

13 March 2017

Peter Minchin  
Director Administrative Law  
Department of Racing, Gaming and Liquor  
By email: [rgl@rgl.wa.gov.au](mailto:rgl@rgl.wa.gov.au)

**Re: Inquiry into the availability of packaged liquor in Kununurra and Wyndham**

Thank you for the invitation to make a submission to this inquiry. This brief response is provided on behalf of the McCusker Centre for Action on Alcohol and Youth and the Public Health Advocacy Institute of WA, based at Curtin University.

The McCusker Centre is an independent organisation committed to reducing harms from alcohol among young people. The work of the McCusker Centre is directed towards raising awareness of the magnitude of alcohol-related harms among young people, evidence-based approaches we know can work to reduce harm, other options and the need to act without delay.

PHAIWA is an independent public health voice based within Curtin University, with a range of funding partners. The Institute aims to raise the public profile and understanding of public health, develop and train local networks and create a statewide umbrella organisation capable of influencing public health policy and political agendas. Australian Indigenous health is one of PHAIWA's priority issues.

We thank the Wunan Foundation for compiling this detailed information and appreciate the valuable contributions of the frontline services including St John Ambulance, Kununurra Police, Kununurra District Hospital, Kimberley Regional Youth Justice Services and the Department of Child Protection and Family Support.

The report provides a comprehensive and confronting picture of the broad range of health and social harms caused by or associated with alcohol in this region, and the difficult experiences of the frontline workers who respond to these issues. The statistics and case studies provided point to the significant contribution of alcohol to harms including domestic violence, Fetal Alcohol Spectrum Disorders, child neglect, suicide, sexual assault, injuries and burdens on the resources of frontline services. Further concerns are identified about the normalisation of heavy drinking, and the impact on culture. These harms are not limited to the drinkers themselves; they have far-reaching direct and indirect impacts on children, families, the functioning of the community and the frontline workers whose jobs involve responding to these harms on a regular basis.

We support the Wunan Foundation's assessment of the evidence which suggests strong associations between the amount of alcohol consumed in a population and the level of alcohol-related problems

that occur (page 6). This is particularly concerning as alcohol sales data from 2011/12 (the latest available) show the estimated per capita consumption of alcohol in the Kimberley region was 16.10 litres, substantially higher than the state average of 11.94 litres.<sup>1</sup>

We also support the Wunan Foundation's contention that "there is strong evidence that restricting the supply of alcohol is associated with reduced social harm" (page 2). Research has demonstrated consistent links between the availability of alcohol in a region and the alcohol-related problems experienced there.<sup>2,3,4,5</sup> There is compelling evidence from Australia and elsewhere that regulating the availability of alcohol is an important strategy within a comprehensive approach to reduce the harmful use of alcohol.<sup>6,7</sup> Liquor restrictions, which have taken a number of forms, have made important contributions in a range of areas in WA where benefits have been seen across a broad range of health and social indicators.<sup>8,9,10</sup>

The Wunan Foundation proposes that the current takeaway alcohol limit be halved in Kununurra and Wyndham, and the Takeaway Alcohol Management System be extended to support the monitoring of the takeaway alcohol limit. The existing takeaway alcohol limits in Kununurra and Wyndham equate to two cartons of full-strength beer or six bottles of wine or one litre of spirits per person per day.<sup>11</sup> The existing limits on takeaway alcohol are particularly generous and allow for access to very substantial volumes of alcohol; this is likely to be contributing to the ongoing concerns about alcohol-related harms in these communities. The requested reduction in the takeaway alcohol limit appears to be very reasonable; the proposed limit would continue to allow for responsible drinkers to purchase reasonable quantities of alcohol to takeaway, while reducing the overall availability of alcohol in these communities.

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<sup>1</sup> Loxley W, Gilmore W, Catalano P, Chikritzhs T. National Alcohol Sales Data Project (NASDP) Stage 5 Report. Perth, Western Australia: National Drug Research Institute, Curtin University; 2016.

<sup>2</sup> National Preventative Health Taskforce. Australia: The Healthiest Country by 2020 – National Preventative Health Strategy – the roadmap for action. Canberra: Commonwealth of Australia; 2009.

<sup>3</sup> Chikritzhs T, Catalano P, Pascal R, Henrickson N. Predicting alcohol-related harms from licensed outlet density: a feasibility study, in Monograph Series No. 28. Hobart: National Drug Law Enforcement Research Fund; 2007.

<sup>4</sup> Livingston M. A longitudinal analysis of alcohol outlet density and assault. *Alcoholism: Clinical and Experimental Research*. 2008; 32(6):1-6.

<sup>5</sup> Pereira G, Wood L, Foster S, Haggart F. Access to alcohol outlets, alcohol consumption and mental health. *PLoS ONE*. 2013; 8(1):e53461.

<sup>6</sup> World Health Organization. Global strategy to reduce the harmful use of alcohol. WHO; 2010.

<sup>7</sup> Anderson P, Chisholm D, Fuhr DC. Alcohol and Global Health 2: Effectiveness and cost-effectiveness of policies and programmes to reduce the harm caused by alcohol. *Lancet*. 2009; 373:2234-46.

<sup>8</sup> Midford, R., McKenzie, J., Mayhead, R. (2016). *"It fits the needs of the community": Long-term evaluation of the Norseman Voluntary Liquor Agreement*. Canberra: Foundation for Alcohol Research and Education.

<sup>9</sup> Drug & Alcohol Office. The Impact of Liquor Restrictions in Halls Creek, Quantitative Data - 24 month review. November 2011.

<sup>10</sup> Kinnane S, Farrington F, Henderson-Yates L, Parker H. Fitzroy Valley Alcohol Restriction Report: An evaluation of the effects of a restriction on take-away alcohol relating to measurable health and social outcomes, community perceptions and behaviours after a two year period. Perth: University of Notre Dame Australia, Drug and Alcohol Office, Government of Western Australia; 2010.

<sup>11</sup> Department of Racing, Gaming and Liquor. Factsheet: Liquor restrictions in Kununurra & Wyndham. Available from: <http://www.rgl.wa.gov.au/maps/Restrictions/KununurraWyndham.pdf>

On the basis that the existing levels of alcohol-related harm in these communities are high, the evidence of the effectiveness of strategies to reduce the availability of alcohol, and the reasonable nature of the proposed restrictions, we support the actions proposed by the Wunan Foundation.

We recommend comprehensive evaluation of the impact of the reduced takeaway alcohol limit, with appropriate resourcing and planning to facilitate meaningful evaluation. Evaluation findings would be helpful in informing approaches to managing the availability of alcohol in other areas of WA and elsewhere.

Thank you for the opportunity to make a submission to this inquiry.

Yours sincerely,

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