

Alcohol advertising and promotions in Victoria: Action needed by the Victorian Government

Summary

- Alcohol can be advertised in Victoria with little restriction despite the widespread and substantial harm it causes.
- Children and young people are exposed to a huge volume of alcohol advertising, and are highly susceptible to its effects.
- Young people's exposure to alcohol advertising increases the likelihood they will start drinking at a younger age, and drink more heavily and frequently.
- There is a high level of community support for regulating alcohol advertising, and the World Health Organization and other expert groups have recommended advertising regulation as an effective alcohol harm-reduction strategy.
- The Victorian Government has the power and remit to regulate outdoor alcohol advertising, and promotions by liquor licensees, in Victoria.
- Outdoor alcohol advertising is widespread in Victoria, and children and young people cannot avoid being exposed to this advertising in their daily activities. There are no effective restrictions of outdoor alcohol advertising in Victoria.
- Promotions by liquor licensees, such as bulk purchase or 'multi-buy' discounts, excessive price discounts, gifts with purchase and supermarket shop-a-dockets, are also widespread. These promotions often focus on price discounts or create incentives to purchase larger volumes of alcohol, and are likely to appeal to young people. Research shows these promotions are likely to affect young people's alcohol consumption.

Summary of recommendations

The Victorian Government should:

- Prevent outdoor alcohol advertising on all public transport infrastructure, and within a 700 metre radius of schools.
- Directly prohibit liquor licensees from irresponsibly advertising or promoting their business or products, including through excessive price discounts, bulk purchase discounts, shop-a-docket promotions and gifts with purchase.

Alcohol advertising and harm in Victoria

Alcohol is a hazardous substance, which causes widespread and devastating harms to Victorian children, families and communities, and kills around 1200 Victorians per year.¹ The negative health and social consequences of alcohol in Victoria are significant and increasing. Over past years, there have been substantial increases in a range of alcohol-related harms, including alcohol-related family violence, assaults, ambulance attendances and treatment episodes.²

Despite this, alcohol advertisers are able to promote and glamorise their products in Victoria with little restriction. Alcohol is advertised heavily through a variety of channels, including outdoor media, digital media, television, print, radio, sports sponsorship and point-of-sale advertising. Children and adolescents are exposed to huge volumes of this advertising.³

Effects of alcohol advertising on young people

Young people are highly susceptible to alcohol advertising, and to harm from drinking. Systematic reviews of the evidence (including a 2016 systematic review) have consistently concluded that young people's exposure to alcohol advertising increases the likelihood that they will start drinking, or drink more frequently and heavily if they already drink.⁴ Children and adolescents are more susceptible to advertising strategies than adults, and their exposure to alcohol advertising is likely to have a cumulative effect.⁵

The National Health and Medical Research Council recommends that "not drinking is the safest option for minors" based on a range of risks from alcohol, including interference with brain development, and contribution to accidental death and risk-taking behaviour.⁶

Although there has been a recent much needed decline in youth drinking, levels of consumption and risky drinking among young Australians are still unacceptably high. The 2014 Australian Secondary Schools Alcohol and Drug Survey reported that almost 15 per cent of 12-17 year olds were current drinkers, 25 per cent had consumed alcohol in the past month, and 45 per cent had drunk in the past year. Seventeen per cent of 17 year olds had drunk at least 5 drinks on one day in the past week.⁷

Comprehensive strategies, including effective regulation of alcohol advertising, are needed to drive up the age at which young people start drinking and reduce risky drinking among adolescents.⁸ Effective regulation is also needed to prevent alcohol advertising from countering any further decline in youth drinking.

Support for restricting young people's exposure to alcohol advertising

There is a high level of community support for restricting alcohol advertising in Victoria. A 2010 VicHealth survey found that:

- 82 per cent of respondents agreed that alcohol advertisements should be restricted so that they are less likely to be seen by people under 18, and
- 77 per cent of respondents agreed that alcohol advertising on billboards should be banned within one kilometre of schools.⁹

Expert groups including the World Health Organization (WHO), the National Preventative Health Taskforce and the Australian Medical Association have recommended restricting alcohol advertising at times and in places where children and young people's exposure is high.¹⁰ The WHO Global Strategy to Reduce the Harmful Use of Alcohol recommends that 'reducing the impact of marketing, particularly on young people and adolescents, is an important consideration in reducing harmful use of alcohol.'¹¹

This position statement focuses on two categories of alcohol advertising that are clearly within the power and remit of the Victorian Government to regulate:

- Outdoor alcohol advertising in Victoria; and
- Liquor licensee promotions in Victoria.

Outdoor alcohol advertising

Outdoor alcohol advertising is ubiquitous in Victoria, and children and young people are unable to escape it.

In 2015, Australian alcohol advertisers spent \$26.9 million on outdoor advertising, which amounted to 36 per cent of the total spend on alcohol advertising (an increase from 21 per cent in 2005). The alcohol industry is among the top ten spenders on outdoor advertising in Australia – well above the gambling industry, which ranked 19 in 2015.¹²

Children and young people cannot avoid being exposed to outdoor alcohol advertising in day-to-day activities, and parents cannot control their exposure. Young people are particularly likely to be exposed to outdoor alcohol advertising because they are frequent public transport users.¹³ A 2011 Commonwealth House of Representatives Standing Committee inquiry into outdoor advertising noted that it “... is visible to all audiences and cannot be avoided.”¹⁴

Research indicates that outdoor advertising affects the drinking behaviour of young people. A recent Cancer Council Victoria study found that exposure of young people aged 12-17 years to alcohol advertising via billboards, newspapers, or magazines was significantly associated with them consuming alcohol in the past month and at risky levels.¹⁵ A 2008 systematic review of research on the effects of alcohol pricing and promotion concluded that there is consistent evidence to suggest that exposure to outdoor advertising may increase the likelihood that young people will start to drink, the amount they drink, and the amount they drink on any one occasion.¹⁶

Policy environment

There are currently no effective restrictions in Victoria on outdoor advertising in places where children and young people are often present, such as on public transport, public transport hubs and near schools.

The Outdoor Media Association’s self-regulatory guidelines state that its members should limit alcohol advertising on fixed signs within a 150 metre sight line of the gates of a primary or secondary school. There are a number of problems with this guideline:

1. The guideline does not apply to advertising on alcohol outlets near schools, or advertising on public transport.¹⁷
2. The guideline does not apply to advertising of alcohol retailers, provided the advertising is restricted to information about the retailer, and the brand name, type, price and photographs of alcohol products.¹⁸ This would exclude much packaged liquor advertising, which focuses on alcohol price and discounts.
3. The 150 metre restriction is far too short. Children are exposed to advertising well beyond this distance in their daily travels to and from school. Data from the Victorian Walk to School program indicates that Victorian school children travel an average of 700 metres to school.¹⁹ Other research indicates that Victorian children travel median distances of further than 1km to school in urban areas, and further than 2km in rural areas.²⁰
4. There is no monitoring of outdoor alcohol advertising near schools, and no penalties for breaching the 150 metre rule. It appears that the rule is largely ignored. There have been examples of outdoor alcohol advertising placed directly opposite schools in breach of the guidelines.²¹ In three very recent examples in Melbourne, a Tiger Beer advertisement was displayed on a tram shelter opposite a primary school, a Tipple alcohol delivery and large mural of Shane Warne drinking beer was displayed

directly opposite another primary school, and a Smirnoff Vodka advertisement was displayed on a bus shelter directly opposite a secondary school (see attached images).

The 2011 House of Representatives Standing Committee inquiry concluded that loopholes in the guidelines make them 'little more than a token gesture' and recommended limiting outdoor alcohol advertising given its exposure to children.²²

The South Australian and Australian Capital Territory Governments have recently restricted alcohol advertising on public transport services, and the Western Australian Government has pledged to do this. The Victorian Government should follow the lead of these states and take action to limit young people's exposure to outdoor alcohol advertising.

It is clear that the State Government has the power to legislate to restrict advertising in public spaces in Victoria. This is the area over which the State Government has the greatest control and is better placed than the Commonwealth to legislate because the Commonwealth's legislative authority is limited to certain specific powers.

There is also scope for the State and local governments to restrict outdoor alcohol advertising without legislating. The State Government and local governments have significant scope to control advertising on publicly owned or controlled assets, such as public transport, public land and publicly owned sporting facilities. The State Government could restrict alcohol advertising under leasing, franchising and advertising contracts. Local governments could also restrict alcohol advertising by placing conditions on activities in public spaces or on public assets, and on leasing and permit arrangements.

Liquor licensee promotions

Many liquor licensees in Victoria compete aggressively on product pricing, and promote extreme price discounting of alcohol products through a range of advertising channels. Liquor licensees also frequently use point-of-sale promotions, such as happy hours, competitions, discounts and give-aways, which may encourage excessive consumption of alcohol and appeal to children and young people. These promotions often centre on discounted price, or incentivise the purchase of large volumes of alcohol. There is an inverse relationship between the price of alcohol and levels of consumption and harms.²³

A common point-of-sale promotion is price discounts for bulk purchases or 'multi-buy' discounts (such as two four-packs of Vodka Cruiser for \$28 or three four-packs of Vodka Cruiser for \$36²⁴), which are highly effective in encouraging the purchase of increased volumes of alcohol.²⁵ Another common promotion is free gifts and branded merchandise with purchase, which often have strong appeal to children (such as hats, free soccer balls,²⁶ and lip gloss²⁷). Licensees also frequently use 'shop-a-docket' promotions, which advertise free or discounted alcohol products on supermarket receipts for purchases of general supermarket items.²⁸ These promotions reach supermarket shoppers, including minors, who may not have set out to buy alcohol, and direct them to heavily discounted alcohol in packaged liquor outlets.

Australian research has found that point-of-sale promotions are widespread, with one recent study finding that liquor outlets in Sydney and Perth metropolitan areas had an average of 17.3 promotions each.²⁹ The study found that point-of-sale promotions, such as competitions and gift with purchase, almost always required the purchase of a significant number of standard drinks to participate (just under 19 per promotion), providing incentives to increase the amount purchased or consumed on a single occasion.³⁰

A systematic review of research on the effects of alcohol pricing and promotion concluded that point-of-sale promotions are likely to affect overall consumption of underage drinkers, binge drinkers and regular drinkers.³¹ Research indicates that point-of-sale promotions involving price or volume discounts are likely to have a strong impact on young people and to encourage them to buy increased volumes of alcohol. An Australian study of 18-25 year olds found that most subjects had high recall of previous in-store promotions and were influenced by the promotion to buy more of a certain brand of alcohol.³²

Recent Victorian research shows that promotions featuring alcohol branded merchandise are likely to affect the drinking behaviour of young people. The research, conducted by Cancer Council Victoria, found that ownership of alcohol branded merchandise by Victorian students aged 12-17 years was significantly associated with consuming alcohol in the past month and at risky levels.³³

The NSW Office for Liquor Gaming and Racing conducted a six month investigation into shop-a-docket promotions, concluding that they were “likely to encourage the misuse and abuse of liquor”, and recommending to the Director General of the NSW Department of Trade and Investment that they be banned.³⁴

Policy environment

In Victoria, section 115A of the *Liquor Control Reform Act 1998* (Vic) (LCRA) currently regulates advertising and promotions by licensees.

Under section 115A, the Victorian Commission for Gambling and Liquor Regulation (VCGLR) has the power to ban irresponsible alcohol promotion or advertising by a licensee.³⁵ The VCGLR has published guidelines that set out 16 principles for the responsible advertising and promotion of alcohol.³⁶

However, the LCRA and the VCGLR’s guidelines do not effectively regulate alcohol discounting and promotions in Victoria. The guidelines focus on promotional activities in on-premises outlets, and do not adequately address promotions by packaged liquor outlets, particularly discount promotions and point-of-sale promotions. In addition, section 115A of the LCRA does not impose a direct obligation on licensees to ensure that advertising and promotions are responsible. This means that a licensee can advertise irresponsibly without breaching the LCRA, unless and until the VCGLR issues a section 115A banning notice. If the VCGLR becomes aware of conduct that it assesses to breach the guidelines, its guidelines state that it will first request that the promotion be withdrawn before issuing a formal section 115A banning notice.³⁷ This means that licensees can engage in irresponsible promotional activity without risk of sanction, unless the licensee first refuses the Commission’s request to withdraw a promotion and then refuses to comply with a banning notice issued by the Commission.

There are more than 21,000 licences operating in Victoria.³⁸ However, according to the VCGLR’s website, it has not yet taken action to ban any irresponsible promotions in 2016/2017; and it banned only two irresponsible promotions in 2015, and three in 2014. The VCGLR has taken action to ban only 27 promotions since 2009, and all but one have been on-premises promotions.³⁹ The failure of the VCGLR’s guidelines and enforcement activities to address packaged liquor promotions is concerning, given that around 80 per cent of alcohol consumed in Australia is packaged liquor.⁴⁰

There is a clear need for reform of the LCRA to impose a direct obligation on licensees not to engage in irresponsible promotions. The LCRA should regulate on-premises and packaged liquor promotions with equal weight, and should specifically prohibit promotions

that are likely to encourage excessive or rapid consumption of alcohol, create incentives to buy and consume larger quantities of alcohol than intended, or that are likely to target or appeal to minors. These should include promotion of excessive price discounts, bulk purchase or 'multi-buy' discounts, competitions and game of chance promotions, gifts with purchase, shop-a-dockets, drinking games, non-standard drink sizes and happy hours.

Recommendations

1. The Victorian Government should take action to prevent outdoor alcohol advertising on all public transport infrastructure, and within a 700 metre radius of schools (based on the average distance that Victorian children walk to school). This could be achieved through legislation or under government contracts governing publicly owned or controlled assets and land.
2. The LCRA should impose a direct obligation on on-premises and off-premises licensees to not advertise or promote their business or products in a way that:
 - may encourage irresponsible consumption of alcohol,
 - may appeal to minors, or
 - is otherwise not in the public interest.
3. The LCRA should set out a non-exhaustive list of the type of advertisements and promotions that would be considered to promote irresponsible consumption of alcohol. The list should apply to promotions by on-premises and off-premises licensees, and should include the following types of promotions:
 - Bulk purchase or 'multi-buy' discounts (e.g. 'two for \$20'), where a discount is offered if consumers buy a larger quantity of alcohol.
 - Excessive price discounts.
 - Shop-a-docket promotions.
 - Gifts with purchase.
 - Competition and game of chance promotions.
 - Incentives to consume alcohol rapidly or excessively, such as drinking games and challenges.
 - Non-standard drink sizes.
 - Happy hours.

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Examples of outdoor advertising near Victorian schools, March-May 2017



Tiger beer advertisement opposite Wesley College Junior School, St Kilda Rd Campus, May 2017



Tipple late night alcohol home delivery service advertisement opposite Fairfield Primary School, March 2017

Examples of outdoor advertising near Victorian schools, March-May 2017



Tipple 60 minute alcohol delivery service advertisement directly opposite St Kilda Primary School gates, March 2017



Smirnoff vodka advertisement on bus shelter opposite Wesley College Secondary School, St Kilda Rd campus, March 2017

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