Distilled Spirits Industry Council of Australia
Submission on the West Australian Government
Review of the Liquor Control Act 1988

The Minister for Racing and Gaming, the Hon. Terry Waldron MLA has appointed a committee to review the Liquor Control Act 1988.

The Review Committee is to examine and consider those matters that appear relevant to the operation and effectiveness of the Act, having particular regard to:

- Balancing the requirements of consumers for liquor and related services with minimising harm or ill-health caused to people or any group of people, due to the use of liquor;
- The interests and needs of people selling or supplying liquor; and
- The interests and needs of the tourism industry and other hospitality industries in this State.

The Review Committee will also consider the advertising and marketing of liquor products, and secondary supply legislation, amongst other issues.

The Distilled Spirits Industry Council of Australia (DSICA) is pleased to provide the following submission, which while not specifically addressing all matters under consideration by the Committee, does provide DSICA’s views.

This submission is based on a careful and considered analysis of the available evidence with respect to alcohol consumption in Australia and the appropriate place for liquor licensing regulations and legislation within a comprehensive and socially acceptable policy framework.

DSICA believes that the overarching responsibility of government policy should facilitate the encouragement of moderation in the consumption of alcohol, and reduce (and where possible eliminate) excessive consumption with its negative personal and social consequences.

Whilst the other matters in the terms of reference are recognised as being of importance, the issues of alcohol advertising and marketing, under age drinking, and alcohol related violence in and around licensed venues are particularly relevant to the Distilled Spirits Industry Council of Australia (DSICA).

The submission contents reflect the policy contained in DSICA’s publication Alcohol in Context published in 2011 and containing detailed analysis of the social policy environment in Australia with respect to alcohol. Alcohol in Context also provides policy suggestions for encouraging moderation in the use of alcohol and reducing alcohol misuse and abuse, and a copy is attached.
Distilled Spirits Industry Council of Australia (DSICA)

The Distilled Spirits Industry Council of Australia Inc. (DSICA) is the peak body representing the interests of distilled spirit manufacturers and importers in Australia. DSICA was formed in 1982, and the current member companies are:

- Bacardi Lion Pty Ltd;
- Beam Global Australia Pty Ltd;
- Brown-Forman Australia;
- Bundaberg Distilling Company Pty Ltd;
- Diageo Australia Limited;
- Mast-Jägermeister SE;
- Moët-Hennessy Australia Pty Ltd;
- Rémy Cointreau International Pte Ltd;
- Suntory (Australia) Pty Ltd; and
- William Grant & Sons International Ltd.

DSICA’s goals are:

- To create an informed political and social environment that recognises the benefits of moderate alcohol intake and to provide opportunities for balanced community discussion on alcohol issues; and
- To ensure public alcohol policies are soundly and objectively formed, that they include alcohol industry input, that they are based on the latest national and international scientific research and that they do not unfairly disadvantage the spirits sector.

DSICA’s members are committed to:

- Responsible marketing and promotion of distilled spirits;
- Supporting social programs aimed at reducing the harm associated with the excessive or inappropriate consumption of alcohol;
- Supporting the current quasi-regulatory regime for alcohol advertising; and
- Making a significant contribution to Australian industry through primary production, manufacturing, distribution and sales activities.

Alcohol Policy

DSICA is committed to supporting strategies that can be shown to reduce the uptake of alcohol use by underage Australians, and also to supporting strategies that reduce the levels of harmful drinking amongst adult Australians. We recognise that the overwhelming majority of
consumers drink in moderation, creating no problems either for themselves or society as a whole.

As a matter of principle, we therefore do not support measures that fail to address harmful drinking, and which impose an extra burden on the majority of the drinking population.

Within Australia and internationally, the dominant contemporary approach to alcohol policy is to view alcohol purely in isolation from other critically important social and cultural factors that also impact on societies. This dominant approach to alcohol policy is particularly silent on consideration of the contributing roles of illicit drugs and of polydrug use.

It is critical to move beyond this simplistic notion to a situation where governments recognise the consumption of alcohol as an integral part of the social, economic and cultural context in which it occurs. Policy development that focuses solely on alcohol will fail because it misses the wider picture.

The great majority (82.9%) of West Australian residents consume alcohol and clearly enjoy the personal and social benefits associated with drinking.

For any approach to alcohol policy to be successful, it should:

- acknowledge the place of alcohol in the Australian culture, and
- be aligned with the expectations of that great majority of the community to be able to access and consume alcohol free of unnecessary regulations, while also
- targeting the misuse of alcohol and protecting vulnerable Australians.

As long as the focus of contemporary alcohol policy remains primarily on alcohol use at any level, (and not its misuse) and ignores the reality that the overwhelming majority of Australians drink in moderation, policy responses will inevitably remain narrow and limited in focus. These policies will continue to be ineffective in achieving the goal of a sustained reduction in the misuse of alcohol.

West Australia’s alcohol policies should reflect society’s desire to enjoy the benefits associated with moderate consumption while also acknowledging the need to tackle the negative consequences associated with the misuse of alcohol amongst a minority.

Whole of Population Controls verses Targeted Interventions

DSICA acknowledges that there is considerable public debate regarding the most appropriate policy approach to take with respect to reducing the harms associated with alcohol misuse. However, DSICA does not accept the proposition that whole of population policies are proven to be more effective than targeted policies in reducing levels of alcohol-related harm.

The International Center for Alcohol Policies in its Guide to Creating Integrative Alcohol Policies population model makes the following comments with respect to both approaches:

\[\text{Control measures are aimed at restricting access to and availability of alcohol through a range of measures applied to the population as a whole. The goal of these control measures is to reduce the overall per capita consumption in an effort to reduce the incidence of harm.}\]

\[\text{The ‘control of consumption’ approach relies on the notion of a defined and linear relationship between the level of alcohol consumption across a population and the level of harm.}^1\]

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^1 International Center for Alcohol Policies, Guide to Creating Integrative Alcohol Policies, (International Center for Alcohol Policies, 2008),
Advocates for population-based measures have long argued that reducing overall consumption across all alcohol consumers will impact on the levels of alcohol-related harm. However, the experience is that Governments have increasingly adopted control policy measures, alcohol consumption has consequently fallen, and yet there appears to be no impact on the levels of excessive drinking amongst certain subsets of the community.

Advocates of stronger whole of population measures neglect to include in their evaluations any measure of the loss of enjoyment, pleasure, social interaction and economic benefits that such policies cause through reducing non-abusive and non-harmful consumption.

Population measures are broad and non-specific, and as a result they:
- Cannot differentiate between those who drink responsibly and those who abuse alcohol;
- Are insensitive to variations and cultural differences in the role of alcohol in society;
- Require legislation and structural change for their implementation;
- Rely on enforcement to be effective;
- Are not tailored to the reality of drinking; and
- Are inflexible to change and shifting societal needs.

Conversely, the aim of targeted interventions is to reduce alcohol misuse and the harms that flow from that, not to necessarily reduce overall consumption as its primary goal. Targeted interventions seek to reduce the potential for harm by specifically and selectively focusing on known problematic drinking patterns amongst those individuals, settings and behaviors where risk of harm from drinking is increased. In this regard, targeted measures:
- Specifically address harm where and when it occurs;
- Can be tailored to individual, societal, and cultural differences;
- Do not require structural change or legislation for implementation;
- Make best use of resources that are available;
- Avoid most unintended outcomes by virtue of their specificity; and
- Are responsive to the immediacy of community needs.

A significant benefit of targeted approaches is that they do not rely exclusively on governments for their implementation, but require a whole of community response.

DSICA believes that there is considerable scope for communities of interest to formulate a collective approach to reducing alcohol misuse harms, for example local liquor accords. This approach would provide flexibility for local communities to respond to local issues and problems, rather than an overly-rigid regulatory or legislative approach.

**DSICA’s vision for alcohol policy development**

DSICA believes that a comprehensive and inclusive set of national approaches to alcohol in Australia should have at its core a commitment to the following:
- Partnership between government (Commonwealth, Territory, State and Local), the alcohol industry and other relevant stakeholders;
- Nationally agreed targets for reducing the scale and impact of alcohol misuse coupled with rigorous evaluation of outcomes of all strategies implemented;
- Enforcement of existing regulations targeting underage drinking, public intoxication, and drinking and driving. There is already more than enough legislation in place. The key is to ensure appropriate enforcement of existing legislation, not to create more;
- Targeted education of professionals on evidence-based strategies for tackling alcohol misuse;
- Increased community-based services at the primary care level in the areas of early and brief interventions;
- National mass-media campaigns to increase the reach of messages aimed at promoting a culture of moderation in relation to all alcohol used in Australia;
- Recognition that reducing the misuse and abuse of alcohol cannot be achieved without paying attention to those factors in modern Australia that undermine social cohesion and personal responsibility.

Furthermore, DSICA advocates for the following specific policy objectives:

- Encouraging the consumption of alcohol in moderation;
- Endorsing the absolute right of adults to purchase and consume alcohol without the imposition of intrusive controls;
- Reducing community tolerance towards, and the incidence of, intoxication;
- Developing and implementing comprehensive age-appropriate educational alcohol programs within the school curriculum, including a renewed emphasis on the transition years between school, further education and the workplace;
- Developing and implementing a national approach to appropriately inform pregnant women and other at-risk populations;
- A commitment to rigorous, evidence-based evaluation of policies to ensure efficacy and cost-effectiveness; and
- A commitment that governments treat all categories of alcohol product of equal strength equally.

Objects of the Act

DSICA believes that subsection (4) of Section 38 is too restrictive in its use of wording 'might' in clauses a) and c). 'Might' compels decision makers to take a zero risk approach, rather than applying any sense of probability, proportion, or of what is a reasonable expectation. Anything 'might' possibly happen.

Further, in clause c – whether offence, annoyance, disturbance or inconvenience might be caused to people who work or reside in the vicinity of the licensed premises or proposed licensed premises – sets far too low a barrier for refusing a license. It is a fact of human existence that very trivial and inconsequential matters can create annoyance or inconvenience in some.

‘Vicinity’ is another problematic word in that it depends so much on context and interpretation. Also, vicinity implies a much larger area than location, and has a different meaning for a person in a vehicle than for pedestrians. Combining those elements of the clause with the open-ended 'might' this clause on a strict reading can be used to deny the granting any license.

Alcohol advertising and marketing

DSICA believes there is a clear distinction that needs to be made between alcohol advertising and the marketing promotions on licensed premises for branded products or that venue.
The current West Australian guidelines on bottle store and in-venue promotions already offer a strong and responsive mechanism enabling the Director of Liquor Licensing to restrict or prohibit undesirable venue and product promotions. DSICA does not see any need to further restrict on-premise product and venue promotions.

Alcohol product and retailing advertising is regulated by the Commonwealth, using the quasi-regulatory Alcohol Beverage Advertising (and Packaging) Code Scheme (ABAC).

DSICA submits that the ABAC Scheme works effectively to control the advertising of alcohol. In particular, ABAC sets out stringent standards for the content of alcohol advertising with regard to images, themes or content that might appeal to children and young people. There is no rationale for changing the existing system for monitoring and managing alcohol advertising in Australia.

Australia’s ABAC quasi-regulatory system for alcohol advertising has been negotiated with government, consumer complaints are handled independently, but with all operational costs borne by industry.

The ABAC Scheme is administered by a Management Committee, which includes alcohol industry, advertising and government representatives. Through ABAC, Australia has one of the most accessible complaints systems in the world, accepting complaints via email, letter or fax with no costs to the consumer.

The industry has worked closely with the Australian Government to ensure that ABAC operates in an open and transparent manner, and provides the easiest mechanism by which complaints and concerns with respect to the application of the ABAC code can be managed.

We note the previous Commonwealth Minister for Health’s comments in relation to advertising in the Directions Document “Taking Preventative Action”:

“The Government’s approach is to pursue voluntary and collaborative approaches with the alcohol industry to promote a more responsible approach to alcohol in Australia before considering more mandatory regulation.”

We believe that no reason exists to contemplate more regulation in this area.

DSICA does not support the contention that the alcohol advertising or marketing has a significant, if any, impact on young peoples’ intention to drink or how much they will drink.

The advocates for marketing bans or for greater restrictions on alcohol advertising greatly overstate the importance of advertising and promotions in forming children and young peoples’ attitudes to alcohol and drunkenness. In doing so, they ignore the role of far more significant influences such as parental style and use of alcohol, the extended family’s use of alcohol, and their peers’ attitude to alcohol use and risk-taking.

The academic debate on regulating alcohol marketing is usually silent on the vital roles and responsibilities of parents and carers to supervise those under the drinking age, not only in terms of their access to alcohol, but also in terms of their access to mass media communications which are targeted to an older and more mature population.

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A common argument for regulating alcohol advertising is that if it didn’t work, then companies would not advertise. This begs the question as to what is meant by advertising has ‘worked’.

The purpose of alcohol advertising is to tell potential customers above the legal purchase age who are looking to make an alcohol purchase within a short period of time about the products available to them, so that they can then make informed choices among competing brands. Advertisers’ objectives are to encourage consumers to switch to their brand and to create or maintain brand loyalty. Thus, advertisers gain market share at the expense of other producers, who lose market share. In that sense, advertising ‘works’.

Given that per capita alcohol consumption has been relatively static for the past 20 years and is currently in decline, on that evidence alcohol advertising and marketing appears to have not increased overall consumption.

DSICA also notes that alcohol advertising is one of the most highly regulated forms of marketing in Australia. Some (or all) forms of alcohol advertising are banned in some countries. Notwithstanding the considerable research focus that has been applied to the impact of alcohol advertising particularly on young people over several decades, it has not been reliably shown that alcohol advertising causes an increase in alcohol consumption or alcohol-related harms.

Supporters of a ban or further restrictions on alcohol advertising face the difficult prospect of reconciling the need for that policy change with Australia’s declining rates of underage drinking.

The following graphs are from a report prepared for the Australian Government Department of Health and Ageing, Australian secondary school students’ use of tobacco, alcohol and over the counter and illicit substances in 2011, (referred to as ASSAD 2011).

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There has been an enduring and strident call from advocacy groups proposing significant controls and in some cases bans on alcohol advertising as a means of combating alcohol misuse specifically in relation to young people, irrespective of the lack of a sound evidence base to support this position.

The argument that alcohol advertising leads to an earlier onset of drinking is not a strong argument for greater restrictions, because, as the Australian Institute of Health and Welfare summarised it in 2011, there is simply no such trend:

*The mean ages at which people in Australia first used most licit and illicit drugs have changed very little between 1995 and 2010. For tobacco and alcohol, the mean ages of initiation remained relatively stable between 1995 and 2010, at about 16 years for tobacco and 17 years for alcohol.*

Whilst some research from within the alcohol policy and child health fields purports to show a link between alcohol advertising and problem drinking, there is an absence of compelling evidence to support the view that alcohol advertising causes particular beliefs about drinking, intentions to drink or drinking related problems.

Countering that research from public health researchers, international econometric studies and studies by advertising and marketing academics have failed to consistently show any causal link between alcohol advertising expenditure and increases in alcohol related harm.

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The United States Department of Health and Human Services in an annual report to Congress concluded that there is no significant relationship between alcohol advertising and alcohol consumption. It did not recommend banning or imposing additional restrictions on advertising.

Despite significant increases in advertising expenditure in France, the Netherlands, and the United Kingdom between 1970 and 1990, alcohol consumption declined in all three countries over the same period. The French example is worth examining further because in 1991 it passed legislation greatly restricting alcohol advertising. Despite the advertising ban, the pre-existing trend of declining per capita consumption was not altered.

There is a consensus view amongst social researchers that young people's drinking patterns are complex and influenced by a myriad of interconnected factors. These include genetics, family conditions, socialisation, socio-economic status, and peer influences.

DSICA recognises that industry has a duty of care to our customers, and to the community as a whole to ensure that we advertise our products in a responsible manner.

Substantial efforts have been undertaken by DSICA members, both within their individual companies and as a key national industry representative body, to establish effective mechanisms for ensuring advertising fits within the legislative frameworks established by governments, and these efforts in many cases exceed established government regulations.

Advertising is one of a number of activities that collectively fall under the heading of corporate communications. Other activities include on-premise promotions, sports and cultural events sponsorship, and point of sale information, and product naming and packaging.

All of these activities are regulated effectively under Australia's Alcohol Beverage Advertising (and Packaging) Code (ABAC) scheme, alongside individual companies' global marketing standards, and in DSICA's members' case, by its Statement of Responsible Practices for Alcohol Advertising and Marketing (attached).

There is little doubt that quasi-regulation has substantial benefits over government legislation. These benefits include speed of response, flexibility to changing circumstances, and substantially lower compliance costs. Considerable potential also exists for applying peer pressure within a quasi-regulatory, industry-managed approach. Quasi-regulatory systems for alcohol advertising are used successfully around the world, including across the European Union and in New Zealand.

Within Australia, advertising by alcohol producers must not only be consistent with the ABAC code, but also consistent with several other applicable laws and codes, for example:

- The Trade Practices Act, and State and Territories fair trade legislation
- The Australian Association of National Advertisers Code of Ethics
- The Commercial Television Industry Code of Practice
- The Commercial Radio Codes of Practice


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\(^8\) National Institute on Alcohol Abuse and Alcoholism (2000). 10th Special Report to the U.S. Congress on Alcohol and Health. NIH Publication No.: 00-1583. Washington, DC: USDHHS.
• The Outdoor Media Association Code of Ethics

It is important that the legitimate rights of an industry to market its legal product in a responsible manner are upheld.

In summary:

• The evidence base underpinning the effectiveness of the current quasi-regulatory system is compelling and therefore the West Australian Government should support the system in place, which is an example of international best practice. The current code is working effectively by any reasonable measure, and should be supported to continue to manage and effectively monitor alcohol advertising in Australia.

• To support the strong and principled approach taken by industry to managing the advertising of alcohol in Australia, the West Australian government should place more emphasis on social marketing campaigns that promote moderation and seek to encourage a culture of safe and responsible drinking.

• The West Australian government should undertake community education campaigns aimed at reinforcing the importance of parental responsibility as key drivers of young peoples’ attitudes and behaviour in relation to alcohol.

• A review of school curricular should be undertaken to ensure best practice with regard to alcohol education and an emphasis on culture, values and good citizenship.

Secondary Supply legislation

DSICA is supportive of Australian states and territories introducing secondary supply legislation, in recognition that parents are the largest suppliers of alcohol to underage drinkers.

While other states have highlighted the difficulties in enforcing such legislation, DSICA believes that its existence supports parents in communicating that the onset of drinking should be delayed. The legislation also helps parents reduce peer pressure by weakening the widely held belief that every teenager is drinking, and it also forces parents to explicitly question if alcohol should be supplied to other people’s children.

Alcohol-related Violence

DSICA recognizes that there are very high levels of public concern over violence associated with the excessive use of alcohol. We wish to work collaboratively with governments and other organisations committed to a comprehensive response to reducing alcohol abuse and violence within the Australian community.

DSICA believes that an overly-simplistic policy focus solely on alcohol availability will not give the results the community is looking for in terms of reduced violence. There should be a general recognition that the interrelationship between excessive alcohol consumption and violence is complex, multifaceted and requires consideration of a wide set of interacting variables.

The International Center for Alcohol Policies (ICAP) has identified the following key issues,
which should be taken into account when considering the relationship between the consumption of alcohol and violence within the community:\(^{10}\)

- The vast majority of drinking episodes does not lead to violence, and most violence does not involve drinking.
- The relationship between alcohol and violence is complex and mediated by personality, expectancy of violence, situational factors and social norms.
- In general, violence is likely to be associated with heavy drinking and alcohol abuse.
- The relationship between heavy drinking patterns and violence offers an opportunity for targeted harm reduction measures.
- Addressing individual, environmental, social and cultural factors may help reduce both alcohol abuse and the incidence of alcohol related violence.

The US National Institute on Alcohol Abuse on Alcoholism (NIAAA) has concluded that the findings of research are consistent with the real-world observation that intoxication alone does not cause violence\(^ {11}\).

The Australian Institute on Criminology in its 2009 report Key Issues in Alcohol-related Violence states:

*Despite this strong body of evidence, the relationship between alcohol and violence, like many other complex social phenomena, is not a simple or straightforward one. Research shows that heavy drinking and intoxication are associated with physical violence, however, the majority of people who drink alcohol do not become offenders or victims of violent crime and consuming alcohol does not necessarily act as a precursor to violent behaviour. Instead, research suggests that the association between alcohol and aggression is the result of a complex interaction of a number of variables, including:*

- **The pharmacological effects of alcohol on the cognitive, affective or behavioural functioning of the drinker which can lead to increased risk-taking, reduced anxiety regarding possible sanctions for their behaviour, heightened emotionality, impulsive behaviour, 'liquid courage', a distorted interpretation of events and an inability to resolve incidents verbally**
- **Individual characteristics including age, gender, personality traits, predisposition to aggression, deviant attitudes and expectations of the drinker about the effects of alcohol and their behaviour while intoxicated**
- **Effects of the drinking environment including situational factors such as crowding, permissiveness of violent behaviour, the management of licensed premises and the role and behaviour of venue staff (including managers and security)**
- **Societal attitudes and values, including a culture of drinking to deliberately become intoxicated, using alcohol as an excuse for behaviour not normally condoned, and for holding individuals less responsible for their actions.**

\(^{10}\) International Center for Alcohol Policies, Blue Book Module (7) Drinking and Violence.

\(^{11}\) Alcohol Alert No. 38: Alcohol and Violence, 1997: National Institute on Alcohol Abuse and Alcoholism. USA
The AIC report identifies the risk factors of the venues, staffing, social environment, the entertainment precinct, and of the patrons for violence on licensed premises. These factors are consistent with similar assessments undertaken across a number of countries.

Attention to these variables might be of greater value than a misguided singular focus on hours of alcohol availability. These identified factors and how they work in combination are worthy of careful consideration by licensing and policing authorities.

**The areas that require particular attention include:**

- A state-wide program focused on culture change aimed at reducing excessive and irresponsible drinking;
- A focus on server responsibility programs and the drinking environment;
- Applying the existing rules in relation to public intoxication and alcohol consumption by minors, with an emphasis on providing appropriate resources for police and licensing authorities.

**Policies that West Australia should adopt are:**

- Appropriate resourcing of enforcing existing legislation aimed at reducing public intoxication, underage consumption and social disruption.
- A focus on improved transportation options for night-time precincts.
- Alcohol education campaigns focused on the consequences of excessive and irresponsible alcohol consumption – in partnership between governments and DrinkWise Australia.
- Public information and awareness raising on appropriate drinking patterns.
- Improved screening programs for young problem drinkers, including additional resources for alcohol diversion programs.
- Supporting a nationally agreed approach to server responsibility training with portability of qualifications across jurisdictions.
- Introducing life skills training programs at primary school level to reinforce appropriate socialisation skills, coupled with parent education programs, particularly focused on young parents.
- Focusing on broader societal issues which impact on levels of violence across the community.

**Liquor Licensing**

Appropriate regulation governing the way in which alcohol is supplied to consumers is an important facet of any well-ordered approach to alcohol. The physical environment in which alcohol is consumed can play a major role in determining whether it will be consumed in moderation or in an inappropriate and potentially harmful way.

The balance between regulations that help minimise the risk and harms from alcohol abuse on
the one hand, and the imposition of excessive controls which reduce public amenity on the other, is at the heart of the policy and community debate.

There is a dual role for Police and Liquor Licensing Authorities in administering the licensing laws, but these dual roles can be in conflict, and cause confusion for licensed premises and retailers. Clarifying the relevant roles and eliminating the potential for policy overlap should be a high priority for The West Australian government.

It is important that governments acknowledge that legislation is unlikely to be effective in the absence of adequate and properly targeted enforcement.

Law enforcement authorities are interested in using legislation to tackle broader societal issues such as crime and community safety. The use of legislation to this end may seem reasonable, however, there is growing concern that the application of regulations that impact on all licensed premises in an area, whether they have been associated with inappropriate practices or not, imposes considerable hardship on many well-run and managed facilities.

Concerns over global approaches such as curfews and ‘lock-outs’ are examples where a lack of planning and engagement with the commercial sector has led to significant negative unintended consequences.

The consumer’s preferred drinking environment is important, as there is little or no capacity for liquor licensing laws to impact drinking other than on licensed venues. Concerns in the community over secondary supply of alcohol and social disruption associated with street parties are examples where the licensing laws are largely irrelevant.

It is also important to note the increasing phenomenon of ‘pre-drinking’ or ‘pre-loading’. In this situation young people decide to consume heavily prior to going to licensed premises. Whilst this is not new, there is anecdotal evidence that it is gaining in popularity.

As pre-loading is behaviour driven largely by the cost of drinks served in licensed venues, the West Australian government should consider the likely increase in pre-loading from any new regulations that drive up the cost of trading for licensed venues.

DSICA supports the need for appropriate resourcing of existing licensing legislation ahead of any move to impose new administrative burdens on the retail sector. DSICA notes that in general States and Territories have under-prioritised funding of essential policing and enforcement.