Mr Peter Minchin  
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Department of Local Government, Sport and Cultural Industries  
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Dear Mr Minchin

Submission to the Inquiry into availability of packaged liquor in Karratha

Thank you for the invitation to provide a submission to the Inquiry to determine whether restrictions on the availability of packaged liquor in Karratha and the surrounding areas are in the public interest. This letter sets out my views on the extent and impact of alcohol-related harm in Karratha and its surrounding communities. I was unable to obtain evidence directly from children and young people in the available timeframe; however I would be happy to facilitate this process early in the new year if the additional information would be valuable to your inquiry. I believe that the views of children and young people should be given serious consideration in any decision-making process on matters affecting them.

As Commissioner for Children and Young People in Western Australia, I have a statutory responsibility to monitor and review laws, policies, practices and services that affect the wellbeing of children and young people under the age of 18 in WA, and in doing so, have regard to the best interests of the children and young people as being of paramount importance. I work under the principles that children and young people are entitled to live in a caring and nurturing environment and to be protected from harm and exploitation.¹

The call for restrictions on the sale of packaged liquor in Karratha, and the Pilbara more broadly, is based on evidence that the existing levels of alcohol related harm in Karratha and the Pilbara significantly exceeds the State averages and that imposing restrictions on the availability of packaged liquor is an effective means of reducing alcohol-related harm. The association between alcohol consumption, child abuse and

¹ Commissioner for Children and Young People Act 2006 (WA) Section 3 and 4 p2.
neglect and family violence is well documented\(^2\). Evidence from the Port Hedland and South Hedland Inquiry has shown that this problem is a community-wide issue and not simply a problem affecting Aboriginal people, those on welfare payments or isolated groups within the community.\(^3\) The impact of high alcohol consumption on children and young people is consistent regardless of the town the activity occurs in and a broad geographically based restriction is consistent with the aim of protecting vulnerable children and young people by introducing a circuit break, through alcohol restrictions, into the dysfunctional cycles of anti-social and criminal behaviour in these communities.

The impact of alcohol-related harm

The harm associated with alcohol abuse affects children and young people in many aspects of their life. Fetal Alcohol Spectrum Disorder (FASD) is often prevalent, as is poor nutrition, poor school attendance and completion rates, and physical violence. The link between alcohol consumption and child protection issues has been well documented, alongside the frequently associated impact of family and domestic violence on children and young people\(^4\). These outcomes of alcohol abuse are not unique to the Port and South Hedland area and are, on the basis of the evidence by WA Police, similarly reported in Karratha and its surrounding areas. This demonstrates the need for a broader, district based approach which implements consistent restrictions across the Pilbara area in order to be effective.

Psychological trauma and mental health impacts, school difficulties, likelihood of substance abuse, early school-leaving, self-harm and suicide attempts and higher potential for violent behaviours themselves have all been reported in similar communities where alcohol consumption is prevalent.\(^5\) The child does not have to be the victim of violence themselves – the existence of violent behaviour in the household has been shown to cause trauma and yet, according to the United Nations Convention on the Rights of the Child ‘all children and young people have a right to live free from violence in any form’\(^6\). Without addressing these issues, the chance of a broader cultural change in the approach to alcohol consumption is slim.

The harmful use of alcohol is also a serious health burden not only in Karratha and its surrounding areas but more broadly across the Pilbara, the Kimberley and other areas of WA. The concept of harmful use of alcohol is broad and encompasses drinking that causes detrimental health and social consequences not only to the person drinking but


\(^4\) Laslett AM, Mugavin J, Jiang H, Manton E, Callinan S, MacLean S, & Room R 2015. The hidden harm: Alcohol’s impact on children and families.

\(^5\) Richards K 2011, Children’s exposure to domestic violence in Australia, Trends and issues in crime and criminal justice, No 419. Australian Institute of Criminology, p.3.

to their family and community.\textsuperscript{7,8} As noted above, it is of serious concern that children and young people are at risk of modelling behaviour seen in their families and communities. Where children and young people are exposed to excess alcohol use and resulting violence they are at risk of mirroring and continuing these behaviours\textsuperscript{9}. This cycle needs to end and broad and consistent restrictions across the affected region(s) are an essential step in addressing these issues.

\textbf{The case by Police for restrictions}

The package of evidence submitted by the WA Police’s Licensing Enforcement Division (hereafter referred to as the Commissioner of Police’s letter) outlines a range of significant harms occurring due to excessive alcohol consumption; many of them affecting children and young people, particularly family and domestic violence and exposure to neglect and trauma. Included within this evidence is a range of data showing that alcohol-related disorders, violence and harm in Karratha and Roebourne, predominantly supplied packaged liquor from Wickham, are significantly higher compared to metro and country rates as well as state-wide rates.

Police data shows that the situation has become significantly worse in recent times and clearly illustrates a town and a district in crisis. Offences and police tasking have significantly increased, especially in the last one to two years, and it is understandable that the police have developed a case for a broader application of alcohol restrictions across the Pilbara district in order to address this crisis.

The Commissioner of Police’s letter encloses a letter from Superintendent Paul Coombes from the WA Police Pilbara District Office, this letter contains a section regarding information obtained from the Department of Child Protection and Family Services, who have identified that excessive alcohol consumption is a major contributing factor in the majority of cases where children come into the care of the state in the Pilbara. CPFS have also supported the statement that alcohol is a key factor in domestic and family violence reporting in the area. It is apparent that restricting alcohol availability is an important strategy in harm reduction, particularly where it would allow CPFS to conduct their business of focusing on the safety and welfare of the child in a more secure environment.

The letter also notes that safety of children and young people is a significant issue in Karratha; that children and young people are exposed to child neglect, engage in juvenile crime, develop learned behaviour from heavily intoxicated parents, have lowered school attendance, suffer early life trauma and suffer from Fetal Alcohol Spectrum Disorder (FASD).

Superintendent Paul Coombes’ letter, also reports a large cohort of young people who have poor school attendance or no engagement with the Department of Education in Roebourne; largely attributed to the knock-on effects of high alcohol consumption in

\textsuperscript{7} World Health Organisation, 2010, Global Strategy to reduce the harmful use of alcohol p5-6.
\textsuperscript{8} Laslett M at al 2015. The hidden harm: Alcohol’s impact on children and families.
\textsuperscript{9} Ibid.
the area due to the supply of packaged alcohol from Wickham. The letter also refers to vulnerable and at risk children feeling unsafe at home and walking the streets at night when adults are drunk in the home. Clearly intervention is required in order to ensure the safe and healthy development of the vulnerable children and young people affected by this conduct.

I support the application by local police to restrict the sale of packaged liquor in Karratha and its surrounding areas, in addition to my support of the application for restrictions in Port Hedland and South Hedland provided by submission dated April 2017. Such restrictions in other areas have demonstrated positive outcomes in significantly reducing alcohol related harm, particularly where the local community has supported their introduction, as in the case of the Elders in Roebourne. I also support the imposition of restrictions over a broader area, the Pilbara district, to properly restrict access to packaged alcohol by persons in nearby towns.

**Children and young people’s views on the impact of excessive alcohol consumption**

My office has spoken to children and young people on the issue of the impact of alcohol-related harm in their communities in Fitzroy Crossing, Halls Creek and Kununurra as well as in Port and South Hedland. Key areas of impact highlighted in these consultations include community safety, health and education.

According to the Australian Bureau of Statistics, just under 12,000 children and young people under the age of 18 live in the Pilbara,\(^{10}\) with almost 40% of these living in Karratha (around 4,700).\(^{11}\)

Staff from my office visited South Hedland last year to talk to young people involved with the youth justice system for my report, *Speaking out about Youth Justice*. A range of issues that impacted on children and young people were raised including:

- the incidence of Fetal Alcohol Spectrum Disorder (FASD), which affects many young people from the area, including those in contact with the youth justice system, and that there were substantial difficulties obtaining a diagnosis; and
- the lack of ‘in situ’ drug and alcohol rehabilitation places which is impacting on families in South Hedland.

It was clear from conversations with local people that culturally-based programs to re-engage children and young people within schools are needed. Programs with a sound evidence-base and built-in evaluation processes are required so that improvements and further roll-out and funding opportunities can be explored. Complementary to disengagement programs; diversionary style programs are also needed, which are critical to dealing with the issue of juvenile offending in the Pilbara. Meaningful

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\(^{10}\) Australian Bureau of Statistics, 2016 Census of Population and Housing, General Community Profile, Pilbara (Mining and Pastoral).

\(^{11}\) Australian Bureau of Statistics, 2016 Census of Population and Housing, General Community Profile, Karratha, Statistical Area Level 2.
activities for children and young people in these communities are also part of the solution as well as better transport links for people to access activities, services and opportunities in the local areas.

Earlier this year, I engaged local partners, the 'Youth Involvement Council' in Port Hedland to talk to children and young people about the impact of alcohol on their lives. They spoke to a small group of children aged 10-12yrs. From the feedback we received it is clear that these children see daily use of alcohol either in their families or in their community. They all spoke about not feeling 'safe' in their homes or communities and it was obvious to those running the workshops that all of the children attending the workshop were affected personally when asked how they felt about alcohol in their community. This information was incorporated into my submission in support of the application for restrictions on the availability of packaged liquor in Port Hedland and South Hedland dated April 2017. I have included this information again in this submission because the impact of alcohol abuse on children and young people is consistent regardless of the geographical location in which the alcohol abuse takes place; as such the implementation of Pilbara wide restrictions is the best way to protect children and young people and insert a circuit breaker into the cycle of alcohol addiction and abuse.

In my recent visit to Roebourne in August 2017, it was apparent that alcohol abuse plays a role in the dysfunctionality of some families and creating concerns for the safety and security of children and young people in the area. Improving the safety of vulnerable children and young people requires a complete and unyielding focus on establishing a commitment and culture of safety among service providers, families and community members themselves. Alcohol restrictions are simply a tool to allow community leaders, with external support, to lead change within the community and allow service providers the opportunity to re-engage with families with complex needs in a constructive and supportive manner to address the underlying issues of intergenerational trauma, disadvantage and family dysfunction.

Conclusions

As Commissioner for Children and Young People in Western Australia, I have a statutory obligation to advise government and raise awareness in the broader community about the best interests of children and young people. My role is also to articulate the views and to give voice to the children and young people about issues that affect them. Children and young people's best interests, their safety and their futures should all be at the forefront of considerations about issues which impact them, including the availability of packaged liquor in our communities.

As such, I strongly support the introduction of restrictions on the availability of packaged liquor in Karratha and its surrounding areas, and a strategy to apply broad and consistent restrictions across the Pilbara. These restrictions must be implemented alongside a holistic suite of measures and advocacy work to support and promote
change in the community, which together will help to significantly reduce alcohol abuse and its associated harm in these towns.

Such action should be complemented by long term resourcing of community-led, including Aboriginal led, initiatives aimed at reducing alcohol consumption in the community. The underlying reasons why people drink need to be addressed as well as providing intensive supports to those who drink excessively to enable them to reduce their drinking as part of the medium-longer term strategy.

I support the restrictions proposed by the police but note that there is a need to ensure that any restrictions imposed are easy for the communities to understand and are consistent with restrictions in other similar areas in WA. I note that adaptation of restrictions for locally-based issues is in the public interest but this need must be balanced by the need to ensure that communities and those travelling between communities can easily understand the restrictions in place and abide by them.

I understand that the City of Karratha conducted a community poll which resulted in a decision not to implement the proposed liquor restrictions. It is important that the community in Karratha be informed about the reasons for the restrictions if they are implemented. Education, using evidence and research, should be provided to the community to ensure that they understand the decision made by this Inquiry. This should be progressed alongside the implementation of any restrictions.

Evidence from other locations, such as in Halls Creek and Fitzroy Crossing, show the effectiveness of more stringent packaged liquor restrictions, including a significant reduction in antisocial behaviour and increased school attendance\(^\text{12}\). If restrictions are introduced, it is important to be able to measure and evaluate their impact and also take a long term view of what outcomes government would like to see before any restrictions are lifted, such as a target for school attendance rates, for alcohol-related offences and for alcohol-related hospitalisations. The community should be involved in these discussions to encourage ownership of the problems and engagement in solution development. This thinking should be progressed alongside any restrictions so that comparison data from pre- and post-restriction periods can be collected and used as evidence in future.

A recent survey showed that 78% of Australian’s believe that more needs to be done to reduce the harm caused by alcohol\(^\text{13}\). I encourage you to support those that deal with the impact of excessive alcohol consumption on a daily basis by imposing sufficient restrictions to significantly curtail alcohol consumption and reduce the associated alcohol harms in these communities in the interests of children and young people.


In conclusion, it is my assessment that it is in the best interests of the children and young people in Karratha and surrounding areas that restrictions on the availability of packaged liquor are imposed and I fully support this application by WA Police.

Yours sincerely

[Signature]

COLIN PETTIT
Commissioner for Children and Young People WA

27 November 2017