

16 February 2021

Mr Russell Goldflam A/Deputy Chairperson Northern Territory Liquor Commission **GPO Box 1154** Darwin NT 0801

By email: liquor.commission@nt.gov.au

Dear Mr Goldflam and Commissioners,

RE: Variation of conditions of liquor licences – Barkly region

The Aboriginal Medical Services Alliance NT (AMSANT) is the peak body for Aboriginal Community Controlled Health Services (ACCHSs) in the Northern Territory (NT). AMSANT has been established for over 25 years and has a major policy and advocacy role at the NT and national levels. Our 26 members are located right across the NT from Darwin to the most remote areas and includes Anyinginyi Health Aboriginal Corporation. The ACCHSs sector is the largest provider of primary health care to Aboriginal people in the Northern Territory. ACCHSs deliver comprehensive primary health care in an integrated, holistic, culturally secure framework which combines a population health approach with primary health care service delivery; in addition, ACCHSs are also involved in diverse health research activities. AMSANT provides guidance and advocacy on a wide range of research, public health issues, education, workforce, continual quality improvement programs, social and emotional wellbeing, housing and other determinants of health that affect NT Aboriginal people. AMSANT has high level collaborations with the NT and Commonwealth Governments on these issues.

AMSANT also provides support services to our members in a range of areas, including support to Social and Emotional Wellbeing (SEWB) and AOD staff and teams in ACCHSs and those employed by NT Government clinics; and training and support in culturally responsive trauma informed care with a focus on both staff and clients. AMSANT is acutely aware of the links between alcohol and trauma and its pervasive impacts in the broader community and, in turn, amongst clients and staff of ACCHSs.

For decades, AMSANT has been a strong voice for our people in speaking up about the devastating harm caused by alcohol. Too many people, including some of the most vulnerable and disadvantaged members of our community, are affected by alcohol-related harms. AMSANT embraces a social and cultural determinants of health perspective which recognises that health and wellbeing are profoundly affected by a range of interacting economic, social and cultural factors. Accordingly, we advocate for an evidence-based, holistic and community-led approach to alcohol misuse and the subsequent issues it causes in our communities.



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AMSANT has provided numerous submissions on the matter of alcohol policy and legislation over many years. Most recently, AMSANT has been a vocal opponent of the proposed Dan Murphy's megastore liquor outlet in Darwin, based on our decades of advocacy and support for our people and communities in Darwin. Late last year AMSANT also provided evidence to the Senate Community Affairs Committee's hearing for their; *Inquiry into Effective approaches to prevention, diagnosis and support for Fetal Alcohol Spectrum Disorder*.

AMSANT makes this particular submission in support of our member service in the Barkly region, Anyinginyi Health Aboriginal Corporation. AMSANT notes that in their submission dated 23 November 2020, Anyinginyi state that the corporation:

...firmly supports continuing the alcohol restrictions on opening hours and restrictions on quantity of alcohol that can be purchased on a given day. It is the Corporation's view that it may be detrimental to the health and wellbeing of the community to lift or loosen the restrictions.

AMSANT agrees with Anyinginyi that restrictions on opening hours are an effective measure that should remain in place. In our 2017 submission to the *Alcohol Policies and Legislation Review in the NT*ⁱ, AMSANT noted the impact of trading hours on alcohol consumption and harm, referencing studies that show increased trading hours are strongly linked to increased consumption and alcohol-related harm and, conversely, restricted opening hours resulting in reductions in alcohol-related harm. AMSANT made the recommendation to this review that 'restrictions on trading hours, particularly in regard to late-night trading, be considered in consultation with individual communities and centres'ii.

AMSANT has long maintained that reducing alcohol-related harms over time will require both short-term strategies to minimise immediate harm, and long-term strategies to address the broader determinants of alcohol misuse and chronic addiction. Since it was instated in 2016, the NT Government has made up for lost ground with welcome, progressive and – importantly – evidence-based alcohol policy and legislative reforms. AMSANT commends the Liquor Commission in this instance for its consideration of the available data in making its proposed variations on liquor licencing conditions for Tennant Creek and the Barkly.

AMSANT stands behind Anyinginyi in support of the continuation of restrictions on alcohol supply in Tennant Creek and the Barkly region.

Yours sincerely

John Paterson

Chief Executive Officer

ⁱ AMSANT (2017) Submission to the Alcohol Policies and Legislation Review in the NT. Accessed from: http://www.amsant.org.au/wp-content/uploads/2018/06/170719 AMSANT-Submission-to-the-Alcohol-Policies-and-Legislation-Review-in-the-NT.pdf

ii Ibid.