Five point plan to reduce alcohol-related harms in Queensland
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About the Queensland Coalition for Action on Alcohol

The Queensland Coalition for Action on Alcohol (QCAA) is a coalition of Healthy Options Australia, the Australian Medical Association Queensland (AMAQ), Queensland Alcohol and Drug Research and Education Centre (QADREC), the Foundation for Alcohol Research and Education (FARE) and Lives Lived Well. The QCAA aims to identify and prioritise what needs to be done to achieve a cultural change that will reduce alcohol harms and improve the health and wellbeing of Queenslanders.

QCAA is fashioned on the National Alliance for Action on Alcohol (NAAA) and comprises a number of organisations within Queensland, with an interest in alcohol harm reduction and/or public health. This broad-based Queensland Alliance has come together to pool collective expertise and knowledge around what strategies are needed to reduce the harms associated with the drinking culture in Queensland.

The QCAA is a coalition of like-minded health and community organisations in Queensland committed to reducing alcohol-related harm.
The five point plan

1. Wind back late night trading hours and continue the moratorium on late night trading

QCAA proposes that the Queensland Government legislate to introduce a 12 month statewide trial of the reduction of trading hours based on the Newcastle alcohol restrictions, including:

- retain the current standard trading times of 10am to midnight and transition back to a 3am closure for extending trading permits
- introduce lockouts at all extended trading permits from 1.00am
- continue the moratorium on all late night trading across Queensland.

2. Control the density of licensed premises

QCAA proposes that the Queensland Government:

- establish and enforces saturation zones in areas that are identified as already having large numbers of liquor licenses
- introduce cumulative impact and cluster control policies for the determination of new liquor licenses.

3. Prevent the harmful discounting and promotion of alcohol

QCAA proposes that the Queensland Government:

- strengthens the Liquor Act 1992 to prohibit the harmful discounting and promotion of alcohol products on both on and off-licensed premises
- ensure that these measures are enforced.

4. Enforce responsible service of alcohol requirements

QCAA proposes that the Queensland Government:

- introduce measures to better enforce Responsible Service of Alcohol (RSA) requirements in licensed venues throughout Queensland, including Compliance Officers visiting licensed premises outside of regular business hours
- introduce requirements for the Office of Liquor and Gaming Regulation (OLGR) and the Queensland Police to publically report on compliance activities relating to the Liquor Act 1992, the number of venues inspected and their location, the times of day that these venues are inspected and the number of identified breaches of compliance
- prohibit the sale of shots, mixed drinks with more than 30ml of alcohol and ready mixed drinks stronger than five per cent alcohol by volume after 10.00pm
- prohibit the sale of more than four drinks to any patron at one time and a requirement to provide free water stations on every bar
- prohibit the sale of alcohol mixed with energy drinks after midnight.

5. Collect data on alcohol sales, consumption and harms

QCAA proposes that the Queensland Government:

- work collaboratively to improve processes for the collection and coding of alcohol harms data including data from police, ambulance services and hospitals
- continue the collection and publication of alcohol sales data in Queensland.
Introduction

- 76 per cent of Queenslanders believe that Australia has a problem with alcohol and 70 per cent think that more needs to be done to address alcohol-related harms.
- 35 per cent of Queenslanders have been affected by alcohol-related violence.
- Alcohol has never been more readily available in Queensland with one liquor licence for every 673 people.
- The excessive availability of alcohol is a significant contributor to alcohol-related harms, with increases in liquor outlets and trading hours both contributing to these harms.

The Queensland Government should implement a comprehensive evidence-based plan to address alcohol-related harms that targets the heart of the problem, the excessive availability of alcohol. This is such a plan.

The overwhelming majority of Queenslanders believe that Australia has a problem with alcohol (76 per cent) and that more needs to be done to address alcohol-related harms (70 per cent). Despite this, they do not conceive that these problems will be addressed anytime soon, with 81 per cent believing that alcohol-related problems will worsen, or at best remain the same over the next five to ten years.

The people of Queensland know all too well that the harms from alcohol can have devastating effects, with 35 per cent having been affected by alcohol-related violence. Queensland hospitals across the state are experiencing the burden caused by alcohol. In 2012 there were 91,783 alcohol-related emergency department presentations representing an increase of 31 per cent from 70,170 in 2007.

The harms from alcohol not only affect the drinker, but also impact on people in the broader community. Each year 367 people die in Australia because of someone else’s drinking and 70,000 people are victims of alcohol related assaults including 24,000 victims of domestic violence.

The Queensland Government now has an opportunity to demonstrate leadership by implementing a comprehensive plan of action that is based on the current evidence-base and best practice of what truly works to address alcohol-related harms.

Across Australia today, alcohol is more affordable than it has been in over three decades; it is more available than it ever has been and it is more heavily promoted. The ways that alcohol is sold, promoted and made available contribute to the way that alcohol is consumed and with that the associated harms. There is one liquor licence for every 673 people in Queensland. Increased availability of alcohol, both through the increased numbers of outlets and longer trading hours, contributes to alcohol-related violence and harms. Pubs and clubs are often the focus of policies to reduce alcohol-related harms. However, increases in take-away alcohol outlets also contribute to violence and domestic violence rates.

When looking at the price of alcohol, take-away alcohol is also often considerably cheaper than alcohol purchased at pubs and clubs, with wine being available for as cheap as 25 cents per standard drink. The promotion of alcohol is also prolific and is increasingly used as a marketing tool for alcohol products to the point that it has been coined as "ubiquitous" and "aggressive."
QCAA has prepared a plan of action for the Queensland Government which includes five evidence-based solutions to reduce alcohol-related harms. The plan acknowledges that no single strategy will reduce alcohol-related harms, and so instead a range of evidence-based strategies are required to achieve the best possible outcomes. There is a role for the Queensland Government in addressing the availability, price and promotion of alcohol through state based legislation and regulation.
The detail

1. Wind back late night trading hours and continue the moratorium on late night trading

Research on the relationship between the trading hours of licensed premises and alcohol-related harm consistently demonstrates that increased trading hours are associated with increased harms. Recent restrictions introduced in the New South Wales (NSW) city of Newcastle demonstrate how even modest reductions in the trading hours of licensed venues can substantially reduce alcohol-related harms.

In 2008, as a result of escalating local concern about alcohol-related violence, the NSW Liquor Administration Board imposed a number of restrictions on 14 licensed premises in Newcastle. The most notable of these restrictions was the introduction of a lockout from 1.00am for 14 hotels and bringing forward closing times. Closing times were changed to 3.00am for the 11 premises that were previously licensed to trade until 5.00am and to 2:30am for the three premises that had previously been licensed to trade until 3.00am. The lock out was later moved to 1:30am and the closing time to 3:30am following a legal challenge by the licensed premises and as a result of an out-of-court agreement with NSW Police.

An evaluation carried out in the 12 months following the introduction of these restrictions in Newcastle found that there was a 37 per cent reduction in alcohol-related harms when compared to a control site. This equates to a reduction of 33 assaults per quarter. The evaluation also found that there was no geographic displacement to the nearest late night district of Hamilton.

Studies have shown that the incidence of alcohol-related assaults increase significantly between 6.00pm and 3.00am, with the highest rates of alcohol-related assaults occurring between midnight and 3.00am. It has also been shown that over 40 per cent of assaults at licensed premises occur after midnight. Steps should be taken to limit venues for extended trading hours.

In 2009, the Queensland Government introduced a moratorium on applications for extended hours between 12.00am and 5.00am. The Queensland Government stated that these measures were introduced because ‘The community is increasingly worried about the level of alcohol-fuelled violence out there on our streets, not just the amount of violence but the increasing severity of it.’ The moratorium precludes new licensed premises or types of licensed premises (e.g. late trading premises) being opened in a specified area.

The moratorium applies to all extended trading hours applications currently before the Queensland Office of Liquor Gaming Regulation (OLGR). The moratorium was originally in place for 12 months and has now been extended until December 2013.

QCAA proposes that the Queensland Government legislate to introduce a 12 month statewide trial of the reduction of trading hours based on the Newcastle alcohol restrictions, including:

a) retain the current standard trading times of 10am to midnight and transition back to a 3am closure for extending trading permits
b) introduce lockouts at all extended trading permits from 1.00am
c) continue the moratorium on all late night trading across Queensland.
2. Control the density of licensed premises

Research has consistently found an association between alcohol outlet density and negative alcohol-related outcomes. Recently in Victoria, an analysis was undertaken of the effects of licensed outlet density on several measures including assault, domestic violence, chronic harms and high risk drinking in young people. The analysis found there was a strong association between reported assaults and all three outlet types, general licenses, on-licence and off-licence. A 10 per cent increase in general licence rates corresponded with a 0.6% increase in reported assaults, while a 10 per cent increase in off-licence rates corresponded with a 0.8% increase.

International studies have shown that increased outlet density can be linked to higher rates of road traffic accidents, drink driving or being a passenger of a drink driver, robbery, homicide, suicide (both attempted and completed), child maltreatment, deviant adolescent behaviours, sexual offences and sexually transmitted infections.

There are too many licensed venues in Queensland. In 2011-12 there were a total of 6,776 liquor licenses in Queensland. This equates to approximately one liquor licence for every 673 people in Queensland.

There are a number of policies that can be implemented to control the number of licensed outlets. Two of these policies are introducing “saturation zones” and “cluster controls”. Saturation zones impose limitations on the provision of new licenses in areas where it has been identified there are a high density of licenses. While cluster controls prohibit new liquor licenses for premises within a specified distance of existing licensed premises or other amenities (e.g. schools, hospitals, churches or places of religious worship).

Since 2005, local authorities in England and Wales (typically a council or borough) have been able to establish “saturation zones” within their licensing policies where no new licensed premises are permitted. These saturation zones are determined on the basis of existing outlet density levels and crime data including domestic violence statistics. The establishment of saturation zones and the basis for these zones is at the discretion of the individual local authority, but is not enacted in the National Licensing Act. Also, licence applicants have the right to appeal if they apply for a licence in a saturation zone and are refused.

“Cluster controls” are another policy measure that is designed to reduce alcohol-fuelled violence that results from the over-abundance of pubs and clubs. There are many examples of “cluster controls” internationally, for example in England and Wales, Paris and New York. New York has enacted “cluster controls” through their Alcohol Beverage Control Act. Since 1993 the legislation has included the “500 foot” (150 metres) rule which prohibits new on-premises licenses being issued within a 500 foot radius of three or more existing licenses. The rationale for such a measure is to ameliorate the potentially negative cumulative impact of areas that have high outlet density on public health, violence and crime. Similarly in Paris under the Code de La Sante Publique (public health legislation), there are protected areas within which new liquor licenses are prohibited if they are within 75 metres of a licensed premise of the same category.

QCAA proposes that the Queensland Government:

a) establish and enforces saturation zones in areas that are identified as already having large numbers of liquor licenses

b) introduce cumulative impact and cluster control policies for the determination of new liquor licenses.
3. Prevent the harmful discounting and promotion of alcohol

Evidence clearly shows that low alcohol prices result in high alcohol consumption and alcohol-related harms.\(^{22}\) The most significant government intervention to address low alcohol prices is tax and the establishment of minimum pricing policies. The Commonwealth Government is best placed to set the alcohol taxation rates at levels that minimise the harms caused by alcohol. However, there is also a role for states and territories to use their powers to prevent excessive discounting and promotion of alcohol products.

The Liquor Act 1992 currently allows for the Minister to prohibit the sale of a product that inappropriately targets young people, increases intoxication at rapid rates and/or encourages irresponsible use of alcohol. Additionally, the Liquor Act 1992 and the Liquor Regulations 2002 contain provisions to prohibit alcohol promotion in on-licensed premises. This includes banning the promotion and sale price of alcohol on the outside of on-licensed premises (eg. ‘Happy hours’ and ‘two drinks for the price of one’). While these price promotions are not allowed to be advertised on the outside of the licensed venue, they are permitted to occur within the license venue. The Act also prohibits promotional activities which encourage the rapid consumption of alcohol.

Despite these regulations alcohol is too frequently discounted and promoted at both on and off-licensed premises. Often such restrictions are only imposed once a venue has been reprimanded following complaints arising from alcohol-fuelled incidents. The Liquor Act 1992 should be strengthened to address harmful promotional activities on both on and off-licensed premises, and appropriately enforce them to ensure that they do not continue to occur.

QCAA proposes that the Queensland Government:

a) strengthens the Liquor Act 1992 to prohibit the harmful discounting and promotion of alcohol products on both on and off-licensed premises
b) ensure that these measures are enforced.

4. Enforce responsible service of alcohol requirements

All licensees and all staff that work in a licensed premise in Queensland are required to hold a Responsible Service of Alcohol (RSA) Certificate. RSA includes a range of responsibilities for licensees and people working in licensed venues including providing water and food to patrons, not serving alcohol to intoxicated persons and the service of alcohol in measures that reduce the risk of rapid consumption.

Recently, the Queensland Government introduced amendment to the Liquor (Red Tape Reduction) and Other Legislation Bill 2013\(^{30}\). While these changes did align the RSA Certificate to a National standard regulated by the Australian Skills Quality Authority, a relaxation in state regulatory mechanisms is noticeable with the removal of the requirement for licensees to keep a Responsible Service of Alcohol training register for staff and crowd controllers. The requirement for registered Managers to complete RSA training has also been removed.

For RSA practices to be effective, they need to be monitored, enforced and promoted. Without appropriate enforcement mechanisms, RSA measures have limited impact on the behaviour of people working in licensed venues and do not reduce alcohol-related harms.\(^{23}\) In Queensland RSA requirements are currently enforced by Queensland Police and Compliance Officers at the Office of Liquor and Gaming Regulation (OLGR). There is currently no legislative obligation for licensed premises to report on the compliance activities of OLGR or Queensland Police in undertaking their compliance activities.
In Queensland products designed to be consumed quickly are readily available for sale in licensed premises, such as ‘shots’, and those that include excessive amounts of alcohol, for example ‘doubles’ and some Ready-To-Drink beverages (RTDs). These products also contribute to the culture of ‘drinking to get drunk’ by encouraging the rapid consumption of alcohol to intoxication. Restricting the sale of products with the highest alcohol content will result in patrons at licensed premises having to select a product of lower alcohol content, resulting in a decline in the amount of pure alcohol consumed.

In addition to these alcohol products, alcohol mixed with energy drinks are becoming a major concern in the Australian community. FARE’s 2013 Annual Alcohol Poll found that 16 per cent of adult Australians have consumed alcohol mixed with energy drinks, and is highest among people aged 18-24 years, with 46 per cent of this age group reporting this. Energy drinks have been shown to mask the effects of intoxication. This can result in increased risky behaviours such as drink driving and even alcohol poisoning.

Internationally there have been moves to restrict the sale of alcohol and energy drinks and to increase awareness of the harms associated with these products, including a ban of the promotion of alcohol combined with energy drinks at sporting events in Ireland, and the prohibition of the consumption of energy drinks in Denmark.

RSA requirements assist licensed premises to provide a safe environment. However this does not occur if these are not appropriately enforced or policed. This enforcement cannot be left to licensed premises alone, but needs to be undertaken by Government to ensure that licensees are meeting their obligations under RSA.

**QCAA proposes that the Queensland Government:**

a) introduce measures to better enforce Responsible Service of Alcohol (RSA) requirements in licensed venues throughout Queensland, including Compliance Officers visiting licensed premises outside of regular business hours
b) introduce requirements for Office of Liquor and Gaming Regulation (OLGR) and the Queensland Police to publically report on compliance activities relating to the Liquor Act 1992, the number of venues inspected and their location, the times of day that these venues are inspected and the number of identified breaches of compliance
c) prohibit the sale of shots, mixed drinks with more than 30ml of alcohol and ready mixed drinks stronger than five per cent alcohol by volume after 10.00pm
d) prohibit the sale of alcohol mixed with energy drinks after midnight
e) prohibit the sale of more than four drinks to any patron at one time
f) introduce a requirement to provide free water stations on every bar.

### 5. Collect data on alcohol sales, consumption and harms

The collection of data on alcohol consumption and harms is vital to building the evidence-base for policies that are proven to reduce alcohol-related harms. Queensland is one of four jurisdictions that collect alcohol sales data. Sales data collected in Queensland relates to high, medium and low strength beer, wine, spirits and cider. Sales data is important as it provides the most accurate picture of Queenslanders’ alcohol consumption patterns, which in turn enables researchers, policy makers and the government to develop, implement and track the progress of evidence-based alcohol policies. The Queensland Government should be commended for collecting and reporting on alcohol sales data.

However there are significant gaps in the collection of alcohol-related data in Queensland. For example, there is a lack of available alcohol-related violence data in Queensland. This gap in data would be...
collection was also identified by the 2010 Queensland Legislative Assembly Inquiry into alcohol-related violence, which recommended that “the Government develop a comprehensive and consistent scheme involving all relevant departments for the collection and evaluation of data regarding alcohol-related violence.” Some work has progressed in this area with the introduction of three Drink Safe Precinct (DSP) trials in the designated entertainment precincts of Surfers Paradise (Gold Coast), Fortitude Valley (Brisbane) and Townsville. Designed as a collaborative government, non-government & business stakeholder model, the initiative is designed to reduce alcohol-related harm, including alcohol-fuelled violence. The DSP’s are directed by Advisory Groups and the Queensland Government should be commended for promoting inter-government information, resource and data set sharing as an ongoing feature of the model.

The collection and reporting of alcohol-related harm data is important to both informing developments in alcohol control policies and evaluating the effectiveness of alcohol control policies. Data on alcohol-related harms comes from a number of sources including police, hospitals and ambulance. This information needs to be effectively coded and recorded to inform the development of policies in reducing alcohol consumption and alcohol-related harms.

QCAA proposes that the Queensland Government:

a) continue to work collaboratively to improve processes for the collection and coding of alcohol harms data including data from police, ambulance services, and hospitals

b) continue the collection and publication of alcohol sales data in Queensland.
References

1. Galaxy Research, Alcohol Study, Prepared for the Foundation for Alcohol Research and Education (previously unreleased data).
2. Ibid.
8. Ibid
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