

Submission to the Alcohol Advisory Group

January 2008

Barnardos welcomes the opportunity to make a submission to the Alcohol Advisory Group and believes that a review of legislation in this area is necessary. While the remit of this group is to examine possible legislative reform, Barnardos' recommendations cover additional areas that are outside the scope of this Group but would have a positive impact on tackling alcohol misuse and binge drinking and it is hoped these proposals can be fed into the relevant Departments.

Through our work with families and children we experience first hand the impact alcohol abuse can have within the family and the wider community. Unfortunately, as alcohol is so widely available and culturally acceptable in Irish society it is perceived to be less harmful than illegal substances with the result that the affects of its misuse can be underestimated. Alcohol is now frequently seen as a 'gateway drug' to cocaine, cannabis and ecstasy.

However, the scale of alcohol consumption and misuse is staggering. Alcohol consumption (per head of population) showed an increase of 48% over the twenty year period 1986-2006. The increase in beer consumption was 10%, spirits 21%, wine 418% and cider 521%¹. Alcohol related deaths doubled in the same period. Such increases in alcohol consumption has led to increased suicide, mental illness, visits to A & E, road accidents, domestic violence and an increase in risky sexual behaviour.

The increased availability of alcohol through off-licences has also compounded this situation. Between 2000 and 2007 the number of off-licences has grown from around 600 to over 1,800, including those attached to pubs, according to the National Off-Licence Association. Even the number of licensed premises has increased from 7,466 in 2000 to 9,555 in 2006 – this equates to one alcohol licence for every 163 adults.

Barnardos conducted a national Childhood 2007 Poll and the issue of alcohol was identified as a key concern for parents. Eight out of ten children and young people surveyed had discussions with their parents on alcohol but only six out of ten children and young people could identify a family rule being in place around alcohol. One third of parents of teenagers surveyed were aware that their child was drinking alcohol and while this in itself is not a new phenomenon the greater availability and the role of alcohol in fights and violence on the streets and in risky sexual behaviour were major concerns.

Alcohol consumption among children and young people

Certainly the extent of teenage drinking and binge drinking is worrying. The impact of alcohol misuse on young people's bodies and behaviour can be particularly striking as children and young people are still developing both physically and psychologically.

¹ Department of Health and Children (2007) Alcohol Consumption 1996-2006, Dublin

- 32% of Irish 15-16-year-olds surveyed reported engaging in binge drinking at least three times in the month prior to the survey being conducted, the highest in the EU for that age cohort².
- Alcohol-related offences for Irish 15-17-year-olds increased by 135% between 2000 and 2005³.
- 60% of binge drinkers admitted involvement in criminal and/or disorderly behaviour during or after drinking, compared with 25% of regular drinkers. Young males were most likely to report such behaviour (69%)⁴.
- Young people who commence drinking at 15 years old are four times more likely to have alcohol related problems in adulthood⁵.
- Binge drinking can directly cause depression, anxiety, suicide and attempted suicide. 93% of men under 30 who committed suicide had alcohol in their blood stream⁶.

Effects of parental drinking on children

Another aspect to consider is the effects of parental drinking on children. All family circumstances are different and the impact of parental drinking on children is always family specific and depends on the frequency and severity of the abuse. However, the scars of growing up in a household exposed to alcohol addiction can last a lifetime. Common familial consequences of alcohol misuse which can impact negatively on a child's physical, emotional and educational development include:

- Risk of Foetal Alcohol Spectrum Disorder arising from women drinking alcohol while pregnant.
- Inconsistency in parenting standards when routines become irregular.
- Parents becoming emotionally and physically detached from their children and as a result have a poorer awareness of their children's needs.
- Children have to assume parenting responsibility prematurely as parents unable to conduct domestic and childcare duties effectively.
- Children feeling confused, rejected, burdened and unable to trust parents.
- Children being exposed to or at risk of domestic violence.
- Family may experience material deprivation such as lack of food or clothing.
- Parents have reduced sensitivity to risk of danger and may leave children unsupervised.

Recommendations

Pricing

- abolition of below cost selling alcohol in supermarkets and off-licences
- increase excise duty on alcohol drinks

Legislation aimed at regulating the selling of alcohol in licensed premises, supermarkets, petrol stations and off-licences is necessary to ensure that non alcoholic drinks are cheaper than alcoholic drinks. Also the use of promotional tactics

² Health Research Board (2007) Health related problems of alcohol use, Dublin

³ Ibid

⁴ Institute of Alcohol Studies (2007) Alcohol and Crime, UK

⁵ Department of Health and Children (2007) Irish health behaviour in school age children, Dublin

⁶ Irish Medical Journal (2006) Blood Alcohol Levels in Persons who Died from Accidents and Suicide, March 2006, Volume 99, Number 3.

such as 'buy 2 bottles, get the 3rd one free' and 'up to 50% off' should be outlawed as it only fuels and encourages binge drinking.

Linked to this is the recommendation of the Strategic Taskforce on Alcohol (2004) to increase excise duty on alcohol with a view to reducing overall consumption. Funding generated under this should be earmarked for the promotion and support of community based initiatives aimed at reducing underage drinking by providing alcohol free venues and activities, for example teenage cafes, sports facilities etc.

Licensing

- excise duty for off-licensed premises
- discrepancy for granting wine licence
- overview of theatre licences

Off licence holders pay a flat rate excise duty per licence type held per year. Although they usually hold 3 licences to make up a full licence to cover sale of spirits, beer and wine. This is a flat rate regardless of their turnover, whereas on licence holders are subjected to a sliding scale whereby the amount paid in excise duty is higher if there is a greater turnover. Barnardos believes the legislation should be amended to ensure that off license holders rate of excise duty reflects their sales.

At present, unlike other alcohol licences, no Court certificate is required when requesting a wine licence. This means that it is not possible to object to the issue of a wine licence and subsequently its availability is widespread, particularly in the majority of grocery stores and petrol stations. Barnardos calls for the same processes to apply to the granting of wine licences, primarily the requirement to obtain a Court certificate.

At present theatres are not subject to alcohol laws governing licensed premises including the serving of intoxicated persons. These licences are issued on foot of acquiring a public music and singing licence. This discrepancy means there are fewer requirements to satisfy when serving alcohol. Barnardos recommends that theatre licences should be subject to the same liquor licensing procedures as other venues.

Availability

- enforcement of minimum age
- opening of off-licences and availability of alcohol in garages

Barnardos believes that the minimum age of 18 years be more stringently enforced especially in off-licences and supermarkets. This could be done in conjunction with employees of the trade and the Gardai. A national ID card system has been mooted but never rolled out. Such a system as operates successfully in Scotland could be feasible as their system works in conjunction with youth organisations and enables the card holder to avail of discounts in shops and other amenities targeted at young people and is viewed positively.

The availability of alcohol in a variety of locations has significantly increased recently, therefore, Barnardos calls for more regulation in the granting of new licences. Such widespread availability can lead to greater incidences of drinking in public places and subsequent anti-social behaviour. It is essential that Local Authorities take cognisance of their own area development plans as well as the potential social impact of another off-licence when granting new permits. Likewise, in the interest of road safety, the sale of alcohol in garages should be restricted.

Marketing

- alcohol advertising watershed of 9pm
- introduction of warning labels

Advertising does work and international research evidence indicates that young people respond to alcohol marketing on an emotional level, changing their beliefs and expectations about drinking. At present, only a voluntary code of advertising applies to the drink and advertising industries. Barnardos calls for the introduction of legislation to reduce the exposure of children to alcohol advertising and sponsorship. This would include a watershed of 9pm before any alcohol related advertising could appear on TV, radio or cinema. This recommendation is supported by parents when 70% of them want alcohol advertising to be banned before the 9pm watershed⁷.

At present the EU adopts a self regulatory approach and it is up to each member to decide if warning labels are to be mandatory, such legislation is in practice in France. Barnardos believes that Ireland should also introduce legislation to ensure warning labels are placed on all alcoholic drinks. This may act as a deterrent especially to pregnant women. A survey of more than 43,000 women attending ante-natal classes at the Coombe Hospital, Dublin between 1999 -2005 found that almost 10% were consuming six or more alcoholic drinks a week⁸. This can lead to Foetal Alcohol Spectrum Disorder that can lead to physiological differences, concentration problems and heart defects.

⁷ Barnardos (2007) Childhood Poll

⁸ Irish Examiner, 15th January 2007