



25 February 2021

Mr Rod Sims  
Chair, Australian Competition and Consumer Commission  
By email: [adtechinquiry@acc.gov.au](mailto:adtechinquiry@acc.gov.au)

Dear Mr Sims,

Thank you for the opportunity to provide a submission in response to the **Interim Report of your Inquiry on Ad Tech – digital advertising services** (Inquiry).

Cancer Council's key area of concern in digital advertising is in ensuring that children 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.

Cancer Council strongly urges the ACCC to ensure that the Inquiry's final report specifically considers the interests of children and assesses how children will be impacted by proposed reforms. The ACCC's final recommendations should put children's privacy, health and wellbeing above the profits and interests of the digital advertising, unhealthy food and alcohol industries.

Cancer Council supports the recommendations made by the **Obesity Policy Coalition**, as follows:

1. The final report should expressly assess how each proposal will affect children. We note that the Interim Report did not include sufficient assessment on how the current ad tech system, or any of the proposals for reform, affect or will be likely to affect, children.
2. We ask the ACCC to recommend that children's data must be protected, specifically that no children's data can be collected, used or disclosed for the purposes of any form of marketing.
3. We ask the ACCC to recommend that children be expressly excluded from the operation of all proposed reforms that enable expanded access to or portability of data.

We thank you for your consideration of these important issues.

Yours sincerely,



Tanya Buchanan  
CEO

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.