



Royal Australasian
College of Surgeons

**South Australian Consultation on the
Collection of Alcohol Sales Data**

October 2021

Introduction

Thank you for the opportunity to provide comment to this consultation. As the leading advocate for surgical standards, professionalism in surgery and surgical education in Australia and New Zealand, the Royal Australasian College of Surgeons (RACS) is committed to taking informed and principled positions on issues of public health at both state and federal levels.

RACS has advocated against the harmful effects of alcohol and illicit drugs over a number of years, not only for the increased risk of complication that they pose to surgical patients, but also for the broader ramifications they have on our public health system and society as a whole.

We welcome the South Australian Government's intention to introduce data collection. If implemented appropriately, and combined with other targeted policy measures, this initiative will greatly assist South Australia's attempts to reduce alcohol related harm.

The discussion paper highlights the 2016 Review of South Australia's Liquor Licensing Framework, which was conducted by Justice Tim Anderson. At the time of this review RACS provided a [submission](#), and a [joint-supplementary submission](#), which we co-authored with a number of likeminded organisations. We also provided verbal evidence to Justice Anderson at a hearing that the College was invited to.

As part of our advocacy and representations to this review, the College highlighted the importance of alcohol sales data as part of a broad range of policy measures. Below in an excerpt from the joint supplementary submission:

Collection and publication of alcohol sales data

Model for consideration

No jurisdiction can be identified as presenting an optimal model for alcohol sales data, as a range of inconsistencies present limitations with respect to the use of data and clear gaps exist in what each jurisdiction collects. The National Alcohol Sales Data Project, a joint initiative between the Western Australia Drug and Alcohol Office and the National Drug Research Institute at Curtin University, has highlighted the value of standardised collection and analysis of alcohol sales data. Research conducted by the Centre for Alcohol Policy Research provided the following recommendations for inclusion in a nationally consisted alcohol sales data collection:

- *Transaction-level data on sales from wholesalers and producers to retailers who sell alcohol to the public. This level of detail will allow for monthly, quarterly or annual estimates of sales as appropriate.*
- *Retail outlet-level data, with standard public reporting of the data limited to appropriate geographical units (such as postcode), leaving open the possibility that more detailed data can be utilised for specific policy-relevant purposes.*
- *Data on price and volume should be included for each transaction.*
- *Product variety should be recorded, including beer by strength, bottle and cask wines, spirits by type and cider.*

Rationale

South Australia is the only jurisdiction that doesn't collect wholesale sales data. Retail sales data (in terms of volume of pure alcohol sold) is valuable for risk-based licensing for online/direct and retail packaged liquor outlets. These data ensure that licensing fees and risk assessments are objectively tied to risks associated with their contribution to the availability of alcohol in an area.

It also facilitates the development and assessment of evidence-based policy to deliver harm reduction while minimising adverse impacts on business operations.

The College requests that our comments and recommendations from 2016 are taken into consideration as part of this review, as they remain relevant in today's policy context. More information on the National Alcohol Sales Data project is available through [the following link](#). This includes recent reports. As highlighted in these reports, there is no data available from South Australia. RACS believes that if the collection and publication of sales data were implemented in a manner consistent with the above model, South Australia could move from lagging behind other state's in this area to becoming a national leader.

In addition to the above comments, the College also makes the following observations and recommendations:

CBD data collection:

The 2016 Review of highlighted the high numbers of alcohol related assaults within the Adelaide CBD. This is unsurprising given the higher density and proportion of late-night venues, and that assaults are much more likely to occur later in the evening and into the early hours of the morning. Consequently, the College supports higher quality data collections within identified zones, such as the CBD.

An effective example is the collection of data within the Kings Cross precinct in Sydney's CBD. This involves licensees in the Kings Cross precinct being required to report the amount of liquor sold daily. Furthermore, venues deemed as high risk are mandated to report hourly sales in their quarterly report. While New South Wales does not collect alcohol sales data at a state level, their collection of alcohol sales data within the Kings Cross is widely regarded as the most comprehensive and effective data collection models in Australia.

RACS appreciates the difficulties in implementing this model at a state-wide level, however, we recommend that the South Australian Government consider replicating it within designated areas. We believe this would result in a much higher quality data collection, which would prove highly effective in guiding evidence-based policy.

Remove exemption criteria:

The 2016 Review also highlighted the growing number of smaller venues and wholesalers engaging in alcohol sales, and the expectation that this trend would continue to grow in future years. Given this, RACS does not support the exemption criteria proposed in the discussion paper for smaller wholesaler and producers based on lower volumes of alcohol sales. We are concerned that this model will compromise the quality and the integrity of the data by allowing large volumes of alcohol consumption to be missed.

RACS recommends that South Australia follow the lead of jurisdictions, such as the Northern Territory and Western Australia, who maintain effective data collection systems that do not involve these types of exemptions. We do not believe this would be overly burdensome on small businesses given that this data is kept for other purposes such as taxation reporting requirements.

Role of the Liquor and Gambling Commission

Compliance is essential in ensuring appropriate data collection. It is therefore imperative that the appropriate level of resources are provided to the Liquor and Gambling Commission to ensure that they are able to fulfil their role effectively.

This includes:

- Providing the Commission with powers under the Act to audit liquor suppliers' records to ensure that data provided is accurate.
- Providing the Commission with powers to enforce substantive penalties upon suppliers who do not provide comprehensive data within appropriate timeframes of being requested
- Allowing the Commission to conduct random audits on a specified percentage of respondents to ensure the accuracy of data

Additional data collections

RACS acknowledge that the collection and publication of alcohol related crime data is outside the scope of this review, however, we encourage the Government to consider this as an area of significance and one that both warrants further investigation and complements the current review.

The College was recently asked to provide [a submission](#) to the South Australian Liquor and Gambling Commissioner in response to a number of applications for packaged liquor sales licenses which had been received.

In our response we highlighted the lack of publicly available sales and crime data in South Australia as a major barrier to rigorous evidence-based policy. As an example, the South Australian Police (SAPOL) routinely publish rolling 12-month crime data on their website, which includes assaults committed by local area. Unfortunately, however, there is no routine collection, or at least no regularly published data, regarding the involvement of alcohol in criminal offending as there is in other jurisdictions (such as New South Wales).

The lack of consistently available data at a local level in South Australia makes it difficult for public health advocates and community representatives to provide specific predictions about the social costs of individual outlets. These groups are often under resourced (particularly in comparison to the large conglomerates submitting the applications) and are confronted simultaneously with multiple applications spread across wide ranging local areas.

As a result, the obligations placed upon those objecting to individual applications commonly set an unattainably high bar in individual licensing cases, which has been cited as a reason for why many applications that are not in the public interest are ultimately successful.

Closing the loophole on alcohol sales data is imperative, and we congratulate the South Australian Government for pursuing this. However, we are hopeful that this is only the first step in a broader range of measures, aimed at ensuring ongoing compliance with the harm minimisation principles outlined in the state's Liquor Licensing Act.