



Mr Scott Gregson
General Manager
Adjudication Branch
Australian Competition & Consumer Commission
470 Northbourne Avenue
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Dickson ACT 2602

FILE No:
DOC:
MARS/PRISM:

Monday, 2 July 2007

Your Ref: A91054 and A910555

Dear Mr Gregson,

Applications for authorisation A91054 and A91055 lodged by the Distilled Spirits Industry Council of Australia Inc and others – interested party consultation

On behalf of the Board and staff of the Youth Substance Abuse Service, I would like to thank you for your letter of 14th June 2007 to me and providing me, as an interested party, with the opportunity to comment on the issues outlined in this letter and in the application received from the Applicants.

Background information - the Youth Substance Abuse Service

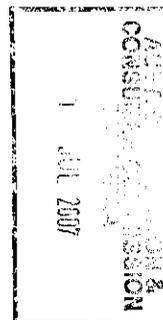
The Youth Substance Abuse Service (YSAS) is a statewide organisation aiming to respond to young people between the ages of 12 and 21 who are experiencing problems related to the use of drugs and/or alcohol. YSAS is the largest youth specific drug and alcohol treatment services in Victoria and provides an integrated suite of youth specific outreach, case management, treatment, support and rehabilitation, and training programs.

The 'typical' young person accessing the services provided by YSAS has experienced multiple adverse events in his or her life, apart from and preceding those associated with their alcohol and/or drug use. The majority of these young people have experienced significant levels of trauma and abuse during their childhood and adolescence. Issues that may need to be addressed by our service include legal problems, homelessness and sexual assault.

Young People and Alcohol

Research data indicates that risky alcohol consumption by young people may lead to significant acute and chronic harm. There is mounting evidence that drinking may be more harmful for the developing brain than previously thought, as well associated harms that include rapes, sexual and physical assaults, motor vehicle crashes and other accidents.

Young people are starting to drink alcohol at earlier ages, consuming larger quantities and binge drinking at a high rate. The most recent AIHW data notes that 25% of those aged 14-19 years drank alcohol on a daily or weekly basis



in the last 12 months compared to 50% of all persons 14 years and over, much of it at risky or high levels.

Policy responses favoured by the Youth Substance Abuse Service

YSAS believes that a harm minimisation response to problematic alcohol use by young people should be multifaceted and evidence-based. Research indicates that the following four simple and effective measures are highly effective approaches in reducing alcohol-related harm to the individual young person and the wider community:

- increasing the cost of alcohol
When the cost of alcohol is increased, there is a reduction in consumption rates. Alcohol price and/or tax increases impact on young drinkers more than older drinkers, and are also associated with a reduction in the rates of motor vehicle deaths and injuries and incidents of violence.
- reducing the availability of alcohol
Limiting the number of alcohol retailers and reducing their hours of operation serves to reduce the ability of young people to access alcohol. This policy approach also has a positive effect in reducing the levels and patterns of youth alcohol consumption and the rates of alcohol-related incidents and accidents.
- stronger regulation of alcohol advertising and promotions
Studies indicate that alcohol marketing is often attractive to children. Given the considerable evidence that industry self-regulation appears to be largely ineffective, the time has come for ABAC to be replaced by an independent or government regulator to be appointed. Promotions such as 'happy hours' and discounted drinks promotions appear to be targeted towards young people and encourage binge drinking and the rapid consumption of alcohol in a short period of time rather than a 'paced approach' to alcohol consumption. Banning these practices would have a positive effect in reducing the levels and patterns of youth alcohol consumption.
- stronger enforcement of legislation in relation to the sale and consumption of alcohol
Given the cost to community of alcohol-related accidents and incidents and the disproportionate number of young people involved in them, YSAS proposes that a stricter enforcement of laws in relation to the sale of alcohol to minors and intoxicated persons would have a positive effect on the rates of alcohol-related incidents and accidents involving young people in the short term.

A response to the issues outlined in this letter and in the application received from the Applicants

It will be apparent from the above that any lessening of competition between retailers and wholesalers that benefits the wider community by minimising unsafe drinking behaviours and underage drinking is supported by YSAS.

While YSAS supports the role of the Retailer Alert System (RAS), it is unclear why the charter of the Alcohol Advertising Pre-vetting System (AAPS) could not be broadened to address the matters, rather than establish a new body. The AAPS with its revised charter could then pre-vet product types (the role of the RAS) as well as undertaking its current tasks of pre-vetting advertisements and names.

YSAS is not in favour of removing the power of governments to ban products which are undesirable.

YSAS wishes to be informed of the progress of these applications at the draft and final determination stages.

Yours sincerely

A handwritten signature in black ink, appearing to read "Glenn Bowes". The signature is fluid and cursive, with the first name "Glenn" and last name "Bowes" clearly distinguishable.

Professor Glenn Bowes

Chair
Youth Substance Abuse Service