



9 February 2018

Department of Health
GPO Box 9848
Canberra ACT 2601
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Ask for: Kathleen McClusky
Phone: 9932 1004
Our Ref: A2794705

Dear Sir/Madam,

Draft National Alcohol Strategy 2018-2026

Hobsons Bay City Council welcomes the opportunity to provide feedback on the Draft National Alcohol Strategy 2018-2026.

While alcohol plays a legitimate role in contributing to the vibrancy of Hobsons Bay's social life and local economy, it also has the potential to detrimentally affect community health and wellbeing. This is recognised in the Council's formally adopted 'Minimising the Harm of Alcohol Policy Statement 2016.'

Please find attached Council's submission on the Draft National Alcohol Strategy 2018-2026. We look forward to the finalised strategy and continuing to work with all levels of government and other stakeholders to reduce alcohol-related harm in Hobsons Bay.

If you have any questions regarding this submission please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmccclusky@hobsonsbay.vic.gov.au

Yours sincerely,

Chris Eddy
Chief Executive Officer



Draft National Alcohol Strategy 2018-2026

Hobsons Bay City Council's submission

Background

The City of Hobsons Bay covers an area of 65 square kilometres, extending seven to 20 kilometres south-west of Melbourne's central business district. The current population is estimated to be just over 95,000 people.

Hobsons Bay is the ninth most disadvantaged municipality in Metropolitan Melbourne, with a SEIFA index score of 1,001.7. Additionally, some neighbourhoods within Hobsons Bay - Laverton (875.6), Altona North (910.3) and Brooklyn (946.8) - are ranked in the bottom quartile of Australian neighbourhoods. Data shows that Hobsons Bay is on par with the Victorian average for a number of alcohol-related indicators such as 'at risk of short term harm each month' and 'attitudes to alcohol culture'.¹

In 2016, Council adopted the Minimising the Harm of Alcohol Policy Statement. The policy statement aims to mitigate the negative impacts of alcohol (particularly in relation to packaged liquor outlets and late night venues) by adopting a harm minimisation approach, focussed on demand, supply and harm reduction. Council is encouraged that the National Alcohol Strategy 2018-2026 (the Strategy) adopts this framework.

Benefits of the Strategy

It is considered that the use of the Strategy as a national framework (underpinned by a national governance structure) is appropriate, as it provides a critical forum to influence policy at all levels of government. It is also encouraging to note that a 10 per cent target has been set for the reduction in harmful alcohol consumption, which will complement VicHealth's ten-year goal of 200,000 Victorians drinking less alcohol.² Other benefits include the Strategy's focus on disproportionate levels of harm experienced by different population groups, and clear recognition of the need to strengthen regulation of alcohol advertising and promotions.

Recommendations

The following suggests changes to improve the effectiveness of the strategy.

Access and availability

While the Strategy outlines a number of opportunities for action to strengthen controls on access and availability (under objective 2.1), stronger policy direction is required to effectively reduce harm. For example, under the current Victorian regulatory framework, there has been limited weighting given to the consideration of potential harms when reviewing new liquor licences (e.g. cumulative impacts). This occurs despite a growing body of research linking harms to packaged liquor outlet density (e.g. hospitalisations for assault,

¹ VicHealth (2016a) *VicHealth Indicators Survey 2015 Results: Hobsons Bay LGA Profile*, Melbourne.

² VicHealth (2016b) *VicHealth Alcohol Strategy 2016-19*, Melbourne.



police reporting of family violence) and trading hours (e.g. assaults, alcohol-related hospitalisations among adolescents and young adults).³

Additionally, local government, communities and other stakeholders have been largely unsuccessful in opposing potentially harmful liquor licence applications which are not wanted within their community.⁴ The Strategy has the opportunity to provide stronger policy direction to investigate how state-based regulatory frameworks can more effectively assess the harms associated with liquor applications as well as how they consider the views of these community groups.

Recommendation: that the Strategy includes ‘investigating opportunities for legislative and regulatory reform as an opportunity for action, as well as continuing to support research in relation to liquor licences and harm minimisation.

Demand reduction

Another area where the Strategy should be strengthened is through an increased emphasis on demand reduction by addressing underlying cultural and social norms. As discussed in the Strategy, cultural and social norms around alcohol are strong in Australia and contribute to increased risk of serious harm and development of harmful drinking patterns (p.7).

The Strategy should strengthen its national direction on cultural and social norms by considering the approaches undertaken in the VicHealth’s Alcohol Strategy 2016-19. This strategy provides a clear focus on the de-normalisation of risky drinking in priority groups, settings and subcultures (focus area 1).⁵ By adopting a stronger focus on this area, the Strategy will elevate the significance of changing cultural and social norms across the nation.

Recommendation: strengthen the Strategy’s position on addressing cultural and social drinking norms, providing a national direction for change. This could be achieved through including an additional objective under Priority 4 to ‘improve attitudes and cultural norms towards alcohol’.

Data

The Strategy provides an opportunity to improve alcohol-related datasets, particularly in relation to retail sales. Currently, the Victorian Commission for Gambling and Liquor Regulation (like other states) collects and reports data on wholesale transactions. This data does not provide a direct picture of local alcohol consumption per venue/outlet or per local government area. Access to this data would enable a better understanding of volumetric sales to assist in planning and the identification of where potential harms may have increased.

³ Alcohol Policy Coalition (2017) ‘Policy Statement – Packaged Liquor and harm in Victoria’ <http://www.alcoholpolicycoalition.org.au/downloads/position-statements/packaged-liquor-and-harm-in-victoria.pdf>, accessed 19/1/18

⁴ For example, in 2016 the Victorian Commission for Gambling and Liquor Regulation granted a packaged liquor licence for a Dan Murphy’s outlet in East Cranbourne despite strong local council and police objections, and local evidence of increasing alcohol-related harm (see *ibid.*, p.3)

⁵ VicHealth (2016b), p.12.



Recommendation: the Strategy should provide direction toward the investigation of nationally consistent retail-based data collection.