

2 March 2020

Alcohol Guidelines Project Team
National Health and Medical Research Council (NHMRC) GPO Box 1421
Canberra ACT 2601

By email: alcohol@nhmrc.gov.au

Dear Sir/Madam,

Retail Drinks Australia (**Retail Drinks**) welcomes the opportunity to provide a submission to the National Health and Medical Research Council's (**NHMRC**) Draft *Australian Guidelines to Reduce Health Risks from Drinking Alcohol* (**the Guidelines**) and acknowledges the significant volume of work undertaken to date on their development.

Retail Drinks is also appreciative of the NHMRC's acceptance of its request for a one-week extension on the original deadline for submissions in an email received from the Alcohol Guidelines Project Team dated 12 February 2020.

About Retail Drinks:

By way of background, Retail Drinks is an industry body representing all off-premise packaged liquor retailers in Australia with the clear vision and purpose of enhancing its members' freedom to retail responsibly through positive and proactive advocacy. Retail Drinks represents more than 4,500 packaged liquor licences (**PLLs**) across Australia, including:

- Major liquor retailers with a large national footprint, such as Coles Liquor and Endeavour Drinks;
- Retail banner membership such as Liquor Marketing Group, Liquor Stax, IBA (Independent Brands Australia and all of its subsidiary retail brands), Liquor Legends and ILR;
- National online retailers including Vinomofo, Shorty's Liquor, Good Pair Days, Tipple and Beer Cartel;
- Independent liquor store owners (who are predominantly small businesses); and
- National liquor suppliers, including Treasury Wine Estates, Coca Cola Amatil, Pernod Ricard, Asahi, Coopers Premium Beverages, Lion Beer Australia, Australian Liquor Marketers, Brown-Forman, William Grant & Sons, Campari, Diageo and CUB.

Introduction

Retail Drinks recognises the importance of the role played by the NHMRC in developing the Guidelines which have continuously been in place since 1987.¹ Retail Drinks considers the Guidelines to be a key educational

¹ Australian Government, National Health and Medical Research Council (2019) *Draft Australian Guidelines to Reduce Health Risks from Drinking Alcohol*,

resource to assist and inform the Australian public in their decision-making around responsible alcohol consumption.

Retail Drinks is supportive of the Guidelines' overarching objective 'to help people make informed decisions about how much alcohol they choose to drink'² as it has been articulated in the Draft. This objective was further emphasised by Professor Kelso AO in a media statement released by the NHMRC regarding the Guidelines which stated that "We're not telling Australians how much to drink. We're providing advice about the health risks from drinking alcohol so that we can all make informed decisions in our daily lives".³ In Retail Drinks' view, the ability of the Guidelines to achieve this stated objective will be enhanced by maximising the extent to which consumer comprehension is incorporated as a guiding principle.

As a result of its broad and diverse membership of PLLs, including big, small and online retailers, Retail Drinks has been equipped with significant insights, data and knowledge with respect to consumer comprehension which it is pleased to share with the NHMRC as part of the Guidelines' development. The importance of consumer comprehension is particularly pronounced in the packaged liquor environment, where over 70 per cent of all alcohol purchases by Australian consumers occur.

Summary of Recommendations:

Retail Drinks' specific recommendations in relation to the Guidelines are as follows:

- I) Recommendation 1: In reflecting the Guidelines' objective to assist Australian consumers make more informed decisions regarding their alcohol consumption, Retail Drinks submits that the title be amended to *Australian Alcohol Guidelines: Health Risks and Benefits*, consistent with the 2001 Guidelines.
- II) Recommendation 2: Retail Drinks would recommend that the NHMRC adopt additional practical measures to ensure that the views and perspectives of consumers are reflected within the Guidelines, including incorporating direct consumer participation as part of this process. The measures adopted should be in accordance with the criteria as outlined in the NHMRC's published *Guidelines for Guidelines*.
- III) Recommendation 3: The wording of Guideline One be redrafted to reflect Australian consumers' existing understanding (supported by Table 1 in the modelling report) of the differing risk threshold between men's and women's alcohol consumption.

Each of Retail Drinks' recommendations have been formulated with the objective of enhancing Australian consumers' ability to make informed decisions regarding their alcohol consumption, consistent with that of the Guidelines. Given that Retail Drinks' expertise is most closely tied to consumer comprehension within the packaged liquor environment, this submission does not seek to provide any comment on substantive issues around the Guidelines unrelated to this topic.

² Ibid.

³ <https://www.nhmrc.gov.au/health-advice/alcohol>



Retail Drinks Recommendations

I) Recommendation 1: Name of Draft Guidelines

Retail Drinks notes that the title of the Draft Guidelines has been adopted from the previous 2009 iteration, *Australian Guidelines to Reduce Health Risks from Drinking Alcohol*. Retail Drinks however notes that the previous version of the Guidelines published in 2001 was titled *Australian Alcohol Guidelines: Health Risks and Benefits*.

In Retail Drinks' view, the title is an important aspect of communicating the overall message to Australian consumers around the Guidelines. As such, the title should be worded in such a way which enhances consumer comprehension, in turn leading to more informed decision-making around alcohol consumption in line with the Guidelines' stated objective. To achieve this, both the potential risks and benefits involved in consuming alcohol should be included in the title.

This would also reflect that the protective effects of alcohol have been considered in developing the Guidelines, and is supported by the large number of studies published confirming the J-shaped association between drinking and relative risk of premature death from all causes.

In light of this, Retail Drinks expresses a preference for the title of the Guidelines to be reworded to *Australian Alcohol Guidelines: Health Risks and Benefits*, in line with the 2001 Guidelines.

II) Recommendation 2: Improved Consumer Engagement in Guidelines' Development

In Retail Drinks' view, the efficacy of the Guidelines in achieving their overarching objective of helping people make informed decisions around alcohol consumption depends on their ability to resonate strongly with consumers and subsequently influence their behaviour and decision-making processes. If the Guidelines do not achieve this, then their aim of facilitating more informed decision-making around alcohol consumption is compromised. To minimise this possibility, Retail Drinks contends that consumer involvement and engagement should be made a key component in the development and finalisation of the Guidelines. Retail Drinks also notes that the NHMRC's own Guidelines for Guidelines state that '*Guidelines can only meet the needs of the population if they are developed with meaningful and authentic engagement with consumers*'.⁴ Retail Drinks is concerned that insufficient consumer engagement and comprehension testing has occurred.

In addition to the above statement, Retail Drinks also notes that the NHMRC's Guidelines for Guidelines provide clear direction on the requisite involvement for consumers throughout the Guideline development process. Retail Drinks believes that the criteria outlined within the Guidelines for Guidelines should be incorporated as closely as possible to maximise consumer engagement with the development process. The practical measures relevant to this process include:

⁴ NHMRC (2018) *Guidelines for Guidelines*, <https://www.nhmrc.gov.au/guidelinesforguidelines/plan/consumer-involvement>

- a) Expanding the membership of the Guideline development group to include additional consumer representatives;
- b) Ensuring that decisions about how and when consumers are engaged with are clearly documented in the final Guideline;
- c) Ensuring that decisions about the recruitment of consumers are well-documented and refer to clearly specified requirements based on the goals of each stage of development;
- d) Reporting consumer input into the Guideline itself to ensure that guidelines are transparent and can be evaluated by others at a later stage;
- e) Capturing an authentic consumer perspective within the Guidelines, including hearing multiple voices and lived experiences of communities affected by the Guidelines; and
- f) Incorporating consumer participation in the Guideline development phase and describing the processes employed to recruit, involve and support consumer participants.

III) Recommendation 3: Redrafting of Wording in Guideline One

Retail Drinks notes the wording of Guideline One as it has been presently articulated in the Draft Guidelines:

*'To reduce the risk of harm from alcohol-related disease or injury for healthy men and women, drink no more than 10 standard drinks per week and no more than 4 standard drinks on any one day.'*⁵

Retail Drinks is concerned that the current formulation of Guideline One will be ineffective in assisting Australian consumers make informed decisions regarding their alcohol consumption. This is due to the fact that Guideline One does not contain any reference to, or acknowledgement of, the differing levels of risk between men's and women's alcohol consumption, which is consistent with available international evidence.⁶

There is already a significant difference between Australian men and women's risk perceptions regarding their individual consumption of alcohol.⁷ Therefore, should the existing wording of Guideline One be adopted in the final version of the Guidelines, it may in fact cause confusion amongst consumers as its messaging may be in conflict with their existing comprehension. Such an outcome would be counter-productive in terms of educating consumers on responsible alcohol consumption and may dilute the impact and cut-through of the Guidelines' messaging. As such, Retail Drinks would recommend that the wording of Guideline One be amended to reflect the distinction in the risk threshold between men's and women's alcohol consumption.

It should be noted that Retail Drinks does not make any specific numeric recommendations regarding the number of standard drinks consumed per day or per week which Guideline One should be set at for either men or women, other than to say that it should be reflective of the available international

⁵ NHMRC (2019) *Draft Australian Guidelines to Reduce Health Risk from Drinking Alcohol*, p.20.

⁶ Angus, C., et al, The University of Sheffield (2019), *Mortality and morbidity risks from alcohol consumption in Australia: Analyses using an Australian adaptation of the Sheffield Alcohol Policy Model (v2.7) to inform the development of new alcohol guidelines*, August, p.5.

⁷ Australian Government (2017), Australian Institute of Health and Welfare (AIHW), *National Drug Strategy Household Survey 2016: Detailed findings*,

evidence. Rather, Retail Drinks' recommendation is to ensure that the differing level of risk between men's and women's alcohol consumption is recognised in the wording of Guideline One so that it is consistent with consumers' existing understanding of alcohol consumption. In doing so, this would maximise Guideline One's beneficial effect in educating Australian consumers and harmonise its messaging with consumers' existing understanding of alcohol consumption.

Other Recommendations - Introduction

The development of the Guidelines has involved a significant process of assessment, submissions and consultation over an extensive period of time.

It is clear that this is critical to a level of trust in the research and engagement with the public, and to maximise the effectiveness of the Guidelines for their stated goal.

There is some clarity required as to how these Guidelines, which have been referred to as "living", will affect future consultation. That is, if the Guidelines are proposed to be updated as evidence changes, clarity is needed as to how consultation and engagement with the scientific community, impacted stakeholders and the public, will occur.

Conclusion

Should there be any matters raised in this submission requiring any additional clarification or discussion, please contact Retail Drinks *[NHMRC has removed personal information]*.

Once again, Retail Drinks greatly appreciates the opportunity to provide a submission to the development of the Draft Guidelines and looks forward to the release of the final Guidelines in due course.

Sincerely

[NHMRC has removed personal information]