



NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that of a meeting of the **COMMUNITY SAFETY AND PLACE MANAGEMENT COMMITTEE** will be held:

DATE: Thursday 13 November 2014

TIME: 8.00am – 10.00am

PLACE: Councillors Room, Manly Council

COMMITTEE MEMBERS:

Councillors

Councillor Jean Hay AM, Mayor
Councillor Barbara Aird
Councillor Hugh Burns

Councillor Alan Le Surf
Councillor Candy Bingham
Councillor Steve Pickering

Other Representatives

Superintendent Dave Darcy
Mike Baird
Jono Noyes
Malcolm Pearce
Jacquiline Smith

Manly Police
NSW Member for Manly
Northern Beaches Health Promotion
Corrections NSW
Manly Community Centre
Manly Liquor Accord
State Transit Authority
Late Night Food Traders representative
Manly Drug Education & Counselling Centre
Community member
Community member
Manly Chamber of Commerce
Street Pastors
The Corso Precinct
Manly Youth representative

Wade Mitford
Sidar Demirbag
Susan Watson
Stuart Sprott
Ray Mathieson
Alana Smith
Deb Patenall

Cam Wall

Council Staff

Leanne Martin
Anita Ugarkovic

Community Safety Coordinator
Manager, Regulatory Services

All other Councillors are free to attend as observers and are invited to do so and to engage in discussions, but not in voting, on any matter before the Committee.

Kathryn Fayle

Divisional Manager, Human Services & Facilities

Date: November 2014



MEETING TO BE HELD ON THURSDAY 13 NOVEMBER 2014 AT 8.00AM

ITEM 1	Apologies and leave of absence
ITEM 2	Declarations of Interest – Pecuniary Non- Pecuniary
ITEM 3	Confirmation of Minutes of Meeting held on 9 October 2014 and Matters Arising
ITEM 4	Police Report
ITEM 5	Rangers Report
ITEM 6	Correspondence
6.1	Consideration of a submission to Competition Policy Review Draft Report
ITEM 7	General Business brought to the Attention of the Chair Prior to the Meeting and Approved for Consideration
ITEM 8	Date for Next Meeting – 11 December 2014



MINUTES OF MEETING

COMMUNITY SAFETY & PLACE MANAGEMENT ADVISORY COMMITTEE

HELD THURSDAY 9 OCTOBER 2014

NOTE: All minutes are subject to confirmation at a subsequent Ordinary Meeting of Council or Planning and Strategy Committee Meeting.

PRESENT:

Councillors

Cllr Jean Hay (Chair)
Cllr Alan Le Surf
Cllr Barbara Aird
Cllr Candy Bingham
Cllr Hugh Burns

Manly Council
Manly Council
Manly Council
Manly Council
Manly Council

Other Representatives

Supt David Darcy
Jacquiline Smith
Jonathon Noyes
Amanda Farrar
Ray Mathieson
Stuart Sprott

Northern Beaches Police Commander
Manly Community Centre & Services
Northern Sydney Health
NSW Member for Manly (staff rep)
Community Member
Community Member

Council Staff

Leanne Martin
Anita Ugarkovic
Eric Poulos

Community Safety Co-ordinator
Compliance Manager
Community Service Manager

TO THE MAYOR AND COUNCILLORS OF THE COUNCIL

The **Community Safety & Place Management Advisory Committee** met on Thursday 9 October 2014 to consider the matters referred to it and now provides the following advice to Council.

OPEN The meeting commenced at 8.00am.

ITEM 1 Apologies and Leave of Absence

Cllr Steve Pickering, Deb Patenall

Welcome: Guest Presenters Jenny Atkinson and Nick Dawkins

Resignations: Hania Norman, Amanda Watkins, Ged Dore
Susan Watson from MDECC will replace Amanda.

Replacements will be sought the two other representatives.
An appreciation letter will be sent to the three resigning representatives.

ITEM 2 Declaration Of Interest

Nil

ACTION

ITEM 3 Confirmation of Minutes of Meeting held on 11 September 2014 and Matters Arising

The September meeting minutes will be adopted at the Ordinary Meeting on 13 October 2014. The following information updates the committee on previous actions:

**3.1 Crime Prevention Projects - Grant Funded
Late Night Radio Project**

Infrastructure is now installed and the project is ready to proceed. It was planned to commence over the long weekend. Invoices for each of the seven participating venues have been sent by the radio supplier. Only two of the seven venues had paid for their radio handset by last weekend which means that the system will not be able to commence as planned until this has happened. Superintendent Darcy agreed that licensing police can encourage the outstanding licensees to get the project underway.

3.2 Taxi Security Scheme (Commonwealth Attorney General grant)

North Steyne late night taxi rank shelter: An on-site meeting has been held with JC Decaux, Community safety and Urban services staff to proceed with the installation which is intended to be in place by December. Staff advised that the parking bay on the western side of North Steyne had been previously considered for a late night transport stop however is not suitable for a taxi rank. Its limited size means that cabs would overflow onto the roadway. It also problematic because cabs must travel a lot further in order to access it. It would also impact on amenity of residents, who are much closer at this site than the beachfront location.

3.3 Market Lane Saturdays

A meeting was held with Community Safety staff and Meegan Clancy and Alana Smith from the Chamber of Commerce to assess options for Market Lane Saturdays. While options were explored, due to the short notice and lack of funding holding the event in 2014 is unlikely. The Committee was advised that the event organiser Sarah O'Brien is now implementing MLS successfully at Warringah and Parramatta Councils. The Committee expressed disappointment at the lack of funding to support this initiative. Various options were discussed to ensure some continuation of activation including ideas of extending World Food Markets into Market Lane.

Recommendation

The Committee recommends to the General Manager that the information be received and noted and conveys disappointment that funding for Market Lane Saturdays was not forthcoming.

ITEM 4 Police Report

Superintendent Darcy reported that

- Increased terrorism threat has resulted in patrols of Manly. There are a significant number of young radicalised men who could pose a threat to security. It is a sensitive location due to its high tourism profile as well as being the PM and Premier's home electorates.
- Lockouts – Manly has had the current regime of lockouts since 2008. Concerned that a challenging summer season may be ahead due to a number of significant changes amongst key licensed venues. Most impactful could be departure of Hotel

Steyne licensee Gerard Dore, who had built up valuable community support and a business model based on early closing times. The new owners business model differs and may be at the expense of safety. Phoenix restaurant is closed and could be replaced by more bars or nightclub. Mayor and Supt Darcy have had discussions with owners. This change together with a number of other local factors (such as reopening of Shore Club) may put a strain on the voluntary lockouts. Voluntary approach in Manly has worked rather than imposing laws. The Committee agreed to invite the new licensee to the next meeting to present his plans for the Hotel.

- A glassing occurred at a Manly hotel during the NRL grand final.
- Police Station redevelopment on track for completion by June 2015.

Recommendation:

The Committee recommends to the General Manager that the information be received and noted.

ITEM 5 Rangers Report

Monthly report tabled. Compliance Manager reported on:

- Manly Wharf Hotel ongoing complex complaints. Residents do not want ranger/police attending homes but do want noise stopped, which is difficult without evidence. Meeting being arranged with police to discuss a coordinated approach. Measuring the noise with noise meters will be better than the subjective assessment of "offensive" noise by the attending police.
- Complaints about use of East Esplanade park increasing with warmer weather. Committee agree that the major issue continues to be the amount of rubbish particularly bottles. Discussion about whether more bottle bins and/or more frequent clearing of bins is needed. Committee are aware of staffing issues but contend that this is an important safety issue to be addressed. It was agreed to ask if staff could report on current cleaning approach and consider plans for an increased regime this summer and the report be prepared for discussion at next month's meeting. Cllr Aird also asked that the report be referred for discussion at the Waste Committee.

Recommendation

The Committee recommends to the General Manager that a report be prepared on cleansing issues at East Esplanade park for discussion at next month's meeting.

ITEM 6 Correspondence
Nil

ITEM 7 General Business
7.1 Graffiti Removal Day

Graffiti Removal Day is on 26 October. It has been promoted by Council to all the Precincts. Harris Farm wall in Balgowlah Road has been nominated to the Graffiti Removal website in the Manly LGA. The graffiti removal day organisation, which is funded by the NSW Attorney General, will assess, provide equipment and coordinate volunteers to clean up. Further sites including Kangaroo Lane have been nominated. Local volunteers are needed and the Committee is encouraged to promote the day.

7.2 CDAT Stop the Supply Campaign 2014

Jonathon Noyes updated the committee on the new aspects of this summer's Stop the Supply campaign including distribution of bottle bags, stickers and posters to all bottle shops on the Northern Beaches; bus back posters campaign, creation of a 15 second video clip available for distribution; updating of the Stop the Supply website www.stopthesupply.org.au – which has information on underage drinking and the law and information which will be sent to all schools for inclusion in newsletters. The Office of Liquor Gaming and Racing as well as other CDATS across the State have picked up the campaign and are now using it in their areas. Superintendent Darcy will provide a quote for the editorial being prepared for the Manly Daily. He will also encourage more enforcement by his staff on underage supply in order to reinforce the Stop the Supply message.

7.3 Homelessness Initiative

Approximately two weeks ago Neil McWilliam, outreach worker from Manly Community Centre arranged an onsite meeting with lunch provided at the Manly oval grandstand. He organised for some key agencies such as Dept of Housing, Mental Health NSW, Nth Sydney Tenancy Advice, Mission Australia, Housing and Accommodation Support Initiative, Police and Centrelink. 15 clients turned up with about eight seeking genuine help. It also gave the agencies opportunity to see the types of spaces the homeless sleep in, which was apparently quite an eye-opener for them. As a result one of the long term homeless (from the beachfront shelter and oval) was given temporary motel accommodation and is now in a single room dept of Housing flat in Manly. Neil will continue to work in collaboration with these agencies and a more direct approach to accommodating local clients without the 'red tape' that the homeless find so confronting. This is a fantastic effort for our area made possible by both Neil and those agencies involved. There is also an article referring to this initiative in a newsletter from Northern Sydney Family and Community Services which will be distributed with minutes.

7.4 Tribesta Safety App

Tribesta is a local business that has developed a community safety related App for smartphones, which they believe would be of great interest to the committee. Jenny Atkinson and Nick Dawkins conducted a short presentation to the committee about the potential for improving personal safety using new technologies. Committee thanked the presenters and suggested that staff follow up potential for community pilot project with Tribesta.

Recommendation

The Committee recommends to the General Manager that the information be received and noted.

ITEM 8 Date for Next Meeting – 13 November 2014

Meeting closed 10.05 am



TO: Manly Community Safety and Place Management Committee
MEETING DATE: Thursday 13 November 2014
AUTHOR: Leanne Martin, Community Safety Coordinator
SUBJECT: Item 6.1: **Correspondence**

1. Introduction

Consideration of draft submission to the Competition Policy Review in regards to a proposal by the Australian Government that could lead to an increase in the availability of alcohol. As Manly Council is a member of NAAPA (NSW/ACT Alcohol Policy Alliance) they have written to us to consider the review and its impact

2. Information

- FARE (Foundation for Alcohol Research and Education) have prepared a brief that clearly explains the ramifications of the deregulation of the availability of alcohol.
- The 'Competition Policy Review Draft Report' (Draft Report) has made recommendations that have the potential to dramatically increase the availability of alcohol in Australia by:
 1. Removing restrictions related planning and zoning for alcohol outlets;
 2. Deregulating retail trading hours; and
 3. Reducing constraints on supermarkets being able to sell alcohol.
- FARE have prepared a draft letter to assist in submissions. There is an opportunity to include a paragraph specific to Manly with something such as: *"Manly has a long history of alcohol related crime, anti-social behaviour and other harms resulting from easy accessibility and high a concentration of alcohol outlets within a small radius. To increase the possibility of outlets and trading hours would be detrimental to the health and safety of our community, particularly our young people and it is not supported."*
- The background information and draft submission letter is attached for consideration. Submissions close on 17 November.

3. Possible Recommendations

That the Committee recommends to the General Manager that the submission as proposed by FARE is supported by the committee and that it be forwarded to the Competition Policy Review Secretariat from Manly Council.

Leanne Martin
Community Safety Coordinator
Manly Community Safety and Place Management Committee
30 October 2014

Attachments

1. Correspondence and attachments from FARE

Brief: Competition Policy Review's Draft recommendations and implications for alcohol harm reduction policies



Key points

- The Australian Government is currently undertaking a review of Competition Policy in Australia.
- The previous review of Competition Policy (in 1990s and 2000s) led to significant increases in the availability of alcohol across Australia and increased alcohol harms.
- Draft recommendations from the current review suggest the possibility of further weakening of regulations that govern the sale and supply of alcohol, these include:
 1. Removing restrictions related to planning and zoning for alcohol outlets;
 2. Deregulating retail trading hours; and
 3. Reducing constraints on supermarkets being able to sell alcohol.
- Submissions to the review are being accepted until 17 November 2014 and it is important that yours is included.

Alcohol is no ordinary commodity

Alcohol is considered by society to be a special product that requires laws and regulations about how and when it can be sold as well as who can consume it (i.e. legal drinking age). Society deems these restrictions to be appropriate due to the harms that alcohol causes.¹ Across Australia, legislation limits time when alcohol can be sold, where alcohol can be sold and the type of premise that can sell alcohol (i.e. off-licence or on-licence including restaurants, pubs, bars, club and nightclubs). These restrictions are both in the public interest and for the public's benefit.

Increases in the availability, affordability and promotion of alcohol are consistently demonstrated to increase alcohol consumption and increase social and health harms.² In Australia 15 people die and 430 are hospitalised due to alcohol each day, making the control of alcohol one of our nation's greatest preventive health challenges.³ The Australian public is concerned about alcohol and want action taken to reduce harms. A recent poll by the Foundation for Alcohol Research and Education (FARE) showed that the majority of the Australian public (79 per cent) believe that more needs to be done to reduce alcohol harms.⁴

Implications of the current Competition Policy Review

The Australian Government is currently undertaking a review of Competition Policy. This follows an earlier review which commenced in 1995 when all Australian governments agreed that: *"legislation (including Acts, enactments, ordinances and regulations) should not restrict competition unless it could be demonstrated that the benefits of the restriction to the community as a whole outweighed the costs."*⁵

Over a period of ten years (from 1995 to 2005) over 1,800 pieces of legislation were identified as potentially being anti-competitive and 85 per cent of these were reformed. Part of this program included the reformation of Liquor Licensing laws across all Australian states and territories.

In principle, National Competition Policy (NCP) acknowledged that the nature of alcohol necessitates regulatory controls that override Competition Policy objectives. However, in practice the first NCP review resulted in several states being heavily fined for refusing to liberalise their Liquor Licensing regulations. After being forced to reform their Liquor Licensing legislation, the number of licensed premises in Australia has significantly increased and this has contributed to the increased availability of alcohol, as well as alcohol becoming more affordable than it has been in over three decades.⁶ Both of these factors have contributed to increased harms. This has been most starkly seen in Victoria when between 2003 to 2012

licensed premises increased by 21 per cent, treatment episodes for alcohol rose by 28 per cent and ambulance attendances doubled.⁷

This current review of Competition Policy has significant implications for the sale and supply of alcohol in Australia and also the ability of state and local governments to respond appropriately to issues in their communities. The *Competition Policy Review Draft Report* (Draft Report) states that in the Panel's view: *"Liquor retailing and gambling are two heavily regulated sectors of the economy. The risk of harm to individuals, families and communities from problem drinking and gambling is a clear justification for regulation. However, there is **no case to exempt regulations** in these areas from ongoing review to ensure that they are meeting their stated objectives at least costs to consumers. The impact of regulatory restrictions on the ability of small businesses to compete should be considered as part of such reviews."* Page 108 (emphasis added).⁸

This means that the recommendations in the Draft Report will apply to the regulation of alcohol and Liquor Licensing in Australia and would significantly increase the availability of alcohol in Australia. These include:

1. Removing restrictions related to planning and zoning for alcohol outlets;
2. Deregulating retail trading hours; and
3. Reducing constraints on supermarkets being able to sell alcohol.

These areas are investigated below.

1. Removing planning and zoning restrictions

The Draft Report outlines that land use planning and zoning regulations by state and local governments restrict competition by being overly-localised in priority, favouring incumbent operators or creating barriers to new entrants to the markets.

Draft Recommendation 10 of the report states:

"All governments should include competition principles in the objectives of planning and zoning legislation so that they are given due weight in decision-making.

The principles should include:

- *a focus on the long-term interests of consumers generally (beyond purely local concerns);*
- *ensuring arrangements do not explicitly or implicitly favour incumbent operators;*
- *internal review processes that can be triggered by new entrants to a local market; and*
- *reducing the cost, complexity and time taken to challenge existing regulations."*

This recommendation has implications for alcohol policy as it may require local, state and territory governments to give equal or greater weight to Competition Policy, above addressing the social harms caused by alcohol.

Across Australia, Liquor Licensing applications are first considered by local governments with reference to local and state government planning laws that include land use planning as well as specific requirements on density and impacts on amenity.⁹ Licensing applications are also assessed by state licensing authorities such as the Office of Liquor Gaming and Racing in New South Wales (NSW). This recommendation would result in planning and zoning laws needing to consider the interests of Competition Policy above those of addressing or limiting the social harms caused by alcohol.

The recommendation may also limit the ability of governments to introduce policies that restrict or freeze liquor licence applications or late night liquor licenses, such as those that have been introduced in the

Sydney^a CBD and Melbourne.^b These measures have been introduced by governments as way to prevent anti-social behaviour and alcohol-related violence that has resulted from the increased availability of alcohol.¹⁰

Submissions to Competition Review Panel should recommend:

Submissions to the Competition Review Panel should highlight the potential that the deregulation of planning and zoning controls will have on state and local Government's authority to introduce appropriate harm reduction measures for alcohol such as freezes on new liquor licensing applications or types.

2. Deregulating retail trading hours

The Draft Report contends that the full deregulation of retail trading hours is overdue, and that remaining restrictions should be removed as soon as possible.

Draft Recommendation 51 of the report states:

"The Panel notes the generally beneficial effect for consumers of deregulation of retail trading hours to date and the growth of online competition in some retail markets. The Panel recommends that remaining restrictions on retail trading hours be removed. To the extent that jurisdictions choose to retain restrictions, these should be strictly limited to Christmas Day, Good Friday and the morning of ANZAC Day."

This recommendation has implications for alcohol policy as it may limit the ability for state and local governments to introduce policies that restrict the hours and days when alcohol can be sold, which is currently covered by state and territory government Liquor Licensing legislation. In addition to this legislation, additional restrictions are also implemented by governments to prevent alcohol harms or address particular issues being experienced. For example in NSW a new Sydney CBD Entertainment Precinct was established in January 2014. These laws restrict access to and sale of alcohol in licensed premises after certain times (1.30am) and last drinks to 3am. Takeaway alcohol sales across NSW were also restricted to before 10pm.¹¹

Restrictions on the hours when alcohol can be sold are often integral components of alcohol restrictions in rural and regional areas of Australia and critical features of Alcohol Management Plans in some Aboriginal and Torres Strait Islander communities.^{12 13}

Draft Recommendation 51 could result in trading hours for both on-licence premises (pubs, clubs and bars) and off-licence premises (takeaway or packaged liquor outlets) being extended. This raises significant concerns because increases in trading hours are associated with increased alcohol harms.¹⁴ A West Australian study found that a one hour extension of trading hours (from midnight to 1am) resulted in an increase in violent assault in or near licensed venues. The study also examined trends in assaults between 1991 and 1997 finding a 70 per cent increase in assaults per hotel per month for venues after extended trading hours were introduced.¹⁵

In addition this recommendation could significantly increase the availability of alcohol in the country. In Sweden when alcohol was able to be sold on Saturdays this resulted in 3.7 per cent increase in total alcohol consumption. A US study also found a 29 per cent increase in the daily rate of alcohol-related motor vehicle crashes after the removals of a state-wide band on Sunday sales of alcohol.¹⁶

^a A freeze on granting 24 hour liquor licenses was introduced by the New South Wales Government in October 2008 as a 'package of measures to crack down on anti-social behaviour and alcohol-related violence.' A freeze on new licenses in parts of the City of Sydney was introduced in 2009 and has been extended numerous times. For some parts of the city this freeze is in place until December 2015.

^b The freeze on new late night licensed premises in Melbourne CBD was introduced by the Victorian Government in 2008. This freeze has been extended several times since then and is now extended until 30 June 2015.

Submissions to Competition Review Panel should recommend:

Submissions to the Competition Review Panel should recommend no further deregulation of retail trading hours for alcohol.

3. Reducing constraints on supermarkets being able to sell alcohol

The Draft Report noted that a large number of submissions to the *Competition Policy Review Issues Paper* related to supermarkets, and notes that current legislation prevents supermarkets from selling alcohol and impedes competition. The Draft Report contends that the removal of these restrictions be prioritised as part of the renewed round of regulatory review as part of Draft Recommendation 51 (outlined above) and Draft Recommendation 11 (outlined below).

Draft Recommendation 11 of the report states:

"All Australian governments, including local government, should review regulations in their jurisdictions to ensure that unnecessary restrictions on competition are removed.

Regulations should be subject to a public benefit test, so that any policies or rules restricting competition must demonstrate that:

- *they are in the public interest; and*
- *the objectives of the legislation or government policy can only be achieved by restricting competition.*

Factors to consider in assessing the public interest should be determined on a case-by-case basis and not narrowed to a specific set of indicators.

Jurisdictional exemptions for conduct that would normally contravene the competition laws (by virtue of subsection 51(1) of the CCA) should also be examined as part of this review, to ensure they remain necessary and appropriate in their scope. Any further exemptions should be drafted as narrowly as possible to give effect to their policy intent.

The review process should be transparent, with highest priority areas for review identified in each jurisdiction, and results published along with timetables for reform."

Draft Recommendation 11 has implications for alcohol policy, as the sale of alcohol in supermarkets is likely to increase access to alcohol as well as the physical and economic availability of alcohol. In turn this will increase alcohol consumption in Australia and increase resultant harms.

Research evidence both internationally and in Australia demonstrates that increases in the number of outlets that sell packaged liquor either through supermarkets and other off-licenses is associated with increased rates of chronic disease, risky drinking by young people and domestic violence.¹⁷ Research in Victoria in 2011 found a 10 per cent increase in off-licence liquor outlets is associated with a 3.3 per cent increase in domestic violence.¹⁸ Internationally, increases in outlet density have been 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.¹⁹

The ability to sell alcohol through supermarkets is also likely to increase the market domination of larger supermarkets such as Woolworths and Coles and lead to reduced competition in Australia. Woolworths and Coles already own 59 per cent share of liquor retailing market in Australia and stock over 100 private label brands of wines making it difficult for consumers to distinguish between actual and real competitors.²⁰ IBISWorld highlight that Coles and Woolworths already use their market domination to "strike favourable agreements with alcohol producers, discounting some liquor products to levels that independent retailers have struggled to compete with. The supermarkets have also exploited their market position to reduce shelf space dedicated to branded products and push their own, higher margin private

and control-label beer and wine.”²¹ This situation is likely to worsen through changes to Competition Policy.

In addition if all supermarkets are able to sell alcohol then it will lead to alcohol being used further as a ‘loss leading’ product. This is a practice whereby retailers sell alcohol for less than wholesale or cost price to raise sales on other products that are full price. This practice is already occurring with IBISWorld noting in 2011 that supermarkets are increasingly using their market power to push their own label wines. They do this by cutting the prices of own brand labels to undercut other products and undermine producers’ profitability.²² This practice is of concern because international evidence clearly shows that lower alcohol prices result in higher consumption, including heavier drinking, occasional drinking and underage drinking.²³

The sale of alcohol at supermarkets also leads to changes in how alcohol is consumed by the population. In England where supermarket alcohol sales account for 50 per cent of all alcohol sold in the country, the increase in home drinking has been associated with increased consumption, as most drinkers are unaware how many standard drinks they are consuming and are unlikely to stick to national safe drinking guidelines.²⁴ Alcohol Concern in the UK has noted that unlike tobacco, alcohol products are located in numerous positions within supermarkets (beyond an aisle specifically for alcohol) including “doorways, checkout areas, end-of-aisle displays, and free standing displays. They also frequently undertake ‘cross-merchandising’, whereby drinks are displayed next to matched food items to encourage purchases. Very often such drinks are available at discount prices. Such practices fuel the acceptability of alcohol in society, reinforcing the notion that alcohol is a normal and desirable part of our culture, rather than an intoxicating and potentially harmful drug.”²⁵

The situation in the United Kingdom has forced countries like Scotland to seek to introduce legislation to limit these promotional and ‘loss leading’ practices by supermarkets after having recognised the harms it causes.²⁶

Submissions to Competition Review Panel should recommend:

Submissions to the Competition Review Panel should recommend that supermarkets not be allowed to sell alcohol and that no further deregulation of alcohol be pursued.

Submissions to Draft Report

The Competition Policy Review Panel is seeking submissions on the recommendations within the Draft Report by 17 November 2014. Areas of concern have been highlighted in this briefing.

The recommendations in the Draft Report may undermine the ability for state and local government authorities to respond appropriately and introduce controls on the sale and supply of alcohol to their local areas.

The experience from the previous Competition Policy Review is that it led to significant increases in alcohol’s availability, reductions in alcohol’s price and left a significant toll of alcohol harms being felt by all Australians. The recommendations within this Draft Report could result in further increases in alcohol’s availability and subsequent harms.

References

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INSERT DATE

Professor Ian Harper
Competition Policy Review Secretariat
The Treasury
Langton Crescent
PARKES ACT 2600
contact@competitionpolicyreview.gov.au

Dear Professor Harper

SUBMISSION TO THE COMPETITION POLICY REVIEW

Thank you for the opportunity to provide a submission to the *Competition Policy Review Draft Report* (Draft Report).

I/we am/are concerned that the recommendations made in the Draft Report will greatly increase the availability of alcohol in Australia and lead to significant increases in alcohol harms. I/we would like to offer my support to the submission prepared by the Foundation for Alcohol Research and Education (FARE). FARE is an independent not-for-profit organisation working to stop the harm caused by alcohol by joining with communities, governments, health professionals and police across the country.

Alcohol is not like other products such as orange juice or cornflakes, it is a product that requires special laws and restrictions about where it can be sold, when it can be sold and who can consume it. These regulations reflect the harm that alcohol can cause and are both in the public interest and for the public's benefit. Alcohol should not be subject to same economic principles as cornflakes and orange juice as neither of these, when you increase their availability, will cause significant harm in the community.

The Draft Report states that the aim of Competition Policy is to "*improve the welfare of Australians*" but the recommendations outlined in the Draft Report will not achieve this, as they will lead to the increased availability of alcohol and increased harms. The previous review of Competition Policy resulted in vast increases in number and types of premises selling alcohol across Australia. This has contributed to alcohol-related harms which include 15 deaths (62% increase in ten years) and 430 hospitalisations each day.¹

INCLUDE INFORMATION HERE ABOUT YOUR EXPERIENCE/KNOWLEDGE OF ALCOHOL HARMS AND/OR HOW COMPETITION POLICY LEADS TO INCREASED HARMS.

OR DELETE THE SECTION HIGHLIGHTED IN YELLOW IF YOU WOULD LIKE IT TO BE A GENERIC SUPPORT LETTER.

Thank you once again for the opportunity to raise these important issues with you.

Yours sincerely

NAME

ORGANISATION (IF REPRESENTING AN ORGANISATION)

¹ Gao, C., Ogeil, R. and Llyod, B. (2014). Alcohol's burden of disease in Australia. Canberra: FARE and VicHealth in collaboration with Turning Point