

# Submission- National Preventive Health Strategy

29 September 2020

The National Alliance for Action on Alcohol (NAAA) is a coalition of health and community organisations from across Australia which aims to reduce alcohol-fuelled harm. The NAAA was formed in 2009 and represents more than 20 organisations from across Australia. Alliance members represent a diverse range of interests, including public health, Aboriginal and Torres Strait Islander health, child and adolescent health, and family and community services.

The broad coalition of interests represented by the Alliance highlights widespread concern in Australia about alcohol-fuelled harm, and recognises the importance of cross-sector community partnerships. The impacts of alcohol-fuelled harm are far-reaching. Each year, alcohol products are responsible for almost 6,000 deaths among Australians aged 15 years and older and more than 144,000 hospitalisations.<sup>i</sup>

Australian governments need to urgently implement a coordinated strategy so that they can drive and sustain action on this pressing community issue. We applaud the Australian Government's commitment to invest in prevention. All parts of government must prioritise and be made accountable for the prevention of poor health and wellbeing outcomes. The NAAA notes that responsibilities for many policies and regulatory actions that will effectively reduce alcohol-fuelled harms, such as tax, advertising, and liquor licensing, sit outside of the health system.

This submission outlines how a NPHS can take policy action to prevent and reduce alcohol-fuelled harms across the population. In making this submission, we have consulted the Australian Government's 2019–2028 National Alcohol Strategy, which outlines important policy options for all Australian governments. As part of this Strategy, Australia committed to a 10 per cent reduction in harmful alcohol use.<sup>ii</sup>

To achieve these targets, Australian governments need to act to ensure people are placed ahead of alcohol industry profits. Governments can and should take more responsibility for regulating alcohol products. This includes introducing proven policy actions that reduce the harms from alcohol products, and keep people healthy and well.

## Vision and aims

### 4. Are the vision and aims appropriate for the next 10 years?

The NAAA is supportive of the vision. We commend the statement, that *health is not just the present or absence of disease or injury- more holistically, it is a state of wellbeing*, together with a commitment to address the broader causes of health and wellbeing. The NAAA believes that poor health and wellbeing outcomes can be addressed through systemic change that addresses the factors for good health and wellbeing.

We commend the statement that “different sectors, including across governments...will work together to address complex prevention challenges”. The Consultation Paper notes that approaches to improving health need to take the role of social, cultural, economic and physical environments throughout life into account. These areas can be most effectively addressed by the parts of government that are responsible for improving these environments, usually outside of the remit of the health system and sectors.

This is why Australia must take a whole of government approach to improving health and wellbeing. The aims listed could be refined so that they adequately reflect the vision of the Strategy, and recognise the importance of a whole of government approach to improving the health and wellbeing of all Australians.

#### **Recommendations:**

Strengthen the aims of the strategy by:

1. reflecting the importance of addressing the broader causes of poor health and wellbeing through a whole-of-government, systemic approach to prevention of poor health outcomes.
2. ensuring that all parts of government work to improve health and wellbeing outcomes through improving social, cultural, economic and physical environments.

## Goals of the strategy

### 5. Are these the right goals to achieve the vision and aims of the Strategy? Is anything missing?

Australia needs a whole of government, evidence- based approach to prevent poor health outcomes. The NPHS goals should reflect the crucial role that all parts of government can play in prevention. We commend the commitment to embed prevention in the health system, and suggest that the Strategy could be strengthened by stating that ‘Prevention of poor health and wellbeing outcomes must be embedded across government’.

It is important to recognise that the health sector in isolation has limited capacity to address the broader causes of poor health and wellbeing. All government-funded sectors must be made accountable for improving health and wellbeing outcomes.

#### **Recommendations**

Strengthen the goals of the Strategy by:

1. ensuring that governments at all levels are made accountable prevention of poor health and wellbeing outcomes.
2. ensuring that prevention is embedded across government.

## Boosting action in focus areas

### 7. Where should efforts be prioritised to reduce the harm caused by alcohol?

The NAAA believes that everyone should have the opportunity to live in a community that keeps them and their family safe and free from harm. However, this opportunity is not afforded to many individuals, families and communities who experience harm caused by alcohol. Alcohol takes a significant toll on our communities, fuelling violence, injuries and deaths. Alcohol causes at least seven types of cancer, and other chronic diseases. Each year, alcohol products are responsible for almost 6,000 deaths among Australians aged 15 years and older and more than 144,000 hospitalisations.<sup>iii</sup>

The NPHS should include policy action that will prevent and reduce alcohol-fuelled harms across the population. In making this submission, we have consulted the Australian Government's 2019–2028 National Alcohol Strategy, which outlines important policy options for all Australian governments. As part of this Strategy, Australia committed to a 10 per cent reduction in alcohol use.<sup>iv</sup>

The Strategy notes Australia's standing as an international leader in prevention, particularly in achieving success in reducing tobacco use and the number of Australians smoking. Australia took a comprehensive, long term approach to reducing tobacco-related harm. Governments used a range of tools to achieve this goal, through taxation, smoking bans, regulation, support from health services and outdoor smoking bans. The NAAA advocates for a similar comprehensive approach, recommending that Australia prioritise the following policy actions to reduce alcohol-fuelled harms at a population level.

**Priority one:** Protect children from advertising of alcohol products

**Priority two:** Support pricing policies that reduce alcohol-fuelled harms.

**Priority three:** Raise awareness of alcohol harms to change behaviours.

**Priority four:** Prevent the consumption of alcohol products during pregnancy.

**Priority five:** Prevent alcohol industry interference in policymaking.

**Priority six:** In addition, the NAAA recommends that state and territory governments can take action to reduce harm fuelled by online sales and delivery of alcohol products.

## Taking policy action to reduce alcohol-fuelled harm

### Priority one: Protect children from advertising of alcohol products

The alcohol industry advertises relentlessly through media and in places where children and young people can see it. Young Australians regularly see many forms of advertising of alcohol products. More than half (58 per cent) of school students aged 12–17 years report seeing alcohol advertising on television, and more than a third report having seen alcohol advertisements on billboards and in print publications (37 per cent) and online (39 per cent).<sup>v</sup>

Exposure to alcohol advertising shapes young people's beliefs and attitudes about drinking, and makes them more likely to start using alcohol products at a younger age and to drink

more if they are already using alcohol.<sup>vi,vii</sup> Alcohol sponsorship of sport also has a strong influence on young people.<sup>viii</sup> A systematic review of the impact of exposure to alcohol sports sponsorship and subsequent alcohol consumption found all seven studies reported positive associations between exposure to alcohol sports sponsorship and self-reported alcohol use.<sup>ix</sup>

Alcohol advertising is highly visible in traditional forms of media such as television, radio and print. In line with the expansion of digital platforms, advertising is now increasingly targeted, time-relevant and interactive. Social media platforms allow people to engage with alcohol brands, and research has found 'liking' or following alcohol marketing pages on social media is associated with riskier alcohol use among young Australians.<sup>x</sup> Regulatory approaches have not kept pace with the increased sophistication and diversity of modern alcohol marketing. Even well-established forms of alcohol advertising, such as alcohol sponsorship, and advertising on catch-up TV services, are not covered by existing voluntary industry and co-regulatory codes.

The Australian Government should introduce legislation to comprehensively regulate alcohol advertising. States and territories should introduce complementary legislation to regulate forms of advertising within their jurisdictions, such as outdoor advertising. This would be similar to the legislative approach taken to tobacco advertising.

## Recommendations

1. Reduce children's exposure to alcohol advertising by introducing independent, legislated controls that cover the volume, content and placement of all forms of alcohol advertising across all media and platforms.
2. Phase out alcohol sponsorship of sports teams, sporting events and music events

## Priority two: Support pricing policies that reduce alcohol-fuelled harm

Alcohol is very affordable in Australia. Cheap prices encourage higher levels of use of alcohol products, resulting in higher levels of alcohol-fuelled harm, affecting not just the drinker but their partners, children and communities. Research has consistently shown that people drinking at high-risk levels are more likely to purchase low-priced alcohol products than those drinking at less risky levels. It is clear that the alcohol industry profits from a business model that causes significant harm. The industry relies on heavy drinkers for the vast majority of its profit; over half (54 per cent) of all alcohol sold in Australia is consumed by just 10 per cent of drinkers.<sup>xi</sup>

Pricing measures are among the most effective in reducing alcohol-fuelled harm.<sup>xii</sup> Taxation and other price reform measures would reduce alcohol-fuelled harms among the groups most at risk of short and long-term health harm. Research shows that an increase in alcohol tax/price would effectively target all heavy alcohol users, but with the scale of impact stronger among those on lower incomes.<sup>xiii</sup>

The alcohol industry should pay tax proportionate to the harm caused by the sale of alcohol. In 2010, it was estimated that alcohol-fuelled harm cost Australia \$36 billion every year. This estimate includes direct and measurable costs such as healthcare, crime and child protection. There is a clear pathway forward for reforming the tax system to reduce alcohol-

fuelled harms as well as public support to do so, with nearly six in 10 Australians (59 per cent) believing that governments should ensure alcohol products are not sold below the price of bottled water or soft drinks.<sup>xiv</sup>

All alcohol tax should be increased by at least 10 per cent to address broad and widespread harm fuelled by sales of alcohol products. There should also be a minimum unit price in place in each state and territory to prevent heavy discounting and loss-leading practices where the cost of higher tax is not passed onto the consumer. A minimum unit price was introduced in the Northern Territory in 2018 as part of a suite of interventions. A 2020 evaluation found that it has been associated with significant declines in a range of alcohol-fuelled harms, including assaults, ambulance attendances, emergency department presentations and road traffic attendances.<sup>xv</sup>

#### **Recommendations:**

1. Introduce a volumetric tax across all alcohol products.
2. Increase all alcohol tax by at least 10 per cent.

### Priority three: Raise awareness of the harms caused by alcohol to inform and influence Australians

Australians need to see more health messages that show the true impact of the harms caused by alcohol products and see fewer messages that portray these products as a fun, normal part of Australia's culture. Australians don't have the full picture when it comes to the harm caused by alcohol products. These products cause at least seven different types of cancers, as well as other chronic diseases, and cause almost 6,000 deaths a year in Australia overall. However, the link between alcohol products and cancer is not well understood by the community.<sup>xvi,xvii,xviii</sup>

The time has come for the Australian Government to substantially invest in sustained, effective mass public education campaigns to raise awareness of these impacts, help denormalise alcohol use, and encourage behaviour change. Campaigns should occur alongside policy change that will protect the community from the harm caused by this drug.

Public health mass media campaigns have been shown to be effective in building knowledge and changing health behaviour when implemented as part of a comprehensive approach and when they achieve repeated exposure.<sup>xix</sup> This is most notable in relation to reducing tobacco use and in reducing prevalence of driving under the influence of alcohol.<sup>xx,xxi,xxii,xxiii</sup> Public education campaigns that highlight the health and safety harms caused by alcohol have been effective in changing knowledge, attitudes and beliefs about alcohol<sup>xxiv</sup>.

In tobacco control, the integration of policy and public education campaigns has helped change social norms. It was not too long ago that tobacco was seen as a normal part of Australian culture, and that smoking in restaurants, and hospitals was accepted. Cigarette advertising across sporting events and in the community was pervasive. Public education, combined with policy reforms, has helped change the community's perceptions of tobacco and reduce the harm caused.

In Australia, there has been limited use of mass media campaigns to increase awareness of the long-term harms to health caused by alcohol use. An exception is Western Australia where the Mental Health Commission has run ongoing mass media campaigns to inform the public of alcohol harms and to promote the NHMRC guidelines for low-risk drinking.<sup>xxv</sup> Evaluations of these campaigns support continued investment in research-based public education. These campaigns have increased public understanding of the link between alcohol products and cancer and have ranked among the most effective alcohol harm reduction advertisements globally for motivating drinkers to reduce their drinking.<sup>xxvi,xxvii</sup>

#### **Recommendations:**

- 7. Substantially invest in the development and implementation of evidence-based, effective, targeted and ongoing campaigns and preventative programs that increase awareness of alcohol harms.**

### Priority 4: Prevent the consumption of alcohol products during pregnancy

Use of alcohol products during pregnancy is associated with a range of adverse consequences including a three-fold increase in miscarriage and a six-fold increase in stillbirth, premature birth and low birth weight, and Fetal Alcohol Spectrum Disorder (FASD).<sup>xxviii,xxix</sup> No amount of alcohol during pregnancy is safe.<sup>xxx</sup>

FASD is the leading cause of preventable developmental disabilities in Australia and these disabilities are lifelong. Most children and adults who have FASD live with significant cognitive, behavioural, health and learning difficulties, including problems with memory, attention, cause and effect reasoning, impulsivity, receptive language and adaptive functioning difficulties.<sup>xxxi</sup> A 2018 study indicates that the prevalence of FASD in youth detention in Western Australia is 36 per cent.<sup>xxxii</sup>

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 over the next 10 years.<sup>xxxiii</sup> The plan has four priorities: prevention, screening and diagnosis; support and management; priority groups; people at increased risk. The plan aims to reduce the prevalence of FASD in the Australian community and reduce the impact that FASD has on individuals, families, carers and communities.

The Federal Government has so far provided \$7.2 million to aid implementation of the plan but more is needed. In addition to funding for the plan, the Federal Government has awarded a further \$25 million towards a national campaign on alcohol and pregnancy, with work commencing from mid-2020. This campaign will target the general population as well as particular priority groups such as women who are alcohol dependent or who have previously had a child with FASD. However, in comparison little has been done or committed at a state and territory level, and the Northern Territory is the only jurisdiction with a strategic plan to prevent and address FASD. FASD is also being considered by a Senate Inquiry which is due to report at the end of 2020. This inquiry is reviewing the recommendations from the previous inquiry and work undertaken in the intervening years, and assessing further work to be pursued.

A successful strategy will require cooperation across jurisdictions, portfolios and, most importantly, recognition that FASD affects some of the most vulnerable and traumatised Australians. An approach which stigmatises Australians risks being counterproductive.

**Recommendations:**

- 3. Provide adequate investment to implement the *National FASD Strategic Action Plan 2018–2028*.**
- 4. Implement the findings from the Senate Community Affairs Committee inquiry into *Effective Approaches to Prevention, Diagnosis and Support for Fetal Alcohol Spectrum Disorder*.**

## Priority five: Prevent alcohol industry interference in policymaking

The alcohol industry's motivation is to make money. Across production, retail and wholesaling, revenue in Australia exceed \$42 billion annually, and profit exceeds \$3 billion annually.<sup>xxxiv</sup> The alcohol industry relies on heavy drinkers for the vast majority of its profit; over half (54 per cent) of all alcohol sold in Australia is consumed by just 10 per cent of drinkers.<sup>xxxv</sup>

Research shows that the alcohol industry uses the same tactics as the tobacco industry to prevent or delay government regulation and undermine good public policy. Alcohol industry actors (producers and retailers) are highly strategic and well organised in influencing national policy-making.<sup>xxxvi</sup> Strategies include:

- 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.<sup>xxxvii</sup>

In the 2017–18 financial year, alcohol industry organisations and retailers paid at least \$1.8 million in political donations to the major Australian political parties.<sup>xxxviii</sup> It is commonplace for key employees to move between government and the alcohol industry, creating an imbalance between the influence of industry and that of public health interests.<sup>xxxix</sup>

Governments must prioritise the protection of alcohol policy development from influence by vested interests. They can also establish mechanisms to ensure healthy and transparent governance.

**Recommendations:**

- 5. Prohibit political donations from the alcohol industry.**
- 6. Prohibit the alcohol industry from being involved in developing alcohol policy.**

**7. Reform lobbying roles to reduce opportunities for key employees to move between government and the alcohol industry, and increase the transparency of interactions between the two.**

## Priority six: Reduce harms from online sales and delivery of alcohol products

Online sales and rapid delivery of alcohol products have increased significantly during the COVID-19 pandemic and are likely to significantly contribute to alcohol-fuelled harm across the country. Vulnerable people are likely to be harmed by alcohol businesses which deliver alcohol products to people's homes in rapid timeframes and late at night. This enables people to buy alcohol on impulse and when it runs out, at a time when their decision-making capacity may be diminished. Alcohol-fuelled harms, such as assault, are more likely to occur at night.<sup>xi</sup>

Research indicates that online sales and delivery of alcohol has created a step change in availability and risk. A 2020 Australian survey found that for some people, rapid services enabled them to keep drinking when they would have otherwise had to stop; 40 per cent reported that on some, most or all occasions they would have had to stop drinking if not for the availability of the rapid service. This increased to 77 per cent for weekly service users.<sup>xii</sup> A further Australian survey found that 69 per cent of respondents who recently received a rapid delivery drank at a risky level (5 or more standard drinks) on that occasion, and 29 per cent at a very high risk level (11 or more standard drinks).<sup>xiii</sup> People who use rapid delivery are also more likely to report very risky drinking, compared to non-users; almost a quarter (23 per cent) of rapid delivery users are very risky drinkers compared to 1 in 10 (11 per cent) non-users.<sup>xiii</sup>

In Australia, online retailers are not verifying age at point of sale for alcohol, and yet most (75.4 per cent) advertise a willingness to leave alcohol unattended at an address.<sup>xiv</sup> Two Australian surveys show a quarter (24 per cent) of people aged 18–24<sup>xv</sup> and over a third (36 per cent) of people aged 18–25<sup>xvi</sup> did not have their ID checked when receiving their last order.

Online retailers are also delivering alcohol to people who are already intoxicated. A 2020 Australian survey found that more than 20 per cent of people surveyed who use rapid alcohol delivery services (other than Airtasker) regularly receive their alcohol orders despite already being intoxicated.<sup>xvii</sup>

All state and territory governments should introduce effective regulation of online sales and home delivery of alcohol products under state and territory liquor licensing legislation. Alcohol retailers should be required to verify the age of people they sell alcohol to online. They should also be prevented from delivering alcohol in rapid timeframes and late at night. In addition, retailers should not be able to sell or supply alcohol products to a person via online sales and home delivery if they would be prohibited from selling or supplying alcohol products to that person face-to-face.

This includes children under the age of 18 years and adults who are intoxicated.

## Recommendations

8. Prevent delivery of alcohol products within two hours of an order being placed, and between the hours of 10pm and 10am.
9. Require age to be verified at the point of online purchase of alcohol products, and photo identification to be witnessed when alcohol orders are delivered or collected.

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