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Wednesday, 20th February 2013

Executive Officer
Liquor Act Review Committee
PO Box 6119
EAST PERTH WA 6892

Dear Review Committee,

Perth Racing takes seriously its responsibility to the community when organising all our events. Our commitment to joint planning with all key stakeholders has enabled us to build strong relationships via open communication and cooperation in the pursuit of common goals.

For our major events we conduct pre and post event meetings, where all stakeholders are invited to attend. This provides us with the opportunity to garner feedback and rectify any issues prior to the following event.

We believe that the following points need to be considered when reviewing the Liquor Control Act 1988, allowing for a smoother, streamlined and faster process for all concerned:

1. **Licence Application Approvals** – The application process can be a lengthy process which needs to be refined to allow event holders sufficient time to brief their staff of the conditions of the Licence and allow any concerns to be discussed well before the event.
2. **When reviewing whether to grant a Licence application**, the past performance or record of the event holder should be considered when conditions are being set. Each event is unique and it is very difficult to make comparisons. We have worked closely with all key stakeholders, including RGL and Police to make our events safer and more enjoyable for all concerned. We believe it unfair on all event holders to group events as one. I.e. racing events generally run over 7 hours compared to a music event that may run over 10 hours. WA should look at the NSW system which categorises venues based on past performance. If particular licensees fall into certain categories they have specific conditions put on their licence until they can prove they have overcome any particular issues with regard to their venue/s.
3. **Clear Guidelines** – The Act comprises over 300 pages and in many instances can be interpreted differently by various licensees, Police, LEU and RGL which can cause confusion and angst among all concerned. Having clear guidelines would alleviate the uncertainty that can arise when certain conditions are placed on licensees. For many Licensees it can become an expensive exercise to have lawyers confirm whether they are fully understanding and compliant of the Act. A glossary of terms on the RGL website would assist with many issues that arise.
4. **Lack of Flexibility with Licences** – An immediate example of this is restrictions with regards to staff carrying patrons drinks over a path to an adjoining licenced area. We may understand the requirement, but the average member of the public does not. There should be an element of flexibility with the sale, supply and consumption of liquor, without variation approvals being sought. Common sense should prevail.
5. **Public Education** – A public education campaign needs to be launched, educating the public of their responsibilities and that of the Licensee, as often the Licensee/Approved Manager is held

responsible for 100% of issues that relate to the sale, supply and consumption of Liquor. A majority of people believe it is their right to drink as much as they like without personal consequence and have little or no knowledge of Licensee responsibilities and the laws they need to abide by.

6. Retail Liquor Outlets – Heavy restrictions are placed on a majority of events, which are held in controlled environments, however it seems alcohol is readily available at Retail Liquor Outlets at greatly reduced prices. We believe this only encourages people attending these events to pre-load before they arrive and often turn up to the event much later than they would if this was not practiced.
7. Responsible Service of Alcohol Training – On occasions there can be uncertainty on whether certain training certificates meet the National training certification. All valid training organisations should be clearly listed on the Racing, Gaming and Liquor website and monitored and updated regularly.
8. Security Ratio – All ratios should be reviewed to allow Licensees the ability to redirect this expense to other areas to help manage crowd numbers. Considerable expense goes into employing additional Approved Managers, Responsible service of alcohol spotters and RSA patrol staff who have not been included in the security ratio because they are not considered security, although their responsibilities are similar, if not greater, than a crowd controller. Perth Racing does not see this as a cost cutting exercise as we have already gone to considerable expense employing additional Approved Managers, RSA spotters and RSA patrols for all our major events and these staff have never been included in the security ratio.
9. Electronic paperwork (RSA, Incident reports, etc.) instead of hard copies to make it easier to store and maintain the required information.
10. Service Restrictions – Onerous restrictions on what you can actually serve at some events can cause angst with patrons due to longer queues and poor service levels. With the amount of supervision and training of bar staff and security that is required, these restrictions should be reviewed for recurring events.

As previously stated Perth Racing has always exceeded their Liquor Act and Licence requirements and has worked diligently with all key stakeholders over many years to ensure each event is safer and more controlled than the last.

We understand the Department of Racing, Gaming and Liquor is responsible for regulating and maintaining the integrity of lawful racing, gambling and liquor activities for Western Australians to participate in and enjoy responsibly. We believe this is achievable if all parties can work together for the common goal.

If you would like to discuss this further I can be contacted on my mobile



Kind Regards

Clause 3(1)

Clause 3(1)

