

Submission to the Department for Communities
on the
Consultation on the sale and supply of alcoholic drinks at 'special events' in
Northern Ireland

03 May 2019



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1. Should the Department be given the power to designate an event as a “special event”?

There is insufficient detail on the criteria for considering an event a ‘special event’ to make a clear judgement on this matter.

In the absence of clarity, we would apply the precautionary principle in respect of public safety and health and recommend that the Department should not be given the power to designate an event as a special event at this time. We make this recommendation in the context of an extensive body of evidence linking increased alcohol availability and extended licensing hours with increased alcohol-related harms. We recognise that the current pattern of alcohol consumption in Northern Ireland is concerning and the current burden of health and social harms associated with alcohol remains substantial. This evidence is presented in detail in our submission to the Committee for Communities in 2016 (accompanying this response).

The consultation document makes no commitment to review and monitor the public safety and public health impact of any new licensing arrangement in relation to special events. As such, there is little reassurance that a system is in place to allow for retraction of powers in the event that public safety and health was harmed by the change in regulations.

In particular, the consultation document does not specify whether events primarily targeted at children and young people would qualify as a special event. For example, the MTV Music Awards is mentioned which might reasonably be considered an event with significant appeal and attendance by young people including those under the legal age for purchase of alcohol. Facilitating the sale and supply of alcohol at these events would be of particular concern as the consultation document makes no provision to provide additional protections for younger people from illegal sales and protect public safety of minors. Furthermore, the sale and supply of alcohol at youth focussed events is particularly inappropriate in the context of government commitments to denormalise alcohol use as a central feature of social, sport and cultural participation, as set out in Northern Ireland’s *New Strategic Direction on Alcohol and Drugs Phase 2*, the *Hidden Harm Action Plan* underpinned by the *Making Life Better Public Health Framework*.

Furthermore, the consultation document refers specifically to a number of high profile sporting events. We would question the return to society from a *de facto* policy of enhancing alcohol availability at sporting events. These provisions can build strong associations between particular sports and alcohol brands. There should be clear delineation between family-friendly sporting events and drinking occasions. Creating the conditions for excess alcohol consumption at sporting events can drive increases in anti-social behaviour and disrupt enjoyment and visitor experience. The consultation document does not specify how designated these events as a ‘special event’ contributes

to the goals and objectives of *Sport Matters - the Northern Ireland Strategy for Sport and Recreation 2009-2019*.

2. Should the Department be given the power to vary permitted hours at an event, having designated it as a special event?

There is no detail provided on the scope or nature of variation under consideration.

In the absence of clarity, we would apply the precautionary principle in respect of public safety and health and recommend that the Department should not be given the power to vary permitted hours at a special event at this time. We make this recommendation in the context of an extensive body of evidence linking increased alcohol availability and extended licensing hours with increased alcohol-related harms. We also consider that the current pattern of alcohol consumption in Northern Ireland is concerning and the current burden of health and social harms associated with alcohol remains substantial. This evidence is detailed in our submission to the Committee for Communities in 2016.

3. Should the Department be given the power to permit the sale of alcoholic drinks for consumption off the premises at a special event?

The consultation document does not commit to introducing any controls/ conditions in relation to the sale of alcoholic drinks for consumption off the premises at a special event. There is no consideration given to potential public safety and health outcomes from the provision of unlimited 'carry out' from a special event. We would be concerned that permitting the sale of alcoholic drinks for consumption off the premises would contribute to increased overall consumption as well as exacerbate the existing pattern of heavy episodic drinking in Northern Ireland. There is insufficient detail provided in the consultation document on the enforcement issues to be addressed in terms of controlling access by minors attending such special events.

With these considerations in mind, we do not recommend that the Department be given the power to provide for sales of this nature.

4. Should the Department be given the power to impose conditions on an event designated as a special event?

If the Department is given the power to designate a special event in the future, the Department should also be given powers to impose conditions on any such event.

The Department for Communities has committed that the number of events designated as 'special events' will be small. As such, it would seem appropriate and proportionate that for any conditions for a designated special

event should be jointly agreed with both the Department of Health and Justice, or their appropriate agencies or regional/local representatives. This will ensure a balanced consideration of the public safety and public health implications in the unique context of each special event. The needs and experiences of local communities should also be taken into account in decisions on conditions, to include consideration of how providing additional opportunities for alcohol consumption at events can impact on noise, public nuisance, safety and enjoyment of those living in the local vicinity.

These conditions could include actions relating to

- Restricting the availability of both lower price or high strength alcohol
- Restricting areas in the event premises and environs where alcohol can be consumed
- Restricting certain forms of alcohol promotions
- Restricting the use of certain marketing techniques, with particular regard to the vulnerability of children
- Training of event staff in issues relating to the supply of alcohol and appropriate response to acute alcohol-related issues
- Health and safety requirements relating to an increased likelihood of intoxicated persons
- Transport safety requirements relating to an increased likelihood of intoxicated persons
- Use of measures relating to personal and property safety relating to an increased likelihood of bodily harm and vandalism, including CCTV and policing.

The Department should work closely with colleagues in justice to enforce compliance with conditions and to systematically assess the community-level impacts of additional licensing hours or changes to licensing arrangements. These outcomes should be given at least parity of importance with the emphasis on economic and hospitality outcomes mentioned in the consultation document.

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