

National Drug Strategy Consultation
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AANA Submission: Australia's National Drug Strategy Beyond 2009

The Australian Association of National Advertisers (AANA) welcomes the opportunity to provide comment on the above consultation document. AANA also acknowledges the challenges of developing a strategy to address the complexity of the issues relating to community health concerns.

AANA, as the peak industry representative body for over 80 years, is proud of its achievements in proactively responding to Australian and international community and government concerns by adopting and implementing better practice and self-regulatory measures to meet community expectations in relation to a range of issues.

AANA shares the concern of the Australian government in relation to the impact of the inappropriate consumption of alcohol on the health of individuals and to the socioeconomic future of the whole of Australia. However, it must be recognised that there is no evidence that advertising contributes significantly to the problem of alcohol misuse and that per capita consumption of alcohol has in fact fallen in Australia before stabilizing in recent years. This trend has occurred during times of significant marketing communications by alcohol brand owners.

AANA recommends that a future National Drug Strategy recognises the support given by the Commonwealth and other State/Territory governments for industry initiatives aimed to improve the responsible consumption of alcohol through changes to advertising practice. AANA strongly believes that industry initiatives can make, and are making, a contribution to behavioural change.

AANA supports a strategic direction of shared responsibility recognising that public and private sectors as well as individuals have a role to play promoting improved health and wellbeing.

AANA also highlights the role of self-regulation in the policy and regulatory mix. In addition to sectoral co-regulation through the Alcohol Beverages Advertising Code (ABAC) and Complaints Management Scheme, AANA also promotes responsible advertising practice through our:

- *Code of Ethics*; and
- *Advertising & Marketing Communications to Children Code* effective 2007, revised after extensive consultation in May 2008 and which also includes an amended provision to more comprehensively ban any alcohol-related references in advertising to children..

It is notable that the Advertising Standards Bureau (ABS), which administers the adjudicative procedures for the AANA codes, recorded 6% of complaints received related to alcohol advertising;

note not all complaints received are upheld¹.

This demonstrates that the community is willing to avail itself of this industry funded mechanism for resolving complaints, which withdraws ads where appropriate, delivers speedy consideration of matters, and provides valuable community feedback to the advertising industry on the acceptability (or not) of product advertising executions.

Given the central role of advertisers in developing and promoting responsible advertising practice, AANA recommends that a future National Drug Strategy must:

- be coordinated and integrated in approach – including close consideration of national health policy developments such as the Preventative Health Strategy but also state and territory developments. AANA would be concerned with the development of divergent (and potentially conflicting) strategies across the country as it considers this would be to the detriment of industry, government as well as the community.
- incorporate alcohol industry representation on relevant committees. This recognises the role of, and strengthen partnerships with industry in contributing to delivery of the strategy. It also acknowledges that in the case of alcohol, there is also a legitimate alcohol product industry and safe – and indeed beneficial - consumption levels for the Australian public.
- incorporate the building of the evidence base to support policy action. AANA notes the current equivocal nature of current research into the link between advertising and alcohol consumption. High-level evidence is fundamental to ensuring the right mix of policy actions are developed and implemented to meet the aims of the strategy.
- Include publicly available performance measures. AANA believes that individual policy actions can only be appropriately and effectively assessed if the contribution (and limits) of each influencing factor is articulated. Consumer health and healthcare expenditure issues can only be addressed based on good evidence, including consideration of achievements against performance measures. Performance measures are also integral to meeting best practice regulation principles and best practice policy development.

Yours sincerely



Scott McClellan
Chief Executive Officer

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¹ 2008 complaint statistics from the Advertising Standards Bureau. <http://www.adstandards.com.au/pages/page20.asp>