# Submission to the SA Review of Codes of Practice

This submission was prepared by FARE in response to the South Australia (SA) Review of the the *General Code of Practice* and *Late Night Trading Code of Practice* under the *Liquor Licensing Act 1997*. The document provides a total of 12 recommendations for strengthening the Codes to ensure that they are an effective regulatory tool in reducing the harm caused by alcohol.

## Recommendations

1. That the Late Night Trading Code of Practice and General Code of Practice be amended to make harm minimisation the primary purpose of the Codes, with all other purposes subordinate.
2. That the mandatory nature of Late Night Trading Code of Practice and General Code of Practice limit exemptions to ensure broad coverage of the Codes and maximise their effectiveness.
3. That the Late Night Trading Code of Practice and General Code of Practice are adequately enforced and penalties applied quickly and consistently for breaches of the Codes.
4. That the General Code of Practice be amended to require licensees and staff to undertake Responsible Service of Alcohol training every five years as a minimum.
5. That the Late Night Trading Code of Practice and General Code of Practice include the current restrictions on the sale and supply of beverages promoting rapid or excessive consumption and apply these to all on-licence venues at all times, not just to those trading after 4:01am.
6. That the Late Night Trading Code of Practice and General Code of Practice include additional measures to reduce the excessive and harmful consumption of alcohol and support the Responsible Service of Alcohol in on-licence venues including:  
   i. prohibiting the sale of shots, mixed drinks with more than 30ml of alcohol and ready to drink beverages stronger than five per cent alcohol by volume after 10pm  
   ii. placing a limit of four drinks on the number of drinks a person can purchase at one time after 10pm  
   iii. prohibiting the sale of alcohol mixed with energy drinks after midnight, and  
   iv. stopping the sale of alcohol 30 minutes before closing.
7. That the Late Night Trading Code of Practice be amended to apply to all venues that trade after midnight.
8. That the Late Night Trading Code of Practice requirement for Drink Marshals apply for all venues trading after 12 am.
9. That the Late Night Trading Code of Practice introduce a lockout from 1am and closing time of 3am.
10. That the General Code of Practice clearly defines the four levels of risk: ‘low risk’, ‘medium risk’, ‘high risk’ and ‘unacceptable risk’.
11. That the General Code of Practice clearly defines the term ‘reasonable steps’.
12. That Controlled Purchase Operations be introduced to ensure compliance with the provisions relating to the supply of alcohol to minors in the General Code of Practice and the Liquor Licensing Act 1997, with harsh penalties for non-compliance.

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