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Royal Borough of Greenwich
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SE18 6HQ

11th January 2016

RE: Licence review of Khyberway Off Licence (aka Seeray), 2 Bannockburn Road, Plumstead, SE18 1ES

As Director of Public Health (a responsible authority under the Licensing Act 2003) I wish to make a statement in support of the review brought forward by the Trading Standards Service, on the grounds of **protection of children from harm and public safety**.

We understand that the Trading Standards Service is asking the sub-committee to consider all options available to it in relation to the activity of local retailer, Khyberway. We are of the view that should they maintain their licence with its current conditions this will threaten the protection of the wider public health.

Khyberway have demonstrated by past offences (as outlined in the licence review application) that they cannot be considered to be a responsible retailer particularly when it comes to the sale of duty-evaded alcohol, the protection of children from harm from the sale of tobacco; and public safety in relation to the sale of tobacco not meeting EU safety standards and the availability of counterfeit tobacco. Although not a primary factor determining the support of the Director of Public Health for a review of this licence, it should be noted that alcohol-related ambulance call outs within 100 metres of this premise fall within the top 1% for volume within Greenwich, including for young people (aged under 26), according to Safestats (a range of data collated by the Greater London Authority's Community Safety Team), for the year to September 2015.

It is a core responsibility of Public Health to protect the public from harm and maintain public safety. The consumption of alcohol has large impacts on health and wellbeing, with 1.5% of deaths are directly linked to alcohol. 6% of hospital admissions in Greenwich can be attributed to alcohol, with patients presenting with acute intoxication, dependence, liver disease, cancers, cardiovascular conditions, digestive conditions and injuries. Alcohol is also associated with mental health problems, relationship breakdown, violence and antisocial behaviour. Around half of violent crime may be related to alcohol. Alcohol is considered the sixth biggest risk factor contributing to the burden of disease in Western Europe (after smoking, hypertension, obesity, physical inactivity and high blood sugar).

Large numbers of people drink hazardously and have increased risk of disease and death. In Greenwich, more than 43,000 adults regularly drink more than the recommend level of 14 – 21 units of alcohol per week. As the guidance on recommended levels for men has been revised downwards to 14 units of alcohol per week in January 2015, the number of adults drinking above recommended levels will be even greater than 43,000. Hazardous drinkers are three times more likely to develop liver disease than people drinking lower amounts. The rate of alcohol-specific mortality for Greenwich is 10.1 per 100,000. This is higher rate than the London average.

Properly produced and certified alcoholic drinks are made from ethanol - alcohol that is safe to drink in moderation, although harmful if drunk in excess. The retailer's actions in selling duty-evaded alcohol, of which there was no way of the retailer determining the purity of the product, demonstrates that they cannot be considered a responsible retailer. If they are prepared to sell duty-evaded alcohol, there is a risk that they could also sell counterfeit alcohol, which can cause even greater harm to health than regulated alcohol. Counterfeit alcoholic drinks can be produced using cheaper types of alcohol which can have serious adverse health effects. Commonly used substitutes for ethanol include chemicals used in cleaning fluids, nail polish remover, and automobile screen wash, as well as methanol and isopropanol which are used in antifreeze and some fuels. Drinking alcohol containing these chemicals can cause nausea and vomiting, abdominal pain, drowsiness and dizziness. This can lead to kidney or liver problems and even coma. Methanol, the substance which has been found in fake vodka can cause permanent blindness.

In addition to risking public safety through the sale of duty-evaded alcohol, the retailer has failed to protect children from harm, and indeed risked public safety, through the presence of counterfeit and non-EU tobacco on the premises.

Smoking tobacco is the single greatest cause of illness and premature death in London today. Nationally smoking kills an estimated 86,500 people a year, accounting for a third of all cancers, and a seventh of all cardiovascular diseases. The Royal Borough of Greenwich has been successful in reducing smoking prevalence from around 24% to 16.6% in recent years. Despite this, between 2011 and 2013 there were 918 deaths from tobacco. Most adult smokers start smoking young – 66% of regular smokers start before the age of 18, and 39% start before the age of 16. Nearly all regular smokers (95%) start before the age of 25. The long term success of tobacco control is therefore highly dependent on reducing smoking initiation among children and young people.

Data from the 2014 SHUE survey of GREENWICH school children shows that by Year 8 (12 and 13 year olds), 10% of children have smoked, rising to 37% by Year 10 (14 and 15 year olds) school children have smoked. The younger the age of uptake of smoking, the greater the harm is likely to be because early uptake is associated with subsequent heavier smoking, higher levels of dependency, a lower chance of quitting, and higher mortality. Child and adolescent smoking causes serious risks to respiratory health both in the short and long term. Children who smoke are two to six times more susceptible to coughs and increased phlegm, wheeziness and shortness of breath, than those who do not smoke. The earlier children become regular smokers and persist in the habit as adults, the greater the risk of developing lung cancer and heart disease.

Children who have obtained and experimented with cigarettes can quickly become addicted to the nicotine in tobacco. Children may show signs of addiction within four weeks of starting to smoke, and before they commence daily smoking. A US study found that smoking just one cigarette in early childhood doubled the chance of a teenager becoming a regular smoker by the age of 17 and a London study suggests that smoking a single cigarette is a risk indicator for children to become regular smokers up to three years later. High prices can deter children from smoking, since young people do not possess a large disposable income: studies suggest young people may be up to three to four times more price sensitive than adults.

There have been three complaints in the last year regarding the retailer selling cigarettes, including single cigarettes to children, thus posing a very serious risk to children, as set out above.

The presence on the premises of cigarettes not for the UK market, some of which are counterfeit, and which failed the RIP safety test demonstrates that the retailer is prepared to risk public safety, and is further evidence of not being a responsible retailer.

Thank you for your consideration of our statement.

A handwritten signature in black ink, appearing to read "Steve Whiteman", with a long horizontal flourish extending to the right.

Steve Whiteman