



Online sale and home
delivery of alcohol:
measures to prevent
harm in Victorian
communities

1 October 2020

 **Alcohol
Change
Vic** 

Victorians for
policy reform

Online sale and home delivery of alcohol: measures to prevent harm in Victorian communities

Alcohol Change Vic is a collaboration of health and allied agencies that share concerns about the harmful impacts of the alcohol industry and its products in Victoria. Alcohol Change Vic campaigns for policy change to protect the community from the harm the alcohol industry causes, and to provide balance to the industry's aggressive marketing and normalisation of alcoholic products.

The members of Alcohol Change Vic are:

- Australasian College for Emergency Medicine
- Alcohol and Drug Foundation
- Cancer Council Victoria
- Centre for Alcohol Policy Research (CAPR), La Trobe University
- Foundation for Alcohol Research and Education
- Public Health Association of Australia (Victoria)
- Royal Australasian College of Surgeons
- St Vincent's Health Australia
- The Salvation Army
- Turning Point
- Victorian Alcohol and Drug Association
- Violence Prevention Group, School of Psychology, Deakin University
- Uniting Church in Australia, Synod of Victoria and Tasmania

Executive summary

Individuals, families and communities should be supported to be healthy and safe. The rapid expansion of online sales and home delivery of alcohol in Victoria is placing children and other vulnerable people in our communities at risk of harm.

Big alcohol companies are heavily promoting rapid alcohol home delivery and daily alcohol use at home during the COVID-19 pandemic to help people cope. Alcohol use makes people more vulnerable to COVID-19, exacerbates negative impacts of social isolation, and may fuel violence in people's homes.

Home deliveries of alcohol fuel harm to vulnerable people. Research has found that on-demand alcohol delivery services are used regularly by high-risk drinkers, and enable people who are already intoxicated to keep drinking. People who use these services are more likely to experience or cause alcohol-fuelled harm than other people.

Online sales and home deliveries of alcohol products are placing Victorian children at risk of harm. There is no requirement for alcohol companies to verify the age of people buying alcohol online. Research has found that alcohol delivery companies often do not check ID, or leave orders with someone else or unattended.

Summary of recommendations

Alcohol Change Vic is calling for the Victorian Government to introduce the following common-sense measures to prevent harm from online sale and home delivery of alcohol:

1. Prevent alcohol orders being home delivered to people who are already intoxicated.
2. Require alcohol companies to verify the age of people they sell alcohol to online.
3. Require alcohol companies or delivery agents to check ID on delivery, and prevent them leaving alcohol orders with someone else or unattended.
4. Require alcohol companies to observe a minimum two-hour delay before delivering alcohol orders.
5. Prevent alcohol deliveries between 10pm and 10am.
6. Prevent alcohol companies using 'buy now pay later' services and inducements to sell alcohol online.
7. Require businesses to apply for a specific liquor licence condition before they can deliver alcohol, which requires them to show that the alcohol delivery will not detract from the safety and wellbeing of the community.
8. Remove the 'limited licence' category for alcohol home delivery.
9. Ensure the Victorian Commission for Gambling and Liquor Regulation (VCGLR) ends the fast-tracking of temporary licences for alcohol home delivery during the COVID-19 state of emergency, and there is no continuing expansion of licences for home delivery.
10. Require interstate alcohol companies that deliver alcohol on demand in Victoria to have a Victorian liquor licence.

The alcohol industry has rapidly expanded online sales and home delivery

It's never been more important to support individuals, families and their communities to be healthy and safe. However, the rapid expansion of online sales and delivery of alcohol to people's homes has made alcohol products more accessible than ever before, and is placing children and other vulnerable people in our communities at risk of harm.

In recent years prior to the COVID-19 pandemic, big alcohol retailers have dramatically increased their capacity to sell alcohol products online and deliver alcohol directly to people's homes.

Many big retailers, including Woolworths-owned BWS and Dan Murphy's, now deliver alcohol on-demand to people's homes in two hours or less. Rapid alcohol delivery companies, such as Tipple and Woolworths-owned Jimmy Brings, promote delivery of alcohol to people's homes in as little as 30 minutes, enabling people to buy alcohol impulsively and to keep drinking with little interruption when their alcohol supplies have run out.

Amazon has recently been granted a Victorian liquor licence to deliver alcohol products to people's homes, along with everyday items, such as books, toys, toasters and hairdryers.

Prior to the pandemic, it was forecast that the retail alcohol industry would continue to rapidly increase its revenue from further expansion of online alcohol sales, delivery and pick up over the next five years.ⁱ

Jimmy Brings website www.jimmybrings.com.au

"Once your order is in, you can expect it at your doorstep in just 30 minutes, which means the party doesn't have the chance to slow down before the next round."

"You'll never have to worry about staying sober to drive to the store for reinforcements or watching your night taper off because of a disappointing lack of booze. With Jimmy Brings, you can rely on alcohol delivery straight to your door."

"Right now your cart is empty; hope your friends like water"

"Need to recharge? This quickie will do the trick".ⁱⁱ

Big alcohol retailers are pushing delivery to people's homes during COVID-19

Currently, big alcohol corporations are profiting from the COVID-19 pandemic by pushing alcohol delivery and use at home by vulnerable people in isolation. Online alcohol sales, including home delivery and 'click and collect' orders, increased sharply during the first COVID-19 restrictions as big alcohol retailers aggressively expanded their capacity to sell alcohol online.ⁱⁱⁱ This included large spikes in online sales for Woolworths-owned BWS and Dan Murphy's, which had 200 per cent and 43 per cent increases in sales (respectively) during the first week of restrictions.^{iv}

Alcohol companies have been relentlessly promoting rapid delivery services and daily drinking at home on social media, and bombarding people with targeted social media advertisements. A recent study of alcohol marketing in Australia during the COVID-19 outbreak found that sponsored alcohol marketing posts appeared on Facebook and Instagram feeds every 35 seconds, promoting easy access to alcohol without leaving the home, as well as buying more alcohol, and using alcohol at home to cope, survive or feel better.^v

This is placing people in our communities at increased risk during the COVID-19 pandemic. Alcohol use, especially heavy drinking, makes people more vulnerable to COVID-19. This is because alcohol weakens people's immune systems and increases their risk of respiratory failure, one of the most serious COVID-19 complications.^{vi} Alcohol use also worsens negative impacts of social isolation, and financial and social stresses associated with COVID-19, by exacerbating mental health problems such as anxiety and depression, and fuelling family violence, abuse and neglect in Victorian homes.^{vii,viii,ix} Victoria Police reported an increase of almost seven per cent in family violence offending during the first COVID-19 restrictions compared to the same time in 2019.^x

Alcohol home deliveries fuel harm to vulnerable people

We know that alcohol delivery services are most used by the highest risk drinkers, placing these vulnerable people at greater risk of harm, and placing other people in the home at risk of alcohol-fuelled assaults and violence. Alcohol use is associated with an increase in the frequency and severity of family violence, and is involved in a significant proportion of family violence incidents in Victoria. At least one in five to as many as half of all family violence incidents in Victoria are fuelled by alcohol use.^{xi, xii}

Alcohol delivery companies heavily promote rapid on-demand delivery, often in 30 minutes or less, and urge people to order alcohol on demand so they don't have to stop drinking. They also encourage people to buy alcohol impulsively and in large quantities. For example, Woolworths-owned Jimmy Brings deliberately targets parties, offering large amounts of alcohol through 'party starter' bundles, 'weekender packs' and 'big night in' bundles with large discounts, and using phrases like:

"Once your order is in, you can expect it at your doorstep in just 30 minutes, which means the party doesn't have the chance to slow down before the next round."

A 2020 VicHealth study of on-demand alcohol delivery service use by Victorians (undertaken prior to COVID-19 restrictions) found that these services are used regularly by high-risk drinkers, they enable people who are already intoxicated to keep drinking, and people who use the services are more likely to experience or cause alcohol-fuelled harm than other people.^{xiii}

The survey found that almost a quarter (23 per cent) of Victorians who reported using on-demand alcohol delivery services, and nearly three quarters of people who use these services weekly, were very risky drinkers, consuming 11 or more alcoholic drinks in a session at least once a week.

Forty per cent of people who used an alcohol delivery service weekly said they would have stopped drinking if the delivery service was not available. More than 20 per cent of weekly users of alcohol delivery services (other than Airtasker) regularly receive their alcohol orders despite already being intoxicated.

Just under half of people who use on-demand alcohol delivery services reported being unable to remember what they had been doing when drinking (compared with 24 per cent of people who do not use these services), while 88 per cent of people who use on-demand services weekly had experienced memory loss from alcohol use. Many of the people who experienced memory loss from alcohol use had bought the alcohol from an on-demand service the last time this happened – over a third (36 per cent) of people who use on-demand services, and more than half (57 per cent) of people who use on-demand services weekly.

One in 10 (11 per cent) people who use on-demand services had been injured, or had injured someone else, due to their drinking at least once during the last 12 months (compared to one per cent of people who do not use on-demand services). For nearly half of these people, they were drinking alcohol supplied by an on-demand alcohol delivery service the last time this happened. For weekly users of on-demand alcohol delivery services, more than three quarters were drinking alcohol from one of these services the last time this happened.

A 2020 survey of Australians by the Foundation for Alcohol Research and Education (FARE) (undertaken prior to COVID-19 restrictions) also found that people who use rapid alcohol delivery services are more likely to drink at high risk levels. The majority (70 per cent) of people who reporting receiving an alcohol delivery within two hours of their order reported consuming more than four standard drinks on the day of the delivery. Of those people, more than a third (38 per cent) consumed 11 more standard drinks.^{xiv}

Online sale and home delivery of alcohol is placing children at risk

We all want our children to be healthy and safe. It is encouraging that fewer children and young people are using alcohol than in the past. However, too many children still drink. A 2017 survey reported that nearly half (46 per cent) of Australian children aged 12-17 years had used alcohol in the past year, more than a quarter (27 per cent) of children had used alcohol in the past month and 15 per cent had used alcohol in the past week. Forty-one per cent of 12-17-year-old children had drunk five or more drinks on one day in the past year, and 23 per cent of children had drunk this amount of alcohol on one day in the past month.^{xv}

Children are extremely vulnerable to harm from alcohol. Alcohol use interferes with children's brain development, fuels risk-taking behaviour and causes accidental deaths.^{xvi}

We all agree that children younger than 18 years should be protected by ensuring that alcohol products are not sold to them. Just as controls are in place to ensure alcohol products are not supplied to children in bricks and mortar alcohol

stores, there should be controls to ensure that alcohol products are not sold to children online or delivered in a way that allows children to access them. A 2020 FARE survey found that an overwhelming 88 per cent of Australians believe that proof of age should be verified when purchasing alcohol products.^{xvii}

Worryingly, the current lack of regulation of online sale and home delivery of alcohol products is placing children at risk of harm. There is no requirement for alcohol companies to verify people's age when they buy alcohol online. Companies generally ask people to enter their date of birth without any verification process, making it easy for children to buy alcohol online.

We know that people delivering alcohol often do not check ID. Three recent Victorian and Australian studies have found that alcohol delivery companies or delivery agents often do not check ID, leave deliveries with someone other than the person who ordered the alcohol, or leave deliveries unattended.

2020 VicHealth survey

The 2020 VicHealth survey found that one-third of Victorians surveyed who used on-demand alcohol services received an order without their ID being checked. This included a quarter of people aged 18-24 who did not have their ID checked. Fifteen per cent of people surveyed had deliveries accepted by someone else, and 10 per cent had deliveries left unattended.

After accounting for Airtasker use, 31 per cent still reported that they had received an order without their ID being checked, 10 per cent had their order collected by someone else and six per cent had their order left unattended.^{xviii}

2020 FARE survey

The 2020 FARE survey found that one-third of Australians surveyed reporting that their ID was not checked when they received alcohol home deliveries in the past 12 months. One in four respondents reported that their order was left unattended, and just under one in five (18 per cent) reported that their order was received by someone else.^{xix}

2019 Centre for Alcohol Policy Research survey

In 2019 the Centre for Alcohol Policy Research surveyed Australian adults who had purchased alcohol online in the past month, and found that 12 per cent did not have their ID checked when receiving their last order, with more than one-third of young people aged 25 years or younger reporting that they did not have their ID checked. Nearly one quarter (24 per cent) of people did not personally receive their order, as it was accepted by someone else or left unattended.^{xx}

Measures to prevent harm from online sale and home delivery of alcohol

Now more than ever, effective alcohol policies are needed to keep individuals, families and communities in Victoria safe and well. Victorian alcohol laws have not kept pace with the recent explosion in online sale and home delivery of alcohol. Current laws are designed to regulate alcohol sales directly to people on premises, and online sale and delivery is still largely an unregulated space. This is allowing online alcohol companies to sell and deliver alcohol to people without the same safeguards that apply in bricks and mortar stores.

We need sensible measures to close this gap and protect children and other vulnerable people from harm from online sales and home delivery of alcohol products.

Alcohol Change Vic is calling for the Victorian Government to introduce the following common-sense changes to the Victorian *Liquor Control Reform Act 1998* (Liquor Act).

1. Prevent alcohol orders being delivered to people who are already intoxicated

Alcohol companies should not be allowed to supply more alcohol to a person who is already intoxicated. This is an important, common sense measure to prevent harm. We know that the more intoxicated a person is, the more likely they are to harm themselves or others. This is why the Victorian Liquor Act prohibits alcohol outlets supplying alcohol on-premises to people who are already intoxicated.

On-demand alcohol deliveries to people who are already intoxicated enables them to keep drinking at high risk levels. This causes harm to the people drinking, and may also fuel harm and violence to other people at home. Currently there is no legal restriction in Victoria to prevent alcohol being home delivered to a person who is already intoxicated, and we know from recent research that a significant proportion of people are intoxicated when they receive alcohol deliveries.^{xxi}

Recommendation

Alcohol businesses or delivery agents should be prevented from delivering alcohol to people who are intoxicated.

2. Require alcohol companies to verify the age of people they sell alcohol to online

Measures are needed to prevent children from buying alcohol online. Online alcohol retailers should be required to verify age at the point of online alcohol purchase using an effective method that prevents children being able to falsely claim to be 18. This could involve requiring customers to set up a password-protected account which they then use for online alcohol purchases. Photo ID scanning and live photo comparison should be required to set up the account.

Recommendation

Online alcohol retailers selling alcohol to people in Victoria should be required to verify age at the point of sale, using an effective verification method (such as ID scanning and live photo comparison on set up of a password-protected account).

3. Require alcohol companies or delivery agents to check ID on delivery, and prevent them from leaving deliveries with another person or unattended

Allowing alcohol orders to be received by someone else, or left unattended at the delivery address, provides easy avenues for children or people who are intoxicated to access alcohol.

Requiring alcohol orders to be received and signed for by the person who placed the order is a straightforward, common sense measure to prevent harm to children and people who are intoxicated. This would prevent a person 18 years or older receiving an alcohol order on behalf of a child, or someone who is not intoxicated receiving an alcohol order on behalf of an intoxicated person. It would also prevent children and intoxicated people accessing unattended alcohol deliveries. It is commonplace for companies delivering benign, ordinary items (such as toys and clothes) to require deliveries to be signed for by the recipient or picked up at a collection point with proof of identity if they are not home when delivery is attempted.

There should be a requirement for photo proof of age to be checked on delivery or pick up of alcohol in all cases.¹ This is also a simple and important measure to ensure alcohol is not delivered to children. This would avoid relying on the delivery person to make a judgment of age (as they must under some alcohol retailers' policies of checking ID only where the recipient appears to be younger than 25) and would better enable and simplify enforcement.

Recommendation

Alcohol businesses should be required to ensure that alcohol orders are delivered to, or picked up at a collection point by, the person who placed the order. The alcohol business, delivery agent or collection point should also be required to check evidence of age and obtain the signature of the person receiving or picking up the alcohol order, and should be prohibited from supplying alcohol to a person who is intoxicated.

4. Prevent rapid alcohol deliveries

Alcohol companies delivering alcohol products to people's homes in short timeframes is likely to cause harm to vulnerable people. Rapid alcohol deliveries allow people to buy alcoholic products on impulse and to keep using alcohol when supplies have run out, and enable people who are already intoxicated to quickly access more alcohol without having to leave their home.

Requiring alcohol companies to observe a delay of at least two hours between the time when an alcohol order is placed and the time the alcohol is delivered would significantly reduce the risk of harm to people using alcohol at home.

Recommendation

Alcohol retailers (packaged liquor, general and limited licence holders) should be prohibited from delivering alcohol until at least two hours after the alcohol order was placed.

5. Prevent late night alcohol deliveries

Delivery of alcohol to people's homes late at night is likely to fuel violence and other harm. We know that alcohol is more likely to fuel assaults at night, with alcohol-related assaults increasing substantially between 6pm and 3am.^{xxi} Other alcohol-fuelled harms, including suicide and sudden deaths, also occur most often in the home at night.^{xxii}

There is good evidence from overseas that restricting the trading hours of take away alcohol outlets significantly reduces harm. Studies in Switzerland found that there significant reductions in hospital admission rates in parts of the country that

¹ Currently, it is an offence under section 119A of the *Liquor Control Reform Act 1998* (Vic) to deliver alcohol to a child younger than 18. It is a defence to section 119A if the delivery person saw evidence of age indicating that the recipient was 18 years or older. However, there is no requirement to check evidence of age.

limited take away sales of alcohol to 9pm or earlier.^{xxiv} A German-based study found that preventing the sale of alcohol from take away outlets between 10pm and 5am reduced alcohol-related hospitalisations among adolescents and young adults by about 9 per cent.^{xxv}

Just as the trading hours of bricks and mortar alcohol stores and venues are restricted to prevent harm, controls are needed to ensure that alcohol companies do not deliver alcohol to people's homes late at night.

Recommendation

Alcohol deliveries should be prohibited between 10pm and 10am. This should be in addition to requiring alcohol retailers (packaged liquor, general and limited licence holders) to observe a minimum two-hour delay between the alcohol order and delivery, so that alcohol orders must be placed by 8pm.

6. Prevent alcohol companies using 'buy now pay later' services and inducements to sell alcohol online

Online alcohol companies, including rapid delivery companies, encourage people to use 'buy now pay later' services to buy alcohol products online. This is likely to fuel harm to vulnerable people in our communities by encouraging people to buy alcohol products impulsively, and removing cost barriers that might otherwise prevent people buying alcohol frequently or in large quantities.

Online alcohol retailers also target people through direct electronic advertising, including through direct prompts via smart phone apps and SMS messages, and offer inducements such as time-limited discount codes that are likely to encourage impulsive purchases of alcohol.

Alcohol is not an ordinary commodity and alcohol companies should not be allowed to use 'buy now pay later' services and inducements to encourage people to buy alcohol products impulsively.

Recommendations

Alcohol companies should be prohibited from enabling use of 'buy now pay later' services to buy alcoholic products online in Victoria.

Alcohol companies should also be prohibited from offering inducements to encourage people to buy alcoholic products online in Victoria. An inducement should be defined as an offer or benefit conditional upon the purchase of alcohol, such as a voucher, product give away or discount code. This should include promotions that require the purchase of a minimum amount of alcohol or a minimum spend on alcohol to receive a discount.

7. Ensure better scrutiny and oversight of alcohol home delivery in local communities

New Victorian liquor licences, including new licences allowing alcohol delivery, are not effectively scrutinised before they are issued to ensure they will not have negative impacts and fuel harm in local communities. Decisions about whether to grant new licences are heavily weighted in favour of alcohol companies, and local governments and community members have little say in the process.

Existing liquor licence holders can start delivering alcohol without having to notify the VCGLR (the Victorian liquor regulator), provided they are already authorised to supply packaged alcohol under their licence. In addition, 'limited licences' are generally issued for online alcohol sale and delivery companies on the basis that this is a 'limited' mode of alcohol supply, despite the high risk of harm and the fact that there are almost no limits on how alcohol can be sold or delivered. Online alcohol sale and delivery companies are not required to obtain planning permits for limited licences, and local councils do not have to be notified of limited licence applications under current provisions of the Liquor Act. This means there is no control or oversight of alcohol delivery, and local councils do not have a say and cannot keep track of alcohol delivery companies supplying alcohol in their communities.

Even before the pandemic, there were already too many limited licences in Victoria, which had grown to make up a quarter of all liquor licences.^{xxvi}

During the COVID-19 state of emergency, temporary limited licences for online sales and delivery of alcohol have been granted within 24 hours, with no fees and without harm or social impact being effectively considered.

Recommendations

The VCGLR and local governments should have oversight of alcohol delivery in Victorian communities. New licences that allow alcohol delivery, or proposals by existing licence holders to start delivering alcohol, should be effectively scrutinised to ensure they will not contribute to harm, and to allow decisions about these licences to be considered in the context of existing alcohol outlets and levels of harm in communities.

To enable this and on the basis that alcohol home delivery is a high-risk mode of alcohol supply, new and existing Victorian liquor licence holders that wish to deliver alcohol should be required to apply for a specific licence condition authorising alcohol delivery in proposed delivery areas.

To be granted an alcohol delivery licence condition, applicants should have to show that the alcohol delivery will not detract from the safety and wellbeing of the community, including by undertaking a community impact assessment. Licence conditions that authorise same day alcohol delivery should be regarded as high-risk, requiring applicants to consult with the local community. Local governments and community members should have the right to object to all alcohol delivery licence condition applications.

In addition, the 'limited licence' category of liquor licences should be removed altogether, and online and delivery alcohol companies should have to apply for a packaged liquor licence with an alcohol delivery condition.

Alcohol Change Vic is also calling for the VCGLR to end the granting and fast-tracking of temporary limited licences for online alcohol sales and alcohol delivery during the COVID-19 state of emergency. The VCGLR and the Victorian Government should not allow COVID-19 to lead to any continuing expansion of the granting of licences for alcohol delivery.

7. Ensure interstate companies delivering alcohol on demand in Victoria have a Victorian licence

It is common sense that all alcohol companies delivering alcohol on demand to Victorians should have a Victorian liquor licence, irrespective of where they are located. This is necessary to ensure that these companies are subject to Victorian controls and safeguards to minimise the harm fuelled by alcohol delivery in Victorian communities. Bricks and mortar alcohol outlets that supply alcohol to Victorians are required to have a Victorian liquor licence and are subject to important safeguards to minimise the harm fuelled by the supply of alcohol to the Victorian community. Interstate alcohol delivery companies that deliver alcohol on-demand to Victorians pose a very high risk of harm to the community, and should also be subject to Victorian controls. The requirement for an interstate alcohol company to have a Victorian liquor licence should apply to any company that delivers alcohol in Victoria within 24 hours of when the order is received.

Recommendation

Interstate alcohol businesses that deliver alcohol in Victoria within 24 hours of receiving the alcohol order should be required to have a Victorian liquor licence.

ⁱ IBISWorld, Online Beer, Wine and Liquor Sales in Australia (March 2020).

ⁱⁱ Jimmy Brings website, <https://jimmybrings.com.au/menu>, accessed 24 August 2020.

ⁱⁱⁱ Jackson D, 2020, Liquor Legends adapts to online demand, *The Shout. National Liquor News*, 30 April 2020. <https://www.theshout.com.au/national-liquor-news/liquor-legends-adapts-to-online-demand/>.

^{iv} Woolworths Group, Third Quarter Sales Results, Financial Year 2020, https://www.woolworthsgroup.com.au/content/Document/Q3'20%20Sales%20Announcement_FINAL.pdf.

^v Foundation for Alcohol Research and Education & Cancer Council WA 2020, *An alcohol ad every 35 seconds. A snapshot of how the alcohol industry is using a global pandemic as a marketing opportunity*. <https://fare.org.au/wp-content/uploads/2020-05-08-CCWA-FARE-An-alcohol-ad-every-35-seconds-A-snapshot-final.pdf>.

^{vi} World Health Organization 2020, *Alcohol and COVID-19: what you need to know*, http://www.euro.who.int/__data/assets/pdf_file/0010/437608/Alcohol-and-COVID-19-what-you-need-to-know.pdf?ua=1.

^{vii} World Health Organization 2006, *Intimate partner violence and alcohol fact sheet*, http://www.who.int/violence_injury_prevention/violence/world_report/factsheets/fs_child.pdf.

^{viii} Council of Australian Governments 2011, *National plan to reduce violence against women and their children*, pp. 15, 21.

^{ix} State of Victoria 2016, Royal Commission into Family Violence, Summary and recommendations, p. 28.

^x Sakkal P, 2020, "Alarming": Family violence up 7% in Victoria, *The Age*, 8 May 2020.

^{xi} Sutherland P, McDonald C & Millsted M 2016, Family violence, alcohol consumption and the likelihood of criminal offences, Crime Statistics Agency (Vic).

^{xii} Miller P, Cox E, Costa B, Mayshak R, Walker A, Hyder S, & Day A 2016, Alcohol/drug-involved family violence in Australia, National Drug Law Enforcement Research Fund.

^{xiii} VicHealth 2020, On-demand alcohol delivery services and risky drinking. <https://www.vichealth.vic.gov.au/media-and-resources/publications/alcohol-delivery-risky-drinking>.

^{xiv} Foundation for Alcohol Research and Education 2020, *2020 Annual Alcohol Poll. Attitudes and Behaviours*. <https://fare.org.au/wp-content/uploads/ALCPOLL-2020.pdf>.

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