

12 November 2014

Professor Ian Harper
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Dear Professor Harper

Competition Policy Review – submission by the Australian Health Promotion Association

Thank you for the opportunity to comment on the above draft report.

The Australian Health Promotion Association has an active interest in preventing alcohol misuse, which is a major contributor to Australia's total disease burden. As such, we contend that if recommendations made in the *Competition Policy Review: Draft Report September 2014* (<http://competitionpolicyreview.gov.au/>) are adopted, they would generate significant increases in alcohol related harm across Australia.

The draft report Panel recognises that alcohol is a dangerous product that requires regulation, but states that there is "no case to exempt" alcohol regulations from review. Contrary to the Panel's assertion that the liquor retail sector is "heavily regulated", it is evident that the current *under* regulation of alcohol retail is the most significant barrier Australian communities face in their attempts to reduce alcohol-related harm.

The recent National Alcohol Summit in Canberra (28-29 October 2014) identified three areas for urgent action to reduce the significant harm being generated by the liquor retail sector in Australia:

1. Greater restrictions into planning, zoning and licensing for alcohol outlets, with greater community input.
2. Reduced retail trading hours for liquor outlets.
3. Restricting the proliferation of supermarkets being able to sell large volumes of alcohol at discounted prices.

The recommendations within the Competition Policy Review Draft Report, as they apply to alcohol retail, are effectively opposite to the recommendations arising from the National Alcohol Summit.

Alcohol is very clearly a dangerous product that requires comprehensive regulation. In rigidly applying economic "competition principles" and further deregulating the liquor retail sector, the Competition Policy Review would be actively undermining its own stated aim of "improving the welfare of Australians".

The Australian Health Promotion Association strongly recommends that the liquor retail sector must be excluded from the scope of this review.

Yours sincerely



Paul Klarenaar
Board Member



Gemma Crawford
President