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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*. Cancer Council NSW (CCNSW) endorses the NSW ACT Alcohol Policy Alliance's (NAAPA) submission to this review and make these additional following observations.

Cancer Council NSW (CCNSW) focuses on cancer research, prevention programs, advocacy, and providing information and support for people affected by cancer. CCNSW has a series of evidence-based recommendations aimed at preventing cancer at the population level, and one of these includes limiting alcohol consumption to reduce alcohol related cancers.

Alcohol-related harm

The regulation of the sale, promotion and service of alcohol is necessarily an issue of health and community safety. In NSW, alcohol is responsible for 13,624 emergency department presentations, 53,924 hospitalisations and 1,300 deaths every year.<sup>1</sup> From a cancer perspective, alcohol is proven to increase the risk of seven different types of cancer including mouth, throat, oesophagus, stomach, bowel, liver and breast.<sup>2</sup> An estimated 3,208 cancers (2.8% of all cancers) occurring in Australian adults in 2010 could be attributed to alcohol consumption.<sup>3</sup>

Body fatness is also a significant risk factor for cancer<sup>2</sup>. Alcoholic drinks are generally high in kilojoules and low in nutritional value, especially when mixed with sugar-sweetened mixer drinks. If alcohol is consumed in addition to normal dietary intake, body fatness can result. Alcohol may contribute indirectly to the diseases associated with excess body fatness, including cancers of the bowel, kidney, pancreas, liver, oesophagus, endometrium and breast (in post-menopausal women).<sup>2</sup>

The National Health and Medical Research Council (NHMRC) Australian Guidelines to Reduce Health Risks from Drinking Alcohol state:

- For healthy men and women, drinking no more than two standard drinks on any day reduces the lifetime risk of harm from alcohol-related disease or injury
- For healthy men and women, drinking no more than four standard drinks on a single occasion reduces the risk of alcohol-related injury arising from that occasion.<sup>4</sup>

Health Stats NSW data shows 32.4% of the total NSW adult population and 46% of 16–24 year olds drink alcohol at rates that increase their long-term risk of harm.<sup>5</sup>

Just under one quarter of all adults drank more than 4 standard drinks on a single occasion in the last 4 weeks, which placed them at a higher immediate risk of harm and harmful drinking is highest for people aged 16-24 years.<sup>6</sup>

Awareness of the NHMRC drinking guidelines is low with less than 5% of the population correctly estimating the low-risk drinking guidelines.<sup>7</sup>

Alcohol abuse costs the NSW government more than \$1 billion every year. This does not include the costs of treatment of chronic conditions linked to alcohol use.<sup>8</sup> The NSW Ministry of Health cites alcohol use as one of the leading causes of preventable disease in NSW. They have a priority goal to reduce alcohol-related harm in NSW.<sup>9</sup>

#### Alcohol Advertising Prohibition Bill 2015

In 2017, CCNSW made a submission to, and appeared before, the NSW Parliamentary Committee inquiring into the Alcohol Advertising Prohibition Bill 2015. CCNSW were pleased to see the recommendations of that enquiry were:

- a. Consider the issue of discounting promotions for alcoholic beverages on shopper dockets;
- b. Appropriate restrictions and/or exclusions on alcohol advertising on all government infrastructure and property, particularly advertising to which children and young people are exposed; and
- c. A strategy to phase out alcohol sponsorship in sport over time, in a way that ensures sporting clubs and organisations are not financially disadvantaged.

The review of the Liquor Promotion Guidelines provides an opportunity for these recommendations to be implemented.

#### Liquor Promotions

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.<sup>10</sup> The promotion of alcohol contributes to the normalisation of its use and reinforces the harmful drinking culture that currently exists in Australia.<sup>11</sup> The Liquor

Promotion Guidelines are therefore an essential plank in the NSW Government's public health infrastructure.

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.<sup>12-14</sup> This is particularly concerning as young people experience disproportionate levels of alcohol-related harms. Young people's exposure 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.

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 eighty per cent of all alcohol purchased in Australia).<sup>15</sup>

The community will support action to address alcohol promotions. Recent polling shows that NSW adults believe that:<sup>16</sup>

- 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).

#### Inconsistent state government action

A double standard exists in NSW where the state government receives income from the advertising of alcohol on government property at the same time as the Ministry of Health spends money on hospital presentations related to excess alcohol intake and reducing problem drinking and the Police Force bears the cost of managing alcohol related anti-social behaviour and traffic accidents.

Other state governments have identified this major inconsistency and have moved to restrict the advertising of alcohol on government property. The Western Australian government have now stopped alcohol advertising on train infrastructure, while it will be phased out from buses in March 2019. The ACT government have already removed alcohol advertising from public transport and the South Australian government intend to phase out alcohol advertising on public transport vehicles.

### Influence of the alcohol industry

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. CCNSW 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, CCNSW 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 docketts 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. We would be happy to provide further information on the issues raised in this submission. Please contact Wendy Watson, Acting Nutrition Unit Manager, on (02) 9334 1467 or at [wendyw@nswcc.org.au](mailto:wendyw@nswcc.org.au)

Yours sincerely



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