

Dr Stewart Smith  
Director  
Standing Committee on Social Issues  
Legislative Council, NSW Parliament  
Parliament House  
Macquarie Street  
Sydney NSW 2000

Dear Dr Stewart

### **Inquiry into the strategies to reduce alcohol abuse among young people in NSW**

Thank you again for the opportunity to appear before the above Inquiry on Monday 6 May 2013. While alcohol related problems extend far beyond short term risk associated with excessive consumption of alcohol by young people, consumption patterns by this group are a concern.

ADCA has looked through the transcript of evidence and has taken action to respond to the questions taken on notice. Attached is a marked version of the report on the proceedings. Please note that on page 66, where Ms Crane refers to FASD data in NSW, 'we' refers to ADCA specifically, not on the general availability of the data in NSW, although our understanding is that there is little information available. Note also that on page 68, Mr Templeman has referred to Kermit the frog with a bottle of gin. You will be aware from the pictures distributed at the hearing that Kermit was in fact pictured with a bottle of Jim Beam.

In response to questions taken on notice:

#### **1. Source of the picture of Kermit the frog**

This picture was originally viewed on the University of Western Australia's *Jim Beam on Campus* Facebook page some time ago. The picture is no longer available from this site but can be found online at <http://www.flickr.com/photos/anivyl/409556975/in/photostream/> (last viewed on Tuesday 28 May 2013). A search of the Jim Beam Facebook page revealed a number of images which incorporate images that would appeal to children. Likewise on the Jack Daniels Facebook page. Please see a sample of images at Attachment One. Note that the Jack Daniels page also includes an image with Kermit the Frog. While these images are mostly amateur photos that have been uploaded onto the relevant Facebook pages, these companies are allowing the images to remain on their website, able to be viewed far and wide. Although these pages are theoretically age

protected, individuals are not prevented from trying to re-access the site with a different age, should they fail to access the site on their first attempt.

## **2. Relative price of beer wine and spirits over the past 20-30 years**

Attachment Two provides data on the price of alcohol relative to CPI and average weekly earnings over the past 30 years. These graphs use data from the Australian Bureau of Statistics as their source.

On other matters:

## **3. National Binge Drinking Campaign**

The hearing asked about the National Binge Drinking Strategy (NBDS) and whether it had been evaluated. To clarify funding arrangements for this strategy, the Government announced funding of \$103 million for the NBDS in 2008. An initial commitment of \$53.5 million was made over four years, and a further \$50 million dollars committed in 2010 for the period 2010-11 to 2013-14.

The first two phases of the Strategy were managed by the Department of Health and Ageing ([www.alcohol.gov.au/internet/alcohol/publishing.nsf/Content/cli](http://www.alcohol.gov.au/internet/alcohol/publishing.nsf/Content/cli)).

Responsibility for the strategy now rests with the Australian National Preventative Health Agency (ANPHA)

(<http://anpha.gov.au/internet/anpha/publishing.nsf/Content/NBDS>).

An initial evaluation of the strategy was undertaken in 2009, which showed early signs of a positive impact of the campaign

([http://www.drinkingnightmare.gov.au/internet/drinkingnightmare/publishing.nsf/Content/3F34473572CF15F2CA257679007C3A7A/\\$File/eval.pdf](http://www.drinkingnightmare.gov.au/internet/drinkingnightmare/publishing.nsf/Content/3F34473572CF15F2CA257679007C3A7A/$File/eval.pdf)). ADCA is not aware of any subsequent evaluation.

## **4. Minimum price for alcohol**

ADCA undertook to provide the Inquiry with its submission to the ANPHA issues paper on *Exploring the Public Interest Case for a Minimum (Floor) Price for Alcohol*. ADCA's submission can be found at Attachment Three.

## **5. Environment and Venue Assessment Tool (EVAT)**

While the Allen Consulting Group undertook a consultation early in the project to hear from interested stakeholders, which ADCA participated in, there was no further consultation on the development of this particular tool as far as we are aware.

ADCA has looked at the information that is publicly available and makes the following observations based on the EVAT Fact sheet

([http://www.olgr.nsw.gov.au/pdfs/EVAT\\_FactSheet.pdf](http://www.olgr.nsw.gov.au/pdfs/EVAT_FactSheet.pdf)):

- ADCA sees merit in the identification of different categories of risk and that factors within each type of risk category are given a weighting of low, medium or high
- the tool appears to be focused on short term risk only

- the parameters around the risk levels for patron capacity and extended trading hours are not clear
- packaged liquor venues are given a low risk rating however we know that these venues are associated with preloading behavior, high levels of domestic violence<sup>1</sup> and long term harm (through availability of cheap alcohol comes)
- there is no mention of drawing information from hospital/emergency services – these services are at the coalface of alcohol related violence
- it is important to make sure that assaults data includes domestic violence data because of the strong correlation between high levels of alcohol use and domestic violence
- the tool does not include factors associated with different types of activities within the premise eg happy hours, 2 for 1 offers etc which encourage consumption.

The flow chart of the liquor licence application process confirms that the tool is all about short term risk

([http://www.olgr.nsw.gov.au/pdfs/EVAT\\_Licence\\_Application\\_FlowChart.pdf](http://www.olgr.nsw.gov.au/pdfs/EVAT_Licence_Application_FlowChart.pdf)).

Other comments include:

- Only some applicants need to provide a community impact statement (CIS) – there is no indication of how this is determined and why this is the case; all venues should provide a CIS
- No indication of whether the CIS becomes publicly available so that stakeholders can see how their concerns have been represented and respond accordingly
- No advice to Health that an application for a license has been lodged
- During the EVAT trial, once an application is assessed against the EVAT, low risk applications will be sent to the NSW Trade and Investment assessment team, but this doesn't look like it will be standard practice, suggesting that low risk applications might be accepted based solely on the EVAT without further review.

ADCA will be interested in the outcomes from the trial of the EVAT and the evaluation report when it is released. ADCA recommends that the EVAT is developed further to take into consideration long term risk associated with alcohol consumption and the high risk of preloading behavior and domestic violence associated with packaged liquor outlets, particularly in suburban areas.

---

<sup>1</sup> A longitudinal analysis undertaken in Melbourne comparing alcohol outlet density and domestic violence in Australia showed a positive association between alcohol outlets and rates of violence, across several liquor licence categories. The strongest correlation was between packaged liquor licences (standalone bottle shops) and domestic violence rates. A small but positive association was also observed with general (eg pubs and most nightclubs) and on-premise licences (eg restaurants and bars). Livingston M 2011 *A longitudinal analysis of alcohol outlet density and domestic violence* *Addiction*,106, 919–925

ADCA would be happy to provide additional support to the Committee if needed. The culture of alcohol consumption in Australia today is a significant concern for all. Action is needed to change this culture of excessive consumption to more moderate patterns. ADCA is not 'anti-alcohol' as the industry would have people believe; our priority is on minimising the harm from excessive consumption, in both the short and the long term.

Kind regards

David Templeman  
Chief Executive Officer

3 June 2013