



Alcohol Action Ireland
submission to the
public consultation on
the development of the
Department of Justice
Statement of Strategy
2025 - 2028

MAY 2025

About us

Alcohol Action Ireland (AAI) is the national independent advocate for reducing alcohol harm. We campaign for the burden of alcohol harm to be lifted from the individual, community and State, and have a strong track record in effective advocacy, campaigning and policy research.

Our work involves providing information on alcohol-related issues, creating awareness of alcohol-related harm and offering policy solutions with the potential to reduce that harm, with a particular emphasis on the implementation of the Public Health (Alcohol) Act 2018. Our overarching goal is to achieve a reduction in consumption of alcohol and the consequent health and social harms which alcohol causes in society.

AAI contributed to the development of 'Connecting for Life' and we are very pleased to provide input to Ireland's next suicide reduction policy.

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Introduction

Alcohol Action Ireland is pleased to contribute to this important consultation. The Department of Justice has a unique role to play in relation to reducing the multiple impacts of alcohol harm in Ireland given its functions in relation to policing, criminal justice and also the regulation of the sale of alcohol.

Our response sets out research findings and makes recommendations across areas including public order, assaults, domestic, sexual and gender-based violence (DSGBV) and road safety. We also highlight specific issues in relation to the protection of children and young people.

Key to addressing these issues is to work coherently with other government departments to bring about a reduction in the whole-of-population alcohol consumption. This preventative approach includes actions around controls on pricing, marketing and availability which are highlighted by the World Health Organization as key to addressing the harms from alcohol.[1]

It is vital that services in areas such as addiction treatment, child protection and domestic violence are coordinated. It is also essential that there is full enforcement of the laws around the sale and supply of alcohol as well as drink driving.

We would very much appreciate an opportunity to meet with Department of Justice officials to discuss these issues, many of which are overlapping in nature.

Alcohol and crime

The Department of Justice 'Statement of Strategy 2024-2026' had a vision of a safe, fair and inclusive Ireland, with the Programme for Government underlying this commitment by stating, "Everyone has a right to be safe and to feel safe in their community and in their home."

Alcohol Action Ireland wholeheartedly agrees with the vision of the Department of Justice and the commitments to justice in the Programme for Government. Unfortunately, however, for some people in Ireland neither their community nor their home is a safe place due to the harms generated by alcohol consumption.

Alcohol and crime have a closely interconnected relationship, with alcohol consumption being a contributing factor to crime and antisocial behaviour. Alcohol plays a key role in crimes such as public order offences, domestic violence, assault and murder, as well as rape and sexual assault. It is not always possible to tell the exact number of crimes caused due to alcohol use, but studies have estimated that between 30% and 65% of assaults, disorderly conduct, public order, and other social code incidents are associated with alcohol-use. [2]

Despite this litany of offences there is a paucity of prosecutions in relation to breaches of licensing regulations. [3] For example, there are no breaches at all recorded in the period 2014-2024 in relation to serving alcohol to intoxicated persons, despite multiple high-profile cases of assaults outside pubs.

Moreover, the OECD and WHO estimate that for Ireland the costs of alcohol harm are of the order of about 1.9% - 2.5% of GDP.[4] Therefore, for Ireland the cost of alcohol harm would equate to approximately €9.6bn-€12bn annually. These costs relate to health care, crime, traffic crashes and loss of productivity with crime around 11% of the total. Applying this analysis to Ireland suggests that alcohol related crime costs the state over €1bn annually.

If we are to maintain a safe and secure Ireland, then the Department of Justice must confront the realities of alcohol driven crime and violence.

Alcohol and Domestic, Sexual and Gender-based Violence (DSGBV)

The Department of Justice 'Statement of Strategy 2024-2026' rightly called domestic, sexual and gender-based violence (DSGBV) "a cancer in our society" and reinforced the Department's commitment to "strive towards zero tolerance in society towards domestic, sexual, and gender-based violence". Furthermore, the Programme for Government stated that "Tackling the epidemic of domestic, sexual and gender-based violence will remain a major priority for the Government".

Eradicating DSGBV is also a priority for AAI. Central to our efforts to drive change in this area is raising awareness regarding the accelerating effect alcohol plays in DSGBV. Alcohol is not, and never will be, an excuse or explanation for domestic violence. However, it is a known driver of domestic violence. [5]

The consistent link between alcohol and domestic and gender-based violence has led to the recognition of alcohol as a "risk factor" for intimate partner violence by the World Health Organisation. Indeed, past national research found that alcohol was a factor in up to 70% of cases of domestic violence against women. However, despite all this evidence, the current National Strategy in this area does not make any mention of alcohol at all.[6]

Parental Problem Alcohol Use

Studies have found that there is a serious risk that parents with alcohol problems may neglect their children. Such neglect can have a negative impact on children's emotional and physical development and education, and put them at risk of physical and sexual abuse.[7] A UK survey by the National Association for Children of Alcoholics found that people who had experienced parental alcohol misuse were more likely to consider suicide, have eating disorders, drug addiction, and be in trouble with the police, as well as having above average alcohol dependency and mental health problems.[8]

Data from the Child Care Law Reporting Project has found that drug and alcohol abuse feature in 1 in 5 cases in child care cases that come to court, while alcohol was identified as a risk factor in three quarters of Irish teenagers for whom social workers applied for admission to special care - a secure care environment requiring a court order to detain a young person to protect them. [9]

Alcohol in the home was named as a key child welfare issue in the Report of the Independent Child Death Review Group as it was an issue in one third of the cases of unnatural deaths reviewed. It was the second most prevalent issue after neglect and twice as prevalent as drugs in the home.[10] It was also a key feature of a report by Dr Geoffrey Shannon regarding Garda powers to take young people into care in emergency situations.[11]

Given the weight of such evidence of the role alcohol in domestic violence it is essential that this must be addressed in any new strategy in this area.

Recommendations

- Ensure close co-ordination across multiple agencies in relation to services such as addiction, child and family services, domestic and sexual violence supports.
- As a matter of urgency, implement ‘Operation Encompass’, a police-led, school-based early intervention safeguarding scheme to support children and young people who experience domestic abuse, across all schools in Ireland.[12]

Alcohol and the Criminal Justice system

The Programme for Government gives a commitment to establish a high dependency unit in the Irish Prison Service to address severe addiction challenges as well as to implement the recommendations on the Taskforce on Mental Health and Addiction. The 2024-2026 Statement of Strategy outlined the need to ensure adequate space in Irish prisons.

Alcohol is often a feature in crimes such as public order offences, assault and murder, as well as rape and sexual assault, and there has been a large increase in all alcohol related crime since the early 1990s. Therefore, it is little wonder that Irish research has found that 'drugs and alcohol dependence and harmful use were by far the most common problems in prisons, present in between 61% and 79% of prisoners. [13]

Foetal Alcohol Spectrum Disorders (FASD)

Another issue is the over-representation of people with Foetal Alcohol Spectrum Disorders (FASD) in the justice system. Pre-natal exposure to alcohol can leave children compromised from a neurobiological perspective, resulting in problems carried with them throughout their lives.

Ireland has one of the highest rates of FASD in the world with estimates that it affects up to 7% of the population in Ireland.[14] Research shows that people with FASD are overrepresented in care and justice systems.[15] People with FASD have diminished awareness of the consequences of their actions; and have difficulty adhering to rules and structure. Standard conditions of bail or probation, for example, pose a challenge to those with FASD with the result that parole conditions are regularly broken resulting in readmission to detention.[16] A comprehensive approach is needed to address this particular cohort of people.

Alcohol's contribution to offending behaviour in young people

When it comes to young people and offending, we know that in Ireland, alcohol is a factor in approximately half of all youth offending. Alcohol offences (e.g. underage drinking) are the main reasons for which children are referred to the Garda Youth Diversion Programme, accounting for almost a fifth of youth offences.[17] Furthermore, 85% of Garda Youth Diversion Programmes named alcohol-related crime as first on the list of offences committed in their area.

Public order, criminal damage, and to a lesser degree minor assault and trespass were the main offences committed when drinking.[18] It is clear from this weight of evidence that alcohol places a very heavy burden on our young people and is a very significant factor not just in offending but in the factors that lead young people to risk taking and ultimately offending.

Despite these known risks to young people from alcohol, there are very few prosecutions for providing/selling alcohol to minors. For example in 2024 there were only 54 breaches noted in relation to sale/serving of alcohol to minors.[19] This is a vanishingly small number given that data reported by the Health Research Board indicates that 59% of 15-year-olds have consumed alcohol in their lifetime.[20]

Recommendations

- Support the Irish Prison Service in delivering comprehensive addiction counselling services, treatment supports, while also ensuring these supports are holistic and joined up with community-based supports for prisoners when they leave the prison system.
- Furthermore, there is a need for the Department to ensure that alcohol is tackled in a comprehensive manner to reduce the role it plays in criminal offences and therefore reduces pressures on the criminal justice and prison system.
- Enforcement of current laws on the sale and supply of alcohol is essential.

Alcohol and drink driving

The Programme for Government gives a commitment to “crack down on dangerous driving” and reduce road deaths and create safer roads for everyone in Ireland. However, the section on road safety does not mention tackling drink driving or increasing roadside breath tests, despite the problem that drunk driving poses on our roads.

Alcohol impairment impacts road safety and drink driving is a major factor in road collisions and fatalities on the road. Recent analysis of coronial data (2015-2019) found that, where a toxicology result was available, more than one-third of road user fatalities in Ireland had been drinking prior to the incident.[21] Research from the RSA shows that one in 10 Irish motorists have driven after consuming alcohol in the last 12 months.[22] At the same time, Ireland has the lowest level of roadside breath testing in the EU.[23]

Given the level of road deaths it is also essential to look at all possible levers to reduce this toll. For example, there is clear evidence from EU countries that a 10% increase in alcohol pricing leads to a 7% drop in road deaths.[24] Such an approach requires working with the Department of Finance to seek an increase in excise duties which have not changed in over 11 years, meaning that alcohol is now much more affordable. Alcohol sold in supermarkets is actually 85% more affordable in 2024 than it was in 2004.[25]

Recommendations

- Gardai should be given the resources to significantly increase the level of road-side alcohol testing. In addition, it is essential to consider mechanisms other than just education, enforcement and disqualification to mitigate drink driving risk. We believe a diversion programme for all drink drivers can be an important mitigation measure in tackling drink driving.
- The Department of Justice should work with the Department of Finance to seek an increase in excise duties.

Alcohol and licensing

Despite the known harms from alcohol, and the fact that we can say with some confidence that more drinking tends to result in more violence, and less drinking tends to result in less violence, the Programme for Government gives a commitment to “Enact legislation to update our licencing laws, promoting the development of a modern and diverse night-time economy”.

Alcohol is no ordinary product, with the sale of alcoholic drinks controlled by laws which allow only licensed businesses to serve or sell alcohol. The Department of Justice plays a fundamental role in the availability and accessibility of alcohol through its role in the licensing process. In its oversight of the licensing system the Department of Justice can play a proactive role in either reducing or increasing alcohol related crime and violence, and the human and financial impact this has on the Department, the State, and society.

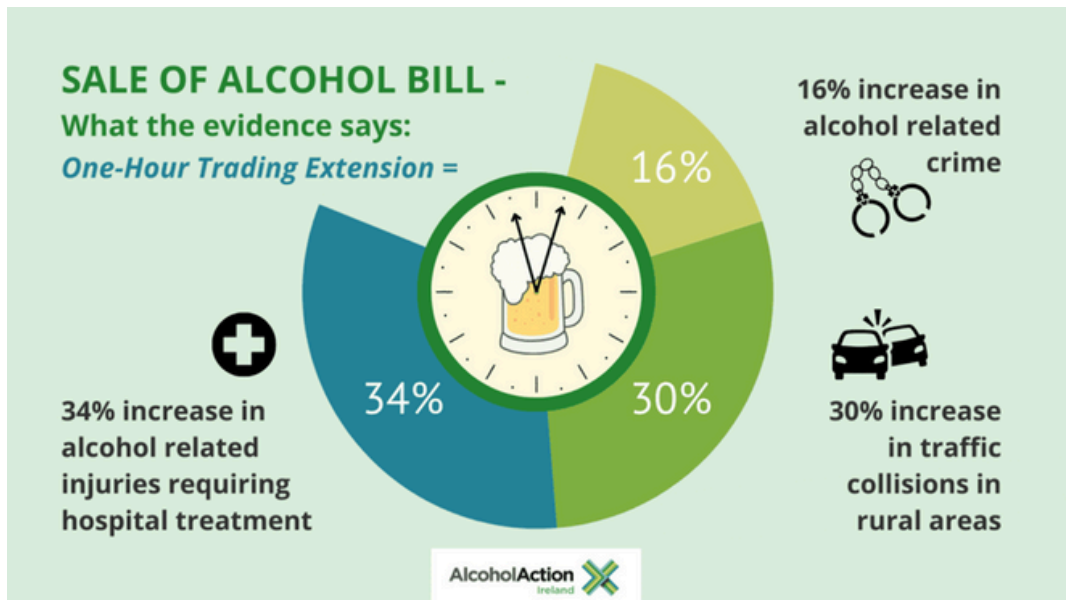
The Department of Justice can reduce alcohol related crime and violence by ensuring the licensing system looks at alcohol harm in holistic manner, or it can contribute to increasing alcohol related crime and violence by expanding licensing hours through legislation such as the Sale of Alcohol Bill. We know this to be the case because as opportunities (in space and in time) to purchase alcohol increase, so do levels of violence.[26]

Recommendations

- The Department of Justice must take a comprehensive look at harms from alcohol, especially the impact licensing plays in the accessibility and availability of alcohol and how this impacts in terms of alcohol related crime and violence.
- In particular, as recommended by the Oireachtas Justice Committee in its pre-legislative scrutiny of the Sale of Alcohol Bill, there should be a Health Impact Assessment of this bill.

Conclusion

Ignoring the presence of alcohol will not eliminate its role in crime and violence. On the contrary, the more we know about how alcohol affects crime and violence the better able we will be to develop effective prevention strategies and treatment responses.



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