

NAAPA Policy Priorities



About NAAPA

The NSW ACT Alcohol Policy Alliance (NAAPA) is an alliance of organisations advocating for evidence-based solutions to prevent and reduce alcohol-related harms in NSW and the ACT. NAAPA aims to reduce alcohol-related harms by ensuring that evidence-based solutions inform alcohol policy discussions in NSW and ACT.

NAAPA currently has 39 member organisations from a range of fields including health, community, law enforcement, emergency services and research organisations. To find out more about NAAPA visit www.naapa.org.au or if you are interested in joining email us at naapa@fare.org.au

Policy priorities

The harms that result from alcohol consumption are not limited to Kings Cross in Sydney and Civic in Canberra. They result from drinking at bars, pubs and at home and include a broad range of immediate and long term health conditions, injuries and death.

Young people and Aboriginal and Torres Strait Islander peoples experience disproportionate levels of alcohol-related harms. Consumption of alcohol during pregnancy can also result in a child being born with Fetal Alcohol Spectrum Disorder, a lifelong disability.

Effective interventions to reduce alcohol-related harms need to consider the range of harms that result from alcohol consumption, the various patterns of drinking and the environment in which alcohol is consumed. Policies also need to consider the impacts of both on-licence (bars and clubs), as well as off-licence (retailers and take-away outlets) premises.

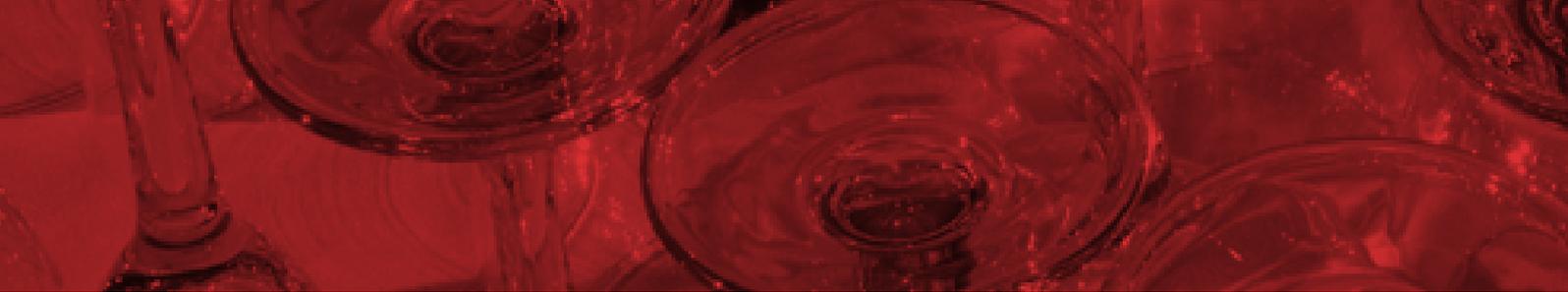
The ways that alcohol is sold, promoted and made available all contribute to the way that alcohol is consumed and the associated harms. Across Australia today alcohol is the most affordable that it has been in over three decades, it is more available than it ever has been and it is more heavily promoted.

State and territory governments have the opportunity to reduce alcohol-related harms because they are responsible for the development and enforcement of liquor licensing legislation, which controls the number and types of liquor licenses available in each jurisdiction, as well as the way that alcohol is promoted. They also determine the extent to which the community is able to influence the number and type of licensed premises in their local areas and the accountability of liquor licensees.

State and territory governments are also responsible for the provision of a range of services relating to the consumption of alcohol including school and community education, enforcement, compliance, policing, healthcare provision and alcohol and drug services.

NAAPA's policy priorities are focused on three areas where the NSW and ACT Governments can have the greatest influence in reducing alcohol-related harms. These are:

1. Alcohol availability;
2. Alcohol pricing and promotion; and
3. Community engagement.



Alcohol availability

Increased availability of alcohol, both through the increased concentration of licensed premises and longer trading hours, contributes to alcohol-related harms and violence, with both on-licence and off-licence premises contributing to these harms.

Increased liquor licence density is associated with increased assaults, domestic violence and chronic disease. In NSW there are currently 15,115 liquor licences or one licence for every 371 people aged over 18 years.¹ In the ACT there are 660 liquor licences or one licence for every 423 people aged over 18 years.²

A recent Australian study on the effects of liquor outlet density on alcohol-related harms found that an increase in all liquor licence types results in increased assaults. The study also found that an increase in packaged liquor outlets results in an increase in chronic diseases, domestic violence and young people drinking at risky levels.³

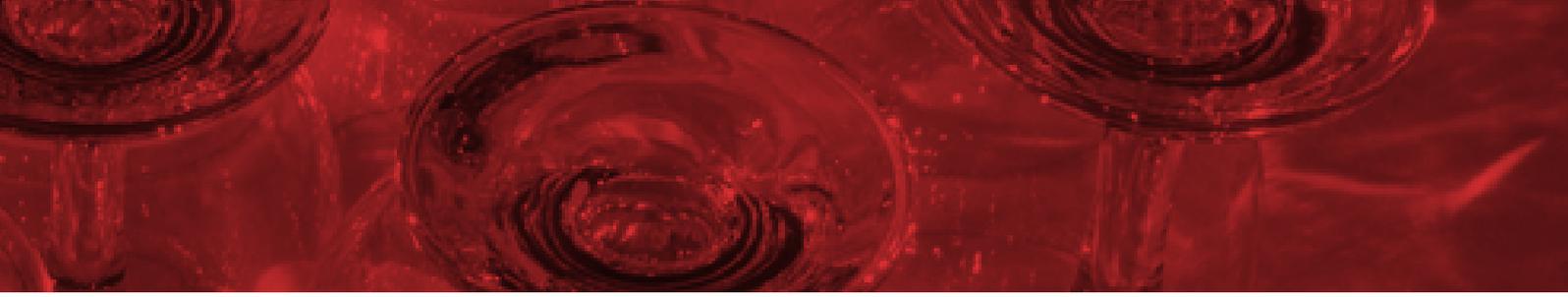
Neither NSW nor the ACT has restrictions on the number of licensed premises permitted in specified areas, and this is rarely a consideration when the decision to grant a licensing application is made. This has resulted in a proliferation of liquor licences in particular areas. For example in the City of Sydney there are 2,205 licensed premises, of which 287 can trade for 24 hours a day and 666 can trade after midnight.⁴ While a liquor licensing freeze is in place in Sydney, this is a quick fix to a longer term problem that requires enduring solutions. The type and number of licensed premises in specified areas needs to be regulated to ensure that areas do not become saturated with licensed premises.

Increased trading hours are also associated with increased harms.⁵ Recent restrictions introduced in Newcastle demonstrate how even modest reductions in the trading hours of licensed venues can substantially reduce alcohol-related harms.

In 2008 trading hours in Newcastle were brought back to 3:30am from 5am, a lock out was applied from 1:30am and restrictions were applied on the types of drinks available for sale. An evaluation carried out in 2011 found that there has been a sustained reduction in night-time non domestic assaults of 35 per cent, a 50 per cent reduction in night-time street offences and a 26 per cent reduction in night time assault related emergency department presentations.⁶ The evaluation also found that there was no geographic displacement to the nearest late night district of Hamilton.⁷

Policy action required

- Establish and enforce 'saturation zones' which impose limitations on the provision of new licenses in areas that are identified as already having large numbers of licensed premises.
- Introduce 'cumulative impact' and 'cluster control' policies which prohibit new licenses from being granted within a specified distance of existing licensed premises.
- Introduce a 3am common closing time and 1am lock out for all pubs and clubs across NSW and the ACT.
- Impose a moratorium that prevents trading after midnight for new liquor licenses and existing licenses seeking extensions.



Pricing and promotion

Increasing the price of alcohol reduces alcohol consumption and related harms. The World Health Organization reported that policies which increase the price of alcohol have been found to reduce the proportion of young people who are heavy drinkers, reduce underage drinking, and reduce per occasion 'binge drinking'.⁸ Despite this, alcohol can still be purchased in Australia as cheaply as 25 cents for a standard drink.

While the Commonwealth Government is responsible for setting alcohol taxes, there is a role for the NSW and ACT Governments in ensuring that bottle-shops, pubs, clubs and other retailers don't recklessly promote discounted products or carry-out activities that encourage the excessive consumption of alcohol. Currently both jurisdictions' Liquor Acts specify that promotions which encourage the excessive consumption of alcohol are prohibited.

The Liquor Act 2007 (NSW) currently allows for the Director of Liquor and Gaming to restrict or prohibit activities or promotions that they deem to be undesirable".⁹ Undesirable activities and promotions include the provision of alcohol in non-standard measures that encourage irresponsible drinking and providing free drinks or discounts that create an incentive for people to consume alcohol more rapidly. These promotions also include point of sale (POS) promotions which involve price or volume discounts, which have been found to be particularly effective in encouraging the purchase of increased volumes of alcohol. Point of sale promotions are concerning as they result in young people (including minors) being regularly exposed to advertisements and promotions that depict alcohol consumption as a fun, social and inexpensive activity.¹¹

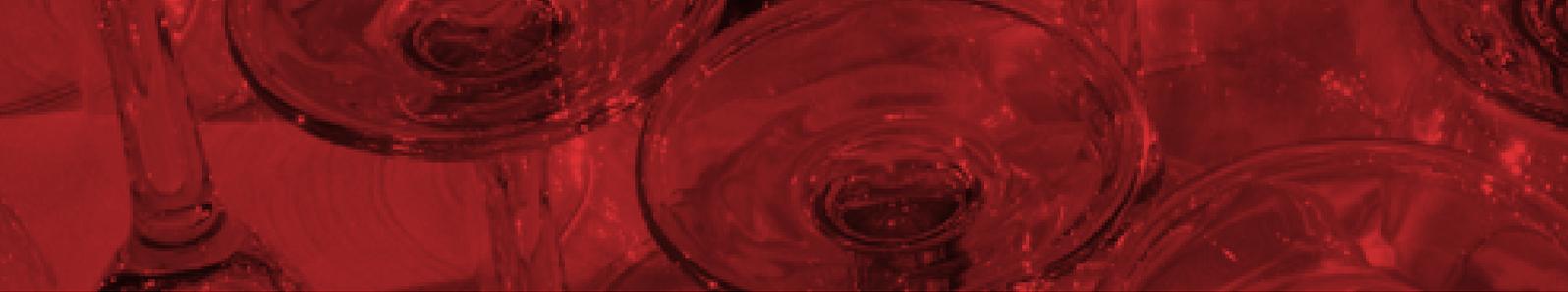
Studies have shown that exposing young people to alcohol advertising and promotions increases the likelihood of them starting to consume alcohol as well as increasing consumption in those already consuming alcohol.^{12,13,14}

The Liquor Act 2010 (ACT) allows for the Commissioner of Fair Trading to ensure that advertising and promotion of alcohol products encourages "responsible attitudes and practices towards the sale, supply, promotion and consumption of liquor".¹⁰ The Liquor (Responsible Promotion of Liquor) Guidelines 2012 (No 1) set out a range of principles to regulate the promotion and advertising of alcohol products. These principles include that the advertising or promotion of liquor must not encourage the consumption of liquor in excess, must not discount products beyond reasonable limits and must not use non-standard measures of liquor.

While these provisions exist within the respective legislation, they are rarely enforced. This is apparent by the sheer number of activities encouraging the excessive consumption of alcohol that still occurs across both jurisdictions, including happy hours and bulk-buy discounts.

Policy action required

- Prohibit the harmful discounting and promotion of alcohol products at on-licence and off-licence premises, and ensure these measures are enforced.
- Prohibit the sale of shots, mixed drinks with more than 30mL of alcohol and ready mixed drinks stronger than five per cent alcohol by volume after 10pm.
- Prohibit the sale of more than four drinks to any person at one time and implement and enforce a requirement to provide free water stations at every licensed premise.
- Prohibit the sale of alcohol mixed with energy drinks after midnight.
- Clarify and tighten regulations regarding point of sale promotions with a view to minimising minors' exposure to these promotions in and around licensed premises and in public-access areas.



Community engagement

Members of the general public and people working in areas that are directly affected by alcohol use and misuse should have the opportunity to comment on, and raise concerns regarding, applications for new licensed premises or variation to existing licenses. However, the burden of proof often lies solely with the community member or organisation, demonstrating that a licence application will negatively affect their neighbourhood, rather than on the potential licensee to demonstrate that their premise will do no harm.

The Liquor Act 2007 (NSW) includes a requirement for liquor licence applicants to prepare a Community Impact Statement and consult with community representatives such as local councils, police, health services and community organisations to 'seek a range of views and possible concerns'.¹¹ They are also required to prepare a notification to occupiers of nearby premises. However after changes to the NSW Liquor Act there is now no requirement for a notice to be provided in local newspapers.¹²

The Liquor Act 2010 (ACT) includes a requirement for liquor licence applicants to notify the public of a new liquor licence application by displaying a sign about the application at the relevant premises and publishing a notice about the application in a daily newspaper.

While provisions for consultation exist in NSW and the ACT, the data and evidence requirements to support submissions are often extensive and require expertise in research and legal areas. Members of the general public and relevant organisation do not usually have the resources at their disposal to gather the data needed to prepare submissions. This can result in warranted concerns being overlooked.

Community education campaigns are also required to ensure that the general public is aware of the risks associated with consuming alcohol. There is a need for better promotion of the respective Liquor Acts, including raising awareness of the penalties that apply for providing alcohol to underage people who are intoxicated. Education campaigns should be carried out using a range of approaches including school-based education and community education programs.

Policy action required

- Provide greater opportunities for people to engage with consultation processes for new liquor licenses or variations of licenses.
- Establish a service to support people and organisations that wish to raise concerns regarding new liquor licenses or changes to licenses.
- Develop effective public education campaigns to raise awareness of the risks associated with alcohol consumption, ways to avoid these risks and the liquor licensing laws.

References

- ¹ Casino Liquor and Gaming Control Authority. (2011) Annual Report 2010/11. Available at: <http://www.ilga.nsw.gov.au/resource/reports/2010-11%20ANNUAL%20REPORT.pdf>
- ² ACT Government Justice and Community Safety. (2012). Liquor Licence Public Registers. Available at: http://www.ors.act.gov.au/community/liquor/liquor_licence_public_registers
- ³ Livingston, M., Laslett, A-M., and Dietze, P. (2008). Individual and community correlates of young people's high-risk drinking in Victoria, Australia. *Drug and Alcohol Dependence*, 98:241-248.
- ⁴ City of Sydney. (2012). Cumulative impact research. Submission to the NSW Office of Liquor, Gaming and Racing Inquiry into the cumulative impact of licensed premises in NSW. Sydney: City of Sydney.
- ⁵ National Drug Research Institute (2007). *Restrictions on the Sale and Supply of Alcohol: Evidence and Outcomes*. Perth: National Drug Research Institute, Curtin University of Technology.
- ⁶ Wiggers, J. (2012). Presentation to the Newcastle CDAT Forum March 2012, Research evidence for reducing alcohol-related harm.
- ⁷ Ibid.
- ⁸ World Health Organization. (2012) *Addressing the harmful use of alcohol : a guide to developing effective alcohol legislation*. Geneva: WHO Regional Office for the Western Pacific
- ⁹ New South Wales Consolidated Acts. (2012) LIQUOR ACT 2007. Available at: http://www.austlii.edu.au/au/legis/nsw/consol_act/la2007107/
- ¹⁰ ACT Government. (2012) Liquor (Responsible Promotion of Liquor) Guidelines 2012 (No 1). Available at: <http://www.legislation.act.gov.au/ni/2012-127/current/pdf/2012-127.pdf>
- ¹¹ NSW Parliamentary Library Research Service, E-Brief, Liquor Licenses and Lockouts, November 2008 E-Brief 4/08
- ¹² Ibid.

Founding members

The following organisations are founding members of NAAPA:

1. Foundation for Alcohol Research and Education
2. Network of Alcohol and Drug Agencies
3. Darlinghurst Resident Action Group
4. Newcastle Community Drug Action Team
5. Police Association of NSW
6. Australian Medical Association NSW
7. The Royal Australasian College of Surgeons
8. Public Health Association NSW Branch
9. Cancer Council NSW
10. National Drug and Alcohol Research Centre
11. Centre for Health Initiatives, University of Wollongong
12. Australasian College of Emergency Medicine
13. Jewish House Limited
14. Inspire Foundation
15. The Asia Pacific Centre for Crime Prevention Griffith University (Sydney)
16. University of Newcastle
17. Ulladulla Community Drug Action Team
18. Drug and Alcohol Research and Training Australia
19. Bondi Residents Association
20. Ted Noffs Foundation
21. St Vincent's Hospital
22. Australian Drug Foundation
23. Health Services Union
24. Pedestrian Council of Australia
25. The Salvation Army NSW
26. Awabakal Newcastle Aboriginal Co Operative Ltd
27. The Royal Australasian College of Physicians
28. Hello Sunday Morning (HSM)
29. Byron Bay Youth Service
30. Law Enforcement Against Prohibition (LEAP)
31. NSW Nurses and Midwives Association
32. 2011 Residents Association
33. Karralika Programs Inc.
34. Alcohol Tobacco and Other Drugs Association ACT (ATODA)
35. Ted Noffs Foundation (ACT)
36. Canberra Recovery Service, Salvation Army
37. Public Health Association of Australia ACT Branch
38. Bondi Beach Precinct
39. Cancer Council ACT
40. Australian Medical Association ACT
41. Directions ACT
42. Last Drinks at 12
43. CatholicCare Canberra and Goulburn
44. Mental Health Association of NSW

Contact

If you would like to find out more information about NAAPA, please visit www.naapa.org.au or contact us at:

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