



OBSERVATORY

Civic Association

60 Trill Road
Observatory
7925
8th November 2021

Western Cape Liquor Authority
3rd Floor
Sunbel Building
3 Old Paarl Road
Bellville
7530

Comment: Petrol Station Applications

Further to the invitation for comments on liquor licence applications received by the Western Cape Liquor Authority (WCLA) to permit the sale of alcohol at petrol station convenience stores, the Observatory Civic Association would like to make the following comments.

1. We do not support the granting of liquor licenses to establishments seeking to sell alcohol from convenience stores at petrol garages. We believe it is neither in the public interest to allow such sales, nor does it protect people from potential adverse impacts of such sales.
2. South Africa already has an enormous problem with alcohol. We have a drinking population who consume alcohol in highly hazardous ways. This has been firmly documented over the past decade and we rate in the top 10 countries for hazardous drinking.
3. Alcohol-related traffic accidents (both fatal and non-fatal) are a scourge on our society. Motor Vehicle Accidents associated with drunk driving were responsible for 6.9% of all premature deaths in the Western Cape in 2000, a percentage higher than that for the country as a whole (https://www.westerncape.gov.za/other/2007/8/bod_traffic_injuries_workgroup_.ppt) The cost to economy of drunk driving is about R 30 billion and an estimated 24% of SA driver deaths and non-fatal injuries would be prevented if drivers were not driving under the influence of alcohol (see http://www.scielo.org.za/scielo.php?script=sci_arttext&pid=S0256-95742014000200023). This is both a huge public health problem and an enormous drain on our economy.
4. The easy availability of alcohol is one of the chief drivers of our alcohol problem in South Africa and the Western Cape Alcohol Harms Reduction Policy explicitly targets the reduction in easy access to alcohol as a strategy to reduce harms. Enabling drivers to purchase their alcohol whilst

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filling up with petrol is simply making it much easier to access alcohol in a completely uncontrolled way. It will exponentially increase the Liquor Outlet densities in our suburbs when Liquor outlet density is one of the main drivers of alcohol-related social and health problems. That is why the W Cape Alcohol Harms Reduction Policy intends to put brakes on the density of outlets permitted in an area.

5. It is recognised that the current law in the W Cape does not allow for questions of liquor density to be properly considered in the granting of a license and that amendments to the law are presently being developed. The granting of a liquor license to one petrol station convenience store will open the floodgates for multiple applications and will pre-empt any science-based regulatory action to control liquor outlet density.
6. We are well aware that not everyone who will purchase alcohol at a petrol station convenience store is a problem drinker. But amongst drinkers in South Africa, approximately 40% consume alcohol in risky ways. If only one out of every 10 purchasers were to drink their alcohol while driving, we have still created the opportunity for a drunk driver to (a) drive illegally and (b) crash their vehicle, risking human life and incurring economic harms to themselves, third parties and thus to the economy. It is therefore absurd to be selling alcohol at garages in a population which is unable to drink in moderation – we are setting up a fatal accident at some point.
7. Those who are victims of having lost family members due to drunk driving articulate the reasons for opposing licenses to petrol stations in general very clearly – see, for example, a mother quoted expressing her concern regarding the sale of alcohol at petrol station forecourt shops at <https://www.capetownetc.com/news/watch-bereaved-sa-mother-says-no-to-the-sale-of-alcohol-at-petrol-stations/>.
8. Note that other provinces (LZN and Limpopo) do NOT permit sales of alcohol from petrol stations for this reason – see the attached letter from the Office of the Premier in Limpopo which refers to the National Liquor Policy, 2016, which specifically recommends that premises attached to petrol stations should not be awarded liquor licenses. They do so for good reason.
9. The experience of having purchased items at these convenience stores make it clear that it is unlikely that these small outlets will have sufficient staff to prevent purchase by underage persons, who may simply say they are buying for an adult who is filling up the car with petrol. In general, smaller store are less able to enforce regulatory measures.
10. These applications will also lead to a proliferation of outlets selling alcohol, making it even more difficult for local communities to get redress for complaints from SAPS or WCLA inspectors, since their workload, already high, will escalate considerably. The burden of ensuring adherence to license conditions across multiple small outlets, will add considerably to pressure on the inspectorates and police and likely lead to more disillusionment in communities in the ability of the system to protect them.

For these reasons, the OCA strongly opposes the granting of these licences at convenience stores located at petrol garages. There is simply no compelling public need for more outlets when we already have extensive numbers of liquor outlets available to those who wish to purchase alcohol. The linking of alcohol sales to vehicle transport is particularly egregious.

We believe the WLCA should seek the best international research evidence before considering any policy on this matter. We believe that evidence shows that, for our South African context, liquor should not be sold at all at these convenience stores located at petrol garages.

Thank you for the opportunity to comment

Yours sincerely

Leslie London
Chairperson