

3 October 2024

House Standing Committee on Health, Aged Care and Sport
PO Box 6021
Parliament House
Canberra ACT 2600

Inquiry into the health impacts of alcohol and other drugs in Australia

Dear House of Representatives Standing Committee on Health, Aged Care and Sport,

We welcome the opportunity to provide a submission to the Inquiry into the health impacts of alcohol and other drugs in Australia. Our submission focuses on preventing the impacts of alcohol in Australia and presents a suite of opportunities to reduce the harms caused by alcohol at the federal policy level.

About Alcohol Change Australia.

Alcohol Change Australia is a group of health and community organisations working together to improve the health and wellbeing of the Australian community. Alcohol Change Australia encourages policy change to prevent and reduce alcohol harm in Australia. Further information on Alcohol Change Australia, including our members and policy priorities, can be found on our website at www.alcoholchangeaus.org.au.

Alcohol causes significant levels of harm to the Australian community.

Every Australian deserves to live a happy, healthy life in connected and safe communities. Sadly, this is not the reality for many Australians experiencing harm caused by alcohol products. Alcohol products take a significant toll on our communities, fuelling violence, injuries, and deaths. In Australia in 2022-23, around one third (31%) of people aged over 14 years used alcohol at risky levels (i.e. more than 10 standard drinks per week or more than 4 standard drinks on a single day).¹ Alcohol is the fifth highest risk factor contributing to the burden of disease in Australia and was responsible for 4.5% of the total burden of disease in 2018.¹ Alcohol-induced deaths are currently at their highest rate in a decade and hospitalisations from alcohol are increasing.¹ Alcohol use is causally linked to over 200 disease and injury conditions.² Alcohol causes at least seven types of cancer,³ and was estimated to cause 4% of all new cancers in 2020.⁴ Alcohol products have been shown to contribute to domestic and family violence.^{5,6} The social and economic costs of alcohol use in Australia in 2020/21 was \$72.9billion.⁷

Harms from alcohol are not equally distributed amongst Australians, with some groups experiencing higher levels of alcohol fuelled harm. The alcohol industry relies on people who drink at high-risk levels for much of its profit. In Australia, over half (54%) of all alcohol sold is drunk by 10% of people who use alcohol.⁸ Australians living in regional and remote areas are 1.4 times as likely as those in major cities to use alcohol at high-risk levels.⁹ Alcohol-related mortality rates are 4.2 times higher for Aboriginal and Torres Strait Islander peoples than among non-Aboriginal and Torres Strait Islander

people.¹⁰ While people from lower socio-economic groups are less likely to use alcohol than those from higher socio-economic groups, they are disproportionately harmed by alcohol.¹¹ There is an urgent need to implement policies that will effectively prevent alcohol-fuelled harm in Australia including policies that address the determinants of health and the disproportionate burden of alcohol harms impacting on groups within the population.

The commercial determinants of health and the role of harmful product industries, including the multibillion-dollar alcohol industry, cannot be overlooked when considering the harms from alcohol. The actions of harmful industries, such as marketing or lobbying, regularly undermine public health outcomes.¹² The promotion of harmful products such as alcohol and the pursuit of profit from commercial industries, is incongruent with the need to reduce alcohol use and protect public health.

It's time for action to prevent and reduce alcohol related harm in Australia.

There is significant evidence on policy options to reduce harm from alcohol. For example, the World Health Organization (WHO) best buys recommend increasing excise taxes, restricting or banning advertising and restricting the availability of products, as cost-effective strategies to reduce alcohol-related harm.¹³ We know what works and it is time to implement a systematic, coordinated and evidence-based approach to reduce harm from alcohol in Australia. This approach must be set free from the influence of the alcohol industry, who have a vested interest in maximising the use of alcohol.

Recommendations

Alcohol Change Australia recommends that to reduce harm from alcohol that the Government:

- Deliver a coordinated approach to preventing and reducing alcohol-related harm by:
 - Committing to deliver the overarching National Alcohol Strategy. The strategy must have a clear implementation plan, be sufficiently resourced and be guided by ongoing monitoring and evaluation.
 - Providing adequate investment to implement the National FASD Strategic Action Plan 2018–2028.
 - Implementing the recommendations from the Senate Inquiry into effective approaches to prevention, diagnosis, and support for Fetal Alcohol Spectrum Disorder.
 - Establishing a national governance structure to oversee Australia's action to prevent and reduce harm from alcohol and other drugs.
- Protect the community from alcohol marketing by:
 - Introducing a regulatory framework with legislative basis that effectively protects the community from exposure to alcohol marketing.
 - Prohibiting the collection, use and disclosure of children's data for commercial purposes (including the profiling, monitoring, tracking, and targeting).
- Address cheap alcohol that fuels harm by:
 - Removing the Wine Equalisation Tax and introducing a volumetric tax for wine and other fruit-based alcohol products.
 - Maintaining Consumer Price Index increases on excisable alcohol products.
- Empower the community by raising awareness of the harms caused by alcohol by:
 - Introducing health warning labels on all alcohol products that are mandated, standardised, and present rotating health messages.

- Substantially investing in the development and implementation of evidence-based, targeted, and ongoing campaigns and preventative programs that increase awareness of alcohol harms and the NHMRC Australian guidelines to reduce health risks from drinking alcohol.
- Prohibiting the use of carbohydrate and sugar claims on alcoholic products.
- Create healthy public policy free of industry influence by:
 - Reforming political donation laws to exclude donations from the alcohol industry.
 - Excluding alcohol companies, retailers, and their lobbyists from being involved in the development of public policy in Australia and at the global level.
 - Increasing transparency of interactions between the Australian Government and alcohol industry.

Further details on these recommendations are provided in the section below that presents the response to the inquiry terms of reference.

Thank you once again for the opportunity to make a submission to this inquiry. We look forward to engaging further with the inquiry. Any questions regarding our submission, please contact Natalie Stapleton, Executive Officer – Alcohol Change Australia, at natalie.stapleton@adf.org.au.

Yours sincerely,

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Chair, Alcohol Change Australia

Ms Natalie Stapleton
Executive Officer, Alcohol Change Australia

Response to terms of reference

Terms of reference b) Examine the effectiveness of current programs and initiatives across all jurisdictions to improve prevention and reduction of alcohol and other drug-related health, social and economic harms, including in relation to identified priority populations and ensuring equity of access for all Australians to relevant treatment and prevention services.

Strong governance, supported by a comprehensive, evidence-based strategy and well-resourced implementation plan are critical to reducing health, social and economic harms from alcohol.

In Australia there is an existing overarching strategy to reduce the impact of alcohol. The National Alcohol Strategy 2019-2028 was released in 2019 by the Australian Government and aims to prevent and minimise alcohol-related harms in Australia. The Strategy outlines steps for measuring progress, including the publication of annual activity reports, and identifies a range of indicators and baseline data to measure reductions in alcohol use and harms. However, to date and the best of our knowledge, there has been no public demonstration of the progress being made under the Strategy. Given this, Alcohol Change Australia undertook a review of progress at the midway point in 2023. The full report is available here: <https://alcoholchangeaus.org.au/wp-content/uploads/2024/04/Alcohol-Change-Australia-report-A-mid-point-review-of-the-National-Alcohol-Strategy-April24.pdf>

Our review found that there has been minimal or no change in alcohol use and harms across a range of indicators since the introduction of the Strategy. For example, alcohol-induced deaths are at their highest rate in 10 years, there has been no decline in alcohol-related motor vehicle crashes and use of alcohol at risky levels continues. It is clear that the much-needed comprehensive policy approach to prevent and reduce alcohol harms in our country has not been implemented. This may be a result of the absence of a clear implementation plan for the Strategy, inadequate funding, limited evaluation and monitoring of progress and changes in governance structures. To ensure success moving forward these shortfalls must be corrected.

The Strategy acknowledges the greater impact of alcohol harm on some groups within the population yet provides limited engagement opportunities or policy options to address this. In addition to implementing the Strategy, it should be strengthened to include clear recommendations to support and empower communities who experience greater risk of harm from alcohol.

The National Alcohol Strategy highlights and includes the National Strategy on Fetal Alcohol Spectrum Disorder (FASD). Alcohol exposure at any stage of pregnancy can damage a developing baby's brain, body, and organs. Children and adults who have FASD can experience challenges such as physical and emotional development delay, impaired speech and language development, difficulty controlling behaviour, and learning difficulties such as issues with memory and attention.¹⁴

Supporting people to have alcohol-free pregnancies is important for the health of both mum and baby. Unfortunately, many Australians are still unaware of the risks of alcohol exposure during pregnancy. Nearly one in four Australians are not aware alcohol should be avoided altogether during pregnancy for the health of mum and baby, while almost one in three are unaware drinking alcohol during pregnancy can cause FASD.¹⁵ Australia has one of the highest rates of alcohol use during pregnancy in the world.¹⁶ In 2022-23, around 1 in 4 (28%) Australian women consumed alcohol while pregnant.⁹

The Australian Government has provided a blueprint outlining what action is needed to reduce harms from alcohol exposure during pregnancy. The National FASD Strategic Action Plan 2018–2028 provides a framework for governments, communities, and service providers to reduce the incidence of FASD and its impact.¹⁷ The Government has made some investment in the plan, including funding for a national awareness campaign on alcohol and pregnancy and the expansion of diagnostic services in some states. In addition to this Action Plan, the 2021 final report from the Senate Inquiry into effective approaches to prevention, diagnosis, and support for FASD has 32 recommendations aimed at improving the prevention, diagnosis, and management of FASD.¹⁸

Continued implementation of both the National FASD Strategic Action Plan and the Inquiry recommendations are important measures that will raise awareness of the adverse consequences of alcohol exposure in pregnancy and help to prevent FASD.

Australia requires the establishment of a strong governance structure to implement the national strategies and coordinate Australia’s response to addressing harm from alcohol. This group is needed to provide oversight and coordinate action between the different governments and portfolios. This group must include representatives from the alcohol and drugs sector and people with lived and living experience. This group must also be protected from those with commercial vested interests.

Recommendations:

- Urgent action on alcohol through delivering the National Alcohol Strategy. The national strategy must have a clear implementation plan, be sufficiently resourced and be guided by ongoing monitoring and evaluation.
- Provide adequate investment to implement the National FASD Strategic Action Plan 2018–2028.
- Implement the recommendations from the Senate Inquiry into effective approaches to prevention, diagnosis, and support for Fetal Alcohol Spectrum Disorder.
- Establish a national governance structure to oversee Australia’s action to prevent and reduce harm from alcohol and other drugs.

Terms of reference c) Examine how sectors beyond health, including for example education, employment, justice, social services and housing can contribute to prevention, early intervention, recovery and reduction of alcohol and other drug-related harms in Australia.

There are a number of opportunities to implement changes beyond the health sector to reduce and prevent alcohol related harms in Australia.

1. Protect the community from alcohol marketing.

Every Australian should be able to grow up and live in an environment that supports their health and wellbeing. Yet our community is constantly bombarded with promotions for harmful products, including alcohol. Alcohol companies advertise through a wide range of media, using sophisticated technology to target people with marketing for their products.

This marketing benefits the alcohol industry, whilst coming at a cost to the community. For example, alcohol marketing creates positive social norms around alcohol and increases use of alcohol.^{19,20} For children and young people specifically, the more they are exposed to alcohol advertising, the more likely they are to start using alcohol products at a younger age, and to drink more if they are already using alcohol.²¹ The constant flow of pro-alcohol messages can be confronting for people with lived experience of alcohol harm. Unfortunately, the regular collection of personal data on digital technologies now, means that the people most likely to be targeted with advertising for alcohol and other harmful products are often the people most harmed by these products, such as those experiencing dependence.²²

Regulatory approaches have not kept pace with the increased sophistication and diversity of modern alcohol marketing. Australia continues to rely on voluntary, industry-managed codes and practices for managing alcohol marketing. Research has shown that the self-regulatory system is inadequate, ineffective, and lacks transparency and accountability.^{23,24,25,26,27} Right now, this system does little to reduce the community exposure to alcohol marketing and is failing to protect people's health.

The Australian community wants governments to do more to protect young people from alcohol advertising. The overwhelming majority of Australians believe that alcohol advertising should not be shown to children online (85%). Around two-thirds don't support alcohol advertising being shown during children's television viewing hours (71%) or placed on public transport (69%).²⁸

The Australian Government can introduce higher standards for how the alcohol industry markets and sells its products. We need regulatory systems that ensure safe and healthy environments for everyone, especially for children and other Australians most at risk from harm.

Recommendations:

- Introduce a regulatory framework with legislative basis that effectively protects the community from exposure to alcohol marketing.
- Prohibit the collection, use and disclosure of children's data for commercial purposes (including the profiling, monitoring, tracking, and targeting).

2. Address cheap alcohol that fuels harm.

To help keep our communities safe and well, people should be supported to buy products that promote their health, rather than harm it. Instead, at present we often see harmful products, including alcohol, sold to the community for low prices. In particular, wine and wine-based products

are often available at bottle shops for as little as 30 cents per standard drink.²⁹ The cheaper alcohol products are, the more people may drink, and the more they may experience harm. This affects not just the person using alcohol but their partners, children, and communities.³⁰

In Australia not all alcohol is taxed in the same way. Beer and spirits are taxed based on their alcohol content (the higher the alcohol content, the higher the tax); whereas wine and other alcohol products made from fruit (e.g. ciders) are taxed based on their price (the Wine Equalisation Tax). This means that cheaper wine products are taxed a lower amount than premium wines, even though the alcohol content may be the same. High-volume, high-alcohol wine (such as cask wine) is often being sold at low prices.

Pricing measures are among the most effective in reducing alcohol related harm.³⁰ Research has consistently shown that increases in the price of alcohol contributes to reductions in alcohol use.^{31, 32}

There is support for action on cheap alcohol. Nearly six in 10 Australians (59%) believe that governments should ensure alcohol products are not sold below the price of bottled water or soft drinks.³³ In addition, at least 13 government and parliamentary reviews, including Federal Treasury's 2010 Australia's Future Tax System Review, have concluded that wine should be taxed on a volumetric basis.³⁴ The current tax system can be updated and strengthened to address the very cheap products that fuel alcohol harm.

Recommendations:

- Remove the Wine Equalisation Tax and introduce a volumetric tax for wine and other fruit-based alcohol products.
- Maintain Consumer Price Index increases on excisable alcohol products.

3. Empower the community by raising awareness of the harms caused by alcohol.

Australians have a right to know if the products they are using can cause them harm. Yet many are still not aware of the range and magnitude of the harms caused by alcoholic products, particularly when it comes to alcohol and cancer.^{28,35,36} Recent Australian polling continued to reinforce that awareness of health harms caused by alcohol remains low.³⁷ The poll revealed that less than half of Australians (46%) know that alcohol can cause cancer. One-third of Australians are unaware that drinking alcohol during pregnancy is associated with Fetal Alcohol Spectrum Disorder. Furthermore, over a quarter do not associate alcohol with accidents and injuries (27%) or poor mental health (28%).

Community awareness of the harms caused by alcohol products is currently too low. Rather than seeing regular messages encouraging them to drink more, Australians need to see more health messages that show the true impact of the harms from alcohol.

Years of tobacco control action in Australia have shown how combining effective public health-focused policies with strong public education campaigns can help change social norms. It was not that long ago that tobacco was seen as a normal part of Australian culture, and that smoking in restaurants, offices, and hospitals was accepted. Public education, combined with policy reforms, has helped change the community's perceptions of tobacco and reduce the harm caused.

Unfortunately, compared to smoking, there has been far less investment in public education campaigns to help increase awareness of alcohol harms. Campaigns that highlight the harms caused by alcohol have been effective in changing knowledge, attitudes, and beliefs about alcohol. For

example, the ‘Alcohol. Think Again’ public education program in Western Australia includes campaigns informing the public of alcohol harms and promoting the NHMRC alcohol guidelines; these campaigns have increased understanding of the link between alcohol products and cancer and have ranked among the most effective advertisements in the world for motivating people to reduce their alcohol use.^{38,39}

As a key part of public education, there is also an opportunity to promote health messaging at arguably the most crucial time, when people are buying and using alcohol products. Consumers deserve more honest labelling of alcoholic products. The implementation of mandatory, standardised health warning labels on alcoholic products that present rotating health messages would help raise awareness of the range of short- and long-term harms caused by alcohol at point of sale and point of use. This policy can be enacted through our bi-national food regulatory system led by Food Standards Australia and New Zealand.

Health warning labels on alcoholic products have been found to be an effective way to increase consumers awareness and knowledge of alcohol harms.^{40,41,42} Given health warning labels increase consumers awareness of the risks associated with alcohol they have potential to facilitate behaviour change. Evidence shows that health warning labels on alcoholic products have been effective in impacting consumer intentions to drink, slowing down people’s drinking and reducing alcohol sales.^{41,42,43,44,45}

Australian and New Zealand Governments have demonstrated leadership by mandating the introduction of evidence-based pregnancy health warnings on alcohol products, an important measure to help raise awareness of the risks of alcohol use during pregnancy. Further health messages are needed to communicate the wide range of other harms caused by alcohol. Australia’s experience with pregnancy health warnings demonstrates the necessity of mandating labelling requirements. Mandated labels came after almost a decade of a voluntary warning label scheme self-regulated by the alcohol industry, which was ineffective with low uptake.^{46,47,48}

In addition to providing information about the health impacts of alcohol products, alcohol product labelling should not mislead consumers about alcoholic products and the harms they cause. At present we see many examples of marketing both on product labels and in broader product advertising which create ‘health halos’ around some products, such as ‘low carb’ or ‘low sugar’. Currently, Food Standards Australia and New Zealand are progressing work on Proposal P1049-carbohydrate and sugar claims on alcoholic beverages. If the work underway progresses and is approved, sugar and carbohydrate claims could both be permitted on alcoholic products and consequently be used on the labels and in advertising. This will put profits ahead of public health as the alcohol industry can use these nutrient content claims to promote products to consumers and these claims can mislead consumers to believe some products are healthier options and less harmful to health.

Consumer and public health groups strongly oppose this and recommend that carbohydrate and sugar claims be prohibited on alcoholic products. Research consistently demonstrates that these claims can mislead consumers to perceive products with claims as healthier, less harmful to health and lower in energy (kilojoules).^{49,50} This is concerning as alcohol is an inherently harmful product and there is no safe level of alcohol use. The Trans-Tasman food regulatory system has a responsibility to ensure consumers can make informed choices and are not misled.⁵¹ We strongly recommend that public health be prioritised and the use of carbohydrate and sugar claims on alcoholic products be prohibited.

There is public support for education campaigns and health warning labels. Two thirds of Australians believe there should be public education campaigns about alcohol-related harms, and more than half support health warning labels on alcohol products.^{52,53} Recent polling by Alcohol Change Australia found that 72% of Australians support health warning labels on all alcohol products that raise awareness of the harms caused by alcohol, with only 8% opposed.³⁷

Empowering Australians with the knowledge that alcohol causes harm is an important part of a comprehensive approach to reducing harm from alcohol. The time has come for the Australian Government to commit to raising awareness of the harms from alcohol, help de-normalise alcohol use, and encourage behaviour change.

Recommendations:

- Introduce a health warning label on all alcohol products that is mandated, standardised, and presents rotating health messages.
- Substantially invest in the development and implementation of evidence-based, targeted, and ongoing campaigns and preventative programs that increase awareness of alcohol harms and the NHMRC Australian guidelines to reduce health risks from drinking alcohol.
- Prohibit the use of carbohydrate and sugar claims on alcoholic products.

4. Create healthy public policy free of industry influence.

When developing public policies, in particular health policies, the objective should always be to improve the health and wellbeing of the community. The health and wellbeing of our community must be prioritised over profit in the setting of policy. Unfortunately, in Australia, many commercial groups who benefit from the sale and use of alcohol, are able to influence the development of alcohol policy. In relation to alcohol, commercial groups including alcohol producers, retailers and the trade associations that represent them, sporting codes, the advertising sector, broadcasters, and digital platforms all have conflicts of interest in the development of alcohol policy.

Across production, retail, and wholesaling, alcohol industry revenue in Australia exceeds \$42 billion annually, and profit exceeds \$3 billion annually.⁵⁴ Reducing alcohol-fuelled harm comes at a financial cost to the alcohol and related industries.

Alcohol companies and their lobbyists use similar tactics that the tobacco industry have used to impact on government regulation and undermine effective alcohol policies,⁵⁵ such as:

- casting doubt on legitimate science,
- attacking and intimidating scientists,
- creating front organisations to conduct research,
- manufacturing false debate,
- framing issues in ways that misrepresent the problem,
- funding disinformation campaigns, and
- lobbying to influence the political agenda.⁵⁶

For example, alcohol industry lobbying delayed the implementation of mandatory pregnancy warning labels on alcohol products in Australia.⁴⁶ In the 2022–23 financial year, alcohol companies, retailers and their lobby groups paid at least \$1.325 million in political donations to the major Australian political parties.⁵⁷ Key employees often move between government and the alcohol

industry, creating an imbalance between the influence of industry and that of public health interests.⁵⁸

Previous Director-General of the World Health Organization (WHO), Dr Margaret Chan, stated: “when industry is involved in policy-making, rest assured that the most effective control measures will be downplayed or left out entirely.”⁵⁹

Reducing alcohol-fuelled harms should always be the main objective of alcohol policy. The development of health policies must be protected from distortion by commercial or vested interests. There are a range of measures the Australian Government can introduce to do this, including reforming political donation laws and increasing transparency of interactions between the Government and alcohol industry. The implementation of robust systems for policy development that are guided by the evidence and prioritise the involvement of health experts and people with lived experience would help put people before profits.

Recommendations:

- Reform political donation laws to exclude donations from the alcohol industry.
- Exclude alcohol companies, retailers, and their lobbyists from being involved in the development of public policy in Australia and at the global level.
- Increase transparency of interactions between the Australian Government and alcohol industry.

Terms of reference d) Draw on domestic and international policy experiences and best practice, where appropriate.

The World Health Organisation provides numerous international documents that should be considered within the inquiry. This includes the WHO Global alcohol action plan 2022-2030, the WHO best buys as well as the SAFER framework.^{13,60,61} The WHO publishes stories from international implementation of policy which could provide useful international examples (For example, see here: <https://www.who.int/europe/news/item/15-04-2021-reducing-harm-due-to-alcohol-success-stories-from-3-countries>)

Below we outline international examples of implementation of health warning labels on alcohol products.

There are several international examples of countries using alcohol labelling to raise awareness of broader health harms caused by alcohol.⁴¹ There are a wide range of health warning labels on alcohol products in existence including warnings about a variety of health concerns such as alcohol exposure in pregnancy, drink driving, alcohol guidelines, operating machinery and liver disease. A real-world example of a trial of health warning labels exists from Yukon, Canada. In this study three types of labels, including a cancer warning, were placed on alcoholic products in participating stores. The study found that the labels led to increases in knowledge and awareness of the health risks associated with alcohol use and drinking guidelines.^{62,63} Furthermore, there was a decrease in alcohol sales in the intervention region compared to control.⁴⁵

Recently, Ireland has introduced regulation that will require health warning labels on alcoholic products from 2026.⁶⁴ The comprehensive, evidence-based label will warn consumers about the risks of liver disease, fatal cancers, and drinking alcohol during pregnancy, as well as include information on the energy content of the product and the number of grams of alcohol it contains.

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