



SBS Submission

Therapeutic Goods Administration

Consultation: Therapeutic Goods Advertising Code

October 2017

Introduction

The Special Broadcasting Service (**SBS**) welcomes the opportunity to submit to the *Consultation: Therapeutic Goods Advertising Code* and on the proposed improvements to the *Therapeutic Goods Advertising Code* (the **Code**), including a proposed framework for Schedule 3 (pharmacist only) medicines advertising.

SBS is unique in the Australian media environment. Its function is to provide multilingual and multicultural radio, television and digital media services that inform, educate and entertain all Australians and, in doing so, reflect Australia's multicultural society. SBS's functions are guided by its Charter and the *Special Broadcasting Service Act 1991* (**SBS Act**).

Under the SBS Act, SBS television, radio and digital media services can broadcast and publish advertisements and sponsorship announcements. Advertising provides a valuable source of operating revenue for SBS, around one quarter of revenue coming from commercial activity, and three quarters from government appropriation. These funds allow continued investment in the creation of Australian content.

Proposed Code Changes

As proposed, SBS supports increasing broadcasters' ability to advertise a broader range of Schedule 3 substances (noting that some of these products will not be appropriate for direct advertising to consumers). Additional advertising of these products will deliver health benefits by increasing the provision of consumer information about products to treat common conditions.

SBS also supports a stronger, more objective and clearly expressed Code and the development of guidelines to the new Code, which would be made available to stakeholders.

SBS Radio is the world's most linguistically diverse broadcaster, bringing around 70 language programs and dedicated digital music channels to the close to five million Australians who speak a language other than English at home. SBS Radio receives and broadcasts in-language advertisements across these services.

In order to best serve its stakeholders SBS submits that consideration should be given to providing the Code and accompanying guidelines in languages other than English and proposes making the documents available in English, Mandarin, Arabic, Cantonese, Vietnamese, Italian, Greek, Hindi, Spanish and Punjabi to reflect the 10 most spoken languages in Australia as detailed in the Australia's 2016 Census, released by the Australian Bureau of Statistics in 2017.

SBS In Language provides specialist strategic consulting, translation services, subtitles, voice over, typesetting and video production to reach clients in their own language. Services include production of print, audio and video content in over 70 languages and our team of specialist producers work with over 250 language contractors to deliver projects to government, corporate and agency clients, as well as internal SBS departments. SBS would be pleased to discuss further with the Therapeutic Goods Association if it wishes to make use of these services.

An option for an Advertising Framework for Schedule 3 (pharmacist only) medicines

SBS submits that the proposed additional requirements for the advertising of these medicines are appropriate. The proposal to standardise the messaging will benefit all stakeholders and simplify SBS's approval processes. However, as noted above, SBS strongly recommends that clear information and guidance to stakeholders be made publicly available, and in languages other than English, to minimise the additional burden that the removal of the pre-approval service will impose on broadcasters and publishers.

Conclusion

SBS submits that the proposed additional requirements for the advertising of these medicines are appropriate.

SBS also recommends that clear information and guidance to all stakeholders be made publicly available in languages other than English.