

PROVISION OF ALCOHOL TO MINORS

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Inquiry into the Provision of Alcohol to Minors
by the
New South Wales Legislative Assembly Social Policy Committee

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ADCA welcomes the opportunity to provide comment to the New South Wales Legislative Assembly Social Policy Committee's *Inquiry into the Provision of Alcohol to Minors*.

ADCA is the national peak body representing the interests of the Australian non-government alcohol and other drugs sector (AOD). It works with government, non-government organisations, business and the community to promote evidence-based, socially just approaches aimed at preventing or reducing the health, economic and social harm of alcohol and other drugs to individuals, families, communities and the nation. In developing submissions ADCA undertakes broad consultation that includes its members and working groups, the state and territory peaks of the AOD sector, other interested organisations and individuals.

Executive Summary

Underage consumption of alcohol is a major health problem for Australia.

This disturbing phenomenon has been overlooked to a large degree by parents, the wider community and government. At its heart are laws that differ in each State and Territory, in some cases inadequately and nearly always unevenly addressing the secondary supply of alcohol to minors.

The issue of minors' access to alcohol transcends state borders, contributing substantially to the detriment of the wider community; in 2004, the total social cost of alcohol abuse was estimated at \$15.3 billion. The Alcohol Education and Rehabilitation Foundation [AERF – now the Foundation for Alcohol Research and Education (FARE)] estimates that an additional \$14 billion per annum could be attributed to the tangible costs of harm to others and more than \$6 billion to intangible costs. This places the true annual cost of alcohol to society at around \$36 billion.

Young people are in the front line of exposure to the risks of excessive alcohol consumption; heavy drinking is associated with injuries in many settings, including road accidents, falls, fires, drowning, sports and recreational injuries, overdose, assault, violence, and intentional self-harm. The National Drug Strategy 2010–2015 highlights that drinking alcohol in adolescence can be harmful to young people's physical and psychosocial development. Alcohol-related damage to the brain can impair memory and verbal skills, hamper the ability to learn, and lead to problems of alcohol dependence and depression.

The social aspects of alcohol consumption by minors are complex. A minor may regard his or her first drink – or consumption of alcohol at a level that puts young people at risk – as a rite of passage; for that reason, ways of communicating the risk involved need to be explored.

ADCA regards the following as key elements for the inquiry's consideration in addressing alcohol related harm, particularly as it relates to minors:

- Alcohol pricing and taxation
- Alcohol marketing and promotional strategies
- Access and availability of alcohol, including outlet density

While these are largely matters of national focus, the opportunity is there for New South Wales, and other State and Territory jurisdictions to show leadership including action at the local level and to advocate for a consistent, cross-border approach. Without losing sight of the need for consistency, the ability to tackle the second and third points, which evidence shows warrant urgent attention, lies with individual jurisdictions.

The Legislative Assembly Social Policy Committee inquiry's terms of reference indicate its concerns lie chiefly in the realm of secondary supply, the sale or supply of alcohol by adults or other minors to minors away from licensed premises. Secondary supply might also encompass the ways young people gain access to alcohol – other than when it is supplied directly by parents or guardians with their permission and supervision.

ADCA believes that secondary supply should be legislated against in all jurisdictions. Consistency across States and Territories would be beneficial with the introduction and enforcement of legislation accompanied by a comprehensive national communication and education campaign.

ADCA holds an unswerving commitment to broader alcohol issues stemming from these three key points, which have a direct bearing on the health and wellbeing of minors – and their ability to access alcohol. These are discussed later in this submission.

ADCA makes the following recommendations that:

- The New South Wales Government advocates for alcohol pricing reform, with the introduction of a volumetric-based tax in preference to the existing value-based regime, to reduce alcohol related harm
- NSW adopts a policy of collecting alcohol sales data to inform future policy decisions in this area, and encourage other State and Territory jurisdictions to follow suit
- NSW shows leadership in this matter and seek views/support from other jurisdictions, including the Commonwealth, on the introduction of nationally consistent legislation regarding access and supply of alcohol to minors
- NSW adopts a comprehensive public education campaign to accompany any new or amended secondary supply laws
- providing alcohol to minors without parental permission remains an administrative offence
- NSW includes in all new or amended legislation, measures that reduce pressure on minors to start drinking early, and provide parents with good reasons to resist supplying children alcohol for consumption without their supervision
- NSW authorities, in reviewing applications for liquor licences, consider current outlet densities and the potential for additional outlets to contribute to alcohol related harm
- NSW liquor licensing authorities shift the onus of proof to applicants to show that additional outlets will not result in additional harm or undesirable social effects
- alcohol promotions are phased out from times and placements with high exposure to young people aged up to 25 years
- alcohol sponsorship of music events to which children and young people may be exposed is phased out
- the NSW Government end alcohol sponsorship of sports teams, clubs or programs
- the NSW Government encourage alternative forms of sponsorship for sporting bodies, promoting the healthy aspects of sport and recreation, and
- the NSW Government monitors and evaluates the impact of alcohol marketing and promotions, particularly on young people, with the focus on new and emerging activities, including online and using social media, and recommends appropriate legislative and regulatory responses.

Alcohol consumption in Australia

Alcohol is the most widely used drug in Australia (AIHW 2008a). Research shows that 3,494 Australians died in 2004/05 and over one million hospital bed days were directly attributable to alcohol consumption.ⁱ

Next to tobacco, excessive alcohol consumption is the highest risk factor with a direct link to diseases like cancers, stroke, heart attack, and liver cirrhosis, injuries including motor vehicle and bicycle accidents, incidents involving pedestrians, falls, fires, drowning, sports and recreational injuries, overdose, assault, violence, and intentional self-harm (NHMRC 2009ⁱⁱ; Chikritzhs et al 2003ⁱⁱⁱ). Alcohol affects adults, children, family, friends, associates, colleagues and complete strangers.

It has been estimated that harm from alcohol was responsible for 3.2 per cent of the total burden of disease and injury in Australia in 2003^{iv}. In 2004-2005, the social cost of alcohol abuse was estimated at \$15.3 billion. The Alcohol Education and Rehabilitation Foundation [AERF – now the Foundation for Alcohol Research and Education (FARE)] estimates that an additional \$14 billion per annum could be attributed to the tangible costs of harm to others and more than \$6 billion to intangible costs. This places the true annual cost of alcohol to society at around \$36 billion^v.

Current alcohol consumption levels in Australia are high by world standards (WHO 2008) with patterns of high risk drinking among young people and in some Indigenous communities of particular concern. Research shows that occasional or weekend excessive drinking poses the greatest risk in relation to alcohol-related violence, accidents, and injury, thus contributing exponentially to the overall social costs of alcohol misuse in Australia.

The 2010 Australian Institute of Health and Welfare National Drug Strategy Household Survey, which interviewed more than 26,000 respondents over the age of 12, revealed that one in five people over 14 consumed alcohol at a level that put them at risk of harm from alcohol-related disease or injury over their lifetime. The number of people drinking alcohol in risky quantities increased from 3.5 million in 2007 to 3.7 million in 2010.

Similarly, the National Preventative Health Taskforce 2009 “roadmap”, *Australia: the healthiest country by 2020* observed that the occasional short-term consumption of alcohol at harmful levels is a prominent feature of Australia’s drinking culture. One in five Australians (20.4 per cent) drink at short-term risky/high risk levels at least once a month. This equates to more than 42 million occasions of binge drinking in Australia each year^{vi}.

Research suggests that an increase in the availability of alcohol leads to higher alcohol consumption and a corresponding increase in alcohol related harm. In contrast, decreases in alcohol availability result in lower consumption and reductions in harm.^{vii}

The high cost of alcohol related harm to the community also raises the question of the adequacy of medical care in treating alcohol-related disorders. Care Track, a three year study by researchers from the universities of New South Wales and South Australia revealed that only 13 per cent of patients being treated for alcohol dependence received appropriate care, compared with 57 per cent of patients being treated for 21 other common conditions. The study involved more than 35,000 encounters with health professionals in 107 general-practice clinics, 51 specialist practices and 33 hospitals. Care Track is a National Health & Medical Research Council (NHMRC) sponsored program^{viii}.

Alcohol consumption by young people

The 2008 Australian Secondary Students Alcohol and Drug Survey^{ix} provides interesting data on alcohol consumption by secondary school students aged 12-17 years. This survey reveals that at the time of the survey:

- 7% of 12 year olds and 41.4% of 17 year olds consumed alcohol in the past week
- 28% of 12 year olds and 84.7% of 17 year olds consumed alcohol in the past year with on average, 60% of all students (12-17 year olds) drinking alcohol in the past year
- 0.3% of 12 year olds and 18.4 % of 17 year olds (nearly 1 in 5) drank at risky levels (defined at this time as 7 or more drinks for males and 5 or more drinks for females)
- amongst those defined as 'current drinkers' (ie those students who drank alcohol in the preceding week), 12 year olds drank an average of 3.4 drinks per week and 17 year olds drank an average of 8.5 drinks per week
- 34% of 12-17 year olds reported that parents were the source of alcohol
- 38.8% of 12-15 year olds and 39.8% of 16-17 year olds got alcohol from their friends or someone else bought it for them
- 65.6% of 12-17 year olds asked a friend 18 years or older to buy alcohol for them and 13% asked an older brother or sister
- both younger and older students drank less alcohol per week if they obtained their alcohol from their parents than if they obtained it by having someone else buy it for them
- among younger students, average weekly consumption of alcohol was also significantly lower if alcohol was obtained from parents than from friends, and
- younger and older current drinkers drank significantly less alcohol per week if they consumed it at home than at a friend's place or at a party.

This data paints a disturbing picture of a level of drinking amongst young people that puts them at risk from harm. The current NHMRC alcohol guidelines^x are quite clear that young people under the age of 18 should not be drinking (see *National Imperatives* below). Just as worrisome, the current guidelines define risky consumption as more than four standard drinks on any one occasion for both males and females, much lower than the 7 or more drinks for males and 5 or more drinks for females of the previous guidelines. This suggests that under the current guidelines, a much higher proportion of students would be drinking at risky levels.

A summary of secondary supply laws by State and Territory

Laws relating to secondary supply of alcohol to minors in private premises vary across the States and Territories. There are two major issues involved, the first relating to unsanctioned supply, the second to the question of irresponsible supply of alcohol – where a responsible parent, guardian or another adult fails to supervise the consumption of alcohol by a minor.

In New South Wales, the *Liquor Act* provides that a person cannot sell or supply liquor to someone under the age of 18 in a licensed premises or any other place, although a parent, guardian or spouse of a minor who does so is exempted from prosecution. Although the NSW Act has been in force for some years, it is unclear how well the public is informed of this restriction under which a person convicted of an offence outside these parameters can face a fine of up to \$6000.

Queensland laws provide that an adult must not supply alcohol to a minor in private unless the adult is responsible for the minor. A responsible person can be a parent, step-parent, guardian, or an adult with parental responsibilities.

An adult who might have formal charge of a young person on a specific occasion, for example a young person staying at the home of a friend where he or she is subject to supervision by the friend's parent, can be charged with irresponsible supply for providing a minor with alcohol but not supervising its safe consumption. Even parents may be charged with supplying their children excessive alcohol, or not providing adequate supervision, with the penalty for either offence ranging up to \$8000. By December 2009 at least five people had been charged with illegal or irresponsible supply of alcohol to a minor.

Tasmanian legislation regulates the private supply of alcohol to minors. If a person supplies a minor with alcohol on private property and is not the responsible adult, does not have the permission of the responsible adult, and does not supply alcohol in a responsible manner, they may be fined up to \$12,000 or face up to 12 months imprisonment.

The Victorian Government amended the *Liquor Control Reform Act* to make it an offence for a person to supply alcohol to a minor in a private home without parental consent. Anyone who provides alcohol to a minor without that consent will be subject to the same penalty as applies to licensees who supply alcohol to minors in licensed venues – a maximum fine of more than \$7000.

The Northern Territory Government has an offence that makes it illegal for a person to irresponsibly supply minors with alcohol anywhere in the Territory, with fines of over \$13,000.

In South Australia, the lack of formal regulation means that any person can provide any amount of alcohol to any child of any age in a private residence. However, during the preparation of this submission, it was revealed that an opposition member of the state parliament had declared his intention to legislate for tougher laws on the issue, seeking to ban the serving of alcohol in a private home unless the child's parent had given consent for them to consume it. The SA Health Minister was quoted as saying the Government would look at the legislation (based on the Victorian model) but it could prove hard to police, the essence being that it would create an offence in somebody's home.

ADCA supports the current approach by state and territory governments where providing alcohol to minors without parental permission is treated as an administrative offence.

National Imperatives

The Federal Government and national health agencies have previously recognised the need to address the supply of alcohol to minors, with a range of initiatives focusing on the issue in recent years.

The National Health and Medical Research Council: 2009 Australian Guidelines to Reduce Health Risks from Drinking Alcohol^x are highly relevant to the issues canvassed in this inquiry's terms of reference. They address minors' consumption of alcohol, iterating that for children and young people less than 18 years of age, the safest option is to avoid drinking alcohol altogether. The guidelines make a particular point of drawing this to the attention of parents and carers.

- Parents and carers should be advised that children under 15 years of age are at the greatest risk of harm from drinking and that for this age group, not drinking alcohol is especially important.

- For young people aged 15–17 years, the safest option is to delay the initiation of drinking for as long as possible.

The NHMRC bases its approach on evidence that the risk of accidents, injuries, violence and self harm are high among drinkers under 18 years. It warns of a direct link between earlier introduction to drinking and more frequent and higher consumption of alcohol in adolescence, and the development of longer-term alcohol related harms in adulthood. Research also shows that rates of drinking at harmful levels among 12–17 year olds in Australia have doubled in the 20 years to 2007.

The National Drug Strategy 2010–2015 warns further that drinking alcohol in adolescence can harm young people's physical and psychosocial development. Alcohol-related damage to the developing brain can result in impaired memory and verbal skills, hamper the ability to learn, and lead to problems of alcohol dependence and depression.

Mindful of harmful drinking levels, the 2009 National Preventative Health Taskforce paper, *Preventing Alcohol-related harm in Australia: a window of opportunity*, observes that "there is currently a unique window of opportunity in Australia for a significant expansion of activity in the prevention of alcohol-related harm. In part, this opportunity grows from increased community and political concern about the harmful consumption of alcohol (especially focused on youth drinking) and a heightened willingness from all levels of government to take action in the area"^{xi}.

The priorities for preventative action suggested in the paper are reflected in the 2009 document *Australia: the Healthiest Country by 2020*^{xii}.

The National Drug Strategy 2010–2015 supports increased training and support for those at the point of sale of alcohol to reduce the inappropriate supply of alcohol and in particular the supply of alcohol to young people^{xiii}.

The Federal Government referred the issue of secondary supply to the Council of Australian Governments (COAG) which asked the now disbanded Ministerial Council on Drug Strategy to report on options to reduce binge drinking including reckless secondary supply. COAG's Reform Council noted in 2011 under the *National Partnership Agreement on Preventive Health* that jurisdictions had agreed to undertake a range of measures in early childhood education and care environments, schools, workplaces and communities, aimed at countering, among others, excessive alcohol consumption including binge drinking^{xiv}.

In relation to debate about a minimum price for alcohol, the Federal Government has asked the Australian National Preventive Health Agency (ANPHA) to develop further the concept of a public interest case for a minimum (floor) price of alcohol, to discourage harmful consumption and promote safer consumption. Comment on an ANPHA issues paper, which seeks to provide the community with an overview of the minimum pricing issue, closes at the end of July. The paper presents an overview of alcohol consumption in Australia, current alcohol pricing and taxation policies and the potential mechanisms available to reduce harmful alcohol consumption, with a focus on minimum pricing.

Views from across the NGO sector

Some of the issues canvassed in the following section are not directly concerned with the inquiry's terms of reference. However, they warrant consideration in terms of the broader debate on alcohol and the harm it brings on the Australian community.

A range of AOD sector organisations, community groups and individuals have called for a uniform national approach to alcohol, with the Federal Government working with State and Territory jurisdictions on initiatives to reduce alcohol-related harm.

The Australian Drug Foundation and the Alcohol Policy Coalition have issued regular alerts and position statements on secondary supply of alcohol to minors, calling for nationally consistent legislation across the States and Territories as part of a comprehensive response to the issue^{xv},
^{xvi}.

Support is widespread, in keeping with ADCA's recommendation elsewhere in this submission, for nationwide collection of alcohol sales data. This would prove an invaluable tool for a range of applications, including decisions by State and Territory authorities on new liquor outlets, through to policy decisions and legislative drafting. To date, only Western Australia, the Northern Territory, Queensland and the Australian Capital Territory collect sales data.

The impact of parents supplying alcohol to their children is the focus of an Australian study exploring whether parents might play a role in promoting harmful drinking habits among teenagers. The study by the University of New South Wales' National Drug and Alcohol Research Centre focuses on 1800 students in private and Catholic high schools in NSW and public school students from Tasmanian and Western Australian. The project, involving 13-to-17 year old students and their parents over a five-year period and due for completion by 2015, is being partly funded with a grant from FARE^{xvii}.

The Victorian-based Keep 'em Safe campaign has united with other community groups and the Australian Drug Foundation to push for nationally consistent secondary supply legislation. The Keep 'em Safe website states that on average, one young person in Australia dies each week from alcohol related causes and many others are harmed or potentially at risk of harm and as a result may never reach their full potential. Keep 'em Safe has raised awareness on issues surrounding young people and alcohol and developed community partnerships with Deakin University, schools, Lions Clubs, Communities That Care and the Leigh Clark Foundation.

The National Alliance for Action on Alcohol (NAAA), a coalition of more than 70 health and community organisations, says there has been insufficient focus or discussion about action to reduce the toll of alcohol harm in the Australian community. NAAA recommends the establishment of a comprehensive framework^{xviii} to:

- ensure effective regulation of advertising and promotions for alcohol, including a special focus on minimising the exposure of children and young people to alcohol marketing and promotions
- include the phasing out of alcohol sponsorship of music events to which children and young people may be exposed, and the prohibition of alcohol sponsorship of junior sports teams, clubs or programs
- cover all forms of alcohol marketing and promotions, including point-of-sale promotions, print and media advertising, packaging, labelling, sponsorship, viral and internet campaigns

The Public Health Association of Australia says there has been little focus or even discussion about action to reduce the massive toll of alcohol harm in the Australian community. It describes the issue as particularly disappointing in the light of evidence that young people increasingly drink to get drunk, that violence in the community is increasing and workplace productivity falling.

The Australian Medical Association, a fellow NAAA member also considers that more could be done to reduce the harms of excess alcohol, especially among teenagers and young people.

ADCA addressed many of these issues in its response to the DoHA Consultation Paper for the Expansion of the National Binge Drinking Strategy: the objectives of the Community Sponsorship Fund^{xix}.

With respect of taxation, ADCA's submission to the 2010 Henry Taxation Review argued that liquor taxation should be based on a volumetric regime, with rates based on alcohol content for all alcoholic beverages, and alcohol taxation rates increasing progressively over several years, beyond the adjustments to the CPI presently in effect (currently, wine is taxed based on the value of the product, which means that low cost wine is taxed less than more expensive wine, creating an incentive to produce cheap wine). The revenue from any increase in taxes should be earmarked to support increases in treatment services and prevention programs for alcohol problems.

The physical and economic availability of alcohol should be restricted and more highly regulated, with State and Territory Governments creating risk-based licensing approaches, introducing licensing measures such as those introduced in Newcastle in 2008 and in Townsville recently.

ADCA has long held the view that the Federal Government should regulate alcohol advertising and promotion - independent of the alcohol industry. Further, restrictions should be imposed on the way alcoholic beverages are advertised and marketed, especially to young people.

ADCA also believes that health warning and nutrition information labels should be mandatory for all alcoholic products and that advertisements for alcoholic beverages in any medium must include a series of warning messages about the potential harm like those introduced for the tobacco industry.

Inquiry terms of reference

ADCA makes the following general observations. The issues that surround the provision of alcohol to minors go far beyond the parameters of the inquiry's terms of reference and ADCA hopes that the preceding body of the submission helps inform the inquiry's deliberations.

The sufficiency of provisions of the liquor act which make it illegal to sell or supply alcohol to minors, including in homes, parks and public places generally

While the following factors are not primarily linked with secondary supply, the introduction of more retail outlets intensifies the regulatory dilemma that police and other authorities face – particularly in relation to the ability of minors to access alcohol and increased opportunities for them to do so.

- Highly pertinent to the situation in New South Wales is the finding of the State Government's Bureau of Crime Statistics and Research that directly correlates liquor outlet density with the incidence of assaults. The Bureau notes that more than half the assaults that police report in the Sydney CBD occur within 50 metres of a liquor outlet.
- The NSW Legislative Assembly's Social Policy Committee would be aware that the Allen Consulting Group is investigating the density of liquor outlets on behalf of the NSW Office of Liquor, Racing and Gaming. It is in this climate that NSW licensing authorities have recently announced approval for at least nine ALDI stores to enter the liquor trade in the already heavily over-served Hunter region around Newcastle.

The appropriateness of provisions of the liquor act which provide that a person, other than a parent or guardian, must not supply liquor to a minor

Provision should be made in all new or amended legislation for measures that:

- Reduce pressure on minors to start drinking early

- Provide parents with a good reason to resist supplying them alcohol for consumption without their supervision
- Give parents clear reasons and support to impose boundaries and help them with parenting.

The appropriateness of the defence against prosecution for providing liquor to a minor if it is proved that the defendant did so under authorisation from the minor's parent or guardian

- This again raises the question of whether parents or guardians are sufficiently aware of their responsibilities under law in terms of approving the supply of liquor to a minor under their care and in monitoring the amount of alcohol and the manner in which it is consumed by the minor.

Whether there is broad community understanding of the rights and responsibilities of parents, guardians and responsible adults re the provision of alcohol to minors

- Research shows that between 30 and 50 per cent of Australian adolescent drinkers obtain alcohol from their parents, the suggestion being that it is more the norm for parents to be involved in minors' alcohol use^{xx}.
- Family support, shown by research over the past three decades to be one of the strongest factors in successfully countering drug and alcohol dependence, is not always forthcoming where parents or legal guardians may also be affected by alcohol or other drugs
- The broader family may often need as much support as a family member affected by alcohol or other drugs
- secondary supply laws need to be accompanied by a comprehensive public education campaign

Whether New South Wales can benefit from other jurisdictions' experiences relating to the provision of alcohol to minors by parents, guardians or responsible adults

ADCA believes the disparity across the States and Territories in the interpretation of laws that relate to minors' access to alcohol is an important element for the inquiry's consideration. As previously stated, the issue transcends borders and the experiences, state by state, territory by territory, vary widely.

- While laws of varying strictness apply in licensed premises across all States and Territories, it is still legal in some for another person to supply an under-age child with alcohol in a private residence without parental or guardian's permission.
- New South Wales can learn from the Queensland experience of so-called "schoolies week" laws that the Queensland Police Union described as "almost impossible to enforce". Police found that the laws introduced in 2008 were poorly constructed and ill-conceived.
- A recent Western Australian Health Department survey of almost 14,000 people points out that one-third of WA adults drink at levels likely to increase their risk of long-term alcohol-related harm. Survey analysts say this indicates that people either do not understand or are ignoring national guidelines for safe drinking. The survey revealed that 61 per cent of male drinkers and 37 per cent of females have more than the recommended limit of two standard drinks a day^{xxi}.

- New South Wales can draw from its own research by the Bureau of Crime Statistics and Research on the correlation between liquor outlet density and assaults in assessing the risk of minors gaining access to alcohol.

Community perceptions relating to the terms of reference

Community reactions to issues often provide the greatest clarity of insight, based on personal experience and therefore offering invaluable food for thought for policy makers and those who draft legislation. The question of parental control, the knowledge of laws governing the provision of alcohol to minors and the responsible supervision of minors' consumption of alcohol are common threads in discussion of young people and alcohol.

The following statements are from the *Drink Tank* blog on the issue of secondary supply.

"Secondary supply laws must be accompanied by a comprehensive public education campaign. Victoria was the latest state to introduce these laws where they were accompanied by a public education campaign to educate parents, young people and the wider community about the new laws and the reasons behind them."

"These secondary supply laws that exist in some states, I question how well they are enforced and if they are effective at all. I imagine it would be quite difficult to enforce such legislation with secondary supply often occurring in the home."^{xxii}

An extract from a July 2012 report in Brisbane's Courier Mail reinforces these sentiments. It says only 44 adults have been fined for supplying alcohol to minors since laws were introduced to curb wild parties and out-of-control schoolies four years ago, with police saying they don't have time to enforce the laws and highlighting the difficulty of proving that an adult "recklessly" supplied alcohol. The article says some police were unaware that parents could be charged^{xxiii}.

I would welcome the opportunity to discuss this submission further.

Yours sincerely

David Templeman
Chief Executive Officer

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