

Submission to the Community Affairs Committee

Alcohol Toll Reduction Bill 2007

Aims of the Bill

- Require health information labels on all alcohol products
- *Restrict TV and radio alcohol **advertising** to after 9pm and before 5am to stop alcohol being **marketed** to young people*
- *Require all **alcohol ads** to be pre-approved by a government body comprising an expert from the medical profession, alcohol and drug support sector, accident trauma support sector and the alcohol industry*
- *Ban **alcohol ads** which are aimed at children or which link drinking to personal, business, social, sporting, sexual or other success*

Three out of the four aims of the Bill concern the responsible and appropriate use of marketing and advertising with respect to the alcohol industry. Unfortunately, based on the material currently available there appears to be a fundamental flaw in the proposed processes to be employed in achieving these aims.

The requirement that all alcohol advertisements be pre-approved by a government body has its merits however the proposed composition of the Committee does not reflect the expertise required to arrive at an *informed* opinion or make an *informed* decision regarding marketing and advertising matters. Specifically, the proposed composition of the expert committee does not explicitly include representatives of the marketing or advertising professions who have expert knowledge in terms of how different communications strategies and marketing approaches are likely to impact on the consumer behaviour of different target markets.

The focus of the proposed Committee composition is on professionals who deal with the adverse *outcomes* of inappropriate alcohol consumption and does not explicitly include those who have expertise on one of the key *input* channels into consumption choices ie marketing and advertising (representatives of the alcohol industry are not necessarily qualified marketers). While advertising is a powerful communication tool, its relative impact on different target markets varies based on a range of strategic and technical issues which are not necessarily fully understood by those whose technical expertise lies in other disciplinary fields such as health.

Impacts of alcohol advertising have been studied by marketing and advertising academics and professionals for many years. In particular there has been a strong focus in the social marketing field on minimizing the potential adverse impacts of alcohol consumption amongst youth. Research includes a combination of the impacts on youth and society of alcohol advertising for commercial benefit as well as social marketing campaigns designed to minimize excessive alcohol consumption.

While there are reports and papers available world wide addressing the linkages between advertising and alcohol consumption these are post hoc and reactive reports on the impacts of advertising already undertaken. To validly extrapolate these findings into alternative national and social contexts, and to predict the likely impact of proposed advertising messages, requires an *expert* rather than lay or *intuitive* understanding of marketing processes.

Marketers and advertisers rarely claim expertise in the content area of the industries that employ them although all would engage in generalist reading and research into such industries. In the same way the reading of reports which, by their public nature have had most of the technical material omitted or rephrased in lay terms, means that a Committee of the current proposed expert composition is unlikely to fully understand the complex underpinning relationships involved in effective marketing and advertising practice.

Assuming that the Bill is ultimately passed in its current or similar format, and that the government proceeds with its proposal to increase scrutiny of alcohol advertising, I would like to suggest that the Community Affairs Committee reconsider the proposed composition of any screening body to explicitly include expertise from the marketing and advertising professions.

A handwritten signature in cursive script that reads "Susan Dann".

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