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Submission to Online Safety Act 2021

Alcohol & Other Drug (AOD) messaging proliferation and harm layering factors.

Dalgarno Institute

Introduction

Research demonstrates that young Australians face multiple interconnected risks on social media platforms, including exposure to substance-related content... and other addictive behaviours. Young people are particularly vulnerable as they are "early adopters, nearly ubiquitous users, and highly susceptible to peer influences" (Romer & Moreno, 2017).

Drawing on research from the National Centre for Youth Substance Use Research, The University of Queensland and other resources, the following submission is focusing specifically on alcohol and other drugs (AOD) and the incredibly pervasive nature of substance promotion in the online arena.

A Prevention Primer

It is important to note from the outset that according to Australian Institute of Health and Welfare Most people still do not approve of regular drug use, however,

> …approval did increase for several drugs In 2022–2023, most people did not approve of the regular use of any drug. As in 2019, people were most likely to approve of an adult regularly using alcohol (46%), and more people approved of the regular use of cannabis (23%) than tobacco (15.5%).
>
> Also similar to 2019, disapproval was highest for the regular use of heroin (95% of people disapproved), sniffing petrol/glue/aerosols/solvents (95%) and methamphetamine and amphetamine (93%) in 2022–2023.
>
> Between 2019 and 2022–2023 the approval for all drugs remained low, and was either stable or increased marginally. In general, approval of the regular use for a number of drugs has been gradually increasing, and was at the highest seen since the beginning of time-series reporting in 2007:
>
> Cannabis increased from 6.6% in 2007 to 23% in 2022–2023.
>
> *Perceptions of alcohol, tobacco and drugs in Australia*
> *https://www.aihw.gov.au/reports/alcohol/perceptions-alcohol-drugs*

The consumption equation remains (arguably) an irrefutable 'law'; **'Accessibility, Availability and Acceptability = Increased Consumption'.** This, of course is the goal of all addiction for profit industries including the long-standing culprits of Big Tobacco and Big Alcohol, and now very much being added to by Big Cannabis, taking all its plays form Big Tobacco. The long-standing business foundational principle still drives marketing… "If you want to still be in business in 25 years, you must market to children."
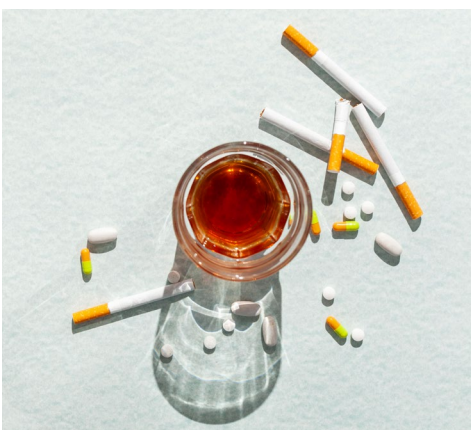
All *Permission Models* not only drive community sentiment – people being led to believe that a 'thing' may not be that bad if we keep decreasing warnings and increasing potential access. However, it is also the prevention models and messages that are being excised from the public square when it comes to alcohol misuse and substance use, doubling the undermining of protective factors for the vulnerable populations, especially the young.

More concerningly, is that the key primary protective asset, particularly for young people, has been either neglected, ignored, or being deliberately sabotaged, *ironically via stigma*.

> **INGNORED RESEARCH:** Research from **University of Illinois College of Agricultural, Consumer and Environmental Sciences** in 2022 was surprising, but profound...
>
> The research which included more than 128,000 grade 8,10 and 12 youth from Illinois state schools... **found individual beliefs that drug use is wrong had twice the magnitude of impact compared to other risk and protective factors examined in the study.**
>
> *"Thus, influencing adolescents' beliefs about drug use may be an important but relatively underemphasized key to modifying their behaviour."*
>
> "It is not surprising that drug use beliefs are linked to behaviour; we certainly would expect a correlation between them. What's most noticeable is the magnitude of the effect, particularly in comparison to more established factors included in the analyses."
>
> In the survey, youth were asked how wrong they think it is for someone their age to consume alcohol or other drugs, ranking from "not wrong at all" to "very wrong" on a four-point scale. For each unit increase in response, the likelihood of past-year drug abstinence increased by 39% for 8th graders, 50% for 10th graders, and 53% for 12th graders.
>
> Beliefs not only correlated strongly with past usage, but also with frequency of use. **"Even among individuals who used drugs in the past year, individual beliefs that drug use is wrong were associated with less frequent use,"** https://medicalxpress.com/news/2022-03-drug-beliefs-strongest-predictor-youth.html

Research demonstrates that young Australians face multiple interconnected risks on social media platforms, including exposure to substance-related content... and other addictive behaviours. Young people are particularly vulnerable as they are "early adopters, nearly ubiquitous users, and highly susceptible to peer influences" (Romer & Moreno, 2017).

However, beyond these social contagion realities, there is also the very concerning bio-behavioural harms that these addictive products add to the *pursuit and consumption* model. Substance use being the fastest way to derail and disrupt the brain development of those under the age of 28, but alarmingly so for those under the age of 21. This maladaptive brain development only drives greater pursuit and consumption of these addictive substances, in turn fostering even more social media *click bait* and traffic.

Evidence Base for Reform

1.1/ Substance-Related Content

Our comprehensive analysis revealed widespread exposure to harmful content:

- Analysis of over 15 million substance-related social media posts found that 76.3% portrayed substance use positively (Rutherford et al., 2023)

- TikTok analysis showed 54% of cannabis-related videos promoted positive associations, with no age restrictions (Rutherford, Sun, Johnson, et al., 2022)

- E-cigarette content on TikTok:
  ◊ 63% depicted vaping positively
  ◊ Accumulated over 1.1 billion views
  ◊ 70.1% remained accessible after 9 months
  ◊ 63.7% still accessible after 12 months (Rutherford, Sun, Lim, et al., 2022)

- Young people (17-25 years) are exposed to alcohol advertising every 3 minutes on Facebook/Instagram (Rutherford, Leung, Stjepanović, & Chan, 2024)

2.1/ Substance Use and Social Media

- Displays of alcohol use on social media are indicative of personal use among young people and enhance normative perceptions among followers (Moreno et al., 2012)

- Marketing of alcohol products on social media creates opportunities for brands to connect with young people and develop brand loyalty despite age restrictions (Jernigan & Rushman, 2014)

- 59% of pro-marijuana tweets were sent by users under age 20, many with large follower networks (Cavazos-Rehg et al., 2015)

3.1/ Celebrity and Influencer Promotion

Research demonstrates concerning patterns in how substance use is normalised through influential figures:

- Popular influencers and celebrities regularly glamorise substance use in lavish settings, creating positive associations with drug and alcohol use

- Content is presented in aspirational contexts, linking substance use with success and luxury

- Marketing strategies deliberately leverage celebrity influence to promote substance-related products

- Young people are particularly vulnerable to these presentations due to:
  ◊ Celebrity worship patterns
  ◊ Desire for social status
  ◊ Peer influence mechanisms (Rutherford et al., 2023)

3.2/ Peer Influence Amplification

Studies show concerning correlations between social media exposure and substance use:

- Teenagers with regular social media use were:
  ◊ Five times more likely to purchase cigarettes
  ◊ Three times more likely to consume alcohol
  ◊ Twice as likely to use marijuana

- Strong links identified between social media use and:
  ◊ Problematic drinking behaviours
  ◊ Emotional difficulties
  ◊ Increased substance use risk (Cheng et al., 2024)

**Drug Use:
Health or Criminal Issue?**

"Let's be crystal clear – 'Recreational' Illicit substance use is **not a health issue**; it is a **criminal one**. Let's not conflate law and health 'breaking' substance use for 'fun' (that can lead to anti-social behavior and addiction), with trauma informed self-medicating drug engagement.
These are completely different contexts and require different interventions for prevention and recovery." (Dalgarno Institute)
#preventdontpromote drug use.

3.3/ Social Media's Inherent Addiction Development Risk

Research reveals that social media platforms create their own addiction risks:

- Platform design deliberately triggers dopamine responses similar to addictive substances

- "Likes" and engagement metrics create reward patterns in the brain comparable to substance-induced pleasure

- The combination of social media addiction and substance promotion creates compounded risks for young users

- Platforms exploit psychological vulnerabilities through:
  ◊ Variable reward schedules
  ◊ Social validation loops
  ◊ Fear of missing out (FOMO)
  ◊ Continuous scroll mechanisms (Rutherford et al., 2023)

Recommended Reforms

1. Comprehensive Age Verification

Current Evidence of Failure:

- No effective age restrictions on cannabis content (Rutherford, Sun, Johnson, et al., 2022)

- E-cigarette content accessible without verification (Sun et al., 2021)

- Gambling content available to underage users (King et al., 2014)

- Young people (17-25 years) are exposed to alcohol advertising every 3 minutes on Facebook/Instagram (Rutherford, Leung, Stjepanović, & Chan, 2024)

Recommended Measures:

A. Mandatory government ID verification for account creation

B. Regular age verification checks

C. Age-appropriate content filters

D. Financial penalties for verification failures

2. Content Moderation and Platform Accountability

Evidence of Current Issues:

- 70.1% of harmful videos remain accessible after 9 months (Rutherford, Sun, Lim, et al., 2022)

- Interconnected promotion of gambling and substance use content

- Platform algorithms amplify rather than restrict harmful content

Recommended Measures:

A. Mandatory AI-powered content detection

B. Required takedown timeframes

C. Algorithm transparency requirements

D. Regular content audits

E. Cross-platform coordination requirements
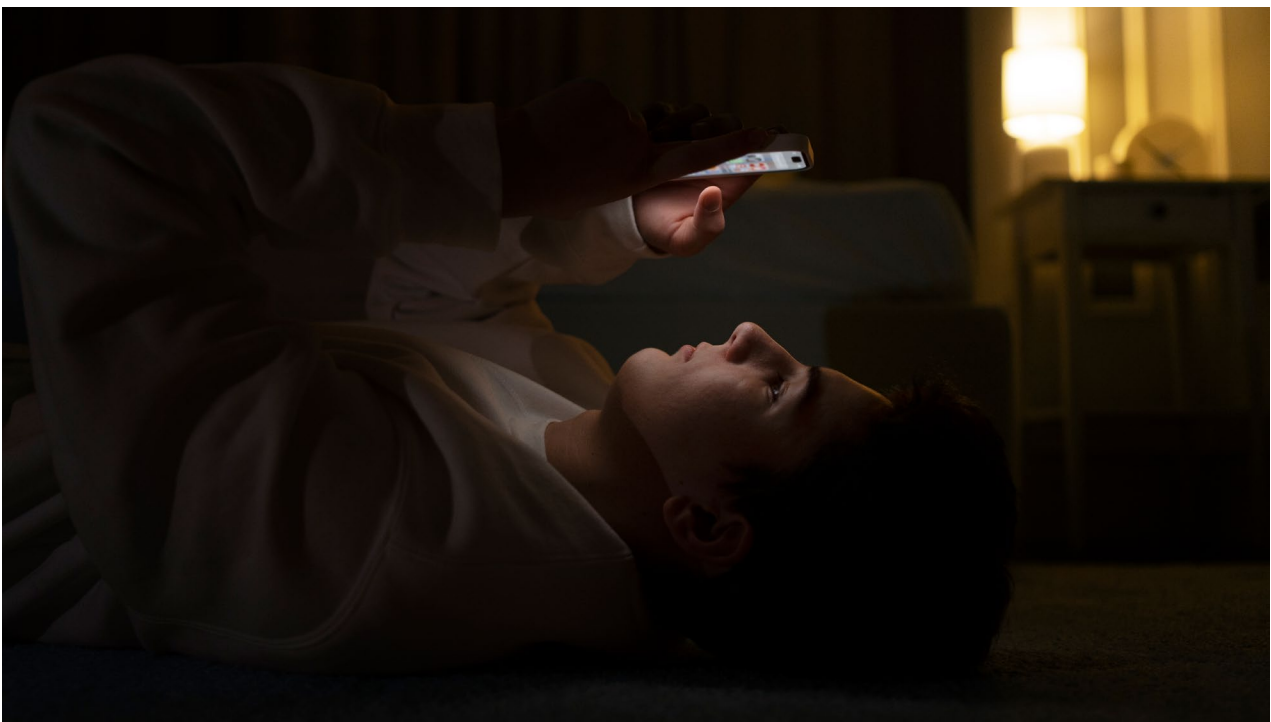
3. Intervention Systems

- Proactive Protective Messaging Saturation

- Systematically connected and automatic messaging of a prevention and protective nature attached to all AOD related memes, micros and messages

- Proactive use of negative portrayals of substance use and inherently 'bad' for the teenage demographic

- The 'interruptive' promotion of online counselling showed effectiveness for both substance use and gambling issues (Monaghan & Wood, 2010)

Recommended Measures:

A. Mandatory warning systems

B. Required intervention points

C. Access to support services

D. Usage tracking and alerts

E. Mandatory cool-down periods

4. Influencer and Celebrity Content Regulation

Evidence of Current Issues:

- Celebrity and influencer content normalising substance use reaches millions of young viewers

- No current requirements for disclosure of lifestyle impact

- Marketing strategies deliberately exploit influencer reach

- Young users particularly vulnerable to aspirational content

Recommended Measures:

A. Mandatory disclosure of paid promotion

B. Restrictions on substance-related content from high-influence accounts

C. Age-gating for accounts promoting adult-oriented lifestyles

D. Requirements for health warnings on lifestyle content featuring substances

5. Platform Addiction Mitigation

Evidence of Current Issues:

- Platform design exploits psychological vulnerabilities

- No limits on addictive features targeting young users

- Engagement metrics drive harmful behaviour patterns

- Lack of transparency in design features impacting youth

Recommended Measures:

A. Mandatory usage limits and breaks

B. Removal of infinite scroll features

C. Restrictions on engagement metrics for young users

D. Required digital wellness tools

E. Transparent reporting of addictive design features

Implementation Framework

Regulatory Oversight

Evidence shows current self-regulation is ineffective:

- 76.3% of substance-related content remains positive despite platform policies

- No effective age restrictions implemented voluntarily

- Continued presence of illegal substance promotion

Recommended Framework:

1. Independent oversight body with monitoring authority

2. Regular compliance audits

3. Mandatory reporting requirements

4. Clear penalty structure for violations

5. International regulatory cooperation mechanisms

Enforcement Measures

Based on documented platform behaviour, we recommend:

1. Financial penalties scaled to platform revenue

2. Mandatory compliance reporting

3. User reporting mechanisms

4. Regular effectiveness reviews

5. Public transparency requirements

Conclusion

The evidence demonstrates that social media platforms create multiple, interconnected risks for young users through exposure to substance-related content and other addictive behaviours. Reform must address these issues comprehensively rather than in isolation with a focus on all best-practice evidence based protective factors, not simply the convenient ones.

Further Reading:

• Permission – The Most Effective Drug Pusher

• AOD Primary Prevention & Demand Reduction Priority Primer: TASKING THE NATIONAL HEALTH STRATEGIES FOR COMMUNITY WELL-BEING

• Drug Use, Stigma & Proactive Contagions to Reduce Both

• Social Determinants & Substance Use – Beyond the Policy 'Silo' Pragmatics

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