



11 February 2015

Upper Hutt City Council  
Private Bag 907  
Upper Hutt 5140

To whom it may concern

**Re: Submission on Upper Hutt Local Approved Products Policy**

Thank you for the opportunity to provide a written submission on this consultation document.

Regional Public Health (RPH) serves the greater Wellington region, through its three district health boards: Capital and Coast, Hutt Valley and Wairarapa and as a service is part of the Hutt Valley District Health Board.

We work with our community to make it a healthier and safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff cover a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts. Our organisation has an important role in the monitoring and enforcement of the psychoactive substances legislation.

The use of psychoactive substances is a concern in the community, from individuals, families, local businesses and community providers/ services. The use of these mind-altering products requires a response that allows for close scrutiny and monitoring of such substances. Surveillance, regulation and enforcement are therefore vital in the effective management of these products. Such actions will assist in limiting the negative health and social effects that may occur with their use.

RPH commends the Upper Hutt City Council on their proactive decision to restrict where sellers of psychoactive substances can be located through the development of a Local Approved Products Policy.

**General comments**

Our submission is in line with the Ministry of Health's framework for National Drug Policy in New Zealand which adopts strategies in supply control, demand reduction and problem limitation.

Protecting the people most at risk of harm from psychoactive substances is assisted by reducing access to psychoactive substance retailers near sensitive sites, while maintaining a balanced approach by allowing a small number of approved retailers to sell psychoactive substances safely and responsibly.

We support a restriction on the number of outlets, both retail and internet, that supply approved products. Having fewer outlets allows retailers to better track and report users who may be experiencing harmful affects, and enables enforcement officers to more closely monitor retail activity.

**Regional Public Health supports:**

- The purpose of the draft policy and the intent of the Psychoactive Substances Act 2013.
- The contents of the draft policy i.e.
  - the location of outlets, these being restricted to those directly on Main Street
  - reducing the number and density of premises selling psychoactive substances. We support the minimum distance between each outlet of 300m
  - restricting the location and proximity of premises selling psychoactive substances to be at least 50m metres away from early childhood centres, schools, places of worship and community facilities.

**Matters of concern**

Whilst we are supportive of the policy content we have some concerns with the Main Street location. We believe it is preferable to restrict the proximity of psychoactive substance outlets away from areas that are attractive to youth. These areas include fast food outlets, licensed premises, bus interchanges, and other areas where youth may congregate. The proximity of nearby fast food outlets to upper Main Street and The Mall, on the upper reaches of Main Street, makes the area a popular one for youth.

However, having investigated alternatives, we have not been able to identify options which adequately satisfy all our criteria for minimising harm. We believe that, while this policy is not ideal, it is the best that can be achieved given the criteria in the legislation.

Regional Public Health strongly believes that psychoactive substances should only be sold within locations that allow for public scrutiny and surveillance. Outlets should only be located in areas that have good sightlines, regular foot traffic and other safety features such as CCTV cameras. Having a high level of public surveillance reduces the risk of harm to people using psychoactive substances, and illegal activities associated with the sale of psychoactive substances.

Given the concerns regarding exposure to youth from the Main Street location very high levels of surveillance will be required. Surveillance will need to extend beyond the Main Street retail area and into neighbouring areas where youth congregate.

We are happy to provide further advice or clarification on any of the points raised in our written submission.

The contact point for this submission is:

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Regards

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