

1 November 2018

Select Committee on Personal Choice and Community Safety
 Legislative Council of Western Australia

By email: pccs@parliament.wa.gov.au

Dear Members of the Select Committee on Personal Choice

Alcohol Beverages Australia (ABA) is the pan-industry body created to highlight the positive social, cultural and economic contribution of alcohol beverages in Australia.

Our goal is promoting, explaining and defending the legitimate rights of the industry and the 15 million Australians who responsibly enjoy our drinks.

With members from all parts of the Australian alcohol beverages industry, Alcohol Beverages Australia uses a balanced, evidence-based approach to actively engage in public debate on alcohol policy issues and lead the development of innovative and effective alcohol policies, while at the same time acknowledging and working with all stakeholders to minimise the harms associated with alcohol misuse.

ABA recognises that excessive alcohol consumption can lead to harms. However, with the vast majority of Western Australians consuming alcohol responsibly, ABA submits that new measures relating to alcohol harm should target those consume alcohol excessively. Western Australian's who consume alcohol responsibly should not be unfairly limited in choice or penalised financially by population-wide alcohol regulation.

Setting the Scene - Drinking Behaviours of Western Australians

The vast majority of Western Australians consume alcohol responsibly. Government data provides irrefutable evidence that Western Australia have not only been consuming alcohol less frequently, but when they do consume alcohol they are consuming less.

Looking specifically at Western Australians, the table below outlines the key trends when it comes to alcohol consumption. It demonstrates and overwhelming continued improvement to drinking habits of Western Australians.

Indicator	2010	2016	Analysis
Alcohol related harm			
Consume alcohol daily	7.5%	6.4%	In 2016, there is a 14.7% decrease in the proportion of Western Australians who consumed alcohol on a daily basis compared to 2010.
Drinking at lifetime risky levels	23.0%	18.4%	In 2016, lifetime risky alcohol consumption among Western Australians has decreased by 20% compared to 2010. This is an important key indicator as it relates directly to a decrease in alcohol related harm and harmful alcohol consumption.



Drinking at single occasion risky levels on a weekly basis	18.2%	13.5%	In 2016, the proportion of the Western Australian population consuming alcohol at single occasion risky levels has decreased by 25.8%, adding to the evidence that harmful alcohol consumption has decreased significantly.
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Source: National Drug Strategy Household Survey 2016.

Indicator	2004	2016	Analysis
Youth			
12-17 year-olds abstaining	54.3%*	81.5%*	There has been a 50.1% increase in the proportion of young people who are abstaining from alcohol consumption. This provides strong evidence that harmful alcohol consumption (i.e. any consumption for those under 18) has decreased significantly since 2004.
Average age of first drink	14.8*	16.1*	This represents an 8.8% increase the average age when alcohol is first consumed. Delaying alcohol consumption is another indicator that shows alcohol related harm is decreasing.

*National data as WA-centric data is not available for this measure.

Indicator	2007	2016	Analysis
Pregnant women			
Percentage of pregnant women who either abstain or reduce alcohol consumption while pregnant.	96.6%*	98.8%*	These statistics show improving behaviours when it comes to alcohol consumption while pregnant.

*National data as WA-centric data is not available for this measure.

Reducing Alcohol Related Harms

The industry acknowledges that in order to minimise harmful alcohol consumption, a mixture of targeted and whole of population policy measures are required. When selecting the policy measures to implement to reduce alcohol related harm it important to understand the characteristics of the population to which the policy will be applied. Without understanding these characteristics, policies will not be successful as they will not meet the needs of the population.



Having established, through official government data outlined above, that the vast majority of Western Australians consume alcohol responsibly, it is clear that at a population level Western Australians cannot be characterised as having a problem with alcohol. As such, implementation of policies at the population level should be those that are focused on evidence based practices for education to assist with the continuation of the trend of responsible alcohol consumption.

In addition, the continued trend in increasing regulation in the alcohol industry, which impacts on consumers in both choice and price, should be carefully considered. Despite the ever improving trends, when it comes to Australia's relationship with alcohol, it is unfortunate that often the alcohol industry is targeted with disproportionately increasing regulation. It is difficult to justify regulation at the population level when the trends of consumption shows that the vast majority of consumers do so responsibly.

The industry is supportive of targeted measures when it comes to reducing alcohol related harm. That is, instead of focusing on policies that restrict or punish all consumers, governments should turn to targeted measures that will assist those who are at significant risk of alcohol related harm. By identifying the pockets within the population where harm occurs, understanding their characteristics and how they can be assisted, effective policy measures can be formulated. These measures will be far more effective in reducing alcohol related harm compared to population wide measures against the background of a vast majority of a population that consume responsibly.

By introducing population-wide regulation that is disproportionate to the actual levels of alcohol related harm, the cost to the industry of implementing the regulation is inevitably passed on to the consumer. Consumers will also be affected by limitations in personal choice on the ability to determine when and where they are able to purchase and consume alcohol. This restriction on personal choice produces no progress in limiting alcohol related harm.

Should you require any further information regarding this submission please contact me at gohar@alcoholbeveragesaustralia.org.au or 0423 501 009.

Yours sincerely



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