

AODCCC Position Statement – Response to Alcohol Home Delivery Regulations

Alcohol and Other Drug Consumer & Community Coalition (AODCCC) response to Alcohol Home Delivery Regulations in Western Australia (WA).

About AODCCC

The AODCCC is the peak body for alcohol and other drug consumer-driven systemic advocacy in Western Australia. Our aim is to empower the voices of consumers, their families, and supports, who are impacted by alcohol and other drug use.

AODCCC is a membership-driven not-for-profit association with 461 members as of 27/04/23

It is our commitment to ensure that these voices are heard and can stand side to side with community leaders, sector professions, policy makers and government to educate and inform while addressing the common stigmas associated with alcohol and other drug use in our society. Our mission is to promote the interests, education, and welfare of those affected by alcohol and other drug use through community understanding, shaped by the voice of people and families with a living or lived experience of alcohol and other drugs.

Background

The online alcohol industry is rapidly expanding, and was further influenced by the restrictions placed on society during the Covid-19 pandemic [1]. With more people having access to the internet, online platforms which mimic ‘bottle shops’ are widespread, and the sale and delivery of alcohol is achievable at the click of a button.

Given the growth of this industry, on 1 February 2022, The WA State Government introduced new [regulations around alcohol home deliveries](#), which are scheduled to be reviewed 18 months from the date they came into effect [2].

Despite the home delivery regulations being implemented by the State Government, in an attempt to reduce alcohol-related harms, new research commissioned by Cancer Council WA indicates that these regulations are not always adhered to [3]. As a community we should have trust in our Government to uphold measures which have been implemented for public safety.

Harms from alcohol in Western Australia remain at a concerning level and the alcohol-induced death rate is the highest it has been in 10 years [4]. What’s more, the intersection of alcohol-related issues such as violence, road traffic fatalities, and disease continue to negatively impact our community [5].

Impact on Young People

Of particular significance, are the impacts on our youth and emerging population. Research demonstrates a direct relationship between increased alcohol access with increased alcohol consumption amongst young people. Adding to this is the knowledge that earlier use of alcohol increases the risk of developing an alcohol use disorder later in adulthood [6]. In 2020, research demonstrated that on-demand delivery services were utilised most by 18- to 29-year-olds. Concerningly, over a quarter of these service users reported that these platforms enabled them to continue drinking when they would have ordinarily stopped [7]. The convenience of these services facilitates a pathway to heavy, risky drinking behaviours and patterns. Given that young people are the largest users of technology, it is important the WA Government carefully considers the potential long-term implications that their current decisions may have on future generations.

Digital Marketing

Of further concern is the complexity of the ever-evolving digital alcohol market and the delayed oversight by the government to address this. As opposed to traditional campaigns viewed on posters and televisions, the digital world allows the liquor industry to target consumers across multiple and varied online platforms, with little control from the user themselves. Advertising rules are largely dominated by the alcohol companies through the ABAC (Alcohol Beverages Advertising Code), which is voluntary, and a gross conflict of interest given they are designed and run by alcohol industry lobbyists [8].

Many online alcohol services also have 'afterpay' available to purchasers. This means that individuals' who don't have the immediate funds available for alcohol use, can still access it. This has potential to have a residual impact not only from an individual level, whereby a person could accumulate debt, leading to other varied psycho-social implications, but also on the system and resources available to support the repercussions.

AODCCC's Recommendations

Even with Home-Delivery regulations in place, the question arises as to whether the existence of alcohol home delivery services have any benefit to the community at all? Particularly, if there is no guarantee that those implemented are enforced. With the well-established evidence of alcohol home delivery harms, as well as alcohol-related harms in general, to allow the continuing growth of this industry would be negligent and demonstrates a prioritising of economic and financial gain above public safety.

In a licensed public venue (inclusive of bottle shops), trained Responsible Service of Alcohol (RSA) staff are able to observe a patron's behaviour, alcohol consumption, engagement with others and overall wellbeing, in order to accurately make an informed assessment around their intoxication levels. Furthermore, they are able to provide necessary interventions to support the individual's safety if required. An RSA trained delivery driver does not have the same capacity to assess/support an individual during a brief interaction at the patron's front door.

The AODCCC calls on the WA Government to protect current and future West Australians and recommends that the following points be acted upon.

- The AODCCC calls for an immediate review of the current Alcohol Home Delivery Operations and Regulations in WA, inclusive of digital alcohol marketing, as a way of minimising alcohol-related harms.
- Lived and Living Experience representation and other AOD stakeholders should be included in any review processes, to best inform proposed outcomes. Alcohol industry lobbyists should be excluded due to conflict of interests.
- Priority should be given to implementing comprehensive mechanisms and regulations which restrict and guide digital alcohol marketing. Current practices store individual's data and information and use this to generate algorithms which individually target online users and encourage the use of their platforms.
- The AODCCC advocates for the immediate removal of all 'buy now pay later' alcohol services. Loyalty rewards, incentives and/or promotions which further encourage alcohol purchasing should also be excluded from alcohol-sale platforms.
- Limits to the amount of alcohol an individual can order on one occasion and time between orders should be implemented and determined by health experts. Extra consideration needs to be given towards safeguarding a customer's ability to bypass these limits by utilising multiple platforms on one given day.

References

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