

Submission to the Whole of Government Victorian Drug and Alcohol Strategy, Community Consultation, on behalf of Woman's Christian Temperance Union of Victoria, Inc, trading as WCTU Drug-Free Lifestyles.

WCTU is a non-profit, non-denominational women's organisation that has been working in Victoria for nearly 125 years to reduce the harmful impact of alcohol and other drugs on our community.

We commend the Government for making **prevention** of alcohol and drug related harms a key priority of the whole of government Victorian Alcohol and Drug Strategy. (p.10) and adopting the three pillars of the National Preventative Health Taskforce –**demand reduction, supply reduction and harm reduction**. WCTU considers that this is a sensible, three-pronged approach to tackling the many problems of the use of alcohol and other drugs in our community.

With one reservation we therefore also support the government's core objectives for the strategy, to: (p.12)

- Decrease the current rates of alcohol and drug misuse in Victoria.
- Reduce the amount of harm that alcohol and drug misuse causes in the community.
- Provide appropriate access to treatment options so that people with an alcohol or drug problem can get help when they need it.

WCTU has an issue with the use of the **term 'misuse'** in this context. Surely **any use** of illegal drugs is a cost to the community. Any tobacco **use** is harmful and leads to medical costs. Even moderate alcohol use can, and often does, lead to health problems and possible later misuse. So it is **use of drugs, not misuse of drugs** that is responsible for much of the cost of harmful drug and alcohol use in Victoria that has been estimated to be about \$14 billion annually (in 2004-05).

Drug and alcohol policy is a very important and complex matter that has to be tackled on many fronts. However, we would like to limit our comments to the following alcohol issues.

1. Availability of alcohol

Availability of alcohol has long been recognised as a factor in increasing demand and consequently increasing consumption and alcohol-related problems. It is therefore no surprise that the discussion paper points to problems such as:

- Between 1999-2000 and 2006-2007, there was a 49 per cent increase in rates of alcohol related assaults in Victoria²⁴. (p.7)
- Arrests for public drunkenness in Victoria have progressively increased since the year 2000 and have doubled in the last decade to over 20,000 per year.(p.8)
- Between 1999-2000 and 2006-2007, there was a:
 - 47 per cent increase in rates of alcohol-related hospital admissions
 - Over 350 per cent increase in rates of ambulance attendances

This increase in alcohol-related problems corresponds almost exactly to a huge increase in the number of alcohol licences in Victoria. Research by National Drug Research Institute in 2009 found that licensed premises in Victoria increased from 2,000 – 24,000 between 1995 and 2006. It is no wonder that alcohol-related harm has multiplied. This trend continues and must be reversed if the amount of harm caused in the community by alcohol and drug use is to be limited. We urge the Government to reduce the number of outlets by imposing a moratorium on new licences and closing those it can when the licences come up for renewal.

This view is supported by a recent report published in *Addiction* © 2011 Society for the Study of Addiction, of a multi-level study of 2334 adults aged 18–75 years from 49 census collector districts in metropolitan Melbourne, entitled, “**Access to alcohol outlets and harmful alcohol consumption: a multi-level study in Melbourne, Australia**”, by **Anne M. Kavanagh** of The Centre for Women’s Health Gender and Society, School of Population Health, The University of Melbourne, and others. This research concluded that, “**The number of off-premises alcohol outlets in a locality is associated with the level of harmful alcohol consumption in that area. Reducing the number of off-premises alcohol outlets could reduce levels of harmful alcohol consumption.**”¹

2. Alcohol trading hours

It is not only the number of liquor outlets that is a factor. Along with the increase in venues, there has been a great relaxation of **trading hours** so that alcohol can be obtained at almost any hour. There has been a lot of work done in Newcastle to demonstrate the link between availability and alcohol-fuelled assaults. As a result of this study by the University of Newcastle, The National Alliance for Action on Alcohol (NAAA), a coalition of 32 major health and community organisations from across Australia, has called on state and territory governments to unite and support earlier closing times for pubs and clubs.

In response to the Newcastle University study findings, the NAAA is calling for uniform liquor control regulations across Australia, by implementing consistent approaches to policing and enforcement of liquor laws, including:

- *reducing outlet opening times and outlet density across the board, particularly for late-night and other high-risk outlets*
- *introducing accreditation requirements prior to the issuing of a liquor licence*
- *determining the appropriate conditions for new licences such as operating hours, noise restrictions and fees for cost recovery purposes*
- *requiring an annual liquor licence renewal subject to satisfactory compliance.*

NAAA Chair Professor Mike Daube said: “Deregulation around Australia in recent years, means that opening hours have become more relaxed and liquor licenses are generally cheaper, with the exception of Victoria. This is unacceptable considering alcohol related harm costs our community \$36 billion a year.”

(NAAA Media Release September 2010. Full release is in Appendix A)

WCTU fully endorses these recommendations and urges the Victorian Government to implement them as soon as possible.

1. Access to alcohol outlets and harmful alcohol consumption: a multi-level study in Melbourne, Australia by Anne M. Kavanagh¹, Mary T. Kelly², Lauren Krnjacki¹, Lukar Thornton³, Damien Jolley⁴, S. V. Subramanian⁵, Gavin Turrell⁶ & Rebecca J. Bentley¹

The Centre for Women’s Health Gender and Society, School of Population Health, The University of Melbourne, Melbourne, Victoria, Australia,¹ Victorian Public Health Training Scheme, School of Public Health, La Trobe University, Melbourne, Victoria, Australia,² Centre for Physical Activity and Nutrition Research, School of Exercise and Nutrition Sciences, Deakin University, Melbourne, Victoria, Australia,³ School of Public Health and Preventative Medicine, Faculty of Medicine, Nursing and Health Sciences, Monash University, Melbourne, Victoria, Australia,⁴ Department of Society, Human Development and Health, Harvard School of Population Health, Harvard University, Boston, MA, USA⁵ and Faculty of Health, School of Public Health, Queensland University of Technology, Brisbane, Queensland, Australia⁶

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Correspondence to: Anne M. Kavanagh, The Centre for Women’s Health Gender and Society, School of Population Health, The University of Melbourne, Carlton, Melbourne, Vic. 3010, Australia.
E-mail: a.kavanagh@unimelb.edu.au

Submitted 14 October 2010; initial review completed 7 December 2010; final version accepted 18 May 2010

3. Price is another well-known factor in alcohol consumption.

This principle can be clearly seen in regard to the Federal Government's increase in tax on Alcopops.

Apparent consumption of Ready to Drink beverages (RTDs) decreased 1.9% in 2009-10 according to the new figures. This means that there has been a whopping 35.8% drop in alcopop consumption nationwide since the implementation of the alcopops tax in 2008. (Australian Bureau of Statistics report: **Apparent Consumption of Alcohol, Australia, 2009-10.**)

Health Minister Nicola Roxon has signed off on a plan to develop a nationwide minimum floor price for alcohol. The floor price would operate separately from alcohol tax and would make it illegal for any retailer to sell alcohol below a certain price for a standard drink. Setting a minimum floor price won't affect a lot of alcoholic beverages as prices of most drinks, such as beer and spirits, are already above the likely floor price but it does mean (if the plan goes through) that supermarkets will no longer be able to sell cheap cask wine or bottles of wine for \$5.99.

WCTU would favour any measures the State Government is able to take to further raise alcohol prices and so reduce consumption and its harmful effects on the community.

4. Advertising of measures to reduce problem drinking and so change the current alcohol culture is essential.

- WCTU commends the Government for passing the **Secondary Supply legislation** to make it illegal for people to supply alcohol to under-age young people without their parents' permission. This is a valuable tool to empower young people and their parents to say, "No," to alcohol at parties in other people's homes but how many of them know about this law? A well thought-out advertising campaign is needed to promote knowledge and compliance with this law, and breaches should be publicised so that the public realises that the Government is serious about youth drinking. This law can reduce youth drinking but only if it is brought before the public on a regular basis until it is accepted and known.
- Another positive initiative which needs to be advertised regularly in a creative and positive way is the **NHMRC low-risk drinking guidelines**. I do Drug Education programs in schools around Victoria and find that teachers and students are generally ignorant about standard drinks and the NHMRC guidelines
- Good television advertising showing the **health and social problems** caused by alcohol consumption, along the lines of those used regarding cigarettes, would be valuable to alert consumers to the real situation about alcohol-related addiction and health problems.

5. Promotional advertising of alcohol products should be phased out as soon as possible.

Cigarette advertising is a thing of the past because governments had the will to ban it. Alcohol is as costly to the community as cigarettes and should be tackled with the same commitment as cigarettes were.

One of the recommendations of the **Preventative Health Taskforce** asked for “**a staged approach to phase out alcohol promotions from times and placements that have high exposure to young people up to 25 years, including during live sports broadcasts, adolescent and child viewing times and sponsorship of sport.**” Unfortunately, the Federal Government’s response to this was negative, preferring to persist with the current voluntary ABAC Code that works for the benefit of alcohol companies instead of for the health of society. Alcohol advertising of sport, for example must be very worthwhile for sponsors and therefore effective in increasing consumption, as indicated by the amount that is spent (Sunday Age 29/08/09):

- In 2008 the alcohol industry spent more than \$106 million on advertising (not including the internet).
- Fosters spends \$20 million a year sponsoring AFL, NRL and cricket.
- Overall alcohol sponsorship of sport is estimated at \$60 to \$90 million a year.

Newspaper and junk mail advertising of alcohol should also be banned. Prior to Fathers’ Day, newspapers had page after page of alcohol advertisements that implied that Father needed and would appreciate nothing better than a bottle of wine, etc. and that it is a normal and indispensable part of life.

Much alcohol advertising is more subtle, as radio presenters in particular, imply in interviews or when reporting sporting achievements, that winners will be celebrating with champagne or a ‘big night out’. We believe that commentators need to be educated about the effects of alcohol and their influence on young listeners and this is a practice that should be stopped.

6. Young people and alcohol

The emphasis in the Consultation Paper on “Preventing the uptake and/or delaying the onset of use of drugs and reducing the misuse and early use of alcohol and drugs in the Community” is to be commended.

Recent research that shows that the brain is not fully matured until a person is in their early twenties and that alcohol damages teenage brains more than adult brains, is motivation for trying to delay or prevent young people from drinking. The younger a person is when they start to drink, the greater the likelihood of them becoming addicted and suffering health problems.

- Raising the legal drinking age to 20 or 21 as it is in the USA where youth drinking is much less of a problem than in Australia should be seriously considered although it would be difficult.

- There has been a theory that it is best for **parents** to introduce their children to alcohol in their teens while in the home. However, a study published in the May 2011 issue of the *Journal of Studies on Alcohol and Drugs*, entitled, “**Adult Supervision Doesn’t Make Teen Drinking Safe**”, shows that adult supervision of teen drinking, referred to as “harm minimization,” actually leads to more alcohol-related problems, not less. (See article in Appendix B)

Another article, “**How to reduce alcohol consumption among young people**” (**Voxy News Engine**) Monday, 27 September, 2010 - 07:50, also looks at the important role of parents in not normalising the use of alcohol in the home. (Appendix C)

- **Sport** should be a healthy activity for young people but, unfortunately, many sporting clubs have a culture of heavy drinking and rely on revenue from alcohol sales and poker machines. This sends a destructive message to the children in their teams and it is not unusual to hear of under-age boys being given bottles of alcohol as awards for their sporting achievements. This culture must be changed. The Australian Drug Foundation's "**Good Sports Program**" is an important initiative to help clubs to be more responsible and move to a less boozy model. Perhaps the Government could give financial incentives to clubs that adopt the Good Sports model or similar ways of reducing alcohol consumption and promotion.

- An initiative of the previous government to encourage alcohol-free events for youth was its "**Freeza**" awards that gave grants to some youth groups that sponsored alcohol-free programs. If this is not still in effect, we recommend that it be reinstated and preferably expanded to give more opportunity and funding for healthy activities run by youth.

- **School Drug Education programs** have become a normal part of the curriculum and play a part in giving information and shaping the values of students. However, in many cases, the emphasis is on harm minimisation – how to drink responsibly because everyone will do it – rather than on harm prevention that gives good information so that students can resist peer pressure in an informed way and, hopefully, decide not to drink or to drink very moderately.

- **Students need good role models** to look up to and show them that alcohol is not necessary for a happy, good and fulfilling life. In fact, by abstaining from alcohol and other drugs they are giving themselves the best opportunity to make a positive contribution to the community as they mature. There must be young achievers in our society, who do not drink, who could be encouraged to be involved in creative, inspiring television, promoting an alcohol and drug-free life. This is necessary if culture change is to be achieved. Incidentally, we commend the Premier, Ted Baillieu, for his teetotal stand.

As the Consultation Paper points out, a number of previous reviews and recommendations have touched on alcohol and drug demand, supply and harm. These have included Parliamentary Inquiries and the work of the National Preventative Health Taskforce and all have recognised the problems that our society is facing and their discussion papers have been encouraging. Sadly, all the consultation seems not to have resulted in much action. The WCTU of Victoria hopes that this consultation will lead to some positive action to change our drinking culture and reduce the alcohol-related problems in society.

Anne Bergen, BA Dip Ed
 Education Director
 Woman's Christian Temperance Union of Victoria, Inc.

See Appendix next page.

Appendix A

MEDIA RELEASE

16 September 2010

PUBS AND CLUBS MUST CLOSE EARLIER TO REDUCE ASSAULTS

New study shows small changes to opening hours result in large reductions in harm

The National Alliance for Action on Alcohol (NAAA), a coalition of 32 major health and community organisations from across Australia, is today calling on state and territory governments to unite and support earlier closing times for pubs and clubs.

The call follows results from a University of Newcastle study that proves this is an effective method to reduce alcohol-related assaults, published in the international scientific journal *Addiction* today.

Associate Professor Kypros Kypri found the 2008 restriction to 3.30am closing times and a 1.30am lockout for 14 pubs and clubs in Newcastle resulted in a 37 per cent reduction in assaults.

Assaults in the Newcastle CBD fell from an average 33 to 22 per month while the restrictions were in place, and did not change significantly in a neighbouring suburb where earlier closing times were not imposed by the state government.

Furthermore, 27 per cent of assaults occurred after 3am in the CBD before the intervention. This decreased to 12 per cent after the earlier closing times were in place and there was no increase in assaults earlier in the evening.

In response to these findings, the NAAA is calling for uniform liquor control regulations across Australia, by implementing consistent approaches to policing and enforcement of liquor laws, including:

- reducing outlet opening times and outlet density across the board, particularly for late-night and other high-risk outlets
- introducing accreditation requirements prior to the issuing of a liquor licence
- determining the appropriate conditions for new licences such as operating hours, noise restrictions and fees for cost recovery purposes
- requiring an annual liquor licence renewal subject to satisfactory compliance.

NAAA Chair Professor Mike Daube said: "Deregulation around Australia in recent years means that opening hours have become more relaxed and liquor licenses are generally cheaper, with the exception of Victoria. This is unacceptable considering alcohol related harm costs our community \$36 billion a year.

"As well as governments getting serious about this issue, industry must commit to finding the balance between commercial interests and community concerns about safety and the harms of binge drinking."

Australian Drug Foundation CEO John Rogerson said: "Last weekend's national Operation Unite police blitz resulted in 2,432 arrests relating to alcohol-fuelled crime and anti-social behaviour, 320 for assault. For a sustainable drop in violence after the police blitz, outlets will need to close earlier."

VicHealth CEO and NAAA Co-Chair Todd Harper added: "Importantly, this research builds on international evidence that restricting bottle shop trading hours is also an effective deterrent for alcohol abuse, particularly among young people. We hope that Australian governments seriously consider enforcing earlier closing times as a first step to reduce the many problems excessive alcohol use causes every weekend, in every town and city."

AVAILABLE FOR COMMENT:

Todd Harper (VicHealth) 0417 561 412 / Prof. Mike Daube (PHAA) 0409 933 933 / John Rogerson (ADF) 0430 948 380

NOTES TO EDITORS

*As of September 2010, the **National Alliance for Action on Alcohol** consists of 32 organisations from across Australia:*

Alcohol and Other Drugs Council of Australia (ADCA), Alcohol Education and Rehabilitation Foundation (AERF), Alcohol Policy Coalition (Vic), Anglicare Australia, Australian Drug Foundation (ADF), Australasian Faculty of Public Health Medicine (AFPHEM), Australian Medical Association, Australian Health Promotion Association (AHPA), Australian National Council on Drugs (ANCD), Australian Research Alliance for Children and Youth (ARACY), Cancer Council Australia, Cancer Council Victoria, Diabetes Australia, DRUG ARM Australasia, Kidney Health Australia, National Drug & Alcohol Research Centre (NDARC), National Drug Research Institute (NDRI, Curtin University), National Heart Foundation, National Indigenous Drug and Alcohol Committee (NIDAC), Public Health Advocacy Institute (WA), Public Health Association of Australia (PHAA), Royal Australasian College of Physicians, Ted Noffs Foundation, Telethon Institute for Child Health Research, Turning Point Alcohol & Drug Centre, Uniting Church, VicHealth and university groups.

Appendix B

FACE - June 7, 2011

<http://freshstory.org/blogs/freshstory.php?p=142&more=1&c=1&tb=1&pb=1#more142>

Another Study Shows Adult Supervision Doesn't Make Teen Drinking Safe - 05/31/11

As we have reported in previous issues of *The Fresh Story*, new studies show that adult supervision of teen drinking – referred to as "harm minimization," actually leads to more alcohol-related problems, not less.

The latest study was published in the May 2011 issue of the *Journal of Studies on Alcohol and Drugs*. The study was conducted by a team of American and Australian researchers from the University of Minnesota, the Social Development Research group in Seattle, Washington, and the Centre for Adolescent Health in Melbourne, Australia. The study followed more than 1,900 teens in Washington state and Victoria, Australia, for a two-year period from seventh to ninth grade. During that time, participants answered questions from researchers regarding how often they drank with adults as well as their total alcohol use and alcohol-related problems.

Researchers found that by the time participants reached eighth grade, 67 percent of Australian teens and 35 percent of American teens had consumed alcohol under adult supervision. Once the participants reached ninth grade, 36 percent of Australian teens and 21 percent of American teens had experienced

significant alcohol-related problems such as binge drinking, blackouts, and fights. Whether they were from Australia or America, teens who drank with adults were more likely to drink, period. And, they were more likely to experience harmful alcohol-related consequences by the time they reached ninth grade.

Given their findings, researchers who conducted this study recommend a "no-use" policy for underage youth. Lead researcher Barbara McMorris, Ph.D. of the University of Minnesota said, "Kids need black-and-white messages early on. Such messages will help reinforce limits as teens get older and opportunities to drink increase."

This study is consistent with a growing body of research that shows "harm minimization" is a myth. Adult-supervised drinking doesn't translate into responsible drinking among teens. No amount of drinking is responsible or safe for underage youth.

Sources:

"Adult-supervised drinking in teens may lead to more alcohol use," *EmaxHealth.com*, April 28, 2011.

"You're not doing your teen any favors by letting them drink," *BusinessWeek.com*, April 29, 2011.

Appendix C

How to reduce alcohol consumption among young people (Voxy News Engine)

Monday, 27 September, 2010 - 07:50



Research just published in the Australian and New Zealand Journal of Psychiatry shows there are six things that parents can do to reduce the risk of alcohol related harm in their children. These include: - not getting intoxicated in front of them; - not supplying them with alcohol;

And four further general parenting strategies directed at their children: - expressing warmth and affection - maintaining positive communication - monitoring their activities and who their friends are - instituting consequences for wayward behaviour.

"One of the key issues coming out of this research is the lack of any evidence showing that normalising the use of alcohol is a good prevention strategy" says Professor Doug Sellman of the University of Otago, Christchurch, who was invited to write an accompanying commentary.

"In fact the opposite is the case. The less alcohol is normalised in family life, and particularly when parents avoid being at all intoxicated in front of their children or supplying them with alcohol, the better the prevention of alcohol problems in young people will be" he says.

There is an obvious parallel to this for society at large, where the Government, on behalf of all of us has a responsibility to lead the reduction of alcohol-related harm across the population"

"There are clear evidence-based measures based around pricing, accessibility and advertising that the Government could institute to reinstate the idea that alcohol is not an ordinary commodity and that heavy drinking is not normal" says Professor Jennie Connor, Head of Preventive and Social Medicine at the University of Otago, Dunedin.

"Normalisation was one of the great selling points of the 1989 alcohol reforms, which opened the flood gates for supermarket sales and ubiquitous cheap alcohol supply. This has turned out to be a mistake and needs to be turned around".