Submission No 39

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

**Organisation**: Brewers Association

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The Director Standing Committee on Social Issues Parliament House Macquarie Street Sydney NSW 2000

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Attention: The Director

The Brewers Association of Australia and New Zealand (Brewers Association) is pleased to provide a submission to the NSW Legislative Council Standing Committee on Social Issues Inquiry into strategies to reduce alcohol abuse among young people in NSW.

Australian members of the Brewers Association comprise Carlton & United Breweries, Coopers and Lion that produce and distribute 95% of beer consumed in Australia.

The Brewers Association has sought to address a number of issues raised in the terms of reference to the Review.

The effect of alcohol advertisements and promotions on young people, including consideration of the need to further restrict alcohol advertising and promotion

The Brewers Association recognises that responsible advertising often requires measures beyond general legal compliance.

Our Australian members are signatories to the Alcohol Beverages Advertising Code (ABAC) Scheme. This code prohibits the inclusion of themes in advertising that may be interpreted by the consumer as a promotion of irresponsible behaviour, whether it is excessive consumption, underage consumption or driving under the influence.

Some views are held which suggest that a ban on the advertising and promotion of alcohol will lead to a reduction in both alcohol misuse and underage drinking. This view presumes there is a direct causal relationship between drinking alcohol and promotion. To date, research findings are inconsistent but, in general, have found either no or minimal effects.

In a mature and diversified market, such as that of beer and alcohol in general, promotion is crucial to encourage competition between brands. Producers of alcohol are solely interested in targeting segments of the market that are lawfully able to purchase alcohol. This approach is consistent with individual efforts to promote brand differentiation and increase market share of their respective category.

Sponsorship is an important avenue for both brand promotion and differentiation. Like other forms of promotion, there is no firm evidence that suggests a ban on sports sponsorship would lead to a reduction in alcohol misuse or underage consumption. The significant expenditure on sponsorship, as highlighted by alarmist critics, is necessary for brand competition. As a matter of fact, the market share of beer and alcohol consumption in general, continues to decline despite increasing costs of sports and event sponsorship.

The Brewers Association has recently submitted a report to the Australian National Preventive Health Agency on alcohol advertising that outlines in some detail consideration of alcohol and advertising. The submission is attached to this correspondence.

## Harm minimisation strategies

When government is seeking to reduce alcohol misuse it should be cognisant that population wide alcohol policies that seek to reduce total consumption in Australia will not reduce misuse, but rather simply impact the majority of consumers who are already drinking in moderation.

Targeted interventions, education programs and cultural change are the key to reducing the irresponsible and harmful consumption of alcohol.

Alcohol policy should be based on establishing a drinking culture that maximises enjoyment and benefits of moderate consumption while tackling the harms caused by alcohol abuse.

The Brewers Association believes that government involvement in relation to alcohol policy should be focused on reducing harmful consumption rather than consumption of alcohol of itself. The focus should be on changing the behaviour of those who misuse alcohol.

Alcohol policy should be based on establishing a drinking culture that maximises enjoyment and benefits of moderate consumption while tackling the harms caused by alcohol abuse. There is a growing body of evidence that targeted interventions that focus on patterns of drinking rather than total consumption are a better means of addressing harmful consumption.

"One of the major conceptual shifts that has occurred in the alcohol field over the past decade has been the recognition (albeit reluctantly in some quarters) of the limitations and inaccuracies inherent within a single-distribution theory of alcohol consumption and all that such a position implies. While it played a valuable part in terms of heightening the profile of prevention issues and fuelling the debate about them, it nonetheless has done prevention a disservice through the long and protracted effort required to shift the focus of attention away from mean per-capita consumption to address more meaningful questions on patterns of consumption, such as occasions of drinking, frequency of episodes of intoxication, drinking setting and other associated factors"

Targeted intervention, including a combination of education, strong enforcement of existing laws and laws to reinforce the social norm of responsible and moderate consumption is far more effective in resolving alcohol misuse without impacting on the majority that consume alcohol in moderation.

## Alcohol related violence

The Brewers Association shares concerns about any violence in our community, including in and around licensed venues. We are of the view that measures to reduce instances of alcohol related violence need to place the responsibility of these acts directly on those who perpetrate them.

As the overwhelming majority of Australians consume alcohol in a responsible manner, any policy that penalises all drinkers simply gives an excuse to the abhorrent behaviour committed by the small minority of alcohol consumers who can be violent.

<sup>&</sup>lt;sup>1</sup> Roche, A.M, and Evans K.R,' Drinking Patterns and their Consequences', 1998

There is a need for stronger enforcement of existing laws that penalise violent offenders and continued education needed to change the attitudes of violence among the Australian community.

Brewers contribute in a variety of ways to assist with education about drinking alcohol. Examples include the industry's significant financial commitment to DrinkWise through to the voluntary introduction of advisory messages on labelling for standard drinks.

## Impact of alcohol on the health system

In regard to the impact of alcohol on the health system, the Brewers Association would like to place on the record our concerns with the use of the Collins and Lapsley figure which claims the total social costs of alcohol in 2004/05 was \$15.3 billion.

A recent critique of the Collins and Lapsley figure by Crampton, Burgess and Taylor<sup>2</sup> (Crampton) has found that the cost of \$15.3 billion per annum is meaningless from an economic and policy perspective and at most only \$3.8 billion per annum is accurate.

As such we would ask the Legislative Council Standing Committee to refrain from relying on the Collins and Lapsley figures regarding the impact of alcohol on the health system.

The Brewers Association is open to providing further information on request.

Yours faithfully

Denita Wawn Chief Executive Officer

 $<sup>^{\</sup>rm 2}$  E Crampton, M Burgess, & B Taylor, 'The Cost of Cost Studies', June 2011

