



4 July 2017

Alcohol Policies and Legislation Review
C/- Department of Health
PO Box 40596
CASUARINA NT 0811

Email: Alcohol.review@nt.gov.au

The ALH Group is pleased to respond to the Northern Territory Alcohol Policies and Legislation Review 2017.

ALH operate 330 licensed venues and over 550 retail liquor outlets across Australia employing almost 16,000 people. These venues offer a diverse hospitality experience including, sports bars, bistros, restaurants, cafes, electronic gaming, retail liquor, accommodation, nightclubs and wagering. ALH venues are located in capital cities and urban and regional centres across Australia.

In the Northern Territory ALH operate 3 hotels and employ 135 staff.

Our hotels

- Serve over 57,00 meals each day
- Offer over 1,850 accommodation rooms
- Spend over \$28 Million per annum on bands acts and DJ's
- At a local (hotel) level ALH sponsor over 1,000 clubs nationally and our hotels provide a meeting place for many local community groups.

ALH Group investment in Northern Territory

In the last financial year ALH spent in excess of \$1.5 Million in Northern Territory on venue refurbishment and improvements.

Annual Financials

Payroll Tax	\$300,000
Gaming taxes and levies	\$1.66 Mil
Repairs and Maintenance	\$245,000
Capital Expenditure	\$1.34 Mil
Bands, Acts and DJ's	\$290,000

ALH will focus its capital investment in the Australian states it operates based on both return and regulatory certainty.

ALH is a member of the Australian Hotels Association (NT)

Responsible Service of Alcohol

ALH Group believes that individuals have the right to choose to consume alcohol in licensed venues as a form of social activity. We have a responsibility to deliver best practice in terms of our service of alcohol and to set a positive example to our customers and to other licensees.

Licensed venues have the advantage of specially trained staff in the responsible service of alcohol (RSA). As a result of all the regulatory requirements such as RSA, RSG, CCTV, etc. we believe hotels are the safest place for customers to have a drink, consume a meal or place a bet.

Hotels have worked over many years with state governments and their local liquor accords on the following key priorities:

- Ensuring there is no sale and supply to underage
- Not tolerating Intoxication and drunkenness
- Ensuring a safe environment within the hotel
- Ensuring amenity of the surrounding area

ALH has supports measures aimed at responsible consumption of alcohol, including

- Greater emphasis on measures promoting personal responsibility that lead to a more responsible drinking culture and a greater level of personal accountability for people who engage in unacceptable behaviour as a result of excessive alcohol consumption
- Law and order solutions that provide a greater police presence in entertainment precincts and increased penalties for repeat offenders.
- A comprehensive, accurate and consistent scheme for the collection and evaluation of data related to alcohol and illegal drugs, to assist with evidence based public policy.
- Mandatory education about alcohol to promote and encourage more responsible drinking practises

Safe practices enforced by our hotels include:

- Assessing intoxication levels of customers using a number of methods, including observing changes in behaviour, observing emotional and physical state, and monitoring noise levels and drink purchases
- Monitoring emotional and physical state of customers for signs of intoxication and ill effects of illicit or other drug usage
- Identifying customers to whom sale or service must be refused according to state and territory legislation, including minors, those purchasing on behalf of minors, intoxicated persons, and persons affected by the consumption of illicit and other drugs
- Promoting low and mid strength alcohol beverages
- ALH have led the market in implementing tempered glassware, the provision of free water, comprehensive CCTV coverage and participation in local liquor accords.

Additionally, ALH hotel staff must undertake formal state approved training that requires them to:

- Ensure proof of age prior to sale
- Ensure alcohol beverages are consumed in a responsible manner
- Identify erratic drinking patterns and consumers at risk
- Refuse service in situations of misuse
- Provide appropriate assistance to customers when refusing service

General Comments

Responsible Service of Alcohol

Licensed venues have the advantage of specially trained staff in the responsible service of alcohol (RSA) As a result of all the regulatory requirements such as RSA, RSG CCTV etc. we believe hotels are the safest place for customers to have a drink, consume a meal or place a bet, as detailed under the heading "Responsible Service of Alcohol".

Licensed trading conditions should continue to be based on a risk-management approach. The trading risk and management practices in place at each individual venue should be the determinants of trading conditions (including trading hours)

Regulatory Neutrality

There should be regulatory neutrality for all industry participants, such as the conditions applied to hotels for example security requirements, fire and safety conditions, noise restrictions and provision of amenities such as toilets. All participants should meet the same statutory and regulatory requirements.

Taxation

Taxation changes or a minimum (floor) price are inefficient and inequitable method of addressing alcohol-related harm which would impact on moderate and responsible drinkers and fail to either deter harmful drinkers or encourage responsible drinking behaviour.

Advertising

There is no credible evidence to suggest that a ban on bottle-shops from advertising discounted liquor prices would impact on patterns or levels of consumption in a positive manner.

Alcohol purchased in bottle-shops for off-premises consumption is predominately purchased for consumption over a period of time after the purchase is made. This is regardless of whether the alcohol is discounted or not.

Any such ban would significantly limit the ability of customers to access and compare bottle shop price information. In ALH's experience, access to such information is particularly valued by customers who are continually looking for ways to make the most of limited household budgets when making the food, liquor and other purchases across a week

Impact of further regulatory restrictions

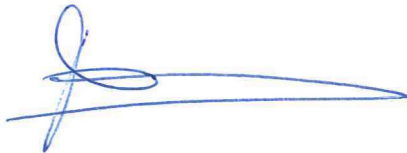
- May not have any effect on reducing alcohol-fuelled violence
- Reduce employment at our hotels which will cost some of our employees their jobs or a reduction in hours employed.
- Reduce potential employment opportunities at our hotels.
- Significantly reduce sector confidence
- See a reduction in venue refurbishment and capital expenditure.

Policies designed to reduce alcohol misuse must be targeted towards the people who misuse alcohol rather than at the majority of people who consume alcohol responsibly.

ALH invests considerably in the Northern Territory and want to ensure sustainable employment and investment into the future.

I would welcome the opportunity to further discuss our submission. Please do not hesitate to contact me on (03) 9829 1000 if you require further information.

Yours sincerely,

A handwritten signature in blue ink, consisting of a stylized 'D' followed by a long horizontal stroke.

David Curry
Head of Regulatory and Corporate Affairs