



ABN: 47595331649

GPO Box 3628, Darwin, NT 0801 155 Stuart Hwy, Parap, T: 08 89446565 F: 08 8981 8456 E: habitwise@amity.org.au

11 March 2020

Committee Secretary
GPO Box 3721 DARWIN NT 0801
Email: LSC@nt.gov.au

RE: Liquor Amendment Bill 2020

Amity takes this opening to thank you for the opportunity to provide comment on this important Amendment. We acknowledge that enabling the Bill to progress through the Scrutiny Committee allows for public and interested (vested or other) parties to make comment.

In 2017 Amity made a submission to the 'Riley Review'. In that submission we recommended that the purpose of alcohol policy should be to reduce harms for people, families and communities from alcohol. While to a lesser extent acknowledging business, tourism, economic and recreational drivers of alcohol. And submissions and information from industry be carefully scrutinised against empirical evidence and not be used as a driver of policy formation.

Amity Community Services Inc. has been working in the field of harm minimisation for over four decades. We hold expert knowledge, skills and understanding of alcohol and harm. We bring to the discussion a local, evidence-informed view that is underpinned by decades of practice experience and a deep understanding of public health and alcohol as '*no ordinary commodity*'.

Amity opposes the introduction of the Liquor Amendment Bill 2020. From our perspective this Bill is seeking to undo and undermine significant, world-leading harm reduction measures introduced into the Liquor Act in 2019 to address the harm our people, communities and the Territory is feeling because of our relationship with alcohol.

This Bill, in our view, will intended or unintended, make it easier for any and all current or future take-away liquor licence holders to substitute small premises for larger outlets. For example, the substitution of a licence (non-trading) at a small corner premises in Suart Park to a warehouse style liquor barn on the Airport development site, or a bar in Mitchell Street to a significantly larger venue in the midst of a new family suburb with a focus on the right social infrastructure to enable communities to thrive.

The evidence is clear, albeit complex, that when there is an increase in availability and accessibility there is an increase in use and with that increase in use there will be an increase in harms.

Amity calls on all committee members to look to the future of our people and community and their long-term health and wellbeing, social connection and cohesiveness and to hold families at the heart when they consider this Bill in its current form.

Amity is a small organisation with finite resources and a focus on prevention and treatment and thus the decision to use our resources to oppose licences, amendments and such comes with great consideration. With this in mind we again highlight the ongoing requirement of the onus being placed on those with the least resources to demonstrate the harm people, families and community will experience instead of the onus being on the licensee to fulfil this requirement by-way of an at arms-length and with a robust and transparent methodology an authentic community impact analysis of the benefit and costs of alcohol businesses being in our community.

Therefore, in principle, Amity support the recommendation made in submissions by Foundation for Alcohol Research & Education (FARE), Danila Dilba, NTCOSS, People's Alcohol Action Coalition and the Australian Drug Foundation (ADF), organisations that have solidly presented evidence and rational argument for why this Bill should not pass through in this form at this time.

In conclusion, Amity opposes this legislative reform and the removal of the 'like-for-like' substitution because of the ongoing harmful health, social and economic consequences the Territory experiences now and into our future.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nicola Coalter', with a large, stylized initial 'N'.

Nicola Coalter
CEO