



The Hon. Chris Picton MP
Minister for Health and Wellbeing
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24/06/2025

Dear Minister Picton,

LIQUOR LICENSING (MISCELLANEOUS) AMENDMENT BILL 2025

We write as a coalition of the undersigned organisations involved in research and education regarding the use and harms of alcohol and other drugs, as well as the factors that impact on domestic, family and sexual violence. With regard to your portfolio responsibility as the Minister for Health and Wellbeing, our focus here is on the important impacts the Liquor Licensing (Miscellaneous) Amendment Bill 2025 may have on the health and wellbeing of South Australians and the demands placed on our health services due to the compounding impacts of alcohol use on individuals and on domestic, family and sexual violence. For your information, our coalition has also written to and met with Minister Michaels who has carriage of this legislation.

Our health system and health workers are frequently at the forefront of responding to the significant harms caused by alcohol consumption, including injuries from road accidents as well as incidents of domestic, family and sexual violence. It is distressing for all parties involved, as well as being a significant burden on health system resourcing. In South Australia, data indicates a significant association between alcohol consumption and both domestic violence incidents and hospitalisations related to assault. Alcohol is involved in up to 65 per cent of all police-reported family violence incidents,¹ and 52 per cent of male homicide offenders who killed their female intimate partner used alcohol at high-risk levels at the time of the homicide.² A comprehensive approach to responding to domestic, family and sexual violence in South Australia must include methods to address and reduce alcohol-related harm in the community.

As indicated in our respective submissions to the Review of the South Australian Government's Liquor Licensing (Miscellaneous) Amendment Bill 2025, as released in December 2024, we commend the Bill and reiterate the importance of all the measures aimed at harm minimisation and improving safety for women and children being implemented in full. We are also encouraged by the inclusions in the *South Australian Alcohol and Other Drug Strategy 2025-2030*, endorsed by you and The Hon Stephen Mullighan, which emphasise the Government's 'resolve to protect the safety of women and children' and the importance of addressing 'the role alcohol plays in exacerbating and escalating domestic, family and sexual violence'.

The draft Bill (as at December 2024) represents a decisive response to the recommendations arising from the *Rapid Review of Prevention Approaches* and the discussions led by the Prime Minister and the National Cabinet. These resulted in all states and territories committing to review their respective liquor licensing legislation with the express purpose of reducing the impacts of alcohol use on levels of domestic, family and sexual violence.

The adoption and implementation of the provisions in the draft Bill will not only be instrumental in achieving the long-overdue objective of preventing and reducing domestic, family and sexual violence, it will also set an important precedent and act as a pathfinder for other jurisdictions to amend their respective liquor laws. With this draft Bill being the first of its kind in the country, it is critical to ensure that updates to our existing liquor laws demonstrate a strong, unambiguous and unwavering commitment to protecting women and children. Doing so will also enable our Premier to report our positive progress to the National Cabinet.

We understand that there are currently proposals under discussion that could result in winding back core provisions in the Bill. We have therefore set out the key provisions of the Bill that we believe must be retained if our State is to reduce the impacts of alcohol use on gender-based violence, as well as individuals and our broader community, in addition to reducing the demands placed on South Australia's health system.

Harm minimisation must be the paramount object of the Liquor Licensing Act 1997

It is essential that the paramount object in the proposed amendment to Section 3 of the Bill is retained, namely, 'to ensure that the sale and supply of liquor occurs in a manner that minimises the harm and potential for harm caused by the excessive or inappropriate consumption of liquor'.

We are concerned that the specific and distinguishable features of an object in legislation that is defined as 'paramount' (and therefore categorically superior to all other objects) would be downgraded significantly if replaced by the word 'primary'. Doing so would, in all likelihood, also result in contestation regarding the primacy of a range of competing objects in the legislation.

Any undermining of the paramountcy of harm minimisation would allow the availability of alcohol to expand in unprecedented and uncontrolled ways, thereby eroding the protections that would be provided for in this Bill. The evidence is clear regarding the links between increased alcohol availability and higher rates of domestic violence³ and sexual violence⁴, as well as child maltreatment.⁵

The two-hour safety pause must not be reduced

The amendment of section 32(d)(i) as proposed in the Bill (at December 2024) stated that 'at least 2 hours passes between the time the order is placed for the liquor and the time it is delivered'. However, we understand that this provision for a two-hour safety pause may be reduced. A time frame that is less than two hours would not be sufficient to provide a 'circuit-breaker' for people to sober up and reconsider the impulsive purchasing of alcohol. Research data indicates that people use rapid delivery to prolong risky drinking sessions,⁶ and 77 per cent of weekly service users of rapid delivery say that they would have stopped drinking if rapid delivery were unavailable.⁷

The 10am to 10pm delivery window timeframe should not be extended

The draft Bill currently amends Section 32(d)(ii) by deleting the provision 'that, if the liquor is to be delivered to an address in this State, the liquor is delivered only between the hours of 8 am and 10 pm' and substituting it with 'that, in the case of a retail transaction, if the liquor is to be delivered to an address in this State, the liquor is delivered only between the hours of 10 am and 10 pm'.

The retention of the 10am to 10pm time limit is critical in reducing the risk of violence in the home. Combined with the provision for a 2-hour safety pause, this would mean that no liquor orders could be placed after 8pm. Alcohol-related domestic violence assaults increase substantially between 6pm and midnight (as well as from midnight to 6am on Saturdays and Sundays).⁸ In 2016, the extension of home-delivered and takeaway alcohol from 10pm to 11pm by the NSW Government was associated with an estimated 1,120 additional domestic violence assaults in the 38 months after trading hours were extended.⁹ It is clear that increasing the delivery window timeframe would result in negative impacts and that reducing the timeframe in the morning and/or the evening would result in positive outcomes.

As key sector organisations working in the field of harm minimisation relating to alcohol and other drugs, as well as the impacts of factors associated with domestic, family and sexual violence alongside violence more broadly, we urge you to retain the commendable provisions as set out in the version of the Bill released in December 2024. If any changes to the above measures are made in the final version of the Bill, we respectfully request that the South Australian Government provides an opportunity for our organisations to provide input.

Please do not hesitate to contact us for further information. We would welcome an opportunity to meet with you to discuss this important issue, given that health services are directly impacted and play a critical role in the Government's response to the minimisation of harms caused by alcohol consumption and the associated impacts on domestic, family and sexual violence. Should you be interested and available to meet, please could your office contact Gabrielle Kuta on gabrielle.kuta@fare.org.au or call 02 5104 9311.

Sincerely,



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1 Foundation for Alcohol Research and Education. (2015). *National framework for action to prevent alcohol-related family violence*. Canberra: Foundation for Alcohol Research and Education.

2 Australian Domestic and Family Violence Death Review Network, & Australia's National Research Organisation for Women's Safety. (2022). *Australian Domestic and Family Violence Death Review Network Data Report: Intimate partner violence homicides 2010–2018* (2nd ed.; Research report 03/2022). ANROWS.

3 Wang, J., Fung, T. & Poynton, S. (2022). Takeaway alcohol sales and violent crime: the implications of extended trading hours. NSW Bureau of Crime Statistics and Research. *Crime and Justice Bulletin No. CJB247. Takeaway alcohol sales and violent crime: the implications of extended trading hours* | BOCSAR Accessed 5 May 2025.

4 Lippy, C. & DeGue S. (2016). Exploring alcohol policy approaches to prevent sexual violence perpetration. *Trauma, Violence & Abuse*, 17(1):26–42. doi: 10.1177/1524838014557291. Epub 2014 Nov 16. PMID: 25403447; PMCID: PMC5871229.

5 World Health Organization. (2024). *Child maltreatment*. [Child maltreatment \(who.int\)](https://www.who.int/) Accessed 5 May 2025.

6 Mojica-Perez, Y., Collinan, S. & Livingston, M. (2019). *Alcohol home delivery services: An investigation of use and risk*. The Centre for Alcohol Policy Research and the Foundation for Alcohol Research and Education. [Alcohol-home-delivery-services.pdf](#) Accessed 7 May 2025.

7 VicHealth (2020). *On-demand alcohol delivery services and risky drinking*. <https://www.vichealth.vic.gov.au/media-and-resources/publications/alcohol-delivery-risky-drinking>

8 NSW Bureau of Crime Statistics and Research. (2025). *Alcohol-related violence*. [Alcohol-related violence | BOCSAR homepage](#) Accessed 23 May 2025.

9 Wang, J., Fung, T. & Poynton, S. (2022). Takeaway alcohol sales and violent crime: the implications of extended trading hours. NSW Bureau of Crime Statistics and Research. *Crime and Justice Bulletin No. CJB247. Takeaway alcohol sales and violent crime: the implications of extended trading hours* | BOCSAR Accessed 5 May 2025.