



17 November 2014

Professor Ian Harper
Competition Policy Review Secretariat
The Treasury
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PARKES ACT 2600
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Ask for: Natalie Walker
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Our Ref: A2030459

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.

Hobsons Bay City Council would like to raise concerns in relation to some key recommendations within the report, specifically in relation to the further weakening of regulations that govern the sale and supply of alcohol, these include:

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

The Draft Report states that the aim of Competition Policy is to "improve the welfare of Australians" however the recommendations outlined in the Draft Report will not achieve this, rather they will lead to the increased availability of alcohol and increased harms. The previous review of Competition Policy resulted in vast increases in the number and types of premises selling alcohol across Australia.

The relaxing of packaged liquor regulation is of key concern. Over three quarters (78 per cent) of all alcohol in Australia is bought as packaged liquor for off-premises consumption. Data indicates that over half of those purchasing packaged liquor consume at levels that would put them at risk of alcohol-related injury.¹

Increases in the availability, affordability and promotion of alcohol are consistently demonstrated to increase alcohol consumption and increase social and health harms, both of which cost government and the community.

Alcohol misuse can affect anyone, however we know that young people and people who are disadvantaged through situations such as experiencing low income, unemployment, and housing stress, are disproportionately at a higher risk of experiencing harm. This is an important consideration for the City of Hobsons Bay

when planning for future land use planning as key sections within the municipality experience high levels of disadvantage.

The extent of alcohol related harm in Hobsons Bay is clear. In 2012-13, alcohol was involved in 14 deaths, 140 emergency department presentations, 414 hospitalisations, 269 ambulance attendances and 153 incidents of family violence in Hobsons Bay. It is also clear that young people are disproportionately represented in the city's statistics.¹¹

Alcohol management needs to take a harm minimisation approach, one which has been a key policy for state and federal governments since 1985. This approach encompasses the integration of strategies and partnerships, including those within the liquor industry. Strategies include supply reduction, demand reduction, and harm reduction.

As per the *Local Government Act 1989* and the *Public Health Act 2008*, councils are responsible for protecting and promoting the wellbeing of the community. As the closest level of government to the community, one key mechanism of councils is being able to understand community needs and the nuances needed within local land use planning.

Local government's role to plan for the physical environment, in which alcohol consumption and alcohol related harm occur, is key in preventing and reducing the harms. Without well informed planning, the potential to either mitigate or increase alcohol-related harm is impeded as is the preservation of local amenity which ensures the places where people live, work and socialise support and improve their health and wellbeing.

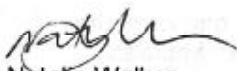
A blanket state and or federal approach to liquor licensing runs the risk of doing more harm to communities than good. The recommendations of the draft report reflect a freeing up of market controls and a reduction in local government's controls, to the detriment of community wellbeing.

The gradual erosion of state wide and locally based controls on the opening of new licensed premises in Victoria over the past two decades has put commercial interests ahead of the interests of local communities, having detrimental impacts. It is therefore recommended that controls on the physical availability of alcohol, such as setting limits on the number, size, density of alcohol outlets, and their opening hours, should be largely informed by evidence based local planning policies developed by local government.

Furthermore, it is concerning that despite the Australian and international research examining the extent to which outlet density is associated with alcohol problems, the recent report of Victorian Auditor General's Office indicated that currently no Victorian government agency is monitoring alcohol sales data for Victorian outlets, nor do they have the data systems to be able to do so. It is therefore suggested that the state and federal government work in partnership with local governments to ensure the data collected is meaningful for local level analysis and future planning.

Thank you for the opportunity to raise these important issues. Should you wish to discuss this submission further please contact me on 9932 1096 or email nwalker@hobsonsabay.vic.gov.au.

Yours sincerely,



Natalie Walker
Director Strategic Development

ⁱ Victorian Health Promotion Foundation (2013). The social harms associated with the sale and supply of packaged liquor in Victoria. Victoria: VicHealth in collaboration with Turning Point

ⁱⁱ Turning Point (2014) Hobsons Bay Alcohol and Other Drug statistics