



Acting Research Director
Legal Affairs and Community Safety Committee
Parliament House
George Street
Brisbane Qld 4000

By email to lacsc@parliament.qld.gov.au

Dear Acting Research Director

Submission regarding the Liquor and Other Legislation Amendment Bill 2017

Thank you for providing an opportunity to provide comments on the Bill which we note is part of the Queensland Government's response to the evaluation report prepared by Ferris and colleagues from the University of Queensland's Institute for Social Science Research, Impact of the last drinks and lockouts. We are surprised and disappointed that you have provided only one day for us to prepare and submit a response. This is a poor example of stakeholder consultation as it does not enable us to prepare a detailed submission.

AP SAD is the Asia Pacific's leading multidisciplinary organisation for professionals involved in the alcohol and other drug field. AP SAD is dedicated to increasing the profile of the issues related to the use of alcohol and other drugs, through the dissemination of information from the wide range of professions involved in this field. In addition, we strive to promote improved standards in clinical practice and in research into this and allied subjects. It also provides a network of drug and alcohol professionals in Australia, New Zealand and the Asia Pacific.

Through its internationally recognised scientific journal, the Drug and Alcohol Review, and its annual Scientific Conference, AP SAD provides a forum for the latest research on the nature, prevention and treatment of physical, psychological and social problems related to the use of psychoactive substances.

AP SAD currently has 300 members across Australia and around the world. The Society has particularly strong links with New Zealand and the Asia Pacific region.

Our members represent a wide range of professional disciplines including; administrators, educators, counsellors, general practitioners, nurses, physicians, psychologists, medical researchers, pharmacists, policy advisors, psychiatrists, social/behavioural researchers, and public health experts.

First, AP SAD congratulates the Queensland Government on commissioning an independent, expert, external evaluation of the implementation of the Tackling Alcohol Fuelled Violence Policy (TAFV Policy), and on releasing the evaluators' Interim Report for public information and comment. This is good public policy practice, albeit marred by the unusually short time given to stakeholders to respond.

Secondly, as the Interim Report points out, a strong body of evidence exists demonstrating how extended liquor trading hours are causally implicated in many types of alcohol-related harm,

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both in public places and in private places such as the home where domestic and family violence too often occurs. Furthermore, the research clearly demonstrates that reducing liquor trading hours reduces the incidence of alcohol-related harms, including violence in public and private places. Given these facts, effective implementation of the TAFV Policy will have at its core reducing the availability of alcoholic beverages during what are now high alcohol hours, particularly through further restricting liquor trading hours.

We note from the Interim Report that the Policy has been poorly implemented in the sense that the goal of significantly reducing liquor trading hours has not been achieved owing to the widespread declaration of safe night precincts and the profligate issuing of exemptions permitting extended trading. This poor fidelity of implementation of the Policy, combined with the short period (six months) during which the Policy was implemented and subject to evaluation, and the availability of only six data points as input into statistical analyses, has meant that the evaluators have not yet been able to reach firm conclusions and recommendations. They have noted, however, that there do not seem to be any significant reductions in the alcohol-related harms, especially violence, upon which the Policy is intended to impact.

Thirdly, APSAD is also conscious that the research evidence is still inconclusive about the impacts of lockouts. It does seem that lockouts, alone, do not significantly impact on alcohol related harm. One of the strengths of the Policy, however, is that it is multipronged and, in our view, a comprehensive Policy could well include lockouts along with other interventions, particularly reduced trading hours which probably have greater positive impacts in terms of violence reduction.

Fourthly, APSAD is pleased to see that the Bill directly addresses the evaluators' comments about extended trading hours. We support the proposal to restrict temporary late-night extended hours to genuine special occasions and not as part of 'business as usual' late-night trading, to quote the Explanatory Memorandum. It will be important that the licensing authorities implement both the spirit and the wording of these provisions as licensees will continually attempt to find ways around restricted trading hours and the temporary permits have in the past been a preferred approach for doing so.

Fifthly, we question just how the proposed tightened late-hours provisions will be implemented and what it will mean in terms of alcohol availability. Having a few licence premises open late, with different premises open late changing from night-to-night, encourages people to move between liquor outlets when they are already intoxicated or well on the way towards that state. A better solution, one which the closing-hours impact research literature points to, would be a clear (and earlier than present, e.g. 2.00 a.m. across the board) cut-off time for serving alcohol, but allowing places to stay open (and sell food, soft drinks, coffee, or whatever) after that time.

Sixthly, APSAD notes that the Bill amends the Penalties and Sentences Act '...to allow a sentencing court to impose a banning order on offenders convicted of a prescribed drug offence, where the offence was committed in, or in a public place in the vicinity of, licensed premises. These amendments recognise the harm posed by this cohort of drug offenders in terms of the potential drug-related violence that may occur consequential to the sale or supply of drugs to persons in and around licensed premises', to again quote the Explanatory

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Memorandum. We cautiously support this legislative initiative as it parallels existing provisions banning some individuals from licensed premises where they have demonstrated consistent pattern of problematic alcohol-related behaviour. We caution the Government, however, to ensure that the implementation of this provision, if legislated, does not become a Trojans' Horse for inappropriately heavy law enforcement against people committing low-level, consumer-type drug offences, hence diverting law enforcement resources from areas in which they can produce greater benefits to the community at large.

In conclusion, APSAD commends the Government on acting on the contents of the Interim Report of the expert evaluators of the TAFV Policy, and urges that this be done in such a way that it leads to a net reduction in the availability of alcohol during late-night hours across Queensland, an outcome which we are confident will lead to lower levels of alcohol-related violence in the State.

Yours faithfully,



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