



**BREWERS**  
ASSOCIATION

## **Submission**

# **ACT Drug Strategy Action Plan 2018-21**

3 August 2018

# Table of Contents

- Introduction..... 3
- About the Brewers Association ..... 4
- Alcohol consumption in Australia ..... 5
  - Youth consumption trends..... 5
- Responses to priority actions ..... 7
  - Build community knowledge and change acceptability of use ..... 7
    - DrinkWise ..... 8
  - Restrictions on promotion..... 9
    - Sports sponsorship ..... 10
    - The Alcohol Beverages Advertising Code: effective industry regulation ..... 11
- Price mechanisms ..... 13
- Supporting research and building and sharing evidence..... 13
- Safe transport and sobering up services..... 13
- Screening, assessment and treatment..... 14
- Age restrictions ..... 14
- Contact ..... 15



## Introduction

The Brewers Association of Australia recognises that the harmful use of alcohol is a societal issue that the ACT Government is committed to addressing through the *ACT Drug Strategy Action Plan 2018-2021*.

Efforts to address alcohol misuse must be backed by sound, evidence-based responses and policy solutions.

The Brewers Association is committed to playing a proactive role in mitigating the effects of harmful drinking through partnerships with government, community and academia. This submission outlines our response to the priority initiatives identified under the Action Plan.

We are also pleased to note that significant gains have been made in improving Australia's drinking culture, including reductions in underage drinking, an increase in the age of initiation, and reductions in harmful drinking patterns among young adults and the broader population.

While there is further work to be done in ensuring that harm mitigation efforts are targeting vulnerable groups, we urge the ACT Government to consider its policies in light of significantly reduced consumption figures across Australia – including record low rates of teenage drinking, declining levels of harmful consumption and consumption per capita continuing a 50-year trend of marked improvement.

Any reforms must target the harmful consumption of alcohol, while not adversely affecting the overwhelming majority of the population who consume responsibly and sociably.

We caution the ACT Government against the idea that restricting advertising or sports sponsorship will be a silver bullet for change.

- Firstly, we submit that alcohol advertising and/or sports sponsorship do not target, nor do they influence, young people in their attitudes to drinking and drinking behaviour
- Secondly, that the actual drivers of alcohol misuse and anti-social behaviour are complex.

Misunderstanding the role advertising and sports sponsorship play in terms of community attitudes to alcohol risks masking the real drivers of harmful alcohol consumption and perpetuating the problem through misdiagnosis, while only serving to penalise the majority of ACT citizens who do consume alcohol responsibly.



## About the Brewers Association

The Brewers Association of Australia is the peak industry body representing Australia's premier beer makers.

The Association and its members – Carlton & United Breweries, Lion Beer Australia and Coopers Brewery – have a longstanding commitment across a range of activities to promote responsible consumption of alcohol and minimise harm associated with alcohol misuse.

The beer industry makes a significant investment in cultural change and education initiatives across the Australian community through DrinkWise Australia.

DrinkWise is a not-for-profit organisation, supported by industry, which is achieving success in delivering a healthier and safer drinking culture through its well-recognised national information and education campaigns. DrinkWise also provides practical resources to help inform and support the community about alcohol use.

With 95 per cent of all beer sold in Australia being made in Australia, the brewing sector underpins more than 105,000 full-time equivalent Australian jobs and generates \$16.9 billion a year in economic activity – accounting for 1.02 per cent of national GDP. The industry makes a substantial contribution to the economy through the manufacturing, hospitality, retail tourism and agricultural sectors.

In NSW/ACT, beer drives \$4.3 billion a year in Gross State Product and supports some 31,000 full-time equivalent jobs.

Agriculture is a major contributor to the success of the beer industry, producing one million tons of barley per year across Australia for beer production, as well as 600 tonnes of hops from Australian farmers.

Australians pay among the highest excise on beer in the world, in addition to a 10 per cent GST. In 2016-17, taxes on beer drinkers netted the Australian Government \$4.2 billion – \$2.4 billion in excise and \$1.8 billion in GST.

The most expensive ingredient in Australian beer is tax, with tax accounting for one-third of the price of a typical carton of full strength beer. Australian tax rates on beer are also indexed twice every year.



# Alcohol consumption in Australia

The Action Plan’s objectives with respect to alcohol consumption are to:

1. Reduce the proportion of the ACT population drinking at single-occasion risky levels
2. Reduce the proportion of the ACT population drinking at lifetime risky levels.

It is worth exploring the national trends in lower alcohol consumption that have already been achieved. The historical perception of Australians as heavy drinkers is simply not supported by current data. Consumption peaked at 12.9 litres of pure alcohol per person in the mid-1970s; by contrast, the ABS shows that consumption today has fallen 25 per cent to 9.7 litres.<sup>1</sup>

The World Health Organisation reports that against culturally similar countries, Australia is at the low end of the spectrum when it comes to binge drinking; ranked 31 out of 37 for instances of heavy episodic drinking.<sup>2</sup>

Furthermore, according to the Australian Institute of Health and Welfare (AIHW) National Drug Strategy Household Survey (NDSHS) just 6% of Australians drink daily – down from 9% in 2007.<sup>3</sup>

Overall consumption has fallen, and among Australians who are drinking, we’re seeing a greater shift towards lower alcohol products. The Australian beer sector has invested significantly in low- and mid-strength options to cater to increased consumer demand for greater choice in moderate consumption options, and these categories now account for one-quarter (24 per cent) of all beer sold in Australia.<sup>4</sup>

## Youth consumption trends

The Action Plan makes specific reference to ‘Delay the age of uptake of alcohol by young people.’ It is, therefore, informative to examine the latest findings of the AIHW NDSHS to demonstrate the dramatic modern, long-term decline in youth alcohol consumption in Australia:

	2004	2007	2010	2013	2016
Abstinence rates among 12-17 year olds	54.3%	56.5%	63.6%	72.3%	82%
Average age of first drink	14.7	14.9	15.2	15.7	16.1
Proportion of 12-17 year olds drinking at lifetime risky drinking patterns	6.4%	5.4%	4.2%	2.6%	1.3%
Proportion of 12-17 year olds at risk of drinking harm on a single occasion	17.2%	16.6%	14.1%	8.7%	5.4%

Source: Australian Institute of Health and Welfare, National Drug Strategy Household Survey, 2017.

The drop in youth consumption trends is stark and speaks to the great strides forward on the part of governments, the health industry and DrinkWise to effectively communicate the potential harms of alcohol to younger Australians.

<sup>1</sup> Australian Bureau of Statistics, Apparent Consumption of Alcohol, 2016-17.

<sup>2</sup> WHO, Global Status Report on Alcohol and Health 2014.

<sup>3</sup> Australian Institute of Health and Welfare, National Drug Strategy Household Survey, 2017.

<sup>4</sup> Australian Bureau of Statistics, Apparent Consumption of Alcohol, 2016-17.



It is also worth noting that declining consumption has occurred over a period where alcohol advertising expenditure has only increased – there is a lack of correlation between societal consumption trends and alcohol advertising, which the next section will examine in further detail.



## Responses to priority actions

The Brewers Association agrees with many of the initiatives outlined in the Action Plan; we have outlined our position below.

### Build community knowledge and change acceptability of use

*Action 1. Conduct evidence-informed alcohol public education and social marketing campaigns, including those that aim to:*

- *Increase public knowledge of links between alcohol use and chronic disease, including cancer and cardiovascular disease*
- *Increase public knowledge of safe drinking guidelines*
- *Increase the knowledge of young people, including school students, of the short and long-term harms of risky drinking, and also of issues relating to secondary supply of alcohol to peers*

**The Brewers Association supports this action in principle;** we have also acknowledged that excessive drinking can damage a person's health however responsible drinking can be part of a balanced lifestyle. Evidence on the links between moderate alcohol consumption and cancer or cardiovascular disease is not proven.

We encourage the ACT Government to focus on education and awareness programs to address those at risk of alcohol misuse. The Brewers Association would be pleased to work with the government and provide some insights in relation to developing effective campaigns given our particular expertise in understanding consumers.

Effective campaigns and policy approaches ensure that individuals or groups at risk of harm are directly targeted through a range of policy interventions supported by public education campaigns.

Firstly, we suggest that any new education campaign around alcohol should make use of existing evidence and research around alcohol consumption. The ACT Government may wish to work with independent organisations, grass-roots community organisations and industry education efforts to leverage existing skill and expertise. The Brewers Association would be happy to contribute to this process.

Secondly, and especially important given the experience of declining harmful alcohol consumption, campaigns should be designed with a clear and specific target in mind, with effective research and comprehensive measurement and review.

Thirdly, gaps in existing knowledge about the characteristics, behaviour and motivations of populations at risk of alcohol misuse should be filled with further research.

Alcohol education can be provided through a range of tools and channels depending on the message, the target audience and the likely effectiveness of different approaches. This can range from mass media, such as television and digital, to more targeted channels such as community forums or information provision through local healthcare professionals and clinics.

We also support efforts to educate and inform young people about the harms associated with risky drinking. Parental and other social influencers have the most influence over underage attitudes to drinking and drinking behaviour.<sup>5</sup>

---

<sup>5</sup> Donovan, J.E. 2004. Adolescent alcohol initiation: a review of psychosocial risk factors. *Journal of Adolescent Health*, 35(6):529. e7-18.



The Brewers Association encourages the ACT Government to consider adding a parental engagement component to alcohol education programs in schools, to actively involve and inform parents. Such a program could run in conjunction with school-based alcohol education programs, providing parents with the skills to communicate effectively with their children on responsible drinking.

The ACT Government may also consider targeted campaigns to parents to inform them on the role they play when it comes to alcohol and their children. We support all efforts to reduce secondary supply of alcohol to young people by adults and peers.

### DrinkWise

The Brewers Association encourages the ACT Government to seek the input of DrinkWise in developing targeted education campaigns. Australia, industry-led initiatives have achieved significant success in changing attitudes around harmful consumption of alcohol. Australia's major brewers are founding members and the major funders of DrinkWise, a not-for-profit organisation dedicated to changing Australia's drinking culture.

DrinkWise was established in 2005, with Federal Government and industry funds, to harness the power of evidenced-based social marketing to bring about a healthier and safer drinking culture in Australia. DrinkWise applies a whole-of-community approach involving industry, government, health and education professionals and the broader community.

DrinkWise is focused on promoting evidenced based information and practical solutions that encourage moderation and responsible consumption. It does this through targeted campaigns, education initiatives and resources that inform and support the community.

These campaigns have seen significant success over recent years, which is reflected in improving safe consumption trends. Most notably, the 'kids absorb your drinking' campaign has had an impact on the views of parents with respect to alcohol.

DrinkWise recently concluded a 10-year review of its programming and activities since 2007. Among its findings, the research found:<sup>6</sup>

- In 2017, 63% of drinkers usually consume no more than two standard drinks, as compared to 48% in 2007
- In 2017 just 16% of drinkers usually consume five or more standard drinks in a session, down from 24% in 2007
- In 2017 20% of Australians choose to abstain from alcohol all together, up from 11% in 2007
- Just 6% of Australians drink daily, down from 9% in 2007
- 37% of Australians drink weekly, down from 47% in 2007
- 87% of Australians believe pregnant women should not drink alcohol
- 80% of Australians believe kids under 18 should not drink alcohol
- Fewer Australian parents believe it is acceptable for their children to drink alcohol as long as they have supplied it (37% compared to 47% in 2007).

These figures reinforce the important strides that industry, government and the health sector have made in addressing harmful alcohol consumption in Australia, especially among under 18s.

The research reflects the fact that a holistic approach involving all community stakeholders is most effective at achieving cultural change and reduce the significant individual and

---

<sup>6</sup> DrinkWise/GALKAL, A Snapshot: Australian Drinking Habits 2007 vs 2017, 2017.



community harms associated with alcohol misuse. The Brewers Association and its members will continue to support DrinkWise and its work.

### Restrictions on promotion

*Action 2. Explore options to reduce alcohol promotion and use in ACT sports and other community settings.*

*Action 3. Consider options to reduce promotion of alcohol on government premises, consistent with preventive health commitments.*

### **The Brewers Association does not support these actions.**

In the 1970s, beer was 75 per cent of alcohol consumed in Australia – today not only has the total volume of alcohol consumed per capita declined, but beer’s share of that market has fallen to 39.9 per cent.<sup>7</sup>

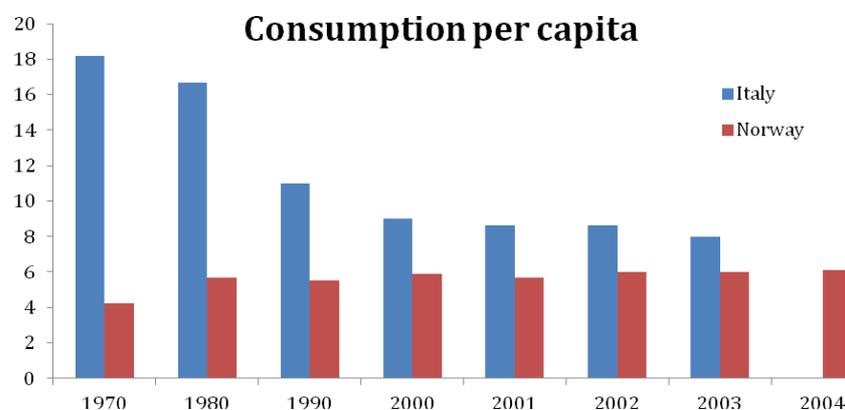
The beer industry recognises that some people misuse the product, which is why we place so much value on marketing beer responsibly. Individually and collectively through the Brewers Association, Australia’s biggest beer companies – CUB, Lion and Coopers – commit to the strict rules that govern alcohol advertising.

Effective regulation of advertising strikes a balance between adult consumers’ right to information, societal concern, and the ability of companies to advertise their products.

Furthermore, evidence shows bans have only a negligible, if any, effect on alcohol abuse and youth consumption. It is, however, evident that societal factors, such as parent, sibling and peer attitudes, are key drivers in young people’s attitudes to alcohol.

The evidence of 17 OECD countries where long-standing bans on alcohol advertising have been in place shows that bans did not result in a reduction in the number of new drinkers, in alcohol consumption overall, or in rates of alcohol misuse. Economic and deep-seated cultural factors are more important determinants of national drinking patterns.<sup>8</sup>

For example, Norway prohibits advertising but consumption continues to increase in that nation’s population. Significant advertising restrictions in Iceland, Sweden, Russia and Switzerland have not reduced harm. This is in contrast to Italy, where alcohol advertising is permitted, yet per capita consumption is decreasing.



Source: OECD, Alcohol consumption (litres per population aged 15+)

<sup>7</sup> Australian Bureau of Statistics, Apparent Consumption of Alcohol, 2015-16.

<sup>8</sup> Nelson, JP & Young, DJ. 'Do advertising bans work? An international comparison' *International Journal of Advertising*, 20(3), 2001, 273-296.



### **Case Study: New Zealand**

In New Zealand, statistics have demonstrated no correlation between inflation-adjusted alcohol advertising expenditure and consumption levels.

Over the past 27 years, both NZ advertising expenditure and consumption have varied widely but independently of each other. For example, 1998 was the year of the highest marketing spend and also the lowest consumption. Over the period between 1987 to 2013, per capita consumption for New Zealanders aged 15+ has reduced by 9.8%.

Per capita consumption in New Zealand began a long period of decline from February 1992 while at the same time the previous de-facto ban on radio and television advertising was removed. Given that TV and radio continue to enjoy the broadest reach of any media, despite the media fragmentation that began in the mid-2000s, the example of New Zealand's experience underlines the lack of any consistent relationship between levels of advertising and consumption levels.

*Source: Foundation for Advertising Research, March 19, 2014 – Alert 7/14.*

### **Case Study: France**

The Loi Evin bans alcohol advertisements on television and in cinemas, as well as sponsorship of sports and cultural events. There is strict control over content of messages and images, and mandatory inclusion in all advertisements of a message that alcohol abuse is dangerous to one's health.

French alcohol consumption per capita decreased from 18.46 litres in 1981 to 14.88 litres in 1991. Since Loi Evin was enacted in 1991 consumption has levelled off to 13.24 litres per capita. And despite Loi Evin the French consume more litres of alcohol per capita than in the UK (11.54).

Among young people, risky drinking, including heavy episodic drinking and repeat drunkenness, has increased considerably.

The Government's official Evaluation Report in 1999 stated that:

- Loi Evin has been 'ineffective' in reducing high-risk drinking patterns
- A comparison of the respective evolution in consumption and ad spend in several countries leads to the conclusion that a link between the two 'cannot be demonstrated'
- This absence of a link is also found by studies for several other countries including the Netherlands, Sweden, the UK, Germany, the US and Canada

Even the French anti-alcohol NGO ANPAA accepts that the effects of the law are 'weak'. Nonetheless they advocate regulation along the lines of the Loi Evin on symbolic grounds.

*Source: Berger, G. et al. 'La Loi relative à la lutte contre le tabagisme et l'alcoolisme: rapport d'évaluation', La Documentation Française, 1999; ESPAD, 'Substance abuse amongst students in 36 European Countries', 2012.*

### **Sports sponsorship**

Often the emotional hook used to advance misinformation is the claim that sports sponsorship by alcohol companies must be banned because it targets youth and, therefore, correlates with underage drinking. However, the reality is quite different from the hype.

In reality, the vast majority of people watching TV at all times are 18+ and the audience continues to age:



		0-17		18-24		25-39		40-54		55+	
		2004	2015	2004	2015	2004	2015	2004	2015	2004	2015
<b>19:30 - 20:30</b>	TOTAL TV	20%	15%	8%	5%	25%	22%	23%	25%	25%	34%
<b>20:30 - 21:30</b>	TOTAL TV	15%	12%	8%	6%	26%	23%	25%	27%	27%	32%
<b>06:00 - 23:59</b>	TOTAL TV	16%	11%	7%	4%	23%	20%	23%	25%	30%	41%

Source: OzTAM (television audience measurement) Data 2004-2015.

Again, according to OzTAM data covering 5 January 2014 to 28 March 2015, across all timeslots for the NRL season, viewership on Channel 9 averaged 90% aged 18+ and the viewers of the AFL season on Channel 7 averaged 89% aged 18+.

Over 2017 and 2018, viewers 18+ years of age across all live free-to-air timeslots made up the following audience for each code.

- Australian Open Tennis (2017) 93%
- Cricket – All Forms (2016-17) 90%
- NRL State of Origin Series 89%
- NRL Season 89%
- AFL Season 87%
- Super Rugby 92%
- Australian Open Tennis (2018) 93%
- Cricket – All Forms (2017-18) 90%

Source: OzTAM (television audience measurement) Data 2017 and 2018.

Claims that sports sponsorship targets youth are demonstrably incorrect.

The clear strategy of sports sponsorship is supporting sports across all levels, from amateur leagues to professional codes, and to influence brand choice over competitor products in the drinking repertoire of the predominantly adult audience.

Sports sponsorship, like advertising, is about product differentiation among the adult drinking population.

### The Alcohol Beverages Advertising Code: effective industry regulation

Industry has been instrumental in ensuring that a robust advertising code exists to portray responsible drinking and limit children's exposure to alcohol. Australia has a co-regulatory system for alcohol marketing: marketing guidelines have been negotiated with government and consumer complaints are handled independently, with all costs are borne by industry.

The Alcohol Beverages Advertising Code (ABAC) provides for strict regulation of alcohol advertising, marketing and social media. This robust independent system includes government representation, and complements and adds to the Australian Association of National Advertisers' system by providing specific and significant restrictions on the content of alcohol advertising, including:<sup>9</sup>

- Only portraying responsible and moderate use of alcohol beverages
- Responsibility towards minors (under the age of 18) including that advertisements must not have strong or evident appeal to minors or use actors that may appear to be underage (actors are required to be 25 years or older)

<sup>9</sup> Alcohol Beverages Advertising Code. Visit: [www.abac.org.au](http://www.abac.org.au) for more information



- Responsible depiction of the effects of alcohol by not portraying alcohol as a means to sexual or social success, or change in mood
- Not depicting the use of alcohol where it may reduce safety

As of 1 November 2017, the ABAC Scheme has been further strengthened to respond to community expectations around placement of advertisements, in addition to the existing restrictions on content as outlined above. The new ABAC provisions include:<sup>10</sup>

- Mandatory age gating – where age restriction controls are available, these must be used to exclude minors
- If age restriction controls are not available, adults are expected to comprise at least 75% of the audience
- Advertisements cannot be placed within programs or content primarily aimed at minors, even if the placement technically complies with the relevant industry code
- No electronic mail advertising can be sent to minors
- Better alignment between existing media codes, for example if the Commercial Television Industry Code of Practice, or the Outdoor Media Association Alcohol Guidelines, are breached, this will also now be a breach of ABAC

Regular evaluation of ABAC decisions is undertaken with the community to ensure that the code is meeting community expectations. The most recent round of community research was undertaken in March 2017 by Colmar Brunton Social Research.

An online survey of 1,225 Australians across locations, ages and genders measured community perceptions on 12 advertisements reviewed by Complaints Panel, seven of which were deemed by the Panel to breach the Code and were removed from circulation as a consequence.

One of these advertisements was deemed inappropriate by the community on an unprompted basis, i.e. before respondents had reviewed the Code; on a prompted basis a further four advertisements were considered inappropriate based on respondents' reading of the Code.<sup>11</sup>

#### **Case Study: VB Blues promotional 2016 State of Origin can**

The ABAC Panel forced a recall of the VB Blues promotional can as part of the 2016 NRL State of Origin series, on the basis that the can's NSW Blues jersey design may have appealed to some children.

However, the blue can packaging on an unprompted basis was deemed acceptable by 67% of viewers, with just 22% deeming it unacceptable. Even after The Code was reviewed by viewers, 62% remained committed to the blue can promotion being acceptable.

*Source: ABAC Responsible Alcohol Marketing Code Scheme, Review of Decisions, Colmar Brunton Social Research, March 2017.*

The Colmar Brunton research indicates that ABAC's current system of alcohol advertising regulation is robust, and if anything, conservative when compared to community expectations. It also demonstrates that ABAC has teeth. There is 100 per cent industry compliance with ABAC rulings.

Alcohol advertising meets community expectations. The Advertising Standards Bureau reports that alcohol advertising in 2017 made up just 1.5% of all advertising complaints, with just 0.6% of those actually requiring ASB determination.

<sup>10</sup> Alcohol Beverages Advertising Code. Visit: [www.abac.org.au](http://www.abac.org.au) for more information

<sup>11</sup> Alcohol Beverages Advertising Code. Visit: [www.abac.org.au](http://www.abac.org.au) for more information



## Price mechanisms

*Action 4. Explore the option of introducing a minimum price per standard drink of alcohol.*

We note that the Northern Territory Government is instituting minimum unit pricing on 1 October this year; **we submit that the ACT Government should consider this action item after a full and independent evaluation of the NT minimum unit price experience.**

We also note that at this time a number of jurisdictions internationally have instituted a minimum unit price, including Scotland, and we would encourage the ACT to review this evidence before proceeding.

## Supporting research and building and sharing evidence

*Action 5. Undertake research to inform public health responses on contextual and individual factors that influence risky drinking and alcohol-related harms, including:*

- *Links between alcohol use and domestic and family violence*
- *The impact of enforcement measures on risky drinking*
- *Evidence-informed options for further reducing road safety risk caused by drink-driving*
- *Exposure of young people and risky drinkers to alcohol advertising in ACT public spaces*

**The Brewers Association is supportive of undertaking further research into contextual and individual factors that influence risky drinking in the ACT**, and we note the work of DrinkWise and AIHW data in evaluating changing attitudes towards alcohol consumption.

Specifically on violence, the Brewers Association believes that anti-social and violent behaviour is never acceptable, irrespective of how, when or why it occurs. The role of alcohol in violence is complex and there is ample credible scientific data that shows there is not a direct causal relationship between alcohol consumption and violence.

However, the Brewers Association does acknowledge that violent individuals may be heavy drinkers and users of other drugs, and that violence and alcohol is a concern for the ACT Government, the community and the alcohol industry.

The Brewers Association supports the implementation of measures that are aimed at reducing violence. In considering policy options to reduce instances of violence, the Brewers Association recommends governments consider a range of targeted options, including the development of a best-practice guide for appropriate policing and monitoring of late night entertainment precincts, consequence policing and effective targeting of known offenders, secondary school education programs and cultural change campaigns.

As a result of this, targeted interventions are more likely to be evidence based, and as such, more likely to have effective outcomes.

## Safe transport and sobering up services

*Action 6. Continue work to reduce alcohol impaired driving, including random breath testing and the ACT alcohol interlock program, taking into consideration findings from evaluations of relevant programs.*

**The Brewers Association supports this action item.**

## Screening, assessment and treatment

*Action 7. Implement appropriate actions at territory level to support the national Foetal Alcohol Spectrum Disorder (FASD) Strategic Action Plan (when finalised).*

**Brewers Association members are unanimous in their desire to play a proactive role in helping to inform and drive actions under the FASD Strategy 2018-28.**

In 2012, Australia's major beer producers – CUB, Lion and Coopers – voluntarily adopted pregnancy warning labels on products and did so quickly, with 90% covered by July 2013. This means that the leaders in the beer industry were well ahead of the original timetable of 80% coverage by the end of 2013.

Since 2014, all products made by Brewers Association members bear this important and well recognised logo.

Through DrinkWise, our members are committed to funding campaigns highlighting FASD risks and educating at-risk communities that it is safest not to drink when pregnant. DrinkWise is presently producing content that promotes moderation messages throughout Indigenous communities, focusing on FASD and parental role modelling.

We note that significantly fewer pregnant women in Australia are drinking and those who do are drinking less. However, it is clear more needs to be done.

According to the Australian Institute of Health and Welfare's *National Drug Strategy Household Survey 2013*, the rates of abstinence among pregnant women have increased from 40% in 2007 to 55.8% in 2016.

The AIHW Survey also found that women (aged 14-49) who did consume alcohol during pregnancy are doing so at low levels, with 97.3% consuming 1-2 standard drinks over the course of their pregnancy. The AIHW found that the percentage of women consuming at higher rates was too small to record with accuracy.

The Brewers Association is keenly aware of the long-term commitment required to make further inroads into the incidences of FASD, and that to be effective, evidence-based targeted interventions will require a combination of resources and effort from government, industry and the community.

We are committed to working to achieve a reduction in the incidence of FASD.

## Age restrictions

*Action 8. Explore measures to reduce secondary supply of alcohol to minors, including by family members and over-age friends.*

**We support all efforts to reduce secondary supply of alcohol to young people by adults and peers.**



## Contact

The Brewers Association looks forward to continuing to work with the ACT Government throughout the development of the *ACT Drug Strategy Action Plan 2018-21* and beyond.

For more information, or to follow up on any aspect of our submission, please do not hesitate to contact me.

Kind regards,



Brett Heffernan  
CEO  
Brewers Association of Australia & New Zealand  
P: 02 6295 7199  
M: 0467 650 020  
E: [brett.heffernan@brewers.org.au](mailto:brett.heffernan@brewers.org.au)

