

20 November 2015

Darren Button
Associate Director
Health Outcomes International

Via email: darren@hoi.com.au

Dear Darren,

National Alcohol Strategy Discussion Paper - Submission

The Winemakers' Federation of Australia (WFA) is the peak national industry body for Australia's winemakers. As the lead representative advocacy body for winemakers, we welcome this opportunity to comment on the discussion paper and assist in the development of the National Alcohol Strategy 2016 – 2021.

The comments in this letter constitute our formal submission to Health Outcomes International (HOI), as the Commonwealth's appointed contractor for the management of stakeholder consultations on behalf of the Intergovernmental Committee on Drugs (IGCD). We have also completed the online survey which we note was a requirement for being eligible to make an actual submission.

Given the National Alcohol Strategy (NAS) is a sub-strategy of the overarching National Drug Strategy (NDS) it is important to restate our concerns with the draft NDS and for which we separately provided a submission (Attachment .1.) and wrote to health ministers about (Attachment .2.). Our concerns with the draft NDS can be summarised as follows:

- There was no differentiation in approach between alcohol, a legal substance that can be consumed at safe levels, and tobacco and illicit drugs, for which there are *no* safe levels of use.
- The terms "use" and "harm" were then used interchangeably, applying to alcohol as well as to tobacco and to illicit drugs.
- There was no acknowledgement of there being safe levels of alcohol consumption.
- There was no acknowledgement of alcohol's legitimate place in Australian society or that the vast majority of Australians consume it responsibly.
- There was no goal or objective of promoting a message of moderation for alcohol consumption.
- Instead, "encouraging cessation" and "reducing acceptability of use" are objectives and 'whole-of-population' strategies to reduce overall consumption were the focus, with little or no emphasis on targeting reductions among known at-risk groups.
- There was no mention of collaborating with the alcohol industry.
- There was selective use of statistics (including discredited research and unpublished/reviewed works), often suggesting that *all* Australians engage in risky alcohol consumption which gives rise to a narrative of 'crisis' throughout the whole NDS.

- Assertion of there being a 'crisis' was then used to justify the need for population wide measures such as pricing controls (minimum pricing, tax hikes, etc.).
- The most recent ABS and AIHW data showing declining levels of consumption and a reduction of consumption by some at risk groups, such as young people was excluded from the evidence base.
- The importance of "evidence" was stressed but there was little evidence provided for the underpinning of the strategy. There was also no analysis of what worked and didn't work from the last strategy.
- Vague measures of success where there should be clear milestones and KPIs.

The discussion paper on the National Alcohol Strategy is similarly disappointing and many of the concerns we expressed on the draft NDS are applicable to the discussion paper also.

It is difficult to understand how a new or reimagined strategy can be developed without first conducting robust and transparent analysis of what worked, and didn't work, with the last National Alcohol Strategy (NAS). This lack of an independent, published foundation assessment weakens the evidence base for this new iteration and is at odds with the assertion in the document that "a commitment to using the evidence base to inform decisions and strategies is vital". A genuine and demonstrable commitment to rigorous analysis should be applied all the way through the process, from beginning to end. This is important in of itself but also for the credibility of the eventual strategy and the confidence that the community and all stakeholders can have in it.

The section titled 'Policy Context' is grossly incomplete and as with the draft NDS, cherry picks from selected data to generate an overwhelmingly negative narrative that permeates the entire document. At no stage does it include ABS statistics or AIHW data indicating significant improvements in at-risk indicators over time and instead refers to questionable research produced by FARE that disputes the data collected by the Government's own statistics experts. The fact is, the Australian drinking culture is changing for the positive and that is welcomed. More must be done to encourage moderation but this is completely absent from the commentary in the discussion paper. At one point the strategy lauds the success of the past strategy in 'addressing alcohol-related harm' and yet the strategy's policy context states that "risky drinking and alcohol harm is increasing".

The 'Overarching Goal' is also incomplete. There is no engagement or reference to the priority goal of promoting moderation. It is bewildering as to why this is not included in the overarching goal. In this regard, consumption of alcohol is different from illicit drugs and tobacco (i.e. there are safe even beneficial outcomes associated with moderate consumption) but this is not acknowledged. In our response to Health Ministers on the NDS (Attachment .2.) we have requested that alcohol be taken out of the NDS process given the lack of acknowledgement in the strategies for this crucial difference and the almost ideological zealotry demonstrated by the process to treat alcohol, illicit drugs and tobacco seamlessly. This is an unacceptable policy approach.

Perhaps most perplexing is the absence of any statement articulating a vision for Australia's future drinking culture. A clear vision is needed to provide the whole strategy with a focal point and a primary goal and to give proper context to all the individual components of the strategy. To focus solely on harm minimisation is to deny the legitimate place that wine and indeed alcohol have in Australian society as a heavily regulated, legal drug that is enjoyed responsibly by the vast majority of Australians.

The 'Guiding Principles' have no reference to accountability and how the strategy can be assessed as it unfolds. Performance benchmarks must be included in the draft strategy to give it rigour and to engender public confidence. Appropriate targets should be set against the overarching goal which should be extended to include a measure of any improvements in the rate of moderate consumption and what progress has been made in shifting the drinking culture further towards acceptable cultural norms in regards to alcohol consumption. The discussion paper suggests 'comprehensive monitoring and surveillance systems will be essential for determining progress and effectiveness' but provides no detail of what these are, how results will be communicated to stakeholders and what remedial action will be taken if results are underwhelming during the course of the strategy. What exactly are the 'milestones' the NAS wants to achieve? It is not clear.

The section on 'Working in Partnership' excludes any reference to the alcohol industry. Probably as a result of omitting any goals around moderate consumption, the industry's ability to speak directly to consumers (such as via cellar door engagement, on and off premise sales, on-line sales) is completely ignored. WFA believes no successful consumer or community facing campaign can be implemented without the assistance of the alcohol industry. It is a resource that governments can and should leverage. Again, a lock out of alcohol industries from the process seems ideologically driven and ignores our proven commitments to moderation and promoting responsible consumption.

The 'Priority Areas and Actions' are introduced without any analysis of why they have been put forward ahead of others and no evidence is provided indicating why they will succeed or the cost-benefits associated with each. For example, how will "health warning labels on packaging" change the drinking culture? The effectiveness of this proposed strategy and how this impost on industry can be justified in regards to changing behaviours is unclear. The same can be said about the reference to 'appropriate controls on pricing'. Given the target is to reduce at-risk consumption there is no link provided between this reference and the desired outcome.

The release of the discussion paper without prior evaluation of the effectiveness of the most recent NAS, together with limited consultation with the alcohol industry, has made for a poor start. The discussion papers signals the development of a fundamentally flawed strategy given the absence of any reference to promoting moderation and the steps the community has already made in this direction. WFA believes that alcohol should be taken out of the NDS process and will continue to advocate on this matter. In the meantime, the development of the draft NAS requires significant amendment and we look forward to that being undertaken.

We would also recommend that the Intergovernmental Committee on Drugs take on board the comments made by Dr Creina Stockley from the Australian Wine Research Institute in their separate submission on the NAS (Attachment .3.). Dr Stockley provides detailed analysis of the evidence used in the formulation of the NAS discussion paper (as she did separately for the NDS) and makes a series of more detailed recommendations to guide the development of the eventual NAS.

We trust that the concerns expressed in this submission and in that of Dr Stockley's submission will be reflected in the draft NAS and indeed in the final document. WFA looks forward to the next round of consultations with industry upon the release of the draft NAS

and indeed regard this next step as critical for ensuring a more balanced strategy is developed.

Yours sincerely,



Paul Evans
Chief Executive

Attachments:

1. WFA's submission on the draft National Drug Strategy.
2. WFA's letter to Minister Nash, copied to all State Health Ministers.
3. Submission by Dr Creina Stockley, Health & Regulatory Information Manager at The Australian Wine Research Institute.