



8 September 2022

Ms Gina Cass-Gottlieb  
Chair  
Australian Competition and Consumer Commission  
By email: [digitalmonitoring@acc.gov.au](mailto:digitalmonitoring@acc.gov.au)

Dear Ms Cass-Gottlieb,

Thank you for the opportunity to provide a submission in response to the [sixth Issues Paper](#) for the [Digital Platform Services Inquiry](#) (DPSI).

Cancer Council's key area of concern in digital advertising is in ensuring that children and young people can participate in the digital environment without exposure to harmful marketing for unhealthy food and alcohol. Children should be able to learn, communicate and participate online without their data or personal information being collected, used and disclosed, in particular to design and deliver marketing for harmful products. We know that digital media is an important part of children's daily lives, with Australian children going online as part of their education, to communicate with their friends and family, and to have fun. There is clear and robust evidence that children's exposure to unhealthy food marketing influences their food choices, influences their diets, and can contribute to poor diets, overweight and obesity.<sup>i</sup>

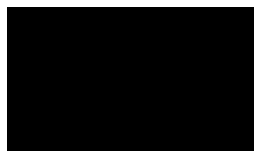
Instead of an environment that promotes their health and wellbeing, when children go online, they are often bombarded with sophisticated digital marketing campaigns for unhealthy food. These campaigns are implemented via technologies and delivery systems designed and supported by powerful online platforms and social media companies, to harness children's data and personal information to enable marketing to be highly targeted, engaging and effective. Cancer Council strongly supports broad government regulation to ensure children and young people are fully protected from digital marketing of unhealthy food and alcohol, including on social media. The Australian Government has an important role to play in protecting children and young people online and creating an environment that restricts commercial exploitation of children, enabling them to participate as digital citizens, while having their best interests protected.

Cancer Council supports the recommendations made by the **Obesity Policy Coalition**, that the Australian government introduce comprehensive, mandatory regulations to protect children and young people from unhealthy food and alcohol marketing. This should ensure children are not exposed to unhealthy food and alcohol marketing when online or using social media.

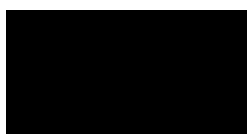
We also support the recommendation from the Obesity Policy Coalition that the ACCC consider and report on the harms to children and young people caused by the collection, use and disclosure of their data by social media services, including specific consideration of the harms caused in relation to exposure to harmful marketing such as for unhealthy food and drinks, as well as alcohol. We additionally support the recommendation that the ACCC consider harms caused by the collection, use and/or disclosure of adult individuals' personal information or data for the purposes of commercial marketing without express consent, particularly as they relate to unhealthy food and drink as well as alcohol.

We thank you for your consideration of these important issues.

Yours sincerely,



Professor Tanya Buchanan  
CEO, Cancer Council Australia



Clare Hughes  
Chair, Nutrition and Physical Activity Committee

Cancer Council is Australia's leading cancer charity, working across every aspect of every cancer. Every day, we support people affected by cancer when they need it most; speak out on behalf of the community on cancer issues and advise the Australian Government and other bodies on evidence-based practices and policies; empower people to reduce their cancer risk; and find new ways to better prevent, detect and treat cancer.

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<sup>i</sup> Food marketing exposure and power and their associations with food-related attitudes, beliefs and behaviours: a narrative review. Geneva: World Health Organization; 2022. Licence: CC BY-NC-SA 3.0 IGO.