

17 August 2015

Broadcasting Standards Authority

Email: info@bsa.govt.nz

To whom it may concern

Codes of Broadcasting Review

Thank you for the opportunity to provide feedback on this review.

Hawke's Bay District Health Board (HBDHB) focuses on the health of the whole population of Hawke's Bay. In supporting health and wellbeing we aim to work with other bodies who impact on health; in this work we have noted the potential Codes of Broadcasting have on reducing harm to our community.

The messages and information received via television and radio are hugely influential. As a district health board we are aware that Codes of Broadcasting are important for ensuring that New Zealanders receive messages that are in their best interests. This is even more important for vulnerable members of our society, especially children. We support the Authority's view that Broadcasting Standards must reflect the general values and expectations of New Zealand society.

This Code Review provides an opportunity to reduce harm and increase wellbeing in our community. Managing the content on television and radio to reduce harm is an effective tool and we have seen this with rules around advertising of both tobacco and alcohol. This has served to de-normalise the use of tobacco in particular. There is still a lot to be done, however, in how messages are broadcast around alcohol, junk food, and sugar sweetened beverages, all of which have a large role to play in negatively impacting on the health and wellbeing of New Zealanders.

In terms of alcohol, the New Zealand Law Commission's 2010 report¹ concluded that there was sufficient evidence of an association between alcohol advertising and sponsorship, early initiation to drinking, and increased consumption patterns to warrant significant additional restrictions. This is supported by more recent research which illustrates that positive emotional reactions to advertising messages (about a favourite brand, for example) is a predictor for increased consumption² and that frequent exposure to alcohol advertising increases the likelihood of early initiation of drinking alcohol.³

¹ New Zealand. 2010. *Alcohol In Our Lives: Curbing The Harm. A report on the review of the regulatory framework for the sale and supply of liquor*. Law Commission Report no. 114.

² Lin, E., Caswell, S., You, R. & Huckle, T. (2012). Engagement with alcohol marketing and early brand allegiance in relation to early years of drinking. *Addiction Research & Theory*, 20(4), 329–38.

³ De Bruijn, A., Tanghe, J., Beccaria, F., Bujalski, M., Celata, C., Gosslet, J., Schreckedberg, D. & Slowdonik, L. (2012). *Report on the Impact of European Alcohol Marketing Exposure on Youth Alcohol Expectancies and Youth Drinking*. Alcohol Measures for Public Health Research

CHIEF EXECUTIVE'S OFFICE

Hawke's Bay District Health Board

Telephone 06 878 8109 Fax 06 878 1648 Email: ceo@hawkesbaydhb.govt.nz, www.hawkesbaydhb.govt.nz
Corporate Office, Cnr Omaha Road & McLeod Street, Private Bag 9014, Hastings, New Zealand

Research has found strong associations between increases in advertising for non-nutritious foods and beverages, and rates of childhood obesity. Most children under age six cannot distinguish between programming and advertising and children under age eight do not understand the persuasive intent of advertising. Advertising directed at children this young is by its very nature exploitative. Children have a remarkable ability to recall content from the advertisements to which they have been exposed. Product preference has been shown to occur with as little as a single commercial exposure and to strengthen with repeated exposures. Product preferences affect children's product purchase requests and these requests influence parents' purchasing decisions.⁴

This clear evidence demonstrates the harm that advertising has on the health outcomes and wellbeing for children and it is important that the tool we have as a society, the Code of Broadcasting Standards, supports the reduction of this harm.

We support change to the general code guideline but we make the following specific recommendations. In particular, we wish to provide feedback on the Children's Interests sections of the Free to Air and Pay TV Codes.

We recommend that "dangerous behaviour" is a separate bullet point from "anti-social or illegal behaviour" and that this point be revised to include smoking, the consumption of junk food and sugar sweetened beverages, and alcohol, as follows:

- Dangerous behaviour, including smoking and the consumption of junk food, sugar sweetened beverages or alcohol
- Antisocial or illegal behaviour

We recommend that in Section 3d of the Free to Air TV Code the term "audience expectations" is replaced with "parental/caregiver expectations" and "and" is replaced with "or", to read as follows:

- "...contain material which is outside parental/caregiver expectations or likely to disturb or harm children..."

We look forward to your consideration of our submission.

Yours sincerely



Dr Kevin Snee
CHIEF EXECUTIVE OFFICER

Alliance (AMPHORA). And Grenard, J. L., Dent, C. W. & Stacy, A. W. (2013). Exposure to alcohol advertisements and teenage alcohol-related problems. *Paediatrics*, 131(2), 369–79.

⁴ American Psychological Association (2004). *Report of the APA task force on advertising and children*. Washington, DC: Author. Retrieved from <http://www.apa.org/pi/families/resources/advertising-children.pdf>.