



Department
of Industry

Liquor & Gaming

Evaluation of the Kings Cross alcohol sales data requirement

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About this document

This document outlines the activities that Liquor & Gaming NSW (L&GNSW) undertook to evaluate the Kings Cross alcohol sales data requirement, and provides findings and recommendations for the Government's consideration. The evaluation assessed whether or not the requirement is meeting its policy objectives and delivering a net benefit. It also considered a range of issues relating to the utility, appropriateness, and quality of the data, the regulatory burden involved in supplying and administering the data, stakeholder understanding of the requirement and its rationale, and venue compliance with the requirement. This report will help to inform the future of alcohol sales data collection in Kings Cross, along with the broader issue of alcohol sales data collection across NSW.

Acknowledgements

L&GNSW would like to thank:

- the stakeholders who participated in the consultation process and provided relevant information and data
- interested parties who provided a public submission to help inform the evaluation
- Kings Cross venues that participated in the venue survey.

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1. Executive Summary

Collection of alcohol sales data is one of a number of alcohol regulatory measures introduced as part of the 2012 plan of management for the Kings Cross precinct. The objectives of the Kings Cross alcohol sales data requirement are to help shape compliance efforts by NSW Police and L&GNSW, and inform future policy decisions by the Government, in relation to the Kings Cross precinct.

Under the requirement, which took effect on 1 January 2014, all licensed venues in the Kings Cross precinct that sell or supply alcohol for consumption on the premises between 8pm and 5am are required to submit quarterly alcohol sales data to L&GNSW in an approved format.

Given that the requirement has now been in effect for over three years, it is timely that the requirement be evaluated. Furthermore, given concerns raised by some industry stakeholders regarding the cost of complying with the requirement, and the cost to Government of maintaining, enforcing and reporting upon this data collection, it is appropriate to consider the outcomes, impacts and net public benefits of the requirement.

The evaluation considered:

1. whether or not the Kings Cross alcohol sales data requirement is meeting its policy objectives and delivering a net benefit
2. the availability and utility of the data to Government, industry, researchers and other stakeholders
3. the appropriateness of the frequency, format, and nature of the alcohol sales data required to be collected by venues
4. the quality and reliability of data supplied by venues and the strategies that would be needed to address any shortcomings that are identified
5. the extent to which the requirement imposes a regulatory burden upon venues and the ways in which any burden may be reduced
6. the level of understanding by venues of the rationale for the requirement and how to comply
7. the level of compliance by venues with the requirement, the reasons for any non-compliance, and any challenges that venues may be experiencing in meeting the requirement
8. other impacts of the Kings Cross alcohol sales data requirement.

To inform its considerations, the evaluation held face-to-face or telephone consultations with 13 stakeholder organisations, invited interested parties to lodge a written submission, and invited Kings Cross venues to complete an online survey. It also considered alcohol sales and venue compliance data.

Key findings

The key findings of the evaluation are as follows:

1. The requirement has made only a limited contribution to informing policy decisions by the Government and has contributed little to shaping compliance efforts in Kings Cross
2. A small number of stakeholders have expressed an interest in accessing and/or using the Kings Cross alcohol sales data, which is not widely available to stakeholders
3. Industry stakeholders feel that the format of the data collection is not user friendly and that the level of detail required is too great
4. The quality of data provided by smaller, lower risk venues is uncertain
5. The requirement places a significant cost and administrative burden upon both venues and L&GNSW
6. Venues typically understand the requirement yet have little understanding of its purpose
7. Venue compliance with the requirement has decreased over time
8. Some stakeholders support replacing the Kings Cross alcohol sales data requirement with a state-wide requirement for the collection of wholesale alcohol sales data.

Recommendations

Based on these findings, the evaluation makes the following recommendations:

1. Consider discontinuing the requirement for Kings Cross venues to provide alcohol sales data to L&GNSW
2. Continue to monitor the utility of wholesale alcohol sales data collection in other Australian jurisdictions, and consider collecting such data in NSW if it becomes apparent in the future that the benefits of such a collection would outweigh its costs
3. Require all of the issues outlined below to be adequately addressed, and appropriate resources made available for this purpose, if the requirement is retained
 - (a) Better communicate the purpose and benefits of the requirement to venues, and inform stakeholders of how the data is being used
 - (b) Publish regular reports, based on aggregated or de-identified data, on the L&GNSW website
 - (c) Provide access to de-identified data files for analysis by bona fide research organisations
 - (d) Exempt venues not categorised as “high risk” from the requirement
 - (e) Remove the collection of data on energy drink sales from the requirement
 - (f) Simplify the format and categories for data collection in consultation with stakeholders
 - (g) Implement a better compliance and enforcement model to ensure that all required venues submit data for each quarter
 - (h) Investigate potentially suitable online data collection systems in consultation with industry stakeholders, including the possibility of developing a secure online portal for the collection of alcohol sales data directly from point-of-sale systems
 - (i) In consultation with other key government agencies, analyse alcohol sales data in conjunction with other relevant data sets.

2. Introduction

2.1. Background

2.1.1. Purpose of alcohol sales data reporting

Collection of alcohol sales data is one of a number of alcohol regulatory measures introduced as part of the 2012 plan of management for the Kings Cross precinct. It was included in the law via amendments made by the *Liquor Amendment (Kings Cross Plan of Management) Act 2012* and the *Liquor Amendment (Kings Cross Plan of Management) Act 2013*.

The Second Reading Speech for the Liquor Amendment (Kings Cross Plan of Management) Bill 2013 states that the objectives of the Kings Cross alcohol sales data requirement are to “help shape compliance efforts by police and the Office of Liquor, Gaming and Racing inspectors, as well as future policy decisions by the Government”.¹

The data is intended to assist L&GNSW to understand the impacts of regulatory interventions in the Kings Cross precinct and inform broader policy development processes. The data is not currently published or made routinely available to non-government sector stakeholders or research institutions. The data has not been made publicly available to date due to privacy considerations and uncertainty about the quality of the data provided by venues.

2.1.2. Requirements of licensed venues

Under the requirement, which took effect on 1 January 2014, all licensed venues in the Kings Cross precinct that sell or supply alcohol for consumption on the premises between 8pm and 5am are required to submit quarterly alcohol sales data to L&GNSW in an approved format (clause 53O of the Liquor Regulation 2008).

Venues must complete an approved form (in Microsoft Excel format) for each quarter, and submit it to L&GNSW within 21 days of the end of each quarter. The form requires venues to report on the volume of alcohol sold in millilitres, with breakdowns for the following drink categories:

- ▲ Light and mid strength beer and cider ($\leq 3.5\%$ ABV²)
- ▲ Full strength beer and cider ($> 3.5\%$ ABV)
- ▲ Wine
- ▲ Ready to drink ($\leq 5\%$ ABV)
- ▲ Ready to drink ($> 5\%$ ABV)
- ▲ Spirits & liqueurs (sold/supplied mixed with energy drink)³
- ▲ Spirits & liqueurs (all other sold/supplied)

¹ <https://www.parliament.nsw.gov.au/bills/DBAssets/bills/SecondReadSpeechLA/1207/2R%20Kings%20Cross.pdf>

² ABV = alcohol by volume

³ For spirits & liqueurs, the volume reported should only include the volume of alcohol sold, not the total including mixer.

▲ Energy drinks

Licensed venues must report alcohol sales volumes between 8pm and 5am each night of the week. High risk venues⁴ must report alcohol sales volumes on an hourly basis, while other venues are only required to report total daily alcohol sales volumes over the duration of this period. The more limited reporting requirements for low risk venues⁵ were introduced from the quarter ending 31 December 2014 to reduce the reporting burden on these venues.

2.2. Evaluation of the Kings Cross alcohol sales data requirement

Feedback from licensed premises since January 2014 had raised questions about the usefulness and net benefit of the mandatory reporting requirement. A number of premises expressed concern about the time and resources required to comply in their submissions to the Callinan Review. In its correspondence to L&GNSW, the Kings Cross Liquor Accord also highlighted the costs of regulatory compliance by venues and questioned the utility of the information that is being collected. These concerns have been accompanied by a reduction in the level of compliance by Kings Cross venues with the requirement.

The Kings Cross alcohol sales data requirement has now been in effect for almost three years. For this reason it is timely that the requirement be evaluated. Such an evaluation is consistent with the Government's response to the "Statutory review of the *Liquor Act 2007* and the *Gaming and Liquor Administration Act 2007*"⁶ where it indicated its support for recommendation 61: "The Government should closely monitor the outcomes of liquor sales data collection in Kings Cross to inform consideration of future data collection requirements in Kings Cross and/or other precincts". Furthermore, given the concerns raised by industry regarding the cost of complying with the reporting requirement, and the cost to Government of maintaining, enforcing and reporting upon this data collection, it is appropriate to consider the outcomes, impacts and net public benefits of the reporting requirement.

The outcomes of the evaluation will be relevant to the future of alcohol sales data collection in Kings Cross, and to the broader issue of the collection of this data across NSW.

2.2.1. Program logic

The *NSW Government Program Evaluation Guidelines*⁷ define program logic as a 'management tool that presents the logic of a program in a diagram or chart (with related

⁴ High risk venues are licensed premises on which liquor may be sold for consumption on the premises, that are authorised to trade after midnight at least once a week on a regular basis, and have a patron capacity (as determined by the Secretary) of more than 120 patrons.

⁵ Low risk venues, for the purpose of this requirement, are licensed premises which are not classified as high risk venues as defined under footnote 4.

⁶ NSW Government 2014, NSW Government response to the "Statutory review of the *Liquor Act 2007* and the *Gaming and Liquor Administration Act 2007*", http://www.liquorandgaming.nsw.gov.au/Documents/liquor/law-and-policy/GovernmentResponse_StatutoryReview_LA_GALAA.pdf

⁷ NSW Department of Premier & Cabinet 2016, *NSW Government Program Evaluation Guidelines*, http://www.dpc.nsw.gov.au/__data/assets/pdf_file/0009/155844/NSW_Government_Program_Evaluation_Guidelines.pdf

descriptions)' and that 'illustrates the logical linkage between the identified need or issues that a program is seeking to address; its intended activities and processes; their outputs; and the intended program outcomes' (p.21). The Guidelines note that before a program begins it is 'best practice to have a complete program plan that includes a clear program logic, and a supporting evaluation plan that includes a detailed evaluation methodology' (p.11).

A program logic model for the Kings Cross alcohol sales data requirement is at **Appendix A**. It outlines the intended immediate, intermediate, and ultimate outcomes of the Kings Cross alcohol sales data requirement. The outcomes articulated in the program logic informed the evaluation objectives.

2.2.2. Evaluation objectives

The objectives of the evaluation were to:

1. determine if the Kings Cross alcohol sales data requirement is meeting its policy objectives and delivering a net benefit
2. examine the availability and utility of the data to Government, industry, researchers and other stakeholders
3. examine the appropriateness of the frequency, format, and nature of the alcohol sales data required to be collected by venues
4. examine the quality and reliability of data supplied by venues and consider what strategies would be needed to address any shortcomings that are identified
5. examine the extent to which the requirement imposes a regulatory burden upon venues and consider ways in which any burden may be reduced
6. examine the level of understanding by venues of the rationale for the requirement and how to comply
7. measure the level of compliance by venues with the requirement, the reasons for any non-compliance, and any challenges that venues may be experiencing in meeting the requirement
8. consider other impacts of the Kings Cross alcohol sales data requirement.

2.2.3. Scope

The scope of the evaluation was focussed on the value of the alcohol sales data, in terms of both the extent to which it contributes to the achievement of the stated policy objectives and the regulatory and compliance costs associated with its operation. It also examined and made recommendations regarding areas of potential improvement. It did not consider other legislative requirements in the Kings Cross precinct.

2.2.4. Evaluation questions

The key evaluation questions related to each objective were:

Objective 1: To determine if the Kings Cross alcohol sales data requirement is meeting its policy objectives and delivering a net benefit.

- ▲ To what extent is the Kings Cross alcohol sales data requirement meeting its policy objectives?
- ▲ Has the requirement helped to shape compliance efforts by NSW Police and L&GNSW in relation to the Kings Cross precinct?
- ▲ Has the requirement helped to inform future policy decisions by the Government in relation to the Kings Cross precinct?
- ▲ Do the benefits of retaining the regulatory requirement outweigh the administrative costs and regulatory burden for business and L&GNSW?

Objective 2: To examine the availability and utility of the data to Government, industry, researchers and other stakeholders.

- ▲ To what extent, and in what ways, is the data made available to stakeholders?
- ▲ How could access to the Kings Cross alcohol sales data be improved?
- ▲ Have Government, industry, researchers and other key stakeholders used the data? If so, how? If not, why not?
- ▲ How can the data be made more useful?

Objective 3: To examine the appropriateness of the frequency, format, and nature of the alcohol sales data required to be collected by venues.

- ▲ What is the optimal frequency of data reporting?
- ▲ What is the most appropriate format for data reporting?
- ▲ What is the most appropriate and useful level of detail for data reporting?
- ▲ Does the requirement for hourly reporting for high risk venues and daily reporting for other venues meet the data needs of stakeholders? If not, what other reporting arrangements would meet these needs?

Objective 4: To examine the quality and reliability of data supplied by venues and consider what strategies would be needed to address any shortcomings that are identified.

- ▲ What data quality issues (with specific reference to the Australian Bureau of Statistics (ABS) Data Quality Framework), if any, affect the Kings Cross alcohol sales data?
- ▲ How can the quality and reliability of data supplied by venues be improved?

Objective 5: To examine the extent to which the requirement imposes a regulatory burden upon venues and consider ways in which any burden may be reduced.

- ▲ To what extent, and in what ways, does the requirement impose a regulatory burden on venues?
- ▲ How could the regulatory burden on venues be minimised?

Objective 6: To examine the level of understanding by venues of the rationale for the requirement and how to comply.

- ▲ Have Kings Cross venues been provided with sufficient education and support to help them comply with the requirement?
- ▲ How well do venues understand how to comply with the requirement?

- ▲ How well do venues understand the rationale for the requirement?

Objective 7: To measure the level of compliance by venues with the requirement, the reasons for any non-compliance, and any challenges that venues may be experiencing in meeting the requirement.

- ▲ What is the rate of venue compliance with the requirement, including timeliness of delivery, and how has this changed over time?
- ▲ What types of venue tend to be less compliant with the requirement, and what are the reasons for this?
- ▲ What challenges, if any, are venues experiencing in meeting the requirement?
- ▲ To what extent do various types of enforcement action for failure to supply alcohol sales data influence rates of compliance?

Objective 8: To consider other impacts of the Kings Cross alcohol sales data requirement.

- ▲ Are there any other impacts or unintended consequences of the Kings Cross alcohol sales data collection?
- ▲ Are there any improvements that can be made to the administration and enforcement of the requirement?
- ▲ Are there any lessons that can be learned from alcohol sales data collections in other jurisdictions?
- ▲ What are the potential benefits, if any, of extending the alcohol sales data requirement beyond the Kings Cross precinct?
- ▲ What are the potential administrative costs and regulatory burdens associated with extending the alcohol sales data requirement beyond the Kings Cross precinct?
- ▲ If extension of the requirement beyond the Kings Cross precinct is to be considered, to which venues should the requirement apply and, if it only applies to a sub-group of venues, what are the limitations of restricting the collection to this sub-group?

3. Methodology

The evaluation involved both process and outcome evaluation. It utilised a mixed methods approach whereby a range of quantitative and qualitative evidence was collected and analysed. The central premise of the mixed methods approach is that it provides a better understanding of research problems than either a quantitative or qualitative approach alone (Creswell & Plano Clark 2011⁸).

Qualitative evidence was collected through:

- ▲ key stakeholder consultation
- ▲ a venue survey for Kings Cross licensees
- ▲ written submissions from key stakeholders
- ▲ information obtained from other jurisdictions.

Quantitative evidence was collected through:

- ▲ alcohol sales data provided by licensed venues in the Kings Cross precinct
- ▲ L&GNSW compliance data
- ▲ venue survey data.

3.1. Stakeholder consultations

Key stakeholder organisations were consulted via face-to-face interviews, or telephone interviews where face-to-face was impractical, during March-June 2017. Interview questions focused on the evaluation objectives which most impacted the individual stakeholder groups, including:

- ▲ the availability and utility of the data to key stakeholder groups
- ▲ views on the appropriateness of the frequency, format, and nature of the alcohol sales data required to be collected by venues
- ▲ views on the quality and reliability of the data
- ▲ views on the regulatory burden of the requirement and how this can be minimised
- ▲ stakeholder understanding of the requirement and its rationale
- ▲ any unintended consequences of the requirement
- ▲ any other positive or negative impacts of the requirement
- ▲ views on future policy directions regarding the requirement.

The stakeholders interviewed for this evaluation were:

- ▲ Australian Hotels Association (NSW) (AHA)
- ▲ Foundation for Alcohol Research & Education (FARE)
- ▲ Kings Cross Liquor Accord
- ▲ L&GNSW - Compliance Operations, Policy & Legislation, and Intelligence units

⁸ Creswell, JW & Plano Clark, VL 2011, *Designing and conducting mixed methods research*, 2nd edn, Sage Publications, Thousand Oaks, CA.

- ▲ National Drug Research Institute at Curtin University (NDRI)
- ▲ NSW Bureau of Crime Statistics and Research (BOCSAR)
- ▲ NSW Government Data Analytics Centre (DAC)
- ▲ NSW Ministry of Health
- ▲ NSW Police – Alcohol & Licensing Enforcement Command
- ▲ NSW Police – Kings Cross Local Area Command
- ▲ Office of the NSW Small Business Commissioner
- ▲ Red Bull Australia Pty Ltd
- ▲ Restaurant & Catering Australia

A number of other stakeholders were invited to a meeting but declined to be interviewed.

3.2. Written submissions

Stakeholders were given the opportunity to make a written submission to help inform the evaluation. The submission period opened on 15 March 2017 and closed on 9 April 2017. The submission process was promoted via an email to key stakeholders on 15 March 2017 and information on the L&GNSW website. Information about the evaluation, including a Discussion Paper (**Appendix B**), was published on the L&GNSW website.

Four written submissions were received by the evaluation. A list of stakeholders that lodged a written submission is at **Appendix C**.

3.3. Venue survey

All venues with an active liquor licence in the Kings Cross precinct were invited to complete an online survey (**Appendix D**). Survey questions focused on:

- ▲ the availability and utility of the data to key stakeholder groups
- ▲ views on the appropriateness of the frequency, format, and nature of the alcohol sales data required to be collected by venues
- ▲ views on the quality and reliability of the data
- ▲ views on the regulatory burden of the requirement and how this can be minimised
- ▲ licensee understanding of the requirement and its rationale
- ▲ any challenges in complying with the requirement
- ▲ any unintended consequences of the requirement
- ▲ any other positive or negative impacts of the requirement
- ▲ views on future policy directions regarding the requirement.

The venue survey was completed by 13 respondents, 3 holding a hotel licence and 10 holding an on-premises licence.

3.4. Compliance and alcohol sales data

Kings Cross alcohol sales data was sourced from within L&GNSW. Data is currently supplied by each Kings Cross venue on a quarterly basis and imported into a purpose-built Microsoft Access database. Data was extracted from the Access database and the evaluation examined its quality and reliability. Internal L&GNSW reports on the Kings Cross alcohol

sales data were also examined to inform the evaluation's consideration of how the data is being used.

Compliance data was sourced from L&GNSW's RegIS business system. This data indicated, for each venue, whether or not alcohol sales data had been submitted for each quarter from January 2014 to March 2017, the date on which data was submitted if submitted late, and any penalties imposed upon venues for failing to comply with the requirement. An analysis of this data was undertaken to examine any change in the compliance rate over time and to determine any patterns in relation to non-compliance with the requirement.

3.5. Information from other jurisdictions

Information was sought from each Australian jurisdiction to inform the evaluation. Each jurisdiction provided written responses to the questions provided at **Appendix E**.

4. Discussion and findings

4.1. Summary of stakeholder views

There was consensus among stakeholders that the Kings Cross alcohol sales data requirement had only made a limited contribution to informing policy decisions by the Government and had contributed little to shaping compliance efforts in Kings Cross. In addition, a number of stakeholders, including the AHA and Kings Cross Liquor Accord, suggested that the policy objectives may no longer be valid given the significant reductions in alcohol-related violence in the Kings Cross precinct since the introduction of the February 2014 liquor law reforms. With regard to data availability, Kings Cross alcohol sales data has not been made publicly available and access to the data is limited. A small number of stakeholders, including the AHA and BOCSAR, expressed a specific interest in accessing and/or using the data.

A common theme among stakeholders was their lack of understanding of the purpose of the requirement. It was apparent that while stakeholders understand the requirement and what is required of venues to comply, they have little understanding of the rationale for the requirement. It was suggested by some stakeholders, such as Restaurant & Catering Australia and the Office of the NSW Small Business Commissioner, that this may have affected both data quality and compliance with the requirement.

Industry stakeholders expressed significant concerns as to the burden of the requirement upon venue operators, particularly for smaller, lower risk venues such as restaurants. As smaller, lower risk venues typically have fewer staff, less sophisticated collection and recording systems, and smaller revenues, industry stakeholders argued that the burden of the requirement fell disproportionately upon these venues. They suggested that such venues were therefore less likely to comply with the requirement, and questioned the accuracy and reliability of the data supplied by these venues.

4.2. Key findings

1. The requirement has made only a limited contribution to informing policy decisions by the Government and has contributed little to shaping compliance efforts in Kings Cross

The objectives of the requirement are to help shape compliance efforts by NSW Police and L&GNSW, and inform future policy decisions by the Government, in relation to the Kings Cross precinct. The evaluation found little evidence to suggest that the requirement had contributed to shaping compliance efforts by NSW Police and L&GNSW. While NSW Police reported using alcohol sales data on one specific occasion as supporting evidence for a short-term closure application, it has not been specifically used to inform the direction of Police resources or otherwise shape their compliance efforts. NSW Police suggested that the data could potentially be used for such purposes in the future, though only if they had greater confidence in the accuracy of, and timely access to, the data.

L&GNSW similarly indicated that it has not used the data to shape compliance efforts to date, as they have access to a range of other data and intelligence that is more useful and reliable for this purpose. This includes data from NSW Police's Alcohol-Related Crime Information Exchange (ARCIE) and a range of NSW Police reports (e.g. glassings reports, serious violence reports, 3 Strikes reports), BOCSAR data, OneGov data, and penalty notice data from the Revenue NSW.

With regard to its objective of informing future policy decisions by the Government, the requirement has made a limited contribution. The NSW Government held a series of roundtable meetings between March and May 2016 to examine the challenges and opportunities for growing a safe and vibrant night-time economy in Sydney. A summary of key alcohol sales data was provided to this roundtable for its consideration. The roundtable process led to the development of an action plan, and the Government announced its response to the action plan in December 2016⁹. The action plan included a specific recommendation regarding the collection, management and use of key data, and the Government's response noted that the "NSW Data Analytics Centre, within the Department of Finance, Services and Innovation, will work with agencies across government to create a central platform of key data sets relating to Sydney's night-time economy" (p.6).

In addition to the work of the Sydney Night-Time Economy Roundtable, an internal L&GNSW report, which outlined key findings from the alcohol sales data collection, was referred to the Hon. Ian Callinan QC in mid 2016 for consideration in his review of amendments to the *Liquor Act 2007*¹⁰. Mr Callinan's report made minor reference to findings from the Kings Cross alcohol sales data collection (p.134), however it is unclear the extent to which this information informed Mr Callinan's recommendations. This L&GNSW report, and similar reports covering earlier periods of the data collection, was also referred to the Minister for Racing for information. Alcohol sales data has not been useful to L&GNSW in informing its policy considerations in relation to the Kings Cross precinct due to concerns about the reliability of the data and the availability of other data that is more useful and reliable for this purpose.

2. A small number of stakeholders have expressed an interest in accessing and/or using the Kings Cross alcohol sales data, which is not widely available to stakeholders

Kings Cross alcohol sales data has not been made publicly available to date. A number of reports on the alcohol sales data have been provided to the Minister for Racing for information. As noted above, summary data was made available to both the Sydney Night-Time Economy Roundtable and the Callinan Review. In addition, aggregated data was provided to BOCSAR to assist with its research into the effects of liquor licensing restrictions

⁹ NSW Government 2016, *NSW Government response to the Sydney Night-Time Economy Roundtable*, <http://www.liquorandgaming.nsw.gov.au/Documents/about-us/Night-time-economy-roundtable-actions-NSW-Government-Response-Dec-2016.pdf>

¹⁰ Callinan, IDF 2016, *Review of amendments to the Liquor Act (2007)*, <http://www.liquorlawreview.justice.nsw.gov.au/>

on assaults in Sydney. An article based on this research was subsequently published¹¹. The report noted that alcohol sales showed a “steep fall in litres of alcohol sold in Kings Cross between the first quarter of 2014 and the first quarter of 2015” (Menendez, Kypri & Weatherburn 2017, p.266) and BOCSAR has argued that such findings suggest a potential mechanism via which liquor licensing restrictions can impact upon alcohol-related violence.

Few stakeholders have expressed an interest in accessing and/or using the Kings Cross alcohol sales data. The NSW Ministry of Health and the DAC indicated that the data had little value in assessing the impact of the February 2014 liquor law reforms as the data collection did not commence until 1 January 2014 and, as such, an adequate period of pre-intervention data is unavailable. The NSW Ministry of Health and the DAC also commented that the data would be of limited use as it is only available for one precinct area and thus does not allow for any sort of comparison by area. With regard to industry stakeholders, 100% of venue survey respondents indicated that they would gain no benefit from access to summary data from the collection, and peak industry associations were similarly sceptical that the data would be of any use to the industry.

Of those stakeholders consulted for the evaluation, BOCSAR was the only organisation to identify specific potential uses for the data. BOCSAR indicated that there are three main potential uses of alcohol sales data for policy research purposes:

- ▲ Quantifying the relationship between alcohol sales and harm (e.g. crime, accidents, disease)
- ▲ Evaluating the impact of liquor licensing reform on alcohol sales
- ▲ Identifying best practice in the management of licensed premises.

BOCSAR argues that alcohol sales data is required to help answer unresolved questions such as the relationship between sales of different types of alcohol and alcohol-related harm; the relationship between liquor licence types and alcohol related harm; the interaction between alcohol sales, licensed premises management practices and alcohol related harm; and the interaction between alcohol sales, venue capacity and alcohol related harm. It also argues that alcohol sales data is useful as a measure of unintended consequences on business when liquor licensing reforms are introduced, and can be useful in identifying the mechanism responsible for changes in harm in response to harm reduction measures. Finally, BOCSAR argues that the availability of alcohol sales data can contribute to identifying best practice venue management, making it possible to identify the practices and features of venues which sell significant quantities of alcohol but have comparatively low rates of violence.

¹¹ Menendez, P, Kypri, K & Weatherburn, D 2017, ‘The effect of liquor licensing restrictions on assault: a quasi-experimental study in Sydney, Australia’, *Addiction*, vol. 112, no. 2, pp. 261-268.

3. Industry stakeholders feel that the format of the data collection is not user friendly and that the level of detail required is too great

A common theme among industry stakeholders was that the format of the data collection is not user friendly. Currently L&GNSW provides a formatted Microsoft Excel spreadsheet on its website each quarter for venues to download. Venues are required to populate the fields pertaining to their venue risk category (i.e. either high or low risk¹²). There are eight categories of drink type and seven hours of reporting each night. This means that high risk venues are required to populate 56 fields per day, which amounts to 20,440 individual data entries per year. One high risk venue consulted for the evaluation suggested that it cost several thousand dollars per year in staff time to comply with the requirement, despite the venue having a sophisticated point-of-sale (POS) system. The same venue reported that the approved L&GNSW reporting format was incompatible with their sales recording systems. Without significant software re-design, and associated cost, the process will remain largely manual even for larger venues.

To help inform the evaluation's consideration of these issues, L&GNSW surveyed Kings Cross venues with a requirement to provide alcohol sales data. When asked how long the requirement takes to complete each quarter, 53.8% reported that it took between 2 and 6 hours while 38.5% of respondents reported that it took 12 or more hours. This constitutes a significant administrative burden on venues. When asked to specify the challenges involved in alcohol sales reporting in the venue survey, resourcing costs (including staff time) and the time required to complete the reports were highlighted as the two biggest challenges for venues (92.3% of respondents identified each of these as significant challenges). In addition to the venue survey, the Kings Cross Liquor Accord, Restaurant & Catering Australia and the AHA all highlighted the time burden associated with compiling and submitting the data, and specifically referred to the onerous nature of the reporting requirement.

“The level of detail that is required in Liquor & Gaming NSW’s quarterly alcohol sales data document is too onerous and can take a lengthy amount of time to complete manually.”

Restaurant & Catering Australia Submission

Overall, industry stakeholders were of the view that if the requirement was to be retained, the drink type categories for data collection should be simplified. The Kings Cross Liquor Accord suggested that there were too many drink types and that it is not clearly articulated as to why some of them are included. In the venue survey, 61.5% of respondents felt that the current drink type categories were not the most appropriate. As an example, venues are currently required to separately report on sales of ‘ready to drink’ beverages with greater than 5% alcohol content, and those with less than or equal to 5% alcohol content. As the volume of ‘ready to drink’ sales is very small in comparison to other drink types, there is little justification for maintaining separate recording categories for ‘ready to drink’ sales based on

¹² High risk venues are required to report alcohol sales for each hour of the night (from 8pm to 5am) while low risk venues are only required to report daily sales totals.

alcohol content. Other stakeholders, such as Red Bull, argued that there is no evidence to support the collection of energy drink sales data as part of the requirement.

4. The quality of data provided by smaller, lower risk venues is uncertain

It is difficult for L&GNSW to determine the accuracy and reliability of the Kings Cross alcohol sales data due to the self-reported nature of the collection. L&GNSW suspects that the data provided by high risk venues is relatively accurate given that those venues predominantly use sophisticated electronic POS systems and transfer data directly from these systems into the reporting format required by L&GNSW. Lower risk venues, however, do not necessarily have access to the same sophisticated electronic systems for recording alcohol sales. This suspicion has been confirmed by a number of stakeholders, including the AHA, Kings Cross Liquor Accord, Potts Point Partnership and Restaurant & Catering Australia, who questioned the accuracy and reliability of data provided by smaller, lower risk venues.

“Many of the smaller venues and restaurants required to report their alcohol sales data lack the point of sale systems which make this data collection straightforward, also raising questions as to the accuracy of data reported.”

Potts Point Partnership Submission

“Small businesses, many of which are licensed restaurants and cafes, are far less likely to possess the kind of advanced technology needed to automatically record alcohol sales data.”

Restaurant & Catering Australia Submission

While it is likely that some smaller, lower risk venues are providing accurate and reliable data, some venues may be providing approximated or incorrect sales data due to the time and resources required to record and report this data properly. An example of this could be a restaurant reporting a single bottle of wine sold in a night at a normally busy venue. While it is possible that this is an accurate portrayal of the venue’s alcohol sales, this is unlikely given sales reported by comparable venues. It would be difficult for L&GNSW to confirm or verify these figures in the absence of detailed auditing of venue financial records, and even then it is unclear the extent to which such audits may be able to determine the accuracy of alcohol sales reporting at smaller venues with less sophisticated financial recording systems. There is unlikely to be a solution to this problem because as long as the data remains self-reported it will be difficult and resource-intensive to determine if venues are entering the data appropriately.

To further examine the quality of the Kings Cross alcohol sales data collection, an analysis of the data was conducted against the ABS Data Quality Framework¹³. This framework was designed to be used in evaluating the quality of statistical collections and products, including administrative data. It is comprised of seven dimensions of quality: Institutional Environment, Relevance, Timeliness, Accuracy, Coherence, Interpretability and Accessibility. The Kings

¹³ <http://www.abs.gov.au/ausstats/abs@.nsf/mf/1520.0>

Cross alcohol sales data collection was found to be deficient in at least five of these seven dimensions of data quality (i.e. Institutional Environment, Relevance, Accuracy, Interpretability and Accessibility).

5. The requirement places a significant cost and administrative burden upon both venues and L&GNSW

The administrative burden and cost of providing alcohol sales data is significant for venue operators. One large Kings Cross venue consulted as part of the evaluation estimated that despite having sophisticated POS software, complying with the requirement cost several thousand dollars per year in staff hours. The burden on lower risk venues is particularly significant. Lower risk venues are more likely to have fewer staff, less sophisticated collection and recording systems, and lower revenues. This means that any additional administrative costs have a greater proportional impact on the bottom line of a business.

“many smaller cafes and restaurants are using much less sophisticated recording mechanisms for alcohol sales which, in turn, magnifies the level of inconvenience placed on these businesses.”

Restaurant & Catering Australia Submission

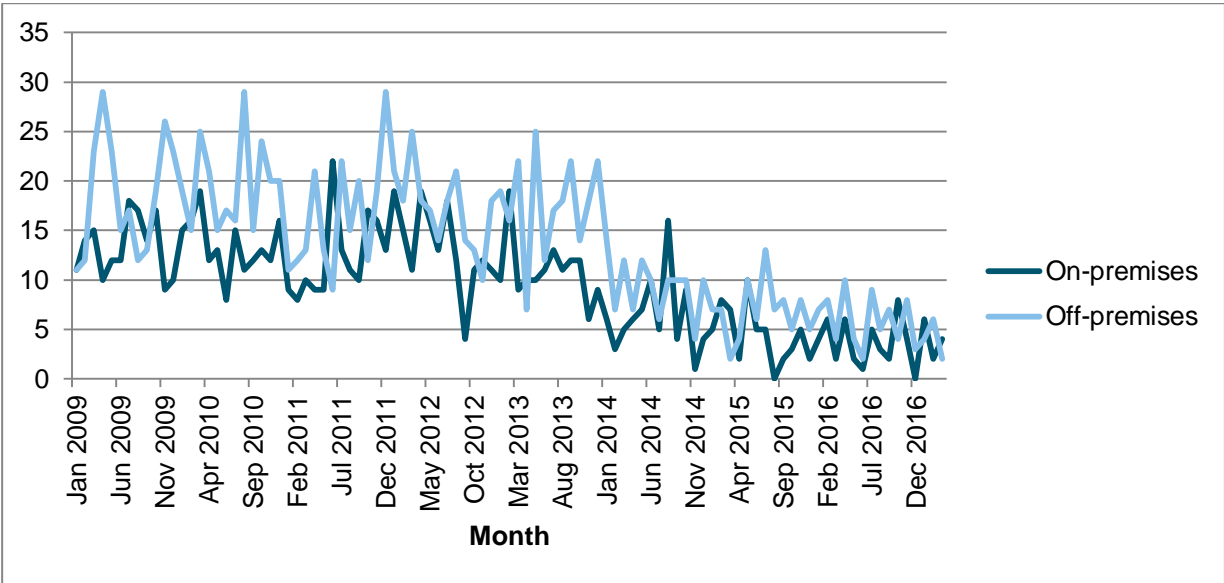
In addition to the burden placed on venues, the manual processes involved in the data collection also place a significant burden on L&GNSW. The agency is required to collect individual data files via email and manually input these data files into a database so that the data can be aggregated and analysed. There is also a significant burden upon L&GNSW in terms of enforcing compliance with the requirement. This includes following up with venues that fail to submit by the deadline, determining active trading status of venues throughout the reporting period, issuing warning or penalty notices, and communicating with industry stakeholders to ensure awareness of, and improve compliance with, the requirement.

6. Venues typically understand the requirement yet have little understanding of its purpose

Consultation with stakeholders indicated that venues typically understand how to comply with the requirement yet have little understanding of its purpose. With regard to the venue survey findings, 61.6% of respondents reported their level of understanding of the requirement to be high or very high, and a further 23.1% reported their level of understanding to be moderate. In contrast, only 23.1% of survey respondents reported a high or very high level of understanding of the purpose of the requirement, and 38.5% reported a low or very low level of understanding. These findings were supported by the AHA and Kings Cross Liquor Accord who indicated that there was little understanding of the policy rationale for the requirement among Kings Cross licensees. Not only do venues not understand the rationale for the collection of alcohol sales data from licensed venues, they do not understand why the requirement is solely targeted at venues in Kings Cross. Given the substantial reductions in violence that have been observed in Kings Cross in recent years, venues and industry associations believe that imposing the alcohol sales data requirement on Kings Cross venues is unwarranted.

These views are supported by research evidence showing a significant reduction in assaults in Kings Cross since the February 2014 liquor law reforms. In analysing data to September 2016, BOCSAR found a statistically significant 49% reduction in non-domestic assaults in the Kings Cross precinct since the 2014 liquor law reforms¹⁴. The sustained reduction in alcohol-related assaults in the Kings Cross precinct can also be seen in the most recent BOCSAR data to March 2017 (see Figure 1). These findings support the suggestion that the Kings Cross precinct has changed significantly since the alcohol sales data requirement was introduced in January 2014.

Figure 1 – The number of alcohol-related non-domestic assaults (on and off-premises) in the Kings Cross precinct for each month from January 2009 to March 2017.



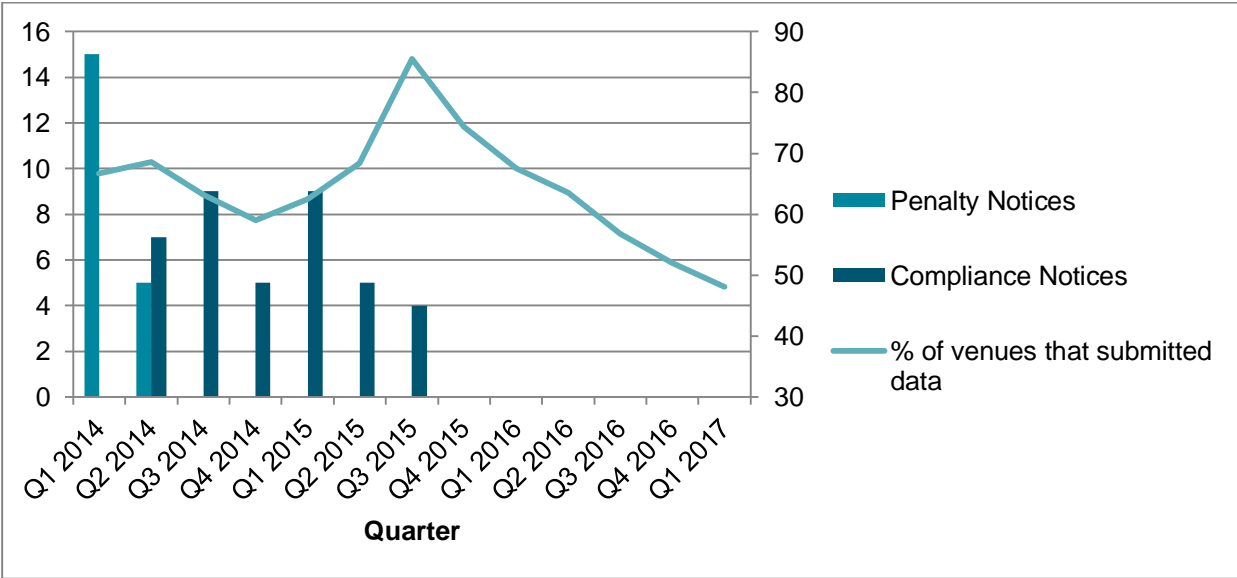
Venue uncertainty around the purpose of the data collection has been exacerbated by the fact that the data has not been made public and venues have not been provided with information as to how the data has been or will be used. Potts Point Partnership, for example, stated that licensed venues in Kings Cross were unclear about the reasons for collecting the data and were also unclear as to what it was being used for. Consistent with these findings, only 46.2% of venue survey respondents indicated that they felt that L&GNSW had provided sufficient support to ensure their venue’s understanding of the requirement.

7. Venue compliance with the requirement has decreased over time

Figure 2 shows the percentage of trading venues that submitted their data for each quarter since 1 January 2014. While the rate of compliance was initially quite high, it has since fallen significantly over time.

¹⁴ Donnelly, N, Poynton, S & Weatherburn, D 2016, *The effect of lockout and last drinks laws on non-domestic assaults in Sydney: An update to September 2016* (Crime and Justice Bulletin No. 201), NSW Bureau of Crime Statistics and Research, Sydney

Figure 2 - The percentage of Kings Cross venues that submitted alcohol sales data in each quarter, and the quarterly number of penalty and compliance notices issued to Kings Cross venues for failing to comply with the alcohol sales data requirement, since Quarter 1 2014¹⁵.



The reduction in compliance rates over time has coincided with a reduction in enforcement of the requirement. Figure 2 shows the number of penalty and compliance notices issued to venues for each quarter since 1 January 2014 for failing to comply with the alcohol sales data requirement. L&GNSW had initially issued penalty notices to venues for failing to submit their data by the required date (see Quarters 1 and 2, 2014 in Figure 2), which would have led to the automatic imposition of a strike upon the venue under the Three Strikes Disciplinary Scheme. However, these penalty notices were subsequently revoked after it became clear that the courts were likely to overturn these strikes under section 10 of the *Crime (Sentencing Procedures) Act 1999*. Venues that failed to submit alcohol sales data were subsequently issued with a compliance notice up to and including Quarter 3 2015. Since Quarter 3 2015, no compliance notices have been issued to venues for failing to submit their alcohol sales data. In addition, given recent concerns about the reliability and usefulness of the data and the need to prioritise other enforcement activities, enforcement action in relation to the requirement has not been prioritised.

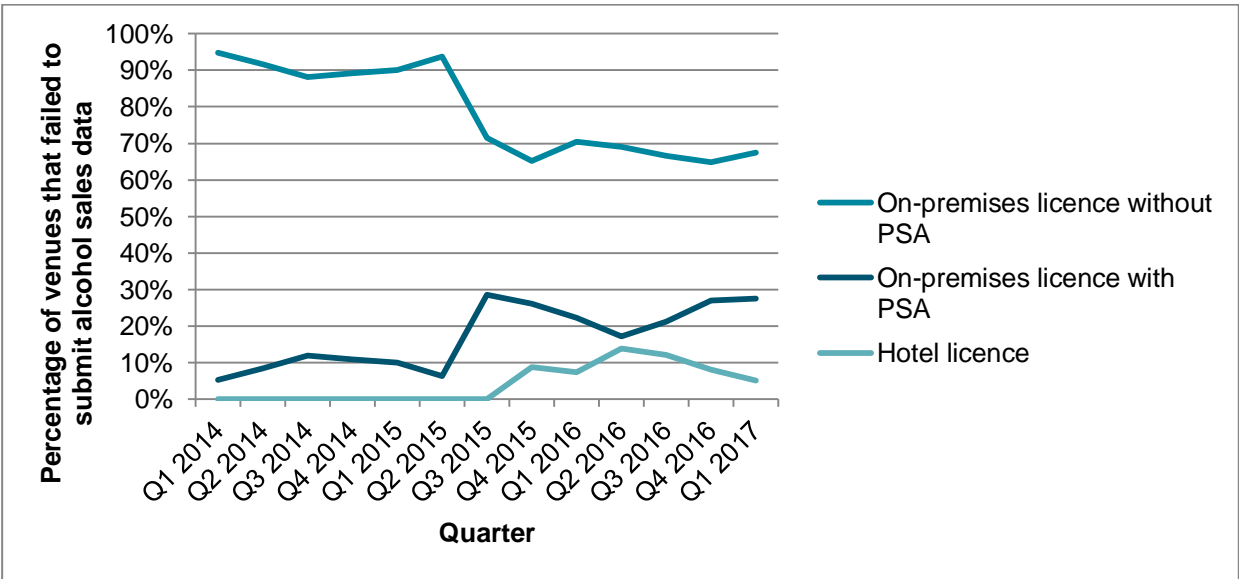
Figure 2 shows that the percentage of venues submitting their data has fallen significantly since the time at which L&GNSW ceased issuing compliance notices for failing to submit alcohol sales data. In the most recent quarter, only 48.1% of venues submitted their alcohol sales data. While this suggests that the cessation of enforcement activity may have contributed to the reduction in venue compliance, other factors may also have contributed to this reduction. For example, the lack of understanding among venues as to the rationale of

¹⁵ The number of venues that were required to provide alcohol sales data in each quarter was limited to those active licences that were authorised to supply alcohol for consumption on the premises and that had not informed L&GNSW if they were not trading during the reporting period. The percentages in Figure 1 for the period up to and including Quarter 2 2015 underestimate the rate of venue compliance as there were a number of dormant liquor licences in the Kings Cross precinct that were removed following the introduction of annual liquor licence fees in mid-2015.

the requirement, and the perception among venues that the data is not being used by Government, may have contributed to this reduction in compliance over time.

The percentage of non-submitting venues that hold a higher risk type of licence has also increased since L&GNSW ceased issuing compliance notices for failing to submit alcohol sales data. Figure 3 indicates that most venues that failed to submit alcohol sales data held an on-premises licence without a primary service authorisation (PSA). However, the percentage of non-submitting venues that held this type of licence fell over time, from 94.7% in Quarter 1 2014 to 67.5% in Quarter 1 2017. This coincided with an increase in hotels and venues with an on-premises licence with a primary service authorisation failing to submit data from Quarter 3 2015.

Figure 3 – The percentage of on-premises and hotel licences among those venues that failed to submit data for each quarter since Quarter 1 2014.



8. Some stakeholders support replacing the Kings Cross alcohol sales data requirement with a state-wide requirement for the collection of wholesale alcohol sales data

Some stakeholders indicated that although there is some value in collecting retail alcohol sales data, there are limitations to the usefulness of data collected from venues in the Kings Cross precinct. FARE, the NSW/ACT Alcohol Policy Alliance (NAAPA), and the NDRI all argued that it would be more appropriate to implement a state-wide requirement for the collection of wholesale alcohol sales data to estimate and compare alcohol consumption levels across the state. Furthermore, these stakeholders noted that accurate and reliable estimates of alcohol consumption levels could not be made in the absence of data from wholesalers, packaged liquor stores and online retailers.

Although these stakeholders argued that the collection of retail sales data would be ideal (as supported by Rankin & Livingston 2016¹⁶ and the World Health Organization 2000¹⁷), most agreed that appropriate resources and systems were not in place for the current requirement to be implemented across the state. NDRI suggested that the collection of state-wide wholesale data would be the most appropriate way forward given the logistical issues involved in collecting state-wide retail sales data. Similarly, FARE argued that although the collection of alcohol sales data from all licensed premises would be ideal, the current method of collection is burdensome for venues in the Kings Cross precinct. FARE suggested that the collection of state-wide wholesale data be prioritised and that online sales be carefully monitored. NAAPA recommended that the NSW Government consider ways to make the collection of retail sales data easier. In addition, NAAPA recommended that NSW should collect wholesale and producer alcohol sales data.

NSW and South Australia are the only two Australian jurisdictions that do not currently collect, or have made a commitment to collect, state-wide wholesale alcohol sales data. In response to a 2007 Ministerial Council on Drug Strategy resolution highlighting the absence of systematic and standardised Australia-wide alcohol sales data collection, the Australian Government has funded the Drug and Alcohol Office of Western Australia and the National Drug Research Institute at Curtin University of Technology to develop the National Alcohol Sales Data Project (NASDP). The impetus for the Ministerial Council's resolution was the discontinuation of alcohol sales data collection by most jurisdictions following a 1997 High Court decision that resulted in doubts about whether or not licensing fees and levies were excise duties and, as such, illegal under the terms of the Australian Constitution because only the Commonwealth Government was empowered to impose excise duties¹⁸. The overall objective of the NASDP is to construct an ongoing, regularly updated, national database of standardised wholesale alcohol sales data, which includes all Australian states and territories.

This evaluation considered the objectives, benefits and limitations experienced by other jurisdictions in collecting state-wide wholesale data. Most jurisdictions reported that the objectives of wholesale data collection were to monitor alcohol consumption levels across the respective states and territories and to inform policy development and harm minimisation strategies. All jurisdictions that collect wholesale alcohol sales data also supply this data to their relevant Health departments and/or Curtin University's NASDP for research purposes. The NASDP has published a series of reports on the data which provide information on jurisdictional alcohol consumption trends focused at an LGA level¹⁹.

¹⁶ Rankin, G & Livingston, M 2016, *Understanding alcohol sales data in Australia*, Foundation for Alcohol Research and Education, Canberra.

¹⁷ World Health Organization 2000, *International guide for monitoring alcohol consumption and related harm*, <http://apps.who.int/iris/handle/10665/66529>

¹⁸ Loxley, W, Gilmore, W, Catalano, P & Chikritzhs, T 2016, *National Alcohol Sales Data Project: Stage Five Report*, National Drug Research Institute, Curtin University, Perth, <https://ndri.curtin.edu.au/local/docs/pdf/nasdp/nasdp005.pdf>

¹⁹ <https://ndri.curtin.edu.au/research/nasdp.cfm>

Although the methods used to collect alcohol sales data vary across jurisdictions, there are some overlapping issues in relation to the feedback received from venues, compliance with requirements, and data quality. Some jurisdictions reported receiving feedback about the administrative burden of the requirement, particularly for licence holders operating smaller businesses. Most jurisdictions reported that the data was generally considered reliable, but internal quality checks were often needed to identify inconsistencies or invalid entries. Penalties and disciplinary action were reported as potential consequences for non-compliance for many jurisdictions. Jurisdictions reported that some licensees needed to be prompted to submit data. It should be noted that while the type of data collected in NSW differs to the type of data collected in other jurisdictions, similar logistical issues have been experienced in the implementation of alcohol sales data reporting requirements.

5. Recommendations

1. Consider discontinuing the requirement for Kings Cross venues to provide alcohol sales data to L&GNSW

With regard to its policy objectives, the evaluation found that the requirement made only a limited contribution to informing policy decisions and contributed little to shaping compliance efforts in Kings Cross. Furthermore, given the significant reductions in alcohol-related violence in Kings Cross since the introduction of the February 2014 liquor law reforms, the policy objectives of the requirement may no longer be valid. The risk profile of Kings Cross has changed significantly since 2014, with the precinct now offering a more diverse mix of venues and attracting patrons who are at lower risk of involvement in alcohol-related violence. The evaluation considers there is no longer a clear rationale for maintaining an alcohol sales data collection in the Kings Cross precinct as opposed to any other entertainment precinct.

The requirement also imposes a significant regulatory burden on licensed premises, which appears to outweigh any benefit that is derived from collecting the data. To reach a point where the data may be of value to Government agencies and research organisations, the data collection would need to be expanded to include other areas and significant resources would need to be directed towards improving the quality and reliability of the data and ensuring that all venues comply with the requirement. However, the value of directing L&GNSW resources to developing, managing and enforcing such a data collection would need to be carefully considered given the limited use that is likely to be made from the data collected. In addition, to alleviate the data collection burden upon venues, significant resources may need to be directed toward developing a sophisticated data collection system which is able to automatically extract sales data from point-of-sale systems.

Given these issues, the evaluation recommends that the requirement for Kings Cross venues to provide alcohol sales data to L&GNSW be discontinued. The discontinuation of this requirement would alleviate unnecessary regulatory burden on Kings Cross venues and would be consistent with the Government's better regulation principles. More specifically, discontinuation of the requirement would be consistent with better regulation principle 1 that "Government action should only occur where it is in the public interest, that is, where the benefits outweigh the costs" (p. 6)²⁰.

2. Continue to monitor the utility of wholesale alcohol sales data collection in other Australian jurisdictions, and consider collecting such data in NSW if it becomes apparent in the future that the benefits of such a collection would outweigh its costs

There is support from some stakeholders for collection of wholesale alcohol sales data across NSW rather than collection of retail alcohol sales data in Kings Cross. Consultation

²⁰ NSW Department of Finance, Services & Innovation 2016, *NSW Guide to Better Regulation*, https://www.finance.nsw.gov.au/sites/default/files/guide_better_regulation_october_2016.pdf

with other jurisdictions suggested that wholesale alcohol sales data has some value in informing policy development and monitoring overall patterns of alcohol consumption across jurisdictions. However, the collection of such data is resource-intensive and suffers from some of the same compliance and data quality issues that have been experienced in Kings Cross. This is particularly the case for smaller producer/wholesalers, many of whom would be likely to experience difficulty in providing detailed, accurate sales data due to a lack of sufficiently sophisticated data collection systems.

Furthermore, such data is limited in the extent to which it can inform locality-specific licensing and policy decisions as it does not provide a sufficiently granular profile of alcohol consumption in specific precincts and other key locations. It would also have significant cost and resource implications for both industry and the NSW Government. The aforementioned limitations suggest that, at present, the costs of a statewide wholesale data collection in NSW would outweigh its benefits. Given this, collection of wholesale alcohol sales data across NSW is not recommended at this time. It is instead recommended that NSW continue to monitor the utility of wholesale alcohol sales data collection in other Australian jurisdictions, and consider collecting such data in NSW if it becomes apparent in the future that the benefits of such a collection would outweigh its costs.

3. Require all of the issues outlined below to be adequately addressed, and appropriate resources made available for this purpose, if the requirement is not discontinued

While retention of the requirement is not recommended, it could potentially be justified if all of the issues identified in this report were adequately addressed. This would require the reallocation of resources from other programs by L&GNSW if additional resources were not forthcoming. The evaluation recommends the following as a minimum if the requirement was to be retained.

(a) Better communicate the purpose and benefits of the requirement to venues, and inform stakeholders of how the data is being used

The purpose of the Kings Cross alcohol sales data reporting requirement is unclear to most stakeholders. Licensed venues have indicated that they do not understand why the requirement only applies to venues in the Kings Cross precinct, given the observed declines in alcohol-related assaults in the precinct since the requirement was first introduced in 2014²¹. Furthermore, many stakeholders have argued that the burden of reporting on alcohol sales data has not been justified because venues are uncertain about how the data is being used. In its submission, NAAPA stated that it was unable to comment on whether the requirement's policy objectives have been met, due to the lack of visibility on the purpose and use of the data.

²¹ Donnelly, N, Poynton, S & Weatherburn, D 2016, *The effect of lockout and last drinks laws on non-domestic assaults in Sydney: An update to September 2016* (Crime and Justice Bulletin No. 201), NSW Bureau of Crime Statistics and Research, Sydney.

It is recommended that, if the alcohol sales data reporting requirement was to be retained, the purpose and benefits of the requirement, and the reasons for its retention, should be better articulated by the Government and clearly communicated to licensed venues in the Kings Cross precinct.

It was suggested by some stakeholders, including the Office of the NSW Small Business Commissioner, that compliance with the requirement may improve if venues have a better understanding of the policy rationale for reporting on alcohol sales data. If the recommendations in this report are implemented, L&GNSW should use available communication channels and stakeholder engagement activities to inform stakeholders of how the data will be used and provide examples of how the policy objectives will be met. A clearer understanding of the purpose of collecting alcohol sales data and increased visibility of how the data will be used may provide a greater incentive for venues to supply the data.

(b) Publish regular reports, based on aggregated or de-identified data, on the L&GNSW website

Following its introduction in January 2014, data collected from venues was aggregated to develop quarterly reports on alcohol sales data in the Kings Cross precinct. However, the evaluation found that the reliability of data used in these reports was affected by declining levels of compliance with the requirement and uncertainty around the quality of data supplied by low risk venues. If these issues are addressed and rectified, there may be value in publishing reports based on aggregated or de-identified data on the L&GNSW website. While no venues that responded to the venue survey believed such access to the data would benefit their venues, improvements to the quality of data and the format of reporting may assist stakeholders in better understanding trends in alcohol sales in the Kings Cross precinct. As an example, seasonal variations or changes in time of night sales may enhance stakeholder understanding of consumption patterns in the Kings Cross precinct. Furthermore, policy, compliance and business activities could potentially be better targeted if stakeholders had access to aggregated or de-identified alcohol sales data reports.

(c) Provide access to de-identified data files for analysis by bona fide research organisations

If the requirement was to be retained, a system should be designed to facilitate access to the alcohol sales data for research organisations. During the consultation period for this evaluation, several stakeholders suggested that in order for the data to have value there needs to be a mechanism for legitimate research organisations to gain access to the data. This would allow legitimate research organisations to undertake independent analysis of the data and possibly suggest valuable insights into patterns of alcohol consumption in the Kings Cross precinct. The evaluation therefore recommends providing access to de-identified data to bona fide research organisations for this purpose. Utilising a similar process to that followed by BOCSAR, L&GNSW could introduce a process whereby anyone wishing to gain access to the data must have ethics approval and submit a formal request outlining the reasons for the request and how the data will be used. Such requests would then be assessed by L&GNSW to determine whether or not access to the data is likely to be in the public interest.

(d) Exempt venues not categorised as “high risk” from the requirement

Smaller, lower risk venues experience a significant and disproportionate administrative burden in collecting and providing this data for little apparent benefit. In addition, feedback received during the consultation period indicated that stakeholders were uncertain about the quality of data provided by smaller, lower risk venues. There is a widespread perception that data from some of these venues is likely to be inaccurate and unreliable. Given this lack of trust in the quality of data from these venues, it is likely to be of little utility.

With these factors in mind, the evaluation recommends that should the Kings Cross alcohol sales data reporting requirement continue, it should be limited to high risk venues. In addition to accounting for the majority of alcohol sales in the precinct, high risk venues also report on an hourly basis which provides a more granular and useful picture of alcohol consumption in the precinct. If the data collection was limited to high risk venues, it would also help to address problems relating to data quality and compliance which disproportionately affect smaller, lower risk venues. While the alcohol sales data would not provide a complete picture of on-premises alcohol sales within the precinct, it would still allow for a detailed analysis of alcohol sales in high risk venues, venues in which the vast majority of alcohol-related offences occur.

(e) Remove the collection of data on energy drink sales from the requirement

The evaluation could not find any evidence for the energy drink data collected under the requirement being used to inform policy development or shape compliance efforts. The Australian Beverages Council also questioned the inclusion of energy drinks in the Kings Cross alcohol sales data collection, as energy drinks are non-alcoholic and contain no more caffeine than a cup of instant coffee, and have seen a significant decline in sales volumes since 2014. The Australian Beverages Council also argued that the cost of sales reporting for energy drinks acts as a disincentive for venues to stock energy drinks, unfairly impacting upon sales of this product.

In its submission, the Australian Beverages Council argued that there is a clear scientific consensus that the combination of alcohol and caffeine poses no particular risk in an on premises environment. For example, the Australian Beverages Council referred to the European Food Safety Authority’s (EFSA) 2015 scientific opinion of the safety of caffeine. The EFSA found that:

“Alcohol consumption at doses of up to about 0.65g/kg bw [body weight], leading to a blood alcohol content of about 0.08% - the level at which you are considered unfit to drive in many countries – would not affect the safety of single doses of caffeine up to 200mg. Up to these levels of intake, caffeine is unlikely to mask the subjective perception of alcohol intoxication”²².

²² European Food Safety Authority 2015, *EFSA Explains Caffeine Risk Assessment*, http://www.efsa.europa.eu/sites/default/files/corporate_publications/files/efsaexplainscaffeine150527.pdf

This opinion was further supported by the United Kingdom Committee on Toxicity which found that:

“Overall, the COT concludes that the current balance of evidence does not support a harmful toxicological or behavioural interaction between caffeine and alcohol”²³.

Given the lack of evidence for energy drink data having been used to inform policy development or shape compliance efforts, the evidence provided by the Australian Beverages Council in relation to the interaction of energy drinks and alcohol, and the lack of a clear rationale for the on-going maintenance of this requirement, it is recommended that the collection of data on energy drink sales be removed from the requirement.

(f) Simplify the format and categories for data collection in consultation with stakeholders

There are currently eight categories of beverage on which venues are required to report. The evaluation recommends reducing this number of categories to better reflect the data that may be valuable to government and simplify the reporting requirement for venues. While it is recommended that amendments to the drink categories be undertaken in consultation with industry if the requirement is retained, the evaluation recommends the following categories:

- ▲ Ready to drink (RTD)
- ▲ Spirits and liqueurs
- ▲ Full strength beer and cider
- ▲ Mid strength beer and cider
- ▲ Wine

The categories recommended for removal are:

- ▲ Energy drinks
- ▲ Spirits and liqueurs mixed with energy drinks
- ▲ RTD with greater than 5% ABV (alcohol by volume)

The recommended changes would remove unnecessary reporting of energy drinks, as discussed under recommendation 2(e), and combine reporting of RTD beverages. The rationale for combining the two RTD categories is that venues do not typically sell RTDs over 5%. Combining the two categories would make the requirement simpler without losing any granularity in the data. These changes would reduce the administrative burden on venues, reducing the number of data points that venues are required to report by more than a third, while still giving L&GNSW an accurate understanding of the amount of alcohol being sold in the precinct.

²³ United Kingdom Committee on Toxicity 2012, *Lay Summary to the COT statement 2012/04*, <https://cot.food.gov.uk/sites/default/files/cot/cotlaystatementcaffalco201204.pdf>

(g) Implement a better compliance and enforcement model to ensure that all required venues submit data for each quarter

Compliance data indicates that the percentage of venues that have supplied alcohol sales data to L&GNSW has decreased significantly over time. More specifically, the data shows that the percentage of venues submitting their data has fallen significantly since the time at which L&GNSW ceased issuing compliance notices for failing to comply with the requirement. This has significantly weakened the value of the data, as any aggregated data will only be based on data from some of the venues in the precinct and therefore will not reflect the total level of alcohol sales across the precinct.

If the requirement was to be retained, it would be necessary for a better compliance and enforcement model to be implemented to ensure that all required venues submit data for each quarter. It is noted that this would impose additional burdens on L&GNSW, particularly if collection beyond the Kings Cross precinct is pursued.

(h) Investigate potentially suitable online data collection systems in consultation with industry stakeholders, including the possibility of developing a secure online portal for the collection of alcohol sales data directly from point-of-sale systems

The current system of data collection requires venues to manually transfer their sales data into a formatted Microsoft Excel spreadsheet and send it to L&GNSW via email every quarter. The data is then individually uploaded into a Microsoft Access database maintained by L&GNSW from which it can be extracted for analysis. This process is time consuming and inefficient for both venues and L&GNSW.

If the requirement was to be retained, the evaluation recommends that L&GNSW investigate the possibility of developing a secure online portal for the collection of alcohol sales data directly from point-of-sale systems, in consultation with industry stakeholders. This would significantly improve the security of the data, minimise the collection burden on venues that operate such point-of-sale systems, and eliminate the manual processes currently undertaken by L&GNSW staff to collect and upload the data. While such a system would lead to significant improvements, the cost implications for venues and the Government of such an initiative would be likely to be significant. Collection may therefore need to be limited to larger, higher risk venues as smaller, lower risk venues may not have access to sophisticated point-of-sale systems.

(i) In consultation with other key government agencies, analyse alcohol sales data in conjunction with other relevant data sets

The usefulness of the Kings Cross alcohol sales data set could potentially be enhanced if it is analysed in conjunction with other relevant data sets. Although few stakeholders expressed interest in accessing alcohol sales data, some stakeholders identified potential uses for the data. As noted in this report, BOCSAR has indicated that alcohol sales data can be used for policy research by further exploring the relationship between alcohol sales and harm, or evaluating the impact of interventions introduced by the Government. The NSW Ministry of

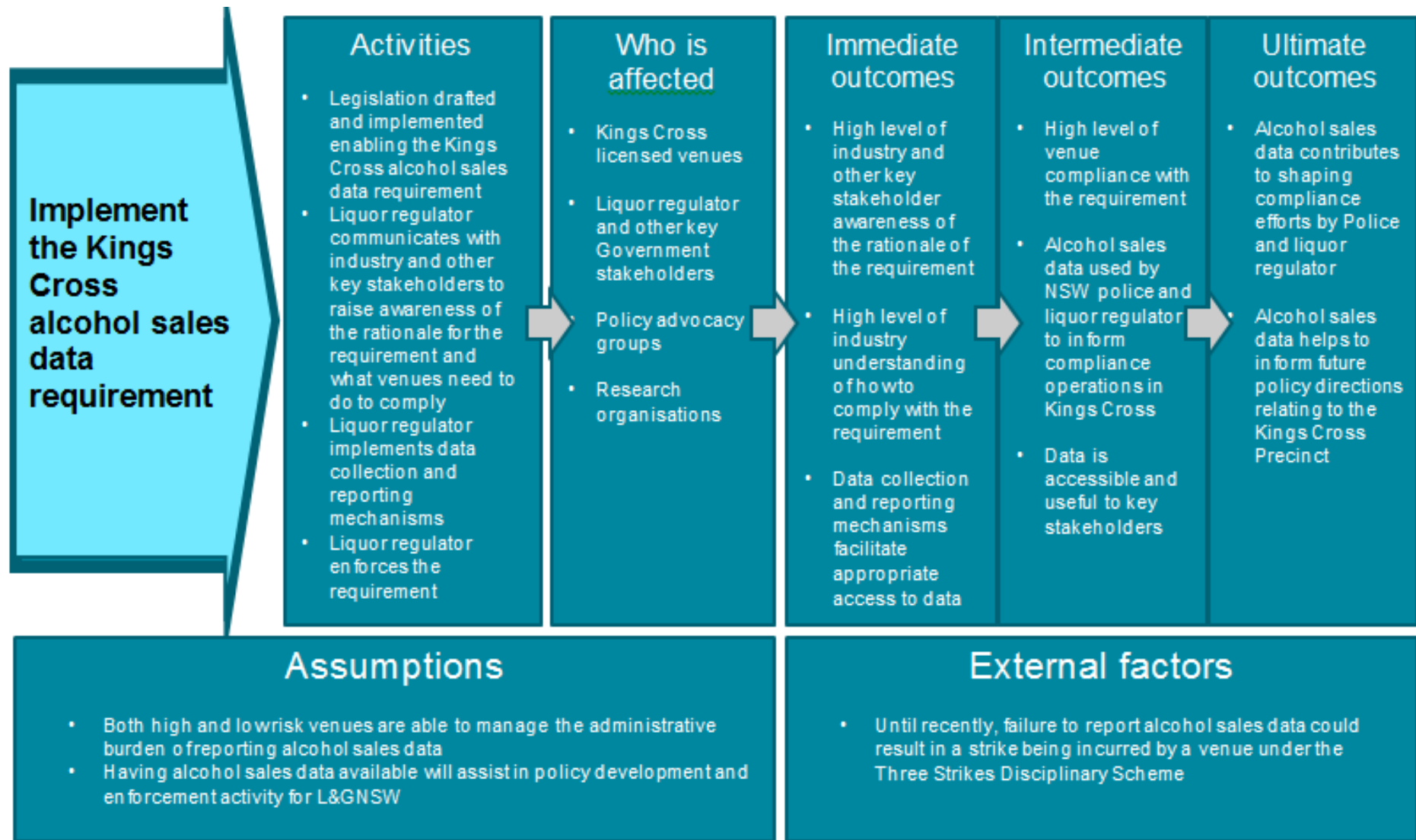
Health did not identify specific uses for the data, however noted that it may be possible to analyse alcohol sales data in conjunction with data sets maintained by Health to determine whether there are correlations between alcohol consumption and short-term health-related harms.

It is therefore recommended that L&GNSW, in consultation with other Government agencies, consider analysing alcohol sales data in conjunction with other relevant data sets if the requirement was to be retained. Agencies would need to identify existing data sets and the appropriate skills and resources would need to be available for such cross-agency data analysis. While data limitations may limit the insights that may emerge from this approach, it is recommended that the possibilities for such analysis be fully explored if the requirement is retained.

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Appendix A: Program logic model



Appendix B: Discussion paper



Justice
Liquor &
Gaming NSW

Evaluation of the Kings Cross alcohol sales data requirement

Discussion Paper

About this paper

This discussion paper contains information relating to the evaluation of the alcohol sales reporting requirement for licensed venues in the Kings Cross precinct. It has been prepared by Liquor & Gaming NSW (L&GNSW) to inform interested stakeholders about the objectives of the requirement, scope of the evaluation process, and how they can provide feedback to the evaluation.

About our evaluation

The purpose of the evaluation is to:

- ▲ determine if the Kings Cross alcohol sales data requirement is meeting its policy objectives and delivering a net benefit
- ▲ examine the availability and utility of the data to Government, industry, researchers and other stakeholders
- ▲ examine the appropriateness of the frequency, format, and nature of the alcohol sales data required to be provided by venues
- ▲ examine the quality and reliability of data supplied by venues and consider what strategies would be needed to address any shortcomings that are identified
- ▲ examine the extent to which the requirement imposes a regulatory burden upon venues and consider ways in which any burden may be reduced
- ▲ examine the level of understanding by venues of the rationale for the requirement and how to comply
- ▲ measure the level of compliance by venues with the requirement, the reasons for any non-compliance, and any challenges that venues may be experiencing in meeting the requirement
- ▲ consider other impacts of the Kings Cross alcohol sales data requirement.

The evaluation will focus upon the requirement for licensees to provide alcohol sales data. It is not an analysis of what the data reveals about alcohol sales in Kings Cross.

Next steps

L&GNSW will assess the value and outcomes of this requirement by considering the submissions received, feedback obtained through the consultation process, and other relevant information. Recommendations will then be made on potential future requirements relating to the data.

More information

Information about this evaluation, including this discussion paper and ways to provide feedback, are available on the [L&GNSW website](#).

Your feedback

You may be interested in sharing your views about this evaluation if you are a:

- ▲ licensee or manager of a Kings Cross venue required to supply alcohol sales data
- ▲ liquor industry body that represents Kings Cross venues required to supply alcohol sales data
- ▲ government, liquor industry, business, community or research organisation that may be able to use Kings Cross alcohol sales data.

L&GNSW is seeking your feedback on the Kings Cross alcohol sales data requirement until Sunday, 9 April 2017.

Ways to submit feedback

Preparing a written submission

You can email a written submission to alcoholsales.evaluation@justice.nsw.gov.au.

Submissions will be published on the L&GNSW website after the closing date unless you request otherwise.

Targeted questions on pages 5-6 have been developed to help you prepare your response.

Other ways to have your say

Kings Cross venues

An [online survey](#) is available if you are a licensee or manager of a Kings Cross venue and want to share your views about the alcohol sales data reporting requirement.

Government, liquor industry, business, community and research organisations

As part of this evaluation, L&GNSW will consult peak industry bodies, policy advocates, research organisations and government sector stakeholders to collect their feedback and views. This will be considered in the final report.

Background

Collection of alcohol sales data is one of a number of alcohol regulatory measures included in a 2012 plan of management introduced in response to high levels of alcohol-related violence in the Kings Cross precinct.

The objectives of the alcohol sales data reporting requirement are to:

- help shape compliance efforts by the NSW Police and L&GNSW, and
- inform future policy decisions by the Government in relation to the Kings Cross precinct.

The data assists Liquor & Gaming NSW to understand the impacts of regulatory interventions in the Kings Cross precinct, and helps to inform broader policy development. For example, the data was used to inform the Callinan liquor law review and the Sydney Night-Time Economy roundtables in 2016, and has also been used to inform internal Liquor & Gaming NSW policy development.

While Liquor & Gaming NSW has not published the data to date due to commercial and privacy requirements, the evaluation will consider the issue of future stakeholder access to the data.

The alcohol sales data reporting requirement applies only in Kings Cross. Alcohol sales data is not required to be reported elsewhere in NSW.

Reporting requirements for Kings Cross licensed venues

The Kings Cross alcohol sales data requirement took effect on 1 January 2014. Since then, all licensed venues in the Kings Cross precinct that sell or supply alcohol for consumption on the premises between 8pm and 5am have been required to submit quarterly alcohol sales data to L&GNSW in an approved format (clause [53O](#) of the Liquor Regulation 2008). Venues must complete an [approved form](#) (in Microsoft Excel format) for each quarter, and submit this to L&GNSW within 21 days of the end of each quarter. The form requires venues to report on the volume of alcohol sold in millilitres, with breakdowns for the following drink categories:

- Full strength beer and cider (>3.5% ABV²⁴)
- Light/mid strength beer & cider (≤3.5% ABV)
- Ready to drink (≤5% ABV)
- Ready to drink (>5% ABV)
- Wine
- Spirits & liqueurs (mixed with energy drink)
- Spirits & liqueurs (all other sold/supplied)
- Energy drinks

²⁴ ABV = alcohol by volume.

Licensed venues must report alcohol sales volumes between 8pm and 5am each night of the week. [High risk](#) venues must report alcohol sales volumes on an hourly basis, while other venues are only required to report total daily alcohol sales volume over the duration of this period. The more limited reporting requirements for low risk venues were introduced from the quarter ending 31 December 2014 to reduce the reporting burden on these premises.

Alcohol sales data reporting and situation in other jurisdictions

The Kings Cross alcohol sales data reporting requirement was developed by the NSW Government with reference to contemporary standards and practices in liquor regulation (informed by research literature), and to reporting requirements that apply elsewhere.

For example, Rankin and Livingston (2016) have argued that retail sales data, as opposed to wholesales sales data, provides the most detailed and timely record of consumption as it is captured at the moment that alcohol is sold to the public.²⁵ Further, the World Health Organisation (WHO) notes that retail alcohol sales data is the most reliable and accurate source of information about alcohol consumption on a per capita basis.²⁶

However, there is a range of regulatory and compliance costs associated with the provision and collection of alcohol sales data – whether at the retail or wholesale level – and these are an important factor in developing regulatory policy in this area.

Table 1 shows the approach of other states and territories in Australia to the collection of jurisdiction-wide alcohol sales data. It can be seen that collection occurs at the jurisdictional-wholesale level only where sales data is collected.

²⁵ Rankin, G & Livingston, M. (2016). *Understanding alcohol sales data in Australia*. Canberra: Foundation for Alcohol Research and Education.

²⁶ World Health Organization. (2000). *International guide for monitoring alcohol consumption and related harm*, <http://apps.who.int/iris/handle/10665/66529>

Table 1: Jurisdiction approaches to alcohol sales data reporting

State	Collection method	Frequency	Notes
Vic	Wholesalers and producers report on alcohol sales to licensed premises by alcohol type, volume and dollar value	Annually	Some small businesses are exempt from the requirement
QLD	Wholesalers, producers and merchants report on alcohol sales to licensed premises by alcohol type and volume	Annually	
WA	Wholesalers and producers report on alcohol sales to licensed premises by alcohol volume and dollar value	Annually	
Tas	To be determined	To be determined	Data collection is not expected to commence until 1 July 2017
ACT	Wholesalers report on alcohol sales to licensed premises by alcohol type and volume	Annually	
NT	Wholesalers report on alcohol sales to licensed premises by alcohol volume	Quarterly	
SA	N/A	N/A	SA does not collect alcohol sales data

Key issues for comment

The topics and targeted questions below can help you provide useful feedback and assist the evaluation:

1: Availability and usefulness of the data to stakeholders

- ▲ To what extent, and how, is the data made available to stakeholders?
- ▲ How could access to the Kings Cross alcohol sales data be improved?
- ▲ Have Government, industry, researchers and other key stakeholders used the data? If so, how? If not, why not?
- ▲ How could the data be made more useful?

2: Appropriateness of the frequency, format, and nature of the data collection

- ▲ What is the optimal frequency of data reporting?
- ▲ What is the most appropriate format for data reporting?
- ▲ What is the most appropriate and useful level of detail for data reporting?
- ▲ Does the requirement for hourly reporting for high risk venues and daily reporting for other venues meet the data needs of stakeholders? If not, what other reporting arrangements would meet these needs?

3: Quality and reliability of alcohol sales data supplied by venues

- ▲ What data quality issues, if any, affect the Kings Cross alcohol sales data?
- ▲ How could the quality and reliability of data supplied by venues be improved?

4: Regulatory burden of the reporting requirement on venues

- ▲ To what extent, and in what ways, does the requirement impose a regulatory burden on venues?
- ▲ How could the regulatory burden on venues be minimised?

5: Venue understanding of the rationale for the requirement and how to comply

- ▲ Have Kings Cross venues been provided with sufficient education and support to help them comply with the requirement?
- ▲ How well do venues understand how to comply with the requirement?
- ▲ How well do venues understand the rationale for the requirement?

6: Venue compliance with the requirement

- ▲ What is the rate of venue compliance with the requirement, including timeliness of delivery, and how has this changed over time?
- ▲ What types of venue tend to be less compliant with the requirement, and what are the reasons for this?
- ▲ What challenges, if any, are venues experiencing in meeting the requirement?
- ▲ To what extent do various types of enforcement action for failure to supply alcohol sales data influence rates of compliance?

7: Other impacts of the requirement

- ▲ Are there any other impacts or unintended consequences of the Kings Cross alcohol sales data collection?
- ▲ Are there any improvements that can be made to the administration and enforcement of the requirement?
- ▲ Are there any lessons that can be learned from alcohol sales data collections in other jurisdictions?
- ▲ What are the potential benefits, if any, of extending the alcohol sales data requirement beyond the Kings Cross precinct?
- ▲ What are the potential administrative costs and regulatory burdens associated with extending the alcohol sales data requirement beyond the Kings Cross precinct?
- ▲ If extension of the requirement beyond the Kings Cross precinct is to be considered, to which venues should the requirement apply and, if it only applies to a sub-group of venues, what are the limitations of restricting the collection to this sub-group?

8: Value of the Kings Cross alcohol sales reporting requirement

- ▲ Has the requirement helped to shape compliance efforts by NSW Police and Liquor & Gaming NSW in relation to the Kings Cross precinct?
- ▲ Do the benefits of retaining the regulatory requirement outweigh the administrative costs and regulatory burden for business and L&GNSW?

Appendix C: Stakeholders that lodged a written submission

- ▲ Australian Beverages Council
- ▲ NSW/ACT Alcohol Policy Alliance
- ▲ Potts Point Partnership
- ▲ Restaurant & Catering Australia

Appendix D: Venue survey

Kings Cross alcohol sales data venue survey

Background

This survey is only intended for Kings Cross Precinct venues which have a requirement to complete alcohol sales data reporting.

Liquor & Gaming NSW is currently evaluating the alcohol sales data reporting requirement for Kings Cross venues. It is a legislative requirement for licensed venues in the Kings Cross precinct to report on alcohol sales between 8pm and 5am for each quarter of the year. The purpose of this requirement is to help Liquor & Gaming NSW and Police shape compliance activity in the Kings Cross precinct. Alcohol sales data also helps Government make policy decisions about the Kings Cross precinct.

The purpose of this survey is to collect feedback from licensed venues in the Kings Cross precinct about the alcohol sales reporting requirement. In particular, Liquor & Gaming NSW is collecting feedback from venues on:

- the appropriateness of the frequency, format and nature of data collected
- the extent to which the alcohol sales data requirement imposes a regulatory burden on venues
- the quality and reliability of data collected
- whether the rationale for the requirement is understood
- whether there is adequate information and support available to venues about the requirement.

Your feedback will help to inform Liquor & Gaming NSW's evaluation of the alcohol sales data requirement.

This survey is voluntary and the data collected will only be used to inform the review. Your responses will be kept confidential. When reporting survey findings, individuals and individual venues will not be named. Survey data will only be presented in aggregate form in the evaluation report.

If you wish to provide more detailed comment on the Kings Cross alcohol sales data requirement, please send your submission to Liquor & Gaming NSW (email: alcoholsales.evaluation@justice.nsw.gov.au).



1. What type of licence does your venue hold?

- Hotel licence
- On-premises licence

2. How would you rate your venue's level of understanding of the alcohol sales reporting requirement?

Very low	Low	Moderate	High	Very high
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. How would you rate your venue's level of understanding of the purpose of the alcohol sales reporting requirement?

Very low	Low	Moderate	High	Very high
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Do you feel there has been enough support provided by Liquor & Gaming NSW to ensure your venue's understanding of the alcohol sales reporting requirement? If not, why not? Please provide details in the box below.

- Yes
- No

Please provide details here:

5. Would your venue benefit from having access to summary data from the Kings Cross alcohol sales data collection? If so, please provide details in the comments box below as to how your venue would use the data.

- Yes
- No

Please provide details here:

6. High risk venues are required to report on alcohol sales on an hourly basis while all other venues are required to report on alcohol sales on a daily basis. Which of these requirements applies to your venue?

- Report on an hourly basis (high risk venue)
- Report on a daily basis (not a high risk venue)
- My venue is not required to report on alcohol sales

7. Do you consider the reporting requirements for high and low risk venues to be appropriate? Why or why not? Please provide details in the comments box below.

- Yes
- No

Please provide details here:

8. Venues that sell or supply alcohol for consumption on the premises are required to report on the volume of alcohol sold for each of the following drink types:

- Light and mid strength beer and cider ($\leq 3.5\%$ ABV)
- Full strength beer and cider ($> 3.5\%$ ABV)
- Wine
- Ready to drink ($\leq 5\%$ ABV)
- Ready to drink ($> 5\%$ ABV)
- Spirits & liqueurs (sold/supplied mixed with energy drink)
- Spirits & liqueurs (all other sold/supplied)
- Energy drinks

Do you think these drink type categories are the most appropriate? If not, why not?
Please provide details in the comments box below.

- Yes
- No

Please provide details here:

9. Venues are required to report on alcohol sales daily or, in the case of high risk venues, hourly for each quarter of the year. What do you consider to be the most appropriate level of detail for alcohol sales data reporting and why? Please provide additional details in the comments box below.

- Overall volume of alcohol sold per day
- Overall volume of alcohol sold per hour
- Volume of alcohol sold by drink type per day
- Volume of alcohol sold by drink type per hour
- Other (please specify in comments box below)
- Overall volume of alcohol sold per hour

Please provide additional details here:

10. What challenges (if any) has your venue experienced in completing quarterly alcohol sales data reports? Please select the most significant challenge, if any, or up to three if more than one significant challenge was experienced. Please provide additional details about any of the challenges your venue has experienced in the comments box.

- Monitoring the exact volume (in millilitres) of alcohol sold
- Monitoring the volume of alcohol sold for each drink type
- Administrative costs associated with completing the reports
- Resources (including staff) required to complete the reports
- Time required to complete the reports
- Completing reports in the required format
- Submitting reports on a quarterly basis
- Submitting reports within the specified time frames
- My venue has not experienced any challenges
- Other (please provide additional details in the comments box below)

Please provide additional details here:

11. In your opinion, is the alcohol sales data supplied by your venue reliable?

Yes

No

Please provide additional details here:

12. How helpful are the instructions provided on the alcohol sales data form?

Not at all helpful

Not very helpful

Quite helpful

Very helpful

13. How satisfied or dissatisfied is your venue with the format of alcohol sales data reporting?

Very dissatisfied

Dissatisfied

Neither satisfied
nor dissatisfied

Satisfied

Very satisfied

14. Do you have any suggestions on how the format of alcohol sales data reporting could be improved? Please provide additional details in the comments box below.

Yes

No

Please provide additional details here:

15. On average, how long (in total) does it take your venue to complete the quarterly alcohol sales data report?

- Less than 2 hours
- 2 to <4 hours
- 4 to <6 hours
- 6 to <8 hours
- 8 to <10 hours
- 10 to <12 hours
- 12 to <14 hours
- 14 to <16 hours
- 16 to <18 hours
- 18 to <20 hours
- 20 or more hours

16. How often do you think alcohol sales data reports should be completed and submitted?

- Once a month
- Once a quarter
- Twice a year
- Once a year
- Never
- Other (please specify)

17. Do you think that the alcohol sales data requirement has had a positive or negative impact on your venue? Please provide additional details in the comments box below.

- Positive impact
- Negative impact
- Neither positive nor negative impact

Please provide additional details here:

18. Do you think the penalties for non-compliance are appropriate?

- Yes
- No

Please provide additional details here:

19. Do you have any other comments about the alcohol sales reporting requirement?

Appendix E: Questions asked of other jurisdictions

1. Is there a regulatory requirement for licensees to report alcohol sales data to the Government in your jurisdiction?
 - If so, what are the objectives of collecting this data?
 - If not, what information, if any, is currently available on alcohol sales in your jurisdiction?
2. What are the reporting requirements for licensees (if any)?
 - Which licence types does the requirement apply to?
 - How often do licensees report on alcohol sales? (e.g. annually, monthly, quarterly).
 - What are licensees required to report on?
3. How is alcohol sales data collected in your jurisdiction?
 - What are the methods used?
 - Have you had any feedback from licensees about these methods?
4. Have you experienced any issues with the quality of data supplied by licensees? If so, please explain the issues you have experienced.
5. How have licensees responded to the requirement to report on alcohol sales?
 - Do licensees comply with the requirement to report on alcohol sales?
 - How is the requirement enforced?
 - Are there any penalties for non-compliance?
6. How does your agency use the data?
7. Who can access alcohol sales data and how do they access it?
8. Who are the stakeholders accessing alcohol sales data?
 - What are the benefits to these stakeholders (if any) in accessing this data?
9. Are there any other issues your jurisdiction has experienced in collecting or using alcohol sales data?
10. Are any changes to the requirements relating to alcohol sales data collection in your jurisdiction anticipated over the next 12 months?