

**INQUIRY INTO STRATEGIES TO REDUCE ALCOHOL
ABUSE AMONG YOUNG PEOPLE IN NSW**

Organisation: Cancer Council NSW

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**Cancer Council NSW submission to the Standing Committee on
Social Issues, Parliament of New South Wales
Inquiry into strategies to reduce alcohol abuse among young
people in NSW**
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Introduction

Cancer Council NSW's vision is 'cancer defeated'. Our mission is to defeat cancer by engaging the community. Cancer Council NSW focuses on cancer research, prevention programs, advocacy, and providing information and support for people affected by cancer. Cancer Council NSW is interested in simple, consumer-friendly messages to assist Australians to make healthier choices. Cancer Council NSW has a series of evidence-based recommendations aimed at preventing cancer at the population level, and one of these includes limiting alcohol consumption.

Alcohol increases cancer risk, and is responsible for about 5,070 cases of cancer in Australia each year.¹ Cancer Council NSW supports evidence-based action to reshape Australian social attitudes towards drinking, and to reduce the burden of morbidity and mortality caused by alcohol use.¹

Cancer Council NSW is a member of the NSW/ACT Alcohol Policy Alliance (NAAPA), and as such supports the adoption of the three policy priorities – reducing alcohol availability; consistent alcohol pricing and reducing promotion of alcohol; and increasing community engagement in alcohol solutions.

We welcome the opportunity to comment on the inquiry into strategies to reduce alcohol abuse among young people in NSW. In this submission, Cancer Council NSW has focussed on the aspects of the inquiry that we, as an organisation, are best placed to assess the likely impact; that is, (a) the effect of alcohol advertisements and promotions on young people, including consideration of the need to further restrict alcohol advertising and promotion; (b) the effectiveness of alcohol harm minimisation strategies targeted at young people; (c) measures to minimise the impact of alcohol in the workplace; (f) measures to address the impact of alcohol abuse on the health system; and (g) any other related matter. Additionally, we have provided comment on other alcohol policy opportunities that may be relevant to the Standing Committee on Social Issues.

At the State level, the NSW Government can act to reduce the harms associated with alcohol use through the *Liquor Act 2007*, and through the implementation of health-promotion programs. While Cancer Council NSW recognises that many of the issues raised in this submission are issues that fall into the domain of Federal Government action, policy or legislation, we urge the NSW Standing Committee on Social Issues to support these regulatory approaches and advocate for regulatory reform with their Federal Government colleagues.

Cancer Council NSW believes that changing alcohol use in young people will require a significant shift in Australia's cultural beliefs around alcohol and drinking. Young people must be supported to make healthier drinking choices, and positively influencing the drinking culture can reduce alcohol consumption in the long term, and hence improve young people's future health. As such, a broad range of policy interventions will be required. Cancer Council

NSW recommends the following to help address the issue of alcohol use and abuse by young people:

Cancer Council NSW recommends:

1. That the Federal Government assumes responsibility for the regulation of alcohol advertising in Australia to reduce the impact of alcohol advertising and promotion on children and young people. The advertising codes should be administered by an independent body with the power to monitor, investigate and penalise breaches of the code. The NSW Government should advocate for the Federal Government to take this approach through its roles on the Council of Australian Governments and the Intergovernmental Committee on Drugs.
2. In the absence of mandatory regulation, the current Alcohol Beverages Advertising (and Packaging) Code (ABAC) should be strengthened by including the following amendments, to reduce the harms associated with children's exposure to alcohol advertising:
 - a) Expanding the regulations to encompass advertising placement and not just content of the advertisements;
 - b) Expanding the regulation so that compliance is mandatory for all sectors of the alcohol industry, including independent producers and the retail sector;
 - c) Abolishing the exception that allows alcohol advertising during live sporting events before 9.00pm;
 - d) Introducing regulations to stop the sponsorship of sporting and cultural events popular with children and young people, and amateur sporting clubs with underage members or teams;
 - e) Ensuring that any alcohol advertising code includes a clause that relates to the drinking culture, in terms of not allowing advertisements and promotions that normalise frequent and excessive alcohol consumption;
 - f) Reviewing the membership of the ABAC Scheme management committee to ensure that members are independent of the alcohol industry; and
 - g) Including a minimum of two public health representatives on the management committee of the ABAC Scheme.
3. The *Liquor Act 2007* should be amended to ban competitions and promotions that encourage rapid consumption of alcohol, drinking to excess or intoxication.
4. The NSW Government should consistently consider the long-term, chronic health issues (such as cancer) associated with high levels of alcohol consumption and not just the short-term, acute harms, when planning harm minimisation programs and education campaigns.
5. The NSW Government should introduce primary prevention and education programs delivered through the Healthy Workers Initiative, aimed at reducing workers' consumption of alcohol and influencing the drinking culture, and evaluate these programs comprehensively to build the evidence in this area.
6. The NSW Government should broaden the scope of its policy, public education and health promotion in state alcohol plans to include initiatives aimed at reducing the harms associated with long-term consumption of alcohol to reduce the burden of alcohol-related chronic disease in the NSW population. This is important to prevent young people from establishing long-term patterns of high levels of alcohol consumption over their lifespan.
7. The NSW Government should advocate for reframing the issue of the binge drinking culture to one of sensible drinking, and as such broaden the standpoint from a harm minimisation issue to a health promotion issue.

8. The NSW Government should advocate for effective policy change at the national level through the Council of Australian Governments and the Intergovernmental Committee on Drugs. Effective policy options for reducing young people's consumption include alcohol taxation reform and restricting the availability of alcohol.

Background

Alcohol and cancer risk

The International Agency for Research on Cancer (IARC) classifies alcohol as a known human carcinogen.² There is convincing evidence (IARC's strongest evidence classification level) that alcohol causes cancers of the mouth, throat, larynx, oesophagus, bowel, liver and breast.^{2,3} Cancer risk increases linearly with the amount of alcohol consumed, and there is no 'safe' level of alcohol consumption when it comes to cancer risk.^{3,4} All types of alcohol increase cancer risk,²⁻⁴ and although alcohol plays a role in preventing some types of chronic disease, the proportion of the total burden of disease that alcohol prevents (0.9%) is outweighed by the proportion that it causes (3.2%).⁵ Cancer Council NSW recommends that to reduce cancer risk, people limit their consumption of alcohol, or better still, avoid alcohol altogether.¹

Projections indicate that cancer incidence will be 44% higher in 2021 than it was in 2006.⁶ Cancers of the bowel and breast, both linked to alcohol, are the second and third most common cancers in NSW.⁶

Young people's drinking habits

The National Health and Medical Research Council (NHMRC) Australian Guidelines to Reduce Health Risks from Drinking Alcohol advise that for under 18-year-olds, and particularly children under 15 years, not drinking at all is the safest option.⁷ For 15 to 17-year olds, initiation of drinking should be delayed for as long as possible.⁷ Yet the NSW School Students Health Behaviours Survey in 2008 found that 90% of 16 to 17-year-olds and 72% of 12 to 15-year-olds had already consumed alcohol.⁸ More than half of those aged 16 to 17 years and a quarter of those aged 12 to 15 years had consumed alcohol within the previous month.⁸

Cohort studies surveying the same group of participants over many years have traced patterns of alcohol use from adolescence to adulthood. Those who drank most as teenagers went on to become the heaviest drinkers as adults, and those who drank moderately as teenagers had the greatest increase in drinking during the transition into adulthood.⁹ Those who did not drink at all as teenagers, on the other hand, generally became moderate drinkers in adulthood.⁹ Therefore young people should be encouraged to delay consumption as long as possible.

Apart from the risk of becoming heavier drinkers in the long term, consumption of alcohol can be detrimental to adolescents' cognitive, social and emotional development.¹⁰ It is for this reason that the Australian alcohol guidelines recommend that not drinking is the safest option for teenagers, and that initiation to drinking should be delayed as long as possible.⁷

The Australian School Students Alcohol and Drug Survey 2008 found that the most common source of alcohol for adolescents aged 12 to 17 was their parents (34%), meaning that often alcohol was provided by others.¹¹ Many Australian parents introduce teenagers to small amounts of alcohol in a supervised home environment in the belief that it is not harmful or may be beneficial because it 'teaches' moderate use.¹²

Apart from family influences, adolescents are also influenced by their peers.¹³ Other factors known to increase adolescent alcohol use include alcohol advertising and promotion,^{14;15} lower alcohol prices¹⁶ and increased availability of alcohol.¹⁷ These areas are those identified by the NAAPA as policy priorities for alcohol action in NSW,¹⁸ and echo best-practice recommendations from the National Preventative Health Taskforce.¹⁹

a) Alcohol advertising and promotions

Children are a vulnerable audience for advertising, with research showing that many children are not able to recognise advertising's persuasive intent, even once they reach high school age.²⁰ Australian adolescents are more likely to want to try different types alcohol after they have been exposed to alcohol advertisements.²¹ As Australian alcohol advertisements typically link alcohol consumption with positive messages of fun, friendship and social situations,²² their appeal to children and/or adolescents is of concern.

The National Preventative Health Taskforce recommended that addressing the cultural place of alcohol, including the restriction of alcohol marketing, should be a priority for the Australian government.¹⁹ Currently, alcohol advertising is 'regulated' by a 'quasi-regulatory' approach, centred on the Alcohol Beverages Advertising (and Packaging) Code (ABAC) Scheme. Cancer Council NSW is firmly of the view that this self-regulatory approach to alcohol advertising is ineffective in preventing alcohol advertising to young people.

Problems with the current alcohol regulatory system

The current quasi-regulatory approach in Australia has a number of loopholes that can be exploited by alcohol advertisers. For example, a recent study found that about half of all alcohol advertising on television in Australian capital cities occurred during children's peak viewing times (between 7.00-9.00am and 3.30-10.30pm weekdays, and 7.30-10.30am and 3.30-10.30pm weekends), and promoted alcohol consumption as a fun, social and inexpensive activity.²² This demonstrates the ineffectiveness of the current regulations in reducing children's exposure to alcohol advertisements, and highlights this particular loophole in the ABAC Scheme.

According to the ABAC Scheme, the average length of time for a determination to be reached is 25 business days.²³ However, advertising campaigns can be run in shorter timeframes than this, meaning the campaign may have run and ended before the ABAC Scheme has come to a determination. In this manner, the complaints process is not effective in keeping up with the fast pace of the advertising industry, and is not responsive to consumer concerns. Further, consumers are generally unaware of where to direct complaints on alcohol advertisements.²⁴

The ABAC Scheme only covers advertisement content and not placement of advertisements. In this respect, alcohol advertising is allowed in mediums where there are large numbers of young people in the audience, such as during live sporting broadcasts, sponsorship of children's sport, elite sporting and cultural events, and on new digital media (such as social media, mobile device applications or online). In this respect, the ABAC Scheme is narrow in its focus and therefore not effective in reducing young people's exposure to alcohol advertising.

Additionally, the adjudication or management committees of the ABAC Scheme have no jurisdiction to enforce penalties for upheld complaints. Therefore there is no onus on industry members to adhere to the Code, limiting its strength in preventing children's exposure to alcohol advertising. Further, the ABAC Scheme does not cover all sectors of the alcohol industry. As such not all companies that market alcoholic products likely to be popular with young people, such as the Independent Distillers Group (who manufacture brands including

Vodka Cruiser and Woodstock Bourbon) and retailers such as bottle shops are signatories to the ABAC Scheme and therefore do not have to comply with the Code.

Public support for alcohol advertising restrictions

The majority of the Australian public (64%) supports restrictions on television advertising of alcohol before 8.30pm every day.²⁴ Further, surveys of Australian parents found that most did not consider alcohol companies or businesses that served alcohol to be appropriate sponsors for children's sport.²⁵ Sporting officials and parents also supported restrictions on alcohol sponsorship of sports clubs.²⁵ Enforcing stricter television advertising and sponsorship regulations are likely to be a popular policy option for reducing alcohol consumption.

Amendment of the *Liquor Act 2007*

The *Liquor Act 2007* should be amended to tighten regulations on advertising and promotion. For example, in Queensland under the *Liquor Act 1992* competitions and any promotions that encourage rapid consumption of alcohol, drinking to excess or intoxication are banned.²⁶ Provisions such as these could strengthen NSW's *Liquor Act*, and may encourage young people to consume less alcohol by reducing the opportunities and incentives for drinking to excess.

Cancer Council NSW recommends:

1. That the Federal Government assumes responsibility for the regulation of alcohol advertising in Australia to reduce the impact of alcohol advertising and promotion on children and young people. The advertising codes should be administered by an independent body with the power to monitor, investigate and penalise breaches of the code. The NSW Government should advocate for the Federal Government to take this approach through its role on the Intergovernmental Committee on Drugs.
2. In the absence of mandatory regulation, the current ABAC code should be strengthened by including the following amendments, to reduce the harms associated with children's exposure to alcohol advertising:
 - a) Expanding the regulations to encompass advertising placement and not just content of the advertisements;
 - b) Expanding the regulation so that it is mandatory for all aspects of the alcohol industry, including independent producers and the retail sector, to comply;
 - c) Abolishing the exception that allows alcohol to be advertised during live sporting events before 9.00pm;
 - d) Introducing regulations to stop the sponsorship of sporting and cultural events popular with children and young people, and amateur sporting clubs who have members or teams that are underage;
 - e) Reviewing the membership of the ABAC Scheme management committee to ensure that members are independent of the alcohol industry;
 - f) Ensuring that any alcohol advertising code includes a clause that relates to the drinking culture, in terms of not allowing advertisements and promotions that normalise frequent and excessive alcohol consumption; and
 - g) Including a minimum of two public health representative on the management committee of the ABAC Scheme.
3. The *Liquor Act 2007* should be amended to ban competitions and any promotions that encourage rapid consumption of alcohol, drinking to excess or intoxication.

b) Alcohol harm minimisation strategies targeted at young people

As young people think of health in relation to being able to lead a desirable lifestyle rather than reducing their risk of long-term health problems,²⁷ improving the drinking culture and continuing to work on preventing people from consuming harmful levels of alcohol should be important components to any harm minimisation strategies implemented.

Cancer Council NSW recommends:

4. The NSW Government should consistently consider the long-term, chronic health issues (such as cancer) associated with high levels of alcohol consumption and not just the short-term, acute harms, when planning harm minimisation programs and education campaigns.

c) Measures to minimise alcohol in the workplace

Workplaces are an important setting for health education and prevention programs. Workplace-based programs to reduce harmful alcohol consumption have the potential to benefit employers, employees and the wider population.²⁸ Implementing workplace-based alcohol education and prevention programs not only benefit workers' health, but they can decrease absenteeism and hence improve productivity.²⁹

There is limited evidence demonstrating workplace programs for alcohol health promotion. However, the upcoming focus on reducing alcohol consumption as part of the Healthy Workers Initiative through the National Partnership Agreement on Preventive Health reinforces this as a government priority. The NSW Government has an opportunity to be leaders in this field by implementing and evaluating primary prevention programs in the work setting. These programs will benefit not only young people, but workers of all ages, their employers and the health system more broadly.

Cancer Council NSW recommends:

5. The NSW Government should introduce primary prevention and education programs delivered through the Healthy Workers Initiative aimed at reducing workers' consumption of alcohol and influencing the drinking culture, and evaluate them comprehensively to build the evidence in this area.

d) Measures to reduce drink driving

No specific comment from Cancer Council NSW.

e) Measures to reduce alcohol-related violence in and around licensed venues

No specific comment from Cancer Council NSW.

f) Measures to address the impact of alcohol on the health system

The misuse of alcohol is a major preventable cause of death and hospitalisation in Australia. The heavy use of alcohol can cause short-term and long-term health problems such as cancer, cirrhosis of the liver, alcohol dependence, stroke, mental health problems, suicide, injuries and motor vehicle accidents. Because alcohol is frequently consumed in excess by young people, it is responsible for many lost years of life.³⁰

It is estimated that about 5% of all cancer cases in Australia, or about 5,070 cancers every year are attributable to long-term alcohol use.¹ High intake of alcohol is also associated with higher blood pressure and death from stroke.⁷ Finally, alcoholic drinks are generally high in kilojoules and low in nutritional value, especially when mixed with sugar-sweetened mixer drinks. If alcohol is consumed in addition to normal dietary intake, weight gain may result. Therefore as well as being directly linked to chronic disease, alcohol may contribute indirectly to the diseases associated with excess body weight, including cancers of the bowel, kidney, pancreas, oesophagus, endometrium and breast (in post-menopausal women).

The financial cost of disease, injury and crime caused by alcohol in Australia has been estimated to be about \$15.3 billion.³¹ Lost productivity in the workplace, health, road accidents and crime make up the majority of these costs.³² This figure is considered to be an underestimate because it was calculated before research confirmed that alcohol also contributes to bowel cancer, the second most common cancer in Australia.^{33;34}

Considering the long-term health conditions and chronic diseases associated with alcohol consumption, it is imperative that governments intending to work on reducing the impact of high levels of alcohol consumption consider not only short-term harms from binge drinking, but also harms associated with long-term consumption of alcohol, even at moderate amounts.

Cancer Council NSW recommends:

6. The NSW Government should broaden the scope of its policy, public education and health promotion in state alcohol plans to include initiatives aimed at reducing the harms associated with long-term consumption of alcohol, in an attempt to reduce the burden of alcohol-related chronic disease in the NSW population. This is important to prevent young people from establishing long-term patterns of high levels of alcohol consumption over their lifespan.

g) Any other related matter

Cancer Council NSW supports a combination of law enforcement, education, and social marketing approaches to reducing alcohol use and influencing the drinking culture of our state, and more broadly of Australia.

Reshaping the drinking culture

It has been suggested that to address the current binge drinking culture in Australia, policy makers should think beyond binge drinking and rather focus on establishing a sensible drinking culture.³⁵ One way to do this is to consider alcohol not simply from a harm minimisation standpoint, but also from a health promotion standpoint. Cancer Council NSW encourages the NSW and Federal Governments to broaden their scope of alcohol prevention to consider the long-term implications of risky alcohol consumption. By framing alcohol in this manner, both the short-term and long-term reductions in consumption can be achieved.

As each Australian state has an influence on national policy through the Council of Australian Governments (COAG),³⁶ the NSW Government should advocate to the Federal Government to not only consider binge drinking as the focus for alcohol prevention, but also a broader, long-term consumption focus.

The *Liquor Act 2007*

The visible enforcement of the *Liquor Act 2007 (NSW)* provisions on supply to minors is another method the NSW Government can contribute to a safer drinking culture. As argued by Geoff Munro of the Australian Drug Foundation:

*“Australian families that try to act in accordance with the NHMRC guidelines have to cope with social structures and customs that place few limits on alcohol supply, marketing and use. They need to be supported with accurate and accessible information, along with legislative and regulatory systems that will help to draw firmer boundaries around the place of alcohol in our society”.*³⁷

As mentioned previously, the *Liquor Act 2007* should be amended to tighten regulations on advertising and promotion, as per the Queensland *Liquor Act 1992*.

Evidence-based solutions to reducing population alcohol consumption

As members of the NAAPA, Cancer Council NSW supports evidence-based solutions to reducing the burden of alcohol-related injury and illness in the NSW population. There are several cost-effective policy options that have not been covered in this submission process that should be considered to influence the drinking culture and curb individuals' frequent and excessive consumption of alcohol. These are outlined below.

Alcohol taxation

Systematic evidence reviews of interventions to reduce harm from adolescent alcohol use have found alcohol taxes and regulations had the strongest evidence of impact.³⁸ The Assessing Cost-Effectiveness in Prevention study, a major study that assessed the cost-effectiveness of various prevention strategies, found increasing alcohol taxes in Australia (including volumetric taxing of alcoholic beverages) would have a substantial health impact and result in cost savings to the government.³⁹ As such, taxation reforms should be included in the range of activities aimed at reducing alcohol consumption and consequently alcohol-related harms and chronic disease.

Restricting the availability of alcohol

There is strong international evidence that policies restricting alcohol availability are both high-impact and effective in reducing alcohol consumption.⁴⁰ A global policy review concluded that the less accessible alcoholic drinks were, the lower the levels of consumption.⁴¹ The NSW Government can assist in restricting the availability of alcohol by limiting the number of new liquor licenses granted, especially in areas already saturated with licenses, implementing trading hour restrictions in liquor licenses and ensuring that community concerns are considered when granting new licenses.

Cancer Council NSW recommends:

7. The NSW Government should advocate for reframing the issue of the binge drinking culture to one of sensible drinking, and as such broaden the standpoint from a harm minimisation issue to a health promotion issue.
8. The NSW Government should advocate for effective policy change at the national level through the Council of Australian Governments and the Intergovernmental Committee on Drugs. Effective policy options for reducing young people's consumption include alcohol taxation reform and restricting the availability of alcohol.

Conclusion

The National Preventative Health Taskforce recommended implementation and enforcement of best-practice alcohol policies as a high priority in reducing the health impacts of alcohol.¹⁹

The NSW Government can influence the health of the people of NSW by implementing statewide measures to reshape the drinking culture, and by being strong advocates for policy change at the national level.

Cancer Council NSW urges the NSW Government to consider the long-term harms associated with high levels of alcohol consumption rather than a sole focus on the short-term harms associated with binge drinking. To positively change the drinking culture, a combination of health promotion (e.g. workplace programs), policy change (e.g. alcohol taxation reform, restrictions on alcohol advertising) and addressing the availability of alcohol (e.g. restrictions on liquor licensing) will be required.

Our community must make it easier for young people to make healthy choices, and enforcing measures to positively influence the drinking culture will reduce alcohol consumption in the long term.

Contact

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