



19 November 2015

Mr Darren Button
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Health Outcomes International
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Dear Mr Button,

Hobsons Bay City Council Submission: National Alcohol Strategy Development Discussion Paper

Hobsons Bay City Council welcomes the opportunity to respond to the National Alcohol Strategy Development Discussion Paper.

Council supports the broad purpose and function of a National Alcohol Strategy however this also needs to include leadership from the Commonwealth in relation to the identification and implementation of actions addressing the underlying issues (social determinants of health) of alcohol misuse and the elements of harm minimisation (supply, demand, harms).

The attached submission outlines the key issues for Hobsons Bay, along with a number of practical suggestions for the Commonwealth Government. We look forward to the further development of the strategy.

If you would like to discuss this submission further, please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmccclusky@hobsonsbay.vic.gov.au

Yours sincerely,

Natalie Walker
Director Strategic Development



Hobsons Bay City Council's Submission National Alcohol Strategy Development Discussion Paper

Hobsons Bay City Council is situated on the Port Phillip Bay, approximately seven to 20 kilometres south west of the Melbourne's Central Business District (CBD). The current population is estimated to be around 90,000 people.

Alcohol is a part of the Australian culture for many people. For most, drinking is associated with socialisation and relaxation, however there are risks associated with alcohol consumption with some groups more at risk than others. Key groups include young people and young adults, older adults (70+ years), Aboriginal and Torres Strait Islanders, pregnant women, trade and unskilled workers, those with mental health issues, and some Culturally and Linguistically Diverse (CALD) communities.

In addition, the health related impacts of alcohol consumption disproportionately affect disadvantaged groups, possibly due to compounding factors of other health issues and limited access to resources such as appropriate housing, health care, transport, employment and education.

Local government's role

Victorian councils have a legislative requirement to protect and promote the health and wellbeing of the local community under the *Public Health and Wellbeing Act 2008*, the *Planning and Environment Act 1987*, and the *Local Government Act 1989*.

Hobsons Bay City Council's Community Health and Wellbeing Plan 2013-17 provides further support with a vision of:

Valuing the wellbeing of our people and our place, now and into the future: A safe, clean, accessible and connected municipality, which values diversity, protects its heritage and environment, fosters a strong sense of community and provides opportunities to achieve the best possible health and wellbeing. A place that people are proud to call home.

Council has a range of responsibilities in relation to alcohol, including being the responsible authority under the *Planning and Environment Act 1987*, and assessing planning permit applications for licensed premises. In addition, Council can influence the impacts of alcohol related harm in the community through other legislative powers, including controlling the use of alcohol in public places and through its role as a public land manager. Within the current state legislation however, councils are restrained especially in relation to ensuring the social impacts of liquor are equally considered when applications are contested.

In addition to legislation, councils can have a direct or indirect influence in minimising the harms associated with alcohol through their broader roles as a planner, resource provider, service provider, partner and broker, advocate and supporter, and community capacity builder.



Key elements which need to be included in the National Alcohol Strategy (NAS)

It is pleasing to see that the National Alcohol Strategy will take a harm minimisation approach. The strategy needs to articulate all elements of this (supply, demand, harms) and how the Commonwealth Government is going to address these issues. It also needs to take a holistic and population health approach, identifying and addressing the underlying issues (social determinants of health) of alcohol misuse.

Feedback on specific discussion paper questions are below.

Is this an appropriate goal for the NAS? If not, what should be the main goal?

As indicated in the discussion paper, within the overarching goal a framework and actions will be developed to be implemented by a range of stakeholders (including all levels of local government). It is important that the Commonwealth actions be included in the framework, as it also has a key role to play. In order for these actions to be implemented stakeholders will need to be appropriately resourced. Local government in Victoria is facing rate capping next financial year which could have potential impact on available resources and its capacity to increase its involvement around this issue.

Is a five year timeframe adequate, or should a longer period be considered such as ten years?

Given this is a changing space, a five year timeframe allows the policy to be reviewed and updated as best practice and new frameworks are strengthened. In addition it allows for the response to changing community needs. It is recommended however that the plan be regularly monitored and evaluated to ensure actions are appropriate.

Are the guiding principles appropriate and are there other principles that should underpin this NAS?

The guiding principles also need to include harm minimisation acknowledging all elements of this (supply, demand, harms) as well as taking a holistic and population health approach, identifying and addressing the underlying issues (social determinants of health) of alcohol misuse.

What are the key challenges to address going forward in reducing harms from alcohol in the future?

Key challenges, particularly for local government include: managing the cumulative impact and social impacts of packaged liquor given the current gaps within the legislation, the increasing access to purchasing of alcohol online, the need to address the advertising of alcohol at social events (particularly those where young people are present e.g. sporting events), and the increase of non-alcohol events and social change.

Are there new stakeholders or industries that should be involved?

To impact the social determinants of alcohol a broad range of Commonwealth and state departments should be involved, including those that are responsible for transport, sport and recreation, arts and events, education and employment, community infrastructure, youth, and community inclusion. In addition key research



bodies such as VicHealth and the Alcohol Policy Coalition can provide some key directions and learnings.

What areas of focus need to be addressed in evidence-based policy?

Currently there are key gaps within the research in relation to the amount of alcohol being sold both wholesale and retail at a local government level, and the cumulative impact of packaged liquor (especially by floor size e.g. big box liquor outlets). The Commonwealth Government should be supporting this research and data collection to aid in future planning and mitigation of harms.

Are there other population groups that should be prioritised?

The current population groups identified should also include trade and unskilled workers. It should also be acknowledged that the health related impacts of alcohol consumption disproportionately affect disadvantaged groups. This is possibly due to compounding factors of other health issues and limited access to resources such as appropriate housing, health care, transport, employment and education, therefore it is key that a holistic approach is taken.

Other areas that should be prioritised in the NAS?

Other areas that should be priorities within the NAS include:

Commonwealth to provide leadership in relation to the accessibility of online sales of alcohol

Online packaged liquor sales are growing rapidly, increasing the accessibility of alcohol in communities. As a result, land use planning may have a decreasing influence on alcohol related harms particularly in domestic settings in the coming decade. Accessibility of alcohol via online methods needs to be reviewed to ensure harms are minimised.

Commonwealth to provide leadership in relation to alcohol advertising

There is clear research indicating the link between alcohol advertising exposure and the uptake of alcohol use in young people. The Commonwealth Government needs to take a stance to restrict alcohol advertising from places and times where children and young people may be exposed as well as support a sustained social marketing campaign about responsible drinking.

Support research and evidence

As mentioned earlier, there are currently key gaps within the research in relation to the amount of alcohol being sold both wholesale and retail at a local government level, and the cumulative impact of packaged liquor (especially by floor size e.g. big box liquor outlets). The Commonwealth Government should prioritise this research and data collection to aid in future planning and mitigation of harms.