



Foundation for Alcohol Research & Education

Submission to the inquiry into age verification for online wagering and online pornography

October 2019



**STOPPING
HARM
CAUSED BY
ALCOHOL**

About the Foundation for Alcohol Research and Education

The Foundation for Alcohol Research and Education (FARE) is an independent, not-for-profit organisation working to stop the harm caused by alcohol.

Alcohol harm in Australia is significant. Nearly 6,000 lives are lost every year and more than 144,000 people are hospitalised making alcohol one of our nation's greatest preventive health challenges.

For more than a decade, FARE has been working with communities, governments, health professionals and police across the country to stop alcohol harm by supporting world-leading research, raising public awareness and advocating for changes to alcohol policy.

FARE is guided by the World Health Organization's (2010) *Global strategy to reduce the harmful use of alcohol* for stopping alcohol harm through population-based strategies, problem directed policies, and direct interventions.

If you would like to contribute to FARE's important work, call us on (02) 6122 8600 or email info@fare.org.au.

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Introduction

Alcohol is a legal drug that is restricted for purchase to people aged 18 and over in every state and territory in Australia. The National Health and Medical Research Council (NHMRC) Alcohol Guidelines warn that for anyone under 18 years of age not drinking alcohol is the safest option; drinking alcohol from a young age can damage the developing brain; and “the risks of accidents, injuries, violence and self-harm are high among drinkers aged under 18 years.”¹ Alcohol is an addictive psychoactive drug that diminishes responsible decision-making, leading to greater likelihood of risky behaviours, thereby magnifying the vulnerabilities of children. Alcohol is also implicated in the three leading causes of death for adolescents: assaults, accidents and suicide.²

Alcohol contributes to more than 200 disease and injury conditions and is a group one carcinogen.³ It is one of the leading contributors to death and disability across the country, responsible for almost 6000 deaths and 144,000 hospitalisations each year.⁴

The average age of first consumption of alcohol for Australians is 16.1,⁵ almost two years under the legal age. While there have been pleasing reductions in the number of young people consuming alcohol at lifetime risky levels, young people continue to consume alcohol primarily in high-risk occasions, colloquially known as “binge drinking”. The latest National Drug Strategy Household Survey (NDSHS) found that 14.6 per cent of 16-17-year-olds binge drink at least once a month,⁶ with 4.6 per cent of 16-17-year-olds classed as being at very high risk of alcohol-related harm.⁷ The Australian Secondary Students’ Alcohol and Drug (ASSAD) survey 2017 reports that 34 per cent of 12-17-year-olds and 61 per cent of 16-17-year-olds reported they had consumed alcohol in a binge drinking occasion at least once, with parties being the most common place to consume alcohol.⁸ Almost two thirds (64 per cent) of current drinkers aged 16-17 reported a negative outcome after drinking, from vomiting (44 per cent) and missing school/work (12 per cent) through to trying drugs (27 per cent) and being in trouble with the police (six per cent).⁹

Given the legal requirements to restrict alcohol sales, and the health and community safety implications from children drinking, it is expected that alcohol cannot be purchased by minors in Australia. While ID is often (though not always) checked in store while making physical purchases, the current attempts to age-gate online sales are completely inadequate and pose little challenge to the everyday 15-year-old. The increased opportunities for underage access presented by online sales and home delivery, especially as deliveries can be left unattended, pose a serious risk to underage drinkers and the wider community. As new innovations develop, such as 30-minute rapid delivery or the use of online marketplaces such as Airtasker, it’s essential that regulatory responses keep pace.¹⁰

Alcohol retailers have a legal responsibility to ensure that they do not sell alcohol to minors. However, in the absence of clear government guidelines as to the standards expected for online sales, this obligation has not been adequately discharged. We can see from other jurisdictions in the world that it is possible to restrict sales of products effectively and to require verification at point of purchase for online sales. Technological solutions exist and should be used. Alcohol retailers are granted a licence to sell a restricted substance and have a responsibility to ensure that they are doing so in such a way as to protect minors and uphold the law.

Alcohol, like wagering and pornography, is a commodity that the Australian community has decided should be restricted only to adults. Children do not expect to be able to walk into a bottle shop and purchase vodka without ID. Similarly, they should not expect to be able to purchase vodka online without having to prove their age. As the Morrison Government has stated, “We understand that Australians expect the laws and standards of behaviour that apply in the physical world should apply

equally in the online world.”¹¹ The opportunities offered by online services undermine the current enforcement mechanisms to prevent sales to minors and must be updated as a matter of priority.

Current status in Australia

Proof of age questions

Currently, it is illegal to sell alcohol to children (persons aged under 18) in every state and territory in Australia. However, there are no laws specifically directed at how age should be verified for online sales. As a result, a number of completely ineffectual age-gating methods are in use. Tick boxes that invite people to assert they are over 18 years of age, or to enter in a birthdate are not challenging for the average teenager to circumvent. Indeed, most primary school age children are able to get past these methods.

A 2019 audit of 504 licences and 215 websites in NSW found that an absence of effective age-gating exists:

- 62 per cent of websites were not following signage and/or verification conditions required by their liquor licence
- 60 per cent of websites did not require the purchaser to declare their DOB or declare they are 18 years or over.¹²

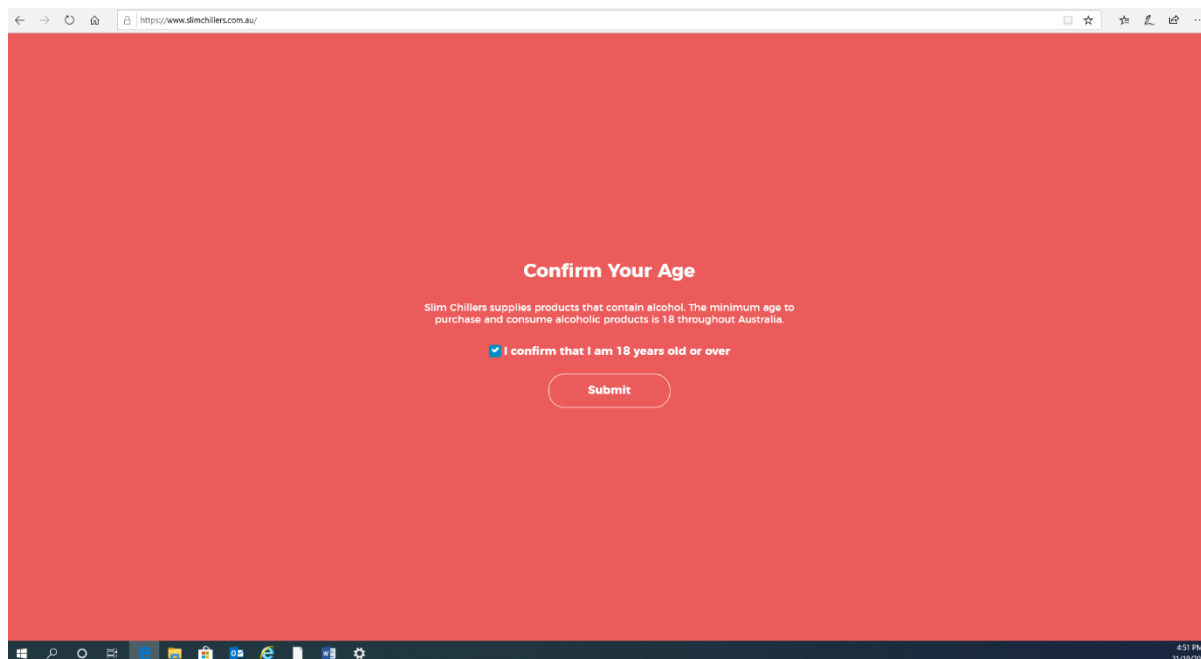
A 2019 research study of the ways people use online sales and home delivery services to purchase alcohol, found that more than one-third of respondents aged 25 years and under did not have their ID checked when receiving their last order. Overall, 12.1 per cent received their order in person and did not have their ID checked, while a further 24 per cent did not personally receive their delivery (the order was left unattended at home or they had the order accepted by someone else).¹³ A copy of the research report is attached as Appendix A to this submission.

Case Study: Skinny Freezers by Slim Chillers

On 7 September 2019, the Alcohol Beverages Advertising Code (ABAC) Adjudication Panel held that the alcoholic icy-pole product “skinny freezers” breached the responsible marketing code as their packaging had a “strong or evident appeal to minors”. Slim Chillers has so far refused to engage with the ABAC and the products are still available to purchase online.

The age-gating on the Slim Chillers website is grossly inadequate, with an initial pop-up appearing when you first move from the homepage to the store asking you to confirm that you are over 18. After that easily bypassed security feature, there are no further attempts at age-gating and once purchased, the products can be left unattended upon delivery.

Figure 1: Age-gating on the Slim Chillers webpage



Payment systems

Payment systems are sometimes proffered as a way of ensuring payment integrity. However, these have a number of bypass options for children, and children are easily able to use range of payment options, from debit cards, PayPal, gift cards and even “buy now, pay later” services such as Afterpay.

Credit/debit cards

While banks generally do not allow children to own a credit card, many minors have banks accounts linked to debit cards run by the key brands such as Visa. Online payment portals are generally unable to differentiate between, for example, a Visa debit and Visa credit card, meaning that minors can use Visa debits to purchase alcohol. A FARE staff member successfully used a Visa debit card to purchase alcohol from both Dan Murphy’s and BWS stores after having to enter a birthdate (which was not further verified).

Gift cards

Gift cards are another way that youth can purchase alcohol, for example, Woolworths’ “WISH” e-gift cards are redeemable at both Dan Murphy’s and BWS.¹⁴ As has been highlighted in Australian and international experience, gift cards are an easy way for minors to purchase items without parental consent or knowledge.¹⁵

PayPal

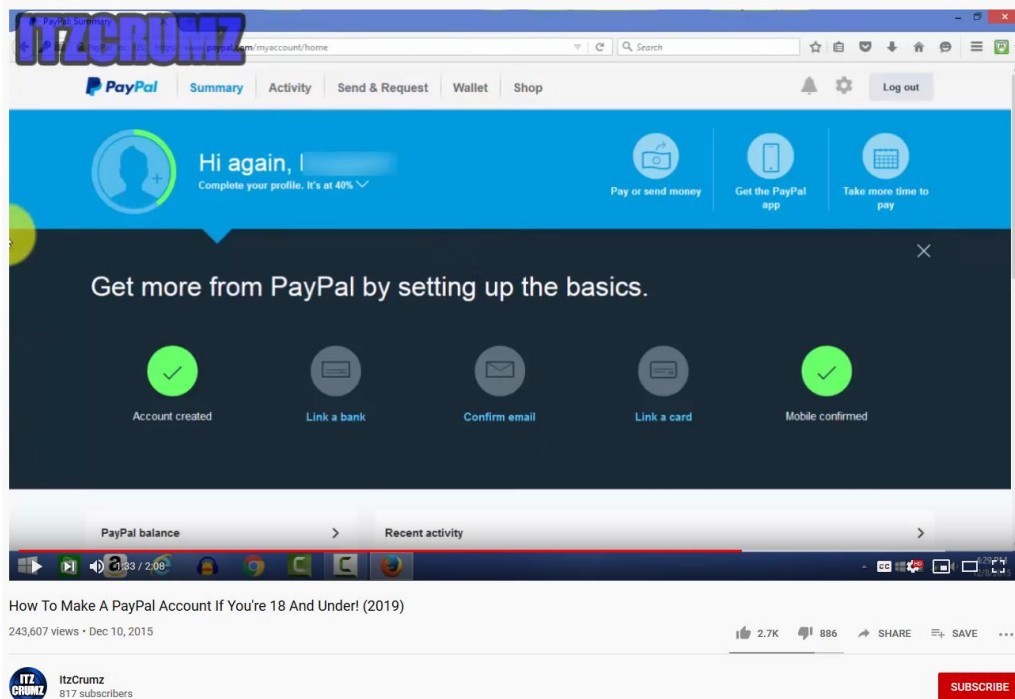
While PayPal again is theoretically reserved for those over 18, it has inadequate age-gating mechanisms. If you enter search terms such as “how to get a PayPal account under 18” a number of easy “how to” instructional videos appear, which walk you through how to sign up for PayPal as a

minor, and even how to sign up for PayPal without linking it to a debit/credit card, allowing you to use the service with direct transfers.

Figure 2: First result on Google search using terms “how to get a PayPal account under 18”¹⁶



Figure 3: Video snapshot showing the effective technique to set up a PayPal account not linked to a credit card



Buy now, pay later services

There have already been several recorded cases of children using ‘buy now, pay later’ services to obtain alcohol. For example, recently a child was able to purchase and receive seven bottles of champagne. The whole process of signing up and making the purchase reportedly took less than five minutes. The child had no means of making the repayments.¹⁷

In another instance Ownership Matters conducted a field report that “detailed how a 16-year-old child of a staff member set up an account to buy more than \$300 of alcohol without having to verify their age. More than \$250 was extended to a "Miguel Laucha", the Spanish name for "Mickey Mouse", using a prepaid anonymous mobile sim card and VISA card.”¹⁸

When FARE last surveyed the buy now pay later field in late 2018, it found three services, Afterpay, Oxipay and Zippay, that could be used to purchase alcohol online. These services include rapid delivery services such as Quick Bottle, which promises delivery within 40-60 minutes and whose age-gating consists of a disclaimer that “by entering this site you are certifying that you are over 18”.

Figure 4: Age-gating on Quick Bottle website



Age-gating at point of delivery

The current delivery process cannot be relied upon to prevent the delivery of alcohol to a minor if they have successfully purchased it online. While it is against the law for a delivery agent to knowingly supply alcohol to a minor, it is perfectly legal in most states and territories to leave an alcohol delivery unattended at the delivery address. This would be an obvious and easy delivery choice for an underage person who has purchased alcohol online.

FARE wishes to emphasise that even after a more robust system of age verification is applied online, this needs to be accompanied with age-verification upon delivery.

Australian solutions to age verification online

Other industries which use age verification

There are a number of industries that already use identity and/or age verification in Australia, including mobile phone providers, retailers and online wagering.

Signing up for a mobile phone number online, requires an ID check using official identification documentation such as driver's licences and passports.

Meanwhile, retailers have the option of restricting online alcohol sales to customers who have set up an account in person, having provided adequate identification. Banks and insurers are examples of services that may require physical attendance with 100 points of identification in order to set up an online service.

Finally, online wagering, which this committee is considering, currently requires age verification within 14 days of account set-up and before any money is released. This verification requires 100 points of identification. FARE strongly believes that 14 days is an unreasonably long timeframe that poses dangers to vulnerable children when technical solutions exist to implement age verification when an account is first established.

Existing technical solutions to point of purchase verification online

Solutions to age verification are already working in Australia. For example, the Digital ID system developed by Australia Post is a valid proof of age and identity card that can be used across all states in Australia. It is already accepted as proof of age for 18+ venues in VIC, TAS, ACT, QLD and NT, and for verification on a number of websites.

The government may also like to learn from the work done by the Digital Transformation Agency (DTA) on the Trusted Digital Identity Framework (TDIF) for government services. This is a set of rules and standards that accredited members of the digital identity federation must follow. It makes sure everyone has a safe, secure, consistent and reliable way to use government services online. It is important that legitimate privacy concerns are taken into account when setting standards for age verification.

International Examples

The increased ease with which online sales to minors is facilitated by online services is a challenge worldwide, but some countries have taken important steps to improve age-gating.

The United Kingdom

In the UK, the Licensing Act 2003 sets out the scheme for licensing premises in England and Wales that sell or supply alcohol, among other things. The Act sets out mandatory age verification requirements. Guidance issued under section 182 of the Licensing Act 2003, released in April 2018, indicates that age verification before delivery to the customer is required.¹⁹ It also states, "Age verification measures (for example, online age verification) should be used to ensure that alcohol is not sold to any person under the age of 18."²⁰

The BSI, the UK's National Standards Body, published a code of practice with support from the Digital Policy Alliance to provide guidance on effective age verification to protect children from age-restricted content while online. The guidance is GDPR compliant.

The press release states:

The guidance – PAS 1296: 2018 Online age checking – provision and use of online age checks services – code of practice – provides recommendations to prevent ineligible users from:

- a.) Buying age-restricted goods online*
- b.) Accessing age-restricted content online (e.g. adult content)*
- c.) Using age-restricted online services (e.g. dating agencies)*
- d.) Accessing harmful content on platforms and apps²¹*

The UK has also recently shelved plans to introduce an age verification scheme for pornography. While there were some legitimate concerns with aspects of the policy, and some oversights in regard to obligations to the EU which appear to have hindered the final progress of the scheme, it sets an illustrative example of the technical capabilities of service providers. Many UK businesses had invested substantial time and money in developing verification products.²²

The United States

In mid-2010 the PACT Act came into effect. It requires age verification for tobacco sold through a delivery sale, such as over the Internet or by telephone.²³

The PACT Act states:

“... the sale of illegal cigarettes and smokeless tobacco over the Internet, and through mail, fax, or phone orders, makes it cheaper and easier for children to obtain tobacco products” and specifies that a purpose of the Act is to “prevent and reduce youth access to inexpensive cigarettes and smokeless tobacco through illegal Internet or contraband sales.”²⁴

The PACT Act requires a seller to obtain the name, date of birth and address of a potential purchaser and verify the information through a third-party database before accepting a delivery sale.²⁵ It also requires that either the purchaser or another adult sign for delivery and that the deliverer sights a “valid, government-issued identification bearing a photograph” for that individual to ensure they are of age in the place of delivery.²⁶

With regard to alcohol, a University of North Carolina study found that 59 per cent of the internet alcohol vendors used age-verification strategies at the point of order that were ineffective at verifying the age of the purchaser.²⁷ Interestingly, the study identified that

“[o]rders from vendors that used weak or no age verification at the point of order were significantly more likely to be successful [in delivering the alcohol to the underage purchaser] than were those from vendors using more rigorous age verification.”²⁸

This suggests that even systems that are not entirely robust may deter many potential underage drinkers.

Denmark

Denmark has an Executive Order on the Provision of Online Betting.²⁹ This requires an online betting provider to obtain identity information from an individual registering with them. This includes their name, address and ID number. This information is required to be verified “no later than when the first payment is made”.³⁰ To login into a gaming account, following verification, “involves the use of a digital signature with a security level corresponding to the OCES standard or higher”.³¹ In practice, this

means using NemID. The provider is required to check that the NemID used matches the individual registered.³²

NemID is a single login used for various activities such as online banking.³³ Danes can obtain a NemID from a citizen service centre, from their bank or online with their passport or driving license.³⁴ It consists of three elements: a user ID, a password and a code card with one-time codes.³⁵

Netherlands

The Netherlands provides an example of third-party age verification being undertaken when alcohol is purchased in store. In available locations, the age verification technology is part of the till.³⁶ When an alcohol product is scanned, the purchaser's age must be verified for the purchase to proceed. This occurs via a remote verification centre. An operator determines via video connection whether the purchaser is unquestionably over the age of 25. If it is unclear, the purchaser is required to produce their ID for verification. The remote operator approves the purchase or blocks the sale from occurring.^{37,38} "This objectified method of age validation has evidenced to make it virtually impossible for minors to buy alcohol."³⁹

FARE's recommendations

Alcohol retailers have a responsibility to ensure that they are taking adequate steps to prevent minors from purchasing alcohol. Just as ID is requested at point of purchase in a physical shop, ID should also be requested at point of purchase in an online shop. Indeed, considering the ease of online sales, and the reduced risks of being caught attempting to purchase alcohol while underage, it is more important that online sales have a robust system of age verification.

FARE makes the following recommendations for an effective age-gating system. However, we acknowledge that there are a number of different technical approaches to this issue, and should the committee decide that a different system is more robust, then FARE would support this as long as it was effective in stopping underage purchases of alcohol.

1. The Government should mandate adequate age-gating at point of purchase

Minimum standards should be set in regard to the information required, accuracy of verification, privacy and effectiveness.

While FARE does not recommend any particular age verification system, FARE strongly recommends that the committee look to technical solutions such as Australia Post's DigitalID and similar services in Australia and overseas, including those outlined above. Should none of the online verification methods be found to be effective, the option to only allow online sales for purchasers who have created an account in person should be explored.

2. ID is checked on delivery

Because no system is perfect, especially not for intelligent, digitally-literate teenagers with strong motivation and access to "hacks" on the internet, age verification at point of purchase should be accompanied by age verification at point of delivery.

3. Further checks are carried out after the first sale to verify the information given

As an additional safeguard, the business could send a letter addressed to the purported owner of the account after the purchase has been made confirming the details and the sale. This may reduce the incentive to borrow someone else's ID for the purposes of forging a digital ID.

4. Monitoring and compliance

Following the introduction of an age verification standard, it should be monitored and evaluated in order to assess the effectiveness and identify shortcomings. This should include controlled purchase operations in which the systems are tested to see whether a child could obtain alcohol. Adequate penalties for non-compliance must also be implemented.

Conclusion

An effective age-gating system for alcohol and other age-restricted products will benefit consumers and retailers alike. Underage consumers will find it difficult to obtain age-restricted products, and businesses will have peace of mind that they are complying with their legal requirements of only selling products to those legally allowed to purchase them.

FARE's recommendations set out the necessary parameters for an effective age-gating system in Australia. In practice, the age-gating system could take a number of forms. As the WHO Europe recently observed:

"It is not the responsibility of public health experts to find technological solutions prior to implementation of regulations. Once the rules are in place, industry and other relevant stakeholders will find solutions, just as they have in similar circumstances in the past."⁴⁰

Alcohol, gambling products and pornography should not be sold to those under 18. The endpoint is clear. FARE wishes the committee every success in finding the best path to that endpoint.

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Appendix A.

ALCOHOL HOME DELIVERY SERVICES: AN INVESTIGATION OF USE AND RISK

October 2019

EMBARGOED UNTIL 6 NOVEMBER 2019

**STOPPING
HARM**
CAUSED BY
ALCOHOL

Foundation for Alcohol Research & Education

FOUNDATION FOR ALCOHOL RESEARCH & EDUCATION

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