

Opening statement

Alcohol Action Ireland, *the independent advocate for reducing alcohol harms*, welcomes the opportunity to contribute to the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media Night-time Economy Stakeholder Consultation Process.

We appreciate the complexity of the task involved with developing policy recommendations and practical measures for an emergent, vibrant and sustainable night-time culture and economy.

We are pleased that government recognises the benefits for citizens and visitors of a vibrant Night-time Economy (NTE) and hope that our contribution to the taskforce's work will add a perspective that is equally important to the wellbeing of our citizens and visitors.

We note, with some disappointment, that neither the Department of Health or the HSE are Members of the Taskforce convened. This is particularly relevant given that public health policy, enshrined in legislation, commits to reducing alcohol use in Ireland. Given the absence of a public health voice within the Taskforce, it is incumbent that its work identify steps, which ensures any recommendations proposed do not act against the objectives of public health policy.

While many of the most exciting cultural and creative activities happen at night there is also the normalisation of a social norms that none can be enjoyed, or sustained, without the accompaniment of alcohol.

The continuing visible presence of alcohol in most cultural experience is detrimental to new understanding that seeks to ensure our children can go about their lives without being regularly exposed to alcohol promotion.

One major opportunity for the work of this taskforce should be to challenge this perception and reframe the integrity of the cultural expression beyond a commercial caricature. An expansion of the night time economy cannot become a further commercial opportunity to embed a fabricated concept that alcohol use is central to our cultural experience. Neither should such an expansion of night time activities be advanced on the necessity of easier, or greater, access to alcohol.

While Alcohol Action (AAI) recognise that the current regime of regulations and licensing laws are undoubtedly arcane and as such opportunistic, it is also our view that any proposals to liberalise, or reform, such a regime must adequately reflect the potential impact of further liberalisation on public health and safety.

In 2005, the UK, introduced the Licensing Act 2003 which relaxed licencing laws and amended trading hours and in theory allowed for 24-hour sale of alcohol.

The measure, which was hoped would result in ‘staggered closing times’, was presented as means of reducing violence and disorder at fixed, peak closing times, one of the overarching aims of the Act¹. However, to date there is no compelling evidence to suggest that alcohol related crime has reduced or changed as a result of the measures^{2 3}.

Since the introduction of that legislation, changes observed include the shifting of crime and disorder further into the early hours, a subsequent strain on police resources, and a perceived increase in pre-loading⁷. It has also been observed that the parallel infrastructure needed to manage the night-time economy - i.e. policing, enforcement, street cleaning, facilities, monitoring and decision-making by local authorities - was largely overlooked and under resourced^{5 4}. In 2014-2016 in England and Wales, alcohol-related violent incidents made up 67% of violent incidents which take place at the weekend and 68% of those which take place during the evening and night⁵. There is no comparable dataset for Ireland.

Two Australian studies^{6 7} found that late trading was associated with increased levels of alcohol consumption in and around Perth ‘public houses’ during the period following the introduction of extended trading permits.

Chikritzhs and Stockwell’s⁵ Perth study showed a 70% increase in assaults in premises with later trading (1 or 2 additional hours of trading after midnight) and late trading was associated with both increased violence in and around Perth ‘public houses’ during the period following the introduction of extended trading permits.

¹ Licensing Act 2003 <http://www.legislation.gov.uk/ukpga/2003/17/contents>

² Has the Licensing Act 2003 affected violence rates in England and Wales? A systematic review of hospital and police studies <https://www.ingentaconnect.com/content/wk/ejeme/2018/00000025/00000005/art00002>

³ Evaluating the Impact of Flexible Alcohol Trading Hours on Violence: An Interrupted Time Series Analysis <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0055581>

⁴ <https://www.telegraph.co.uk/news/2017/04/03/twenty-four-hour-drinking-has-led-surge-violent-crime-city-centres/>

⁵ Office for National Statistics (2017) [Overview of violent crime and sexual offences](#)

⁶ Chikritzhs, T., & Stockwell, T. (2002). The impact of later trading hours for Australian public houses (hotels) on levels of violence. *Journal of studies on alcohol*, 63(5), 591-599.

⁷ Chikritzhs T and Stockwell T (2006) The impact of later trading hours for hotels on levels of impaired driver road crashes and driver breath alcohol levels. *Addiction* 101(9):1254–64

Similarly research from Norway in 2012 suggested that each additional 1-hour extension to the opening times of premises selling alcohol was associated with a 16% increase in violent crime.⁸

A study from New Zealand also found that greater geographic access to alcohol outlets was associated with increased levels of serious violent offending across study areas.⁹

In Ireland, An Garda Síochána have already highlighted an increase in alcohol-related offences, which they attribute to a buoyant night-time economy. In 2017, Gardaí reported that public drunkenness offences in Dublin were 40 per cent higher than in 2016, and that public-order crime had increased 14 per cent.¹⁰ In 2019, Deputy Commissioner Twomey, said that number of crimes against the person, including assaults, tends to increase in the summer months, which he believed was related to the use of alcohol.

Alcohol-related presentations are already a significant burden on EDs and ambulance services, especially in the early hours of Sunday mornings.¹¹

A data collection system, based on the ‘Cardiff model’ - a means of centrally collecting and sharing data from hospital emergency departments and police to inform policy development and improve strategies to reduce alcohol-related harm – could be developed.

Cardiff developed the model to help reduce the number of assault patients seeking ‘Accident and Emergency’ treatment by 35 per cent within five years. Such a system would provide baseline data around night-time alcohol-related harm and violence, and would be an invaluable tool to measure the effect of any changes to licensing laws.

Ireland has a difficult experience with alcohol use. Over the last 50 years, Ireland has witnessed a hugely positive social and economic transformation that has ensured our citizens have enjoyed both greater personal freedoms and prosperity through sustained economic liberalisation. However, through all of this transformative period in our history, a consequence has been that our alcohol use has trebled. The costs of the alcohol related harm to our society are enormous with an estimated 2,790 lives lost every year; €3.6 billion public expenditure deployed to mop up the waste while 200,000 children sit in homes traumatised by continued presence of parental alcohol misuse.

⁸ Rossow, I., & Norström, T. (2012). The impact of small changes in bar closing hours on violence. The Norwegian experience from 18 cities. *Addiction*, 107(3), 530-537. <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1360-0443.2011.03643.x>

⁹ Day, P., Breetzke, G., Kingham, S., & Campbell, M. (2012). Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand. *Australian and New Zealand journal of public health*, 36(1), 48-54.

¹⁰ <https://www.irishtimes.com/news/crime-and-law/alcohol-related-crime-booms-in-dublin-as-nightlife-picks-up-1.3291974>

¹¹ McNicholl B, Goggin D, O’Donovan D Alcohol-related presentations to emergency departments in Ireland: a descriptive prevalence study *BMJ Open* 2018;8:e021932. doi: 10.1136/bmjopen-2018-021932

In conclusion, Alcohol Action reminds the taskforce that public policy seeks to reduce alcohol use and address the normalisation of alcohol throughout our society, and urges it to safeguard that any 'unlocking' of a vibrant Night-Time Economy, does not come with the consequences of even greater harm to our citizens.

We wish the Taskforce well in its work and remain available to it for any further consultation, or clarification, on the matters we have outlined.

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Brief responses to the questions outlined.

1. What do you see as the key attributes of a positive night time economy? What does the best case scenario for you (as a group) look like?

Alcohol Action (AAI) accepts that reform of licensing laws may be required but that a public health approach test should be applied to all license applications to ensure that minimisation of harm should have the equivalence of any cultural or economic imperatives.

A 'best case scenario' should be that while applicants enjoy a more efficient process, the interests of public health and safety and the protection of local communities is assured.¹² Additionally, and complimenting this development, Section 4 of the Public Health Alcohol Act must be commenced.

A healthy NTE should facilitate a programme of cultural experiences throughout rural and urban areas, with improved public transport by night and planning and licensing to support culture expression within a non-alcoholic social space. Equally, the taskforce must recognise the ever expanding 'New Irish' multi ethnic, cultural diverse communities who do not accept alcohol at the heart of its cultural experience.

2. What cultural, creative or other activities are currently missing from the night time economy?

AAI supports the concept of wider night-time activities that are not alcohol centric and would like to see proposals that support such a night-time landscape.

For example, attractions could include unlicensed cafes and food-market pop-ups, museum and gallery openings, theatre performances and other outdoor events.

¹² See: Foster, J., Harrison, A., Brown, K., Manton, E., Wilkinson, C. & Ferguson, A. (2017). Anytime, anyplace, anywhere? Addressing physical availability of alcohol in Australia and the UK. London and Canberra: Institute of Alcohol Studies and the Foundation for Alcohol Research and Education.

3. What are the challenges for your particular group and others? Any suggested solutions?

From a public health perspective, AAI believes that any measure that potentially puts additional pressure on our frontline emergency services such as ambulance, police and fire services places a serious challenge to the consequences of a liberalised night time economy that facilitates the sale of alcohol later into the night.

AAI believes that such a move would be incongruent with the public health objectives of the Public Health Alcohol Act which seeks to reduce the harm caused by alcohol that costs the exchequer vast amounts of public monies.¹³

4. What in your view is a best practice example of a successful night-time economy internationally and/or are there international examples we can draw from?

Evidence from other jurisdictions is not encouraging. As set out in our statement, the research literature shows that a liberalisation of regulations and licensing laws to expand a night-time economy hold significant consequences, with high levels of intoxication and alcohol-related harm, including violence, road traffic incidences, public disorder and unintentional injury.¹⁴

¹³ For a full overview of the costs of alcohol to the exchequer see analysis here: <https://alcoholireland.ie/facts/alcohol-and-costs/>

¹⁴ Bellis MA, Hughes K. Getting drunk safely? Night-life policy in the UK and its public health consequences. *Drug Alcohol Rev.* 2011 Sep;30(5):536-45. doi: 10.1111/j.1465-3362.2011.00290.x. PMID: 21896076. See also: Hadfield, P., & Measham, F. (2015). The outsourcing of control: Alcohol law enforcement, private-sector governance and the evening and night-time economy. *Urban studies*, 52(3), 517-537. <https://journals.sagepub.com/doi/pdf/10.1177/0042098014554540>

¹⁴ Rossow, I., & Norström, T. (2012). The impact of small changes in bar closing hours on violence. The Norwegian experience from 18 cities. *Addiction*, 107(3), 530-537. <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1360-0443.2011.03643.x>

¹⁴ Day, P., Breetzke, G., Kingham, S., & Campbell, M. (2012). Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand. *Australian and New Zealand journal of public health*, 36(1), 48-54.