

**To: Liquor Project Manager
Law Commission**

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We wish to make a submission on the report “Alcohol in our lives” on behalf of GALA (Group Against Liquor Advertising). This is a follow-up to our previous submission. The contact person for our group is:

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We congratulate the Commission on “Alcohol in our lives”, which we shall refer to as the Report, and the detailed information provided. However, we feel that the range of recommendations are weak in a number of areas that we wish to address, namely advertising and sponsorship, labelling, and the role of the Advertising Standards Authority (ASA). As others will be commenting on other aspects of the report, we shall confine ourselves to these items.

In the past, the idea of a complete ban on alcohol promotion was considered to be a fringe view. However, it is now being advocated by the World Health Organisation, the British Medical Association and by many other health experts

In summary, our recommendations are as follows along with our responses in brackets to the questions asked in Chapter 12 and our response to options in Chapter 13:

1. Ban all alcohol advertising in all communication media, including electronic media such as the Internet and cell-phone. The Bill of Rights would not be contravened by this. (Our response to question 1 is ‘no’ and to 22 is ‘yes’. Our option choice in Advertising Options on page 239 is (e). Under Off-Licence Product Options on Page 237 we support (d); at the very least we support restricting the sale of undesirable liquor products.)

2. Ban all sponsorship of sporting and other public events by the liquor industry. (Our option choice in Promotions Options on page 239 is something along the lines of (b) and (c).)

3. Introduce compulsory labelling with nutritional information and health warnings on all alcohol packaging. Any allowable advertising, including advertising at the point of sale, should also contain health warnings. (Our response to questions 3 and 4 is ‘no’ and our option choices on Product Labelling on page 237 are (d) and (e).)

4. Replace ASA’s role in monitoring the advertising and promotion of alcohol, by an independent body. (There are no questions or options about the complaint process.)

The Report discusses the harm from alcohol in great detail. It asks the question (Q.6 on Page 230) about individual responsibility and a conducive environment, but fails to mention the fact the industry takes no real responsibility for what it does; our answer is 'no'. In referring to our "drinking culture," the Report raises two questions: What keeps the culture going and how might it be reversed? The Report suggests that there are several complicating factors yet is very soft on advertising and sponsorship in spite of the fact that both local and international research has shown that advertising is a major contributing factor. (1)(2) It is reasonable to compare alcohol with tobacco, as the global risks are comparable, depending on the type of population being considered. (22) For example, in terms of disability adjusted life years (DALYs), alcohol has the highest risk factor ahead of tobacco in developing countries with low mortality and, given the statistical errors that will be involved, it is close behind tobacco in developed countries. The results are very similar in New Zealand, though it is difficult to make an accurate comparison from the data. (2)(3)

The arguments for each recommendation as above are as follows. Please also see our earlier submission to the LC, prior to the release of the Issues paper.

1. Ban all alcohol advertising in all communication media, including electronic media such as the Internet and cell-phone.

To see the effect on lack of regulation one only has to look at Thailand. (3) A number of countries have total or partial bans (4) and various changes are being introduced in various countries to minimize harm from alcohol right now. For example, in Ireland there is a new code of practice to govern the retail sales of alcohol. (5) A NZ Herald news report (10-9-09) says:

"British doctors called for a ban on alcohol advertisements, saying the move was necessary to challenge Britain's dangerous drinking culture. The British Medical Association argued in a report that a rapid increase in alcohol consumption among young Britons in recent years was being underpinned by 'clever alcohol advertising' and that a prohibition on alcohol-related publicity was needed to help turn the situation around.' Our society is awash with pro-alcohol messaging and marketing,' Dr. Vivienne Nathanson, the association's head of science and ethics, said."

For more information about the U.K. scene see the BMA document entitled, "Under the influence: The damaging effect of alcohol on young people." (6)

In a key article, Anderson and colleagues state that the banning of alcohol advertising is both effective and cost-effective way in reducing harm. If more stringent alcohol policies are not put in place, global alcohol-related harm is likely to continue to increase. (7) They also state that:

"The effects of exposure seem cumulative and, in markets with greater availability of alcohol advertising, young people are likely to continue to increase their drinking as they move into their mid-20s, whereas drinking decreases at an earlier age in people who are less exposed to it."

The recent WHO working document says that (p. 16), “*Reducing the impact of marketing is an important consideration in reducing harmful use of alcohol*”, and “*It is very difficult to target young adult consumers without exposing cohorts of adolescents under the legal age to the same marketing. The exposure of children and young people to appealing marketing is of particular concern*”. (8)

The Report says on page 20 that “*The pleasure and sociability connected with drinking is clearly a major social benefit derived from alcohol.*” This might be true for the sensible drinker, but for others we would challenge this on the basis of three facts from the Report:

1. The consumption of higher strength beer is on the increase (p. 20).
2. RTDs are increasingly popular among young people, especially young women (p. 21).
3. Young people below age 18 are drinking more (p. 38).

We cannot see what this has to do with “*pleasure and sociability*”; getting blind drunk is not being sociable. It says more about clever marketing, which can help produce peer pressure, and the addictive properties of alcohol, than anything else.

Youth are deliberately targeted with clever marketing strategies because they are the drinkers of the future and the drivers of the drinking culture. (14) There is clear evidence that alcohol is neurotoxic to brain development, leading to structural hippocampal changes in adolescence. (21) Therefore, given that brain development is not complete until into the 20s, the current widespread binge drinking by students will have a serious future effect.

The Report (p. 99), after describing modern marketing techniques and how “*many alcohol brands and promotional campaigns may remain invisible to all but the target market*”, comments that “*Social networking sites are used to share extreme drinking exploits.*” Examples are also given of how websites (e.g., Facebook and Bebo) are employed to target young consumers and offer free beer vouchers. (If you really want to see how Facebook breaks its own rules on alcohol see the extensive article (28).) We then have the statement:

“While none of these marketing tools can be said to ‘cause’ the harmful use of alcohol, the highly creative and all-persuasive use of popular culture to build connections between personal identity and brands is a powerful new environmental factor seeking to influence individual choice around alcohol use.”

The word ‘cause’ was bandied about by tobacco protagonists until it was clear that the evidence was overwhelming. The same is now true of alcohol where the evidence of ‘cause’ (some of which is referred to by the Report in A 29, p. 264) is now very strong and is steadily growing. One of the problems, for example, in teasing out evidence is that there are some factors such as per capita consumption that can blur the association between alcohol control policies and youth alcohol consumption. (31) However, there is clear evidence that the younger they start drinking the more they drink later. (1) Such websites, especially those sponsored by the alcohol industry, need

to be banned. A good example of how the liquor industry operates is the role of Lionzone set up by Lion Nathan. (15) This has moved to new premises opening in November and, as in the past, will host brewery tours (with free samples of course) and put on a beer school that will “host a practical night course in personal brewing.” Lion Nathan has previously sponsored educational visits from secondary schools as part of an NZQA Unit standard called “Demonstrate and apply knowledge of business production processes.” The process could be seen from a viewing platform constructed by the brewery. No doubt this will continue at the new site. Given that binge-drinking patterns develop at secondary school age, this attempt by the brewery to connect with our youth is nothing but a blatant form of advertising. Would there be the same support for this if it were a tobacco company? To see what the liquor industry really does, the reader is referred to Bond et al. (16) who list the 10 top alcohol industry concerns, which include controls on advertising and sponsorship. The industry lobbies against effective strategies and supports ineffective strategies! (3)

What about *adequate* alcohol education at school level? If there is any, it is certainly not working. There is nothing in the Report about this. We appreciate that syllabuses are already extended, but the mental health of our youth is at stake here.

We believe that the Bill of Rights would not be contravened if the above was introduced and we now give arguments to show this.

Section 14 of the Bill of Rights (1990) states that:

“Everyone has the right to freedom of expression, including the freedom to seek, receive, and impart information of any kind in any form.”

This has been interpreted by the commercial world and several overseas courts to give freedom to impart information and opinion by advertising. “Everyone” is interpreted to include individuals and ‘legal persons’ such as corporations.

Section 5 of the Bill of Rights states:

“the rights and freedoms contained in this Bill of Rights may be subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society.”

The challenge is to determine the ‘reasonable limits’ and how they can be ‘demonstrably justified’ in relation to alcohol advertising.

Dr David Collins, barrister (now Solicitor-General), referring to a Canadian Supreme Court case of *R v Oakes* (1996) put forward the following arguments in an address to an ALAC conference in 1996:

“Two broad criteria were set out to guide courts in determining whether or not a limitation is ‘demonstrably justified in a free and democratic society’. The criteria set out by the Supreme Court were
1. That the objective which the limit is designed to achieve must be of significant importance to warrant overriding the right or freedom that is otherwise protected and

2. That the measure chosen to achieve the objective must be proportional to the objective.”

The objective of limiting advertising is to reduce the harm from alcohol to society, particularly to young people. Dr Collins thought that this criterion was met by a ban on alcohol advertising. Mr. Chris Finlayson, present Attorney-General agreed with this in relation to the Liquor Advertising Bill 2009. (Alcohol in our Lives 10.69)

In relation to the second criterion of proportionality, Dr Collins quoted from a Canadian case

“ the right to freedom of expression is not absolute and can not, in all cases override other rights and values. Although freedom of expression is undoubtedly a fundamental value, there are other fundamental values that are deserving of protection.”

He stated that courts had identified ‘core rights’ and distinguished them from other forms of expression that will not be protected. The latter include advertisements and publications relating to prostitution, hate mongering and pornography that receive little or no protection under Section 14.

“Because of the harm generated by alcohol, and the profit motive underlying its promotion it can be argued that alcohol advertising has much in common with expressions which promote prostitution and pornography. For these reasons it can be argued that alcohol advertising deserves a very low degree of protection under the NZ Bill of Rights and that the Act does not preclude a ban on alcohol advertising.”

The present Attorney-General thought the test of proportionality was not met in relation to the Liquor Advertising (TV and Radio) Bill. (Section 10.7)

Professor Grant Huscroft, University of Western Ontario, Canada, provided an opinion on the NZ Bill of Rights and broadcast alcohol advertising, while he was visiting professor at Auckland University School of Law in 1996. He states that *“commercial expression has never enjoyed protection to the same extent as other forms of expression”*, and quotes several legal cases as evidence. He continues, *“Unlike other forms of expression, commercial expression is routinely regulated on the basis of content.”* With regard to the objective of the limitation he says, *“ in my view the objective is sufficiently important to justify limitation of commercial expression.”*

He concludes that a ban on broadcast alcohol advertising has a rational connection with the objective and that an exacting standard of proof of the effectiveness of a ban is not required.

“A strict application of the proportionality analysis... would place an impossible onus on Parliament by requiring it to produce definitive social scientific evidence respecting the root causes of a pressing area of social concern every time it wishes to address its effects. This could ...virtually paralyze the operation of government in the socio-economic sphere.” RJR MacDonald

Finally, he states that

“a legislative prohibition of alcohol advertising on television and/or radio would not be inconsistent with the Bill of Rights, and the Attorney-General would not be required to report to Parliament under s 7.”

GALA’s conclusions

1.1 There is overwhelming evidence of the connection between alcohol advertising and excessive consumption. The most recent is from the Science Group of the European Alcohol and Health Forum that reviewed 13 longitudinal studies and found that exposure to marketing was related to alcohol use in a quantitative manner. (27)

1.2 The NZ Bill of Rights does not override other legislation. It has been overridden in the Films, Videos and Publications Classification Act.

1.3 The opinion of the Attorney-General is advisory only.

1.4 Commercial expression is not entitled to the same protection as other forms of expression.

1.5 It is a legitimate objective of Government, and now a compelling duty, to protect the health and safety of the community.

2. Ban all sponsorship and promotion of alcohol by the liquor industry at all sporting and public events and encourage other business support. Any allowable advertising, including advertising at the point of sale, should also contain health warnings.

Sports promotion by the liquor companies, which surprisingly does not appear to be mentioned in the Report, will be a contentious issue because of the level of funding. Yet what kind of message is it sending to our youth, given all the high-profile players in Rugby and League involved with drinking incidents? O’Brien and Kyprri (17) state that:

“Alcohol industry sponsorship of sportspeople, and in particular the provision of free or discounted alcoholic beverages, is associated with hazardous drinking after adjustment for a range of potential confounders. Sports administration bodies should consider the health and ethical risks of accepting alcohol industry sponsorship.”

In commenting on this paper, Rehm and Kanteres (18) note that those authors *“demonstrate that sponsorship and advertising seem to have similar results, in that consumption is increased”* and that sponsorship is a marketing method similar to advertisement. They should therefore be treated similarly. France grasped the nettle and banned alcoholic sponsorship of sport and survived. Why can’t we? Also, many sports are now sponsored by non-alcoholic organisations, for example:

- In the UK, commercial banks are the main sponsors of football, tennis, and cricket.

- ANZ sponsors the netball league in Australasia and a press release (29-03-08) says, “*The ANZ Bank's involvement with new competition is believed to be the biggest sponsorship deal for women's sport in Australasia.*”

- Justin Vaughan, CEO of New Zealand Cricket, recently said, “*We enjoy long-term relationships with iconic brands such as the National Bank, Milo, Canterbury of New Zealand, Samsung and Gillette and we've also recently signed a major international sponsor, DEC.*”

- Ford New Zealand has sponsored the national team and the Super 14 rugby franchises for 15 years.

- Getting down to a local level, for example, “*The Waiuku League Club is serious about an alcohol-free environment, and is even replacing the current alcohol brand sponsored goal post pads.*” (19)

- Otago university has banned alcohol advertising and sponsorship from its events (Otago Daily Times). (30) The ban is believed to be the first of its type in New Zealand.

Australia is under pressure to do something about alcohol sponsorship of sport. (20) It is interesting to note that one of the Key Action Areas from the report of the Australian National Preventative Health Taskforce is to regulate alcohol promotion. (29) Many other examples can be given. There is life after the death of alcohol sponsorship!

Consistent with the ban on tobacco industry sponsorship, the promotion of sporting and other recreational and cultural events by the liquor industry should be banned in New Zealand, as it is in France. On page 81, the Report mentions the Bill of Rights and freedom of expression, yet the same notions were not extended to the tobacco industry on less evidence. How does the Bill apply when innocent drivers who may be busy going about their business are stopped for breath testing? (We approve of random testing.)

We realise that New Zealand has a history of alcohol intemperance, so that advertising and sponsorship are not the only sources of beliefs and attitudes. However, any programme that does not tackle their influence and alluring promises is bound to fail. One of the most significant papers on this whole subject is by Massey University's Auckland researcher, Professor Sally Casswell (3). This summarizes much international research, and supports our views on advertising and sponsorship bans, as well as describing the radical moves that governments will have to make to have any effect on this now serious international problem.

3. Introduce compulsory labelling with nutritional information and health warnings on all alcohol packaging.

GALA is of the view that the labelling of alcoholic beverages is inadequate and this results in a lack of knowledge by New Zealanders of the health risks of alcohol

ingestion. We consider nutrition and health warnings separately, although they are related.

(a) *Nutritional Information Panels (NIPs)*

- Alcoholic drinks, which are classed as a food, are the only product excluded from the requirement to have NIPs on the container. It is not clear from contact with the Food Standards Authority of Australia and New Zealand (FSANZ) how this situation has arisen.
- Obesity is a major health problem in NZ. Personal clinical experience has shown that weight loss is common in overweight, regularly drinking persons, if they start a programme of avoiding alcohol intake, without making other substantial changes in lifestyle. As alcohol is not labelled with its calorie (energy) content (7 calories/gram of alcohol, one standard drink contains 10g of alcohol), consumers cannot make an informed choice about alcohol consumption.
- Some weight conscious women deliberately do not eat food before a drinking session, as they are vaguely aware that alcohol can be fattening. A lack of food enhances the absorption of alcohol and contributes to intoxication with its consequent social and health risks
- There have been listed 58 additives, including charcoal and clay, involved in the making of wine (some of which are not in the finished product). (25) The lack of information on wine labels is under fire in England.
- Many new forms of alcoholic beverages now are presented in a variety of colours. There is no indication on labels as to the flavouring or colouring added.
- The FSANZ states: “nutrition labelling can and does serve as a useful tool in relation to public health, and is essential for informed choice by consumers.” We agree with this.

It is therefore logical to ensure that all alcoholic drinks have NIPs labels.

(b) *Warning labels on alcoholic beverages.*

Alcohol is a poisonous although legalised drug. However, despite other poisonous substances having warning labels such as over the counter drugs, tobacco, etc., no such labels are required for alcohol, which is just as dangerous.

- Other non-alcoholic beverages are required to have health warnings placed on the container, for example, Coca-Cola (phenylalanine) and Red Bull (dose of caffeine). The effects of alcohol on health and pregnancy are well documented in Chapter 6 of the Report.
- Many countries require warning labels on alcoholic drinks. For the most part these labels are usually small, sometimes unreadable and the wording is not standardised. Some countries such as the USA require a visual warning notice to be displayed wherever alcohol is offered for sale.
- Export alcoholic beverages from NZ to many countries are required to be labelled with warnings. It is therefore evident that liquor producers would have no great problem in producing them for the NZ scene.

For these reasons it seems reasonable to ensure that warnings are placed on alcohol containers even though the exact wording may be controversial (as for tobacco). Although general population education may be feasible regarding these risks of alcohol consumption, experience has shown that it is not very effective, with many consumers still unaware of the health risks of alcohol. Rotating, adequately sized warnings on alcohol containers may greatly increase the knowledge of alcohol risks to the consumer, but only if such labels are large enough to be read easily and if they are worded in simple language. Over a period of time, such notices will upgrade the general knowledge of individuals regarding the risks of alcohol ingestion.

It is appreciated that some scientific studies have not found a direct relationship between such warning labels and alcohol consumption. This is probably because of the small size of the labels and the difficulty of ascertaining a direct relationship with a single factor, as so often other confounding factors are present. However, some warning labels exist in the US and are coming in the UK. (26) With tobacco, warning labels have decreased smoking by an estimated 9% in NZ.

The present system of changes in labelling requirements through Food Standards Australia and New Zealand (FSANZ) is frustratingly slow and takes years. The Public Health aspects of alcohol problems are not dealt with adequately by this procedure; indeed NZ has a minority voice on the organisation and therefore cannot at present make unilateral changes in matters related to food labelling even though it may be in the National interest. In our view, changes in procedures are needed and the Law Commission should recommend this.

4. Replace ASA's role in monitoring the advertising and promotion of alcohol by an independent body.

The Report states on page 180 that: "*The self regulation system of alcohol advertising is widely complied with*", yet history shows that the liquor industry cannot be trusted and self-regulation does not work (e.g., France's experience, which led to the Loi Evin (9)). The Irish Times (6-10-2007) stated that "*a report from the European Commission confirms that voluntary advertising codes and self-regulation by the drinks industry are not working.*" However, the Report does point out the weaknesses of the current approach with statements such as the following (p. 180, section 10.62):

"It is possible that a regime that relies on complaints may not prevent irresponsible advertising. One particular concern is that while self-regulatory systems are capable of blocking advertisements that would breach the strict wording of voluntary codes, they may not filter out advertisements that appear at odds with the underlying spirit of the restrictions."

It mentions that criticisms like this have been made in Australia and "*Arguably, these same criticisms could be made in this country.*" It then comments on local sexually provocative material that suggests a link between liquor and sexual attraction or performance, which is contrary to the code. The Liquor Industry is deliberately deceptive. They publicise that they have an honourable Voluntary Code that says they will not imply that alcohol will bring social or sexual success. (This is acknowledged internationally to be an unfair spin to throw at teenagers.) Then they promote the sexy

Miss Tui competition, provocative billboard advertisements, sophisticated wine ads in the social pages of glossy magazines, and on TV bikini-clad brewer workers. The code is knowingly and constantly broken and it is used as a front in public discussion to claim how sincere they are. This callousness demonstrates that they can never be trusted with so-called "enforced self-regulation".

The section on advertising (p. 225) includes the statement:

“The Law Commission favours leaving the main bulk of the regulation to the Advertising Standards Authority.”

Do we want to give this kind of power, given governments' past failures? The ASA has not been able to promote responsible advertising and ministers have taken no appropriate action as the government does not have any representation on the Authority. The pre-vetting system LAPS (10), which is again voluntary, also seems to be ineffective, for example, the original Tui website was LAPS approved as were a number of other advertisements for which GALA had complaints upheld. According to LAPS, it is the responsibility of the advertiser to ensure that their ads comply with ASA Codes and LAPS provides only an advisory and approval service. This is a very weak form of control.

To complain to the ASA is not easy as the process is very slow. For example, one of our members Cliff Turner had a complaint upheld after 10 months waiting and three appeals. Not only is the process slow but the culprit if found guilty gets off free, apart from having to withdraw the offending material, which has already done its damage. Moreover, there appears to be no real penalty for a transgression. The international evidence is that self-regulation does not work so we need appropriate bans along with appropriate penalties administered by a neutral public body. (11)(12) We are told that the ASA is working well, working well at achieving what? Who would bother complaining when there are so many hurdles to jump over? Also, it is well known that our own pubs promote excessive drinking, which is against the law. (13) (24) In our view a complete revision of the ASA system is required and it would not be in the public interest if the *status quo* was maintained.

References

1. Group Against Liquor Advertising (GALA) Fact Sheet. Available at: http://gala.org.nz/fact_sheet_gala.pdf
2. Snyder L.B. et al. Effects of alcohol advertising exposure on drinking among youth. *Arch Pediatr Adolesc Med* 2006; 160: 18-24.
3. Casswell, S. and Thamarangsi, T. Reducing harm from alcohol: call to action. *Lancet* 2009; 373: 2247–2257. See panel 1. This is an excellent article and should be consulted.

4. For a list of European countries see http://www.eucam.info/content/bestanden/overview-tv-bans-alcohol-advertising-europe_march-27-2009.pdf
5. http://www.rrai.ie/code_explanatory_guidelines/default.97.html
6. “Under the influence: The damaging effect of alcohol on young people.” BMA. http://www.bma.org.uk/images/undertheinfluence_tcm41-190062.pdf
7. Anderson P. et al. Effectiveness and cost-effectiveness of policies and programmes to reduce the harm caused by alcohol. *Lancet* 2009; 373: 2234–2246.
8. “Working document for developing a draft global strategy to reduce harmful use of alcohol (WHO).” http://www.who.int/substance_abuse/activities/msbwden.pdf
9. A. Rigaud and M. Craplet. “The ‘Loi Evin’ : a French exception”. http://www.ias.org.uk/btg/conf0604/papers/rigaud_craplet.pdf
10. <http://www.anza.co.nz/?q=prevetting/laps>
11. Chung P.J. et al. Association between adolescent viewership and alcohol advertising on cable television. *Am J Public Health* 2009 Aug 20. [Epub ahead of print]
12. Fielder L. et al. Exposure of children and adolescents to alcohol advertising on Australian metropolitan free-to-air television. *Addiction* 2009; 104: 1157-1165.
13. See, for example, http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=10594001
14. See for example <http://www.medicalnewstoday.com/articles/161396.php>
15. <http://www.lionzone.co.nz/news.asp?view=24>
16. Bond L. et al. Access to confidential documents: From ‘big tobacco’ to ‘big booze.’ *Australasian Med J* 2009;1(3):1-26.
17. O’Brien K.S. and Kypri K. Alcohol industry sponsorship and hazardous drinking among sportspeople. *Addiction* 2008;103: 1961-1966.
18. Rehm J. and Kanteres F. Alcohol and sponsorship in sport: Some much-needed evidence in an ideological discussion. *Addiction* 2008;103:1967-1968.
19. Waiuku and Districts Post, 8-9-2009.
20. See <http://www.theaustralian.news.com.au/story/0,25197,25284075-12377,00.html>
21. Faden V.B. and Goldman M. The effects of alcohol on physiological processes and biological development. *Alcohol Res Health* 2005; 28: 125-32.

22. See the WHO report of 2002 at http://www.who.int/whr/2002/en/whr02_ch4.pdf pages 81-82, Figs 4.8 and 4.9 or Section 11 at <http://www.who.int/whr/2002/chapter4/en/index10.html>

23. See the 1990 comparison by Easton (<http://www.eastonbh.ac.nz/?p=59>) then note the current trends in alcohol consumption and cigarettes (<http://www.stats.govt.nz/~media/Statistics/Browse%20for%20stats/AlcoholAndTobacco/HOTPDec08/alcoholandtobaccoavailableforconsumptiondec08hotp.ashx>) along with the smoke-free regulations.

24. <http://www.stuff.co.nz/national/2883395/1-Undie-500-beer-promo-irresponsible>

25. <http://www.telegraph.co.uk/news/uknews/5027710/Wine-ingredients-including-fish-and-charcoal-should-be-listed-on-the-bottle-say-regulators.html>

26. <http://www.dailymail.co.uk/news/article-1215175/Labour-ministers-accused-soft-alcohol-warnings.html>

27.

http://ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/docs/science_o01_en.pdf28. <http://www.globaldrugpolicy.org/3/3/1.php>

29. <http://www.yourhealth.gov.au/internet/yourhealth/publishing.nsf/Content/NPHS>

30. “Otago Uni bans alcohol advertising.” http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=10603114&ref=emailfriend

31. M.J. Paschall et al.. Alcohol control policies and alcohol consumption by youth: a multi-national study. *Addiction*, (2009):**104**, 1849–1855.

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