



Proposed Local Approved Products Policy

Submissions

I am submitting feedback as;

An individual

First Name:

BRENDON

Last Name:

CAMERON

Proposal to have a policy

1a. The Council should have a policy that defines the locations where retail premises can sell psychoactive products.

I agree, but I don't agree with some of the provisions in the draft policy.

1b. Comments

The proposed policy appears to try and block the future sale by almost all means possible. It fails to recognise the fact that the far greater majority of previous 'users' never caused a problem, nor ever had a problem with the use of the product - all users have been stereotyped as people with a problem? What is also being ignored by the body is the fact the product will not return in the same form, or anywhere near the same potency. The product that will return has to meet very strict guidelines set by the Ministry of Health, and will be a 'far safer' option to the consumer than the only one current psychoactive product on the regulated market, Alcohol.

Why is the council and the ill-informed community trying so hard to block something that is going to be regulated as SAFE. Alcohol would never meet the standards being set, so why do we not want to offer an individual a 'safer' option to unwind on???

Proposed policy provisions

2a. Retail premises selling psychoactive products are ONLY permitted within the Queenstown Town Central Zone.

I agree with what is proposed.

2b. Comments

It is best suited to be made available in the most public arena. The CBD is a well controlled zone that is best suited to manage and monitor the sale - it is a false theory as written in the proposed policy that the product is most likely consumed within the vicinity of the purchase, the far greater majority would choose to consume in their private residence.

A by-law should be written to outlaw the consumption of the product in any public place.

3a. Retailers of psychoactive products cannot be located close to identified "sensitive sites" which include schools, kindergartens, early childhood centres and tertiary education institutions; playgrounds, parks and reserves.

See a full list of sensitive sites on page 5 (Schedule 2) of the policy.

I disagree, as the list is too broad.

3b. Comments

The proposed policy broadly looks like a group of people sat around and contemplated how can we outright block the sale of any new 'safe' product.

To state 30m from a Licensed Premise clearly eliminates almost all retail premises. What is the fear, somebody has a lovely dinner out and when they come out of the restaurant, they should not have the choice in front of them to consume more ill-effecting alcohol or the lesser effecting safe psychoactive product?

Bus stops, all parks etc.?? But it is ok to open an off-premise liquor outlet near these - again I ask why are we trying to discourage so much, which is going to be proven to be a far safer option to the elephant in the room alcohol.

Street frontage retail only? The current only ever licensed retailer, Brew-Worx, has the best suited non-offensive site in town. Easy to monitor foot traffic in and out/through, and doesn't put it in the face of everybody...it is probably far better suited to actually not be street frontage to limit exposure.

4. Please select the statement that applies to you for each question.

4a. Must be located directly on the street frontage in any approved location i.e. does not include pedestrian only locations/thoroughfares.

I disagree with what is proposed.

4b. Must not be within 50 metres of another retail premises from which approved products are sold.

I agree with having a buffer, but I suggest a different distance.

4c. Must not be within 200 metres of an education facility e.g. school, childcare facility.

I agree with what is proposed.

4d. Must not be within 30 metres of a licensed premises.

I disagree and suggest a different way of protecting people.

4e. Must not be within 25 meters of all other sensitive sites in Schedule 2.

I agree with having a buffer, but I suggest a different distance.

4f. Must be within 1km of a 24/7 Police station.

I disagree with what is proposed.

4f. Must be with 20km of a Hospital with Emergency Department.

I disagree and suggest a different way of protecting people.

4g. Must be within 1km of a Medical Centre and Support Centres.

I disagree with what is proposed.

4h. Comments

Please give feedback on any of these proposed items below.

4a. As previously noted in regards to street frontage it is better suited not to be in people's face.

4b. Extend distance between operators to 100m to ensure no grouping of stores.

4c. A good clear distance from youth and children's exposure is applauded.

4d. This should be limited to off-premises only given the saturation of on-license premises.

4e. Why is a bus stop, a public toilet, any accommodation or a pharmacy considered sensitive?

4f. The Police's major problem is alcohol. During the past 8 years whilst synthetic cannabis was being sold in Queenstown, mostly unregulated, the number of 'incidents' Police were involved in relation to this product could annually be counted on one hand. With the product coming back being 'far safer' I do not understand this concern of having to be near a Police Station.

4f. (2) Again once this product is proven safe, the minimal percentage of people, the number of people that may require medical attention, will be far less than those who currently have an allergic reaction to something.

4g. Same feedback as for Emergency Department.

5. If you have any other comments you wish to include with your submission, please enter them in the box below.

It is my concern that the council and the general community are ignorant of the fact, that the government in respect are trying to bring to the regulated market a safe product for consumption - in part to give the consumer a safer option to alcohol. All we are doing by blocking 'safe products' is encouraging the use of a proven 'dangerous' product, alcohol.

Forward thinking if NZ ends up following suit with the USA and regulates cannabis, which would fall under the psychoactive substances act, the 'green dollar' would be huge for NZ tourism. The current proposed policy in general blocks retail almost outright and would be detrimental to Queenstown in this respect.

Finally in reiteration it needs to be clearly recognised that the product that will return to market, will have to be proven SAFE. What is wrong with offering consumers a 'far safer' option to alcohol...or are we happy with alcohol as the only psychoactive product available for evermore; the tide is turning.

Please select the statement that applies to you.

I DO wish to be heard in support of my submission.

I am submitting feedback as;

An individual

First Name:

Andrew

Last Name:

Clark

Proposal to have a policy

1a. The Council should have a policy that defines the locations where retail premises can sell psychoactive products.

I agree that the Council should have a policy that defines locations where retail premises can sell psychoactive products.

1b. Comments

I like this policy as it looks like it is giving permission when in fact it is not. Under (vii) schedule 1 "must be within 20km of a hospital with an emergency department. Whilst Lakes District Hospital may deal with some emergencies, at the public consultation over the hospitals future the panel were at pains to explain to me that they could not understand why people keep presenting themselves at the hospital without going to a GP first as the hospital is neither equipped nor staffed to have an emergency department. Hence if this is the case no outlet will be able open until the hospital board opens an emergency department.

Proposed policy provisions

2a. Retail premises selling psychoactive products are ONLY permitted within the Queenstown Town Central Zone.

I neither agree nor disagree.

2b. Comments

If someone wishes to sell them in a remote part of the district (eg Skippers) I have no problem as they will be

Far from places to cause a problem. Frankton has enough shopping centres to be suitable as well.

3a. Retailers of psychoactive products cannot be located close to identified "sensitive sites" which include schools, kindergartens, early childhood centres and tertiary education institutions; playgrounds, parks and reserves.

See a full list of sensitive sites on page 5 (Schedule 2) of the policy.

I agree with what is proposed.

3b. Comments

(No response)

4. Please select the statement that applies to you for each question.

4a. Must be located directly on the street frontage in any approved location i.e. does not include pedestrian only locations/thoroughfares.

I agree with what is proposed.

4b. Must not be within 50 metres of another retail premises from which approved products are sold.

I agree with what is proposed.

4c. Must not be within 200 metres of an education facility e.g. school, childcare facility.

I agree with what is proposed.

4d. Must not be within 30 metres of a licensed premises.

I agree with having a buffer, but I suggest a different distance.

4e. Must not be within 25 meters of all other sensitive sites in Schedule 2.

I agree with having a buffer, but I suggest a different distance.

4f. Must be within 1km of a 24/7 Police station.

I agree with what is proposed.

4f. Must be with 20km of a Hospital with Emergency Department.

I agree with what is proposed.

4g. Must be within 1km of a Medical Centre and Support Centres.

I agree with what is proposed.

4h. Comments

Please give feedback on any of these proposed items below.

The Police Station here does not always have people there to respond as one often has to use the outside phone to southern headquarters outside hours

5. If you have any other comments you wish to include with your submission, please enter them in the box below.

Some great ideas here. If we do not sell them here until health and enforcement resources are increased(so the sites can comply with the rules) people requiring psycho active substances will have to bring them in from outside the area to satisfy their needs

Please select the statement that applies to you.

I DO NOT wish to be heard in support of my submission.

I am submitting feedback as;

An organisation

Name of Organisation:

Wanaka Alcohol Group

Proposal to have a policy

1a. The Council should have a policy that defines the locations where retail premises can sell psychoactive products.

I agree that the Council should have a policy that defines locations where retail premises can sell psychoactive products.

1b. Comments

The Wanaka Alcohol Group (WAG) includes representatives from a wide range of community groups such as Mount Aspiring College, Community Networks Wanaka, Parenting for Life, Friends of MAC, Kahu Youth plus others.

We offer our full support to the council for proposing a LAPP. Feedback from the schools, agencies and community groups represented on WAG has consistently revealed a desire to minimise the exposure to these "legal highs", particularly on behalf of the vulnerable members of our community.

A LAPP represents the best option available to minimise potential harm of these products. The act of establishing a LAPP signals that the council is listening to its constituents who are concerned about "legal highs", and taking action where it can.

Proposed policy provisions

2a. Retail premises selling psychoactive products are ONLY permitted within the Queenstown Town Central Zone.

I agree with what is proposed.

2b. Comments

(No response)

3a. Retailers of psychoactive products cannot be located close to identified "sensitive sites" which include schools, kindergartens, early childhood centres and tertiary education institutions; playgrounds, parks and reserves.

See a full list of sensitive sites on page 5 (Schedule 2) of the policy.

I agree with what is proposed.

3b. Comments

(No response)

4. Please select the statement that applies to you for each question.

4a. Must be located directly on the street frontage in any approved location i.e. does not include pedestrian only locations/thoroughfares.

I agree with what is proposed.

4b. Must not be within 50 metres of another retail premises from which approved products are sold.

I agree with what is proposed.

4c. Must not be within 200 metres of an education facility e.g. school, childcare facility.

I agree with what is proposed.

4d. Must not be within 30 metres of a licensed premises.

I agree with what is proposed.

4e. Must not be within 25 meters of all other sensitive sites in Schedule 2.

I agree with what is proposed.

4f. Must be within 1km of a 24/7 Police station.

I agree with what is proposed.

4f. Must be with 20km of a Hospital with Emergency Department.

I agree with what is proposed.

4g. Must be within 1km of a Medical Centre and Support Centres.

I agree with what is proposed.

4h. Comments

Please give feedback on any of these proposed items below.

Sensitive sights may also include organisations that provide social and health services to the vulnerable members of our community.

5. If you have any other comments you wish to include with your submission, please enter them in the box below.

(No response)

Please select the statement that applies to you.

I DO wish to be heard in support of my submission.

I am submitting feedback as;

An organisation

Name of Organisation:

Adventure Development Ltd

First Name:

Colin

Last Name:

Goldthorpe

Proposal to have a policy**1a. The Council should have a policy that defines the locations where retail premises can sell psychoactive products.**

I agree that the Council should have a policy that defines locations where retail premises can sell psychoactive products.

1b. Comments

Adventure Development Ltd is an NGO that provides services to young people who have alcohol and/or other drug issues and/or mental health issues. Our staff are registered psychologists, counsellors, social workers, occupational therapists and aod workers and work in Southland, Otago and Sth Canterbury. Prior to the ban on psychoactives we were experiencing high rates of referrals from young people and their families experiencing high levels of distress caused by these substances. For some the damage to their mental health, physical health and family relationships was significant and in some cases permanent. The irony was that the illegal options were producing less acute difficulties for our clients than the "legal" options which most of our clients assumed were safe. The level of offending associated with their use was also very high. As an organisation we support the continuing total ban on these substances as as soon as they were made illegal the referrals and reported damage dropped almost to zero. We hope that the QLDC will lobby for a continuation of the ban however if this is not possible we consider the Local Approved Products Policy does as much as it can to reduce the damage while remaining within the statutes.

Proposed policy provisions

2a. Retail premises selling psychoactive products are ONLY permitted within the Queenstown Town Central Zone.

I agree with what is proposed.

2b. Comments

(No response)

3a. Retailers of psychoactive products cannot be located close to identified "sensitive sites" which include schools, kindergartens, early childhood centres and tertiary education institutions; playgrounds, parks and reserves.

See a full list of sensitive sites on page 5 (Schedule 2) of the policy.

I agree with what is proposed.

3b. Comments

(No response)

4. Please select the statement that applies to you for each question.

4a. Must be located directly on the street frontage in any approved location i.e. does not include pedestrian only locations/thoroughfares.

I agree with what is proposed.

4b. Must not be within 50 metres of another retail premises from which approved products are sold.

I agree with what is proposed.

4c. Must not be within 200 metres of an education facility e.g. school, childcare facility.

I agree with what is proposed.

4d. Must not be within 30 metres of a licensed premises.

I agree with what is proposed.

4e. Must not be within 25 meters of all other sensitive sites in Schedule 2.

I agree with having a buffer, but I suggest a different distance.

4f. Must be within 1km of a 24/7 Police station.

I agree with what is proposed.

4f. Must be with 20km of a Hospital with Emergency Department.

I agree with what is proposed.

4g. Must be within 1km of a Medical Centre and Support Centres.

I agree with what is proposed.

4h. Comments

Please give feedback on any of these proposed items below.

In relation to 4e we believe that it is critical to remove such premises from any locality frequented by children and young people by 200m and believe that it should be illegal to be used in public places with the council able to enforce this with a fine.

5. If you have any other comments you wish to include with your submission, please enter them in the box below.

(No response)

Please select the statement that applies to you.

I DO wish to be heard in support of my submission.

I am submitting feedback as;

An organisation

Name of Organisation:

Wakatipu High School

Proposal to have a policy

1a. The Council should have a policy that defines the locations where retail premises can sell psychoactive products.

I agree, but I don't agree with some of the provisions in the draft policy.

1b. Comments

Our preference would be that the Council bans them completely.

However, if the Council must have a policy re their sale, we have concerns that 200m is not far enough from educational facilities.

Proposed policy provisions

2a. Retail premises selling psychoactive products are ONLY permitted within the Queenstown Town Central Zone.

Other (please specify in comments)

2b. Comments

Please see our comment in 1b, re our preference that they are not permitted to be sold at all, and if they must be here, further from educational facilities.

3a. Retailers of psychoactive products cannot be located close to identified "sensitive sites" which include schools, kindergartens, early childhood centres and tertiary education institutions; playgrounds, parks and reserves.

See a full list of sensitive sites on page 5 (Schedule 2) of the policy.

I agree, as it will help reduce young and vulnerable people's exposure.

3b. Comments

We agree with the intention of helping to reduce harm to young people but we believe it should be further than 200m away.

4. Please select the statement that applies to you for each question.

4a. Must be located directly on the street frontage in any approved location i.e. does not include pedestrian only locations/thoroughfares.

(No response)

4b. Must not be within 50 metres of another retail premises from which approved products are sold.

(No response)

4c. Must not be within 200 metres of an education facility e.g. school, childcare facility.

I agree with having a buffer, but I suggest a different distance.

4d. Must not be within 30 metres of a licensed premises.

(No response)

4e. Must not be within 25 meters of all other sensitive sites in Schedule 2.

(No response)

4f. Must be within 1km of a 24/7 Police station.

(No response)

4f. Must be with 20km of a Hospital with Emergency Department.

(No response)

4g. Must be within 1km of a Medical Centre and Support Centres.

(No response)

4h. Comments

Please give feedback on any of these proposed items below.

We believe it should be more than 200m from educational facilities.

5. If you have any other comments you wish to include with your submission, please enter them in the box below.

We wish to support any measures that reduce the availability and visibility of psychoactive substances in the Queenstown Lakes District.

We wish to make two points on psychoactive substances and their availability :

1. Young people have expressed the idea to us that psychoactive substances can't be too bad or they wouldn't be legal.
2. Young people have told us that they have chosen to use psychoactive substances because they weren't illegal (compared to marijuana which is illegal).

Please select the statement that applies to you.

I DO NOT wish to be heard in support of my submission.

I am submitting feedback as;

An organisation

Name of Organisation:

Supporting Families Wakatipu which is managed by Supporting Families Southland

Proposal to have a policy

1a. The Council should have a policy that defines the locations where retail premises can sell psychoactive products.

I agree that the Council should have a policy that defines locations where retail premises can sell psychoactive products.

1b. Comments

Our recommendation would be that these products are banned in Queenstown by QLDC as other councils have done in New Zealand. In the absence of that decision we recommend the following-

These items are highly addictive and dangerous to humans and animals, the sale and distribution of them (if allowed to occur at all) ought to be done in a measured and controlled way. The addictive nature of these products means that consumption quickly increases, consumers can be spending \$500 per week or more on these products. As their need for the product increases their mental and cognitive function decreases. Their ability to work and pay for the products becomes an issue and they become a financial burden on their family and on the state. This means that we may have clusters of individuals who will be gathering in the retail shops or outside of them that can be in varying stages of altered psychological states. They may also be willing to go to extreme lengths to access money to purchase these products. Families we support have been threatened, intimidated and coerced into supporting this addiction. Theft of items to raise money to pay for the drugs has also been an issue in Queenstown. By defining the location of the sale of these products and ensuring that the retail outlets are in well lit, public places- ideally with street cameras will mean that it will be easier for the police to manage the negative, anti social and dangerous behaviour that goes hand in hand with these products.

Proposed policy provisions

2a. Retail premises selling psychoactive products are ONLY permitted within the Queenstown Town Central Zone.

I agree with what is proposed.

2b. Comments

By allowing the sale of these products in our community we have a responsibility to reduce the risk of harm as much as we possibly can, safety for the consumer and members of the community must be the priority.

The products themselves have many side effects, reduced cognitive function- which will effect the consumers ability to drive and operate machinery. Seizures, heart problems, paranoia, loosing touch with reality and aggression have all been issue for consumer in our community.

Close proximity to the police and medical services is vital. It would be irresponsible to have a retail outlet 40 minutes from essential services and would put the consumer and other members of the community at greater risk. When these products were being sold in Queenstown the hospital had high numbers of consumers presenting as emergency patients. Ambulance officers in Queenstown have also been harmed by consumers needing medical attention but also being violent.

Keeping the retail outlets in the CBD will mean that ambulance officers will have police close at hand for protection if required.

3a. Retailers of psychoactive products cannot be located close to identified "sensitive sites" which include schools, kindergartens, early childhood centres and tertiary education institutions; playgrounds, parks and reserves.

See a full list of sensitive sites on page 5 (Schedule 2) of the policy.

I agree, as it will help reduce young and vulnerable people's exposure.

3b. Comments

These products are appealing to many young people, when they were 'legal' there were many young adults who felt that these have been given the governments stamp of approval. They told our agency that they would not have tried other illegal drugs but that they gave these a try because they were legal and easily accessible in retail shops in town. Young people and other groups of vulnerable people are more likely to impulse buy these products, to reduce the risk of exposure and harm to these two groups we recommend that sensitive sites restrictions be implemented. This would include, community agencies such as Jigsaw, The Salvation Army, Victim Support etc... It would be unhelpful if a consumer or family member was working with an agency on their addiction

issues if the retail outlet was right next door.

4. Please select the statement that applies to you for each question.

4a. Must be located directly on the street frontage in any approved location i.e. does not include pedestrian only locations/thoroughfares.

I agree with what is proposed.

4b. Must not be within 50 metres of another retail premises from which approved products are sold.

I agree with what is proposed.

4c. Must not be within 200 metres of an education facility e.g. school, childcare facility.

I agree with what is proposed.

4d. Must not be within 30 metres of a licensed premises.

I agree with what is proposed.

4e. Must not be within 25 meters of all other sensitive sites in Schedule 2.

I agree with what is proposed.

4f. Must be within 1km of a 24/7 Police station.

I agree with what is proposed.

4f. Must be with 20km of a Hospital with Emergency Department.

I agree with what is proposed.

4g. Must be within 1km of a Medical Centre and Support Centres.

I agree with what is proposed.

4h. Comments

Please give feedback on any of these proposed items below.

We would also like the retail outlet to be situated in a place where there are police operated cameras in place.

5. If you have any other comments you wish to include with your submission, please enter them in the box below.

Supporting Families Wakatipu

P.O.Box 2510

Wakatipu

0800 72 44 96

[REDACTED]

30th April 2015

Lee Webster

QLDC

10 Gorge Road,

Queenstown

Re: Psychoactive Substances QLDC proposed LAPP

Below is a copy of the letter that I wrote to council in July last year, as you will see we had a quite a range of issues at that time that were caused by psychoactive substances, since these products were removed from retail stores in NZ we have had no families present to our agency with these issue and importantly the issues that these families were having in the most part have been resolved.(There are some residual medical issues) All of the people are back in full time work and have re connected with their families and friendship groups. This is not to say all wounds have healed- some lost pets that they loved, others physically hurt family members or now have criminal records for theft or violent crimes. These wounds will take some time to heal, but the social issues we were seeing as a result of these products, crime, job losses, intimidation, bullying, aggression etc... these issues are resolved.

It is our agencies recommendation that QLDC ban these products from being sold in Queenstown, we understand that this could put council at risk of future legal recourse from retails but believe that if many councils across New Zealand were to do this the risk would be very low indeed of legal action from the retails of these products. In the absence of that decision we strongly recommend that you implement this proposed LAPP.

Jo Moore

Supporting Families Wakatipu

Lee Webster

QLDC

10 Gorge Road,

Queenstown

Re. Feedback: Psychoactive Substances QLDC Questions

Dear Lee,

This letter is in response to your request for feedback on the sale of psychoactive substances in this area. Supporting Families Wakatipu falls under the governance of Supporting Families Southland which provides support services to family and friends of people that experience mental health, drug / alcohol issues. We are funded by the District Health Board and advocating for families is one of the services that we provide. Our staff have seen first-hand the effects on local Families that have been adversely affected by their loved ones consuming psychoactive substances. We ask that QLDC ban these products completely from the district due to the negative impact these products have had to our community. We have included our report of the effects on Wakatipu Families.

This letter is in response to your request for submission on the sale of psychoactive substances in this area. Supporting Families Wakatipu falls under the governance of Supporting Families Southland which provides support services to family and friends of people that experience mental health, drug / alcohol issues. We are funded by the District Health Board and advocating for families is one of the services that we provide. Our staff have seen first-hand the effects on local Families that have been adversely affected by their loved ones consuming psychoactive substances. We ask that QLDC ban these products completely from the district due to the negative impact these products have had to our community. We have included our report of the effects on Wakatipu Families.

Wakatipu Families- Effects of Psychoactive Substances/ Legal Highs

Users:

- Adolescents and adults
- Different cultures
- Across all socioeconomic levels
- Students & Employed
- Parents

What drew them to using Legal High's initially?

- Previous low level Cannabis users
 - o Switching to Legal high's because they saw them as an opportunity to move away from an illegal activity.
 - o Switching as the Legal Highs are not routinely tested for in drug tests.
 - o Perception that the legal high's would be safer- being less harmful to them physically as they believed that to become legal they must have been through a rigorous testing process.
- New to drug use

- o Stated they had never tried drugs before but now that they were legal they thought they would be safe to try for fun.
- o Some tried them in groups with friends.
- o They didn't think they would be addictive.

Problems:

Dependency/ Addiction

- Users report that the products are highly addictive.
- Frequency of use and amounts used increased quickly, moving to dependency and daily use.
- Some users spending over \$700 per week at the peak of use.
- Very stressful and difficult withdrawal

Behaviour: All families noticed a change in the behaviour and personality of the user.

- Withdrawing from family life
- Difficulty communicating within the family unit
- Aggression and damage to property at home and in the community
- Threatening and or manipulating behaviour to try to obtain money from family members to purchase drugs
- Loss of interest in things that used to bring them pleasure:
 - o friendships and social activities
 - o sports
 - o work

Some Consequences for the user

- Loss of job –dependency on their parents.
- Debt with the retail shop which has allowed them to put their purchases “on tick”.
- Arrests & Convictions. Damage to property & theft resulting in being arrested, charged and convicted.
- Periodic Detention.
- Isolation & loss of self-esteem.

Impacts & Concerns for the family

- Fear for personal safety
- Fear for their son/daughter's health & safety.
- Fear for others safety- especially around the user driving a motor vehicle while under the influence of Legal Highs
- Families needing to spend time and energy to access support services to understand addiction and how to support the user to access help.
- Police visiting the house to monitor the user's compliance with court rulings around curfews etc...
- Grief for the loss of the relationship that they previously had with the user.
- Taking time off work for police related matters.

- Taking time off work to support the user with withdrawal attempts, medical care, hospital visits etc...

Health of the user:

- Headaches
- Anxiety
- Psychosis (losing touch with reality-which could be one or more of the following: hallucinations, delusions, confused and disturbed thoughts, and a lack of insight and self-awareness.)
- Seizures
- Difficulty eating
- Frequent coughing, expelling black bile
- Memory problems, confusion & disorientation
- Hospitalisation
- Developed Long term health issues after hospitalisation.

Health of the family members:

- Stress
- Anxiety

Social issues

- Young people that had never been in trouble before now committing burglary & theft in an attempt to obtain money to purchase legal highs
- Safety of Emergency Services-Being aggressive with ambulance officers.
- Ambulance officers needing to call police in when dealing with aggressive users in need of medical care.
- Taking up time and resources of doctors and nurses in the hospital A & E.
- Police time and resources under additional pressure.
- Risk of harm to others: Users operating machinery/driving while under the influence.

Other

- Death of an animal (not by consumption of the product)
- Trauma and hospitalisation to animals that have consumed the products

In a situation where QLDC finds itself unable to ban these products we ask that the following be implemented.

We would like QLDC to use all options available to it to reduce the possibility of harm to our

community such as the following three options:

1. LAPP
2. Bye Law
3. District Plan

Sensitive Sites- 500 metres from sensitive sites

“Scientists have learnt more about the brain in the last ten years than ever before” Nathan Mikaere Wallis from The Brainwave Trust, N.Z. talked to Wakatipu High School parents and teachers earlier this year on the topic ‘Understanding how alcohol and drugs affect the adolescent brain’. He highlighted some important factors that make young people more easily influenced and outlined what makes them a vulnerable group. Important developmental stages of the adolescent brain make them susceptible to risk taking behaviour and suggestion says Wallis. The National Institute of Mental Health discuss recent discoveries of brain development in their paper ‘The Teen Brain: Still under Construction’

“The brain matures somewhere between 21 and 25 years. From around 14 to 21 adolescents will assess risk with a different part of the brain than younger and older people. Scientists believe this is what makes teenagers more vulnerable.”

“The more we learn, the better we may be able to understand the abilities and vulnerabilities of teens, and the significance of this stage for life-long mental health.” And they go on to say that “Adolescents and adults seem to engage different parts of the brain to different extents during tests requiring calculation and impulse control” (National Institute of Mental Health, USA, (n.d.)

Please select the statement that applies to you.

I DO wish to be heard in support of my submission.

From: Fee Stephenson [REDACTED]

I feel that the amount of clients coming through affected by psycho active substances is now very small, due to it not being readily available. I would support the sustained ban and anything that continues to keep the youth of the area safe from these substances,

Thanks

Fiona Stephenson
Jigsaw

Name: Sarah Fitton

Hi, I just read the article in the Mirror re Legal High. I think that Brew Worx owner is mistaken and how does he know people aren't abusing it..that is about money in his pocket. Legal highs in any shape or form should NOT be sold. As a nurse I am expressing my concerns because I know of teenagers dying from it. The long term effects are horrific and they should remain banned. Thanks

Public Health South

Dunedin: Private Bag 1921, Dunedin 9054
Ph: 03 476 9800 Fax: 03 476 9858

Invercargill: PO Box 1601, Invercargill 9840
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**SUBMISSION ON THE PROPOSED LOCAL APPROVED PRODUCTS POLICY 2015
(PSYCHOACTIVE SUBSTANCES)**

To: District Secretary
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Details of Submitter: The Southern District Health Board

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Introduction

Southern District Health Board (Southern DHB) presents this submission through its Public Health Service. This Service is the principal source of expert advice within Southern DHB regarding matters concerning Public Health. Southern DHB has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. Additionally there is a responsibility to promote the reduction of adverse social and environmental effects on the health of people and communities. With 4,250 staff, we are located in the lower South Island (South of the Waitaki River) and deliver health services to a population of 306,500.

Public health services are offered to populations rather than individuals and are considered a "public good". They fall into two broad categories – health protection and health promotion. They aim to create or advocate for healthy social, physical and cultural environments.

This submission comments on the Proposed Local Approved Products Policy 2015 (Psychoactive Substances) for the Queenstown Lakes District Council (QLDC), with further background reading supplied as an appendix.

General Comments

The Southern DHB is supportive of the proposed Local Approved Products Policy (LAPP) and believes the policy will work towards reducing harm from psychoactive substance use in the Queenstown and Lakes District, without unduly frustrating the purpose and intent of the Act.

We are pleased to see the location of retail premises from which approved products may be sold is restricted by this policy to an approved location as identified in Schedule 1. We also commend the QLDC for proposing a minimum distance of 200 metres between retailers of psychoactive substances and education facilities.

The Southern DHB notes the proposed minimum distances between retailers and other premises from which approved products are sold, as well as the distances between retailers and licensed premises and all other sensitive sites (as listed in Schedule 2) are liberal. These distances are low by comparative standards across the country but the Southern DHB acknowledges the difficulties faced by the QLDC because of the features of the inner Queenstown zone.

Feedback on Proposed Policies

Section 5A: The location of retail premises from which approved products may be sold is restricted by this policy to an approved location identified in Schedule 1:

The Southern DHB supports the proposal to restrict retailers of psychoactive substances to within the area identified in Schedule 1. Retailers will be located within a well-defined area and be visible making them easier to monitor and therefore discourage both sales to underage customers and antisocial behaviour that could occur in more isolated areas.

Recommendation for Section 5A

- The Southern DHB recommends Section 5A be included in the final LAPP without revision.

Section 5B: Premises within the approved locations identified in Schedule 1:

(i) must be located directly on the street frontage in any approved location i.e. does not include pedestrian only locations/thoroughfares

The Southern DHB agrees that having premises located directly on the street frontage is a sensible option, and we reiterate our previous comments regarding antisocial behaviour and sales to underage customers.

Recommendation for Section 5B (i)

- The Southern DHB recommends Section 5B (i) be included in the final LAPP without revision.

ii) must not be within 50 metres of another retail premises from which approved products are sold

The Southern DHB would prefer more than 50 metres as a minimum distance between retailers of psychoactive products to avoid “clustering” of premises, but understands that the QLDC have considered this carefully due to the potential of the LAPP becoming void if too restrictive. For comparison, the minimum distances between retailers stipulated in LAPPs in other regions are 100 metres in the Gore District Council, Invercargill City Council and Southland District Council in their combined policy¹, 150 metres in the Tasman District², and 300 metres in Napier³.

¹ Gore District Council, Invercargill City Council, Southland District Council (2014) *Combined Local Approved Products Policy: Psychoactive Substances 2014*. <http://www.southlanddc.govt.nz/assets/Draft-Local-Approved-Products-Policy.pdf>.

² Tasman District Council (2013) *Local Approved Psychoactive Products Policy*. <http://www.tasman.govt.nz/policy/policies/local-approved-psychoactive-products-policy/>

³ Napier City Council (2013) *Policy on Location of Approved Psychoactive Products Sales Points*. <http://www.napier.govt.nz/assets/Document-Library/Policies/psychoactive-substances-policy-2013.pdf>

Recommendation for Section 5B (ii)

- The Southern DHB recommends Section 5B (ii) be included in the final LAPP with the consideration that the policy is reviewed at the anniversary date.

iii) must not be within 200 metres of an education facility e.g. school, childcare facility

The Southern DHB supports the establishment of a minimum distance of 200 metres between a retailer of psychoactive products and an education facility.

Recommendation for Section 5B (iii)

- The Southern DHB recommends Section 5B (iii) be included in the final LAPP without revision.

iv) must not be within 30 metres of a licensed premises

The Southern DHB is concerned that having a minimum distance of 30 metres between a retailer selling approved products and a licensed premises will not be restrictive enough given the potential for alcohol (a psychotropic drug) induced issues in the area. However, the Southern DHB recognises this may be difficult due to the quantity and proximity of licensed premises already in operation in the area as defined in Schedule 2, and the QLDC cannot unduly frustrate the purpose and intent of the Act.

Recommendation for Section 5B (iv)

- The Southern DHB recommends increasing the minimum distance between retailers of psychoactive substances from which approved products are sold and licensed premises if at all possible.

v) must not be within 25 metres of all other sensitive sites in Schedule 2

The Southern DHB supports having a minimum distance between a psychoactive substances retailer and sensitive sites to reduce exposure of these products to more vulnerable groups in society such as children, youth and people with mental health issues. The Southern DHB realises that the minimum distance of 25 metres between sensitive sites and a retailer of psychoactive substances is due to there being many bus stops in the area which are largely frequented by young people.

Recommendation for Section 5B (v)

- The Southern DHB recommends Section 5B (v) be included in the final LAPP without revision.

(vi) must be within 1km of a 24/7 Police station

The Southern DHB supports having premises that are within 1km of a 24/7 Police Station as this will ensure ease of monitoring and close proximity if there are any concerns with behaviour.

Recommendation for Section 5B (vi)

- The Southern DHB recommends Section 5B (vi) be included in the final LAPP without revision.

(vii) must be within 20km of a Hospital with Emergency Department

The Southern DHB supports premises that are located within 20km of a Hospital with an Emergency Department.

Recommendation for Section 5B (vii)

- The Southern DHB recommends Section 5B (vii) be included in the final LAPP without revision.

Summary

Local councils have a critical role to play in creating environments that promote and support community well-being, and we wish to highlight the value of working with local government to minimise the negative impact of various activities on population health. We commend the QLDC in their decision to establish a LAPP, which is allowed but not required under the *Psychoactive Substances Act 2013* (the Act).

In our opinion the proposed policy does not limit the purpose and intent of the Act and will help reduce harm from psychoactive products use in the area. The LAPP will also work toward preventing normalisation of these substances.

The Southern DHB considers that larger minimum distances between retailers and licensed premises, and all other sensitive sites, may help reduce exposure to vulnerable people in the community. If there is any opportunity to increase the minimum distances between retailers and licensed premises as well all other sensitive sites, the Southern DHB would be supportive of this.

The Southern DHB wishes to be heard to present the content of this submission.

Yours sincerely,



Joanne Lee
Health Promotion Advisor

Appendix

New Zealand data shows that youth under the age of 25 are the highest users of psychoactive substances and are the group most at risk from harm.⁴ According to the 2011/12 and 2012/13 New Zealand Health Surveys, males aged 15-24 years in Otago and Southland were almost twice as likely to have used party pills in the previous 12 months than their counterparts in New Zealand overall (6.5% vs. 3.6%).⁵

Limiting retailers to commercial zones will ensure that for the majority of people in the district, shops will not be immediately accessible near their place of residence. There is a lack of research specifically looking at harm related to the locations of retailers of psychoactive products. However, New Zealand research into other potentially harmful behaviours shows higher levels of harm in neighbourhoods where these activities are readily available. For example, living within 700 metres of an electronic gaming machine (EGM) is associated with a 2.7 times increased risk of problem gambling compared with living at least 3 kilometres from a venue with EGMs,⁶ and for every additional off-licence within a kilometre of home, the odds of binge drinking increase by 4%.⁷ Limiting access to psychoactive products in residential areas will similarly contribute to harm reduction.

An average person can walk 100 metres in less than two minutes and a separation distance of 50 metres may not be adequate to discourage competition between adjacent retailers. At a distance of 50 metres, most people with normal vision are able to make out detail on retail signage. Research into the relationship between retailer density and psychoactive substance-related harm is scarce, but Australian research has shown that reduced alcohol outlet density discourages selling at lower prices and selling to under-age customers.⁸

New Zealand research has shown that the legal status of approved products conveys a perception that they are safe but of low strength, resulting in many users taking higher than the recommended doses, or combining their use with alcohol.^{9,10,11}

In 2012 the highest prevalence of alcohol-related presentations in the Southern district was recorded at the Lakes District Hospital.¹² If strict restrictions are put in place to reduce the number of licensed premises within the town centre zone to lower the risk of harm in the community due to alcohol, then it would be sensible to consider maximising the distance between a psychoactive substances retailer and licensed premises.

⁴ Ministry of Health (2010) *Drug Use in New Zealand: Key Results of the 2008/08 New Zealand Alcohol and Drug Use Survey*. Wellington: Ministry of Health. <http://www.health.govt.nz/system/files/documents/publications/drug-use-in-nz-v2-jan2010.pdf>.

⁵ Unpublished data, Ministry of Health.

⁶ Pearce, J., Mason, K., Hiscock, R. and Day P. (2008) A national study of neighbourhood access to gambling opportunities and individual gambling behaviour. *Journal of Epidemiology and Community Health* 62: 862-868.

⁷ Connor, J., Kypri, K., Bell, M. and Cousins, K. (2011) Alcohol outlet density, levels of drinking and alcohol-related harm in New Zealand: a national study. *Journal of Epidemiology & Community Health* 65: 841-846.

⁸ Livingston, M., Chikritzhs, T. and Room, R. (2007) Changing the density of alcohol outlets to reduce alcohol-related problems. *Drug and Alcohol Review* 26: 557-566.

⁹ Sheridan, J. and Butler, R. (2010) "They're legal so they're safe, right?" What did the legal status of BZP-party pills mean to young people in New Zealand? *International Journal of Drug Policy* 21: 77-81.

¹⁰ Butler, R. and Sheridan, J. (2007) Highs and lows: patterns of use, positive and negative effects of benzylpiperazine-containing party pills (BZP-party pills) amongst young people in New Zealand. *Harm Reduction Journal* 4:18.

¹¹ Ministry of Health (2010) *Drug Use in New Zealand: Key Results of the 2008/08 New Zealand Alcohol and Drug Use Survey*. Wellington: Ministry of Health.

¹² Public Health South (2013) *The Impact of Alcohol on the Health of Southern Communities: A Report to Inform the Development of Local Alcohol Policies by Southern District Councils*.