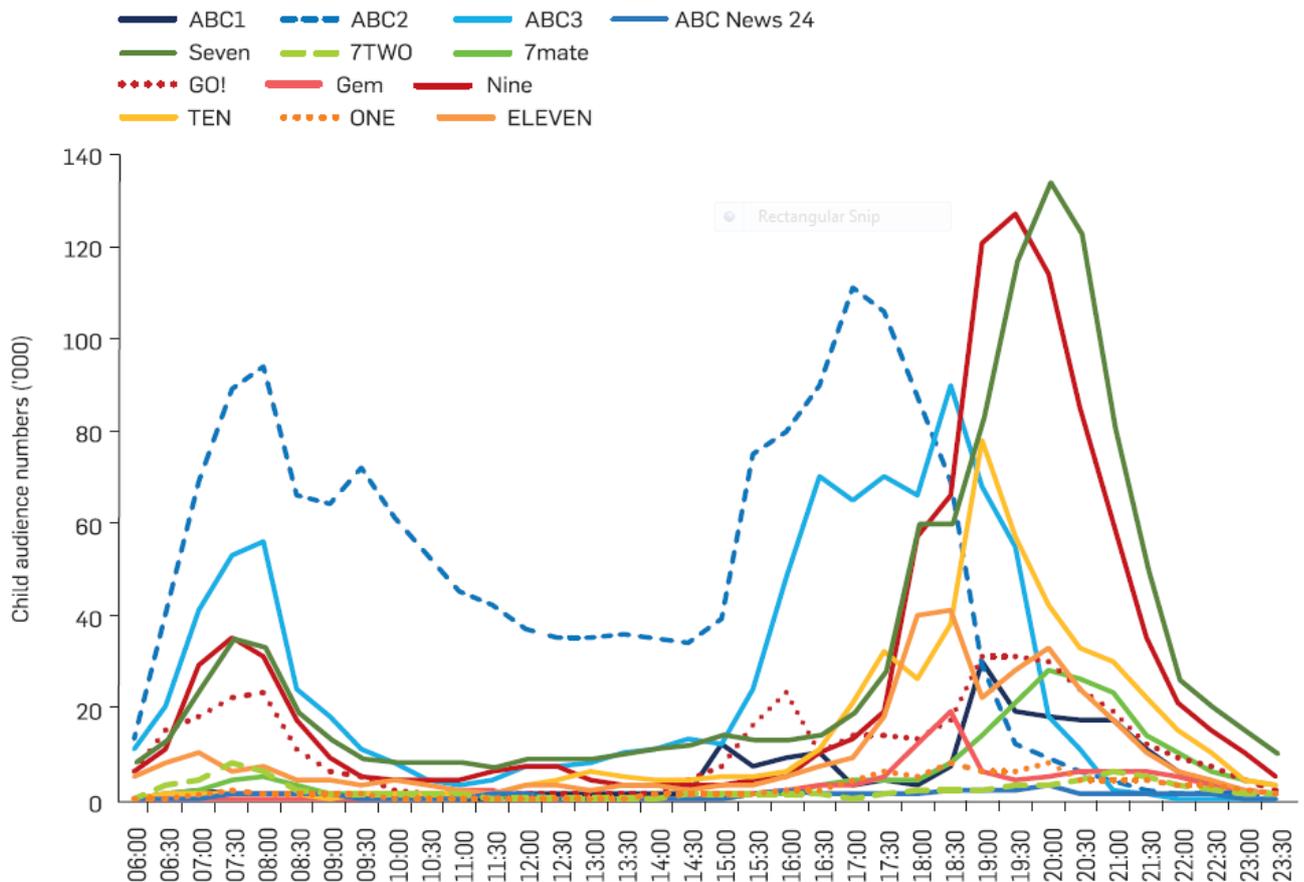
advertisements were allowed to be broadcast from 7.30pm, hundreds of thousands of Australian children would be exposed.

This OzTam data is consistent with other reports by industry groups including Screen Australia and ACMA. A 2013 report by Screen Australia, 'Child's Play – Issues in Australian Children's Television'²⁷ included a ratings analysis for children aged 2 to 14 years. Screen Australia reported that although there was a peak in children's viewing across most channels during mornings and afternoons, the highest audiences for children were during the early evening. Much of the content broadcast during this period is considered 'family friendly', and includes programs such as X Factor, Big Brother and The Big Bang Theory.

Screen Australia's graph below shows that for channels 7 and 9, child audiences peak between the prime times of 7:00pm and 8:00pm on weekdays and begin to decline gradually after that time.

The graph and the OzTam data in Appendix 1 illustrate clearly that hundreds of thousands of young people are already exposed to alcohol advertisements broadcast from 8.30pm. Far more children would be exposed to alcohol advertisements on free to air television if they were broadcast from 7:30pm.

CHILD AUDIENCE NUMBERS ACROSS THE DAY, 6AM TO MIDNIGHT, WEEKDAYS

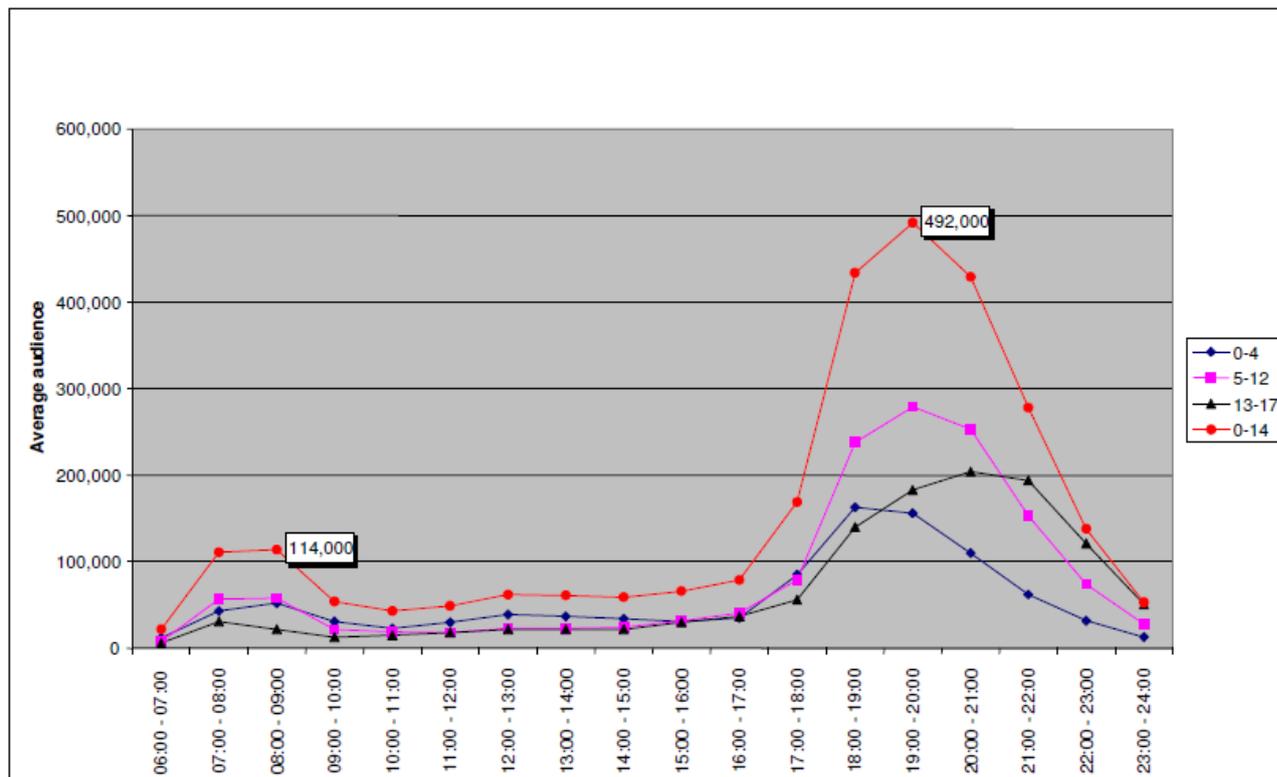


Source: OzTAM, 5-City-Metro, Average Audience across weekdays, 6am to midnight, Children 2-14, Weeks 42-45 2012, Consolidated.

²⁷ Screen Australia. Child's Play: Issues in Australian Children's Television. 2013. Available at: http://www.screenaustralia.gov.au/getmedia/fb6b35d9-5a95-4521-bbdb-8b12f59d1a87/Rpt_ChildsPlay.pdf

These viewing patterns are consistent with earlier data from ACMA. ACMA’s 2007 report found that on weekdays, the audience of children aged 0 – 14 years averaged more than 400,000, reaching a peak of 492,000 between 7:00pm and 8:00pm.²⁸

Figure 2.5: Commercial television viewing – average audience (Monday–Friday) size by hour (6.00 am to midnight) and age group (0–4, 5–12, 13–17 and 0–14), January–June 2006



A similar viewing pattern was observed on weekends, but with a larger child audience. Again, audiences between 0 – 14 years peaked between the 7:00pm and 8:00pm timeslot. On weekends, however, the child audience is a higher proportion of the total television viewing audience.

These reports and OzTam ratings data leave no doubt that the 7:00pm to 8:00pm timeslot on both weekdays and weekends attracts the largest child audience for free-to-air television, and tens of thousands of young people are watching television until 10.30pm. Permitting alcohol advertisements to be broadcast from 7:30 in the evening would therefore result in them being viewed by substantially more children and young people. 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. Based on children’s and young people’s viewing patterns, alcohol advertisements should be restricted to later viewing times, not brought forward. Community support for this is strong; 73% of Australians support limiting television advertising of alcohol until after 9.30pm.²⁹

²⁸ Australian Communications and Media Authority (ACMA), Children’s Viewing Patterns on Commercial, Free-to-Air and Subscription Television. May 2007. Available at: http://www.acma.gov.au/webwr/_assets/main/lib310132/children_viewing_patterns_commercial_free-to-air_subscription_television.pdf

²⁹ Australian Institute of Health and Welfare 2014. National Drug Strategy Household Survey detailed report 2013. Drug statistics series no. 28. Cat. no. PHE 183. Canberra: AIHW.

The current and proposed Codes permit commercials for alcoholic drinks to be broadcast during the M classification zone. There appears to be no rationale as to why alcohol advertising is tied to the M classification zone. Alcohol is no ordinary commodity, and alcohol advertising should be treated differently to other content. “Material classified M is for mature audiences” and is “recommended for viewing only by persons aged 15 years or over” [part B, page 31 of the proposed Code]. The legal purchasing age for alcohol is 18 years. Logically, alcohol should only be advertised during programs for adults over the age of 18; and it’s noted that content rated R or X18+ is not permitted on commercial free-to-air television [part C, page 2 of the proposed Code]. The broadcast of alcohol advertising should be considered separately from the M classification.

Recommendations

- Decisions about if and when alcohol advertisements can be broadcast should be based on the evidence about the impact of alcohol ads on young people and young people’s TV viewing patterns.
- Free TV Australia should make available for independent analysis data on the viewing patterns of children and young people up to 25 years.
- Alcohol advertisements should only be broadcast outside of children and adolescents’ popular television viewing times and should be considered separately from the M classification.
- In order to reduce exposure among children’s and adolescents, a watershed time for alcohol advertisements should be much later than the proposed 7.30pm or the current time of 8.30pm. A more appropriate time that would minimise children and young people’s exposure to alcohol advertisements would be 10.30pm. This recommendation is supported by OzTam data outlining children and young people’s viewing patterns.

Alcohol advertisements during sports broadcasts

The current Code includes an inexplicable exemption that allows alcohol advertisements to be broadcast as an accompaniment to the live broadcast of a sporting event on weekends and public holidays.³⁰ Rather than closing this loophole to minimise young people’s exposure to alcohol advertising, the proposed Code widens the exemption by using the term ‘sports broadcast’ instead of the defined term, ‘Live Sporting Event’. In practice, this would permit alcohol advertisements to be broadcast during any local, national, or international sporting event on the weekend and on public holidays. There appears to be no rationale for this loophole other than benefiting commercial interests.

To what extent are children and adolescents exposed to alcohol advertising during sports broadcasts?

The rationale for the exemption, as explained in the materials accompanying the proposed Code, is that, “the audience for sport is overwhelmingly comprised of adults. Ratings data shows that children constitute a very small percentage of the audience for sporting events, and those children viewing are doing so predominantly in the company of an adult.” No reference has been provided to support this assertion. These data should be made publicly available so that the public can evaluate the evidence underpinning the exemption. The McCusker Centre has written to Free TV on two occasions requesting that the original data be made publicly available in order for other stakeholders to make a complete assessment of the evidence. Free TV has not responded to this request.

³⁰ Commercial Television Industry Code of Practice January 2010 (incorporating amendments to July 2013) s 6.7.

The assertion that sports programs are not popular with young people is not supported by an ACMA report that shows that in 2006, three of the top 50 rating programs among people aged 0 – 14 were sports events.³¹ The Oztam data in Appendix 1 shows hundreds of thousands of Australian children and young people watch sport on television. Oztam data for the five Australian capital cities alone shows:

- Up to 19% of the viewing audience for major sporting events in 2014 and 2015 were under the age of 18;
- 19.07% of the TV audience for the 2014 FIFA World Cup Chile v Australia match were under 18 (332,000);
- The 2014 AFL Grand Final was viewed by 376,000 young people aged 0-17, representing 13.30% of the total viewing audience;
- The 2014 Rugby League Grand Final attracted 342,000 viewers aged 0-17, representing 13.05% of the total viewing audience;
- Almost 15% of the audience who watched the third 2014 State of Origin Rugby League match was aged 0 – 17 (302,000);
- Children and adolescents under 18 represented around 10% of the viewing audience for several one-day-cricket events in 2014 and 2015.

It should further be noted that co-viewing with parents does not reduce young people's exposure to alcohol advertising. As noted above, this information is for the five capital cities, so only represents approximately two-thirds of the population and likely numbers exposed.³²

As demonstrated by ratings data, the use of audience percentage as a measure of how many children watch television at certain times is inadequate. For example, 10.22% of the TV audience for a One Day Cricket Australia v India Game 2 was under the age of 18, a total of 151,000 viewers aged 0-17. Only 7.17% of the audience watching the 2015 Australian Open Men's Final tennis match was under the age of 18, but this represented 135,000 viewers aged 0 – 17. What Free TV regards as a 'very small percentage' may equate to hundreds of thousands of children and young people being exposed to alcohol advertising.

Health organisations are not only concerned about children's exposure to alcohol advertising, but also about young people up to 25 years for a range of reasons, not least the impact of alcohol on the developing brain. Free TV Australia's consultation paper appears to downplay the impact of proposed changes to the Code by referring only to "children".

How are young people influenced by viewing alcohol advertisements during sports broadcasts?

Alcohol and sports are strongly associated in Australia, due in large part to prolific advertising during broadcasts and sponsorship of events by alcohol companies.³³ Through these promotions, young people come to associate alcohol with sporting success and sporting role models.

³¹ Australian Communications and Media Authority (ACMA), Children's Viewing Patterns on Commercial, Free-to-Air and Subscription Television' May 2007. Available at: http://www.acma.gov.au/webwr/_assets/main/lib310132/children_viewing_patterns_commercial_free-to-air_subscription_television.pdf

³² Australian Bureau of Statistics (ABS). Feature Article: Capital Cities: Past, Present and Future. 2014. Available at: <http://www.abs.gov.au/ausstats/abs@.nsf/products/AC53A071B4B231A6CA257CAE000ECCE5?OpenDocument#PARALINK3>

³³ Jones S. When does alcohol sponsorship of sport become sports sponsorship of alcohol? A case study of developments in sport in Australia. *International Journal of Sports Marketing & Sponsorship*. 2010; April: 250-261.

Two small-scale studies have investigated the potential for alcohol advertising during televised sports to influence Australian young people's beliefs about alcohol.³⁴ The first found that alcohol advertising during televised sports contained features known to appeal to children and messages that could associate alcohol with sporting success. These included the use of humour, scenes showing people laughing, the use of animal mascots and sporting celebrities. The second investigated the level of awareness among primary school aged children of alcohol sponsors and brands advertised during televised sports. The children showed strong familiarity with the advertised alcohol products and brands and identified alcohol as a product preferred by males, young people, funny people and men who play sport.

Maintaining this loophole ignores the recommendations of expert health organisations and agencies.³⁵ There are well-publicised concerns about linking alcohol and sport, and Cancer Council WA and McCusker Centre are concerned about all forms of alcohol promotion, including alcohol sponsorship and sport. The use of sportspeople as mobile billboards for alcohol brands is detrimental to the thousands of Australian children who spend their weekends watching their favourite sports. Sponsorship is an important strategy for 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.³⁶ Alcohol sponsorship of sporting organisations and events is a key method through which young people are exposed to alcohol promotion. Recent Australian research found children absorb sports sponsorship messages, with 76% of children aged 5 to 12 years able to correctly match at least one sport with its relevant sponsor.³⁷

Alcohol sponsorship of sport also 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 endorsing their products. Sporting organisations' close ties with the alcohol industry also mean that groups who would be expected to be natural allies of the health field may support alcohol industry positions. Research shows that nearly three quarters of elite athletes disagree that athletes should promote unhealthy foods and alcohol,³⁸ and alcohol sponsorship of sports and children's sporting heroes deprives health groups of supporters, advocates, and role models.

³⁴ Jones S, Phillipson L & Barrie L. 'Most men drink...especially like when they play sports' – alcohol advertising during sporting broadcasts and the potential impact on child audiences. *Journal of Public Affairs*. 2009;10:59-73. Both studies were reported in this single journal article.

³⁵ Australian Medical Association (AMA). Position Statement: Alcohol Consumption and Alcohol-related Harms. 2012. Available at: <https://ama.com.au/position-statement/alcohol-consumption-and-alcohol-related-harms-2012>; National Preventative Health Taskforce. Australia: the healthiest country by 2020. Technical Report No 3. Preventing alcohol-related harm in Australia: a window of opportunity. 2009. Available at: [http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/\\$File/alcohol-jul09.pdf](http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/$File/alcohol-jul09.pdf)

³⁶ Hastings G. "They'll Drink Bucket Loads of the Stuff": An Analysis of Internal Alcohol Industry Advertising Documents. London: Alcohol Education and Research Council; 2009. Memorandum by Professor Gerard Hastings, Institute for Social Marketing, University of Stirling and the Open University.

³⁷ Pettigrew S, Rosenberg M, Ferguson R, Houghton S, and Wood L. Game on: do children absorb sports sponsorship messages? *Public Health Nutrition* 2013;16 (12): 2197-2204

³⁸ Grunseit AC, MacNiven R, Orr R, Grassmayr M, Kelly B, Davies D, et al. Australian athletes' health behaviours and perceptions of role modelling and marketing of unhealthy products. *Health Promotion Journal of Australia*. 2012; 23(1):63-9.

Recommendations

- The exemption relating to alcohol advertising during sports broadcasts should be removed from the proposed Code. Removing this loophole should be supported by the removal of all alcohol promotion from sport including alcohol sponsorship of sporting events and teams.
- Free TV Australia should make available for independent analysis data on audiences for weekend televised sports, including ratings data for children and young people up to 25 years.

Definition of ‘commercial for alcoholic drinks’

‘Commercial for alcoholic drinks’ is defined in the proposed Code as: “... a Commercial that directly promotes the use or purchase of one or more Alcoholic Drinks. It does not include:

- a) Program sponsorship announcements;
- b) a Commercial which does not directly promote an alcoholic drink for an entity or company that participates in the manufacture, distribution or sale of alcoholic drinks;
- c) a Commercial where alcohol or a brand associated with alcohol is incidental and any alcohol consumption responsibly depicted;
- d) a Commercial for a licensed restaurant or club, entertainment venue, tourist attraction or dining establishment.”

The exemptions serve to weaken the provisions of the Code that apply to alcohol advertising on television. The addition of exemption (c) is particularly concerning because it is unclear how it will be interpreted and applied in practice. The placement of all forms of alcohol promotions on television should be regulated by the Code provisions, including program sponsorship announcements. The inclusion of exemption (b) allows manufacturers and retailers of alcohol to build brand awareness and promote their products indirectly without restriction. Provision (d) has been expanded from the current Code to include other types of licensed premises beyond ‘licensed restaurants’. It appears the proposed Code will allow certain types of alcohol advertisements and promotions to be broadcast outside the watershed times.

The definition of a commercial for an alcoholic drink in the current and proposed Code is too narrow. ‘A Commercial that directly promotes the use or purchase of one or more Alcoholic Drinks’ specifically excludes sports sponsorship at televised sports events; the airing of brand logos; and product placement during television programs. All alcohol brand promotion should be covered by the Code and tightly restricted, including the marketing of alcohol brands and products, licensed premises, and alcohol sponsorship of sport and events. A comprehensive definition of ‘commercial for alcoholic drinks’ is required, and the Code should remove exemptions to the definition which may allow alcohol promotion in times outside the watershed.

Recommendation

- The exemptions to the definition of ‘commercial for alcoholic drinks’ should be removed and the definition should be amended so it applies to all direct or indirect alcohol promotions.

Complaints process

The complaints process should be simple and clear for all community members to engage in, and should operate in a timely manner. Complainants must make complaints to the

broadcaster within 30 days, while a broadcaster is given 30 working days to respond. It would seem that 30 working days is very generous, and could encourage substantial delays in the process.

The McCusker Centre has had experience with the complaints process associated with the Code. In November 2011, we identified what appeared to be disguised advertisements for VB Beer on a number of occasions during the Channel Nine broadcast of international cricket matches. During the commentary of the cricket series, the commentator blatantly promoted the VB beer brand as part of the commentary, without any indication that it was an advertisement. The wording used appeared to be identical to that used in VB beer advertisements.

A complaint was sent to the Chair of ACMA on 7 December 2012. An acknowledgement was received from the Chair on 21 December 2012. The letter indicated that ACMA would open an 'own motion' investigation as by the time the letter reached ACMA, the McCusker Centre was precluded from making a complaint to Channel Nine about the broadcast given more than 30 days had passed since the broadcast.

An investigation report from ACMA was received on 3 May 2015, around 5 months after the original complaint was made and 6 months after the broadcast of the cricket commentary. ACMA dismissed the complaint, as "ACMA is of the view that the ordinary, reasonable viewer would have been aware that the segment was distinct from the rest of the broadcasts". The McCusker Centre was concerned that this type of alcohol promotion was considered by ACMA to be compliant with the Code. It is evident the Code needs to tightly restrict all forms of alcohol promotion. Our experience suggests that the complaints process is slow and the Code is not in line with community standards.

Process and approach of the proposed Code

We have a number of concerns about the process and approach Free TV took in the development of the proposed Code, including:

1. The consensus among health and other organisations concerned with preventing harm from alcohol is that the regulation of alcohol advertising should be independent of the alcohol and advertising industries.³⁹ Self-regulation has consistently been found to be ineffective.⁴⁰
2. Health organisations actively support effective regulation across all platforms. The regulation of alcohol promotion on television should not be weakened; it is necessary for effective regulation to be introduced for other marketing platforms, including digital media.
3. Very limited public consultation occurred prior to the development of the proposed Code. According to Free TV Australia, public consultation occurred through ACMA's

³⁹ See World Health Organization (WHO). Global Strategy to Reduce the Harmful Use of Alcohol. 2010. Available at: http://www.who.int/substance_abuse/alcstratenglishfinal.pdf?ua=1; Australian Medical Association. Alcohol Marketing and Young People: Time for a new policy agenda. Canberra: AMA; 2012; National Preventative Health Taskforce. Australia: the healthiest country by 2020. Technical Report No 3. Preventing alcohol-related harm in Australia: a window of opportunity. 2009. Available at: [http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/\\$File/alcohol-jul09.pdf](http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/$File/alcohol-jul09.pdf)

⁴⁰ Moodie R, Stuckler D, Monteiro C et al. Profits and pandemics: prevention of harmful effects of tobacco, alcohol, and ultra-processed food and drink. *The Lancet*. 2013; 381(9867):670-679.

2013 Contemporary Community Safeguards Inquiry.⁴¹ There were only 40 formal submissions received to this inquiry, many from television and industry representative groups. If there was a genuine intention to “uphold community standards”, there should have been extensive and appropriate consultation prior to the development of the proposed code so that it accurately reflected the substantial community concern about young people’s exposure to alcohol advertising. This should be done by ACMA or an alternative independent body.

4. The development of a new Code and appropriate controls on alcohol advertising should be based on the evidence about the impact of alcohol advertising on young people and young people’s TV viewing patterns. The use of audience percentage as a measure of how many children watch television at certain times is inadequate. Even a small percent of TV audience under the age of 18 may represent hundreds of thousands of children and young people being exposed to alcohol advertising.
5. To date, Free TV Australia has largely dismissed broader community concern about alcohol advertising and young people, and the recommendations of expert health groups. The World Health Organization,⁴² the Australian Medical Association,⁴³ the National Preventative Health Taskforce,⁴⁴ and other groups recommend restricting alcohol advertising during times and in places which have high exposure to children and young people as part of a comprehensive approach to reducing alcohol related harms. These recommendations include phasing out alcohol sponsorship of sport and removing alcohol advertising during sports broadcasts.
6. In recent media, the Free TV CEO commented that "Our complaints data shows this is not a major area of concern. Only 0.13 per cent of complaints made from 2009 to 2013 were about alcohol advertising."⁴⁵ Contrary to the views of Free TV, community surveys and the volume of complaints to other adjudication processes provide substantial evidence that alcohol advertising and promotion is of serious concern to the community. The Alcohol Advertising Review Board (AARB) was developed by the McCusker Centre and Cancer Council WA, with support from health organisations around Australia, in response to the weaknesses of the current self-regulatory advertising system. The role of the AARB is to review community complaints about alcohol advertising and deliver reasoned and considered determinations, free of industry influence. In the three years of AARB operation, the AARB received 171 complaints related to alcohol advertising on television, including alcohol advertisements during commercial breaks and alcohol sponsorship of sport seen during sports broadcasts. Community support for curbs on alcohol advertising is strong; 73% of Australians support limiting television advertising of alcohol until after

⁴¹ Australian Communications and Media Authority (ACMA). *Contemporary community safeguards inquiry: Consolidated report*. March 2014. Available at: http://www.acma.gov.au/~media/Broadcasting%20Investigations/Report/pdf/ACMA_Contemporary%20community%20safeguards%20inquiry_Consolidated%20report_March%202014%20pdf.pdf

⁴² World Health Organization (WHO). *Global Strategy to Reduce the Harmful Use of Alcohol*. 2010. Available at: http://www.who.int/substance_abuse/alcstratenglishfinal.pdf?ua=1

⁴³ Australian Medical Association (AMA). *Position Statement: Alcohol Consumption and Alcohol-related Harms*. 2012. Available at: <https://ama.com.au/position-statement/alcohol-consumption-and-alcohol-related-harms-2012>

⁴⁴ National Preventative Health Taskforce. *Australia: the healthiest country by 2020. Technical Report No 3. Preventing alcohol-related harm in Australia: a window of opportunity*. 2009. Available at: [http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/\\$File/alcohol-jul09.pdf](http://www.preventativehealth.org.au/internet/preventativehealth/publishing.nsf/Content/09C94C0F1B9799F5CA2574DD0081E770/$File/alcohol-jul09.pdf)

⁴⁵ Alexander, H. ‘Alcohol to be promoted more to children under proposed TV code loophole.’ *Canberra Times*. 20 March 2015. Available at: <http://www.canberratimes.com.au/nsw/alcohol-to-be-promoted-more-to-children-under-proposed-tv-code-loophole-20150319-1m2nhr.html>

9.30pm⁴⁶ and 72% of Australian adults support legal controls to reduce young people's exposure to alcohol advertising, with only 7% opposed.⁴⁷

Some changes to the current Code were not outlined in full in the explanatory materials provided for public consultation. In some cases, minor amendments to the wording of provisions may have substantial implications for exposure to alcohol advertising; for example, the removal of the word 'live' from the sports loophole and additions to the exclusions under the definition of a 'commercial for alcoholic drink'. The lack of clear information provided by Free TV Australia makes it very difficult for the public to comment on all the proposed changes to the Code.

Recommendations

- Community and public interest should be the primary objective of the review of the Code, with a particular focus on the impact on children and adolescents.
- The controls on alcohol advertising and promotion within the Code should be strengthened, not weakened. Comprehensive regulation of alcohol marketing across all platforms is required in order to reduce young people's exposure to alcohol promotion, and adequate regulation of advertising and promotion on TV must be a part of that.
- All submissions to Free TV Australia in the Code review process should be made publicly available online.

Should you wish to clarify any matter raised in this submission, please contact Caitlin Kameron, Legal Policy Advisor, Cancer Council WA on (08) 9388 4315 or ckameron@cancerwa.asn.au or Hannah Pierce, Information and Research Officer, McCusker Centre on (08) 9266 7117 or hannah.pierce@curtin.edu.au

Yours sincerely,

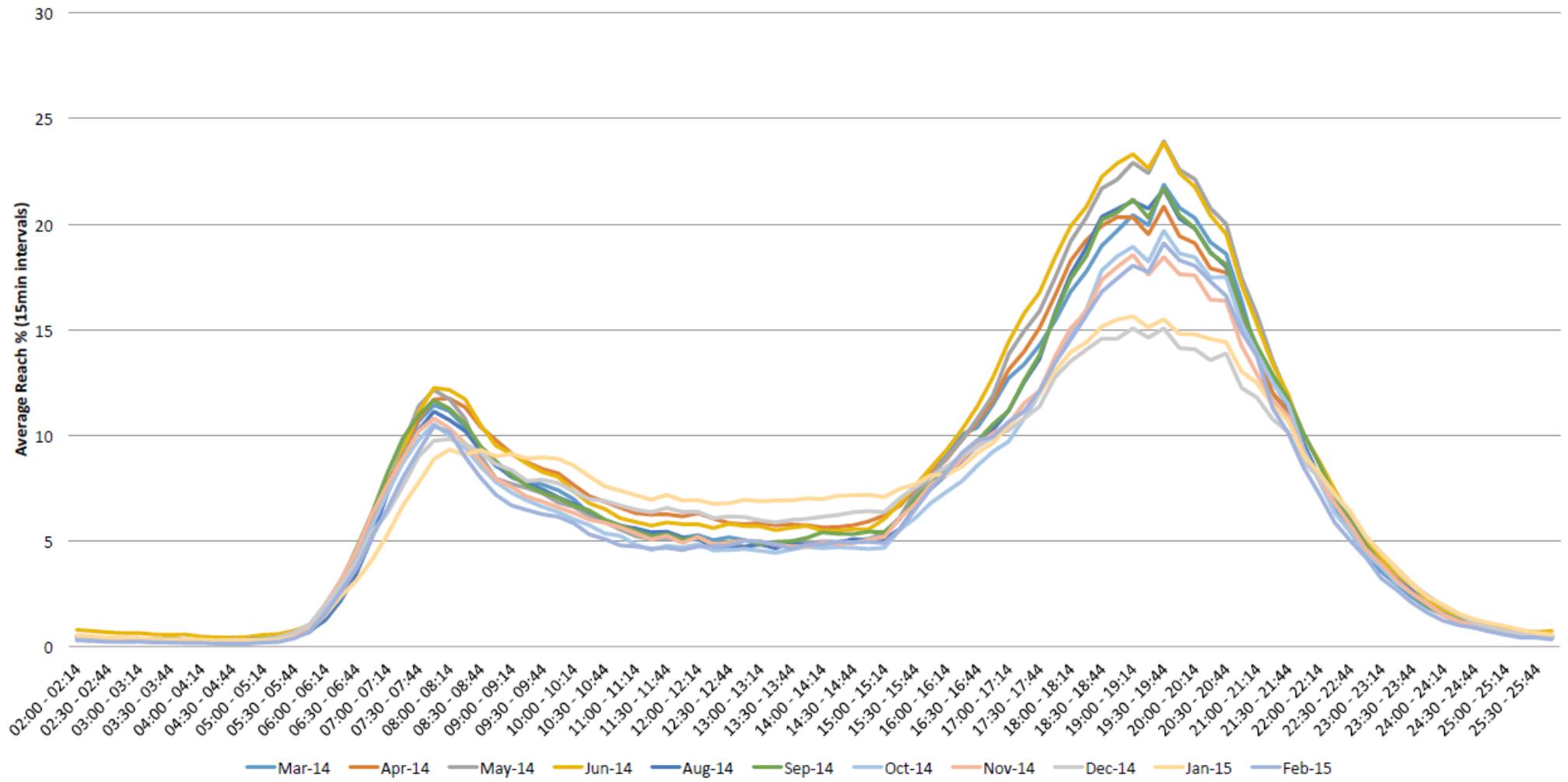
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⁴⁶ Australian Institute of Health and Welfare 2014. National Drug Strategy Household Survey detailed report 2013. Drug statistics series no. 28. Cat. no. PHE 183. Canberra: AIHW.

⁴⁷ Independent market research commissioned by the McCusker Centre for Action on Alcohol and Youth and the Foundation for Alcohol Research and Education, June 2013. Available at: www.mcaay.org.au

Average Reach % PPL0-17yrs, 5 Cap City, 15min intervals



Moving Year: 1/03/2014 - 28/02/2015		Projections (000s)								Percentage of under 18 audience	
Sports - Ranked by Total People Audience		Total People	P 18-24	P 25-39	P 40-54	P 55-64	P 65+	P 0-12	P 0-17	% 0-17	%0-12
		Metro 5 Cap City	Metro 5 Cap City	Metro 5 Cap City	Metro 5 Cap City	Metro 5 Cap City	Metro 5 Cap City	Metro 5 Cap City	Metro 5 Cap City		
SEVEN'S AFL: GRAND FINAL: SYDNEY V HAWTHORN	ATN7, HSV7, BTQ7, SAS7, TVW7	2,828	225	549	661	394	623	259	376	13.30%	9.16%
RUGBY LEAGUE GRAND FINAL	TCN9, GTV9, QTQ9, NWS9, STW9	2,621	186	634	654	359	445	227	342	13.05%	8.66%
STATE OF ORIGIN RUGBY LEAGUE NSW V QLD 2ND - MATCH	TCN9, GTV9, QTQ9, NWS9	2,600	201	655	690	336	385	207	333	12.81%	7.96%
SEVEN'S AFL: GRAND FINAL: PRESENTATIONS	ATN7, HSV7, BTQ7, SAS7, TVW7	2,565	203	506	584	352	591	229	329	12.83%	8.93%
STATE OF ORIGIN RUGBY LEAGUE QLD V NSW 1ST - MATCH	TCN9, GTV9, QTQ9, NWS9	2,530	150	661	644	346	375	213	355	14.03%	8.42%
SEVEN'S AFL: GRAND FINAL: ON THE GROUND	ATN7, HSV7, BTQ7, SAS7, TVW7	2,188	153	399	495	306	503	241	332	15.17%	11.01%
THE 2014 MELBOURNE CUP CARNIVAL: MELBOURNE CUP-THE RACE	ATN7, HSV7, BTQ7, SAS7, TVW7	2,184	118	389	437	357	681	167	202	9.25%	7.65%
STATE OF ORIGIN RUGBY LEAGUE QLD V NSW 3RD - MATCH	TCN9, GTV9, QTQ9, NWS9	2,057	152	490	507	289	317	187	302	14.68%	9.09%
SEVEN'S TENNIS: 2015 AUST OPEN - MEN'S FINAL	ATN7, HSV7, BTQ7, SAS7, TVW7	1,882	116	442	446	283	460	91	135	7.17%	4.84%
SEVEN'S TENNIS: 2015 AUST OPEN - NIGHT 9 KYRGIOS V MURRAY	ATN7, HSV7, BTQ7, SAS7, TVW7	1,854	122	376	399	294	523	95	139	7.50%	5.12%
SEVEN'S AFL: GRAND FINAL: POST MATCH	ATN7, HSV7, BTQ7, SAS7, TVW7	1,841	142	338	422	262	440	165	238	12.93%	8.96%
RUGBY LEAGUE GRAND FINAL PRESENTATION	TCN9, GTV9, QTQ9	1,768	140	426	461	229	295	137	217	12.27%	7.75%
2014 FIFA WORLD CUP LIVE: CHI V AUS	SBS1 Syd, SBS1 Mel, SBS1 Bri, SBS1 Ade, SBS1 Per	1,741	79	440	429	216	247	240	332	19.07%	13.79%
SEVEN'S AFL: GRAND FINAL: PRE MATCH ENTERTAINMENT	ATN7, HSV7, BTQ7, SAS7, TVW7	1,711	132	300	390	245	411	164	234	13.68%	9.59%
STATE OF ORIGIN RUGBY LEAGUE QLD V NSW 1ST - PRE MATCH	TCN9, GTV9, QTQ9, NWS9	1,703	92	408	423	223	253	199	304	17.85%	11.69%
STATE OF ORIGIN RUGBY LEAGUE NSW V QLD 2ND - PRE MATCH	TCN9, GTV9, QTQ9, NWS9	1,699	129	410	466	207	235	182	252	14.83%	10.71%
THE 2014 MELBOURNE CUP CARNIVAL: MELBOURNE CUP-RACE PRESENTATIO	ATN7, HSV7, BTQ7, SAS7, TVW7	1,656	82	291	340	243	523	150	176	10.63%	9.06%
FOOTBALL: ASIAN CUP 2015 FINAL AUS V KOR EXTRA TIME-LE	ABC Syd, ABC Mel, ABC Ade, ABC Per	1,648	98	339	346	251	433	117	181	10.98%	7.10%
RUGBY LEAGUE GRAND FINAL ENTERTAINMENT	TCN9, GTV9, QTQ9, NWS9, STW9	1,495	88	356	372	222	260	139	199	13.31%	9.30%
ONE DAY CRICKET -AUS V INDIA GAME 2 SESSION 2	TCN9, GTV9, QTQ9, NWS9, STW9	1,477	65	330	342	222	366	101	151	10.22%	6.84%
THE 2014 MELBOURNE CUP CARNIVAL: MELBOURNE CUP-THE MOUNTING YAR	ATN7, HSV7, BTQ7, SAS7, TVW7	1,453	82	244	271	219	505	105	132	9.08%	7.23%
STATE OF ORIGIN RUGBY LEAGUE QLD V NSW 3RD - PRE MATCH	TCN9, GTV9, QTQ9, NWS9	1,384	88	298	350	192	228	148	228	16.47%	10.69%
SEVEN'S V8 SUPERCARS ROUND 11: BATHURST D3 THE RACE	ATN7, HSV7, BTQ7, SAS7, TVW7	1,357	48	278	453	231	215	97	132	9.73%	7.15%
AUST FIA FORMULA ONE WORLD CHAMPIONSHIP 2014 - RACE	TEN10, ATV10, TVQ10, ADS10, NEW10	1,355	70	342	343	219	248	103	134	9.89%	7.60%
THIRD TEST - AUSTRALIA V INDIA SESSION 3	TCN9, GTV9, QTQ9, NWS9, STW9	1,300	51	236	272	223	405	78	112	8.62%	6.00%
STATE OF ORIGIN RUGBY LEAGUE NSW V QLD 2ND - POST MATCH	TCN9, GTV9, QTQ9	1,247	115	330	359	162	140	80	142	11.39%	6.42%
RUGBY LEAGUE FINAL SERIES PF1	TCN9, QTQ9	1,212	77	247	331	192	204	108	162	13.37%	8.91%
ONE DAY CRICKET -AUS V SA GAME 5 SESSION 2	TCN9, GTV9, QTQ9, NWS9, STW9	1,183	46	256	297	199	288	53	97	8.20%	4.48%
ONE DAY CRICKET -AUS V ENGLAND GAME 1 SESSION 2	TCN9, GTV9, QTQ9, NWS9, STW9	1,123	46	211	262	177	316	69	110	9.80%	6.14%
SEVEN'S TENNIS: 2015 AUSTRALIAN OPEN - NIGHT 9	ATN7, HSV7, BTQ7, SAS7	1,110	54	221	261	180	269	82	124	11.17%	7.39%
SEVEN'S TENNIS: 2015 AUSTRALIAN OPEN - NIGHT 7	ATN7, HSV7, BTQ7, SAS7	1,107	56	235	214	172	334	66	95	8.58%	5.96%
TWENTY/20 - AUSTRALIA V SOUTH AFRICA GAME 3	TCN9, GTV9, QTQ9, NWS9, STW9	1,106	75	239	260	170	250	54	111	10.04%	4.88%
FOOTBALL: ASIAN CUP 2015 FINAL AUS V KOR LIVE-EV	ABC Syd, ABC Mel, ABC Ade, ABC Per	1,086	58	225	218	164	285	88	135	12.43%	8.10%