



28 April 2014

Mr Graham Lowe ONZM, QSM

Chair, Ministerial Forum on Alcohol Advertising and Sponsorship

alcoholadvertisingforum@moh.govt.nz

Re: Submission to the Ministerial Forum on Alcohol Advertising and Sponsorship

1. The Salvation Army has extensive, longstanding and current experience as an alcohol and other drug (AOD) treatment programme provider via our Addictions Service. We currently offer the provision of a wide range of AOD treatment interventions nationally comprising; residential, intensive day programmes, out-patient counselling, AOD Treatment Court, respite services and an intensive day programme in a prison setting.
2. We submit that the Law Commission existing work in this space is comprehensive and should be supported. We contend that the provisions within the Law Commission's Report *Alcohol in Our Lives: Curbing the Harm* around alcohol advertising and sponsorship should form the foundation of any government and community action in response to these alcohol related harm issues.
3. On this occasion, The Salvation Army has elected not to complete the submission form provided. Rather we make the following comments and recommendations for your consideration through this letter.
4. This letter has been prepared by Salvation Army Addictions Services staff members, with some assistance from The Salvation Army's Social Policy and Parliamentary Unit (SPPU). Therefore, the views expressed here reflect the views and approaches of key parts of The Salvation Army working with alcohol related harm in our nation. This letter has been submitted by SPPU on behalf of The Salvation Army.
5. The evidence gathered in 2010 concluded that exposure of young people to alcohol marketing speeds up the onset of drinking and increases the amount consumed by those already drinking. Also in 2010 following its review of our alcohol laws, the Law Commission concluded *that having considered the recent research linking the advertising of alcohol and increased alcohol consumption by young people, and having heard the views of submitters and those consulted, greater controls are needed on advertising, sponsorship and other promotion of alcohol. These controls are in terms of the content of advertising, the levels of exposure to advertising and*

sponsorship messages, and inappropriate sales promotions. There is a strong argument that a self-regulatory body for alcohol advertising is inappropriate.

6. We note that 2,281 out of 2,939 submissions to the Law Commission commented on the range of policy options presented on alcohol advertising and marketing. Of the 2,281 submissions 86% supported banning or restricting all advertising of all alcohol in all media. We believe that more recent evidence that will be presented to you during the course of this review that will only add weight to the Law Commission's findings and recommendations.
7. We also note that Stage 1 of the Law Commission's recommendations has already been implemented by the inclusion of a new clause making it an offence to promote the excessive consumption of alcohol in the *Sale and Supply of Alcohol Act 2012*. However, we are unaware of any test cases based on this new law. We recommend that the Review Forum consider mechanisms to monitor the impact and effect of this legislation.
8. It has now been four years since the Law Commission's recommendations were made. In this time New Zealanders young and old have been continuously exposed to the harmful effects of alcohol advertising and sponsorship. This is no time for further review; rather it is time to act. We recommend that the Review Forum support the immediate implementation of Stage 2 and 3 of the Law Commission recommendations on alcohol advertising and sponsorship as set out in their report *Alcohol in Our Lives - Curbing the Harm 2010*.¹ These being:
 - Stage 2: An interdepartmental committee to consider adopting legislated measures designed to reduce exposure, particularly of young people.
 - Stage 3: This stage would implement restrictions including:
 - Messages and images may refer only to the qualities of products, such as origin, composition, means of production and patterns of consumption;
 - The banning of images of drinkers or the depiction of a drinking atmosphere;
 - Only allowing advertising in press with a majority readership over 20 years of age;
 - No alcohol-related sponsorship of any cultural or sports events or activities. We understand that this means a ban on all forms of alcohol advertising and sponsorship in all media, other than objective product information.

¹ Law Commission (2010). *Alcohol in our lives: Curbing the harm. A report on the review of the regulatory framework for the sale and supply of liquor*. Report 114. Wellington: New Zealand.

9. We recommend that any permitted alcohol advertising is accompanied by health advisory messages developed by public health experts. At the recent Global Alcohol Policy Conference in Seoul Korea, internationally renowned alcohol policy researcher Professor Thomas Babor told delegates that self-regulation of advertising by those with a vested interest has shown to be “*spectacularly ineffective*”.

We wholeheartedly agree. It serves no purpose but to maintain the unacceptable status quo and delay effective measures to curb the harm alcohol-advertising is shown to contribute to.

We recommend that the Review Forum ensure that self-regulation of alcohol advertising and sponsorship in New Zealand is ceased immediately.

10. We consider that there are practical ways in which much of the existing alcohol advertising and sponsorship activities could be limited. These include:

- The establishment of an independent body to take over the management and regulation of alcohol advertising and sponsorship, and ending self-regulation
- Setting out what is alcohol advertising is allowed (i.e. objective product information only), and ban all other advertising. This would apply to ALL broadcast, bill-board and outdoor advertising, all print media, and all website and social media content that is generated by New Zealand based companies/individuals.
- New Zealand companies/individuals are prohibited for promoting or contributing to any overseas based promotions in New Zealand.
- A fund is established from alcohol excise tax to support alternative funding options for alcohol sponsorship, and this is phased out over the next 1-2 years.

11. We acknowledge that this Forum is ideally seeking new evidence that has emerged in recent years. We submit that many groups will offer a plethora of research projects and reports in response to this. However, as aforementioned, we submit it is critical to enact and embrace the good work that has *already* been done by the Law Commission and ensure any future actions are in line with the Commission’s recommendations.

12. The Salvation Army has an on-going relationship and MOU with Otago University. We are now undertaking a joint project where Otago University is reviewing all components of our Addictions Services across the country. This project is in its very early stages and so we have opted to not include any findings around alcohol advertising in this letter to the Forum. But we believe that in the future, this research project will greatly benefit The Salvation Army’s addictions work, and also inform debate, discussion and action around alcohol law reform.

13. In conclusion, we humbly submit that this matter has been discussed and reviewed thoroughly already. The evidence available is strong enough to warrant immediate action, and there is strong public support for reducing the exposure of all New Zealanders to alcohol advertising in all of its forms.

We strongly urge the Forum to recommend an action plan which will implement the Law Commission's recommendations as put forward in their report in 2010. In particular our children and young people need to be protected from the negative impacts that alcohol advertising and sponsorship have on their lives. Your role must be one of creating an environment that promotes healthy choices, and not one where choices are influenced by the needs of the alcohol industry.

For more information, please contact Rhonda Robertson:

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Please note that we wish to appear before the Forum if any public submissions are permitted. Thank you for the opportunity to respond to this review.