

Alcohol Advertising and Sponsorship.

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The public health sector has significant concerns about alcohol marketing due to its objective of encouraging alcohol consumption and the impact of alcohol on the burden of disease.

Australians are exposed to an extensive volume of alcohol marketing through many channels: advertising via traditional media, digital media, outdoor media; promotional activities; and, sponsorships.

Controlling the promotion of substances can have a positive impact. For example, the elimination of tobacco marketing has played a significant role in reducing tobacco use.

Some Australian peak bodies have identified the elimination of alcohol advertising as a key method of reducing alcohol-related harm.¹ Attempts to control or restrict alcohol marketing, however, are resisted by the alcohol industry and its powerful corporate collaborators, including financial beneficiaries such as the advertising industry, electronic and print media and a number of major sporting bodies.

The issues of alcohol advertising and sponsorship are heavily intertwined. Both expose children and adults to imagery and product-associated placement and the consumer may not differentiate between what is sponsorship and what is advertising.

The ADF has explored each issue in a dedicated position paper, however they should not be read in isolation of each other.

Alcohol Advertising.

What is it?

Alcohol advertising is the paid promotion of alcoholic beverages through various platforms including television and radio broadcast, social media, print media, outdoor billboards and online.

Constitutional responsibility for monitoring alcohol advertising is shared between the Commonwealth, which is responsible for corporations and broadcasting, and the states and territories which retain responsibility for some forms of advertising in public spaces.

Regulatory codes

Alcohol advertising and marketing is governed by a mix of quasi-regulatory and self-regulatory regimes – with limited or no involvement of government – and is subject to general and specific forms of regulation

Format	Regulating body	Commentary
All alcohol marketing and advertising material	Australian Consumer Law and state-based fair-trading legislation	Subject to general advertising codes and specific media codes of practice.
	Australian Association of National Advertisers (AANA); self-regulated body, administered by Ad Standards	AANA’s Code of Ethics applies to alcohol advertising, as does its Code for Advertising and Marketing Communication to Children. ²
		The AANA ‘children’s code’ states: advertising directed toward children cannot relate to, or associate in any way, with alcohol products or companies that supply alcohol products. ³
	Ad Standards administers the AANA system and manages the complaint resolution process of the advertising self-regulation system in Australia. ⁴	

<p>Print, billboard, digital, cinema, television, radio advertisements and the naming and packaging of alcohol products point-of-sale and other marketing.</p>	<p>Alcohol Beverages Advertising Code (ABAC) Scheme^{5,6}; voluntary code</p>	<p>The ABAC Scheme is funded by industry and administered by a management committee comprising alcohol industry peak bodies: the Brewers Association; Spirits and Cocktails Inc.; Australian Grape and Wine; Communications Council Ltd; and, an Australian Government appointee.⁵</p> <p>The ABAC Code states that alcohol advertising:</p> <ul style="list-style-type: none"> • must present a mature, balanced and responsible approach to the consumption of alcohol beverages • must not have a strong or evident appeal to children or adolescents • must not suggest that the consumption of alcohol may contribute to personal, business, social, sporting, sexual or other success • must not depict any direct association between the consumption of alcohol beverages and the operation of vehicles • must not challenge or dare people to consume or sample a particular alcohol beverage • must not encourage consumption that is in excess of, or inconsistent with, the Australian Alcohol Guidelines issued by the National Health and Medical Research Council • must comply with the Advertiser Code of Ethics adopted by the Australian Association of National Advertisers.⁵
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Complaints about alcohol advertisements	Ad Standards	Considers the advertisements against the Australian Association of National Advertisers (AANA) Code of Ethics, as well as other relevant and related codes (parallel assessment process with ABAC).
	ABAC Complaints Panel	Considers the advertisements against the ABAC's voluntary code. The ABAC Scheme has no legislative framework underpinning the system which means regulators have no power to issue penalties or infringements (parallel assessment process with Ad Standards).
TV and radio advertisements	Australian Communications and Media Authority via the Commercial Television Code of Practice and the Commercial Radio Code of Practice. ⁷	Alcohol advertising on free-to-air television is permitted in the M, MA or AV classification periods, i.e. adult viewing hours of 8.30pm-5.00am. ⁸ An exemption to the ban on alcohol advertising on television during children's viewing times operates to allow alcohol advertising during sports broadcasts on public holidays and weekends, starting from 6.00pm on Fridays. ^{8, 9}
		Little restriction is placed on alcohol advertising on subscription or pay TV broadcasters as they are required only 'to take into account the intellectual and emotional maturity of the intended audience'. ¹⁰
		No restriction is placed on the timing of alcohol advertising on radio. The only condition of the Commercial Radio Code of Practice is a prohibition on the presentation of the 'misuse of alcohol' as desirable. ¹¹

Outdoor advertisements	Outdoor Media Association	<p>OMA's Code of Ethics and Alcohol Advertising Guidelines require members to 'limit the advertising of alcohol products on fixed signs that are located within a 150-metre sight line of a primary or secondary school'.¹²</p> <p>This is inadequate as the restriction does not always apply where the school is in the vicinity of a club, pub or bottle shop, nor is advertising restricted at public transport hubs or on public transit vehicles such as buses and taxis (excepting where local and state/territory governments have initiated their own controls).</p>
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Point of sale promotions

Point of sale promotions (POS), which are not subject to regulation, are of increasing concern to the public health sector.

Typical POS promotions include price discounts for multi-unit purchases, shopper docket, purchase related gifts, competitions, games of chance and happy hours.

A review of research into alcohol price and promotion suggested point-of-sale promotions are likely to encourage higher consumption by young drinkers, binge drinkers and regular drinkers.¹³

An Australian investigation found young people aged 18-25 were influenced to purchase specific brands of liquor by in-store promotions.¹⁴ Further research showed that participation in point of sale promotions may be associated with an increase in the quantity of alcohol purchased, with 26.5% of respondents having purchased a product when there was a special offer, price discount, or sales promotion involved.¹⁵

Shopper dockets have also come under scrutiny. In 2016 officers of the NSW Office of Liquor Gaming and Racing investigated Coles' and Woolworths' shopper dockets and concluded 'there is sufficient evidence to support a preliminary view that the activity is likely to encourage the misuse and abuse of liquor'.¹⁶ The investigating officers proposed a ban on the practice but, following intervention by the supermarkets, the Office of Liquor Gaming and Racing's Director-General did not act on the advice.¹⁶

Why?

Children are frequently exposed to alcohol advertisements via sponsorship of high-profile sporting codes and television advertising, as well as via increasing digital and online promotion of alcohol – despite the conditions set out by the Alcohol Beverage Advertising Code (ABAC).¹⁷ New media (such as social media) advertising is increasingly sophisticated and provides an additional channel for the advertising of alcohol products.¹⁸

The two primary issues of concern are:

- the content of alcohol advertising (i.e. the messaging, imagery and narrative)
- children's levels of exposure to alcohol advertising (i.e. the frequency and volume of the advertising experienced by the child).

The World Health Organization recommends enforcing bans or comprehensive restrictions on exposure to alcohol advertising across all types of media and imposing restrictions or bans on alcohol sponsorship and activities targeting young people.¹⁹

Evidence

Young people are exposed to alcohol advertising through television, radio, print media, alcohol branded merchandise, and outdoor billboards.

Longitudinal studies^{20, 21} and experimental studies have shown that alcohol advertising and marketing promotes positive thoughts and attitudes (expectancies) towards alcohol, earlier initiation into drinking and higher levels of consumption.^{18, 22, 23}

Exposure to alcohol advertising and sponsorship is also associated with more positive attitudes to alcohol products and consumption.²⁴⁻²⁷

Systematic reviews have found a positive association between exposure to alcohol marketing and alcohol consumption and intention to drink.²⁸

This includes a strong association between exposure to alcohol advertising in magazines, television, in-store displays, sports venues, and young people's early initiation into drinking and/or increased consumption.²⁹

Exposure to alcohol advertising is one factor that shapes young people's attitudes to, and consumption of alcohol.³⁰⁻³²

Exposure to alcohol advertising is associated with normalising alcohol consumption,³³ young people's expectation of consuming alcohol, reduced age

of initiation and is associated with more harmful drinking practices such as excessive consumption.²⁰

Studies have found alcohol advertising during televised screening of sporting events contains a high number of breaches of industry advertising codes, such as using humour and associating consumption of alcohol with sexual or sporting success.³⁴⁻³⁶

A 2015 Australian study of alcohol advertising in sport³⁷ reported that in 2012 a total of 3544 alcohol advertisements were broadcast during televised AFL football (n=1942), cricket (n=941), and NRL (n=661). This represented 60% of all alcohol advertising during televised sport and 15% of all alcohol advertisements (n=23,936) on Australian TV. The audience for AFL, cricket and NRL in that year included 26.9 million children and adolescents, while 47% of children's and adolescents' exposure to alcohol advertising was during the daytime.

Australian alcohol advertisers spent an estimated \$128 million on advertising across multiple forms of media in 2007. This figure is likely conservative however as it does not take into account sponsorship, point-of-sale promotions or all social media platforms.³⁸ Outdoor advertising expenditure grew as a proportion of the total spend on alcohol advertising from 21% in 2005 to 32% in 2007.³⁸

Outdoor advertising is pervasive and unavoidable as ‘it cannot be turned off or put away if a consumer wishes to ignore it’.³⁹ It also contravenes the rule that alcohol should not be directed toward young people, as it is often featured on public transport infrastructure, including train stations, bus stop shelters and vehicles (trams and buses), where underage young people are regular passengers.

Outdoor advertising falls under the responsibility of state and local governments that can control public space. States have successfully used this power to regulate tobacco advertising. State and local governments can reduce the prevalence of outdoor alcohol advertising by preventing those displays on publicly owned assets such as public transport and provide compensation to sporting clubs and other bodies who reject those opportunities.

Non-traditional forms of alcohol promotions, such as co-creation of content on social media and experiential marketing, are methods by which alcohol marketers try to embed their brands and drinking practices into the digital social fabric and broader cultural practices.⁴⁰ These pose regulatory challenges that may be difficult to address.

Risk to ADF

The ADF might be accused of endangering the viability of sport by supporting an end to alcohol advertising during sporting broadcasts.

There is substantial evidence that exposure to various forms of alcohol advertising and promotion, including owning alcohol-branded merchandise, increases the likelihood that young people start drinking at a younger age, drink more if they have already initiated drinking, and engage in binge drinking.^{20, 21, 30, 41, 42}

Further Considerations

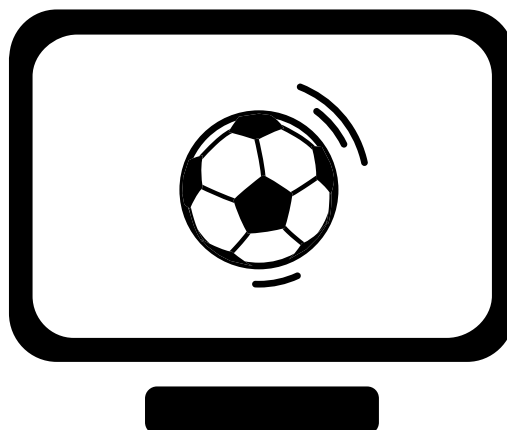
Popular support exists for protecting children from alcohol advertisements.

According to the Foundation for Alcohol Research and Education, results from the Annual Alcohol Poll 2018 show 62% of respondents believe alcohol advertising should be phased out from television during sporting broadcasts.⁴³

There is little evidence to support the efficacy of codes of practice as a mechanism for effective regulation of alcohol advertising and marketing. While alcohol advertising on digital media and social media poses a severe challenge to regulators, ending alcohol sponsorships of sport and cultural events will also help limit its impact.

Changes to alcohol advertising have already been implemented in some sporting codes in Western Australia – WA Rugby, WA Cricket, WA Country football.

It might also be considered to be inconsistent in opposing the advertising of a legal substance while supporting the liberalisation of illicit drugs via decriminalisation.



ADF position

1. No alcohol advertising should be permitted on television during childrens' viewing times. The exception for the broadcast of sport must be removed.
2. No alcohol advertising should be permitted on public property, including sports grounds, billboards or any public transport infrastructure.
3. Measures for the control of alcohol marketing on digital platforms and social media require urgent investigation.
4. State and Territory Liquor Acts should identify a non-exhaustive set of point of sale promotional practices that are prohibited due to their capacity to encourage unsafe consumption of alcohol.
5. Alcohol advertising should be controlled by an independent body with the power to impose substantial penalties, including fines, for breaches of the code.

Alcohol Sponsorship in Sport.

What is it?

Alcohol brands provide sponsorship funding and products for all levels of sport in Australia. Peak sporting bodies and the most popular spectator sports are beneficiaries of alcohol sponsorship as is, to a lesser degree, community level sport. This includes a wide range of sporting codes including Australian football, rugby, cricket, tennis, golf, motor racing and horse racing.

No restrictions are placed on sports sponsoring by alcohol companies, although some sports (Basketball Australia, Netball Australia and Baseball Australia to name a few) no longer accept alcohol sponsorship.⁴⁴

The prevalence of alcohol sponsorship means that people who play or watch sport in Australia are exposed to the message that the consumption of alcohol is a natural accompaniment to sporting activity.⁴⁵

Alcohol brands favour sports that are especially popular among (young) males who are also the heaviest drinking cohort in the population.⁴⁶ However, the sponsorship of sport provides a platform for brands to reach larger segments of the population, including children and adolescents, as sponsors provide support for individual athletes, national sports teams, and national, state, regional and local sporting competitions.

On an annual basis alcohol sponsorship of sporting and cultural events and associated promotions is valued at approximately \$50 million.⁴⁵

Over 7 million Australians attend at least one sporting event each year⁴⁷ and an estimated 12 million watch sport on commercial free to air TV each week. The volume of alcohol advertising during sport broadcasts is higher than during other programming.^{9, 48}

Sponsorship of high-profile sport typically involves multiple marketing strategies including event naming rights (e.g. Foster’s Melbourne Cup); the sponsor’s advertising on and around ovals, grounds and venues; logos on players’ uniforms; exclusive product rights at the event (e.g. pourage rights); commercial break advertisements during broadcasts; public address announcements and product endorsement by celebrity players.⁴⁴ As well as live spectators, the audience encompasses mass media and digital spectators, including those viewing on ‘second screens’ at the event.⁴⁴

At the community level, some leagues and associations accept alcohol sponsorships that require branded sports equipment and promotional material displayed at grounds.

Other forms of alcohol sponsorship of individual clubs can include free or discounted alcohol products, payment of competition fees, payment for uniforms and equipment and cash donations. In some instances, sponsors provide free alcohol after games and events at the sport venues, and free ‘bar tabs’ for sportspeople/ teams at their establishments (i.e. pubs, hotels, taverns).^{49, 50}

The impact of alcohol sponsorships at the community level on alcohol-related attitudes and consumption is not known; however, sponsorship of local sporting clubs often involves provision of alcohol to the players.⁴⁹

Why?

Alcohol sponsorship and advertising provides an abundant revenue stream for many of Australia's major sports, which form the Coalition of Major Professional Sports and Participation Sports (COMPPS.) COMPPS claims to represent more than 16,000 clubs and 9 million participants, and many more 'armchair fans' of sport.

At the elite professional level, alcohol brands compete against other advertisers to purchase naming rights and advertising time on TV networks - a contest that increases the sums that the networks can pay sporting codes for the right to broadcast the sport.

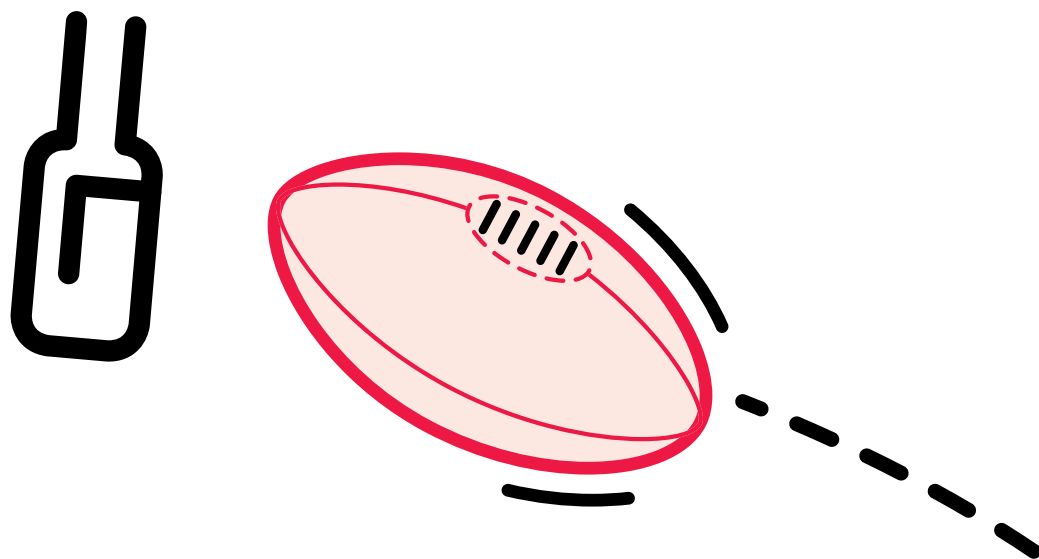
The financial benefit to both parties explains the fierce opposition of the networks and sporting codes to ending alcohol's sponsorship of sport.

Sports sponsorship is a powerful form of marketing because many Australians have an intense emotional bond with sport and their sporting heroes.

Sponsorship enables brands to benefit from an 'image transfer' where values such as healthy, fit, and energetic are transferred to the brand from sport, especially in association with sporting celebrities.⁵¹⁻⁵³

Sponsoring sport allows alcohol brands to reach demographics that officially are out-of-reach due to advertising code restrictions.

While alcohol marketing codes of practice agree that it is not permissible for alcohol to be marketed to young people,⁵ sport sponsorship facilitates the transmission of positive messages about alcohol brands to youth.



Evidence

More research attention has been given to alcohol sponsorship in Australia than alcohol advertising.

Some Australian research suggests that alcohol sponsorship of community clubs is relatively common and most often includes monetary funding as well as free or discounted alcohol supplies.⁵⁰

Within a sample of Australian University sportspeople, 33% reported receiving sponsorship from the alcohol industry.³⁴ A New Zealand study found male and female athletes who received various types of sponsorships from alcohol interests were more likely to drink hazardously than athletes not sponsored by alcohol brands, after adjusting for possible confounders.⁴⁹

Televised sporting events feature a high number of alcohol references and children and adolescents are exposed to them due to the daytime programming of sport. In one instance, over a one-hour period during the 2008 television broadcast of the Bathurst V8 car race, viewers saw 53 references to alcohol.⁵⁴

A recent study was conducted to examine whether children absorb alcohol-related sponsorship messages.⁵⁵ Children aged 4-15 years were shown a whiteboard with magnets that featured logos of alcohol, fast food, and gambling brands and a separate whiteboard with magnets of the logos of sports teams. The children were not given prompts relating to sponsorship and were told they could place the brand magnets anywhere on the whiteboard with the team logos. Three quarters (75%) of the children matched at least one brand magnet with a sport sponsored by that brand.

Much international research on alcohol sponsorship confirms the findings of Australian research. An international systematic review on the impact of exposure to alcohol sports sponsorship and subsequent alcohol consumption found all seven studies reported positive associations between exposure to alcohol sports sponsorship and self-reported alcohol consumption.²⁸

Two of the studies found indirect exposure to alcohol sports sponsorship was associated with increased levels of drinking amongst schoolchildren, and five studies found a positive association

between direct alcohol sports sponsorship and hazardous drinking amongst adult sportspeople.

A 2016 study looking at the impact of alcohol advertising in sport showed that incidental exposure to alcohol sponsorship in sport shapes implicit attitudes towards the advertised brand and alcohol in general.⁵⁶

A subtle form of sponsorship-related marketing is the branding of sponsored merchandise by alcohol companies which ensures the fans who wear their sporting heroes' shirts, guernseys, caps, and other materials are not only familiar with the sponsor's business but help to promote it, even though the brand is forbidden from marketing to children.

Adolescents who wear alcohol-branded clothing and own other alcohol-branded merchandise have a more positive attitude towards alcohol than other young people, initiate drinking earlier than other young people, and consume more alcohol than other young people.^{57, 58}

A marketing innovation has alcohol brands leveraging their sponsorship of sport by engaging consumers on interactive digital platforms (e.g. Facebook, Twitter, Instagram) in real time before, during and after the sporting event.^{17, 59}

This implicates the audience in the marketing process, as engagement of consumers via social media can involve them in the co-creation of content on behalf of the brand.^{17, 59} Brands call on consumers to take four kinds of action: to compete, to collaborate, to celebrate, and to consume.^{17, 59, 60} This style of alcohol marketing captures the participation of minors, is less visible and more difficult to regulate than mass media promotions.^{17, 59} While the effect has not been measured, internet alcohol marketing has been linked to regular drinking by young men.⁴⁶

Objections to proposals to end, or more tightly regulate, alcohol sponsorship in sport rely on the argument that alcohol sponsorship is crucial for the survival of the sponsored sport. However, professional sport has lost tobacco industry sponsorship in Australia and many other countries and there is no evidence that it has resulted in a decline in sport participation or performance.⁶¹

Professional sports in other cultural contexts have survived without alcohol sponsorships.

In France, the Loi Evian (legislation) restricts alcohol sponsorship of sporting and cultural events, yet the country still has a highly successful sporting culture.⁶² To illustrate the impact of this law, during the French broadcasts of the 2014 World Cup, alcohol advertisements were not permitted to be broadcast on commercial television stations.

Popular support exists for protecting children from alcohol sponsorships.

According to the Foundation for Alcohol Research and Education, results from the Annual Alcohol Poll 2018 show 52% of Australians believe alcohol sponsorship should not be allowed at sporting events.⁴³ Public attitudes toward alcohol sponsorship in community sport have not been tested.

An assessment of the cost effectiveness of potential preventative options, measured against their impact on disability-adjusted life years, found a comprehensive ban on all forms of alcohol advertising was the second most attractive option after volumetric taxation.⁶³ This is due partly to the low cost to government of implementing and maintaining a ban on advertising due to its ease of administration.

This suggests that ending alcohol sponsorship of sport is likely to be cost-effective.

Alcohol sponsorship of sport enables alcohol brands to market to young people in contravention of alcohol marketing codes. Evidence suggests it is successful in increasing brand awareness, brand image, intentions to purchase alcohol and consumption of alcohol among young people and adults alike.

Ending alcohol sponsorship is likely to be an efficient method of reducing alcohol related harm.

Pros and cons

Pros of Reducing Alcohol Sponsorship in Sport

- Reducing and controlling exposure to alcohol marketing is an important element of public health alcohol policy as it is likely to lessen the attraction to alcohol and reduce consumption, especially among young people.
- Eliminating alcohol sponsorship during sports broadcasts would be cost-efficient because it is inexpensive to administer.
- Broadcasters and sporting codes have no difficulty in acquiring non-alcohol sponsors.
- Use of social media platforms by sport sponsoring brands is increasing, is difficult to monitor and supervise, which means much alcohol marketing, including to children, is unregulated.
- There is popular support for protecting children from alcohol sponsorships - quite simply, children should not be exposed to alcohol marketing and promotions.

Cons of Reducing Alcohol Sponsorship in Sport

- Sporting codes, free to air and cable TV networks and other media outlets will stoutly resist ending alcohol sponsorship and will portray their adversaries as anti-sport.
- Public campaigns against alcohol sponsorship may turn attention to its role in community sport and pose challenges for the ADF/Good Sports/community club relationships.

Risks to the **ADF**

- Perceptions of conflicts of interest over alcohol sponsorship for community leagues and clubs, including Good Sports clubs.
- Community sports clubs may be deterred from participating in the Good Sports program if they feel it restricts sponsorship opportunities.

ADF position

1. The ADF supports a ban on alcohol sponsorship in sport, recognising this is a long-term goal, requiring phasing-in to reduce the immediate impact, particularly on community sport.
2. The ending of alcohol sponsorship of sport should be part of a broader strategy to reduce excessive consumption of alcohol policy and legislation changes.
3. Reducing the attraction alcohol has for young people is a major aim of public health.

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