AMA Submission to Senate Community Affairs Committee inquiry regarding the *Alcohol Toll Reduction Bill 2007*

The AMA is committed to achieving a reduction in the incidence of hazardous and harmful levels of alcohol consumption in Australia. It is pleased to see an increased focus on the harms associated with binge drinking, and welcomes the recently announced inquiry to examine alcohol on a broader basis. The AMA believes it is appropriate to protect particularly vulnerable population groups, such as young people, from alcohol related harms. It is important however, that measures are considered carefully and appropriately targeted.

About the AMA

The AMA is the peak medical organisation in Australia representing doctors across all specialties of medicine and across all of Australia. The AMA's policies on public health issues, including alcohol consumption, are evidenced based and reflect considered medical opinion and are respected by the community, politicians and the media. As a group of professionals who are often involved in the front line treatment of alcohol related health (and social) problems, the AMA has observed recent trends with growing concern.

Alcohol and binge drinking

The AMA's position statement on Alcohol Consumption and Alcohol Related Problems (1998) notes 'excess alcohol consumption is an issue of public health significance, leading to an unacceptably high level of sickness and social disruption. It is associated with diseases of the nervous system, heart, liver and other organs and contributes to many common medical problems, accidents of all types, family breakdowns, unemployment, violence in our society and other alcohol related offences.

The Alcohol Toll Reduction Bill acknowledges the vulnerability of young people who can be involved in risk taking, often with little acknowledgement of the impacts of these choices. The levels of risk are significantly increased when adolescents combine drinking with high-risk activities. AMA policy acknowledges the existence of these significant risks and the needs of young people as a population group.

The current situation

Almost half of the hospital separations related to substance use were due to alcohol use among young people (AIHW 2007).

According to the 2004 National Drug Strategy Household Survey (2004) an estimated 37% of 16-19 year olds and 45% of 20-24 year olds drank at risky or high-risk levels. These rates are almost twice the rate for all Australians.

The Alcohol Toll Reduction Bill 2007

On 14 February 2008 the Senate, on the recommendation of the Selection of Bills Committee, referred the *Alcohol Toll Reduction Bill 2007* to the Community Affairs Committee for inquiry. The Bill proposes a range of measures including:

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

The AMA's positions on the proposals contained within the *Alcohol Toll Reduction Bill 2007* are as follows:

The requirement for health information labels to be on all alcohol products

The AMA believes that standard alcohol drink labelling should include information on the health and social risk associated with excess consumption. This information should be displayed in a prominent position on all alcohol containers and should be easily understood by the consumer (at any age). This type of labelling would be consistent with the mandatory warning labels carried on tobacco products.

All alcoholic beverages must be labelled to clearly specify the percentage of alcohol and the standard drink content.

The requirement that alcohol ads be pre-approved by a government body comprising an expert from the medical profession, alcohol and drug support sector, accident and trauma support sector and the alcohol industry

The proposal for a pre-approval process is a unique aspect of the *Alcohol Toll Reduction Bill 2007*. The AMA sees value in such a proposal.

The medical profession has an extensive role to play in the reduction of alcohol misuse. This role is reflected in the brief interventions that doctors have with their patients, and also in their activities within the AMA to improve public health outcomes. The AMA would welcome the opportunity to participate on such a preapproval body.

 Restrict TV radio alcohol advertising to after 9pm and before 5am, to stop alcohol being marketed to young people.

It has been suggested that alcohol advertising and promotion have increased in recent years. This trend has been accompanied by the development of increasingly sophisticated marketing techniques such as internet advertising. These moves have been complemented by a rapidly expanding 'alco pop' range of drinks.

It is unclear if the proposed restrictions would actually impact on young people's exposure to alcohol marketing, given that young people will very likely be exposed to media outside of the proposed restricted times.

The marketing and advertising of products or services is generally a legitimate activity. However, the targeted marketing of potentially harmful products, particularly to vulnerable groups such as children and young people is of great concern. Such advertising puts those vulnerable groups at higher risk, and also has the potential to undermine public educational messages about appropriate consumption of alcohol. The AMA believes that alcohol producers have a social responsibility to cease targeted marketing to young people on all media platforms at all times.

There needs to be a review of alcohol company sponsorship of sport where the youth market is clearly a target.

• The banning of alcohol ads which are aimed at children or which link drinking to personal, business, social, sporting, sexual or other success.

As stated above, restriction or banning of advertising on radio and free to air television may not prevent exposure to such advertising. The AMA believes that alcohol producers have a social responsibility to cease targeted marketing to young people on all media platforms at all times.

Taxation

Access to alcohol is an important determinant of alcohol use and misuse. Whilst not proposed within the *Alcohol Toll Reduction Bill 2007*, the AMA strongly supports the call for State and Federal Government taxes to directly reflect the total volume of alcohol in the product. Such measures should encourage a shift to the consumption of products containing less alcohol per unit volume. The current method of alcohol taxation may allow some forms of alcohol to be purchased cheaply (or more cheaply than others), potentially encouraging excessive consumption.

Public Education

The AMA also believes that there is a strong need for a wide ranging public education campaign that highlights the risks associated with binge drinking. Because young people will be part of the target audience, there is strong reason for young people to consulted as part of the development of educational media and materials.

Summary

The AMA has long called for alcohol containers to include appropriate health warnings and consequently, it strongly supports this aspect of the *Alcohol Toll Reduction Bill 2007*. The AMA is also supportive of a pre-approval process for advertisements that includes input and participation from the medical profession as well as young people. Appropriate alcohol taxation and a comprehensive public education campaign are critical factors not covered by the *Alcohol Toll Reduction Bill 2007*. The AMA believes that the Bill would be further enhanced through amendments reflecting these factors.