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Dear Taskforce Members,

The purpose of this letter is to provide comment on the discussion papers issued by the National Preventative Health Taskforce in particular:

[Technical Report No 1
Obesity in Australia: a need for urgent action](#)

and

[Technical Report No 3
Preventing Alcohol-related Harm in Australia: a window of opportunity.](#)

The [Australian Publishers' Bureau \(APB\)](#) is an association of Australia's major newspaper and magazine publishers which was established 30 years ago to provide a united voice for publishers on issues affecting the industry as a whole. It is the pre-eminent industry Advisory Body on matters relating to advertising. The Bureau provides advice to its publisher members and their constituent publications, on legal and other issues affecting advertising.

Until the end of 1996, when the advertising industry's system of regulation ceased, its principal role was to pre-clear for publishers, advertisers and their agencies, all print advertisements covered by particular product based advertising codes, such as the Therapeutic Goods Advertising Code, Slimming Advertising Code and the Alcoholic Beverages Advertising Code.

Essentially, it was the Bureau's duty to ensure that such advertisements conformed to the provisions of the relevant advertising codes. Where they did conform, they were required to include an [APB](#) approval number when published; where they did not conform they were rejected, and were not permitted to be published until revised to the Bureau's satisfaction. This system provided a high level of protection for everyone, including publishers.

We maintain a cordial and professional relationship with the various Departments of Fair Trading across the country and also with the Australian Competition & Consumer Commission. The [APB](#) is recognised by the Commission as the representative industry association for newspaper and magazine publishers on all advertising and related matters.

The ACCC has referred to the Bureau as "a model of industry co-operation".

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"To promote, protect and further the interests of its publisher members; to encourage high standards of advertising service and to provide an advisory service and reference point for its members on industry regulation and advertising matters."

At the **APB** we pride ourselves on our extensive knowledge of the estimated 160 pieces of Commonwealth, State and Territory legislation, which include requirements on advertising, as well as various industry sector and professional Codes of Practice/Ethics, along with publishers' legal obligations under the Trade Practices Act 1974 and the various Fair Trading Acts.

Technical Report No 1, Obesity in Australia: a need for urgent action

The **Australian Publishers' Bureau** shares the concerns of all Governments and society in relation to the significant issue of obesity facing not just children, but also adults within our community, the health system and the socio-economic future of Australia.

In general, advertising in Australia is already well regulated by a combination of regulation, co-regulation and self-regulation.

In particular, the Children's Television Standards administered by Australian Communications and Media Authority (ACMA); the Commercial Television Industry Code of Practice administered by Free TV; the Australian Association of National Advertisers' (AANA) Code for Advertising & Marketing Communications to Children administered on behalf of the AANA by the Advertising Standards Bureau (ASB), all of which provide protection of children's interests and the community.

The ASB administers a national system of advertising self-regulation through the Advertising Standards Board and the Advertising Claims Board. The self-regulation system recognises that advertisers share a common interest in promoting consumer confidence in, and respect for, general standards of advertising.

Participation by the ASB in established international bodies ensures Australia is at the forefront of best practice, ensuring that advertising standards are both robust and coherent from market to market for the benefit of industry and consumers worldwide.

A free public service of complaint resolution is provided by the ASB. It provides determinations on complaints about most forms of advertising in relation to issues including the use of language, the discriminatory portrayal of people, concern for children, portrayals of violence, sex, sexuality and nudity, and health and safety.

Indicative of the ASB's pro-active approach to world's best practice, it has conducted research into the Board's decisions to ensure that they are in line with prevailing community standards on advertising in Australia. Although many other countries support advertising self regulatory systems, none have tested their Board's decisions against the views of their community.ⁱ

It should be noted that Australia has led the world in the protection of the consumers and in prevailing community standards.

Whilst we must do all we are able to minimise the rate of obesity, in particular that of our children, the approach to a blanket ban of television advertising appears to be a "quick fix" approach, which is limited in its effectiveness.

Frontier Economics, international researchers found;

"Prohibiting TV ads for foods high in fat, salt and sugar (HFSS) looks like an easy policy response to the growing obesity problem in the UK and other developed economies. However, a wide range of studies of the impact of similar bans, notably on alcohol ads, indicate that they are ineffective in reducing harmful consumption and may even have perverse effects."ⁱⁱ

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Dr Jeffrey Brand of Bond University in a review entitled "Television Advertising to Children, A review of contemporary research on the influence of television advertising directed to children" ascertains that:

"public health literature points to a range of multi-factorial contributors to obesity, including hereditary, environmental, social and cultural factors."ⁱⁱⁱ

The Queensland Health's own web page entitled "Junk food advertising on children's television; Have your say" states "Parents, of course, have the most influence over what their children eat."^{iv}

Children now have the opportunity to access and experience a number of "entertainment" options such as six dedicated children's channels, along with other channels which have general viewing appropriate for children on Pay TV, DVDs, computer games and digital media players. These other mediums have taken the place of free-to-air television resulting in a decrease of children's viewing habits on free-to-air television.

A more cohesive approach to the problem of obesity is a collective response, Government, the community and industry working together.

To that end the AANA created the "Jo Lively", a \$10 million campaign based on the theme "Eat Well. Play Well. Live Well". The campaign, spearheaded by the character Jo Lively, was chosen for a well-researched ability to promote key messages of a balanced lifestyle in ways young children and adolescents are able to relate to.

Global companies have markedly reduced the amount of advertising directed to children and have introduced healthy alternatives. Kellogg's announced last year that they would only promote healthy products to children.^v

There has been no substantive evidence to demonstrate that placing bans on advertising of specific products will reduce the obesity rates within our community.

In fact the ban could have an adverse impact on the production of programming material specifically for children. This has been evidenced in the United Kingdom after the introduction of restrictions by Ofcom on the advertising of foods high in fat, salt and sugars.

These requirements (which have already been amended to allow advertising of some dairy products) came into effect in February 2007.

Resultant reports have shown detrimental cuts to children's programming of approximately £30 million pounds by ITV with the commissioning of children's programmes shrinking dramatically. The contention that food and beverage advertising is a significant cause of the increasing level of obesity in children is not demonstrated.^{vi}

The ACMA Issues Paper also references the fact that no direct link has been established between advertising and obesity.

By its own analysis ACMA concedes that the "factors influencing childhood obesity and overweight are complex, with public health literature identifying a range of actors, including the interplay of hereditary, social, cultural and environmental factors and that it is difficult to determine the relative contribution of advertising amongst this mix."^{vii}

Also the influence of advertising, if there is any at all, on levels of obesity is small and obesity is rather driven by parental, sibling, peer, taste, price and other major societal influences.

The Taskforce Discussion Paper puts forward the premise to “Curb inappropriate advertising and promotion, including consideration of banning advertising of energy-dense, nutrient-poor foods on free-to-air television during children’s viewing hours (i.e. between the hours of 6.00am and 9.00pm), and reducing or removing such advertising in other media such as print, internet, radio, in-store and via mobile telephone”.

However the Paper does not provide a definitive definition on “energy dense” or “nutrient poor” both of which are very subjective descriptions.

The profiling system developed by Mike Raynor is the model used by Ofcom for determining which products may be advertised to children in the UK. This model has been used to build the model adopted by Food Standards Australia New Zealand (FSANZ).

The FSANZ system is more transparent and an on-line calculator can be readily accessed by consumers to determine the “health” status of a particular food. The system provides a level playing field for the “scoring” of food and beverages with a different tally of points (ie a pass mark) gained for different products according to type ie. drinks, foods, dairy and edible oil products.

Negative points are given for energy, saturated fat, sugar and salt and positive points are awarded for protein, fibre and fruit and vegetables.

There are a number of other food profiling systems; NSW Health has developed a model for usage by school canteens which has been adopted with individual variations by a number of other States, naturally as a consequence this has led to a number anomalies and contradictions.

In a study^{viii} funded by NSW Health a survey was conducted of food advertisements within 500 metres of 40 Sydney primary schools. Advertised foods were categorised into ‘Core and healthy’, ‘Non-core and unhealthy’ and Miscellaneous (tea and coffee).

In categorising the foods the researchers did not use the NSW Health model but ‘a food classification system developed to align with The Australian Guide to Healthy Eating”.

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The criteria used by the study (conducted academics associated with the NSW Centre for Overweight and Obesity, School of Public Health, University of Sydney) categorised all foods, regardless of nutrient profile, sold in fast food restaurants as non-core/unhealthy and also named Subway.

These separate systems, when compared with each other demonstrate that there would be varying anomalies with a range of foods being classified as ‘unhealthy’ and banned from advertising, while at the same time similar products are deemed ‘healthy’ by other authorities.

Any nutrient profiling system must be consistent and accepted by all participants and across all jurisdictions. Whether it is possible to design such a system, which has eluded policymakers worldwide is a question that needs to be considered before any decisions are made and outcomes implemented.

For every study or paper expressing one point of view there is another one which will refute the claims made. This should not be about one study or another or, how many each side of the argument may produce; it is not a case of right or wrong or of industry abrogating its responsibility. It is all about ensuring an effective response to a major health issue for all Australians.

The **APB** agrees with South Australian Health when it states:

“To succeed in solving this problem, it is important that society recognises, owns and addresses the issue collaboratively. It requires personal responsibility, as well as action amongst individuals, families, communities, teachers, clinicians, industries and local, state and national governments to be a part of the solution.”^{ix}

The **APB** wishes to articulate an alternative approach which recommends that all contributors in the debate work together.

To develop a multifaceted approach to delivering messages that promote a healthy lifestyle and healthy food choices and to raise the awareness amongst all in the community, not just children, on the importance these choices have on their health, well being and lifestyle.

Education is the key to addressing the obesity issue. Not just for children but for adults as well, particularly given the already stated contributors to obesity, ie genetic, ecological, societal and cultural factors.

Banning advertisements is a simplistic approach to a complex problem. The **APB** advocates a more proactive approach, such as:

- promoting healthy choices;
- healthy eating habits included in the physical education curriculum;
- fruit breaks at school;
- targeted community services announcements;
- visits to schools by successful role models (chosen from all walks of life for their healthy lifestyle choices);
- arranging award sponsorship with local fruit and vegetable markets;
- holding regular farmers markets;
- school workshops involving parents; and
- schools adopting a farm which produces fresh food which would include a field trip to visit.

The **APB** also suggests that a national working party of all interested parties be established to audit programmes which are already conducted by various regulatory authorities in each of the States and Territories. There are also many successful community and school programmes and initiatives currently being undertaken.

The most successful of these programmes could then be implemented as a cohesive national response.

The Australian Food & Grocery Council has also announced an industry response.

The **APB** also believes that the Australian Food and Beverage Industry’s development of The Responsible Children’s Marketing Initiative demonstrates its Members’ commitment to responsible marketing of foods and beverages to children. The goal of this initiative is to ensure that a high level of social responsibility in marketing communication and marketing food and beverage products in Australia is maintained.

The Australian Food & Grocery Council states:

“In developing the initiative, the industry has set out clear expectations in the form, spirit and context of advertising to children. This will be a transparent process with signatories being required to develop and publish individual company action plans which will be subject to monitoring and review processes.

Companies participating in this initiative will publicly commit to marketing communications to primary school aged children (children under 12), only when it will further the goal of promoting healthy dietary choices and healthy lifestyles.

Each participant will develop, and publish, an individual company action plan that outlines how they will meet a set of core principles. These principles relate to:

- Advertising Messaging
- Use of Popular Personalities and Licensed Characters
- Product Placement
- Use of Products in Interactive Games
- Advertising in Schools
- Use of Premium Offers.^x

This initiative, developed in collaboration with the AANA as part of the system of advertising and marketing self-regulation in Australia, has the support of major food and beverage manufacturers, as well as other industry groups.

This should be considered to be a positive and proactive approach.

Advertising self regulation in Australia is working in practical terms, as can be seen by the efficiency and effectiveness of the regulatory models.

The respective codes which are in place are working successfully, providing protection for children from inappropriate material without resorting to measures which may be counterproductive. ACMA, Free TV and the ASB continue to monitor prevailing community standards and implement changes as issues of public concern arise.

Technical Report No 3, Preventing Alcohol-related Harm in Australia: a window of opportunity

There is no doubt that there is a minority of the population within our community that drinks to excess.

Amongst this group there are those who simply do not understand the implications of excessive alcohol consumption, there are those who simply refuse to believe that it has any affect on their behaviour or health, and there are those that have the wilful intention of embarking on a “drinking spree” accepting no responsibility for the consequences of their behaviour.

There are many debates and studies on the role of advertising as potential motivation of alcohol consumption and as a contributor to alcohol abuse none of which have proven conclusive.

Wikipedia states “Alcohol advertising along with tobacco advertising, it is one of the most highly-regulated forms of marketing”^{xi}. Australia certainly has a highly regulated system for the promotion of alcohol.

In Australia, each State and Territory has legislation which regulates the supply and consumption of liquor.

These Acts aims to contribute to minimising the harm arising from the misuse and abuse of alcohol by:

- providing adequate controls over the supply and consumption of liquor;

- ensuring as far as practicable that the supply of liquor contributes to, rather than detracting from the amenity of community life;
- facilitate the development of a diversity of licensed facilities reflecting community expectations; and
- contributes to the responsible development of the liquor and licensed hospitality industries.

The Acts provide penalties (including fines and licence suspension or cancellation) for failing to comply with licence conditions or other breaches of the Acts.

Along with the respective State and Territory legislation the Alcohol Beverages Advertising Code (ABAC) is the self-regulating advertising code of the Australian alcohol beverages industry.

The Preamble of the Code states:

“The Code is designed to ensure that alcohol advertising will be conducted in a manner which neither conflicts with nor detracts from the need for responsibility and moderation in liquor merchandising and consumption, and which does not encourage consumption by underage persons.

The conformity of an advertisement with this Code is to be assessed in terms of its probable impact upon a reasonable person within the class of persons to whom the advertisement is directed and other persons to whom the advertisement may be communicated, and taking its content as a whole”.

There have been a numerous studies conducted to ascertain the impact of advertising on consumption of alcohol and none have found a direct correlation between the two. A sample of studies are:

- The US Federal Trade Commission concluded in a study that there is "no reliable basis to conclude that alcohol advertising significantly affects consumption, let alone abuse." ^{xii}
- A report in the Congressional Record by a US Senate subcommittee stated that it could not find evidence to conclude that advertising influences non-drinkers to begin drinking or to increase consumption.^{xiii}
- The United States Department of Health and Human Services in its report to Congress concluded that there is no significant relationship between alcohol advertising and alcohol consumption. It did not recommend banning or imposing additional restrictions on advertising. ^{xiv}
- A University of Texas study of alcohol advertising over a 21-year period found that the amount of money spent on alcohol ads had little relationship with total consumption in the population.^{xv}
- Studies in both Canada and the United States find no significant link between restrictions on advertising and alcohol consumption.^{xvi}
- The founding Director of the National Institute on Alcohol Abuse and Alcoholism stated: "There is not a single study - not one study in the United States or internationally - that credibly connects advertising with an increase in alcohol use or abuse."^{xvii}

Reviews of international research have indicated that there is no influence by advertising on the consumption of alcohol or its misuse.

Advertising does not increase consumption. For example, alcohol brand advertising was first introduced in New Zealand in 1992. While advertising continues to increase, consumption continues to fall.^{xviii}

Alcohol is a "mature" product category in that consumers are already aware of the product and its basic characteristics. Therefore, overall consumption is not affected significantly by advertising specific brands.

The purpose of advertising is to create brand allegiance or to persuade consumers to "switch" their brand loyalty to another, rather than increasing expenditure.

For this reason, advertisers focus their efforts on established consumers. They seek to strengthen the loyalty of their own consumers and induce other consumers to try their brand.

Jon Nelson states:

Is there a direct and material effect of advertising on the overall level of alcohol consumption or on alcohol abuse? The bulk of the scientific evidence presented in this survey indicates that the answer to this question is "No." Studies of state-level bans of billboards and publicly visible displays fail to demonstrate that selective bans reduce consumption.

Studies of international bans that cover more media and beverages reach the same conclusion for more comprehensive bans. Studies of advertising expenditures fail to find statistically significant effects of advertising on alcohol consumption, despite numerous advances in econometric methods.

Studies of brand advertising fail to establish a spillover effect of successful brand advertising on the marketwide demand for alcoholic beverages. These studies do find a direct effect of parents' drinking on such behavior, which can be incorporated into future studies of youth alcohol behaviors (see Cook & Moore, 2001).^{xix}

The Taskforces' Discussion Paper also states:

While some interventions are more effective than others, there is no single strategy that can offer a 'quick fix' or 'silver bullet' to the prevention of harmful consumption of alcohol.^{xx}

The Tobacco Advertising Prohibition Act 1992 has not prevented those in our community from taking up smoking. Whilst the number has been reduced there are still those who, knowing full well the associated health risks which can prove deadly, yet they still light a cigarette. During 2004 - 2005 in NSW alone there were 55,591 smoking-related hospital admissions.

In 1998 - 1999, the social costs of tobacco use in Australia were estimated to be \$21.1 billion, about 2.3% of the gross domestic product.^{xxi}

A holistic approach is needed in the circumvention of the misuse of alcohol. A whole system of beliefs needs to be analysed, rather than simply its individual components, the analysis needs to consider all of the physical, mental and social conditions.

Banning the advertising of the products does not resolve the issue for the need of an attitudinal change needed by those who misuse alcohol. We must ensure that we do not project the inappropriate behaviour of the minority onto the rest of society or allow them to dictate what is clearly unacceptable to the majority of the community.

There is a need to be more creative in our approach to promoting the right choices to the young.

The use of YouTube, Facebook, Myspace rather than traditional methodology would reach more young adults when promoting the message of harm minimisation and responsible consumption.

School visits by those that have been the victims of alcohol abuse and those that through their misuse of alcohol committed wrongdoing whether it be either be criminal or morally but have changed their lifestyle can more readily demonstrate the negatives of abuse and misuse.

Conclusion

There is no simple answer to address or resolve these issues, particularly when it involves the personal behaviour of individuals.

Critics of advertising want to reduce the social and medical problems associated with the misuse of alcohol and the issue of obesity by arguing the need for a ban on advertising. This policy choice is based on the assumptions that alcohol advertising increases alcohol misuse and the wrong food choices.

Banning a product or service can only serve to “glamorise” the use, it negates the serious potential harm it can cause. It is the “thrill” of using or for some, abusing it, which can be the attraction. Take the glamour away and make it ordinary and it’s not such a big deal. Otherwise we demonise the substance of alcohol rather than discouraging irresponsible behavior.

What matters is how it is used, and we must convey by word and example that the abuse of alcohol is never humorous, acceptable, or excusable.

Responsible attitudes toward alcohol are based on the understanding that such beverages are yet another part of life over which individuals have control, like exercise, personal hygiene, or diet.

In spite of the rhetoric and anecdotes, alcohol commercials do not cause young people to drink. The greatest influence of their beliefs, attitudes and behaviors are from their parents.

Parents are much more influential than they generally realize. Among six things that might affect their decisions about drinking, 62% of American youth aged 12 to 17 identified their parents as a leading influence:^{xxii}

- Parents (62 percent)
- Best friends (28 percent)
- Teachers (9 percent)
- What they see on television (7 percent)
- What they see in advertisements (4 percent)

It is parents, rather than alcohol advertisements, with the great influence over young people.

There is a large body of evidence which indicates that counter-advertising is a more productive and effective measure in decreasing alcohol consumption rather than introducing advertising restrictions as public policy.

The New Zealand Government and industry have developed the Food Accord to address the issue of obesity.

The premise of the Accord is the "reduction of obesity, improved nutrition and increased exercise". The Accord is administered by the Food Industry Group which includes the peak bodies including food and beverage manufacturers, supermarket chains, advertising agencies and the media.

Another study of alcohol advertising adds to the consensus among researchers that such ads do not increase alcohol consumption.

The research, by Dr. John P. Nelson of Pennsylvania State University and Dr. Douglas J. Young of Montana State University, involved analysis of empirical evidence about both nation-wide broadcast bans on alcohol advertising in developed countries and state-wide bans on alcohol ads on billboards. The study's "results call into question the efficacy of advertising bans."

These findings are consistent with the conclusions of virtually all other researchers on the effects of alcohol beverage advertising.^{xxiii}

Although alcohol advertising doesn't increase consumption, it continues because successful advertising permits producers to increase their share of the market at the expense of their competitors.

The focus should be on education raising the awareness of the risks and responsibilities and the cost to the community on both of these important issues.

The Government and industry have already worked together on campaigns, one only recently aiming the message at parents to highlight how their behaviour towards alcohol can influence those of their children.

Obesity and alcohol abuse are major problems socially, economically and importantly health, joint initiatives demonstrate how industry and government agencies can work together to advocate and achieve positive outcomes, to make obvious healthy lifestyle choices.

Banning advertising for particular food groups and alcoholic beverages is not the answer.

Given its history of participation on various Advertising Committees and Code Councils, the Bureau is always very keen to contribute in any forum which promotes a balanced approach to social and corporate responsibility in the role of advertising.

As the peak industry association the [Australian Publishers' Bureau](#) would welcome the opportunity to work with the Taskforce and Government Agencies on any initiative developed from the outcomes of these discussion papers.

Australia leads the world in so many fields of endeavours, let Australia lead the world in a collective and cohesive response to these important issues.

Yours faithfully,



Lianne Richards
[Executive Director](#)

Endnotes

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