



Central Australian
Aboriginal Congress
ABORIGINAL CORPORATION | ICN 7823

Submission to the
Northern Territory Liquor Commission
Review of takeaway licence conditions in Alice Springs
28 September 2018

Executive Summary

Congress supports the Northern Territory Government's comprehensive package of measures to reduce the high levels of alcohol-related harm across the Territory, including the Banned Drinkers register (BDR), the Minimum Unit Price (MUP) and the re-establishment of the Northern Territory Liquor Commission.

To supplement these Territory-wide reforms, the Northern Territory Liquor Commission should support additional 'place-based' measures to address regions with higher levels of alcohol use and harms, including in Alice Springs:

- supporting the effective full implementation of Point of Sale Interventions (POSIs) outside takeaway alcohol outlets by introducing additional restrictions on trading hours and on certain types of takeaway licences
- reducing take-away trading hours on Saturdays (currently 10am to 9pm) by four hours to 2pm to 9pm
- restrictions on certain types of take-away liquor licences especially those grocery stores where the sale of alcohol makes up a significant proportion of turnover
- continued restrictions on the purchase of certain types of takeaway alcohol associated with high levels of harm such as cask wine and fortified wine in large containers.

To ensure the effective monitoring of the POSI strategy, the Liquor Commission should establish a phone hotline and/or email address by which members of the public can report when POSIs are not in place, and gather and report on this data.

Congress supports the current restrictions on types of alcohol able to sold as takeaway in Alice Springs (no longneck beer bottles or wine casks larger than 2 litres; no more than one bottle of fortified wine or wine cask per person per day, and only after 6pm).

Background

1. Central Australian Aboriginal Congress (Congress) welcomes the opportunity to make a submission to the Northern Territory Liquor Commission's (the Commission's) review of takeaway licence conditions in Alice Springs.
2. As the Commission will no doubt be aware, Congress is a large Aboriginal¹ community controlled health service based in Alice Springs. We are one of the most experienced organisations in the country in Aboriginal health, a national leader in primary health care, and a strong advocate for the health of our people. We have been active for many years in both the treatment of alcohol-related problems amongst the communities we serve, and in advocating for evidence-informed policy to prevent alcohol-related harm.

The Northern Territory context

3. Congress supports **the Northern Territory Government's commitment to a** comprehensive package of measures to reduce the high levels of alcohol-related harm across the Territory.
4. In particular, there are two Territory-wide approaches – the Banned Drinkers register (BDR) and the Minimum Unit Price (MUP) of \$1.30 per standard drink – which provide a strong foundation for healthy public policy. Over time we expect these and other measures to benefit all Territorians, including Aboriginal individuals and families in Alice Springs, by decreasing overall levels of consumption and reducing access to alcohol by those who misuse it.
5. The re-establishment of the NT Liquor Commission has also been a major reform which has enabled this current inquiry to take place. This along with the proposed re-writing of the *Liquor Act* with the introduction of risk based licensing and other reforms will further add to the mix of effective Territory wide measures to address alcohol harms.
6. However, additional measures are required on a place-by-place basis to address significantly higher alcohol consumption and corresponding alcohol-related harms in some regional areas of the Northern Territory, including in Alice Springs and surrounding areas.

¹ This paper uses the term 'Aboriginal' to refer to 'Aboriginal and Torres Strait Islander' and/or 'Indigenous' on the basis that this is the preferred term in Central Australia where Congress is based.

A 'place-based' approach for Alice Springs

7. To supplement the Territory-wide package of reforms, Congress supports for Alice Springs:
 - a. the effective implementation of Point of Sale Interventions (POSIs) outside takeaway alcohol outlets by introducing additional restrictions on trading hours and on certain types of takeaway licences;
 - b. reducing take-away trading hours on Saturdays (currently 10am to 9pm) by four hours to 2pm to 9pm;
 - c. restrictions on certain types of take-away liquor licences especially those grocery stores where the sale of alcohol makes up a significant proportion of turnover; and
 - d. continued restrictions on the purchase of certain types of takeaway alcohol associated with high levels of harm such as cask wine and fortified wine in large containers,

Supporting Point of Sale Interventions (POSIs)

8. The monitoring of Alice Spring's take-away alcohol outlets by police through Point of Sale Interventions to prevent the purchase of take-away alcohol by those living on alcohol-prohibited land, including the secondary supply of alcohol has been a very effective measure to reduce levels of alcohol-related harm. However, the effectiveness of this strategy is highly dependent on all outlets being consistently monitored at all times they are selling takeaway alcohol².
9. However, in the lead up to and following the re-introduction of the BDR on 1 October 2017, the Northern Territory Police reduced the use of POSIs, citing both resourcing issues and an objection to this type of police work. As a result we believe there has been a significant increase in alcohol consumption and potentially preventable alcohol related harms including premature deaths. **Congress was a party to the letter that the People's Alcohol Action Coalition wrote to the Commission detailing 7 potentially preventable deaths in Alice Springs this year. This is unacceptable and needs to be addressed.**
10. Congress is also aware that there has also been a significant spike in potentially preventable alcohol related deaths in remote communities in Central Australia as the flow of alcohol into remote communities from Alice Springs has significantly increased with the absence of full coverage of POSIs.

² While a proposed longitudinal study will document the precise impact of POSIs, Congress has seen data that suggest that when full coverage is achieved, alcohol related harms including assaults have been reduced by up to 50% in Alice Springs and 70% in Tennant Creek.

11. We understand that the Northern Territory Government has resourced 75 Police Auxiliary Liquor Inspectors (PALIs) to conduct POSI duties outside takeaway alcohol outlets in Alice Springs, Tennant Creek and Katherine, and that the first squad of 18 PALIs has graduated and is currently being trained on the job in Alice Springs. Another 30 PALIs are about to commence their basic training. However, this has not led to full coverage with POSIs, and it is likely that even with additional staffing in place, there may not always be enough positions to effectively implement the POSI strategy at full rostering, which depends on full coverage of all outlets during all trading hours.
12. Restrictions on take-away trading hours and a reduction of the number of licences will reduce the level of police resources required for full coverage of takeaway outlets, and is therefore an important way of ensuring the effective use of POSIs.
13. Reducing take-away trading hours without ensuring there is full coverage with POSIs will not be as effective as full coverage with POSIs on current trading hours and the Commission needs to ensure that any reduction in trading hours is met with a commitment from the police for full coverage with POSIs.
14. To ensure effective monitoring of the POSI strategy and contribute to the understanding of what resources are required to maximise its effectiveness, the Liquor Commission should establish a phone hotline and/or email address by which members of the public can report when POSIs are not in place, and gather and report on this data.

Restrictions on trading hours

15. Congress supports the reduction of the total hours that takeaway alcohol is available for sale in Alice Springs, as a strongly evidenced way of reducing consumption, and also as a way of ensuring the effectiveness of POSIs by reducing the hours during which these places will need to be monitored (see above). Consequently, we recommend that the Liquor Commission:
 - a. maintains current restrictions on trading hours for the purchase of takeaway alcohol for weekdays (2pm to 9pm); and
 - b. reduces take-away trading hours on Saturdays (currently 10am to 9pm) by four hours to 2pm to 9pm.

Reducing the harm for some types of licences

16. Certain types of takeaway licence are well known to contribute significantly to alcohol-related harms in Alice Springs. These include grocery stores where alcohol sales are a major focus of the business and make up a significant proportion of business turnover.

17. Congress supports the recent Northern Territory Government announcement³ that will cap the revenue from alcohol at licensed grocery stores at 25%, although we believe that over time this cap should be reduced to the 15% **recommended by last year's** independent *Alcohol Policies and Legislation Review* (the Riley Review).
18. These measures alone will reduce the supply of alcohol in the town. Should these businesses be unable to continue trading under these circumstances – in other words, if their business model is dependent on the dangerous sale of alcohol and the harms it causes – then the reduction in the number of licences will further reduce the supply of alcohol, and contribute to the effectiveness of the POSI strategy by reducing the number of outlets needing to be monitored.

Types of alcohol available

19. Congress supports the current restrictions on types of alcohol able to sold as takeaway in Alice Springs (no longneck beer bottles or wine casks larger than 2 litres; no more than one bottle of fortified wine or wine cask per person per day, and only after 6pm).

³ <http://www.abc.net.au/news/2018-09-20/liquor-sales-alcohol-policy-plan-nt-government-industry/10287484>