

# Online Alcohol Advertising Targeted at Young People in South Australia



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# Acknowledgement of Country

We would like to acknowledge that we have written this report on Kurna Country. We recognise the importance of connection to land, spirits, kinship, stories, songs, and traditions to the community. We would like to pay our respects to the past, present, and emerging leaders of the Aboriginal and Torres Strait Islander community. Ngaityalya.

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# Introduction

## The team (Aishath, Alex & Peter)

This project was run and completed by third year Bachelor of Social Work Students from the University of South Australia (UniSA) who are in their placement at the UniSA COC. The students worked together under the guidance of Mr Michael White, Executive Officer of SANDAS, to examine online advertising of alcohol in South Australia and how it impacts young people. The research officially began on March 1, 2023, and is scheduled to continue until late June 2023.

## SANDAS

SANDAS was established in 2004, to enhance community well-being and reduce the harms associated with alcohol and drug use. As the peak body, SANDAS provides independent, state-wide representation, advocacy and support for non-government organisations working in the alcohol and other drug sectors, through networking and policy development. SANDAS is a not-for-profit association funded by membership contributions, the Australian Government Department of Health, Drug and Alcohol Services of South Australia, the South Australian Department of Health and a range of other organisations on a project basis.

## Background

The 2019 National Drug Strategy Household Survey (NDSHS) (Australian Institute of Health and Welfare (AIHW), 2020) indicated that the average age when young people 14-24 started to consume alcohol was 16.2. The survey also mentioned that 30% of young people in that age range consumed at risky levels. Furthermore, the 2017 Australian Secondary Students Alcohol and Drug (ASSAD) (Guerin & White, 2020) survey found that 46% of students aged

12-17 drank alcohol, and 43% of that figure had obtained alcohol from parental figures. With online spaces becoming a key tool for the marketing industry, alcohol brands continue to innovate and increase their appeal (Carah & Brodmerkel, 2022). However, current South Australian policies on alcohol advertising do not align with these changes, which leads to ineffective measures to safeguard young people from alcohol marketing and sales. This research analyses the effects of and methods to counter the targeting of alcohol advertising at young people.

### Effects of excessive alcohol on young people

The effects of alcohol on an individual can seriously impact one's health and well-being. Excessive alcohol consumption has been linked to complex physical health issues such as liver failure, heart diseases, high blood pressure, digestive issues, strokes, cancer, and a weakened immune system (Calina et al., 2021; Department of Health and Aged Care (DHAC), 2023; Piano et al., 2017; Praud et al., 2015; Rehm & Roerecke, 2017). It has also been linked to mental health issues such as the increased risk of suicide, other substance use, memory loss, and a weakened development of the cognitive system (DHAC, 2023; Maillard et al., 2020; Ramalho, 2020; Spear, 2018). Furthermore, research from Watts et al. (2021) showed that early engagement with drinking may have significant negative effects on personality development with lifelong effects including increasing the risk of a person developing externalising psychopathology and it is associated with several disorders such as mood disorder, prodromal schizophrenia, and increased impulsivity. It can be said that excessive alcohol consumption may lead the quality of life of a young adult to decline. Stronger regulations around alcohol advertising must be put in place to reduce early exposure.

## Goals and objectives

The goals and objectives of this project are:

- Investigating the alcohol marketing industry and how their online campaigns appeal to young adults and adolescents
- Examining how alcohol advertising impacts young people in their developmental stages and vulnerabilities
- Highlighting the significance of COVID-19 and its relationship to increased online alcohol sales and advertising, as well as the usage amongst young people
- Critically analysing Australian and foreign legislation and policies regarding alcohol and advertising
- Develop recommendations to amend current policies and regulations concerning alcohol and young people.

# Methodology (Qualitative)

SANDAS, with the UniSA COC, launched this project to examine online alcohol advertising. Following initial discussions, the research focuses on online advertising targeting young adults between the ages of 14-24 in South Australia. It also explores ways to improve current policies to safeguard young people from targeted advertising and hold alcohol advertisers accountable.

To ensure the result is comprehensive and of quality, this project involves qualitative research that focuses on reviewing the literature. The literature includes academic and peer-reviewed materials, evidence of alcohol advertising from social media, and official government and organisation documents available online.

The research was completed online, with all materials sourced from the web, Google Scholar, the UniSA library, and UniSA databases. Evidence of advertisements was sourced from online platforms such as Facebook and Instagram. They were mostly gathered from official accounts of alcohol brands and influencer posts that appeared or were obtained from the team's social media platforms during the course of the project. Lastly, government materials sourced from official websites were used to provide statistics on young adults' alcohol use and trends regarding policies and policy change.



# Findings

## Section 1: Examining current legislation surrounding alcohol and young people

### Liquor Licensing Act 1997

The Liquor Licensing Act (1997) aims to govern and manage the promotion, vending, supply and consumption of liquor responsibly and diminish the harm or potential harm due to excessive usage. The Act lists the possible licences a person or merchant can register for. The categories are general and hotel, on-premises, residential, restaurant and catering, club, small venue, packaged liquor sales, and liquor production and sales. Currently, no set licence aims to control the operations of online stores and home deliveries. As long as businesses have a valid licence, they can sell and advertise packaged alcohol online. Furthermore, in South Australia, liquor must be sold at a separate premise from establishments such as supermarkets or convenience stores. However, it can be argued that online space should be treated as separate as it functions differently from a physical store.

There are loopholes that alcohol companies can use to their advantage. Clause 115 states that a valid age ID must be presented when buying alcohol at licensed premises. However, this section does not translate well to online spaces. For example, with home deliveries, age verification is required to receive the alcohol. Yet, the buyer can directly instruct the seller to leave alcohol unattended if they cannot collect the package (Government of South Australia, 2023a). This becomes an issue if a minor were to contact the licensed seller about their delivery directly.

Furthermore, division 8, clause 108, states that alcohol should not be supplied to an intoxicated person. With online websites, alcohol companies and retailers cannot physically

control the consumption of an intoxicated individual. A young person may have an increased risk of experiencing alcohol-related harm through bulk buying alcohol online. To argue further, part 7, clauses 110 and 100A states minors must not be supplied liquor under any circumstance. With the nature of online stores, licensees might breach the Act by selling liquor to minors without their knowledge. Minors may use an adult's card and details to purchase the alcohol online. Thus, these instances show how online spaces can make young people vulnerable when left uncontrolled.

In general, penalties are directed towards licence holders and alcohol consumers. For example, part 10 declares that unlawful consumption of alcohol can be penalised, which makes the alcohol user accountable. However, no penalties are imposed on retailers or suppliers. Thus, this shifts the accountability for handling alcohol responsibly to the individual, rather than the seller. It can be argued that without strict penalties, suppliers will continue to operate carelessly in a virtual environment. Some may target young adults and younger individuals as part of their market or at least be negligent as to whether a young person is accessing alcohol. The Act must be amended and revised to reflect the current situation of online sales and the emergence of marketing targeted at socially connected young people.

### Alcohol Beverages Advertising Code (ABAC) Scheme

The ABAC scheme (ABAC Ltd., 2023a) is a self-regulating organisation that aims to hold alcohol marketing accountable to national standards. It provides a pre-vetting service which allows alcohol marketers to receive a review of their marketing materials before publication. There are some media categories classified as compulsory for pre-vetting. This includes television, outdoor, cinema, and radio advertising. However, the ABAC scheme made digital alcohol advertising an optional category for pre-vetting, meaning that online alcohol ads are not required to go through an assessment before they are made public (ABAC Ltd., 2023b).

Further, online influencers and user-generated content (UGC) are not covered in the ABAC scheme (Pierce et al., 2017, p. 2). UGC can be defined as a personal contribution that is published on platforms that do not involve professional action (Organisation for Economic Co-operation and Development, as cited in Naab & Sehl, 2017, p. 1258). They are not considered businesses and therefore, not required to utilise the pre-vetting service. Thus, it is difficult to seek adjudication of alcohol advertising by online influencers and UGC producers by the panels even if they breach the regulation.

The voluntary nature of the scheme makes the complaint system of ABAC too weak to safeguard young people from targeted alcohol advertising. The 2021 annual report (ABAC Ltd., 2021) showed 288 complaints, and approximately 53% resulted in determinations. Moreover, only 27.8% of the complaints against adverts were upheld. In 2022 (ABAC Ltd., 2022), 126 complaints were made. 50% resulted in a determination, and 28 complaints were upheld.

The failure of immediate intervention is one of the weaknesses of the complaint system. The 2021 annual report indicated that determinations were completed within an average of 19.6 business days. In 2022, it was 17.7. This suggests that as the cases are being reviewed, campaigns will have run and may have ended by the time a determination is made (Pierce et al., 2019, p. 21). Young people may have viewed and interacted with the unregulated advertisement. Therefore, there is a lack of immediacy in the system, and improvements are necessary in this area.

In addition, despite five new placement rules introduced under the ABAC in November 2017, the efficiency of the policy to hold alcohol advertisers accountable still came into question. Pierce et al. (2019) indicated that because of the lack of transparency and clarity of the government, the rules do not become an effective restriction to avoid alcohol marketing targeting minors. Aiken et al. (2018) also indicated that alcohol advertisements that violate

the code are commonly consumed by young people on social media. The ABAC scheme, even with the new rules, fails to keep companies responsible and accountable to safeguard young people.

### Australian Association of National Advertisers (AANA)

The AANA (2023) is a voluntary self-regulation organisation that aims to promote the interests of retailers regarding the advertising of their products. The company works alongside Ad Standards (AU) to develop and review the codes they have set out. The AANA collaborates with many other regulators to ensure that stakeholders and the government are informed. Some regulators involved with the organisation are the Association of New Zealand Advertisers, the Australian Food and Grocery Council, the Brewers Association, and the Media Federation of Australia. The AANA also works with big brands such as Coles, Google, Meta, TikTok, Twitch and Woolworths to ensure advertising is regulated.

### Ad Standards (AU)

Ad Standards (2023a) is the complaint system that accompanies the AANA. It covers the general advertising industry, unlike ABAC, which is specifically for alcohol brands and retailers. Regarding alcohol advertisements, complaints are directed towards Ad Standards first, and the ABAC is sent a copy of the complaint (Ad Standards, 2023c). Both organisations work in conjunction to review alcohol advertising complaints raised. This is to determine which jurisdiction a breach falls under.

In 2021 (Ad Standards, 2021), out of the 361 cases raised, 315 cases were reviewed, 230 were dismissed, and 85 were upheld. Alcohol-related complaints come up to 5.84% of the total number of other types of complaints. This makes alcohol the sixth largest category of complaints received by the organisation. It is also worth noting that between January 2018

and December 2023, there were 33 complaints made about internet advertising of alcohol, 10 of which were partially or fully upheld with the remainder being dismissed (Ad Standards, 2023b).

When reviewing a complaint, the panel at Ad Standards must follow the code set out by the organisation. Alcohol in advertising falls under section 2.6 of the Health and Safety of the AANA Code of Ethics (2021). However, there is no standardised definition of health and safety regarding alcohol. The panel will use the common definition of the word while considering factors relevant to the situation to give context when making a judgement. It can be argued that this may influence the way alcohol advertisement complaints are evaluated and treated. For example, many online alcohol advertisements are designed to appeal to a younger age group but may not be viewed as such by the panel as there is not a set definition of what this would look like. Nonetheless, it is important to note that Ad Standards deal with all types of advertising, and it may be difficult to set a standardised definition.

Ad Standards (2023d) also covers advertising on social media. In 2021, social media was the 2nd largest medium of advertisement complaints following free-to-air TV (Ad Standards, 2021). AANA's Code of Ethics states that all types of advertising, if it is published and paid for by the brand or retailer, are considered and can be reviewed by AANA. However, UGC does not fall under the code and thus leaves a grey area of online alcohol advertising which is exploited by many alcohol sellers.

Overall, as Ad Standards is a voluntary self-regulatory system, there is a lack of legal accountability to stakeholders who are involved. They are expected to pay for their AANA membership and observe the Ad Standards and ABAC code but, this does not equal better advertising behaviours. A more established regulatory system is required to ensure the impacts of online alcohol advertisements do not negatively impact younger people.

## DrinkWise.

DrinkWise (2023) is a not-for-profit organisation that aims to promote the safe and healthy consumption of alcohol. It also aims to reduce the early introduction of alcohol to young Australians. The research done by DrinkWise is done through consultations with professionals in relevant fields to ensure that the information used to guide the organisation's campaigns and media releases is evidence-based. For example, DrinkWise's 'It's okay to say nay' campaign aimed to promote the setting of healthy boundaries regarding alcohol consumption to parents and young people.

Companies such as the Coles Liquor, Endeavour Group, and Diageo are contributors to the organisation. However, there is still often a disconnect between their advertisements and the standards that DrinkWise has set. Alcohol continues to be promoted to and consumed by young adults in unhealthy amounts including by those under the legal age.

A study by Coomber et al. (2018, p. 133) has shown that not many Australians have heard of DrinkWise and that they did not know that the alcohol industry is involved in the operation of its delivery to the public. The study also revealed that people were less likely to view its warnings as important due to it not being a part of the government. Furthermore, the labelling placement and message quality were seen as ineffective. This is due to the message being perceived as the 'bare minimum' and general knowledge (p. 134-135). Thus, it can be said that the government must work together with DrinkWise to increase the scale of the organisation and develop the program to reach its goals. This may require removing the influence of the alcohol industry in all its activities and funding.

## Social media

Online advertising and vending of alcohol towards minors are harder to monitor due to the vast scale of the internet. Social media applications such as Instagram (2023b) and

Facebook (2023) state in their general advertising policies that alcohol can be promoted to anyone over 18, and if the material meets the local legislation and standards. They also mention countries where advertising alcohol is illegal or has restrictions, and state that they defer to local policies. However, there are inconsistencies in these policies. For example, screenshot B shows the Instagram profile of Hennessy as restricted due to the individual accessing it not being over the legal age of 21. Screenshot C of Johnny Walker's page also displays the same restrictions. Screenshot D shows the same individual being able to access Heineken's page openly without an age restriction. This displays the inconsistency of accessing alcohol-branded pages on social media platforms.

#### Influencers in social media

In social media, the alcohol industry utilises high-profile influencers to encourage their followers to purchase alcohol with weak scrutiny. According to research by VicHealth (2020), only a quarter of influencers are transparent about their relationship with alcohol brands while almost three-quarters of the top 70 Australian Instagram influencers present alcoholic drinks in their posts. Most influencers promote alcohol products while ignoring the requirements to mention their sponsorship. The impressionable young audiences are unaware that they are trusting a person who is effectively an employee of the alcohol brand. They use simple pictures and short videos which are effective adverts to make their sponsored products appear glamorous to young people.

For example, Rebecca Judd, a social media influencer who has 763K followers (information gathered on the 22nd of May, 2023) on Instagram, has shared several posts to promote alcohol brands and alcohol events held by alcohol companies. Screenshot A showed that Ms Judd was participating in an event where she held a glass of Rosè Cider and mentioned two accounts in her caption, one of which is an alcohol brand. However, the Australian Competition and Consumer Commission regulated that influencers should disclose clearly to

their followers that it is a promotion if they receive payments or free products or services from a company in exchange for advertising. Ms Judd did not disclose sponsored relationships in the post when she was promoting the alcohol brand Strongbow. Despite not meeting the guidelines, the 'advert' is still online.

However, it is very difficult to monitor social media as the breadth of the internet is too extensive to be controllable, they can ignore most of the regulations such as the ABAC scheme and Ad Standards (AU) (Boniface et al., 2023, p. 217). There are not enough resources provided to advertising monitoring organisations to undertake this work, leaving the process of making complaints to individuals resulting in there being no effective control mechanisms. Thus, the ineffectiveness of inspection leads to influencers failing to keep accountable to the regulation. As the major platform for influencers, Instagram has policies that put some restrictions on business partners who sponsor influencers. Instagram's (2023a) policies regarding paid alcohol promotion depend on the country in which the advertisement is being promoted. If alcohol advertising appears in Australia, the advertisement will follow Australia's policies. However, there are no significant policies in Australia or South Australia, in particular to maintain alcohol influencers' accountability and responsibility online. Policies and guidelines that are currently in place, are voluntary and not enforced. Therefore, these promotions or adverts reach young people encouraging their alcohol use through influencers and there are no barriers to prevent this from happening.



*Rebecca Judd's alcohol post*

(Rebecca Judd, 2019)

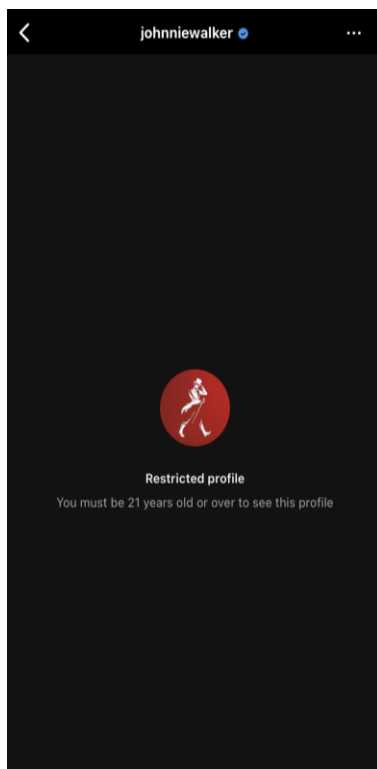
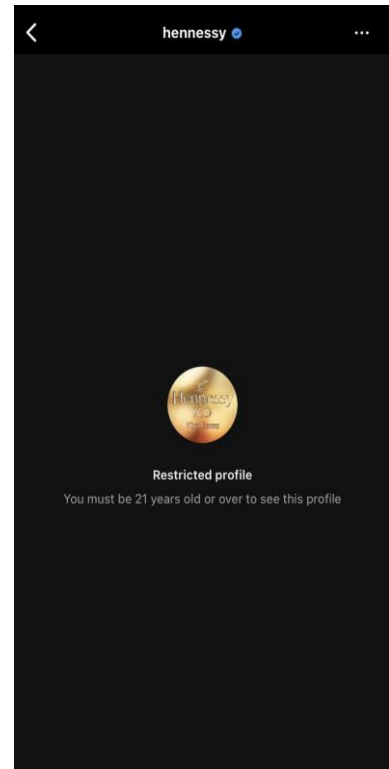
Screenshot (A)



*Hennessy's Instagram page*

(Hennessy, 2023)

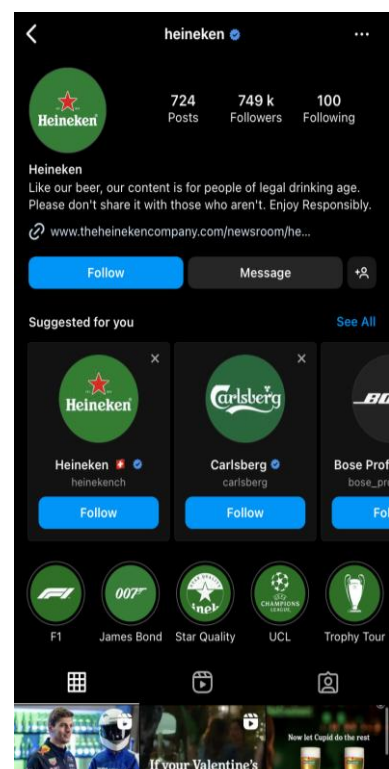
Screenshot (B)



*Johnnie Walker's Instagram page*

(Johnnie Walker, 2023)

Screenshot (C)



*Heineken's Instagram page*

(Heineken, 2023)

Screenshot (D)

## Section 2: Review of legislations and policies regarding online alcohol advertising in the UK, NZ, Canada, and the US

### United Kingdom (UK)

In the UK, the Committee of Advertising Practice (CAP) is a sister organisation of the Advertising Standards Authority (ASA) and responsible for writing the Advertising Codes (ASA & CAP, 2023a). Moreover, the ASA is the main scheme that administers the advertising standard and handles most complaints. In the UK Code, there is a specific section for alcohol advertising. Compared to the Australian regulation system, the UK's ASA and CAP co-regulate with Ofcom, which is the UK's communications regulator, to inspect broadcast advertising. Ofcom retains the ultimate powers and the right of decision over the Broadcast Advertising Code (Jones & Gordon, 2013, p. 7). Considering non-broadcast advertising, the CAP and ASA, similar to ABAC schemes, have self-regulatory systems managed by the advertising industry. The lack of independent oversight and control has caused a failure of the system to safeguard young people from targeted advertising online (Boniface et al., 2023).

Considering the structure, the CAP is similar to the AANA code. It is divided into general rules that the whole advertising market needs to follow and sections that are specific to different categories of advertising. Also, the ASA is the primary complaint system for all advertisements. It centralises complaints in one process and has a standard based on the general advertising rules. However, the Australian AANA and ABAC schemes have complaint panels that run independently and pass complaints to each other to ensure ads conform to both codes.

The ASA has limited capacity to enforce determinations against advertisers; the ASA cannot forcibly remove an ad. However, the ASA can penalise advertisers if they refuse to withdraw

or modify once the advertisement is deemed to have broken the code. First, looking into online sanctions, the ASA will put the advertiser's details into a dedicated section of the ASA website until they comply. The ASA can then place paid-search ads, which is a type of online marketing strategy that allows individuals and organisations to pay search engines to place ads prominently on results pages (Bayer et al., 2020, p. 790) to emphasise the advertiser's name; the problem with the ad and notice of non-compliance. Moreover, the ASA will request the search engines and social platforms to remove paid-search ads commissioned by the advertisers they have identified as problematic. For example, when social media influencers fail to disclose brand collaborations or paid promotions regarding alcoholic products to their audience, their details are listed on the website for up to three months (ASA & CAP, 2023b).

Furthermore, considering offline sanctions, the ASA will collaborate with media owner members in the CAP to stop providing services to those non-compliant advertisers and temporarily withhold their trading privileges. Also, the ASA will request industry members in the CAP to disqualify industry awards to those marketers who do not comply with the decision. Finally, the ASA will refer the case to the statutory system for further action.

The ASA has received some criticisms from academic papers. Boniface et al. (2023, p. 217) challenged the effectiveness of the system and code. They indicated that the code has been unsuccessful in safeguarding underage adolescents from targeted advertising. The article continues to criticise the ineffective and outdated regulations of online alcohol advertising in the UK, the failure of self-regulation and the difficulty of inspecting the contents and aged verified restrictions in online marketing. Furthermore, similar to Australia's system of alcohol advertising, the UK has not taken the initiative to inspect online advertising and the accessibility of ads. Rather than actively participate in the online inspection, they rely on public complaints. Thus, there will be recommendations to improve this part.

## New Zealand (NZ)

NZ's policies regarding alcohol advertising are on a self-regulatory basis and are operated by the Advertising Standard Authority (NZ) (ASA) (2023a) and the Association of New Zealand Advertisers (ANZA) (2023b). ASA is a self-regulatory organisation that ensures that advertisements are shown in a responsible, respectful and honest manner that highlights social responsibility and truthful presentation. ANZA acts as a representative for advertisers, advocates for the industry, and provides resources to assist members. Both organisations work together to ensure the safe promotion of ads per the set standards.

Regarding alcohol and minors, the ANZA offers two voluntary pre-vetting services that are user paid. They are the Liquor Advertising and Promotion Pre-vetting Service (LAPPS) (ANZA, 2023c) and the Children's Advertising Code Pre-vetting Service (CAPS) (ANZA, 2023a). LAPPS focuses on helping advertisers promote liquor in a way that meets the rules and guidelines of the Alcohol Advertising and Promotion Code (ASA, 2023b). The code applies to alcohol advertising on platforms such as social media, television, posters on buses and streets, websites and influencers. CAPS handles advertisements that target younger individuals and is guided by the Children and Young People's Advertising Code (ASA, 2023c). This code includes guidelines around safety, peer pressure, sale promotion schemes, and promotional offers that target children and younger individuals.

The Advertising Standards Complaints Board (ASCB) under the ASA handles all advertising complaints. The chair will decide whether the complaint is eligible. If so, the board will assess the case under the ASA codes. As for online advertising, influencers were not included as an advertising platform, but ASA (2020) updated their guidelines to combat the rise of unregulated social media advertising. The ASCB and ASA acknowledged that the promotion of alcohol cannot come to a halt, however, measures can be taken to avoid the harms it causes. Thus, a separate complaint form to report social media influencers who

breach guidelines was created (ASA, 2023d). The ASA will contact the influencer to withdraw or clarify their advertisement. However, the complaint will be transferred to the standard system if the influencer fails to comply.

A study by Nicki et al. (2021) conducted regarding the complaints made to the ASA from the 1st of January 2017 to the 30th of June 2020 showed that NZ's self-regulatory system is ineffective in protecting minors from targeted alcohol advertising. Complaints were made regarding advertisements marketed electronically (e.g., e-mail, websites), traditionally (e.g., television, bus stops), and via social media. Companies were promoting alcohol as a form of coping mechanism, showing that alcohol has health benefits, using inappropriate images of women online and also placing ads in locations near school areas. The authors also found that the time taken for the board to make this decision took at least 60 days while the ads were still available to be viewed by young people. Furthermore, the study shows that age verification features on online alcohol sites do not prevent young people from gaining access - a false age or birth year can be easily input to bypass the system. Moreover, social media sites have plenty of advertisements shown to young people despite age restrictions, which poses the same issue in Australia. Therefore, self-regulatory systems do not work even with updated guidelines and accessible resources to advertisers.

## Canada

In Canada, policies regarding alcohol and advertising are at a federal level but separated and further regulated depending on each province. The Canadian Radio-television and Telecommunications Commission (CRTC) (2023) oversees the operations of all types of advertising for the country. Alcohol advertisements are legally required to comply with the CRTC's Code for broadcast advertising of alcoholic beverages (CRTC, 1996). Like Australia, complaints about ads are directed towards Ad Standards (CAN) (2022), Canada's national self-regulatory complaint system.

Four provinces have restrictions implemented in their self-regulatory systems regarding alcohol advertising in online spaces. They are Nova Scotia, Quebec, Ontario and British Columbia. The self-regulatory system of British Columbia, which is the Liquor and Cannabis Regulation Branch (2019), has a section that specifically addresses social media usage of alcohol advertising. The province of British Columbia's legislation surrounding online advertising and vending is similar to Australia, in which businesses and retailers who already have a valid licence can utilise the Internet as part of their marketing schemes under the Liquor Control and Licensing Act (2015) and the Liquor Control and Licensing Regulation (2016). Furthermore, exclusively online stores that sell alcohol are not allowed to operate. It is the same for Nova Scotia as they have a specific section in their Responsible Advertising and Giveaway Guidance document (Nova Scotia Liquor Corporation, 2023, p. 10-12).

However, Paradis et al. (2020, p. 149-150) found that online alcohol advertisements circulated in the mentioned provinces still breach regulations by promoting excessive consumption, connection to social inclusion and status, and enjoyment towards young adults. The authors also argue that self-regulatory codes in Canada do not work. Instead, it creates a competitive market for drinking venues and clubs to increase online advertising. Furthermore, it leads to the normalisation of alcohol consumption among the younger population. To amplify this argument further, a study by Thompson et al. (2023, p. 208) highlighted the high prevalence of UGC shared by alcohol companies on social media in Nova Scotia. The authors found 321 identifiable violations of the CRTC code from the data gathered, some of which involved illegal consumption of alcohol in dry areas, and more concerningly, some included representation of activities that may interest children. Despite positive attempts at control alcohol continues to be promoted online regardless of the regulations that are set in place.

Canada's legislation and policies show that self-regulatory systems do not effectively reduce predatorial online alcohol marketing. It also shows that young people and minors in Canada

are still being targeted by alcohol advertising. Therefore, Australia must develop safe online spaces for young people, free of alcohol advertisements by involving the government in the development and implementation of legislated alcohol guidelines with appropriate constraints and penalties where these constraints are breached.

## United States (US)

At the federal level, the Alcohol and Tobacco Tax and Trade Bureau (2023), authorised under the Federal Alcohol Administration Act (1935), governs the regulation of alcohol advertising in the country. However, every state has its own expanded set of systems that regulate the sale and advertising of alcohol. For example, in California, the Department of Alcoholic Beverage Control (2023) provides the administration, licensing, and compliance of alcohol-related matters. New York has the State Liquor Authority (2023) and the Division of Alcoholic Beverage Control.

In the US advertising is mostly a self-regulated and voluntary space. The US has three established national self-regulatory organisations. They are the Beer Institute (2023), Wine Institute (2023), and Distilled Spirits Council of the United States (2023). In 1985, self-regulation was proposed by then-industry leaders as retaliation to a complete ban on alcohol advertising by the US House of Representatives Subcommittee on Telecommunications (Noel et al., 2016, p. 58). At the same case hearing, the industry leaders affirmed that alcohol advertising was not associated with youth drinking behaviour. Instead, they insisted that self-regulatory codes would be able to safeguard minors and children from the marketing of alcohol if the situation arises in the future. At present, each of the three organisations has updated codes with a section for digital spaces such as social media and web pages.

However, studies from the US have shown that these self-regulatory codes are ineffective as online alcohol advertising continues to violate set guidelines. Lobstein et al. (2016, p. 24) found that some digital marketing was linked to the direct delivery of alcohol to minors. The authors also found that the websites of alcohol retailers were not effective enough to verify age, with 40% of home delivery services not verifying buyers' IDs.

Furthermore, a study by Barry et al. (2018, p. 260) discovered that several alcohol brands in the US market their products in a way that promotes the success of sociability through Twitter. Brands such as Jack Daniels, Malibu, Heineken, and Captain Morgan have posted more than 2000 times on the social media platform from August 2010 to August 2017. Another study by Nagata et al. (2023) determined that exposure to online alcohol advertising on social media applications was one of the reasons for earlier alcohol usage in adolescents in the US aged 10-14.

The nature of self-regulatory systems does not effectively regulate the industry and its advertising activities. Alcohol continues to be promoted towards minors and young adults on online platforms in manners that violate codes and guidelines set by the industry. Thus, the government must intervene to control the space accordingly.



## Section 3: Online advertising

### Evolution of advertising

As the technological era advances and social media trends continue to evolve, major companies have learned to adapt their marketing to trends (Andrejevic et al., 2021, p. 11; Carah & Brodmerkel, 2022, p. 116). Alcohol sales and distribution businesses such as Dan Murphy's, Beer, Wine, and Spirits (BWS), and Liquorland have contributed to these changes, with online advertising becoming a significant tool to reach customers. The Coles group in their 2022 Annual Report (2022, p. 45), who own Liquorland, discussed their strategy towards e-commerce. The company emphasised the importance of improving its presence online due to the competitive environment of the alcohol industry. The Endeavour Group, the parent company of Dan Murphy's and BWS, have also stated a similar approach in their 2022 Annual Report (2022, p. 57) to prioritise their e-commerce sales as part of their remuneration framework. There are also online stores such as Sippify (Bickford's Australia, 2023) and Jimmy Brings (2023a), which exclusively cater to online consumers and promote rapid and easy home delivery of alcohol.

Over the last decade or more, alcohol brands have started to target online audiences regarding alcohol products. For example, brands such as Jack Daniel's and Bundaberg have increased their engagement with their consumers online (Martino et al., 2021, p. 8-9). This change can be seen in the increase in social media posts on platforms such as Facebook, Instagram, and Youtube (Noel et al., 2020, p. 57). Furthermore, a report by the Foundation for Alcohol Research & Education (FARE) (2023a) discussed the engagement of alcohol businesses in online advertising. It revealed that between November 2021 and November 2022, there were 39,820 distinct alcohol advertisements captured from different social media accounts on Meta platforms in Australia (p. 5). Moreover, the shift to online advertising has proven beneficial to alcohol brands that put effort into developing their social media presence. IBISWorld (2023) indicated that online alcohol sales in Australia averaged over

14% annual growth before the COVID-19 crisis, The evidence clearly shows the adaptability of the alcohol industry in response to the advancing digital age.

### COVID-19 and online sales

While digital advertising existed before the pandemic, many alcohol brands became more prominent in their online customer interaction during COVID-19. Colbert et al. (2020, p. 436) also showed that alcohol retailers promoted the stockpiling of alcohol and heavy drinking while in-home isolation measures. The authors also discovered a significant increase in marketing on social media during the pandemic.

Safety measures during the pandemic caused people to isolate themselves at home, and many in-person festivals and events, hotels and nightclubs were allowed limited operation, reducing people's access to alcohol and the environments in which they consumed it. This change affected alcohol brands' reliance on physical advertising in retail precincts, licenced premises and public events. Alcohol advertising at sports games such as the Australian Football League, National Rugby League, and Cricket accounted for approximately two-thirds of all alcohol sponsorships in 2018 (Scully et al., 2023, p. 2). With people no longer attending events where they would have been exposed to advertising, alcohol companies needed to find new ways to engage with their current and potential customers.

According to the report published by FARE (2020a, p. 3-4) titled 'Alcohol advertising on social media platforms - A 1-year snapshot' which looked at online advertising density, in one example 107 alcohol-sponsored advertisements appeared in a one-hour online surfing program, making it an average of one alcohol ad every 35 seconds. These ads convey six categories of messages. These messages are that: it is easy to access alcohol: there are money-saving deals; purchasing in larger quantities has benefits such as savings and 'never running out'; drinking alcohol during the pandemic is acceptable; alcohol can be used as a

coping mechanism; and people can assuage their concern by opting for 'healthier' alcohol products. As young people are more likely to access online sites, they were likely to have been exposed to more advertising encouraging them to buy alcohol as a result.

### Social media algorithm

However, the transparency and regulation of online marketing have been called into question. The same report (FARE, 2020a) highlights that there is a lack of transparency and accountability of alcohol brands on platforms such as YouTube, Snapchat, Twitter and TikTok. The report (p. 17) also mentions that it has become difficult to monitor and observe data at an individual level due to the large scale of the internet. This is a significant difference between advertising on free-to-air media or place-based sites. Online advertising can be targeted at particular cohorts or groups or even at the individual. Carah and Brodmerkel (2022, p. 113-114) argue that a lack of transparency may be due to the evolution of social media as a paid marketing platform instead of an organic one. The authors also mention that although companies target a larger audience, they may create a false sense of personalisation presented to users. Kingsnorth (as cited in Askoy et al., 2021, p. 1096) explains personalisation to be using 'big data' to collect data on an individual's personal interests, demographics, routines, and online behaviour to create an individualised algorithm. These algorithms then enable advertisers to specifically target products at individuals who engage with products or activities and events (Fourberg et al., 2021, p. 18). For example, a person purchasing a ticket to an event online may have their data shared with companies sponsoring that event, where the sponsors are alcohol companies. Booking a ticket to the footy can lead to being marketed a specific brand of beer.

UGC also contributes to the algorithm. It shifts the focus of accountability towards users and social media influencers, as they can promote alcohol to a younger audience while adhering to or avoiding the social media policies that are supposed to control advertising (Hendriks et

al., 2020, p. 3; Mayrhofer et al., 2020, p. 168-169). The research found that young people may find it more appealing when viewing relatable content and are more inclined to engage with products that are framed in this way (Kemp et al., 2021, p. 107). Both personalisation and UGC can have negative results for advertisers if companies continue to not be transparent in their marketing strategies. People can get annoyed or 'creeped out' if advertisers seem to know too much about them. Given the power of advertising and the algorithms that underpin it, it is important for online alcohol advertising to be actively regulated.

Research by Aiken et al. (2018, p. 236) which studied the perception of youth about alcohol advertising revealed that most of the 351 participants aged 16 to 19 perceived ads to be appealing. The authors also found that the main message young people receive from alcohol advertising is that alcohol enhances mood and social success. Moreover, they found the use of actors who look under the age of 25 in alcohol advertising may also increase its attraction to both adolescents and young adults. Thus, it is common for adolescents and young adults to receive unregulated targeted alcohol advertising which directly appeals to them. This includes advertising which is specifically designed to be attractive to young people including those under the age of 18.

Furthermore, research by Barry et al. (as cited in Noel et al., 2020, p. 57) shows that alcohol brands on Instagram focus on promoting positive emotions, personal achievement, individuality, and camaraderie. It can be said that the strategies of alcohol brands attract young people's vulnerabilities by eliciting an emotional response and encouraging interaction with the brand on social media. However, the current regulatory system in South Australia is not doing enough to prevent exposure to online alcohol advertising by young people, nor to limit the use of exploitative techniques that infer alcohol will improve social status, and attractiveness and increase popularity and social engagement. Therefore, policies must be implemented to regulate the digital marketing of alcohol.

## Section 4: Young people and alcohol

### Alcohol consumption

In Australia, the drinking culture has been a long-standing part of society, especially among young people (Davidson et al., 2023). The 2019 NDSHS revealed that 77% of Australians consumed alcohol that year (AIHW, 2020). Young adults who drink were more likely to consume 11 plus drinks in a single sitting in 2019 and 5 and more drinks in 2020 (Australian Bureau of Statistics (ABS), 2022; AIHW, 2022). This cohort drinks at levels that increase the risk of developing long-term health issues and one-off alcohol-related injuries. Furthermore, the 2019 NDSHS report also touches on alcohol-related risks, with 1 in 10 people being alcohol dependent and 1 in 3 young people having experienced harmful incidents whilst using alcohol. Excessive alcohol consumption and how advertising links it to social attraction is an ongoing issue that needs to be addressed. Alcohol usage is not linear but affected by the intersection of an individual's biopsychosocial factors. It is also important to note that there has been a decrease in the number of young people consuming alcohol overall since 2016 (AIHW, 2020).

### Bronfenbrenner's ecosystems theory

Bronfenbrenner's (1979; 1994) ecosystems theory explains that an individual has multiple complex relationships that intersect to form different systems, which impacts their behaviour, thoughts, and resources when faced with a situation. More recently, social media has been recognised as a significant element of one's systems (Navarro & Tudge, 2022). Previous papers have utilised the ecological systems theory as a guide to explain excessive alcohol use and design prevention methods (Aytur et al., 2022; Kasser & Linn, 2016; McGill et al., 2021; Niu, 2023).

It could be argued that the development of young people's life stages affects their perspective towards online alcohol advertising and consumption. Zimmerman and Farrell (2017, p. 235) found that young people living in households where a high level of parental substance use is apparent will more likely use substances. The authors also highlight that the neighbourhood young people live in contributes to peer substance use and the less dangerous perception of substances. A report by Livingston et al. (2015, p. 20) about the impact of licensed premises on communities shows that proximity and accessibility contribute to increased consumption of alcohol.

Secondary supply is also another issue within the microsystem, with parents or an adult in a young person's life becoming one of the first access points of alcohol, which may result in greater consumption long term (Clare et al., 2019; Kelly et al., 2016). Thus, depending on the young person's environment they might view alcohol as 'normal' and are more likely to be open to the message behind online advertisements.

Furthermore, Gallegos et al. (2021) found that a lack of emotional attachment to family and subjection to peer pressure increases the likelihood of early substance use among young individuals. Peer pressure can be present in environments such as universities, where drinking is a form of socialising and can lead to social and peer acceptance (Hepworth et al., 2016, p. 253; Supski et al., 2017, p. 232). This can be seen through participation in orientation activities and house parties, where drinking games may be involved (Corney & du Plessis, 2022, p. 413; Riordan et al., 2018, p. 1502). However, such games can lead to excessive drinking due to desiring social conformity, a sense of community, and achieving a state of drunkenness (George et al., 2023, p. 424).

Additionally, young people entering the workplace may be influenced by the frequency of alcohol use by the workplace culture. Research about workplace alcohol use (Pidd & Roche, 2013, p. 17) indicated the association between social norms in the workplace and alcohol

consumption patterns. Young people are at high risk of exposure to colleagues' alcohol use and after-work socialisation and peer pressure to force them to use alcohol. It can be said that peer pressure is a contributing stress factor for young individuals towards their daily lives, thus leading to better appeals to alcohol advertising and an increased purchasing pattern. Moreover, interaction with alcohol advertisements such as 'liking' or sharing with friends on social platforms (such as Instagram and Facebook) is another method of promotion for alcohol brands to appeal their product to young people.

Furthermore, other systems can impact a young adult. The macrosystem includes sectors such as government and political structures, societal customs and values, and socio-economic status. For instance, current and future policy changes to online alcohol advertising may impact the broader population of young people. Thus, the government's attitude towards alcohol is crucial in forming how young people perceive drinking and their participation in consuming alcohol as part of their lifestyle. Allowing the industry to be self-regulated indicates the lack of consideration by the government towards young people and their exposure to alcohol advertisements. In conclusion, the intersection of systems that act on a person's decision-making can shape their susceptibility to online advertising.

### Erik Erikson's 8 Stages of psychosocial development

Erik Erikson's 8 Stages of Psychosocial Development consist of multiple stages, each leading to a distinct identity crisis. The theory outlines the eight stages of psychosocial development that individuals progress through from birth until death (Douvan, 1997, p. 17). This research mainly focuses on stages 5 and 6, as the research target is young adults aged 14-24. Stage 5 covers the ages 13-19, and Stage 6 covers the ages 20–40. These stages are critical to an individual's developing relationship with alcohol as this is when a young people's experiences can define their lifetime relationship with alcohol.

Stage 5, identity versus role confusion, happens during one's adolescent years (ages 13–19). It emphasises the successful development of a distinct identity, independence, and the importance of continued support and heartening from others. At this stage, adolescents begin to feel uncomfortable and insecure about their identity and future direction and strive to fit into society (McLeod, 2023). Success in this stage leads to the development of a good sense of identity and positive habits, while failure leads to confused identity roles and sees young people more easily affected by the systems surrounding them (Okunev, 2022, p. 52). In this stage, teens may analyse different roles, activities, and manners and they may need to learn from their friends' behaviours, values, and interests (Batra, 2013, p. 266). In that sense, teenagers who fall into role confusion may be more liable to be influenced by the messages in alcohol advertisements and have a higher risk of using alcohol. Targeted advertising is more detrimental to adolescents in this stage of their development and carries a higher risk of causing alcohol use in the short term and dependency in future. Thus, if we are to reduce early engagement with alcohol, responsible online alcohol advertising is needed which does not target young people's social and environmental vulnerabilities or specifically market to adolescent individuals or sub-groups.

Additionally, stage 6 (intimacy versus isolation) is a period during young adulthood (ages 20–40 years) where individuals may experience an identity crisis about intimacy vs isolation, with the associated virtue being love (Maree, 2021, p. 1111). During this stage, young people attempt to build and maintain meaningful relationships with both lifelong partners and non-family members. However, online alcohol advertising tends to convey messages about alcohol being beneficial to mood, social success, love, and rapport building and maintaining, which may give an illusion to young people that alcohol use can help them meet their needs for building intimacy.

The screenshots below provide evidence to support this assertion. Screenshot E shows a Cupid holding a beer with a text displaying 'enjoy the one for you'. The design of screenshot



E emphasises the feelings of emotion and utilises warm and romantic colours that may cause young adults to associate the brand with the idea of love. Moreover, screenshots F and G show some friends drinking beer while participating in social activities. The advertisement uses optimistic words such as 'cheers' and 'magnificently', which creates a positive message about alcohol and the brand. The wording and illustrations may provide young adults with the false sense that alcohol consumption can improve one's psychological well-being and lead to good social outcomes.

### Vulnerable groups

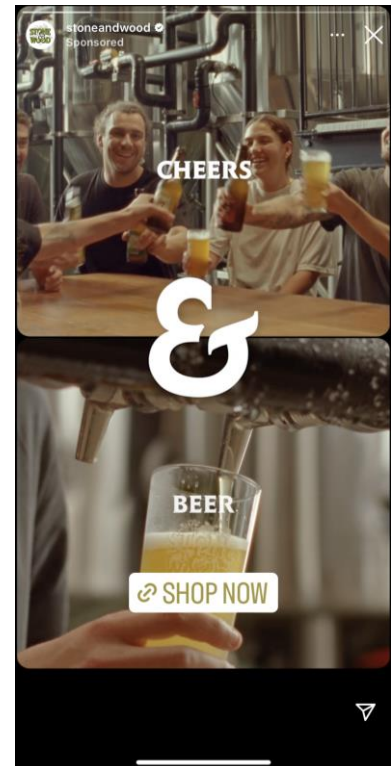
It is important to acknowledge that individuals and communities may have many intersecting factors that contribute to their experiences with alcohol use and their perspective on online advertising. For example, being Aboriginal or Torres Strait Islander or from a culturally and linguistically diverse (CALD) background in Australia may shape a young person's social determinants such as lack of appropriate healthcare, lower financial standing, family breakdown, lack of education, and difference in culture. This may be due to the discrimination and oppression Aboriginal and CALD individuals often face when interacting day to day (Filia et al., 2022, p. 248). In turn, these may lead to the possibility of increased alcohol intake (Mwanri & Mude, 2021). It can be said that young Aboriginal and CALD individuals may be more vulnerable to online alcohol advertising. However, alcohol advertising is a systemic issue, and vulnerable communities may be more negatively affected due to power imbalances within the system. Thus, measures must be developed to tackle both injustice and the social determinants of health and the false messages presented by alcohol companies and their advertising strategies.



*Little Creatures beer advertisement*

(Little Creatures Brewing, 2023)

Screenshot (E)



*Stone & Wood beer advertisement*

(Stone & Wood Brewing Co., 2023)

Screenshot (F)



*Tanqueray gin advertisement*

(Charles Tanqueray & Co., 2023)

Screenshot (G)

## Section 5: COVID-19 impacts

As highlighted before, COVID-19 has accelerated the evolution of the alcohol industry's engagement with online advertising. The ABS (as cited in AIHW, 2023) discovered a significant growth of 24% in alcohol sales from the period of March 2019 (\$999.3b) when compared to March 2020 (\$1,318.7b). However, a report by FARE (2020b) about alcohol use and harm during COVID-19 and a paper by the Australian Institute of Family Studies (AIFS) (2021, p. 5) indicated the overall decrease in young people's alcohol consumption. However, alcohol brands are continuing to promote their online sales and home delivery service through online advertising. The report also mentions that within South Australia, there was a 15% increase in people who drank more during the pandemic and can also be seen by an increase of 4.2% in household alcohol expenditure from March 2019 to March 2020. It may be that whilst some people stopped drinking during the pandemic others increased their intake considerably.

While pre-COVID drinking patterns were not a factor reported in all surveys, previous studies on alcohol consumption after large-scale disasters have found that people who drank heavily before a disaster were more likely to increase their drinking following the disaster (Heslin et al., 2013). This includes people who may have had pre-existing alcohol disorders (such as dependence) in which it was most likely that they increased drinking post-disaster (North et al., 2011, p. 174).

As policies aimed to slow down the spread of COVID-19 were in place, young people were forced to stay at home: online schooling and working-from-home situations had separated them from everyday social interactions. The 2019 NDSHS (AIHW, 2020) indicated that young people aged between 18–25 alcohol consumption was decreasing during the COVID-19 period as they were not able to purchase alcohol outside the home, as pubs and clubs were closed or restricted the number of customers. However, in South Australia, where

restrictions were relatively loose during the pandemic, bottle shops and pubs continued to open for business. There was also a special licence established to allow for premises such as restaurants to sell alcohol as a part of takeaway deals. Because of this, transparency of the statistics for alcohol consumption is reduced.

During the COVID-19 pandemic, secondary supply became a concerning method for minors to access alcohol. It is legal for a parent and guardian to supply alcohol or give permission for another adult to provide alcohol to individuals under the age of 18 to use alcohol in private residences (Government of South Australia, 2023b; Liquor Licensing Act 1997). This may inadvertently expose adolescents to alcohol at an early stage and potentially lead to alcohol dependence and vulnerability.

Physical advertising resulted in restrictions on alcohol advertising during the COVID-19 pandemic such as reduced opening hours of bottle shops and people's time outside the home being reduced, meaning less exposure to static advertising. However, online ads removed the limitations of physical advertising during the period of COVID-19. There are multiple articles indicating that there was a notable increase in social platforms used during the lockdown period because people were interacting online as a way for them to socialise and work (Dahiya et al., 2021; Feldmann et al., 2020. Munasinghe et al., 2020). Thus, the internet provides a mechanism for alcohol brands to promote alcohol at all times. It can be said that when people are on the internet using social media, they are not able to stop seeing those ads. Caterina Giorgi, the CEO of FARE, mentions that (FARE, 2023b):

“If you want to stay away from a brick-and-mortar bottle shop, you can cross the street or take a different route. But on social media, there is no escape when alcohol companies are allowed to relentlessly market their addictive products to people at the highest risk of harm.”

When online young people may have no way to escape from alcohol marketing and this may eventually lead them into a high risk of alcohol consumption.

With access to physical stores limited, social gatherings restrictions, and pubs and bars being inaccessible, many young adults had to change their drinking patterns (Callinan et al., 2020, p. 1387). However, through online alcohol websites and delivery apps, they were still able to purchase alcohol. Alcohol home delivery advertising such as Jimmy Brings and Boozebud allows people, particularly young adults, to get alcohol at home. The household delivery ads emphasise 30-minute delivery and encourage people to purchase substantial amounts of alcohol (see screenshot H) increasing the likelihood of overconsumption. This was a useful strategy for alcohol marketers in the lockdown period to maintain sales while people were restricted to staying at home and access to purchase alcohol in physical bottle shops was limited. Below is a screenshot from a video ad released in the COVID-19 period by Jimmy Brings (see screenshot I) which includes the slogan 'Don't leave the game to grab drinks! Let Jimmy take care of it..' The ads promote bulk buying (24 bottles) and promote the necessity of alcohol at parties and may contribute to the alcohol use of young people during the pandemic.



*Jimmy Brings promotional advertising #1*

(Jimmy Brings, 2023b)

Screenshot (H)

*Jimmy Brings promotional advertising #2*

(Jimmy Brings, 2023c)

Screenshot (I)



## Section 6: Conclusion and recommendations

### Conclusion

The regulatory systems of both alcohol licensing and promotion of alcohol in advertising in Australia require reform. Young people should not be subjected to predatory advertising about alcohol. Their long-term physical and mental well-being should be considered when brands design their online marketing strategies and ensure they do not explicitly target this cohort. This report finds that the government must be involved in developing a better method of holding the industry and its stakeholders accountable for its actions. This should include legislation and regulatory changes that enhance the role of government and advertising standards bodies and empower them to make enforceable decisions, with penalties that reflect the harm done by inappropriate online advertising. Furthermore, online spaces must go through mandatory screenings and have safety measures put in place to make sure that young adults and younger people are not exposed to harmful messages about alcohol. Overall, stronger regulation around online alcohol advertising will lead to less harmful outcomes for young individuals and a healthier relationship with alcohol.

### Recommendation for policy changes

#### Involve relevant professionals and public input

There is an urgent need to enhance and facilitate public participation in the setting of alcohol advertising standards, including in the online space. This should include the involvement of relevant professionals such as drug and alcohol experts, researchers, medical professionals, individuals who have lived experience, and social workers. Professional participation in the proposed system enhances the credibility and quality of the decision-making in the alcohol advertising space. The system should also include the voices of young people in decisions about advertising standards. Public engagement, especially with young people, can improve

diversity and transparency in the system and lead to better accommodating public health interests. A more diverse engagement can challenge the existing power dynamic that is heavily in favour of alcohol advertisers and create a balance between different interests.

#### Strengthen regulations regarding alcohol delivery services

Home delivery and particularly rapid home delivery is closely tied to online advertising. Many alcohol retailers are now relying on their 'online' premises and licences to increase sales including sales to younger people. The government must enact regulations restricting advertisers from emphasising the speed of delivery services and promotions that attract young people and encourage them to consume more alcohol in their ads. Furthermore, a verified ID system is required that ensures that sales are not made to people under the age of 18. Age verification details must be implemented online at the time of order and purchase and must be presented by the customer to the delivery person before receiving their purchase.

#### Age verification for online sites

Websites selling alcohol must be set up with an effective age verification process to ensure that potential customers are not under 18. There are systems where retailers can require users to photograph themselves holding a valid ID before allowing the customer to proceed with their purchase. While some people may be able to circumvent such systems, they would reduce the level of underage purchasing.

#### Implementation of warning signs

There is a need for the enforcement of warning signs on alcohol products, retailer and company websites, and online marketing schemes. Advertisers must show warning signs in their advertising that emphasise the risks of drinking alcohol, including that alcohol causes

cancer, can harm the developing child during pregnancy, and the consequences of illegal drinking and purchasing if the buyer is under 18.

#### Penalties for companies

Strict financial penalties must be directed towards retailers and companies that fail to comply with the revised codes and guidelines set by ABAC and Ad Standards (AU). Currently, alcohol advertising is self-regulated by the industry, but it has proven to be ineffective. A financial penalty may lead to more companies approaching their marketing with more accountability, and redirecting blame away from consumers and third parties (e.g., delivery drivers).

#### Stronger compliance check

There is a need for stricter and regular compliance checks on alcohol retailers and companies regarding their online advertisements. There is a need to expand the current monitoring and compliance systems established by the government to allow for systemic checking of online purchases. This would include test purchasing regularly. Repeated offences will result in penalties, seizure of the site, or termination of the service.



# Limitations to the project

- As we are students, we are not experts in alcohol advertising regulation and legislation review. We are not able to provide an in-deep law and regulation analysis. Therefore, a detailed outline of potential penalties is not included in our recommendations.
- Due to restrictions related to Human Research Ethics we were unable to interview people directly. The nature of desktop-based projects limited our findings. We were not able to get first-hand material to enhance the accuracy and credibility of the report.
- Second-hand resources were limited to what was available online, thus some materials such as government statistics and reports from self-regulatory organisations had not been updated recently and may not reflect on the current situation.

# Glossary

Acronym	Full name
AANA	Australian Association of National Advertisers
ABAC	The Alcohol Beverages Advertising Code
ABS	Australian Bureau of Statistics
AIFS	Australian Institute of Family Studies
AIHW	Australian Institute of Health and Welfare
ANZA	Association of New Zealand Advertisers
ASA (NZ)	Advertising Standards Authority New Zealand
ASA (UK)	Advertising Standards Authority United Kingdom
ASCB	Advertising Standards Complaints Board
ASSAD	Australian Secondary Students Alcohol and Drug
BWS	Beer, Wine, and Spirits
CALD	Culturally and Linguistically Diverse
CAP	The Committee of Advertising Practice
CAPS	Children's Advertising Code Pre-vetting Service
COC	Community Outreach Centre
CRTC	Canadian Radio-television and Telecommunications Commission

DHAC	Department of Health and Aged Care
FARE	Foundation for Alcohol Research & Education
LAPPS	Liquor Advertising and Promotion Pre-vetting Service
NDSHS	National Drug Strategy Household Survey
SANDAS	South Australian Network of Drug and Alcohol
UGC	User-Generated Content
UniSA	University of South Australia

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