



**Australian Grape & Wine  
Submission on the Draft  
National Preventive Health  
Strategy**

**April 2021**



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## Who are we

Australian Grape and Wine Incorporated (Australian Grape & Wine) is Australia's national association of winegrape and wine producers. Our activities focus upon the objective of providing leadership, strategy, advocacy and support that serves Australian wine businesses now and into the future.

We represent the interests of the more than 2,500 winemakers and 6,000 winegrape growers working in Australia. Our role is to help forge a political, social and regulatory environment - in Australia and overseas - that enables profitable and sustainable Australian wine and winegrape growing businesses. These businesses make a significant contribution to underpinning regional economies by driving growth in jobs, regional exports and food and wine tourism.

Australian Grape & Wine's voluntary membership represents over 75% of the national winegrape crush. We represent small, medium and large winemakers and winegrape growers from across the country. Policy decisions by the Australian Grape & Wine Board require 80% support, ensuring no single category can dominate the decision-making process and guaranteeing policy is only determined if it provides significant industry benefit. In practice, most decisions are determined by consensus.

Australian Grape & Wine is recognised as a representative organisation for winegrape and wine producers under the *Wine Australia Act 2013* and is incorporated under the *SA Associations Incorporation Act 1985*. We work in partnership with the Australian Government to develop and implement policy that is in the best interests of winegrape growers and winemakers across Australia.

## Executive Summary

Australian Grape & Wine welcomes the opportunity to make a submission on the *Draft National Preventive Health Strategy – Valuing health before illness: Living well for longer 2021 -2030*.

Australian Grape & Wine supports the vision “to improve the health of all Australians at all stages of life, through early intervention, better information, targeting risk factors and addressing the broader causes of poor health and wellbeing.” However, we have some differing views from those outlined in the Draft Strategy, on areas to focus on, that will be outlined in this submission.

Firstly, it was pleasing that the principle of multi-sector collaboration is recognised in the Draft Strategy, and that the commercial sector can play a pivotal role in positively shaping the health outcomes of Australians. Australian Grape & Wine is committed to collaborating with governments, the public health sector, consumers and others in the community to continue the positive gains Australia has seen in recent years with regard to more moderate drinking behaviour across the community as a whole, and critically, in target demographic groups such as, people under the age of eighteen and pregnant women. These gains demonstrate that targeted messaging is working and drinking in moderation is becoming the new norm in Australia, as illustrated in the latest report from the [Australian Institute of Health and Welfare](#), which found that the proportion of the population aged 14 years and over who consumed alcohol daily had declined significantly between 2016 (6.0%) and 2019 (5.4%).<sup>1</sup>

Later in this submission we outline some targeted campaigns implemented by DrinkWise, an independent, not-for-profit organisation funded by industry and government, working to instil a healthier and safer drinking culture in Australia. Targeted campaigns are vital to achieving meaningful behavioural change and Australian Grape & Wine will continue to support this approach as our members do not want to see their products misused. Australian Grape & Wine supports the industry, consumers and governments working together on targeted campaigns to drive a moderation culture.

Secondly, we also note the comment on page 36 of this Draft Strategy, that states “multi-sectoral action must be protected from undue influence by any form of vested commercial interest”. It is important to ensure that this does not preclude wine producers, and others across the alcohol sector, from providing their views into preventive health programs and policies. To exclude views and input to future strategies simply on the grounds that a producer has provided them, will be detrimental to long term preventive health outcomes. Grape growers and winemakers know their customers, their products, their businesses and their local communities better than anyone, and because of this, they can add a unique perspective on how industry and governments can work together to deliver meaningful, targeted results, in a commercially viable way.

Finally, it is important to understand that grape growers and winemakers play a critical role in the economies and employment profiles of communities across rural and regional Australia, with grape growing, winemaking and wine-related tourism, contributing \$45.5 billion to the Australian economy.<sup>2</sup> Our sector supports more than 160,000 people across Australia (full and part time), the majority of which are located in rural and regional Australia. It also acts as a magnet for regional

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<sup>1</sup> [Alcohol Drinking](#) The 2019 National Drug Strategy Household Survey, Figure ALCOHOL2: Alcohol drinking status, people aged 14 and over, 2001 to 2019

<sup>2</sup> [Wine Australia](#), Economic Contribution of the Australian Wine Sector 2019, Pg. 5

tourism, with 8.3 million people visiting wineries in the year to March 2019.<sup>3</sup> So the suggestion raised in the strategy (and emanating from the 2010 Assessing Cost-effectiveness in Prevention Study), to introduce tax increases on tobacco (30% increase), alcohol (30% increase), and unhealthy foods (10% increase) to save \$6 billion in health care costs<sup>4</sup>, is overly simplistic and doesn't take into account the significant economic flow-on impacts this type of blanket measure would have, particularly in many regional communities across Australia, where grape and wine producers are employed and live. To be clear, a tax increase of this magnitude would lead to widespread business closures and job losses across Australia's 65 wine regions.

As the national association representing grape and wine businesses across Australia, we have reviewed the draft National Preventive Health Strategy and responded to the areas which are most relevant to our members. As such, outlined below are comments focused on the sections of, "Partnerships and community engagement" and "Reducing alcohol and other drug harm".

We provide this submission for your consideration and would be happy to provide further detail or explanation, as required.

## Partnerships and Community Engagement – 2030 Policy achievement targets

***Innovative partnerships are established between and within sectors that influence health, to ensure shared decision-making and to drive evidence-based change.***

***Public health policies, strategies and multi-sectorial action for prevention are protected from real, perceived or potential conflicts of interest through a national evidence-based approach and transparent stakeholder engagement processes.***

Australian Grape & Wine believes that multi-sectorial stakeholder engagement and an evidence-based approach can deliver benefits to public health policies and strategies with any perceived or real conflicting positions, being transparently shared with all parties involved. We have first-hand experience through our innovative partnerships with organisations such as [DrinkWise](#), which aims to bring about a healthier and safer drinking culture in Australia, and the Responsible Alcohol Advertising Code scheme ([ABAC](#)), the centerpiece of alcohol marketing regulation in Australia.

### DrinkWise

DrinkWise is an independent not-for-profit organisation established in 2005 and founded by alcohol industry leaders and community partnerships. It's governing board of eight community and six industry members, delivers unique benefits and insights by bringing together representatives from the preventive health sector, community and industry. The organisation is funded through voluntary industry contributions from the alcohol sector and has previously also received funding from both Coalition and Labor governments.

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<sup>3</sup> [Wine Australia](#), Economic Contribution of the Australian Wine Sector 2019, Pg. 4

<sup>4</sup> National Preventive Health Strategy 2021-2030, Pg. 21

DrinkWise aims to:

- Promote a generational change in the way Australians consume alcohol; and
- Increase the age that young Australians are introduced to alcohol, as evidence has shown that alcohol can impact the development of the adolescent brain.

To create generational changes, the organisation develops and implements a range of national awareness and education campaigns and also provides practical resources to help inform and support the community about alcohol use.

DrinkWise is an evidence-based organisation, that relies on independent research and clinical advice, including consultations with experts in public health, neuroscience, epidemiology, and child and adolescent psychology. DrinkWise and its programs, exemplify the Framework for Action<sup>5</sup>, as outlined in the Draft Preventive Health Strategy (Page 29). DrinkWise *mobilises a prevention system* to achieving sustainable prevention and long-term improvements in the focus areas of moderating alcohol consumption; It *boosts action in focus areas* such as, people under 18 years, women who are pregnant or thinking about becoming pregnant and indigenous communities; and, it provides *continuing strong foundations* acknowledging the preventive health action already being undertaken across Australia and recognises the importance of this action not only continuing but being enhanced.

Two DrinkWise programs that Australian Grape & Wine has worked closely with DrinkWise on are, the [DrinkWise Australia FASD Program](#) and the [Cellar Door Moderation program](#).

The Fetal Alcohol Spectrum Disorder (FASD) program creates awareness that it is safest for their baby if women who are planning a pregnancy, or are pregnant or breast feeding, do not drink alcohol. Partnering with mother and Olympic champion, Sally Pearson and medical expert Associate Professor Luke Burchill, the FASD program included a series of education videos, supported by a comprehensive media and PR strategy, messaging on female and male-centric news sites and a FASD-focused episode on Jam Pakt radio, as well as FASD-themed education programs delivered by Wanta Aboriginal Corporation in school and community settings in the Northern Territory. Actors, Deborah Mailman and Aaron Pedersen feature in the educational advertisements. Deb reflects on her choice not to drink during pregnancy and why she made that decision and Aaron talks about the importance of ensuring partners, family members and friends support women to abstain from alcohol, to have a healthy pregnancy and a healthy baby. The consumer reach of this program was measured at 5.95million, in 2020.

The wine industry and Cellar Door Moderation program, saw over 1,800 moderation education packs distributed to Australian cellar doors and key tourism associations in late 2019/early 2020. To date, 237,000 consumer consumption tracking cards have been distributed across Australia and work is currently underway to create more resources for in-person and virtual wine festivals in 2021.

## ABAC

Another innovative initiative developed by representative bodies in the Australian alcohol sector is the Responsible Alcohol Advertising Code scheme (ABAC). Australian Grape & Wine was one of the founders of ABAC which is also funded by the Brewers Association of Australia, Spirits & Cocktails Australia and users of the ABAC advertising pre-vetting service. It is a not-for-profit scheme established to promote responsible advertising and marketing of alcohol beverages via agreed

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<sup>5</sup> Draft National Preventive Health Strategy 2021-2030, Page 29

standards of good practice, regulation, education and advice to alcohol producers. The ABAC Scheme is:

- administered by a Management Committee which, along with government, includes representatives from industry and advertising;
- quasi-regulatory in nature, given the Australian Government is represented on the Management Committee and a Professor of Public Health, nominated by government, is part of all adjudication panel hearings.

The [ABAC Responsible Alcohol Marketing Code](#) outlines the key standards for the responsible content and placement of alcohol marketing in Australia. Subject to regular reviews, the ABAC Code reflects community expectations and changes in the media and advertising industries. It applies beyond traditional forms of advertising (television, radio, print and outdoor) to alcohol marketing communications in emerging digital and social media.

## Reducing alcohol and other drug harm – 2030 Policy achievement targets

### ***Target – 10% reduction in harmful alcohol consumption by Australians by 2025***

We note the National Preventive Health strategy suggests a target of a 10% reduction in harmful alcohol consumption by 2025. Whether by accident or design, this differs from the [National Alcohol strategy 2019-2028](#) target, which set a target of a 10% reduction in harmful alcohol consumption over the life of the Strategy (i.e., by 2028). Essentially, the time to achieve the targeted 10% reduction in harmful alcohol consumption, has been reduced by three years from one strategy to the next, without any consultation with relevant stakeholders, such as alcohol producers. It is important that the entire community is engaged in driving cultural change, including the wine sector. With this in mind, we call for the National Preventive Health Strategy to reflect the timelines set in the National Alcohol Strategy 2019-2028, to ensure consistency in the timelines that businesses, governments and other stakeholders are working to, and to avoid confusion for those with an interest in reducing alcohol-related harms in Australia.

### ***The availability and promotion of alcohol is restricted to minimise alcohol-related harm, particularly young people, including promotion of the NHMRC alcohol guidelines.***

As mentioned earlier in this submission, Australian Grape & Wine supports the ABAC Scheme, Australia's regulatory system for alcohol advertising and marketing.

The four key standards of the ABAC outline the requirements of Australian alcohol advertising and marketing in terms of: promoting moderate consumption; not appealing to minors; responsibly depicting the effects of alcohol; and not showing the consumption of an alcohol beverage before or during any activity that, for safety reasons, requires a high degree of alertness or physical coordination. These standards were designed to help ensure alcohol marketing and promotion is directed at adults and does not appear in media or formats which appeal to young people.

The ABAC Scheme is already operating effectively, and complaints are being addressed promptly. Australian Grape & Wine notes that the ABAC scheme provides strong protection around the promotion of alcohol to young people and would welcome government support for additional community expectations research. Australian Grape & Wine believes the current liquor licensing requirements for venues and retailers are the best mechanism for managing availability of alcohol.

### ***Restrict exposure to alcohol marketing for children, including through digital media***

The [ABAC Responsible Alcohol Marketing Code](#) sets out the key standards for the responsible content and placement of alcohol marketing in Australia. A core element of the Code are the placement rules which include a requirement to implement available age restriction controls for alcohol marketing. The following resources are included to assist alcohol marketers meet this requirement:

- “How to” guides on implementing age restrictions for alcohol marketing via [Facebook](#), [Instagram](#), [Snapchat](#) and [YouTube](#) developed by the International Alliance for Responsible Drinking and World Federation of Advertisers.
- A guide that explains how to age-restrict individual posts on Facebook (useful for alcohol promotion on third party accounts, i.e., social media influencers) is available here, <https://www.facebook.com/help/352402648173466>
- The [Best Practice for Responsible Digital Marketing of Alcohol](#) has been developed to assist alcohol marketers and their agencies in the management of their digital marketing.

The ABAC standards and tools are reviewed frequently in line with community expectations. ABACs pre-vetting service provides an assessment on whether a prospective alcohol advertisement meets ABAC’s requirements before the advert is released publicly. Together, these tools and services are applied to help restrict exposure to alcohol marketing for children, including through digital media.

### ***Evidence-based and credible mass media campaigns are a part of broader strategies to prevent harm***

Australian Grape & Wine strongly agrees that evidence-based mass-media campaigns are required to help prevent harm.

DrinkWise, has undertaken research on the status of Australia’s drinking culture and the impact of its many awareness campaigns. One of the most comprehensive pieces of research is DrinkWise’s [Australian Drinking Habits: 2007 vs 2017](#), undertaken to clarify how Australian drinking culture has changed over that decade, what influenced these changes, and what this means for health prevention efforts to reduce harm from excessive consumption. This research built on the findings from DrinkWise’s 2007 study, [Drinking Patterns in Australia 2001-2007](#), undertaken by independent market research firm GalKal to explore Australian drinking habits.

The results of this research revealed that for the most part, Australians have a positive relationship with alcohol and drink moderately to relax and enjoy a meal with family and friends. This research also shows that Australians are drinking less, and the rate of underage drinking is decreasing. These trends mirror recent government findings from the [Australian Institute of Health and Welfare](#), which suggest that our relationship with alcohol is fundamentally changing to one that is more mature and responsible.



This evidence-based approach has and continues to inform DrinkWise’s mass-media campaigns and provides relevant benchmarks to measure success in its future campaigns.

***The age of onset of alcohol and other drug use, is delayed to reduce harm among young people and across their later years***

The Australian alcohol industry understands the importance of delaying the commencement of alcohol consumption until people are over the age of 18. DrinkWise has developed a number of programs aimed specifically at delaying the commencement of alcohol consumption. For example, [DrinkWise’s Delay 5 Point Plan for parents](#), is a guide to help parents delay the introduction of alcohol to teens, it provides practical advice on how to be a positive influence and delay the child’s introduction to alcohol and is reinforced with a number of educational tools and advertising programs such as, “Kids Absorb your Drinking” aimed at parents, “Kids and Alcohol don’t mix” a campaign to delay introduction of alcohol to kids and “You got this” a campaign targeting school leavers. Australian Grape & Wine endorses these campaigns and supports the intent of delaying the introduction of alcohol to people under the age of 18. We will continue to support DrinkWise which has proven credentials in executing targeted public awareness campaigns.

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