



# Master Grocers Australia Ltd

Trading as:

**MGA Independent Retailers &  
MGA Liquor**

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Victorian Review of the  
Liquor Control Reform Act 1998

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Submission Paper

December 2016

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## **Submission by Master Grocers Australia (MGA Independent Retailers) to the Victorian Review of the Liquor Control Act 1998**

**December 2016**

### **Introduction**

MGA Independent Retailers (MGA) is a National Employer Industry organisation representing the owners and operators of independently owned and operated Grocery and Liquor Supermarkets and stores in all States and Territories of Australia trading under brand names, such as; FoodWorks, Friendly Grocers, IGA, Bottlemart, Cellarbrations, Ritchies Liquor, The Bottle O and various independents. They range in size from small, to medium and large businesses.

Independently owned and operated licensed Supermarkets and stores play a major role in the retail industry and make a substantial contribution to the communities in which they trade.

In Australia, MGA's 2,700 members independently owned branded supermarkets and liquor stores employ over 115,000 full time, part time and casual staff, representing \$14 billion in retail sales. Many MGA members are small family businesses, employing 25 or fewer staff.

In Victoria, MGA's members comprise 850 independently owned and operated licensed supermarkets and liquor stores employing over 27,000 full time, part time and casual staff, representing \$5 billion in retail sales.

MGA is making this submission in response to the Victorian Review of the Liquor Reform Act 1998 paper (The Review), released by the Minister for Consumer Affairs, Gaming and Liquor Regulation, the Hon Marlene Kairouz MP for the Victorian Government. The purpose of this review is to revisit the objectives of the Act and to ascertain whether the objectives are being met in regard to the minimisation of harm associated with the use of alcohol and to consider the role of the Act (if any) in assisting to help the reduction of domestic family violence in Victoria.

MGA understands that strategies to minimise any harm associated with the misuse of alcohol is of the utmost importance and strongly supports initiatives to assist in reducing the incidents of family violence. MGA welcomes the opportunity to respond to this paper and will make suggestions to "tidy up" the Act, as well as make suggestions to help remove anomalies, unfair and outdated regulations and reduce red tape and cost burdens

MGA thanks the Honourable Minister Marlene Kairouz MP and the Victorian Government for the opportunity to comment on this important Review of the Liquor Control Reform Act 1998.

## **Victorian Packaged Liquor Retail Market**

Victoria has the most competitive, diverse and most regulated retail packaged liquor sector in Australia, comprising of small and medium local stores and large format “destination” stores with significant sales turnover.

The Victorian packaged liquor retail sector comprises a large and robust independent owner operator segment. Additionally, there are large corporations including Wesfarmers (Coles Liquor, Liquorland & 1<sup>st</sup> Choice) and Woolworths (Woolworths Liquor, Beer Wine & Spirits – BWS & Dan Murphy) and ALDI.

There are many medium and large sized hotels which operate under General Liquor Licenses which also sell significant quantities of packaged liquor through their “Drive Through” and Bottle Shop departments.

As at November 2016 there were 2,033 Victorian packaged licenses contributing significantly to the Victorian economy by generating total liquor sales of \$3.896b and directly employing approximately 14,321 people. The packaged liquor sector supports and actively promotes many local Victorian based businesses including; wine growers, local brewers and local distillers which also provide significant employment and economic benefits in the communities in which they operate.

The packaged liquor sector has undergone significant deregulation over the past thirty years. In 1986 Dr John Nieuwenhuysen released his report addressing the Liquor Control Act of 1968 to the then Cain Government. The 800 plus page review made 184 recommendations for change of which 167 were accepted, this took Victoria from having the most restrictive liquor licensing laws to the most liberal with six license types to replace the previous twenty-nine. The number of liquor licenses types has increased to thirteen in 2016.

The next major change occurred in 1998 when the Brack’s Government commissioned the review of section 23 of the Liquor Control Reform Act 1998 which restricted a person or corporation from holding more than 8% of the total number of packaged liquor licences in the state. This was known as the ‘8% Rule’ or “licence cap”. After a lengthy consultation period by the independent packaged liquor sector which submitted a strong contrary opinion, represented by the then Master Grocers Association of Victoria (MGAV) and the Liquor Stores Association Victoria (LSAV), the report recommended the lifting and eventual “scrapping”

of the '8% Rule' by percentage increments from the year 2000 with complete deregulation of a packaged liquor license cap by 2003. This initiative was largely driven by the 2 major Chains Coles and Woolworths.

This resulted in a staggering increase in Victorian packaged liquor licenses from 1,291 at 30<sup>th</sup> June 1998 to 2,039 at 30<sup>th</sup> June 2016. The total number of packaged liquor licenses has increased by 58% mainly due to the "tsunami" of packaged liquor licenses that were issued to the 2 major chains over the past 15 years since deregulation of the cap. These 2 major corporations, now dominate with more than 75% market share of packaged liquor sales in Victoria

## Key Review Considerations

As the Liquor Control Reform Act 1998 (the LCRA) regulates the supply of liquor in Victoria, MGA submits that the objects of the Act consider the following;

- a. must treat all like for like liquor license propositions (routes to market) equally when addressing the setting of risk based liquor license fees, trading hours and various compliance requirements.*
- b. assess risk based liquor licence fees, based on size and scope of the packaged liquor business*
- c. appropriate screening and training be required for all new entrants / applicants when considering the granting of a packaged liquor license.*
- d. ensure the Act continues to promote the supply of packaged liquor in a responsible manner that minimises any harm associated with the misuse of alcohol including the incidents of family violence.*
- e. minimises regulatory burdens and compliance costs for businesses.*

## The Review

The Review paper addresses the following two areas in order to assess the relevance and effectiveness of the Liquor Control Reform Act 1998;

1. Facilitating a diverse industry and reducing red tape
2. Harm minimisation

MGA will address specific numbered points as set out in the Review paper

## Facilitating a diverse industry and reducing red tape

### 2.1.1 Exemptions from the requirement to hold a license

*‘LCRA exempts some types of supply from the requirement to hold a license, provided the liquor is supplied in accordance with the requirements imposed by the LCRA or the regulations’*

MGA supports exempting certain business categories from holding a liquor license such as Bed and Breakfast operators and Hairdressers where hospitality can be experienced and alcohol can be consumed on premise. MGA also supports exempting Florists and Gift Services where liquor sales are gifted and are mostly delivered the next day. Hospitals, residential care services and retirement villages should also be exempt from holding a liquor licence.

There is a risk of some businesses, (butchers for example), that begin with offering a passive “value add” service by providing local wines with local meats and produce that have evolved into a “quasi” retailer of local wines. Butchers are entitled to sell 1.5 litres of packaged alcohol per customer with their meat or food purchase to be consumed off premise. MGA submits that such outlets should be required to hold a packaged liquor license.

Businesses of this nature, which are capable of selling significant volumes of local wines, are not monitored for compliance by the VCGLR as they are not required to have a packaged liquor licence or a special class of liquor licence.

Although the penalty of either a \$35k fine or two years imprisonment for not meeting their exempt criteria is a hefty deterrent, there is a question to be asked, “as businesses such as this example are not required to notify the VCGLR of their intent to supply liquor, who then ensures these businesses meet their exemption criteria.”

### 2.1.3 Issues with the licensing regime

*“LCRA creates obligations that apply to all licences or to all licences of a particular type”*

MGA supports a sustainable, diverse and competitive packaged liquor sector. However, MGA does not support the current Victorian risk based liquor licence fee structure and trading hour inconsistencies that discriminate against one liquor license from another. Examples as noted below show other liquor license types (General) promote and sell packaged liquor to be consumed off premise and pay a much lower risk based licence fee and they operate additional trading hours that packaged liquor licensees cannot trade,

unless packaged licensees pay a significant additional fee to vary their liquor license and only after demonstrating “extenuating” circumstances.

Eg. 1. Victorian township of Anglesea – The Hotel (General Licence - \$948.10) drive through bottleshop is able to operate between 7am and 11pm - 6 days per week, as well as Good Friday and Christmas day, whilst the local licensed supermarket, which pays double the amount \$1,896.00 for his liquor license must pay an additional \$3,792.10 to vary his liquor license to trade between 7am and 9am 7 days per week and also on Good Friday and Christmas day.

Eg. 2 –Some Dan Murphy “big barn” packaged liquor outlets selling significant quantities of packaged liquor operate from General liquor license sites, such as Alphington, Malvern, Mulgrave and Burwood and more, and they pay the same fee as a packaged liquor licence but, can trade General licence trading hours, without showing “extenuating” circumstances.

Eg. 3 – There are also some very large Hotels (General Liquor Licenses) Drive Through Bottleshops with significant packed liquor sales such as the Mitcham Hotel, Blackburn Hotel, Village Green Hotel and Zagames Hotel.

## Conditions of Licence Type

### General Licence

A general license authorises the supply of liquor for consumption both on and **off the licensed premises**

### Renewable Limited Licenses - internet vendors

A renewable limited licence authorises the supply of **packaged liquor** in circumstances where the scale and scope of the supply is substantially restricted or limited, although they can trade in all the liquor categories of wine, beer, spirits and ready to drink. The various ways in which the supply may be limited include the; Range of products, customers, hours, size of premises and means of delivery.

### Wine and Beer Producers Licence

A Wine and Beer Producer’s licence authorises the licensee's own product/s to be made available directly to liquor wholesalers and retailers. This liquor license also allows for sample and sale directly to the public as well as by orders placed by email, telephone, facsimile transmission, internet or other electronic communication for consumption off premise.

## Annual Packaged Liquor Licence fees and Trading hours - 2016

Licence Type	Base Fee	Outside Normal Operating Hours Risk Fee (if applicable)	Ordinary Hours
General Licence	\$948.10	\$1,896.00	7am to 11pm Monday – Saturday
		Applies if authorized to trade past 11.00pm	10am to 1pm - Sunday
			12noon to 11pm - Anzac Day & Good Friday
Wine & Beer Producers	\$233.40	N/A	7am to 11pm - Monday to Saturday
			10am to 11pm - Sunday, Anzac Day & Good Friday
Renewable Limited	\$233.40	N/A	No set trading hours apply. 'Applicants should specify the hours they desire in the application form'.
Packaged Liquor	\$1,896.00	\$5,688.10	9.00am to 11pm - Monday – Saturday
		Applies if authorised to trade during non-standard hours	10am to 11pm - Sunday
			12noon to 11pm - Anzac Day

Source: VCGLR Liquor licensing fact sheet – Liquor licence fees, July 2016

Although all four liquor categories sell packaged liquor to be consumed off premise there is a significant variance in risk based fees and the hours that they can operate compared to packaged liquor licenses. The comparison chart below highlights the fee inequity incurred by packaged liquor licences.

2016 Packaged Liquor Fee Comparison Chart for like trading licenses				
Liquor Licenses selling packaged liquor	Base Fee	Base Fee for Packaged Liquor	Variance \$ Val	Variance %
General	\$948.10	\$1,896.00	\$947.90	49.99%
Renewable Limited	\$233.40	\$1,896.00	\$1,662.60	87.68%
Wine & Beer Producer	\$233.40	\$1,896.00	\$1,662.60	87.68%
Trading outside normal hours	Risk Base Fee	Risk Base Fee	Variance \$ Val	Variance %
General	\$1,896.00	\$5,688.10	\$3,792.10	66.67%
Renewable Limited	\$233.40	\$5,688.10	\$5,454.70	95.89%
Wine & Beer Producer	\$233.40	\$5,688.10	\$5,454.70	95.89%

*Note - General liquor licenses that only supply liquor for consumption off the premises incur fees equivalent to a packaged liquor license, however they have an advantage of trading according to General license trading hours.*

### 2.2.1 Applying for or varying a liquor license

***“LCRA deals with applications for a liquor licence. A person who wishes to apply for a liquor licence must lodge an application with the VCGLR”***

MGA supports the current application process for applying for or varying a packaged liquor licence.

### 2.2.2 Requirement to obtain a planning permit

***“The LCRA requires an application for most types of liquor licence to provide, as part of the application, evidence that they have obtained planning permission or that planning permission is not required”***

This additional planning permit requirement was recently introduced to allow the local community and local council the opportunity to be better informed of a pending application for a new liquor licence, relocation, or transfer of an existing packaged liquor licence.

MGA agrees that the duplication in the planning permit and licencing approval process, by allowing objections and appeals under both the planning permit and the approval for the same issues (e.g. amenity concerns), can add considerable delays and costs unnecessarily, and would recommend a review of the process so that the duplications are, where possible removed.

## 2.3 Licence Renewal

MGA supports the current liquor licence renewal process as it allows a licensee a grace period to the 31<sup>st</sup> of March to rectify an unintended oversight of payment of their liquor licence due to unforeseen circumstances.

It also allows for the VCGLR to inform all parties prejudicially affected by the payment failure to renew the liquor license who then have until the 30<sup>th</sup> September to have the liquor licence renewed and transferred to them.

### *Transfer of packaged liquor licence*

There have been instances where MGA members have bought and sold their licensed supermarkets and standalone liquor stores, only to be advised on settlement day that their transfer of liquor licence has not taken place. The new owners who have taken possession of the licensed supermarket, have at times waited for 2 to 3 weeks for their transfer of liquor licenses to be approved. This impost of not being able to open the bottle shop department ultimately costs the business owner the risk of losing customers to other outlets and a significant loss of sales, vital for the sustainability of the business.

Transfers of packaged liquor licenses ought to be fast tracked to avoid delay and business stress.

## 2.4 The cost of a liquor licence

As highlighted in item “*2.1.3 Issues with the licencing regime*” MGA believes;

*“that the LCRA must treat all like for like liquor license propositions (routes to market) equally when addressing the setting of risk based liquor license fees, trading hours and various compliance requirements.”*

LCRA has identified packaged liquor licences as high risk, whether that licence has a sales turnover of \$10k or \$350k per week.

MGA submits that an outlet that has sales of \$350k per week needs to engage in continuous heavy discounting promotional activity to achieve and maintain those sales.

This was recently identified by the Barr government in the ACT, where a scaled fee structure was implemented for packaged liquor licences with Gross Annual Purchases (GLP) of \$3 million or more paid a higher fee than those that had a GLP below \$3 million.

In his press release Chief Minister Barr stated *“the proposed fee structure increases are aimed at high volume, big discount off licences that trade long hours and represent the majority of packaged liquor sales in the Territory”*.

The Hon Edward O’Donohue the liberal minister for Liquor Gaming Regulations in 2014, recommended that large supermarket-style outlets with a liquor floor space of more than 1,000m<sup>2</sup> to pay an annual \$10,000 licence fee.

In his press release minister O’Donohue stated *“We believe the biggest outlets that sell more and make more should pay more than the small local liquor stores”*

Currently in Victoria, all packaged liquor retail outlets regardless of size, turnover or profitability pay the same licence fee \$1,896.00. MGA asserts that larger supermarket type liquor outlets are through their continuous heavy discounting behaviour a greater risk and therefore they should be paying a higher licence fee than small local bottle- shops.

### 3. Harm minimisation

*‘The first object of the LCRA is to contribute to minimising harm arising from the misuse and abuse of alcohol’*

MGA and its members fully support the responsible serving and supply of liquor and have developed a voluntary Code of Conduct to assist in the minimisation of harm arising from the misuse and abuse of alcohol. MGA has developed industry policies that include;

- a) Underage Consumption of Alcohol
- b) High Risk Drinking Behaviour
- c) Young People Drinking
- d) Responsible Service of Alcohol
- e) Alcohol Fuelled Domestic Violence
- f) Alcohol and Pregnancy
- g) Alcohol product ranging guidelines

Alcohol is a legal product and is not generally associated with harm when consumed responsibly. MGA submits however, that encouraging a positive, responsible and social culture toward alcohol use in the community is generational and will not be delivered with the addition of more regulations and red tape but through a nationally co-ordinated educational process targeting young adolescents at schools and through mediums such as television, radio, press and social media platforms.

### **3.1 The licensing process**

Applying for a packaged liquor licence has a clearly defined step by step process. The key criteria for the granting of a liquor licence includes the suitability of the applicant to hold a licence, the effect that the licence would have on the community amenity of the area in which the licenced premises will be located and whether the licence would encourage the misuse and abuse of alcohol.

MGA submits that the education, training and knowledge of a packaged liquor licensee plays a large role in assisting to promote the responsible service and consumption of alcohol in the communities in which trade. MGA suggests that the liquor licensing process include a form of applicant screening to ascertain the applicant's knowledge of the industry, liquor products and their ability to communicate that knowledge with customers.

### **3.2 Liquor condition imposed by the VCGLR**

Currently as a condition of licence, all packaged liquor licence holders and their serving staff must have undertaken and successfully completed a Responsible Service of Alcohol training (RSA) course and abide by a Code of Conduct which requires the licensee to develop a House Rules Manual that clearly sets out the responsibilities and obligations of staff when selling and supplying alcohol to the public.

MGA submits that 'The House Rules Manual' is a vital tool used by our members, to encourage best practice to be carried out by their staff, to minimise alcohol related harm through the responsible service of alcohol and promoting responsible consumption of alcohol.

### **3.3 Licensee obligations**

As stated not all licensees are subject to the same harm minimisation requirements. Harm minimisation obligations will depend on the type of liquor licence the licensee holds.

Currently the LCRA requires all licences, except for limited licences\* and BYO restaurants to undertake RSA training. ( \* "face-to-face" sales are an exception)

Packaged liquor licensees must also comply with the code of conduct, although other licensees who are promoting and selling packaged liquor under a different liquor licence do not.

MGA submits that in the best interests of consistency, all liquor licences that serve liquor for consumption off premise, are encouraged to comply with a code of conduct. This requirement

would also include butcher shops, who may sell local wines for example and who are exempt from the requirement to hold a license, but can sell 1.5 litres of packaged wine or beer to each customer be consumed off premise.

### 3.4 Offences

MGA agrees that *“shaping licensee behaviour by creating offences is an important harm minimisation measure”*.

### 3.5 Demerit points and star rating

MGA submits that the demerit point and star rating system acts as an incentive for licensees to meet their compliance requirements. Substantial penalties are apportioned to liquor licensees for serious breaches of licence conditions, whilst those who comply with their obligations are rewarded with up to a 10% annual licence fee reduction.

In the interests of fostering a positive industry stakeholder approach to the responsible service of alcohol and assisting packaged liquor licensees to grow their role in the community in promoting a responsible consumption of alcohol, MGA believes that VCGLR licencing inspectors should continue to pursue compliance breaches. However MGA submits that they should demonstrate a common sense approach when addressing a minor breach, such as if an incorrect poster is being displayed in store then the inspector ought to issue a warning rather than a penalty.

### 3.6 Liquor Accords

MGA encourages packaged liquor retailers involvement with Liquor accords, and agrees that they are a strong tool for addressing local community liquor issues in a collaborative manner. MGA recommends that as part of their code of conduct packaged liquor licences are members of local liquor accords.

### 3.7 Freeze on late-night licences

No comment

### 3.8 Designated areas – banning notices and exclusion orders

No comment

### 3.9 Offences by individuals

The penalties for breaching the LCRA offences such as serving liquor to a person in a state of intoxication, supplying liquor to someone under the age of 18 by individuals are substantial and include fines not only to the individual but also the licensee, who will also incur Demerit points and a subsequent increase in their annual licence fee.

MGA believes the mandatory signage that must be displayed to comply with packaged liquor licence obligations is adequate.

Retailers use this signage as a tool to direct customers when service is refused, and it is also used as a reference tool, to defuse the risk of aggressive behaviour by the affected customer.

### **3.10 Barring orders**

Not applicable to the packaged liquor sector

### **3.11 Family violence**

Responsible consumption of alcohol by adults is a lawful and socially accepted activity which gives great economic benefit to the community with the majority of Australian adults consuming alcohol at low risk levels.

MGA deems any form of violence as appalling and unacceptable. MGA fully supports all government initiatives and policies that reduce the occurrence of family violence that is associated with the excessive consumption of liquor. MGA believes that alcohol consumption is ultimately the responsibility of the individual, however, the packaged liquor sector recognises it has a community obligation to sell and market liquor products responsibly and will continue to work with the community and government to reduce the incidence of domestic violence associated with alcohol. MGA members are more than willing to engage in initiatives that help to reduce the negative impact that alcohol abuse has on the community.

MGA recommends that liquor industry stakeholders continue to work with government to develop long term initiatives and policies to educate consumers on the short and long term negative impacts that alcohol abuse has on families in the community. Domestic violence has grown exponentially over the last decade and this often associated with alcohol abuse. MGA strongly supports any Government initiatives that are established to minimise the harmful risks to families where alcohol is used in a negative manner.

### **3.12 Compliance and Enforcement**

MGA submits that the VCGLR and Victorian Police have adequate powers to monitor and enforce the LCRA.

For example - In the case of a packaged liquor licence venue, it is becoming increasingly more difficult for store owners and their staff to identify any form of intoxication (unless blatantly obvious), as there is a minimum interaction (unlike on premise scenarios where staff have time to observe behaviour) between the server and the customer. Generally the customer self serves and uses the "Tap n Go" method of credit card payment only allowing staff a minimum engagement time to assess the condition of the customer.

MGA believes compliance officers should before issuing a penalty to the retailer for serving customers who may be intoxicated, scrutinise their assessment of these types of scenarios, and work with the retailer on strategies to avoid these scenarios in the future.

## Summary of recommendations

### Facilitating a diverse industry and reducing red tape

#### 2.1.1 Exemptions from the requirement to hold a licence

##### Recommendation

Butchers who are able to sell 1.5 litres of packaged alcohol per customer to be consumed “off premise” should be holders of a liquor license.

#### 2.2.2 Requirement to obtain a planning permit

##### Recommendation

To avoid delay and cost burdens to any person applying for a packaged liquor licence it is recommended that the VCGLR receive a liquor licence application at the same time as the planning permit application is submitted to Council.

The VCGLR is then able process the application to approval stage subject to the planning permit being approved by the relevant Council.

To coincide with the above recommendation, MGA submits that any amenity objections to Council for liquor license planning permits are simultaneously forwarded to the VCGLR for consideration in order to avoid delays after a planning permit has been approved.

#### 2.4 The cost of a liquor licence

##### Recommendation

MGA suggests that large “Barn Style” destination packaged liquor outlets, generating high sales turnover should be paying a higher liquor licence fee than low sales turnover liquor stores.

NB. Currently small packaged liquor outlets generating \$20k in sales turnover per week are paying the same liquor licence fee as a “Barn style” destination packaged liquor outlet with a sales volume of \$250 plus per week. In effect small business is subsidising large business.

## Harm minimisation

### Recommendation

MGA believes that changing people's behaviour is generational and will not come through more legislation or red tape, but through a nationally co-ordinated educational process targeting young adolescents at school and through television, radio, press and social media.

### 3.1 The licensing process

#### Recommendation

MGA submits that the education, training and knowledge of a packaged liquor licensee plays a large role in assisting to promote the responsible service and consumption of alcohol in the communities in which trade. MGA suggests that the liquor licensing process include a form of applicant screening to ascertain the applicant's knowledge of the industry, liquor products and their ability to communicate that knowledge with customers.

### 3.2 Liquor conditions imposed by the VCGLR

#### Recommendation

As MGA's members frequently use the 'House Rules Manual' (HRM) as a quick reference tool, MGA recommends increasing educational and guidance content to the HRM, including social and community issues, such as the incidents of family violence that may be caused as a consequence of the misuse of alcohol.

### 3.3 Licensee obligations

#### Recommendation

MGA submits that in the best interests of consistency, all liquor licences that serve liquor for consumption off premise, are encouraged to comply with a code of conduct. This requirement would also include butcher shops, who may sell local wines for example and who are exempt from the requirement to hold a license, but can sell 1.5 litres of packaged wine or beer to each customer to be consumed off premise.

### 3.5 Demerit points and star rating

#### Recommendation

MGA believes that VCGLR licencing inspectors should continue to pursue compliance breaches, however, MGA submits that they demonstrate a common sense approach when addressing a minor breach, such as if an incorrect poster being displayed in store where the inspector ought to issue a warning rather than a penalty.

## 3.6 Liquor Accords

### Recommendation

MGA recommends that packaged liquor licences are members of local liquor accords where applicable. This initiative could form a requirement within the packaged liquor code of conduct

## 3.11 Family violence

### Recommendation

MGA recommends that liquor industry stakeholders continue to work with government to develop long term initiatives and policies that educate consumers on the short and long term negative impacts that alcohol abuse has the risk of causing in the community.

MGA, on behalf of its members, thanks Minister for Consumer Affairs, Gaming and Liquor Regulation, the Hon Marlene Kairouz for the Victorian Government, for the opportunity to make comments and to add suggestions to the Review of the Liquor Control Reform Act 1998.

Yours sincerely,



Jos de Bruin

CEO MGA



George Kovits

President MGA Liquor