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Alcohol and Guidelines Project Team
National Health and Medical Research Council GPO Box 1421
CANBERRA ACT 2601

By email: alcohol@nhmrc.gov.au

Dear Sir/Madam

Draft Australian Guidelines to Reduce Health Risks from Drinking Alcohol

Thank you for the opportunity to provide feedback on the Draft Australian Guidelines to Reduce Health Risks from Drinking Alcohol (herein referred to as "the Guidelines").

Under the Commissioner for Children and Young People Act 2006¹ it is my role to advocate for the rights of all children and young people under the age of 18 years in Western Australia (WA) and to promote and monitor their wellbeing. In doing so I must have regard for the United Nations Convention on the Rights of the Child (UNCRC) and give priority to Aboriginal children and young people, and children and young people who are vulnerable or disadvantaged for any reason.

As the Commissioner for Children and Young People I have a statutory responsibility to monitor and review laws, policies, practices and services that affect the wellbeing of children and young people in WA under the age of 18. I work under the principles that children and young people are entitled to live in a safe, nurturing environment and to have their views taken into consideration in any decision-making process.

My office has consulted widely with WA children and young people about how alcohol consumption impacts their communities, their families and the young people themselves². Aboriginal children and young people, in particular, have raised alcohol as a significant concern and have spoken out about living in communities where excessive alcohol consumption makes them feel unsafe and harms their health, mental health and wellbeing³.

¹ Commissioner for Children and Young People Act 2006 (WA).

² Commissioner for Children and Young People WA 2011, *Speaking out about reducing alcohol-related harm on children and young people, the views of Western Australian children and young people*, Perth.

³ Commissioner for Children and Young People WA 2017, *Report on the consultation with children and young people in the Fitzroy Valley about alcohol*, Perth.

Recently my office consulted with 4,912 children and young people in WA and asked them about alcohol use:

- Nearly three-quarters (72.6%) of students in Years 7-12 think people their age should not use alcohol or drugs.
- One-third (30.9%) of Year 10-12 students think it is okay for people their age to drink alcohol.
- One-half (49.0%) of Year 10-12 students who had ever drunk alcohol reported having drunk alcohol in the last 4 weeks.⁴

It is evident from these findings that the majority of children and young people aged twelve to 18 years do not use alcohol, however a third of young people aged fifteen to 18 years are at risk of alcohol related harm and would benefit from strategic measures and explicit education to reduce the risks from drinking alcohol.

I appreciate the opportunity to provide a response to the Guidelines and submit the following comments in the interests of protecting children and young people from the harms of alcohol consumption.

Guideline One: Reducing the risk of alcohol-related harm over a lifetime

I support adults to lower the risk of alcohol-related harm by reducing their consumption of alcohol to no more than 10 standard drinks per week and no more than 4 standard drinks on any one day. I commend the recommendation for no alcohol consumption where drinking endangers the lives of children and young people such as pregnant and breast feeding women and people who are supervising children.

I propose that 5.8.2 of the Guidelines, "...young adults are encouraged to take steps to minimise the risk of accidents and injury and other harms related to alcohol" be expanded to succinctly identifying how young adults aged eighteen to 25 years may reduce their risk, for instance by consuming less than the recommended amount of alcohol.

Guideline Two: Children and young people under 18 years of age

I support the recommendation and evidence-base presented in Guideline Two that children and young people under 18 years of age should not drink alcohol. I endorse the key message that alcohol use at an early age increases the risk of injury, can impair brain development and places children and young people at a greater risk of long-term, alcohol-related harms.

While the need for more specific, Australian-based research on the harmful effects of alcohol on children and young people is apparent, I was encouraged by the evidence-based direction in the Guidelines for parents and carers to protect children and young people from consuming alcohol until they turn 18 years.

⁴ Commissioner for Children and Young People 2020, *Speaking Out Survey 2019 Summary Report*, Commissioner for Children and Young People WA, Perth.

Guideline Three: Pregnancy and breastfeeding

I support Guideline Three recommending that women who are: planning a pregnancy; are pregnant; or breastfeeding, should not drink alcohol. The evidence base presented clearly outlines the harms for a developing foetus and for young babies when mothers drink alcohol whilst pregnant or breastfeeding. The benefits for not drinking while pregnant are fortified with strong evidence linking alcohol consumption during pregnancy with birth defects and lifelong cognitive and social issues such as FASD.

The information for breastfeeding mothers is practical and clearly states that breastmilk is only alcohol-free when the mother's blood alcohol is zero. The adverse impacts of alcohol consumption on breastfeeding infants may include limited ability to breastfeed, psychomotor deficits and sleep disorders. Again, the Guidelines expose a gap in evidence exploring the full effect of alcohol on the breastfeeding baby and demonstrate a need for more in depth studies into this important area.

I am supportive of the Guidelines that protect children and young people from the more widespread effects of excessive alcohol use by encouraging lower levels of alcohol consumption and creating healthier communities. It is also worth noting that children and young people are heavily influenced by community role models, advertising and significant people in their lives and observation of an adult drinking culture develops expected drinking behaviours⁵.

Although the proportion of children and young people abstaining from alcohol consumption have increased, there is a need for continued and sustained efforts to reduce the health impact for children and young people. Children and young people have repeatedly expressed their concerns on a range of alcohol related issues including the reduction of alcohol intake in communities where the harmful use of alcohol causes detrimental health and social consequences. Responding to the fears of children and young people in the Fitzroy Valley, I supported the extension of liquor restrictions⁶ to keep these children and young people safe from the harmful effects of alcohol and called for the introduction of a minimum floor price for alcohol as another step towards creating a safe and healthy community⁷.

Whilst I appreciate that it is not within the scope of the Guidelines, making it tougher and more expensive for people to access alcohol, and ensuring that children and young people are well educated on the health and social impacts of alcohol consumption are important strategies to reduce the risk of alcohol related harm.

⁵ Randolph KA, Cheatham LP, Weiss UK, Williams J. 2018. *Exposure to parent and peer alcohol use and the risk of drinking onset and escalation among adolescents*. Child and Adolescent Social Work Journal. 2018;35 (2): 97-106.

⁶ Commissioner for Children and Young People, August 2016, viewed on 12 February 2020 at https://www.cyp.wa.gov.au/media/2247/liquor-restrictions-amendment-objection-fitzroy-valley_aug2016.pdf

⁷ Commissioner for Children and Young People, October 2018, viewed on 12 February 2020, at <http://www.cyp.wa.gov.au/news/commissioner-supports-calls-for-introduction-of-minimum-floor-price-for-alcohol>

I appreciate the opportunity to review and provide comment on the draft Guidelines. Please contact my office if you would like further clarification on any of the content in this letter.

Yours sincerely

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