CENTRAL AUSTRALIAN ABORIGINAL CONGRESS
ABORIGINAL CORPORATION ICN 7823

Russell Goldflam
Chairperson
Northern Territory Liquor Commission
GPO Box 3946
DARWIN NT 0801

By email: liquor.commission@nt.gov.au

RE: LIQUOR COMMISSION PROPOSAL LC:OMV:2025-001

Dear Mr Goldflam,

Thank you for providing Central Australian Aboriginal Congress with the opportunity to respond to the Northern Territory Liquor Commission's notice of proposed variations of licence conditions in Alice Springs (LC:OMV:2025-001).

As you know, Congress has been a strong advocate for the regulation of alcohol supply as a key, evidence-based method for reducing the high levels of harm that alcohol causes in Alice Springs. These harms are disproportionately felt by Aboriginal people, and especially by women and children.

We strongly support the regulations brought in by the Northern Territory Government in February 2023, including the two takeaway free days (Monday and Tuesday) and limitations on the time of day that takeaway alcohol may be sold (not before 3pm on Wednesdays, Thursdays and Fridays). These regulations have led to substantial reductions in alcohol supply, and thus to harms such as alcohol-related domestic violence assaults and alcohol-related Emergency Department presentations at Alice Springs Hospital. These reductions are summarised in our attached report based on the latest publicly available data

Nevertheless, more needs to be done to reinforce and, where necessary extend, the regulations. This remains true even as per capita consumption in the Central Australian region has been successfully reduced over the last twenty-five years to the point where it is now lower than the national average[1]. Despite this success, harms, although reduced remain higher than the national average because of the particular historical and social context in which drinking occurs in Central Australia. For Aboriginal people, the experience of colonisation and intergenerational trauma, poverty, inequality, poor education, and discrimination are at the root of alcohol use, and unfortunately the antisocial behaviour and violence that often results. Until these root causes are addressed, we cannot be complacent. Sensible, evidence-based regulation of alcohol supply and the conditions under which it can be sold will continue to be needed.

[1] Clifford S, Wright CJC, Chikritzhs T, Livingston M. Regional Variation in Alcohol Consumption in the Northern Territory: An Update. Drug Alcohol Rev. 2026 Jan;45(1):e70055. doi: 10.1111/dar.70055. Epub 2025 Oct 27. PMID: 41146432.

For these reasons, we are grateful for the attention the Commission is giving to the harms arising from the selling of alcohol in on-licence premises in the period before takeaway alcohol purchases become available at 3pm on Wednesdays, Thursdays and Fridays.

Our response to each of the three proposals is as follows.

Proposal 1: Full-strength alcohol only with a full meal

We **support** the proposal to ensure that a range of licensees in Alice Springs are only permitted to sell full-strength alcohol with a full meal from 11:30am to 3:00pm on Wednesdays, Thursdays and Fridays. It is well established that food reduces the absorption of any alcohol consumed so this will help to reduce excessive blood alcohol levels.

Proposal 2: On-premises identification system

We **support** the proposal to introduce an on-premises identification system to screen people entering a number of licensed premises in the CBD before 3:00pm on Wednesdays, Thursdays and Fridays.

However we recommend that the effects of this proposal are carefully monitored in 'real time' by the Commission, with an in-depth six month review following its implementation and, if necessary, the extension of the requirement for on-premises ID to **all** on-licence venues in Alice Springs.

1. **Extension of on-premises ID to all licensed premises**

   One of the key gaps in the Banned Drinkers Register (BDR) provisions is that those on the BDR continue to drink alcohol at on-license venues. We argue[2] that, in line with Section 7 of the *Alcohol Harm Reduction Act 2017* which says that someone with a Banned Drinkers Order (BDO) "is prohibited from purchasing, possessing or consuming alcohol during the period for which the order is in force", licensed pubs and clubs should be required to scan patrons' identification on entry to confirm that they are not on the BDR. Those who are on the BDR or otherwise prohibited from buying or consuming alcohol should be refused access to the premises. The supply of alcohol at a licensed pub or club to such a person should be an offence.

   We note that the Commission's proposal is precisely to address this gap, **however** it only applies to a small number of licensed premises in the CBD, and not all licensed premises in the town.

   While we think this is likely to be effective in reducing intoxicated people in the CBD, we are concerned that given the nature of alcohol addiction, the proposal will shift some of the issue of on-license drinking prior to takeaway alcohol becoming available at 3pm to premises outside the CBD. This comes with the potential for increased harms arising when intoxicated people attempt to walk or drive from these premises to the takeaway outlets in CBD. We are particularly concerned about the potential for intoxicated people to attempt to travel from the Gap View Hotel up the busy Gap Road to the CBD.

[2] Submission regarding the Draft Northern Territory Alcohol Action Plan March 2023

2. **The need for monitoring**

In our view, this points to the need for ongoing monitoring of the effect of the implementation of on-premises identification system for the proposed licenses in the CBD. It is important that this happens in as close to 'real time' as possible, using the publicly available data on consumption, crime and hospital presentations, noting that formal academic evaluations, while essential, are rarely completed in a timeframe that allows for an effective, real time response to emerging patterns of harm.

We also note that should this expected shift to drinking at licensed premises outside the CBD occur, this **should not** be taken as evidence of a failure of the use of on-licence ID systems to prevent banned drinkers from purchasing or consuming alcohol. In fact, if such a shift occurs, it demonstrates that the use of such systems **is** effective in changing drinking behaviour, and therefore that it should be extended to all on-licence premises in Alice Springs.

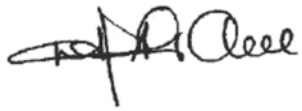
We recommend that the Commission holds a further investigation into the harms associated with on-licence drinking prior to the opening of takeaway outlets six months after the implementation of this proposal.

Proposal 3: Practices relating to disturbances at Lasseters Hotel Casino

We **support** the proposal as we believe that the responsible service of alcohol will greatly improve once it is clear that licensees have responsibility for the actions of intoxicated patrons in the period after they leave their premises.

Thank you for your consideration of these important issues. I would be very happy to discuss them should you wish. In the meantime, please contact Congress' Public Health Medical Officer, Dr John Boffa on 0418 812 141 or john.boffa@caac.org.au if you would like more detail on the matters raised here.

Yours sincerely



Donna Ah Chee
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