

ALSA Response to – Alcohol Discussion Paper

The National Preventative Health Taskforce

(Submitted on line January 2, 2009)

Thank you for the opportunity to respond to the discussion paper “Preventing Alcohol-related Harm in Australia”

However, the limited space to make a well considered and argued commentary and no previous consultation with industry throughout the development of the paper are questioned and impact to restrict balanced debate.

Some data presented is discounted e.g. (P 16) “Trends in youth drinking are unclear..” then goes on to question the data as “.. raises concerns about the sensitivity of the population surveys in detecting changes in harmful drinking patterns..”.

Is there really a trend in increasing youth alcohol consumption and increasing abuse, or is there in part, poly and / or illicit drug use, or simply changes in youth risk taking behaviour?

The unquestioned use of data from Collins and Lapsley is of concern (Collins and Lapsley 4, 100) as that has recently been criticised as having "apparent upward bias in most of the cost estimates" and "Methodology and Data use are singularly poor" and “there are fundamental flaws in the methods used” (Access Economics Reviews of Collins and Lapsley, 28 November 2008 and 16 December 2008).

It is also disappointing to note that many important initiatives have been ignored, e.g. “ID-25” and “DON’T BUY IT FOR THEM” – in addition to the lack of any recognition of the role of the Australian liquor industry as a valuable key stakeholder.

Interestingly there is no mention of the significant DrinkWise cultural change campaign that has shown very positive signs of success in the early evaluations. This is surprising considering it was launched by the Commonwealth Government, with their cooperation and funding support - why was this ignored?

Discussion of Australian alcohol consumption trends is misleading, (P 5, P 6) suggesting that Australia’s alcohol consumption is high by World standards and presented as a selective table of only 10 countries when Australia is 30th on the WHO list and misleadingly in some cases compares Australia’s alcohol consumption as high against countries with quite different cultural, economic, religious and or social reasons for lower alcohol consumption e.g Indonesia, China and Papua New Guinea.

The paper quotes an unsubstantiated claim that “our international ranking is likely to be even higher”(P5), - suggesting an upward trend, when the 9.88 litres per capita quoted in 2007, is around 20% less than twenty years prior.

The facts suggest the link drawn at item 2.4 (P 9) tell the reverse of the commentary!

Alcohol consumption between 1984 and 2004 is erroneously quoted (P9) as “changing little over 20 years”, to demonstrate that (the price of and) household expenditure on alcohol has not risen relative to other commodities.

Per capita consumption of alcohol has actually fallen by over 20% in the period from 1984 to 2004, while the percentage of household expenditure according to the figures quoted (P 9) has fallen from 3.4% to 2.6% over the same period. This suggests that the relative price of alcohol and percentage of household expenditure on alcohol has risen significantly higher, relative to other commodities.

The Australian retail liquor store industry has cooperated in different jurisdictions around Australia, with restrictions on operating times and restrictions on sales of product types and pack sizes (P 21), however it is questionable if these measures may only serve to distort consumption into other products and or forms of alcohol, or other (often illicit) and potentially more harmful substances.

The Australian Liquor Stores Association (ALSA) has a solid history of cooperation and again expresses the desire to work with governments to combat alcohol misuse. ALSA welcomes the opportunity for meaningful consultation on the development of this important policy area.

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