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Ms Sophie Dunstone
Committee Secretary
Senate Legal and Constitutional Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600
alcohol.violence.sen@aph.gov.au

Dear Ms Dunstone,

Dalgarno Institute SUBMISSION TO INQUIRY INTO THE NEED FOR A NATIONALLY CONSISTENT APPROACH TO ALCOHOL-FUELLED VIOLENCE

We value this important opportunity to provide a submission to the Senate Inquiry on the need for nationally consistent approach to alcohol-fuelled violence.

As long standing advocates for legislative and cultural change around the misuse of alcohol and its inevitable negative outcomes, we are adamantly in favour of a comprehensive and nationally coordinated response to alcohol-related violence.

However, to achieve meaningful and sustained change, The Dalgarno Institute's long history of involvement in previous positive changes to culture and legislation, and much to our chagrin, reversal or sabotaging of community and family benefiting changes to alcohol culture, full comprehend (from said experience) that interventions to reduce alcohol-related violence must be part of a comprehensive and coordinated approach to tackling alcohol-related harms across the board. Of course, key to this is a robust scrutiny that addresses the predicative elements that precipitate these harms.

To negate much of the cognitive dissonance, and often ineffectiveness in current eclectic state legislations that continue to be circumvented by the industry, the need for national leadership and a comprehensive approach is clear. The evidence around the issues of consumption of alcohol and violence^{1,2,3,4,5}, is unmistakably clear, and the impact of alcohol-fuelled violence on individuals, families, communities and front-line services across Australia is profound.

Studies have shown that approximately 47 per cent of all perpetrators and 43 per cent of all victims are intoxicated prior to an assault.^{6,7} Alcohol is involved in one in three non-domestic homicides⁸ and is implicated in an overwhelming majority of "king-hit" or single-punch assault fatalities.⁹ Alcohol-related assaults, however, are not confined the streets. Alcohol is estimated to be involved in up to half of partner violence incidents in Australia, and 73 per cent of partner physical assaults.¹⁰ Empirical evidence further indicates an association between abusers' drinking and the frequency and severity of their violence.^{11,12}

Beyond the disturbing and 'must change' realities of alcohol fuelled violence and abuse, other concerning trends must change.

Alcohol exacts a devastating toll on the health, productivity and safety of communities, and imposes a substantial burden on emergency services, health systems and law enforcement. Alcohol is second only to tobacco as a leading preventable cause of death and hospitalisations across Australia¹³, and is associated with over 200 health conditions, including different types of



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cancer, cardiovascular disease, liver cirrhosis and mental health conditions, in addition to pregnancy complications such as miscarriages, birth defects and Fetal Alcohol Spectrum Disorder (FASD).^{14,15,16} It also contributes to a range of social harms including vandalism, road traffic accidents, child maltreatment and neglect, lost productivity and costs to service systems including the criminal justice, welfare, child protection and health systems.¹⁷

When the full range of private and social costs place are considered, the estimated annual cost of alcohol-related harms is \$36 billion.¹⁷ Conservative estimates of the short-term and direct external costs suggest that the total costs of alcohol harms in Australia exceed \$15 billion per year.¹⁸

Given the significant costs of alcohol, developing and implementing a comprehensive and coordinated policy response is imperative. Several key considerations must guide the development of nationally consistent and coordinated response to reducing such harms. First, it is imperative that policies are adopted that are grounded in evidence and that address the underlying, systemic drivers of alcohol-related harms. Strategies that address the effects of alcohol-related crimes and other harms, without addressing the underlying causes of such harm, are unlikely to result in sustainable and meaningful change.

In addition, targeted interventions that focus on ‘problem drinkers’ are insufficient and less effective than population-wide measures in reducing the immense health, social and economic toll of alcohol.^{*,19} Policy efforts must therefore focus on preventing harms and tackling the underlying drivers of alcohol-related harm, with an emphasis on addressing systemic and population-level factors.

From this perspective, alcohol-related crime and violence should not be defined as solely a law and order or policing problem that can be solved by more police resources or harsher sentencing. There is no convincing evidence, for example, that imposing punitive or mandatory sentencing on alcohol-related crime is an effective deterrent.^{20,21,22,23} There is scope, however, to improve the role of police in enforcing liquor licensing legislation, and this can play a role in reducing alcohol harms when implemented alongside alcohol supply and demand reduction measures. Police not only spend substantial time responding to alcohol-related matters, but are also involved in enforcing liquor licensing legislation, and it is critical police and other regulatory bodies have strong legislative frameworks to allow them to act on venues that breach liquor licensing laws. Various deficiencies in legislation, the liquor licensing process, and the governance arrangements for liquor licensing constrain their capacity to effectively enforce liquor licensing legislation and influence liquor licensing decisions.²⁴

An effective national approach to alcohol harms must be comprehensive and multi-faceted. International scientific evidence²⁵, the World Health Organization²⁶, and Australia’s own national drug strategy²⁷ all concur that there is no single intervention or ‘magic bullet’ that can decisively tackle the harms from alcohol: alcohol harms are comprehensive and extensive and in turn require a comprehensive, extensive and long-term response. This multi-faceted response should include a whole-of-government approach, involving the health, justice, education and other portfolios, as well as central coordination and leadership. The most recent alcohol policy scorecard of Australian governments highlights that, at a national level, there is critical gap in this area, owing to the lack of a national

* Although the heaviest drinkers have a higher risk of a range of alcohol-related harms, this group is not responsible for the bulk of aggregate harms and the associated economic costs related to alcohol use. Rather, the majority of the population – drinkers who occasionally drink heavily but whose overall volume of drinking is moderate – are responsible for the majority of harm, particularly harms related to intoxication, because there are so many more of them. This is commonly referred to as the ‘prevention paradox’. Interventions that address the whole population therefore have a greater impact on the overall burden of alcohol-related harms than interventions that exclusively target the heaviest drinkers.



alcohol strategy for Australia since 2011.²⁸ There are major variations in policy approaches at the state and territory level, with significant inconsistencies in liquor licensing, secondary supply laws, data collection, and education strategies. Some states and territories lack an overarching alcohol policy plan with any detailed action, and others focus exclusively on the justice or licensing aspects and do not address health. There are very few instances where a comprehensive suite of policies and programs has been implemented in a coordinated fashion, and none at a national level.

A substantial body of research from Australia and elsewhere provides clear direction as to the most effective interventions are required to reduce the harm from alcohol.^{29,30,31,32} This includes:

- ***Increasing the price of alcohol through taxation and minimum pricing***
Alcohol taxation is one of the most effective policy interventions to reduce the level of alcohol consumption and related problems.^{33,34,35} Alcohol taxation is effective because it not only reduces consumption and related harms, but also provides revenue to offset the direct financial burdens of alcohol harms on government services.
Alcohol taxation is the responsibility of the Commonwealth, although state and territory governments can play a role in regulating price discounts and promotions. Over the past decade, numerous government reviews and reports have consistently highlighted flaws and inconsistencies in the current alcohol tax system, and have shown that significant health gains and cost savings could be achieved with a volumetric taxation system, whereby all alcohol products are taxed according to their alcohol content. The Federal Government has failed to act on these recommendations, despite widespread support for volumetric taxation from health experts, community groups and economists.
- ***Reducing the availability of alcohol***
Restricting the physical availability of alcohol is central to preventing alcohol-fuelled violence and other harms, and is affected by policies on trading hours, the density of liquor outlets, and the type and size of places in which alcohol is sold.³⁶ There is a substantial body of evidence demonstrating that the physical availability of alcohol impacts on overall consumption levels, patterns of drinking, and the incidence of violence and other social and health harms.^{37,38,39,40,41,42,43} Although state and territory governments have primary responsibility for regulating the physical availability of alcohol through liquor licensing laws, the Commonwealth plays a role in shaping the overarching context for such laws under the National Competition Policy (NCP). The NCP has contributed to the liberalisation of liquor licensing in Australia, resulting in a dramatic increase in the number and type of alcohol outlets and their trading hours.
- ***Restricting alcohol marketing, promotions and sponsorship***
While the Commonwealth is responsible for regulating most aspects of alcohol marketing, state and territory governments can regulate aspects of advertising, pricing promotions and point-of-sale promotions through liquor licensing legislation and restrictions on advertising in public spaces and on state-owned assets such as public transport.
- ***Increasing the Minimum Legal Drinking Age (MLDA) Or Purchase Age***
The international evidence for, and Australian Community sentiment around, this policy driver sees a very useful tool for delaying uptake of alcohol, reducing negative impact on school completion, learning outcomes, reducing teen violence, unplanned pregnancies and FASD potential in the young demographic, just to mention a few. More data can be found at www.21bethere.org.au

Although responsibility for these various aspects of alcohol policy is shared across different levels of government, it is vital there is national leadership and commitment to drive a more coordinated and



effective response. The Commonwealth Government can and must make a distinctive contribution in setting national targets for reducing harm, funding major initiatives, supporting consistent data collection and tracking outcomes, sponsoring research and evaluation, and coordinating action among jurisdictions. While work has commenced on developing a new national alcohol strategy under the auspice of the Intergovernmental Committee on Drugs (IGCD),⁴⁴ there has been no national alcohol strategy in Australia since 2011. In addition, since the abolition of the Ministerial Council for Drug Strategy (MCDS) in 2011, there has been no formal governance mechanism to drive a national approach. The MCDS provided a unique forum for developing and coordinating policies across jurisdictions, enabling both health and justice ministers to come together. Since the Federal Government closed the Australian National Preventative Health Agency (ANPHA), there has also been no central agency responsible for delivering key national alcohol prevention initiatives.⁴⁵

Clear governance arrangements are required to support a national alcohol strategy and oversee its implementation. The absence of effective governance arrangements and processes weakens strategic efforts, making it difficult to clarify responsibilities and set clear objectives, tasks and milestones.

The lack of governance arrangements and coordinating policy infrastructure also undermines a more consistent approach to areas that fall under the responsibility of state and territory governments. For instance, there is a lack of cohesive policy guidance and infrastructure to support a more evidence-based approach on regulating alcohol outlet density and opening hours. There is a need for national guidelines outlining how these issues should be considered in planning and liquor licensing decision making, and defining levels of risk related to outlets densities that can be used to control laws in each jurisdiction. Liquor licensing legislation can be a powerful tool in reducing alcohol-related harm and alcohol-related crime, but its effectiveness can also be constrained by legislative imprecision and limited enforcement practices.

Similarly, there are inconsistencies and a lack of compliance and accountability mechanisms to ensure Responsible Service of Alcohol (RSA) requirements are effectively applied across jurisdictions. In Australia, persons involved in the sale or service of alcohol in licensed premises are required to complete RSA training. However, this training is only useful if it is applied fully and consistently by staff.⁴⁶ Without appropriate enforcement mechanisms, RSA measures have limited impact on the behaviour of people working in licensed venues and do not reduce alcohol-related harms.⁴⁷ A recent observational study of licensed premises across five Australian cities found that 85 per cent of patrons who were intoxicated were still being served alcohol.⁴⁸ This underscores the need to strengthen the operation of RSA and ensure that is backed up with compliance and accountability mechanisms across jurisdictions.

Nationally consistent and comprehensive data collection is also vital to support a coordinated and effective approach. Accurate and timely data is critical for informing the development and evaluation of strong, evidence-based alcohol policy. Currently, however, alcohol data collection is ad hoc and incomplete, with considerable variation between jurisdictions.⁴⁹ Wholesale sales data provides the most accurate and efficient data collection on consumption levels, yet it is not routinely collected in Australia. While several jurisdictions collect alcohol sales data under the National Alcohol Sales Data Project (NASDP), variation in the type of data reported and the absence of Victorian, South Australian and Tasmanian data ultimately prevents a nationally consistent approach. A greater focus is needed to address current gaps and support the systematic and consistent collection of alcohol-related data across jurisdictions, covering not only alcohol sales but also hospital presentations and admissions, and alcohol-related crime data. To achieve these objectives, the Commonwealth must improve infrastructure and data collection and reporting systems.

In addition to strengthening governance arrangements and the infrastructure for coordinating policy development and data collection, an effective and coordinated approach across different levels of



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government will only be achieved if policy formulation is insulated from alcohol industry influence. Industry influence precludes robust policy approaches and ultimately undermines efforts to protect public health and safety. The inclusion of industry representatives as equal partners in the policy process has been evident in the IGCD planning for the next alcohol strategy. It is also evident in ineffectual and industry-led advertising regulations, as well as in the development and implementation of liquor licensing legislation, which frequently prioritises commercial interests over public health and safety. A comprehensive set of guidelines or code of conduct should be developed around the role of the alcohol industry in the formulation of alcohol policy. Governments must be able to act in the interests of public health and safety, without inference from vested interests. Accordingly, Australian Governments should adopt the World Health Organization's position that "the alcohol industry has no role in the formulation of alcohol policies, which must be protected from distortion by commercial or vested interests".⁵⁰

Finally, meaningful, consistent and sustained reductions in alcohol-related harm – including alcohol-fuelled violence – will not occur unless there is political leadership and commitment at a national level. We know the harms that arise from alcohol, and we know what works. What we lack is genuine political leadership and commitment, backed up by a national implementation plan with clear timelines and targets, to drive reforms and deliver the change needed to prevent the devastating harms from alcohol.

Thank you again for the opportunity to contribute to this Inquiry.

Yours sincerely

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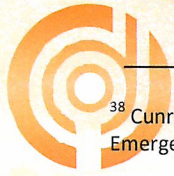
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