

Submission – Asta Hill

Northern Territory Liquor Commission Notice of Proposed Variation of Licence Conditions

Introduction

Herein is feedback on the Northern Territory Liquor Commission (**Commission**) Notice of Proposed Variation of Licence Conditions (**Notice**) dated 20 November 2025. The Commission invites interested persons, agencies and organisations to submit a response to its Notice within 28 days. While I am the Mayor of Alice Springs Town Council, I lodge this submission in a personal capacity as I have not received the endorsement of Elected Members to lodge a submission on behalf of the Alice Springs Town Council. I am nonetheless an “interested person”. I worked in the criminal justice system in Alice Springs for 10 years – as a Prosecutor, legal aid lawyer, and criminal defence lawyer at a local domestic violence legal service. I am an active member of the community, who was born and raised in Alice Springs, and who has close connections with diverse sections of the community. This submission provides an overview of the harms associated with alcohol use, with particular focus on community safety in Alice Springs. My position on the three licence variations proposed in the Notice is then provided. I express full support for condition one, which requires meal service with full strength-alcohol purchased between 1130 and 1500 on designated weekdays. With a caveat on facial scanning, I support condition two, which establishes on-premises identification systems to screen people seeking to purchase alcohol for consumption. And without sufficient detail as to practices relating to disturbances, I do not support condition three.

Background

The negative impacts of alcohol use are pervasive, owing to its poisoning, intoxicant, and dependence-producing properties. Here, I briefly revisit the nature and impact of alcohol-associated harms, and tie these to community safety concerns in Alice Springs.

Harm

Individual and social harms associated with alcohol use have been well described. Single occasion consumption of more than four standard drinks increases the risk of street and family violence, sexual assault, motor vehicle crashes, crime and other anti-social behaviours.(1)(2) Alcohol is responsible for 4.1% of the total burden of disease and injury in Australia and was directly attributed to 1,663 deaths in 2023.(3) Ninety per cent of alcohol-induced deaths are related to conditions arising from chronic consumption, such as liver cirrhosis and cancer.(3) Harm from alcohol consumption extends to developing fetus. Exposure to alcohol in pregnancy can lead to poorer perinatal outcomes, and life-long complications of neurodevelopmental abnormalities such as Fetal Alcohol Spectrum Disorder.(1)(3) Societal costs are conservatively reported to be twice the revenue generated from alcohol taxation due to diminished industry productivity, and demands on health, policing, justice, and local government services to manage complications.(4)

There are defined populations at higher risk of excess alcohol consumption: First Nations Australians, people with mental health conditions, socially isolated individuals, and those with experiences of trauma.(1)(3) In our community and relevant to the proposed variations, the wellbeing of First Nations people are of particular concern. A greater proportion of Aboriginal people abstain from alcohol consumption relative to non-Aboriginal Australians.(3) However, the enduring negative consequences of colonisation drive riskier consumption of alcohol among First Nations people, owing to structural marginalisation, dispossession of lands, dislocation of families through removal, and intergenerational trauma.(5)(6)(7) This is consistent with Indigenous populations globally.(5) Moreover, in all at-risk groups, the impact of alcohol harm is exacerbated by financial precarity, lack of employment and housing, remote living, and lower levels of education.(1)

Local impact

The impact of alcohol harm in the Northern Territory is exceptional. The Northern Territory has the highest proportion of risky alcohol consumers (40.4%)(3) and corresponding high rates of poor health, violence, and crime. The Northern Territory has the highest rate of alcohol-induced deaths,(3) almost double the national value, and the highest rate of alcohol intoxication-related ambulance attendances.(3) One in five injury hospitalisations (22.4%) are associated with alcohol use, much of which are due to assault (46%).(8) Together, the social costs and harms of alcohol consumption in the Northern Territory is estimated to be \$1.38 billion annually.(9)

In Central Australia, alcohol consumption has diminished, but without commensurate reductions in alcohol related harms.(10)(11) The number of alcohol-related assault offences involving domestic violence in Alice Springs has fluctuated between 44 to 83 per month over the past 20 months.(12) Drink driving offences and alcohol-related emergency department presentations are higher in Alice Springs than elsewhere in the Northern Territory.(12) In the most recently reported month, there were 65 alcohol-related assaults through September 2025.(13)

Disproportionate disadvantages faced by Aboriginal people in Central Australia are visible in most social indices, not least alcohol-associated. In Alice Springs, 110 per 1,000 Aboriginal residents experienced alcohol-attributable hospitalisations in 2020 – almost 20 times the national rate.(14) Alcohol-induced deaths for First Nations people are up to 10 times more than non-Aboriginal Territorians.(14) The association between alcohol use and domestic violence is well established, and for Aboriginal communities, family violence is more common and more severe. Aboriginal women are 3.6 times more likely to experience domestic-related assaults in Alice Springs than the rest of the Northern Territory.(15)(16) And more broadly, First Nations women are 35 times more likely to be hospitalised due to family violence-related assaults than other Australians.(17) That alcohol causes domestic family and sexual violence, or is sufficient in itself to predict violence, is a dangerous misconception. However, it is uncontroversial that alcohol use is an enabler which increases the probability, frequency and severity of such violence.(18)

I commend the Liquor Commission for proposing further reform as I reflect on the reality of the impact alcohol consumption has on our community, in particular First Nations people. I echo calls from Aboriginal Community Controlled Health Organisations for collaborative change, centering Aboriginal-led, self-determined strategies in the development of evidence-based alcohol policy. We must prioritise passage of suitable alcohol reform to protect and promote fundamental rights

to health, safety, and liveable communities, especially among Aboriginal populations who are most structurally vulnerable to alcohol's harms.

Community Safety in Alice Springs

Community safety is a core concern for many residents of Alice Springs. The Commission was asked to conduct an own motion review of licence conditions pursuant to s 113 of the *Liquor Act 2019* (NT). The request by Mr Owen Cole, Managing Director of Yeperenye Pty Ltd raised "concerns with the conduct of the licensed premises operating in the CBD of Alice Springs... both the manner that the CBD bars are being operated and the negative, anti-social issues arising from their mode of operations". The second request, by Central Australian Aboriginal Congress stated that it had received: "multiple reports... describing regular disturbances involving individuals who appear intoxicated, shouting, engaging in aggressive behaviour, and at times, physical violence directly outside these venues." The concerns underpinning the review request accord with documented high rates of alcohol related assaults and alcohol related assault offences involving domestic violence in Alice Springs outlined above. While licence variations will not alone solve broader problems of alcohol-related harm, their ability to impact community safety, particularly in the CBD, compels me to provide feedback on the Proposed Variation of Licence Conditions.

Proposed variations

Variation 1 - Full-strength alcohol only with a full meal

Regarding the Northern Territory Liquor Commission Notice of Proposed Variation of Licence Conditions, I support the first condition that, between 1130 and 1500 hours on Wednesdays, Thursdays and Fridays, full-strength liquor must not be supplied, sold, served or consumed on the premises except when served with a full meal.

Variation 2 - On-premises identification system

I support a condition to establish on-premises identification systems to screen people seeking to purchase alcohol for consumption. I expect that this measure is likely to deter and prevent some banned drinkers who are currently unable to purchase takeaway liquor from circumventing the Banned Drinking Register (BDR) by drinking on premises. That, in my view, is in the community's interest. I also note the recommendations of Coroner Armitage in *Inquests into the deaths of Miss Yunupiju, Ngeygo Ragurk, Kumarn Rubuntja and Kumanjayi Haywood* [2024] NTLC 14, and lament that her Honour's calls for a government mandated 12-month trial of BDR scanners in licensed premises have not been heeded.

The Notice proposes a condition requiring licensees to establish an on-premises identification system to determine whether a person is prohibited from purchasing or consuming liquor by a banned drinker order, court order, bail condition or banning notice. I expect that compliance with this condition would require a high degree of information sharing between licensees and government agencies, and suggest that "practical, technical and financial hurdles" anticipated by the Commission be overcome by designating of a lead Agency responsible for the coordination and oversight of this process.

It is unclear whether the Commission requires facial scanning under this condition, or what that entails. Facial scanning does not feature in the proposed conditions at paragraphs [3]-[4] of the

Notice, however it is referenced at [66]: “At the entrance to premises, patrons are asked to show photographic ID, which is, along with their face, scanned, and checked against a list of currently banned persons that is stored on the system.” If facial scanning is required, that component of the condition is not supported. Justification for that measure, which exceeds steps taken to screen for alcohol prohibitions at takeaway outlets, is not contained in the Notice. The technology utilised for facial scanning is not canvassed in the Notice. In circumstances where Facial Recognition Technology (FRT) may be used, I have concerns for the privacy of community members. FRT involves the collection of a digital image of an individual’s face and the extraction of their distinct features into a biometric template which is considered “sensitive information” under the *Privacy Act 1988* (Cth). FRT must only be used when it is necessary and proportionate and where the purpose cannot be reasonably achieved through a less privacy intrusive means. Moreover, if FRT is used, organisations must take reasonable steps to protect personal information they hold from misuse, interference and loss, as well as unauthorised access, modification and disclosure. Without sufficient information about the type of technology proposed for facial scanning, or the justification for its use under the proposed licence variation, it is not supported.

Variation 3 - Practices relating to disturbances

I do not support the third condition of practices relating to disturbances. The proposed variation would require licensees to take reasonable steps “(a) to prevent undue offence, annoyance, disturbance, noise or inconvenience to people... in the vicinity of the licensed premises...and (b) to ensure public order and safety.” Requiring licensees to take “reasonable steps” in these situations confers a degree of discretionary power beyond which I cannot comfortably endorse.

Conclusion

I acknowledge the work the Commission has conducted to advance the Notice. Cumulatively, alcohol consumption has profound detrimental effects on our community. I support passage of reforms that enhance safety in Alice Springs. I support the proposed variations to restrict full-strength liquor supply and institute on-premises identification systems. There is inadequate justification for use of facial scanning technology. I do not support the third variation of practices relating to disturbances. In making this submission, I also call for collaboration that empowers Aboriginal voices and recognise the entrenched and ongoing impacts of colonisation occasioning systemic inequities that contribute to excessive alcohol related harm among First Nations people.

References

1. Australian Government Department of Health. National Alcohol Strategy 2019–2028 [Internet]. Canberra: Department of Health; 2019 [cited 2025 Dec 4]. Available from: <https://www.health.gov.au/resources/publications/national-alcohol-strategy-2019-2028?language=en>
2. Griswold MG, Fullman N, Hawley C, Arian N, Zimsen SR, Tymeson HD, Venkateswaran V, Tapp AD, Forouzanfar MH, Salama JS, Abate KH. Alcohol use and burden for 195 countries and territories, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016. *Lancet*. 2018 Sep 22; 392(10152): 1015-35.
3. Australian Institute of Health and Welfare. Alcohol, tobacco and other drugs in Australia: Alcohol [Internet]. Canberra: AIHW; [cited 2025 Dec 4]. Available from: <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/drug-types/alcohol#Deaths>
4. Manning M, Smith C, Mazerolle P. The societal costs of alcohol misuse in Australia. *Trends & issues in crime and criminal justice*. 2013 Apr 1(454)1-6. Canberra: Australian Institute of Criminology. <https://doi.org/10.52922/ti243731>
5. Snijder M, Lees B, Stearne A, Ward J, Garlick Bock S, Newton N, et al. An ecological model of drug and alcohol use and related harms among Aboriginal and Torres Strait Islander Australians: A systematic review of the literature. *Preventive Medicine Reports*. 2021; 21(101277). <https://doi.org/10.1016/j.pmedr.2020.101277>
6. King M, Smith A, Gracey M. Indigenous health part 2: the underlying causes of the health gap. *The Lancet* [Internet]. 2009 Jul;374(9683):76–85. Available from: <https://pubmed.ncbi.nlm.nih.gov/19577696/>
7. Holland L, Reid N, Hewlett N, Toombs M, Elisara T, Thomson A, et al. Alcohol use in Australia: Countering harm with healing. *Alcohol use in Australia: Countering harm with healing*. 2023 May 1;37:100774–4. doi: [10.1016/j.lanwpc.2023.100774](https://doi.org/10.1016/j.lanwpc.2023.100774)
8. Chen JLJ, Zhang X, Draper ADK, Kaur G, Field E, Boffa J, et al. Alcohol-related injury hospitalisations in relation to alcohol policy changes, Northern Territory, Australia, 2007-2022: A joinpoint regression analysis. *Drug and alcohol review* [Internet]. 2025 Jan;44(1):324–35. Available from: <https://pubmed.ncbi.nlm.nih.gov/39656527/>
9. Menzies School of Health Research. Social and Economic Costs and Harms of Alcohol Consumption in the Northern Territory [Internet]. Darwin: Menzies; 2019 [cited 2025 Dec 6]. Available from: https://www.menzies.edu.au/icms_docs/302326_Final_Report_-_Social_and_Economic_Costs_and_Harms_of_Alcohol_Consumption_in_the_Northern_Territory.pdf
10. Clifford S, Wright CJC, Chikritzhs T, Livingston M. Regional variation in alcohol consumption in the Northern Territory: an update. *Drug Alcohol Rev*. 2026;45(1):e70055. <https://doi.org/10.1111/dar.70055>
11. Tscharke B, Livingston M, Clifford S, Zheng Q, Bade R, O'Brien JW, et al. Changes in wastewater measures of alcohol consumption in Alice Springs, Australia, 1 year after the introduction of restrictions on alcohol sales. *Addiction*. 2025 Nov 30 (early view, pre-publication). <https://doi.org/10.1111/add.70262>

12. Northern Territory Government. Alcohol Policy NT – Data and Evaluation [Internet]. Darwin: NT Government; [cited 2025 Dec 6]. Available from: <https://alcoholpolicy.nt.gov.au/data-and-evaluation>
13. Northern Territory Police, Fire and Emergency Services. *Alice Springs Crime Statistics* [Internet]. Darwin: PFES; [cited 2025 Dec 6]. Available from: <https://pfes.nt.gov.au/police/community-safety/nt-crime-statistics/alice-springs>
14. Central Australian Aboriginal Congress. *Submission re: Alcohol and Other Drugs in Australia* [Internet]. Alice Springs: CAAC; 2024 [cited 2025 Dec 6]. Available from: https://www.caac.org.au/wp-content/uploads/2025/01/2024-12-Congress-submission-re-AOD-in-Australia_FINAL.pdf
15. Northern Territory Government. *Alice Springs Integrated Response to Family and Domestic Violence Project* [Internet]. Darwin: Department of Territory Families, Housing & Communities; [cited 2025 Dec 6]. Available from: <https://families.nt.gov.au/media/documents/tfhc-shared-documents/publications/Alice-Springs-Integrated-Response-to-Family-and-Domestic-Violence-Project-web1.pdf>
16. Central Australian Aboriginal Congress. *Congress Feedback on the Draft NT Domestic, Family and Sexual Violence Prevention & Response Roadmap* [Internet]. Alice Springs: CAAC; 2025 [cited 2025 Dec 6]. Available from: <https://www.caac.org.au/wp-content/uploads/2025/08/2025-08-Congress-feedback-on-the-Draft-NT-DFSV-Prevention-Response-Roadmap.pdf>
17. Australian Institute of Health and Welfare. *Family violence among Aboriginal and Torres Strait Islander peoples: Summary* [Internet]. Canberra: AIHW; [cited 2025 Dec 7]. Available from: <https://www.aihw.gov.au/reports/indigenous-australians/family-violence-indigenous-peoples/summary>
18. Northern Territory Government. *Domestic, Family and Sexual Violence Reduction Framework*. Darwin: NT Government; [cited 2025 Dec 7]. Available from: <https://families.nt.gov.au/media/documents/domestic-violence/Domestic,-Family-and-Sexual-Violence-Reduction-Framework.pdf>