



Alcohol, Tobacco and other
Drugs Council Tasmania Inc.



Submission to the Consultation Draft National Alcohol Strategy

February 2018



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Alcohol, Tobacco and other Drugs Council of Tas Inc. (ATDC)

Phone: 03 6231 5002

Suite 1, Level 1, 175 Collins Street

Hobart TAS 7000

www.atdc.org.au

Contact: Debra Rabe, CEO

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THE ALCOHOL, TOBACCO AND OTHER DRUGS COUNCIL

The Alcohol, Tobacco and other Drugs Council Tas Inc. (ATDC) is the peak body representing the interests of community sector organisations (CSOs) that provide services to people with substance use issues in Tasmania. We are a membership based, independent, not-for-profit and incorporated organisation.

The ATDC is the key body advocating for adequate systemic support and funding for the delivery of evidence based alcohol, tobacco and other drug (ATOD) initiatives. We support workforce development through training, policy and development projects with, and on behalf of, the sector.

We represent a broad range of service providers and individuals working in prevention, promotion, early intervention, treatment, case management, research and harm reduction. We are underpinned by the principle of harm minimisation, which aims to improve public health, social inclusion and co-morbid illness outcomes, for individuals and communities.

We play a vital role in assisting the Tasmanian Government to achieve its aims of preventing and reducing harms associated with the use of alcohol, tobacco and other drugs in the Tasmanian community.

Tasmanian ATOD community sector organisations:

<ul style="list-style-type: none">• Advocacy Tasmania	<ul style="list-style-type: none">• Red Cross Tasmania
<ul style="list-style-type: none">• Anglicare Tasmania Inc.	<ul style="list-style-type: none">• Relationships Australia Tasmania Inc.
<ul style="list-style-type: none">• Bethlehem House Tasmania Inc.	<ul style="list-style-type: none">• Rural Alive and Well Inc.
<ul style="list-style-type: none">• Circular Head Aboriginal Corporation	<ul style="list-style-type: none">• South East Tasmanian Aboriginal Corporation (SETAC)
<ul style="list-style-type: none">• Colony 47	<ul style="list-style-type: none">• Tasmanian Council on Hepatitis, HIV AIDS and Related diseases.
<ul style="list-style-type: none">• Drug Education Network Inc.	<ul style="list-style-type: none">• Teen Challenge Tasmania
<ul style="list-style-type: none">• Headspace/Cornerstone Youth Services	<ul style="list-style-type: none">• The Link Youth Health Service
<ul style="list-style-type: none">• Holyoake Tasmania	<ul style="list-style-type: none">• The Salvation Army
<ul style="list-style-type: none">• Launceston City Mission (Missiondale)	<ul style="list-style-type: none">• Tasmanian Users Health Support League
<ul style="list-style-type: none">• Mission Australia	<ul style="list-style-type: none">• Wyndarra Centre
<ul style="list-style-type: none">• Quit Services Tasmania	<ul style="list-style-type: none">• Youth Family and Community Connections

Our submission has the following main points:

- 1. Clear direction is needed for Australian governments and their relationships with private alcohol: could this be an indicator of success?**
- 2. Reinforce the prevention agenda at a national level**
- 3. Emphasise the strength of partnerships in providing innovative approaches while acknowledging the need to break silos**
- 4. Monitoring progress – qualitative data can also tell us about change**
- 5. We want the strategy to take a firmer position on the alcohol industry's involvement in advertising in sporting events**
- 6. Key points in the Draft Strategy that the ATDC strongly supports**

- 1. Clear direction is needed for Australian governments and their relationships with the alcohol industry: could this be an indicator of success?**

Should unhealthy commodity producers whose primary interest is making profit be involved in health governance?

The ATDC supports strong and clear messaging about the appropriateness or otherwise of governments and policy makers and the relationships with the alcohol industry (encompassing manufacturers, suppliers and retailers). We applaud the direction taken regarding the membership of the Reference Group, in which alcohol industry representatives are not eligible to be members. We believe that a core purpose of the Strategy is to provide clear direction to state and local governments and stipulate the rationale and encourage others to examine their relationship.

At an international level regarding tobacco control there are guidelines that essentially require governments to keep the tobacco industry away from the policy-making process. Whereas in so many contexts, alcohol companies are seen as having contributions to make in the development of the alcohol policy.

So much of the experience of tobacco control and so much of the evidence base suggests that excluding the commercial interests who have a vested interest in selling harmful products is likely to be a pre-condition for the development of effective policies.¹

¹ Professor Jeff Collin, 2017, Editorial: The alcohol industry, unhealthy commodity producers and health governance, quoted on <http://drinktank.org.au/2017/10/the-alcohol-industry-unhealthy-commodity-producers-and-health-governance/> accessed online on 6/2/2018.

One clear indicator of success across the time period of the Strategy would be an audit of state governments and their relationships with the alcohol industry. If in 10 years we had all governments striving for appropriate relationships, this would be significant progress.

2. Reinforce the prevention agenda at a national level

The potential for future budget blow-outs worries governments. As recognised, the essence of prevention is take action now to put the appropriate strategic measures in place across the community and enact prevention measures across the lifespan of individuals, then this will reap numerous dividends. In a recent article by independent policy analyst Martyn Goddard, it is suggested that Tasmania is behind other Australian states in investment in prevention:

Tasmania's record in actually funding preventative health services is the worst in the nation. State government funding accounts for 58% of the national average, well behind the other states (New South Wales and Queensland) which are also behind the average. Public health is defined as activities for the protection and promotion of health and the prevention of disease, illness or injury. The category includes ... health promotion, screening programs, communicable disease control and the prevention of harmful drug use.

The implications for health services and patient care are profound. These are areas – including mental health, alcohol and drugs, disease prevention – in which the absence of adequate services can have devastating effects on vulnerable people. These non-hospital services are among the cheapest to provide in the entire health system but can save massive amounts of money and personal suffering.²

Arguably, the entire Strategy has a prevention agenda, however a discrete section that provides the rationale for prevention in relation to alcohol will further serve to set the agenda clearly. Further, the ATDC believes that there should be separate budget allocations and monitoring for prevention as well as acute services. This is not the case in Tasmania with regard to ATOD, with the exception of tobacco use. It would be useful for a clear strategic direction to be set at the national level to reinforce the prevention agenda.

The ATDC is a firm advocate for reform in health policy to ensure that prevention approaches feature strongly within the mixture of health approaches. While the term is used a few times within the Draft Strategy, the ATDC believes the emphasis should be strengthened and articulated further both within providing strategic directions for Governments and also monitoring and tracking health trends.

3. Emphasise the strength of partnerships in providing innovative approaches while acknowledging the need to break silos

On page 21 of the Draft Strategy, the opportunities for action listed under “Deliver a quality, responsive, safe and effective treatment system” could be expanded to include an emphasis on partnerships within the ATOD sector

² Goddard, M., 2017, Media Release, Community Health underfunded by \$84 million, accessed online 7/12/2017, found here: <http://tasmaniantimes.com/index.php?/article/community-health-underfunded-by-84-million/>

(across government, community and private providers) and also between the ATOD sector and allied health and welfare sector agencies.

Encouraging innovative responses directly addresses service system issues (such as siloed provision of services) as well as increase access (geographical coverage and flexible opening hours) and responsiveness through engagement of the local community is key to

For example, with regard to innovation and targeted responses, we have heard that there is an urgent need to embed ATOD and mental health intervention within men's crisis homelessness services. There is an ongoing need in this dense population of individuals with AOD and mental health issues for rapid on site access for support, in a way that is not currently funded.

Another example involves alcohol policy alliances.³ Such coalitions are springing up across the globe which advocate for evidence-based policies free from commercial interests, that encourage proactive community based responses (for example regional alcohol action plans) invigorated through local networks. This is one of a number of options open to the Government. We believe that alcohol requires a whole of community approach.

4. Monitoring progress – qualitative data can also tell us about change.

The measures of success (p26-27) are quantitative indicators drawn from large scale data sets. It is suggested that these be supplemented with information from a randomly selected group of people who have sought treatment for an alcohol use disorder. Using stratified sampling approaches the relevant demographic variables of people experiencing alcohol use disorder can then bring forward a series of focus groups or targeted research speaking directly with the affected communities. Whole population level indicators are very useful for scene/context setting, however, it is only through talking to affected communities directly that we can get a depth of worthwhile understanding and indeed explore the themes and findings from quantitative indicators. Case studies add further meaning and understanding about how the system does or doesn't work and also signal complexity in case presentations among many other advantages. We argue that this information is vital to contribute to the evidence that informs high level strategic direction.

5. We want the strategy to take a firmer position on the alcohol industry's involvement in advertising in sporting events

The ATDC is concerned that alcohol advertising in sport promotes the consumption of alcohol. While watching the Australian and English cricket match in Hobart last night (7/2/18) a significant number of advertisements for Carlton xxx beer were seen around the borders of the ground. Advertisements for alcohol are included in every major sport – football, soccer, cricket and even motor racing. Alcohol companies put a large amount of money into advertising and sponsorship of these events. Those attending are encouraged to drink their product or consume

³ Examples include: Global Alcohol Policy Alliance accessed on 4/12/2017, found at: <https://globalgapa.org/>, NSW/ACT Alcohol Policy Alliance, accessed on 4/12/2017, found at: <http://naapa.org.au/>, California Alcohol Policy Alliance, accessed on 4/12/2017, found at: <https://www.alcoholpolicyalliance.org/>

alcohol in general. What message is this sending? That you can't participate in sport, or at least enjoy the sport without the consumption of alcohol.

Alcohol companies sponsor local sports clubs and ensure that the club only sells the sponsors products for after game celebrations and club meetings. Posters to advertise the company and product are scattered around the sports club and ground. This is not acceptable.

The ATDC supports the need for strict legislation around advertising of alcohol and the exclusion of advertising and sponsorship from the alcohol industry at sporting events.

Public figures are also need to be discouraged from including alcohol or venues where alcohol is served for public meetings or media opportunities.

6. Key points in the draft strategy that the ATDC strongly supports

We strongly support the Consultation Draft National Alcohol Strategy generally. In the Tasmanian context the ATOD sector is currently working on the development of a strategy for our state and as such, this document will provide strong strategic directions. The ATDC wishes to highlight the following points as particularly relevant:

- The strong emphasis on treatment in the Strategy, the inclusion of family and friends around the person seeking treatment, the acknowledgment of co morbidity and the need for better integration with other health and welfare sectors.
- The focus on greater transparency of licensing decisions.
- That revenue from a tax on alcohol to be allocated to prevention and treatment.
- The move to national advertising standards.
- Strong support for the opportunities for a national campaign that links risky alcohol use and the development of cancer.