

The Hon Mark Butler MP
Minister for Health and Aged Care
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House of Representatives
Parliament House
Canberra ACT 2600
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25th May 2023

CC: The Hon Michelle Rowland MP, Minister for Communications

RE: Concern about negative impact of alcohol marketing on community health and wellbeing

Dear Minister Butler,

We write to you to raise concerns about the recent release of the revised Alcohol Beverages Advertising Code (ABAC). The ABAC is designed and run by alcohol companies and their lobby groups and no amount of tinkering with the Scheme will ever prioritise the health and wellbeing of our community.

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public's health in Australia and seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

Self-regulation of alcohol marketing by the alcohol and advertising industries has failed to protect young people and the general community. Alcohol marketing has insidiously made its way into every outlet available, from television, streaming service product placement, radio, social media, print media, online video channels, mobile phones, sponsorship of sporting and music events, and outdoor media. Exposure to alcohol advertising influences young people's attitudes about drinking and increases the likelihood that adolescents will start to use alcohol and will drink more if they are already using alcohol.ⁱⁱⁱ Self-regulation of alcohol marketing should be replaced by independent, government-led regulation with sanctions for non-compliance.

This hollow review of the inherently flawed ABAC comes at a time when alcohol induced deaths have increased for the past two yearsⁱⁱⁱ and when alcohol use is the leading cause of premature death and morbidity among young Australians.^{iv} A person is hospitalised because of alcohol every three-and-a-half minutes^v and alcohol-related emergency department injury presentations are highest among Australian teenagers aged 15-19 years old.^{vi}

We need to be doing more to prevent alcohol harms.

There is a wealth of research which shows that the extensive amount of alcohol marketing our children and the wider community are exposed to is causing harm. We know that when children are exposed to alcohol marketing, they are more likely to start drinking alcohol at a younger age and to go on to drink alcohol at higher risk levels later in life.^{vii} We also know that exposure to alcohol marketing increases alcohol cravings and triggers a desire to drink among people who are most at risk of alcohol harm.^{viii}

Despite the clear harms associated with alcohol marketing, there is little regulation of alcohol marketing in Australia. Rather, alcohol companies are largely left to set their own marketing rules through the voluntary ABAC Scheme which has no legislative standing or penalties for non-compliance.

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We are deeply concerned that the Department of Health sits on the ABAC Management Committee alongside alcohol lobby groups. This undermines the principle of protecting public health policies from the influence of vested commercial interests, which is identified in the National Preventative Health Strategy. This would not occur with the regulation of other harmful product marketing, such as tobacco, and should not occur for alcohol.

We strongly support the Australian Government developing a comprehensive legislative framework with enforcement measures that effectively stops harmful alcohol marketing. This must be developed and overseen independently of the alcohol industry. We see the withdrawal of Australian Government representation from the ABAC Management Committee as the crucial first step toward meaningful regulation of alcohol marketing in Australia.

With the increasing rates of alcohol related harm that we are seeing, meaningful action is needed to prevent further harm and to keep people healthy and safe.

We applaud the comprehensive package of reforms in the tobacco and vaping area. We see the urgent need for a similarly comprehensive package of strategies aimed at reducing alcohol related harms in Australia. This issue is one piece among a wider raft of measures necessary to tackling the long-standing health and social problems linked to hazardous and harmful alcohol consumption in Australia.

We welcome the opportunity to discuss this further.

Yours Sincerely,



Adjunct Professor Terry Slevin
Chief Executive Officer
Public Health Association of Australia

ⁱ Jernigan D, Noel J, Landon J, Thornton N, Lobstein T. Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. *Addiction*. 2017;112:7–20.

ⁱⁱ Sargent JD, Babor T. The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs* 2020;113-24.

ⁱⁱⁱ Foundation for Alcohol Research and Education. Alcohol-induced deaths in Australia. Canberra: FARE, 2023.

^{iv} Australian Institute of Health and Welfare. Australian Burden of Disease Study. Impact and causes of illness and death in Australia 2018. Canberra: AIHW, 2021.

^v Lensvelt E, Gilmore W, Liang W, Sherk A, T. C. Estimated alcohol-attributable deaths and hospitalisations in Australia 2004 to 2015. Perth: National Drug Research Institute, Curtin University, 2018.

^{vi} Lensvelt E, Gilmore W, Gordon E, Hobday M, Liang W, Chikritzhs T. National Alcohol Indicators project: Bulletin 14 — Trends in estimated alcohol-related emergency department presentations in Australia, 2005–06 to 2011–12. Perth: NDRI, Curtin University; 2015.

^{vii} Jernigan D, Noel J, Landon J, Thornton N, Lobstein T. Alcohol marketing and youth alcohol consumption: A systematic review of longitudinal studies published since 2008. *Addiction*.

^{viii} Murray R, Leonardi-Bee J, Barker A, Brown O, Langley T. The effect of alcohol marketing on people with, or at risk of, an alcohol problem: A rapid literature review. University of Nottingham & SPECTRUM, 2022.