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Helen McEntee, TD, Minister for Justice
51 St Stephen's Green
Dublin 2, D02 HK52
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4 January 2024

Re: Sale of Alcohol Bill - increasing alcohol availability will increase alcohol harm

Dear Minister,

We have a healthcare system that is creaking at the seams and at the same time we have increasing numbers of people concerned about their own, their family's / community's health and mental well-being.

In addition, there are growing public health implications from alcohol consumption which is responsible for a considerable [burden](#) of ill health, social and economic harm at individual, family and societal levels.

It is against this background that two groups, under the umbrella of Alcohol Action Ireland, with different lived experiences of alcohol harm, have joined forces on the Sale of Alcohol Bill to ensure our collective voices are heard before your Bill is brought forward to the next stage.

1. [Silent Voices](#), (echoing the experiences of over one million people who have grown up with or are now living with alcohol harm in the home)
2. [Voices of Recovery](#), (echoing the thoughts and fears of nearly 600,000 people who have an alcohol use disorder including many in long-term recovery from alcohol dependency)

Even though it is well known and [evidenced](#) that increasing alcohol availability will increase alcohol harm, this Bill allows for:

Alcohol Action Ireland Directors Prof Frank Murray. (Chair), Catherine Brogan, Pat Cahill, Paddy Creedon, Michael Foy, Dr Jo-Hanna Ivers, Dr Mary O'Mahony, Dr Colin O'Driscoll, Dr Bobby Smyth, Anita Whyte

Patron Prof. Geoffrey Shannon

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- The general extension of licensing hours of all bars/restaurants from 11.30pm to 12.30am
- The facilitating of late-night opening of bars to 2.30am
- The extension of nightclub hours to 6am
- The introduction of cultural amenity licenses to venues not usually having a license
- The revoking of the requirement to extinguish a license before opening new premises. This will increase the number and density of alcohol outlets.

All of these measures will increase alcohol availability. There is extensive international evidence that demonstrates clearly that such increases lead to increased alcohol consumption. This in turn leads to: Increased alcohol related injuries, illness and crime; increased burden on public services such as ambulance services, Emergency Departments and Gardáí. Furthermore, it does not solve the problem of crowds spilling onto the streets at closing time; it merely shifts the problem into later in the night/early morning.

For this reason, the World Health Organisation strongly [recommends](#) decreasing licensing hours and the density of alcohol venues in order to reduce alcohol use and its consequent harms.

Currently in Ireland the [indices of alcohol harm](#) include:

- 4 people die every day from alcohol - nearly 1500 annually
- 1,500 hospital beds are in use every day because of alcohol
- At weekends 30% of Emergency Department presentations are alcohol related
- Alcohol is a factor in half of all suicides
- Alcohol is a factor in at least 44% of domestic violence incidents
- Alcohol is a factor in almost half of adult sexual assault cases
- Alcohol related crime costs Ireland at least €686 million annually
- 39% of driver fatalities had a positive toxicology for alcohol

The issue of road deaths is particularly relevant to consideration of this Bill. At the very least the proposals will change the timing that intoxicated drivers are likely to be on the road and may also increase the level of 'morning after' intoxication given the shortened time between closure and the next day. However, despite road deaths significantly increasing in 2023, the number of alcohol breath tests carried out at Garda checkpoints has [dropped](#) by more than half compared with pre-pandemic levels.

We cannot risk the lives and well-being of our citizens and therefore we ask you to immediately carry out a Health Impact Assessment (HIA) of the Bill. A HIA is a practical approach used to judge the potential health effects of a proposed policy, programme or project on a population, particularly on vulnerable or disadvantaged groups.

Additionally, this bill presents an opportunity to make statutory provision for the systematic collation of relevant data around alcohol and its harms. Once we measure it, we can reduce alcohol harm.

We know the life-long harm that will result from increased alcohol consumption and our concerns are also shared by 67% of the public as indicated in recent [polling](#). We urge you to prioritise the health, wellbeing and safety of families and communities over narrow industry interests.

Yours sincerely,

Marion Rackard, Silent Voices

Paddy Creedon, Voices of Recovery

Dr Sheila Gilheany, CEO Alcohol Action Ireland

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