



12 January 2021

Chair
Legal Affairs and Community Safety Committee
Parliament House
George Street
Brisbane QLD 4000

Dear Chair

LIQUOR (ARTISAN LIQUOR) AMENDMENT BILL 2020

The Queensland Coalition for Action on Alcohol (QCAA) welcomes the opportunity to provide a submission on the *Liquor (Artisan Liquor) Amendment Bill 2020*.

QCAA is a coalition of like-minded health and community organisations in Queensland committed to reducing alcohol-related harm. Alcohol harm in Queensland is significant with more than 1,100 lives lost every year and more than 33,900 people hospitalised, making alcohol one of Queensland's greatest preventive health challenges.¹ These harms not only affect the drinker, but also impact on people in the broader community.

In light of the known harm from alcohol, QCAA offers a general caution against actions to reduce regulation of any section of the liquor industry and conditions associated with the sale, purchase, promotion and consumption of alcohol. The primary purpose of the *Liquor Act 1992* (the Act) should be to minimise harm from alcohol. Any increase in the availability of alcohol has the potential to increase harms.

In addressing the contents of the Amendment Bill, QCAA makes the following comments on particular proposals outlined in the draft legislation. QCAA has made comments on proposals within the Amendment Bill that propose risk of increasing alcohol harms and on proposals relating to enforcement of the Act and subordinate legislation. The sequencing of QCAA's response to the proposals follows that used in the Explanatory Notes.

The QCAA acknowledges the good intentions behind the Bill for small business however our coalition believe key inclusions in the Bill should not be supported in the Parliament because overall the proposed legislative measures are likely to increase the risk of alcohol-related harm. Further, QCAA expresses caution that this proposed legislative framework allows for large alcohol companies to manipulate the system through ownership of multiple craft brewers, thus increasing their production of alcohol products. This is not the intent of the legislative change and should be explicitly prohibited.

Thank you again for the opportunity to respond to measures under consideration in the Amendment Bill. I would welcome the opportunity to discuss this submission with the Committee.

Yours sincerely

Emeritus Professor Jake Najman
Chair

Dr Dennis Young AM
Hon Secretary

Summary Responses

Proposals	Response
Create a new 'commercial other – artisan producer' licence (artisan producer licence)	QCAA is concerned that the increased scope of the new licence type is not equally matched by increased risk mitigation. In particular the potential harm associated with increased access and availability of alcohol due to extended trading hours – 9am instead of 10am opening, and 1am close instead of 12am.
Expand existing promotional event framework	QCAA opposes the proposal to expand on the existing licencing conditions in relation to promotional events. In particular the normalisation of drinking that is associated with alcohol availability at spaces such as farmers markets in early hours of the morning, as well as unstated regulation limits on sample and takeaway volumes.
Encourage transition of existing eligible licensees to artisan producers license	<p>QCAA cautions the proposal to waive artisan producer application fees (approx. \$146,046 of foregone revenue) and notes that this revenue could be allocated to preventative health measures.</p> <p>QCAA expressed caution at automatically carrying over extended trading hour approvals and permits given to existing licence holders and recommends that consideration is given to the Commissioner reviewing all applications.</p>
Increased power for the commissioner	QCAA cautiously supports increasing the administrative power of the Commissioner outside of the Liquor Act. While it is acknowledged in the Explanatory Notes that it is envisaged that the Commissioner would only use these administrative powers to set limits below what is provided in the Act or regulation, and that the power to further restrict sample sizes and trading hours is acknowledged as a positive outcome, QCAA is concerned that the legislation equally allows for the Commissioner to permit higher sample sizes and extended trading hours at promotional events such as farmers markets that commence as early as 6am.

ⁱ Gao, C., Ogeil, R., & Lloyd, B. (2014). Alcohol's burden of disease in Australia. Canberra: FARE and VicHealth in collaboration with Turning Point