



**The Salvation Army
Australia Southern Territory
Northern Territory Region**

Submission to

**Northern Territory Alcohol Policies and
Legislation Review**

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Introduction

The Salvation Army welcomes the opportunity to make this submission to the Northern Territory Alcohol Policies and Legislation Review. The submission aims to provide a constructive contribution to the consideration of changes to these laws and practices. The Salvation Army applauds the Northern Territory government for consulting widely on the future direction of alcohol policy and legislation, for its commitment to harm minimisation, and to its examination of the evidence in relation to this topic.

About Us

The Salvation Army is an international Christian movement with a presence in more than 130 countries worldwide. As one of the largest providers of social services and programs in Australia, we interact with people from all walks of life, including the most marginalised and excluded in society. We share our community's belief in a 'fair go' for all, which grounds our commitment to social justice and a particular interest in the health and wellbeing of people who are the most vulnerable members of our society.

The Salvation Army Australia Southern Territory (Northern Territory, Western Australia, South Australia, Victoria and Tasmania) provides a diversity of services including aged care, family support, out of home care, accommodation and homeless services, disability services, emergency disaster responses, employment services as well as financial assistance and counselling. Managing a total of 52 Alcohol and Other Drugs (AOD) services and programs across the Australia Southern Territory, The Salvation Army endorses a harm minimisation approach to AOD. Services and programs include residential rehabilitation, home based, community and residential withdrawal (detox) facilities, counselling, aftercare, outreach services, sober up facilities, needle syringe programs, AOD supported accommodation services and primary health services.

The Salvation Army Northern Territory Region

The Salvation Army Northern Territory Region currently provides a range of social services which give close up insight into the impact of alcohol use and misuse on Territorians. These services include, but are not limited to:

- Drug and Alcohol Services Top End (located at The Sunrise Centre in Darwin) which provides a 22 bed AOD residential rehabilitation and 3 bed AOD residential withdrawal unit. Services include a day program for up to four clients and AOD Aftercare.
- 'Men Taking Control', a unique day program with strong links to the homeless hostel in Alice Springs. The program provides AOD treatment, case management and support for up to seven participants at any given time.
- A range of homelessness, family violence and emergency relief services, which provide added insight into the impact of alcohol related issues.

Background

The Salvation Army recognises that the consumption of alcohol, when undertaken in a safe and responsible way, can be a pleasurable social activity for many Territorians. We also recognise that the hospitality industry and tourism in general contribute much to the Northern Territory economy. However, our work and programs have led us to understand

that effective regulation and legislation in this area is necessary, based on clear evidence of the scale and extent of human and societal costs of alcohol misuse. A recent study by Manning, Smith and Mazerolle¹ has comprehensively addressed the harms and societal costs of alcohol abuse in Australia. The human costs include “individual health issues, lower life expectancy, reduced productivity in the workforce and absenteeism, accidents, violence and other alcohol-related offences including public nuisance offences, as well as drink-driving”. The overall argument by Manning et al. is that “assessing the harms associated with alcohol misuse is critical to developing good policy”. We also note that the rate at which Territorians consume alcohol, in a way that increases both the short term risk of harm and the risk of long term harm, is greater than that in the overall population of Australia. The overarching position of The Salvation Army is that it supports policy and practices that clearly promote the responsible use of alcohol and minimise the harm resulting from harmful alcohol use, particularly in relation to those who are most marginalised in society.

Key Issues

The Salvation Army supports a strong and coherent preventative approach to addressing the hazardous consumption of alcohol. The introduction of a range of evidence informed strategies that address excessive and hazardous alcohol consumption, although potentially politically unpopular, are necessary to reduce the resulting health related harm, offending and antisocial behaviour, as well as the marginalisation from society that many individuals facing problematic alcohol misuse experience.

The Salvation Army believe the following are among the strategies which would be helpful in reducing alcohol related harm.

Trading Restrictions

Restricted trading hours for both on and off license premises

As recommended by leading Australian researchers such as Professor Robin Room² and Associate Professor Peter Miller, the imposing of restrictions on the sale of alcohol is supported by The Salvation Army. Associate Professor Peter Miller’s research into *Patron Offending and Intoxication in Night Time Entertainment Districts*³, highlights the fact that a substantial number of people are heavily intoxicated at night, particularly after 1am and recommends the imposing of trading hour restrictions. If these restrictions are applied consistently across regions, businesses can still compete fairly, while minimising harm. The Salvation Army also supports the restriction of trading hours for both on and off license premises.

¹ Manning, M. Smith, S. Mazerolle, P. (2013) – The societal costs of alcohol misuse in Australia- Australian Government Australian Institute of Criminology Trends and Issues in Crime and Criminal Justice No 454.

² Stokes, K. (2013). *Professor Robin Room’s recommendations to curb Australia’s alcohol consumption*. The Adelaide Advertiser. Retrieved from <http://www.news.com.au/lifestyle/food/professor-robin-rooms-recommendations-to-curb-australias-alcohol-consumption/story-fneuz92c-1226637880548#ixzz2SqfXFhgk>

³ Miller, P., Pennay, P., Droste, N., Jenkinson, R., Quinn, B., Chikritzhs, T., . . . Lubman, D. (2013). *Patron Offending and Intoxication in Night-time Entertainment Districts*. Monograph Series No. 46. Canberra: National Drug Law Enforcement Research Fund.

Reduction in number of outlets

In the Northern Territory, there is a liquor license for every 353 adults.⁴ The Salvation Army strongly believes that this over accessibility contributes to problematic alcohol use in the Territory. We call on government to extend the current moratorium on granting new take away liquor licenses to include new on-licence premises as well.

Research supports the reduction of alcohol outlets in reducing alcohol related harms. An increase in both on-premise and off-premise outlets makes alcohol more accessible and potentially encourages the discounting of alcohol.⁵

Risk-based licensing measures

Liquor licenses in the Northern Territory are cheaper than anywhere else in Australia, despite the disproportionate level of alcohol related harm suffered in the Territory. The Salvation Army strongly advocates an increase in the current application fee of \$200 and the introduction of further annual fees, which currently do not apply at all in the Northern Territory. Further, The Salvation Army advocates the introduction of additional levies proportionate to risk factors for any given venue. Such factors may include; trading hours, patron capacity and venue type.

Alcohol Home Delivery Service

The Salvation Army is deeply concerned about the availability of alcohol home delivery services in the Northern Territory. This service provides increased access to some of the most vulnerable Territorians. We strongly advocate that licensing should either forbid or strictly limit the circumstances under which alcohol can be home delivered.

Pricing Regulations

Introduction of minimum pricing per standard drink

Alcohol consumption levels, including by underage drinkers, are impacted by price.⁶ Setting a minimum price 'per standard drink' would make an immediate impact on consumption while simultaneously addressing some of the issues related to promotions (see below) and practices such as selling alcohol below cost price in a bid to attract other business.

Restrict allowable promotions and advertising

A number of studies have demonstrated a strong association between exposure to alcohol advertising and promotions, and subsequent consumption. Alcohol advertising influences both the age at which young people start drinking and their levels of consumption, and whether or not they had consumed alcohol in the past 30 days.^{7 8 9}

⁴ Based on the number of licensed premises as at 8 July 2016 and the NT population of 180,970 aged 18 and over at 30 June 2015 [Australian Bureau of Statistics (2016) *3101.0 - Australian demographic statistics, Dec 2015*. Population by age and sex tables]

⁵ Livingston, M., Chikritzhs, T., & Room, R. (2007). Changing the density of alcohol outlets to reduce alcohol-related problems. *Drug and Alcohol Review*, 26, 557-566.

⁶ Wagenaar AC, Salois MJ and Komro KA (2009) Effects of beverage alcohol price and tax levels on drinking: a meta-analysis of 1003 estimates from 112 studies. *Addiction* 104: 179-190

⁷ Anderson, P., De Bruijn, A., Angus, K., Gordon, R., & Hastings, G. (2009). Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol and Alcoholism* 44, pp. 229-43.

The Salvation Army supports regulations that would ban ‘two for one offers’, bulk buying of alcohol and other alcohol promotions based on discount pricing. Additionally, levies on packaged liquor are recommended, as research shows that price increases can reduce alcohol consumption.¹⁰

Advocacy for volumetric taxing on wine

The Salvation Army is concerned that the federal government continues to tax wine according to price rather than volume of alcohol. We would like to see volumetric taxing applied to wine as it is to beer and spirits. This measure would also assist in increasing the minimum price per standard drink (see above).

While The Salvation Army understands that taxation is a federal issue, we implore the Northern Territory government to advocate to the Commonwealth for volumetric taxing as part of the Territory’s overall alcohol strategy.

Treatment and Early Intervention

Increase treatment capacity

The Salvation Army commends the Northern Territory Government for increased voluntary treatment capacity, particularly for residential services. However, we believe that this vital component of any alcohol policy response needs to be further expanded. Diverse options should be readily available to those seeking treatment and their families. Options should include residential, non-residential and day programs as well as services for families. Programs should have high standards in regard to cultural sensitivity and, where possible be developed by or in close and genuine consultation with Aboriginal and Torres Strait Islander peoples.

Increase capacity to respond by primary healthcare providers

Primary health providers can play a major role in reducing alcohol related harm. The Salvation Army strongly advocates that services be established which particularly target groups at risk of experiencing alcohol related harm. The building of capacity within current health providers to identify and respond to alcohol misuse is also vital. This is seen as particularly important in relation to GPs, anti and post-natal care services and Maternal and Child Health nurses. Programs within these professional groups should be aimed at the prevention of and early intervention in Fetal Alcohol Spectrum Disorders, the reduction of harm for those misusing alcohol and support for families experiencing alcohol related family violence.

⁸ Jones, S. & Magee, C. (2011). Exposure to alcohol advertising and alcohol consumption among Australian adolescents. *Alcohol and Alcoholism*. 46(5):630-637

⁹ de Bruijn A, et al. (2012). *Report on the impact of European alcohol marketing exposure on youth alcohol expectancies and youth drinking*. AMPHORA

¹⁰ Wagenaar, A., Maldonado-Molina, M. & Wagenaar, B. (2009). Effects of alcohol tax increases on alcohol-related disease mortality in Alaska: Time-series analyses from 1976 to 2004, *American Journal of Public Health* 99: 1464-70.

Conclusion

The aim of changes to laws and practices relating to the sale and consumption of alcohol should be guided by an effective public health approach in the reduction of excessive and harmful drinking and resulting antisocial and destructive behaviours as well as high human and societal costs. This requires a comprehensive range of measures including those outlined above.

The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance.