

Submission to the Senate Inquiry to the Alcohol Toll Reduction Bill 2007



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Introduction

The Alcohol Tobacco and Other Drugs Council of Tasmania Inc (ATDC) is the peak organisation for non-government alcohol, tobacco and other drug agencies in Tasmania. The ATDC provides leadership, support and independent representation for this sector and works collaboratively with Government, non-government, business and the community to assist in the reduction of alcohol, tobacco and other drug-related harm in the Tasmanian community, and to build capacity and inter-sectoral collaboration between these stakeholders. The ATDC welcomes this opportunity to provide comment on this issue of growing public concern. The ATDC is a member of the Alcohol and Other Drugs Council of Australia and endorses its submission to this Inquiry.

Response to the Bill

The Bill's explicit aims are to "create a culture of responsible drinking, and to facilitate a reduction in the alcohol toll resulting from excessive alcohol consumption, and for related purposes". The ATDC firmly supports the encouragement of a culture of responsible drinking, and believes that the goal of a reduction in the harms associated with alcohol misuse is a worthy one. The key points of the bill are sound, based in reason and the ATDC wholly supports each of them. To restate, the proposals are:

1. Require health information labels on all alcohol products;
2. Restrict TV and radio alcohol advertising to after 9 pm and before 5 am, to stop alcohol being marketed to young people;
3. Require all alcohol ads to be pre-approved by a government body comprising an expert from the medical profession, alcohol and drug support sector, accident trauma support sector and the alcohol industry;
4. Ban alcohol ads which are aimed at children or which link drinking to personal, business, social, sporting, sexual or other success.

On the first point, appropriate labelling can only improve consumers' awareness of safe drinking limits, the risks of excessive use, and help vulnerable people to avoid harm. Restricting the ability of companies to advertise alcohol in the same way may contribute to minimising harms.

A more important step, however, can be found in point three. Certainly, a revision on the body that regulates alcohol advertising is required, given the clear failure of the self-regulating Alcoholic Beverages Advertising Code (ABAC) [See: [Jones, Sandra C., Danika Hall & Geoffrey Munro \(2008\), "How effective is the revised regulatory code for alcohol advertising in Australia?", *Drug and Alcohol Review*, 27, 1 January, pp 29–38.](#)] One would imagine that the fourth proposal would define the approach taken in proposal three.

It is also worthwhile thinking about how this sits in with the broader strategy around alcohol regulation. Research clearly indicates that better integrated responses to issues of complexity like community attitudes to alcohol are significantly more successful in minimising potential harms than a fragmented, amorphous response. [See: [Casswell, S. and Maxwell, A. \(2005\) "What works to reduce alcohol-related harm and why aren't the policies more popular?", *Social Policy Journal of New Zealand*, 25, 118-141.](#)]

Thus, those interventions best supported by evidence of effectiveness for reducing alcohol related problems in the community appear to be through fiscal means (for example, by slightly raising the price of alcoholic beverage through taxation) and slightly reducing the availability of alcohol (for example, by reducing the number of outlets or slightly restricting conditions). Thus, labelling products and limitations on advertisements must be supported by these other mechanisms.

In this sense then, there are a few significant gaps that have the potential to fundamentally weaken the intent of the bill. For example, the terms of reference entirely excludes new forms of media. The text of the bill fails to mention any of the terms “online”, “internet”, “web”, or “video”. This is in conflict of a clear evidence-base that these means are increasingly the primary mechanism by many companies in their targeting of ‘young people’. This is particularly evident in relation to forms of ‘viral’ advertising. [See: Casswell, Sally (2004), "Alcohol brands in young peoples' everyday lives: new developments in marketing", *Alcohol and Alcoholism*, 39(6), pp 471-6.]

Related to this, point four of the Bill rightly flags alcohol ads which are aimed at children or which link drinking to “personal, business, social, sporting, sexual or other success”, but fails to address the possibility of advertisements on web sites that have links [either explicit or implied] to such elements. Thus, for example, if one visits a News Limited or Fairfax-owned site dedicated to AFL, NRL, cricket or so on, it is not uncommon to be presented with pop up or flash ads promoting alcohol products. Given the research that indicates that new media is dominant in the experiences of young people, and will only increase, it seems a potentially damaging gap. It is important to note that the Commonwealth’s proposed national binge drinking strategy talks about a multimedia campaign at the centre of which is the Internet.

Moreover, an again related to this, are potential campaigns on ‘social networking’ sites (e.g. Facebook [FB], My Space [MS] etc). Where might potential law stand there? Are Bundaberg Rum (for example), allowed to have their Polar Bear mascot to have a FB or MS page (this potentially links them into many, many people)? How might legislation respond to this? As it stands, the Bill seeks to have utterly no impact whatsoever. The evidence-base around potentially vulnerable young people suggests that this is a glaring oversight.

Given that the premise of the bill is that drinking is increasingly becoming normal practice among many young people, and that we as a society need to change the culture that supports this behaviour, a range of complementary measures are demanded. This should include all of the points raised by the Bill, supplemented by a more robust interaction with new media forms: a renewed emphasis on responsible service in pubs to prevent drunkenness; creative thinking about the implications of a proliferation of service outlets and their opening hours; better/empowered policing of sales of alcohol to underage drinkers; realistic, practical alcohol education in schools. Obviously, the legislative demands here transcend Federal and State boundaries. Given that most young people will drink alcohol at some point, an integrated national strategy that makes responsible drinking the norm is the best chance at achieving the desired outcomes. The Alcohol Toll Reduction Bill 2007 contributes to this, but falls somewhat short of achieving that.