

Question 1: Policy Approach

8. The proposed approach will be a mandatory policy, with policy development, monitoring and enforcement led by the Government of South Australia.

Do you support, partially support, or not support this policy approach?

Support

Please provide a reason for your answer and consider:

- **opportunities to strengthen policy effectiveness**
- **costs and benefits**
- **barriers and enablers**
- **considerations for policy implementation and monitoring**

PHAA supports the proposed approach of mandatory restrictions of unhealthy food and drink advertising on South Australian government transport assets. Mandatory, government-led regulations on advertising have been shown to be effective in reducing the community's exposure to unhealthy food and drink advertising. Countries with statutory policies have been shown to achieve a significant decrease in junk food sales per capita, which is not seen in countries with only self-regulatory policies [1]. We therefore commend the South Australian government for its intention to implement a mandatory policy.

Consistent with PHAA's policy position statement on Protecting Children from the Marketing of Unhealthy Foods and Beverages [2], PHAA proposes that the Government develop a clear approach to monitoring and enforcement, including the introduction of meaningful sanctions for advertising companies that fail to adhere to the restrictions defined by the policy. Potential models for monitoring and enforcement have been developed in countries that have implemented advertising restrictions, including Chile and the United Kingdom [3].

References

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Question 2: Food and Drink Classification System

The proposed food and drink classification system to be used for this policy is the Council of Australian Government (COAG) Health Council National interim guide to reduce children's exposure to unhealthy food and drink promotion.

Do you support, partially support, or not support using this classification system?

Partially support

Please provide a reason for your answer and consider:

- **opportunities to strengthen policy effectiveness**
- **costs and benefits**
- **barriers and enablers**
- **considerations for policy implementation and monitoring**

PHAA supports the proposed food and drink classification system, including the modification to include alcohol as an unhealthy drink, in line with its status as a discretionary food item. We note that alcohol consumption contributes to 4.5% of the burden of disease in Australia [1] and is causally associated with a range of health issues including liver disease and many cancers [2]. There is clear evidence that exposure to alcohol advertising is associated with alcohol consumption, particularly among young people [3].

In addition, we recommend expanding the classification system to also include zero-alcohol beverages: drinks that resemble alcoholic beverages in taste and appearance but are not classified as alcoholic based on their low alcohol content (in Australia, <0.5% or <1.15% alcohol by volume depending on the policy context [4]). Many of these beverages are produced by parent alcohol companies and share branding and appearance with their alcoholic counterparts [5]. We recommend including both zero-alcohol beverages that share branding with alcohol products and ones with unique branding within the food and drink classification system. With respect to zero-alcohol beverages that feature parent alcohol branding, in jurisdictions where restrictions on alcohol marketing have been introduced without concurrent restrictions on zero-alcohol beverage marketing, such as Ireland, alcohol companies have circumvented these restrictions by advertising zero-alcohol beverages that look nearly identical to their alcoholic counterparts as a form of surrogate marketing [6,7]. The World Health Organization has raised concerns about the potential for zero-alcohol beverages to serve as surrogate marketing, and recommends extending any restrictions on alcohol advertising to include zero-alcohol beverages [8].

The World Health Organization also notes that there is significant uncertainty regarding the effects of zero-alcohol beverages on alcohol consumption and public health [8]. Concerns have been raised that zero-alcohol beverages serve to normalise alcohol consumption, and may promote an interest in alcohol among minors, acting as a gateway towards alcohol initiation [5,8,9]. In addition, there is evidence that zero-alcohol beverages may trigger thoughts and cravings towards alcohol among heavy drinkers and people with alcohol use disorder [10]. Given these concerns, we believe a precautionary approach classifying zero-alcohol beverages as an unhealthy drink is warranted.

References

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Question 3: Master Branding

In line with the Council of Australian Government (COAG) Health Council guide, **master branding** is a specific overarching corporate brand name that serves as the main anchoring point which all underlying product brands are based. The proposed policy specifies that the master brand *should not* be the predominant feature of any advertisement and can only be used when in combination with the image of a healthy food or drink item.

Do you support, partially support, or not support this Master Branding approach?

Partially support

Please provide a reason for your answer and consider:

- **opportunities to strengthen policy effectiveness**

- **costs and benefits**
- **barriers and enablers**
- **considerations for policy implementation and monitoring**

PHAA supports including restrictions on the advertising of master brands within the scope of the policy but advocates for extending this policy to prohibit all advertising featuring master brands used on unhealthy food and drink products. The Discussion Paper notes that excluding brand marketing from the policy scope may lead to an increase in brand marketing from food and beverage brands associated with unhealthy products, which may increase brand recognition and positive associations with the brand, ultimately leading to an increase in consumption of the unhealthy products. PHAA argues that this same risk also applies if master branding is permitted to be used in combination with images of healthy food and drink items. Evidence suggests that young people associate master brands with their well-known unhealthy products even when presented alongside healthy products. For example, exposure to advertisements for 'healthy' fast food options has been shown to promote liking for fast food in general among children [1]. In Thailand, where brand sharing between alcoholic beverages and non-alcoholic beverages such as bottled water are common, research has shown that young people primarily associate these brands with the alcoholic products, despite the country's restrictions on alcohol advertising [2]. The marketing literature on brand extensions shows that a person's associations with brand extension products, developed through exposure to those products and their marketing, influences their attitudes and consumption intentions toward the parent brand [3]. PHAA therefore advocates for brand-level restrictions on advertising of unhealthy food and drink products, following the example of Norway where brand-level restrictions on advertising apply to alcohol brands [4].

References

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Question 4: Scope

The **scope** of this policy only applies to advertising on South Australian government owned transit assets (buses, trams and trains). However, consideration will be given to future opportunities that may strengthen and widen the remit of this policy.

Do you support, partially support, or not support this initial policy scope?

Partially support

Please provide a reason for your answer and consider:

- **opportunities to strengthen policy effectiveness**
- **costs and benefits**
- **barriers and enablers**
- **considerations for policy implementation and monitoring.**

Response

PHAA supports the advertising restrictions being applicable to South Australian government owned transit assets (buses, trams and trains), but also recommends the scope to be extended to include all government assets, consistent with the South Australian Public Health Consortium's 2022 Election Platform [1]. In particular, exposure to unhealthy food and drink advertising at sporting events, including those hosted at venues controlled by the South Australian government, can be substantial [2-4]. While unhealthy food consumption is determined by various social and environmental factors, marketing has always been a highly influential element. PHAA considers the proposed policy as a step in the right direction and would recommend the development of a timeline and process for decision-making about expanding the scope to include all government assets.

PHAA also recommends that the SA Government advocate for the adoption of comprehensive restrictions on all unhealthy food and drink marketing nationally, consistent with PHAA's position statement on Protecting Children from the Marketing of Unhealthy Foods and Beverages [5]. Similar approaches have been successfully adopted in Chile and Quebec, which included a ban on the marketing of unhealthy foods and beverages across all media and settings, including, but not limited to broadcast, online, schools, outdoors, etc. [6].

References

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Do you have any further comments on any other areas of the policy framework?

We thank you for the opportunity to comment on the Restriction of unhealthy food advertising on South Australian Government transport assets. PHAA strongly supports action to restrict the advertising of unhealthy foods, consistent with the South Australian Public Health Consortium Election Platform [1] and PHAA's policy position statement on Protecting Children from the Marketing of Unhealthy Food and Beverages [2]. Unhealthy food advertising can influence children's lifelong food choices and health, ultimately affecting the prevalence of overweight and obesity and associated health conditions. Evidence shows that policy to reduce the exposure of marketing of energy-dense nutrient-poor foods to children is a cost-effective strategy to address childhood overweight and obesity [3,4], and we commend the Government for its plans to act.

References

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