

28 January 2016

The Hon Timothy Anderson QC
Review of the Liquor Licensing Act 1997
Consumer and Business Services
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Dear Mr Anderson

SUBMISSION TO THE REVIEW OF THE LIQUOR LICENSING ACT 1997

Thank you for the opportunity to provide a submission to the Review of the *Liquor Licensing Act 1997* (the Review). The comments in this submission are provided by SANDAS Inc in support of the submission prepared by the Foundation for Alcohol Research and Education (FARE).

Prevention of alcohol harms should be the first priority in undertaking this Review. Alcohol's toxicity poses threats to the health, safety and wellbeing of the consumer. Also of significant concern for society and governments is the harms a person's alcohol consumption can pose to others. In particular the role of alcohol in intimate and family violence is considerable. Any new legislation should reflect the emerging directions and evidence emerging from the work of implementing the National Framework For Protecting and Nurturing Australia's Children similar frameworks for Prevention of Violence to Women and Children.

The SA Government's *Alcohol and other drug strategy 2011* (AOD strategy) acknowledges these threats. The strategy also acknowledges that 'substance misuse causes a disproportional amount of harm in the Aboriginal community'.ⁱ The Government has also committed to a 'Health in All Policies' (HiAP) approach to policy development. Alcohol is a prime example of how other sectors influence public health.

The policies enshrined in the *Liquor Licensing Act 1997* have material bearing on the health and wellbeing of the people of SA. As such, the Government's goal of reducing the rate of alcohol-related harms necessitates a health-focused revision of alcohol policies that concern the price, availability and promotion of alcohol.

SA lacks a liquor regulation system and legislative framework that serves these public health interests. Disappointingly, this was not the subject of the Discussion Paper, nor the Review's Terms of Reference. These documents also failed to mention SA's AOD strategy and the HiAP perspective on alcohol policy and a range of other significant national frameworks as highlighted above.

This Review of *Liquor Licensing Act 1997* (the Act) is a decisive opportunity for the Government to improve the health and wellbeing of South Australians on the back of evidence-based liquor policies.

SANDAS Inc therefore calls on this Review to recognise the need to regulate liquor in line with the public interest in harm prevention and community consultation. We commend the FARE response to this Review as being consistent with our own understanding of the issues and commend their highly detailed response. We have submitted our own response under separate cover.

Yours sincerely

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ⁱ SA Government 2011 AOD strategy, p.10