



Online sale and delivery of alcohol – A growing risk to our community

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Foundation for Alcohol
Research & Education



About FARE

The Foundation for Alcohol Research and Education (FARE) is the leading not-for-profit organisation working towards an Australia free from alcohol harms.

We approach this through developing evidence-informed policy, enabling people-powered advocacy and delivering health promotion programs.

Working with local communities, values-aligned organisations, health professionals and researchers across the country, we strive to improve the health and wellbeing of everyone in Australia.

To learn more about us and our work visit www.fare.org.au.

You can get in touch via email at info@fare.org.au.

FARE is a registered charity, and every dollar you give helps fund projects keeping our communities healthy and safe. You can make a tax-deductible donation at: www.fare.org.au/donate.

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Executive summary

The sale of alcohol online, along with targeted digital marketing where most ads are also the point of sale with 'buy now' buttons, means that **every phone has become a bottle shop**.

Everyone should have the opportunity to be healthy, safe and free from the harms that alcohol causes to families and communities. At the moment, alcohol causes harm to far too many Australians through contributing to chronic diseases, family violence, self-harm and suicide. Alcohol harm is exacerbated by the online sale and delivery of alcohol, which has vastly increased availability and accessibility, creating unique risks to community health and safety.

Most of Australia's regulatory environment for the sale of alcohol was designed for brick-and-mortar stores. The checks and balances that the community expects to be in place, such as age verification, responsible service of alcohol and community consultation and engagement on new liquor licences, are largely non-existent when it comes to the online sale and delivery of alcohol.

We reviewed the current state of the online sale and delivery of alcohol in Australia and found:

- Alcohol companies have ineffective processes to ensure alcohol is not sold online or delivered to people who are intoxicated or to children, with research showing that companies and retailers are delivering alcohol to people who are intoxicated and to young people without adequate identification checks.
- Alcohol companies are advertising their products using discounts and bulk buy options for purchasing alcohol online, which encourages higher risk alcohol use.
- Online alcohol retail in Australia is dominated by two major companies – Endeavour Group and Coles. Together they comprise 60 per cent of online alcohol revenue.
- Online alcohol retail sales have almost quadrupled from 2012 (\$539 million) to 2022 (\$2.0 billion). The revenue from online alcohol sales is forecasted to grow at an annual rate of 10.6 per cent by 2026–27.
- In 2020, one in 10 Australians who bought takeaway alcohol purchased it online – a threefold increase from 2019. It is estimated that one in six Australians who drink alcohol purchased it via delivery.
- Research shows that when companies deliver alcohol rapidly within two hours, it is associated with riskier levels of drinking. For example, a 2020 FARE survey found that 70 per cent of Australians who had alcohol rapidly delivered to them had more than 4 standard drinks that day, and 38 per cent had more than 10 standard drinks.
- Currently South Australia, New South Wales, Victoria and Western Australia have introduced detailed legislation that specifically aims to address some of the risks and harms from online alcohol sale and delivery. But these laws do not go far enough to protect the community.
- Evidence-based policies are required to prevent harms from online sale and delivery of alcohol. This will prevent harmful practices by alcohol companies affecting the health and wellbeing of our community.

Online sale and delivery of alcohol exacerbates harm in our community

An Australian dies every 90 minutes and another is hospitalised every three and a half minutes because of alcohol.¹

Alcoholic products cause harm to far too many Australians. Alcohol causes more than 200 diseases and injuries and leads to preventable hospitalisations and deaths.² Concerningly, alcohol harm continues to increase, with alcohol-induced deaths at the highest reported rate in 10 years³ and deaths from alcohol-related injuries having more than doubled over the past 10 years.⁴ There were 1,946 alcohol-related injury deaths in 2019–20, accounting for one in seven deaths from injury. Alcohol was the leading cause of 30,000 hospitalisations involving falls, intentional self-harm and assault.⁵ Alcohol was involved in one in four hospitalisations for self-harm and one in five hospitalisations due to assault.

The online sale and delivery of alcohol exacerbates harms and poses new risks for community health and safety. Significant evidence shows that the increased availability and accessibility of alcohol through online sale and delivery increases rates of harm. The sale of alcohol online, along with targeted digital marketing where most ads are also the point of sale with 'buy now' buttons, means that every phone has become a bottle shop.

Australian studies show that online sale and delivery of alcohol into the home increases the risk of alcohol being sold to children and people who are intoxicated, creates challenges for people managing alcohol dependency, and increases rates of high risk drinking.

This section is an overview of significant Australian studies over the last five years that have investigated the risks and harms to the community from companies selling alcohol online.



Online sale and rapid alcohol delivery into the home increases high risk alcohol use and harm

Five studies identified that online sale and rapid alcohol delivery increases high risk alcohol use and contributes to harms to oneself and others.

- A 2019 survey of 528 Australians aged 18 to 69⁶ showed that of those who were sold alcohol via rapid alcohol delivery (16 per cent), more than half had five or more standard drinks in a single occasion and over half (60 per cent) had more than 11 standard drinks at least once a month.
- A 2020 poll of 2,264 respondents⁷ found that 70 per cent of people who were delivered alcohol in under two hours (44 per cent of those surveyed) drank more than four standard drinks and more than a third (38 per cent) drank 11 standard drinks on the day of delivery.
- A 2020 survey of over 1,600 Victorians on rapid alcohol delivery⁸ found that people who were delivered alcohol weekly were more likely to drink at high risk levels. For these people:
 - 70 per cent drink 11 or more standard drinks in one sitting per week.
 - Over half (57 per cent) experienced memory loss due to alcohol from rapid delivery.
 - Nearly half (48 per cent) of people involved in injury due to alcohol had used rapid delivery alcohol.
- A 2021 self-reported survey of 1,158 Australians⁹ found that over half (59.7 per cent) of people who used rapid delivery reported harmful alcohol use, scoring an 8 or more on the Alcohol Use Disorders Identification Test [AUDIT]. An AUDIT score of 1-7 indicates low risk alcohol use, 8-14 is harmful or hazardous alcohol use and a score more than 15 refers to moderate to severe alcohol use disorder.
- A 2021 survey on rapid alcohol delivery of over 1,000 Victorians¹⁰ showed that nearly two-thirds (61 per cent) of Victorians drank more than 11 standard drinks on a single occasion at least once a year. 18 per cent of people drink at high risk levels, consuming 11 or more standard drinks in a single sitting weekly or more frequently. For Victorians who were sold alcohol via rapid delivery in the previous 12 months:
 - Nearly half experienced memory loss (46 per cent), half of which (45 per cent) claimed that they experienced memory loss since using rapid alcohol delivery.
 - A third experienced different forms of abuse, such as fear, verbal and physical, nearly a third of which believed it resulted from using rapid alcohol delivery. A sixth (15 per cent) reported that they had been under the influence of alcohol when attending work. This represented over a third of people (37 per cent) who used rapid alcohol delivery weekly.
 - Almost one in ten (9 per cent) injured themselves at least once.



Companies do not have adequate processes to ensure alcohol is not sold or delivered to children or people who are intoxicated

Seven studies show that companies often do not check ID at point of delivery, deliver alcohol to people who are intoxicated and leave alcohol deliveries unattended in some instances. Two studies indicated that alcohol company websites offer bulk purchase options for cheap alcohol to drive up sales.

Lack of ID verification at point of delivery

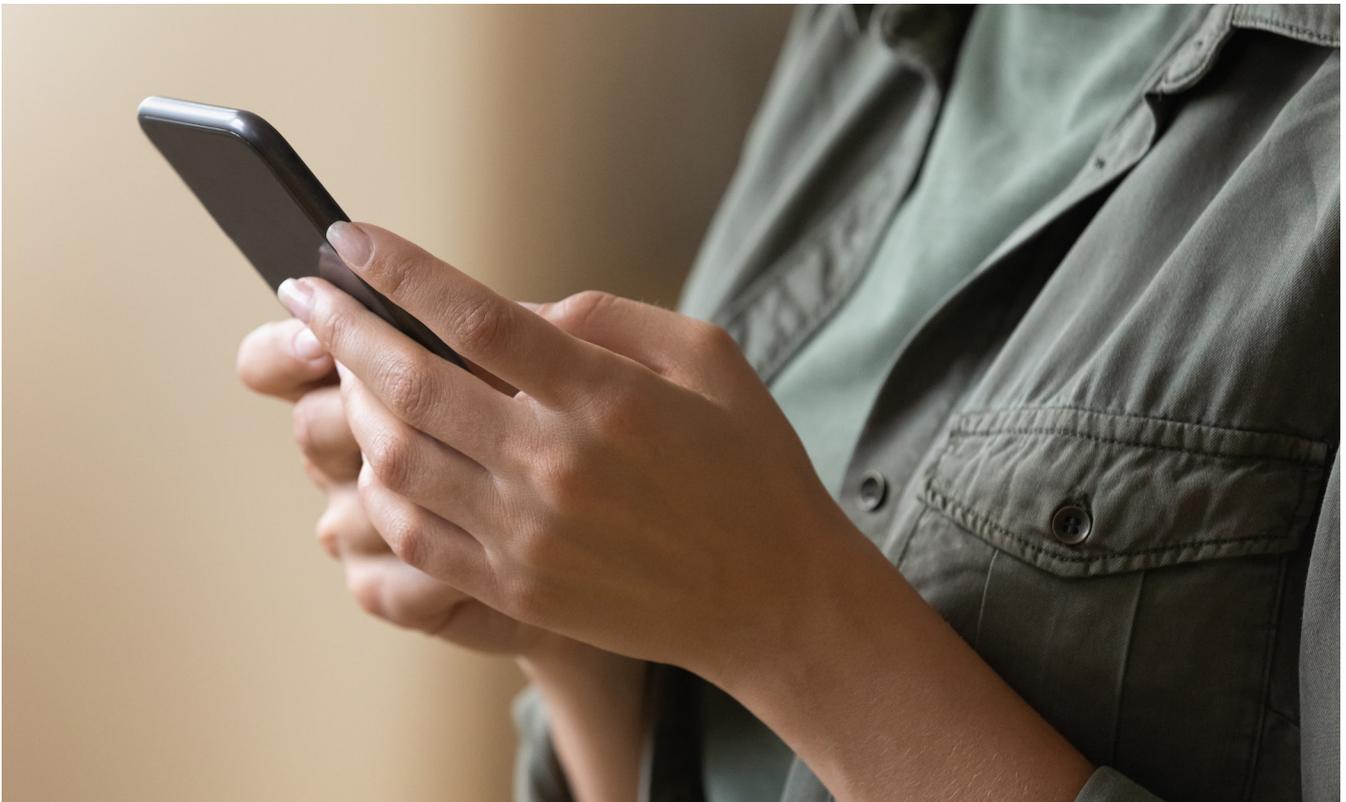
- An audit of 213 online alcohol company websites in 2018¹¹ found that only one in five (22 per cent) mentioned on their website that people aged over 18 could accept alcohol delivery.
 - Only 4 in 10 (40 per cent) required people to disclose their age at the point of purchase.
- A 2019 survey¹² found that over a third of people (36.2 per cent) aged 25 years and under did not have their age verified at the point of delivery.
- Similarly, a Victorian-based survey¹³ found that over a third (35 per cent) reported that their identification was not verified at the point of delivery.
- A 2020 poll¹⁴ reported that only 38 per cent of people who received alcohol had their ID verified.
- A 2022 Western Australian-based test purchasing study¹⁵ of 34 rapid alcohol deliveries involving those aged 18 to 25 years found that only a quarter (24 per cent) of people had their identity verified at point of delivery, despite new WA regulation that same-day deliveries require ID to be checked.
- Another survey study in 2022 of 499 Western Australians¹⁶ complemented the above test purchasing and found that just under half (49 per cent) of all participants had their identity verified, with this being higher for those aged 18 to 24 years (60 per cent).

Delivering alcohol to people who are intoxicated and leaving deliveries unattended

- A 2018 audit of online alcohol company websites¹⁷ found that only a small amount (5 per cent) included a policy about delivering alcohol to intoxicated people.
 - The audit also found that only a quarter (25 per cent) provided options for accepting deliveries if the person who purchased the order is unavailable.
- A 2020 Victorian-based survey¹⁸ showed that 61 per cent of people who were delivered alcohol weekly reported being intoxicated when receiving alcohol.
 - 15 per cent of people had orders accepted by someone else and one in ten had orders left unattended.
- Another 2021 Victorian-based survey¹⁹ found that over a quarter (28 per cent) of people were intoxicated when receiving alcohol delivery. This was the case for over half (57 per cent) of people who used rapid alcohol delivery weekly.
- A 2022 Western Australian-based survey study²⁰ reported that a quarter (24 per cent) were delivered alcohol while intoxicated.

Alcohol companies promote bulk buying of alcoholic products online

- A 2020 analysis of the content on 65 of the most visited alcohol retailer websites²¹ found that one in five (20 per cent) sold large quantities of alcohol (wine, 750 ml) for under \$5.
 - Nearly all (81.5 per cent) online alcohol retailers offered people discounts after they had made bulk purchases.
 - Most alcohol retailers (75.4 per cent) clearly advertised a willingness to leave alcohol deliveries unattended.
- A 2021 study²² of the top 100 online alcohol companies' email marketing to people who had purchased alcohol on one or more occasions found from March to June 2021:
 - Most retailers (67.4 per cent) sent emails to people with special offers and discounts.
 - Nearly half (48.5 per cent) sent emails offering either free or discounted deliveries with a requirement of purchasing a certain amount of alcohol.
- A 2021 self-reported survey of 1,158 Australians²³ found that online promotions by alcohol companies can lead to risky alcohol use:
 - The survey found that more than half (55.2 per cent) of people surveyed had purchased alcohol as part of a promotion.
 - This group purchased a higher number of standard drinks in comparison to those who did not (77.9 in comparison to 44.2, Mann-Whitney U-test statistic). The Mann-Witney U non-parametric test was used in this study to assess the relationship between purchasing alcohol through a promotion with an increase in standard drinks purchases.



The online sale and delivery of alcohol into homes is rapidly increasing

Companies selling and delivering alcohol online

The sale and delivery of alcohol online in Australia is dominated by two companies – Endeavour Group (48.2 per cent market share) and Coles Group (11.6 per cent of market share).²⁴ Together they account for 60 per cent of online alcohol revenue. Endeavour Group owns Jimmy Brings, Dan Murphy's, Shorty's Liquor and BWS. Coles Group owns Liquorland and First Choice.

Other companies include delivery platforms that sell alcohol with or without food, such as UberEats, Deliveroo and Menulog. Companies, such as Vinomofo and Naked Wines deliver alcohol through subscriptions and general sales. Retail chains such as 7-Eleven sell and deliver alcohol through their company, Tipple. Other retail chains, Amazon and Kogan sell and deliver alcohol on their respective websites.

MAJOR ALCOHOL DELIVERY COMPANIES



DELIVERY APPS THAT OFFER ALCOHOL



SPECIALTY ONLINE WINE COMPANIES



OTHER ALCOHOL DELIVERY COMPANIES



ONLINE RETAIL SITES THAT DELIVER ALCOHOL

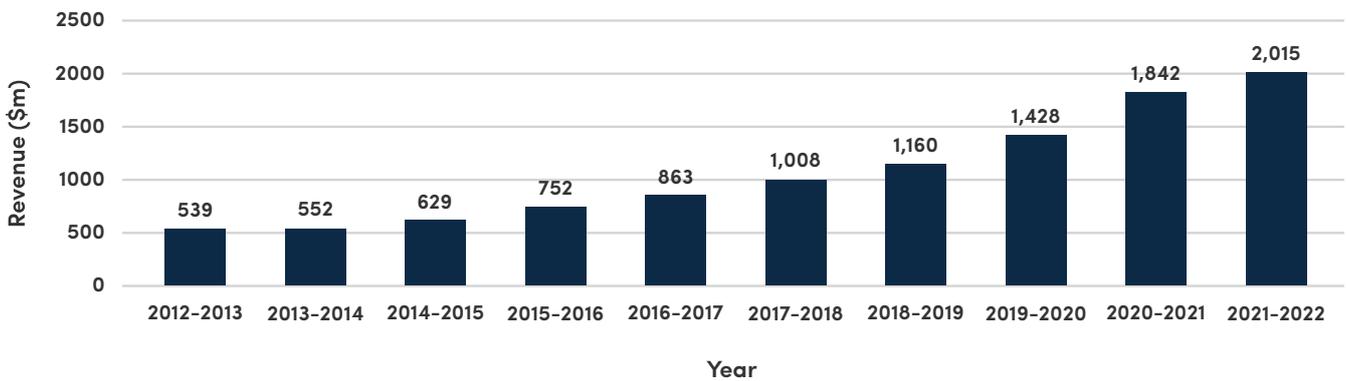


FARE’s analysis of website traffic data found that in 2020,²⁵ total website visits increased to 148 million, of which 134 million visits were to four of the largest online retailers – Dan Murphy’s and BWS, owned by Endeavour Group, and Liquorland and First Choice, owned by Coles. In 2020, the websites reviewed had an estimated 34 per cent increase or 37 million more website views compared to 2019. This was over triple the website traffic growth seen between 2018 and 2019. Almost all websites experienced visitor growth beyond 20 per cent from 2019 to 2020. For most websites (seven of the nine), this growth far exceeded their previous growth rate for 2018 to 2019. Particularly high growth was seen by Dan Murphy’s with 39 per cent growth in 2020 (an additional 22 million views) and Boozebud with 94.7 per cent growth (an additional 2 million views).

Concerning trends in online alcohol retail

In 2022, online alcohol revenue in Australia was \$2 billion. This indicates a nearly four times increase in revenue in a decade (\$539 million) (Figure 1).²⁶ Online alcohol revenue is forecasted to grow at an annual rate of 10.6 per cent to 2026-27.²⁷

Figure 1: Online Beer, Wine and Liquor Revenue (\$m) 2012-2022, Ibis World, 2022



In-depth insight: Endeavour and Coles

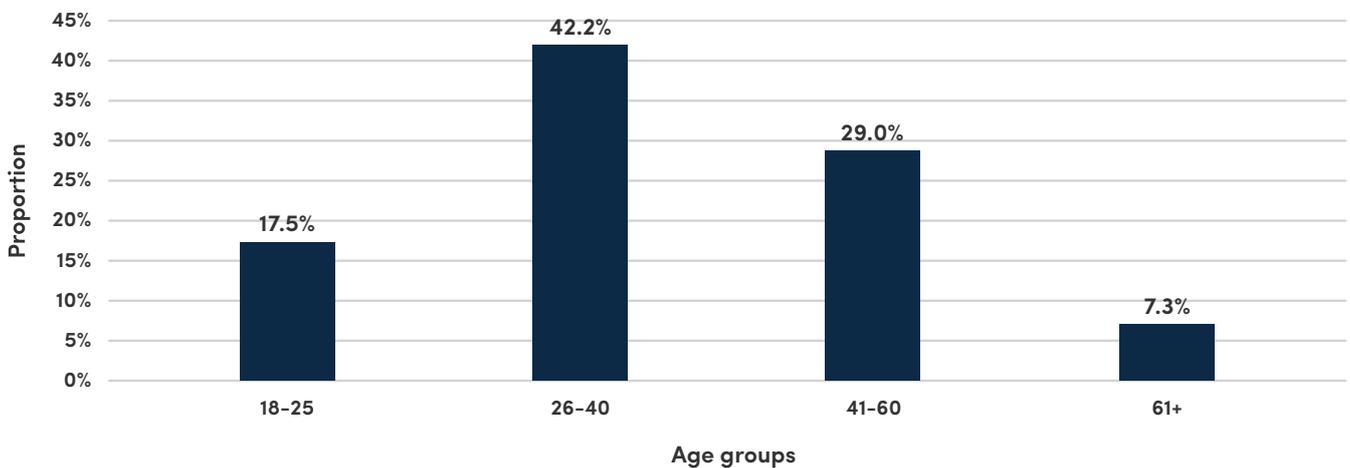
ENDEAVOUR GROUP	COLES GROUP
<ul style="list-style-type: none"> • 48.2 per cent of the online alcohol retail market. • \$1 billion online alcohol retail sales for FY22.²⁸ • 10.1 million monthly website visits and app users. • 45 per cent growth in on-demand delivery (delivery within one hour) in FY22. • \$74 million investment into digital platforms. 	<ul style="list-style-type: none"> • 11.6 per cent of the online alcohol retail market. • \$165 million eCommerce alcohol sales in FY22.²⁹ • 49 per cent growth in eCommerce alcohol sale in FY22.

Alcohol companies are taking advantage of Australia’s online retail market

Roy Morgan’s analysis of online purchases shows that just over one in 10 Australians (11.3 per cent) were sold alcohol online in 2020, which is a threefold increase from 2019 (3.5 per cent).³⁰ FARE’s Annual Alcohol Poll 2020 estimated that one in six Australians (15 per cent) who drink alcohol had been sold alcohol via delivery.³¹

Australians aged 26 to 40 years are the most common age group (42.2 per cent) that are sold alcohol online (Figure 2).³² This is followed by Australians aged 41 to 60 years (29 per cent), 18 to 25 years (17.5 per cent) and 61 and older (7.3 per cent).

Figure 2: Market segmentation of online alcohol purchases, Ibis World, 2022



*Above chart excludes businesses that accounted for 4 per cent of purchases

The Australian regulatory response is not keeping pace with the changing ways companies sell alcohol

Australia's regulatory environment has not kept pace with the changing ways alcohol companies sell alcohol. As a result, the rise of the online sale and rapid delivery of alcohol directly into homes with few checks and balances in place is causing increased harm to families and communities across Australia. Common sense measures are needed to address the increased risk of harm. Alcohol companies must be held accountable so that our communities are kept safe.

Australia's current regulatory response

State and Territory Governments are beginning to introduce much-needed legislative reforms to reduce the risk of harms from companies selling alcohol online. Each state and territory has a Liquor Act which provides the legislative framework for this to occur. However, these frameworks are outdated and still largely focus on on-licence venues – like pubs and bars – rather than take away and online delivery, despite these form of sales accounting for approximately 80 per cent of all alcohol sales in Australia.³³

The Australian Government also has a role to play by acting on digital marketing by alcohol companies, as well as supporting states and territories with digital reforms, such as building capacity to verify age for online alcohol purchases through its Trusted Digital Identity Framework.³⁴

In September 2018, South Australia introduced changes to their Liquor Act³⁵ followed by New South Wales in November 2020,³⁶ Victoria in October 2021³⁷ and Western Australia in February 2022.³⁸ The urgency in the regulatory response was heightened due to the growth of alcohol delivery during the pandemic. Part of this growth is due to liquor licensing relaxations early in the pandemic that allowed an increasing number of businesses to deliver alcohol, relaxations that have been made permanent in many jurisdictions.

While these legislation updates include steps in the right direction, they fall short of what is needed to keep families and communities healthy and safe. With all that is now known about the potential risk of harm from the online sale and delivery of alcohol, further action is needed.

Table 1 provides a summary of key regulatory measures introduced across Australian jurisdictions to date.

Table 1: Online alcohol delivery regulatory measures

REGULATORY MEASURE	SA	NSW	VIC	WA
No unattended delivery for same-day orders, with ID to be checked to ensure the receiver is over 18	✓	✓	✓	✓
Offence for delivery to people who are intoxicated	✓	✓	✓	✓
Records of refused deliveries to be kept	✗	✓	✓	✗
Specific Responsible Service of Alcohol (RSA) training for delivery drivers, with liability on licensees for breaches by drivers if they have not trained them	✗	✓	✗	✓
Digital age verification at point of sale for same-day deliveries	✗	✓	✗	✗
Delivery drivers not to be financially penalised for refusing a delivery due to the person being intoxicated or a minor	✗	✓	✗	✗
Controlled purchasing operation power to investigate sale to minors and other non-compliance	✗	✓	✗	✗

Policies to prevent harms from the online sale and delivery of alcohol

Distilling the evidence about harms from online sale and delivery of alcohol is important to demonstrate a need for action. Equally important is outlining evidence-based policies that can prevent these harms.

Below is a comprehensive list of 13 evidence-based policy priorities with applicability across Australian states and territories. These policies, if implemented, work together to prevent harms to community health.

Preventing harmful practices by alcohol companies

1. Limit late-night deliveries when the risk of alcohol harm is higher

Limit alcohol deliveries to between 10 am and 10 pm to reduce the risks of alcohol-related family violence and suicide, which peak late at night in the home.

2. Delay rapid delivery, which is linked to riskier drinking

Introduce a 2-hour safety pause between order and delivery of alcohol-only orders to stop rapid delivery of alcohol, which is found to contribute to higher risk drinking.

Preventing children from being sold alcohol by companies

3. Introduce effective identification checks for online sales

Require effective online point-of-sale age verification through digital ID checks (collecting ID data safely) to ensure it is not sold to children.

4. Ensure there are effective ID-checks for delivery

Require effective ID checks on delivery to ensure that alcohol is not supplied to children or left unattended.

Preventing predatory marketing, particularly to children and people who are most at risk

5. Prevent predatory marketing that increases the risk of harm

Prevent predatory digital marketing by alcohol companies that promotes excessive and rapid alcohol use and targets people who are most vulnerable. Ban direct prompts such as push notifications and 'buy now' buttons in alcohol marketing.

6. Require digital health warning statements on alcohol marketing

Require alcohol companies advertising in the specific state/territory to display on their websites at least three prescribed rotating health warning statements about the risk of alcohol use, with a link to the Australian guidelines to reduce health risks from drinking alcohol.

Collect data and increase compliance activities to ensure that companies are doing the right thing

7. Improve data collection and reporting

Require alcohol companies to report delivery data by geographic area to regulators (e.g., by Local Government Area), to enable monitoring of deliveries and frequency of issues such as refused deliveries. The government regulator should publish frequent reports on monitoring and enforcement activity.

8. Introduce test purchasing

Use test purchasing operations to enable authorities to enforce the measures that are in place to keep communities healthy and safe, such as not delivering alcoholic products to children under 18 years of age.

Acknowledge the specific risks that online sales and delivery present by creating a framework that is fit for purpose

9. Establish a specific licence category for online liquor licences

Establish online alcohol sales and delivery outlets as a class of liquor license to ensure the community is consulted on new applications by companies. When publishing data about these liquor licences, the regulator should make it clear the geographic area or areas to which alcohol is being delivered in (e.g., by postcode or Local Government Area).

10. Develop specific risk ratings for online delivery

Develop specific risk ratings for the purposes of applying liquor licensing fees for online alcohol delivery, to accurately reflect the risk of harms. This would be reflected in higher licence fees for alcohol companies that deliver online.

11. Reflect genuine outlet density by incorporating online delivery

Include online delivery in the calculation of outlet density in a geographic area as a risk factor to accurately reflect retail outlet location density and alcohol availability.

Ensure that alcohol companies are held accountable for bad behaviour

12. Support delivery staff to be safe and informed

Support delivery staff of alcohol companies through training and policies about refusing delivery, to ensure they are safe, and that they understand their role, rights and responsibilities in refusing delivery of alcohol.

13. Improve compliance by ensuring companies are liable

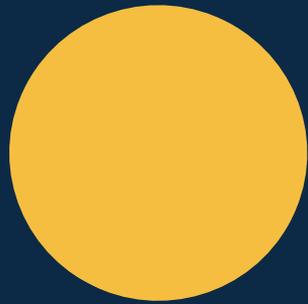
Make it an offence for the licensee to deliver alcohol to people who are intoxicated. The alcohol company (i.e., licensee) must be liable for breaches, such as delivery to children or people who are intoxicated. This is regardless of whether delivery staff are employees or subcontractors.

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