



27 January 2011

Committee Secretary
House of Representatives Standing Committee on Social Policy and Legal Affairs
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INQUIRY INTO THE REGULATION OF BILLBOARD AND OUTDOOR ADVERTISING

The Australian Toy Association is the national association representing manufacturers, distributors, retailers and suppliers in the toy, nursery and hobby industries. In the course of our activities developments relating to advertising and marketing to children are monitored on a regular basis. To the best of our knowledge there have not been any problems with toy advertising on billboards or other outdoor media and ATA would be very concerned if specific new regulation was proposed for this single channel of communication.

ATA believes it is in a good position to contribute to the Committee's inquiry on this reference because our members are subject to the opposite extremes of advertising regulation. The form of advertising most used by our members are television, which is subject to the detailed and prescriptive Children's Television Standard (CTS) administered by the Australian Communications and Media Authority (ACMA), and, at the other end of scale, catalogues which are subject to no specific content regulation.

To ensure that members maintain an appropriate level of behaviour commensurate with community expectations in their marketing and advertising activities particularly in media such as catalogues and outdoor the ATA Code of Practice includes the following:

“We are committed to the principle of ethical standards in regard to advertising to children and adhere to government regulations and requirements. . Further we agree to operate under the AANA Code for Advertising and Marketing to Children (May 2008)”

As can be seen from the above, a seamless network of regulation and self-regulation operates in relation to advertising and marketing to children. There is specific regulation in areas such as television and broad agreement to abide by the AANA system where self-regulation operates. As billboards and outdoor advertising tend to be used as part of a larger marketing or communication program, ATA cannot see how a separate set of rules is either necessary or desirable. In fact, as the number of channels of communication proliferates, it is in the interests of consumers and business alike for there to be a convergence rather than a proliferation of regulation.

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As the Committee will undoubtedly be made aware in other submissions, AANA is in the process of reviewing its overarching Code of Ethics. ATA has participated in that review process which is being conducted by an independent reviewer. ATA's main concern has been to ensure that AANA's codes are updated to cover the increasing use of digital media and online channels.

ATA urges the Committee to avoid new and separate regulation for a specific channel of communication and look towards channel-neutral self-regulatory solutions.

For further information, please contact the undersigned.

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