

AFS COMMENT ON ABERDEENSHIRE DIVISIONAL LICENSING BOARDS' STATEMENT OF LICENSING POLICY (SEPTEMBER 2018)

Alcohol Focus Scotland (AFS) welcomes the opportunity to comment on Aberdeenshire Licensing Boards' Statement of Licensing Policy (SLP). The licensing system plays a key role in minimising the risks of harm to individuals and society from the sale and consumption of alcohol. AFS is therefore keen to support the development of licensing policy and practice in Scotland that works most effectively to prevent and reduce alcohol related problems.

As a national organisation, we offer our opinion on the general approach, policy direction, and emerging issues relevant to alcohol licensing, which we hope the Licensing Boards will find useful. We have also provided suggestions regarding the sections of the draft policy which we believe may warrant particular scrutiny.

As a general point, AFS would recommend that the Boards includes details of the evidence they considered in developing the policy. Boards should be explicit and demonstrate within their policy how they have been informed, with the material considered being published and links to this material being included in the policy itself. Stating this in the policy statement helps demonstrate the reasoning for the Board's agreed position and its responsive approach to consultation. We note the Boards' Supplementary Policy 2, which details the consultation process and documentation; we would recommend that the material considered by the Boards is summarised in the final policy with links to this material being included.

Links with other strategies

Licensing activities should be aligned to the work of a broad range of local partners to bring about improvements for individuals and communities. In particular, it will be important that the new policy recognises the value of linkages with other bodies interested in alcohol regulation, and specifically references the policies and strategies that are most relevant to the work of the Board.

As alcohol licensing is the responsibility of licensing boards, it is essential that boards can identify where they share similar objectives to community planning partners, and understand how they can best support each other towards these ends. In many respects, licensing boards and CPPs are already working towards shared goals and stand to benefit from more collaborative approaches. It will therefore be important that the new Licensing Policy aligns with community planning Local Outcome Improvement Plans (LOIPs). As such, we are encouraged to see reference to the LOIP within the statement, although we would suggest that this is placed within the body of the main statement rather than solely referenced within the appendix.

The Boards should also take into account the views of local partners, the Forum, communities, and other strategies and plans that have relevance to alcohol when developing and implementing their new policy. The Licensing (Scotland) Act 2005 and accompanying guidance should inform the Boards' approach to how this can best be achieved, for example by responding to the recommendations of the Forum.

In addition, the work undertaken by the Alcohol and Drug Partnership will be of particular significance, and the new policy could signpost people to where they can access a copy of the ADP's Delivery Plan. AFS would also recommend that the new policy references relevant locality plans, and the strategic plan of the Health and Social Care Partnership (HSCP).

Scotland's alcohol strategy '*Changing Scotland's relationship with Alcohol a Framework for Action*' is also of key relevance to the policy and should be referenced. This established a whole population approach to reducing alcohol harm and identified action on availability as one of three key mechanisms - alongside price and marketing - to achieve this. The Scottish Government's consultation on the strategy, published in 2008, recognised that the main mechanism for controlling alcohol availability was licensing legislation.

Licensing boards are also bound by human rights legislation. Action on human rights in Scotland is currently being driven through Scotland's National Action Plan for Human Rights (SNAP) and there is a range of links between alcohol-related harm and the realisation of human rights in Scotland.

Transparency, accessibility and participation

A lack of effective public engagement in licensing can prevent proper transparency and accountability. During a series of regional licensing seminars, hosted by AFS in 2016, a lack of public participation in licensing was reported across the country. Barriers to participation can relate to poor accessibility of licensing processes, but inconsistencies in policy and practice can also prevent meaningful engagement.

AFS would suggest that the Boards' policy should include a commitment that the Board will conduct its business in an open and transparent manner, and that it provide detail about the means by which the Boards' processes and procedures will ensure increased accessibility, transparency and accountability for communities. For example, participants at the 2016 regional licensing seminars recommended that Boards require to have:

- a set of published standing orders;
- board papers and minutes being published on time;
- board minutes recording the names of board members voting for/against a decision; and
- details to be made available of what people can expect when attending meetings and the supports available to them.

The new policy could also have an increased focus on supporting public engagement and participation. Communities may not currently be aware of the various ways in which they can get involved or the types of information/supports available to enable them to participate. The new policy should more clearly signpost the general public to where they can find guidance to support them to get involved, including by making objections and representations, or this could be included as an Appendix e.g. the [Alcohol Licensing in Your Community Toolkit](#).¹ The current section of the policy outlining the role of the Licensing Standards Officer could also be expanded to include more detail about the assistance they are able to offer to the public.

The policy could also include a commitment that the Boards will attempt to make the experience of attending a hearing as informal and friendly as possible. This can be a particularly important commitment for many community members, who may feel intimidated by overly formal processes and environments. It would be helpful if the policy were to outline the procedure to be followed at hearings, such as in an appendix.

In addition, policy statements should be easily understood by all licensing stakeholders, including by members of the public without technical expertise. Ensuring that the new policy is written in plain, accessible language could help facilitate the involvement of a wide range of stakeholders. AFS is pleased to see a number of positive changes to the policy that aim to make the policy more easily accessible and easier to read. This includes hyperlinking the document where possible; the use of colour, pictures and icons; and the inclusion of a glossary at the end of the document. The joining of the three Divisional Licensing Boards' policy statements also contributes to increased accessibility of the policies.

Further details about accessibility and participation in licensing can be found in AFS's 2017 report *Taking Stock*.² This report analyses experiences of progress within the alcohol licensing system in Scotland since the Licensing (Scotland) Act 2005 was implemented in 2009. Informed by the views of over 170 licensing stakeholders, it also identifies learning and challenges, and makes recommendations for improvement and reform, many of which may be of interest to the Boards.

Promotion of the licensing objectives

As s.6 of the Licensing (Scotland) Act 2005 makes clear, policy statements must seek to promote the licensing objectives. For all objectives, AFS would suggest the following format:

1. State the licensing objective.
2. Give a statement as to what the licensing board is trying to achieve with this objective.
3. List concerns in the area relating to this objective – identify what evidence was used to identify these concerns.
4. List what the licensing board intends to do. Note that this could include declaring overprovision, controlling licensed hours, or applying certain conditions – referring to the relevant section/s in the policy.
5. List any suggested actions the licensing board would like to see the licensed trade in the area undertake to meet this objective.

For all the licensing objectives, the Boards have usefully defined their intended outcomes, influencing factors and listed example control measures that applicants and licence holders can put in place to ensure consistency with the objective. However, this could be greatly strengthened by providing more detail about the conditions the Boards can/will apply in relation to each of the objectives. The statement currently mentions the potential of imposing conditions in relation to a number of specific areas (late night entertainment and capacity) but could be more explicit in stating that conditions may be attached to licences based on any of the objectives. Reference to a set of local conditions is only made for **North Divisional Licensing Board**, which is welcomed; however more detail on the circumstances under which these conditions can/will apply would be useful.

AFS has produced a Licensing Resource Pack that provides resources to support the collection of evidence on local alcohol-related harm, and provides examples of research that demonstrates the impact of particular licensing conditions on harms.³ This may particularly useful to the Boards when developing their new policy.

It would also be beneficial to provide more of the Licensing Division context in relation to each objective e.g. relevant statistics or evidence of the current situation, identification of any issues that are a particular concern, measures that have had an impact, etc. We would suggest including both statistical and expert opinion, as well as any available local data, on what the issues are in each Licensing Division area. There should then be a clear line of reasoning from the evidence to the conclusions in the policy.

AFS welcomes the expectation within the policy that applicants should address the objectives when applying for a premises licence, through completion of a Licensing Objectives Risk Assessment. It is not clear whether a pro-forma is required for this purpose. This approach is already adopted in other board areas, with several providing a 'Supplementary Information' document for applicants to submit alongside their application - asking them to set out exactly how they will comply with the objectives. Having a statement of licensing objectives attached to their licence could help to focus applicants' attention on the objectives and ensure that they are afforded proper consideration in any proceedings. In addition, it is appropriate that the Boards should go further and look to the evidence in respect of each of the five licensing objectives, and the expectation that applicants provide evidence that suitable measures will be implemented and maintained. We note that the Boards reserve the right to comment on and request different information as may be required in relation to the Risk Assessments.

Specific to the objective of Preventing Crime and Disorder, the proportion of alcohol now bought to consume at home or in other private dwellings (73% of all alcohol sold being purchased in off-sales⁴) underlines the need for the new policy to reference the importance of licensing for preventing crime and disorder in private spheres as well as the public. The focus of Appendix 1 under this objective appears to be in relation to on-sales premises.

Specific to the objective of Protecting and Improving Public Health, AFS welcomes that the Boards consider that licence holders should consider making available information regarding sensible drinking. The intention behind this is admirable and this approach should continue. However, AFS would recommend that the Boards avoid using terms like 'sensible' drinking in its new policy, and instead make clear that any information provided should be based on the Chief Medical Officers' (CMO) low-risk guidelines. The Boards might also wish to consider providing materials to licensees which is independently produced. The World Health Organisation has stated categorically that the alcohol industry should not be involved in health promotion, and the Government has a duty to ensure access to information and advice on alcohol that is impartial and based on the best available scientific evidence. NHS Inform is the best website in Scotland for such health advice: <https://www.nhsinform.scot/healthy-living/alcohol>

It is encouraging to see the Boards discourage the placement of alcohol promotions at end of aisles within off-sales premises, in order to reduce impulse purchases. We would refer to evidence that end of aisle displays more generally can significantly increase purchases of alcoholic beverages.⁵ We also welcome the discouragement of the purchase of rounds of shots which encourage rapid consumption of alcohol in a short space of time.

The policy states that the Boards wish to see family-friendly premises thriving in Aberdeenshire, and AFS appreciates that some Boards wish to encourage applications for licensed events and venues which are family friendly and safe for children. However, evidence shows that children and young people are influenced by the behaviour of adults they observe and this should be taken into account when considering the appropriateness of licensing applications. It will also be important that the new policy addresses the broader impact of alcohol on children and young people, including the impact of parental drinking.

The policy sets out an expectation that applicants will provide sufficient assurances that children and young persons will not be placed at risk, however it could set out much more detail about the general expectations of the Board with regards to factors like when children and young people will normally be allowed entry, including the ages of children and young people to be allowed entry, and the times when children and young people should have access.

AFS agrees that premises which do not offer food of any description are less likely to be a suitable environment for children. There is also concern across Scotland regarding occasional licenses being granted for events mainly or exclusively targeted at families where children would be present. We are therefore pleased that there is a presumption against granting occasional licences for events that are aimed primarily at children or young persons, such as but not limited to, school sports days or children's parties.

It is wholly appropriate that any on-licensed premises to which families with children have access give careful consideration to their responsibilities to protect children from harm, and AFS would recommend that the Board requires applicants in these circumstances to demonstrate how they will promote this objective, including by providing a written statement (e.g. through the Licensing Objective Risk Assessment) as suggested above.

Overprovision

As a national organisation, we do not have sufficient local knowledge of the Aberdeenshire area to enable us to comment in detail on the specific localities and premises concerned. However, we offer our opinion on the general approach and policy direction, which we hope the Licensing Boards will find useful.

Evidence gathering

There is no simple numerical formula for pinpointing the threshold between provision and overprovision. Determining overprovision involves the application of reason and judgement in the interests of the community and Boards have flexibility in deciding if and how to address overprovision in their area.

We note the Board is currently consulting on overprovision at council ward level.

The Boards' approach appears to have been to take into account the change in overall number of alcohol outlets for 2013 and 2017 for each of these localities. This only provides a very broad overview of how the number of outlets have changed since the last policy was drafted, rather than an indication of where there may be areas with high concentrations of outlets within these localities, and neglects to consider how the distribution of the types of outlet within the localities may contribute to the availability of alcohol.

The CRESH profile for Aberdeenshire highlights that although there was a general decrease in the number of alcohol outlets between 2012 and 2016, off-sales premises actually increased by 10% (or 7% per population). With almost three quarters of alcohol bought from off-sales outlets for consumption at home, the increase in this type of outlet should be a significant consideration for the Boards. The data also shows that although Aberdeenshire on the whole has a relatively low overall level of alcohol availability, there are pockets of high availability present. For example, some neighbourhoods have double the Scottish average number of alcohol outlets. This is particularly the case for off-sales outlets, with 10% of neighbourhoods in Aberdeenshire having off-sales outlet availability higher than the Scottish average. To identify potential 'hot spots', the Boards may wish to review the density information contained in the [CRESH alcohol outlet density map](#).

In addition, information about numbers of premises should be considered in conjunction with alcohol harm statistics for the Divisional Board areas to make an informed assessment of overprovision. As regards the evidence on alcohol-related harm, the policy again tends to focus on trends in harm rates over time and in relation to specific premises, rather than 'hot spots' of alcohol-related problems. For example, under the first three objectives, the policies refer to: reduced police

call outs to licensed premises; decreased levels of assaults in licensed premises; and low levels of anti-social behaviour, crime and disorder in and around licensed premises. Where reference is made to alcohol-related violence more generally, it is to note a decrease in the overall area rather than to identify whether there are particular neighbourhoods of concern.

From the CRESH data, a number of neighbourhoods within Aberdeenshire seem to experience high levels of alcohol-related problems; for example, some neighbourhoods had very high rates of alcohol-related deaths, double the Scottish average for alcohol-related hospitalisations, and almost 7 times the Scottish crime rate.

Taking the above information into account, AFS would recommend a more nuanced and in-depth analysis of alcohol provision and alcohol-related harm rates within the relevant local areas, looking at on-sales and off-sales premises separately. This could be done through use of the [CRESH data](#) and information provided by other local stakeholders, to indicate areas where levels of availability and/or harm are sufficiently high to cause concern, and which may indicate that overprovision would be an appropriate response. An initial analysis using the CRESH data shows that there are neighbourhoods in Aberdeenshire that have higher outlet density than the Scottish average as well as very high levels of alcohol related harm. This includes neighbourhoods within Inverurie, Stonehaven, Peterhead Harbour, Banff, Huntly and Fraserburgh.

AFS agrees that the provision of sales data to boards would significantly enhance local licensing policy development and decision-making. It would also provide boards with a much clearer and more accurate picture of the availability of alcohol in a geographic area and the impact of different types of premises. However in the absence of this data, boards should make use of locally available data to build a picture of alcohol availability and harm.

Evidence analysis and assessment

AFS would suggest that the statement of licensing policy summarises the evidence and views considered by the Boards when conducting its overprovision assessment. This helps support people to understand the rationale for the boards' approach and greatly aids transparency. We would also recommend that the Boards publish any evidence considered and provide links or signpost people to where this evidence can be accessed.

Paragraph 24 of the statutory guidance states that the aim of the overprovision assessment is to "mitigate the adverse health effects of increased alcohol consumption resulting from growing outlet density". While the final assessment on overprovision is of course a matter for the Boards themselves, AFS is concerned that the Boards' conclusions on overprovision are based on the view that "the harm caused by alcohol...is not a direct and sole consequence of the number of premises but...a result of a wider, complex set of factors". There also appears to be a misperception in South and Central Divisional Boards' policies that alcohol-related problems experienced in an area need to be attributed to individual premises to be able to declare overprovision. AFS considers these statements set standards of proof that go beyond what is legally required to declare overprovision.

The guidance makes it clear that the focus should be on outlet density rather than individual premises; for example, licensing boards should not take into account concerns about individual premises, such as how they are managed. The guidance provides a list of evidence which may be taken into account by boards, including alcohol-related harm data from the police, health boards/bodies, environmental health teams, etc. If the evidence on alcohol-related harm as provided to the Boards point to the presence of alcohol-related problems in an area (such as high levels of public disorder or alcohol-related deaths or hospitalisations), then the Board can consider

whether this aggregated information and evidence “points compellingly towards” the conclusion that there is overprovision of licensed premises in a particular area or areas and that adding further provision of alcohol would be likely to compound existing levels of alcohol-related harm, rather than reduce these.

In addition, despite referencing an upward trend in alcohol-related deaths, the **North Aberdeenshire Divisional Board** states that “The Board has found no evidence to make a direct link between alcohol related harm and the number of licensed premises in any of the localities in the Board’s area.” Since 2000, over 50 separate studies in countries with mature alcohol markets, including Scotland and England, have demonstrated a significant association between outlet density and a range of alcohol problems, including: violence, hospital admissions, risky and underage drinking, alcohol-related traffic accidents, sexually-transmitted disease, and child abuse or neglect.⁶ Conversely, accumulated evidence strongly indicates that careful control of the overall availability of alcohol can make a key contribution to a range of strategies aimed at reducing crime, poverty, health inequalities, and to enhancing quality of life.

At both national and local authority level, the AFS and CRESH research published earlier this year supports this evidence, finding associations between alcohol outlet density and alcohol-related deaths, alcohol-related hospitalisations and crime rates.⁷ A statistically significant relationship was found in Aberdeenshire between the number of outlets present in a neighbourhood and alcohol-related deaths, alcohol-related hospitalisations, and crime rates.⁸ Specifically, alcohol-related deaths in neighbourhoods with the most off-sales outlets were 2.4 times higher than in neighbourhoods with the least, alcohol-related hospitalisations were 3.6 times higher in neighbourhoods with the most outlets, and crime rates were 2.8 times higher. The associations between alcohol outlet density and harm were found even when other possible explanatory factors, such as age, sex, urban/rural status and levels of income deprivation, had been taken into account. Although we welcome reference to the CRESH profile within this section, the policy would be strengthened by reference to the associations that were found between the number of outlets and levels of harm within the local authority.

It is also the most deprived neighbourhoods that have the highest outlet availability in Aberdeenshire - with 2.6 times more alcohol outlets in the most deprived neighbourhoods compared with the least. It should be recognised by Boards that communities are affected differently by alcohol provision. Recent evidence found that those who are income deprived are disproportionately affected by high concentrations of alcohol, most probably due to reliance on local amenities.⁹ AFS would suggest that the Boards give consideration within the policy as to how they have considered income deprivation data as part of their overprovision assessment.

Licensed hours

Again, we are not in a position to comment on local experiences, but can offer comment on the impact of licensed hours more generally and the evidence available to support this.

A 2017 systematic review of literature (published between 2000-2016) studying the impact of policies regulating alcohol trading times on alcohol-related harm found that policies regulating times of alcohol trading can contribute to reductions in injuries, alcohol-related hospitalisations/emergency department visits, homicides and crime.¹⁰

Extended hours increase availability of alcohol, which in turn is linked to increased consumption and increased harm. We therefore welcome the reduction in the current on-sales hours for **North Divisional Licensing Board** area, from 7am opening to 9am. We would however refer the Board to

paragraph 21 of the statutory guidance which states that, “In considering applications for licensed hours Boards may wish to consider applications for up to 14 hours as being reasonable... Any application for licensed hours for more than 14 hours should require further consideration to the effect of granting extra operating hours.” The effect of this change would be for the proposed on-sales opening hours to be from 9am to 1am, which is 16 hours. We note that the South and Central Divisional Boards have licensing hours for no more than 14 hours as standard, due to an 11am opening time.

With regards to off-sales hours, we welcome the current approach of the Boards to state that there is no entitlement to grant the maximum off-sales hours of 10am to 10pm, and that they will have particular regard to the effect that proposed off-sales hours would have in the promotion of the licensing objectives. AFS believes that the maximum permitted off-sales hours should be the exception and not the norm, particularly in areas of high-rates of alcohol harm.

We note that there is no differentiation stated for opening hours between weekdays and weekends, which is common practice within many Boards’ statements of licensing policy. The Boards may wish to consider this approach.

Occasional Licences

As stated above, there is concern across Scotland regarding occasional licenses being granted for events mainly or exclusively targeted at families where children would be present. AFS therefore welcomes the presumption within the policy against granting occasional licences for events that are aimed primarily at children or young persons.

AFS has identified that occasional licences are causing concern in some areas of the country, with licensing stakeholders reporting this as an area where ‘loopholes’ in the legislation are being regularly exploited. People have reported to us that occasional licences are significantly increasing alcohol access and availability (although they are not taken into account in overprovision assessments) and in some cases are being used to circumvent the requirement to have a premises licence to sell alcohol.

AFS recommends that Boards require a hearing where it identifies that an applicant has made repeated occasional licence applications. We therefore welcome the adoption of the policy whereby repeated applications for occasional licences for the same unlicensed premises, which are not for detailed specific events and/or are for activities that have been reoccurring regularly over the past three months or more, will require a hearing before the Board.

In order to ensure that the sale of alcohol under occasional licences is appropriately conditioned to uphold the licensing objectives, the Board could also include an Occasional Licence Application and Supplementary Information Form as an appendix. This would ask occasional licence holders to demonstrate how they will promote the 5 licensing objectives, and provide practical examples of how they plan to comply with each objective.

Alcohol deliveries and internet sales

Alcohol deliveries and internet sales are an emerging area of concern and should be considered as part of the policy development process. Remote alcohol sales and distribution across wide geographical areas have the potential to undermine local efforts to control the availability of alcohol and reduce alcohol-related harm. Online sales are not a new issue but are a continuously evolving and expanding area of retail; applications from large online retailers represent what AFS considers to be a considerable advancement of the online market for alcohol.

There is a distinct lack of information available about the business operations of online retailers, or the extent to which they contribute to alcohol sales and availability. For example, there is no data available pertaining to their distribution areas, or the volumes and types of alcohol they sell. Without this information, it is more difficult to make informed decisions about alcohol licensing or create robust alcohol policies, relevant to the needs of local communities.

A further concern relates to the potential impact of online sales to children and young people. It is unclear how age verification can and will be effectively implemented when alcohol is being purchased online, or delivered to people's homes. Unlike supermarkets, which employ their own delivery staff, online alcohol retailers may rely on various contract carriers, who may not receive any instruction in this regard. This has the potential to make alcohol much more readily accessible to young people, and could undermine progress made in meeting the licensing objective to protect children and young people from harm.

AFS would urge all boards to set out their approach to online retailers and deliveries within their new policies. Policies should make clear that licence holders should ensure an age verification policy is in place for delivery drivers if they believe the recipient is under 25, should recommend that delivery drivers receive training, and state that the Board may add a condition requiring the customer to sign on receipt of delivery of alcohol. This could help to address many of the concerns highlighted above. The policy could also require that orders cannot be left in nominated safe places, and that staff delivering alcohol must be trained to the same level as staff who sell or supply alcohol in licensed premises. The Boards could explore the possibility of placing conditions on online retailers to request details of sales and distribution areas, as well figures on delivery refusal rates.

¹ Alcohol Focus Scotland (2015). *Alcohol Licensing in Your Community How You Can Get Involved*. Glasgow: Alcohol Focus Scotland: <https://www.alcohol-focus-scotland.org.uk/media/133477/Community-licensing-toolkit.pdf>

² Alcohol Focus Scotland (2017). *Taking Stock: Views and experiences of alcohol licensing in Scotland in 2016/17*. Glasgow: Alcohol Focus Scotland: <http://www.alcohol-focus-scotland.org.uk/media/287043/Taking-Stock-Report.pdf>

³ Alcohol Focus Scotland (2017). *Licensing Resource Pack*. Glasgow: Alcohol Focus Scotland: <http://www.alcohol-focus-scotland.org.uk/media/291077/afs-licensing-resource-pack.pdf>

⁴ Giles, L., & Robinson, M. (2017). *Monitoring and Evaluating Scotland's Alcohol Strategy: Monitoring Report 2017*. Edinburgh: NHS Health Scotland

⁵ Nakamura, R., Pechey, R., Suhrcke, M., Jebb S.A., & Marteau, T.M. (2014). Sales impact of displaying alcoholic and non-alcoholic beverages in end-of-aisle locations: An observational study. *Social Science and Medicine*, 108:68- 73. End-of-aisle display increased sales volumes in all three alcohol categories: by 23.2% for beer, 33.6% for wine, and 46.1% for spirits.

⁶ See Alcohol Focus Scotland (2017). *Licensing Resource Pack*. Glasgow: Alcohol Focus Scotland. Pages 35-27. <https://www.alcohol-focus-scotland.org.uk/media/291077/afs-licensing-resource-pack.pdf>

⁷ Alcohol Focus Scotland and the Centre for Research on Environment, Society and Health (2018). *Alcohol Outlet Availability and Harm in Scotland*. Glasgow: Alcohol Focus Scotland <https://www.alcohol-focus-scotland.org.uk/media/310762/alcohol-outlet-availability-and-harm-in-scotland.pdf>

⁸ Alcohol Focus Scotland and the Centre for Research on Environment, Society and Health (2018). *Alcohol Outlet Availability and Harm in Aberdeenshire*. Glasgow: Alcohol Focus Scotland

⁹ Shortt, N.K., Rind, E., Pearce, J., Mitchell, R. & Curtis, S. (2018). Alcohol Risk Environments, Vulnerability, and Social Inequalities in Alcohol Consumption. *Annals of the American Association of Geographers*. DOI: 10.1080/24694452.2018.1431105

<https://www.tandfonline.com/doi/abs/10.1080/24694452.2018.1431105?journalCode=raag21>

¹⁰ Sanchez-Ramirez, D.C. & Voaklander, D. (2018). The impact of policies regulating alcohol trading hours and days on specific alcohol-related harms: a systematic review. *Injury Prevention*, 24: 94-100.