

Legislation Scrutiny Committee
Committee Secretariat
GPO Box 3721
Darwin NT 0801

By email: LSC@nt.gov.au

Liquor Legislation Amendment (Fast-Track Approvals) Bill 2026

Dear Chair,

Retail Drinks Australia (**Retail Drinks**) welcomes the opportunity to provide a submission on the *Liquor Legislation Amendment (Fast-Track Approvals) Bill 2026* (the Bill).

By way of background, [Retail Drinks](http://RetailDrinks.com.au) is the national industry body representing the needs and interests of Australia's \$18 billion packaged (retail) liquor sector, with a vision to enhance the freedom to retail responsibly. Our membership represents the majority of all packaged (retail) liquor licences in Australia, and members comprise some of the most recognised and trusted companies and brands in the industry, including:

- *Independent Retailers*, whether operating under a known retail banner/brand, or their own.
- *Chain Retailers*, including Coles Liquor and Endeavour Group.
- Small and large *Online Retailers* and retail marketplaces.
- *Retail Banner Groups*, including Independent Brands Australia (Cellarbrations, The Bottle-O, IGA Liquor, Porter's Liquor, etc), Independent Liquor Group (Bottler, Fleet Street, and Super Cellars), Independent Liquor Retailers (Local Liquor, Countrywide Liquor, Liquor & Co), Liquor Legends (Liquor Legends and Urban Cellars), Liquor Marketing Group (Bottlemart, Sip n Save, and Harry Brown), and Liquor Stax; and
- Small and large beverage producers, suppliers and service providers to the retail liquor industry.

As the national industry body representing the interests of packaged liquor retailers, including those licensed businesses in the Northern Territory (**NT**) operating with a (1) *Grocery Store*; or (2) *Takeaway Store* authority, Retail Drinks is strongly committed to working constructively with government to ensure that regulatory frameworks are evidence-based, proportionate, and support both harm minimisation and legitimate business activity.

Retail Drinks welcomes the intent and direction of the Bill. The introduction of a more risk-based and streamlined licensing pathway represents a sensible and modern reform that aligns with best-practice regulatory design.

SUPPORT FOR A RISK-BASED, STREAMLINED FRAMEWORK

The insertion of provisions like section 52A, establishing a framework for **low-risk applications**, and enabling their determination on a **simplified basis**, is a positive step toward reducing unnecessary administrative burden.

The ability under section 49(5) for the Commission to determine low-risk applications without requiring full satisfaction of public interest (49)(1)(b) and community impact considerations (49)(1)(c) is welcome. For existing, compliant operators seeking modest or administrative changes, the current requirements are disproportionate. Removing the need to prepare extensive community impact material or undertake formal consultation processes in these circumstances will significantly improve efficiency while maintaining appropriate safeguards.

Similarly, the amendment to section 57 (2), to exempt low risk applications from public notice requirements is supported. Public notification and objection processes can introduce delay, cost and uncertainty, and are not always necessary for matters that are genuinely low risk in nature.

Retail Drinks also supports the addition of section 10(1)(fa), which provides for material alteration approvals from the Director. This is a practical administrative change that should allow for more timely decision-making and support ongoing investment and improvement within the retail sector.

Taken together, these reforms deliver a more efficient and proportionate licensing system, while retaining core safeguards such as the requirement that applicants be assessed as a fit and proper person.

MATTERS FOR CONSIDERATION

While Retail Drinks supports the Bill, there are several areas where further consideration or clarification would strengthen the framework.

1. Reliance on Regulations to define “low risk”

The effectiveness of the new framework is heavily dependent on how “**low-risk**” and “**very low-risk**” **authorities are defined in regulations**, as referenced in section 52A(1). Retail Drinks notes that the primary legislation does not prescribe these categories, meaning the practical scope of the reform will be determined through subordinate legislation. It will be critical that the Regulations appropriately capture common, lower-risk packaged liquor activities, to ensure the reform delivers its intended benefits to industry and does not operate too narrowly.

2. Director’s discretion to remove applications from fast-track

Retail Drinks notes the power under section 52A(2)–(4) for the Director to determine that an application should not be treated as a low-risk application. While the existence of safeguards is appropriate, the breadth of the discretion of 52A(2), particularly when based on a general “public interest” consideration, creates uncertainty for applicants.

3. Review rights

Of particular concern is that a determination by the Director under 52A(5) is **not reviewable by the Commission or the NT Civil & Administrative Tribunal (NCTCAT)**. While this would ensure it is easier for applications to be determined by the Director under the existing higher risk application thresholds, it runs the risk of reducing principles of procedural fairness. Importantly it means the determination by the Director under 52A(2) is beyond scrutiny. Retail Drinks encourages consideration of appropriate review pathways or, at minimum, clearer guidance on the exercise of this discretion.

ACKNOWLEDGING PROGRESS ON HARM MINIMISATION AND COMMUNITY SAFETY

Retail Drinks acknowledges the NT Government’s continued efforts to address alcohol-related harm and improve community safety outcomes. We support targeted, evidence-based measures, rather than broad, population-wide restrictions and strongly supported the Government’s removal of the Minimum Floor Price. In this context, the Bill’s shift toward a more risk-differentiated and targeted framework is both appropriate and welcome.

Further, we strongly support the Government's enhanced crime and justice law reforms which have led to material reductions in crime incidents across the NT, as evidenced in the latest NT crime statistics. We also acknowledge the Government's swift response last year in amending bail laws following the tragic death of Nightcliff liquor retailer.

We further support the continuation of the Bizsecure grants to assist stores in target hardening against crime, however we are concerned that the Business Security & Safety Audit Program has been closed. The latter should be explicitly listed as "non-standard work" for the purposes of a grant, noting it is vital in determining the most effective eligible standard work required in each situation.

FUTURE REFORM OPPORTUNITIES

Retail Drinks welcomes this Bill as a positive first step in modernising the NT's liquor regulatory framework. We believe this reform should form part of a broader program of targeted, evidence-based reform, consistent with the policy priorities previously provided to Government. As outlined in previous correspondence and engagement, we believe the following priority areas will support a more balanced, effective and sustainable regulatory environment:

- **Reform of Clause 53 of the Liquor Regulations 2019**, including increasing the cap on alcohol sales for grocery stores and addressing reporting burdens, to better reflect commercial realities and reduce unnecessary compliance costs.
- **Removal of the moratorium on new takeaway licences**, to ensure applications are assessed on their merits rather than restricted by blanket policy settings, particularly in growing or underserved areas.
- **Ongoing support for enforcement measures such as Police Public Safety Officers (PPSOs) at bottle shops and grocery stores**, which have demonstrated effectiveness in deterring anti-social behaviour and improving safety outcomes at high-risk locations. It is important that the former important work of the Police Auxiliary Licencing Inspectors (PALIs), is not reduced through their integration into the PPSO unit.
- **Review of trading restrictions**, including Sunday trading limitations, to ensure consistency, fairness and competition across licence categories.
- **Stronger protections for retail workers**, including enhanced penalties for assaults and continued support for security initiatives such as business grants and industry-led safety programs.
- **Consideration of nationally consistent frameworks**, including adoption of Retail Drinks' [Online Alcohol Sale and Delivery Code of Conduct](#), to ensure future regulatory settings are aligned with best practice.

In addition, Retail Drinks reiterates the importance of maintaining appropriate review and consultation mechanisms within the liquor licensing framework. As outlined in our previous correspondence, this includes preserving the role of the NTCAT as an accessible and practical review pathway for licensing decisions, ensuring consultation with licensees, industry and the community when licence conditions are varied, and maintaining a balanced compliance framework that both deters misconduct and recognises good compliance.

We consider these reforms, alongside the current Bill, would collectively deliver a more balanced, effective and evidence-based regulatory system for the NT, and welcome the opportunity to continue engaging with the Department as policy development progresses. Please do not hesitate to contact me via email at info@retaildrinks.org.au or 02 8335 3200 to discuss the matter further.

Sincerely,

Michael Waters
Chief Executive Officer