

14 February 2023

Ms Lanie Chopping
Director General
Department of Local Government, Sport and Cultural Industries
Gordon Stephenson House, 2nd Floor Reception
140 William Street
Perth, WA 6000

Via email: liquorreform@dlgsc.wa.gov.au

Dear Ms Chopping

LIQUOR LICENSING REFORM

The Chamber of Commerce and Industry of Western Australia (CCIWA) is the peak body advancing trade and commerce in Western Australia. We are fundamentally committed to using our insights to develop and advocate for public policies that will help realise our vision to make WA the best place to live and do business.

Thank you for the opportunity to provide comment on the next chapter of liquor licencing reform. We support the government's ongoing commitment to identify opportunities to improve the liquor licensing framework, by reducing red-tape and areas of over-compliance.

As part of our engagement with members, we have encouraged licensees, prospective licensees and liquor business owners to complete your department's survey. We have also received feedback directly and we will use this letter to convey the key concerns and recommendations for improvement, which are in line with Themes 1, 2, 4 and 5.

Theme 1: Reduce Red Tape and Maximise Opportunities for Industry

We commend the government for seeking to reduce red-tape associated with holding a liquor licence. As noted in CCIWA's Pre-Budget Submission, we strongly support government continually focusing on improving the way it regulates and by removing redundant and archaic rules. This ensures that regulation helps, not hinders, business investment in WA.

Some of the key concerns raised regarding the liquor licensing application and approvals process include that:

- the licensing framework is confusing and unclear for users, particularly with multiple licence and permit types, and the differing restrictions and conditions attached.
- there also exists considerable uncertainty with respect to the timeframes for approvals.



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To address these concerns, we support:

- the introduction of statutory timeframes for liquor licensing approvals to give clarity to business.
- making the framework more modern and streamlined, identifying opportunities where regulation can be used instead of licensing, reducing the number of licence and permit options, and where the 53 liquor licensing policies can be effectively consolidated.
- expanding exemptions to requiring a licence where there is clear economic benefit and where the community's health and safety expectations are being appropriately managed.

These recommendations are a positive step toward a risk-based approach to regulation and reducing restrictive red-tape. This would enable businesses/operators with effective and proven controls in place to manage their risks and responsibilities.

Theme 2: Modernising the regulatory framework

We support modernising and simplifying the legislative framework, thereby making it easier for laws to respond more effectively to industry and the community.

Some of the key concerns raised by our members point to the inherent complexity that exists, including:

- the duplication that exists between multiple affiliated approval schemes, including building codes, local government planning as well as environmental, health and local Laws. This confuses businesses, as well as results in extended timeframes and unnecessary costs.
- unintended consequences of specific legislative requirements, for example:
 - limits placed on alcohol quantities purchased instore versus online purchasing
 - the use of different licensing restrictions for different regional centres in close proximity (eg: differences between Port Hedland, Kununurra and Karratha).

To address these concerns, we support:

- ensuring the licensing framework considers the experience of the end-user by:
 - reducing the number of licence and permit types to simplify the application and approvals process;
 - identifying areas where duplication exists between agencies, and introducing mechanisms that encourage and support multi-agency collaboration and coordination to support the end-user's experience.

Theme 4: Simpler Systems

An online licensing system that is user-friendly and customer-focused would ensure businesses are not held back from growing their organisations due to the imposition of unnecessary administrative costs.

An integrated one-stop-online-shop which includes all relevant information (guides and templates), facilitates simple online lodgement of applications, as well as providing the

approval status would simplify processes, remove complexity, and provide transparency across the application and approvals process. At the one-stop-online-shop, applicants should be able to access:

- licensing checklists
- be supported in identifying the appropriate licensing type
- a central point of contact for licensing enquiries
- a clear indication of the timeframe for approvals; and
- the intended costs involved.

Theme 5: Stronger Industry Education and Information

Any change in the approach to regulation should be supported by a state-wide education campaign using various communication and social media channels that ensure the business community are made fully aware of the changes. We also support improvements that simplify the department's language and provides users with clarity over licensing types.

Once again, thank you for your department's commitment to address the key concerns around regulatory complexity and the need to reduce red-tape. We look forward to seeing changes being implemented in a timely manner.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'CR', with a horizontal line extending from the end of the signature.

Chris Rodwell
Chief Executive Officer