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To whom it may concern

## SUBMISSION TO THE CONSULTATION DRAFT NATIONAL ALCOHOL STRATEGY 2018-2026

Thank you for the opportunity to provide a submission to the *Consultation Draft National Alcohol Strategy* 2018-2026.

The Australian Injury Prevention Network is the peak body in Australia representing researchers and practitioners in injury prevention. We would like to offer our support to the submission prepared by the National Alliance for Action on Alcohol (NAAA) and the Foundation for Alcohol Research and Education (FARE).

The Australian Injury Prevention Network is pleased to see that after seven years without a National Alcohol Strategy, the Ministerial Drug and Alcohol Forum (MDAF) has released the Consultation Draft for public consultation. It is also excellent to see that the Consultation Draft has incorporated feedback from the public health and community sectors, that the Draft largely aligns with a number of international strategies, and includes evidence-based measures that have been proven to be effective in preventing and minimising alcohol harm.

However a strategy is only as effective as its implementation. While the Consultation Draft provides a good summary of the evidence and outlines evidence-based 'opportunities for action', it lacks detail on implementation. Without clear priorities, funding commitments, timeframes and accountability mechanisms, a new National Alcohol Strategy will not achieve change.

To transform the Consultation Draft into a strategy that will achieve change, the Australian Injury Prevention Network recommends incorporation of the following three priorities in any future National Alcohol Strategy.

1. Adapt the National Road Safety Strategy 2011-2020 frame as a model for the new National Alcohol Strategy.

Adaptation of the National Road Safety Strategy 2011-2020 framework as a model for a new National Alcohol Strategy would provide a proven framework to underpin change. Given Australia's overall success in improving road safety over time, it seems relevant to learn from Australia's strategic approach in this area. A new National Alcohol Strategy must contain an ambitious overarching target, include mechanisms that facilitate shared responsibility and leadership for action, outline priority actions for implementation within specific timeframes, and enable independent and transparent policymaking processes. Given our mandate, Members of our organisation have been involved in drafting of the National Road Safety Strategy 2011-2020 and we would be pleased to provide further input.

## 2. Adopt a system of strong accountability measures to monitor progress.

Adopt strong accountability measures to monitor progress. The MDAF must commit to resourcing and rebuilding Australia's monitoring system for alcohol across the course of the strategy. An effective monitoring system needs to set targets that specify reductions in alcohol harm as well as patterns and levels of alcohol consumption. As an initial step in this process, we recommend adoption of measures, indicators and targets that align with the Australian Health Policy Collaboration's Health Tracker 2025 proposed measures, indicators and targets for alcohol.<sup>1,ii</sup>

## 3. Prioritise and commit to implementing specific, evidence-based activities in three year segments.

Prioritise and commit to implementing specific, evidence-based activities in the three year segments of a new National Alcohol Strategy. To transform the Consultation Draft from a 'recipe book' of measures to a results-focused strategy with clear commitments to action, we recommend that relevant governments, departments and agencies commit to implementing the specific 'actions' outlined in NAAA's and FARE's submission, by 2021. These could be done by producing targeted priority areas in three-year Action Plans that clearly specify targets, plans to implement change and measures to indicate success. Each successive 'Action Plan' should report on progress toward the priority areas of the previous Action Plan and identify new priorities, plans and measures of success. Priority should be given to implementing prevention-focused actions, and those assessed by the evidence as being most effective in reducing alcohol harm.

The Australian Injury Prevention Network members work across all areas of intentional and unintentional injury and recognise the cross-cutting nature of alcohol-related harms. Injury is the leading cause of death and disability in Australians under 45 years of age, and alcohol has been implicated as a risk factor in almost all forms of injury, including injuries as diverse as unintentional falls, burns, road traffic deaths, drowning, assault, suicide. We believe that this Alcohol strategy has the potential to significantly reduce injury in the Australian community if adopted and implemented with solid commitment from government at national, state and local levels.

As outlined in the Consultation Draft, the harms associated with alcohol are significant, with too many individuals, families and communities continuing to be impacted by alcohol. The good news, however, is that much of this harm can be prevented with strong political leadership, a commitment to action, an effective strategy and implementation of initiatives that have been proven to work.

This process provides a unique opportunity to develop and implement a strategy that will prevent and minimise alcohol harm. To achieve this, the Australian Injury Prevention Network urges the MDAF to consider and adopt the recommendations outlined in this submission.

Thank you once again for the opportunity to raise these important issues with you.

Yours sincerely

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<sup>&</sup>lt;sup>1</sup> Tolhurst, P., Lindberg, R., Calder, R., Dunbar, J., de Courten, M. (2016). *Australia's Health Tracker*. Retrieved from <a href="https://www.vu.edu.au/sites/default/files/australias-health-tracker-overview">https://www.vu.edu.au/sites/default/files/australias-health-tracker-overview</a> 1.pdf

ii Tolhurst, P., Lindberg, R., Calder, R., Dunbar, J., de Courten, M. (2016). *Australia's Health Tracker*. Retrieved from <a href="https://www.vu.edu.au/sites/default/files/australias-health-tracker-overview 1.pdf">https://www.vu.edu.au/sites/default/files/australias-health-tracker-overview 1.pdf</a>