



OBSERVATORY
Civic Association

60 Trill Road
Observatory
7925
10th December 2023

The Director-General: Social Development
Private Bag X 901
Pretoria, 0001

e-mail: VathiswaD@dsd.gov.za or MogotsiK@dsd.gov.za or SizaM@dsd.gov.za

For the attention of: Mr Kalaeamodimo Mogotsi or Ms Vathiswa Dlangamandla or Ms Siza Magangoe.

Dear Mr Mchunu

Comment on the Prevention of and Treatment for Substance Use Disorders Policy (Government Notice 4058 of 10 Nov 2023)

I write as the chairperson of the Observatory Civic Association¹, a community-based organisation representing residents and businesses of the Observatory community, Cape Town South Africa. We are a registered Non-Profit Organisation and part of our mandate is to represent the interests of the community in civic matters and in matters as affecting the wider community of Cape Town.

We are a member of the Southern African Alcohol Policy Alliance and we support its submission made in terms of the call for comments on the Department of Social Development Policy (DSD) on the Prevention of and Treatment for Substance Use Disorders (SUDs). We add our own comments as a Civic Association here, based on feedback from our members.

We first wish to acknowledge the efforts of DSD to put a progressive policy in place that seeks to limit harms to people using substances and to maximise the availability of service for the prevention and treatment of SUDs. We believe this is a very important and positive step take by DSD and welcome the opportunity to provide comments.

¹ See <https://obs.org.za/>

As a community in which we see the consequences of SUDs regularly, with a high prevalence of SUDs amongst the population living on the streets of Observatory, we are very concerned that programmes should be in place to assist people who want to stop using and to help to address the factors that lead to SUDs. For the past 5 years, our Civic has been engaging with people who are homeless / living on the streets / living in precarious conditions for whom SUDs is a major challenge. We also are regularly involved in liquor license applications being asked for comments and taking up issues related to the consequences of harmful use of drugs and alcohol for community members. We also are concerned for the wider impacts of Substance Abuse on our society and on our health and social services and believe that every effort should be made, involving both government and communities, to address substance abuse. We therefore welcome DSD's attention to this challenge.

Our comments are as follows:

- a. We believe the policy should interface with other arms of government to ensure there is greater input from communities into decisions on liquor licensing decisions - who is awarded and how many liquor licenses are awarded. For example, at the moment, (in the W Cape), the density of liquor outlets plays no role in whether a license is awarded or not, meaning a local community can have a very high number of liquor outlets trading but that is not factored into a decision to grant a new license or not. Observatory, for example, is an area with liquor license densities already close to the highest in Cape Town but this is not a factor that can currently be made part of decision-making. If the process of granting a license is to be evidence-based, the policy should make that part of the decision-making given the evidence that liquor outlet density is a major factor in substance abuse and substance-related harms.

This is a concern shared by other Civic Associations with whom we regularly engage.

Another example of intersectoral action that should be supported by DSD is the fact that our Department of Basic Education appears unaware that permitting alcohol to be sold in schools has any untoward consequence for the SUD epidemic we have in South Africa. We have two schools in our suburb and have engaged with assisting learners with safer schooling and supporting school activities, including their fundraising days. At the same time, we have supported SAAPA's campaigns against any alcohol in schools, even if it is being sold to raise money by a School Governing Body. Schools should be alcohol free and should model for youth that alcohol is not just another commodity. The DSD policy would be improved if it could provide for more effective intergovernmental collaboration to address SUD prevention and treatment.

- b. We believe a policy should provide uniform clarity for sellers of alcohol that does not leave harm reduction measures to the market. Our Civic attempted to approach one of the new owners of an existing bottle store to ask that they desist from selling the cheapest of alcohol to homeless persons because of its social impacts. We know from research that the cheapest of

alcohols are purchased in order to feed Alcohol Use Dependence and for quick drunkenness. The consequences, not just for persons living on the streets but for others, is that alcohol related harms rapidly escalate – crime, Gender-based violence (GBV), injury and illness, both of the person consuming and to family members, friends and third parties.

However, the owner of the bottle store declined, citing, amongst other things, the fact that other bottle stores will continue to sell alcohol. But if the playing field were level for everyone, then every bottle store would need to comply. So, given that price is one of the key drivers of hazardous consumption (i.e. cheapness), then price measures will reduce the amount of alcohol consumed and the amount of drunkenness on the streets and the risks of Use Disorders. Minimum Unit Pricing (where you have to have a floor price per gram alcohol in what you sell) will take the possibility away that cheap booze can be poured down the throats of people with Substance Use Disorders. That is a policy proposal that came out from Provincial government earlier this year and we supported it for the above reasons.

We believe the DSD Policy could be stronger on intervening to give local communities the leverage to engage locally to reduce harms from substance use and from SUDs.

- c. In this month of taking action to reduce Gender-based violence (GBV), it is clear that public statements by our leaders focus on reducing the scourge of GBV but we cannot do that without measures to reduce the harmful consumption of alcohol and other drugs. We would like the policy to emphasise the plans to work across sectors, using evidence-based strategies, to address the factors driving GBV and the SUD epidemic, and to put in place policies to deal with the consequences – e.g. safe houses for women, etc.
- d. While we support the use of increased taxation in general as a measure to reduce consumption of alcohol, we note that the policy does not distinguish between cannabis use for medicinal purposes and cannabis for recreational purposes. DSD may want to consider treating medicinal use of cannabis differently to use of cannabis as a recreational drug so that the latter is not penalised in the same way. Since the policy is cognisant of the need to balance economic development with the prevention of and treatment of SUDs, this might be an appropriate way to ensure both objectives.
- e. For people wanting stop using substances, access to assistance is essential. For medical issues, access to healthcare is relatively simple - you go to the clinic or a GP who then guides you through relevant care. There is no comparable access point for substance abuse issues, or, if such access points exist, they are not advertised properly.
- f. Additionally, we know there is a desperate shortage of services for treatment of people with drug and alcohol disorders that are affordable and accessible. Since community upliftment

projects that aim to help people on the streets will need access to services for persons with dependence, it is hard to achieve success without having such services available. And treating persons with SUDs will have less chance of successful outcomes if the person returns to the same circumstances they faced when entering addiction. For that reason, we would look to the policy to improve the availability of both services for treatment but also support for community development. When local community members in Observatory wanted to initiate local projects that divert young people from lifestyles that hook them into drugs and alcohol, we found it very hard to identify NGOs or other organisations with the capacity to assist the local community to develop community driven interventions. We would like to see the DSD policy enhancing treatment access along with enhancing community initiatives that aim to ameliorate the environment that drives substance use. In particular, since many people living on the streets (not all) are there with substance use disorders, the policy also needs to reference the intersectoral actions needed to address homelessness. The situation of persons living on the street needs DSD's attention.

- g. It is difficult to find information for the public on what services are available and how to counsel & support someone to stop smoking, or for concerned friends / family members to intervene for alcohol or substance abuse issues - who to ask for counselling and support, as well as where to get treatment & how to support the person in recovery. If DSD could play a more active stewarding role for sharing such information, the policy would be stronger.
- h. Lastly, Observatory is an area with a high proportion of university students – transient populations who enjoy the culture, nightlife and ambience of a relaxed bohemian suburb. We know that University students are populations in whom risky drinking can become common and drinking patterns can be established for life. We are aware that for many universities, the impacts of alcohol and other drugs on students well-being is substantial and can be very disruptive for other students and for the students own performance and well-being. For communities with many students (such as is the case for Observatory) harmful use of alcohol and drug can have major impacts. We would like to suggest that DSDs policy put in place partnerships with the Higher Education sector to address risky substance use amongst the student population, and include local communities in that partnership where there are high concentrations of students living and partying in those communities.

We trust these comments will be useful in DSD's consultations.

Yours sincerely



Leslie London
Chairperson Observatory Civic Association

DCAS Award Winner, 2018 for Most Active Conservation Body; NPO number: 174 - 174 NPO
60 Trill Road, Observatory, 7925; phone 082 731 0830
