

Commissioner for Licensing  
GPO Box 1374  
HOBART TAS 7001

23 January 2020

To the Commissioner,

**Re: Liquor License Application - Caltex Moonah - objection**

The Alcohol Tobacco and other Drugs Council (ATDC) wishes to lodge an objection to the proposed licence.

While we recognise that there are already in place similar instances of selling alcohol in places such as small grocers (eg Hill St in West Hobart as one example), we urge caution in increasing their number for the following reasons:

- Alcohol is, by a large margin, and both historically and currently, the primary drug of concern for people that seek treatment and support in Tasmania.
- More Tasmanians drink at risky levels than the Australian average.
- Alcohol contributes to ill health and premature death of many Tasmanians and that a proportion of this can be prevented by sensible evidence based public policy.
- With regard to the licence application proposed for Caltex Moonah – we claim that the selling of alcohol and the advertising and promotion of the product in a service station will further increase the normalisation of alcohol use in the community and that this is a contributor to alcohol related harm as noted above. We question if the selling of alcohol in a place where children (defined as under 18) frequent is appropriate and, as such, is in the 'best interests of the community'. As noted above, we recognise similar off licences exist however we also note that this is being wound back<sup>1</sup> and that the global<sup>2</sup> shift in public health is to limit advertising and promotion and be mindful of where it is located. The World Health Organization's *Best buys' and other recommended interventions* identified restrictions on exposure to alcohol advertising (across multiple types of media) and restrictions on the physical availability of retailed alcohol as two of the three 'best buys' for reducing disease risk associated with alcohol.
- Of particular concern with this licence application is the exposure to alcohol advertising and marketing to children<sup>3</sup>. A substantial body of evidence claims that children are exposed to

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<sup>1</sup> <https://www.vichealth.vic.gov.au/letter/articles/alcohol-and-sport>

<sup>2</sup> World Health Organization, 2017, Tackling NCDs: 'best buys' and other recommended interventions for the prevention and control of noncommunicable diseases', found here - [https://www.who.int/nmh/publications/best\\_buys\\_summary.pdf](https://www.who.int/nmh/publications/best_buys_summary.pdf) accessed on 22/1/20.

<sup>3</sup> Foundation for Alcohol Research and Education - see here - <http://fare.org.au/policy/marketing/>



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thousands of images of alcohol by the time they reach 18 and that this exposure can lead to some drinking earlier and at hazardous levels.

Young people who have greater exposure to alcohol marketing appear to be more likely subsequently to initiate alcohol use and engage in binge and hazardous drinking.<sup>4</sup>

- Another example is Anderson *et al.*<sup>5</sup> In this study the authors identified 13 longitudinal studies investigating the relationship between adolescent exposure to alcohol advertising and promotion and drinking. Twelve found evidence that such exposure predicts both onset of drinking among non-drinkers and increased levels of consumption among existing drinkers, while the 13th found increased intentions to use alcohol, although the authors concluded that participants were too young for drinking initiation to show an effect.
- We recognise that many of the studies focus on advertising on television, however the promotion of alcohol in public places (eg sports grounds, billboards, retail outlets and the like) also contributes to the number of images that feature alcohol products that are seen by children across their adolescence. The ubiquitous imagery has been shown, see above, to increase brand recognition and also has an impact on patterns of drinking. We maintain that advertising and promotion of alcohol in a service station further contributes to alcohol being seen as a 'normal activity'.

Lastly we take a non-judgemental view of alcohol use and we recognise that individuals have a role to play in their own health care and that most adults are capable of making their own choices. We also note that this application is primarily to sell Tasmanian products which we assume to be priced at the higher end. Should this vendor sell cheap/discounted alcohol then that has the potential to generate further harm.

To the best of our knowledge, there is at least one other service station that retails alcohol currently, however licences in these types of outlets are still low in number in Tasmania. We urge the Commissioner to consider if the selling and promotion of alcohol in service stations would contribute to alcohol related harm in the Tasmanian community with the above points in mind. Moreover, we are concerned that this sets a precedent, or at the very least, has the potential to encourage and continue the spread of alcohol being made further available, subsequently leading to greater outlet density, harm and so on.

We have also included further articles below that support the claims made above.

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<sup>4</sup> Jernigan D., Noel J., Landon J., Thornton N. & Lobstein T. 2016, 'Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008', *Addiction*, 112:S1, available online at: <https://onlinelibrary.wiley.com/doi/full/10.1111/add.13591> accessed on 22/1/2020.

<sup>5</sup> Anderson P., De Bruijn A., Angus K., Gordon R., Hastings G. Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol Alcohol* 2009; **44**: 229–243.



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Sincerely,



Dr Jackie Hallam  
A/CEO  
Alcohol Tobacco and other Drugs Council

**Further information:**

The Alcohol, Tobacco and other Drugs Council is the peak body representing and supporting community organisations, and the people they assist, to reduce alcohol, tobacco and other drug related harm for all Tasmanians.

It is our vision that Tasmania can be free from alcohol, tobacco or other drug related harm or discrimination.

Through advocacy, policy, research and workforce development initiatives, we seek to increase investment into alcohol, tobacco and other drugs services across Tasmania. It is also our aim to foster a collaborative, inclusive and effective alcohol, tobacco and other drugs sector and facilitate positive change in community attitudes and policy settings.

**Further research:**

Anderson P, de Bruijn A, Angus K, Gordon R, Hastings G. Impact of alcohol advertising and media exposure on adolescent alcohol use: A systematic review of longitudinal studies. *Alcohol*. 2008; **44**: 229– 43.

Austin E, Chen M, Grube J. How does alcohol advertising influence underage drinking? The role of desirability, identification and skepticism. *J Adolesc Health*. 2006; **38**: 376– 84.

Collins R, Ellickson P, McCaffrey D, Hambarsoomians K. Early adolescent exposure to alcohol advertising and its relationship to underage drinking. *J Adolesc Health*. 2007; **40**( 6): 527– 34.

Ellickson P, Collins R, Hambarsoomians K, McCaffrey D. Does alcohol advertising promote adolescent drinking? Results from a longitudinal assessment. *Addiction*. 2003; **100**: 235– 46.

Fleming K, Thorson E, Atkin C. Alcohol advertising exposure and perceptions: Links with alcohol expectancies and intentions to drink or drinking in underaged youth and young adults. *J Health Commun*. 2004; **9**( 1): 3– 29.



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Jones S, Magee C. Exposure to alcohol advertising and alcohol consumption among Australian adolescents. *Alcohol*. 2011; **46**( 5): 630– 7.

Ross C, Ostroff J, Siegel M, DeJong W, Naimi T, Jernigan D. Youth alcohol brand consumption and exposure to advertising in magazines. *J Stud Alcohol Drugs*. 2014; **75**: 615– 22.

Smith L, Foxcroft D. The effect of alcohol advertising, marketing and portrayal on drinking behavior in young people: Systematic review of prospective cohort studies. *BMC Public Health*. 2009; **9**: 51.

Monteiro MG, Babor TF, Jernigan D, Brookes C. Alcohol marketing regulation: from research to public policy. *Addiction*. 2017; **112**: 3– 6.



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