



27th February 2007

Liquor Review Team
DSD
Lighthouse Building
1 Cromac Place
Gasworks Business Park
Ormeau Road
BELFAST
BT7 2JB

Dear Sir/Madam

**Re: DRAFT LICENSING AND REGISTRATION OF CLUBS
(AMENDMENT) (NORTHERN IRELAND) ORDER 2007**

The Eastern Drugs and Alcohol Co-ordination Team (EDACT) is a multi agency partnership with responsibility to support the implementation of the New Strategic Direction on Alcohol and Drugs (DHSSPS 2006) at Eastern Health and Social Services Board level. The Team works with a wide range of agencies and community organisations to tackle drug and alcohol misuse in a manner appropriate to local needs and situations. EDACT welcomed the opportunity to respond to the consultation document in January 2006 to consider the proposed changes.

The draft legislation is now available and the Department for Social Development has asked for responses to this. It must be stated that EDACT remains very concerned about the proposed extension of opening times to 2.00 am for the following reasons.

1. The extension of opening hours to 2.00 am will not do anything to eliminate the problem of large numbers of people coming on to the streets all at once. This proposal will lead to further increased pressures on: -
 - Local hospital services (particularly A&E resources)
 - Quality of life for local residents
 - Ambulance and other emergency services with obvious financial implications for the agencies concerned.

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2. The report for the Northern Ireland Licensing Review Team summarising the results of the Survey of District Commanders, Regional Headquarters and Criminal Justice Department's Community Safety Branch stated as one of its key findings;

"Further relaxation of the licensing laws could lead to increased burdens for the police and any extension of licensing hours may lead to more anti-social behaviour, more arrests and ultimately fewer police officers on the streets"(Oct 2004)

3. The Department of Social Developments Review of the Literature on the impact of licensing and other controls on the consumption of Alcohol stated in point 6 of its findings;

"In terms of the general restriction of alcohol consumption, it is suggested that there is evidence to support the idea that longer hours of alcohol sales may be linked to increased problems with alcohol related crime and disorder, although the evidence is mixed on this issue. Studies have also suggested that staggered closing times may have an impact on disorder."

4. Chikritzhs T and Stockwell T (2002) examined the impact of extended trading hours in Western Australia. They found that the effect of extending trading hours in Perth by one hour at the weekends resulted in a 70% mean increase in violent assault.
5. A recent article by Plant et al in the International Journal of Drug Policy (2005) found that increasing the availability of alcohol invariably leads to an increase in consumption and consequently harm. This has been borne out by international experience. Any increase in availability needs to bear this in mind.
6. A recent study by the University of London (Queen Mary College) found that binge drinking is responsible for 56% of all violence within the UK. Extending the licensing hours will only increase the amount of binge drinking and subsequent harms.

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7. In Northern Ireland we are currently struggling with high levels of binge drinking, accidents and road deaths associated with people under the influence of alcohol, and high levels of work absenteeism. Increasing licensing hours during the week will only add to these problems. With opening hours to 2 am on all weekdays there will be more people over the drink-driving limit attempting to drive to work in the mornings. Increased availability means an increase in alcohol-related problems.
8. The establishment of a terminal hour will not give local authorities the flexibility to address local licensing needs. The system for staggering closing times is in place in Scotland and urgently needs to be considered.
9. EDACT is aware that the proposal to extend opening hours to 2am was also opposed by the other three Drug and Alcohol Coordination Team's, and the four Health and Social Service Boards. Furthermore, the proposal and in particular the aspect of setting a fixed terminal hour is a major concern for both the PSNI and District Councils in relation to managing late night disorder in town centers and with licensed premises in residential areas.
10. The HSSB's are required under DHSSPSNI Priorities for Action to reduce the proportion of adult drinkers (18-75) who binge drink by 2008. Such a target may well become impossible if opening hours are increased as research has borne out consumption will increase with increased availability.
11. Finally, the recent report by Advisory Council on the Misuse of Drugs "Pathways to Problems: Hazardous use of tobacco, alcohol and other drugs by young people in the UK and its implications for policy" (Sept 2006) stated

"Of all drugs, the use of alcohol has shown the greatest recent growth and causes the most widespread problems among young people in the UK today. It is also the least regulated and the most heavily marketed."

EDACT would urge that this proposal is urgently reviewed in light of the above points.

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Counting the cost

Information from the Health Promotion Agency states that “In Northern Ireland 20% of the population are drinking above sensible drinking levels and the significant cost from excess alcohol consumption has been estimated at more than £800 million per year. This estimate includes costs to the individual in terms of risk to health, accidents, depression or premature death with more than 730 deaths per annum are attributed to alcohol but also effects on the family, and society in terms of the burden to health and social services, costs of policing and criminal justice arising from related violence and crime, and the cost to employers from absenteeism. Binge drinking is particularly prevalent especially among men, and is increasing among young adults (18-35), especially young women. According to availability theory, increasing the availability of alcohol will lead to increased consumption. “ (HPA response to liquor licensing review, Jan 06)

Exceptional permitted hours

EDACT welcomes the proposals for extended opening hours for special occasions such as major sporting events or other special circumstances. However, we are of the opinion that these should be well controlled and that there should be a limit to the number of “special openings” that a licensed premises could be granted each year.

Children’s Certificates

EDACT is also supportive of the Children’s Certificates and the proposal to relax conditions in relation to children on licensed premises for family events such as weddings, as long as they are held in private/separate function rooms. However it must be emphasized that in the past there was not proper enforcement of Children’s Certificates and this is absolutely essential for the protection of our children and young people.

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Conclusion

It must be accepted that some of the proposed new legislation will give more structure and controls over licensed premises and, if strictly enforced, would be welcomed.

However, the increase in licensing hours as presented in the new legislation will serve no useful purpose other than to increase availability of alcohol. This in turn will increase alcohol-related problems and will be detrimental to the promotion of public health. Under the New Strategic Direction for Alcohol and Drugs 2006-2011 (DHSSPSNI) there is an emphasis on decreasing the harm caused to both individuals and society from alcohol consumption and this will not be realised with an increase in licensing hours.

Yours sincerely

GARY McMICHAEL
Chairperson