



-Submission on the Auckland Council draft Long Term Plan-

21st March, 2012

Alcohol Healthwatch is an independent charitable trust working to reduce alcohol-related harm. We are contracted by the Ministry of Health to provide a range of regional and national health promotion services. These include: providing evidence-based information and advice on policy and planning matters; co-coordinating networks and projects to address alcohol-related harms, such as alcohol-related injury, fetal alcohol spectrum disorder, supply to minors and tertiary student drinking; and co-coordinating or otherwise supporting community action projects.

We welcome the opportunity to provide comment on the draft Auckland Council's Long Term Plan.

Our comments are limited to those relating to alcohol – our area of interest and expertise, and in particular they relate to the pressing need to reduce alcohol-related harm in order to achieve the vision for Auckland to be the world's most liveable city.

We would like to present an oral submission also if such an opportunity arises.

If you have any questions on the comments we have included in our submission, please contact:

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Introduction

We have worked in conjunction with the Manukau Alcohol Action community group to formulate our submissions to the draft Auckland Council planning documents. Although there are similarities between both of our submissions, we are not apologetic as it is clear what works to decrease alcohol-related harm.

In our written submission to the draft Auckland Plan we made the following series of recommendations:

Achieving the Vision

In order to achieve the vision and goals of The Auckland Plan we will need to act with courage, with strategic vision and proactively plan to reduce alcohol-related harm.

Therefore we recommend that the Auckland Plan include provision for the following;

- 1) That Auckland Council adopts a specific goal to reduce alcohol-related harm; that it commits to an evidence-based approach and develops, implements and monitors the effectiveness of a Local Alcohol Policy/Alcohol Harm Reduction Plan; that it engages collaboratively with other Auckland stakeholders in doing so. This plan must go beyond that of a liquor licensing policy.*
- 2) That Auckland Council integrates its planning for alcohol-related harm reduction across all Council domains and expects its Council Controlled Organisations to do the same; and identifies opportunities for mutually supportive strategies and efficiency.*
- 3) That Auckland Council is a strong advocate for evidence-based healthy public policy towards reducing alcohol-related harm and empowering its communities to respond to alcohol-related issues. That matters outside of local control such as price, marketing, sale and supply of liquor, blood alcohol levels for driving, increased use of early and brief intervention strategies, and adequate provision of treatment and rehabilitation options be considered for advocacy action.*
- 4) That Auckland Council utilises health impact assessments on its key planning and policy decisions across all aspects of its operations, and that alcohol is a mandatory component of these assessments. This will require a strengthening of our information base.*
- 5) That Auckland Council supports community action initiatives to reduce alcohol-related harm and includes specific initiatives to reduce alcohol-related;*
 - a) Injury including those resulting from drink-driving, drowning, falls,*
 - b) Violence and crime,*
 - c) Availability and promotion*
 - d) Early onset of drinking by young people,*
 - e) Heavy drinking/intoxication,*
- 6) That Auckland Council includes assessment of risk, and evidence-based harm reduction strategies in the planning of all events it manages or sponsors,*
- 7) That Auckland Council develops and implements a policy to ensure that there is no alcohol promotion on Council properties or Council (CCO) operated services. This includes sports and recreational facilities, buses, bus stops/stations and other public transport facilities.*
- 8) That Auckland Council ensures its delivery of liquor licensing, monitoring and compliance is of the highest possible standard, and that community stakeholders are informed and supported to be engaged in determining licensing decisions, particularly in relation to the location, number and density of liquor outlets and the performance of these outlets in relation to their*

legal obligations of their liquor licence, in particular supply to minors, supplying to intoxication and promotions.

- 9) *That Auckland Council works in collaboration with and supports other enforcement agencies to enhance the enforcement of liquor laws and monitoring of licensed premises and events.*
- 10) *That Auckland Council actively supports and facilitates involvement in planning for alcohol by young people; and supports leadership and capacity building amongst young people particularly through innovative technology approaches.*

More generally we support the Auckland Council to:

- 1) *Take a 'health promoting' approach in its engagement with community. We see opportunities and benefits in supporting not just schools but other community resources such as sports clubs, cultural and leisure centres in providing safe environments for children, young people and their families to meet and connect. These facilities can be active promoters of healthy lifestyles while de-emphasising the role of alcohol and other harmful substances/activities.*
- 2) *Take a stronger preventative approach, such as 'building in' safety and well-being as opposed to being complicit in problems and then using rate-payers money to clean up the resulting harms.*
- 3) *Be innovative in creating a new meaning for a "vibrant" and "dynamic" city. This does not have to revolve around late night drinking and partying. The night time and tourist economy can instead focus on our unique and beautiful land, people and culture.*
- 4) *Be innovative in integrating its planning and delivery mechanisms toward mutual long term gains. For example; reduced alcohol-related harm can help to achieve improved social connectivity, improved educational outcomes, improved productivity, improved health and well-being. These things in turn help to reduce alcohol-related harm.*

At our oral submission on the draft Auckland Plan we pointed out why these recommendations needed to be included in the planning towards Auckland being the World's Most Liveable City. In particular, we pointed to the existing conflicts between community interests and those of commercial interest groups. Without clearly expressed principles and agreed community health and safety goals/targets, we will still have alcohol causing intolerable levels of harm on individuals, families and communities in 30 years time. We received a very strong affirming response from Councillors to our oral submission, which we presented in conjunction with the Manukau Alcohol Action Group. Following the submission we were invited by a Council officer to contribute some targets to be included in the Plan. We were not supplied with a timeline, but of course we hoped to be timely with our input. Due to the nature of community group dynamics and the onset of the holiday period we weren't as timely with our response as hoped. However we did present some targets as soon as possible on the 1st February 2012. These are included below for your reference:

Transformational shift:

A preventative, evidence based and coordinated approach to minimise alcohol-related harm.

Chapter 1 - Priority 2: Improve the education, health and safety of Aucklanders, with a focus on those most in need

Suggested targets:

1. *By 2020, the average age that young Aucklanders start drinking alcohol is older than the national average.*
2. *Rates of risky drinking by Aucklanders are lower than the comparable national average. E.g. lower rates of heavy drinking, drinking during pregnancy and drinking and driving*
3. *An evidence based regional alcohol harm reduction plan is developed in collaboration with regional stakeholders by the end of 2012.*

Priority under the Southern Initiative

A sustainable reduction of alcohol-related harm rates in South Auckland.

NB. Measures will be alcohol-related violence, crime etc

Council officers have since followed up and advised that our targets were too late to be included – despite never giving us a specific deadline.

We find this unacceptable, as we were very aware that strengthening the Auckland Plan on alcohol matters was clearly an expectation of Councillors present at the hearings. We are now lacking some specific targets for the Auckland Long Term Plan to start working towards.

We don't believe our previous recommendations have been adequately responded to and we would like to ask that this be addressed, if not within the Auckland Plan, then in the Long Term Plan. In addition, we were greatly disturbed by the general tenor of the feedback on the targets. This indicated to us that rather than visionary, progressive thinking, the Council seems to be constrained by limited and out of date thinking and worn out excuses for inaction.

In June last year, Alcohol Healthwatch facilitated a forum in conjunction with the Auckland Council, with the aim of informing the planning and policy team on what should be included in the proposed Alcohol Framework and Programme. Over one hundred delegates attended the forum representing a range of organisations and sectors; including Local Board members, Community Safety, Treatment/Addiction, Injury Prevention, Policy/Planning/Research, Social Services and Health Promotion/Community Action disciplines.

Delegates were very clear with their expectations of Auckland Council in reducing alcohol-related harm. They wanted the Auckland Council to be bold and take leadership around the alcohol issue, advocate strongly to central Government for stronger alcohol laws, develop a robust and comprehensive alcohol policy, integrate planning for alcohol-related harm throughout the various facets of Council and engage and collaborate with the alcohol harm reduction sector. They also expected events organised by the Council to be alcohol-free and alternative sponsorship and/or funding to be provided or sought out by Council. Supporting the establishment of regional databases to measure alcohol harm indicators was an additional expectation.

Given that these expectations from the wider sector were so strong and clear, it makes it even more disappointing that thus far the Auckland Council planning process fails to include any concrete measures to make a real and measured difference to alcohol-related harm in Auckland. Auckland Council's draft Long Term Plan, like the Auckland Plan before it, recognises that alcohol and hazardous drinking is a problem and alcohol control policies are needed, yet set out no meaningful strategies or performance measures for addressing this. The few performance measures noted on

page 57 of Volume 2 concerning “the percentage of customers satisfied with the food and liquor licensing service” and “the percentage of liquor licensed premises inspected at least once a year” are at best a joke. At worst they are an insult in response to the gravity of community concerns about the impact of alcohol on our communities.

We found no mention of evidence-based policies or interventions, no mention of how the Local Boards who have included alcohol-related activities in their Local Plans will be supported to achieve their goals and objectives. Overall there is no mention of Council’s commitment, beyond rhetoric, to seeing a reduced level of alcohol-related harm in Auckland.

We urge the Auckland Council to act on reducing alcohol-related harm now. We have the evidence, we know what works, now we just need to act. We cannot afford to wait for the Alcohol Reform Bill to be enacted. Currently, the Bill is sitting in the Committee stage in Parliament awaiting its third reading. It seems to have slipped down the priority list within the House so we are unsure of when the third reading is actually going to take place. Subsequently there will be a 12 month implementation time for any of the laws to take effect which is just too long to wait.

We were lucky enough to recently attend the Global Alcohol Policy Conference in Thailand. It was made very clear that we already have the evidence of what works to address alcohol-related harm, we now just need to act. The Global Alcohol Strategy provides a solid foundation for national and local strategy and planning and there was much work done at the Conference to translate the strategies included in the Global Strategy to local level action. We would be very happy to share these learning with the Auckland Council.

We have worked in conjunction with the Manukau Alcohol Action Group to develop the following measurable outcomes and evidence based strategies. We ask that they be included in the Auckland Long Term Plan as performance measures, and the strategies expressed in the second table adopted, as they represent the pathway to creating safer and healthier communities.

By 2022 Aucklanders would have achieved....

Expected measured outcomes
Reduced number/rate of alcohol-related admissions to Auckland hospitals – both acute and chronic outcomes).
Reduced number/rate of alcohol-related assaults (and/or nearest proxy such as night-time assaults) in Auckland.
Reduced number/rate of alcohol-related ED presentations (and/or ED presentations overall) in Auckland hospitals.
Reduced number/rate and severity of alcohol-related road crashes, and number of deaths and injuries resulting in the Auckland region.
Reduced number/rate of alcohol-related treatment episodes (or approximate proxy) in Auckland.
Reduced number/rate of alcohol-related ambulance call-outs in Auckland.
Reduced number/rate and severity of alcohol-related domestic violence episodes in Auckland.

Reduced number/rate of alcohol-related criminal offending and recidivist offending.

Strategies to achieve expected outcomes

Overarching policy and planning strategies

1. Auckland Council make a principled commitment to and actively advocate for the protective national policy measures of:
 - Increasing the price of alcohol by raising the excise tax on alcohol products
 - Restrict access to retailed alcohol by decreasing the number of liquor outlets and opening hours
 - Enforce bans on alcohol advertising
 - Lower the legal adult blood alcohol level for driving to at least 0.05
 - Raise the minimum purchase age to 20 years for both on-licence and off-licence premises.
2. Auckland Council develops its capacity to be an effective contributor to developing, implementing and monitoring an evidence-based alcohol harm reduction plan for Auckland.
3. Auckland Council develops a progressive and evidence-based local alcohol policy that contributes directly to the outcome measures (as stated in the above table).
4. Alcohol-related harm prevention to be integrated across Auckland Council and its CCOs planning initiatives, for example through Auckland Transport, Environment, Urban planning, ATEED, and Community Safety. An alcohol-specific health impact assessment/checklist could be developed to assist this process.

Liquor Licensing Strategies

5. Auckland Council develops and maintains a geo-spatial database of licensed premises for the Auckland region and this will be made readily accessible to Local Boards and community stakeholders.
6. Apply a graduated response model to liquor licensing monitoring (like the model that the Collaborative Liquor Enforcement Group (CLEG) uses).
7. All premises to have compliance monitoring visits at least twice a year.
8. Problem premises to have covert compliance monitoring visits at least monthly until enforcement action is taken or the problems are otherwise resolved.
9. Investigate the 'two-strikes-out' policy for non-compliant licensees.
10. All new/renewal licence applications are notified to the applicable Local Board.
11. Risk management plans are in place for the Central Business District (CBD) and other areas of licensed premise clustering, and for all premises operating beyond midnight.
12. Auckland Council to work to eliminate the necessity for communities to object to liquor licences in the Auckland region, i.e. effective policies are in place to limit the number, location and density of outlets and to rid the region of poor operators.

Event Management Strategies
<p>13. Auckland Council run events will where possible de-emphasise the role that alcohol plays in the event (for example, the Seafood Festival is about the seafood and not about the booze up).</p> <p>14. All Auckland Council run family-orientated events are alcohol-free.</p> <p>15. Other events run by, or in conjunction with, the Auckland Council and its CCOs involving alcohol have comprehensive safety audits prepared and risk management plans in place.</p> <p>16. Auckland Council, in conjunction with youth friendly service organisations, develops and implements a greater range of youth recreational options that are alcohol-free.</p>
Marketing Strategies
<p>17. No alcohol advertising on Auckland Council property, particularly sports fields, bus shelters and transport hubs.</p> <p>18. Auckland Council to actively seek/provide alternative sponsorship for Council planned events/activities.</p>
Role Model Employer Strategies
<p>19. Auckland Council to play a leadership role in de-emphasising alcohol and promoting social options that are alcohol-free.</p>
Transport/Road Safety Strategies
<p>20. Auckland Council advocates for a legal adult driving blood alcohol level of 0.05 or less.</p> <p>21. Auckland Council continues to improve public transport, particularly in rural areas, to provide accessible transport options for people who have been drinking alcohol.</p> <p>22. Auckland Council actively monitors liquor outlets to ensure compliance with liquor laws and host responsibility measures; ensuring patrons do not become intoxicated and do not drive home.</p> <p>23. Auckland Council delivers, through Auckland Transport/Road Safe Auckland, evidence-based campaigns to reduce drunk driving and recidivist drunk driving levels in Auckland; including the marine environment and pedestrian safety.</p> <p>24. Auckland Council works with regional partners to increase the delivery of brief/early intervention programmes for drink drivers, and supports successful implementation of the Drug Court pilot in Auckland.</p> <p>25. Auckland Council effectively monitors public transport to enforce liquor bans, and also work towards all public transport services being alcohol-free in the Auckland region.</p>
Liquor Bylaw Strategies
<p>26. Auckland Council ensures that liquor bylaws are implemented consistently across the region, they are outcome monitored to ensure they achieve their purposes (such as improving community safety), and that they are enforced, active, visible and non-discriminatory.</p>

Community Action Strategies

27. Community Action/Community Safety/Education programmes are evidence-based, and developed and measured against key performance indicators such as the outcomes provided in the above table.
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In conclusion, we wholly believe that to truly achieve the Auckland Council's vision and goals of both the Auckland Plan and the Long Term Plan, it is imperative that these outcome measures and strategies to reduce alcohol-related harm in Auckland are built into the planning documents.

We look forward to working with you to achieve your vision and to make a measurable difference in reducing alcohol-related harm in the Auckland region. In turn, we will see healthier, happier, safer individuals, families and communities with the resources to contribute to a prosperous and liveable Auckland.