

## **Tobacco and Other Smoking Products Amendment Bill 2023**

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Committee Secretary  
Health and Environment Committee  
Parliament House  
George Street  
Brisbane QLD 4000

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## ARA SUBMISSION TO INQUIRY INTO THE TOBACCO AND OTHER SMOKING PRODUCTS BILL 2023

The Australian Retailers Association (ARA) welcomes the opportunity to comment on the Health and Environment Committee's inquiry into the Tobacco and Other Smoking Products Bill 2023 (the Bill).

The ARA is the oldest, largest and most diverse national retail body, representing a \$400 billion sector that employs 1.3 million Australians – making retail the largest private sector employer in the country. As Australia's peak retail body, representing more than 120,000 retail shop fronts and online stores, the ARA informs, advocates, educates, protects and unifies our independent, national and international retail community.

We represent the full spectrum of Australian retail, from our largest national and international retailers to our small and medium sized members, who make up 95% of our membership. Our members operate across the country and in all categories - from food to fashion, hairdressing to hardware, and everything in between.

Some of our members in the supermarket and convenience store segments are retailers of tobacco products and operate in compliance with existing regulations. The ARA's membership does not include manufacturers or suppliers of tobacco products and we do not receive any funding from the tobacco industry.

In principle, the ARA strongly supports the regulation of the sale of tobacco products, due to the well-known adverse health impacts these products have on individuals and the community.

We therefore support the Bill.

We note that the Bill will introduce a licensing system that we believe will assist in deterrence of the illicit tobacco trade as well as enforcement of regulations. Likewise, we support the introduction of a fit and proper person test as part of the licensing framework.

Given some of the practical implications of the licensing scheme, including around implementation, we encourage the Queensland Government to provide industry with a reasonable implementation timeframe in order to give effect and comply with the changes. Adequate notice to affected retailers to ensure any changes can be implemented in an effective manner, at least cost to business is needed.

In addition, we note the proposed licensing scheme links to liquor licensing and we would appreciate confirmation that each licensed premise, for example a hotel, attached bottle shop and/or detached bottle shop, would require a licence and whether the licence would need to be held by the same entity that holds the liquor licence for that premises.

Finally, we also make the observation that retail trade is dynamic and innovation is constantly driving change to how retail sales are conducted. The regulatory framework needs to balance the need to be prescriptive in terms of restrictions against allowing flexibility for when changes (or when licences are renewed) occur more generally to retail stores and how they do business.

Thank you again for the opportunity to provide a submission to the Committee. Any queries in relation to this submission can be directed to our policy team at [REDACTED]