



TasCOSS response to DHHS'  
Consultation Draft  
Tasmanian Alcohol Action Plan

June 2009

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The Tasmanian Council of Social Services (TasCOSS) welcomes the opportunity to comment on the Department of Health and Human Services' Consultation Draft of the Tasmanian Alcohol Action Plan (TAAP). A whole of government approach to addressing alcohol related harms and the impact it has on individuals and the community is an essential part of contributing to a healthier and safer Tasmania. TasCOSS supports the submission made by the Alcohol Tobacco and other Drugs Council (ATDC) and we would like to emphasise the following points made in their submission:

*Tasmanian specific data:* TasCOSS welcomes the collation of Tasmanian-specific data that accompanies the TAAP, since the lack of such data has impacted on the ability to maximise both targeted education strategies as well as treatment outcomes. As the ATDC point out in their submission, Tasmania is deficient in accurate and timely data about the effectiveness of the alcohol related support services it provides, largely because of a lack of time, skills and resources to enable those providing services to undertake follow-up and other data collection activities. 'On the ground' evidence gathered by Tasmanian alcohol and drug services remains an untapped source of information.

*High risk groups:* Pregnant women, Tasmanian Aborigines, young people, poly-drug users and prisoners, are identified in the Plan as 'High risk groups' and make up one of the four priority areas in the Plan. Although the focus on high risk groups is essential, it is important to focus on the individuals and communities not identified as 'high risk' and ensure that the lack of prioritisation of other groups (for example homeless people, people with mental health issues, acquired brain injury or age pensioners) does not pose any additional barriers to accessing appropriate services. The effects and impact of alcohol related harm can be felt throughout the entire community and it would be unwise to focus solely on the specific risk factors with the high risk groups identified in the plan.

*Transport issues:* We strongly support the ATDC's claim that a consideration of broader public transport issues should be included in the plan. Barriers to accessing public transport should be considered as a key part of addressing the reduction of alcohol related accidents and deaths. Accessible public transport must be a viable alternative to vehicle use for people under the influence of alcohol.

*Licensing issues:* We support the ATDC's view that more work needs to be done to make Licensing Commission hearings more transparent and for local councils to be more involved in planning processes around licensed premises. A review of the membership of the Licensing Board should consider the inclusion of a public health and/or Tasmania Police representative. The licensing process needs to take into account issues such as outlet density, public safety and community interest. According to the ATDC, penalties around licensing breaches need to be

publicised more effectively and there is confusion amongst stakeholders as to the criteria that influence decisions with regard to granting (or refusing) a license.

*Taxation levers:* As discussed in the ATDCs submission, evidence shows raising alcohol taxes leads to reductions in a range of alcohol related harm. Increases in alcohol taxation leads to decreases in drink driving, fatal and non-fatal youth car crashes, homicides and other crimes, including rape, robbery, assaults, motor vehicle thefts, domestic violence and child abuse. TasCOSS supports the ATDC's belief that the State should utilise all measures available to it to instigate or support any push for volumetric taxation for all alcoholic beverages.

*Alcohol advertising:* We support the ATDC's view that a revision of the body that regulates alcohol advertising is required, given the failure of the self-regulating Alcoholic Beverages Advertising Code (ABAC). According to the ATDC, the current standards do not work and the ABAC has failed to manage inappropriate advertising, calling into question the notion of self-regulation by industry. A new regulatory approach needs to be developed and that alcohol advertising should be restricted, reduced, or indeed phased out in a similar way that tobacco advertising has been.