



AUSTRALIAN MEDICAL ASSOCIATION
(SOUTH AUSTRALIA) INC.
ABN 91 028 693 268

6 July 2018

Legislative Services
Attorney-General's Department
GPO Box 464
Adelaide SA 5001

Dear Reviewer

Re: New Draft Liquor Licensing Regulations

Thank you for the opportunity to comment towards the Government's liquor licensing reforms. We note the draft Liquor Licensing (General) (Minors and Other Matters) Variation Regulations 2018, as provided in the Attorney-General's Department email of 1 June.

The AMA(SA) does not wish to comment on the fine detail of regulations in areas such as this; however, we are glad to inform the Department on the AMA's national position statement on Alcohol Consumption and Alcohol-related Harms (2012) which we provide for the consideration of Government in the context of liquor licensing regulation and reforms.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Joe Hooper'.

Joe Hooper
LLB(Hons), BSc(Nursing), Dip Applied Science
Chief Executive

Enc:

Extracts from the AMA's national position statement on Alcohol Consumption and Alcohol-related Harms (2012)

Alcohol marketing and promotion

The regulation of alcohol marketing and promotion should be statutory and independent of the alcohol and advertising industries, and should carry meaningful sanctions for noncompliance.

Such regulations should:

- prohibit marketing communications, packaging and branding that targets, or appeals to, children and young people;
- prohibit the production and sale of alcoholic energy drinks, and ban any marketing that promotes the use of energy drinks in conjunction with alcoholic beverages, including the promotion of alcoholic energy drinks at licensed venues;
- prohibit the sponsorship of sporting events, youth music events and junior sports teams, clubs and programs by alcohol companies or brands. Organisations should be encouraged and assisted to source alternative funding;
- limit the amount of alcohol marketing as well as its content. The volume of alcohol marketing that young people are exposed to has consistently been shown to affect their drinking behaviours, and is not sufficiently addressed through content regulations;
- prohibit alcohol advertising and promotion in locations, publications, and at times that are likely to influence teenagers and children. This should apply to point of sale promotions, branded merchandise, product placement, and new digital technologies such as social media, viral campaigns, mobile phones, and through online behavioural profiling;
- require that alcohol advertising encourages no more than the daily levels of consumption recommended by the NHMRC for low-risk drinking, and indicates what those levels are;
- require that all contexts of alcohol promotion include simple and clearly visible information about the health risks of excess consumption, and urge pregnant women not to consume alcohol. This should include point-of-sale, naming and digital media.

Product Content and Information

- Licensed venues should provide clearly visible point of sale signage that specifies the risks of excess alcohol consumption, and what constitutes unsafe levels of drinking.
- Glasses for alcohol at venues should indicate their volume in terms of standard drinks.
- Governments and other stakeholders should address the public's understanding of how various drinking vessels for alcohol (e.g. wine glasses, beer glasses) translate into a "standard drink" measure.
- Alcohol products should have simple and clearly visible front-of-pack labels that warn of the health risks of excess consumption, and urge pregnant women not to consume alcohol.
- Labelling of energy drinks should include warnings about the potential harms associated with mixing alcohol and energy drinks.

Access and Availability of Alcohol

- All service staff in licensed premises should undergo training in the responsible service of alcohol, and liquor licenses should be reviewed annually to assess responsible service.
- Liquor licensing regulations should consider the known impacts of liquor outlet density and opening hours on excess consumption, violence and related harms.
- State and Territory licensing authorities should regulate the issuing of liquor licenses

- in a way that is sensitive to the extant levels of alcohol-related harm in that respective State or Territory.
- The sale of energy drinks, and the mixing of energy drinks with alcohol, should be prohibited in licensed venues.

Pricing and Taxation of Alcohol

- All licensed premises should set a 'minimum floor price' for alcohol to disallow alcohol promotions involving free or heavily discounted drinks. Guidelines should also be developed for discount offers in off-licence retail outlets.

Research and Data Collection

There is a need for accurate, timely and comprehensive indicators and monitoring of alcohol use and alcohol-related harms.

- Alcohol sales data should be collected so that the sales volumes of each beverage type and type of outlet can be determined at local level to facilitate evaluation of community initiatives to reduce alcohol-related harm.
- Data on alcohol use and patterns collected by government departments or authorities should be readily available to alcohol researchers and program evaluators.

Position Statement in full can be found at ama.com.au > Advocacy > Position Statements