



21 December 2015

The Wellington City Council
PO Box 2199
Wellington 6140

Via: secretarydlc@wcc.govt.nz

To the Wellington City Council

Wellington Local Alcohol Policy

The Royal Australasian College of Surgeons (RACS) strongly urges the Wellington City Council (the Council) to re-visit its Local Alcohol Policy (LAP) and take a stronger stance against alcohol-related harm in Wellington.

RACS is the leading advocate for surgical standards, professionalism and surgical education in New Zealand and Australia, and represents more than 7000 surgeons and 1300 surgical trainees and International Medical Graduates. As part of its commitment to standards and professionalism, the College strives to take informed and principled positions on issues associated with the delivery of health services. The harm caused to our communities by the overuse of alcohol is one such issue.

Despite new powers being introduced with the Sale and Supply of Alcohol Act 2012 to address the issue, alcohol-related harm still remains a considerable problem for New Zealand. A recent survey by the Australasian College of Emergency Medicine found that 1 in 12 admissions to emergency department in New Zealand involve the consumption of alcohol. In the period between Friday night and Sunday morning, this ratio increases to 1 in 8. Alcohol-related harm is consuming a significant proportion of our country's medical resources.

Surgeons frequently treat injuries caused by alcohol fuelled violence and are faced daily with the harm associated with the prolific supply, promotion and abuse of alcohol. Alcohol consumption is also linked to many long term non-communicable diseases, such as cancers.

Following the earlier unsuccessful attempt to develop a LAP for Wellington, there has been almost no further communication from the Council on this matter. The relevant LAP page on the Council's website has not been updated since late 2013, and there has been very little information published elsewhere on how the Council plans to reduce alcohol-related harm in the future.

RACS advocates for three key areas where alcohol-related harm can most effectively be reduced, summarised by the acronym HOT for Hours, Outlets and Taxes. This encompasses a restriction on trading hours, reducing outlet density, and applying a stepped volumetric tax. By developing a LAP based on these actions, the Council has an opportunity to show leadership in the struggle against alcohol-related harm not just in Wellington, but in New Zealand.

RACS therefore recommends that the Council restrict the trading hours of off-licences to 10pm at the latest, and on-licences to no later than 3am, and introduce a one-way door policy from 1:30am to help diffuse crowds at the end of the night. There is strong evidence to show that such measures correlate with a positive impact on alcohol-related harm; earlier closing hours lead to a reduction in alcohol presentations in emergency departments, and one-way door policies have dramatically curbed alcohol-fuelled violence in Sydney and Newcastle, cities which once struggled with early morning assaults.

Since their introduction, LAPs have been subjected to appeal. However, for many councils across the country, the Alcohol Regulatory and Licencing Authority has been ruling in favour of LAPs that seek to reduce alcohol-related harm. We would encourage the Wellington City Council to commit to reducing alcohol-related harm, by introducing an appropriate LAP.

Should you require any further comment or assistance please do not hesitate to contact me.

Yours sincerely

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

Professor Randall P Morton FRACS
Chair, New Zealand National Board