

Mr Dini Soulios
Commissioner of Consumer and Business Services
Consumer and Business Services
Level 4/95 Grenfell St,
ADELAIDE SA 5000

Dear Mr Soulios

RE: LIQUOR LICENCING ACT 1997 – REVIEW OF THE LATE NIGHT TRADING CODE OF PRACTICE

Thank you for the opportunity to provide a submission to the Consumer Business Services Review of the Late Night Trading Code of Practice (the 'Code').

SA Health has a particular interest in the Objects of the Liquor Licensing Act 1977 3(a) and 3(b):

- to ensure that the sale and supply of liquor occurs in a manner that minimises the harm and potential for harm caused by the excessive or inappropriate consumption of liquor
- to ensure that the sale, supply and consumption of liquor is undertaken safely and responsibly, consistent with the principle of responsible service and consumption of liquor

The Act is an important regulatory framework to assist the South Australian government to reduce the harms associated with alcohol use.

The World Health Organisation recognises that harmful drinking is among the foremost causes of disease, injury and violence. Alcohol intoxication is associated with high-risk behaviours, including the use of other psychoactive substances and unsafe sex.

Alcohol use is a significant public health issue in South Australia:

- 1 in 5 South Australians have been a victim of an alcohol related incident.
- 68% of substance-related hospital stays are attributable to alcohol
- 1 in 4 emergency department presentations for injuries are estimated to be attributable to alcohol.

The available research suggests that the Code, as an overall measure, has been successful in reducing alcohol-related harm in and around licenced venues. Alcohol-related presentations to the Royal Adelaide Hospital have reduced from 544 in 2015 to 258 as at 30 November 2022.

We understand that the '3am lockout laws' included in the Code are of particular public interest. While a decline in alcohol-related incidents within the CBD and alcohol-related hospital admissions following the introduction of the Code was identified, it is not possible to determine with any certainty, the extent to which the lockout component alone has contributed to this decline.

Similar laws introduced between 2008 and 2014 in both Melbourne and Sydney have been repealed citing inconclusive evidence, and replaced with 'Last Drinks' policies, that prohibit the

sale of alcohol after a certain time (between 1-3am). The public health impact of these specific policies is still unknown; however, preliminary international data suggests that reducing hours of sale of alcohol is likely to reduce alcohol-related harms.

The Code, in its current iteration, excludes the Adelaide Casino (and other exempt venues) from lockout provisions. This may limit the effectiveness of this aspect of the Code, as patrons are diverted from other venues to the Casino for example. We recommend that the Adelaide Casino and other exempt venues are included in all elements of the Code, including 3am lockout provisions, should they continue.

I have enclosed the data you have requested which outlines statistical information for the period 1 January 2015 until 31 November 2022 in relation to Emergency Department alcohol related presentations at the:

- Royal Adelaide Hospital
- Lyell McEwin Hospital (for comparison data)
- Flinders Medical Centre (for comparison data)

The information is provided for the period of 12:00am to 7:00am and broken down to time of day by hourly blocks.

Yours sincerely



DR ROBYN LAWRENCE
Chief Executive

29 / 12 / 22

Encl. Emergency department presentations for alcohol diagnosis