

17 July 2007

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

Dear Sir/Madam

RE: Applications for authorisation A91054 and A91055 lodged by the Distilled Spirits Industry Council of Australia Inc and others – interested party consultation

Thank you for the opportunity to provide a comment to the Australian Competition and Consumer Commission (ACCC) in relation to the above applications.

I am very pleased to enclose a comment from VicHealth - the Victorian Health Promotion Foundation, for consideration by the ACCC.

For all enquiries relating to these comments, please contact Brian Vandenberg, Senior Program Advisor, Tobacco Control and Alcohol Harm Reduction Unit at VicHealth (tel 9667 1315 or email bvandenberg@vichealth.vic.gov.au).

I look forward to the outcomes of the ACCC's consideration of these applications.

Yours sincerely

A handwritten signature in cursive script that reads "Harper".

Todd Harper
Chief Executive Officer

VicHealth

Submission to the Australian Competition and Consumer Commission in relation to applications for authorisation A91054 and A91055 lodged by the Distilled Spirits Industry Council of Australia Inc and others

July 2007

1. Introduction

- 1.1 VicHealth supports better regulation and enforcement of standards relating to the advertising, naming and packaging of alcohol products in Australia in the interests of preventing and reducing alcohol related harm (i.e. in the interests of protecting public health and safety).
- 1.2 VicHealth supports the *concept* of introducing a scheme to regulate the naming and packaging of alcohol products in Australia. However, VicHealth has significant reservations regarding the specific scheme proposed by the Distilled Spirits Industry Council of Australia Inc and others in applications A91054 and A91055.
- 1.3 VicHealth's chief concern is that the proposed 'retailer alert scheme' is to be built upon the existing Australian Beverages Advertising Code (ABAC) scheme. VicHealth considers ABAC to be of only limited effectiveness in regulating alcohol advertising in Australia, and this view is supported by evidence.
- 1.4 VicHealth acknowledges that the ACCC is seeking comments on the applications A91054 and A91055 rather than wider matters, such as alcohol advertising and the ABAC scheme more generally. However, VicHealth wishes to respectfully submit some comments in relation to alcohol advertising and the ABAC scheme more generally because, importantly, these matters do relate to the proposed 'retailer alert scheme' under consideration by the ACCC.
- 1.5 Notwithstanding VicHealth's concerns regarding both the ABAC scheme and the proposed 'retailer alert scheme', VicHealth does offer some support for some aspects of the proposed 'retailer alert scheme', and these are detailed further below.

2. Comments on the effect on competition of the proposed 'retailer alert scheme'

- 2.1 It is VicHealth's view that there will be no detrimental effect on competition from the proposed 'retailer alert scheme'.

3. Comments about the nature and extent of alcohol advertising, naming and packaging in Australia

- 3.1 Alcohol marketing and promotions are a major driver of our drinking cultures, influencing our beliefs and attitudes towards alcohol and how we consume it.
- 3.2 Alcohol marketing and promotions are highly pervasive in Australia today, taking many forms. These include, but are not limited to, paid advertising (i.e. through electronic and print media) to promote alcohol products and retailers, promotions by licensed premises, event sponsorship, the sponsorship of sporting clubs, in-store promotions, and product design including the packaging and naming of alcohol beverages in the market place.
- 3.3 It is estimated that the alcohol beverage industries spend at least \$130 million every year on paid advertising to promote their products to Australians (Ad News 2006). In 1995, alcohol advertising expenditure was considerably less, at just \$56 million. Spending on advertising by the alcohol industry is continuing to increase, currently growing at around 11 per cent each year.
- 3.4 Clearly, the alcohol beverage industries understand that more advertising means more sales. But this ultimately leads to more alcohol consumption by those who are most influenced by advertising, and in turn a greater risk of hazardous drinking among these groups, especially young people.
- 3.5 Although the alcohol industry have adopted a self-regulatory approach to alcohol advertising (the ABAC scheme) that discourages advertising which has ‘strong or evident appeal to children or adolescents’, recent research shows that a substantial amount of alcohol advertising is communicated to young people. For example, some advertisements for alcoholic beverages screened on television in metropolitan Melbourne were found to be more likely to reach 13 to 17 year olds than adults. These include*:

Product	Total Annual Spend	Frequency of ads	Relative exposure (of 13-17 years olds Vs 18-29 year olds)
Heineken Lager	\$ 94,000	110	1.12
Cougar Bourbon	\$ 45,000	103	1.04
Archers Spri Schnapps	\$ 57,000	110	1.04
Bundaberg Rum Dry & Lime Mix	\$ 36,000	88	1.06
Orlando Jacobs Creek Sparkling Rose	\$ 89,000	34	1.11

* Advertising on metro Melbourne television, year to March 2005
 Source: King, Taylor, and Carroll (2005a)

- 3.6 It is concerning to note that this has occurred even though the ABAC scheme seeks to restrict advertising that may have ‘strong or evident appeal to children

or adolescents appeal to young people'. However, it is not surprising that a substantial amount of alcohol advertising is of appeal to young people, especially advertising relating to pre-mixed spirits/ready-to-drink beverages (RTDs). In Australia, there are an increasing number of RTDs available in the market place, many of which appear to be designed (including flavouring, colouring, packaging and naming) in ways that appeal to young people. A report released by the Australian Bureau of Statistics last month showed that RTDs are the only alcohol beverage category showing strong growth in consumption in recent years (ABS 2007). While overall per person consumption of alcohol by persons aged 15+ years increased only slightly (0.1%) between 2004-05 and 2005-06, consumption of RTDs grew by 9.0%. Recent research into the alcohol beverage preferences of Victorian secondary school students who do drink has revealed that RTDs are by far their most preferred type of alcohol beverage (White 2006). The research also found that pre-mixed spirits are the preferred products among the heaviest drinkers aged under 18 years.

- 3.7 This finding is supported by other Australian research that found the palatability of some RTDs to be highly appealing to the taste preferences of young people (Copeland et al 2005). This research also found that 12 to 17 year-olds could not taste the difference between some RTDs and non-alcohol beverages (e.g. chocolate milk containing vodka and normal chocolate milk). The research also pointed to other studies that found RTDs are packaged in containers that are similar in appearance to highly popular soft drinks that appeal to young people (MacKintosh et al 1997). MacKintosh et al. (1997) also highlight the issue of RTD package size, and suggest that RTD containers are usually small and portable; thus enabling easier concealment and under age drinking. An Australian study (Smith et al 2005) has highlighted similar concerns regarding RTD packaging. It found that alcohol retail staff generally agreed that RTDs were designed for under age drinkers and often termed "kiddie drinks". The research by Copeland et al (2005) found that there is some truth to the hypothesis that alcohol beverage packaging does increase palatability ratings of alcohol products to young people (Copeland et al 2005 p.141).
- 3.8 In light of the above, DSICA's proposal to the ACCC rightly states that 'naming and packaging alcohol beverages may influence consumers' drinking decisions and the way in which a beverage is consumed' (p. 1).

4. Comments about the existing ABAC scheme

- 4.1 VicHealth disputes the statement in DSICA's proposal to the ACCC that 'the effectiveness of the alcohol advertising pre-vetting system (AAPS) is illustrated by the fact that ... of the 761 advertisements pre-vetted, only 29 advertisements received complaints' (p.7). It is VicHealth's view that the low number of complaints is not an indication of the effectiveness of the AAPS, but rather an indication of the lack of public awareness and understanding about the ABAC scheme. Currently, there is no easily accessible information for the general public about the ABAC scheme, such as a dedicated website.

Recent research has revealed that there is very limited public awareness and confidence in the ABAC scheme (see King Talyor Carroll 2005). Less than three in ten (28%) people surveyed reported an awareness of restrictions or regulations covering the advertising of alcohol, in terms of what can be said or shown. Furthermore, most people surveyed did not know how to make an effective complaint (King, Taylor, and Carroll (2005b).

- 4.2 Only one in seven (14%) people surveyed reported they had heard of the ABAC scheme, and of these people, the majority (57%) could not describe what they thought the scheme related to. It is estimated that **only 3 per cent of total adult population are aware of the existing ABAC scheme and know what it relates to** (King, Taylor, and Carroll 2005b p.2).
- 4.3 Most people surveyed did not know how to make an effective complaint and the few people who had complained were not satisfied with the result. Among the 30% of people who reported being concerned about any alcohol advertising, only 2 per cent had made a formal complaint. Some of the reasons why those who were concerned but who did not make a complaint included the belief it would not achieve anything (30%), not having time (25%), and not knowing who how/where to complain (15%). Among the few who did complain, none reported having complained to the Advertising Standards Bureau or to the ABAC scheme. 5 of the 7 people who did complain reported not being satisfied with the outcome of the complaint (King, Taylor, and Carroll 2005b p.2).
- 4.4 Given the general lack of public awareness of the ABAC scheme, and furthermore, the public's lack of understanding of how the scheme works, VicHealth recommends that a comprehensive social marketing strategy be implemented which should aim to:
 - Promote public awareness of the ABAC scheme
 - Provide clear, up-to-date, and accessible information about how the ABAC scheme works
 - Provide the public with examples of advertising, packaging and naming that breaches the ABAC, and examples of non-breaches.
 - Provide a centralised point of information about the ABAC scheme for the public (i.e. a dedicated web site AND a free-call information line)
- 4.5 VicHealth recommends that the above social marketing strategy should be funded by the signatories to the ABAC scheme, as this would demonstrate their commitment to responsible self-regulation of alcohol advertising. The size of financial contribution from each of the signatories to this fund could be determined according to their respective sizes and/or expenditures on advertising. Given the substantial amount spent each year on advertising by the alcohol beverage industries (\$130 million) and the total size of the industry in economic terms, of \$18 billion annually, even a small contribution of the annual advertising expenditure by each of the signatories' member companies could generate substantial funds for a social marketing strategy.
- 4.6 VicHealth recommends that the above social marketing strategy should be developed, implemented, monitored and evaluated by the Department of

Health and Ageing in consultation with the Ministerial Council on Drug Strategy.

- 4.7 VicHealth supports section 4.5 of DSICA's proposal ('Communication of the scheme to the public'), but recommends that this be incorporated within the social marketing strategy proposed above.
- 4.8 In summary, VicHealth believes that much of the potential public benefit from the proposed retailer alert scheme is likely to be jeopardised because of the ineffectiveness of the existing ABAC scheme, as described above.

5. Comments about the proposed 'retailer alert scheme'

- 5.1 VicHealth has serious reservations about the proposed 'retailer alert scheme' because it is proposed as an extension of the existing ABAC scheme which, as outlined above, has been shown to be of very limited effectiveness in regulating alcohol advertising in Australia. VicHealth therefore disputes the claim in DSICA's proposal to the ACCC that the existing ABAC scheme 'provides an appropriate vehicle for the incorporation naming and packaging standards' (p.24). VicHealth recommends that consideration be given to establishing an independent body to regulate alcohol beverage naming and packaging.
- 5.2 VicHealth's other major concerns with the proposed retailer alert scheme relate to two aspects of it that appear to contradict and undermine the primary objective of the scheme: 'to minimise unsafe drinking patterns and underage drinking that may result from inappropriately named or packaged alcohol beverages' (p.12).
- 5.3 Firstly, VicHealth is concerned that under the proposed scheme, 'there are transitional provisions to "grandfather" existing names and packaging', and thereby 'protect existing products/packaging from being subject to a Retailer Alert which requests that retailers do not place further order for stocks' (p.17). VicHealth understands this to mean that any alcohol beverage packaging or name that is already in the market place prior to 1 January 2008 will not be subject to the scheme. VicHealth believes that this situation will undermine the proposed scheme by permitting non-compliant products to sit on shelves for sale alongside compliant products simply because the former bears a pre-existing package or name. VicHealth is aware of several existing products that appear to be in breach of the proposed ABAC scheme for packaging and naming of alcohol beverages, and is therefore concerned that these products would be protected from being subject to the scheme. These are listed in Appendix 1 and are only a limited number of examples that were identified from a brief survey to support this submission. Examples of the products listed in Appendix 1 include:
- Twistees
 - Sierra Slammer
 - Cougar XS Bourbon
 - Mudshake

- 5.4 VicHealth also believes that excluding existing products from the proposed scheme would be unfair to new entrants into the market.
- 5.5 VicHealth recommends that ALL current and future alcohol beverage packaging and naming be subject the proposed retailer alert scheme.
- 5.6 The other major contradiction in the proposed scheme which VicHealth is concerned about is the proposition that retailers would actually be encouraged to ‘sell-down’ stocks of products deemed to be non-compliant by the ABAC adjudication panel for up to 60 days after a retailer alert has been issued. This provision appears to contradict one of the main aims of the proposed scheme – that is, to alert retailers to remove inappropriately packaged or named products because they may potentially incite unsafe drinking patterns and/or underage drinking. VicHealth is also concerned that the 60 day sell down period may actually encourage ‘discounting’ of non-compliant products and it is a concern that the proposed scheme does not discourage this practice. Such discounting of non-compliant products may exacerbate the appeal of the products to young people and in turn increase the risk of harmful consumption of the products.
- 5.7 VicHealth recommends that the proposed retailer alerts should request immediate removal of inappropriately packaged or named products.
- 5.8 VicHealth is also concerned that much of the onus for ensuring the proposed scheme works effectively lies with retailers, rather than suppliers. VicHealth recommends that suppliers should be held more accountable under the proposed scheme, possibly with the use of stricter sanctions.
- 5.9 VicHealth is also puzzled and concerned by the claims in section 5.8 of DSICA’s proposal to the ACCC. As stated earlier in this submission, VicHealth regards the public’s scant awareness and understanding of the ABAC scheme as the major flaw in the existing scheme. Therefore, for DSICA to suggest that it sufficient to expect that ‘ordinary members of the public will monitor possible breaches of the Code’ and ‘some health advocacy groups taking a keen interest in monitoring alcohol advertisements’ is grossly inadequate. VicHealth submits that the type of monitoring of the ABAC scheme proposed by DSICA will only serve to retain a fundamental flaw in the ABAC scheme – that is, the lack of public awareness and understanding of the scheme.
- 5.10 With regards to compliance procedures, VicHealth disputes the claim in DSICA’s proposal to the ACCC that industry compliance with decisions under the ABAC scheme ‘is likely to be high, given that there has been 100 per cent compliance with recent ABAC scheme decisions’ (p. 18). VicHealth is aware that very recently, following adjudication by the ABAC panel to uphold a complaint relating to an advertisement for ‘Bondi Blonde’ beer, the manufacturer responsible for the advertisement did not comply with the ABAC adjudication that the advertisement be withdrawn. Because the ABAC scheme is self-regulatory and panel decisions are therefore not enforceable, this situation highlighted the significant weakness in compliance under the

ABAC scheme and the current ABAC Chairman, Mr Gordon Broderick publicly acknowledged that this situation ‘has brought the code into disrepute’ (Brisbane Times 07.06.07).






- 5.11 VicHealth is concerned that while the definitions of ‘alcohol beverage’ in the proposed code includes ‘any particular brand of alcohol beverage’, it is not clear if this does indeed extend to include all alcohol beverages sold on licensed premises. For instance, it is not clear if the code will apply to the naming and packaging of alcohol beverages prepared and sold on licensed premises such as, for example, alcoholic cocktails. VicHealth is aware that there are several examples of house names of alcoholic cocktails commonly sold on licensed premises in Australia that would be in clear breach of the code. Examples of such beverage names include:
- Brain Haemorrhage
 - Between the Sheets
 - Liquid Viagra
 - Multiple Orgasm
 - Sex on the beach
 - Slow Comfortable Screw Against The Wall
- 5.12 VicHealth recommends that the definition of ‘alcohol beverage’ for the purposes of the proposed scheme should more explicitly describe the scope of what is included in this definition.
- 5.13 VicHealth is also concerned that while the stated purpose of the proposed scheme is to present ‘a mature, balanced and responsible approach to the consumption of alcohol beverages, and accordingly must not encourage excessive consumption or abuse of alcohol, encourage underage drinking or promote offensive behaviour’ (p. 12), there are no explicit guidelines for manufacturers regarding the packaging and naming of alcohol beverages to promote this purpose. VicHealth’s concerns follow those raised by participants at the 2004 New South Wales Alcohol Summit Youth Round Table, which identified the packaging of RTDs as a matter of increasing concern. They reported that ‘in a party situation, adults often have difficulty in differentiating between a soft drink or an alcoholic drink. Many participants claimed that this problem is a direct result of the style of packaging currently popular for RTD beverages. The styles of packaging of soft drinks, sports drinks, and energy drinks were thought by many to be almost indistinguishable from RTDs. The small size of the alcohol content information made it of little help in differentiating these products on first glance, in crowded darkened rooms or from a distance’ (New South Wales Department of Gaming and Racing 2004, p.34).
- 5.14 In this context, VicHealth is concerned that the proposed scheme does not include guidelines for manufacturers on such matters as
- Labelling a product in a way to prominently and clearly distinguishes it as an alcoholic beverage, as distinct from soft drinks, etc.
 - Limiting the maximum number of standard drinks that should be contained in cans or small bottles in the interests of not encouraging excessive consumption of alcohol.

- The most appropriate way to present alcohol content information on product packaging (i.e. the mandatory alcohol strength by volume (%) information and the number of standard drinks information).


The inclusion of such guidelines in the proposed scheme would demonstrate the alcohol beverage industries' genuine commitment to preventing and reducing harmful consumption of alcohol. This would also serve to support the Part 2 (m) in the proposed scheme, that naming or packaging of alcohol beverages must 'not encourage consumption that in excess of, or inconsistent with the Australian Alcohol Guidelines issued by the NHMRC'.

- 5.15 VicHealth is also concerned that the proposed scheme does not extend to the regulation of products that are licensed and/or sold by the alcohol beverage industries and others that appear to promote excessive consumption of alcohol or underage drinking.
- 5.16 VicHealth is aware of several existing products that appear to promote excessive or hazardous consumption of alcohol or promote underage drinking is therefore concerned that these products are not subject to the ABAC scheme. These are listed in Appendix 2 and are only a limited number of examples that were identified from a brief survey to support this submission. Products listed in Appendix 2 include:
- 'Bubbie Stubbie' baby's bottle holder
 - 'Dad's emergency supply' 6-can holder with waste strap
 - Victoria Bitter 'Wetsuit' for 750ml bottle
 - Jim Beam hip flask key ring
- 5.17 VicHealth notes that under 5.4 of the proposal, the retailer alert scheme would be reviewed after 3 years of operation (p.16). Given the problems plaguing the effectiveness of the existing ABAC scheme, VicHealth recommends that, rather than a review in year 3, the new scheme, if implemented, should be independently evaluated after 12 months, for 3 consecutive years, and that the reports of these three independent evaluations should be made available to the public as soon as possible after each has been completed.





Appendix 1. Existing alcohol beverages in the Australian market place that appear to breach the proposed ABAC scheme for packaging and naming of alcohol beverages.

Product Image	Product Name and Details	Section of the proposed ABAC scheme that appears to be breached
	<p>Vodka Twistee Shots</p> <p>Liqueur and schnapps</p> <p>Melon & Vanilla, Strawberry & Vanilla, Zambuca & Banana, Blueberry Vanilla, Butterscotch</p>	<p>Part 2 (i): ‘not have strong or evident appeal to children or adolescents’</p> <p>Comment: ‘Twistees’ is also the name a snack food that is popular among children and adolescents.</p>
	<p>Baby Irish</p> <p>Cream liqueur and coffee liqueur</p>	<p>Part 2 (i): ‘not have strong or evident appeal to children or adolescents’</p> <p>Comment: The name ‘Baby’ implies that the product is suitable for children.</p>
	<p>Rattlesnake</p> <p>Lime and Tequila</p>	<p>Part 2 (l): ‘not challenge or dare people to drink’</p> <p>Comment: The name ‘Rattlesnake’ implies that the product is toxic.</p>
	<p>Sierra Slammer Tropic</p> <p>Tequila RTD</p>	<p>Part 2 (h) i: ‘not encourage excessive consumption or abuse of alcohol’</p> <p>Comment: The name ‘Slammer’ promotes rapid consumption.</p>
	<p>Vodka Cruiser</p> <p>Vodka RTD</p> <p>Raspberry, Pineapple, Passion fruit, Ice, Orange and Blueberry</p>	<p>Part 2 (k): ‘not depict any direct association between the consumption of alcohol beverages and the operation of a motor vehicle’</p> <p>Comment: The name ‘Cruiser’ promotes drinking and driving’</p>

	<p>Vodka Cruiser 'Juicy'</p> <p>Vodka RTD</p> <p>Tropical</p>	<p>Part 2 (i): 'not have strong or evident appeal to children or adolescents'</p> <p>Comment: There are non-alcoholic beverages and confectionary bearing the name 'Juicy' that are popular among children and adolescents (e.g. Mr Juicy fruit juice).</p>
	<p>Vodka Mudshake</p> <p>Vodka and milk RTD</p> <p>Chocolate, Banana</p>	<p>Part 2 (i): 'not have strong or evident appeal to children or adolescents'</p> <p>Comment: The name 'Mudshake' is potentially confused with 'milkshake'</p>
	<p>Cougar 'XS' Bourbon</p> <p>Spirits</p>	<p>Part 2 (h) i: 'not encourage excessive consumption or abuse of alcohol'</p> <p>Comment: The name 'XS' is suggestive of 'excess'</p>
	<p>Mississippi Moonshine</p> <p>Spirits</p>	<p>Part 2 (l): 'not challenge or dare people to drink'</p> <p>Comment: The name 'Moonshine' implies that the product is toxic</p>
	<p>Hpnotiq</p> <p>Liqueur</p>	<p>Part 2 (j): 'must not depict the consumption or presence of alcohol beverages may create or contribute to a significant change in mood'</p> <p>Comment: The name 'Hpnotiq' (i.e. hypnotic) implies that product may have psychological effects.</p>

	<p>The Tall Blond Vodka</p>	<p>Part 2 (j): 'must not depict the consumption or presence of alcohol beverages as a cause of contributing to the achievement of social or sexual success'</p> <p>Comment: The name 'The Tall Blond' has sexual connotations.</p>
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Appendix 2. Existing products in the Australian market place that appear to promote excessive or hazardous consumption of alcohol or promote underage drinking

Product Image	Product Name and Details	Section of the proposed ABAC scheme that appears to be breached
	<p>'Bubbie Stubbie' baby's bottle holder</p>	<p>Part 2 (m): 'not encourage consumption that in excess of, or inconsistent with the Australian Alcohol Guidelines issued by the NHMRC'</p> <p>Comment: The product may promote alcohol consumption by small children.</p>
	<p>'Dad's emergency supply' 6-can holder with waste strap</p>	<p>Part 2 (m): 'not encourage consumption that in excess of, or inconsistent with the Australian Alcohol Guidelines issued by the NHMRC'</p> <p>Comment: The product promotes consumption above the recommended low-risk level for men (4 std drinks per day).</p>
	<p>Jim Beam hip flask key ring</p>	<p>Part 2 (k): 'not depict any direct association between the consumption of alcohol beverages and the operation of a motor vehicle'</p> <p>Comment: The nature of product may promote drinking and driving.</p>
	<p>Victoria Bitter 'Wetsuit' for 750ml bottle</p>	<p>Part 2 (k): 'not depict any direct association between the consumption of alcohol and operation of a boat or engagement in any sport (including swimming and water sports)'</p> <p>Comment: The product may promote drinking and swimming/boating/surfing.</p>

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