



**Public Health Association**  
AUSTRALIA

# Public Health Association of Australia submission on the ACT Regulation of Same Day Liquor Delivery Providers Discussion Paper

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## Preamble

### The Public Health Association of Australia

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 of all Australians. It is the pre-eminent voice for the public's health in Australia.

The PHAA works to ensure that the public's health is improved through sustained and determined efforts of the Board, the National Office, the State and Territory Branches, the Special Interest Groups and members.

The efforts of the PHAA are enhanced by our vision for a healthy Australia and by engaging with like-minded stakeholders in order to build coalitions of interest that influence public opinion, the media, political parties and governments.

Health is a human right, a vital resource for everyday life, and key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people's health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

All members of the Association are committed to better health outcomes based on these principles.

### Vision for a healthy population

A healthy region, a healthy nation, healthy people: living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health for all.

The reduction of social and health inequities should be an over-arching goal of national policy and recognised as a key measure of our progress as a society. All public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.

### Mission for the Public Health Association of Australia

As the leading national peak body for public health representation and advocacy, to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.



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## Introduction

PHAA welcomes the opportunity to provide input to the Regulation of Same Day Liquor Delivery Providers Discussion Paper.

In Australia, alcohol is the most widely used drug.<sup>(1)</sup> Alcohol consumption is deeply embedded in Australia's culture, as its regular use is vastly perceived as acceptable for the purposes of socialisation, relaxation and/or commiseration.<sup>(2)</sup> However, alcohol-related harms are responsible for a substantial burden of death, disease and injury in Australia, which is influenced by not only unsafe drinking patterns but by the interactions between age, genetics, physical, cultural, social and environmental determinants of health.<sup>(3)</sup>

Alcohol is the fifth leading risk factor to the burden of disease in Australia, contributing to several cancers, chronic liver disease and injuries such as road incidents and self-inflicted injuries.<sup>(4)</sup> In the Australian Capital Territory (ACT), there are almost 100 alcohol-attributable deaths and 1500 alcohol-attributable hospitalisations annually.<sup>(5)</sup> Yet, between 2016 and 2021, the proportion of ACT adults who identified as risky drinkers significantly increased from 20.4% to 29.2%.<sup>(6)</sup> Almost half (43%), of Canberrans receiving treatment for drug use identified alcohol as the principal drug of concern.<sup>(7)</sup>

The online sale and delivery of alcohol has rapidly increased over recent years, particularly due to the COVID-19 pandemic altering purchasing habits.<sup>(8)</sup> In 2020, the online sales and delivery of alcohol more than tripled 2019 figures.<sup>(9)</sup> Consequently, research into the impacts of online sale and delivery of alcohol is still being generated and the required regulatory measures are playing catch-up. PHAA is deeply concerned about the increased risk that underregulated online sale and delivery of alcohol has on alcohol-related harms in the ACT community.<sup>(10)</sup>

## PHAA Response to the Regulation of Same Day Liquor Delivery Providers Discussion Paper

### Prevent late night delivery

The discussion paper indicates that home delivery of alcohol can trade from 7am to 11pm from Monday to Saturday; and 9am and 11pm on Sunday. No changes are proposed for these times in the discussion paper.

Time is an important factor affecting levels of alcohol harm. Alcohol-related assaults increase substantially at night, peaking between midnight and 3am, with most assaults occurring in the home and involving domestic violence.<sup>(11)</sup> Additionally, suicides and sudden or unnatural deaths involving alcohol predominantly happen at night, in the home environment.<sup>(12,13)</sup>

Considering the evidence regarding the risk of violence, suicide and unnatural deaths, the current alcohol delivery timeframe is inappropriate.

### PHAA Recommendation

- Limit late-night alcohol deliveries to 10am-10pm, every day of the week.

## Prevent rapid delivery

The Discussion Paper states that “a shorter window for rapid delivery will be considered to minimise alcohol related harm”.<sup>(14)</sup> PHAA appreciates this reconsideration; for if the ACT Government reviews the evidence regarding how rapid delivery does influence increased drinking, then in the interest of minimising alcohol harm, a minimum 2-hour delay from ordering to delivery will be legislated.

Rapid delivery enables the delivery of alcohol within 30 minutes from ordering.<sup>(15)</sup> Current research illustrates that same-day and rapid delivery of alcohol is associated with six times higher odds of people drinking at hazardous/harmful levels,<sup>(16)</sup> as people tend to extend drinking sessions that might have normally ended, and targets people who drink at high-risk levels or are experiencing alcohol dependence.<sup>(17)</sup>

### PHAA Recommendation

- Introduce a minimum 2-hour safety pause between the order and delivery of alcohol products.

## Effective Identification (ID) checks

PHAA supports the ACT’s introduction of ID checks for online alcohol sales at point of purchase via Australia Post Keypass ID and point of delivery via government issued ID document and the amendments that bar alcohol from being left unattended, delivered to someone who is intoxicated, or to a minor.<sup>(14)</sup>

### PHAA Recommendations

- Full implementation and enforcement of new alcohol delivery and purchasing amendments.
- Introduce test purchasing to ensure compliance with online sales and delivery of alcohol laws. Appropriate penalties must be enforced for non-compliance.
- Capture data on the demographics of people accessing the service and the frequency of incidents (e.g., refused deliveries). Government and health bodies to utilise this data to create evidence-informed policies and it assists in calculating alcohol outlet density in a geographic area.

## Support delivery staff

### 1. Delivery-specific responsible service of alcohol (RSA) training and licencing

The ACT currently has no specific requirements for delivery staff to have RSA training or a liquor licence.<sup>(18)</sup> PHAA does not support the ACT Government’s legislative amendments for delivery staff to do RSA training specifically tailored to the rapid alcohol delivery. As stated, rapid delivery of alcohol is an unnecessary, harmful risk to individuals and the community. There should be no rapid delivery category.

RSA training should be maintained by all delivery staff responsible for the delivery of alcohol (same-day and non-same day). Rapid delivery should be limited to a minimum time window of 2 hours.

Additionally, there is no licence category for the online sale or delivery of alcohol.<sup>(18)</sup> The Government should establish a separate, specific licence category for entities that deliver or sell alcohol online. This will reduce the number of exclusions and exemptions required, and more closely target the specific entities involved. Without this, the Government has limited oversight and less compliance enforcement options.

### PHAA Recommendations:

- RSA training should be obtained by all alcohol delivery staff. Deliverers should have further support and education regarding their rights and responsibilities, as well as de-escalation techniques.

- A specific licence category must be created for entities that sell alcohol online and deliver alcohol.

## 2. Liability of delivery providers

The ACT discussion paper outlines that safeguards will be implemented to ensure delivery drivers are not penalised by the licensee for non-deliveries due to RSA requirements.<sup>(14)</sup> PHAA supports this, particularly in light of the New South Wales (NSW) Alcohol Delivery Reforms (Stage 1) findings which illustrated that one in 10 drivers who refused a delivery had been penalised by their employer.<sup>(19)</sup> Drivers should be supported to refuse alcohol supply if appropriate and never be penalised for making such a determination.

### PHAA Recommendations:

- Make delivery companies (including bottle shops and online companies), liable for delivery breaches, such as delivery to children or people who are intoxicated.

## Predatory marketing and Industry self-regulation as a conflict of interest

Alcohol is addictive and harmful, yet alcohol retailers continuously promote alcohol delivery, alcohol specials and drinking at home.<sup>(20)</sup> All while internet user's data and information are collected from search engines, e-commerce platforms and social media.<sup>(21)</sup> Resulting in people's data being analysed, sold and used to create personalised advertising, tailored and targeted towards their interests and preferences.<sup>(21)</sup>

This becomes problematic for at-risk populations, such as children, young adults and people experiencing alcohol dependence.<sup>(21)</sup> Predatory marketing tools, like incentives to buy alcohol via 'Show Now' buttons, buy-now-pay-later schemes, push notifications, discounts, minimum spend deals, etc., all influence impulsive buying that can extend to same day or non-same day online sales and delivery of alcohol.<sup>(20)</sup>

Yet, this Discussion Paper has no proposals to address marketing behaviours or introduce health warning statements. The Paper states that alcohol providers need to include "safeguards to ensure customers can self-exclude from liquor delivery services and promotions without further contact from the provider".<sup>(14)</sup>

Industry self-regulation of alcohol marketing is a clear conflict of interest, as the alcohol industry intends to make profits out of increased alcohol sales. Self-regulation does not protect vulnerable groups and continues the promotion of harmful alcohol messaging.<sup>(22)</sup> The self-regulation of alcohol marketing by the alcohol and advertising industries has failed to protect young people and the general community, and should be replaced by independent, government-led regulation with sanctions for non-compliance.<sup>(23,24)</sup>

A legislative approach is required. Regulation by government can ensure effective, independent controls on all forms of alcohol advertising and promotion, focusing on strong privacy reforms and minimising the harms from digital marketing that promote same day and non-same day alcohol delivery services.

### PHAA Recommendations:

- Prevent predatory marketing by alcohol companies that promotes excessive and rapid alcohol use, by prohibiting direct links from advertisements to alcohol retail, such as push notifications.
- Extend the 'Responsible Promotion of Liquor Guidelines' to apply to digital marketing, online sales, delivery and takeaway. Expand these guidelines to capture examples directly relevant to online retail marketing. Grant the commissioner discretion over determining which other marketing practices is also harmful in addition to the listed examples.
- Appropriate sanctions must be in place for any non-compliance of the strengthened regulation.



- Require alcohol companies with online advertising, to clearly display on their websites at least three prescribed rotating health warning statements about the risk of harm from alcohol, with a link to the Australian guidelines to reduce health risks from drinking alcohol.

## Improve data collection and reporting

In NSW, the reporting requirements for alcohol delivery providers has been critical for Government; enabling easier data collection on the demography, frequency, volume and types of alcohol delivery.<sup>(25)</sup> The reporting of alcohol delivery data also captures the frequency of incidents, like refused delivery.<sup>(26,27)</sup>

Furthermore, the reporting of alcohol delivery data provides evidence that will assist policymakers and other stakeholders to make informed, evidence-based policies and regulations to reduce alcohol harms.<sup>(28)</sup>

PHAA supports the Paper's proposal to capture delivery data and record incidents of refused delivery for same day liquor delivery services, thus creating a report of this data to Access Canberra annually.

However, this reporting should extend to non-same day delivery. The risk of harm from alcohol to individuals, families and communities remains, regardless of same or non-same day delivery. Reporting non-same day data also establishes supply density and presents the full picture of online sale and delivery of alcohol in the ACT.

### PHAA Recommendations:

- Collect same-day and non-same day alcohol delivery data.
- Report delivery data such as refused deliveries and volume of alcohol sold online and delivered, by geographic area to regulators (e.g., by Local Government Area), to enable monitoring of deliveries, frequency of compliance issues and for a more accurate calculation of alcohol supply density.
- Publish frequent reports on monitoring and enforcement activity including online sales data, and delivery data such as refused deliveries.

## Genuinely protect the community

The evidence demonstrating the association between the density of alcohol outlets and increase in alcohol-related harm is abundant.<sup>(29,30)</sup> The ACT *Liquor Act* requires consideration of harm minimisation and community safety aspects of the proximity of alcohol outlets.<sup>(18)</sup> Communities should have a say as to the density of alcohol providers in their environments.

The Discussion Paper does not include reference to public consultation for online sales and delivery of alcohol. Liquor licence applications are the opportunity for a community to be involved in the decision-making process. Providing a platform to share concerns about the potential impact of increased access and supply of alcohol. Yet without a specific licence category for online sales and delivery businesses to apply for, no associated public consultation process is triggered by such licence applications.

There must be an equivalent process for assessments to be made and for the community to be heard regarding availability of online sales and delivery of alcohol in their area.

Improvements can be made to current community consultation processes also. As is, the process has a power imbalance where alcohol companies can run protracted appeals and defences as they have finances and resources for legal and planning advice. Impacted and concerned communities do not.

### PHAA Recommendations:

- Improve community access, information and support for engaging with licence applications.
- Provide resourcing for targeted and independent support for members of the public impacted by increases in liquor supply density.
- Engage with all relevant stakeholders to ensure the consultation process is informed by relevant expertise of alcohol harm.
- Consult with the community and conduct a community impact statement to identify their voice, needs, expectations and aspirations for their community. Including prescribing an effective community impact process, (e.g., community impact statement), for online sales and delivery, publishing full licence applications with risk-assessment management plans.

### Other comments

#### Scope of 'same day' delivery

A review of *non-same day* delivery should not be excluded from the scope of the consultation, when the risk of unattended, late night, intoxicated and underage delivery is the same for non-same day delivery.

#### Two-year review

The commitment to a 2-year review of the new regulatory framework is welcomed.

## Conclusion

PHAA supports the direction of the Discussion Paper on the Regulation of Same Day Liquor Delivery Providers, however, we urge the inclusion of key policies to bolster online sales and delivery legislation:

- Limit late-night deliveries, prevent rapid delivery, bolster online and delivery identification checks.
- All delivery drivers must have RSA training, receive safety support and must not be penalised for non-deliveries. Alcohol companies must be liable for compliance breaches.
- ACT government must regulate the marketing of alcohol products, including data driven digital marketing, sanctions for non-compliance and health warnings on retailer's websites.
- All same day data reporting must apply to non-same day.
- Protect the community by introducing a separate liquor license for alcohol delivery and improving community consultation practices.

Please do not hesitate to contact me should you require additional information or have any queries in relation to this submission.



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14/09/2023



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