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## Promoting a Smoke-free Environment

File Ref: 67/110

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Dear Sir/Madam

### Draft Licensing & Registration of Clubs (Amendment) (Northern Ireland) Order 2007

Thank you for inviting the NHSSB (Northern Board) to provide comments on this draft legislation.

Further to my response of 24 January 2006 on the Liquor Licensing Consultation, I remain very concerned that DSD are continuing with the proposal to provide for an extension of opening hours for registered clubs and eligible licensed premises up to 2am, Monday to Saturday (and beyond in exceptional circumstances), despite my and a wide range of other's objections in the original consultation.

I continue to welcome the addition of the "Promotion of Public Health" in the licensing objectives, as a basis for policy, legislation and regulatory procedures; however, this is being contradicted by this proposal which will have adverse consequences for Public Health.

The extension of opening hours to 2am 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 and resource implications for these and other agencies due to the problem of large numbers of people coming on to the streets all at once at an even later time.

A review of the following relevant research strongly suggests that extended opening hours will increase the availability and consumption of alcohol leading to adverse physical and mental health consequences for Northern Ireland's population.

1. 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)*

2. 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."*

3. 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.
4. 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.
5. 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

6. 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 2am 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.
7. The Northern Board is 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.
8. 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."*

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

## **Conclusion**

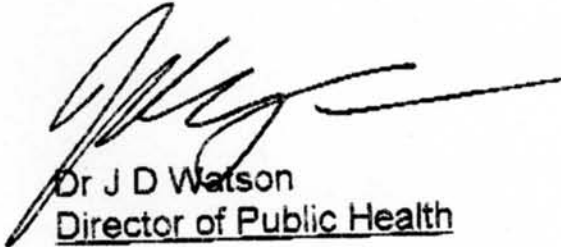
I accept that some of the proposed new legislation will give more structure and controls over licensed premises and, if strictly enforced, would be welcomed.

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.

Within 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.

I am aware that colleagues in other Health and Social Services Boards / Drug and Alcohol Co-Ordination Teams have made similar comments.

Yours sincerely



Dr J D Watson  
Director of Public Health