

Submission from

The Australian Catholic Bishops Conference

To

Senate Community Affairs Committee's

Inquiry regarding

Alcohol Toll Reduction Bill 2007

March 2008

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1. Thank you for the opportunity to make a submission to the Senate Community Affairs Committee (Committee) about the Alcohol Toll Reduction Bill 2007 (Bill).
2. Alcohol has been used in many different societies for thousands of years. When used properly it is an enjoyable component of society. But when used improperly, it has many serious adverse consequences. How a modern complex society such as Australia balances the proper and improper uses of alcohol is a difficult challenge that cannot be ignored. The Bill being considered by the Committee proposes one means of limiting the alcohol toll.
3. The objective of the Bill is for “an Act to create a culture of responsible drinking, and to facilitate a reduction in the alcohol toll resulting from excessive alcohol consumption, and for related purposes”. Reasonable people support such an objective.
4. Most people drink responsibly and will not be adversely affected by the promotion of a culture of responsible drinking. On the other hand there is an urgent need for a reduction in the alcohol toll resulting from excessive alcohol consumption. The social and personal costs resulting from excessive alcohol consumption are well known and include:
 - Domestic violence,
 - Public order and sexual violence,
 - Significant community disintegration, especially in some remote communities,
 - Long term serious health problems for heavy drinkers,
 - Serious related problems such as fetal alcohol syndrome,
 - Road Toll.

5. Some initiatives have been taken to reduce the social and personal costs of excessive alcohol consumption but much more needs to be done. Initiatives, such as Random Breath Testing (RBT), have had an impact. Responsible drinkers accept the inconvenience of initiatives such as RBT for the benefit of society in general.
6. The Catholic Church has an extensive network of health and social welfare services. Workers in these services report that they are very familiar with the (sometimes devastating) effects of excessive alcohol consumption, especially binge drinking.
7. For example, Dr Alex Wodak, Director of Drug and Alcohol Services at St Vincent's Hospital, Sydney says that most of the alcohol consumed in the community is consumed at "high risk". Dr Wodak says "It's hard to improve the outlook without alcohol consumption falling. We know an enormous amount about what works and what doesn't work for alcohol.It's really a political problem". "Alcohol is a huge issue – a huge public health issue, a huge social issue and a huge economic issue".
8. There is no single solution to the problems of excessive alcohol consumption. Other initiatives, such as those recently announced by the Prime Minister, Mr Rudd, will complement the initiatives proposed in this Bill but are not a substitute. If society is to seriously address the problems caused by binge drinking and other abuse of alcohol by young people, then society must accept that a number of significant controls must be imposed. Tokenism is not sufficient.
9. The Bill seeks to address a very serious and unacceptable problem, ie excessive alcohol consumption, especially binge drinking, by young and underage people. As noted, it will not completely solve this problem but, together with other initiatives such as increased taxation in order to increase price, regulation of points of sale and improved community education, it will contribute towards a solution.
10. The Bill proposes three initiatives:
 - Limit targeting of alcohol advertising at young people especially children,
 - Prohibiting advertising that links drinking with success (personal, business, social, sporting or sexual etc) and
 - Bringing alcohol packaging into line with other legal drugs by requiring health information on alcohol products.
11. Each of these initiatives is reasonable and will not adversely affect responsible drinkers.
12. Anecdotal information from the Church's network of health and welfare services is unequivocal that young people are especially at risk of and

from excessive drinking. Binge drinking among young people is a particular problem.

13. Alcohol advertising targeting young people is unconscionable. Alcohol is an adult product and any advertising of alcohol should be targeted at adults. The proposal to limit alcohol advertising on television and radio to after 9pm is in line with comparable limits on advertising of other adult products.
14. Advertising that suggests that success (personal, social, sporting, sexual etc) is linked with alcohol consumption is deceptive and misleading. Even allowing for a degree of exaggeration in advertising, linking success with alcohol is unacceptable.
15. Other legal drugs carry health information on packaging. At one extreme, medicines that are beneficial carry a variety of information, especially regarding the adverse effects of abuse. At the other extreme, tobacco products that are detrimental carry a variety of warnings about the harmful impacts of smoking (there are also considerable limits upon tobacco advertising). In the middle is alcohol which can be beneficial if used properly and detrimental if abused. If drugs that are beneficial and drugs that are detrimental both carry health information on packaging, then it is reasonable that a drug that can be either beneficial or detrimental should also carry health information on packaging.
16. The Bill proposes amendments to the Food Standards Australia New Zealand Act 1991 (FSANZ) in order require health information on all alcohol products. The objects (S3) of the FSANZ include:

“The object of this Act is to ensure a high standard of public health protection.....to achieve the following goals.....(c) the provision of adequate information relating to food to enable consumers to make informed choices”.

The amendments proposed by the Bill are consistent with this object.
17. The purpose of alcohol advertising is to increase sales and thus profit. Sales increase when either the number of customers increases or consumption by existing customers increases.
18. The number of customers can be increased either by attracting new customers into the market, ie non-drinkers, or by attracting customers from other brands. Non-drinkers can either be adults or young people. Targeting adults with honest advertisements to try one’s product is an acceptable part of modern commerce. Similarly seeking to attract customers to transfer from a competitor’s product is acceptable providing the advertising is honest. Targeting young people to commence alcohol consumption is unacceptable. Consuming alcohol is an adult activity and deciding to consume alcohol should be an adult decision. Accordingly, the Bill’s proposal to limit alcohol advertising to adult viewing times is reasonable.

19. Advertising that seeks to increase consumption by existing customers is acceptable providing customers are not encouraged to increase their consumption beyond reasonable limits. Medical advice indicates that consumption of alcohol by adult men and women should be very modest. If an existing customer is already consuming a modest volume of an advertiser's product, then there is very little latitude for an increase in consumption before one moves beyond modest to excessive consumption. Accordingly it is reasonable to conclude that alcohol advertising that seeks to increase consumption by existing customers is generally seeking to encourage excessive alcohol consumption. If such advertising is targeting young people then it is immoral.
20. If alcohol advertising seeks either to increase the number of customers or to increase consumption by existing customers, such advertising is unacceptable if young people are one of the targets of the advertising. Accordingly, the Bill's proposal to limit alcohol to adult viewing times is reasonable.
21. The initiatives proposed in the Bill are a good first step towards addressing a serious problem in our society. Much more needs to be done. These initiatives alone will not solve the problem but they will help to ameliorate it. They will not adversely affect adults who consume alcohol in a responsible way. They are a good first step and should be supported.
22. The opportunity to make a submission to the Committee about this important Bill is appreciated. If Committee members wish to discuss any of these matters further, personnel will be available to do so.

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