

Submission to the Review of Alcoholic Beverages that may target Young People



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About NCOSS

The Council of Social Service of NSW (NCOSS) is an independent non-government organisation and is the peak body for the non-government human services sector in NSW. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in New South Wales.

It was established in 1935 and is part of a national network of Councils of Social Service, which operate in each State and Territory and at Commonwealth level.

NCOSS membership is composed of community organisations and interested individuals. Affiliate members include local government councils, business organisations and Government agencies. Through current membership forums, NCOSS represents more than 7,000 community organisations and over 100,000 consumers and individuals.

Member organisations are diverse; including unfunded self-help groups, children's services, youth services emergency relief agencies, chronic illness and community care organisations, family support agencies, housing and homeless services, mental health, alcohol and other drug organisations, local indigenous community organisations, church groups, and a range of population-specific consumer advocacy agencies.

Alcoholic Beverages and Young People

Currently only anecdotal information is available in Australia in regards to the consumption of Ready to Drink (RTD) alcoholic beverages by young people. It is more likely that young people drink these products though it would appear that they are not consumed to the same extent as beer or spirits. International research shows that 13 – 14 years olds do consume RTD products, however anecdotal information from services that support young offenders, shows that young women aged 15 – 18 years old prefer sprits mixed with soft drinks rather than the sweet alcohol mixes of RTD products.

NCOSS has been informed by member organisations that many young girls ask their mothers to purchase these drinks, on their behalf, for parties. Mothers do this out of a genuine concern for the safety of their daughters, acknowledging that their daughters will try alcohol and in belief that it is safer for the daughter to take their own drinks rather than accepting drinks from others. This is especially so in the light of recent problems with 'spiked' drinks being given to young women. However mothers are also acknowledging an increase in young daughters aged 13 – 14 with social drinking problems that they feel powerless to prevent, due to the cultural norm of drinking.

Many parents allow their children to drink a glass of wine with dinner; in some cases this is a part of their cultural background as a way to teach children about safer levels of alcohol consumption in contrast to unsupervised binge drinking, which is often the norm in youth culture. Many parents have a perception that the hosting parents of the young person are supervising young people drinking alcohol at their parties. However this often does not happen.

It was agreed by the organisations that NCOSS consulted that the RTD products appear to be primarily aimed at young girls. NCOSS was informed that there is research, which shows that the misuse of recreational drugs and alcohol is higher in young girls and that young girls experience harm from alcohol at a younger age (16 – 19) than young boys i.e. the age of greatest harm of alcohol consumption for young males is 21 – 24 years old. Current research also shows that there is a greater risk of long-term problematic drinking and negative health problems throughout life, the earlier the age of initiating harmful alcohol consumption.

Recommendations:

1. That the NSW Government develops a consistent education campaign, which is run for parents and children informing them of RTD products and raising their awareness of product content and the safe consumption of alcohol.
2. To provide greater support to parents of teenage children regarding parenting skills, especially around drug and alcohol issues, through additional programs being funded by the Department of Community Services and being run by appropriate Non-Government services, such as youth, drug and alcohol services or family support.
3. That the NSW Government establishes a confidential support program for parents, children and independent young people experiencing problems with alcohol abuse, funded by the Department of Gaming and Racing and operated by Non Government Drug and Alcohol Services.
4. That the NSW Department of Education expands current programs on drug and alcohol education to specifically cover RTD products.

The Appeal of Ready to Drink Alcoholic Beverages

RTD products provide young people with greater mobility. The packages are smaller, similar to the four packs that soft drinks come in, and fit easily in bags or backpacks, which makes transportation easier. They are pre-mixed so additional mixer products do not need to be taken as with traditional spirits. If they are confiscated it is perceived that there is less to lose in terms of alcohol and costs. (i.e. to lose a bottle of whiskey has greater financial cost)

RTD products can easily be drunk publicly and not be noticed. The packaging and design is similar to soft drinks and this gives the young person the 'buzz' of being able to do something illegally with little fear of being caught.

NCOSS was informed that for many young people there is a perception that they are drinking a 'mature' soft drink. These are drinks that their parents' do not drink and therefore have become trendy for the next 'generation' - they are 'different' to their parents. This is due, in part, to the developmental stages of adolescence where young people begin to act independently from their parents.

Recommendations

5. To conduct surveys after events, such as Bachelor and Spinster balls, and after events where alcohol is banned, by collecting the bottles left behind, to determine what is actually being drunk at these events.
6. That research is conducted by Universities or other research bodies, across Local Government Areas or by Area Health Service, to determine who is buying RTD products, where they are buying them from, why they are buying them and who is drinking them, to enable appropriate harm minimisation responses by Government, Industry and the community.

The Issues and Impacts

The organisations that NCOSS consulted indicated that it is unlikely for a young person to sit down and drink a bottle of spirits (whiskey, gin, vodka etc) and if they do they are more aware of the amount of alcohol that they have consumed. However young people can drink the equivalent of these spirits in RTD products without thought as the taste of the alcohol is hidden. It was commented that these products appear to intentionally hide the taste of alcohol to make them more appealing.

The sweetness of RTD products, which hides the taste of the alcohol, leads the young person to feel as though they are not drinking an alcoholic drink. It is therefore easier for young people to become drunk in an uncontrolled environment, such as parties, or in public places such as the beach or park. This leaves the young person open to a greater risk of experiencing violence or of committing petty crimes themselves.

The alcoholic content of RTD products range from 2% - 7% (with some going as high as 17%), however alcoholic content is not prominently labeled on the bottles. Many young people start on one type of RTD product and then could unknowingly switch to another stronger drink, in the belief that the products are all the same. This can impact on drinking behaviour and can lead to an increase in intoxication and placing the young person at risk.

Another major concern raised with NCOSS is the mixing of recreational drugs and alcohol by young people. There has been an ongoing campaign to encourage young people to re-hydrate when taking recreational drugs, however water is considered bland and so young people are re-hydrating with RTD products. The young person considers this to be okay as the RTD product is believed to contain fruit and electrolytes, so the intention behind their consumption is actually positive. NCOSS was informed that at many venues mineral water costs the same as RTD products so there is no impetus for young people to drink water. There is also an increasing tendency for venues to only sell RTD products, as it is easier and cheaper to serve.

Recommendations

7. That it is legislated that all venues are required to charge a significantly higher cost for RTD products than mineral or bottled water.
8. All RTD products are clearly labeled as to their alcoholic content with a clearer indication of how many standard drinks are within the bottle (presently this is not prominently displayed).

Advertising and Marketing

It was commented to NCOSS that RTD products are obviously aimed at young people, with adverts using the latest fashions, music and bright colours to make these drinks attractive. They are often advertised during young people's programs such as music video programs. The RTD product then becomes associated with a 'lifestyle'. This places pressure on the young person to drink the RTD product in order to become an accepted part of the culture and 'lifestyle'. This is especially so for marginalised young people who want to be accepted by their peers.

While it is acknowledged that young people have always drunk alcohol, in the past they were not a specific target market, whereas they now are. The concern raised with NCOSS about this targeted marketing is that the advertising of RTD products implies that you can drink and party all night. It promotes drinking to excess rather than sensible and safe consumption of alcohol. A prime example of this is the advert of a high profile rum brand, which is in direct conflict with the advertising code, which aims to prevent misleading statements, ensures irresponsible and dangerous practices are not encouraged and ensure minors are not the target of alcohol advertising.

NCOSS is also concerned that the marketing and packaging of RTD products is styled in a similar manner to sports or soft drinks. The bright colours of the drinks are similar to soft drinks and cordials. There is almost an implied progression from cordial to soft drink to RTD product. For example a new type of mini drink is packaged in a similar manner to many yoghurt drinks. NCOSS was also informed that one company, which produces a healthy mineral water with ginseng, has produced an alcoholic beverage in very similar packaging.

Again as raised earlier in this submission the alcohol content of these drinks is not obvious enough either on the packaging or in the advertising.

While this inquiry is not looking specifically at current advertising practices, there was reference made in the discussion paper to the implementation of the recommendations from the review of the self-regulatory system by the Ministerial Council on Drug Strategy. While NCOSS is supportive of the directions of the document and many of the recommendations, it is apparent that the document does not go far enough.

It seems particularly worrying that it is currently harder to approve drugs that can save people's lives than it is to advertise products that can cause harm.

Of specific concern to NCOS and the organisations consulted are the following:

1. The ABAC Management Committee encourages all alcohol beverage industry members to participate in a pre-vetting system.
2. The ABAC Management Committee is encouraged to ensure that all smaller industry members become signatories to the ABAC.
3. That the ABAC Management Committee is made up entirely of representatives from the alcohol beverage industry, though a recommendation has been made to include a Government representative.
4. The comment in the document on page 36 that 'if the recommendations in this report are adopted' implies that there is no enforcement behind any of the recommendations within the report, therefore making improvements harder to implement.

This concern is highlighted when the code aims to prevent misleading statements, ensure irresponsible and dangerous practices are not encouraged and ensure young people are not the target, however adverts are released that are aimed at young people and do all these things. So one would have to question the effectiveness of the current code.

Recommendations

9. A standard obvious symbol is created and placed in a prominent position on RTD products and in advertising campaigns, which indicates that the product is alcoholic and the alcohol content.
10. All labeling of RTD products to clearly and prominently indicate the number of standard drinks per product.
11. An independent watchdog (neither Government nor industry) is established to monitor and pre-vet alcoholic beverage advertising for all age groups, this can be established with seed funding from the Government and maintained by voluntary contributions from the liquor industry as a part of their commitment to social responsibility.
12. To conduct marketing research on what it is about RTD products appeals to young people.
13. All alcohol beverage industry members are required to be signatories to the ABAC and that all adverts must be pre-vetted before they are publicly released.
14. To ensure that the ABAC management committee also consists of representatives from the community and key organisations, both Government and Non-Government that represent the health needs of young people.
15. The above recommendations are legislated for under the Act and enforced in order to ensure improvements within the industry.

Legislation

Overall NCOSS is supportive of the current legislation, however there are three recommendations that would improve the overall effectiveness of the legislation.

Recommendations

16. That the penalty units' fine is increased. The current penalty of 50 penalty units (a penalty unit is \$110) is not considered a significant enough deterrent when compared to the amount of money that the industry makes in selling these products.
17. The penalty units, at a higher rate, also apply to the company that produced the RTD product, not just to the licensee that sells the product.
18. In the Liquor Act 1982, section 117I, part 4 and the Registered Clubs Act 1976, No.31, 57C, part 4, that consultation be expanded to include other relevant community bodies not just representatives of the liquor industry.

Conclusion

Ready to Drink alcoholic beverages have been available for a number of years, however the variety and number that are available have increased significantly as has the advertising to promote them. The methods of advertising make it obvious that these drinks are targeted at young people and as a result young people, especially those below the legal drinking age, are taking these up as the drink of choice.

NCOSS supports a proactive, preventative harm minimisation response to the issues that these drinks raise as opposed to a reactionary prescriptive response. It is about educating young people and their parents and about making the liquor industry responsible for its products.

In consultation NCOSS was informed that the "Drink, Drunk – The Difference is Yours" campaign was highly effective with young people. Its communication strategy was particularly effective because young people could associate with the people, and the impacts of excess drinking, in the advert with either themselves or peers. NCOSS supports the re-introduction of a new campaign based on these adverts as a part of the overall education strategy regarding RTD products.

NCOSS also calls for resources to be made available in order to effectively implement the recommendations of the NSW Alcohol Summit Communiqué Document.

Recommendation

19. That a responsible state based responsible drinking campaign, which is linked to locally driven regional and area based campaigns, is established. The campaign must:
- (a) Be scenario based, scare tactics do not work with young people and neither does fear, shame or blame.
 - (b) Include specific target groups while not encouraging stereotypes. For example gay youth are twice as likely to drink alcohol and lesbian youth are three times as likely to drink alcohol as the general youth population.
 - (c) Be culturally sensitive to youth from Aboriginal and Torres Strait Islander and Culturally and Linguistically Diverse Backgrounds.
 - (d) Include extensive consultation and collaboration with youth and relevant peak and health bodies.
 - (e) Go across all forms of media – print, TV, cinema, video, Internet etc)
 - (f) Target parents and schools
 - (g) Be set in a variety of environments with mixed crowds, rather than one specific cultural group.

Organisations Consulted

Aboriginal Health and Medical Research Council
Aids Council of NSW
Alliance of NSW Divisions
Leichhardt Women's' Health Centre
Mental Health Coordinating Council
NSW Association for Adolescent Health
Youth Accommodation Association