



Local Government Association of the Northern Territory

LGANT Submission to the Northern Territory Alcohol Policies and Legislation Review

Via email to: Alcohol.Review@nt.gov.au

Date of submission: 10 July 2017

1. About This Submission

This submission is made in response to government's call for responses to its Northern Territory Alcohol Policies and Legislation Review. The LGANT Executive:

-) met with members of the Expert Panel undertaking the review
-) approved the submission at its meeting on ...

The submission provides responses to many of the questions raised in the review paper as suggested areas for comment. These now follow.

2. General Matters

2.1 ***What do you think of the current approaches to reducing harms from alcohol, and what other strategies could be considered?***

LGANT supports the current approaches to reducing harms from alcohol as outlined in the review paper. While they have an emphasis on preventive and treatments services LGANT would like additional strategies to be considered particularly with alerting people to information that is now online and perhaps supported by:

-) television advertisements like those done under the previous *Living with Alcohol* program
-) information that is in languages other than English
-) reviews and evaluations as to their effectiveness.

LGANT considers more could be done to raise awareness about the harms of alcohol through educational means, particularly in areas where online services are a relatively recent phenomenon.

LGANT also supports alcohol reduction strategies at point of sale, in other words, it would like restrictions on the availability of takeaway alcohol because of its greater potential to lead to uncontrolled consumption and then harm.

LGANT favours the government reducing the number of outlets that can sell takeaway alcohol, and where this is not practical, for some premises it supports measures that can bring restrictions into force under the banner of alcohol management plans. This might also lead to restrictions being implemented for some groups or even types of events.

2.2 ***What do you think of the current approaches to reducing demand for alcohol, and what other strategies could be considered?***

LGANT supports the current approaches to reducing demand for alcohol as outlined in the review paper. LGANT also supports strategies:

-) in 2.1 for reducing the demand for alcohol
-) alcohol management plans and action initiatives having more legislative support through regulation so there is less incentive for people or organisations to ignore

them if they wish and there is more rigour and structure to bring about their implementation.

2.3 What strategies and approaches can be taken to promote cultural change in relation to drinking behaviours to influence community norms to more responsible drinking; and to develop community support for such change?

LGANT sees much of this effort being made:

-) through comprehensive education programs
-) by enforcing liquor licence conditions in respect of the responsible serving of alcohol on licenced premises
-) by ensuring alcohol management plans are given support and resources to be implemented and evaluated.

While there is a plethora of online educative material available now on the subject of responsible drinking its existence needs to be made more known if there is to be cultural change in drinking behaviours.

2.4 Should there be a distinction between demand, supply and harm reduction strategies that target 'at risk' groups such as young people, or is a general community approach more appropriate?

LGANT considers both approaches are worthwhile for all groups. Care needs to be taken with strategies that target specific groups because if they are led to believe they are the only ones with the 'at risk problem' they are likely to balk at messages that advocate change.

2.5 Should treatment services be regularly reviewed and if so how frequently and what matters should be considered?

LGANT contends that there needs to be strong planning rigour with programs so that:

-) evidence
-) theory of change
-) activity plan
-) evaluation plan
-) outcomes

are all recorded and eventually evaluated. The 'program logic' behind many government programs is heading this way and they have to because generally:

-) treatment programs are expensive to run
-) everyone wants value for money
-) if services are not achieving outcomes they are likely to not receive funding in the future.

3. Reducing Alcohol Fuelled Crime with Evidence Based Policies

3.1 *What are the best approaches to reducing alcohol-fuelled violence at and around on-premise venues?*

LGANT agrees with the usual compilation of approaches mentioned in reports on this matter including:

-) the responsible serving of alcohol
-) adequate on-site security that can vet persons entering premises and see those off that are asked to leave due to their bad behaviour or perceived level of intoxication
-) police officers being on hand or nearby to deal with the violence
-) licensing inspectors being on-site to observe and record evidence of any breaches of licence conditions
-) licencees of high risk premises paying additional taxes to support the cost of these approaches.

However, if violence continues to occur at or around these venues (despite all or most of the above being in place) then other approaches should be considered including premises having to close early (a measure which appears to have lessened incidences of violence in the cities of Newcastle and Sydney).

4. Safe and Vibrant Entertainment Precincts

4.1 *Are the current voluntary accords working? Should the accords be mandated and what should be in them?*

LGANT acknowledges some accords are working well solely on the good will of the parties. Accords however, are vulnerable to change because of their voluntary construct. For this reason LGANT favours them being mandated so that practices that are working are not abandoned because of changes in:

-) personalities amongst the parties or
-) ownership of premises.

4.2 *How can the key stakeholders – government, police, councils and businesses work together more effectively?*

LGANT supports there being a continuation of alcohol management plans throughout the Northern Territory that are governed by local committees who are made up of the above stakeholders. There needs to be strong governance arrangements implicit in the operations of these committees if they are to be effective in dealing with alcohol management plans.

5. Alcohol Service Provision and Management in Remote Aboriginal Communities

5.1 *What impacts have the restrictions of alcohol in communities and town camps had on improving community safety?*

LGANT considers some residents in communities would argue that the restrictions are necessary and have had positive effects in either largely eliminating harms caused by alcohol abuse or at least keeping them at a level where a community is considered for the most part, safe. Some communities have had prohibition restrictions for decades.

While it is easy to point to incidences of when such restrictions are breached (as a basis for arguing they do not work) it is equally worth noting the considerable periods of time when such communities have enjoyed peace and community safety due to them being in place. The periods of safety far outweigh those of the breaches; evidence that the NT Police Force could well confirm for some communities.

5.2 *Has there been an increase in secondary supply of alcohol to remote communities and is it possible to establish an evidence-based link to what may have caused an identifiable increase?*

LGANT considers it is difficult to determine if there has been an increase in the secondary supply of alcohol to remote communities and that perhaps the only party that could again provide evidence about such matters is NT Police based on their capture of such supplies.

The secondary supply of alcohol will always occur from time to time where there are supply restrictions in place in much the same way as happens for products (such as illicit drugs) that are also restricted/prohibited.

5.3 *Has the permit system contributed to responsible drinking on communities?*

LGANT considers that the permit system has contributed to responsible drinking on communities by:

-) forcing drinkers to comply with the conditions of their permits (a breach may lead to them losing it)
-) consuming their alcohol generally in their households and only allowing other people with permits to drink there as well (and therefore generally not infringing on others)
-) providing councils and communities with the choice of recommending the withdrawal or rejection of a permit for a person known not to drink responsibly.

5.4 *What could be the role of the Director-General of Licensing and other agencies in facilitating or approving local or regional plans?*

LGANT considers the Director-General of Licensing should provide a leadership role in assisting local committees (see 4.2) to not only develop local or regional alcohol management plans but also to settle on suitable governance arrangements and to report

on committee progress and outcomes. Resource support for local committees also needs to be provided.

6. Density and Size of Liquor Outlets

6.1 Are there too many liquor licences in the Territory? If so, how should they be reduced in number?

LGANT considers that there are too many liquor licences in the Northern Territory; one for every 466 persons (240 000/515). If there is to be reduction in harm caused by alcohol misuse one measure to take is to have restrictions placed on the availability of alcohol and that includes liquor licences.

One way to reduce the number of takeaway licences would be for the government to buy them back when they are being sold and to not re-issue them for the same premise.

The government should also explore the policy option of not allowing new takeaway licences in some local government areas.

6.2 Should further limitations be placed on venues licenced to sell takeaway alcohol?

Limitations need to be imposed on these venues because it is takeaway alcohol that often leads to the most harm. In licenced premises there is at least some measure of control.

Some venues may not need any limitations while others might need to have their limitations either recorded in their licences or imposed through local or regional management plans.

7. Liquor Licensing, Supply of Alcohol and the *Liquor Act*

7.1 Does the current process for advertising licence applications provide sufficient information to enable the public to respond?

LGANT considers the Director-General of Licensing should be required under legislation to provide automatic referrals to councils on all licence applications and not simply to place advertisements in newspapers which are fast becoming obsolete.

It would be useful if councils and the public were given details of the number, location and different categories of liquor licences in the local government area with each licence application so they can be better informed about licences generally. This information should be provided as a matter of course to respondents.

Council open space areas are often impacted on due to alcohol misuse. Councils also need:

-) adequate time in which to research the impacts of new licence applications
-) to make decisions about licence applications at council meetings (which generally only occur monthly and for regional councils are every two months).

The current 30 day period in which a person can lodge a submission is inadequate for licences that are issued in perpetuity whereas it is probably satisfactory for limited licences.

7.2 *Does the lack of defined categories of licence inhibit the ability of members of the public or organisations to submit meaningful objections to applications?*

LGANT contends that defined categories of licences would be more useful to members of the public when considering submitting meaningful objections to applications. Defined categories of licences might also reduce the number of objections in some cases because members of the public can be more informed about the nature and conditions of licences if they are better defined. For example, some people will be more concerned about takeaway licences than restaurant licences.

7.3 *Should standard conditions apply to clearly defined licence categories?*

LGANT supports standard conditions applying to defined licence categories because it gives certainty to both licencees and the public as to what is required for particular categories. Standard conditions need also make reference to alcohol management plans so that there is a regulatory link between licences and plans.

7.4 *Should licences continue to be issued in perpetuity or should they be issued for a defined period? If so, what period?*

LGANT contends that limited licence categories should obviously be for defined periods whereas on-premise licences would have to be lengthy to be commercially viable.

7.5 *Should there be a system of annual or periodic fees?*

LGANT supports the payment of annual liquor licence fees as are paid in other States and overseas. The revenue gained from such fees could offset some of costs that both the Northern Territory Government and councils incur in having to deal with the adverse impacts of alcohol misuse.

7.6 *Should licence fees be calculated on a risk-based model or some other model?*

LGANT supports progressive licence fees being calculated on a risk-based model as occurs in other States and overseas. The rationales for imposing fees in this way are listed on the Internet and no doubt have relevance in the Northern Territory.

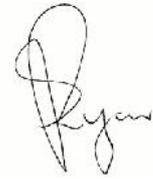
7.7 *Should the NTG maintain its position in support of the introduction of volumetric tax by the Commonwealth to decrease the price of low alcohol beer and increase the price of low cost high alcohol products?*

LGANT supports the NTG position because of the potential adverse impacts on communities caused by the sale of such products including that relating to the environment with waste.

7.8 *Are the current span of hours during which takeaway outlets operate appropriate or should they be reduced?*

LGANT supports takeaway outlets operating for a span of hours similar to those in other States.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ryan', is centered on the page. The signature is written in a cursive style with a large initial 'R'.

Mayor Damien Ryan
President