

Responsible Commercial Advertising

Policy Position Statement

- Key messages:** Commercial advertising has some benefits to society, but also contributes to unnecessary over-consumption and may undermine health. The community should be empowered to respond to unethical, inaccurate or unsubstantiated claims by lodging complaints to relevant authorities about unhealthy product or service advertisements. A strong legal regime for the regulation of commercial advertising will contribute to public health.
- Key policy positions:**
1. Legislation should be passed to ensure that commercial advertising must be ethical, factual, and not make unsubstantiated claims.
 2. The placement of advertising should be controlled to protect vulnerable groups.
- Audience:** Federal, State and Territory Governments, policy makers, program managers and relevant authorities.
- Responsibility:** PHAA Alcohol Tobacco and Other Drugs Special Interest Group
- Date adopted:** 26 September 2018 (*NB: this version includes new paragraph 14 inserted as part of the [Unhealthy Political Influence](#) policy position statement adopted in September 2021*)

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PHAA affirms the following principles:

1. Commercial advertising, which encompasses a broad range of media including TV, radio, print, outdoor, digital, product placement and sponsorship, has a legitimate role in informing people about product and service availability and price.
2. Commercial advertising can be used as a component of social marketing campaigns to bring about positive change in society.

PHAA notes the following evidence:

3. Commercial advertising of alcohol is used to promote products or services which are inherently unhealthy, such as alcohol and gambling, or which potentially undermine public health, such as foods with high energy density but low nutritional value.

Commercial advertising of alcohol:

4. Plays a role in manufacturing desire for products and services which goes beyond information and is one factor stimulating and normalising over-consumption;^{1, 2}
5. Normalises alcohol consumption and obscures health risks through deliberate associations with healthy activities such as sport, and diseases, conditions or causes for which alcohol is a risk factor;
6. Often plays on status anxiety³ at a psychological level which highlights and normalises socioeconomic inequality - the fundamental social determinant of ill health;⁴
7. May make unsubstantiated claims about products and services;
8. Directs marketing to vulnerable groups such as children who are not psychologically capable of critically examining or understanding the processes of advertising;⁵
9. Can have socially and environmentally deleterious effects in driving resource depletion, environmental damage and waste production;
10. Can contribute to worsening psychological wellbeing and physical health;
11. Should be the subject of independent regulation, as industry self-regulation is open to conflicts of interest whereby commercial imperatives are prioritised over the wellbeing of the public.⁶

PHAA seeks the following actions:

12. Appropriate regulation of commercial advertising should ensure that advertising is ethical, factual and accurate; does not make unsubstantiated claims; is limited primarily to information about availability, location and price; and that the placement of advertising is controlled to protect vulnerable groups.
13. Where the regulation of commercial advertising is not consistent with these principles, steps should be taken to strengthen the regulatory approach.
14. Consistent with PHAA's [Unhealthy Political Influence policy position statement](#) (2021), donations from the commercial advertising sector to political parties should be prohibited. *[NB: this para inserted in September 2021]*

PHAA resolves to:

15. PHAA will:
 - Respond to unethical, inaccurate or unsubstantiated claims where appropriate by lodging complaints to relevant authorities about unhealthy product or service advertisements.
 - Advocate for appropriate regulation of commercial advertising
 - Lodge complaints to relevant authorities about unhealthy or health damaging product or service advertisements opportunistically.
 - Raise awareness of members and the public about the broader adverse effects of advertising that goes beyond the provision of information.

(First adopted 2012, revised in 2015, 2018 and 2021)

References

1. Hamilton C, Denniss R. *Affluenza: when too much is never enough*. Crows Nest, NSW: Allen & Unwin; 2005.
2. Spring J. *Schooling for Consumption*. In: Sandlin J, McLaren P, editors. *Critical Pedagogies of Consumption: living and learning in the shadow of the "Shopocalypse"*. New York & London: Routledge; 2010.
3. de Botton A. *Status anxiety*. Sydney: Penguin; 2005.
4. Wilkinson R, Pickett K. *The spirit level: Why more equal societies almost always do better*. London: Allen Lane; 2009.
5. Carter OB, Patterson LJ, Donovan RJ, Ewing MT, Roberts CM. Children's understanding of the selling versus persuasive intent of junk food advertising: implications for regulation. *Soc Sci Med*. 2011;72(6):962-8.
6. Moodie R, Stuckler D, Monteiro C, Sheron N, Neal B, Thamarangsi T, et al. Profits and pandemics: prevention of harmful effects of tobacco, alcohol, and ultra-processed food and drink industries. *The Lancet*. 2013;381(9867):670-9.