

9 March 2017

Senator David Leyonhjelm
Chair, Red Tape Committee
Department of the Senate
PO Box 6100
Canberra ACT 2600

Email: redtape.sen@aph.gov.au

Dear Senator Leyonhjelm,

Response to Questions on Notice - Senate Red Tape Committee

Thank you for offering the Royal Australasian College of Surgeons an opportunity to provide evidence as part of the Senate's inquiry into the effect of red tape on the sale, supply and taxation of alcohol on Friday 24 February 2017.

During the hearing we were asked to clarify some points as listed below. Thank you for this further opportunity to provide input to the inquiry.

Reference for statement made that 75% of the alcohol is consumed by 20% of drinkers

Livingston M. Understanding recent trends in Australian alcohol consumption. Canberra: Foundation for Alcohol Research and Education; 2015 Jul. Available from: www.fare.org.au.

Reference for statement made about the correlation between alcohol outlet density and incidence of trauma and domestic violence in surrounding areas

Morrison C, Smith K. Disaggregating relationships between off-premise alcohol outlets and trauma. Canberra: Foundation for Alcohol Research and Education; 2015 May. Available from: www.fare.org.au.

We would also like to highlight the following additional references which substantiate our position that the greater the physical availability of alcohol (hours and outlets), the greater the resulting harm.

- Morrison C, Smith K, Gruenewald PJ, Ponicki WR, Lee JP, Cameron P. Relating off-premises alcohol outlet density to intentional and unintentional injuries. *Addiction*. 2015 Oct 9;111(1):56–64. Available from: <http://onlinelibrary.wiley.com/doi/10.1111/add.13098/abstract>.
This research from Melbourne showed that greater off-premises outlet density was related to greater incidence of traumatic injury, and chain outlets appear to contribute most substantially to traumatic injury risk.
- Donnelly N, Menendez P, Mahoney N. The effect of liquor licence concentrations in local areas on rates of assault in New South Wales. Sydney: NSW Bureau of Crime Statistics and Research; 2014 Dec. Available from: <http://www.bocsar.nsw.gov.au/Documents/CJB/CJB181.pdf>

This paper concluded that regulatory authorities should be concerned about increases in liquor outlet density. It found that the concentration of hotel licences in a local government area, particularly at higher density levels, was strongly predictive of both domestic violence and non-domestic violence assault rates. A similar, but slightly weaker, association was found for the concentration of packaged licences.

- Livingston M. A longitudinal analysis of alcohol outlet density and domestic violence. *Addiction*. 2011 Feb 14;106(5):919–25. Available from: <http://onlinelibrary.wiley.com/doi/10.1111/j.1360-0443.2010.03333.x/abstract>.

This research showed that in Melbourne, the density of liquor licences was positively associated with rates of domestic violence over time. The effects were particularly large for packaged liquor outlets, suggesting a need for licensing policies that pay more attention to off-premise alcohol availability.

Reference to South Australian statistics

During the hearing you stated that South Australia has the highest number of alcohol outlets per head of population but the lowest incidence of alcohol related problems. We would be grateful if you could produce the evidence supporting this statement.

The South Australian Government's [Alcohol and Other Drug Strategy 2011-2016](#) indicates that the Government considers harms associated with the consumption of alcohol are still having a substantial impact on individuals, families, communities and community services such as police, emergency and health services.

This is supported by [2013 data](#) from SA Health and the state's Drug & Alcohol Services which show that South Australians aged 14 and over have a slightly higher risk of alcohol-related disease or injury over a lifetime compared to the national average (noting the limitations of the data). This is also the case for risk of alcohol-related injury from a single occasion of drinking.

The RACS South Australian Committee has previously written to the Government concerning the lack of data on alcohol-related harm across the state, and we invite you to [view the submission](#).

Thank you again for the opportunity to provide input into this inquiry.

Sincerely,

Mr Anthony Grabs, FRACS
Trauma surgeon
Royal Australasian College of Surgeons

John A Crozier AM CSM, FRACS
Chair, Trauma Committee
Royal Australasian College of Surgeons

cc Mr Raffi Qasabian, Chair, NSW Committee, RACS
 Mr David Walters, Chair, SA Committee, RACS
 Mr John Biviano, Acting CEO, RACS
 Ms Rebecca Clancy, Acting Director, Fellowship & Standards, RACS
 Mrs Deborah Jenkins, Director, Relationships & Advocacy, RACS