

**Submission
No 4**

**INQUIRY INTO ALCOHOLIC BEVERAGES ADVERTISING
PROHIBITION BILL 2015**

Organisation: Australian Health Promotion Association (NSW Branch)

Date received: 10 November 2017

Revd the Hon Fred Nile MLC
Committee Chairman
NSW Legislative Council Portfolio Committee No. 1

10 November 2017

Dear Reverend Nile

I refer to the NSW Inquiry into the Alcohol Beverages Advertising Prohibition Bill 2015. The Australian Health Promotion Association (AHPA) has an active interest in measures to prevent or reduce alcohol-related harms such as malicious damage, interpersonal violence, accidental injury, and long-term health impacts.

1. Alcohol Advertising on NSW State Property

A strong association exists between exposure to alcohol advertising, such as television, magazines, outdoor advertising, sports venues and in-store displays, and early initiation of alcohol use and increased consumption in young people¹.

Exposure to alcohol advertising is ubiquitous, with the industry using various platforms to increase sales and consumption, including television, supermarket promotions, public transport stops and the sponsorship of sporting and cultural events. For example, audits of alcohol marketing in Sydney found that 27 per cent of train station advertising was for alcohol products^{2 3}. Whilst the liquor industry may argue that their advertising does not intentionally target the underage population, a growing body of evidence indicates that this vast array of alcohol advertising reaches and influences children and adolescents¹.

The consumption of alcohol is illegal on all metro bus and rail services in NSW. However, this legislation is undermined with alcohol advertising currently permitted on state owned property including buses, trains, bus shelters and train stations (transit advertising); sports stadiums including ANZ Stadium, Allianz Stadium and the Sydney Cricket Ground (SCG), the Royal Randwick Racecourse and Sydney Motor Park; Sydney's Lunar Park as well as various buildings throughout the state.

This oversaturation of alcohol advertising in public areas normalises the problematic drinking culture that exists in NSW and generates an unacceptable level of alcohol-related harm among young people. We therefore strongly recommend that all alcohol advertising be banned from state owned property.

¹ Roche, A.M., Bywood, P.T., Borlagdan, J., Lunnay, B., Freeman, T., Lawton, L., Tovell, A., Nicholas, R., Young People and Alcohol: The Role of Cultural Influences. National Centre for Education and Training on Addiction, Adelaide, 2008

² Jones S.C., Barrie L., Robinson, L., Allsop, S. & Chikritz T. (2012). Point-of-sale promotions in the Perth and Sydney metropolitan areas. *Drug and Alcohol Review* (31):803-808.

³ Kelly B, Flood VM, Bicego C, Yeatman H. Derailing healthy choices: an audit of vending machines at train stations in NSW. *Health Promot J Aust.* 2012; 23:73-75.

2. Alcohol Policy and Regulation

The Alcohol Beverages Advertising Prohibition Bill 2015 prioritises harm minimisation principles rather than industry profits by allocating responsibility to the Ministry of Health. It is essential that this responsibility remains within the Health portfolio.

Excessive alcohol consumption is the leading contributor to the burden of illness and deaths in Australia for people up to 44 years of age, and third overall behind tobacco and high body mass⁴. Economically, it has been estimated that the total societal cost of alcohol misuse in NSW is greater than \$3.87 billion a year⁵. Excessive drinking has been associated with a range of short and long-term harms such as injury, liver disease, cancer, cardiovascular issues, cognitive impairment and mental health problems⁵.

However, regulation and enforcement of the NSW Liquor Act 2007 is currently the responsibility of Liquor and Gaming NSW, which has recently transitioned from the Department of Justice to the Department of Industry. The NSW Liquor and Gaming Strategic Plan 2017-2019 outlines their compliance and regulatory purpose, with a dual function of fostering:

“a diverse and vibrant industry; industry that contributes to and builds social connection and community; industry that enriches NSW cultural and entertainment offering, as well as its attraction as a place people want to live and work and where businesses choose to invest and grow.”⁶

This dual function plainly undermines the ability of Liquor and Gaming NSW to regulate according to the public interest. That is, the commercial needs of the alcohol industry are currently prioritised above public health and safety. With such significant health impacts attributed to the alcohol misuse, the NSW Liquor Act 2007 must prioritise harm minimisation above the interests of the alcohol industry.

This inquiry presents an opportunity to review alcohol policy and regulation more broadly within NSW. It is recommended that the responsibility for all alcohol policy and compliance activities be transferred from Liquor and Gaming NSW to NSW Health.

Recommendations:

- 1. That the advertising of alcohol products and retailers be prohibited on all state owned property.**
- 2. That responsibility for the Alcohol Beverage Advertising Prohibition Bill 2015 and the NSW Liquor Act 2007 align under NSW Health.**

For any queries or follow-up regarding this submission* we can be contacted as per the details below.

⁴ Australian Institute of Health and Welfare. Australian Burden of Disease Study: Impact and causes of illness and deaths in Australia 2011. Cat. No. BOD 4. Canberra (Australia): AIHW, 2016.

⁵ Trends in alcohol use and health-related harms in NSW: Report of the Chief Health Officer 2016. NSW Ministry of Health, 2016.

⁶ Liquor and Gaming NSW Strategic Plan 2017-2019. Liquor and Gaming NSW, 2017



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Yours sincerely

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