



Submission from the Outdoor Media Association

1 Introduction

The Outdoor Media Association (OMA) welcomes the opportunity to comment on the National Preventative Health Strategy.

Out of Home (OOH) media plays an important role in society. In addition to providing a communication channel for businesses and organisations in Australia, it provides significant revenue to state and territory governments, and key infrastructure, making our cities more liveable and vibrant. With an audience reach of 13.2 million Australians each day, the industry also provides opportunities to promote important government and not-for-profit campaigns.

As will be noted in this submission, OOH media can be a useful tool in encouraging social change, with previous campaigns shown to be successful in message retention and behaviour change.

Government can have great positive impact on health outcomes by focussing on proven methods for social change, such as positive messaging to encourage and reinforce healthy behaviour.

The OOH industry has also invested significant resources in doing its part to meet government and community expectations with robust self-regulatory restrictions as to the content and placement of advertising, backed with regular training and pre-vetting services. This has seen the industry ban smoking advertising (including moving ahead of regulations to ban the advertisement of e-cigarette products), and limiting the advertising of alcohol and discretionary food and drink products.

The OMA believes this approach has been beneficial to the overall aims of the government in reducing the health risks associated with these products and has provided leadership within the advertising industry as a whole.

1.1 About the OMA

The OMA is the peak industry body that represents 80 per cent of Australia's traditional and digital Out of Home (OOH) media display companies and production facilities. A key role of the OMA is to help develop policy and regulation for Outdoor advertising that is fair and equitable to governments, the community and industry. The industry's aim is to deliver high quality and well-designed signage that benefits communities.

1.2 About the OOH advertising industry

One of the oldest traditional communication platforms, OOH advertising incorporates a variety of formats and environments, from billboards to bus shelters, and shopping centres to office foyers. As technology evolves, OOH can now deliver scale, impact and reach, with immediacy and flexibility. The OOH industry plays an important role in the economy and liveability of our cities. Over 50 per cent of OOH revenue is returned to governments and landlords around Australia. Most OMA members are Australian owned and operated, with profits going back to the Australian economy.

In 2014, research by Deloitte Access Economics found that the direct economic contribution of the OOH industry was \$273.5 million. Advertising creates employment and the industry supports over 4,500 FTE jobs across Australia.

In addition to the monetary contribution, the industry delivers essential services and savings with OOH media publishers building and maintaining \$352 million of public infrastructure such as bus shelters, payphones and public Wi-Fi access points. The 17,664 pieces of public infrastructure delivered by OOH make our cities more liveable and more user-friendly. The industry continues to invest in innovation and digital utility to ensure that this positive impact only increases with time.

2 The Strategy

2.1 OOH is a Channel for Social Change

The OMA and the OOH advertising industry are committed to responsible advertising and have a history as a preferred channel for encouraging social change. The industry is ideally placed to be a key partner in helping to spread the message about healthy lifestyles, including healthy food choices, and other preventative health measures.

The OMA and its members have invested significant time and resources into a number of key campaigns which have demonstrated the ability of OOH to encourage social change.

2.1.1 Add an extra handful of veggies



The Add an extra handful of veggies campaign

This year, the OMA and its members launched the 'Add an extra handful of veggies' campaign across Australia, in partnership with the Australian Government Department of Health. This campaign encouraged people to improve their vegetable intake by adding an extra handful of vegetables to their meals. Delivered as part of a commitment by the industry to invest in healthier lifestyle messaging, the campaign saw the industry donate \$3.2 million (then-current market rates) in free advertising space and creative services to bring the 'Add an extra handful' message to life.

The campaign was effective at encouraging positive behaviour change, as demonstrated by the results of a post-campaign survey. 82 per cent of respondents said that they remembered seeing the campaign and 74 per cent said that, after seeing the advertisement, they made a conscious decision to add veggies into their meals and snacks.

Importantly, 64 per cent of respondents were parents to children aged 15 or below. Of those, 86 per cent said they were encouraged to include more veggies in their meals and 80 per cent were encouraged to make healthier choices for their children's meals.

OMA members are committed to running a healthy lifestyle campaign every year, working with different government departments and healthy living groups.

2.1.2 Children can inherit more than your looks



The children can inherit more than your looks campaign

In 2018, the OMA partnered with DrinkWise to produce the DrinkWise 'Children can inherit more than your looks' campaign. One in five parents don't think their current drinking behaviour will influence how their children drink in the future. The DrinkWise campaign is the OOH industry's effort to tackle this issue, signing a three-year MOU to provide inventory displaying the DrinkWise campaign as well as contributing five per cent of OOH alcohol revenue to alcohol education campaigns. So far, the OOH advertising industry has donated advertising valued at over \$7.7 million to the DrinkWise partnership.

The first two-week campaign went live in September 2018, raising awareness about how parents and peers can model responsible drinking around kids. The campaign was repeated in June 2019. Following the most recent campaign, one in five people remembered seeing the DrinkWise campaign, 63 per cent planned to reduce alcohol consumption in front of their children and one in three had a

conversation with friends and family about the campaign and its message.

These results show that OOH advertising is memorable, can change behaviour and start a conversation. The post campaign survey showed that the public is receptive to OOH messaging, particularly in relation to key social issues, with 95 per cent of people stating they wanted to see more campaigns like DrinkWise and 61 per cent believing ads such as DrinkWise are good for society.

These campaigns not only demonstrate the willingness of the industry to work with the government on key social change but the effectiveness the partnership can bring. The OOH industry would welcome the opportunity to discuss options for partnering with various stakeholders to produce and support important healthy lifestyle campaigns.

2.2 Restriction of Advertising Content

Because it takes its role as a very public medium seriously, the OOH industry has been a leader in the self-regulation of content to ensure what is displayed meets

government and community expectations. The OMA, in consultation with industry, has implemented a number of advertising industry-first policies which make OOH the leaders in self-regulatory policy of this nature.

2.3 Restricting the placement of alcohol and discretionary food and drink

In 2007 the OMA created its Placement Policy which restricts the placement of OOH advertisements around Australian primary and secondary schools. Under this policy, advertisements for restricted products and services will not be placed within a 150 metre sightline of the boundary of a primary or secondary school. The policy applies to alcohol, gaming and wagering, adult and sexual products and services, and, as of 2020, certain discretionary foods and drinks.

Under this 2020 expanded Placement Policy, only food and drinks which are non-discretionary (that is, one of the five food groups under the Australian Guide to Healthy Eating) can be placed near a school, unless they have a Health Star Rating of 3.5 or more. This means that advertisements for obviously discretionary foods, such as burgers, confectionary and full sugar soft drinks, will never be located around a school and advertisements for products which may be discretionary will require a Health Star Rating of 3.5 or more to be displayed.

To make this policy workable, the OMA invested significant time and money into a school mapping project which uses government backed-PSMA data to geolocate OMA members' signs where content restrictions must be in place according to OMA policies. Of the 31,347 roadside signs across Australia, approximately 20 per cent, or 6,289 sites, are within a school buffer zone.

2.4 Restricting messaging that is contrary to government health advice

OMA members are also bound by the OMA Code of Ethics and the OMA Advertising Content Policy which restricts the advertising of tobacco and smoking products, including e-cigarette products, and content which depicts smoking across all inventory. This goes further than government restrictions as even tobacco retailers are restricted from advertising on OOH if their name alludes to smoking or smoking products.

This Policy also restricts the advertising of messages that targets or promotes messaging contrary to a state or federal public health campaign.

The OMA proactively took action to introduce this clause in response to government and community concern regarding anti-vaccination messaging, closing a loophole to ensure that messaging will never appear on OOH signs.

2.5 Other self-regulatory schemes

In addition to these policies, compliance with which is a condition of membership, OMA members are also bound by the Australian Beverages Advertising Code (ABAC) in relation to the content of alcohol advertising. Further, the ABAC also references the OMA's own Placement Policy meaning that all alcohol advertising is restricted around schools.

It should also be noted that the advertising industry as a whole has long demonstrated a commitment to responsible practice, within an otherwise relatively unregulated market, through self-governed advertising codes. OMA members are especially good at managing compliance with self-regulatory codes and, in fact, billboards only represented 4.26 per cent of complaints to the Ad Standards Board in 2018. In 2020 only three OOH advertisements were found to have breached the Code and the advertisements were quickly removed from inventory.

The OMA is open to opportunities to work with government on ways the self-regulatory scheme could be used to support the Strategy without unduly impacting the OOH industry's ability to operate.

3 Conclusion

The OMA is supportive of the overall objectives of the National Preventative Health Strategy.

The OOH industry has worked hard over the years to build a robust self-regulatory scheme and to demonstrate how seriously the industry takes the role it plays as a very public medium. The industry is now a leader in responsible content management through this self-regulatory scheme.

The OMA believes there are myriad ways the industry can contribute to improving healthy lifestyles in Australia. We welcome the opportunity to work with the Government on ways OOH advertising can support the outcomes of the Strategy.

If you would like further information or to set up a meeting please contact Kirsten Samuels, Senior Policy Officer on 02 9357 9900 or email kirsten.samuels@oma.org.au.

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¹ "Review of Operations 2018." *Ad Standards* p. 21 https://adstandards.com.au/sites/default/files/ad_standards_review_of_operations_2018_final.pdf