



**Australian
Distillers
Association**

November 2024

**House of Representatives Standing Committee on
Health, Aged Care and Sport:**

Inquiry into the health impacts of alcohol and other drug use in Australia

INTRODUCTION

The Australian spirits industry welcomes the opportunity to contribute to the House Standing Committee on Health, Aged Care and Sport inquiry into the health impacts of alcohol and other drugs in Australia.

This submission is lodged on behalf of Members of Spirits & Cocktails Australia and the Australian Distillers Association. Together, we represent spirits producers involved in the manufacture, marketing and sale of spirits throughout Australia.

Our supply chain showcases the best of Australian industries, from farming and native ingredients harvesting, through to tourism and world class hospitality. Our industry contributes \$15.5 billion in added value to the Australian economy, supporting 5,700 spirits manufacturing jobs and a further 45,400 jobs in spirits wholesale, retail and hospitality. An additional 48,700 indirect jobs are supported throughout our supply chain.

Spirits & Cocktails Australia and Australian Distillers Association share a commitment to promoting a safe and vibrant spirits sector, which reflects Australia's mature drinking culture and creates opportunities for economic development, through the sustainable development of a distinctly Australian manufacturing industry. But this can only be achieved with the right policy settings.

EXECUTIVE SUMMARY

More than three quarters of Australians consume alcohol as part of a balanced lifestyle (77%), with the vast majority (70%) doing so responsibly and in accordance with the National Health and Medical Research Council guidelines.¹

In Australia, we have laws to regulate the production of alcohol, and we also regulate when and how people purchase and consume alcohol, and how it is advertised and marketed. While these laws and regulations are designed to protect consumers, they are also there to promote responsible consumption.

All of these protections recognise that the community has certain expectations and conditions on the consumption of alcohol, as we do with many industries and products.

More Australians are drinking responsibly, and in moderation

The Australian Institute of Health and Welfare's (AIHW) [National Drug Strategy Household Survey](#) has found significant improvements in Australia's drinking habits over the last decade.

Australians are making informed choices about their alcohol consumption, with AIHW data confirming significant declines in risky and heavy episodic drinking. Australia's per capita alcohol consumption continues its downward trajectory – a trend established over the last 50 years. These positive shifts highlight that heavy regulations and restrictions are not necessarily the solution to affecting positive long-term behavioural changes.

Evidence also suggests that “moderate alcohol consumption may provide some health benefits”² and improved mental health through social interaction and connectedness.³

The Australian spirits industry reflects the changes underway in attitudes and behaviours toward alcohol. This is evidenced in the growth of visits to distillery doors and in cocktail culture – both of which provide opportunities to enjoy alcohol in moderation, in lower tempo and experiential settings.

The Australian spirits industry makes an important contribution to the economy and social fabric of Australia. However, we also recognise that more can be done to deliver targeted support for vulnerable people and at-risk populations. We therefore make the following recommendations for consideration through this important Inquiry.

¹ Australian Institute of Health and Welfare, 2024, "Alcohol", <https://www.aihw.gov.au/reportsdata/behaviours-risk-factors/alcohol/overview>

² Eric Rimm, 'Moderation key to alcohol's potential health benefits', January 2023, *Harvard T.H. Chan School of Public Health*, <<https://www.hsph.harvard.edu/news/hsph-in-the-news/moderation-key-to-alcohols-potential-health-benefits/>>

³ Harvard T.H. Chan School of Public Health, 'Alcohol: Balancing Risks and Benefits', April 2022, <<https://nutritionsource.hsph.harvard.edu/healthy-drinks/drinks-to-consume-in-moderation/alcohol-full-story/>>

Summary of Recommendations:

1. Implement Priority Three of the National Alcohol Strategy:

- a. Increase screening, assessment, referral, and treatment in primary health care settings and coordination between primary care, acute, and specialist services.
- b. Expand the range of intervention options from brief and early interventions through to withdrawal management, psycho-social interventions, residential rehabilitation, community care, and aftercare programs.
- c. Implement settings-based approaches to identifying, screening, assessment, brief interventions, and referral to minimise alcohol-related problems (e.g. sexual health services; needle syringe programs; maternity, mental and community health and justice health services).
- d. Ensure that specific services for people with severe alcohol and other drug problems are available.
- e. Enhance the capacity of generalist health care, community, welfare, and support services.
- f. Implement tailored interventions across a range of health care settings, including more
- g. investment in detoxification and rehabilitation services for individuals who cannot be treated in the community.
- h. Improve availability of effective psychosocial treatment (e.g. counselling, cognitive behaviour therapies) and social approaches including employment and housing programs.

2. Adopt QR technology to enhance consumer information and reduce the administrative and cost burden on spirits manufacturers to make regulatory changes to product labels.

1. Australians are drinking less, but better

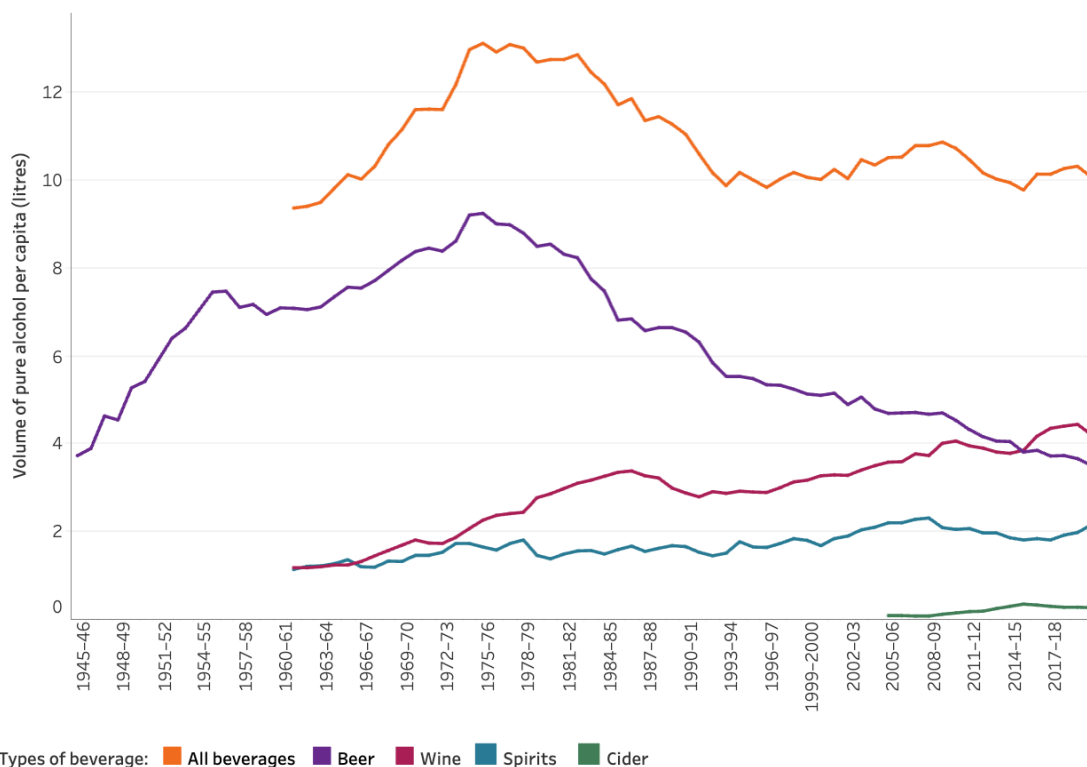
Alcohol consumption trends across Australia are changing, as consumers choose to drink less but more premium products. This is driving the trend of ‘premiumisation’, with consumer demand for unique and innovative products that celebrate provenance, legacy and craft growing steadily over the last decade.

According to the National Drug Strategy Household Survey:

“Alcohol has a unique place in Australian society. While the number of people abstaining from alcohol has gradually increased over time, a majority of people in Australia do consume alcohol, and of those that do, most drink at safe levels.”⁴

The perception that dangerous and excessive drinking is increasing does not reflect the reality that per capita alcohol consumption has been declining for the last 50 years.⁵

Graph: Apparent consumption of alcohol by beverage type, 1944–45 to 2019–20 (AIHW, 2024)



⁴ Australian Institute of Health and Welfare, ‘National Drug Strategy Household Survey: Alcohol Consumption’, 29 February 2024, <<https://www.aihw.gov.au/reports/illegal-use-of-drugs/national-drug-strategy-household-survey/contents/alcohol-consumption>>

⁵ The AIHW defines ‘per capita consumption’ as the Australian population aged 15 and over.

1.1 Risky and heavy episodic drinking are in decline

The 2022–2023 National Drug Strategy Household Survey (NDSHS) continued a trend of gradually declining risky drinking in Australia since 2004, when 39 per cent of the population consumed alcohol at risky levels.⁶

Similar trends occurred among people drinking more than 10 standard drinks per week on average (25 per cent in 2022–2023, compared with 32 per cent in 2004) and more than four standard drinks in a single day at least once a month (24 per cent in 2022–2023, compared with 30 per cent in 2004). The rates of risky alcohol consumption have continued to decrease at a faster rate since 2010.

AIHW data also confirms that risky drinking has declined across all but one age cohort (60-69 age group). The AIHW derives this analysis from 2020 National Health and Medical Research Centre guideline 1 – i.e. a person consuming more than 10 standard drinks per week, or more than 4 standard drinks on a single day at least once per month, on average.

Table: 'Risky drinking' percentages by age group (AIHW, 2024)

Age Group	2001	2022-23	Change
14-17	30.7	5.5	82.1% reduction
18-24	58.5	41.8	28.5% reduction
25-29	47.6	34.0	28.6% reduction
30-39	37.8	32.0	15.3% reduction
40-49	36.0	33.0	8.3% reduction
50-59	34.9	32.3	7.4% reduction
60-69	28.0	33.2	18.6% increase
70+	29.2	24.9	14.7% reduction
All over 14	38.1	30.7	19.4% reduction

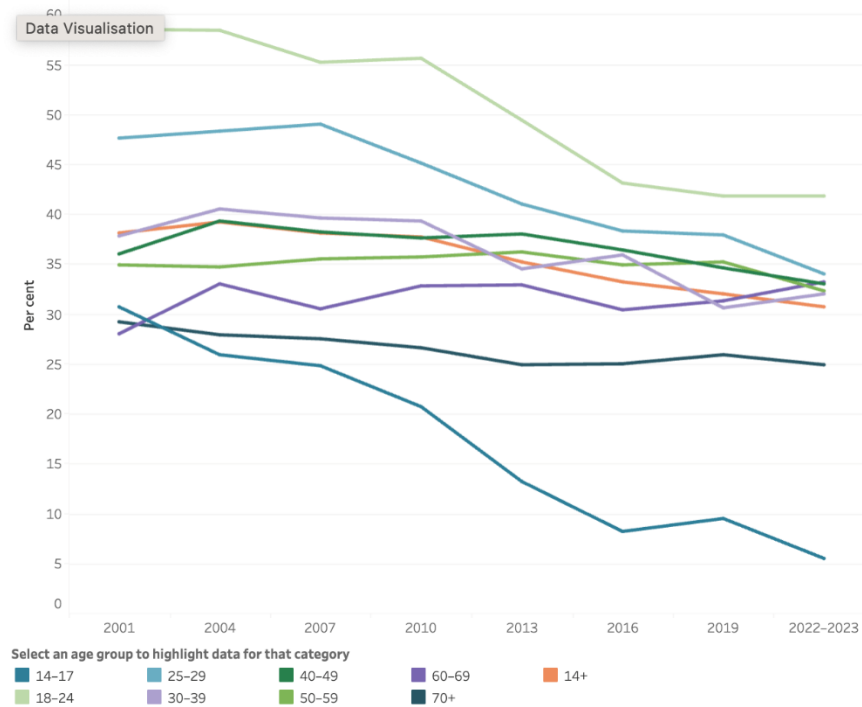
According to an AIHW 2023 report, the proportion of people who took part in at least one risky activity under the influence of alcohol reduced from 17.4 per cent in 2016 to 14.7 per cent in 2022–2023, continuing the downward trend occurring since 2010 when 22 per cent of people had done so. Similar reductions occurred in individual risky activities, including driving a motor vehicle.⁷

⁶ Australian Institute of Health and Welfare, 'National Drug Strategy Household Survey: Risky Alcohol Consumption in the NDSHS', 29 February 2024, <<https://www.aihw.gov.au/reports/alcohol/risky-alcohol-consumption>>

⁷ Australian Institute of Health and Welfare, 'National Drug Strategy Household Survey: Alcohol-related harms and risks in the NDSHS', 29 February 2024, <<https://www.aihw.gov.au/reports/alcohol/alcohol-related-harms-and-risks#Fewer-people>>

Over the same period, measures of heavy episodic drinking (HED) also declined by 13 per cent between 2010 and 2016. Likewise, the rate of age-standardised alcohol attributable deaths has declined by 13 per cent in the period 2003 to 2018, and the rate of age-standardised alcohol attributable total burden (Disability-adjusted life year - DALY) has fallen by 10 per cent.

Graph: 'Risky drinking' percentages by age group (AIHW, 2024)

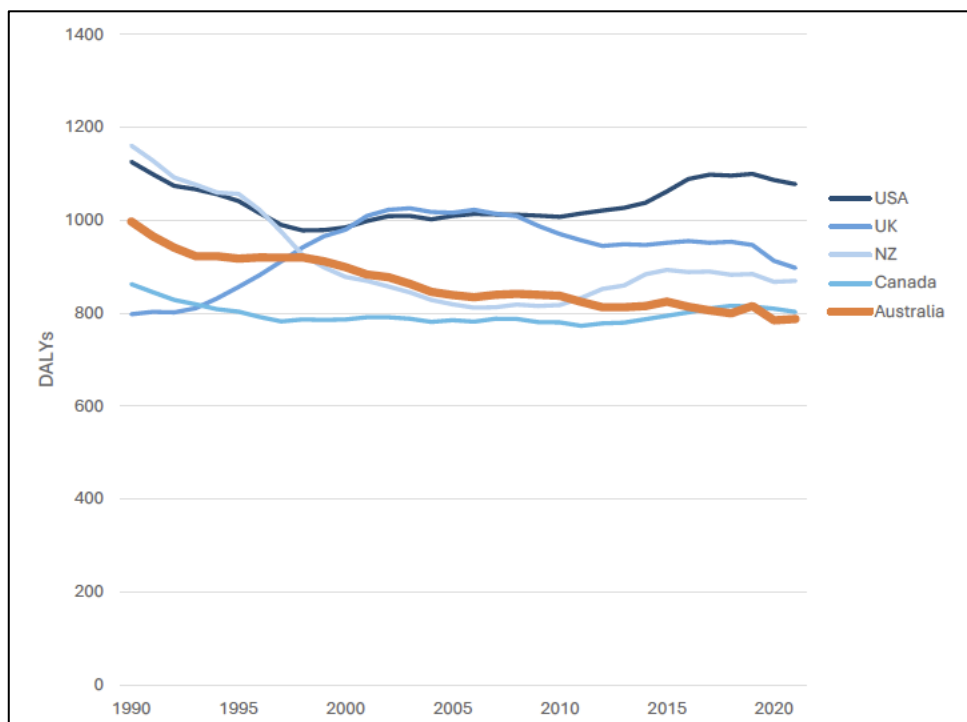


1.2 Alcohol-attributable non-communicable disease and mortality rates also in decline

The burden of disease from high alcohol use in Australia has declined significantly over the last 30 years. The chart below shows Disability-Adjusted Life Years (DALYs) per 100,000 people from 1990 to 2020. DALYs measure the overall burden of disease by combining years of life lost due to premature death and years lived with disability.

The graph below indicates a steady decline in alcohol-related health impacts over the decades, suggesting that Australians are being more responsible with their consumption of alcohol. Importantly, Australia (787.4) now has few DALYs than the USA (1077.6), UK (897.3), New Zealand (869.9) and Canada (802.7).

Graph: All causes attributable to high alcohol use – both sexes, age standardised
(Institute for Health Metrics and Evaluation)



This positive trend is also confirmed in recent analysis by the International Association for Responsible Drinking of the Australian market, using the latest results from the Global Burden of Disease 2021 data release on 16 May 2024.

- High alcohol use has declined in line with the global trend (-3 per cent)
- Mortality rates for all causes attributable to alcohol have declined (-8 per cent)
- Morbidity rates for all causes attributable to alcohol among young people aged 20 years or less have declined (-18 per cent)
- Morbidity rates for all road injuries attributable to alcohol use have declined (-31 per cent).

Australia also has the sixth lowest rate of premature death from non-communicable disease in the world (behind South Korea, Switzerland, Cyprus, Japan and Sweden). These results demonstrate a positive shift in modifiable risk behaviours associated with non-communicable diseases.

1.3 Youth Drinking

The Australian guidelines to reduce health risks from drinking alcohol advise that children and people under 18 years of age should not drink alcohol (NHMRC, 2020).

Results from the 2022–2023 National Drug Strategy Household Survey indicate that younger people are increasingly following this advice, with the age at which people first tried alcohol rising over time. Specifically:

- The average age at which young people aged 14–24 first tried alcohol has steadily risen from 14.7 years in 2001 to 16.1 in 2022–2023.

- Among those aged 14–24, the average age of initiation for males increased from 16.1 in 2019 to 16.2 in 2022–2023, while for females it decreased from 16.3 to 16.1 (AIHW 2024b, Table 4.13).

There has also been a long-term increase in the proportion of young people who abstain from alcohol. From 2007 to 2022–2023, the proportion of people aged 14–17 who abstained increased from 39 per cent to 70 per cent, while for people aged 18–24 it rose from 13.1 per cent to 23 per cent. These proportions remained stable from 2019 to 2022–2023 (AIHW 2024b, Table 4.28).

These significant changes in consumption patterns, especially among young people, suggest long-term and enduring improvements in the drinking habits of Australians that provide important direction and context to policy makers around alcohol regulations and taxation.

1.4 Moderate Consumption of Alcohol

The Australian spirits industry supports the responsible and moderate consumption of alcohol as part of a balanced lifestyle.

In discussing the health impacts of alcohol in Australia, it is important to make the distinction between moderate and other levels of consumption.

Australian adults can make informed decisions about their intake of alcohol because unlike other drugs, alcohol products are heavily and appropriately regulated.

The Commonwealth Government National Medical and Research Council (NHMRC) also publishes guidelines to promote positive choices and reduce health risks from drinking alcohol. The Australian spirits industry always encourages consumers to follow the recommended guidelines to moderate their alcohol consumption.

It is also important to recognise the social and psychological benefits of alcohol. From a social perspective, alcohol can help reinforce social bonds, enhances community engagement^{8 9 10} and often plays a role in celebrating significant life events such as births, deaths, graduations, and marriages, as well as social functions.¹¹

⁸ Allan, J., Clifford, A., Ball, P., Alston, M., & Meister, P. (2012). 'You're less complete if you haven't got a can in your hand': Alcohol consumption and related harmful effects in rural Australia: The role and influence of cultural capital. *Alcohol and Alcoholism (Oxford, Oxfordshire)*, [47\(5\)](https://doi.org/10.1093/alcalc/ags074), 624–629, <<https://doi.org/10.1093/alcalc/ags074>>.

⁹ Halim, A., Hasking, P., & Allen, F. (2012). The role of social drinking motives in the relationship between social norms and alcohol consumption. *Addictive Behaviors*, [37\(12\)](https://doi.org/10.1016/j.addbeh.2012.07.004), 1335–1341, <<https://doi.org/10.1016/j.addbeh.2012.07.004>>.

¹⁰ Davidson, L., Piatkowski, T. M., Pocuca, N., & Hides, L. (2022). Modelling the relationship between environment and cognitive factors in predicting risky drinking among young Australian adults. *International Journal of Mental Health and Addiction*, 1–20, <<https://doi.org/10.1007/s11469-022-00978-9>>.

¹¹ Roche, A., Kostadinov, V., Fischer, J., Nicholas, R., O'Rourke, K., Pidd, K., & Trifonoff, A. (2015). Addressing inequities in alcohol consumption and related harms. *Health Promotion International*, [30 Suppl 2\(suppl 2\)](https://doi.org/10.1093/heapro/dav030), ii20–ii35, <<https://doi.org/10.1093/heapro/dav030>>.

Research from the Australian Institute of Health and Welfare confirms that Australians are moderating their alcohol intake as follows:

- reducing the amount of alcohol consumed at any one time (up from 28 per cent to 31 per cent)
- reducing the number of drinking occasions (from 29 per cent to 31 per cent)
- switching to drinking more low-alcohol drinks (from 5.2 per cent to 6.1 per cent)
- stopping drinking alcohol (6.6 per cent to 7.8 per cent). When asked why they had done so, most people said that it was for health reasons.

Better health was the most common reason selected in 2016 and 2019, but it increased from 50 per cent to 54 per cent and these changes may be because people were more aware that alcohol causes health risks.

It is also important to address the erroneous claim that no level of alcohol consumption is safe for our health. The moderate intake of alcohol appears to have relatively low health risk for many people¹² and some studies have shown an association between moderate alcohol intake and improved health outcomes.

For example, the Harvard University School of Public Health, recognises that there is evidence that moderate drinking can be good for the heart and circulatory system, and may protect against Type 2 Diabetes and gallstones.¹³

The Mayo Clinic states that there is evidence to suggest that mild to moderate alcohol consumption decreases the risk of coronary heart disease and cardiovascular mortality.

When researchers combine breast cancer alongside all other causes of death, the overall relationship is J-shaped. When researchers combine cardiovascular disease alongside other causes of death, the overall relationship is also J-shaped.¹⁴

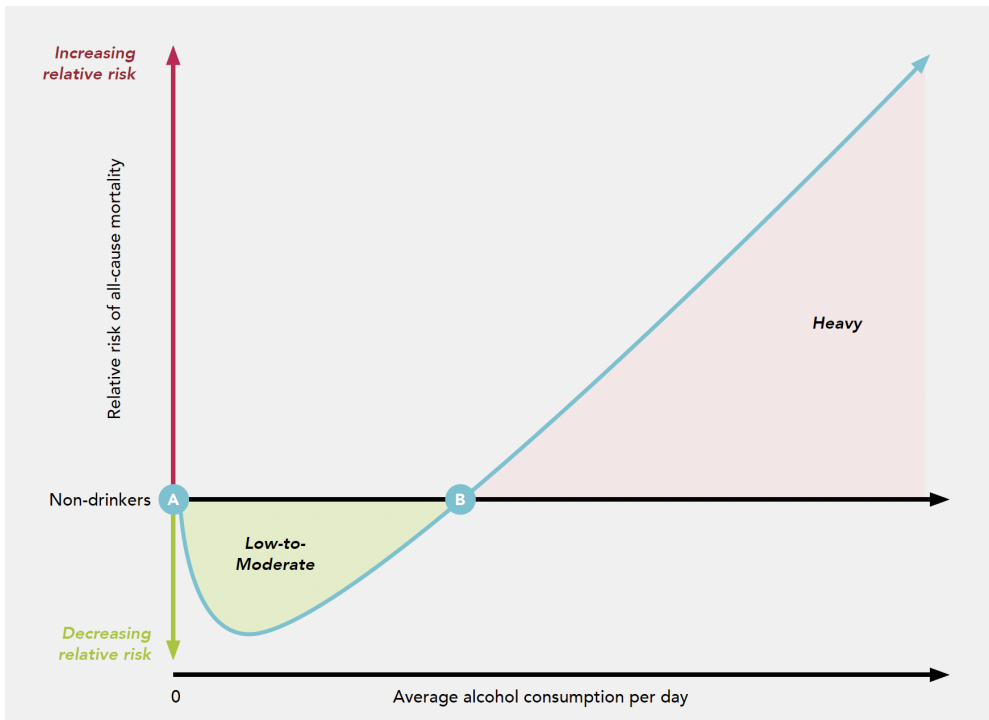
The J-shaped relationship between alcohol and risk of early death has been reported since the 1970s, and has been reproduced in numerous epidemiological and clinical studies since then, including in recent studies.

¹² Jamie L Pronschinke, 'Balancing the risks and benefits of alcohol', 12 October 2021, *Mayo Clinic*, <<https://www.mayoclinichealthsystem.org/hometown-health/speaking-of-health/balancing-the-risks-benefits-of-alcohol>>.

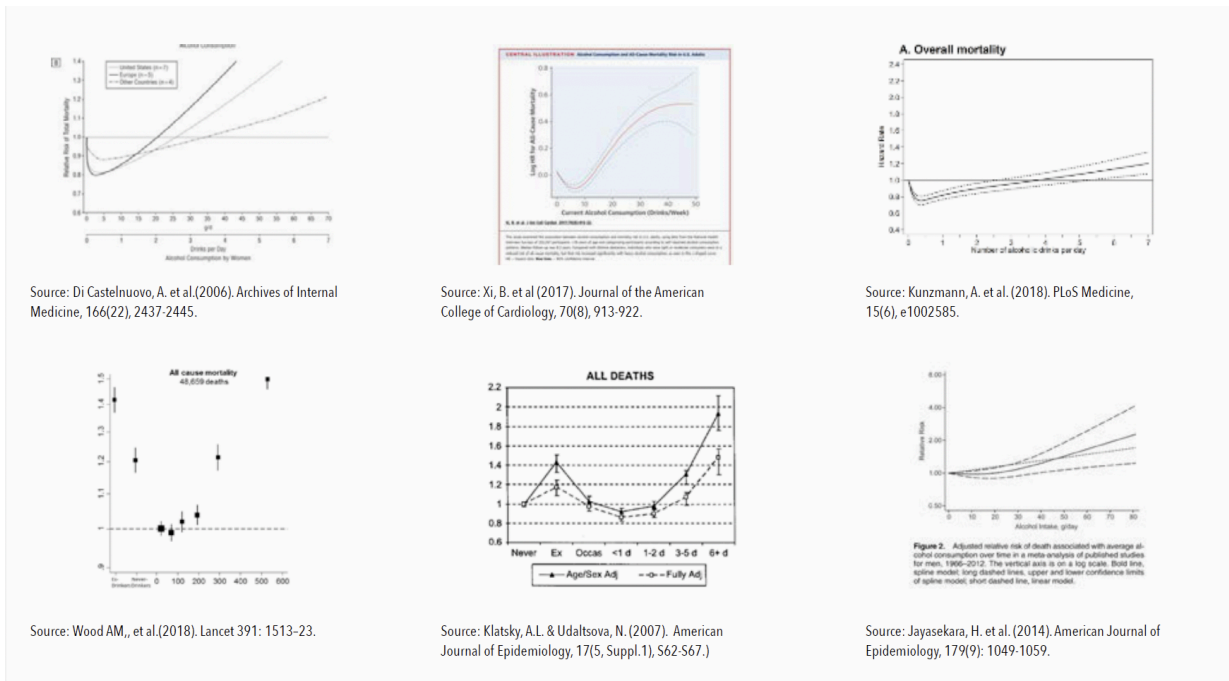
¹³ Harvard T.H. Chan School of Public Health, 'Alcohol: Balancing Risks and Benefits', April 2022, <<https://nutritionsource.hsph.harvard.edu/healthy-drinks/drinks-to-consume-in-moderation/alcohol-full-story/>>

¹⁴ International Alliance for Responsible Drinking, 'Drinking and health outcomes', September 2018.

Graph: The J-Shaped relationship between drinking and risk of all-cause mortality



A J-shaped relationship between drinking and risk of death from all causes continues to be supported by studies, as shown below:



For adults of legal drinking age, moderate alcohol consumption can be part of a well-balanced lifestyle. Various health authorities and clinical studies state that moderate consumption of alcohol may be associated with certain health benefits for some adults, including a protective effect against cardiovascular disease and diabetes.

As alcohol consumption has moderated, a growing number of Australians are also choosing not to consume alcohol.

The National Drug Strategy Household Survey (2023) confirms the number of former drinkers in the population rose from 1.5 to 1.9 million Australians between 2016 and 2019. Further, that decrease in consumption is largely being driven by young people. Twenty-one per cent of 18 to 24-year-olds and 24 per cent of 25 to 29-year-olds do not drink, and both those figures have more than doubled since 2001.

Retail sales data confirms a prolonged reduction in purchase propensity, confirming that consumers are moderating their consumption and reducing – rather than increasing – their purchasing of alcohol by a factor of nearly three to one.¹⁵

Additionally, a NSW Government report titled ‘Are alcohol-free liquor products a gateway to alcohol consumption’ from June 2022 found that:

“Overall, there is little evidence to suggest that an increase in the options and availability of alcohol-free liquor products is a gateway to alcohol consumption or linked to increased alcohol consumption.”¹⁶

¹⁵ Circana, ‘Liquor in Focus: What & Why We Buy – An Overview of Australian Liquor Performance’, April 2024.

¹⁶ NSW Government, ‘Are alcohol-free liquor products a gateway to alcohol consumption’, April 2022, *Liquor & Gaming NSW*, <https://www.liquorandgaming.nsw.gov.au/__data/assets/pdf_file/0006/1093299/are-alcohol-free-liquor-products-a-gateway-to-alcohol-consumption.pdf>.

2. Alcohol is a legal and highly regulated product

The Australian alcohol market is among the world's most highly regulated, with an extensive framework of federal, State and Territory, and local regulations applying to the manufacture and sale of spirits. This provides Australian consumers with the confidence to make informed choices about their alcohol consumption.

2.1 National Alcohol Strategy

Australia is at the mid-point of the National Alcohol Strategy 2019–2028. The Strategy 'provides a guide to inform ongoing development, promotion and coordination of national and locally delivered evidence-based and practice-informed responses to agreed priorities.'¹⁷

The Commonwealth also has the National Drug Strategy 2017–2026.

The governance framework of these strategies includes oversight by the Australian National Advisory Council on Alcohol and other Drugs.

Priority 3 of the Alcohol Strategy relates to support for individuals. It is clear, based on the establishment of this Parliamentary Inquiry, that more work needs to be done on the implementation of the support options listed in the Commonwealth Government's Alcohol Strategy.

The Government and Parliament have a clear opportunity and responsibility to properly resource the implementation of the Strategy.

Recommendation 1:

Implement Priority Three of the National Alcohol Strategy:

- a) Increase screening, assessment, referral, and treatment in primary health care settings and coordination between primary care, acute, and specialist services.
- b) Expand the range of intervention options from brief and early interventions through to withdrawal management, psycho-social interventions, residential rehabilitation, community care, and aftercare programs.
- c) Implement settings-based approaches to identifying, screening, assessment, brief interventions, and referral to minimise alcohol-related problems (e.g. sexual health services; needle syringe programs; maternity, mental and community health and justice health services).
- d) Ensure that specific services for people with severe alcohol and other drug problems are available.
- e) Enhance the capacity of generalist health care, community, welfare, and support services.
- f) Implement tailored interventions across a range of health care settings, including more
- g) investment in detoxification and rehabilitation services for individuals who cannot be treated in the community.
- h) Improve availability of effective psychosocial treatment (e.g. counselling, cognitive behaviour therapies) and social approaches including employment and housing programs.

¹⁷ Department of Health, National Alcohol Strategy 2019-2028 (Canberra: Australian Government, November 2020), 12, <<https://www.health.gov.au/sites/default/files/documents/2020/11/national-alcohol-strategy-2019-2028.pdf>>.

2.2 (a) Government Restrictions

The Commonwealth Department of Health website recognises that alcohol is a legal product, with restrictions relating to:

- age – for example, alcohol cannot be legally consumed under the age of 18.
- where you can consume it – for example, you cannot drink alcohol or smoke in certain places.
- driving – for example, there are limits on blood alcohol concentration when driving.

The Australian Government does not grant licences to distil spirits for personal consumption.

The *Excise Act 1901* and *Customs Act 1901* also specifies definitions and requirements for the production of brandy, whisky and rum.

2.2 (b) Australia New Zealand Food Standards Code

Spirits sold in Australia must comply with the Food Standards Australia New Zealand (FSANZ) Food Standards Code, which defines a 'spirit' as follows: "Spirit means a potable alcoholic distillate, including whisky, brandy, rum, gin, vodka and tequila, which, unless otherwise required by this Standard, contains at least 37% alcohol by volume, produced by distillation of fermented liquor derived from food sources, so as to have the taste, aroma and other characteristics generally attributable to that particular spirit."

FSANZ also includes specific information requirements for labelling of spirits. These include a statement of alcohol content and standard drinks, pregnancy warning labels, and a nutrition information panel, if the product makes any claims about its nutritional content. Additional labelling for energy and added sugars is also currently under review by FSANZ.

2.2 (c) Liquor licensing laws

Spirits manufacturers are required to hold a manufacturing licence issued by the Australian Taxation Office, and a state or territory liquor licence to manufacture and sell alcohol.

Each state and territory in Australia have their own classification system for liquor licences, as well as additional requirements for processes like applying for a development consent, which is administered by local governments.

3. The industry supports moderate and responsible consumption

The Australian spirits industry is committed to the responsible and safe consumption of alcohol. This is evidenced by our voluntary participation in a number of industry-led responsibility campaigns and self-regulatory schemes, as well as individual initiatives by member companies.

3.1 Industry Self-Regulation

The Australian spirits industry has a strong track record of regulatory compliance and working proactively to ensure our products are consumed responsibly. We are committed to ensuring the industry grows safely and sustainably, so that Australians may continue to enjoy our products in a safe and responsible manner.

3.1 (a) The Alcohol Beverages Advertising Code

The Australian spirits industry jointly funds and we are signatories to the Alcohol Beverage Advertising Code Scheme (ABAC) Responsible Marketing Code, which is continually revised to meet community expectations. A revised Code was released in April 2023, following extensive consultation and review.

Founded in 1998, the ABAC Responsible Marketing Code sets key standards for the responsible content and placement of alcohol marketing in Australia. It applies beyond traditional forms of advertising (television, radio, print and outdoor) to alcohol marketing communications in emerging digital and social media.

ABAC signatories represent around 92% of alcohol producer and 65% of alcohol retailer media spend in Australia. Spirits producers are the highest users of ABAC's pre-vetting service, demonstrating our commitment to proactively engaging with ABAC to ensure compliance with the Code.

Updated Code

In 2023 ABAC announced the implementation of a revised and updated ABAC Responsible Alcohol Marketing Code ("Code"). Key changes include:

- Increasing the percentage of adult viewers required before alcohol advertising is permitted around television programmes from 75 per cent to 80 per cent to ensure Australia's Code is best practice globally.
- Expanding the definition of 'Strong and Evident Appeal to Minors' to further ensure that alcohol advertisements do not engage young people.
- Expanding restrictions on the direct marketing of alcohol by toughening requirements to offer opt outs from this marketing and ensure these are honoured.

In addition, the Code now expressly outlines that alcoholic beverages cannot offer therapeutic or health benefits (including mental health) and cannot be used to help overcome problems or adversity.

There is now a specific definition in the Code which outlines that:

"Alcohol Alternative means a beverage that is at or less than 0.5% alcohol by volume that:

- has an appearance and style commonly associated with alcohol; and

- uses a brand or descriptors commonly associated with alcohol, such as, beer, wine, spirit or other; and
- is not a beverage commonly understood as non-alcoholic, such as fruit juice, soft drink, flavoured milk or other which fall outside the Code remit”.

There is also now a definition for Alcohol Alternative Marketing Communications, which are now subject to ABAC by virtue of a new Part 5.

Other changes to the Code include the prohibitions against using social media influencers who are (or appear to be) under the age of 25 years of age.

Also in response to the impact of social media, the wording pertaining to the responsible and moderate portrayal of alcohol in 3(a)(i) and (ii) expands the definition of “excessive consumption” and adds a prohibition on “treat as amusing”. As a result, brands will now be explicitly prohibited from using humorous memes and captions in advertising materials which encourages misuse or irresponsible behaviour related to the consumption of alcohol.

In announcing the changes, ABAC stated that:

“The ABAC scheme is already one of the strictest codes of its kind for alcohol advertising in the world. It is an example of government, industry and other independent stakeholders joining together to ensure alcohol advertising is appropriate and in line with efforts to reduce harmful consumption and protect young people. But we recognise the need for the Code to do more to keep pace with the changing marketing environment, particularly in relation to protecting young people.”

These updates and changes demonstrate that ABAC and the industry continue to ensure that the rules and regulations keep pace with the way that alcoholic products are marketed, sold and delivered.

3.1 (b) Retail Drinks Online Code

Alcohol retailers, in collaboration with producers, government and community, developed the Retail Drinks Online Code as an industry-wide framework to enhance compliance in the responsible online sale and delivery of alcohol. The Code was launched in July 2019 and is continually revised to meet evolving needs, with the latest revision occurring in November 2023. Signatories to the Code represent more than 80% of all alcohol purchased online in Australia.

The code’s principles are designed to minimise the risk of alcohol-related harm, and many have been adopted in various regulatory frameworks by state and territory governments developing have or enhancing licencing regulations to cover the growth of online delivery services.

It is important to note that Australia’s Retail Drinks Online Code was internationally recognised as global best practiced by the International Alliance for Responsible Drinking in May 2021, and the RDA assisted in the development of IARD’s global standards on online alcohol sales and delivering.

The key principles include self-exclusion requests, mandatory training for delivery drivers, a blanket ban on same day, unattended, alcohol deliveries and preventing alcohol deliveries to designated dry zones. Retail Drinks Australia (RDA) further collaborated with the NSW Government in 2021 to develop the responsible supply of alcohol training module.

In addition, signatories to the industry code commit to a compliance audit programme coordinated by RDA on behalf of all signatures and the code administration committee, which oversees the operation of the code. Over 3,2000 audits, have been undertaken across all Australian states and territory since the commencement of this programme.

In 2020 the overall compliance rate was found to be 94%. The compliance order program conducted through an external provider, involves the recruitment of mystery shoppers in all Australian states and territory's age between 18 and 21 and tests delivery drivers to ensure they are requesting identification from mystery shoppers in accordance with the online code and ID25 principles.

Spirits and Cocktails Australia supports the Retail Drinks Australia submission to the Committee on online alcohol sale and delivery, and in particular highlights the references to the Frontier Economics report on online sale and delivery in Australia in 2023 under the section on Domestic and International Approaches to Alcohol Policy.

The factual findings in the Frontier Economics report support the effectiveness of the internationally recognised RDA online code, and provide evidence that contradicts many of the unsupported allegations made by opponents of the alcohol industry in their submissions and evidence to the inquiry about online delivery services.

3.1 (c) International Alliance for Responsible Drinking

The International Alliance for Responsible Drinking (IARD) is a not-for-profit organisation dedicated to addressing harmful drinking worldwide and promoting understanding of responsible drinking, among those who choose to drink. IARD is supported by its member companies from all sectors of the regulated alcohol industry – beer, wine, and spirits – in their common purpose of being part of the solution to reducing the harmful drinking. To advance this shared mission, IARD works and partners with public sector, civil society, and private stakeholders.

IARD members are committed to reducing the harmful use of alcohol and have a long history of working in partnership with others as part of a whole-of-society approach.

The last 10 years have seen declines in binge-drinking, drinking and driving, and underage drinking in many countries. IARD members are committed to building on these positive trends and actively support international goals to reduce harmful drinking. This includes delivering on the recommendations presented to the sector in the United Nations 2018 Political Declaration on non-communicable diseases, in particular by taking concrete steps towards eliminating the marketing, advertising, and sale of alcohol products to minors.

A significant action undertaken by IARD members is the formation of the [Global Standards Coalition](#) to help reduce harmful drinking. This includes industry leaders such as Walmart, SPAR International, Meta, and Uber Eats, alongside IARD's members – the leading global beer, wine, and spirits producers.

Signatories are putting in place policies and practices to prevent the sale and marketing of alcohol to underage people, supporting employees and partners with resources, and are also working together to further reduce harmful drinking and promote moderation among those who choose to drink.

CASE STUDY

International Association for Responsible Drinking Partners with Digital Platforms for Age Assurance

Since 2018, IARD has been working in partnership with digital platforms to enhance responsibility standards for alcohol-related marketing online in support of UN goals to reduce harmful drinking. This pioneering partnership aims to build confidence in age-assurance systems online and to help ensure online alcohol advertising is directed only at adults who wish to engage with drinks brands.

Key outcomes include:

- Hundreds of thousands of influencers around the world can now age-gate posts.
- Leading global marketing and advertising agencies are signed-up to the first-ever global standards for [influencer marketing](#).
- Millions of advertisers can age-gate online marketing on digital platforms.
- IARD members are on track to reach 95% compliance with [Digital Guiding Principles](#) by end of 2024. The five safeguards on brand channels include: age-affirmation mechanism, transparency, user generated content policy, forward advice notice, responsible drinking message.

In 2024, the partnership expanded and made new commitments to further enhance online safeguards, where necessary, to prevent those under legal purchase age inadvertently seeing alcohol advertising online and to provide confidence that age-assurance methodologies on digital platforms are robust by 2025.

As part of this unique collaboration, digital companies have shared transparency reports that summarise the platform-specific safeguards particularly the policies and practices they have in place to assure age.

[Reports: [Google](#), [Meta](#), [Pinterest](#), [Snap](#), [TikTok](#), [X](#)]

3.2 Industry campaigns and activities

The Australia spirits industry continues to promote and support efforts to protect consumers and further improve the drinking habits of customers. This includes the proactive programs and campaigns by DrinkWise, and member initiatives aimed at encouraging responsible consumption.

3.2 (a) DrinkWise

Established in 2005, DrinkWise Australia is an independent, not-for-profit organisation focused on bringing about a healthier and safer drinking culture in Australia.

Through our membership of Drinkwise, we support:

- Promoting a generational change in the way Australians consume alcohol;
- Tackling underage drinking by educating young people about the impact that alcohol has on the development of the adolescent brain; and
- Increasing awareness of the responsible service of alcohol, through moderation campaigns and educational tools to help enhance understanding of a standard drink, that alcohol is alcohol and the impact that harmful drinking can have on the human body.

To promote such significant behavioural changes, DrinkWise develops and implements a range of national information and education campaigns, as well as providing practical resources to help inform and support the community about alcohol use.

These campaigns include, “Always respect, always DrinkWise,” “You won’t miss a moment if you DrinkWise” and the “It’s okay to say nay” campaigns.

3.3 (b) Member initiatives

Members have taken additional steps to promote responsible drinking through global initiatives designed to enhance consumer information and encourage informed choices with regard to alcohol consumption, both in Australia and throughout the world.

CASE STUDY

Diageo Australia: SMASHED Program [Link: [SMASHED](#)]

Smashed is a global alcohol education and attitudinal change programme delivered in Australia by Gibber and sponsored by Diageo Australia as part of its commitment to reducing underage drinking among Australian teens.

Originally developed in the UK, Smashed was created in collaboration with young people and combines drama with interactive workshops to help them understand the facts, causes and consequences of underage drinking. There is no branding in the production and it’s delivered by an independent partner.

Since launch in the Australian market in 2018, Smashed has been performed for more than 300,000 Australian students across years 8, 9 and 10. Following the performance, students are evaluated on knowledge and behavioural change and 95% of students surveyed confirm they are less likely to drink alcohol underage as a result of seeing Smashed.

CASE STUDY

Diageo Australia: DrinkiQ Program [[Links: [DRINKiQ](#)]

The right information empowers consumers to make the right choices and DRINKiQ is one of the most important tools we have in promoting moderation and addressing the harmful use of alcohol.

DRINKiQ was created by Diageo and is intended to complement rather than replace resources offered by governments, charities or independent bodies. Its purpose is to give anyone, regardless of their current circumstances, the facts, tools and support to help them make informed choices about their relationship with alcohol and drinking. In this way, it can be a destination in itself or a portal to access help or information elsewhere.

Last year alone more than 101,000 Australians took the DRINKiQ knowledge test while globally we've reached our target already to reach 1 billion people with dedicated messages of moderation from our brands and education on the risks of alcohol-related harm through our DRINKiQ platform.

4. Changing market

Globally, consumer preferences have changed in favour of higher quality products and a more moderate drinking culture.

As previously stated, a key driver of this phenomenon is ‘premiumisation’, with a growing number of consumers more interested in quality rather than quantity. More consumers prefer spirits as their alcohol beverage of choice, and this is even more so for products with provenance and legacy stories.

In the past decade, spirits products classified as ‘premium or above’ have grown from 25 per cent of category value to almost 35 per cent. ‘Super-premium plus’ spirits have grown in value more than twice as fast as other price tiers in the spirits category.¹⁸

4.1 Consumer demand for ‘experiences’

In line with premiumisation and changing patterns of consumption, consumers are seeking more experiential offerings that celebrate local and indigenous produce, and authentic interactions with brands and producers.

Premium spirits and innovative cocktails offer consumers a unique experience that goes beyond mere consumption.¹⁹ This has supported the growth of world-class hospitality, with several Australian cocktail bars and venues recognised in prestigious international award programs for providing consumers with new and innovative ways to enjoy spirits in moderation. Higher staff-to-patron ratios in these settings also promote responsible consumption and enhanced decision-making regarding patron service.

Distillery door tourism also provides another touchpoint for consumers to interact with producers and brands, bringing important economic benefits to these communities – particularly in the regions, where nearly 50 per cent of Australia’s 700 distilleries are based. Distillery door tourism generated \$58 million in added value to the Australian economy in 2023, with 3.5 million patron visits to distilleries, attracting local and international visitors.

4.2 As consumer preferences have changed, the economic value add of the spirits industry has grown

Unlike geographically-constrained cultivation products, spirits can be made throughout Australia offering additional economic benefits to these areas, by enhancing local tourism, hospitality, and utilisation of accommodation services. Further development of the distilling industry will lead to stronger regional economies that encourage growth in adjacent craft and artisanal industries.

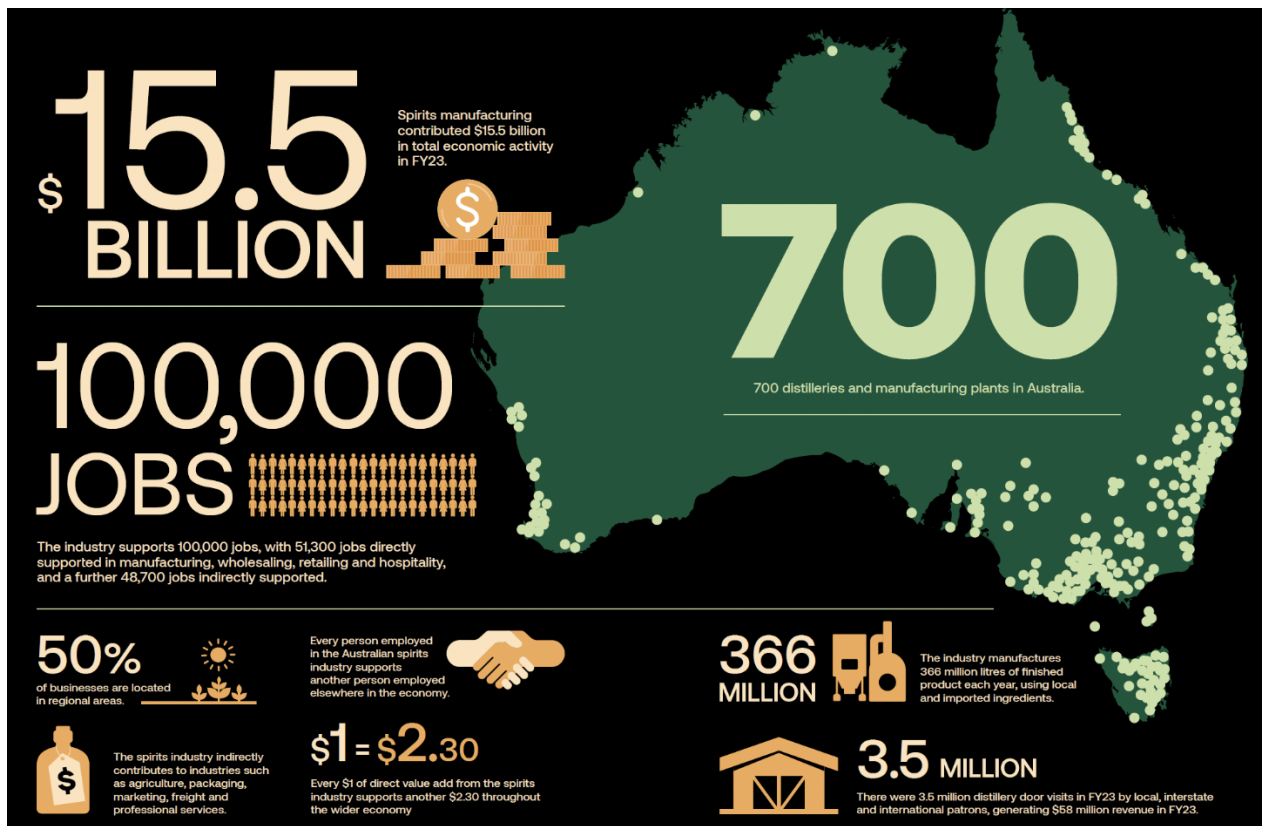
¹⁸ International Wine and Spirits Research, ‘A focus on value over volume will drive growth across beverage alcohol’, 1 August 2022, <<https://www.theiwsr.com/a-focus-on-value-over-volume-will-drive-growth-across-beverage-alcohol/>>.

¹⁹ Trevor Branch, ‘What’s Driving Premiumisation in the Spirits Industry’, 5 July 2023, <<https://www.dimins.com/blog/2023/07/05/whats-driving-premiumization-in-the-spirits-industry/>>

Spirits manufacturing in Australia contributes for \$15.5 billion in added value to the Australian economy and supports almost 100,000 direct and indirect jobs throughout the industry’s total supply chain. The industry comprises 700 distillers and manufacturers, located in every state and territory, with 50 per cent of these operations in regional areas.

These businesses range in size from small craft distilleries, with 88 per cent employing fewer than 20 employees, to global spirits companies with significant local manufacturing operations. Over 80 per cent of the spirits consumed in Australia are manufactured by skilled professionals in manufacturing plants and distilleries across the country.

Graphic: Economic contribution of the Australian spirits industry (2024)



5. Making good progress

The Australian spirits industry recognises that good progress has been made, while also recognising that more can be done to reduce levels of harmful consumption and improve behaviours. However, the evidence does not support over-regulation or heavy-handed restrictions on choice and punitive regulations on alcohol.

5.1 Industry codes and schemes have been successful.

The Australian spirits industry is committed to working with government and other stakeholders to minimise at-risk alcohol consumption and its related harms through collaborative, evidence-based initiatives that promote responsible drinking.

We strongly defend the right of Australians to responsibly produce and sell a legal product that, when consumed in moderation, can be part of a balanced lifestyle.

The industry points to the effectiveness of the current arrangements as evidenced by positive improvements to drinking behaviours and culture.

We also note we note findings from National Drug Strategy Household Surveys suggesting that community concern is not centred on pursuing further restrictions on alcohol advertising or sponsorship. The current industry codes and schemes provide a flexible, accountable, transparent, and non-bureaucratic structure that can adapt quickly to changing consumer expectations and an evolving digital environment.

The evidence clearly shows that Australians are drinking more responsibly. The industry will continue to promote and develop the necessary industry codes to better protect consumers, while supporting initiatives that promote responsible drinking.

5.2 Australian spirits excise delivers a significant financial contribution to the national health system.

The Australian spirits industry has been proactive and focused on reducing alcohol-related harm. We are supportive of both state and federal government efforts to address alcohol misuse, where measures are targeted and produce tangible outcomes.

The spirits excise and taxes paid by the industry are significant contributors to government services including health care, the promotion of responsible drinking and other harm reduction initiatives.

However, these contributions should be based on the principle that a standard drink is the same, in terms of its alcohol content, whether it is consumed as beer, wine or spirit drink.

5.2 (a) Defining a standard drink

A standard drink is defined as 10 grams of alcohol (equivalent to 12.5mL of ethanol) and is the same whether it is consumed as a beer, wine or spirit drink. On average, this is the amount of alcohol the human body can process in one hour.²⁰

Spirits are the only category of alcohol where a standard serve is typically one standard drink. For example, a nip of premium whisky at 40 per cent alcohol-by-volume is one standard drink – compared to a 375mL can of full-strength beer, which is 1.4 standard drinks, or a 150mL glass of red wine (typical restaurant serve), which is 1.6 standard drinks.²¹

As an industry, we believe that this should also be reflected in regulation aimed at reducing harmful drinking. Policies that favour categories with lower alcohol concentrations (ABV) create misperceptions that these are ‘safer’ than others and may encourage harmful drinking, for example, by young people or during pregnancy, undermining efforts to reduce alcohol-related harm. In reality, it is not *what* you drink that causes harm, but *how* you choose to drink wine, beer and spirits.

To counter these misperceptions, we support government-issued drinking guidelines and definitions of ‘standard drinks’ that are based on alcohol content and apply uniformly across all beverage categories. The concept of the standard drink acknowledges that alcohol is alcohol and present in equal amounts in a usual serving, whether of wine, beer, or spirits.

5.2 (b) Defining apparent alcohol consumption

The Australian Institute of Health and Welfare defines apparent consumption as the total amount of alcohol either produced in Australia or imported into Australia, that will be sold to people living in Australia. The definition assumes that all alcohol that was produced or imported was consumed in the same financial year. No corrections are made for beverages that may have been wasted, used in cooking, cellared, or otherwise not consumed, and beverages that were purchased overseas and brought into the country duty-free are also not included.

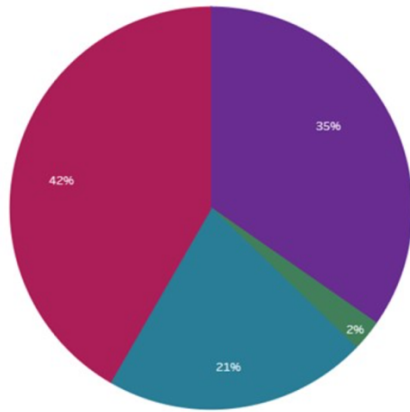
Spirits consumption makes up 21 per cent of apparent alcohol consumption in Australia, compared to 42 per cent wine, 35 per cent beer and 2 per cent cider.²²

Graph: Apparent consumption of alcohol by beverage type (AIHW, 2023)

²⁰ Drinkwise 2024, *How Much Have You Had to Drink?*, < <https://drinkwise.org.au/drinking-and-you/how-much-have-you-had-to-drink/#>>

²¹ Ibid.

²² AIHW, ‘Apparent Consumption of Alcohol in Australia, 2023’, <<https://www.aihw.gov.au/reports/alcohol/apparent-consumption-of-alcohol-in-australia/contents/apparent-consumption-of-alcohol-in-australia-1944>>



Types of beverage: ■ Beer ■ Wine ■ Spirits ■ Cider

5.2 (c) Highlighting the differences between apparent alcohol consumption and alcohol taxation

Alcohol taxes collected by the Federal Government vary markedly from apparent alcohol consumption, as shown in the table below:

	% Apparent alcohol consumption (2023)	% Tax revenue (Budget forecast to 30 June 2024)	\$ Tax revenue (Budget forecast to 30 June 2024)
Beer	35%	30%	\$2,630 billion
Wine	42%	12%	\$1,080 billion
Spirits	21%	57%	\$4,986.4 billion*
Cider	2%	1%	\$33.6 million
TOTALS	100%	100%	\$8,730 billion

* Includes tax attributable to 'other alcoholic beverages', which is mostly ready-to-drink (RTD) products. The table above attributes 2% of this tax classification to cider to reflect the apparent alcohol consumption figures.

As spirits and beer excises are adjusted twice per year in line with the Consumer Price Index (CPI), the disparity between alcohol categories continues to grow.

As the evidence in this submission has shown, there is no public policy or health rationale for the disparity in tax settings between alcohol categories to address potential alcohol-related harms.

5.2 (d) Unintended consequences of high alcohol taxation

In reviewing the impact of alcohol and other drugs in Australia, consideration should be given to adjacent policy areas which may drive unintended health outcomes and economic consequences.

While alcohol is highly regulated, the Australian Tax Office (ATO) is concerned about the volume of alcohol products entering the Australian domestic market for consumption without the required excise or customs duty being paid, as high excise is driving increased illicit activity.

In an article published earlier this year in Melbourne's *The Age* newspaper titled, 'Fake Booze: It's scary and the public needs to be warned', the Australian Taxation Office (ATO) estimates that modern-day 'bootleggers' avoid more than \$745 million in alcohol excise each year.

"Some of the syndicates use denatured spirits that are used to manufacture paint stripper, brake fluid, solvents, lacquers and synthetic rubber.

"The ATO says the toxic chemicals found in the backyard booze "are all unfit for human consumption and can cause serious illness or death".²³

The ATO estimates that around \$660 million or 88.4 per cent of the unreported alcohol duty is because of illicit activity in the shadow economy.

The World Health Organisation (WHO) has previously estimated that the unrecorded alcohol market in Australia is 7.5 per cent of total per capita alcohol consumption.

While the ATO has increased its focus stemming this illicit activity, it is important that the issue be addressed holistically so as not to undermine the significant progress that has been made in creating a safer and more responsible drinking culture in Australia.

²³ John Silvester, 'Fake Booze: It's Scary and the Public Needs to Be Warned', 27 April 2024, *The Age*, <<https://www.theage.com.au/national/victoria/fake-booze-it-s-scary-and-the-public-needs-to-be-warned-20240425-p5fmjg.html>>.

6. Targeted interventions can assist vulnerable and at-risk groups

The Australian spirits industry, through Spirits & Cocktails Australia and the Australian Distillers Association, recognises the importance of having the best protections and frameworks to support the continued responsible consumption of alcohol in the Australian community.

We acknowledge that more can be done to deliver targeted support to those most at risk to mitigate the negative impact of alcohol and drug use in Australia.

6.1 Indigenous communities

Governments across Australia, as well as the alcohol industry recognise the specific health challenges faced by indigenous Australians.

The rates of both long and short term [risky drinking](#) among First Nations people have declined substantially, from almost 1 in 2 (48 per cent) in 2010 to 1 in 3 (33 per cent) in 2022–2023. There was also a decline in the proportion of First Nations people drinking more than 10 standard drinks per week on average, from 37 per cent in 2010 to 22 per cent in 2022–2023.²⁴

According to AIHW, First Nations people were 1.2 times as likely as non-Indigenous people to have consumed **no** alcohol in the previous year. The ‘Review of the harmful use of alcohol among Aboriginal and Torres Strait Islander people’ states from the outset that:

“Most Aboriginal and Torres Strait Islander and non-Indigenous people alike consume alcohol in a manner that does not cause harm.”²⁵

The Commonwealth Department of Health states that “**Aboriginal and Torres Strait Islander peoples are less likely to drink alcohol than other Australians.**” But those that do drink are more likely than other Australians to:

- drink at dangerous levels – both over a lifetime and on a single occasion.
- go to hospital for alcohol-related conditions such as liver disease.²⁶

The AIHW data also shows that while the proportion of First Nations people who consumed 11 or more standard drinks in a single day, either yearly or at least monthly on average, has decreased since 2010, First Nations people were more likely to have consumed 11 or more standard drinks in a single day than non-Indigenous people in 2022–2023.

Alcohol consumption is a complex, multi-determined behaviour, influenced by a range of biological and environmental factors, social and economic determinants and emotional wellbeing factors, including trauma, coping with stress, and peer pressure.

²⁴ AIHW, ‘NDSHS 2022-23: First Nations people’s use of alcohol, tobacco, e-cigarettes and other drugs’, 29 February 2024, <<https://www.aihw.gov.au/reports/first-nations-people/first-nations-use-alcohol-drugs>>.

²⁵ Gray D, Cartwright K, Stearne A, Siggers S, Wilkes E, Wilson M (2018) Review of the harmful use of alcohol among Aboriginal and Torres Strait Islander people. Australian Indigenous HealthInfoNet.

²⁶ Commonwealth Department of Health & Aged Care, ‘Alcohol and Aboriginal and Torres Strait Islander peoples’, 21 October 2020, <<https://www.health.gov.au/topics/alcohol/alcohol-throughout-life/alcohol-and-aboriginal-and-torres-strait-islander-peoples>>

‘Focusing on prevention’, is one of the key priority areas of the National Aboriginal and Torres Strait Islander Health Plan 2021–2031, with a specific reference to alcohol consumption.²⁷

The evidence demonstrates that additional controls may be useful in restricting the availability of alcohol where such restrictions help to close the gap between alcohol harm in indigenous and non-indigenous Australians. For example, those contained in state and territory regulations, as well as the Retail Drinks Australia Online Code can be effective in reducing alcohol-related harm in Aboriginal and Torres Strait Islander communities.

Various state and territory level liquor licensing acts permit liquor licensing authorities to impose additional restrictions in particular towns. This can be initiated by the authority, or at the request of Aboriginal and Torres Strait Islander communities or other key stakeholders – such as the police or government health agencies.

There is international and national evidence, as well as from some of these localities, for the effectiveness of these restrictions in reducing alcohol consumption and related harm.

There is strong support for this approach from Aboriginal and Torres Strait Islander people themselves with 79% of remote Aboriginal and Torres Strait Islander communities in the NT having declared themselves ‘dry’ under provisions of the NT liquor act.²⁸

6.2 Domestic Violence Restrictions

There is no place for violence in Australian society and the Australian industry supports initiatives to prevent it from occurring.

The industry recognises the role that alcohol can play as a risk factor. AIHW states that risk factors may include, “age, gender, sexual orientation, race, culture, history of child maltreatment (including exposure to violence as a child), alcohol and other drug use, mental health issues, lower levels of educational attainment, employment (including job loss), financial or personal stress (including poverty) and a lack of social support.”²⁹

The *National Plan to End Violence against Women and Children 2022–2032* sets out how, as a nation and society, we can end violence against women and children over the next 10 years. The Australian spirits industry welcomes this focus and approach, along with targeted and proportionate interventions to achieve this goal.

²⁷ <https://www.health.gov.au/sites/default/files/documents/2022/06/national-aboriginal-and-torres-strait-islander-health-plan-2021-2031.pdf>

²⁸ Gray D, Cartwright K, Stearne A, Siggers S, Wilkes E, Wilson M (2018) Review of the harmful use of alcohol among Aboriginal and Torres Strait Islander people. Australian Indigenous HealthInfoNet.

²⁹ AIHW, 2024, ‘Family, domestic and sexual violence: Factors associated with FDSV’, <<https://www.aihw.gov.au/family-domestic-and-sexual-violence/understanding-fdsv/factors-associated-with-fdsv>>

7. Improving labelling and consumer information

With the rise of globalisation and technological competition, the food and beverage supply chain has grown more complex, and many traditional systems fail to address the increasing requirement for accountability and transparency in the food supply chain.

Technology, in particular the ubiquity of smart phones and digital apps, has changed the landscape for how people obtain nutrition-related information about their food and beverage choices. The use of smart labels and QR codes on food labelling means conventional labelling may be an analogue solution for an increasingly digital world.

In response to these challenges, the Australian spirits industry would like to see QR codes evaluated for potential use in alcohol labelling, especially as a means to provide more detailed and targeted information to consumers.

The list of general mandatory labelling requirements stipulated by Food Standards Australia New Zealand (FSANZ) includes:

- Name/Description
- Lot Identification
- Name and Address of Supplier
- A Statement of Ingredients
- Advisory Statements (Allergens)
- Date Marking
- Statement of Storage Conditions
- Nutrition, Health and Related Claims
- Country of Origin

In addition, alcohol products must also display:

- Volume Statement
- Statement of Alcohol Content
- Statement of Standard Drinks
- Restriction on Use of Geographical Indications
- Pregnancy Warning Label

Research by the Centre for Surveillance and Applied Research, Public Health Agency of Canada, published in the Lancet in July 2024, found that there was a “low certainty” for alcohol container labels bearing health warnings to slow the rate of alcohol consumption, a “moderate certainty” on labels reducing alcoholic beverage selection, a “low certainty” on reducing consumption during pregnancy and “moderate certainty” on reducing consumption before driving.³⁰

³⁰ The effects of alcohol container labels on consumption behaviour, knowledge, and support for labelling: a systematic review, Zuckermann, Alexandra M E et al., The Lancet Public Health, Volume 9, Issue 7, e481 - e494

According to a study by Department of Population Medicine at Harvard Medical School³¹, exposure to alcohol warning labels was low:

- only 13 per cent of participants reported reading or looking closely at the label *often* (8 per cent) or *all of the time* (5 per cent)
- 20 per cent reported reading or looking closely *sometimes*.
- Two-thirds of participants reported they *never* (49 per cent) or *rarely* (19 per cent) read or look closely at the current alcohol warnings.

The Australian alcohol industry believes that more labelling is not the answer.

Consumers are already time poor and overloaded with messaging, with over-crowding on alcohol bottles a potential risk for the effectiveness of conveying existing regulatory information.

Adopting QR codes on alcohol labelling would complement existing on-label information, while providing a mechanism to convey additional information to support responsible decision-making by consumers. This will also enable producers to be more responsive to changing consumer information demands, whilst simultaneously reducing the administrative and cost burden involved with repeated printed label changes.

Recommendation 2:

Adopt QR technology to enhance consumer information and reduce the administrative and cost burden on spirits manufacturers to make regulatory changes to product labels.

³¹ Grummon AH, Ruggles PR, Greenfield TK, Hall MG. Designing Effective Alcohol Warnings: Consumer Reactions to Icons and Health Topics. *Am J Prev Med.* 2023 Feb;64(2):157-166. doi:

8. Commitment to moderation and responsibility

The Australian spirits industry is committed to promoting a culture of moderation and responsibility among Australian who choose to consume our products, respecting the choice of adults to make informed decisions about whether and how much they drink.

We recognise that a wide range of important social changes have occurred in Australian society over the past few decades that are changing our drinking behaviours.

As an industry we must continue to adapt to changing social expectations and consumer preferences.

Secondly, the Australian spirits industry affirms our commitment to supporting government on fit-for-purpose and proportionate measures to address alcohol-related harms.

However, we also oppose unnecessary or potentially damaging policy settings that impose overly restrictive laws and regulations that erode the choice and freedom of adults to make informed decisions about their drinking.

The industry recognises the role of sensible and practical laws and regulations that protect consumers and vulnerable Australians.

We also recognise that the current arrangements have resulted in significant improvements.

Contrary to the claims made by some, these changes are not temporary or an anomaly, as younger generations have fundamentally changed their levels and patterns of consumption,³²and moderation emerges as a new societal norm among Australians that choose to consume alcohol.

As responsible producers with close connections to consumers, it is important that the industry is involved in developing targeted solutions to assist vulnerable and at-risk communities, so that we may complement and support any initiatives to assist these communities.

³² Creswell, K.G., Hisler, G.C., Lyons, G. *et al.* Changes in alcohol consumption and alcohol problems before and after the COVID-19 pandemic: a prospective study in heavy drinking young adults. *Nat. Mental Health* 2, 728–739 (2024), <<https://doi.org/10.1038/s44220-024-00247-9>>.

9. Conclusion

The consumption of alcohol plays an important social role in Australia and when consumed in moderation, it can be enjoyed as part of our way of life.

Drinking alcohol often occurs during social events and gatherings, including celebrations. These types of events play an important role in social connection, supporting wellbeing for Australians.

The health impacts of alcohol in Australia are aligned with the improving drinking habits of Australians.

However, excessive drinking can have detrimental health outcomes. Therefore, the Australian spirits industry – as part of the broader alcohol beverages industry – plays an active role in supporting responsible and moderate consumption. The industry adheres to important codes governing alcohol labelling, marketing and service, as well as supporting responsible drinking behaviours and positive choices.

Encouragingly, Australians are making conscious decisions to moderate and drink responsibly, confirmed by trends such as premiumisation in spirits.

The Australian spirits industry remains committed to protecting consumers and to promoting the responsible and moderate consumption of alcohol.

With a focus on its consumers, the wider alcohol industry continues to innovate and evolve to enhance our reputation as a responsible contributor to the Australian economy.