

# Opening Statement – Sale of Alcohol Bill 2022

## Introduction

Thank you for the opportunity to present evidence on this important legislation. The Institute of Public Health (IPH) submitted evidence to the Department of Justice on the Review of Alcohol Licensing<sup>1</sup> in January 2022 and to this Committee on the Bill in December 2022.

## Institute of Public Health – Who We Are, What We Do

The Institute of Public Health is a North South agency, founded in 1998 by the Departments of Health in Ireland and Northern Ireland and this year marks its 25<sup>th</sup> anniversary. IPH provides evidence to inform public policy with a focus on improving health equity and reducing health inequalities, including a long-standing focus on reducing alcohol harm and supporting evidence-based alcohol policy<sup>2,3,4,5,6</sup>.

## Declaration of Interest

IPH does not receive any direct or indirect financial assistance, or funding, or have any professional relationship with the alcohol industry, or any entity working to further its interests.

## Observations on the Bill

Before presenting observations on the ***Sale of Alcohol Bill***, I would like to provide some context in relation to the government's approach to reducing alcohol use and harms. Alcohol use remains high in Ireland and, in one way or another, alcohol-related harms affect most people in our society, whether they are drinkers or non-drinkers.

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<sup>1</sup> Consultation Response: Review of Alcohol Licensing in Ireland: <https://publichealth.ie/consultation-response-review-of-alcohol-licensing-in-ireland/>

<sup>2</sup> Alcohol-related harms in nightlife settings on the island of Ireland – A Knowledge Exchange hosted by the North South Alcohol Policy Advisory Group December 2020 (Institute of Public Health): <https://publichealth.ie/wp-content/uploads/2021/06/Alcohol-nightlife-settings-Final.pdf>

<sup>3</sup> North South Alcohol Policy Advisory Group – Proceedings from the Knowledge Exchange Forum: <https://publichealth.ie/north-south-alcohol-policy-advisory-group-proceedings-from-the-knowledge-exchange-forum/>

<sup>4</sup> Review of the New Strategic Direction for Alcohol and Drugs – Phase 2: [Review of the New Strategic Direction for Alcohol and Drugs – Phase 2 - Institute of Public Health](https://publichealth.ie/review-of-the-new-strategic-direction-for-alcohol-and-drugs-phase-2/)

<sup>5</sup> Submission to the Joint Oireachtas Committee on Health and Children on the Heads of the Public Health (Alcohol) Bill 2015: <https://publichealth.ie/submission-to-the-joint-oireachtas-committee-on-health-and-children-on-the-heads-of-the-public-health-alcohol-bill-2015/>

<sup>6</sup> Reducing alcohol-related harm by addressing alcohol availability – maximising benefits for North South cooperation: [Reducing alcohol-related harm by addressing alcohol availability - maximising benefits for North South cooperation - Institute of Public Health](https://publichealth.ie/reducing-alcohol-related-harm-by-addressing-alcohol-availability-maximising-benefits-for-north-south-cooperation/)

**Reducing Harm, Supporting Recovery**<sup>7</sup> sets out this government's strategy to reducing drug and alcohol use up to 2025 and includes the vision:

*"A healthier and safer Ireland, where public health and safety is protected and the harms caused to individuals, families and communities by substance misuse are reduced and every person affected by substance use is empowered to improve their health and wellbeing and quality of life."*

The **Public Health Alcohol Act 2018**<sup>8</sup> is the main piece of legislation to support a reduction in alcohol use and harms. The Act includes measures to reduce the appeal, accessibility and affordability of alcohol including minimum unit pricing, structural separation of alcohol products in mixed retail outlets, restrictions around alcohol advertising, and on-product health warning labelling of alcohol products. The components of this Act were developed based on evidence and the measures align with the World Health Organization guidance on 'Best Buys'<sup>9</sup> for governments seeking to reduce alcohol harms.

Measures to reduce alcohol harm sit not only with the Department of Health but also with Departments of Justice, Media, Children and Finance. The effectiveness of government strategy and the Public Health Alcohol Act relies on policy coherence across government departments and shared responsibility. A 'health in all policies' approach is particularly important to the regulation of alcohol.

This Bill includes many useful provisions to regularise alcohol licensing in Ireland but it ultimately provides for extended drinking hours in both indoor and outdoor venues. It provides for extended drinking hours in holiday camps, sporting clubs, trains and airports, public venues where children are likely to be present. The World Health Organization has clearly stated that regulating alcohol availability is a cornerstone of effective policy to reduce consumption and harms<sup>9,10,11</sup>. The government's commitment to modernise alcohol licensing and enhance our culture, nightlife and the night-time economy is welcome but we are concerned by international evidence that suggests that measures in this Bill could have some significant unintended consequences, including:

- Increasing the overall availability of alcohol
- Reinforcing alcohol consumption as central to the experience of social, cultural, leisure and sporting activity in Ireland and perpetuating cultural norms around alcohol use
- Increasing consumption<sup>12</sup>
- Increasing certain alcohol-related harms, particularly in nightlife settings<sup>12, 13, 14</sup>
- Increasing demand for emergency services and the health service<sup>12,14,15</sup>.

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<sup>7</sup> Reducing Harm, Supporting Recovery. A health-led response to drug and alcohol use in Ireland 2017-2025 [Reducing Harm, Supporting Recovery A health-led response to drug and alcohol use in Ireland 2017-2025: Department of Health - Reducing Harm, Supporting Recovery - A health-led response to drug and alcohol use in Ireland 2017-2025 - 8715bc0e45494cb2ad9dd42e5b011ebf.pdf \(www.gov.ie\)](https://www.gov.ie/en/publications-and-statements/publication-reducing-harm-supporting-recovery-a-health-led-response-to-drug-and-alcohol-use-in-ireland-2017-2025-8715bc0e45494cb2ad9dd42e5b011ebf.pdf)

<sup>8</sup> The Public Health Alcohol Act 2018, Number 24 of 2018: [Public Health \(Alcohol\) Act 2018 \(irishstatutebook.ie\)](https://www.irishstatutebook.ie/eli/2018/act/24/2018-01-01/en/html)

<sup>9</sup> WHO 'Best buys' and other recommended interventions for the prevention and control of noncommunicable disease: [Best buys short report AW.indd \(who.int\)](https://www.who.int/data/assets/pdf_file/0006/339837/WHO_Policy-in-Action_indh_VII-2.pdf)

<sup>10</sup> WHO SAFER initiative – <https://www.who.int/initiatives/SAFER>.

<sup>11</sup> WHO (2017) Policy in Action – a tool for measuring alcohol policy implementation.

[https://www.euro.who.int/data/assets/pdf\\_file/0006/339837/WHO\\_Policy-in-Action\\_indh\\_VII-2.pdf](https://www.euro.who.int/data/assets/pdf_file/0006/339837/WHO_Policy-in-Action_indh_VII-2.pdf)

<sup>12</sup> Popova et al. 2009. Hours and days of sale and density of alcohol outlets: impacts on alcohol consumption and damage: a systematic review. *Alcohol & Alcoholism*. 44(5):500-16.

<sup>13</sup> Nepal et al. 2020. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review. *Journal of studies on alcohol and drugs*. 81(1):5-23.

<sup>14</sup> Wilkinson et al. 2016. Impacts of changes to trading hours of liquor licences on alcohol-related harm: a systematic review 2005–2015. *Public Health Res Pract*. 26(4):e2641644.

<sup>15</sup> Sanchez-Ramirez et al. 2018. The impact of policies regulating alcohol trading hours and days on specific alcohol-related harms: a systematic review. *Injury prevention*. 24(1):94-100.

## Recommendations

We invite committee members to consider five key recommendations in relation to the Bill:

- (1) Commission a Health Impact Assessment to fully consider the potential health effects from the measures proposed in this Bill prior to its presentation to the Oireachtas
- (2) Establish a public health criterion within the application, determination, and renewal of all forms of licence in Parts 3, 4 and 10
- (3) Ensure that the Health Service Executive is an identified notifying party to all licence and/or permit application, modification, transfer or renewal of licence in Parts 3,4 and 5
- (4) Seek an expert assessment of the likely impact of extended trading hours on drink and drug driving, and an appropriate risk management approach, to support the goals of *Ireland's Road Safety Strategy 2021-2030*<sup>16</sup>
- (5) Review the stigmatising approach to 'Drunken Persons' and require additional measures to enhance the duty of care of licence holders to patrons in the context of prolonged periods of alcohol supply on their premises.

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<sup>16</sup> Our Journey Towards Vision Zero – Ireland's Road Safety Strategy 2021-2030 (Road Safety Authority, 2021): <https://www.rsa.ie/about/safety-strategy-2021-2030>