Submission in response to the Consultation Paper on the Community Sponsorship Fund

Cancer Council Australia is the nation’s peak non-government cancer control organisation. Cancer Council Australia advises the Australian Government and other bodies on practices and policies to help prevent, detect and treat cancer and also advocates for the rights of cancer patients for best treatment and supportive care.

Cancer Council Australia congratulates the Commonwealth government on its initiative to establish the Community Sponsorship fund to provide an alternative to alcohol sponsorship for sporting and cultural organisations and welcomes the opportunity to provide comment in relation to the Fund’s operation.

Overview

Alcohol is a known risk factor for cancer, with the risk increasing with increasing consumption. In 2005, 2997 new cancer cases and 1376 cancer deaths were attributed to excessive alcohol consumption.(1)

In order to reduce the number of alcohol related cancers, Cancer Council supports a comprehensive approach to reducing excessive alcohol consumption, including increased restrictions on where, when and how alcohol can be marketed. In particular Cancer Council supports measures that restrict alcohol advertising and sponsorship that appeals to or is connected with content or events that appeal to people under 25 years of age because of the disproportionate level of alcohol-related harms borne by young people.

Cancer Council supports the establishment of the Community Sponsorship Fund (CSF) as a means of reducing the dependence of sporting and cultural organisations on alcohol sponsorship, with the potential to reduce the exposure of young people to alcohol marketing and promotion.

However Cancer Council considers that to maximise the effectiveness of the CSF it must be supported by broader restrictions on alcohol advertising and promotion.

Background

Alcohol and cancer

Alcohol is a known risk factor for cancer, and risk increases with increasing consumption. There is no evidence of any safe level of alcohol consumption for cancer risk or any protective effect for any form of cancer.(2)

There is convincing evidence that alcohol consumption is a cause of cancers of the mouth, pharynx, larynx, oesophagus, colorectum (men) and breast and probably causes liver cancer and colorectal cancer in women.(3) Scientific research is continuing to identify other cancers which could be linked with alcohol use. For example there is some evidence that heavy alcohol consumption may be associated with a higher risk of prostate cancer (4;5) and pancreatic cancer.(6)

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Proportion of Australians at risk

In 2007 one in 10 drinkers aged 14 years or over consumed alcohol at levels considered to be harmful in the long term and one in five consumed alcohol once a month or more at levels considered to be harmful in the short term. (7) Dinking at risky or high risk levels for both short and long term harm is highest among young adults aged 20-29 years. (7)

About 44% of all alcohol reported to have been drunk in 2001 was consumed by people who were at risk or high risk of the long-term effects of drinking. (8)

These data are based on the drinking guidelines provided in the 2001 NHMRC alcohol guidelines which have since been revised downwards, so the proportion of drinkers drinking at risky levels as defined by the current guidelines is likely to be significantly higher.

Alcohol and young people

Young people bear a disproportionate level of harm from alcohol-related accidents and injury. (9;10) Young Australians aged 18-24 years report the highest prevalence of high risk alcohol consumption of all age groups and over half of all serious alcohol related road injuries occur among 15-24 year olds. (10)

Alcohol consumption at an early age can also adversely affect brain development (11) and early initiation to alcohol is associated with a higher risk of problem drinking in adulthood and with long term adverse health impacts including increased risks for a range of diseases. (11;12)

Much of the current research around the effects of alcohol marketing illustrates the impact on children and young people. This is because in general, marketing is particularly important for recruiting new consumers, and alcohol-related harm is more acute in young people than in older people. (9;10)

Impact of alcohol promotion on consumption and harm

Recent reviews of the evidence conclude that there is a small but consistent association between alcohol advertising and overall levels of alcohol consumption and related harms. (13-16)

Studies consistently show that exposure to alcohol advertising and promotion is linked to a significantly increased likelihood that young people will start to drink alcohol and that those that already drink will drink more heavily. (10;13;15-19)

Exposure to alcohol advertising has been shown to shape young people’s beliefs, attitudes and drinking behaviours and to significantly influence young people’s decisions about drinking and their expectations related to alcohol use. (10) Several studies have shown that young people, even 10-12 year olds, are adept at interpreting the messages, images and targeting of alcohol advertisements in the same way as adults. (20;21) In effect, the more aware, familiar and appreciative young people are of alcohol, the more likely they are to drink both now and in the future.

Although the alcohol industry argues that it does not deliberately set out to target the youth market, the appeal of alcohol advertising to the youth market is strong. Advertising messages for alcohol tap into young people’s goals of good times, sex and social acceptance; promotions increasingly use avenues such as the internet which are more
accessible and appealing to younger drinkers; and sporting and cultural events which appeal
to younger audiences are a major target of alcohol sponsorship.(10;13)

**Alcohol promotion in Australia**

Alcohol beverages are marketed and promoted through a mix of television, radio and print
advertisements, point-of-sale marketing and sponsorship of sporting and cultural events.

Expenditure on measured 'above the line' alcohol advertising in Australia, which includes
television, radio and print media as well as cinema and outdoor advertising, totalled over
$109m in 2008.(22) In addition, an estimated two to four times that amount is spent on
‘below-the-line’ marketing techniques, particularly in association with sporting and cultural
events, teams and players, branded materials and point of sale promotions.(23;24)

**Events and team sponsorship**

Sponsorship of sporting and cultural events, organisations and participants is commonplace
in Australia. Event and team sponsorship offers alcohol marketers a receptive audience
motivated to have a good time, (10) commercial opportunities such as exclusive stocking
agreements, and the chance to embed their brands in the everyday activities of current and
potential consumers.(25)

It has been estimated that in Australia each year, $50 million of sponsorship for major
sporting events comes from alcohol companies, with 80% invested by three companies—
Fosters, Lion Nathan and Diageo.(26)

Attitudes towards alcohol consumption are strongly influenced by social and cultural norms
and by the specific social situation in which alcohol consumption occurs. In Australia, sport
and alcohol have a particularly close association.(27) Indeed, it is difficult to have any
involvement in sport in Australia, as either a participant or fan, without being exposed to a
strong message that alcohol and sport are inextricably connected.(28) Excessive drinking is
normalised by some elite athletes, who are role models to young people.

Research indicates that alcohol industry sponsorship of sports people and, in particular, the
provision of free or discounted alcoholic drinks in association with sporting events is
associated with hazardous levels of drinking.(29) There is also clear evidence of an
association between adolescent drinking and ownership of alcohol promotional items,(30)
which are an important feature of alcohol sports sponsorship.

Alcohol companies also sponsor music events, festivals and other cultural events. As yet,
the evidence is limited as to the effects of alcohol sponsorship of cultural events upon young
people.

**Extent of alcohol sponsorship in children’s sport**

In 2009, Sydney University and Cancer Council NSW conducted a phone survey of 108
children’s sports clubs for each of the nine most popular sports for children aged 5 to 17
years in New South Wales and ACT which were randomly sampled from the Sydney,
Illawarra and Canberra/Queanbeyan Statistical Divisions/Districts. Selected sports included
soccer, swimming, netball, rugby league, tennis, outdoor cricket, martial arts, basketball and
athletics/track and field. Six percent of sponsors (ie 20 of the 347 total sponsors) identified
were alcohol related, including local pubs and clubs. These alcohol-related sponsors were
frequently the main sponsors of sports clubs (65% of all alcohol sponsors). As well, clubs
that operate other functions but also sell alcohol, such as Workers clubs, RSL clubs and Bowling clubs, were also sponsors. No alcohol manufacturers were found to sponsor sports clubs. Sports clubs that had predominately younger members (aged 5 to 14 years) had a similar proportion of alcohol sponsors to those with mostly older players or a mix of ages (5% vs. 6% and 7%). (31)

**Cancer Council’s position**

Comprehensive measures must be taken to restrict alcohol promotion in Australia in order to reduce alcohol consumption and related harms including increased cancer risk.

Cancer Council supports the introduction of legislation which restricts alcohol marketing that either appeals to, or is connected with content that appeals, to people under 25 years of age.

Cancer Council also recommends introducing legislation to restrict the sponsorship of sporting and cultural events, organisations or participants (such as sports teams or athletes), by alcohol companies, where:

a) 10% or more of the attendees at the event are under the age of 25; or

b) a reasonable person would consider that an event appeals to people aged under 25.

Legislation that restricts sponsorship of events, organisations or participants by alcohol companies should take an incremental approach, permitting existing sponsorship agreements to run their course and allowing sufficient time for event organisers and sporting teams to seek alternative sources of sponsorship.

Cancer Council supports the establishment of the CSF as a means of reducing the dependence of sporting and cultural organisations on alcohol sponsorship, with the potential to reduce the exposure of young people to alcohol marketing and promotion. In particular Cancer Council supports the CSF objectives outlined in the consultation paper of reducing the exposure of young people and children to alcohol imagery and branding and removing the links between alcohol and sporting and cultural activities that young people are often directly involved in.

However, Cancer Council notes that the $25m allocated to the CSF over 4 years ($6.25m pa) is dwarfed by current levels of alcohol industry expenditure on advertising and marketing, including sports sponsorship, which total in the hundreds of millions of dollars each year. Without accompanying restrictions on alcohol marketing and promotion, including sponsorship, the effectiveness of the CSF in achieving its objectives is likely to be severely compromised.

Cancer Council acknowledges that, if restrictions on alcohol industry sponsorship were introduced, demand for funding from the CSF could be substantial. In this case it may be appropriate to increase funding to the CSF by allocating a dedicated proportion of alcohol taxation revenue to the Fund.

**Response to questions raised in the Consultation Paper**

In responding to the questions raised in the Consultation Paper, Cancer Council’s comments will focus on the issue of the conditions that funded organisations would need to accept to receive funds from the CSF.
Q A. For the purposes of eligibility criteria for the Community Sponsorship Fund, should the definition of “alcohol industry” include community-based licensee sponsorships and “in-kind” sponsorship arrangements?

Cancer Council adopts the definition of alcohol marketing as outlined in the WHO Global Alcohol Strategy and accordingly considers alcohol marketing and promotion to be “any form of commercial communication or message that is designed to increase, or has the effect of increasing, the recognition, appeal and/or consumption of particular products and services. It could comprise anything that acts to advertise or otherwise promote a product or service. (32)

Cancer Council considers that community based licensee sponsorships and “in-kind” sponsorship arrangements which involve special offers relating to alcohol such as price discounts, are forms of alcohol marketing and promotion that should be subject to restriction. Consequently we support the inclusion of these arrangements in the definition of “alcohol industry” for the purposes of eligibility criteria for the CSF.

Q B. Should Community Sponsorship Fund disbursements be restricted to organisations that are current or previous recipients of “alcohol industry” funding?

Cancer Council does not support this restriction in the absence of general restrictions on alcohol industry sponsorship or major increases in funds available through the CSF as it is likely that alcohol industry sponsorship funding will simply be diverted to new organisations.

Cancer Council considers that organisations should not be eligible to receive alcohol industry sponsorship concurrently with funding from the CSF because this would undermine the objectives of the Fund.

Q C. Should organisations that receive “alcohol industry” sponsorship be required to remove all alcohol branding imagery eg from uniforms, venues?

Cancer Council is opposed to all forms of marketing and promotion of alcohol because of evidence of harms to young people and this includes alcohol branding imagery at the point of sale.

As stated previously, Cancer Council considers that organisations should not be eligible to receive alcohol industry sponsorship concurrently with funding from the CSF. Any alcohol branding imagery from previous alcohol industry sponsorship arrangements should be removed as a condition of CSF funding. Where organisations receiving CSF funding hold a liquor licence they should also be required to remove all alcohol advertising and branding imagery from uniforms and their venue.

D) For organisations that either hold or will obtain a liquor licence concurrently with funding from the Community Sponsorship Fund, what undertakings or requirements should the Department seek to ensure alcohol is served in a responsible manner?

Organisations with a liquor licence that receive funding from the CSF should have a responsible service of alcohol policy and should be able to demonstrate that staff are trained in responsible service of alcohol.

In addition organisations should undertake to restrict advertising and promotion of alcohol products at events which are likely to appeal to or have 10% or more of attendees at the event under the age of 25.
Q E ) Other issues

Cancer Council is strongly of the view that the CSF should be introduced in conjunction with other regulations that will result in a reduction of young people’s exposure to the marketing of alcoholic beverages. As noted above Cancer Council supports restrictions on alcohol marketing and promotion, including sponsorship, that either appeals, or is connected with content that appeals, to people under 25 years of age. Without restrictions on alcohol marketing and promotion, including sponsorship, the effectiveness of the CSF in achieving its objectives is likely to be severely compromised.

Acknowledgement

This submission is based on Cancer Council's position statement on the marketing and promotion of alcohol. As such, the authors wish to acknowledge the assistance of the Alcohol Policy Coalition in drafting that position statement.

Reference List


(28) Jones S. Alcohol and sport: can we have one without the other? (paper presented at the Proceedings of the Australian and New Zealand marketing Academy Conference. 2006 Dec 4; 2007.


