



28 October 2020

By E-mail: [thepremier@premiers.qld.gov.au](mailto:thepremier@premiers.qld.gov.au)

Dear the Hon Anastacia Palaszczuk,

**RE: SUBMISSION INTO TAKEAWAY LIQUOR LICENSING REFORM**

We write to the Queensland Government (the “**Government**”) with respect to the temporary changes to allow Queensland licensed restaurants and cafes to supply takeaway liquor (including via delivery) in conjunction with approved takeaway food services, subject to conditions restricting the quantity and type of liquor. In the first instance, Restaurant & Catering Industry Association (“**R&CA**”) wrote to the Hon Yvette D’Ath, the Queensland Attorney-General and Minister Justice, and consulted with the Office of Liquor Gaming Regulation, which extended the invitation to file a written submission with your Government. As such, R&CA is pleased to provide a submission into this matter.

R&CA is the national industry association representing the interests of more than 47,000 restaurants, cafés and catering businesses across Australia. The café, restaurant and catering sector is vitally important to the national economy, generating over \$37 billion in retail turnover each year as well as employing 450,000 people. Over 92 per cent of businesses in the café, restaurant and catering sector are small businesses, employing 19 people or less.

R&CA delivers tangible outcomes to small businesses within the hospitality industry by influencing the policy decisions and regulations that impact the sector's operating environment. R&CA is committed to ensuring the industry is recognised as one of excellence, professionalism, profitability and sustainability. This includes advocating the broader social and economic contribution of the sector to industry and government stakeholders, as well as highlighting the value of the restaurant experience to the public.

### **Key Advantages for Liquor Licensing Reform**

In response to the COVID-19 pandemic, R&CA understands that the Government issued a regulation in March 2020 allowing licensed venues to sell and deliver up to 2.25 litres of alcohol as part of the temporary takeaway liquor model to assist the hospitality industry navigate the COVID-19 pandemic. R&CA acknowledges that this measure has been extended to 31 December 2020, in line with the gradual relaxation of the current limitations within the Government's 'roadmap to easing Government restrictions.' Further, R&CA is pleased to act as a key stakeholder in discussions presently with the Department of Employment, Small Business and Training with regards to the current COVID-19 regulatory reforms pertaining to amendments to the *Liquor Act 1992* to support the sale of takeaway alcohol by cafes, restaurants and clubs as a permanent model.

In light of the COVID-19 pandemic and as a further means to support the [industry with the JobKeeper subsidy due to cease in March 2021, R&CA is strongly of the view that there is a sound policy rationale for liquor licensing reform by way of a more permanent model. Some of the key advantages to a permanent model are identified below:

1. A drastic increase in the reliance on takeaway and delivery as a trend that will continue long-term for the restaurant, café and catering sector;
2. Takeaway liquor now becoming an important additional source of revenue for operators;

3. The current licensing structure does not adequately allow for restaurants and cafes to continue with the sale of takeaway liquor and current license classes do not properly reflect changing market demands;
4. Delivery models are an important and an innovative way in which industry operators can remain sustainable and pivot their businesses in the current COVID-19 climate. So much is true as reflected by 7% of working-age Australians performing “platform work” within the last 12 months and the near doubling of online food delivery services from 15.4% in 2017 to 31.2% in 2018;
5. The provision of alcohol in this manner poses a low risk from a responsible service of alcohol perspective; and
6. Consumers have indicated considerable support for the temporary regulations and have indicated an intention for them to be extended post-COVID-19.

Since the introduction of these arrangements, R&CA has recently met with several regulatory bodies in various state and territories with respect to continuing and making the current takeaway liquor arrangements more permanent. This included meeting with Vickie Chapman MP, the Deputy Premier and Attorney-General of South Australia, and resulting from those discussions, the South Australian Government introducing the Liquor Licensing (COVID-19 and Other Measures) Amendment Bill 2020 and the Liquor Licensing (General) (COVID-19 Measures) Variation Regulations 2020 as part of its liquor licensing reform. It is understood that this model is extended to restaurants, caterers, clubs and other small venues. These proposals are supported by R&CA and, of course, a wide range of industry operators.

In Victoria (who introduced similar temporary rules during COVID), there exists a established license category, called a Renewable Limited License, which allows for ‘restaurants, cafes, and food vendors that wish to supply liquor in conjunction with the supply of a home-delivered meal or with a meal for takeaway from the premises’. This is a further license application that is available only to on-premise licensees and limits the quantity and means of delivery supply to customers for consumption off the premises.

We thank the Government for considering our submission. If you wish to discuss R&CA's views further, do not hesitate to contact Victor Song (Senior Adviser – Industrial Relations and Policy) by email on [victors@restaurantcater.asn.au](mailto:victors@restaurantcater.asn.au)

We thank you again for the opportunity to make this submission.

Regards,

A handwritten signature in black ink, appearing to be 'Wes Lambert', written in a cursive style.

**Wes Lambert CPA FGIA MAICD**  
Chief Executive Officer  
Restaurant and Catering Australia