

Commissioner for Licensing
Department of Treasury and Finance
GPO Box 1374
HOBART TAS 7001

To the Commissioner,

Re: Liquor Licence Application – Dan Murphy's Bellerive

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

Our reasons are as follows:

- More Tasmanians drink at risky levels than the Australian average. Approximately 127,736 Tasmanians drink at levels that increase their risk of harm according to the National Health and Medical Research Council's 'Australian Guidelines to reduce health risks from drinking alcohol'.¹
- 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.
- The ATDC has been monitoring the number of Tasmanians seeking treatment for drug use over the past 12 months and in the month of May 2021, over 800 Tasmanians were receiving treatment and support to address their drinking through specialist community-managed alcohol and other drug service providers (noting that this figure is an underestimate as it does not capture Tasmanians seeking support through public health managed services, GPs, or other digital supports).
- 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.
- Of great concern is the lack of a process that takes into account Tasmanian jurisdictional information that would determine the tipping point at which outlet density/alcohol availability generally (e.g. opening hours) in a given area has the potential to generate harm for the community. Enacting and enforcing restrictions on the physical availability of retailed alcohol is a cost effective intervention recommended by the World Health Organisation.²
- The ATDC is aware that the Tasmanian Government has previously invested considerable time and effort into the development of a data modelling tool specifically in relation to forecasting alcohol

¹ Found here: <https://www.nhmrc.gov.au/health-advice/alcohol>

² World Health Organization. 2017, Best Buys and other recommended interventions for the prevention and control of noncommunicable diseases, found here: https://www.who.int/ncds/management/WHO_Appendix_BestBuys_LS.pdf



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- harms. The ATDC is unable to speak to this work, but is aware that it was being designed to help inform situations such as this. That is, where there are already an existing number of alcohol retail outlets in a community, how would introducing more potentially increase community harm. We would recommend the Commissioner seek clarification from the Department of Health regarding the status of this work, particularly given the large number of bottle shops already operating in this community.
- As per the summary over-page, there is already at least 8 bottle shops in the area of the proposed Dan Murphy's, with development applications approved for a further two (not including this one). While there is no research available that the ATDC can point to that definitively confirms that adding one more would be the 'tipping point', we would argue that given the size of the community, and the number of bottle shops already operating, that the chances of community harm would likely be increased.
- Additionally, with regard to the licence application proposed for Dan Murphy's Bellerive we are concerned the selling of alcohol and the large scale prominent advertising and promotion that occurs by this company will further increase the normalisation of alcohol use in the community - a contributor to alcohol related harm as previously noted.
- Of particular concern is the exposure to alcohol advertising and marketing to children³. A substantial body of evidence claims that children are exposed to thousands of images of alcohol by the time they reach 18 and that this exposure means that they drink earlier and drink 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.⁴

- Another example is Anderson *et al.*⁵ 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 also contributes to the number of images that feature alcohol products that are seen by children across their adolescence.

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

⁴ 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.

⁵ Anderson P., De Brujin 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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We urge the Commissioner to consider if the selling and promotion of alcohol on a large scale as evident by Dan Murphy's in other jurisdictions would contribute to further alcohol related harm in the Tasmanian community. We have also included further articles over-page that support the claims made above.

In closing I would again like to raise the ongoing concern regarding the 14 day window of opportunity for the community to make representations, and the manner that notifications are provided to the public.

It is our view that the ongoing reliance on regional newspapers and printed hard-copy notifications on the proposed licenced premises no longer meets the needs or expectations of community with respect to being informed of when a liquor licence application has been submitted.

As I have noted in previous correspondence, the ATDC monitors the Department of Treasury and Finance website for licence applications, but have previously found this to be an ineffective manner to ensure that we remain informed. This issue is exacerbated by the short community consultation time-frame outlined in the Act of just 14 days.

This time-frame is not considered in-line with the benchmarks of other jurisdictions and significantly impacts the integrity of the community representation process. This is a view shared by others, with one member of the community contacting our office this week, angered by the timeframe restrictions and frustrated that they did not have the time to prepare a submission for your consideration. As such, our organisation continues to advocate for the existing 14 day timeframe for community representations to be extended to a minimum of 30 days as a matter of priority.

If you require any additional information I can be contacted directly on 0450 517 017 or via email at ceo@atdc.org.au.

Sincerely,



Alison Lai
Chief Executive Officer

6 August 2021



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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.

Summary of concerns: The ATDC takes 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. The focus of our organisation is on reducing the harms associated with alcohol use across the State.

When assessing this liquor licence application it is important to note:

The large number of existing bottle shops in the surrounding area: The surrounding area where the bottle shops are proposed already have several bottle shops available for community members to access within a small kilometre radius. Most notably these include:

1. Big Bargain Bottle Shop, Rokeby Road Howrah
2. Big Bargain Bottle Shop, Mornington
3. Big Bargain Bottle Shop, Clarence Street Bellerive
4. 9/11 Bottle Shop, Shoreline Shopping Centre
5. Thirsty Camel, Shoreline Shopping Centre (located in the car park)
6. 9/11 Bottle Shop, Cambridge Road Bellerive (located at the Waterfront Hotel)
7. BWS, Eastlands Shopping Centre (located in car park)
8. Cellarbrations, located inside Eastlands Shopping Centre

This list also does not include the other two development applications approved by the Clarence City Council in 2020 at the two following locations:

1. Shop 5, 14 Edgeworth Street, Warrane
2. Shop 3, 76 Howrah Road, Howrah.

Proximity of schools and community centres: The surrounding area where the bottle shops are proposed include a mix of education services and community organisations and services. Given the high proliferation of existing bottle shops, it is our position that there is no additional positive benefit to be obtained by introducing additional alcohol retailers into the surrounding area.

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|--|----------------------------|
| - Warrane Primary School | - Bellerive Primary School |
| - Howrah Primary School | - Clarence High School |
| - Warrane / Morning Neighbourhood Centre | - Howrah Community Centre |



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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 Alcohol.* 2008; **44**: 229– 43.
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- 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.
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