



Ms Natasha Mann
Executive Director
Regulatory Policy, Strategy & Support Branch
Liquor and Gaming NSW
Level 16, 323 Castlereagh Street
SYDNEY NSW 2000

4 August 2017

Dear Natasha,

Review of the club amalgamation and de-amalgamation framework

The Independent Liquor and Gaming Authority (the Authority) welcomes the opportunity to provide a response to the framework review of registered club amalgamations and de-amalgamations under the *Registered Clubs Act 1976*.

The Authority notes that the objective of this review is to ascertain whether current club amalgamation and de-amalgamation processes are meeting their objectives and to identify opportunities for improvement.

The Authority wishes to specifically comment on the final step of both the amalgamation process and de-amalgamation process, which involves applying to the Authority to transfer the club licence under section 60 of the *Liquor Act 2007*.

As part of these processes, a legislative checklist is submitted by an applicant to explain how relevant provisions of the *Registered Clubs Act 1976* and *Registered Clubs Regulation 2015* have been complied with. Currently there is no requirement for this checklist to be verified independently, for example by an accounting firm. The Authority considers that an independent verification is a critical element that is missing, which would strengthen the processes.

Thank you for the opportunity comment.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Philip Crawford'.

Philip Crawford
Chairperson

For and on behalf of the Independent Liquor and Gaming Authority