

**Submission to**  
**Australian National Preventative Health Agency**  
**In response to**  
**Issues Paper**  
***Alcohol Advertising: The Effectiveness of Current  
Regulatory Codes in Addressing Community  
Concerns***

**Prepared by**  
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**(ALSA)**

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**ALSA**

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# Executive Summary

The Australian Liquor Stores Association (ALSA) welcomes the opportunity to make the following submission to ANPHA regarding the Issues Paper – Alcohol Advertising: The Effectiveness of Current Regulatory Codes in Addressing Community Concerns.

## ALSA Background

ALSA membership comprises approximately 3,000 retail liquor stores around Australia, including some of the most recognised and trusted brands in liquor retailing in Australia. These range from small family owned local convenience independent outlets, independently owned and run outlets operating under banners such as Cellarbrations, Little Bottler, Local Liquor, Baron's, Porters and many more, through to Woolworths packaged liquor outlets including Dan Murphy's, BWS Liquor & Woolworth's Liquor and Coles Packaged Liquor outlets including First Choice, Vintage Cellars & Liquorland stores.

Altogether ALSA represents employers of over 90,000 people in the retail liquor store sector across Australia, including many trainees and apprentices.

ALSA believes that alcohol consumption is ultimately an issue of individual responsibility. However, as the Industry association representing the significant majority of Australia's retailers of alcohol beverages, ALSA also fully accepts that it has a key responsibility to work with the Government and the community to minimise harm to individuals and local communities.

It is for this reason that ALSA continues to promote standards of operation for its members beyond the required standards of legal compliance and has implemented a range of voluntary product and service control initiatives across our members' stores which are focussed on responsible supply and promotion of alcohol. Many of these initiatives, initially trialled and introduced by our larger members such as Woolworths, have subsequently been adopted by other industry participants, including:

- launch of ID-25 program supported by staff training and point-of-sale material. Under this program, if a customer looks under the age of 25 our staff will ask to see proof of age identification prior to selling alcohol to that customer;
- launch of "Don't Buy It For Them" Secondary Supply Program supported by staff training and point-of-sale material;

In addition to these initiatives, ALSA has also recently developed and launched the ALSA Product Ranging Guidelines. These guidelines incorporate a checklist guide to assist individual operators to make sensible product ranging decisions on products that are packaged and marketed irresponsibly including recommending de-ranging RTD products that contain more than two standard drinks in a single serve container; and point-of-sale information campaigns on responsible drinking including standard drinks educational campaigns.

ALSA and its members have a long history of working with government and regulators to disseminate educational materials through their liquor outlets directly to consumers.

In addition, ALSA owns and runs the Retail Liquor Development Foundation (RLDF) to provide low cost subsidised training to encourage responsible and professional retailing by its members. RLDF is

available to liquor retailers and their staff nationally. ALSA is also currently working with other industry groups to pioneer additional training and accreditation standards for licensees and their staff.

ALSA has a demonstrated commitment to responsible supply and promotion of alcohol beverage products and has in place many voluntary responsible service and supply initiatives.

## **Alcohol advertising regulatory framework**

The vast majority of Australians enjoy alcohol responsibly and alcohol marketers including retailers should be in a position to sensibly advertise their products in their efforts to gain or hold market share. Alcohol is a product that is very much part of the Australian social fabric and it is important that the regulatory environment it operates within is able to balance the needs of the majority who consume in moderation and sensibly against the small minority who seek to drink excessive or harmful levels.

The Australian alcohol beverage and hospitality sector is committed to the goal of reducing alcohol misuse and abuse as evidenced by extensive involvement in targeted programs including establishing and actively supporting DrinkWise Australia, standard drinks labelling and a quasi-regulatory regime for alcohol advertising.

The industry established the ABAC Scheme in 1992 that has continually been expanded and strengthened over the intervening years to ensure a strict regime that has now resulted in the quasi-regulation of alcohol beverage advertising in partnership with the Australian Government.

The advertising and marketing environment for alcohol in Australia is highly regulated and the requirements set out in the ABAC Scheme ensure a mature, balanced and responsible view of alcohol is presented to the public. The code specifically outlines the standards for alcohol advertisements, with one of the key standards being that alcohol advertising “must not have a strong or evident appeal to children or adolescents”.

For the Agency to make a case that any exposure of advertising or marketing to people under the age of 18 years is detrimental to their well-being and that the policy objective should be to reduce exposure, has not been properly demonstrated in the Issues Paper.

Regulation should not always be the first solution. It is important for policy makers to balance a desire for additional regulation and compliance to solve problems of alcohol abuse against prevailing views and community standards of the vast majority of Australians who drink responsibly.

ALSA supports the voluntary participation in the ABAC scheme and believes that this scheme will continue to be an effective and viable self-regulatory initiative.

## **Evidence –based policy**

ALSA recommends that the status quo should prevail and that the current regulatory framework be maintained until there is sufficient evidence to justify change.

ALSA submits that policy makers should be mindful when considering further restrictions or greater government control and oversight of alcohol advertising is that it is responding to genuine community concern. Policy development needs to reflect an “above-reproach” evidence base and demonstrate proper costs-benefits analysis.

### **Support for existing arrangements**

ALSA supports the current regulatory framework of alcohol advertising and marketing in Australia as it balances the views of the community with the needs of alcohol advertisers to promote their products in a responsible manner.

The present structure for administering the ABAC Scheme has not attracted criticisms other than from individuals or organisations that have taken a very public anti-alcohol or anti-industry position with questionable motives.

### **Conclusion**

ALSA believes that ABAC scheme is an effective example of self-regulation, which covers the majority of Australian alcohol advertisers. ALSA cautions against overstating community concern in relation to alcohol advertising in the absence of evidence base supporting this claim.