

17 November 2014

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Competition Policy Review Secretariat
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To the Competition Policy Review Panel,

Re: Competition Policy Review Draft.

Brimbank City Council welcomes the opportunity to provide a submission to the Australian Government's Competition Policy Review Draft Report.

The City of Brimbank is located between 11 and 23 kilometres west of Melbourne GPO, including the suburbs of Sunshine, St Albans, Deer Park, Sydenham, Taylors Lakes and Keilor. Brimbank is the second most populous municipality in Greater Melbourne, with an estimated population of 191,084. Cultural diversity is high and increasing with 46.1% of Brimbank residents indicating they were born overseas.

The Brimbank City Council Community Plan 2009-2030 (Updated 2013), which incorporates the Municipal Public Health and Wellbeing Plan, highlights Council's commitment to the health and wellbeing of our residents. Alcohol is an identified priority issue within this Plan.

Council is concerned with recommendations in the Competition Policy Draft Review that have the ability to greatly increase the availability of alcohol within communities. The three recommendations listed below are of specific concern:

1. Removing restrictions for planning and zoning for alcohol outlets;
2. Deregulating retail trading hours, and,
3. Reducing constraints on supermarkets being able to sell alcohol.

One of the guiding principles in the Competition Policy Review is to ensure competition laws are fit for purpose and improve the welfare of Australians. Council is of the opinion that the welfare of its residents and the wider community will be disadvantaged by increasing availability of alcohol and therefore contrary to the Competition Policy Review's guiding principles.

The recommended change in regulation around zoning, planning, trading hours and allowing supermarkets to sell alcohol will significantly increase the availability of alcohol in communities. An increase in the availability, affordability and promotion of alcohol has consistently been shown to increase alcohol related harms in both individuals and the communityⁱ.

Heavy alcohol consumption is major causes of road accidents, domestic and public violence and crime and also strongly associated with chronic diseases including liver disease and brain damageⁱⁱ. This contributes to approximately \$15 billion per year in costs to the Australian health care system. From an economic, health and social perspective decreasing the availability of alcohol within communities may help to reduce this toll.



Brimbank City Council urges the Competition Review Panel to consider the implications of the three recommendations in terms of minimising alcohol-related harm in the community. In particular, if these recommendations were to be implemented local government's ability to manage and prevent alcohol related harms in the community would be significantly affected. Brimbank City Council recommends the Australian Government consult with local government with the intention to revise the abovementioned recommendations.

If you have any questions or would like to discuss any of these matters further please do not hesitate to contact me.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Neil Whiteside', with a horizontal line underneath.

Neil Whiteside
Director Community Wellbeing

ⁱ National Drug research Institute (2007) Restrictions on the Sale and Supply of Alcohol: Evidence and Outcome. Perth, Curtin University of Technology.

ⁱⁱ National Drug Strategy; A framework for action on alcohol, tobacco and other drugs 2010-2015.