

26th July 2017

SUBMISSION BY CANCER COUNCIL NSW TO:

**LIQUOR AND GAMING NSW EVALUATION OF THE COMMUNITY IMPACT
STATEMENT REQUIREMENT FOR LIQUOR LICENSE APPLICATIONS
DISCUSSION PAPER**

By email: cis.evaluation@justice.nsw.gov.au

Thank you for the opportunity to provide comment on the Liquor & Gaming NSW *Evaluation of the Community Impact Statement requirement for liquor licence applications Discussion Paper*.

Cancer Council NSW (CCNSW) focuses on cancer research, prevention programs, advocacy, and providing information and support for people affected by cancer. The mission of CCNSW is to defeat cancer by engaging the community. CCNSW has a series of evidence-based recommendations aimed at preventing cancer at the population level, and one of these includes limiting alcohol consumption to reduce alcohol related cancers.

An estimated 3,208 cancers (2.8% of all cancers) occurring in Australian adults in 2010 could be attributed to alcohol consumption.¹ Alcohol is proven to increase the risk of 7 different types of cancer including mouth, throat, oesophagus, stomach, bowel, liver and breast. CCNSW supports evidence based action to reduce the burden of morbidity and mortality caused by alcohol use.

The purpose of the Community Impact Statement (CIS) is to help the Independent Liquor and Gaming Authority (ILGA) understand the impact a licence will have on the local community. Any evaluation of the CIS for liquor license applications must consider how to actively support communities to create environments that assist the population drink alcohol at lower levels to reduce the long-term risk of cancer.

CCNSW is a member of the NSW/ACT Alcohol Policy Alliance (NAAPA) which is a coalition of 48 organisations working to reduce alcohol-related harms by ensuring that evidence-based solutions inform alcohol policy discussions in NSW and the ACT.

CCNSW supports all of the recommendations made in the NAAPA submission to the Liquor & Gaming NSW Evaluation of the Community Impact Statement requirement for liquor licence applications Discussion Paper. These are:

1. That the NSW Government make liquor licencing processes more transparent and improve public awareness, engagement and community input to these processes.

2. That the NSW Government make the CIS a requirement for all licence applications and notify at a minimum the local consent authority, local police and all occupants of neighbouring premises within the primary trade area.
3. That the NSW Government make the CIS and all supporting documentation, including the social impact assessment, publicly available in real time on the Liquor and Gaming Application Noticeboard. Any submissions made in favour or opposition of a licence application should also be published.
4. That the NSW Government establish an independent Community Defender's Office (CDO) to support communities in licensing matters. The CDO should consist of an advisory service and central information service, with staff that have appropriate skills and expertise in alcohol related planning and licensing systems, including legal skills and an understanding of community needs and expectations.
5. That the NSW Government ensure that the onus of proof is on applicants, not community objectors.
6. That the NSW Government properly resource ILGA to monitor compliance and independently assess every application.
7. That the NSW Government keep community consultations at the Development Application (DA) process and the liquor licence CIS process separate. Local Council should also be resourced and supported to adequately assess a DA.

In addition, CCNSW recommends that consultation and notification processes can be improved by **the local community being informed about all new liquor licence applications and variations to existing liquor licences through notification in the local newspaper and electronically**. The World Health Organization recommends that the public is informed about new liquor licences both on-site and in the public notices section of local newspapers,² which is not currently required in NSW.

A comprehensive approach to alcohol policy is required to reduce the burden of both short- and long-term harms caused by alcohol consumption, including the risk of cancer. Evaluation of the CIS requirement for liquor licence applications provides an opportunity to develop a transparent and resourced system that enables communities to make informed choices about liquor license applications.

For further information about this submission, please contact:

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(1) Pandeya N, Wilson LF, Webb PM, Neale RE, Bain CJ, Whiteman DC. Cancers in Australia in 2010 attributable to the consumption of alcohol. Australian and New Zealand Journal of Public Health 2015 Oct 1; 39(5):408-13.

(2) World Health Organization Western Pacific Region. Addressing the harmful use of alcohol: a guide to developing effective alcohol legislation. Geneva: World Health Organization; 2011.