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Hon Mr Robin Chapple MLC  
Legislative Council, Parliament House  
By email: [robin.chapple@mp.wa.gov.au](mailto:robin.chapple@mp.wa.gov.au)

Dear Mr Chapple,

We write regarding the *Liquor Control Amendment Bill 2018* to note the support of the McCusker Centre for Action on Alcohol and Youth for clauses related to minimising harm from packaged liquor outlets, addressing sly grogging, and reducing underage access to alcohol purchased online.

Harms from alcohol are substantial in WA. Alcohol use costs the WA community \$3.1 billion per year in policing costs, hospitalisations, road crashes, and ambulances.<sup>1</sup> In WA in 2015, there were 565 alcohol-attributable deaths among people aged 15 years and older.<sup>2</sup> The McCusker Centre supports evidence-based approaches to preventing harm from alcohol among young people and the WA community. It is well-established that the availability of alcohol is linked to alcohol-related harms.<sup>3</sup> Increased availability of alcohol, including in terms of higher outlet density, is associated with increased harms from alcohol.<sup>3</sup> Packaged liquor, in particular, is of increasing concern from a public health perspective. State-based liquor laws provide important opportunities to control alcohol availability to reduce harm from alcohol.

The Bill covers a range of areas related to liquor licensing in WA and we wish to draw your attention to clauses of particular interest to the McCusker Centre. The Bill will enable the licensing authority to manage the number of packaged liquor outlets where sufficient outlets already exist within a community. It will also reduce the ability for large packaged liquor outlets to be established in close proximity to existing large packaged liquor outlets. To reduce the practice of sly grogging, the Bill contains new provisions to introduce 'carriage limits' that make it an offence for a person to carry liquor above prescribed quantities in prescribed areas of the State. The Bill also allows regulations to be made to prescribe criteria for licensees when delivering liquor. This change aims to restrict the potential delivery of liquor to juveniles. The McCusker Centre supports these proposed changes and we believe that they are positive steps towards addressing the availability of packaged liquor in WA, and minimising harms from alcohol to young people and regional WA communities affected by sly grogging.

Packaged liquor, largely from bottleshops, now accounts for more than 80% of alcohol sold in Australia.<sup>4</sup> Alcohol from bottleshops therefore contributes substantially to the immediate and longer term harms associated with alcohol. The packaged liquor market is increasingly dominated by supermarket-owned chains. For example, Woolworths (which owns Dan Murphy's, BWS and other retail formats) and Coles (which owns First Choice Liquor, Liquorland and other retail formats) accounted for around 63% of the

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<sup>1</sup> Alcohol.Think Again. Alcohol and Your Health Infographic; Mental Health Commission. 2017 [cited Mar 29 2018]. Available from: <http://alcoholthinkagain.com.au/Resources/Alcohol-Use-Statistics>.

<sup>2</sup> National Drug Research Institute. Bulletin 16: Estimated alcohol-attributable deaths and hospitalisations in Australia, 2004 to 2015. NDRI, Curtin University; 2018.

<sup>3</sup> National Preventative Health Taskforce. Australia: The Healthiest Country by 2020 – National Preventative Health Strategy – the roadmap for action. Canberra: Commonwealth of Australia; 2009.

<sup>4</sup> Euromonitor International. Passport: Alcoholic drinks in Australia. August 2013.

Australian liquor retail market share in 2016-17.<sup>5</sup> Destination liquor stores such as the supermarket-owned, warehouse-style liquor barns are dominating the alcohol retail sector. For example, Dan Murphy's accounted for \$1 in every \$3 spent on alcohol by Australians in 2016.<sup>6</sup>

Harms from packaged liquor are likely to occur away from the licensed premises and there is evidence of specific problems associated with packaged liquor outlets. Packaged liquor outlet density is positively associated with rates of assault, domestic violence, chronic disease, and very heavy episodic drinking.<sup>7</sup> An Australian study examining the links between alcohol outlet density and chronic alcohol-related problems found that off-premise alcohol outlet density was positively associated with rates of self-reported liver disease.<sup>8</sup> Another Australian study examining links between hospital admissions and alcohol outlet density found that the density of off-premise alcohol outlets is significantly related to alcohol-caused hospitalisations, including due to violence, alcohol use disorders, and other alcohol-related chronic diseases.<sup>9</sup> The researchers found that a 10% increase in the rate of packaged liquor licences would increase chronic alcohol-caused hospitalisations by 1.9% and assault rates by 0.8%.

There are particular public health concerns regarding large, warehouse-style liquor barns. These outlets generally promote the sale of very cheap alcohol, offer a large number of products at very low cost, require the purchase of large amounts of alcohol in order to access discounts, and can be expected to sell large volumes of alcohol. A WA study found that higher sales among off-premise outlets were associated with increased risk of alcohol-related injuries presenting to emergency departments in Perth from 2002 to 2010.<sup>10</sup> A study from Victoria found that off-premise outlet density was positively associated with both intentional and unintentional injuries, and in particular, chain outlets were found to most substantially contribute to injury risk.<sup>11</sup> This paper clearly demonstrated the link between low priced alcohol, alcohol sales volumes, and alcohol harms. Other research from WA has shown that off-premise alcohol outlet sales were a significant predictor of violent assaults reported to WA Police.<sup>12</sup> The larger the amount of alcohol sales linked to off-premises outlets within a local government area, the greater the likelihood of assault offences reported to police.<sup>12</sup>

We believe that the above research establishes a strong case for limiting the proliferation of packaged liquor outlets in WA. We hope you will consider this evidence and the concerning impacts of alcohol on our community when these amendments are debated in the Legislative Council. We would be happy to provide further information or to meet to discuss any of the issues we have raised here.

Yours sincerely,



Julia Stafford  
Executive Officer, McCusker Centre for Action on Alcohol and Youth

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<sup>5</sup> Do K. IBISWorld Industry Report G4123 Liquor Retailing in Australia. Melbourne: IBISWorld; May 2017.

<sup>6</sup> Roy Morgan Research. The Australian alcohol retail market in review; Mar 20 2017. Available from: <http://www.roymorgan.com/findings/7181-liquor-retail-australia-201703201051>.

<sup>7</sup> Livingston M. To reduce alcohol-related harm we need to look beyond pubs and nightclubs. Drug and Alcohol Review. 2013; 32(2):113-114.

<sup>8</sup> Theall KP, et al. The neighbourhood alcohol environment and alcohol-related morbidity. Alcohol & Alcoholism. 2009; 44:491.

<sup>9</sup> Livingston M. Alcohol outlet density and harm: Comparing the impacts on violence and chronic harms. Drug and Alcohol Review. 2011; 30(5):515-523.

<sup>10</sup> Hobday M, et al. The effect of alcohol outlets, sales and trading hours on alcohol-related injuries presenting at emergency departments in Perth, Australia, from 2002 to 2010. Addiction. 2015; 110(12):1901-1909.

<sup>11</sup> Morrison C, et al. Relating off-premises alcohol outlet density to intentional and unintentional injuries. Addiction. 2016; 111(1):56-64.

<sup>12</sup> Gilmore W, et al. Off-site outlets and alcohol-related harm. NDLERF. 2015. Available from: <http://www.ndlerf.gov.au/publications/monographs/monograph-56>.