

09/08/07
1 Woolworths Way
Bella Vista NSW 2153

**Ms Jackie Morris
Committee Secretary
Senate Legal and Constitutional Committee**

**Sub: Submission to the Senate Legal and Constitutional Affairs
Committee Inquiry into the Appropriation (Northern Territory National
Emergency Response) Bill (No. 2) 2007-2008**

Dear Ms Morris,

We respectfully request that our brief submission to the inquiry be considered.

Our company operates 10 liquor licenses in the Northern Territory.

While we are supportive of any measures that can be introduced to address alcohol related harm in the Northern Territory we can see some practical and operational difficulties with one key part of the legislation.

Subclause 20 of the proposed legislation provides that if there is any sale of a quantity of take-away alcohol exceeding 1,350 millilitres of pure alcohol content, photo ID must be produced and the name and address of the purchaser as well as the address where the alcohol is to be consumed must be recorded. This is stated as equating to just over 3 cases of full-strength beer, but this holds true only in the case of 24x375ml cartons. This calculation becomes extremely complex when mixed sales of beer, wine and spirits take place.

The alcohol content of beer varies between 2% alcohol by volume and 7% alcohol by volume (some beers are lower and higher but this range would catch 99% of transactions). Liquid volume in a full case of beer varies from just under 4 litres (24x250ml) to 11.25 litres (30x375ml) consequently the pure alcohol content of a case of beer varies between 120ml to 540ml. This ignores other possible permutations caused by different alcohol volumes and pack sizes.

The alcohol content of a bottle of wine varies between 5% and 20%, although most bottles are 750ml our stores stock sizes varying between 187ml and 2000ml. In any given 750ml bottle of wine, pure alcohol content can vary between 37.5ml and 150ml. In addition to this the alcohol content of the same brand and variety of wine can vary from vintage to vintage. This ignores other possible permutations caused by different alcohol volumes and pack sizes.

In the case of spirits, alcohol content can vary between 20% and 57% for commonly stocked brands. Common bottle sizes range from 50ml to 1125ml, although a number would fall outside this range. The pure alcohol content of a standard 700ml bottle of spirit could vary between 140ml to 400ml. This ignores other possible permutations caused by different alcohol volumes and pack sizes.

A typical supermarket liquor store would stock approximately 1,300 different products. We understand that there is a proposal to produce some kind of "ready reckoner" to calculate the potential alcohol content in any transaction. The number of possible combinations of products in any given transaction makes it difficult to contemplate how this could be achieved.

We understand that a failure to correctly record these transactions makes a company liable to a fine of \$37,000 and the individual employee liable to a fine of \$6,600 per offence.

We are obviously ready to work within the legal frame-work provided but require some guidance as to how we might practically comply with the proposed legislation.

Yours Sincerely,

Shane Tremble
Woolworths Liquor Group
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