



16 February 2015

Kapiti Coast District Council  
Private Bag 60601  
Paraparaumu 5254

To whom it may concern

**Re: Submission on Kapiti Coast District Local Approved Products (Psychoactive Substances) 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.

We have an important role in the surveillance 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 commend the Kapiti Coast District Council on their proactive decision to restrict where sellers of psychoactive substances can be located through the development of a Local Approved Products Policy. We further commend the council's process in developing this draft policy for public consultation. Working closely with our organisation and with Police, two key agencies that will have an important function in monitoring and enforcing of these products has enabled the agencies to provide expertise that has informed the draft policy.

Regional Public Health supports:

- The intent of the Psychoactive Substances Act 2013 which allows for local approved products policy
- Policy option C, Location - Kapiti Road West, as points of sale for psychoactive substances.

In that location we support

- Reducing the number and density of premises selling psychoactive substances. We support a minimum distance between each outlet of 100 metres.
- Restricting the location and proximity of premises selling psychoactive substances to be at least 100 metres away from kindergartens, early childhood centres, schools, places of worship, youth centres, mental health and addiction services, recreation grounds, places of known congregation and sites of cultural significance.

The following are direct responses to the tabled questions in the consultation document.

**How many outlets should we have in the District?**

The outlets will naturally be restricted by the proximity limitations and allow for a limited number of stores in the selected area. The maximum number would ideally be determined by how effectively the area can be monitored and the levels of harm in the community.

**Which option do you prefer for the location of retail outlets A, B, C or D?**

Option C: Kapiti West Road

The area identified in option C keeps the sale of psychoactive substances some distance from residential areas, particularly the more vulnerable communities. The designated area is highly visible and will assist in surveillance. Further the constrained area with its high visibility will encourage a high standard of operation from the businesses. The confined area will limit the overall number of businesses that can operate in the location.

Regional Public Health believes it is preferable to keep the sale of psychoactive substances away from areas that are attractive to children and young people. Our preferred area satisfies this criterion.

**How far apart should the licensed retail outlets be?**

We support the minimum proposed distance of 100 metres (note we have considered this with reference to our preferred option C).

**What facilities should be considered sensitive sites?**

We support those given in the policy. We also support communities having a say in determining any additional sites of local significance.

**How far should a licensed retail outlet be from a sensitive site?**

We support the minimum proposed distance of 100 metres (we have considered this with reference to our preferred option C).

**Any further 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 promotes the message of de-normalising the use of mind altering substances. For this reason it is preferable to restrict the proximity of psychoactive substance outlets away from areas that are attractive to youth and vulnerable/at risk communities. These areas include fast food outlets, licensed premises, bus interchanges, areas attractive to youth and mental health drop in centres.

The creation of buffer zones from sensitive sites will reduce the exposure to young people and those people vulnerable to the harmful effects of these products.

Regional Public Health believes that psychoactive substances should be sold from premises 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.

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:

Andrea Boston

Public Health Advisor

Email: [Andrea.Boston@huttvalleydhb.org.nz](mailto:Andrea.Boston@huttvalleydhb.org.nz)

Ph: 04 570 9138

Regards

Dr Stephen Palmer  
**Medical Officer of Health**

Peter Gush  
**Service Manager**