

Preamble

Spanning 2013-2015, Council undertook extensive community engagement and held stakeholder forums to create a shared response to public intoxication and alcohol harms adversely impacting the municipality. In May 2016, the Safer Vibrant Darwin Plan 2016-2019 (The Plan) was launched in partnership with 35 stakeholders to guide a unified and collaborative approach to addressing the impact of alcohol harms on community life.

The comprehensive Plan provides a strategic and operational framework for Council's approach to addressing public intoxication in the context of community safety over four years in partnership with the community and stakeholders.

The Plan includes advocacy by Council across key change areas, in recognition that no single authority has the mandate or capability to effectively respond to alcohol harms impacting community life, and that community change requires leadership, resolve and collaboration.

The key platforms detailed in this submission are lifted from the Safer Vibrant Darwin Plan 2016-2019 and were echoed across the two stakeholder forums, a review of evidenced based policy and the extensive community engagement informed by over 700 people locally from a diversity of ages, locations and circumstances.

It is evident that prevention, early intervention, purposeful structuring of systems and people to work collaboratively across sectors coupled with the capability to measure impact is vital to affecting change in the alcohol story for Darwin and the Northern Territory.

Turning down alcohol supply, not off

- *There are currently 281 operational liquor licenses in the Darwin municipality¹.*
- *As a community, the need to coexist with alcohol in a more balanced way that better leverages from the vibrancy and benefits a robust entertainment and hospitality economy is evident.*
- *Alcohol is no ordinary commodity hence the requirement to be licensed to sell, signposts a need for careful consideration of its availability and the impact of subsequent access. This need is underscored for the cohorts of people who are vulnerable to alcohol misuse and the widespread associated harms. A plethora of evidence exists that demonstrates the depth and breadth of the adverse impacts of alcohol harms in the Northern Territory with more than 3000 people annually, victims of alcohol related violence alone and 1 in 10 deaths in the NT involve alcohol.²*

¹ Bravos.C (2017). LGANT Community Services Reference Group Presentation.

² Giorgi.C (2015). FARE. Preventing alcohol harms: The problem, the environment, the evidence and the policy responses.

- *While there are a range of approaches orientated towards reducing alcohol harms in play in the NT, the density and high number of alcohol outlets stymies the impact of these measures and in some instances prove counter intuitive. Restrictions can be confusing for the general public given the diversity of strategies in effect at any one time in an effort to reduce harms. Current approaches include the Temporary Beat Locations (Alice Springs, Katherine), Voluntary Liquor Accords (Darwin), Public Restricted Areas (Darwin and surrounds), Designated Dry areas/communities (Regional NT), licensing obligations and Accord agreements for opening and closure times and voluntary restrictions on high volume, cheap product by way of packaged liquor accords (Darwin).*
- *Council noted the moratorium on new packaged liquor outlets announced in 2016 by the Northern Territory Government (except in particular circumstances), however, there continues to be problematic availability for the size of population. This is particularly the case for availability of packaged liquor in the context of the serious alcohol harms the Territory confronts. Alcohol in Australia is more available than it has ever been. According to FARE's 2010 NT data (2015), there was 1 outlet for every 268 people aged 18 years and over. Almost 1 in 3 people in the NT consume alcohol in a way that puts them at risk of long terms harms.³*
- *Council invests considerable resources into its Darwin Safer City program in an effort to respond to compromised amenity coupled with the adverse impacts of public intoxication on community life. This program focuses on sharing the burden of response across the service system and industry, working in partnership to maximise coordination efforts, activation of public spaces, crime prevention through environmental design techniques to support residents and businesses, an assertive outreach response to bridge vulnerable people impacted by alcohol issues to key health and support services and advocacy to reduce alcohol supply. These actions among others, are contained within the Safer Vibrant Darwin Plan 2016-2019.*
- *Council as a key stakeholder, is invited to comment on liquor license applications that are new or seek a material or permanent variation. Over the past 2 years Council has seen an increase in applications to extend trade to include Christmas Day and Good Friday. Both days have limited or no access to public support services recognised as important health and wellbeing counter measures. Council is concerned by the lack of empirical data to inform licensing decisions and in the ongoing absence of services such as Sobering Up Shelters that at minimum, mirror the operating hours of Darwin's alcohol supply.*
- *Strategies that are frequently recommended by health and welfare agencies include license buy back schemes, limits to further availability, minimum floor pricing and a simplification of the tax system to reduce social harms⁴.*

³ Ibid.

⁴ Australian Medical Association (2012). *Change booze tax to reduce harm and boost budget.*

- *“It has become increasingly clear that in dealing with harm from alcohol, price matters. There is now an overwhelming consensus from leading Australian and international health authorities and researchers that alcohol taxation is one of the most effective policy interventions to reduce problems related to alcohol”.⁵*
- *While tax reform on alcohol is beyond the remit of Council’s responsibilities, the NT Government is well placed to advocate for change in this regard given the Commonwealth Government’s ongoing commitment to closing the gap and developing the North.*

Demand for alcohol

- *The Australian Institute of Health and Welfare (2010) asserts a comprehensive approach towards demand reduction that carries most impact includes community relevant strategies that disrupt or delay first use of alcohol, early intervention, accessible alternatives to alcohol use, accessible and culturally responsive treatment options and support beyond crisis, provided over time. Local service providers whose core business is to provide treatment, support and early intervention are best placed to have carriage of population health education strategies. Importantly, local services must be supported and funded in a manner that reflects the scale of the public health problems associated with alcohol harms.*

Data and evidence

- *Evidence based policy is necessary for cost effective social and public health policy. There is insufficient availability of real time data across the NT service system to measure harm. Lack of data, limits the construct of an evidence base to inform decision making, allocate resources, implement service responses and coordination and change policy settings in a responsive way that keeps pace with community need and expectations.*
- *An exemplar of a real time data tool that would add significant value to informing licensing decisions and community driven solutions can be found at <http://geomaps.vcqlr.vic.gov.au/> This contemporary resource provides a visual of the density and type of licensed venues and location which can assist in developing place based strategies to reduce harm and contribute to assessment of impact and feasibility of new and existing venues in a spatial context.*
- *Council’s Safer Vibrant Darwin Plan 2016-2019 advocates for the development of an inter-agency evidence based measurement tool for collaborative activities to better measure impact of interventions and begin to develop an evidence based relevant to the Darwin/NT locale.*
- *Development of supported and streamlined avenues for the sharing of data across all stakeholders to build evidence requires expertise and resourcing from Government. To illustrate, the Public Places Services Collaboration Group operates to enable greater service coordination and a shared response to alcohol harms in*

⁵ Daube.M & Stafford. J. (2016) MJA 204 (6) j 4 Alcohol and tax — time for real reform.

public spaces. Provision of seed funding for example to broker cross sectoral data sharing arrangements and agreed data sets would be of great value to enable more timely interventions measured for impact and adjusted accordingly, while leveraging from the strong commitment that exists within the PPSCG. Importantly, this group now reports to Council and the NT Government's Senior Officials Group who directly apprise the North Australian Capital City Committee.

Risk Based Licensing

- *Licensees in the Northern Territory currently pay the lowest fees for liquor licences in Australia⁶. Licensees pay a one-off application fee of \$200 for a liquor licence that is granted in perpetuity. There are no annual fees and the same fee applies to all venues, regardless of the location, type or size of the venue or its trading hours and turnover. In a risk based licensing system, venues with a higher risk would pay higher fees than venues with a lower risk, creating an incentive to reduce the risk of harm associated with a venue.*
- *Establishment of a liquor licensing fee structure based on empirical data and risk assessment rather than social perceptions of risk would provide a more equitable approach that recognises the uniqueness of place as well as outlet density.⁷*
- *Establishment of triggers for individual license renewals periodically ie 2,5 10 year point.*
- *The review of circumstances for what occurs to trigger a license evaluation for example, sale of a premises or a refurbishment/fit out.*
- *A review of penalties associated with noncompliance.*
- *Consider limits on promotions for packaged liquor⁸.*

Accords

- *City of Darwin is a member of the Darwin Inner City Packaged Liquor Accord and a member of the Darwin Northern Suburbs Liquor Accord group, the latter of which is yet to be endorsed by Licensing NT. The Accords target high volume cheap product that are frequently associated with incidences of antisocial activity by NT Police. Accord strategies include:*
 - *1 cask per person per day*
 - *Cask wine sales between 12 midday and 7:00pm only*
 - *Recording & reporting of suspicious sales & behaviour to Licensing NT & NT Police*
 - *No Shirt, No Service*
 - *No credit for alcohol (Book Up).*

⁶ Senate Select Committee (2017). Effect of red tape on the sale, supply and taxation of alcohol, Interim report, March.

⁷ Ibid

⁸ Safer Vibrant Darwin Plan 2016-2019 p18

- *Prominent display of ACCORD membership promotional materials.*
 - *No promotions on cask wine sales*
 - *Commitment to improving cross cultural learning & awareness.*
 - *Provision of Crime Prevention Through Environmental Design advice to all members*
- *Accords enable licensees to work with stakeholders such as NT Police and City of Darwin and demonstrate legitimate efforts to reduce harm without anticompetitive practice concerns. Whilst this is positive, the voluntary nature of accords limits impact, if all liquor outlets in a particular location do not participate.*
 - *Legislating mandatory participation in liquor accords that align with responsible service of alcohol requirements would support greater impact of the agreed restrictions and support place based strategies specific to local neighbourhoods.*
 - *Voluntary participation is a weakness of the accord model which typically sees compliant and responsible venues participate and venues with less interest opt for non-participation.*
 - *As Darwin has a proliferation of packaged liquor outlets in context of the population, consideration of buy backs of existing licenses in locations prone to hosting antisocial behaviour and where outlet density is apparent are worthwhile.*

Alcohol Harm Reduction

- *Current strategies applied to reducing harms associated with alcohol consumption while positive do not affect sustained population level change on account of outlet density and large numbers of outlets in the NT, insufficient and accessible data collection frameworks that are shared across all levels of government and service system to inform policy and strategy design including co-design, lack of resources and expertise for evaluation tools and the absence of significant policy levers that are recognised internationally to be effective in reducing harm.*

Policies identified as being effective and whose benefits are quantifiable are:

Price *(alcohol taxation including differential tax rates on forms of alcohol which are particularly subject to abuse, minimum pricing, bans on discounts and race to the bottom promotions;*

Availability *(limiting trading hours, limiting density of outlets, introducing time limited licenses and risk based licensing schemes, introducing saturation zones).*

Promotion *(phasing out of alcohol sponsorship and advertising, limiting point of sale promotions and removing promotions that encourage excess consumption⁹.*

⁹ Giorgi.C (2015) *Preventing Alcohol Harms: The Problem, The Environment, The Evidence and the Policy Responses*. Foundation for Alcohol Research & Education.

Cultural change in relation to drinking behaviours

- *Cultural change towards drinking behaviour requires a gradual shift in perceptions and behaviours of people and communities related to alcohol consumption. There are a range of interventions that can be employed that positively affect alcohol consumption and attitudes towards alcohol and can include:*
 - *changes to pricing and taxation;*
 - *regulating supply;*
 - *regulating alcohol sponsorship as well as the events that are sponsored;*
 - *enforcing liquor licensing regulations;*
 - *greater regulation of/reducing the promotion of alcohol (especially to young people);*
 - *specific measures that counter drinking behaviours such as those aimed at drink driving and youth drinking;*
 - *social marketing campaigns;*
 - *treatment/early interventions programs;*
 - *Community targeted alcohol interventions (eg. in Aboriginal communities).*
- *As recognition of alcohol harms grows and impacts communities, harmful use can trigger and foster local initiatives and solutions to counter it. Communities can be supported and empowered by governments and other stakeholders to use their local knowledge and expertise in adopting effective approaches to prevent and reduce the harmful use of alcohol by changing collective rather than individual behaviour.*
- *It is important that change evolves within an ethos of respect for cultural norms, beliefs and value systems.¹⁰ It is also important to utilise local Aboriginal Community Controlled Health Organisations (ACCHOs) to engage or assist with this process. No one intervention will be suitable for every community and/or individual. It is important the community utilises health and subject matter experts in order to affect real and lasting cultural and behavioural change towards harmful alcohol consumption.*
- *It is acknowledged that experts can quickly identify gaps and priority areas for interventions at community level, however reducing alcohol harms requires a coordinated, dedicated approach from a range of stakeholders within a community.*

¹⁰ World Health Organisation. (2010) Global strategy to reduce the harmful use of alcohol. WHO Library Cataloguing-in-Publication Data. Online on http://apps.who.int/iris/bitstream/10665/44395/1/9789241599931_eng.pdf?ua=1&ua=1

Reducing alcohol fuelled crime and anti-social behaviour

- *“The diversity of alcohol-related problems and measures necessary to reduce alcohol-related harm points to the need for comprehensive action across numerous sectors. Policies to reduce the harmful use of alcohol must reach beyond the health sector, and appropriately engage such sectors as development, transport, justice, social welfare, fiscal policy, trade, agriculture, consumer policy, education and employment, as well as civil society and economic operators”¹¹*
- *Council has long recognised that there is no quick fix solution to alcohol fuelled crime and anti social behaviour however the key policy levers of supply reduction, demand reduction, evidence based policy sensitive to place and a requirement for all sectors to work across the service system with a shared vision is vital. Such an approach enables strategies to be localised, data sharing that does not collide with bureaucratic red tape, but that is shared as a contributor to a mutually sought endpoint of a safe and vibrant community.*
- *In 2014, Council, in partnership with the Northern Territory Police established the Public Places Services Collaboration Group (PPSCG) to serve the Darwin municipality.*
- *The PPSCG is a 25 member strong group comprising senior agency representatives from across the service system including health, welfare, policing, all spheres of government, non-government agencies and industry who together, information share, develop solutions and maximise operational coordination efforts in responding to alcohol harms adversely impacting community amenity and community life across.*
- *This response is considered best practice supporting greater cross agency information sharing and response coordination. Each member of the Group has a response capability in some form and tasked with addressing alcohol harms either directly or indirectly. It is purposefully focused on operational activity and a sharing of the burden of response to better serve our community. Emphasis is placed on ensuring the Group is active in identifying problems and developing solutions, making change and achieving outcomes.*
- *The ethos underpinning the work of the Group is recognition that no single agency has the mandate or capability to respond effectively to alcohol harms in isolation, and that working collaboratively is paramount. The Group also oversees implementation of City of Darwin’s partnership based Safer Vibrant Darwin Plan 2016-2019.*
- *In terms of governance, PPSCG reports to Council and the NT Government’s Senior Officials Group who directly apprise the North Australian Capital City Committee. This newly established framework enables a responsive feedback mechanism to decision makers.*

¹¹ World Health Organisation (2010). *Global strategy to reduce the harmful use of alcohol*. pp 14

- *On a local level, as described within the Safer Vibrant Darwin Plan 2016-2019, in addition to strong resourced cross sectoral service coordination, supply reduction, demand reduction and data informed decision making, the Darwin municipality would benefit from consideration of;*
- *Provision of safe shelter(s) that are culturally appropriate and accessible for visitors and vulnerable population groups have are homeless and marginalised, struggling with alcohol harms.*
- *Provision of sobering up care shelters that are accessible, well resourced, and minimally, operate seven days a week, matching the span of hours of licensed outlets. Such facilities should also be bolstered with barrier free/accessible wrap around support services for people with complex support needs that are difficult to reach.*
- *Increased supply of accessible culturally responsive public housing.*

Alcohol service provision and management in remote Aboriginal communities, including town camps.

- *Council recognises a need for community to better coexist with alcohol and supports community informed strategies that are relevant, that resonate culturally, that are place based and that do not seek to apply a one size fits all approach.*
- *Communities are rich in wisdom of what works and what does not work on a local level. There is no panacea for alcohol harms however it is well known that enforced strategies frequently fail, are expensive and frustrate residents who have little or no connection to each strategy.*
- *Leveraging from the local leadership, wisdom and local expertise present in each community regardless of location will result in responses to alcohol that have lasting impact and affect change.*

Liquor licence density considerations

- *The World Health Organisation's Global Strategy To Reduce The Harmful Use of Alcohol (2010) indicates a discrepancy between the increasing availability and affordability of alcohol and capacity to deal with the public health burden that follows.*
- *Public policies and interventions to prevent and reduce alcohol-related harm should be guided by clear public health goals and the best available evidence¹².*
- *A review of off premise license numbers to understand the cumulative impact across the municipality and more broadly the NT will enable the development of an evidence base for future decisions and aid a more holistic consideration of tackling harms.*

¹² Ibid. p10

Considerations for safe and vibrant entertainment precincts

- *Alcohol in entertainment precincts has many benefits, creating economic activity, employment, socialisation, space activation and entertainment. A blend of large numbers of people gathering, public intoxication impacts and venue density must also be considered.*
- *Council as custodian of the precincts invests significant resources into maintaining a safe accessible environment as well as the cleaning of public spaces. Issues including crime, perception of crime, violence, compromised amenity, sufficient lighting, transport infrastructure to highlight a few. The most effective approaches to vibrant safe entertainment precincts are those that are an integration of multiple policy elements, have precinct plans, are steered by local evidence and are inclusive of community involvement.*
- *Considerations for safe and lively precincts that offer a diversity of attractors, have dispersal plans to assist crowds exiting venues at staggered times, have sufficient well maintained public amenities, adequate security including private and public services, a range of food choices and availability and are well connected to transport facilities. Evidence and data collected over time assists in creating vibrant precincts and in creating appealing locations that respond to community demand. Additional factors to be considered include:*
 - *Pricing/affordability*
 - *Licensing including outlet density and variety (eg small bars, live music venues) and span of hours*
 - *Monitoring and enforcement*
 - *Health/emergency care*
 - *Community education campaigns and community involvement*
 - *Premise design and internal venue environment and atmosphere*
 - *Glassware management within premises*
 - *Management and staff training/capability*
 - *Public realm design, CCTV, street lighting, public amenities*
 - *Glassware management outside premises*
 - *General layout*
 - *Transport including parking, taxis and buses*
 - *Policing*¹³

¹³ Wickham.M (2012). *Alcohol consumption in the night-time economy*. Greater London Authority. GLAECONOMICS.

Consideration of other strategies

- *Population level change that brings a permanent reduction in alcohol related harms requires time, commitment, resolve and leadership divorced from political terms or pilot timeframes that must achieve visible results in funding cycles, but rather, a shared recognition of the complexity it presents and the harms that must be responded to. For example the approach taken with tobacco reform over successive governments, with bipartisan agreement for change.*
- *Alcohol is no ordinary commodity. Its adverse impacts are felt profoundly across the fabric of community life, family life, the health and wellbeing of individuals and community amenity.*
- *Reducing the adverse impacts of alcohol harms requires policy that serves the public interest, adequate resourcing and a shared investment in change from a diversity of leaders and sectors over the long term. A brokered agreement that change is possible and that coexisting with alcohol in a less harmful way is both necessary and achievable is required.*