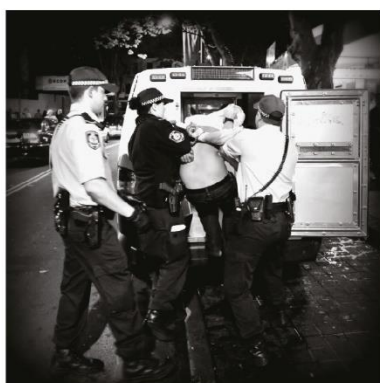




**Submission to the Liquor & Gaming NSW evaluation of Kings
Cross alcohol sales data reporting requirement Discussion Paper**



April 2017

About the NSW ACT Alcohol Policy Alliance

The NSW ACT Alcohol Policy Alliance (NAAPA) aims to reduce alcohol harms by ensuring that evidence-based solutions inform alcohol policy discussions in New South Wales (NSW) and the Australian Capital Territory (ACT). NAAPA currently has 48 member organisations from a range of fields including health, community, law enforcement, emergency services and research.

To contact the NAAPA secretariat email info@naapa.org.au or for more information about NAAPA visit www.naapa.org.au

The following are the NSW members of NAAPA:

- Network of Alcohol and Drug Agencies (NADA)
- Darlinghurst Resident Action Group (DRAG)
- Newcastle Community Drug Action Team
- Policy Association of NSW
- Australian Medical Association (AMA) NSW
- The Royal Australasian College of Surgeons (RACS) NSW
- Public Health Association NSW Branch
- Cancer Council NSW
- National Drug and Alcohol Research Centre (NDARC)
- Centre for Health Initiatives, University of Wollongong
- Hello Sunday Morning
- The Australasian College for Emergency Medicine (ACEM) NSW
- Jewish House
- Inspire Foundation
- The Asia Pacific Centre for Crime Prevention Griffith University (Sydney)
- University of Newcastle
- Ulladulla Community Drug Action Team
- Drug and Alcohol Research and Training Australia (DARTA)
- Bondi Residents Association
- Noffs Foundation (NSW)
- St Vincent's Hospital
- Australian Drug Foundation
- Health Services Union
- Pedestrian Council of Australia
- The Salvation Army NSW
- Awabakal Newcastle Aboriginal Co Operative Ltd
- The Royal Australasian College of Physicians (RACP) NSW
- Byron Bay Youth Service
- Law Enforcement Against Prohibition
- NSW Nurses and Midwives Association
- 2011 Residents Association
- Bondi beach precinct
- Last drinks in Byron
- CatholicCare Goulburn
- Mental Health Association of NSW
- The Royal Australian College of General Practitioners (RACGP) NSW
- The Potts Point and Kings Cross Heritage Conservation Society
- Thomas Kelly Youth Foundation
- Australian Salaried Medical Officer's Federation NSW (ASMOF NSW)

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Summary

The NSW ACT Alcohol Policy Alliance (NAAPA) welcomes the opportunity to provide comment on the *Liquor & Gaming NSW evaluation of Kings Cross alcohol sales data reporting requirement Discussion Paper* (Discussion Paper). NAAPA's submission supports the 2016 research report conducted by the Centre for Alcohol Policy Research (CAPR) on *Understanding Alcohol Sales Data in Australia* (2016 CAPR Report).ⁱ A copy of this report is enclosed for your reference.

While NAAPA appreciates that the Discussion Paper is an examination of the current Kings Cross precinct alcohol sales data collection, NAAPA maintains that state-wide alcohol sales data is the only appropriate and reliable collection method for the NSW Government.

Comprehensive and standardised alcohol sales data allows for better monitoring of alcohol availability and consumption. Alcohol harm is significant, resulting in more than 5,500 lives lost and 157,000 hospitalisations each year in Australia.ⁱⁱ In addition to the pain and suffering this causes, alcohol harm come at considerable expense costing the NSW Government an estimated \$1.03 billion each year.ⁱⁱⁱ

Increased availability of alcohol results in an increase in consumption, thereby increasing the risk of alcohol harm. Increased availability of alcohol is associated with an increase in assaults,^{iv} domestic violence,^{vi} road crashes,^{vii} child maltreatment,^{viii} and harmful consumption.^{ix} Addressing the harm associated with alcohol consumption will reduce the burden it places on public resources. Monitoring alcohol sales has been identified as a key strategy to manage alcohol harm.

The collection of alcohol sales data is important, as it is critical to informing policy, targeted prevention and resource management. The World Health Organization (WHO) recommends sales data as the most reliable and accurate method for measuring alcohol consumption within communities.^{xi} State-wide sales data helps inform stakeholders and allows them to understand and compare significant health information relating to alcohol. It is this accurate representation of consumption trends through state-wide data, that is invaluable to evidence-based alcohol policy. It enables the implementation of targeted reforms and is crucial for monitoring and evaluation.

NSW is the only state or territory not collecting or committed to collecting state-wide alcohol sales data. Only on-premises licensees within the Kings Cross precinct that trade after 8pm are required to report data on their retail alcohol sales. By collecting state-wide data rather than the Kings Cross precinct alone, NSW will be aligned with other states and territories making for better national data collection and analysis.

There is no clear purpose for the Kings Cross alcohol sales data collection project, making the process burdensome on retailers and of no use to key stakeholders. The Discussion Paper asks for comment on the *"availability and usefulness of the data to stakeholders"*. Currently the data is unavailable to stakeholders and therefore useless. Furthermore, the data is not representative due to its small sample size and limited geographical scope. The project is concerned only with a high alcohol consumption, entertainment precinct, thereby rendering the data useless in offering any information on NSW per capita consumption. It ignores valuable sales data information from other areas of Sydney as well as other cities and regional areas within NSW. It also fails to recognise the importance of sales data from online and take-away liquor outlets. This is a concern given that 80 per cent of alcohol is sold at packaged liquor outlets.^{xii}

The current collection method lacks purpose, representativeness and scope. In order to overcome these shortcomings, NAAPA recommends that the NSW Government collect alcohol sales data in line with the recommendations of the National Drug Research Institute (NDRI) and the 2016 CAPR Report.

The review of the Kings Cross alcohol sales data project should assist Liquor & Gaming NSW in establishing a standardised, state-wide collection method. Any shortcomings of the Kings Cross project should not be used as an excuse to cease alcohol sales data collection altogether, but rather as key considerations for future projects. The lack of state-wide data is impeding the licensing and planning processes within NSW, as the local geographical impacts from alcohol outlets cannot be accurately quantified. It is evident that there is a clear necessity for state-wide data collection.

Submission Format

The NAAPA submission should be read in conjunction with the Liquor & Gaming NSW Discussion Paper and the 2016 CAPR Report.

NAAPA's response will comment on three key areas:

1. Purpose of the current Kings Cross alcohol sales data project
2. Availability and usefulness of the Kings Cross alcohol sales data project
3. The case for state-wide data collection

NAAPA supports the collection of alcohol sales data in order to reduce the costs associated with alcohol harm.

Recommendations

- i. That the NSW Government outline a clearly defined objective for the Kings Cross alcohol sales data project.
- ii. That the NSW Government develop a report and publish the Kings Cross alcohol sales data that has been collected. This report should be used to guide the implementation of state-wide collection.
- iii. That the NSW Government collect state-wide wholesale and producer alcohol sales data at the transaction level detailing alcohol type, volume and cost, as well as the purchasers' retail licence number.
- iv. That the NSW Government implement state-wide alcohol sales data reporting that allows it to participate in the National Alcohol Sales Data Project.
- v. That the NSW Government explores opportunities to make retail alcohol sales data reporting easier and implement these changes state-wide.

1. Purpose of the current Kings Cross alcohol sales data project

The current Kings Cross alcohol sales data project is severely lacking a clearly defined policy rationale. There are a number of challenges with the current reporting system, specifically the lack of a clear purpose for the data collection. In December 2013, the NSW Government passed legislation mandating all venues licensed to trade after 8pm in the Kings Cross precinct, record the amount and type of alcohol sold between 8pm and 5am. The collection of alcohol sales data was included in the Kings Cross precinct plan of management. The Discussion Paper states that:

The objectives of the alcohol sales data reporting requirement are to:

- *Help shape compliance efforts by the NSW Police and L&GNSW, and*
- *Inform future policy decisions by the Government in relation to the Kings Cross precinct*

However, it is not evident that these objectives are being met. There is limited information on how the sales data is being used and what purpose it is serving. It is unknown if the information collected is being used to inform policy development and shared among government agencies, in particular NSW Health. It is also unclear why Liquor & Gaming NSW are collecting alcohol sales data only from the Kings Cross precinct.

Recommendation:

- i. **That the NSW Government outline a clearly defined objective for the Kings Cross alcohol sales data project.**

2. Availability and usefulness of the Kings Cross alcohol sales data project

The alcohol sales data from Kings Cross venues is not publicly available. The Discussion Paper states *“Liquor & Gaming NSW has not published the data to date due to commercial and privacy requirements”*. These limitations surrounding privacy can be overcome by publishing de-identified data. Specific venue details are not fundamental to overall policy development.

The lack of information surrounding the Kings Cross alcohol sales data project renders the data useless. Transparency and availability of data is key to policy development and research. Transparency reflects the commitment to credibility and increases output legitimacy.^{xiii} It also helps with compliance as licensees can see what is happening to the data they are providing to regulators.

Reliable alcohol sales data provides valuable health information on consumption levels and patterns.^{xiv} However, the current method does not provide such information. It is not representative as it only looks at a small area that is a high alcohol consumption area, with a diverse demographic of individuals that come from all over the city, state, country and overseas. This means that you cannot discern any informative patterns based on demographic or geographical area, thereby limiting the usefulness of the data in guiding alcohol policy and research.

Furthermore, gathering data from only on-premises licensees ignores important evidence about major suppliers, as well as the countless number of purchases occurring online and through packaged liquor stores. This is vital information as almost 80 per cent of alcohol consumed in Australia is sold at packaged liquor outlets.^{xv} By excluding this information the data is limited and not helpful in guiding research or developing evidence-based alcohol policy.

Despite the ineffectiveness of the Kings Cross alcohol sales data, lessons can be learnt from the project to help guide the implementation of standardised state-wide data collection.

Recommendation:

- ii. **That the NSW Government develop a report and publish the alcohol sales data that has been collected. This report should be used to guide the implementation of state-wide collection.**

3. The case for state-wide data collection

NSW is the only state or territory not collecting or committed to collecting state-wide data on alcohol sales. Alcohol sales data is the gold standard recommendation of WHO for measuring alcohol consumption within communities. ^{xvi} Self-reported survey data has been found to be incredibly inaccurate, accounting for less than 50 per cent of consumption. ^{xvii} Reliable estimates of alcohol consumption at the local level is crucial for monitoring, policy development and evaluation, targeting and program planning. ^{xviii} It is critical that all Australian states and territories, including NSW, gather consistent and reliable state-wide alcohol sales data.

Wholesale data collection

Prior to 1996, state-wide wholesale alcohol sales data collection was mandatory for all states and territories. ^{xix} Once collection became optional only the Northern Territory (NT), Queensland and Western Australia (WA) chose to continue collection. Legislation requiring the collection of wholesale data was reintroduced in the Australia Capital Territory (ACT) in July 2012, Victoria in July 2015 and Tasmania in September 2016. ^{xx} In November 2016 the South Australian (SA) Government committed to introducing similar collection methods. ^{xxi} This leaves NSW as the only state or territory not collecting or committed to collecting state-wide wholesale alcohol sales data (Table 1).

Table 1: Summary of state-wide alcohol sales data collection by jurisdiction

	Reported By	Frequency of Reporting
NSW	No state-wide data	No state-wide data
QLD	Wholesale licensees, liquor producers, wine producers and merchants	Annually
NT	Wholesalers	Quarterly
VIC	Wholesalers and producers (with small producers exempt)	Annually
WA	Wholesalers and producers	Annually
ACT	Off premise licensees who sell liquor by wholesale	Annually
TAS	Wholesalers and producers	Unknown
SA	Committed to collecting wholesale data	Unknown

Collection of alcohol sales data from all wholesale and producer liquor licence holders across NSW will allow for better per capita consumption estimates across the state. Such estimates will assist in identifying emerging trends to support evidence-based policy, regulation and service delivery, as well as provide an objective measure for evaluating alcohol policy initiatives. It will also assist policy makers to analyse trends and understand the magnitude of alcohol's impact. ^{xxii}

Collection of state-wide wholesale data will also enable NSW to participate in NDRI's National Alcohol Sales Data Project. The Project collects wholesale alcohol sales data from the majority of jurisdictions, and contains the most recognised, up-to-date and reliable source of information available in relation to alcohol sales in Australia. ^{xxiii} State-wide reporting by licensees should follow the recommendations of NDRI and the 2016 CAPR report. At a minimum, this should include annual reporting of

transaction-level sales data detailing type of alcohol, volume and price. ^{xxiv} The NSW Government should detail the findings and data in an annual report, which should be made publicly available.

It is critical that Liquor & Gaming NSW consider ways that alcohol sales data collection can reliably and accurately occur across NSW. When retail sales data to the public is unavailable, transaction level wholesale data to retailers acts as a good proxy. ^{xxv} As a first step, the NSW Government must broaden the scope of data collection to account for wholesalers and producers across NSW.

Recommendation

- i. **That the NSW Government collect state-wide wholesale and producer alcohol sales data at the transaction level detailing alcohol type, volume and cost as well as the purchasers' retail licence number.**
- ii. **That the NSW Government implement state-wide alcohol sales data reporting that allows it to participate in the National Alcohol Sales Data Project.**

Retail data collection

The WHO *International Guide for Monitoring Alcohol Consumption* states that retail sales data presents more logistical challenges but is the most accurate representation of per capita alcohol consumption. ^{xxvi} Retail sales data captures the moment alcohol is sold to the public and is the most timely and detailed record of alcohol consumption levels.

Despite retail sales being the most accurate representation of alcohol consumption, there is currently no representative data of retail liquor purchases in Australia. Alcohol sales data at the retail level is lacking globally and collection of such data would strengthen the NDRI project. ^{xxvii}

While the Kings Cross methods are thorough and comprehensive, the collection of this data lacks purpose. A clear policy rationale for collection of this data will allow for better understanding and compliance among licensees. NAAPA anticipates that Liquor & Gaming NSW will receive submissions from members of the alcohol industry asserting the abolition of alcohol sales data collection. The NSW Government must ensure that this does not happen and ensure that consideration is given to improving and strengthening data collection.

Streamlining reporting requirements needs to be considered. It has been indicated by some venues that the Kings Cross reporting is too onerous. However, the 2016 CAPR report indicated that some businesses already collect daily sales data for administrative or taxation purposes and others use software systems, which provide sales figures by the minute, thereby reducing the likely burden on businesses. ^{xxviii} An online database or recording system could streamline the collection and analysis of data.

Furthermore, concerns regarding commercial and privacy requirements can be addressed by limiting the public availability of data to geographical units, such as postcodes, thereby providing anonymity to individual venues whilst simultaneously providing detailed data for policy evaluation. Retail level data provides better real time information regarding consumption at a local level, as wholesale data can introduce a time lag, due to the increased possibility that the goods are not consumed in their year of purchase. ^{xxix} In order to gather the most informative and representative data, the NSW Government must consider less burdensome alternatives for collecting state-wide retail sales data.

Future NSW alcohol retail sales data collection methods should ensure that all licence types are incorporated, including online and packaged liquor sales.

The NSW Government must consider new methods for retail data collection in order to gather the most accurate information on alcohol consumption within NSW.

Recommendation

- iii. **That the NSW Government explores opportunities to make retail alcohol sales data reporting easier and implement these changes state-wide.**

Conclusions

Accurate and reliable collection of state-wide wholesale and retail alcohol sales data will enable NSW to pave the way for a national standard of alcohol sales data. By collecting and publishing this data consistently and in line with the National Alcohol Sales Data Project, the NSW Government can better shape evidence based policy, monitor consumption, target specific communities and better plan responses. These recommendations provided by NAAPA enable:

- Better comparisons between alcohol harm and consumption levels
- The implementation of more responsive alcohol policies
- The identification of problem areas
- Better responses through the planning and allocation of public resources
- Analyses of beverage specific consumption by area and time
- Proper evaluation of alcohol consumption related policies and targeted interventions

The current lack of state-wide data is impeding the licensing and planning processes, as the local geographical impacts from alcohol outlets cannot be accurately quantified. Alcohol is one of the leading risk factors for chronic illness. It is completely preventable and contributes to a significant proportion of the global burden of disease. Additionally, alcohol contributes to the social burden through numerous means of alcohol-related harm including reduced workforce productivity, public violence, traffic accidents and family and domestic violence.

If the NSW Government disregards the collection of reliable, accessible and quality state-wide alcohol sales data, they will be neglecting the countless social, economic and health impacts that alcohol consumption has on our community.

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Understanding alcohol sales data in Australia

February 2016

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About the Foundation for Alcohol Research and Education

The Foundation for Alcohol Research and Education (FARE) is an independent, not-for-profit organisation working to stop the harm caused by alcohol. Alcohol harm in Australia is significant. More than 5,500 lives are lost every year and more than 157,000 people are hospitalised making alcohol one of our nation's greatest preventative health challenges.

For over a decade, FARE has been working with communities, governments, health professionals and police across the country to stop alcohol harms by supporting world-leading research, raising public awareness and advocating for changes to alcohol policy. In that time FARE has helped more than 750 communities and organisations, and backed over 1,400 projects around Australia.

FARE is guided by the World Health Organization's *Global Strategy to Reduce the Harmful Use of Alcohol* for stopping alcohol harms through population-based strategies, problem directed policies, and direct interventions.

If you would like to contribute to FARE's important work, call us on (02) 6122 8600 or email info@fare.org.au.

About the Centre for Alcohol Policy Research

The Centre for Alcohol Policy Research (CAPR) is a world-class alcohol policy research institute, led by Professor Robin Room. The Centre, which receives funding from the Foundation for Alcohol Research and Education (FARE) and the La Trobe University, examines alcohol-related harms and the effectiveness of alcohol-related policies.

CAPR not only contributes to policy discussions in Australia but also contributes to international studies of significance for the World Health Organization. An example of its international work is the [GENACIS project](#), which examines gender alcohol and culture in more than 40 countries.

The Centre has also undertaken a pioneering study, [The range and magnitude of alcohol's harm to others](#), that is the cost of alcohol-related harms on people other than the drinker, otherwise referred to as third party harms. Results from the study were also included in the World Health Organization's [Global Status Report on Alcohol and Health 2011](#), and WHO is using the study as a model for such studies globally.

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Executive summary

The aim of this document is to highlight the importance of collecting alcohol sales data, to recognise the absence of uniform and effective data collection at present, and to discuss the ideal approach to measuring alcohol consumption at the state and territory level in Australia. The advantages and disadvantages of several methods of collecting consumption data are discussed, including what is already being collected by different jurisdictions.

In consideration of recommendations from academics in the field and the World Health Organization (WHO), wholesale sales data is recommended as the most accurate and efficient data collection on consumption levels at the sub-national level. Our review of existing practice highlights that while several Australian jurisdictions collect these data, practices vary substantially. Governments should be asking wholesalers and producers to disclose specific information regarding the sales of alcohol to them in order to best estimate per capita alcohol consumption at state and local levels. Such actions will enable the analysis of alcohol consumption across different regions, which supports the development and effective evaluation of public health policy measures that can be tailored to different regions and population groups.

Introduction

Measuring alcohol consumption in Australia is an issue of ongoing debate, with a mix of survey, sales and harms data currently being used to map trends. This leads to ongoing confusion as to current trends, with different studies producing increasing^{1,2} and decreasing trends.^{3,4} Governments and organisations have been implementing programs in a number of guises to quell harm and raise awareness of the risks involved with drinking for both individuals and others. From alcohol management plans in remote areas and changes to liquor licensing laws in New South Wales, to campaigns (such as VicHealth's 'No Excuse Needed' and 'Name That Point' campaigns) and programs (such as Hello Sunday Morning) implemented to target the embedded drinking culture in Australia. Across the full range of interventions, the collection and reporting of accurate per capita consumption data is crucial to enable impact monitoring of programs and to better track shifts in consumption and assess if these changes are isolated to certain regions or points in time. Timely reporting of the alcohol consumption of Australians is vital for informing the development and evaluation of strong, evidence-based alcohol policy designed to minimise the harmful effects of alcohol.

Alcohol consumption is influenced by many factors, including legislation, enforcement, availability, social norms and attitudes, and individual factors, and when considering indicators for measuring consumption it is important to consider the validity, reliability and availability of the chosen data source.⁵ The most recent *National Alcohol Strategy 2006-2009* stated that a key action required to support the strategy was to improve data collection by implementing a "nationally consistent approach to the collection of wholesale sales data".⁶ In 2007, the Commonwealth Government endorsed this concept by funding the National Alcohol Sales Data Project (NASDP) jointly developed and managed by the Western Australia Drug and Alcohol Office and the National Drug Research Institute (NDRI) at Curtin University. The NASDP has demonstrated the potential value, at both policy and practice levels, of standardised collection and analysis of alcohol sales data.⁷ While several jurisdictions currently collect data, variance in the type of data reported and the absence of Victorian, South Australian and Tasmanian data limits both the scope of analyses and conclusions that can be

drawn from the data. A uniform approach to the collection of alcohol consumption data across all Australian jurisdictions is therefore necessary, and the below discussion outlines the possible approaches to overcoming this barrier to quality surveillance of alcohol consumption.

Alcohol sales data

Alcohol sales data are information collected from either retailers or wholesalers regarding the volume of specific alcoholic beverage types sold; to the public (in the case of retailers) or to retailers (for wholesale sales data). The WHO recognises alcohol sales data as the gold standard method for collecting per capita consumption, especially in countries such as Australia that have limited illicit or home produced alcohol.⁸ Retail sales data provides the most detailed and timely records of consumption as they are captured at the moment that alcohol is sold to the public (although some alcohol may still be sold and not consumed in a certain period), while wholesale sales data are likely to be more influenced by time lags and stockpiling (as the data are recorded when alcohol is sold to the retailers, rather than to the eventual consumer).

Set against this slightly increased risk of lagged data, is the practicality of governments collecting data from businesses. In Victoria, for example, there are around 1,200 businesses that sell wholesale alcohol (including wineries, wholesalers, and importers) compared with 18,000 businesses that sell alcohol directly to consumers. This trade-off has meant that in most Australian jurisdictions where sales data have been collected, the focus has been on collecting data from wholesalers.

Alcohol sales data is presently only collected by the state and territory governments of the Australian Capital Territory, Western Australia, Victoria, Queensland and the Northern Territory, albeit each with different reporting requirements. New South Wales collects detailed sales data from licensees in the Kings Cross precinct, but does not collect any state-level data. Tasmania will commence the collection of alcohol sales data in 2016 and South Australia does not currently collect data.

Table 1 and the accompanying text below summarises the progress of data collection in each state and territory.

Table 1. Summary of sales data collection by Australian jurisdiction.

	Northern Territory	Queensland	Western Australia	Australian Capital Territory	Victoria
Frequency of reporting	Quarterly	Annually	Annually	Annually	Annually
Reported by	Wholesalers	Liquor producers, wholesale licensees, and wine producers and merchants	Wholesalers and producers	Off premise licensees who sell liquor by wholesale	Wholesalers and producers (with small producers exempted)
Report to	Northern Territory Department of Justice	Queensland Office of Liquor and Gaming	Western Australia Drug and Alcohol Office	Commissioner of the Office of Regulatory Services and the Chief Health Officer	Victorian Commission for Gambling and Liquor Regulation
Beverages required to report on	Beer (by strength) Wine Spirits (standard and premixed) Cider	Beer (by strength) Wine (fortified and table, by container type) Spirits (standard and premixed) Cider Alcoholic sodas and mead	Beer (by strength) Wine Spirits	Beer (by strength) Wine Spirits (standard and premixed)	Beer (by strength) Wine (fortified and table, by container type) Spirits (standard and premixed) Cider

New South Wales

The New South Wales Office of Liquor, Gaming and Racing mandated in clause 53O⁹ of the *Liquor Regulation 2008* that licensees in the Kings Cross precinct must record and report the amount of liquor sold daily. Venues deemed as high risk (there are currently 35 venues listed under clause 53R¹⁰) are mandated to report hourly sales in their quarterly report. The regulation regarding the collection of retail sales data in the Kings Cross precinct was amended in 2014; prior to this all Kings Cross licensees had to report hourly data. While some may argue that such precise reporting may be onerous for businesses, through consultation, businesses have reported that such data is often already collected for business administration or taxation purposes. Moreover software systems for businesses like those in the alcohol industry (such as Harbortouch or Ordermate) boast the ability to provide sales figures by the minute, further easing the likely burden on businesses. While the New South Wales data are far more comprehensive than data available elsewhere, they are only collected for a specific area. It is unlikely that a detailed retail-level scheme such as that currently utilised in Kings Cross would be practical state-wide, but it is critical that New South Wales consider how to broaden the scope of their data collection to provide estimates for the whole state. This may entail, for example, converting to a wholesale and New South Wales-wide system that aligns better with existing data collected from Western Australia, Queensland and the Northern Territory.

Victoria

The Victorian Commission for Gambling and Liquor Regulation have adopted regulations whereby wholesale licensees will be obliged to record and report on sales to licensed outlets and retailers. These reporting requirements apply to wine and beer producers, pre-retail and renewable limited licensees from 1 July 2015. Licensees will report on the type, volume and cost of alcohol supplied, as well as additional information including postcode and licence number of the retailer/buyer. Beer sales will be reported by strength and by the capacity of the container being sold (fewer than or equal to 48 litres, versus more than 48 litres). Cider and ready-to-drink (RTD) spirits will be reported independently from beer, spirit and wine sales. Small business exemptions for small producers have been included based on the amount of alcohol produced (fewer than 8,750 litres of spirits, 28,500 litres of wine, 100,000 litres of cider and 100,000 litres of beer annually). Calculations reported in the consultation paper¹¹ suggest that these exemptions will affect fewer than one per cent of the total alcohol market, and thus will not be detrimental to the data collection. Data will be reported to the NASDP.

Queensland

The Queensland Office of Liquor and Gaming Regulation maintained the reporting of annual liquor sales returns by producer/wholesaler, wine producer and wine merchant licensees, despite most reporting being abolished in 1996 when the High Court declared the annual liquor licence fees unconstitutional. The filing of returns collects information on the licence and site type of the purchaser, as well as volume of alcohol purchased from wholesalers by beverage type.¹² It is noteworthy that the Queensland licensing system requires off-site bottle shop licensees to first hold a hotel licence. The primary hotel licensee, which is usually the licence recorded in wholesale reports, may hold up to three off-site licences which may be geographically distinct from the hotel licence. The above mentioned ambiguity somewhat compromises the data collection, especially when the off-site licences are in different local government areas to the primary hotel licence.¹³ The Queensland data is otherwise a good example of data collection both in terms of the information collected and ease of reporting with comprehensive spreadsheets available to licensees. The Queensland data has been involved in the NASDP since it begun and has been published in the associated reports.

South Australia

The Office of Liquor and Gaming Commissioner is in the Consumer and Business Services department of the Government of South Australia and the *Liquor Licensing Act 1997* does not currently mandate the collection of alcohol sales data. The Social Development Committee of the Parliament of South Australia submitted an inquiry into the sale and consumption of alcohol to the Legislative Council in 2013. The final report states “there is provision in the Liquor Licensing Act 1997 to require the collection of alcohol sales data”.¹⁴ The inquiry had submissions from the Aboriginal Legal Rights Movement, The Law Society of South Australia and the Australian Drug Foundation all endorsing, along with the Committee, the introduction of mandatory reporting of alcohol sales data. It seems, from the final report, that the lack of a “nationally consistent approach” is delaying the uptake of these recommendations.

Western Australia

The Western Australia *Liquor Control Act 1988* stipulates in Section 145 and 146 that wholesale and producer licensees must record all transactions involving the sale or purchase of alcohol and lodge their return annually. In 2012, in response to growing public interest and the submission of the report *Alcohol: Reducing the harm and curbing the culture of excess*¹⁵ to the Legislative Assembly, an independent review committee was established to review the Act. NDRI and the McCusker Centre for Action on Alcohol and Youth both submitted that pre-mixed and standard spirits should be reported separately and that data on cider and cask wine sales should be included in a quarterly lodging of returns.¹⁶ Wider availability of the data to independent researchers, collection of retail sales data, and the need for a more user-friendly reporting system were also issues raised in submissions. Concerns relating to inaccurate calculation of volume due to interstate stock movements and sales direct to consumers were also raised. The resulting technical amendments recommended by the Committee included that the Minister should: monitor the outcomes of the NASDP with a view to improving the accuracy of the data (Recommendation 137); ensure that sales data in relation to cider is collected (Recommendation 138); and provide licensees access to a functional online system to lodge their returns electronically (Recommendation 139). The West Australian data has been provided to the NASDP and included in several reports published by NDRI.

Tasmania

The Department of Treasury and Finance in Tasmania does not currently mandate licensees to report alcohol sales data. In 2013 the Liquor and Gaming branch conducted a review of the *Liquor Licensing Act 1990* which resulted in 24 proposed amendments to the Act, two of which related to data collection. This included amendments to the Act to allow the collection of alcohol sales data from wholesale and producer liquor licence holders and the participation of Tasmania in the NASDP.¹⁷ As a result of this review, an Amendment Bill passed the Tasmanian Parliament in December 2015 which mandated the collection of alcohol sales data. The details on how this data will be collected and reported are currently being developed by the Department of Treasury and Finance with data collection likely to commence in July 2016.

Northern Territory

The Northern Territory *Liquor Act 1978* has mandated under Section 114 that the Licensing, Regulation and Alcohol Strategy division of the Northern Territory Department of Business collect quarterly returns of alcohol sales. Each wholesale licensee must provide details of the purchasing licensee/retailer, the volume of liquor sold (itemised by wine cask, wine bottled, wine fortified, cider, standard spirits, spirits mixed drinks, and full, mid and low strength beer) and the total cost. The total cost is categorised into full, mid and low strength alcohol groups, the form specifies which beverage types should be reported under each of the three strengths, resulting in cumulated total cost by strength for the reporting period. The Northern Territory data has been involved in the NASDP since it begun and has been published in the associated reports. The filed returns could be supplemented by additional disaggregation by date and with the total cost itemised by the beverage types as is already reported for volume purchased.

Australian Capital Territory

Under the Australian Capital Territory's *Liquor Regulation 2010* (Schedule 1 Section 1.19 and 1.20) sales data is collected from off premise licensees, asking in two separate forms for licensees to provide a) the volume of wholesale alcohol sold and b) the supplier name and address and gross price paid for the liquor from that supplier. While the first form asks about volume of different beverage types the form is not itemised by each purchaser/retailer to allow geographical context to where the alcohol is most likely to be consumed and the second, which tracks the location of suppliers, does not itemise by drink type, volume or date. Thus the forms used by the Australian Capital Territory omit the ability to look at local consumption levels. Presently the data collected by the Australian Capital Territory Government is not included in the NASDP.

Implications

Recognising the implications of the different methods of collection is important. The failure of reporting requirements to include cider in Western Australia and the Australian Capital Territory neglects the growth in cider consumption¹⁸ in Australia, and the NASDP reported this as a limitation. Similarly, the project reported that the data has been useful for looking into the impact of the 'alcopops' tax, however Western Australia's inability to disaggregate standard spirit consumption from pre-mixed consumption also limited the scope of analyses.¹⁹ The NASDP report highlighted that analysing ready-to-drink beverages and cider independently can facilitate a better understanding of whether population groups are substituting products in response to alcohol policy changes.

Like other measures, the use of wholesale sales data for the estimation of consumption has limitations. At small geographical levels, fluxes in population size due to tourism, student migration and underage consumption impact the accuracy of the estimated adult population, which is used to calculate per capita consumption. However, researchers in Scotland have shown that this is likely to have very little impact on the validity of the data.²⁰ The NASDP examined two measures of population size and found that use of the estimated service population (ESP) provided the most accurate measure for calculating regional estimates.²¹ Estimated service population accounts for tourists, seasonal workers, students, armed forces personnel and others, whereas estimated residential population (ERP) does not. Spills, wastage, use in cooking and stockpiling have been recognised as virtually unquantifiable measures that are likely to have minimal impact on the validity of the data. Issues related to unrecorded alcohol and, particularly, Internet purchases are also difficult to quantify, and should be monitored to help gauge their impact on consumption estimates.²²

Wholesale data is preferred over retail sales data largely for ease of collection. While large wholesalers that service a majority of the market dominate the wholesale liquor market, retailers are many and varied, so that tracking and accountability issues may be more problematic. Moreover, as some states and territories in Australia are already collecting wholesale sales data, it is a more efficient option.

Other/existing data sources

While the Australia Bureau of Statistics collects national data based on import clearance, excise and domestic alcohol sales enabling national estimates, this does not enable estimation of regional variances in consumption which are both present and important. Initiatives targeting the reduction in per capita consumption will be most effective if developed within the context of local data; thus collection of regional data is crucial.

The National Drug Strategy Household Survey (conducted every three years by the Australian Institute of Health and Welfare) and the Australian Health Survey (conducted every five years by the Australian Bureau of Statistics) enable the calculation of location-based estimates of per capita sales and consumption. While national survey data can provide information on socio-demographics and patterns of drinking at an individual level, it is well documented that survey data is not considered an accurate source for the estimation of per capita consumption of alcohol due to the gross underestimation of alcohol consumption (WHO guide for monitoring alcohol consumption). Self-reported consumption data from such surveys rarely account for even 50 per cent of known alcohol sales,²³ a statistic that should not be deemed acceptable when other more accurate means of collecting consumption data exist. Furthermore, survey data is limited by poor response rates and other biases that hinder generalisation of the data, and by its currency.²⁴

Modelling market research and survey data has been suggested as an option. While this method has the potential to provide detailed information about sales transactions and consumer demographics, triangulation will not overcome the existing limitations of survey data or the inability to disaggregate alcohol excise and duty clearances by jurisdiction. Moreover, timelines of data and survey release dates may result in considerable lag time before the publication of results, and market research data is likely to be expensive.

Recommendations

Reliable estimates of alcohol consumption at sub-national geographical levels are critical for monitoring, policy evaluation and program development and targeting. Therefore, it is crucial that all states and territories in Australia collect reliable and consistent data on alcohol sales. Given the logistical challenges involved in collecting detailed data direct from retailers, a consistent system of data collection from wholesalers and producers is the optimal path to nationally consistent estimates of sales data. Collecting detailed data provides more flexibility than simply collecting annual totals of sales to particular regions, and concerns about commercial-in-confidence data can be managed when data are being published or released. Therefore, we recommend a system that collects:

- Transaction-level data on sales from wholesalers and producers to retailers who sell alcohol to the public. This level of detail will allow for monthly, quarterly or annual estimates of sales as appropriate.
- Retail outlet-level data, with standard public reporting of the data limited to appropriate geographical units (such as postcode), leaving open the possibility that more detailed data can be utilised for specific policy-relevant purposes.
- Data on price and volume should be included for each transaction.

Importantly, detailed beverage-specific data are required to fully understand patterns and trends in Australian drinking. Thus, an ideal data system should collect sales data broken down by:

- beer (distinguishing between low, mid and full strength beers)
- wine (distinguished by volume [bottled vs bulk] and strength [table vs fortified] of purchased wine)
- spirits (distinguishing between standard spirits [inclusive of liqueurs and aperitifs] and premixed ready-to-drink spirits)
- cider and other brewed products (distinguishing between high alcohol and regular products).

A proposed template (based on the current Queensland template) is included below.

Table 2. Transaction-level template for recording wholesale alcohol sales data

		\$	Vol	Retail outlet licence number	Date
BEER	Heavy				
	Light				
	Medium				
CIDER	High alcohol				
	Regular				
BOTTLED WINE	Table wine				
	Fortified				
CASK/BULK WINE	Table wine				
	Fortified				
SPIRITS	Regular				
	Pre-mixed				
Alcoholic sodas					

Standardised templates, in an accessible file format (such as CSV which is used across Microsoft Excel, QuickBooks, EzyWine, MYOB and other software) should be generated and provided online for licensees to access. Reports can then be submitted via email or post to the relevant government department.

It is recommended that all states and territories should mandate, at a minimum, annual reporting of alcohol sales data at the Local Government Area level, but that more detailed data (as described above) is collected and made available for relevant research, evaluation and policy projects.

To ensure consistency and comparability, funding for the NASDP should continue or another entity (such as the Australian Bureau of Statistics) should be resourced to receive, collate and report on jurisdictional data, including calculating and mapping per capita consumption for each area. An annual report should detail the findings and the data should be made publicly available for access by policy makers and researchers²⁵. Conditions and agreements should facilitate access to interested parties beyond the Minister and department employees to optimise the use of the data. Estimates generated from the data should be made available to the public in accordance with good information dissemination and transparency practices.

Conclusion

Collecting and publishing wholesale sales data more consistently and across all Australian states and territories, would benefit governments and communities by providing data that enables:

- analyses of beverage specific consumption by area and time
- comparison between alcohol consumption and alcohol-related harm data
- development of alcohol policies that will be responsive
- planning and allocation of public resources to respond to community consumption
- impact evaluations of policies or interventions targeting alcohol consumption.

The absence of consistent data collection across jurisdictions provides a range of challenges for policy makers. The Table 3 assesses each Australian state and territory data collection against the recommendations made in this report. This lack of consistency again shows the need for coordinated collection across the country.

Table 3. State and territory state-wide alcohol sales data collection assessed against recommendations

	WA	VIC	QLD	ACT	NT	NSW ^a	SA ^b	TAS ^c
Transaction-level data on sales from wholesalers and producers to retailers who sell alcohol to the public.	✓	✓	✓	✓	x	x	x	x
Retail outlet-level data, with standard public reporting of the data limited to appropriate geographical units (such as postcode).	x	x	x	x	✓	x	x	x
Data on price and volume should be included for each transaction.	✓	✓	✓	✓	✓	x	x	x
Detailed beverage-specific data: • beer (low, mid and full strength beers) • wine (volume [bottled vs bulk] and strength [table vs fortified] of purchased wine) • spirits (standard spirits [inclusive of liqueurs and aperitifs] and premixed ready-to-drink spirits) • cider and other brewed products (n high alcohol and regular products).	x (does not distinguish between cask and bottled wine and does not collect cider)	✓	✓	x (does not distinguish between cask and bottled wine and does not collect cider)	x (does not distinguish between cask and bottled wine)	x	x	x

^a New South Wales does not collect state-wide alcohol sales data. Data is only collected in Kings Cross, Sydney.

^b South Australia does not collect state-wide alcohol sales data.

^c An Amendment Bill passed Tasmanian Parliament in December 2015 that included the collection of alcohol sales data. The Department of Treasury is currently drafting regulations for the collection of sales data and is likely to start in July 2016.

The current lack of adequately detailed and reliable data is hindering licensing and planning processes in local governments, as the impact from alcohol outlets in a given area cannot be quantified. Local level sales data could provide crucial evidence to enable decision making and vastly improve the quality of evidence brought to bear in planning and liquor licensing hearings.

Alcohol consumption is a leading risk factor for many prevalent non-communicable diseases and contributes a significant social burden through its role in domestic and public violence, reduced workforce productivity, and traffic accidents, among other problems. To overlook the collection of quality consumption data is to neglect the significance of the social and health impacts that risky alcohol consumption is having on our communities. The implementation of a nationally standardised recording system that demonstrates strong government commitment to reducing alcohol-related harm through the provision of a tool that can track trends and evaluate policy at local, state and national levels is vital. A big first step is to implement a wholesale alcohol sales data monitoring system that will help us generate strong evidence-based alcohol policy into the future.

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