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Dear Review Manager,

SUBMISSION TO THE *REVIEW OF THE LIQUOR PROMOTION GUIDELINES*

Thank you for the opportunity to provide a submission to the *Review of the Liquor Promotion Guidelines*.

AMA (NSW) is a medico-political organisation that represents more than 9,000 medical professionals, including doctors-in-training, career medical officers, staff specialists, visiting medical officers and specialists and general practitioners in private practice in NSW. AMA (NSW) is a former founding member of the Last Drinks Coalition, and a prominent member of the NSW/ACT Alcohol Policy Alliance (NAAPA). NAAPA is a coalition of 48 organisations working to reduce alcohol-related harms by ensuring that evidence-based solutions inform alcohol policy discussions in NSW and the ACT.

AMA (NSW) endorses the NSW ACT Alcohol Policy Alliance's (NAAPA) submission to this review.

The *Liquor Promotion Guidelines NSW* are an essential component of NSW's efforts to curb alcohol harm. Alcohol is one of the most heavily promoted products in the world.ⁱ The promotion of alcohol contributes to the normalisation of its use and reinforces the harmful drinking culture that currently exists in Australia.ⁱⁱ The Liquor Promotion Guidelines are therefore an essential plank in the NSW Government's public health infrastructure.

Alcohol promotions in Australia are more prolific than ever, with an unprecedented number of platforms for advertising now available through social media and the sponsorship of sporting and cultural events. As technologies and promotions have moved forward, the guidelines have struggled to keep up. Notably the Guidelines require updating to ensure they tackle new promotion avenues and take seriously the impact of off-licence venues (responsible for 80% of all alcohol purchased in Australia).

Young people are particularly vulnerable to alcohol advertising. Exposure to alcohol marketing and promotions shape young people's attitudes towards drinking and behaviours. Research shows that the more alcohol promotions young people are exposed to, the earlier they will start to drink and if they already drink, it increases the amount they will consume.^{iii, iv, v} This is particularly concerning as young people experience disproportionate levels of alcohol-related harms. Young people's exposure

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to alcohol promotions is not restricted to licenced venues. To effectively reduce the harm from liquor promotions, restrictions must apply to all entities involved in the promotion, distribution and sale of liquor in NSW.

As indicated in the AMA's policy paper, *Alcohol Marketing and Young People*, young people are starting to drink at an earlier age, and most drink in ways that put their health at risk.^{vi}

Childhood and adolescence are critical times for brain development, and the brain is more susceptible to alcohol-induced damage during these times, while being less sensitive to cues that moderate alcohol intake. Prior to the mid-20s, the human brain is still developing. At this early age, alcohol consumption can lead to structural changes in the hippocampus, a part of the brain involved in learning processes. High levels of alcohol consumption can permanently impair brain development. The consequences of alcohol misuse among children or young people can therefore be profound in both the short and long term.

Numerous studies have indicated that those who commence drinking at an earlier age experience an increased risk of physical, social and mental health problems later in life. The rates of harmful drinking are highest among young adults aged 20 to 29 years. However, it is the drinking patterns established in adolescence that are often most decisive in shaping later drinking behaviours, with harmful drinking in adolescence substantially increasing the risk of developing dependent or risky patterns of use in young adulthood and later life. Accordingly, those with heavier consumption in their mid-teens tend to have heavier alcohol consumption and dependence in early adulthood. Those who start drinking early not only risk causing irrevocable damage to their brain, but are also at a heightened risk of developing long-term, chronic health conditions associated with alcohol misuse.

The harmful use of alcohol among young people is a significant public health challenge in Australia, with short- and long-term consequences for individuals, their family and friends, and for the wider community. Understanding and addressing the factors driving alcohol misuse is, therefore, a public health priority.

Addressing the marketing and promotion of alcohol to young people is a critical element in an overall strategy to address this issue. A growing evidence base that links alcohol marketing to harmful drinking patterns amongst young people, combined with renewed public scrutiny of the inappropriate promotion of alcohol, has created added impetus to tighten restrictions around alcohol marketing.

AMA (NSW) suggests that preventing alcohol marketing to young people needs to be incorporated as part of a comprehensive and multi-faceted strategy addressing alcohol-related harms in Australia.

The community will support action to address alcohol promotions. Recent polling shows that NSW adults believe that:^{vii}

- the alcohol industry targets young people under 18 years (52 per cent)
- more needs to be done to reduce alcohol harm (72 per cent)
- alcohol companies are not doing enough to address alcohol harm (59 per cent)
- clubs and pubs are not doing enough to address alcohol harm (56 per cent)
- alcohol advertising on television before 8.30pm should be banned (62 per cent).

In order to deliver positive outcomes it is essential that the alcohol industry be prevented from undermining the Guidelines and placing their business interests above health and community safety.

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AMA (NSW) would like to draw your attention to the inappropriate industry involvement with the previous consultation in 2012-2013. It is clear from the documents released under Freedom of Information (FOI) that during that consultation the alcohol industry was able to significantly influence the development of the Guidelines. A thorough explanation and copies of the documents are attached to the NAAPA submission.

To achieve the purpose of the Liquor Act 2007, AMA (NSW) recommends that the NSW Government:

1. Ensure that all liquor promotions in NSW, regardless of promoting entity or method, must not contravene the principles set out in s102(2) of the *Liquor Act 2007*.
2. Specifically legislate to ban problematic promotions, including:
 - shopper dockets and other harmful price discounting mechanisms;
 - alcohol promotions on government infrastructure and property, including public transport, particularly where children and young people are exposed; and
 - alcohol sponsorship and advertising from sporting and cultural events in NSW.
3. Improve the useability of the Liquor Promotion Guidelines by including examples of inappropriate placement within the Liquor Promotion Guidelines.
4. Ensure that all further development and revision of liquor promotions and marketing in NSW occurs independently of the alcohol industry.

In the future the Guidelines must prioritise harm minimisation and community safety. They should apply equally across all licence types and across all media platforms, to ensure coverage across all harmful promotions. Most importantly, they must not preference business interests of the alcohol industry at the expense of the public.

AMA (NSW) would be happy to elaborate further on the points in this short submission, and we thank you for the opportunity to contribute to the review process.

Yours sincerely,



Dr Kean-Seng Lim
President, AMA (NSW)

ⁱ Jernigan D. (2010). The extent of global alcohol marketing and its impact on youth. *Contemp Drug Probl.* 37:57–89.

ⁱⁱ Australian Medical Association (2012). *Alcohol Marketing and Young People: Time for a new policy agenda*. Canberra: AMA

ⁱⁱⁱ Anderson, P., De Bruijn, A., Angus, K., Gordon, R., & Hastings, G. (2009). Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol and Alcoholism* 44, pp. 229-43.

^{iv} Jones, S. and Magee, C. Exposure to alcohol advertising and alcohol consumption among Australian Adolescents. *Alcohol Alcsm.* 46(5):630-637. 2011.

^v Snyder, L.B., Milici, F.F., Slater, M., Sun, H., and Strizhakova, Y. (2006). Effects of alcohol advertising exposure on drinking among youth. *Archives of Pediatrics and Adolescent Medicine* 160(1), pp. 18-24.

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- vi Australian Medical Association (2012). Alcohol Marketing and Young People: Time for a new policy agenda. Canberra: AMA
- vii Foundation for Alcohol Research Education (2018). Annual Alcohol Poll: Attitudes and behaviours. FARE: Canberra