

5 November 2015

Alcohol Licensing  
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Via email: [alcohollicensing@ccc.govt.nz](mailto:alcohollicensing@ccc.govt.nz)

To the Christchurch District Licensing Committee

### **Wendco (NZ) Limited On-Licence application**

The Royal Australasian College of Surgeons (RACS) wishes to oppose the application made by Wendco (NZ) Limited (Wendco), Danny Lendich, Director, 288 Te Atatu Road, Te Atatu South, Auckland, Private Company to the District Licensing Committee in Christchurch for the issue of an On-Licence in respect of the premises situated at 1 Chappie Place, Hornby, Christchurch, known as Wendy's Hamburgers.

RACS is the leading advocate for surgical standards, professionalism and surgical education in New Zealand and Australia, representing more than 7000 surgeons and 1300 surgical trainees and International Medical Graduates. As part of its commitment to standards and professionalism, RACS strives to take informed and principled positions on issues related to surgical care in New Zealand. The considerable impact of alcohol related harm on public health is one such issue.

Surgeons, alongside other health professionals, are first-hand witnesses to the damage that alcohol-related harm causes on a day to day basis. Whether it be through the extra strain on emergency departments and operating rooms, or the long-term suffering caused by non-communicable disease, the burden that alcohol-related harm places on New Zealand is considerable.

As specified in section 105(1) of the Sale and Supply of Alcohol Act 2012 (the Act), a licensing authority, in deciding whether to issue a licence, must have regard to the object of the Act. This includes the minimisation of the harm caused by the excessive or inappropriate consumption of alcohol. RACS believes that by granting an On-Licence to Wendco, the District Licensing committee will be acting contrary to this object.

There is strong evidence linking the availability of alcohol with an increase in excessive or inappropriate consumption. Many local Councils have recognised this link and have elected to use new powers granted to them by the Sale and Supply of Alcohol Act to limit outlet density via Local Alcohol Policies.

RACS is concerned that by granting an On-Licence to Wendco, not only will the availability of alcohol in the Hornby community be increased, but the sale of alcohol by fast-food restaurants would become normalised. This will set a dangerous precedent and have implications for communities across New Zealand.

RACS strongly advocates for three key areas to reduce alcohol-related harm, summarised by the acronym HOT - for Hours, Outlets and Taxes. This encompasses a restriction on trading hours, reduction of outlet density, and application of a stepped volumetric tax.

In combination, RACS believes that these three key areas effectively reduce alcohol-related harm, and changes behaviour. If the application by Wendco is successful it will only serve to undermine efforts to reduce alcohol-related harm. We urge the Committee to consider the wider ramifications for New Zealand society beyond just this particular circumstance when assessing Wendco's application.

The Christchurch City Council has demonstrated admirable leadership by approving its provisional Local Alcohol Policy in the face of on-going industry opposition. We now request that the District Licensing Committee show similar leadership by rejecting Wendco's application and placing the health of New Zealanders first.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Randall Morton".

Professor Randall Morton FRACS  
Chair, New Zealand National Board