1. Background and Purpose of Document

1.1 This document forms the public health LBBD’s response to the premise licence review sought with regards to the sale of alcohol to a young volunteer under the age of 18 and the seizure of non-complainant, duty evaded tobacco products found at Oltenia, 135 Broad Street, Dagenham RM10 9HP during 2017.

2. Impact of Under-18 drinking

2.1 According to Drinkaware¹ a number of risks are associated with under-age drinking. These include alcohol poisoning, increased risk of accident and injury, exacerbated by a young person’s typically lower body weight and limited ability to metabolise alcohol, negative impacts on brain development and education and liver damage. Excessive drinking by young people may also be linked to the use of illicit drugs and smoking tobacco. Increased vulnerability was also found in a study where 12% of young people between the ages of 10-17 years experienced serious harm as a result of drinking such as being a victim of crime and being involved in fighting.²

¹ https://www.drinkaware.co.uk/advice/underage-drinking/know-the-risks-of-drinking-alcohol-underage/accessed on 27/12/17

2.2 Hospital admissions for alcohol-specific conditions in the under 18s is lower than the national average in Barking and Dagenham. Nevertheless, around 28 individuals under 18s were admitted to hospital during from 2013/14 – 15/16 for alcohol-specific conditions. This is concerning as Barking and Dagenham is committed to reducing the harm to young people in relation to problematic alcohol use. 

3. **Illicit Tobacco**

3.1 All tobacco smoking is harmful whether from legal or illegal sources with smoking being the leading cause of preventable death and disease in the world. Tobacco contains over 4,000 chemicals 60 of which are associated with cancer.

3.2 While smoking prevalence in the UK has reduced significantly from 26 per cent to 19 per cent over the past fifteen years the trade in illegal tobacco undermines the effectiveness of strategies to reduce smoking and thereby smoking related disease.

3.3 High duty rates reduce smoking by making tobacco less affordable for people. Cheap illegal tobacco undermines the deterrent effect of cost. Cheaper tobacco makes it easier for people trying to stop smoking relapse and may act as an encouragement to start smoking.

4. **Smoking in Barking and Dagenham**

4.1 Mortality from smoking in people over 35 years during the period 2014-16 was higher in Barking and Dagenham then elsewhere across England (364.6 per 100,000 people in Barking and Dagenham compared with 246.7 in London and 272.0 in England). The short-term health consequences for young people who smoke include respiratory and non-respiratory effects, addiction to nicotine, and the associated risk of other drug use. Long-term health consequences of youth smoking are reinforced by the fact that most young people who smoke regularly continue to smoke throughout adulthood.

4.2 Teens who smoke are three times more likely than non-smokers to use alcohol, eight times more likely to use marijuana, and 22 times more likely to use cocaine. Smoking is associated with a host of other risky behaviours, such as fighting and engaging in unprotected sex.

---

3 Joint Health and Wellbeing Strategy 2015-2018 Barking and Dagenham p.9
4 Illicit Tobacco Partnership at [http://www.illicit-tobacco.co.uk/problem/undermining-tobacco-control/](http://www.illicit-tobacco.co.uk/problem/undermining-tobacco-control/) (accessed on 03.11.17)
5 Illicit Tobacco Partnership at [http://www.illicit-tobacco.co.uk/problem/undermining-tobacco-control/](http://www.illicit-tobacco.co.uk/problem/undermining-tobacco-control/) (accessed on 03.11.17)
6 Illicit Tobacco Partnership at [http://www.illicit-tobacco.co.uk/problem/undermining-tobacco-control/](http://www.illicit-tobacco.co.uk/problem/undermining-tobacco-control/) (accessed on 03.11.17)
8 [http://www.who.int/tobacco/research/youth/health_effects/en/](http://www.who.int/tobacco/research/youth/health_effects/en/)
9 [http://www.who.int/tobacco/research/youth/health_effects/en/](http://www.who.int/tobacco/research/youth/health_effects/en/)
4.3 It is estimated that up to 27% of young people between the ages of 11-19 years in the borough smoke regularly compared with 18% nationally.\textsuperscript{10}

4.4 Environments selling cheap, illegal tobacco may sell other products illegally such as drugs and alcohol exposing children and young people to even more danger.

4.5 The Local Government Association calls on Trading standards to ‘…continue to carry out enforcement exercises that target rogue traders and help to protect the health of children and young people.’\textsuperscript{11}

5. Recommendations

5.1 The message to our residents echoed in our borough Manifesto and Health and Wellbeing Strategy and our Joint Strategic Needs Assessment is to reduce alcohol related harms for young people and for residents to quit smoking altogether. Dealing with rogue traders as firmly as possible is a critical part of ensuring residents are given the right support to maintain health. As such, it would be a matter of concern if the licence to trade was not revoked in this case.

5.2 We welcome the opportunity to comment on this application review a premise licence and suggest the licensing continue to work with public health in relation to all relevant applications, reviews, strategy and policy.

\textsuperscript{11} Chair of the LGA's safer and stronger communities board Cllr Simon Blackburn quoted https://www.localgov.co.uk/Councils-pledge-to-crack-down-on-toxic-illegal-tobacco-market/40863 (accessed on 06/11/17)