

Submission on the ACT Liquor Amendment Bill 2025

November 2025



About FARE

The Foundation for Alcohol Research and Education (FARE) is the leading not-for-profit organisation working towards an Australia free from alcohol harms.

We approach this through developing evidence-informed policy, enabling people-powered advocacy and delivering health promotion programs.

Working with local communities, values-aligned organisations, health professionals and researchers across the country, we strive to improve the health and wellbeing of everyone in Australia.

Community voices should be elevated in discussions about laws, policies and programs that impact on their health and wellbeing. This is why we work alongside people who have a lived experience of alcohol harm and communities disproportionately impacted by alcohol harm to create change.

To learn more about us and our work visit www.fare.org.au.

You can get in touch via email at info@fare.org.au

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Executive summary

All people in the ACT should have the opportunity to be healthy, safe and free from the many ways that alcohol causes harm to people, families and communities. Yet alcohol continues to contribute to chronic diseases like cancer; to domestic, family and sexual violence; disability; homelessness; self-harm and suicide. Tragically, Australia has recently been experiencing the highest rates of alcohol-induced deaths in over 20 years.¹ Alcohol is no ordinary commodity, it is a harmful product, and its harmful impacts intersect and interact in complex ways.

The ACT needs effective regulatory controls to address and reduce these harms. However, the laws that exist to keep people safe and protect them from harm have not kept pace with the way that alcoholic products are marketed, sold and delivered. Online sale and delivery of alcohol (OS&D) has proliferated in recent years, particularly since COVID-19, exposing the community to greater risks and harms.

Recent reviews of measures to prevent domestic, family and sexual violence in Australia have specifically recommended actions on alcohol regulation, emphasising that alcohol is a significant contributor to gender-based violence in Australia, increasing its frequency and severity. The Federal “Rapid Review of Prevention Approaches to End Gender-Based Violence” (*Rapid Review*) and the South Australian Royal Commission on Domestic Family and Sexual Violence (SA Royal Commission) have both made key recommendations for reform, including in the area of OS&D of alcohol, some of which are adopted in the ACT Government’s Liquor Amendment Bill 2025.

These reforms should be supported and implemented without delay to help keep women and children safe, and to demonstrate the way for other States and Territories by following a best-practice and evidence-based approach. It is vital that the reforms follow the evidence and recommendations of expert bodies such as the *Rapid Review* expert panel and the SA Royal Commission.

The Bill also introduces other positive measures – such as age verification for online sales of alcohol, ID checks, new offences for delivery of alcohol to a person under 18, etc – which should also be supported, but can, in some cases, be improved.

The Bill does, however, ignore a key recommendation of the *Rapid Review* and SA Royal Commission: that is to make **harm minimisation the primary / paramount object** of the Liquor Act and to include “gendered violence” in its definition. This provides clarity of purpose, removes the conflict with competing objects in the Act, and confirms that preventing harm is the most important object.

The Bill can also be improved by extending protections beyond ‘**same day**’ delivery, which has the same risks as non-same day delivery, and adopting further relevant and important reforms to properly regulate online sale and delivery, such as establishing an OS&D license category (which includes a requirement for community consultation), risk ratings and fees and implementing OS&D test purchasing to ensure compliance efficacy of the reforms.

We thank the ACT Standing Committee on Legal Affairs, for the opportunity to provide a submission on this Bill. FARE also requests the opportunity to appear before the Committee when it holds an in-person hearing.

Recommendations

Please note Section (“s”) numbers refer to the *ACT Liquor Act 2010* unless otherwise noted.

FARE recommends:

1. Introduction and context

Recommendation 1. Pass the Liquor Amendment Bill 2025.

2. Improve the objects and scope

Recommendation 2. Amend the bill to prioritise harm minimisation above other considerations, by making it the paramount Object in s9, and include gender-based violence in the definition of alcohol harms in s10 ‘*Harm minimisation and community safety principles*’.

Recommendation 3. Change the scope of measures in the Bill to apply to all online sales and delivery of alcohol, not just “same day” delivery.

3. Support late night and rapid delivery reforms

Recommendation 4. Support the establishment of a delivery timeframe from 10am to 10pm and specify the window can be narrowed but not widened. The delivery limits should apply to all deliveries of alcohol, not just same day.

Recommendation 5. Support the establishment a 2-hour safety pause and specify that 2-hours is the “minimum” restriction (ie at least 2 hours). Monitor and research the exemption and ensure it is not undermining the efficacy of the safety pause.

4. Support ID checks, new offences and training

Recommendation 6. Support requirements for digital proof of age and proof of age on delivery. Production of ID should be required for every delivery. The requirements should apply to all sales of alcohol, not just same day delivery.

Recommendation 7. Support the offence of delivering alcohol to a person who is intoxicated, and the requirement for delivery staff to undergo *delivery-specific* Responsible Service of Alcohol (RSA) training – which includes domestic and family violence training. These should apply to all deliveries of alcohol, not just same day.

Recommendation 8. Support the ability for people to opt-out of direct advertising and marketing, and to opt out of delivery of alcohol – but extend this to all alcohol advertisements and deliveries, not just same day.

Recommendation 9. Enact further marketing and advertising restrictions, including banning unacceptable marketing practices of alcohol, restricting digital marketing practices such as buy now buttons, and requiring alcohol companies with online advertising to display prescribed health warning statements.

5. Compliance and liability issues

Recommendation 10. Ensure the protections in the Bill are effective by expanding the current program of compliance tests to include online sale and delivery of alcohol, and funding Access Canberra to specifically monitor and enforce changes in the Bill.

Recommendation 11. Amend the requirements for retailers to collect data and keep records to specify this includes volume of alcohol sold online as well as delivered geographically. ACT Government should publish regular sales and delivery data reports, including of refusal incidents, to enable research and compliance monitoring.

Recommendation 12. Clarify in the Bill that delivery companies are liable for delivery breaches, such as delivery to children or people who are intoxicated.

6. Licencing and risk factors

Recommendation 13. Amend the s16 to s21, to establish a separate, specific liquor licence category for OS&D. Require retailers, such as bottle shops and third-party delivery companies, to have and display this license to sell alcohol online or to deliver alcohol.

Recommendation 14. Improve community impact processes in the Liquor Act, including publishing full licence applications with risk-assessment management plans and, resourcing independent support for members of the public impacted by increases in alcohol supply density.

Recommendation 15. Amend s229 to establish a risk-factor for online sales and delivery to accurately reflect the increased risk of harms. Amend s229 to incorporate a risk factor for supply density (as an equivalent for outlet density) for online sales and delivery of alcohol in a geographic area. Consult alcohol policy experts on the development, implementation and evaluation of such a risk factor.

1. Introduction and context

Significant and increasing harms from alcohol

Alcohol causes significant harm to Australians, with one person dying every 90 minutes and one person being hospitalised every three minutes because of alcohol.² As well as contributing significantly to Australia's health burden, alcohol costs billions of dollars each year in Australia in terms of healthcare and non-healthcare economic costs.³ Tragically, Australia has recently been experiencing the highest rates of alcohol-induced deaths in over 20 years.⁴

Nearly 100 people in the ACT die each year of alcohol-attributable disease and injury, and more than 1,500 hospitalisations in the ACT are attributable to alcohol.⁵ Over a fifth (21.3%) of people in the ACT exceed single occasion alcohol risk guidelines. Alcohol is the most common drug that people in the ACT seek treatment for (44%).⁶

A recent *Harms to Others* study shows that alcoholic products also cause harm to the broader community. In the survey of over 2,500 adults, participants were asked about the impacts of alcohol use by people they interacted with – friends, housemates, strangers, partners, family members and colleagues.⁷ Nearly half (48%) said they had experienced harm from another person's drinking, while 7.5% reported having been “*harmed substantially*”. This equates to almost 10 million adults a year harmed by others' alcohol use and more than 1.5 million experiencing serious harm.

Background to the key reforms: a national commitment to act on domestic, family and sexual violence (DFSV)

The key reforms in the Bill which limit the availability of alcohol into the home will prevent family and domestic violence, and other harms. They should be seen and understood in this context. This is why the reforms are recommended by bodies such as the South Australian Royal Commission on Domestic, Family and Sexual Violence (SA Royal Commission) and the Federal *Rapid Review* expert panel on prevention approaches (*Rapid Review*). They are supported by women's and domestic violence advocacy bodies such as Domestic Crisis Service Centre Canberra, locally, and Our Watch⁸, nationally, as well as by people with lived experience.

Alcohol is a significant enabler and exacerbator of domestic, family and sexual violence (DFSV). There are correlations between men's heavy episodic drinking and frequency or severity of violence against women.⁹ Alcohol is estimated to be involved in between 23% and 65% of all family violence incidents reported to police.¹⁰ Over 60% of males who killed a female intimate partner engaged in problematic drug and/or alcohol use in the lead-up to, or at the time of, the homicide (27% alcohol use only; 25% alcohol and drug use; 8.3% drug use only).¹¹

Men's drinking results in direct, indirect and hidden harms to women that are cumulative, intersecting and entrench women's disempowerment.¹² Changes in their partners' drinking play a central role in women's journey to safety and can complicate their ability to leave.¹³ Action on alcohol is an important part of any comprehensive approach to the prevention of violence against women and children.

The *Rapid Review* recognised that alcohol increases both the incidence and severity of physical and sexual violence within intimate relationships and families and that a failure to consider DFSV in alcohol policy has allowed unprecedented growth in alcohol availability, which has been statistically linked to increases in alcohol-related DFSV.

Key reforms in the Bill stem from the *Rapid Review* work. In recognising the role of alcohol in DFSV, the *Rapid Review* specifically recommended changes to State and Territory Liquor Acts

to help address this issue, including the regulation of online sale and delivery and of alcohol marketing. In September 2024, the Prime Minister, and all State and Territory First Ministers committed to take urgent national action to address gender-based violence, in line with the recommendations outlined in the *Rapid Review*.¹⁴

The SA Royal Commission repeated and elaborated on key recommendations from the *Rapid Review* when it reported in August 2025. The SA Royal Commission recommended specific changes to the South Australian Liquor Act to:

- Make harm minimisation the paramount objective of the Liquor Act.
- Ensure that alcohol can only be sold for delivery between 10am-10pm.
- Introduce a safety pause of two hours between when alcohol is ordered and delivered.

In formulating this recommendation, the SA Royal Commission drew on evidence from extensive community engagement, and observed that:

“The relationship between alcohol and drug use and domestic, family and sexual violence [in South Australia] has been a throughline observed by the Commission during its engagement with people with lived experience, people using violence, frontline workers and organisations.”

The *Rapid Review’s* recommendations, informed by the additional specifics of the SA Royal Commission (a two-hour safety pause between order and delivery, a 10am-10pm delivery window, and harm minimisation as the paramount objective in Liquor Acts), provide the best and clearest formula for State and Territory Liquor Act reforms.

The ACT Bill proposes to introduce two of these key recommendations – a two-hour safety pause between order and delivery and a 10am-10pm delivery window (but not the third, the amendment to the objectives - see Amendments to improve the bill, below).

The Bill also does not address, in any significant way, the *Rapid Review* recommendation to limit alcohol advertising. While there are broader, Federal alcohol marketing reforms needed, state and territory-based reforms can also be implemented by restricting practices like push notifications and buy-now buttons.

By implementing these key reforms, the ACT Liquor Amendment Bill 2025, if passed, will help reduce alcohol harm in the ACT and is a significant step towards meeting national commitments.

Recommendation 1. Pass the Liquor Amendment Bill 2025.

Additional harms from online sales and delivery of alcohol (OS&D)

Although family and domestic violence provides a very important context to these reforms, FARE emphasises that there are a range of harms connected to OS&D. As research conducted by The University of Queensland, The George Institute and FARE demonstrate: People likely experiencing alcohol dependency are twice as likely to have alcohol sold to them for rapid delivery to their home compared to those at low risk (55% vs 24%) - putting them at greater risk of harm (eg. Injury, memory loss and other health impacts).¹⁵

In a tragic example from Victoria, a woman named Ms Kathleen Arnold, passed away due to alcohol toxicity. Ms Arnold had 319 alcohol products delivered to her home in the six months before her death. The Victorian Coroner’s recommendations in response to Ms Arnold’s death included prohibiting home delivery of alcohol between 10pm and 10am and requiring a minimum two-hour delay between order and dispatch of alcohol for home delivery.¹⁶

Rapid expansion of OS&D

The reforms in the Bill are also proposed in the context of a rapid shift towards the home delivery of alcohol. Every phone is now a bottleshop. Online alcohol retail sales have almost quadrupled from 2012 (\$539 million) to 2022 (\$2.0 billion). The revenue from online alcohol sales is forecasted to grow at an annual rate of 10.6% by 2026-27.¹⁷ It is estimated that one in six Australians who drink alcohol, purchased it via delivery.¹⁸ Historically, regulations for the supply of alcohol in the ACT were designed for ‘bricks-and-mortar’ premises (ie. pubs, clubs, bars and bottle-shops) where there is greater regulation and oversight.

Research into the delivery of alcohol shows that alcohol is being left unattended, delivered to people under 18 years old,¹⁹ and to people who are intoxicated.²⁰ Alcohol is also being delivered into homes rapidly, which increase the risk of harm, through the extension of an existing alcohol session.²¹ Alcohol companies can now advertise a product through multiple digital platforms, push fast purchases via Apps or websites, and then deliver alcohol within two clicks and 20 minutes to many areas.

Need for regulation of OS&D

Governments need to ensure that alcohol companies comply with effective, evidence-based measures that achieve harm reduction policy objectives in this changed context. Across Australia, the regulation of OS&D has not kept pace with rapid changes in how alcohol is sold and delivered. Un-enforceable, voluntary, self-regulation codes of practice are without any real consequences and are inadequate and ineffective.

The harm minimisation measures required are shown in the diagram below:

1. Prevent late night (after 10pm) and rapid (less than 2-hour) delivery
2. Implement (sales and delivery) ID checks and offences
3. Prevent harmful marketing
4. Enforce compliance and data collection (sales and delivery)
5. Improve licencing and risk factors
6. Protect delivery staff, (not penalise drivers, delivery-specific RSA, companies liable)



Community support for OS&D reform

A further context for the Committee to consider is the fact that the public is strongly in support of key changes proposed in the Bill. Polling conducted in October 2025 shows that:²²

- 69% of people support limiting delivery of alcohol to between 10am-10pm (20% do not);
- 70% support a 2-hour pause between sale and delivery (17% do not)
- 83% of people believe reducing alcohol-related harms is the most important thing to consider when making rules and laws about alcohol (compared to supporting growth of the alcohol industry – 17%)

2024 polling of ACT residents also shows that:²³

- Nearly a third (32%) of ACT residents believe that the ACT Government is not doing enough to address harms from alcohol.
- 81% support ID being verified when placing an alcohol order and 78% support ID requirements at the point of delivery.
- 93% support strong penalties for companies that deliver alcohol to children and 66% for companies that deliver to people who are intoxicated.

In addition, regarding policy options on alcohol marketing (which are not covered in the Bill), most ACT residents are supportive of:

- Ensuring that children’s online activity (90%) and anyone’s online activity (75%) is not collected to market alcoholic products.
- Not allowing alcohol companies to send push notifications to a person’s phone, prompting them to purchase alcohol (84%).
- Implementing digital health warnings about the risks of alcohol on all alcohol retail websites (84%) and on online alcohol advertisements (84%).

Committee submissions including industry submissions

FARE expects that the Committee will receive submissions from the alcohol industry and their representatives opposing the reforms in the Bill, or seeking their relaxation, questioning the need for the reforms, questioning their effectiveness, and attempting to undermine evidence for the reforms.

On this point, FARE emphasises to the Committee that the key components of the Bill have their evidentiary foundation in work done by highly regarded bodies, such as the Federal *Rapid Review* panel of experts on the prevention of gendered violence, the SA Royal Commission, and the Victorian Coroner, who drew on extensive research evidence, the voices of people with lived experience, as well as tragic outcomes in the community where harm, injury and death have occurred.

Further, these are bodies whose remit and motivation is to make recommendations that will achieve better outcomes for the community as a whole and, unlike the alcohol industry, they have no conflict of interest between harm minimisation and business profit.

Extensive analysis and research has been conducted into the strategies of the alcohol industry and other harmful product industries. This research highlights tactics used to influence policymaking in their favour, at the expense of public health outcomes, including through the tactics the industry undertakes in Committee submissions. A 2023 analysis of alcohol industry submissions to Australia’s National Alcohol Strategy, for example, found that: *“the industry systematically manipulated, misused and ignored evidence throughout their submissions”*

The analysis concluded:

“It is therefore essential that industry submissions are scrutinised and not accepted on face value. Additionally, it is suggested that the alcohol industry requires a distinct model of governance similarly to that which regulates the tobacco industry to prevent their attempts to undermine evidence-based public health policy.”²⁴

2. Improve the objects and scope

Primary object of harm minimisation

The Bill fails to address a key recommendation of both the *Rapid Review* and the SA Royal Commission: that is to ensure harm minimisation (with the specific inclusion of gendered violence) is made the **primary / paramount object of the Liquor Act**. These bodies came to this conclusion because, as the *Rapid Review* report noted, there has been “a failure to consider DFSV in alcohol policy, which has allowed unprecedented growth in alcohol availability, both in the density of liquor outlets and the length of online delivery hours. This increase in availability has been statistically linked to increases in alcohol-related DFSV.”²⁵

This change would correct this historical failure and reduce harm by ensuring decisions about alcohol in the community rightly prioritise the prevention of community harm, rather than attempting a false balance with competing objectives such as development of industry and the nighttime economy – which is the current arrangement. These conflicting interests challenge the licensing authority’s interpretation of alcohol harm risks when deciding on matters put before it.

The change is a simple amendment which would specify that the objective of community safety and harm reduction, which specifically includes the prevention of gendered violence, is the paramount objective in the ACT’s *Liquor Act*.

Recommendation 2. Amend the Bill to prioritise harm minimisation above other considerations, by making it the paramount Object in s9, and include gender-based violence in the definition of alcohol harms in s10 ‘*Harm minimisation and community safety principles*’.

Scope: all sales and delivery of alcohol (not just same day)

The ACT *Liquor Act* does not currently reference alcohol delivery and while the measures begin to regulate alcohol delivery, key protections should not be limited to only one type of alcohol delivery (ie. “same day” delivery). Risks such as unattended, late night, intoxicated and underage delivery remain for non-same day delivery. Specific examples are discussed below.

Recommendation 3. Change the scope of measures in the Bill to apply to all online sales and delivery of alcohol, not just “same day” delivery.

3. Support late night and rapid delivery reforms

Limit late night delivery

The Bill’s proposal to limit delivery hours to 10am-10pm is an important measure to reduce harm in the home, and consistent with recommendations in the *Rapid Review* and SA Royal Commission. The increased availability of alcohol, especially late at night, increases the risk of harm.

For example:

- BOCSAR research shows that NSW saw an additional 1,120 domestic violence assaults after extending alcohol trading hours from 10pm to 11pm.²⁶
- Alcohol-related assaults increase substantially between 6pm and 3am, with 37% of these assaults occurring in the home and 57% of those being family violence.²⁷
- In addition, suicides and sudden or unnatural deaths involving alcohol predominantly happen at night, in the home environment, peaking late at night.²⁸

As noted above, late night delivery is a safety measure in the Bill that should apply to all deliveries of alcohol, not just same day.

FARE notes that the 10am-10pm window is specified in regulation and therefore could be amended easily. The Bill would be strengthened by specifying this delivery window could be narrowed (to, for example, 10am-9pm) but not expanded without a change to primary legislation.

Recommendation 4. Support the establishment of a delivery timeframe from 10am to 10pm and specify the window can be narrowed but not widened. The delivery limits should apply to all deliveries of alcohol, not just same day.

Prevent rapid delivery with a 2-hour safety pause

The proposed 2-hour safety pause is critical measure in the Bill that will prevent violence and stems from the recommendations of the *Rapid Review* and the SA Royal Commission. A minimum 2-hour safety pause was also recommended by a Victorian Coroner.²⁹

Alcohol delivery fuels higher risk alcohol use and contributes to people ‘topping up’ when they normally would have stopped drinking, increasing the likelihood of higher-risk alcohol use and harm. Evidence demonstrates that rapid delivery enables impulsive purchases and enables continuation of an existing alcohol session when the alcohol supply has been exhausted.

- 39% of people who reported using alcohol in the past 12 months had alcohol rapidly delivered into the home. 55% of people likely experiencing alcohol dependency were sold alcohol for rapid delivery compared to 24% at low risk of alcohol dependency.³⁰
- One in five Australian adults who use popular alcohol delivery sites used a service to continue a home drinking session.³¹
- Of people ordering rapid delivery, 38% drank more than 10 standard drinks on that occasion.³²
- 77% of people who ordered rapid delivery would have stopped if it was unavailable.³³

The Bill achieves the safety pause via s143N and Regulation s30B by creating an offence for delivering alcohol before the end of a 2-hour ‘*delayed delivery period*’ starting at the time of the order. However, the 2-hour time frame of the safety pause, as with the delivery window, is specified in regulation, making it easy to amend. The Bill would be strengthened by requiring the 2-hour pause to be a *minimum*, so that it could be longer (eg. 3 hours), but never less than 2 hours, without an amendment to the primary legislation.

The Bill also provides an exception to the 2-hour pause, which would allow alcohol to be delivered within 2-hours of the order, provided the amount paid for the liquor is not more than half of the total amount paid for the meal and liquor (disregarding any service or delivery fees). While FARE acknowledges that alcohol is often ordered with meals, and it is unreasonable to delay the delivery of a meal for 2-hours, it is also critical that this key safety measure — the 2-hour safety pause — is not undermined by a potential loophole. The meal / alcohol cost ratio obligation (alcohol cannot be more than half the cost of the meal and alcohol together) is likely an effective deterrent that would prevent many people from ordering a meal solely to have alcohol rapidly delivered. However, it may still be used as a loophole by some to circumvent the

2-hour safety pause. FARE suggests research, making use of sales data (see below), is utilised to examine the effectiveness of this exemption.

Recommendation 5. Support the establishment a 2-hour safety pause and specify that 2-hours is the “minimum” restriction (ie at least 2 hours). Monitor and research the exemption and ensure it is not undermining the efficacy of the safety pause.

4. Support ID checks, new offences and training

The Bill proposes several other safety measures to prevent alcohol being delivered in potentially harmful circumstances, such as to children, to alcohol free areas, unattended, and to people who are intoxicated. Currently these types of deliveries are all permitted in the ACT and can cause obvious harm. Alcohol companies have ineffective processes to ensure alcohol is not sold online or delivered to people who are intoxicated or to children, with research showing that companies and retailers are delivering alcohol to people who are intoxicated³⁴ and to young people³⁵ without adequate identification checks.

FARE supports the additional measures in the Bill which introduce further delivery protections, like those already introduced in several other jurisdictions; though we recommend improvements to some of these, by extending the protections to *all* home deliveries, rather than limiting the protections to “same day” deliveries (see recommended improvements, below). We provide the following additional commentary on these measures.

Effective ID checks at point of sale and point of delivery

FARE supports the requirement for digital proof of age, as an effective ID check for online point of sale. The Bill also provides for a delivery person to refuse delivery, however only if they first request an identification document, at their discretion. This makes this measure ineffective and places a difficult burden on drivers. A more effective measure is to require the production of ID for every delivery. This takes the onus off delivery drivers, and this requirement could also be specified to customers on the ordering platform, (eg. “I understand and agree that I must provide a valid ID on delivery, or the order cannot be left.”)

Recommendation 6. Support requirements for digital proof of age and proof of age on delivery. Providing ID should be required for every delivery. The requirements should apply to all sales of alcohol, not just same day delivery.

Responsible Service of Alcohol (RSA) training and offence of delivering alcohol to a person who is intoxicated

The OS&D of alcohol creates new risks of harms, including to delivery staff, through the delivery of alcohol to people who may be intoxicated.

- A 2022 study found that a quarter of respondents had alcohol delivered while intoxicated, 75% of whom were never or only sometimes refused delivery.³⁶
- 61% of Victorians using rapid delivery weekly said they were regularly intoxicated when receiving their alcohol delivery (and were still given the order).³⁷

Preventing the delivery of alcohol to a person who is intoxicated is an important safety measure, both for the person who is consuming the alcohol and for others in the household. Men’s heavy drinking exacerbates physical violence, leads to more intimate partner violence experienced by women, and to more severe injuries.³⁸ The person who is intoxicated is also at risk and, if requesting alcohol in a traditional “bricks and mortar” venue, would be refused service.

A tragic example of home delivery to a person who is intoxicated is seen in the tragic case of Kathleen Arnold (described above). In a statement to the Coroners Court, Ms Arnold’s mother wrote: “*The delivery services would not check her ID and she was visibly unsteady and unwell. Even when connected to medical equipment they would still deliver unless I intervened.*”³⁹

Responsible service of alcohol (RSA) training is only one element in preventing alcohol supply to children or people who are intoxicated. Despite the emphasis placed on mandatory RSA training across Australia, there is little evidence that training alone reduces the likelihood of sale of alcohol to people who are intoxicated.⁴⁰ It only has some effect when combined with strong regulation, compliance testing, penalties and strict enforcement. Current RSA training is designed for alcohol supply on premises, much of it is not appropriate for the delivery of alcohol.

Delivery-specific RSA needs to be designed, prescribed and monitored with record-keeping of refusals and test purchasing. The findings of the “*Review of the NSW Alcohol Delivery Reforms - Stage 1*” indicated drivers asked for more plain English, and more support with de-escalation and communication.⁴¹ Delivery staff need to be supported so that they understand their role, rights and responsibilities including with refusing delivery of alcohol. As home delivery involves delivery staff accessing people’s premises, delivery specific RSA training also needs to incorporate specific training on recognising and responding to domestic and family violence.

Recommendation 7. Support the offence of delivering alcohol to a person who is intoxicated, and the requirement for delivery staff to undergo *delivery-specific* Responsible Service of Alcohol (RSA) training – which includes domestic and family violence training. These should apply to all deliveries of alcohol, not just same day.

Support and improve advertising protections and “opt-out” requirements

FARE supports the measures in the Bill that require delivery providers to allow people to opt-out of direct advertising and marketing about of their services, and to opt out of same-day delivery of alcohol. As the ACT’s 2023 ‘Same-Day Delivery’ discussion paper noted, there are several “*potentially dangerous*” impacts of current online sale and delivery marketing practices. The subsequent Listening Report also noted the consultation clearly heard feedback from stakeholders in relation to the need for any reform in this space to also address marketing issues associated with SDD.

Digital marketing of alcohol is growing increasingly pervasive and targeted. A recent report released by FARE and VicHealth demonstrates that the extensive harvesting of people’s data is used to target marketing for harmful and addictive products like alcohol, including to children and people seeking help to cut back.⁴² People with high levels of alcohol use are likely to be the most exposed, including people trying to reduce their alcohol use or in recent recovery.

In these circumstances, and noting the significant harms of alcohol in the community, it would be appropriate for direct marketing and advertising about alcohol to be restricted unless a person opted *in*. In the least, the current scope of this restriction demonstrates why the Bill’s protections should extend beyond “same day” deliveries to apply to all deliveries. Under the current proposal, a person could opt out of “same day delivery” advertisements, but would still receive other alcohol advertisements, ie for alcohol that is delivered the next day, which significantly undermines the effectiveness of the provision.

Likewise, the ability to opt out of the “same-day” delivery of alcohol should be extended to allow people the ability to opt out of any delivery of alcohol.

Noting the pervasive and problematic nature of alcohol advertising – which the *Rapid Review* also recommended Governments take action to regulate – the ACT Government should include further protections in the Liquor Amendment Bill:

- Amending the *Liquor Regulations* s29 to specifically ban unacceptable marketing practices, including those listed in *Responsible Promotion of Liquor Guidelines* with appropriate penalties.
- Extending the list of unacceptable promotional practices to the digital marketing of online sale and delivery, including prohibiting retailers from offering delayed payment; sending direct prompts; ‘buy-now’ buttons or offering incentives for a minimum spend or volume.
- Amend the *Liquor Regulations* s29 to require alcohol companies with online advertising, to clearly display on their websites at least three prescribed rotating health warning statements about the risk of harm from alcohol, with a link to the Australian guidelines to reduce health risks from drinking alcohol.

Recommendation 8. Support the ability for people to opt-out of direct advertising and marketing, and to opt out of delivery of alcohol – but extend this to all alcohol advertisements and deliveries, not just same day.

Recommendation 9. Enact further marketing and advertising restrictions, including banning unacceptable marketing practices of alcohol, restricting digital marketing practices such as buy now buttons, and requiring alcohol companies with online advertising to display prescribed health warning statements.

5. Compliance and liability issues

Alcohol deliveries are private and difficult to monitor. This means that compliance testing is a key follow up to ensure these reforms are efficacious. Regulatory measures are only as effective as their corresponding compliance measures. Failure to provide follow-up oversight risks retailers failing to comply, the changes being ineffective, and a failure to reduce the harms associated with online sale and delivery.

FARE notes, for example, in the case of Ms Kathleen Arnold (cited above), the Victorian Coroner found that despite regulations in Victoria, alcohol was often delivered to Ms Arnold outside of legislated alcohol delivery hours, in excess of legislated delivery limitations, and without proper checking of identification ID.⁴³ In a statement to the Coroners Court, Ms Arnold’s mother wrote: “*The delivery services would not check her ID and she was visibly unsteady and unwell. Even when connected to medical equipment they would still deliver unless I intervened.*”⁴⁴

The ACT *Liquor Act* has detailed provisions for compliance tests / controlled purchase operations (CPOs) that involves a young person (a purchase assistant), under the supervision of an authorised person, purchasing, or trying to purchase, liquor from a licensee. It is done to obtain evidence that may lead to the prosecution of a person for the offence of supplying liquor to child or young person. This may involve the purchase assistant and the authorised person engaging in conduct that would normally be an offence against ACT law. The NSW government also used compliance test purchasing as part of its Stage 1 Review of Alcohol Delivery Reforms.⁴⁵ However, the Act does not contain any test purchasing measures for online sale and delivery and the Bill does not introduce this capability.

Accessible data and research evidence is also needed to be able to establish, maintain and enforce effective alcohol laws. Most of this data comes from alcohol companies, much of which is already collected while doing business, or reporting to their industry lobby groups. The

Online Sale and Delivery industry lobby group, Retail Drinks Australia, indicated they had access to sales data from nearly 9 million transactions.⁴⁶ This data is necessary for monitoring the compliance of refusals (under 18, unattended or intoxicated). While the Bill establishes the requirement for collecting and record-keeping of “supply” and “refusal to supply”, it does not clarify whether it includes both sales and delivery. It would be preferable for “supply” to include alcohol sold online as well as delivered by geographic area. FARE notes as well that s30D of the *Liquor Regulations* proposes collecting personal data, such as names and addresses of individuals, which raises privacy issues.

The training, education and support provided to delivery drivers is essential in ensuring the laws are effective, and that drivers are treated fairly. The shift from public, physical, licenced premises to a private, digital, unlicenced context creates unique risks for delivery staff.

FARE further notes that the ACT 2023 “Same Day Delivery” Discussion Paper proposed amending the ACT Liquor Act to clarify that delivery companies are liable for delivery breaches, such as delivery to children or people who are intoxicated: “Same day delivery providers will be liable for acts of employees and agents with appropriate exemptions”. This measure does not appear in the Bill

A key protection for delivery staff is to support them with the right to refuse delivery to a person who is intoxicated, and FARE also supports the proposed offence (s143ZA) for taking, or threatening to take, punitive action against delivery persons for delivery refusal based on the requirements in the Act.

Recommendation 10. Ensure the protections in the Bill are effective by expanding the current program of compliance tests to include online sale and delivery of alcohol, and funding Access Canberra to specifically monitor and enforce changes in the Bill.

Recommendation 11. Amend the requirements for retailers to collect data and keep records to specify this includes volume of alcohol sold online as well as delivered geographically. ACT Government should publish regular sales and delivery data reports, including of refusal incidents, to enable research and compliance monitoring.

Recommendation 12. Amend s105, s110 and s225, to clarify that delivery companies are liable for delivery breaches, such as delivery to children or people who are intoxicated.

6. Licensing and risk factors

Establish a licence category for OS&D

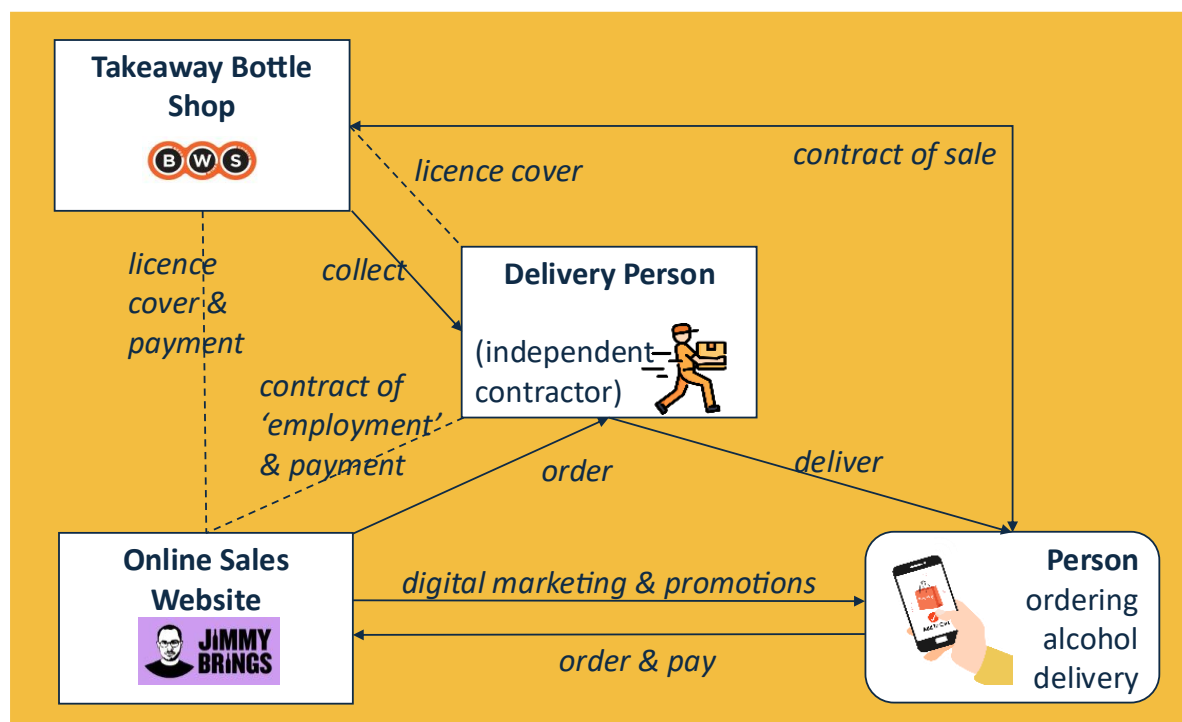
Currently, there is no licence category in the Liquor Act directly governing OS&D of alcohol. The most relevant licence category is “off licence”, but this is a licence authorising the licensee to sell alcohol “at a licensed premises” in sealed containers for consumption off the premises (ie. takeaway). The Bill provides for an ‘authorisation’ under an existing licence for OS&D.

This means that an ACT delivery provider will not need their own liquor licence, allowing delivery companies to continue to operate under a separate company’s licence. It also limits the ability of the ACT Government to monitor their compliance, as there are less avenues for penalising breaches (such as loss of a licence). There can be up to three different commercial entities involved in online sales and delivery of alcohol in the ACT. These include the online sales company, the licenced takeaway bottle shop that the alcohol is collected from, and the delivery driver, (often an independent contractor).

The purpose of different licence categories is to reflect different business types, and align administration processes, compliance and licensing fees with these different business types, and with the different risks of alcohol harm for each. The most effective regulatory instruments

are those that can directly monitor and enforce compliance with the most relevant entities involved. Any commercial entity selling or delivering alcohol should hold a liquor licence themselves. Without this process, the ACT Government has limited oversight of delivery companies and less compliance enforcement options.

Behind the scenes of OS&D



Stretching existing licence conditions over fundamentally different business models will require multiple exclusions and exemptions. An integral part of this new licence category application process would be for it to trigger community consultation, as people in a local area where alcohol delivery is being expanded into, should be consulted. Without a specific OS&D licence category, there is no process that triggers public consultation for OS&D.

The Victorian Commission for Gambling and Liquor Regulation has developed such a licencing model for OS&D of alcohol, by establishing the category of 'Remote Seller'.⁴⁷ This licence category applies to entities supplying alcohol to people not currently on the licenced premise, (including sales over the phone, via the internet or through an app), and delivered to customers to use off-premises. It has its own application processes and risk-based licence fees.

FARE further encourages the Committee to consider and recommend improvements to the current licence application process under the *Liquor Act*, which is insufficient in several regards, including by excluding public participation in favour of business interests:

- The current licence application consultation process does not require a community impact statement (CIS) or equivalent. A CIS is usually an applicant-developed summary of the potential harms that a liquor licence might have in a locality. It provides the basis for the community to respond.
- The risk-assessment management plan (RAMP) prescribed in the Act for licence applications, does not require engagement with community, reporting of community feedback or assessing likely impacts. Currently the liquor licence application process does not publish the full licence application, or the risk-assessment management plan (RAMP).
- An independent advisory information service, with staff that have expertise in licensing systems and an understanding of community needs and expectations, would support individuals and communities in navigating and interacting with the liquor licensing

system – FARE refers the Committee to the pilot service in NSW, the Alcohol Community Action project (ACAP),⁴⁸ as an example that could be considered for the ACT.

Recommendation 13. Amend s16 to s21, to establish a separate, specific liquor licence category for OS&D. Require retailers, such as bottle shops and third-party delivery companies, to have and display this license to sell alcohol online or to deliver alcohol.

Recommendation 14. Improve community impact processes in the Liquor Act, including publishing full licence applications with risk-assessment management plans and, resourcing independent support for members of the public impacted by increases in alcohol supply density.

Develop OS&D risk ratings including supply density

Alcohol harms are identified and responded to, based on a scientific calculation of the risk of harms. Likewise, risk-based licensing (RBL) aligns licensing fees and conditions with evidence of the risks of alcohol harm. RBL means that licensing fees are calculated using evidence-based risk factors, (trading hours, patron capacity, density and proximity, and compliance history).

Since 2010, the ACT has calculated and set liquor licensing fees according to the risk factors of venue type, occupancy and trading hours. RBL was found to contribute to a decline in the number of alcohol-related offences in the ACT by 25%.⁴⁹ The rapid growth of online sales and delivery of alcohol introduces new risks of alcohol harm, including increased availability, accessibility, density of alcohol supply, and rapid and unsupervised delivery. There is no provision in the Bill for calculating fees based on a risk factor of OS&D.

There is substantial evidence of liquor outlet density being a risk factor of alcohol harm:

- A *NSW Bureau of Crime Statistics and Research (BOCSAR)* study found a higher concentration of hotel licences strongly predicted intimate and non-intimate partner violence.⁵⁰
- The *World Health Organisation (WHO)* has highlighted that neighbourhoods which have higher densities of alcohol outlets also have greater child maltreatment problems.⁵¹

The ACT Liquor Act requires consideration of the harm minimisation and community safety aspects of the proximity of alcohol outlets. However, there are no requirements about calculated outlet density, and the Bill has no provision for developing a risk rating for density. (Although it establishes a requirement for collecting online sales data geographically which is needed to calculate supply density.)

Recommendation 15. Amend s229 to establish a risk-factor for online sales and delivery to accurately reflect the increased risk of harms. Amend s229 to incorporate a risk factor for supply density (as an equivalent for outlet density) for online sales and delivery of alcohol in a geographic area. Consult alcohol policy experts on the development, implementation and evaluation of such a risk factor.

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