



**BREWERS
ASSOCIATION**

29 January 2016

The Hon John Rau MP
Attorney-General
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Dear John

The Brewers Association of Australia and New Zealand (Brewers Association) supports the development of a South Australian liquor licensing framework that will reduce red tape, encourage a safer drinking culture, and create vibrancy for the South Australian community.

Australian members of the Brewers Association comprise Carlton & United Breweries, Coopers and Lion, who collectively produce and distribute 95% of beer consumed in Australia. The Brewers Association believes we have an important role to play in finding solutions to reducing the harmful consumption of alcohol in our communities. A positive drinking culture and vibrant hospitality industry are fundamental to the long-term sustainability and prosperity of our industry, and we are committed to working collaboratively with all stakeholders to achieve these objectives.

South Australia's Liquor Licensing Act 1997 (the Act) binds a broad range of stakeholders to ensure that the sale, supply and consumption of alcohol are consistent with the objects of the Act. The Brewers Association provides its full support to these objects, while also noting that any reforms should be evidence-based. Furthermore, the objects should target the harmful consumption of alcohol while not adversely affecting the majority of the population who consume responsibly and sociably.

The Brewers Association is pleased that significant gains have been made in improving Australia's drinking culture, including reductions in underage drinking, an increase in the age of initiation, and reductions in harmful drinking patterns among young adults and the broader population. We encourage the South Australian Government to consider these improvements in the development or reform of alcohol policy.

We also note that Federal, State and Territory Governments are currently developing a National Alcohol Strategy through the Intergovernmental Committee on Drugs. The Brewers Association encourages the South Australian Government to ensure that its objectives and goals are aligned with this process.

We would be happy to discuss the content of our submission with you. Please do not hesitate to contact me, or the Brewers Association on (02) 6295 7199 or

Yours sincerely

Dr Tim Cooper AM MSc MD MBA
Chair

Brewers Association of Australia and New Zealand

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Brewers Association response to the South Australia Liquor Licensing Discussion Paper

1. A SAFER DRINKING CULTURE

How can we improve the harm minimisation provisions in our legislation? If so, what regulation is appropriate and in what circumstances? Should alcohol be able to be sold in supermarkets?

The Brewers Association holds concerns about any incidences of violence in the community, including in and around licensed venues. The Brewers Association believes that measures to reduce anti-social and violent behaviour need to place the responsibility of these acts directly on those who perpetrate the acts, and be supported by enforcement and education campaigns aimed at mitigating the occurrence of such violence.

The South Australian Government recently released its response to the review of the Late Night Trading Code of Practice, maintaining the existing 3.00am lockout and requiring existing safety measures to be implemented at earlier hours. The Brewers Association understands that a number of other measures were implemented at the time the Code was first introduced, including:

- an increased visible police presence in late-night economy precincts
- increased information and public transport services by Government
- changes to taxi ranks.

Following a review of the Code, the Government has cited “a significant drop in alcohol-related offences and anti-social behaviour in the Adelaide area”¹. Given this review was based on only twelve months of data, The Brewers Association believes that these changes should continue to be monitored and evaluated over a longer timeframe before any further restrictions are considered.

Alcohol in supermarkets

The Brewers Association believes that it is important to ensure that any changes to liquor licensing in supermarkets are undertaken consistently across all alcohol categories. In particular, beer should be included to ensure that consumers have a low alcohol alternative, and that the South Australian beer industry is not put at a disadvantage if any proposals to liberalise liquor laws were to go ahead.

The beer industry is not only a major local employer and contributor to the hospitality and tourism sector in South Australia, but beer itself is also the lowest alcohol strength beverage available and the only alcohol category to provide consumers with options to moderate consumption.

Beer is already disadvantaged in comparison to wine, due to Federal taxation arrangements which are contributing to a shift in consumption from beer to wine. The introduction of any further discriminatory policies would simply exacerbate this category shift, and reduce investment and employment in the beer industry.

If the Government does elect to pursue this proposal, the Brewers Association requests that you do not take a discriminatory approach against local brewers. The proposal, as it stands, would disadvantage the beer category which is an important contributor to the SA economy, with two of the country’s largest breweries based in the State.

¹ News release from Attorney General and Minister for Planning John Rau, Thursday 3 December 2015

Should we regulate the consumption or possession of alcohol by minors at private parties? If so, how?

Although the Brewers Association notes that underage consumption of alcohol has fallen over recent decades, it also recognises that more can always be done to ensure that minors do not have access to alcohol. All members of the Brewers Association support DrinkWise, which has run one of Australia's most successful campaigns targeted at reducing under-age consumption of alcohol.

As of 2013, Australian National Drug Strategy Household Surveys (NDSHS) data reveals a consistent rise in abstainer rates for 12-17 year olds to 72.3%, up significantly in recent years from 56.5% in 2007 and 63.6% in 2010.² Those who are consuming alcohol aged between 12 and 17 years are also drinking at less harmful levels with reductions in lifetime risky drinking patterns from 4.2% in 2010 to 2.6% in 2013, and reductions in single occasion risky drinking patterns from 14.1% in 2010 to 8.7%.³

Recent Australian research also concludes that the predictors of frequent alcohol consumption among adolescents included having a sibling or a friend who consumed alcohol; believing parents, friends and/or siblings approved of drinking; drinking behaviours of parents, friends and/or siblings; and having a higher disposable income.⁴ Further evidence of the important role of parents comes when we look at the statistics on where under-18s obtain their alcohol. The vast majority of alcohol supplied to minors is supplied by friends and family.

The Brewers Association supports measures such as appropriate licensing laws and secondary supply laws which ensure that minors are not able to access alcohol.

The Brewers Association believes the following opportunities exist:

- **National approach to secondary supply laws:** a number of Australian states have implemented secondary supply laws and the South Australian Government should consider adopting these laws. A consistent, national approach to this issue would send an important message about underage drinking. This approach should be supported by an effective education campaign aimed at parents, retailers and other adults informing them of the laws, but also ensuring that they understand the impact of underage consumption and why the law is important.
- **A national alcohol education curriculum for secondary schools:** to improve young people's understanding of the physical effects of alcohol and how to mitigate risks should they choose to drink when they are of age.
- **Effective parental campaign:** research consistently demonstrates that parents are the greatest influence of likely alcohol consumption patterns and habits of young Australians. Education campaigns and relevant tools for parents, such as those from DrinkWise Australia's 'Kids absorb your drinking' campaign, should be supported to increase their reach to parents.

² [Alcohol use \(NDSHS 2013 key findings\), Australian Institute of Health and Welfare](#)

³ Ibid.

⁴ Jones SC, Magee CA (2014), *The Role of Family, Friends and Peers in Australian Adolescent's Alcohol Consumption*, Centre for Health Initiatives, University of Wollongong, Australia, Drug and Alcohol Review 2014.

Should the State Government be working together with the Commonwealth Government to reduce alcohol access and abuse?

The Brewers Associations believes that governments, communities, NGOs and industry should all work collaboratively to reduce harm from excessive alcohol consumption. The Brewers Association believes that measures targeting harm and abuse are more effective than those which take a whole of population approach, specifically those that include a focus on pricing.

The Discussion Paper notes that while the South Australian Government does not have the power to regulate the price of alcohol, it “needs to consider how the price of alcohol impacts upon alcohol-related harm and whether the State and Commonwealth Governments can work closely together to address this issue”.

Evidence demonstrates that price controls are ineffective at targeting the harmful consumption of alcohol, and instead reduce overall per capita consumption levels. Untargeted policies that unfairly impact those who enjoy alcohol responsibly, rather than those who consume harmfully, will damage South Australia’s hospitality and tourism sectors for no benefit.

An Australian study released in 2013, based on the NDSHS conducted in 2001, 2004 and 2007, comprising a total of 79,545 respondents along with real alcohol prices compiled by Euromonitor International, concluded:⁵

“These results suggest that in response to price increases, Australian drinkers achieved an average reduction in their overall level of alcohol consumption mostly by increasing the number of occasions on which they do not drink at all and by decreasing the number of occasions of low-intensity drinking, rather than by significantly reducing their frequency of moderate- and high-intensity drinking”.

“Heavier and more frequent drinkers appear to be relatively less sensitive to changes in price.”

The Federal Government is conducting a broad-ranging review of taxation, which includes alcohol taxation. To ensure consistent policy development nationally, the Brewers Association encourages the South Australian Government to contribute to this process, rather than create a duplication of the process.

⁵ Byrnes, Shakeshaft, Petrie and Doran; Can harms associated with high-intensity drinking be reduced by increasing the price of alcohol? *Drug and Alcohol Review* (January 2013), 32, 27-30.