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Committee Secretary
Senate Standing Committees on Community Affairs
Parliament House
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Inquiry into Effective approaches to prevention, diagnosis and support for Fetal Alcohol Spectrum Disorder

The Alcohol Programs Team at the Public Health Advocacy Institute of WA (PHAIWA) and Cancer Council WA welcome the opportunity to contribute to the Inquiry into Effective approaches to prevention, diagnosis and support for Fetal Alcohol Spectrum Disorder (FASD).

Our organisations share a special concern about FASD. This submission will focus on the need to prevent alcohol-exposed pregnancies and will relate specifically to the (f) term of reference. There are many factors that influence women to drink during pregnancy and many of these overlap with factors that influence drinking patterns of the wider population. Therefore, we support a comprehensive approach for the prevention of FASD, with action on alcohol availability, price and advertising. We also believe that a comprehensive approach includes the development of well-designed, mandatory pregnancy warning labels for alcohol products, sustained investment for public education campaigns to raise awareness of the risks of drinking during pregnancy, upskilling of the health, education and justice sectors to identify those at risk, and support to coordinate regional FASD-related services.

To further inform this inquiry about an important aspect of the prevention of FASD and other alcohol harms, our organisations have collaborated to produce the report, *The 'Instagrammability of pink drinks': How alcohol is marketed to women in Australia*. We have pleasure in sharing this with the Committee. How alcohol is promoted to women is an important factor to consider given the significant body of evidence indicating that alcohol promotion influences attitudes, decisions and behaviours related to alcohol. Our report shows that the alcohol industry in Australia is designing and promoting products specifically for women. These products are often pink and palatable, and their promotions use imagery that is highly likely to appeal to young women and include health-related claims such as low sugar, low calorie and natural ingredients. With many pregnancies being unplanned and therefore an amount of time before the woman may be aware she is pregnant, there is a strong rationale to address alcohol marketing targeted at women.

Yours sincerely,

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“THE ‘INSTAGRAMMABILITY’ OF PINK DRINKS”

How alcohol is marketed
to women in Australia

November 2019

About the Alcohol Programs Team, Public Health Advocacy Institute of WA, Curtin University

The Alcohol Programs Team at the Public Health Advocacy Institute of WA, based at Curtin University, is dedicated to reducing harms from alcohol. The team works to raise awareness of the magnitude of alcohol-related harms, the evidence-based approaches we know can work, and the need to act without delay.

About Cancer Council WA

Cancer Council Western Australia (WA) is a non-government, not-for-profit cancer organisation that has no religious or political affiliations. Cancer Council WA has been involved in the governance and distribution of peer-reviewed cancer research funding, patient support, cancer prevention, and advocacy in WA for 60 years.

About Alcohol Advertising Review Board

The Alcohol Advertising Review Board (AARB) considers and reviews complaints from the Australian community about alcohol advertising. The AARB is run by the Alcohol Programs Team at the Public Health Advocacy Institute of WA and Cancer Council WA, supported by health organisations around Australia. It was developed in response to the numerous weaknesses in the current self-regulatory alcohol advertising system. The AARB aims to draw attention to the need for strong, independent, legislated controls on all forms of alcohol advertising and promotion to help protect children and young people in Australia.

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Introduction

ALCOHOL AND WOMEN IN AUSTRALIA

Across the globe, men have historically drunk more alcohol and experienced higher levels of alcohol-related harm than women.¹ This gender difference exists in Australia, with males more likely than females to drink at levels that place them at risk of harm, as well as consume alcohol in quantities that exceed the National Health and Medical Research Council's Australian Alcohol Guidelines.² Market research by Roy Morgan found the bulk of alcohol drunk in Australia is by men (67%), which is almost double the overall volume of alcohol drunk by women (33%).³

The gender difference in alcohol consumption makes women an important strategic target market for the alcohol industry.⁴ The development of products designed and promoted specifically for the female market, as well as reorienting the marketing of traditionally male products, allows alcohol companies to attract new consumers and increase their profits. The industry's efforts in targeting women have been effective, with the gap between men and women's alcohol use and levels of alcohol-related harm reducing both globally and in Australia.¹ While Australian females were 1.7 times as likely as males to have never consumed a full glass of alcohol in 2004, this had reduced to 1.2 times by 2016.²

The more alcohol is consumed by Australians, the more harm individuals, families, and our broader community experience. Thirty per cent of Australian women consume alcohol at levels that place them at risk of short term harm, and around one in 11 women consume more than two standard drinks per day on average, increasing the risk of alcohol-related harm over their lifetime.⁵ This is a concern due not only to the health risks that can affect anybody, but also because of the harms experienced specifically by women, including some cancers such as breast cancer. Alcohol is a risk factor for cancer of the mouth, pharynx, larynx, oesophagus, bowel, and breast, and has been classified as a Group 1 carcinogen.⁶ The link between alcohol and breast cancer is convincing and it is estimated that alcohol consumption causes one in five of all new breast cancer cases,⁷ yet women's awareness of the clear link is relatively low.⁸ Only 19% of Australian women know of the connection between alcohol and breast cancer,⁹ with similar low levels of awareness internationally.

Alcohol use during pregnancy is another serious concern, as it is a leading cause of preventable birth defects.¹⁰ Reducing alcohol use during pregnancy will reduce the prevalence and severity of Fetal Alcohol Spectrum Disorders (FASD), an entirely preventable but incurable condition caused by the baby's exposure to alcohol in the womb. FASD is a serious, pervasive neurodevelopmental disorder that is characterised by severe impairment in at least three of ten developmental domains.¹¹ These impairments can result in a wide range of problems including learning difficulties, reduced capacity to remember tasks from day to day, and anger management and behavioural issues, and often lead to school failure, mental health and drug and alcohol problems, and engagement with the law.¹² While the prevalence of FASD in Australia is not yet known, FASD has a significant burden on individuals, families, society, and governments.

Given around a quarter of all pregnancies in Australia are unplanned,¹³ in some instances alcohol will be consumed when women are unaware they are pregnant. Around one in four women in Australia drink alcohol knowing they are pregnant.² Confusion in the community still exists about whether drinking alcohol while pregnant is safe,¹⁴ likely to be exacerbated by the alcohol industry's misrepresentation of the evidence on the risks.^{15,16} There are many factors that influence women to drink during pregnancy and it is likely that many of these overlap with factors that influence drinking patterns of the wider population, including how alcohol is promoted and made available. Reducing alcohol consumption among women of child-bearing age is an important way the severe and lifelong impacts of FASD can be prevented.

WHAT DO AUSTRALIAN WOMEN DRINK?

There is also a difference between genders when it comes to drink of choice. The most popular alcohol product for women is wine, which accounts for almost half of the volume of alcohol drunk by women.³ Among teenagers who drink alcohol, pre-mixed spirits are the top choice for females aged 12–17 years.¹⁷ Industry publications note that females aged 18 to 39 years tend to favour the consumption of light ready-to-drink (RTD) products, wine, and ciders.¹⁸ While product categories such as beer and whiskey haven't traditionally been favoured by women, industry reports highlight efforts by the alcohol industry to develop products that appeal and are marketed to women.¹⁹

HOW DOES THE ALCOHOL INDUSTRY TARGET WOMEN?

The alcohol industry has been explicit in identifying women, including women of child-bearing age, as a target market.²⁰ Previous research has found marketing strategies specifically targeted at women include the development of new products such as fruit-flavoured beers and RTD products, as well as the use of stereotypical lifestyle messages that focus on fashion, slimness, motherhood, and female friendships.⁴ A perceived increase in 'health consciousness' among consumers, including women, has seen the development of products being marketed as low in calories, alcohol, sugar, and carbs.²¹ RTDs based on white spirits such as vodka, gin, and white rum are often marketed to female drinkers.¹⁸ For example, Vodka Cruiser is a leading brand in the 'light RTD' category,²² and its website heavily features images of young women.²³ There is also evidence of alcohol companies linking their products with women's rights, cultural events, and empowerment.²⁴ Diageo, the world's largest spirits company, was an official supporter of the 2019 International Women's Day²⁵ and in 2018 it released 'Jane Walker', a limited edition Johnnie Walker whiskey to celebrate "the many achievements of women and those on the shared journey toward gender equality and equal representation".²⁶

This report presents commentary from the alcohol industry and examples of alcohol ads to highlight how alcohol is marketed to women in Australia in 2019.

Methods

Industry trade publication *National Liquor News* and its online news site The Shout were searched for references to 'female', 'woman', 'women', 'lady', 'ladies', 'pregnant', 'pink', and 'rosé'. Quotes including these key words published between October 2018 and September 2019 were recorded.

All quotes were reviewed and three main themes were identified:

- **"The pink trend is in full swing"**: the development and promotion of pink alcohol products;
- **"As much an accessory as a drink"**: marketing that links alcohol products to fashion, make-up, or other stereotypical female interests and/or activities, or promotes products as a lifestyle choice; and
- **"Better for you alcohol choice"**: marketing that promotes alcohol products as being lower in calories or 'better for you'.

A list of alcohol brands owned by the companies attributed to the quotes was created. The official Facebook and Instagram pages for these brands were then searched for examples of ads that appeared to be aimed at women. These social media platforms were used to identify examples due to their accessibility.

In addition, the Alcohol Advertising Review Board complaints database was searched for references to 'female', 'woman', 'women', 'lady', 'ladies', 'pregnant', 'pink', and 'rosé' to identify other brands or products marketed to women. The official Facebook and Instagram sites for the identified brands were searched for examples of ads that appeared to be aimed at women.

“The pink trend is in full swing”

“Pink gin ... is the Instagram-friendly version of a flavoured gin that channels the vibe of rosé into spirit. It's more about colour than flavour, but that distinct pink hue has already proven hugely successful... Research from analyst CGA suggests that pink gin is bringing new drinkers to gin too, many of whom haven't previously drunk gin (54 per cent) and skewing female and younger than traditional gin drinkers (of legal age).”

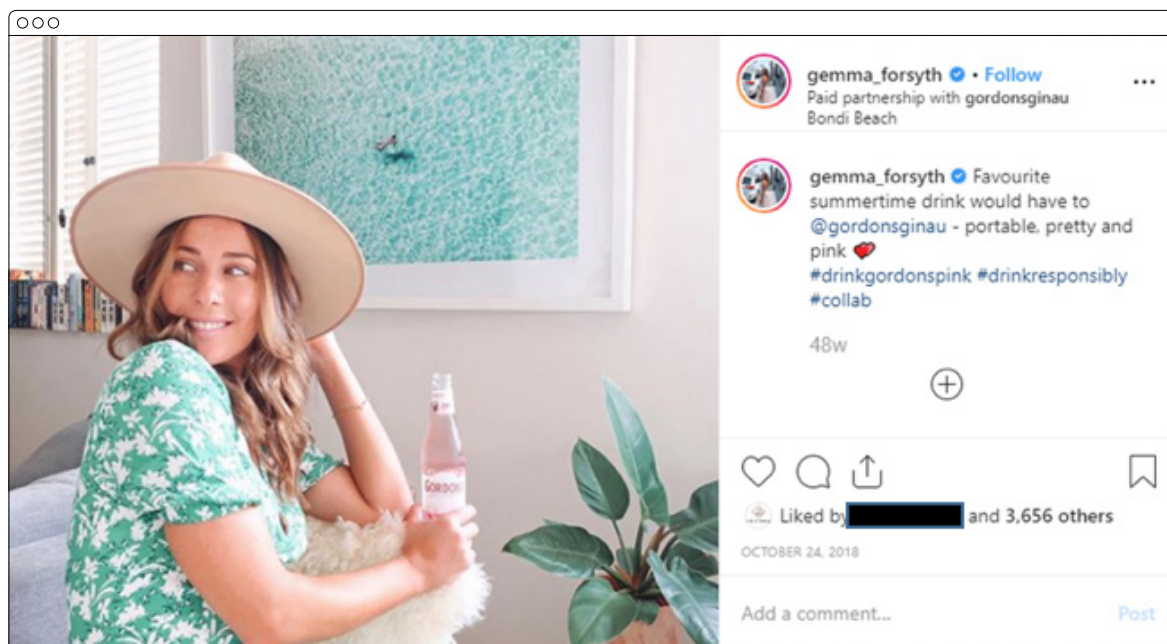
National Liquor News September 2019

“Gordon's Premium Pink Gin & Soda is such an inherently sharable serve, both in design and the attractive pale pink of the liquid itself that we're expecting it to be a popular choice amongst style-conscious millennials.”

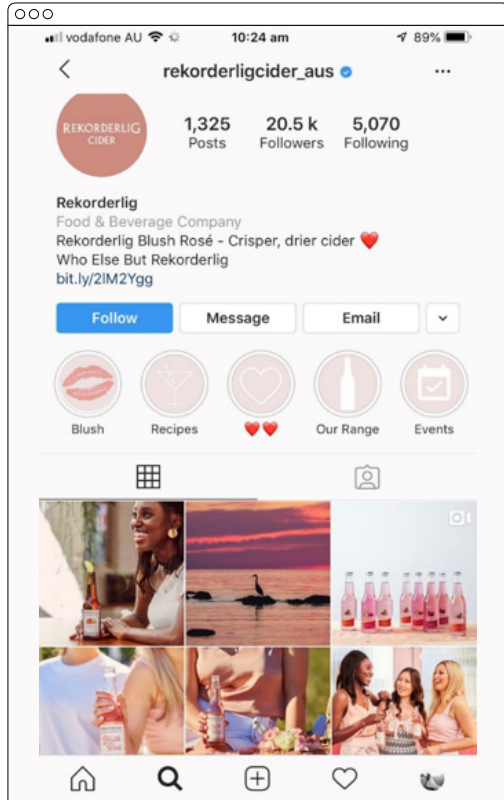
Diageo, National Liquor News October 2018

““Everything pink is flying in all categories,” he said. From pink gins in the UK, pink ciders in the USA or pink Sangria in Spain, the pink trend is in full swing led by female millennials. “The ‘Instagrammability’ of pink drinks has helped drive this cross-category growth and even the blokes are getting involved.””

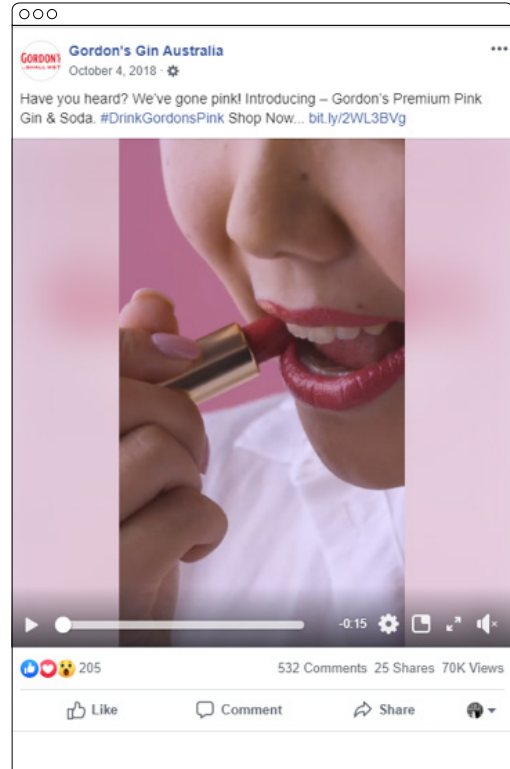
Treasury Wine Estates, National Liquor News September 2019



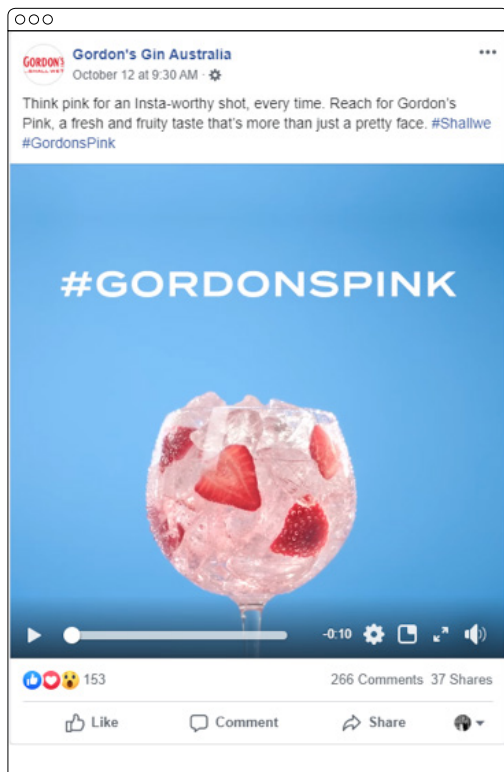
Source: @gemma_forsyth Instagram account.
Posted 2018 Oct 24, cited 2019 Oct 2.



Source: Rekorderlig Instagram account.
Cited 2019 Oct 15.



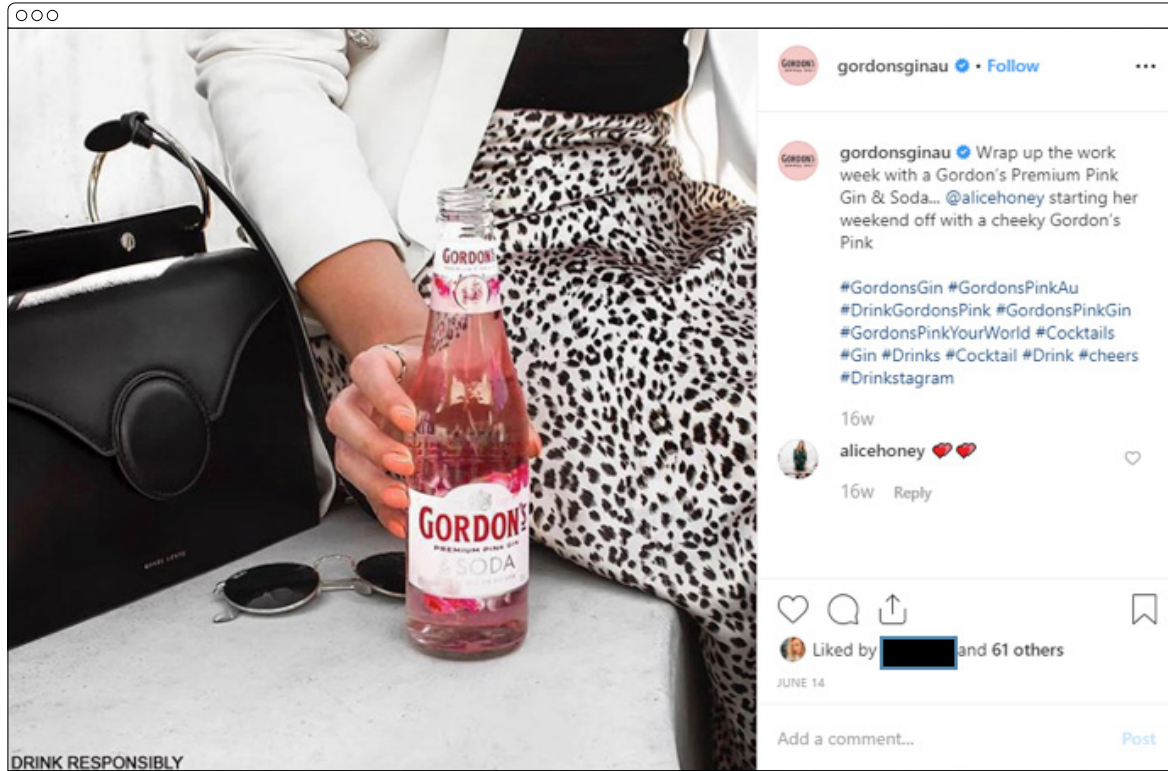
Source: Gordon's Gin Australia Facebook page.
Posted 2018 Oct 4, cited 2019 Oct 24.



Source: Gordon's Gin Australia Facebook page.
Posted 2019 Oct 12, cited 2019 Oct 24.



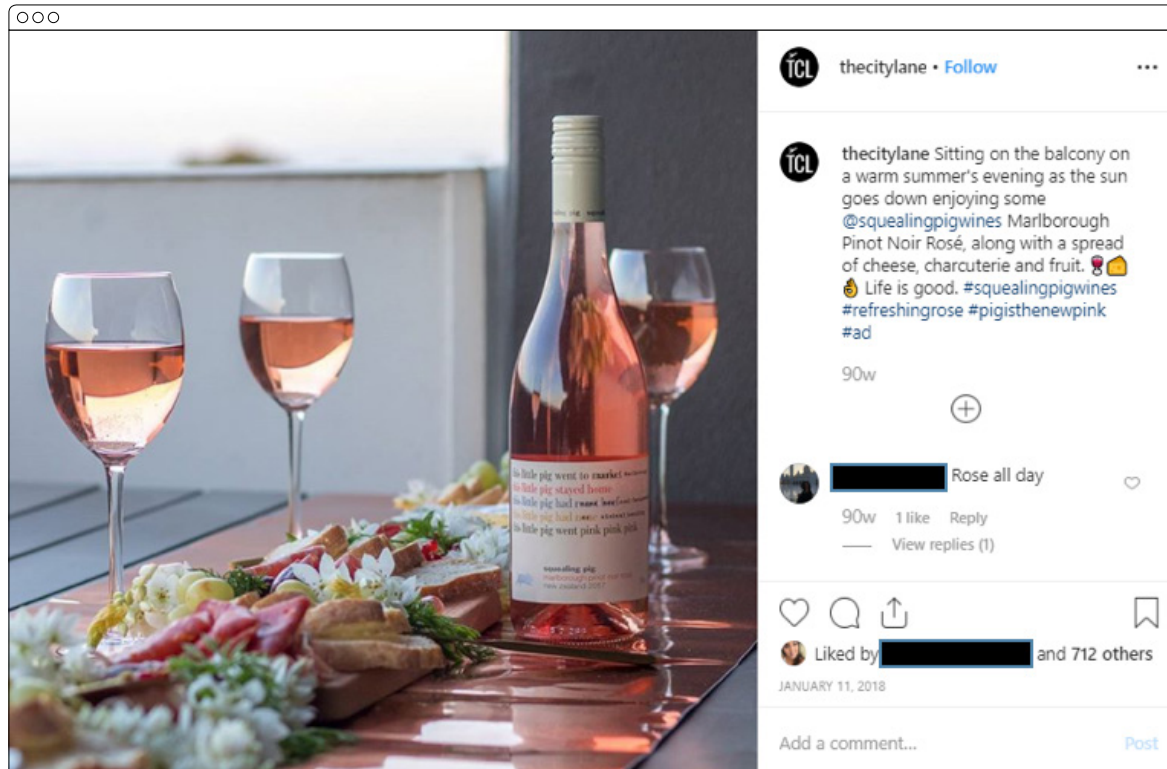
Source: Gordon's Gin Australia Facebook page.
Posted 2018 Dec 27, cited 2019 Oct 4.



Source: Gordon's Gin Australia Instagram account.
Posted 2019 Jun 14, cited 2019 Oct 24.



Source: @gemma_forsyth Instagram account.
Posted 2018 Dec 4, cited 2019 Oct 2.



Source: @thecitylane Instagram account.
Posted 2018 Jan 11, cited 2019 Oct 7.

“As much an accessory as a drink”

“Rosé is as much an accessory as a drink... It's incredibly marketable; the ultimate drink for the Instagram generation. Colourful, and generally drunk outdoors, rosé as a style has its own PR department built right in.”

My Wine Guy, National Liquor News December 2018

“The appetite for pink gin is going from strength to strength, while gin continues to be the fastest growing category in Australian spirits. We know our market wants an easy way to enjoy this trend that suits their lifestyle, and with Gordon's Premium Pink Gin & Soda we've made it easier than ever to enjoy this summer.”

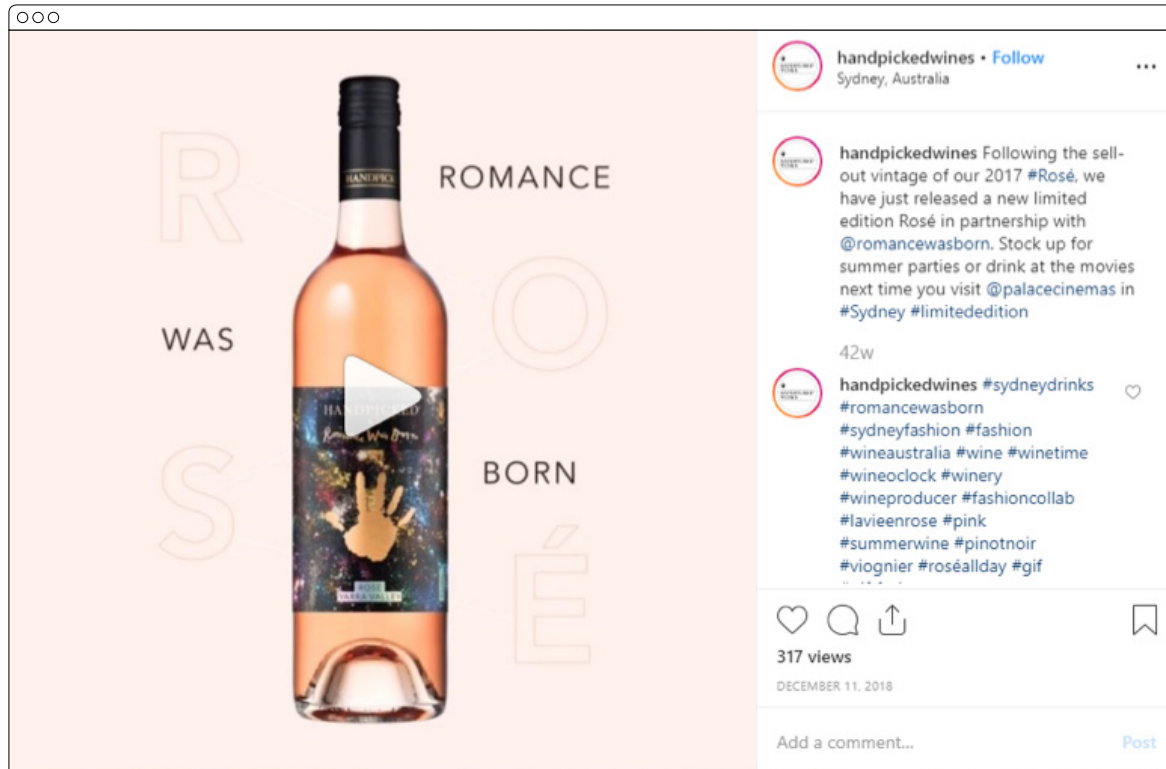
Diageo, National Liquor News October 2018

“What sets rosé apart is that it is on [sic] as much a wine as a lifestyle choice. Rosé is a segment where, unlike the rest of the wine world, variety and production methods are less important, with branding and packaging instead the key focus.”

National Liquor News, December 2018

“[The rosé] was our first fashion collaboration and it was such a success we decided to run it again for 2018. Fashion is a fun alignment for a category like rosé. Having designers like Romance Was Born, who are pretty quirky and out-there and have an influential following in Australia, helped it work. Their demographic aligns perfectly with a rosé crowd.”

Handpicked Wines, National Liquor News December 2018



Source: @handpickedwines Instagram account.
Posted 2018 Dec 11, cited 2019 Oct 24.



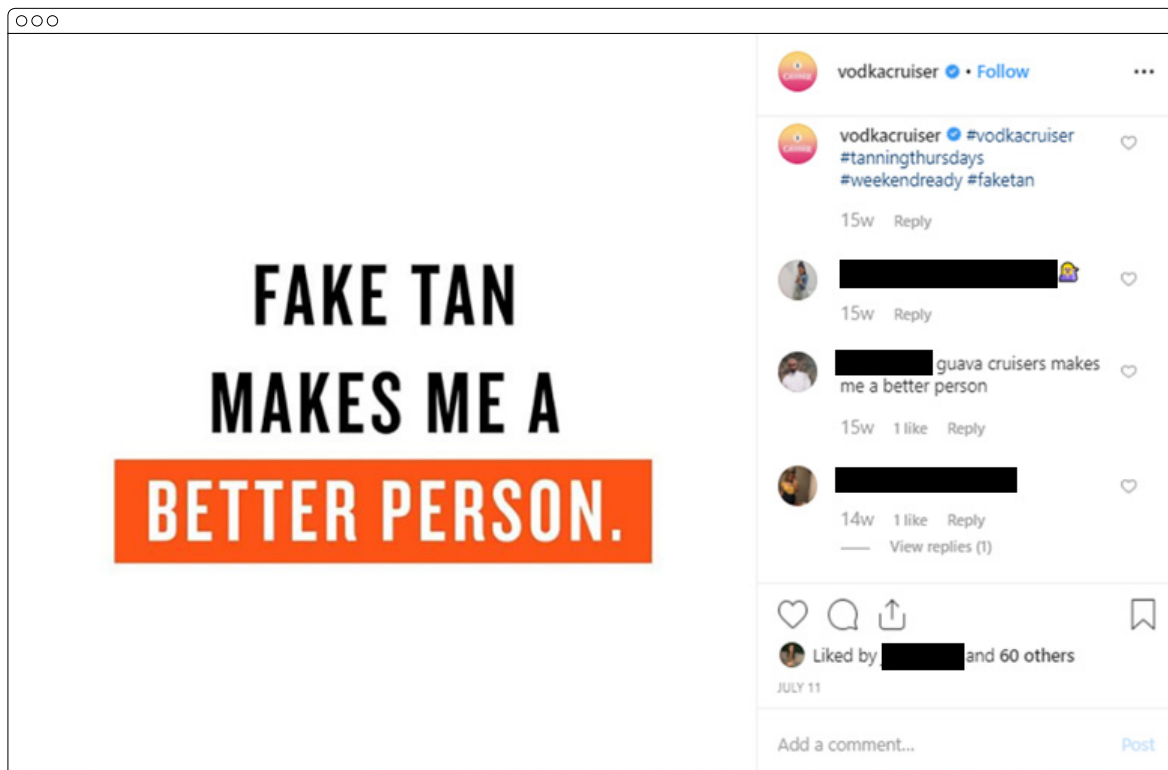
Source: Handpicked Wines Facebook page.
Posted 2019 Feb 28, cited 2019 Oct 7.



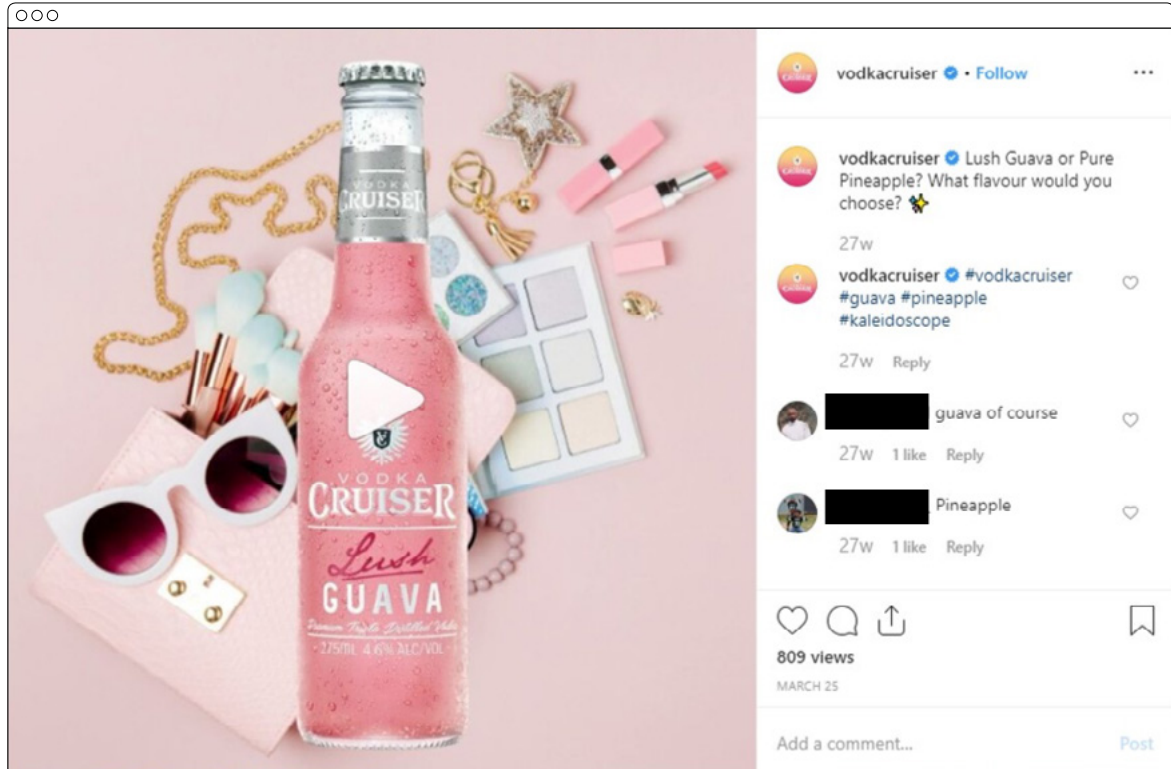
Source: Vodka Cruiser Facebook page.
Posted 2019 Sep 30, cited 2019 Oct 24.



Source: @clairpiya Instagram account.
Posted 2019 Sep 12, cited 2019 Oct 2.



Source: Vodka Cruiser Instagram account.
Posted 2019 Jul 11, cited 2019 Oct 7.



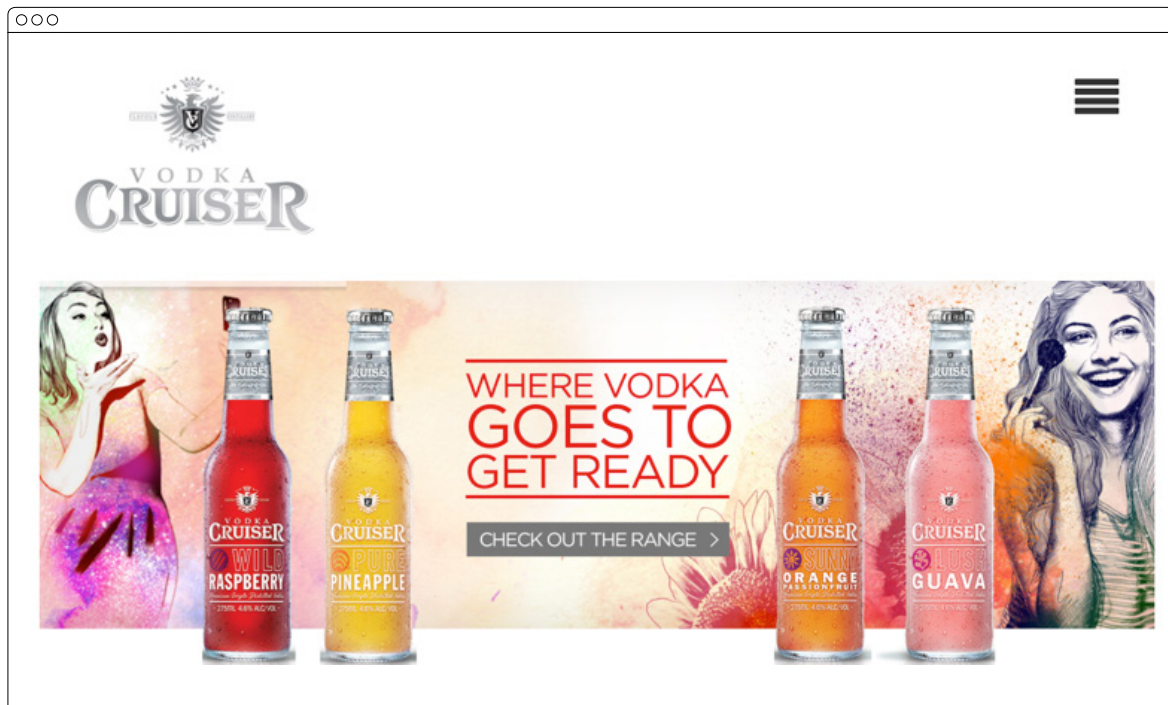
Source: Vodka Cruiser Instagram account.
Posted 2019 Mar 25, cited 2019 Oct 7.



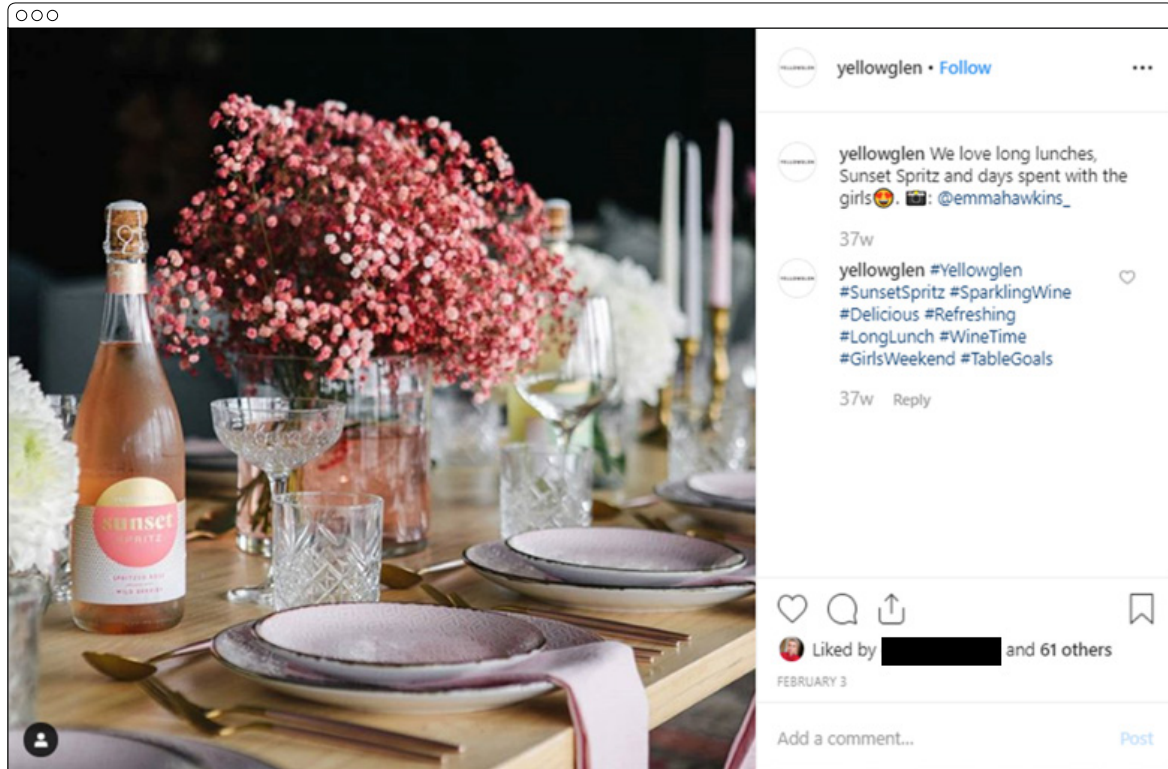
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Posted 2019 Sep 6, cited 2019 Oct 7.



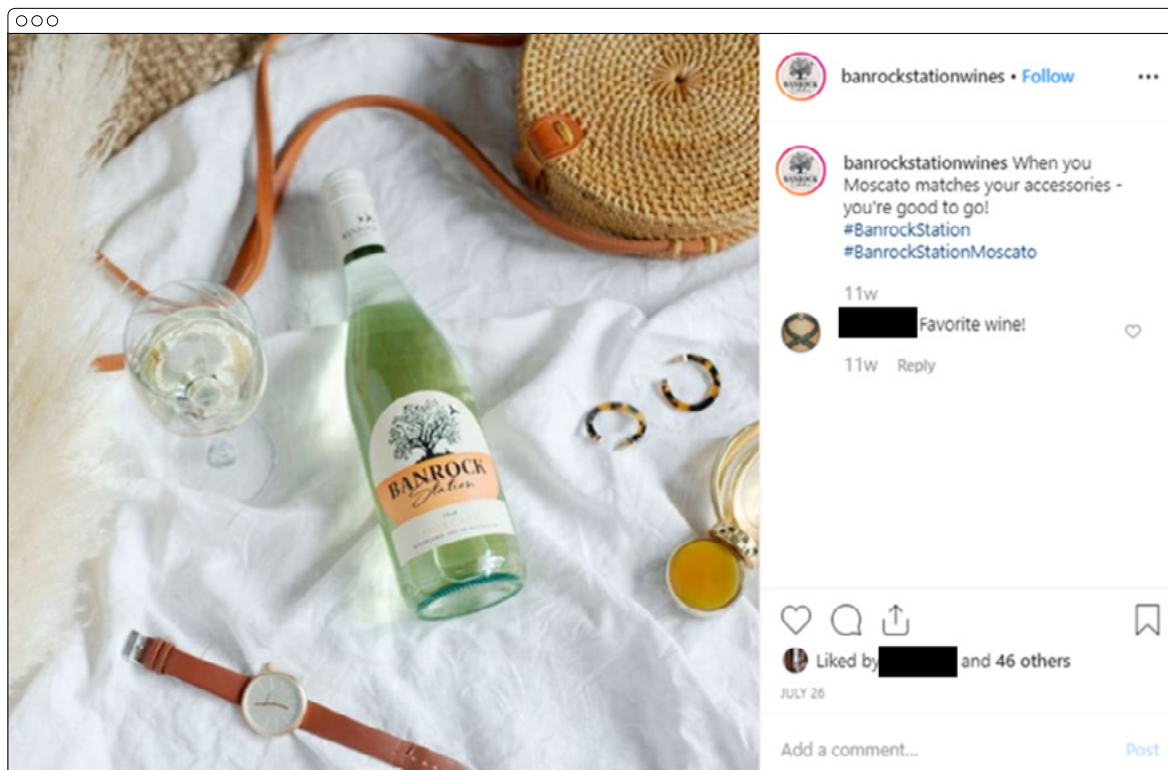
Source: Rekorderlig Cider Australia Instagram account.
Posted 2019 Sep 30, cited 2019 Oct 24.



Source: Vodka Cruiser website.
Cited 2019 Oct 24.



Source: Yellowglen Instagram account.
Posted 2019 Feb 3, cited 2019 Oct 24.



Source: Banrock Station Wines Instagram account.
Posted 2019 Jul 26, cited 2019 Oct 24.

“Better for you alcohol choice”

“Sitting alongside newer premium RTDs, like Tanqueray & Tonic and Gordon’s Pink & Soda, these pre-mix options are capitalising on the consumer interest in sugar restriction, refreshment and improved drinkability, making them vastly more appealing to health-conscious consumers looking for an easy drinking option in the fridge.”

National Liquor News October 2018

“The inspiration for our Blush Rosé comes from Australia’s love for pale rosé wines; it will give conscious consumers an alternative option this summer thanks to its lower sugar, which has been the driving force in our point of difference, containing only 119 calories a bottle.”

Rekorderlig, The Shout September 2019²⁷

“We promote K.Booch as a ‘Better for You Alcohol Choice’, with transparent labelling, lower ABV and lower sugar than your traditional RTDs or ciders.”

K.Booch, The Shout June 2019²⁸



Source: K.Booch Alcoholic Kombucha Instagram account.
Posted 2019 Oct 13, cited 2019 Oct 24.



Source: Rekorderlig Cider Australia Instagram account.
Posted 2019 Oct 6. Cited 2019 Oct 7.



Source: Rekorderlig Cider Australia Instagram account.
Posted 2019 Sep 25. Cited 2019 Oct 7.



Source: @djtigerlily Instagram account.
Posted 2018 Feb 12, cited 2019 Oct 24.



Source: @eclairpiya Instagram account.
Posted 2019 Oct 5, cited 2019 Oct 7.

Regulation of alcohol marketing aimed at women

Research shows the current system of alcohol marketing self-regulation in Australia is ineffective at preventing or adequately responding to inappropriate alcohol promotions.^{29,30} The Alcohol Beverages Advertising Code (ABAC) Scheme, a system funded and managed largely by the alcohol industry, sets out standards for the content of alcohol marketing in the ABAC Responsible Alcohol Marketing Code. This code does not apply specific standards to alcohol advertising that appeals to women, and as the examples below show, there is evidence of the code failing to adequately address the themes used to target women identified in this report.

Several complaints that have raised concerns about alcohol ads targeting young women have been dismissed by the ABAC Adjudication Panel. These include a Skyy Vodka promotion offering a free lip gloss with a 700ml bottle of Skyy Vodka³¹ and social media influencers promoting Smirnoff Pure on Instagram.³² There are examples of complaints being upheld by the ABAC Adjudication Panel, such as Vodka Cruiser Instagram posts featuring confetti, glitter, and the colour pink.³³ However, the images were posted in October 2016 and the complaint was not received until June 2017, highlighting a serious lack of monitoring by alcohol marketers and the ABAC Scheme.

International evidence highlights that alcohol marketing regularly breaches self-regulatory codes, and the codes are ineffective at protecting vulnerable populations.^{4,34} It has been suggested that a regulatory system that stipulates what alcohol marketers can do, rather than what they can't do, would be more effective in preventing inappropriate marketing.⁴ Given the significant body of evidence that highlights that the ABAC Scheme fails to adequately regulate alcohol marketing in Australia,^{29,30} there is a need for independent controls on alcohol marketing to be introduced.

Conclusion

It is evident that the alcohol industry in Australia is designing and promoting alcohol products specifically for women. The themes identified in this report highlight that products designed to appeal to women are often pink and palatable, use imagery that is highly likely to appeal to young women, and include health-related claims such as low sugar, low calorie, and natural ingredients. These themes are consistent with those identified in previous research that has found that the alcohol industry targets women through a number of strategies including the creation of new products, lifestyle messages underpinned by gender stereotypes, offers of stereotypical feminine accessories, and messages of empowerment.⁴

A significant number of women in Australia are drinking at risky levels. Of concern are the alcohol-related harms experienced by women such as breast cancer and the consequences of drinking alcohol during pregnancy. FASD has severe and lifelong consequences for our children, families, and communities. In 2012, the House of Representatives Standing Committee on Social Policy and Legal Affairs in their report *FASD: The Hidden Harm* stated, "Eliminating FASD will not be achieved by medication or vaccine, but by ensuring that every woman knows the risk through providing accurate health information and advice, and fostering a changed attitude to alcohol consumption during pregnancy and across the wider community."³⁵ Evidence-based policies that work to change attitudes to alcohol consumption include strong restrictions on the content, placement, and volume of alcohol marketing. With many pregnancies being unplanned, and the significant body of evidence indicating that alcohol promotion influences attitudes, decisions, and behaviours related to drinking,³⁶ there is a strong rationale to address alcohol marketing targeted at women as part of a comprehensive approach to reducing alcohol consumption, including among women of child-bearing age.

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