

18 November 2014

Professor Ian Harper
Competition Policy Review Secretariat
The Treasury
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Dear Professor Harper

SUBMISSION TO THE COMPETITION POLICY REVIEW

Thank you for the opportunity to provide a submission to the *Competition Policy Review Draft Report* (Draft Report).

As an organisation that has worked with communities for over fifty years to reduce alcohol problems, the Australian Drug Foundation is concerned that acceptance by government of many recommendations in the Draft Report will result in increased levels of alcohol harms. As a result the ADF endorses the submissions prepared by the National Alliance for Action on Alcohol and Foundation for Alcohol Research and Education (FARE).

Due to the capacity of alcohol to cause damage to the individual that consumes it, and to persons who do not, and to whole communities, alcohol deserves to be treated as a special product that is unlike other consumables. As a toxic product, alcohol requires special laws and restrictions about the terms of its availability and sale, including where it may be sold, when it may be sold and who can consume it. Such regulations reflect the risks entailed in the sale and consumption of alcohol and they represent the public interest and the public's benefit.

The Draft Report states that the aim of Competition Policy is to "*improve the welfare of Australians*" but the recommendations outlined in the Draft Report will not achieve that aim, as they will lead to the increased availability of alcohol and in turn to increased alcohol related problems and harms. The previous review of Competition Policy resulted in an increase in the number and types of premises selling alcohol across Australia. This has contributed to alcohol-related harms which include 15 deaths (62% increase in ten years) and 430 hospitalisations each day.¹

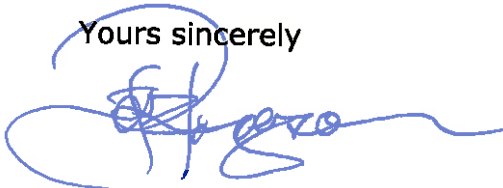
Alcohol & drug information
Community programs
Policy and advocacy
Workplace services

The consensus by independent alcohol researchers around the world has found that the level of alcohol related harm in a society is generally related to the levels of consumption in that society and that the ease of availability is a major mediator of consumption levelsⁱⁱ.

For that reason the ADF is opposed to measures that will ease the regulation of alcohol sales in Australia, as that is likely to result in increased consumption and a decrease in health and wellbeing of Australians.

Thank you for the opportunity to comment on the Draft Report

Yours sincerely



John Rogerson
Chief Executive Officer

ⁱ Gao, C., Ogeil, R. and Llyod, B. (2014). Alcohol's burden of disease in Australia. Canberra: FARE and VicHealth in collaboration with Turning Point

ⁱⁱ Babor T. et al (2010) Alcohol. No Ordinary Commodity. UK: Oxford University Press.