



25 February 2013

Executive Officer
Liquor Act Review Committee
By mail: LiqActReview@rgl.wa.gov.au

Attention: The Executive Officer

Lion Pty Ltd welcomes the opportunity to make this submission in response to the Department of Racing, Gaming and Liquor's review of the *Liquor Control Act 1988*. Lion is a group that includes the former Lion Nathan business of production, distribution and marketing of alcoholic beverages in Australia and New Zealand, and the former National Foods food and beverage business. Lion's head office is located in Sydney with operations in every State as well as in New Zealand, Singapore, Malaysia, Indonesia and the US.

Lion takes very seriously the social, economic and healthcare costs associated with the misuse of alcohol, and believes that we have an obligation to ensure we encourage the responsible consumption of our products and that we play a leading role in promoting a positive drinking culture. We want our products to be consumed responsibly, both because it's the right thing to do and because it will help ensure the sustainability of our business for many years into the future.

For example, we have led the way in delivering products that encourage positive consumption through our innovation and investment in the lower-than-full-strength alcohol segments of the beer market to drive consumer uptake of low alcohol alternatives. Well over one in four beers now sold in Australia is lower-than-full-strength. XXXX GOLD pioneered the mid-strength category when it launched in 1991. It is now the highest selling beer in Australia a first in Australia. Our mid-strength brand Hahn Super Dry 3.5 has a strong foothold in Western Australia. We also lead the market in low alcohol, with Hahn Premium Light.

Lion believes that an evidence-based approach to policy making will lead to the implementation of measures that genuinely do reduce alcohol-related harm without negatively impacting those whose alcohol consumption is not harmful and, in a significant number of cases, delivers health benefits.

We submit that the evidence demonstrates that early targeted interventions result in the most effective reduction in alcohol misuse. We also believe that producers and licensees working collaboratively with local community police, councils, and the licensing authority can reduce misuse and anti-social behaviour.

We believe that it is important that any changes or further restrictions to licensing condition in WA be supported by empirical evidence that demonstrates that such restrictions have reduced alcohol related harm.

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The promotion of alcohol products

In large part, the review canvasses issues that are better responded to by our customers, we did want to take this opportunity to provide some background on the way we approach the advertising and marketing of our products.

Lion is a responsible marketer and endeavours to comply fully with both the letter and spirit of highly effective legislation and self-regulatory best practice codes. We want our products to be consumed responsibly, both because it's right and because it will help ensure the sustainability of our business for many years into the future.

Lion goes to great lengths to ensure our marketing does not contribute to alcohol misuse and we have a range of processes in place across to ensure our marketing does not have any unintended consequences.

We are guided by the Lion Code for Responsible Marketplace Activity which is consistent with all relevant industry codes and is used by our marketers and external agencies to guide all creative development and placement of advertising.

We are also a signatory to or participant in the wide range of existing codes that regulate alcohol advertising, including the Alcohol Beverages Advertising Code, The Australian Association of National Advertisers (AANA) Code of Ethics and The AANA Food and Beverages Advertising and Marketing Communications Code.

Lion has a policy that our single serve containers hold no more than two standard drinks. When promoting our products in licensed environments, we adhere to a number of guidelines and principles to ensure any such activity does not promote irresponsible consumption of alcohol. For example, we place limits on the volume of alcohol required to either enter a competition or that is provided as a prize for a competition in an on premise venue and we do not support time-based promotions or the serving of alcohol in containers that are likely to result in irresponsible consumption.

In conclusion, Lion would like to reiterate that we support measures that serve to address issues related to irresponsible consumption or alcohol misuse, while at the same time recognising that the majority of the population consumes moderately and responsibly and should not be adversely impacted by such measures.

Please don't hesitate to contact me on [redacted] if you would like any further information.

Clause 3(1)

Yours faithfully

Clause 3(1)

Beer Spirits & Wine (BSW) Australia