



Submission in response to the consultation paper on the “Requirement for wholesalers to report wholesale liquor supply information”

Executive Summary

- Alcohol policy development in Victoria will benefit greatly from the collection of wholesale alcohol sales data;
 - In order to maximise the benefit from this data collection, the draft regulations should be amended to:
 - permit release of the data (subject to appropriate confidentiality and de-identification requirements) to qualified researchers for the purpose of detailed analysis;
 - require the wholesale liquor supply information include the “date of delivery or date of dispatch” of the liquor the subject of the transaction;
 - explicitly provide for the use of the information in liquor licensing and planning decisions.
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The APC is grateful for the opportunity to participate in the consultation process on the draft regulations for the collection of wholesale liquor supply information. Monitoring per capita alcohol consumption is a critical tool for developing policy to address alcohol-related harm. Self-reported measures based on surveys of individuals have a number of limitations and generally underestimate actual levels of consumption. Sales data is therefore the preferred source of data upon which estimates of per capita consumption may be based. It will be a great benefit for Victorian alcohol policy development if localised wholesale sales data¹ can be used as an effective proxy measure to calculate alcohol consumption in a particular area.

The APC welcomes the introduction of wholesale alcohol sales data collection in Victoria and is pleased that a number of important categories of information will be captured for each wholesale liquor transaction. In particular, the APC supports the collection of supply information including: alcohol volume, type, dollar value, licensee number and postcode of delivery of the recipient licensee.

Overall, the APC is pleased with the proposed regulation for implementing the collection of wholesale liquor supply information but would like to raise a number of key deficiencies for consideration.

What information must be reported?

The Consultation paper lists a range of information that will be collected for each wholesale liquor transaction. In addition to what is currently specified, the APC submits that the

¹ Wholesale liquor transaction information (such as postcode of delivery or licensee number) can be used to calculate wholesale alcohol supply into a particular area.

required information should also include the “date of delivery or date of dispatch” of the alcohol which is the subject of the transaction. It does not appear from the Consultation paper that any temporal information will be collected. Collection of the date of delivery or dispatch will be critical for estimating and monitoring seasonal consumption patterns across the year, by season, month or week. This level of detail will enable researchers to more accurately evaluate the impact of policies. If this information is not collected, the data will only allow calculation of annual per capita consumption which is not as useful for evaluating and targeting policy interventions. By way of illustration, a VicHealth and Turning Point analysis of the past decade of hospital, ambulance and police data, shows violence and accidents related to alcohol, peak on most public holidays, as well as the day before.² A measure of per capita alcohol consumption would provide an additional means for monitoring the impact of seasonal events, such as public holidays, which can in turn be used to inform targeted policy development to reduce rates of alcohol-related harm.

What will happen to the information?

The APC supports the proposal to publicly release SA3 level consumption data on an annual basis. However, the APC is very concerned about the restrictions in the Exposure Draft that will prohibit provision of the information to anyone other than the Minister and employees of the department.³ Such a restrictive regime will severely limit the usefulness of the data and will undermine the purposes for which the data is collected. It will impede the ability of researchers and policy makers including Local Government, to make full use of the data.

The APC submits that data on individual transactions (with key identifying information suppressed) should be accessible to interested parties subject to agreements with the Department relating to the appropriate use and reporting of the data (to protect commercial sensitivities). Access to more detailed data (both in spatial and temporal terms) is a prerequisite for conducting detailed modelling of alcohol consumption in Victoria at a local level and to undertaking appropriate evaluations of local-level alcohol interventions. We recognise the privacy and commercial confidentiality issues involved in accessing this type of data, but suggest that a viable regime could be an approach similar to that used for other sensitive data in Victoria (e.g. hospital admissions, ambulance attendances).

If the restrictions on data release contained in the Exposure Draft remain, this will significantly undermine the usefulness of the data and the ability of policy makers including Local Government to make full use of this valuable data set.

Purposes for which wholesale liquor supply information may be used

The Exposure Draft currently provides that the wholesale liquor supply information may be used for the following purposes:

² Lloyd B, Matthews S, Livingston M, Jayasekara H. (2011). Drinking cultures and social occasions: Alcohol harms in the context of major public holidays and cultural events. Fitzroy, Victoria: Turning Point Alcohol and Drug Centre.

³ *Exposure Draft – Liquor Control Reform (Wholesale Liquor Supply Information) Regulations 2015* s 9.

- a) *The development, implementation and evaluation of policies to minimise harm arising from the misuse and abuse of alcohol; and*
- b) *Research into the relationship between alcohol consumption and the misuse and abuse of alcohol.*⁴

The APC welcomes these provisions but submits that the regulations should explicitly provide for wholesale liquor supply information to be used, where appropriate, in the consideration of licensing and planning decisions by interested parties including the Commission, Local Councils and Victoria Police. The primary aim of the *Liquor Control Reform Act* is to contribute to minimising harm arising from the misuse and abuse of alcohol, including by providing adequate controls over the supply and consumption of liquor.⁵ Accurate data about local alcohol consumption will be an invaluable tool in making informed decisions in accordance with the objectives of the Act.

Such uses are consistent with how the data is used in other states and territories as was acknowledged in the Second Reading Speech of Minister O'Brien who noted:

*“Wholesale alcohol sales data is collected in other Australian jurisdictions and used to measure and monitor total consumption of different types of alcohol, how consumption changes over time, to provide evidence in relation to liquor licensing applications, to allocate resources for alcohol-related public health and treatment programs and to evaluate the success of liquor licensing restrictions and other policy interventions.”*⁶ (emphasis added)

Conclusion

The collection of wholesale liquor supply information is a welcome step forward which will assist the development of evidence informed alcohol harm reduction policies in Victoria. The Exposure Draft requires a number of small amendments to ensure that the data collected can be used to its fullest extent to inform alcohol policy development in Victoria.

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⁴ *Exposure Draft – Liquor Control Reform (Wholesale Liquor Supply Information) Regulations 2015* s 8.

⁵ *Liquor Control Reform Act 1998* (Vic) s 4.

⁶ Victoria, *Parliamentary Debates*, Legislatively Assembly, *Gambling and Liquor Legislation Further Amendment Bill*, 6 August 2014.

About the Alcohol Policy Coalition

The Alcohol Policy Coalition is a collaboration of health and allied agencies who share a concern about the level of alcohol misuse and the associated health and social consequences for the community. The Alcohol Policy Coalition develops and promotes evidence-based policy responses that are known to be effective in preventing and reducing alcohol related problems. The members of the Alcohol Policy Coalition are:

- Australasian College of Emergency Medicine
- Australian Drug Foundation
- Cancer Council Victoria
- Foundation for Alcohol Research and Education
- Inner North West Melbourne Medicare Local
- Jewish Community Council of Victoria
- Public Health Association of Australia (Victoria)
- Royal Australasian College of Surgeons
- Salvation Army
- Turning Point
- Uniting Church, Synod of Victoria and Tasmania
- Victorian Alcohol and Drug Association

All the APC's partners have a strong track record in tackling major health issues in the community. The Alcohol Policy Coalition receives project funding from the Victorian Health Promotion Agency.