

Regulations to introduce measures to tackle drink driving in Northern Ireland

ANNEX A: Response Form

Title: Mr

Name: Eric Carlin, Director

Organisation (if applicable)* Scottish Health Action on Alcohol Problems (SHAAP)

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Date: 18th May 2016

*Organisation Details

If you are replying on behalf of an organisation, please explain who you represent and size of organisation:

Replying on behalf of Scottish Health Action on Alcohol Problems (SHAAP).

SHAAP was established by the Scottish Medical Royal Colleges and Faculties to raise awareness about alcohol-related problems. We represent the voice of the medical profession in Scotland on alcohol-related health issues.

Please note:

The Department will prepare a summary of all the responses to this consultation letter. Copies of individual responses may also be made available to anyone that requests them.

I am content for a copy of my response to be made available if requested.

Please note that if you ask for your response to be kept confidential this will only be possible if it is consistent with our obligations under the Freedom of Information Act 2000.

†please delete as appropriate

FIXED PENALTIES

Q 1 - Do you have any comments on the Department's approach to introducing fixed penalties for lower level drink driving offences?

Comment on Q 1.

We support the Department's approach to introducing fixed-penalty notices (FPN).

We would also urge caution with regards to mitigating FPNs if the driver completes an approved Course for Drink Drive Offenders (CDDO). These penalties should be used together, rather than as either one or the other, to have maximum impact. As seen in other policies around alcohol, education campaigns/programmes, such as the CDDO, to increase knowledge and shift attitudes are known to have limited impact on individual behaviour, but are important in terms of ensuring people have the information necessary to make informed choices about risk¹. The level of FPN should be the same for all infringements below 80mg/100ml.

We support the lower limit of 20mg/100ml for learner and novice drivers.

¹ NHS Health Scotland (2016) Monitoring and Evaluating Scotland's Alcohol Strategy (MESAS) Final Annual Report, March 2016, page 41

http://www.healthscotland.com/uploads/documents/26884-MESAS_Final%20annual%20report.pdf

DISQUALIFIED UNTIL TESTED

Q 2 – Do you have any comments on the Department’s approach to the restriction of the requirement to re-sit the driving test to those disqualified for 12 months or more for offences involving higher levels of alcohol?

Comment on Q 2.

No comment

HIGH RISK OFFENDERS

Q 3 - Do you agree with the Department's approach to reducing the threshold for High Risk Offenders to 125mg/100mls?

Please indicate your preference by ticking the appropriate box (✓)

Yes

Comment on Q 3.

We support the Department's approach to reducing the High Risk Offenders threshold, although we believe this is still too high, and should be reduced over time and eventually brought into line with the standard limit.

It would be helpful to have an explanation as to why a ratio of two-and-a-half times the conventional drink driving limit was chosen as appropriate for high risk offenders. No explanation is currently given for this.

CONSULTATION PROCESS

Q 4 - Do you have any comments to make on the consultation process?

Comment on Q 4.

No comment

Thank you for taking the time to complete the questionnaire.

Please return this form by 27 May 2016 to:

John Brogan
Road Safety and Vehicle Regulation Division
Department of the Environment
Clarence Court
10-18 Adelaide Street
Town Parks
Belfast
BT2 8GB

Or e-mail: drinkdrive@doeni.gov.uk