

19 November 2010

## **THE COMPPS RESPONSE**

### **TO THE DEPARTMENT of HEALTH and AGEING CONSULTATION PAPER:**

### ***Expansion of the National Binge Drinking Strategy (NBDS) – Community Sponsorship Fund***

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## **INTRODUCTION**

COMPPS welcomes the opportunity to provide a submission to the Department of Health and Ageing's (DoHA) invitation to comment on the eligibility for funds and administrative functions of the NBDS Community Sponsorship Fund.

In May 2010, COMPPS commissioned an external review of academic literature (peer reviewed), which examined the impact of alcohol sponsorship and advertising (in sport and more generally). The key findings of this review were as follows:

- We noted and concurred with the National Preventative Health Taskforce's 2008 report<sup>1</sup> to the Australian Government, that the types of intervention considered to be most effective in best practice prevention of alcohol-related harm are, in order:

- 1) Regulating physical availability;
- 2) Taxation and Pricing;
- 3) Drink-driving Countermeasures; and
- 4) Treatment and Early Intervention.

The types of interventions for which there is somewhat less evidence of effectiveness are, in order:

- 5) Altering the Drinking Context;
- 6) Regulating Promotion; and
- 7) Education and Persuasion.

- In the assessment framework used in the 2008 National Preventative Health Taskforce Technical Report, the Australian evaluation of the effectiveness, breadth of research, cross-cultural testing of advertising bans and advertising content controls determined that this area of intervention warranted further research due to the limited evidence of effectiveness, particularly in an Australian context. COMPPS acknowledges the recent announcement of the Australian Research Council's funding of a Linkage Project by and between the University of Queensland and the Australian Sports Commission. This project is to examine the association of sport by alcohol brands and consumption behaviour in target youth and sportspeople. COMPPS welcomes this study and will, as required assist the project partner organisations with relevant information and insights.



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<sup>1</sup> National Preventative Health Taskforce: *Technical Report No.3- Preventing Alcohol-Related Harm in Australia: A Window of Opportunity* (2008)

- The impact of alcohol advertising on young people is an area where there has been considerable research - but of somewhat poor quality, yielding conflicting results that range from positive associations between young people exposed to alcohol advertising and an increased risk of harmful alcohol consumption, to negative associations or inconclusive results.
- There is a convergence of thinking among health experts and researchers that no single strategy can offer a 'quick fix' or 'silver bullet' to the prevention of harmful consumption of alcohol. A review of international research concluded that an integrated approach is required that includes a combination of strategies that are known to be effective and suitable for the particular context in which they are implemented. Solely banning alcohol sports sponsorship would have minimal effect on levels of alcohol misuse by younger people.

The review of literature highlighted the conflicting evidence which exists in research and writing on the topic. It is an extremely complex area where the cultural and behavioural drivers for alcohol misuse vary significantly dependent on the context and the individual circumstances. Finding an evidence-based causal link between alcohol advertising/sponsorship and younger people who engage in binge drinking will be difficult to prove conclusively due to the complexity of the issue.

## **THE COMPPS' POSITION ON ALCOHOL MISUSE**

COMPPS is generally supportive of the Australian Government's NBDS and strongly supports the position of the government to engage with the major sporting bodies as a partner in tackling the societal issue of alcohol misuse.

There is consensus amongst the COMPPS members to reserve the right for themselves and affiliated members (including local sporting bodies) to continue their association with sponsorship from alcohol producers - so long as this form of sponsorship remains legitimate. **The culture of binge drinking by young Australians is the key underlying issue of the preventative health message on alcohol-related harm in Australia. The issue is not alcohol sponsorship of sport.** Sport should not be unfairly distinguished from all other activities in which "younger people" are engaged, i.e. concerts (including music festivals), fashion shows, film festivals and social networking. Many of these activities are or could be sponsored by alcohol brands, and as such, selectively banning alcohol sponsorship in sport will not solve the problem of binge drinking or meaningfully limit teenagers exposure to alcohol messaging.

The COMPPS' joint position on alcohol misuse by younger Australians is to focus on a small number of high quality, relevant and evidence-based effective interventions where sport can provide direct influence or implementation and/or provide access to a medium for non-direct interventions, which are proven to be effective and suitable for the particular context in which they are implemented. This is in addition to the existing programs and initiatives currently delivered by and between the COMPPS members to the broader community, sporting clubs and professional athletes.

COMPPS welcomes the opportunity to be part of the solution to assist the Australian, State and Territory Governments and community organisations with the implementation of evidence-based best practice interventions, which provide demonstrable impact on the reduction of alcohol misuse by younger Australians.

**MALCOLM SPEED**  
EXECUTIVE DIRECTOR

## RESPONSE TO KEY ISSUES IDENTIFIED IN THE CONSULTATION PAPER

### *ISSUE 1: Information about the operational context of community sporting and cultural organisations, and the impact of these contexts on the appropriate size, duration and timing of grants.*

Questions on which the Department seeks input:

- **Are you responding as an umbrella or peak body, representing a number of organisations?**  
COMPPS is the peak industry body for Australia's seven major professional and participation sports.
- **What proportion of these organisations do you estimate would receive sponsorship money from alcohol companies?**  
The proportion of the COMPPS community sporting clubs and associations who receive sponsorship money from alcohol companies is currently not quantifiable as a national sample. COMPPS has previously conducted research to quantify the level of sponsorship investment by alcohol companies at the national and state levels. COMPPS would welcome the opportunity to work with the Government to more accurately quantify the scale of alcohol-related cash and contra sponsorships of community sporting clubs in Australia. The reliance of alcohol related sponsorship varies from sport to sport at the community club level, however the majority of the COMPPS members report that alcohol related partnerships are generally categorised as being important to very important to the viability of local sporting clubs.
- **On average what are the maximum and minimum amount of sponsorship given to a single organisation?**  
Evidence-based data is not currently available to COMPPS to reliably quantify the average amounts of sponsorship money received from alcohol related companies (hotels/licensed clubs/alcohol producers & distributors)
- **What issues in your sector could affect organisations' interest in seeking Community Sponsorship Fund disbursements?**  
Fundamentally, the key shorter-term issues relate to whether the disbursements adequately replace the existing cash and contra sponsorships with alcohol-related organisations, as this may jeopardise viability in some instances. The medium-term considerations relate to the period following the cessation of the disbursements after four years if this funding is non-renewable. Alternative sources of community sponsorship funding are not easily sourced and this may be setting some local sporting organisations up for failure.
- **Do you have a view about an upper or lower limit of Community Sponsorship Fund money that should go to individual organisations?**  
No, we would suggest that individual organisations should make a voluntary determination on whether the arrangements for the Community Sponsorship Fund help their sporting club. There are an estimated 60,000 registered sporting clubs throughout Australia, and a large number of unregistered cultural organisations (those ineligible for Deductible Gift Recipient category) that would be eligible for the Fund. The proposed level of funding of \$25m over 4 years would appear substantially inadequate as a viable source of replacement income for the majority of these eligible bodies.
- **Should the Community Sponsorship Fund operate continuously throughout the year, or should there be discrete windows of opportunity to apply for funding? If so, how many?**  
.COMPPS does not have a definitive position on this question. The various sporting codes offer both seasonal and year round offerings with many of these community based organisations being non-active in the off season.
- **Should the Community Sponsorship Fund allocate a specific percentage of funds to sporting and/ or cultural organisations?**  
No, there would be no need to delineate between the two – they are community organisations and the issue is about a broader societal problem.
- **Should Community Sponsorship Fund disbursements be further targeted through allocated percentages to key demographics/ areas, for example: between indigenous and non-indigenous expenditure, or rural/ metropolitan?**  
Fund disbursements should be specifically targeted based on the best probability of reaching the population that are most at risk - younger Australians (12-25 year olds)
- **Any other issues?**  
Consideration should be given to [redirecting a significant proportion of the Community Sponsorship Fund to support suitable intervention and support programs to reach all high priority/higher risk communities over the next four years.](#) There are programs, such as the Australian Drug Foundation's Good Sports program, that are well

regarded by the various sporting codes, however the scalability of the program to reach high-risk communities is impeded by insufficient funding.

***ISSUE 2: Suggestions as to the conditions that funded organisations would need to accept to receive funds from the Community Sponsorship Fund.***

Questions on which the Department seeks input:

- **For the purposes of eligibility criteria for the Community Sponsorship Fund, should the definition of "alcohol industry" include community-based licensee sponsorships and "in-kind" sponsorship arrangements?**  
In-kind sponsorship arrangements (i.e. discounted meals, meeting/function rooms, discounted product) are often the most common and valuable components of the sponsorship arrangements at the community level.
- **Should Community Sponsorship Fund disbursements be restricted to organisations that are current or previous recipients of "alcohol industry" funding?**  
This would be problematic to define or evidence as many arrangements at the community level would be informal and not documented.
- **Should organisations that receive "alcohol industry" sponsorship be required to remove all alcohol branding imagery eg from uniforms, venues?**  
No, so long as this form of sponsorship remains legitimate then this should be at the discretion of the sponsorship recipient. Signage at many community venues may be beyond the control of the potential Fund recipient and should not be a condition of eligibility. There could be opportunities to provide funding to organisations and groups to display positive health messages.
- **For organisations that either hold or will obtain a liquor licence concurrently with funding from the Community Sponsorship Fund, what undertakings or requirements should the department seek to ensure alcohol is served in a responsible manner?**  
COMPPS supports the upholding of the liquor legislation as determined by the licensing authority in each respective state and territory. It is a reasonable expectation that servers of alcohol at venues which have obtained a liquor license to have completed an approved RSA course to equip them with the skills and knowledge necessary to contribute to a safe, enjoyable environment in licensed premises.
- **Any other issues?**  
COMPPS Members have alcohol management and preventative health programs in place. Funding should be made available for projects that measure the social impact of these programs and support should be provided for those that are working.

## ATTACHMENT A – BACKGROUND OF COMPPS

The aim of the Coalition of Major Professional and Participation Sports (COMPPS) is to provide Australian professional sporting organisations with an aligned industry voice and position to collaboratively respond to nationally significant issues impacting the delivery of sport in Australia

The sporting organisations represented in the COMPPS comprise:

- National Rugby League
- Australian Football League
- Cricket Australia
- Tennis Australia
- Netball Australia
- Australian Rugby Union
- Football Federation Australia

These organisations oversee the provision of organised and recreational sporting competitions to more than 80% of the estimated 4 million participants in organised sport nationally. The activities of COMPPS and other organised sporting bodies are supported through a community volunteer network of 1.5 million Australians contributing a total of 147.7 million hours per annum - representing 23% of total volunteer involvement throughout Australia.



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