

November 17, 2014

Professor Ian Harper  
Competition Policy Review Secretariat  
The Treasury  
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PARKES ACT 2600  
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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).

I am concerned that the recommendations made in the Draft Report will greatly increase the availability of alcohol in Australia and lead to significant increases in alcohol harms. I would like to offer my support to the submission prepared by the Foundation for Alcohol Research and Education (FARE). FARE is an independent not-for-profit organisation working to stop the harm caused by alcohol by joining with communities, governments, health professionals and police across the country.

Alcohol is not like other grocery products, it is a product that requires special consideration in relation to its sale and licensing. It is essential that laws and restrictions about where it can be sold, when it can be sold and who can consume it are not only retained but strengthened. These regulations should reflect the harm that alcohol can cause. Such laws are both in the public interest and for the public's benefit. Alcohol should not be subject to same economic principles as other household groceries. Increasing the availability of ordinary groceries will not cause the significant harm to the community that increased access to alcohol will cause.

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 this, as they will lead to the increased availability of alcohol. A very significant body of research, developed internationally, shows that increased availability of alcohol leads to greater harms. In this way, alcohol is more akin to tobacco and controlled drugs than it is to other groceries. The previous review of Competition Policy resulted in vast increases in 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.<sup>1</sup>

Alcohol does not only harm the individuals that consume it. It also has a significant impact on their partners, children, friends, employers and colleagues and the community in general. Recent research by FARE into the range and magnitude of alcohols harm to others found that<sup>2</sup>:

- 367 people died and almost 14,000 people were hospitalized because of the drinking of others
- More than 70,000 Australians were victims of alcohol-related assault, of these 24,000 people were victims of alcohol related domestic violence
- Almost 20,000 children were victims of substantiated alcohol-related child abuse

- More than 10 million Australians experienced some negative effect of a stranger's drinking in one year
- 70% of Australians were affected in some way by another person's drinking

The Fare report also examined the economic impact of alcohol on the Australian community and found that:

- The cost of someone else's drinking totals more than \$20.6 billion
- Tangible costs which consists of out-of-pocket costs, forgone wages or productivity, and hospital and child protection costs to \$14.3 billion
- Intangible costs equate to \$6.4 billion. These are costs assigned to lost quality of life due to someone else's drinking

Alcohol licensing and restrictions are designed to lessen the impact that misuse of alcohol has on Australian society. They are an essential component of a public health approach to managing the health and welfare of all Australians. For this reason we request that the Competition Policy Review Secretariat ensures that the relevant jurisdictions are not impeded in their attempts to manage alcohol sales and distribution.

Thank you once again for the opportunity to raise these important issues with you.

Yours sincerely



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<sup>1</sup> Gao, C., Ogeil, R. and Llyod, B. (2014). Alcohol's burden of disease in Australia. Canberra: FARE and VicHealth in collaboration with Turning Point

<sup>2</sup> Laslett, A-M., Catalano, P., Chikritzhs, Y., Dale, C., Doran, C., Ferris, J., Jainullabudeen, T., Livingston, M, Matthews, S., Mugavin, J., Room, R., Schlotterlein, M. and Wilkinson, C. (2010) The Range and Magnitude of Alcohol's Harm to Others. Fitzroy, Victoria: AER Centre for Alcohol Policy Research, Turning Point Alcohol and Drug Centre, Eastern Health.