



Submission to the Office of Liquor, Gaming & Racing

RE: Review of the 10pm take-away liquor sales restriction across NSW



Prepared by Liquor Marketing Group

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About Liquor Marketing Group

Liquor Marketing Group (LMG) is one of Australia's leading alcohol marketing groups, proudly representing more than 1,400 independent operators in the off-premise market. It is the only national independent with a sole focus on the retail market.

LMG is a not-for-profit organisation, so all income is directed towards supporting its members' businesses. LMG provides independent retailers with the negotiating power, consumer brand expertise, professionalism and support to compete successfully in the off-premise retail marketplace.

LMG operates several independent retail banner groups, Bottlemart being its largest with more than 650 members, of which 208 are based in regional or rural NSW. Each hotel and bottleshop is independently owned and managed and is committed to providing the highest possible level of retail convenience and hospitality service – whether it is the ambience of the public bar, the quality and value of the food service, the level of entertainment or the wide range available in the bottleshop.

LMG's position on 10pm take-away liquor sales restriction across NSW

LMG represents 208 take-away liquor outlets in regional and rural New South Wales and recognises that bottle shops have a multi-faceted use for locals. They offer ancillary services, including late night ATM access and late night convenience shopping.

LMG members proactively engage with local authorities and in the majority have had positive engagement with liquor licensing authorities which resulted in ongoing collaborative efforts to adhere to harm minimisation measures throughout rural NSW. LMG promote training programs for members and their staff which include modules on responsible service of alcohol and harm minimisation.

It is our view that off-premise liquor retailers are already subject to stringent liquor license requirements, which are better suited to being individually applied on a needs basis rather than a blanket restrictions being imposed.

Data on Alcohol Related Violence

Since 2008, the NSW Government has responded to community concerns about alcohol-related violence by introducing a range of measures including liquor-licensing restrictions. The NSW Parliamentary Research Service suggests that at the current time "the evidence on the effectiveness of these restrictions is limited".¹

¹ L Roth and C Angus, *Liquor licensing restrictions to address alcohol-related violence in NSW: 2008 to 2014*, NSW Parliamentary Research Service 2015, eBrief 2/2015.

It is worth noting that data shows a reduction in alcohol related violence before the introduction of restrictions, supporting the idea that reductions in violence cannot be directly attributed to licencing restriction. For example, figures from NSW Bureau of Crime Statistics and Research show a 37% decrease in alcohol related non-domestic assaults between 2008 and 2013.²

Competitive Advantages for Rural Liquor Outlets

Prior to the introduction of the 10pm take-away liquor sales restriction, independent liquor retailers were able to trade beyond 10pm, which offered them a singular source of competitive advantage against larger liquor chains as they could attract late-night convenience consumers.

Meanwhile, major retail chains are able to absorb the costs of servicing rural and regional towns with their supply channels, by providing pricings benefits which are difficult for independent operators to compete with. As a result of the 10pm trading hour restrictions, a major factor in facilitating independent, regional businesses competing against major national chains through convenience sales no longer exists. Therefore, given a lack of evidence to show a meaningful community benefit to offset the detrimental impact on small regional businesses, LMG does not support these restrictions and urges the Office of Liquor, Gaming and Racing to recommend that the Government reverse the current restrictions.

For further information contact:

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² NSW Bureau of Crime Statistics and Research, *Alcohol and non-alcohol related assault data - Kings Cross, Sydney City and NSW*, 2015.