




May 27, 2009

The Secretary  
Select Committee on Campaign Advertising  
Committee Office  
Legislative Assembly for the ACT  
London Circuit  
ACT 2600

		A.C.T. LEGISLATIVE ASSEMBLY COMMITTEE OFFICE	
SUBMISSION NUMBER		12	
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Dear Sir,

As the peak body representing advertising agencies in Australia, the Advertising Federation of Australia submit the following comments on the Government Agencies (Campaign Advertising) Bill 2008.

**Section 8:** The definitions (a) and (b) applied to government advertising are not, in our opinion, adequate and may be misleading. This section implies campaign advertising refers to the dissemination of information, when one of the key roles for some types of government advertising can be to persuade or change attitudes/behaviour.

**Section 10:** The AFA feel the \$20,000 threshold is too low – we understand this would mean virtually every government communications activity will be required to go before the Auditor-general.

**Section 13(3)(c):** The requirement - government advertising 'must not include slogans or other advertising techniques' like 'jingles' is clearly a mistake. Slogans, jingles and 'techniques' (whatever is meant by this word) are at the heart of most advertising campaigns. We are not certain of the intention behind this section, and in our experience with advertisers and contracts we have never sighted such a provision.

**Section 14(g):** The example cited about the need to identify a government campaign at both the beginning and end of a TVC or radio spot is not the accepted way in which other state and federal government is presented. The AFA feel that clear visual with voice-over is sufficient identification.

We note that the Bill frames government campaigns in solely in terms of explanation of information and policies, whilst there are – in our experience - many government campaigns that have very different objectives.

We would be happy to discuss any of the above with the Committee should you wish

Yours sincerely,

  
Gawen Rudder  
Manager, Business Services & Advice