



## By Email

The Secretary  
Senate Standing Committee on Community Affairs  
Parliament House Canberra ACT 2600  
[community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

20 March 2008

The Internet Industry Association (IIA) appreciates the opportunity of making the following submissions in relation to the Alcohol Reduction Bill ("the Bill") 2007.

The IIA is Australia's national Internet industry organisation. Members include telecommunications carriers, content creators and publishers, web developers, e-commerce traders and solutions providers, hardware vendors, systems integrators, banks, insurance underwriters, technology law firms, ISPs, educational institutions, research analysts, and those providing professional and technical support services. Increasingly, our members also include businesses hoping to establish an effective online presence for the purposes of e-commerce.

On behalf of its members, the IIA provides policy input to government and advocacy on a range of business and regulatory issues, to promote laws and initiatives which enhance access, equity, reliability and growth of the medium within Australia.

We have a substantial and ongoing track record in promoting end user protection as evidenced by our industry codes of practice in relation to content regulation, online gambling and spam. These are all accessible from our website at [www.ii.net.au](http://www.ii.net.au).

In relation to the terms of reference in the present case, we submit as follows:

- while appreciating the underlying concerns informing the Bill, the IIA is concerned about the possible extension of the Bill's effect to include website publishers, especially as the efficacy of the Bill relies on the ability of ACMA to meaningfully enforce the regime, both within Australia and internationally.
- any time restrictions or age verification measures on display of alcohol related advertising would be unworkable in the internet context unless they could be extended globally and enforced extraterritorially; in the context of there being in excess of 8 billion pages of web content, innumerable blogs (many of which are sponsored) and the mass creation and publication of video content every minute, this would not be a trivial undertaking;

- any extension of the regime to include website publishers would significantly disadvantage Australian website publishers over international website publishers, as presumably the regime could only have effect on websites published and hosted within Australia;
- as a matter of principle, regulation of the internet must take into account its fundamental nature – ubiquity, diffusion, lack of central or geographic control and its instantaneity.

The IIA would welcome the opportunity to provide further advice on these matters should the Bill be extended to include online publishers.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'P. Coroneos', with a stylized flourish at the end.

Peter Coroneos  
Chief Executive