OBJECTION TO APPLICATION

TO: DIRECTOR GENERAL OF LICENSING

By Email: Director-GeneralofLicensing.AGD@nt.gov.au

RE: WOOLWORTHS GROUP LTD APPLICATION TO SUBSTITUTE PREMISES AND VARIATION OF LICENCE CONDITIONS FOR LIQUOR LICENCE BEING "LIQUOR MERCHANT – AUTHORITY 81000242"

Being an application to substitute premises currently known as BWS – Beer Wine Spirits (Stuart Park), Shop 1, 27 Stuart Highway to the corner of Bagot Road and Osgood Drive, Eaton to be known as "Darwin Dan Murphy's" (the Application).

This objection is being made by the Association of Alcohol and other Drug Agencies NT (AADANT) is the peak body for the non-Government alcohol and other drug sector (AOD) in the Northern Territory and represents the services who deliver treatment to those impacted by drug and alcohol misuse. AADANT works with non-government AOD services across the Northern Territory and supports the delivery of treatment services to individuals, families and communities who are impacted on by alcohol and drugs. AADANT is also committed to sector development and advocacy for all its members and the broader welfare sector.

AADANT supports the AOD sector and those who provide treatment across a wide range of service delivery models including counselling, residential rehabilitation, withdrawal services, youth, outreach, family support and many more.

Alcohol is the primary reason that individuals and families access AOD services in the Northern Territory and it is well documented the significant issues that occur with the over consumption of alcohol. There are many families, communities and individuals who are struggling with alcohol dependence issues, and alcohol is overrepresented in incidents of domestic and family violence and assaults on others in the community.

BACKGROUND

In October 2017, Chief Minister Michael Gunner announced a series of changes to NT Liquor Laws in response to the recommendations of the Riley review into alcohol policies in the NT.

This licence is not a 'like-for-like' substitution. Endeavour Drinks Group owns both BWS and Dan Murphy's brands and by their own definitions clearly show the difference in their business models – BWS is 'A small "convenience" drinks merchant' whereas Dan Murphy's is 'A destination "big-box" drink merchant' - http://www.edgpartners.com.au/our-brands (accessed 29 August 2018).

Although the application appears to show a reduction in trading hours from the current BWS store it will increase access and availability for liquor in the proposed neighbourhood.

Regardless of minimum floor price, Dan Murphy's guarantee to be the cheapest in the market for liquor. Evidence shows that price and availability are crucial elements in consumption and related harm.

GROUNDS OF OBJECTION

- a) Dan Murphy's are a high volume low cost business.
- b) Dan Murphy's markets itself with the slogan "Lowest Liquor Price Guarantee".
- c) This new proposed bottle shop is positioned on the main road at the centre of Darwin, being almost equally distant from Leanyer and Stokes Point. This means most people in Darwin will have easy access to this new proposed bottle shop, because it is accessible by foot, car and numerous public transport options.
- d) This new proposed bottle shop has a trading floor area that is significantly larger than the store in Stuart Park, and larger than a typical bottle-shop in Darwin.
- e) Bagot, Minmarama and Kulaluk Communities are all within a short walking distance of this new proposed bottle shop. Our members have observed these communities are already affected by harm caused by alcohol.
- f) This licence move will increase density of liquor outlets in the neighbourhood.

AADANT believes there are already a high number of alcohol points of sale and that the expansion of a larger outlet with bulk sales will increase alcohol related harm in the community.

AADANT supports the view of NTCOSS and recommends the Commission engage an independent consultant to prepare a Social Impact Assessment/Community Needs Assessment. This would ensure that the harm that flows from this type of application can be properly assessed.