



Qld Coalition for Action on Alcohol 2024 Election Submission



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About QCAA

The QCAA is an alliance of leading health and community service agencies committed to reducing alcohol related harm. QCAA identifies and prioritises actions needed to reduce alcohol harms and improve the health and wellbeing of Queenslanders and ensures that these actions are raised with decision makers. QCAA members include

- Alcohol & Drug Foundation
- Australian College of Emergency Medicine
- Australian Medical Association Qld
- Cancer Council Qld
- Drug and Alcohol Nurses Australasia
- Drug ARM
- Drug Awareness & Relief Foundation (Australia)
- Foundation for Alcohol Research and Education (FARE)
- Lives Lived Well
- Royal Australian College of Surgeons (Qld)
- Salvation Army Queensland Division
- Queensland Alcohol and Drug Research and Education Centre
- Queensland Network of Alcohol and other Drug Agencies

For further information about QCAA, visit www.qcaa.org.au or contact the QCAA secretariat at contactus@qcaa.org.au.

Introduction

Alcohol has a complex role in our society. While some Queenslanders abstain from alcohol altogether, alcohol consumption has been embedded in the cultural fabric of Australian life. This longstanding norm conceals alcohol's role in serious issues such as domestic and family violence, that demand our urgent attention.

Beyond its role in social gatherings and celebrations, alcohol contributes to a range of harmful effects that hurt our communities, health systems, and economy. The widespread availability and cultural endorsement of alcohol often overshadow its potential for harm, with many Queenslanders unaware of the severe consequences of moderate consumption such as cancer, cardio-vascular disease, mental health issues and other chronic diseases.

Recent measures, such as the Tackling Alcohol-Fuelled Violence initiatives, have demonstrated progress in managing these issues. These policies have made significant strides in enhancing safety and reducing violence in Queensland's entertainment precincts. However, there remains a clear and pressing need for continued and expanded efforts.

This submission outlines key policies recommended by the Queensland Coalition for Action on Alcohol for adoption by the next Queensland Government. Our 4 Point Plan aims to foster a healthier, safer, and more vibrant Queensland for all.

In this election, we urge all political leaders and parties to put the health and wellbeing of Queenslanders first by adopting evidence-based alcohol policies. As an alliance, we are committed to improving the health and wellbeing of Queenslanders and we look forward to doing this in partnership with the next Queensland Government.

Our 4 Point Plan

1. Give individuals the chance to make informed decisions on alcohol
2. Creating safe, healthy environments through online sales and delivery reform
3. Retain and expand the Tackling Alcohol Fuelled Violence policy
4. Addressing domestic and family violence through increased alcohol and other drug service capacity

1 Give individuals the chance to make informed decisions on alcohol

We are calling on the next Queensland Government to emulate successful public health campaigns like those against tobacco, and launch a comprehensive community education campaign highlighting the direct link between moderate alcohol consumption and cancer.

Alcohol and Cancer Risk

Sadly, the number of Queenslanders diagnosed with alcohol-related cancers is growing each year. Moderate alcohol consumption is directly linked to various cancers, including those affecting the oral cavity, throat, liver, and breast, contributing to nearly 6,000 lives lost annually and over 144,000 hospitalizations across Australia¹². It accounts for over 200 disease and injury conditions, costing Australia an estimated \$66.8 billion annually and comprising 4.5% of the total burden of disease³⁴⁵. Alarming, 4% of all new cancers in Australia are attributed to alcohol⁶.

Public Awareness

Despite the irrefutable causal link between alcohol use and cancer, awareness remains low among Queenslanders. A recent survey underscored concerns about alcohol's broader impacts, including violence and strain on health services.

Survey findings highlight disparities in knowledge⁷:

- Many males and individuals on lower incomes are unaware of alcohol's cancer risks.
- Specific cancers linked to alcohol, such as breast and oral cancers, are poorly understood by the public.
- Regional communities exhibit lower awareness of alcohol harms compared to urban areas.

There is a pressing need for robust public education similar to anti-smoking campaigns, which have effectively reduced smoking rates.

Research has also shown the effectiveness of adding cancer warning levels to alcohol products, increasing awareness of the causal link with cancer and other diseases⁸.

Just like we protected the community from tobacco harms, we can protect them once again with a public education campaign that covers the harms of alcohol and the introduction of cancer warning labels.

Greatest Risk

Cheap alcohol products are disproportionately responsible for alcohol-related harms in Queensland communities. While they make up only a small fraction of the market, these products are specifically targeted at those most vulnerable to alcohol

harms —people who consume alcohol at dangerously high volumes. Research shows that just 20% of Australians drink 75% of all alcohol sold in the country.

Many communities around the world have successfully introduced a **minimum unit price** (floor price) for alcohol, which sets a floor price below which cheap alcohol cannot be sold. This price is typically lower than what most moderate drinkers already pay for beer, wine, and spirits, but is high enough to reduce access to the most harmful, cheapest products. For most Queenslanders, a minimum price wouldn't change their alcohol purchases, but it may nudge those drinking heavily to reduce their consumption, and in some cases, seek help.

We know this approach works. Five years after the introduction of a floor price in the Northern Territory, significant reductions have been seen in alcohol-related ambulance callouts, emergency department presentations, assaults, arrests, road crashes, and child protection cases. The policy targeted just the cheapest products at the bottom of the market but delivered broad community benefits.

The Path Forward

At the end of the day, alcohol, like gambling and tobacco, is not like other products on the market. It causes significant harm in our community. That's why we need to invest in prevention and education to safeguard our community from an industry that generates the majority of their sales from people who are most harmed by their products.

Proposed Actions

To mitigate the substantial burden of alcohol-related cancers and enhance public awareness, the Queensland Government must take decisive action:

1. **Launch a comprehensive community education campaign** highlighting the direct link between moderate alcohol consumption and cancer.
2. **Require warning labels on alcohol products** that clearly outline the risks associated with alcohol consumption, including the link to cancer.
3. **Introduce a minimum unit price for alcohol** of at least \$1.50 per standard drink.

2 Retain and expand the Tackling Alcohol Fuelled Violence policy

Everyone deserves to feel safe when enjoying Queensland's nightlife. Following the successful implementation of the Tackling Alcohol-Fuelled Violence policy, levels of alcohol-related violence in safe night precincts (SNPs) have reduced, and people have reported feeling safer while enjoying the state's nightlife⁹. Despite this success, there is still more to be done.

We are calling on the Queensland Government to continue the progress made in reducing alcohol-related violence by retaining the *Tackling Alcohol-Fuelled*

Violence strategy, and expanding the policy to end the sale of takeaway alcohol after 10pm.

Addressing Alcohol-Related Harm

Alcohol use is not an excuse for violence, but in many instances, it is a significant risk factor that can exacerbate aggressive behaviour. The QUANTEM report shows that restricted trading hours in Queensland have successfully reduced levels of alcohol-related violence in safe night precincts (SNPs):

- 29% average reduction per month state-wide in serious assaults between 3am and 6am
- 40% reduction per month in the Fortitude Valley SNP in serious assaults between 3am and 6am
- 29% reduction in ambulance callouts in SNPs between 3am and 6am, and an average 11% reduction state-wide
- 12% reduction in hospital admissions of ocular bone fractures in greater Brisbane, and a 4% average reduction per month state-wide
- At least 1 serious crime (including rape and grievous bodily harm) per week across Queensland solved using ID scanner data

Regulating Availability

Currently, in Queensland, alcohol can be purchased around the clock, seven days a week. Standard trading hours for on-licence premises are from 10am to midnight, with possible extensions to 5am. Off-licence premises typically trade from 10am to 10pm, but extended hours can allow trading from 9am to midnight. For those who are trying to cut back or break free from the cycle of alcohol use and dependency, the easy availability of alcohol undermines their efforts to recover. Easy availability of alcohol makes it difficult for people trying to reduce their consumption.

Public Support for Regulation

More than half of Queenslanders (56%) support a closing time for bottle shops of no later than 10pm¹⁰. The Queensland Government has restricted the sale of take-away alcohol past 10pm for new licence applications, but many outlets still trade beyond this time. The evidence is clear: the more available alcohol is, the higher the risk of alcohol-related harms.

Queenslanders strongly support measures to reduce alcohol-related harms¹¹. By expanding the Tackling Alcohol-Fuelled Violence policy and ending the sale of take-away alcohol at 10pm, we can further protect our communities from alcohol-related violence and harm.

Proposed Actions

1. **Retain the Tackling Alcohol-Fuelled Violence policy** to continue the progress made in reducing alcohol-related violence.
2. **Expand the policy to end the sale of all take-away alcohol at 10pm** to further reduce the availability of alcohol and its related harms.

3 Creating safe, healthy environments through online sales and delivery reform

We are calling on the next Queensland Government to introduce comprehensive regulations for the online sales and delivery of alcohol. These regulations should prioritise the health and wellbeing of our community, much like the successful tobacco legislation and regulation in Australia.

Supporting Our Community

Alcohol promotions, like gambling and tobacco, are designed to keep consumers locked in a cycle of use and dependence. For those trying to cut back or break free from these products, the online sales and delivery of alcohol is another way they are constantly exposed, undermining their efforts to break from the cycle. Increasing the availability of alcohol makes it difficult for people trying to reduce their consumption and to avoid the reach of these companies.

Protecting Our Families

Currently, alcohol is sold and delivered in Queensland without effective ID checks or delivery-specific responsible service of alcohol (RSA) training. This lack of regulation allows alcohol to be left unattended, delivered to minors, and to people who are intoxicated¹²¹³. Additionally, alcohol is delivered rapidly, enabling impulsive purchases and the continuation of existing drinking sessions. Late-night deliveries further increase the risk of alcohol-related family violence, which peak during these hours¹⁴¹⁵.

Prioritising Public Health

The regulatory environment has not kept pace with changes in alcohol sales, placing families and communities at greater risk of alcohol-related harms. A 2023 PureProfile poll revealed that only 21.6% of people believe the state government is doing enough to address alcohol harms, while 41.4% think the government isn't doing enough, and 37% are unsure¹⁶. The survey also showed strong public support for stricter regulations:

- 73.3% support ID verification when placing an online alcohol order.
- 78.3% support ID checks at the point of delivery.
- 55.3% support prohibiting alcohol delivery after 10 pm.
- 88.4% believe companies should face penalties for delivering alcohol to minors.
- 62.8% support penalties for delivering to intoxicated individuals.
- 66.4% support mandatory RSA training for delivery staff.

Ensuring Safety at Home

Alcohol contributes significantly to harm across the state, including family and domestic violence. When delivered online, this harm often remains invisible. Over 70% of women who accessed domestic violence support through the statewide DVConnect helpline reported that alcohol consumption was a factor in their case¹⁷.

As frontline responders, we witness the significant harms at the individual, family and community level caused by the rapid expansion of unregulated online alcohol sales and delivery. Implementing these policies will create safer, healthier environments by reducing alcohol availability and its associated harms.

All Queenslanders deserve a community that values and prioritises the wellbeing and safety of every individual – and that's what these policies will do.

Allowing the alcohol industry to self-regulate has led to unacceptable community impacts. Therefore, we call on the Queensland Government to introduce regulatory measures prioritising health over corporate profits and protecting our community from the relentless marketing practices of the alcohol industry.

Proposed Regulatory Measures

Late-Night and Rapid Delivery:

1. Limit late-night deliveries: Only permit delivery from 10 am to 10 pm.
2. Prevent rapid delivery: Implement a 2-hour safety pause from order to delivery.

ID Checks and Offences:

3. Ensure effective digital ID-checks for sales.
4. Introduce an offence for selling online to people under 18.
5. Ensure effective ID checks upon delivery.
6. Introduce an offence for leaving deliveries unattended.
7. Introduce an offence for delivery to people under 18.

Predatory Marketing:

7. Prevent predatory marketing e.g. push notifications, incentives, buy-now buttons, and payment delays.
8. Require digital health warnings linked to national guidelines to reduce health risks from alcohol.

Compliance and Data:

9. Improve online sales data collection and reporting by area.
10. Enhance delivery data collection and reporting, e.g., refusals by area.
11. Introduce online sales and delivery (OS&D) test purchasing to enforce compliance.

Licensing and Risk Factors:

12. Establish a specific OS&D licence category.
13. Ensure effective community consultation for OS&D licences.
14. Develop risk ratings for OS&D.
15. Reflect OS&D in a supply density risk factor.

Delivery Staff Protection:

16. Support delivery staff with delivery-specific RSA training.
17. Introduce an offence for delivering to intoxicated individuals.
18. Make companies liable for breaches.
19. Protect drivers from penalties for refusal to deliver.

4 Addressing domestic and family violence through increased alcohol and other drug service capacity

We are calling on the next Queensland Government to support increased alcohol and other drug service capacity to address domestic and family violence, including an examination of a shared care approach to facilitate cross-sector collaboration between alcohol and other drug services and domestic violence services. We aim to provide the most effective models to achieve better outcomes for families affected by violence, child maltreatment, and neglect by improving alcohol and other drug services to provide a no-wrong-door approach to service delivery.

Breaking Down Barriers

The causes of family violence are deep-rooted in our society, involving harmful cultural norms and structural inequalities. Alcohol use is not an excuse for violence, but in many instances, it is a significant risk factor that can exacerbate it. There is a need for sector-wide capability improvement and an examination of shared models of care aimed at overcoming obstacles preventing sectors from working together, ensuring that families affected by violence and neglect receive comprehensive support. Such models aim to enable systems to better understand the needs of their clients, improve service coordination, and ensure that no one is turned away from receiving the help they need.

Building on Success

Mental health and alcohol and other drug sectors in Queensland have successfully developed a collaborative, shared approach to improve service outcomes through programs such as the Improved Services Initiative (2007-2012) and "Connecting Care to Recovery 2016-2021." Programs such as these provide models for approaches to sector cooperation to address family and domestic violence.

Addressing Critical Needs

Acknowledging the harmful role of alcohol in family violence is an important part of this wider effort to keep women and children safe. As stated in the recently released *Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence* rapid review, "this kind of intervention is long overdue and holds enormous potential for reducing the recurrence of violence; for intervening more effectively with people using violence; and for preventing further harm to children".

Alcohol is involved in between 23% and 65% of all police-reported family violence incidents. The use of alcohol by perpetrators of violence also increases the severity of family violence, leading to higher rates of physical violence and injury. By supporting these proposed actions, we can create a community where everyone receives the support they need, promoting safety, health, and well-being for all.

That's why we're calling on the Queensland Government to be a leader, and put the health and wellbeing of women and children before industry profits. Together, we can build a Queensland that values and prioritises the wellbeing and safety of every individual, ensuring that no one falls through the cracks and everyone has access to the support they need.

Everyone deserves to be safe in their own home. But family and domestic violence still shatters far too many lives across Queensland every year. For too long, alcohol's role in exacerbating this violence has been ignored.

Therefore, we call on the Queensland Government to support the further enhancement of the alcohol and other drug sector, in collaboration with other service providers, to prevent and address family and domestic violence in Queensland.

Proposed Actions

1. **Support alcohol and other drug services** to improve capability in addressing domestic and family violence.
2. **Invest in the evaluation of coordinated service** between alcohol and other drug services and other service providers addressing domestic and family violence.

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