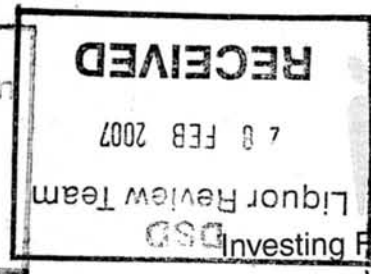


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23 February 2007

Dear Sir/Madam

Re: Proposed Extension of Licensing Hours

The Western Health and Social Services Board (WHSSB) welcomes the opportunity to respond to the consultation and the proposed changes in licensing hours.

The WHSSB worked in partnership with the Western Drug and Alcohol Coordination Team (WDACT) to lead on a response to this consultation. The WDACT is multi agency partnerships with responsibility to support the implementation of the New Strategic Direction on Alcohol and Drugs (DHSSPS 2006) drug and alcohol policy at Health and Social Service Board level. The team works with a wide range of statutory agencies and community organisations to tackle drug and alcohol misuse in a manner appropriate to local needs and situations.

WHSSB had responded to the initial consultation, which was led by the Department of Social Development (DSD). DSD have now published the draft legislation and are seeking a response to the content. It must be stated that many of the objections and concerns that were raised during the initial consultation process have not been addressed.

WHSSB would like to take this opportunity to directly respond to the amendments proposed in the current Draft Licensing and Registration of

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Clubs (Amendment) (NI) Order 2007 in particular to proposed extension of opening hours, establishment of a terminal hour, awarding of exceptional permitted hours and Children's Certificates.

Proposed extension of opening times to 2am

The WHSSB has already expressed its opposition to this proposal. The extension of opening hours to 2 o'clock 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.

The reasons for an extension are unclear in the consultation document.

From a research perspective a number of key studies have examined the linkage between alcohol availability, consumption and linkages to social well-being. Some of the key reports are;

- 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.
- 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.
- 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

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 week days 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.

Irrespective of whether opening hours should be extended, varying the opening hours in areas of high density should be an option where problems exist, this issue appears to have been overlooked in the draft proposals.

Establishment of a terminal hour

This proposal will not give local authorities the flexibility to address local licensing needs and manage of public order issues. This system is in place in Scotland and public health officials amongst many others are calling for an urgent review of the policy.

This Board is totally opposed to the proposal to extend opening hours to 2am. Furthermore, the proposal and in particular the aspect of setting "an across the board" terminal hour is a major concern for our colleagues in other agencies such as the PSNI and District Councils, this poses a major challenge in relation to managing late night disorder in town centers and with licensed premises in residential areas.

In terms of research 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)

The WHSSB supports the DHSSPSNI Priorities for Action to reduce the proportion of adult drinkers (18-75) who binge drink by 5% by 2010. Such a target may well become impossible if as research has borne out consumption will increase with increased availability.

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."

The WIFH would urge that this proposal be dropped in reviewed in the light of the above evidence and concerns.

Exceptional permitted hours

The WHSSB 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

In relation to this proposal the WHSSB is 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, we would emphasize 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. It maybe useful if the enforcement of this regulation should be considered under the wider remit of Environmental Health Departments of Local Authorities, linked to existing requirements and new responsibilities being proposed under the Smoking Legislation form 30 April 2007.

Conclusion

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

However, the increase in licensing hours and establishment of a "terminal" hour 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 policies in NI.

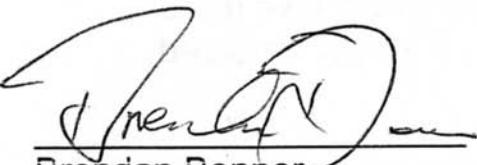
The proposals as outlined directly contradict some of the key Government strategies that seek to decrease the harm that alcohol consumption has on individuals, the community and wider society. Strategies such as:

- Investing for Health Strategy 2002 (DHSSPSNI)
- New Strategic Direction for Alcohol and Drugs 2006-2011 (DHSSPSNI)
- Neighbourhood Renewal 2005 (DSD)
- Lifetime Opportunities – Anti Poverty and Social Inclusion Strategy (OFMDFM)
- NI Suicide Prevention Strategy – Protect Life (DHSSPSNI)

The above strategies seek to change the lifestyle behaviours of individuals and communities so as to overcome many of the elements that cause premature death, harm, violence, ill-health and social exclusion in our society. Alcohol, the ease of access and subsequent misuse is a common factor in many of the problems that agencies and communities are having to face in the delivery of such initiatives.

The WHSSB does welcome proposed changes in terms of exceptional permitted hours and an overhaul of Children's Certificates. Both reviews must be set in a well controlled and regulated environment that will ensure the spirit of the occasion and adherence to the law are being addressed.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Brendan Bonner', written over a horizontal line.

Brendan Bonner
WIFH Manager