

To the Chair and members of the Legislative Scrutiny Committee

As a person interested in the work of the Legislative Assembly, I would have liked to make a submission to the Legislative Scrutiny Committee (LSC) inquiries into these three Bills currently before the Assembly:

1. Liquor Legislation Amendment (Fast Track Approvals) Bill 2026 (Serial 62)
2. Racing and Wagering Amendment Bill 2026 (Serial 59)
3. Firearms Amendment Bill 2026 (Serial 61).

However, the process adopted by your committee prevents me and, no doubt, many other individuals and organisations from making fully informed and well-researched submissions to assist you in your deliberations due to timeframe issues, and the quality and accessibility of information about each Bill.

Timeframe issues

While it is encouraging that these Bills have been referred to the LSC, the timeframes established by the referring Ministers Boothby and Finocchiaro for LSC inquiry and report – especially with the volume of Bills currently before the Assembly – do not allow the time necessary for organisations to understand the complexities of the proposed legislation, consult with their members, develop a position, draft a report, and gain approval before submission.

The current process allows 7 working days for the process of developing a submission.

Wednesday 18 March	Bill is introduced
Thursday 19 March	LSC calls for submissions
Friday 20 March	Timetable parameters (i.e. 9:00 am to 3:00 pm) for public briefings on seven Bills published on LSC website
Monday 23 March	Timeslots for specific Bills published
Tuesday 24 March	Public briefing held, noting that the timetable was not adhered to for the briefing on the Racing and Wagering Amendment Bill 2026
Friday 27 March	Submissions due, noting that a time is not specified so the presumption is 11:59 pm

Such a condensed timeframe of seven working days from calling for until closing submissions is unnecessary considering the important role of review and scrutiny the LSC undertakes for the NT's unicameral parliament. The other unicameral parliaments in Australia allow a much longer timeframe for this. In both the Australian Capital Territory and Queensland, all Bills are referred to committee scrutiny with the relevant committees having up to three months and up to six months respectively for inquiry and report, not less than six weeks.¹

My own process as an individual in order to prepare a submission requires me to:

- locate and download the available documents related to the Bill
 - the Bill
 - the legislation to be amended

¹ See ACT Legislative Assembly – Standing Order 174 and Parliament of Queensland Standing Order 136.

- the explanatory speech
- the Minister's first reading speech
- mark up the legislation to be amended with the changes proposed by the Bill
- read and analyse each document and compare information across documents
- check my understanding of the proposed amendments and their implications by:
 - undertaking background research into the history of the legislation
 - understanding the relevant frameworks, strategies, policies etc.
 - taking notes and formulating questions
 - accessing the public briefing via the Assembly's website in the hope that my questions will be answered
- identifying issues and commencing to draft text for a submission in line with the LSC's terms of reference
- working on a submission
- finalising a submission, checking references, etc.

These activities take time and effort and must be completed in the very tight timeframe specified. How does the LSC expect individuals - who may have full-time employment, family responsibilities, and so on - to be able to effectively participate in this process?

Quality of information

The explanatory information accompanying each Bill introduced in the NT Legislative Assembly is at times inadequate.

There appears to be no consistency or quality standards applicable to the information provided to outline the Bill in the Explanatory Statement. For example, the explanatory statement for the Firearms Amendment Bill 2026 states that 'This Bill amends the *Firearms Act 1997*.' That is blatantly obvious from the title of the Bill.

What would be more useful in understanding the Bill is information which addresses:

- the general purpose of the Bill
- the policy objectives the Bill addresses and what alternatives were considered
- the estimated costs (and benefits) associated with implementation of the Bill
- consultation which was undertaken
- notes on each clause which do not merely provide a plain language version of the legislation but actually explain what the Bill is trying to achieve.

Errors in the explanatory statement are unacceptable and indicate a sloppy and rushed process. A final proofreading should have identified the incorrect clause numbers from clause 15 onwards in the explanatory statement tabled with the Firearms Amendment Bill 2026. This explanatory statement also fails to note the substantial increase in the penalty provision in clause 11 in regard to amended section 68.

Is the LSC in the position of requiring Ministers to submit more enlightening and accurate information about each Bill and/or rejecting information that does not reach certain quality standards?

Accessibility of information

Public briefings provide the public, as well as the LSC, with an important avenue of information to assist in understanding each Bill. To publish a timetable for the briefing then not adhere to it merely for the convenience of the people in the Litchfield Room is frankly appalling. I am referring here to the briefing on the Racing and Wagering Amendment Bill 2026 which was clearly well progressed by its published starting time of 12:15 pm.

While the briefing is webcast, a copy of the webcast is not available for people who are not able to attend the briefing in person due to geography or other commitments, or who want to check information that was provided by watching for a second time. This is also important for people who may be watching from their workplace but need to attend to more pressing matters. Is the LSC aware of how many people access each public briefing if they are unable to attend in person?

At the start of each briefing, the Chair announces that a transcript will be made for the use of the Committee and may be made public. However, publication of the transcript – even in draft form – does not occur until well after the closing date for submissions unlike publication of the transcript of Assembly proceedings which is available the following day.

If these timetabling, quality and accessibility issues are addressed, the LSC may receive more and better quality submissions to inform their deliberations. As an example, I have attached a contribution outlining my concerns about the amendment to section 137(1)(b) of the Liquor Act 2029 proposed by clause 16 of the Liquor Legislation Amendment (Fast Track Approvals) Bill 2026.

Unfortunately, I do not have time to draft a submission addressing other issues I have identified with this Bill and with the Racing and Wagering Amendment Bill 2026 and the Firearms Amendment Bill 2026.

I give permission for this submission to be published under my name by the LSC on the relevant inquiry website/s.

Regards

Elizabeth Creed

Responsible Service of Alcohol certificates (clause 16)

The National Training Register provides details for the unit of competency commonly referred to as the Responsible Service of Alcohol (RSA) certificate (i.e. SITHFAB021 Provide responsible service of alcohol) which ensures that a person has the skills and knowledge required to responsibly sell, serve or supply alcohol.

SITHFAB021 Provide responsible service of alcohol

This unit applies to all levels of personnel involved in the sale, service (including promotional service) and supply of alcohol in licensed premises. Those selling or serving alcohol may include: food and beverage attendants; packaged liquor salespersons selling in person, over the phone or online; winery, brewery and distillery cellar door staff; delivery services and supplier sales representatives. The unit also applies to security staff who monitor customer behaviour and to the licensee who is ultimately responsible for RSA management.

This unit covers the RSA skill and knowledge requirements common to all States and Territories. Some legislative requirements and knowledge will differ across borders. In some cases, after completion of this unit, state and territory liquor authorities require candidates to complete a bridging course to address these specific differences. Those developing training to support this unit must consult the relevant state or territory liquor licensing authority to determine any accreditation arrangements for courses, trainers and assessors.

Source: Compiled from <https://training.gov.au/training/details/SITHFAB021/unitdetails>

The *Liquor Act 2019* requires that a licensee must ensure that every employee whose responsibilities include serving or supervising the service of alcohol to patrons holds an accredited and approved Responsible Service of Alcohol (RSA) certificate and completes a refresher course every 3 years. This is based on Recommendation 2.8.3 of the Riley Review².

Clause 16 proposes an amendment to section 137(1)(b) to extend the period for requiring a refresher course to be undertaken from 3 years to 5 years. This is based on an Approvals Fast Track Taskforce recommendation which is intended to 'reduce unnecessary touchpoints with government by extending licence renewal periods'.³ According to information provided during the public briefing, this aligns with the requirements in New South Wales (NSW).

Recommendation 5C. Extend renewal periods for responsible service certificates from 3 to 5 years.

The current renewal period for Responsible service certificates creates unnecessary administrative burden on licenced businesses in managing their employees. Amending section 137(1)(b) of the *Liquor Act 2019* to extend the renewal period from 3 to 5 years will reduce the renewal cycle and administrative burden for employees and businesses.

Source: <https://cmc.nt.gov.au/media/docs/advancing-industry/saying-yes-to-business-supplementary-report.pdf>

² *Alcohol Policies and Legislation Review: Final Report*. Prepared for the NT Government, October 2017. <https://dth.nt.gov.au/media/docs/publications/racing-gaming-and-licensing/alcohol-reform/alcohol-policies-and-legislation-review-final-report.pdf>

³ Approvals Fast Track Taskforce (2025) *Saying 'Yes' to Business – Supplementary report*. May 2025. <https://cmc.nt.gov.au/media/docs/advancing-industry/saying-yes-to-business-supplementary-report.pdf>

There are three main issues with the clause 16 amendments. Firstly, undertaking a refresher course is fundamentally different from the administrative task of simply renewing a licence for a further period. Secondly, while the proposed timeframe of 5 years does align with the NSW timeframe, the NSW requirements for certification are quite different from that in the NT. Thirdly, the narrow focus of the amendment on administrative burden ignores the wider context of the environment in which an RSA holder works.

According to Online RSA, a registered training provider delivering RSA courses, the refresher course is needed every 3 years because:

Each year, the state and territory governments will make a number of changes to the RSA legislation that needs to be incorporated into the course. These things usually consist of new state/territory laws and regulations, temporary measures and almost always changes to fines. Less often a whole new RSA unit of competency is released, which affects what and how we need to train you. The RSA renewal schedule is set to ensure everyone working with alcohol is given these critical updates in a timely fashion.⁴

For example, in Victoria, the RSA Refresher can be done as a 30-minute online course but there is also a requirement for a 60-minute online module (Sexual Harassment and Assault: Recognise, Prevent and Respond) which includes pre- and post-training surveys.⁵

Secondly, the proposed timeframe of 5 years does align with the NSW timeframe but the NSW requirements for certification are fundamentally different. While a statement of attainment for the SITHFAB021 RSA course delivered online is acceptable in the NT, attainment of the competency card which is essential for a person working in the liquor and/or gaming industry in NSW requires a practical demonstration of skills assessment via video from a suitable physical simulated environment, as well as a photo identification card.⁶

Thirdly, the outcome of extending the period for refresher training from 3 years to 5 years is likely to be inadequately trained staff without the current knowledge to enable them to undertake their work safely and professionally while dealing with a wide range of people in what can often be a volatile environment, especially in locations which have been classified as high risk and very high risk.

For these reasons and in reference to item 3(b)(ii) of the LSC terms of reference, I consider that the Assembly should amend the Bill by removing clause 16 from the Bill.

⁴ <https://onlinersa.com.au/>

⁵ <https://learninghub.liquor.vic.gov.au/>

⁶ <https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/training/competency-cards>