



Foundation for Alcohol
Research & Education



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**10 point plan to reduce
alcohol-related harms
in NSW**

August 2012



Foreword

Alcohol-related violence has become front page news over recent weeks. Tragic events have mobilised the community, ignited media interest and put pressure on the State Government to act to reduce alcohol-related harms.

The O'Farrell Government now finds itself at the cross-roads. Before it, lies an opportunity, born from tragedy, to introduce a comprehensive plan to reduce alcohol-related harms across the state and for all the people of New South Wales.

It is a complex issue, but importantly, this is not a problem without solutions.

It is an issue that needs to be tackled with courage and conviction, but significantly, it's one in which the community stand united. An overwhelming majority of NSW adults believe more needs to be done to reduce the harms caused by alcohol.

Since 2001 my organisation, the Foundation for Alcohol Research and Education (FARE) has been working to prevent the harmful use of alcohol in Australia. For over ten years FARE has played a leading role in alcohol policy reform and made a significant contribution to alcohol research.

FARE's 10 Point Plan to Reduce Alcohol Related Harms in NSW represents a complete solution for the people and communities of NSW; a comprehensive plan based on the current evidence-base and best practice of what works to reduce alcohol-related harms.

I urge the Premier to look further than the problems of Kings Cross, to consult and consider stakeholders, and to embrace evidence-based solutions that are guaranteed to reduce alcohol-related harms and to improve the lives, and the health and safety of the people of NSW.

FARE stands ready to lend its support to NSW Government and community efforts to take meaningful action.



Michael Thorn, Chief Executive, FARE



The ten point plan

1. Wind back late night trading hours

FARE proposes that the NSW Government legislate to introduce a 12 month statewide trial of the reduction of trading hours based on the Newcastle alcohol restrictions, including:

- i. a common 3.00am closing time for all pubs and clubs with extended trading license conditions across NSW;
- ii. lockouts at all extended trading licensed premises from 1.00am; and
- iii. the trial should be independently evaluated to ascertain the social, health, crime and economic effects of these trading controls. The data collection requirements for this independent evaluation should be in place from the commencement of the 12 month trial.

2. Impose a moratorium on late night trading

FARE proposes that the NSW Government adopt a state-wide moratorium that prevents new liquor licenses from trading after midnight.

3. Make late night licensed premises contribute to the costs of alcohol-related harms

FARE proposes that the NSW Government introduce a risk-based licensing fee system that offsets and attributes the cost to Government and the community of administering and managing the impact of alcohol use and misuse on the community.

4. Control the density of licensed premises

FARE proposes that the NSW Government:

- i. establish and enforces saturation zones in areas that are identified as already having large numbers of liquor licences including the City of Sydney; and
- ii. introduce cumulative impact and cluster control policies for the determination of new liquor licenses.

5. Prevent the harmful discounting and promotion of alcohol

FARE proposes that the NSW Government strengthens the *Liquor Act 2007 (NSW)* to prohibit the harmful discounting and promotion of alcohol products, and ensure that these measures are enforced.

6. Enforce responsible service of alcohol requirements

FARE proposes that the NSW Government:

- i. introduce measures to better enforce RSA requirements in licensed venues throughout NSW, including Compliance Officers visiting licensed premises outside of regular business hours.
- ii. introduce requirements for OLGR and the NSW Police to publically report on compliance activities relating to the Liquor Act 2007, the number of venues inspected and their location, the times of day that these venues are inspected and the number of identified breaches of compliance.
- iii. prohibit the sale of shots, mixed drinks with more than 30ml of alcohol and ready mixed drinks stronger than five per cent alcohol by volume after 10.00pm;
- iv. prohibit the sale of more than four drinks to any patron at one time and a requirement to provide free water stations on every bar; and
- v. prohibit the sale of alcohol mixed with energy drinks after midnight.



7. Give people a say on the availability of alcohol in their community

FARE proposes that the NSW Government:

- i. extend the provisions for consultation processes set out in reg.11 of the Liquor Regulation 2008 to include the need for public consultation on new liquor licence applications; and
- ii. establish a service to support people and organisations that wish to raise concerns regarding new liquor licence applications.

8. Introduce appropriate transport and crowd management options in high density areas

FARE proposes that the NSW Government:

- iii. examine areas with high density of outlets and develop late night transport and crowd management plans; and
- iv. consider public transport operating times when issuing liquor licenses.

9. Further the evidence-base for alcohol-related policies through improved data collection

FARE proposes that the NSW Government:

- i. resume the collection and publication of alcohol sales data in NSW and makes this data available to the National Alcohol Sales Data Project and other relevant agencies and research bodies; and
- ii. work collaboratively to improve processes for the collection and coding of alcohol harms data including data from ambulance services, hospitals and police.

10. Measure, evaluate and improve

FARE proposes that the NSW Government develop an evaluation framework for the assessment of alcohol-related policy reforms and undertakes or funds independent evaluations of them as they are implemented.



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Introduction

- **80 per cent of people from New South Wales (NSW) believe that Australia has a problem with alcohol and 77 per cent think that more needs to be done to address alcohol-related harms.**
- **34 per cent of people from NSW have been affected by alcohol-related violence.**
- **Alcohol has never been more readily available in NSW with one liquor licence for every 470 people.**
- **The excessive availability of alcohol is a significant contributor to alcohol-related harms, with increases in liquor outlets and increases in trading hours both being factors.**

The NSW Government should implement a comprehensive evidence-based plan to address alcohol-related harms that targets the heart of the problem, being the excessive availability of alcohol. This is such a plan.

The overwhelming majority of people from NSW believe that Australia has a problem with alcohol (80 per cent), and that more needs to be done to address alcohol-related harms (77 per cent).¹ Despite this, they do not conceive that these problems will be addressed anytime soon, with 76 per cent believing that alcohol-related problems will worsen, or at best remain the same over the next five to ten years.²

The people of NSW know all too well that the harms from alcohol can have devastating effects, with 34 per cent having been affected by alcohol-related violence. The harms from alcohol not only affect the drinker, but also impact on people in the broader community. An internationally renowned Australian study commissioned by FARE found that 367 people die each year in Australia because of someone else's drinking. There are also 70,000 victims of alcohol related assaults including 24,000 victims of domestic violence.³

When tragic alcohol-related incidents occur in the community, there is often significant pressure on governments to respond. This can sometimes result in the development and implementation of ad-hoc and incomplete policy responses that do not address the core of the problem, being, the availability, affordability and promotion of alcohol. The NSW Government now has an opportunity to demonstrate leadership by implementing a comprehensive plan of action that is based on the current evidence-base and best practice of what truly works to address alcohol-related harms.

The availability of alcohol is a significant contributor to alcohol-related harms and in NSW alcohol has never been more readily available. There is one liquor licence for every 470 people in NSW. Increased availability of alcohol, both through the increased numbers of outlets and longer trading hours, contributes to alcohol-related violence and harms. Pubs and clubs are often the focus of policies to reduce alcohol-related harms. However, increases in take-away alcohol outlets also contribute to violence and domestic violence rates.⁴ Take-away alcohol is also often considerably cheaper than alcohol purchased at pubs and clubs, with wine being available for as cheap as 25 cents per standard drink. The greater availability of cheap take-away alcohol has led to a culture of pre-loading where people consume alcohol before visiting licensed premises.

FARE has prepared a plan of action for the NSW Government which includes ten evidence-based solutions to reduce alcohol-related harms. The plan acknowledges that no single strategy will reduce alcohol-related harms, and so instead a range of evidence-based strategies are required to achieve the best possible outcomes.

FARE acknowledges that in addressing alcohol-related harms, there is a role for Commonwealth, state,



territory, and local governments. The Commonwealth Government should take a leadership role on issues such as pricing and promotion and should also be working with jurisdictions to implement best-practice available measures.

The role for the NSW Government is also clear. Liquor licensing, planning and transport are the responsibility of state and territory governments and changes to these policy areas can result in significant reductions in alcohol-related harms. The NSW Government must now act immediately to implement a comprehensive and evidence-based plan to address alcohol-related harms.



The detail

1. Wind back late night trading hours

Research on the relationship between the trading hours of licensed premises and alcohol-related harm has consistently demonstrated that increased trading hours are associated with increased harms.⁵ Recent restrictions introduced in the NSW city of Newcastle demonstrate how even modest reductions in the trading hours of licensed venues can substantially reduce alcohol-related harms.

In 2008, as a result of escalating local concern about alcohol-related violence, the NSW Liquor Administration Board imposed a number of restrictions on 14 licensed premises in Newcastle. The most notable of these restrictions was the imposition of a lockout from 1.00am for 14 hotels, and bringing forward closing times. Closing times were changed to 3.00am for the 11 premises that were previously licensed to trade until 5.00am and to 2:30am for the three premises that had previously been licensed to trade until 3.00am. The lock out was later moved to 1:30am and the closing time to 3:30am following a legal challenge by the licensed premises and as a result of an out-of-court agreement with NSW Police.

An evaluation carried out in the 12 months following the introduction of these restrictions in Newcastle found that there was a 37 per cent reduction in alcohol-related harms when compared to a control site.⁶ This equates to a reduction of 33 assaults per quarter. The evaluation also found that there was no geographic displacement to the nearest late night district of Hamilton⁷. This reduction in harms was not only sustained, but improved. A further study three years after the restrictions were introduced found a 35 per cent reduction in night-time non-domestic assaults requiring police attention and a 50 per cent reduction in night-time street offences.⁸

FARE proposes that the NSW Government legislate to introduce a 12 month statewide trial of the reduction of trading hours based on the Newcastle alcohol restrictions, including:

- i. a common 3.00am closing time for all pubs and clubs with extended trading license conditions across NSW;
- ii. lockouts at all extended trading licensed premises from 1.00am; and
- iii. the trial should be independently evaluated to ascertain the social, health, crime and economic effects of these trading controls. The data collection requirements for this independent evaluation should be in place from the commencement of the 12 month trial.

2. Impose a moratorium on late night trading

Much of the harm that results from alcohol misuse on licensed premises occurs after midnight. It is estimated that close to 70 per cent of police assaults are alcohol-related and 60 per cent of nurses have recently experienced violence in the workplace, with an estimated half of these attributed to alcohol or drugs.⁹ This demonstrates that the problem is late night trading. Consequently steps should be taken to no longer allow any further liquor outlets to extend their trading beyond midnight.

In 2009, the Queensland (QLS) Government introduced a moratorium on applications for extended hours between 12.00am and 5.00am. The Queensland Government stated that these measures were introduced because *'the community is increasingly worried about the level of alcohol-fuelled violence out there on our streets, not just the amount of violence but the increasing severity of it.'*¹⁰ The moratorium precludes new licensed premises or types of licensed premises (e.g. late trading premises) being opened in a specified area.

The moratorium applies to all extended trading hours application currently before the Queensland Office of Liquor Gaming Regulation. The moratorium was originally in place for 12 months and has now been extended until December 2013.

FARE proposes that the NSW Government adopt a state-wide moratorium that prevents new liquor licensees from trading after midnight.



3. Make late night licensed premises contribute to the costs of alcohol-related harms

The additional stress that alcohol-related incidents place on our police and emergency service workers late at night results in substantial costs to the community. Alcohol-related crime is estimated to cost Australia \$1.7 billion, with over \$740 million alone spent on policing, and alcohol-related ambulance service usage is estimated to cost \$80 million annually.¹¹ It is also apparent that there are costs to the health system, transport, local government and other government services that spill over from the use and misuse of alcohol. These costs should not be borne by taxpayers and ratepayers.

Risk based licensing (RBL) fees are a structure based on a range of factors that may increase a venue's risk of facilitating harms such as increased trading hours and high occupancy levels. The rationale for the introduction of these measures is that those who incur the costs pay the costs. RBL fees can also be used to pay for late night transport options and crowd control strategies. RBL fees have been introduced in a number of jurisdictions in Australia including the Australian Capital Territory (ACT), QLD, and Victoria, and are currently under consideration in the Northern Territory. In announcing the new risk-based licensing scheme in QLD, the Government stated that the policy 'is about ensuring the industry contributes to the costs of alcohol-related harm and crime - those costs should not be a burden taxpayers have to shoulder'.¹²

The ACT Government's rationale for introducing RBL is for liquor licensing fees to recoup the policing costs caused by alcohol-related violence in entertainment precincts, with individual venues required to pay fees commensurate with their likely risk and scope of alcohol-related harm. For example, in December 2010, the ACT introduced a model of RBL which sets liquor licensing fees for "on-premise licenses" based on premise trading hours, occupancy level, and amount of liquor purchased, each of which have been shown to correlate with levels of alcohol-related harm.

Initial analysis of the impacts on RBL fees by ACT Policing indicated that in 2011 there had been a 17 per cent reduction in alcohol-related arrests, a 6 per cent reduction in alcohol-fuelled assaults and a 9.67 per cent decrease in the number of people taken into custody for being intoxicated, when compared to 2010.¹³

FARE proposes that the NSW Government introduce a risk-based licensing fee system that offsets and attributes the cost to Government and the community of administering and managing the impact of alcohol use and misuse on the community.



4. Control the density of licensed premises

Research has consistently found an association between alcohol outlet density and negative alcohol-related outcomes.^{14 15} Recently in Victoria, an analysis was undertaken of the effects of licensed outlet density on several measures including assault, domestic violence, chronic harms and high risk drinking in young people. The analysis found there was a strong association between reported assaults and all three outlet types, general licences, on-licence and off-licence.¹⁶ A 10 per cent increase in general licence rates in an area increased rates by 0.6 per cent, while a 10 per cent increase in off licence rates increased assault rates by 0.8 per cent.

International studies have shown that increased outlet density has also been linked to higher rates of road traffic accidents, drink driving or being a passenger of a drink driver, robbery, homicide, suicide (both attempted and completed), child maltreatment, deviant adolescent behaviours, sexual offences and sexually transmitted infections.¹⁷

There are too many licensed venues in NSW. In 2010-11 there were a total of 15,115 liquor licenses in NSW.¹⁸ This equates to approximately one licence for every 470 people in the state. This density of licensed premises is most apparent in the city of Sydney, where there are currently 2,205 licensed venues; of which 287 can trade 24 hours a day and 666 trade after midnight.¹⁹ The large number of licensed venues and late night trading hours is concerning as the evidence clearly indicates that a large number of outlets and increased trading hours results in greater harms.

The City of Sydney currently has a liquor freeze in place for precincts in the Sydney Local Government Area (LGA) with active night-time economies. This freeze prevents further liquor licenses (both on- and off-licenses) being granted for areas with high density and associated alcohol-related problems. Given that, according to a recent study's calculations, the introduction of one extra alcohol outlet per hectare in the Sydney LGA would result in an additional 4.5 assaults per year,²⁰ this action by the City of Sydney is relevant, timely and commendable. However, this is just a short-term solution to a long-term problem. While the freeze is in place there is a need for consideration of longer-term solutions to curb alcohol-related violence by limiting the density of alcohol outlets.

There are a number of policies that can be implemented to control the number of licensed outlets. Two of these policies are introducing "saturation zones" and "cluster controls". "Saturation zones" impose limitations on the provision of new licenses in areas where it has been identified there are a high density of licenses. While "cluster controls" prohibit new liquor licenses for premises within a specified distance of existing licensed premises or other amenities (e.g. schools, hospitals, churches or places of religious worship).²¹

Since 2005, local authorities in England and Wales (typically a council or borough) have been able to establish "saturation zones" within their licensing policies where no new licensed premises are permitted.²² These "saturation zones" are determined on the basis of existing outlet density levels and crime data including domestic violence statistics. The establishment of "saturation zones" and the basis for these zones is at the discretion of the individual local authority, but is not enacted in the *National Licensing Act*. Also, licence applicants have the right to appeal if they apply for a licence in a saturation zone and are refused.

"Cluster controls" are another policy measure that is designed to reduce alcohol-fuelled violence that results from the over-abundance of pubs and clubs. There are many examples of "cluster controls" internationally, for example in England and Wales, Paris and New York. New York has enacted "cluster controls" through their *Alcohol Beverage Control Act*. Since 1993 the legislation has included the "500 foot" (150 metres) rule which prohibits new on-premises licenses being issued within a 500 foot radius of three or more existing licenses.²³ The rationale for such a measure is to ameliorate the potentially negative cumulative impact of areas that have high outlet density on public health, violence and crime. Similarly in Paris under the *Code de La Sante Publique* (public health legislation), there are protected areas within which new liquor licenses are prohibited if they are within 75 metres of a licensed premise of the same category.²⁴

FARE proposes that the NSW Government:

- i. establish and enforces saturation zones in areas that are identified as already having large numbers of liquor licences including the City of Sydney; and
- ii. introduce cumulative impact and "cluster control" policies for the determination of new liquor licenses.



5. Prevent the harmful discounting and promotion of alcohol

Evidence clearly shows that low alcohol prices result in high alcohol consumption and alcohol-related harms. The most significant government intervention to address low alcohol prices is tax and the establishment of minimum pricing policies. The Commonwealth Government is best placed to set the alcohol taxation rates at levels that minimise the harms caused by alcohol. However, there is also a role for states and territories to regulate the pricing of alcohol by using their powers to intervene to prevent excessive discounting and promotion of alcohol products.

The *Liquor Act 2007 (NSW)* currently allows for the Director of Liquor and Gaming to 'restrict or prohibit an activity or promotion in a specific venue if the Director believes that the activity or promotion':

- involves the provision of alcohol in 'non-standard measures that encourage irresponsible drinking and is likely to result in intoxication';
- 'involves free drinks, or extreme discounts or discounts of a limited duration, that creates an incentive for patrons to consume liquor more rapidly than they otherwise might'; or
- 'encourages irresponsible, rapid or excessive consumption of liquor'.

While these regulations exist alcohol is too frequently discounted, promoted in activities like 'happy hours' and sold in a way that encourages people to consume alcohol more rapidly (e.g. 'shots' or 'bombs') and harmfully. Often such restrictions are only imposed once a venue has been reprimanded following complaints arising from alcohol-fuelled incidents. The *Liquor Act 2007 (NSW)* should go further and prohibit these activities, appropriately enforce them to ensure that they do not continue to occur.

FARE proposes that the NSW Government strengthens the *Liquor Act 2007 (NSW)* to prohibit the harmful discounting and promotion of alcohol products, and ensure that these measures are enforced.


6. Enforce responsible service of alcohol requirements

All staff that work in a licensed premises in NSW are required to hold a Responsible Service of Alcohol (RSA) Certificate. RSA includes a range of responsibilities for licensees and people working in licensed venues including providing water and food to patrons, not serving alcohol to intoxicated persons and the service of alcohol in measures that reduce the risk of rapid consumption. Penalties exist in the *Liquor Act 2007 (NSW)* for some areas of RSA such as the provision of alcohol to intoxicated persons, where a staff member can be fined up to \$11,000 if found doing so.²⁵

For RSA practices to be effective, they need to be enforced and promoted. Without appropriate enforcement mechanisms, RSA measures have limited impact on the behaviour of people working in licensed venues and do not reduce alcohol-related harms.²⁶ In NSW RSA requirements are currently enforced by the NSW Police and Compliance Officers at the Office of Liquor Gaming and Racing (OLGR). There is currently no legislative obligation for licensed premises to report on the compliance actions of OLGR or the NSW Police in undertaking their compliance activities.

A recent audit of licensed premises in Kings Cross found that there was a large disparity between the number of people that were refused service due to intoxication and the number of people being vacated from premises because of intoxication.²⁷ This supports contentions that people continue to be served alcohol until they are heavily intoxicated and are then thrown out onto the streets.

While this audit was carried out in Kings Cross, this situation is replicated in other licensed premises across the state and NSW and indeed the country. This is in part a result of the lack of enforcement of RSA requirements. A further example of this is the sale and marketing of alcoholic products that encourage rapid and excessive consumption of alcohol and increases the speed to intoxication.



These products include those designed to be consumed quickly such as 'shots', and those that include excessive amounts of alcohol, for example 'doubles' and some Ready-To-Drink beverages (RTDs). These products also contribute to the culture of 'drinking to get drunk' by encouraging the rapid consumption of alcohol to intoxication. Restricting the sale of products with the highest alcohol content will result in patrons at licensed premises having to select a product of lower alcohol content, resulting in a decline in the amount of pure alcohol consumed.

In addition to these alcohol products, alcohol mixed with energy drinks are becoming a major concern in the Australian community. FARE's 2012 Annual Alcohol Poll found that 16 per cent of adult Australians have consumed alcohol mixed with energy drinks, and is highest among people aged 18-24 years, with 49 per cent of this age group reporting this. There are three main harms associated with mixing alcohol and energy drinks, including that:²⁸

- Energy drinks have been shown to mask the effects of intoxication. This can result in increased risky behaviours such as drink driving and even alcohol poisoning.
- Alcohol and energy drinks are diuretics and can cause dehydration. In extreme cases, this can result in death which has been demonstrated by the reported deaths from energy drink consumption after playing sport.
- Mixing stimulants and depressants send mixed messages to the nervous system. This is because caffeine increases the heart rate and blood pressure, while alcohol has the opposite effect.

Internationally there have been moves to restrict the sale of alcohol and energy drinks and to increase awareness of the harms associated with these products, including a ban of the promotion of alcohol combined with energy drinks at sporting events in Ireland,²⁹ and the prohibition of the consumption of energy drinks in Denmark.³⁰

RSA requirements assist licensed premises to provide a safe environment. However this does not occur if these are not appropriately enforced or policed. This enforcement cannot be left to licensed premises alone, but needs to be undertaken by Government to ensure that licensees are meeting their obligations under RSA.

FARE proposes that the NSW Government

- i. introduce measures to better enforce RSA requirements in licensed venues throughout NSW, including Compliance Officers visiting licensed premises outside of regular business hours.
- ii. introduce requirements for OLGR and the NSW Police to publically report on compliance activities relating to the Liquor Act 2007, the number of venues inspected and their location, the times of day that these venues are inspected and the number of identified breaches of compliance.
- iii. prohibit the sale of shots, mixed drinks with more than 30ml of alcohol and ready mixed drinks stronger than five per cent alcohol by volume after 10.00pm;
- iv. prohibit the sale of more than four drinks to any patron at one time and a requirement to provide free water stations on every bar; and
- v. prohibit the sale of alcohol mixed with energy drinks after midnight.



7. Support communities to have greater control over the availability of alcohol in their community

Members of the general public and people working in areas that are directly affected by alcohol use and misuse should have the opportunity to comment on and raise concerns regarding applications for new licensed premises. However, the onus of proof often lies solely with the community member or organisations demonstrating that a licence application will negatively affect their neighbourhood, rather than on the potential licensee to demonstrate that their premise will do no harm.

The *Liquor Act 2007 (NSW)* includes a requirement for liquor licence applicants to prepare a Community Impact Statement and consult with community representatives such as local councils, police, health services and community organisations to 'seek a range of views and possible concerns'.³¹ They are also required to prepare a notification to occupiers of nearby premises.

This process differs from the requirements included in the *Liquor Act 1982 (NSW)* which called for prospective licensees to advertise to give notice of their impact statements in local and state-wide newspapers. This process also differs from that of other jurisdictions, such as Victoria where a licence applicant must provide notice of their application and invite objectors to lodge any concerns with the relevant authority.³²

While provisions for consultation exist to a limited extent in NSW, the data and evidence requirements to support submissions are often extensive and require expertise in research and legal areas. Relevant services, as well as members of the general public, do not usually have the resources at their disposal to gather the data needed to prepare submissions. This can result in warranted concerns being overlooked.

Greater opportunity for consultation with the general community should be a requirement of new liquor licence applicants. This consultation process should be well publicised and people should be given a reasonable period of time to make submissions. Furthermore, support should be offered by the relevant authority in the collection of data to support any submissions raising such complaints.

FARE proposes that the NSW Government:

- i. extend the provisions for consultation processes set out in reg.11 of the Liquor Regulation 2008 to include the need for public consultation on new liquor licence applications; and
- ii. establish a service to support people and organisations that wish to raise concerns regarding new liquor licence applications.



8. Introduce appropriate transport and crowd management options in high density areas

Transport availability in and around areas with a high density of licensed premises is a key challenge in the City of Sydney and in other areas across NSW. In Sydney, 58 per cent of people are not satisfied with access to public transport at night and want more bus and rail services.³³ Furthermore, the taxi industry has called for more public transport options due to the size of crowds late at night, arguing that taxis should not be the major mover in the high density areas.³⁴

One of the key problems with public transport is that many licensed venues are open long after public transport stops operating. When public transport options are not made available, increasing numbers of people are forced to remain on the streets for longer periods of time, and competition for available transport can increase conflict and disorder.³⁵

The experience of competing for limited resources in a crowded environment can be frustrating at the best of times, but within contexts in which the majority of people are likely to be in some way intoxicated, the risk of 'negative' outcomes can be heightened.³⁶ High density areas can be 'hot-times' for crime, as it is generated by circumstances in which crowds are brought together in largely uncontrolled environments where intoxication is common.

The World Health Organization (WHO) encourages the provision of alternative transportation, including public transport until after the closing time for licensed premises, as a strategy to reduce alcohol-related harms.³⁷ Transport options should be varied and made available up until and after licensed premises have ceased trading.

FARE proposes that the NSW Government:

- i. examine areas with high density of outlets and develop late night transport and crowd management plans; and
- ii. consider public transport operating times when issuing liquor licenses.

9. Collect data on alcohol sales, consumption and harms

Collection of data on alcohol consumption and harms is vital to building the evidence-base for policies that are proven to reduce alcohol-related harms. However there are significant gaps in the collection of alcohol-related data in NSW. For example, NSW is one of three Australian states or territories that do not collect wholesale alcohol sales data. NSW Government Agencies have repeatedly recommended that the NSW Government collect and make sales data available to researchers, law enforcement organisations and public health professionals. This information will provide us with the most accurate picture of what Australians drink, which in turn enables researchers and policy makers to develop, implement and track the progress of evidence-based alcohol policies.³⁸

WHO recommends that to provide a more comprehensive picture of alcohol consumption, well-conducted population level surveys need to be complemented by alcohol sales data.³⁹ Alcohol consumption for NSW is available through population level surveys such as the *National Drug Strategy Household Survey*. However, while national estimates of per capita consumption (which is primarily based on tax system data) are available, NSW specific data cannot be extricated from this.

Further data is also required on alcohol-related harms. Data on alcohol-related harms comes from a number of sources including police data, hospital data and ambulance data. This information needs to be effectively coded and recorded for evaluations to appropriately determine the impact of policies on changes in alcohol consumption and also changes in alcohol-related harms.

FARE proposes that the NSW Government:

- i. resume the collection and publication of alcohol sales data in NSW and makes this data available to the National Alcohol Sales Data Project and other relevant agencies and research bodies; and
- ii. work collaboratively to improve processes for the collection and coding of alcohol harms data including data from ambulance services, hospitals and police.



10. Measure, evaluate and improve

Evaluation processes should form an integral part of the implementation of any alcohol-related policies. Without an appropriate evaluation framework in place, the efficacy of trials and policy initiatives cannot be properly assessed. This results in a loss of valuable information that could be used to assess the effectiveness of a new policy and to guide future policy directions.

Data collection is a fundamental tool in the evaluation process. Strong reliable data enables a more complete analysis of the impacts of alcohol policies on the relevant outcome measures. One correlate of alcohol-related harm is per capita consumption, which is best measured by alcohol sales data.

As Don Weatherburn, the Director of the NSW Bureau of Crime Statistics and Research (BOCSAR) recently said 'If you want to avoid going round in circles, base your policies on evidence and evaluate what you do'. In this case the evidence is clear – we just need to act on it.⁴⁰

FARE proposes that the NSW Government develop an evaluation framework for the assessment of alcohol-related policy reforms and undertakes or funds independent evaluations of them as they are implemented.



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About the Foundation for Alcohol Research and Education

The Foundation for Alcohol Research and Education (FARE) is an independent charitable organisation working to prevent the harmful use of alcohol in Australia. Our mission is to help Australia change the way it drinks by:

- helping communities to prevent and reduce alcohol-related harms
- building the case for alcohol policy reform and
- engaging Australians in conversations about our drinking culture.

Over the last ten years FARE has invested more than \$115 million, helped 750 organisations and funded over 1,400 projects addressing the harms caused by alcohol misuse.

FARE is guided by the World Health Organisation's *Global Strategy to Reduce the Harmful Use of Alcohol*¹ for addressing alcohol-related harms through population-based strategies, problem-directed policies, and direct interventions.



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