



The Royal Australasian
College of Physicians

From the President

15 January 2016

Consumer and Business Services
Attorney-General's Department
Government of South Australia
GPO Box 1719
Adelaide SA 5001

Via Email: CBSReforms@sa.gov.au

Dear Sir/Madam

RACP response to Liquor Licensing discussion paper

The Royal Australasian College of Physicians (RACP) welcomes the opportunity to respond to the Liquor Licensing discussion paper released by the South Australia government's Consumer and Business Services.

We understand that, as expressed in its discussion paper, the Consumer and Business Services is seeking to overhaul South Australian liquor licensing laws in order to 'promote greater flexibility and encourage entrepreneurs to emerge with new business models'. At the same time, it is also seeking suggestions to create a 'safer drinking culture'. While these two objectives are not mutually exclusive, we strongly caution that excessive pursuit of the first objective does not undermine or bring about changes to the detriment of the second.

Physicians know first-hand the harms that alcohol can cause – from their professional experience working in Australia's addiction clinics, emergency departments, orthopaedic wards, rehabilitation centres, liver clinics and cancer wards. The many harms of alcohol and their costs to individuals and the community are both undisputed and substantial, with alcohol consumption being a causal factor in more than 200 disease and injury conditions.¹ One in eight deaths of 25 year olds in Australia is due to alcohol consumption.²

The evidence clearly shows that policies restricting the, often too easy, access to alcohol for sale - whether in the form of trading hour restrictions or limiting the density of licensed outlets - can significantly reduce levels of alcohol consumption and

1 WHO alcohol fact sheet, accessible at <http://www.who.int/mediacentre/factsheets/fs349/en/>.

2 Australian National Council on Drugs, *Alcohol Action Plan*.

therefore its associated harms³. Conversely increasing its physical availability can increase the level of alcohol-related harms.⁴

In light of this evidence we would recommend against any changes to the licensing laws that make it easier to establish off or on licence outlets, that support increased density of outlets, or that allow the expansion of their operating hours.

While we understand the desire of the government to facilitate a more 'vibrant' entertainment environment, liberalising liquor licensing laws to achieve this can constitute a false economy. Increased hospitalisations, policing and the impact on the justice system due to alcohol-related harms impose significant costs on communities and can easily outweigh other potential benefits.

We are also concerned that the discussion paper appears to support the premise that there is too much 'red tape' surrounding liquor licensing. Undue and unnecessary bureaucracy should indeed be removed, however this cannot be assumed to be the case here. There is a clear need for local government to be empowered and encouraged to develop relevant and effective supply reduction measures appropriate for their locale and their residents. These should include the ability to challenge inappropriate applications for liquor licences, constrain trading hours or implement caps on the number of licensed premises allowed in a local area. The needs of the community should not be overridden by the desire by business to increase their flexibility and autonomy.

We appreciate the opportunity to provide a submission to this consultation and trust that Consumer and Business Services will carefully consider our views.

Yours faithfully

A handwritten signature in black ink that reads "Side talk". The signature is written in a cursive, slightly slanted style. The word "Side" is written above "talk". There are some loops and flourishes at the end of the signature.

Laureate Professor Nicholas J Talley

³ Jones, C Kypri K, Moffatt S, Borzycki C, Price B. The impact of restricted alcohol availability on alcohol-related violence in Newcastle, NSW. *Crime and Justice Bulletin*. No. 137; 2009; Kypri K, McElduff P, Miller P. Restrictions in pub closing times and lockouts in Newcastle, Australia 5 years on. *Drug Alcohol Rev* 2014 May;33(3):323–326; Menéndez P, Weatherburn D, Kypri K, Fitzgerald J. Lockouts and last drinks: the impact of the January 2014 liquor licence reforms on assaults in NSW, Australia. *Crime and Justice Bulletin*. No. 83; April 2015.

⁴ Chikritzhs P, Catalano P, Pascal R, Henrickson N. Predicting alcohol-related harms from licensed density: a feasibility study. Hobart: National Drug Law Enforcement Research Fund: 2007; Donnelley N et al. Liquor outlet concentrations and alcohol-related neighbourhood problems. Sydney: Bureau of Crime Statistics and Research, Sydney; 2006; Gruenewald P. Ecological models of alcohol outlets and violent assaults: crime potentials and geospatial analysis. *Addiction* 2006;101(5):666–677.