

24 October 2022

Ms Megan Arnold
Acting Senior Director
Alcohol and Other Drug Policy Team
Population Health
ACT Health Directorate
Level 3, 4 Bowes St, Phillip ACT 2606

AODPolicy@act.gov.au

Dear Ms Arnold,

ACT DRUG STRATEGY ACTION PLAN 2022-2026 CONSULTATION

Thank you for the opportunity to provide feedback on the ACT Drug Strategy Action Plan 2022-2026. The Foundation for Alcohol Research and Education (FARE) welcomes the development of the Drug Strategy Action Plan, and we look forward to its implementation.

FARE is the leading not-for-profit organisation working towards an Australia free from alcohol harms. We approach this through developing evidence-informed policy, enabling people-powered advocacy and delivering health promotion programs. FARE has been working with communities across the country to improve the health and wellbeing of Australians for 20 years.

As we noted in our previous feedback in February on the Discussion Paper, there are many aspects of the plan that we support. These include the collaborative and whole-of-system approach; principles promoting access and equity; a social determinants approach; valuing the lived experience of people, families and carers; and taking a person-centred approach. We are also supportive of the focus on preventing domestic and family violence and on reducing involvement with the criminal justice system.

We are pleased to see the links with the ACT Wellbeing Framework, the National Preventive Health Strategy and the ACT Preventive Health Plan. As noted in our previous feedback, we recommend that further preventive health measures (targeting alcohol harm) are included in this Action Plan. This aligns with the ACT Preventive Health Plan which contains goals, (including fewer people using alcohol at risky levels), but not measures on how to achieve these goals.

There are three specific actions that we believe should be included in the Strategy, these are:

1. Explore options for regulating alcohol promotions, including ensuring that take away and online alcohol sales are incorporated into the updated Liquor Promotion Guidelines.
2. Improve access to diagnosis and screening of Fetal Alcohol Spectrum Disorder (FASD).
3. Include the action already drafted relating to online alcohol delivery.

1. Strengthening regulation of alcohol promotions

We recommend that an action be included under '*Changing systems and protecting people from harm*' to strengthen the '*Responsible Promotion of Liquor Guidelines*'. This should adequately address the sale of off-licence or take away alcohol and the promotion of the online delivery of alcohol including marketing on digital platforms. For example, the ACT Government could take steps to ensure that alcohol is not promoted to people in the ACT through online shopping sites for general groceries. We understand that the review of these Guidelines was underway in 2021,¹ and believe that strengthening these Guidelines is important to preventing and reducing alcohol harm.

2. Preventing Fetal Alcohol Spectrum Disorder (FASD)

We recommend that an action be included under *'Strengthening supports for people with co-occurring and complex needs'* to improve access to screening and diagnosis of FASD in the ACT, across the health, education, child protection and criminal justice sectors. While the Strategy refers to the *National Fetal Alcohol Spectrum Disorder Strategic Action Plan 2018-2028*, there are no actions relating to FASD.

FASD is a diagnostic term describing a range of neuro-developmental impairments. FASD is a lifelong disability, that describes impacts on the brain and body of individuals prenatally exposed to alcohol. People with FASD experience challenges in their daily living and need support with motor skills, physical health, learning, memory, attention, communication, emotional regulation, and social skills to reach their full potential. Each individual with FASD is unique and has areas of both strengths and challenges.^{2,3}

We welcome the Government's commitment in the ACT Budget of \$11.5 million over four years to fund a program of initiatives, in partnership with Aboriginal and Torres Strait Islander organisations, to reduce over representation of First Nations people in the ACT justice system. This commitment includes a new screening program to assess people at the Alexander Machonochie Centre for cognitive disability.⁴ It is important that actions are taken at the Territory-level to improve the prevention, diagnosis and treatment of FASD.

3. Review regulation of online sales and delivery

Another area for action is to review current regulations relating to the delivery of alcohol. We welcome the inclusion of an action to *"Review relevant legislation to ensure current arrangements are contributing to minimising harm from **online liquor sales and delivery** and explore options for further regulation"*. Online alcohol sales and home delivery have created a significant increase in alcohol availability in Australia. This disruption has meant existing liquor licensing laws are insufficient to regulate emerging health and safety risks of this type of alcohol supply.

It is urgent that all Australian jurisdictions act on this issue. The COVID-19 lockdowns meant isolation and stress are heightened, increasing risks of mental illness, self-harm and family violence. Alcohol exacerbates these issues, and there is clear Australian evidence that alcohol delivery is associated with risky levels of alcohol use in the home.^{5,6} FARE supports common sense measures to keep up with the rapidly changing online environment, which include:

- No rapid (less than two-hour) deliveries
- No late-night deliveries
- Effective online ID check age verification
- Ban predatory marketing
- Better training and protections for delivery staff
- Improved data collection

FARE also supports the Alcohol, Tobacco and Other Drug Association ACT (ATODA) submission on the Drug Strategy Action Plan, specifically we support their recommendations to:

- Review online liquor sales and delivery regulation, including reducing the risk of domestic and family violence (Action 15)
- Increase funding of AOD / ATOD services and increase workforce to meet significant investment gap and increased levels of episodes (Additional Actions)
- Review and amend the make-up of the Liquor Advisory Board. Currently only one of the ten members is selected on the basis of their expertise in health and the effects of alcohol (Additional Actions).

We look forward to working with the ACT Health Directorate, and with the ACT Justice and Community Safety (JACS) Directorate to contribute to this review of online liquor sales and delivery legislation and regulation.

For further information on any of this feedback, please contact Melanie Poole, FARE Policy and Research Director, on melanie.poole@fare.org.au.

Yours sincerely,



Caterina Giorgi
CEO
Foundation for Alcohol Research and Education

¹ ACT Government (2021) *Responsible Promotion of Liquor Guidelines Review* <https://www.accesscanberra.act.gov.au/s/article/liquor-licensing-and-permits-tab-liquor-promotion-guidelines-review>

² Bower C & Elliott EJ (2016) Australian Guide to the diagnosis of FASD. Updated 2020.

https://www.fasdhub.org.au/siteassets/pdfs/australian-guide-to-diagnosis-of-fasd_all-appendices.pdf

³ CanFASD (2018) What is FASD?, Canada FASD Research Network <https://www.nofasd.org.au/alcohol-and-pregnancy/what-is-fasd/>

⁴ ACT Government (2022) *Additional funding to reduce over representation of First Nations people in ACT justice system* https://www.cmtedd.act.gov.au/open_government/inform/act_government_media_releases/barr/2022/additional-funding-to-reduce-over-representation-of-first-nations-people-in-act-justice-system

⁵ FARE (2020) *Annual Alcohol Poll: Attitudes and Behaviours*. <http://fare.org.au/wp-content/uploads/ALCPOLL-2020.pdf>

⁶ VicHealth (2020) On-demand alcohol delivery services and risky drinking. <https://www.vichealth.vic.gov.au/media-and-resources/publications/alcohol-delivery-risky-drinking>