



Gisborne Police
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Wednesday the 31st March 2010.

The Chairperson
The Gisborne District Licensing Agency
The Gisborne District Council
P.O. Box 747
GISBORNE

Dear Sir/Madam

With reference to the Sale of Liquor Policy.

This submission has been prepared by Sergeant NGATAI (Alcohol Harm Reduction Officer) of the Gisborne Police.

The Gisborne Police fully support the current Sale of Liquor Policy submitted to be heard at the Hearings Committee on the 4th of May 2010.

The objective of the act is to **“establish a reasonable system of control over the sale and supply of liquor to the public with the aim of contributing to the reduction of liquor abuse, as far as that can achieved by legislative means”**.

There are a number of ways to achieving this objective by working with other agencies to educate the public and licensees through education, surveillance, compliance and enforcement.

Police totally support the restrictions on the hours set for both On and Off License for both Residential and Non Residential Areas.

Police fully support the One-Way door policy if it is adopted by the On License premises and can operate to 3.00am. Restaurants to operate to a maximum time of 1.00am where their primary purpose is dining.

Limiting the hours of operations that sports Clubs are open will be determined by the nature of the clubs activities and the hours set are recommended hours of operations.

The vetting of Manager Certificate Applications will improve the quality of Managers currently in the trade and provide a consistent measuring tool after passing the initial consideration stage. Applicants can be interviewed after the initial consideration stage to test their knowledge of their responsibilities under the Act.

There are a number of tools available to the District Licensing Authority and the support agencies to help control the abuse of alcohol in the community.

By implementing this Sale of Liquor Policy, we as a combined team can educate the people in the Liquor Industry by working with them to achieve the best results for all involved. Education in the Liquor Industry with consistent compliance checks has proven to be very successful to lower the liquor abuse. Hosts responsibility, by way of food availability, Non alcoholic drinks, signage and Taxi service will assist in lowering the abuse.

The community also has their part to play in respect of alcohol abuse. We need to change attitudes. Limiting the drinking time, the availability of food, raising the drinking age, less promotion, increase prices and increasing penalties are other initiatives being promoted.

Police Commissioner Howard BROAD has stated in The New Zealand Police Strategic Plan 2010 that one of our challenges will be to concentrate on:

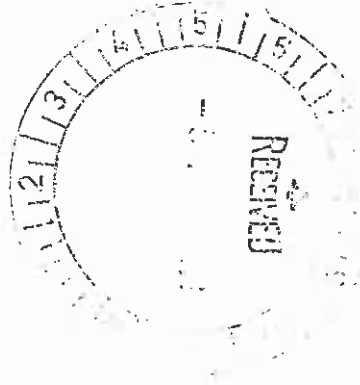
Drugs and alcohol - International research suggests 50 -70% of total crime is fuelled by the consumption of alcohol. In New Zealand it is not what we drink, it is the way we drink. Changes in behaviour are necessary. Drugs and alcohol are ruining the lives of many, including families and communities.

For your information.

Yours faithfully

Isaac NGATAI
Sergeant INF199
Alcohol Harm Reduction Officer
New Zealand Police
GISBORNE

145189



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1 April 2010

The Secretary
Gisborne District Licensing Agency
PO Box 747
GISBORNE

Dear Sir

REVIEW OF GDLA SALE OF LIQUOR POLICY

This submission is made on behalf of Healthy Environments, Te Puna Waiora, Tairāwhiti District Health.

The Population Health team of Tairāwhiti District Health exists to improve, promote, and protect the health of the people pursuant to the New Zealand through a number of instruments, notably the Public Health and Disabilities Act 2000, the Health Act 1956 and in relation to this submission, the Sale of Liquor Act 1989. In terms of the wider effects these statutory obligations are exercised by the Medical Officer of Health and through him the Healthy Environments team.

The relationship between health and alcohol is complex. There are arguments and counter-arguments as to the personal health benefits. However what is clear from research and evidence is that alcohol is responsible for a considerable burden of ill-health, and public health intervention is warranted¹.

The 5+ Solution is a set of policy directives based on the internationally acclaimed, World Health Organisation sponsored, publication, "Alcohol: No Ordinary Commodity" written by fifteen of the top alcohol and public health scientists in the world (Babor et al 2003). It has recently been further endorsed by a paper in the leading medical journal *The Lancet* (Anderson et al 2009)². One of the 5+ solutions that is easily achieved at a local level is the reduction in the accessibility of alcohol.

¹ Connor J, Broad J, Rehm J, Vander Hoorn S, Jackson R. The burden of death, disease and disability due to alcohol in New Zealand. *New Zealand Medical Journal* 15 April 2005;118(1213):

² <http://www.nzma.org.nz/journal/118-1213/1412/>

We have worked with our regulatory partners (the GDLA and the Police) to give practical effect to this solution and as such we endorse the changes proposed to the Sale of Liquor Policy. In particular we support the following major changes:

Proposed change	Rationale
A reduction in the maximum trading hours from 3am to 2am for those premises that hold late licenses	This change reflects the desire to reduce accessibility of alcohol, particularly in the early hours of the morning.
The adoption of a one-way-door policy for on-licensed premises wanting to continue trading beyond 2 am	We support the one-way door policy but would like to see this tightened even further to a 1.30 am policy. This supports the reduction in accessibility, but allows licensed premises to continue trading and consumption to occur in a controlled manner.
Limit the maximum trading hour of premises that hold a restaurant-style on-licence to 1am	Although dining patterns have changed considerably since the introduction of the Sale of Liquor Act, there is little evidence to support the concept that restaurant style consumption is occurring after 1am.
Simplification of the categories of club to "sports" and "other", and reduce the trading hours liquor can be sold in clubs to more accurately reflect club activities	This allows regulatory agencies to consider each application on its own merits. It also prevents situations where Clubs are run as de facto taverns
<p>Formalise and/or clarify existing process such as:</p> <ul style="list-style-type: none"> • requiring all stand-alone off licenses ie. bottle stores to adopt a designation • reinforce minimum food standards for premises that are required to provide food whilst selling or supplying liquor • assess the knowledge of all new manager certificate applicants 	This change supports the reduction in accessibility of alcohol. It further strengthens strategies to ensure consumption of alcohol occurs in a controlled, safe environment to minimise any harms arising from intoxication.
All premises to have a Host	Host Responsibility is a cornerstone in



Responsibility policy.	the reduction of harms arising out of the consumption of alcohol. We further seek to extend this section of the policy to require applicants to acknowledge in their policy the National Protocol on Alcoholic Promotions developed by ALAC, which provides guidance on acceptable and unacceptable promotions.
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New Zealand is currently at a cross roads in relation to legislation around the sale and supply of alcohol through the review by the Law Commission. While the GDLA SOL policy relates only to the sale of alcohol, there is a cross connection to the availability of alcohol for supply. Alcohol is a highly intoxicating drug that if it were introduced into today's market would be classified as a Class B Drug similar to heroin³. Key statistics that support continuing public health intervention are illustrated below⁴

- At least 25% of New Zealand drinkers are heavy drinkers (Wells et al 2006)
- A third of all police apprehensions involve alcohol (Stevenson 2009)
- Half of serious violent crimes are related to alcohol (Stevenson 2009)
- 60 different medical conditions are caused by heavy drinking (O'Hagan et al 1993)
- Up to 75% of adult presentations at Emergency Departments on Thursday, Friday and Saturday nights are alcohol-related (Quigley personal correspondence)
- Over 300 alcohol-related offences every day (Stevenson 2009)
- Over 500 serious and fatal injury traffic crashes every year (Erasmus 2009)
- At least 600 children born each year with fetal alcohol spectrum disorder (May & Gossage 2001)
- Over 1000 alcohol deaths in New Zealand every year (Connor et al 2005)
- 17,000 years of life per year are lost through alcohol (Connor et al 2005)

There is an emerging body of international evidence that the harms caused by heavy drinking can be alleviated through density controls. In New Zealand it has been found that living within 10 minutes' drive of relatively more outlets was associated with larger

³ Sellman, D Professor. Presentation to "Alcohol Causes Violence" conference, Te Papa, Wellington. March 2010

⁴ Alcohol Action NZ <http://alcoholaction.co.nz/FivePlusSolution.aspx>

quantities consumed by of young drinkers⁵. This study also found that the deprivation index correlated to density of outlets (with negative impacts). This finding is important if we are to achieve the positive outcomes identified by Council's Long Term Community Plan particularly the following outcome:

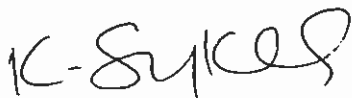
"4. *The impacts of alcohol-related harm, drugs and crime are reduced or eliminated.*"⁶

This review provides a platform for the District Licensing Agency to take a lead on the reduction of harm associated with alcohol. One way this could be given effect was if the policy were to restrict where alcohol outlets could be sited, the numbers of alcohol outlets permitted in suburban shopping areas, and place restrictions on distances of alcohol outlets to sensitive land uses such as places of religious worship, educational facilities or playgrounds.

Alcohol is a drug, and New Zealand has an acknowledged heavy drinking culture. Public health interventions are necessary to provide for better health outcomes. A Medical Officer of Health has a responsibility to support community level actions that will reduce the negative impact of alcohol on our community. Too often the consequences of alcohol for our community – high levels of interpersonal violence; death and injury from avoidable motor vehicle events; poverty – are ignored by pleading personal choice. However, a societal framework such as ours must consider the balance of when this personal choice should be exercised at the cost to other community members – those who experience the negative consequences of our alcohol use?

It is critical that the Council and GDLA exercise social leadership by framing alcohol use for our community. Such leadership will offer greater protection to those directly and indirectly affected by the negative effects of alcohol use in our community, especially women, children and other innocent victims of inappropriate alcohol use.

We would like to be heard in support of our submission.



Kate Sykes
Team Leader – Healthy Environments

For Medical Officer of Health

⁵ Huckle, T, Huakau J, Sweetsur P, Huisman O, Casswell S (2008). Density of alcohol outlets and teenage drinking: living in an alcogenic environment is associated with higher consumption in a metropolitan setting. *Addiction*, 103, 1614–1621

⁶ <http://gdc.govt.nz/assets/Files/Policy/Tairawhiti-by-Choice.pdf>

ALCOHOL ADVISORY COUNCIL OF NEW ZEALAND
Kaunihera Whakatupato Waipiro o Aotearoa



1 April 2010

REL0631

Have Your Say
 Sale of Liquor Policy
 Gisborne District Council
 PO Box 747
 Gisborne

To Whom It May Concern

Re: Gisborne District Licensing Agency – Sale of Liquor Policy

Thank you for providing the opportunity for the Alcohol Advisory Council of New Zealand (ALAC) to comment on the Gisborne District Licensing Agency – Sale of Liquor Policy.

ALAC is an autonomous Crown Entity charged under its empowering statute to give advice on alcohol-related matters and work to reduce alcohol-related harm in New Zealand.

Firstly, we would like to acknowledge your recognition of the role that your Council can play in ensuring that people can enjoy alcohol in moderation and be free of the harm that can occur when alcohol is used in a harmful or hazardous manner.

By addressing some of the issues in regard to the supply, provision and promotion of alcohol in the Gisborne District, it is likely that there will be a positive impact on some of the wider health and social issues in the community. Over the last few years there have been three reports released by economists estimating the cost of harmful alcohol use in New Zealand. Although the total cost of harm varied between the reports they all showed that the costs were enormous (BERL - \$4,437.1 million, Easton – 4% of GDP and Devlin - \$2 billion). The costs include health, police and justice services, and lost productivity.

General Comments

Overall, ALAC would like to congratulate Gisborne District Council on developing a comprehensive sale of liquor policy. We support local authorities to develop policies that reflect the views of the community and which are formally adopted by Council. The Liquor Licensing Authority (LLA) also supports the use of alcohol policies and has made reference to them in a number of cases (LLA PH 194/2007 [20]). More recently the Court of Appeal commented on the development of Liquor Licensing Policies and said that *"... Policies are seen by the Authority as a helpful source of information as to what a local community*

wants on liquor licensing matters. Essentially it is the perceptions and desires of the local community as expressed through their elected representatives, presumably after some level of consultation with the community" (CA340/2009).

Specifically, liquor licensing policies are seen to have a number of benefits including:

- Articulating the community's expectations about the environment in which liquor is sold and consumed
- Aligning liquor licensing practice with the community outcomes sought by the territorial authority
- Setting expectations for the public and licensees.¹

ALAC is pleased to note that Gisborne District DLA has identified the object of the Sale of Liquor Act. This was a key point made in *Liquor Licensing by Territorial Authorities* by the Controller and Auditor General's office and emphasised in 2008 by Judge Unwin at the Partnerships conference in Rotorua. Specifically, liquor policies assist with "establishing a reasonable system of control" over the sale and supply of liquor "with the aim of reducing alcohol abuse".

We note that you intend to review this policy as required or when any changes are made to the Sale of Liquor Act. We suggest that liquor policies are reviewed around every three to five years so that any changes in the drinking culture or emerging alcohol-related issues can be addressed. We also agree with your plan to review the policy if changes are made to the current Sale of Liquor Act.

ALAC believes that much more can be achieved in terms of reducing alcohol-related harm in a community where the development of a liquor policy is considered in the context of other council policies and strategies. It may be useful to consider how the Sale of Liquor Policy connects to other Council policies such as the Long Term Council Community Plan (LTCCP) and whether it would be useful for the policy to connect to a wider community alcohol strategy. The development of an alcohol strategy gives an opportunity for the different strands working towards reducing alcohol-related harm to link together and for the alcohol strategy to provide some of the evidence that informs the liquor policy.

Hours of Operation

ALAC supports a nationwide set of trading hours for on-licences and off-licences. In regards to on-licences we support the 2.00am closing time suggested, with the ability to allow for local variation in special circumstances where it may be appropriate. In these cases we would expect the local authority to have a well consulted alcohol policy which contains appropriate conditions to mitigate any risks associated with extended trading hours. The LLA has also shown support for a consistent set of trading hours. In decision No PH 1064-1071/2007 the LLA said "*It seems to us that the reduction of liquor abuse may well be achieved if there is a common closing time for all licensed premises in Queenstown rather than allowing premises to make their own decisions about when to cease trading.*"

¹ Controller and Auditor General (2007). *Liquor licensing by territorial authorities*. Office of the Auditor-General: Wellington.

The police have recently released a Policing Fact Sheet on licensed premises trading hours² which provides support for the reduction of trading hours. Prior to October 2007, of 12 bars within the Timaru CBD, four traded until 5.00am, while one had a 24 hour licence. During October 2007, closing times for all five bars were reduced back to 3.00am. Police data from this period showed:

- Fewer recorded crimes in Timaru after a reduction in licensed premises trading hours
- That the most profound reduction appeared to occur at weekends from 3.00am to 6.00am; with recorded violent incidents dropping by around two-thirds in the vicinity of Timaru's five inner-city bars
- That violent crime was not simply displaced to an earlier time, or elsewhere in Timaru; rather, the total number of violent incidents recorded by police reduced by 8% in the 12 months following the change in trading hours
- A one-third drop in the number of intoxicated persons taken to a place of safety by police after the reduction in trading hours.

To avoid transferring drinking from on-licence environments to public places or home environments we support off-licences having more restricted hours than on-licences. ALAC supports a blanket 10pm closing for all off-licences rather than the suggested 11pm closing in your draft policy.

One-Way Door Policies

Recent case law (primarily the Liquor Licensing Authority [LLA]) points to increased assurance that local liquor licensing policies can confidently establish a range of conditions on licences. In decision No. PH 1271-1272/2008 (application by Tardis Ltd), the LLA lists a range of matters that could be considered when determining an application seeking trading hours in excess of the licensing policy. These include:

- The implementation of an alcohol management plan
- Participation in a local accord
- Provision of bistro meals and/or free finger food
- An 0800 community hotline
- Restrictions on vertical drinking zones
- Banning RTD's or shots at certain times
- Independent audits
- Staff workshops
- Security
- Lockdowns or one-way door policies
- CCTV
- Funding taxi ranks and transport
- Funding local clean-ups
- Cool-down periods

² New Zealand Police (2009). Policing Fact Sheet: Licensed premises trading hours. New Zealand Police: Wellington.

We support actions such as these being taken by late-trading licensees and forming part of the licence conditions, where appropriate, and in collaboration with local licensing authorities and enforcement agencies.

The Court of Appeal in decision No CA340/2009 agreed with the LLA around applying conditions to assist with meeting the statutory objective. Specifically, they said *"In our view, the Authority is not required to be sure that particular conditions will reduce liquor abuse. It is entitled to apply the equivalent of the precautionary principle in environmental law. If there is a possibility of meeting the statutory objective (as the Authority found there was in this case), then it is entitled to test whether that possibility is a reality."*

In regards to one-way door policies specifically, ALAC conducted an evaluation of the Christchurch one-way-door intervention in 2008³. The evaluation found that while there was no overall reduction in alcohol-related crime in the inner city, there were reductions in some subsets of crime. It also showed that the one-way door intervention relied on effective working relationships by all parties, including Police and licensees. It may be useful to include in your planning some ongoing monitoring and evaluation of the Gisborne one-way door intervention.

Host Responsibility

Host Responsibility Policies are an important tool to document a licensee's commitment to Host Responsibility practices. While a Host Responsibility policy outlines a licensed premise's commitment to the principles of Host Responsibility, an Implementation Plan carries that commitment into practice, outlining how the policy will be enacted. ALAC would suggest that the Implementation Plan should be submitted at the same time as the Host Responsibility Policy. It would also be useful for Gisborne District to outline how they are going to monitor premises' Host Responsibility Policies.

Community Events

Often within a local community celebrations or events for the public are put on. These can range from large-scale public events to smaller community events. Some may be alcohol-free or have alcohol available in the context of safe responsible usage, which can help to reinforce positive messages – that celebrations can take place without alcohol, or that alcohol can be enjoyed in moderation in a safe, responsible manner.

ALAC would encourage the Gisborne District to add a section to their Liquor Policy on Community Events. Initiatives or actions that could be addressed in this section include:

- Host Responsibility guidelines for public events
- Guidelines for planning safe events

³ ALAC, prepared by Louise Kirkwood and Paul Parsonage (2008). *Evaluation of the Christchurch city one-way door intervention*, ALAC: Wellington

- Information about involvement of other agencies in the planning and execution of events, including, but not limited to, Police, public health services, medical emergency services, Māori wardens, youth workers and community groups.

For more information see ALAC's "*Guidelines for Management of Alcohol at Large-Scale Public Events*" available from www.alac.org.nz.

Inter-agency cooperation

The Auditor General's report suggests that District Licensing Agencies (DLA) need to identify how they are going to work with the Police and public health services. This could be through a protocol to record common goals, differing roles and an agreed approach to processing applications, sharing information and pooling resources. ALAC is pleased to note that Gisborne District is working closely with the Police and the Medical Officer of Health to utilise legislative as well as non-legislative measures to control the sale and supply of liquor.

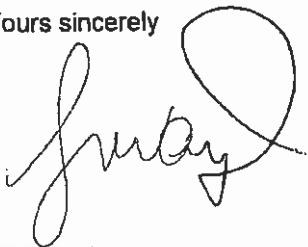
Summary

Overall, ALAC is very supportive of the Gisborne District Licensing Agency – Sale of Liquor Policy and we look forward to working with you in the future. **We are happy to appear at oral submissions** and would welcome the opportunity to meet local staff involved in the reduction of alcohol-related harm at the same time.

If you would like further information around anything mentioned in this submission feel free to contact Cathy Bruce, Project Manager Local Government Relations, e-mail: c.bruce@alac.org.nz, phone: (04) 917 0241.

Thank you for the opportunity to comment and make recommendations on the proposed policy.

Yours sincerely



Gerard Vaughan
Chief Executive Officer

Angela Joe

n 139541

From: Sarwan Kumar
Sent: Thursday, 4 March 2010 13:27
To: Angela Joe
Subject: FW: Sale of Liquor Policy submission

From: website@gdc.govt.nz [mailto:website@gdc.govt.nz]
Sent: Thursday, 4 March 2010 11:57 a.m.
To: Services
Subject: Sale of Liquor Policy submission

Sale of Liquor Policy submission

full name

Darryl Monteith

organisation (if applicable)

Creative Tairawhiti

postal address

P.O. Box 833 Gisborne

daytime phone

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email

darrylm@radionetwork.co.nz

Do you wish to speak to the hearings committee on 4 May about your submission?

no

This is what I think about the changes to the policy

Creative Tairawhiti would ask that consideration be given to the fact that the night-time economy is of crucial importance to the Performing Arts sector, and the Arts sector in general. Many of these licensed venues provide some small economic stability for the musicians/poets/actors who perform in them, and painters/sculptors/artisans who exhibit in them, while giving the broader community the opportunity to access these Artists' creative output - and hopefully develop an ongoing customer relationship with them. This includes our visitors from outside the district and from other countries. Creative Tairawhiti supports anything that can be done to encourage more people to go out more regularly to these places. This includes anything that will make the experience safer, easier and more fun. We would be most concerned if any of these new measures would stifle any of this activity, or limit the opportunities. Creative Tairawhiti is also most interested in helping GDC and other parties develop a "Night-time Economy Strategy" for the region that would further realise the Arts Sector's potential as an economic and social contributor.

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5/03/2010

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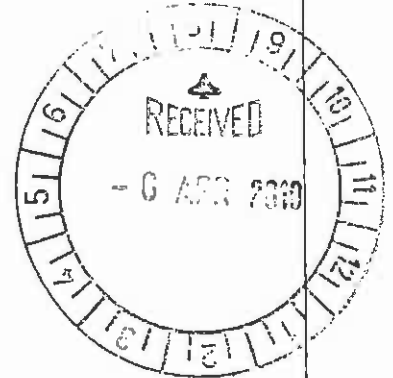


Hospitality Association of New Zealand



Hospitality Association of New Zealand

GISBORNE BRANCH



SUBMISSION TO GISBORNE DISTRICT COUNCIL

ON THE

DRAFT GISBORNE DISTRICT COUNCIL LIQUOR LICENSING POLICY

March 2010

The Hospitality Association is a statutory body created by the Hotel Association of New Zealand Act 1969. The Association has been restructured from the old Hotel Association to reflect the breadth of diverse operations in the hospitality sector including restaurants, café bars, taverns, country hotels, motor inns, off-licensed premises and short and long term accommodation providers. We believe the name "Hospitality Association" reflects this diversity.

The Hospitality Association of New Zealand (HANZ) has over 2400 members nationally, 30 of which are from the Gisborne Branch of the Association.

The Association is voluntary and funded by membership subscriptions and represents the interests of its members. There is also a widely held perception that the Association speaks for and represents the interests of the hospitality industry as a whole.

The contents of this policy are of considerable importance to our existing and future members. At present the Gisborne Branch of the Association represents approximately 30 members in the Gisborne District.

The Gisborne Branch wishes to comment on the following:

Overview of the proposed changes

It is essential that a balanced approach is taken; recognizing that alcohol consumption in well-managed environments has economic and social benefits. The Gisborne Region benefits from tourism and can boast a fabulous wine and café culture.

Point by Point comment:

Section 6 – Licensing Hours Policy

- **Limits on Hours of Operation:** We suggest that all applicants for **on-liquor** licenses be given the opportunity to apply for the hours they desire and that each applicant is treated on its merits. The current Sale of Liquor Act does not stipulate any hours that licensed premises should be closed. Under the Act all applications for new and renewal of liquor licenses must be advertised twice. The public has every opportunity to object to a license application or renewal. If there is a problem with an application or licensee, the Police can bring prosecutions and both the Police and the Licensing Inspector can apply to the Liquor Licensing Authority for a license to be suspended or cancelled.
 - **Off-Licence** sales on the other hand, regardless of the venue of the off licence, provide alcohol directly to the public with little or no opportunity for the licensee to intervene or control the consumption or on supply. For these reasons there is strong political favour to limit the house of off-licence sales to occur before 10pm only.

Recommendation: That Council has a Liquor Licensing policy permitting all applicants for on-licenses to apply for the hours they desire and that each application is considers on its merits.

Recommendation: The Gisborne Branch of HANZ supports the limited hours for off-licence trade in the draft policy

- One way door proposition: We suggest that conditional 2am one way door policy be deleted. HANZ has supported this type of policy in many areas and indeed was involved in its initial creation. Further Some HANZ branches have undertaken in-depth discussion with liquor agencies that have resulted in the deletion of the wholesale inappropriate application of this style of policy in favour of more effective and appropriate local solutions – a 1-way door policy is NOT the answer to all liquor problems. Additionally, a policy such as this takes complete buy-in from all licensees and inclusion in a local liquor policy may hinder the process. We ask that the on-licensees make this decision themselves.

Recommendation: that Council deletes the recommended mandatory 1 way door system after 2am.

- Restriction of Restaurant style licences hours of trade: HANZ objects to the differential treatment of Tavern and restaurant style licences. The reality is that Restaurants and taverns are becoming less distinguishable. Many restaurants 'look and feel' like taverns at certain times of day as indeed Taverns "look and feel' like restaurants at others. The association has lobbied Central Government to remove the distinctions and ludicrous trading advantages afforded to different styles of licence in favour of a single ON licence that comes with a standard set of obligations

Recommendation: that Council deletes the recommended limit to restaurant trading hours.

- Club licences: as discussed above the Association objects to the unfair trading advantages of some types of liquor licence over others. Currently establishments that trade as a club have access to use gaming funds to support commercial activity. These funds would otherwise have to be distributed to the community. As long as this ludicrous situation continues it is entirely appropriate that clubs are restricted in their trade to hours that match the clubs legitimate activities.

Recommendation: That Council adopts a differential approach to club licences that identifies the genuine and appropriate planned activities and restricts the sale of liquor to match these hours.

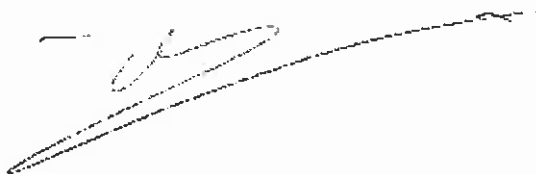
- Expansion of Special licence criteria: No Comment
- Formalisation of existing process. In many sections there is repeated reference to conditions, processes and restrictions already outlined in the Sale of Liquor Act (1989) (SOLA). The inclusion of these references is in the first instance a redundancy, secondly obscures the intention and interpretation of the policy and finally may well tie this policy to details of an act that is extremely likely to be repealed later this year.
 - *For example policy 2.3 appears to be a rewording of SOLA section 13 much as policy 5.3 appears to be a rewording of SOLA section 79*

Recommendation: Reference to provisions already provided for by the Sale of Liquor Act (1989) be removed.

Thank you for considering the views of the Gisborne Branch of the Hospitality Association.

We would like to make an oral submission.

Chris Hince



**Regional Manager
Hospitality Association of NZ**



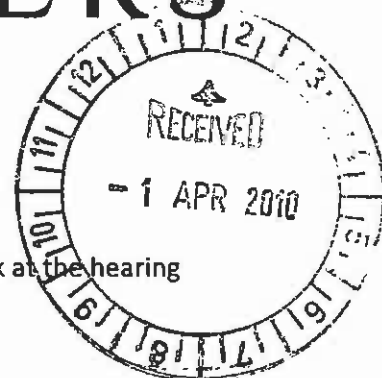
Hospitality Association of New Zealand

Gisborne Branch

Contact: chris.hince@hanz.org.nz or 027 446 5665



THE FETTUCCINE BROTHERS 2007



Attention: To Whom It May Concern

Re : Submission for the review of The Sale of Liquor Policy and a request to speak at the hearing

Date : 29/03/10

From : Grant Bailey & Anez Barnes, Proprietors of The Fettuccine Brothers Restaurant

Contact : (06) 8685700 or 0210546691

Dear Sir/Madam,

We wish to strongly object to one part of the proposed update for councils sale of liquor policy, namely "to limit the maximum trading hour of premises that hold a restaurant-style on-licence to 1am"

We object to this on the following basis and trust you will seriously consider this information when making your decision. Please feel free to contact us with any questions about the following.

From an equal employment opportunities basis....

For those of us that are dedicated night time only operations, you should be made aware that the majority of restaurant service staff commence their shifts around 6.30 – 7pm, sometimes later during the tourist season/daylight savings etc. By limiting our operating hours you are inadvertently restricting any potential of full time work in our sector. This will turn dedicated staff not only away from hospitality careers in general but also in particular from the smaller communities. Other industries can employ staff from 9-5 (8hours a day) or earlier/later, and society bases itself around the 40hr week . If our staff work from 7pm until only 1am they can only ever hope to achieve a 6hr work day. This is unjust and extremely damaging to the future of the Restaurant Industry and the need we already have for more skilled workers amongst us.

From a Perspective of Sale Ability and Growth in the Gisborne Restaurant Market...

Reducing the gross profit potential of restaurants in relation to their operating hours, or limiting their night time activity will prevent buyers from considering purchasing a restaurant locally compared to other larger cities. At present, night life and growth potential are more prevalent in larger cities. We all need at least the same locally, particularly during times of recession such as the next year or two. We need more out of town operators to see potential for expansion in the local sector and to allow them the freedom to bring their ideas and experience to the smaller communities of New Zealand, not just the big cities. If it is

too obvious that there is no access or demand for growth, who is going to buy here? What future potential operators are we likely to attract to Gisborne?

During the Time of a Recession and our Avenues of Future Growth...

Now that Gisborne is feeling the effects of a recession, our sector needs to be able to diversify and compete fairly with businesses offering similar products and/or recreation. Alcohol sales (25%) are our secondary income to food (75%), but still very important to the sustainability of our industry. If other social meeting places providing alcohol are issued with 3am licenses and one-way door policies, we should be allowed to have this option as well. Restaurants will definitely need this option available if the recession continues to dig deeper. Live music and entertainment are avenues restaurants are adopting to attract new customers. However, unlike bars and nightclubs, this is in a safe and pleasant environment for our customers. This mature environment provided by Restaurants is essential to the discerning clientele. Why should they be forced to leave this environment with no other options apart from either moving on to a crowded young nightclub or to have to go home at 1am? And as for special licenses, who is going to pay for them when other businesses can offer to stay open longer for private functions at no extra charge.

In Regards to Liquor Abuse in the City and the Demographic of Abusers...

We strongly agree that there is obvious abuse regarding the sale and consumption of liquor. We also agree in principal with the new policies to deal with this yet, we need to ask the question of who is actually abusing it? A restaurant's primary source of income is food, not alcohol, but for us the two are equally as important to our customers demographic. If we look closer we will find that venues where alcohol is the primary source of income and their demographic are actually responsible for that abuse.

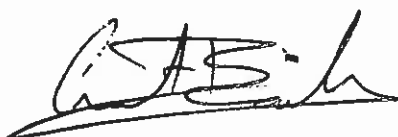
How many restaurants have had fights break out in them? How many restaurants have been caught with underage drinkers on the premises disregarding the law? How many times have police or ambulances been called out to a restaurant? How many times has a restaurant been shut down for incidents relating to the sale and supply of liquor? I have included the request to speak at your hearing so a C.E.O from the Restaurant Association of New Zealand can speak on our behalf to provide more facts and figures on these questions. We want to distinguish ourselves from pubs, clubs and other venues that serve alcohol with little regard for policy.

Summary...

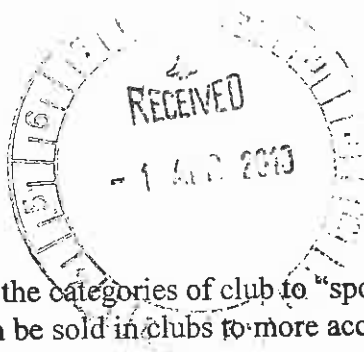
Overall, we believe we are unfairly being categorised with other outlets that provide a very different environment. We also believe that those outlets will not risk their profits for the sake of upholding the law like restaurants do. Our demographic demands a better, cleaner, safer environment to socialise in which is what we take great pride in offering. We do not think restaurants should have any inclusion in the future policy changes without any incidents that have been brought to our attention to suggest that there have been any problems under the current policy. If you have any documentation contrary to this, please talk with us about them first. I am sure you will find they are isolated incidents and they should be dealt with on an individual basis. This needs to be considered before we make "an across the board policy change" that will greatly affect the majority of professional operators, future growth, sale ability and our mature minded staff's employment in restaurants.

Yours sincerely,

Grant Bailey and Anez Barnes. Owner/operators of The Fettuccine Brothers Restaurant, Advocate of The Hospitality Sector and Current Holder of a 3am On-License.



Rangatira Tavern & Events Centre
26 Library Rd
Te Karaka
(06) 8623088 / 0276257676



144735

Policy referring to the simplifying the categories of club to "sports" and "other", and reduce the trading hours liquor can be sold in clubs to more accurately reflect club activities.

I Ailsa Fleming, the proprietor of the above business would like to submit a proposal against the hour's granted to Te Karaka Bowling Club. Maybe there is a special exemption for this club to have their trading hour's granted. I definitely no that this club trades 7days a week and also when no activities are not in progress. Also with the closure of all hospitality outlets who cannot trade during compulsory holiday's, why is this club allowed to trade. eg. Xmas day. Is it or isn't it mandatory throughout the country for all liquor outlets to be closed on that day. I am very surprised to find that this club is able to trade during compulsory statutory holiday's. Please clarify to me the ruling's and exemption's of hour's allowed for such sporting club's and other's.

I am in support of the reducing the hour's of trading of sports clubs and other, duly due to the patronage to our business named above. There are 2 sports club in the township of Te Karaka which most people who reside here consume liquor at the cheapest outlets stated. The Rangatira rugby club only trades during rugby season which is understandable, so maybe reducing the hours of trading of the Bowling Club could have an impact of support to the tavern.

I would like to thank G.D.L.A. for giving us the opportunity to have our say.

Yours Faithfully


(A Fleming)



FOODSTUFFS
AUCKLAND LIMITED

**SUBMISSION TO THE
GISBORNE DISTRICT COUNCIL**

ON THE

**GISBORNE DISTRICT LICENSING AGENCY
SALE OF LIQUOR POLICY**

BY

FOODSTUFFS (AUCKLAND) LIMITED

March 2010

Gisborne District Licensing Agency – Sale of Liquor Policy

Introduction

This submission is made by Foodstuffs (Auckland) Ltd. Foodstuffs (Auckland) Ltd together with Foodstuffs (Wellington) Co-op Soc. Ltd and Foodstuffs South Island Ltd, under the umbrella of Foodstuffs (NZ) Ltd, jointly own the trademarks, New World, PAK'nSAVE, Four Square, Duffy & Finn, Henry's Beer Wine and Spirits and Liquorland, and franchises grocery and specialist liquor stores under these brand names. Further background information on Foodstuffs is outlined in Appendix 1.

Foodstuffs sets high standards for retail franchisees and the organisation prides itself as a responsible corporate citizen. This extends to a very deliberate approach to the responsible retailing of alcohol.

Foodstuffs (Auckland) Ltd does not request the opportunity to make an oral submission to the Council.

Our submission is limited to two topics as follows;

Hours of Operation- Policy 3.1

Foodstuffs endorses Council's continuation of the 9am – 11pm (and 9am -12 midnight for non-residential areas) hours of operation window for off-licences supported by considering each application on its merits with respect to any extension of these hours. We would also support any move to 8am -10pm hours as preferred by the Law Commission in its preliminary report Alcohol in Our Lives July 2009 [Para's 9.166 and 12.27].

The opportunity and ability to align opening hours and off-licence hours, to the extent that doing so remains consistent with the Objective of the Sale of Liquor Act and the GDLA's policy Objectives, is very important to our Operators as we seek to provide the very best overall foodstuffs goods shopping experience to our customers.

Renewal of Off Licences- Policy 3.5

We question whether it is correct for the Policy 3.5 to apply criteria under which the GDLA must consider an application for renewal. Our understanding of section 44 of the Sale of Liquor Act is that unopposed applications for renewals that do not seek a variation must be granted and that opposed applications must be forwarded to the Liquor Licensing Authority. If this understanding is correct then the GDLA has no discretion in these matters.

The criteria may of course be applied to Inspectors for their consideration when reporting on renewals and to unopposed renewals seeking a variation of conditions.

If you have any questions regarding this submission please contact;

Mike Brooker
Group Solicitor
Foodstuffs (Auckland) Limited
Phone: 09 621 0600 | Facsimile: 09 621 0601 | Direct Phone: 09 621 1239 | Mobile: 027 255 5744
Foodstuffs (Auckland) Limited, 60 Roma Rd | DX Box CX 15021, Mount Roskill, Auckland 1440, New Zealand

Background on Foodstuffs

Appendix 1

Foodstuffs is involved in grocery warehousing, distribution and retailing.

The grocery retailing operations are structured to cover the major retailing segments in the grocery market. They include 133 full service supermarkets that trade under the name New World; 48 foodbarns/retail food warehouses that trade under the names PAK'nSAVE or Write Price; and 283 conventional main order stores that trade under the name Four Square.

All Foodstuffs supermarkets and Four Square stores, except those operating in Licensing Trust areas, hold liquor licences to sell beer and wine.

Our grocery stores sell beer and wine as a complement to the purchase of foodstuffs. Consumer research confirms that consumers very much enjoy the convenience of being able to purchase beer and wine with their food purchases and many take advantage of this opportunity. Nationally one in every six supermarket transactions includes beer and/or wine.

In the vast majority of cases alcohol is purchased in conjunction with other groceries. Liquor only sales represent a little more than 1% of all our supermarket transactions.

Foodstuffs also own the rights in specialist liquor brands and franchises stores in the specialist liquor sector: 3 Duffy & Finn stores, 17 Henry's Beer Wine and Spirit's stores, and 71 Liquorland stores.

**SUBMISSION ON THE DRAFT GISBORNE DISTRICT LICENSING AGENCY-
SALE OF LIQUOR POLICY ON BEHALF OF PROGRESSIVE ENTERPRISES
LIMITED**



PROGRESSIVE

Rachael Keenan (Senior Commercial Lawyer)
Progressive Enterprises Ltd
80 Favona Rd Favona Otahuhu
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Progressive Enterprises Ltd
Property Department
80 Favona Road
Mangere Auckland
Tel 09 275 2788
Fax 09 255 2179
Private Bag 93306
Otahuhu Auckland 1133
New Zealand

Progressive Enterprises Limited's submission relates to the Draft Gisborne District Licensing Agency-Sale of Liquor Policy and its impact on our operations (in particular on our supermarket stores trading under the brands of Countdown, Woolworths, Foodtown, SuperValue and FreshChoice).

Introduction

1. Progressive Enterprises Limited ("Progressive") is one of New Zealand's leading retail operators. Progressive employs some 19,000 people nationwide within 151 supermarkets trading under the Countdown, Foodtown and Woolworths brands. Progressive is also the franchise coordinator for the Fresh Choice and SuperValue brands. Within our supermarkets Progressive provides a beer and wine only offering to our customers.
2. Progressive actively supports the responsible regulation and control of alcohol sales pursuant to properly issued liquor licences and within the terms of the Sale of Liquor Act 1989 ("the Act"). Our Intention is to establish ourselves as an industry leader in the responsible supply of alcoholic beverages. Coupled with this we support the harm minimisation objectives set out in the Alcohol Harm Reduction Strategy aimed at reducing the misuse of alcohol in our society.
3. Progressive is a responsible provider of alcohol to the public and takes its role as an off licence holder seriously. We support the initiative taken by the Gisborne DLA in developing a Local Alcohol Policy and we are willing to work closely with the DLA to ensure ongoing compliance with the Act in terms of off licence sales from our various premises.
4. Progressive's primary submission in response to the Draft Policy is that any policy framework for the supply of alcohol needs to have harm minimisation as its central objective but should also recognise the positive contribution that the industry makes to the economic and social fabric of the communities in which it operates. Any policy framework should strike a balance between the

WE ARE THE RIGHT
CHOICE

New Zealand's supermarket operator of choice for customers, our people, suppliers and investors.

necessary regulation of the supply of alcohol products and the provision of consistency and certainty so that the industry can conduct business responsibly and free of unreasonable regulatory burden and cost.

5. Progressive is largely supportive of the policy statements set out in the Draft Policy. We also acknowledge and support the Draft Policy's adherence and acknowledgement of the Act and its objectives. Accordingly Progressive only wishes to comment on section 3 as follows:

Section 3 (B) Hours of Operation

6. Progressive believes that supermarket off licence hours should where possible mirror trading hours for consistency. Progressive has recently reduced off licence hours for all its 24 hour stores to 1am.
7. Progressive opposes Local Alcohol Policies determining hours of sale for each territory on the basis that this will lead to inconsistency and a concern that residents will travel out of town to purchase and consume alcohol. This will cause inconvenience to those customers and may even result in greater instances of drunk driving. Accordingly it is vital that any reduction in hours take place consistently on a national rather than local or regional basis. For this reason Progressive opposes liquor licensing hours for supermarkets being reduced to 9.00am – 11.00pm.
8. We also note the following:
 - There is no compelling study that proves that longer trading hours for off licensed supermarkets will result in alcohol abuse. At paragraph 9.45 of the Law Commission Report titled *Alcohol In Our Lives* there is a reference to alcohol consumption tracking downward when the number of licensed premises doubled following the introduction of the Act in 1989.
 - Supermarkets present far less risk in respect of sale of alcohol to minors or intoxicated persons than other licensed premises owing to their adherence to responsible practices for the sale of alcohol. Supermarkets' position as a responsible retailer is exemplified by their compliance with and enforcement of strict alcohol policies, product offering of wine and beer only, nature of the premises including lighting, CCTV and security and transaction procedure which includes supervisor override at check-outs. Further, owing to lighting and check out positioning it is easier to identify under age and intoxicated customers.
 - Reducing hours of purchase at the start of the day from 6am to 9am for supermarkets is unlikely to alleviate alcohol abuse. Supermarkets provide a wine and beer offering only which is not associated with hardened liquor abuse.

Further, it is often workers and mothers carrying out their weekly grocery shop in the early morning who purchase wine and/or beer as part of that weekly household shop who will be affected. Progressive has received a number of complaints from residents who shop at Pukekohe South in respect of their inability to purchase wine and beer between the hours of 6am and 10am. Clearly reduction of morning hours is not an initiative that all residents and customers will support.

- Reducing hours of purchase at the end of the day from 1am to 11pm also provides unreasonable constraints on responsible purchasers and consumers of alcohol, particularly those who are shift workers or customers who prefer the peace and quiet of shopping later in the evening and who wish to purchase alcohol as part of their household grocery shop. Our customer purchase behaviour data indicates that less than 1.8% of our baskets contain beer and wine only. This is an extremely small percentage which proves that most alcohol is purchased as part of the average household grocery shop. Again reducing hours at the end of the day is unlikely to be viewed favourably by those customers affected.
9. Notwithstanding some of our current maximum licensing hours, owing to our policy of being a responsible retailer we have implemented a national policy of reducing our maximum off license trading hours to 1am for all our supermarkets including our 24 hour supermarkets. It is our position that where possible, licensing hours should reflect our trading hours to ensure national consistency. Progressive also recognises that there may be particular areas which could be considered high risk in respect of proven alcohol abuse and alcohol related harm. Progressive has been and continues to be willing to work with DLAs, Councils and the Police to address such problems and may on an exception basis adjust trading hours and impose private liquor bans in areas which we control. Progressive's parent company has previously worked with police and local authorities in high risk remote areas where there is recognised significant alcohol abuse. Progressive has also worked with local Councils and the police to implement liquor bans in its private car parks and shorter off license trading hours where necessary.
10. We refer to the *Note* at section 3.2 referencing District Plan and the implied potential impact licensed premises hours may have on residential and non residential areas. This is a matter which should be dealt with by the District Plan and the experienced planning arm of Council subject to the provisions of the RMA. The DLA and in particular the Chief Environmental Health Officer should not be solely responsible for making such determinations.

Section 3.2 Policy –Supervised/Restricted Designations for Stand Alone Off Licensed Premises

11. Progressive submits that supermarkets as stand alone off license premises should not be subject to a policy requiring them to hold either a supervised or restricted designation as such a designation is not workable for a supermarket.
12. Supermarkets provide open access to adults and children and as such the entire supermarket area is licensed. Further this is necessary so that the actual sale of beer and wine can be facilitated through the check outs which are situated in an open access area. Accordingly to designate a certain area of the supermarket as supervised or restricted is not practically workable.
13. Progressive notes that all sale of beer and wine is now subject to supervisor override and to that extent is supervised.

Submission: Progressive does not support licensing hours being reduced from 6am – 12am for supermarkets (based on our existing licensed hours) on the grounds that it will create inconsistency for national operators. Progressive submits hours for off licensed supermarket premises generally should be from 6am – 1am but in the case of Gisborne is prepared to accept current licensed hours of 6am – 12am.

Submission: Progressive opposes stand alone supermarket off license premises being subject to either a supervised or restricted designation.

Section 3(D) Exchange of Information with Licensees

14. Progressive welcomes the opportunity to liaise with other licensees and the GDLA. We would very much like to be involved in regular consultation as part of LARA

Submission: Progressive supports section 3.4 and confirms it will attend meetings to discuss matters relating to the enforcement of the Sale of Liquor Act (or such other future legislation and regulation which may apply)

15. **Section (E) Renewal of Off Licenses**

We refer to the criteria to be taken into account on renewal set out at section 3.5.1 and note the following in respect of section 3.5.1 (ii) (adverse environmental impact) and 3.5.1(iii) (affected parties):

- The Act does not give discretion to either the DLAs or the LLA to refuse to grant or renew a license on the basis of adverse environmental impacts. Whilst Progressive is cognisant of minimising adverse environmental effects this

function should be dealt with by the District Plan and the experienced planning arm of Council subject to the provisions of the RMA.

- Any adverse environmental impact of a supermarket development is assessed by Council in the early stages of development under the RMA by experts to ensure such development is appropriate. If these impacts have to be addressed for grants or renewals (as proposed by the Draft Policy) there is redundancy of process and potential for inconsistent outcomes. Further, by that stage the supermarket will have already been built as the result of millions of dollars of investment in the community. To impose adverse environmental impacts at that late stage as a further condition of renewal could result in halted development, uncertainty and even potential relocation of supermarkets out of Gisborne which will inevitably lead to uncertainty and inconvenience for customers.
- Progressive suggests that the reference to "*affected parties*" should be afforded the same interpretation as that given under the Resource Management Act.

Submission: Progressive does not support off licence renewals (or initial applications) being subject to a condition for consideration of any "*adverse environmental impact*". Progressive submits that any adverse environmental impacts should be dealt with by the District Plan and the experienced planning arm of Council subject to the provisions of the Resource Management Act.

Submission: Progressive submits that the condition referring to any concerns raised by affected parties should define '*affected parties*' in the same manner as the Resource Management Act.

Section (G) Supermarkets- Off Licenses

16. Progressive supports the criteria for off licenses being applied to supermarkets. However for the reasons stated above at paragraphs 10 and 15 Progressive opposes the DLA being granted discretion to consider "*any environmental or other effects*". The DLA does not have the requisite experience or resource to make determinations which are dealt with by the Resource Management Act and other Council functions and processes. Further, any consideration would occur too late in the development process which could cause costly delay or even the halting of investment in such a development project.
17. The reference to "*other effects*" is broad and undefined and as such has the potential to create unnecessary cost, confusion and delay for Council, supermarkets and the community.

Submission: Progressive does not support supermarket off licences being subject to consideration by the DLA to a condition of creating any "environmental or other effects". Progressive submits that any created environmental effects should be dealt with by the District Plan and the experienced planning arm of Council subject to the provisions of the Resource Management Act not the DLA.

Submission: Progressive further submits that the reference to "or other effects" should be deleted on the grounds of ambiguity.

Section (I) Host Responsibility

18. Progressive supports the Draft Policy requesting all off licensees to develop, promote and publish a Host Responsibility Policy.

Submission: Progressive supports off licensees having their own Host Responsibility Policy.

General

Progressive supports all other policy statements made in the Draft Policy relevant to it as a supermarket off license holder excepting those specifically referred to above.

Progressive wishes to be heard in support of this submission.

Sale of liquor submission

My submission on the review of the Gisborne District Licensing Agency Sale of Liquor Policy.

full name

Roger Faber

organisation (if applicable)

Gisborne Tatapouri Sport

postal address

po box 693

daytime phone

068674618

email

rogerccgis@xtra.co.nz

admin@gis.tatapouri.co.nz

Do you wish to speak to the hearings committee on 4 May about your submission?

- no
- yes

This is what I think about the changes to the policy

As President of the above club my committee and I feel the plan is totally unnecessary as we run a club which does not have problems due to the controlled environment and rules that our club runs under. We have 3000 members, 1500 of which are full fishing members and 1500 which are associate members who don't regular fish. Both groups use the clubrooms as a place to go to dine, take their family, watch sport on the big screen and enjoy the location over looking the harbour.

We run regular events for the entertainment of our members including bands, live sports, guest speakers and fishing tournaments.

The club is frequently hired for functions by our members e.g. weddings, family reunions, birthdays, work/staff gatherings, prize giving's. These events ~~often~~ ~~often~~ ~~often~~ often run ~~late~~ late into the ~~night~~ evenings.

A.M. Allen



Type the two words:



Please answer the captcha question

submit

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ENR050
EOP 72468

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6th October 2008

Attn: Angela Joe
Louise Bennett
Judith Robertson
Tracey Panton

Gisborne District Licensing Agency
C/- Gisborne District Council
Box 747
GISBORNE

Dear Madam(s)

There has been a strong call from District Councils for submissions for a draft Alcohol Policy. Your council has either called for submissions or are about to call for submissions.

All 42 branches of The Mill Liquorsave have an off premise Liquor Licence in your area or are looking to open a Liquor Store in your area and we respectfully wish to submit the attached submission.

The Mill Liquorsave has for some time had a strong compliance program under the sale of Liquor Act. This compliance procedure has come at a cost to the company.

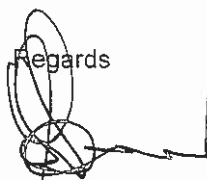
While the attached submission show we are not perfect the program sets out the cost to our business.

We strongly believe that this compliance program should be standard in both on and off premise and be funded by some sort of levy which is either administered by yourself or an Independent body. This program should be used as an educational program and be removed from the normal stings operated by yourself and Police.

Either I or a representative of our company is happy to discuss this in person.

Thank you for receiving this submission.

Please contact me should you have any other query.

Regards


Stephen Fromont
General Manager

The Mill Liquorsave

Liquor Submission

Author – Stephen Fromont - General Manager
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DDI 06 7698331 ~ 0274 462 926



2002

- 2002 - We thought we had Compliance under Control.
- Supermarkets had Beer and Wine.
- However as promised, Stings were ramped up and we failed the test.
- We had to set a new Compliance Program.



Mystery Shopper Program

- In late 2000, We started our Mystery Shopper Program (MS).
- In conjunction with other Retailers we set an Independent Program to Shop our Stores.
- In that Time we have had 2,015 - MS visits.
- We have a 78.31% Success Rate



Mystery Shopper Program

- There have been 437 Failures.
- There has been 437 Disciplinary Meetings
- With 437 Punishments under Employment Contracts.



Employment Contracts

- In our Employment Contract it is 'Serious Misconduct' to Serve under 18 years old.
- It is Misconduct not to I.D. people under 25 years old.
- In each case since 2000 where proof has been shown of 'Serious Misconduct' a termination has Occurred.



Staff Support

- All Staff must Complete a 'SOL Workbook' before starting on Tills.
- This book contains TMLS under 25 Policy.
- Employment Contract with Misconduct Section is also Compulsory.
- When Staff Start they get copy of Employee Hand Book.



Refresher Course

- All Staff must Complete a Refresher Course once a Year.
- Staff Must get 100% in these Standards.



Point Of Sale

- Each day Staff must sign on to Tills
- Before commencement of shift, a Prompt comes up asking staff if they understand their Responsibilities under the Act.
- Staff must accept these Terms before they Start Work.



Point of Sale.

- Before Every Sale is Completed till staff are asked if Customer is over 25 years old.
- If No, then Employee must enter D.O.B.
- D.O.B. must be from approved ID Source.
- D.O.B must be confirmed by the sight of approved evidence of Age Document.



Staff Meetings

- Managers must have Monthly Staff Meetings.
- These Meetings Discuss Monthly Mystery Shopper.
- Meetings show Staff Performance on I.D. from Till Receipts.
- Staff are Encouraged to Role Model.



Security

- All Stores have Security Cameras
- All Large Stores Have Security at Key Times.
- Mostly, Security are Mill Staff.



Annual Cost Of Program

Mystery Shopper Program	\$	35,000
Regional Mangers Time	\$	19,000
H.O. Admin. For Support of Program	\$	10,000
Maintenance of POS Reports	\$	50,000
	\$	114,000



Summary

- Cost of Compliance of SOL and other NZ statutes makes TMLS uncompetitive in certain Areas
- We are serious about this compliance program.
- Our Plan was to close Stores rather than Compromise the Program.



Con't Summary

- We Believe the whole Industry Should Comply to a Program.
- There should be a standard Format.
- We Believe there should be a Cost to Each Liquor Store Administer by an Independent Body.
- This should be an educational cost rather than a sting cost.



Con't Summary

- Software and Employment Issues are Individual Responsibility
- However Mystery Shopper Program could be universal.

