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Committee Secretary
Senate Legal and Constitutional Affairs Committee
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By email: alcohol.violence.sen@aph.gov.au

Submission to inquiry into the need for a nationally-consistent approach to alcohol-fuelled violence

Thank you for the opportunity to contribute to the inquiry into the need for a nationally-consistent approach to alcohol-fuelled violence.

Alcohol-related violence is an important public health issue of major community concern. Independent market research commissioned by the McCusker Centre for Action on Alcohol and Youth showed that 96% of Australian adults were concerned about alcohol-related violence in Australia in July 2015. Almost half (49%) were extremely concerned.¹ 90% of West Australian adults concerned about alcohol use among young people nominated alcohol-related violence as a top concern in October 2014.²

We strongly support a nationally coordinated response to alcohol-related violence as part of a comprehensive and coordinated approach to the prevention of alcohol-related harms more broadly.

Who we are

The McCusker Centre for Action on Alcohol and Youth 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, the evidence-based approaches we know can work, other options and the need to act without delay. The McCusker Centre supports evidence-based approaches to preventing and reducing harm from alcohol.

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia and works to promote the health and well-being of all Australians. The Association seeks better population health outcomes based on prevention, the social

¹ Independent market research commissioned by the McCusker Centre for Action on Alcohol and Youth, July 2015. Available from: www.mcaay.org.au.

² Independent market research commissioned by the McCusker Centre for Action on Alcohol and Youth, October 2014. Available from: www.mcaay.org.au.

determinants of health and equity principles. The PHAA has a vision for a healthy region, a healthy nation and healthy people living in a healthy society and a sustaining environment while improving and promoting health for all. PHAA is a national organisation comprising around 1900 individual members and representing over 40 professional groups concerned with the promotion of health at a population level. The PHAA Alcohol Policy is available online at <http://www.phaa.net.au/documents/item/228>.

Support for the submission of the Deakin University Violence Prevention Group

We would like to register the support of the McCusker Centre and Public Health Association of Australia for the submission of the Deakin University Violence Prevention Group to the current inquiry. The Deakin University Violence Prevention Group is a leader in research into the prevention of alcohol-related violence and has generated important evidence relevant to this inquiry. We summarise below some of the key messages and recommendations outlined in the Deakin University Violence Prevention Group's submission:

- A nationally-consistent approach to alcohol-related violence should be comprehensive, strongly informed by the best available evidence and focused on evidence-based interventions that are known to be effective in reducing alcohol-related harms. Evidence should be independent and use rigorous research methodologies.
- Consideration of alcohol-fuelled violence must include family and domestic violence, sexual assault and street violence.
- Any response to alcohol-related violence must be multi-dimensional and address the whole range of risk factors across the life course.
- A substantial volume of evidence is available to inform a strong framework to reduce alcohol-related violence, and there is strong community support for action to reduce harm from alcohol.
- Alcohol-related violence is largely preventable. A focus on approaches to prevent violence, including alcohol-related violence, is appropriate, likely to be effective, and preferable to a focus on responses after violence has occurred.
- Evidence strongly supports limiting the availability of alcohol – including by reducing hours of alcohol service (trading hours), pricing controls, and controls on liquor licenses – as a key approach to reducing alcohol problems in the community.
- Restricted trading hours, implemented on a mandatory basis, are one of the most effective measures to reduce harm in nightlife precincts.
- Alcohol makes violence more likely and more severe. Alcohol and other drug use influences the likelihood of people experiencing violence. Intoxication reduces inhibition, impairs cognitive ability and prevents people thinking about the consequences of their actions.
- We can conclude from the available evidence that heavy drinking is a contributing cause of violence. However, the influence of alcohol on individuals is not uniform and the presence of alcohol does not solely determine whether violence will occur. Alcohol contributes to violence in some people under some circumstances.
- High levels of alcohol use and intoxication are strong predictors of involvement in alcohol-related violence. Measures to reduce intoxication and risky drinking behaviours will have a substantial impact on levels of alcohol-related violence.

- There are reasons to question the approach of using tough sentences and other punitive sanctions as an effective deterrent to alcohol-fuelled violence; offenders are unlikely to give full consideration to the consequences of their behaviour while intoxicated.
- Pre-drinking (that is, consuming alcohol before attending licensed venues) is a major driver of intoxication and an increased likelihood of experiencing violence, and has been identified as an impediment to the responsible service of alcohol. Price considerations are an important motivator of pre-drinking behaviours.
- Packaged liquor outlets promote and sell large quantities of alcohol, often at cheap prices, and contribute substantially to alcohol-related harm in the community. The density of packaged liquor outlets is associated with alcohol-related harms.
- The price of alcohol is related to levels of consumption and associated harms. Higher prices are associated with lower levels of consumption. Pricing controls – including a minimum price on alcohol – are important within a comprehensive approach to reducing alcohol harms.
- Monitoring and evaluating alcohol harm reduction measures is critical to understanding which interventions are effective. This requires consistent and high-quality data collection from a range of relevant sources, including emergency departments, and data sharing.
- Current measures are failing to ensure intoxicated people are not subsequently served alcohol in licensed venues.
- Poorly designed education campaigns are unlikely to contribute to harm reduction and may be counterproductive. Weak awareness campaigns may be popular but are likely to be ineffective; alcohol industry initiatives in this area (such as Drinkwise) are ineffective and may delay the implementation of effective measures.
- A consistent national framework of measures to reduce alcohol-related violence and other harms will support market equality across jurisdictions and is likely to increase consumer acceptance of measures.
- A modest levy on alcohol sales may provide a viable funding mechanism for a nationally coordinated framework of effective measures to reduce alcohol-related violence, and will itself contribute to reducing harm from alcohol.
- A coordinated response to reducing alcohol-related harm must be developed independent of alcohol industry influence.

We will not address these areas at length here; please refer to the submission by the Deakin University Violence Prevention Group for further detail on the points noted above.

Below we provide brief additional information to complement the key messages of the Deakin University submission.

Education and awareness initiatives

Public education programs can make important contributions to a comprehensive approach to reducing harm from alcohol if they are research-based, sustained, funded at adequate levels to have an impact, evaluated, and developed and implemented independent of vested interest groups such as the alcohol

industry.³ As noted above, modest, short-term or poorly funded education or awareness campaigns which are not adequately informed by the best available evidence are unlikely to contribute to reducing harm, and may be counter-productive.⁴

The countervailing impact of factors including alcohol marketing, availability and other social norms must also be addressed to support effective alcohol education approaches. There is an urgent need for strong, independent, legislated controls on all forms of alcohol advertising and promotion⁵; the current industry self-regulation has failed to prevent young people's exposure to alcohol marketing or to ensure that alcohol marketing is socially responsible.⁶

Data collection

Nationally consistent and comprehensive data collection is essential to support a coordinated and effective approach to reducing harm from alcohol. Accurate and timely data is critical for informing the development and evaluation of strong, evidence-based alcohol policy. Currently, however, alcohol data collection is ad hoc and incomplete, with considerable variation between jurisdictions. Collection of wholesale alcohol sales data is particularly important to monitor consumption rates and evaluate policy changes, but is not currently routinely collected.⁷ Systematic and consistent collection of alcohol-related data across jurisdictions - including wholesale alcohol sales data, emergency department presentations, hospital admissions and alcohol-related crime data – is strongly recommended.

Funding options for a national strategy

As noted in a recent Perspectives paper in the Medical Journal of Australia, there is broad agreement among health groups of the need for carefully implemented reform of the alcohol taxation system and the introduction of a minimum floor price set at an appropriate level.⁸

These pricing controls would make an important contribution to the comprehensive approach needed to reduce harm from alcohol and could provide a valuable source of funding for alcohol prevention and services. Alcohol tax reform has the potential to reduce direct and indirect harm from alcohol, reduce costs to the health and law enforcement systems and to the community, and create additional revenue which could be directed to appropriate programs to further reduce harm from alcohol.

³ Stafford, Allsop, Daube. From evidence to action: health promotion and alcohol. Health Promotion Journal of Australia. 2014: 25:8-13.

⁴ Pettigrew, Daube, Biagioni. (Ir)responsible drinking campaigns. Medical Journal of Australia. 2014: 200(10):577.

⁵ Alcohol Advertising Review Board. Annual report 2014-15. McCusker Centre for Action on Alcohol and Youth and Cancer Council Western Australia; August 2015. Available from:
<http://www.alcoholadreview.com.au/news/annual-reports/>

⁶ Australian Medical Association. Alcohol marketing and young people: time for a new policy agenda. AMA: Canberra; 2012.

⁷ National Drug Research Institute. National Alcohol Sales Data Project reports available from
<http://ndri.curtin.edu.au/research/nasdp.cfm>

⁸ Daube, Stafford. Alcohol and tax – time for real reform. Medical Journal of Australia. 2016: 204(6).

Economic modelling outlined in the Foundation for Alcohol Research and Education's *Pre-Budget Submission 2016-17* suggests that modest changes to Australia's alcohol tax regime could deliver an additional \$2.9 billion in annual revenue.⁹ A proportion of alcohol tax revenue could be used to address the range of harms caused by alcohol.

Summary

We strongly support a nationally coordinated response to alcohol-related violence as part of a comprehensive and coordinated approach to the prevention of alcohol-related harms more broadly. Within a comprehensive approach, evidence strongly supports restricted trading hours for licensed premises, pricing controls, controls on the physical and economic availability of packaged liquor, strong regulation of alcohol marketing, and sustained, research-based education approaches. Consistent and comprehensive data collection would greatly assist in monitoring alcohol consumption and evaluating interventions. Carefully implemented reform of the alcohol taxation system could provide a valuable source of funding for a nationally coordinated response to alcohol harms, including violence.

Yours sincerely,

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⁹ Foundation for Alcohol Research and Education *Pre-Budget Submission 2016-17*. Available from: <http://www.fare.org.au/2016/03/pre-budget-submission-2016-17/>