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Honourable Yvette D'Ath MP  
Attorney General for Queensland  
1 William Street, Brisbane  
Queensland, 4000



07/06/2024

**RE: Act now on family and domestic violence and regulate the online sale and delivery of alcohol**

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being for all. PHAA seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

Family, domestic and sexual violence is at crisis point. As you know, there are a range of complex and societal determinants of this violence, and all levers to reduce and stop the violence must be utilised.

Alcohol harm reduction policy is one of these evidence-based and implementable levers. Alcohol is involved in [between 23% and 65% of all police-reported family violence incidents](#), yet Queensland does not have specific regulations for the online sale and delivery of alcohol.

The Queensland Government is creating a regulatory framework for the online sale and delivery of alcohol, however, the initial draft framework does not do enough to protect families from alcohol related violence.

For instance, there was no proposed time delay between purchase and delivery of alcohol, to stop the rapid supply of alcohol to people. Yet [77% of rapid delivery users report that they would not have continued](#) to drink during a session if rapid delivery was unavailable. Also, the restriction on delivery hours could be strengthened, as [alcohol-related assaults increase at night](#), with most of these assaults occurring at home.

PHAA strongly recommends that the Queensland Government implements the following core regulations to help protect Queensland families and communities from family, domestic and sexual violence:

- Prohibit all alcohol deliveries between 10pm and 10am, and institute a minimum two-hour delay between purchase and delivery.
- Enforce the law regarding unattended deliveries and deliveries to intoxicated persons and minors.
- A separate licence for online delivery with appropriate community engagement and impact assessment.
- Ensure the integrity of online sales systems, including effective age verification, mandatory health warnings, and banning predatory marketing behaviour and payment methods.
- Support delivery providers through online delivery-specific Responsible Service of Alcohol training and ensure compliance through test purchasing and regular reporting.
- Establish offences for the irresponsible provision of alcohol, ensuring delivery companies are liable.

Please do not hesitate to contact PHAA (via email at [policy@phaa.net.au](mailto:policy@phaa.net.au)) should you require additional information or have any queries about reducing the harm caused by alcohol.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Amie Steel".

Associate Professor Amie Steel  
Queensland Branch President  
Public Health Association of Australia

A handwritten signature in black ink, appearing to read "Terry Slevin".

Adjunct Professor Terry Slevin  
Chief Executive Officer  
Public Health Association of Australia