

Additional Comments by the Australian Greens

Senator Rachel Siewert

The Australian Greens remain concerned by the extent to which the introduction of an increase in the excise on ready to drink beverages is a partial and ad-hoc measure, rather than one facet of a comprehensive national strategy to address the problems caused by risky drinking and our culture of drunken-ness – particularly among the young.

We note that this measure goes some of the way to addressing the problem of underage drinking and risky drinking among younger Australians by closing the loophole which had effectively made pre-mixed spirit-based drinks cheaper to consumers than the cost of buying and combining the constituent elements. While there is some justification for targeting a price signal on drinks which are designed to appeal to younger drinkers – by making the taste of alcohol and by packaging and colouring that mimics the appearance of soft-drinks popular with teenage consumers – we believe that a more comprehensive and joined-up approach is required to address the underlying social causes of risky drinking and to avoid those at risk simply switching over from 'alcopops' to other cheaper products.

The Australian Greens advocate a sustained, comprehensive, long-term strategy to reduce alcohol-related harm, decrease the incidence of underage drinking and alcohol-related violence, improve referral, treatment and support for problem drinkers, and promote a culture of safe and responsible alcohol consumption.

We believe that a total ban on alcohol advertising, sponsorship and promotional activities should be implemented. This should then be supported by volumetric tax on alcohol that sends a clear price signal to young and problem drinkers, and supports greater resources for alcohol treatment and rehabilitation through hypothecation.

We believe that large, well designed health warning labels with strong and well-targeted messages can play a key role in reminding drinkers at the point of consumption of strong health and safety messages that have been promoted through well-resourced community education and social marketing campaigns.

The Australian Greens believe that reducing the availability of alcohol through restricting the number of alcohol outlets and trading hours should be backed up by place-based strategies to reduce alcohol-related harm and violence and improve the safety and public amenity of late night entertainment precincts and other problem areas.

We believe that we need a more joined-up and better resourced approach to referral, treatment and rehabilitation services for problem drinkers that maximises the benefits of early intervention, and ensures that those seeking help can access appropriate support in a timely and effective fashion.

Alcohol-related harm

The Australian Greens remain concerned by the consistently high levels of alcohol-related harm experienced in Australia over the last two decades. While this is not the sudden crisis some would have us believe, it has been an issue of great concern that imposes significant costs (in 2005 the estimated cost was \$15.2 billion, while the estimated revenue was \$5 billion).

We note the evidence to the committee that the real rapid growth in risky drinking occurred predominantly during the 1980's, and that rates of alcohol consumption have remained at high but relatively static levels since then. We also note that the increase in the consumption of ready to drink beverages has predominantly reflected a switch in drinking preferences rather than an increase in overall consumption patterns or levels of risky drinking.

The issue of alcohol-related violence is a major cost to the community – not only in relation to the high levels of injury and hospitalisation caused by alcohol-related assaults, but also through the loss of public amenity as drunken misbehaviour in late night entertainment precincts effectively turn them into no-go zones for other users. The proliferation of reports of nightclub assaults and 'one-punch deaths' has contributed to a climate of fear.

The Australian Greens advocate a strategic approach to tackling alcohol-related violence which includes placing some restrictions on the number of alcohol outlets and their trading hours in problem areas backed up by a place-based strategy to increasing public safety in these entertainment precincts. Such a approach requires an integrated strategy involving local, state and federal governments that breaks up 'black spots' and increases policing and security to clearly demonstrate that violent behaviour will not be tolerated.

A clear price signal

In particular, we remain concerned that the effectiveness of the increase in the excise on ready to drink beverages will be diminished if this price signal is not supported by a joined-up approach – which addresses the marketing of alcoholic products and culture to young Australians and also ensures that problem drinking behaviour isn't simply transferred across to other cheap sources of alcohol. The latter requires a consistent price signal across different alcoholic products and classes, as there is a strong consensus in the international research into problem drinking that young

drinkers and problem drinkers are the most sensitive groups to the cost of alcohol – that is, that these groups are more likely to reduce their consumption in relation to increases in price, while the drinking behaviour of moderate adult drinkers is less likely to be affected by an increase in price.

Advertising, sponsorship and promotional activities

As we indicated in our minority report on the Alcohol Toll Reduction Bill inquiry, the Australian Greens remain concerned that the activities of the Monitoring of Alcohol Advertising Committee as directed by the Ministerial Council on Drug Strategy are merely to monitor alcohol advertising and the current regulatory system. This is clearly insufficient as there was substantial evidence presented to the committee that the current system of industry self regulation is not working, despite several reviews and promises of reform. The evidence from the research undertaken by Professor Sandra Jones is particularly compelling on this point.

We believe that there is already sufficient evidence on which to act, and the high levels of alcohol-related harm mean that we should act quickly and comprehensively. We also note in passing the failure of the previous government to act on this pressing issue during its eleven years in office.

In light of a decade of evidence that attempts to reform the process of self-regulation have made little difference to the preponderance of inappropriate advertising of alcohol, we believe that as a minimum course of action the Government should move to enforceable regulation of alcohol advertising, sponsorship and promotional activities, not simply to recommend more monitoring.

The Australian Greens believe that the most appropriate course of action is to ban alcohol advertising, sponsorship and promotional activities altogether – as part of a wider, well-resourced and sustained community education campaign and harm minimisation strategy.

Health warnings

In relation to the issue of health warning labels, there was substantive evidence to the committee that, for labelling to be effective, it needs to be well targeted and designed and to work as part of a comprehensive public education strategy. Australia has an excellent international record in this regard in relation to reducing tobacco-related harm and in tackling drink-driving. The evidence is clear that a long-term, sustained, well-resourced evidence-based campaign is required to make a real difference.

We remain concerned that the evidence from FSANZ suggests that there will be substantial delays before a new food standard for alcohol is developed, and it is not at all clear whether the approach they will take will deliver the kind of labelling

standards required. A number of witnesses, including VicHealth, AER, DrinkWise Australia & Professor Jones presented evidence of the kind of labelling required ... and pointed out the limitations of data derived from studies of small, low quality labels not supported by a wider education campaign. An effective labelling strategy is one where the information and images on the label seeks to remind and reinforce drinkers of the well-targeted messages they have already been exposed to through a wider community education campaign.

The Australian Greens are also concerned by the limitations of an approach which is based on treating and labelling alcohol as a food rather than as a drug of addiction, and believe that a more effective approach to alcohol labelling would be based on the approach taken to tobacco under the consumer protection provisions of the Trade Practices Act.

Referral, Treatment and rehabilitation

The Australian Greens are concerned that the level of resources provided to improve the referral, treatment and rehabilitation of problem drinkers is clearly inadequate and does not reflect the costs of problem drinking to our community or the amount of revenue produced by alcohol excises. As much of the over \$15 billion public price tag attributable to alcohol related harm relates to the increased burden placed on our health system by alcohol-related disease, injury and violence, a greater focus of resource on prevention and treatment could result in a significant reduction in the cost to the community over time.

The committee heard evidence from a range of alcohol treatment and rehabilitation providers that indicated a very high level of unmet demand for services. There was also evidence that the lack of available places and long waiting lists was leading to a situation where the inability of problem drinkers to access services in a joined up manner at the time they needed them was leading to ineffective interventions and many people falling through the cracks. This was particularly true for those who may have been hospitalised and received crisis treatment and were then unable to go straight into a longer-term rehabilitation program.

The Australian Greens believe that the most effective way to ensure that sufficient resources are available for both treatment and education is to directly link service funding to alcohol consumption – through hypothecation of alcohol excises. The excise on all alcoholic beverages should be set so that it sends a clear price signal to young and problem drinkers, and so that it effectively offsets the health and policing costs of alcohol-related harm.

Need for a comprehensive strategy

There has been a consistent theme throughout the evidence presented to this inquiry that an integrated and sustained national campaign similar in the scale and

longevity to previous Australia-wide campaigns addressing the harms caused by tobacco is required to change our drunken culture and reduce the level of alcohol-related harm and violence, especially among the young and those at greatest risk of harm.

The committee was presented with some important evidence of the costs and effectiveness of a range of different approaches to reducing the social costs of problem drinking that have been trialled internationally. The table presented by VicHealth (as reproduced below) gives a useful indication of the most cost-effective approaches. It highlights that effectively regulating pricing, limiting availability, the number and density of alcohol outlets and their operating hours are the most cost-effective strategies.

The effectiveness and cost rating of various alcohol strategies

	Strategy	Effect	Cost
1	Regulate pricing	☆☆☆	\$
2	Lower BAC limits for all drivers	☆☆☆	\$ \$
3	Enforce liquor licensing laws	☆☆☆	\$ \$ \$
4	Limit availability of alcohol	☆☆☆	\$
5	Restrict hours of alcohol sales	☆☆☆	\$
6	Limit density/no. of alcohol outlets	☆☆	\$
7	Community mobilisation	☆☆	\$ \$
8	Workplace interventions	☆☆	\$ \$
9	Curb alcohol sponsorship in sport	☆	\$ \$ \$
10	Social marketing	☆	\$ \$ \$

Source: VicHealth, Submission 49, adapted from Babor *et al* (2003)

It should be noted that VicHealth cautioned that the lack of research on some of the latter measures, including community mobilisation, workplace interventions, and social marketing mean that there is not yet sufficient evidence to accurately assess their cost-effectiveness at this stage.

The Australian Greens do not consider that the current approach being taken by the Commonwealth Government through its National Binge Drinking Strategy and the initiatives of Ministerial Councils on alcohol advertising and health warnings constitute an approach which is either comprehensive enough or has been

sufficiently thought through to prove an effective remedy to reducing the incidence of alcohol-related harm, particularly for young Australians.

The introduction of the National Alcohol Strategy 2006-2009 by the Ministerial Council on Drug Strategy was a step in the right direction and we concur with its aims (to reduce the incidence of intoxication, enhance public safety and amenity, improve health outcomes and facilitate safer and healthier drinking cultures). However, we do not believe that the strategy has been sufficiently resourced to effectively achieve its ambitions, and remain concerned that its three year operational horizon is insufficient – particularly now that it is half way through 2008 with little to show for its efforts.

Recommendations:

- 1. Support well-resourced and targeted evidence-based public education and social marketing campaigns to educate at-risk groups of the risks associated with problem drinking and promote a culture of responsible drinking.**
- 2. Introduce a volumetric tax on alcohol at a rate that sends a strong price signal, with this excise hypothecated to fund substantive alcohol education, treatment and rehabilitation services.**
- 3. A total ban on all alcohol advertising, sponsorship and promotional activities in Australia.**
- 4. Reduce the availability of alcohol through tighter restrictions on the number of alcohol outlets and tighter limits on trading hours.**
- 5. Work with state and local governments to introduce place-based strategies in late-night entertainment precincts and other problem drinking areas to reduce alcohol-related harm and violence and improve public safety and amenity.**
- 6. Support a joined-up client-focussed approach to alcohol referral, treatment and rehabilitation that ensures that those seeking services can access them in a timely fashion and are seamlessly supported throughout their rehabilitation process.**
- 7. Develop identification and referral services for at-risk drinkers to maximise the benefits of early intervention, particularly among younger drinkers.**
- 8. Institute alcohol labelling regulations that stipulate distinctive, graphic and well-designed health warning labels under the consumer protection provisions of the Trade Practices Act comparable to the current regulations relating to tobacco.**

- 9. Ensure that alcohol labels also contain nutritional information including additives and calorific levels – and trial the use of doughnut equivalents as a strategy to reduce binge drinking among younger women.**
- 10. Put in place processes to collect better data on alcohol related harms and costs.**

**Senator Rachel Siewert
Australian Greens**

