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14 November 2014

Competition Policy Review Secretariat
The Treasury
Langton Crescent
PARKES ACT 2600

Submission from the McCusker Centre for Action on Alcohol and Youth – Draft Report

Thank you for the opportunity for the McCusker Centre to provide a submission to the *Competition Policy Review Draft Report* (Draft Report).

We are concerned that the recommendations in the Draft Report have the potential to substantially increase the availability of alcohol and contribute to even greater levels of alcohol-related harm in Australia.

The following draft recommendations would have concerning implications for the sale and supply of alcohol:

- Draft recommendation 51: Removing retail trading hour restrictions, including in regard to alcohol retailers;
- Draft recommendation 11: Reducing constraints on supermarkets and convenience stores being able to sell alcohol;
- Draft recommendation 10: Removing restrictions related to planning and zoning for alcohol outlets.

Research has consistently found that increasing the availability of alcohol in a region – for example, through increased trading hours or days, or a higher density of alcohol outlets – is likely to increase alcohol-related problems.¹ We are very concerned that promoting competition through these recommendations and ignoring the strong evidence linking the availability of alcohol and alcohol-related problems will lead to greater levels of harm from alcohol in the community.

¹ Commonwealth of Australia. Australia: The Healthiest Country by 2020 – National Preventative Health Strategy – the roadmap for action. Canberra: Commonwealth of Australia; 2009.



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The McCusker Centre does not support further deregulation of retail trading hours for alcohol; supermarkets or convenience stores selling alcohol; or any other changes to competition policy that have the potential to increase the overall physical or economic availability of alcohol.


Alcohol should not be treated as an ordinary commodity due to its potential to cause a wide range of health and social harms. The Draft Report appears to treat alcohol in the same way as all other areas of retail; this approach does not reflect the significant health and social harms alcohol causes to the drinker and to others.

In the interests of public health, it is essential to preserve the ability of governments to impose appropriate controls on the economic and physical availability of alcohol, even where these controls may otherwise be seen to limit competition.

The McCusker Centre supports the submission of the Public Health Association of Australia (PHAA) in response to the Draft Report and shares the view that competition policy should not undermine public health or be an obstacle to the appropriate and effective regulation of alcohol. We endorse the recommendations outlined in the PHAA's submission.

Thank you for the opportunity to make this submission.

Yours sincerely,

Professor Mike Daube AO 
DIRECTOR, MCCUSKER CENTRE FOR ACTION ON ALCOHOL AND YOUTH