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Joint Select Committee on Social Media and Australian Society
PO Box 6100
Parliament House
Canberra ACT 2600
socialmedia.joint@aph.gov.au

Joint Select Committee on Social Media and Australian Society

Dear Committee,

We welcome the opportunity to provide a submission to the Joint Select Committee on Social Media and Australian Society inquiry into the influence and impacts of social media on Australian society.

Every Australian should be able to grow up and live in an environment that supports their health and wellbeing. Yet our community is constantly bombarded with promotions for alcohol, including on social media. Alcohol companies advertise relentlessly through a wide range of media, using sophisticated technology to target people with marketing for their products. Higher standards and regulation for how unhealthy products are marketed on digital platforms, including social media, are urgently needed to better protect the community.

Our response focuses on the harms to Australian society because of digital alcohol marketing practices, including on social media. It also encompasses the opportunities to harness the power of social media to spread evidence-informed messages about the harms caused by alcohol, to empower the Australian Community.

Our response addresses the following terms of reference:

- (c) the important role of Australian journalism, news and public interest media in countering mis and disinformation on digital platforms;
- (d) the algorithms, recommender systems and corporate decision making of digital platforms in influencing what Australians see, and the impacts of this on mental health;
- (e) other issues in relation to harmful or illegal content disseminated over social media, including scams, age-restricted content, child sexual abuse and violent extremist material; and
- (f) any related matters.

About Alcohol Change Australia.

Alcohol Change Australia is a group of health and community organisations working together to improve the health and wellbeing of the Australian community. Alcohol Change Australia encourages policy change to prevent and reduce alcohol harm in Australia. Further information on Alcohol Change Australia, including our members and policy priorities, can be found on our website at www.alcoholchangeaus.org.au.

Alcohol causes significant levels of harm to the Australian community.

Alcohol takes a significant toll on our communities, fuelling violence, injuries, and deaths. Every day, 15 people die from alcohol-related harm in Australia.¹ In 2018, alcohol contributed to 4.5% of the total burden of disease and 15% of the overall burden of injury.² Alcohol use is causally linked to over 200 disease and injury conditions,³ and causes at least seven types of cancer.⁴ Some of those most at harm from alcohol include children and young people, unborn babies, those living in rural and remote areas, and people living with mental health conditions. There is a complex relationship between mental health and alcohol.² Alcohol intake is associated with mental health issues and is a risk factor for suicide.⁵

Alcohol marketing on digital platforms is causing harm.

The expansion of digital platforms has given the alcohol industry the opportunity to market products in ways that are highly targeted, time-relevant, and interactive. Alcohol companies bombard the Australian community with 40,000 alcohol ads a year on Facebook and Instagram alone.⁶ The extensive amounts of personal data used in digital marketing allows alcohol companies to profile and target people based on particular behaviours and characteristics. Algorithms developed by digital platforms allow the alcohol industry to specifically target heavy users of alcohol at the same time as recruiting new consumers in a range of markets and demographics.⁷ Online tracking, profiling, and data collection enables harmful marketing of alcohol.

Concerningly the marketing of harmful products does not only target adults. Digital platforms collect the data of children and young people for marketing purposes, with technology companies collecting over 72 million data points on a child by the time they are 13 years old.⁸ Meta has been found to have flagged children as being 'interested' in harmful products, including alcohol.⁹ It has also been reported to use personal data collected to create profiles of young people with harmful or risky interests, including 13- to 17-year-olds interested in alcohol, smoking, and gambling.¹⁰ Furthermore, Meta has allowed advertisers to buy access to the data of young people profiled as having harmful interests.¹⁰ This is just a snapshot of some of the harmful marketing practices that occur on digital

¹ Lensvelt E, Gimore W, Liang W, Sher A, Chikritzhs T. Estimated alcohol-attributable deaths and hospitalisations in Australia 2004 to 2015. National Alcohol Indicators, Bulletin 16. 2018. Perth: National Drug Research Institute, Curtin University.

² Australian Institute of Health and Welfare. Alcohol, tobacco & other drugs in Australia, Health impacts - Australian Institute of Health and Welfare. December 2022. Available from: <https://www.aihw.gov.au/reports/phe/221/alcohol-tobacco-other-drugs-australia/contents/impacts/health-impacts>

³ Rehm J, Gmel GE Sr, Gmel G, Hasan OSM, Imtiaz S, Popova S, Probst C, Roerecke M, Room R, Samokhvalov AV, Shield KD, Shuper PA. The relationship between different dimensions of alcohol use and the burden of disease—An update. *Addiction*. 2017;112(6):968-1001

⁴ Bagnardi V, Rota M, Botteri E, Tramacere I, Islami F, Fedirko V, Scotti L, Jenab M, Turati F, Pasquali E, Pelucchi C, Galeone C, Bellocco R, Negri E, Corrao G, Boffetta P, La Vecchia C. Alcohol consumption and site-specific cancer risk: a comprehensive dose-response meta-analysis. *Br J Cancer*. 2015 Feb 3;112(3):580-93.

⁵ Australian Government Department of Health and Aged Care. What are the effects of alcohol? August 2022. Available from: <https://www.health.gov.au/topics/alcohol/about-alcohol/what-are-the-effects-of-alcohol>

⁶ Hayden L, Brownbill A, Angus D, Carah N, Tan XY, Dobson A, Robards B. Alcohol advertising on social media platforms – A 1-year snapshot. Canberra: Foundation for Alcohol Research and Education, 2023 Mar.

⁷ Norman T, Anderson-Luxford D, O'Brien P, Room R. Regulating alcohol advertising for public health and welfare in the age of digital marketing: challenges and options. *Drugs: Educ. Prev. Policy*. 2022

⁸ Collins D. How much data do adtech companies collect on kids before they turn 13? *Superawesome*2017. Available from: <https://www.superawesome.com/blog/how-much-data-do-adtech-companies-collect-on-kids-before-they-turn-13/>

⁹ Hern A, Ledergaard F. Children 'interested in' gambling and alcohol, according to Facebook. *The Guardian UK*. 2019 Oct 10. Available from: <https://www.theguardian.com/technology/2019/oct/09/children-interested-in-gambling-and-alcohol-facebook>

¹⁰ Williams D, McIntosh A, Farthing R. Profiling children for advertising: Facebook's monetisation of young people's personal data. Sydney: Reset Australia, 2021.

platforms. The lack of transparency and visibility of online marketing means the true extent of harms is unknown.

The health, wellbeing and online safety of children, individuals and the community should be protected above the profits of online service providers and companies selling harmful products. However, right now, online marketing benefits digital platforms and the alcohol and advertising industries. This is coming at a cost to the community. A recent study found that when online, children and teenagers are being targeted by advertising of unhealthy products, including alcohol.¹¹ The more children and young people are exposed to alcohol advertising, the more likely they are to start using alcohol products at a younger age, and to drink more if they are already using alcohol.¹² This impact is seen with digital marketing, with young people's exposure to alcohol marketing online linked to increased alcohol use.¹³ Research has found 'liking' or following alcohol marketing pages on social media is associated with riskier alcohol use among young Australians.¹⁴

The constant flow of pro-alcohol messages is confronting and difficult for people with lived experience of alcohol harm. Unfortunately the collection of personal data means that the people most likely to be targeted with advertising for alcohol and other harmful products are often the people most harmed by these products, such as people experiencing dependence.¹⁵ A recent survey of Australians who were trying to reduce or stop their use of unhealthy products found 83% agreed or strongly agreed that digital marketing makes it more difficult for them to reduce their use of alcohol, gambling, and unhealthy foods. Almost 9 in 10 people would prefer to see less or no online marketing for alcohol.¹⁶

Reforms are urgently needed to better protect the community.

Regulatory approaches have not kept pace with the increased sophistication and diversity of modern alcohol marketing, including on social media. Australia continues to rely on voluntary, industry-managed codes and practices for managing alcohol marketing. Research has consistently shown the self-regulatory system is inadequate, ineffective, and lacks transparency and accountability.¹⁷ Existing codes do not adequately restrict alcohol companies from marketing on digital platforms that are used by children, and there are few rules limiting how companies can use data for marketing purposes, including the collection and use of children's data. The system does little to reduce community exposure to alcohol marketing and is failing to protect people's health.

The Australian Government has the opportunity to introduce higher standards for how the alcohol industry markets and sells its products, including via social media. We need regulatory systems that

¹¹ Deakin University. #DigitalYouth How children and young people are targeted with harmful product marketing online. 2024. Available from: <https://iht.deakin.edu.au/wp-content/uploads/sites/153/2024/06/Digital-Youth-brief-Final-2.pdf>

¹² Jernigan D, Noel J, Landon J, Thornton N, Lobstein T. Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. *Addiction*. 2017; 112 Suppl 1: 7-20.

¹³ Noel, J, Babor, T, & Robaina, K. Industry self-regulation of alcohol marketing: a systematic review of content and exposure research. *Addiction*. 2017;112(Suppl 1), 28-50.

¹⁴ Carrotte E, Dietze P, Wright C, Lim M. Who 'likes' alcohol? Young Australians' engagement with alcohol marketing via social media and related alcohol consumption patterns. *Aust NZ J Public Health*. 2016; 40(5):474-497.

¹⁵ World Health Organization. Reducing the harm from alcohol by regulating cross-border alcohol marketing, advertising and promotion: a technical report. Geneva: World Health Organization; 2022. Available from: <https://www.who.int/publications/i/item/9789240046504>

¹⁶ Foundation for Alcohol Research and Education and VicHealth. Experiences with online marketing of alcohol, gambling, and unhealthy food: A survey. January 2023. Available from: <https://fare.org.au/experiences-with-online-marketing-of-alcohol-gambling-and-unhealthy-food-a-survey/>

¹⁷ Reeve B. Regulation of alcohol advertising in Australia: Does the ABAC Scheme adequately protect young people from marketing of alcoholic beverages? *QUT Law Review*. 2018;18(1):96-123.

ensure safe and healthy environments for everyone, especially for children and other Australians most at risk from harm.

Use of social media to share health promoting messages.

Social media is a powerful mechanism to share evidence-based health messages. Australians have a right to know if the products they are using can cause them harm. However, many people in the community are not aware of the range and magnitude of the harms caused by alcoholic products.^{18,19,20} We recently released a report that highlighted that less than half of Australians were aware that alcohol could cause cancer.²¹ Social media provides a platform to raise awareness of the harms caused by alcohol, to empower the Australian society to make informed decisions for their health and wellbeing.

Australia is a world leader in tobacco control and the decades of tobacco control action in our country have demonstrated how combining effective public health-focused policies with strong public education campaigns can help change social norms. Unfortunately, compared to smoking, Australian governments have invested far less in public education campaigns to help increase awareness of alcohol harms. Campaigns that highlight the harms caused by alcohol have been effective in changing knowledge, attitudes, and beliefs about alcohol. For example, the Western Australian Mental Health Commission has run ongoing mass media campaigns to inform the public of alcohol harms and to promote the NHMRC alcohol guidelines to reduce risks from alcohol. These campaigns have increased understanding of the link between alcohol products and cancer, and have ranked among the most effective advertisements in the world for motivating people who drink alcohol to reduce their alcohol use.^{22,23}

We know Australians are currently being flooded with marketing of alcohol products, including on social media. Instead, Australians need to see more health messages that show the true impact of the harms caused by alcohol. There is strong public support for education campaigns with two-thirds of Australians believing there should be public education campaigns about alcohol-related harms.²⁴

¹⁸ Foundation for Alcohol Research and Education. 2020 Annual Alcohol Poll: Attitudes and Behaviours. Foundation for Alcohol Research and Education; 2020. Available from: <https://fare.org.au/wp-content/uploads/ALCPOLL-2020.pdf>

¹⁹ Coomber K, Mayshak R, Curtis A, Miller PG. Awareness and correlates of short-term and long-term consequences of alcohol use among Australian drinkers. *Aust N Z J Public Health*. 2017;41(3):237-42.

²⁰ Bowden JA, Delfabbro P, Room R, Miller CL, Wilson C. Alcohol consumption and NHMRC guidelines: has the message got out, are people conforming and are they aware that alcohol causes cancer? *Aust N Z J Public Health*. 2014;38(1):66- 72.

²¹ Alcohol Change Australia. In the dark about alcohol harms: Australians' knowledge of alcohol and cancer. May 2024. Available from: <https://alcoholchangeaus.org.au/wp-content/uploads/2024/06/Alcohol-and-cancer-poll-summary-FINAL-MAY-2024.pdf>

²² Dixon H, Pratt IS, Scully M, et al. Using a mass media campaign to raise women's awareness of the link between alcohol and cancer: cross-sectional pre-intervention and postintervention evaluation surveys. *BMJ Open*. 2015;5(3).

²³ Wakefield M, Brennan E, Dunstone K, et al. Features of alcohol harm reduction advertisements that most motivate reduced drinking among adults: an advertisement response study. *BMJ Open*. 2017;7(4).

²⁴ Dekker M, Jones A, Maulik P, Pettigrew S. Public support for alcohol control initiatives across seven countries. *Int J Drug Policy*. 2020;82.

Recommendations

We strongly recommend the Australian Government implement the following recommendations to protect Australians from harm caused by alcohol:

- Introduce a regulatory framework with legislative basis that effectively protects the community from exposure to alcohol marketing, including on social media.
- Prohibit the collection, use and disclosure of children’s data for commercial purposes (including the profiling, monitoring, tracking, and targeting).
- Substantially invest in the development and implementation of evidence-based, targeted, and ongoing campaigns and preventative programs, including through social media, that increase awareness of alcohol harms and the NHMRC Australian guidelines to reduce health risks from drinking alcohol.

Thank you once again for the opportunity to contribute to this inquiry. Any questions regarding our submission, please contact Natalie Stapleton, Executive Officer – Alcohol Change Australia, at natalie.stapleton@adf.org.au.

Yours sincerely,

Dr Erin Lalor
Chair, Alcohol Change Australia

Natalie Stapleton
Executive Officer, Alcohol Change Australia