19 February 2010

National Drug Strategy Consultation
MDP 27
GPO Box 9848
CANBERRA ACT 2601

— BY EMAIL —

Dear Sir/Madam

Re: Brewers Association Response to National Drug Strategy Consultation Paper

The Brewers Association is an industry association representing Australia and New Zealand’s largest manufacturing brewers including Foster’s Group, Lion Nathan, Coopers Brewery, and DB Breweries. The Brewers Association is a policy-based organisation that has been representing its members in legislative and regulatory affairs in Australia since 1967 and in New Zealand since 2007. We maintain a presence in both Canberra and Wellington.

We welcome the opportunity to provide comment on the ‘Australia’s National Drug Strategy Beyond 2009 Consultation Paper’ (‘the consultation paper’), being undertaken by the Ministerial Council on Drug Strategy (MCDS).

Ours is a mature and responsible society where the majority of people enjoy alcohol in moderation, giving rise to a range of economic and social benefits. But Australia is not alone in that there are a few people who misuse and abuse alcohol, often deliberately. However, this need not lead to a situation where the irresponsible behaviour of a few imposes restrictions on and lessens the benefits of the many.

Alcohol misuse is universally unattractive. However, recognition of the benefits of moderate alcohol consumption should be the starting point for any successful public policy strategy. Importantly, this need not come at the cost of good policy outcomes, whether these be focussed on health, the economy or other policy concerns.

While industry undoubtedly has an interest in economic success, this need not be viewed as a zero-sum endeavour when considered alongside positive public health outcomes – this is an outdated mindset that immediately creates a false dichotomy between the public ‘good’ and the economic ‘bad.’ Indeed, Brewers Association members believe that their continuing economic success comes from promoting moderate consumption, with all its benefits, as the societal norm.

The Brewers Association strongly believes in targeted policy measures based on robust evidence, and we welcome the consideration given to this approach in the consultation
paper. Of course, in the Australian setting governments and associated bodies, such as the Council of Australian Governments, have a public commitment to evidence-based policy through adherence to the principles of best practice regulation, formally administered by the Australian Government Office of Best Practice Regulation. The Association’s commitment to these principles is evident through our longstanding support for and involvement with the ABAC Scheme – the centrepiece of Australia’s quasi-regulatory system of alcohol advertising regulation.

An evidence-based approach is sometimes risked through poor summarising of key research on key insights. An example of this is in the consultation paper itself (at paragraph two, page two). Reading this paragraph as a whole will give the impression that alcohol use costs taxpayers $15.3 billion per year, which is simply an untrue summation of the footnoted research. In fact:

- Collins and Lapsley were specifically commissioned to calculate costs, and not net these out by also calculating benefits; and their research gives a very specific warning about protecting the benefits of moderate alcohol consumption in policy development.

- These were not costs to taxpayers. In fact, Collins and Lapsley calculate a net benefit to taxpayers of over $4 billion.

Consistent with the body of scientific evidence, we support the notion – emphasised in the consultation paper – that great progress can be made through enhanced support for measures based on “…information and education, targeted social marketing campaigns, brief interventions and other psychosocial treatment…” The Brewers Association agrees with this position, and notes our long commitment to alcohol education in Australia through the Rethinking Drinking® project – a targeted program aimed at encouraging parents and students to discuss alcohol issues, building on our pre-existing Rethinking Drinking®: You’re in Control classroom teaching materials which are used in many Australian schools (see www.rethinkingdrinking.org).

Claims by anti-alcohol activists denying an effective role for education in culture and behaviour change simply beggar belief and we are pleased that the MCDS and its independent experts stand against these views by recognising the important role of education. Changing behaviour is a long and complex process and education programs like Rethinking Drinking® represent concrete steps towards a responsible drinking culture.

The consultation paper posits a role for “early intervention and diversionary approaches”. Such early intervention measures would directly address high risk drinking by some individuals which, on the evidence, would provide great gains for prevention without risking the dividend arising from moderate alcohol use for the majority of consumers.

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Police, justice, and emergency departments are very good at identifying individuals with potentially poor drinking habits, but much more policy work can be done on what is to be done once they are identified.

Such policies would see an increased focus on primary health care, emerging pharmacotherapies, and the targeting of high-risk sub-groups such as teenagers (and their parents), recidivist drink-drivers, and repeat offenders. Further investment in these areas could deliver real gains for prevention while recognising that the majority of Australian drinkers consume moderately and benefit from a significantly reduced likelihood of chronic disease compared to abstainers or heavy drinkers.

The Brewers Association welcomes the commitment to “cross-sectoral partnerships” outlined in the consultation paper, and we agree that these are essential to creating a coordinated approach to reducing drug-related harm. As the peak representative body for a major industrial sector, we consider that a partnership approach must necessarily extend to non-government and industry stakeholders, such as the Association and its membership, and we welcome your observation that “… there may be new opportunities to build partnerships with corporate and philanthropic organisations.”

As an aside to this issue, we note that the Brewers Association learned of consultation activities for the National Drug Strategy through a third-party information service (provided by a non-profit NGO), and not through any communication from the MCDS or official channels.

Of course, where cross-sectoral engagement and accessing external expert advice is very important, the MCDS must ensure that this advice is truly external and independent. To this end, steps should be taken to ensure that advisors are either paid by government, or lobby government, but never both – a legitimate concern given Australia’s closely networked and interdependent alcohol and other drugs advocacy sector which is heavily grants-dependent.

In the interests of public accountability, transparency and commitment to evidence-based policy, the Brewers Association considers that it is imperative that the National Drug Strategy contain publicly available performance measures. As a practical reality, we recognise the inherent difficulty in identifying agreed metrics or reliable secondary indicators of progress in the alcohol policy debate, and consider that this issue itself requires debate as a step towards any agreed outcome framework. However, as a general principle, we consider commitment to evaluate proposals against the principles of best practice regulation to be a necessary starting point in the development of any public policy framework.

I note that the consultation paper relies, in part, on recommendations of the Preventative Health Taskforce (PHT), through its Preventative Health Strategy. The Brewers Association has strong reservations about the approach and assumptions underpinning PHT conclusions, and we refer you to our submission to the Taskforce, freely available for download from the PHT website3.

If you should have any questions about this submission or our position on policy matters more broadly, I can be contacted by telephone on 02 6295 7199 or by email sswift@brewers-association.net.

I thank you for consideration of this submission, and we look forward to the release of the draft *National Drug Strategy 2010-2015* later in the year.

Yours faithfully

Stephen Swift
Executive Director