

Community Consultation
City Wide Dry Area Review
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Adelaide SA 5001



By email: yoursay@adelaidecitycouncil.com

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RE: *City Wide Dry Area Review*

Thankyou for your invitation to submit feedback to The Adelaide City Council's *City Wide Dry Area Review*. As the peak representative body for the non-government health and community services sector in South Australia SACOSS acknowledges the review is of key interest to a number of our member organisations. We are keenly aware that the prohibition of alcohol consumption from the public areas where these services are located could significantly affect their operation.

SACOSS has previously made submissions to the Council on the subject of dry zones (2001 and again in 2007), but unfortunately, at this time we have been unable to consult adequately with members to provide a substantiative submission to your review. However, our general approach and concern remain as outlined in those earlier submissions. For more detailed comment about the effects of an extension of city dry areas SACOSS refers to and supports the submissions made by the South Australian Network of Drug and Alcohol Services (SANDAS) and Independent Community-wide Homelessness Administrators Group (ICHAG).

We note that neither ICHAG nor SANDAS were originally invited to submit but have negotiated to be included. The issue of them not being asked to provide submissions in the first place is a major oversight that caused some confusion within the community services sector. It also leads to concern that other important stakeholders may have been overlooked and not adequately represented in the review.

After conversation with the Adelaide City Council about the review process and discussion with a number of our interested members, we want to express our disappointment with the review process. We consider the process to be flawed and unlikely to result in a proper representation of public opinion.

The information in the initial invitation and information package led SACOSS to believe the consultation was open to all interest groups to provide feedback. We later found out this was not the case when a member group contacted us to report they were unable to submit to the review. Our member had been told by Adelaide City Council that SACOSS would be representing their interests in the review.

Upon investigation, Adelaide City Council confirmed to us that submissions would only be accepted by invitation. When asked how the selection was made as to who would be invited, the response from Council was twofold: firstly, that only representative (peak) bodies would

be invited and secondly, that the council was seeking an "even spread" of submissions reflecting a range of viewpoints. The reason was given that review did not want to receive numerous responses that were overly weighted in one or the other direction.

SACOSS believes this is a significant flaw in the consultation/review process and finds it difficult to understand how the Council will assess its results and make recommendations regarding the extension of the dry area. Such a review process will simply generate information about the range of views currently held in the community but will give no indication to the importance or weight of such views, or the significance of the issues at stake for disadvantage members of the community.

SACOSS suggests that the Adelaide City Council improves its consultation process by reopening and extending the submission deadline to include the feedback from all interested parties. Certainly SACOSS believes the Adelaide City Council should refrain from making recommendations regarding the extension of dry zones on the basis of this review as it stands.

Yours,

A handwritten signature in black ink, appearing to read "G. Ogle". The signature is written in a cursive, flowing style.

Dr Greg Ogle
Snr Policy and Research Analyst
A/g Executive Director