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30 June 2017

Mr Trevor Riley  
Chair  
Expert Advisory Panel  
Alcohol Policies and Legislation Review  
C/o Department of Health  
PO Box 40596  
CASUARINA NT 0811

By email: [alcohol.review@nt.gov.au](mailto:alcohol.review@nt.gov.au)

Dear Mr Riley and Panel Members

It is known that Darwin International Airport (DIA) is to be the location of the proposed Dan Murphy liquor outlet and I wish to declare that vested interest up front.

I would like to make the Panel aware of the DIA approach to this potential development on the Airport site. The Airport is a significant economic and social infrastructure asset for the Top End and has a high profile in the Darwin community. Some 1,800 people are employed on the Airport site and DIA is surrounded on all sides by residential, industrial, commercial, rural and Defence development. This makes DIA think carefully about any development it progresses with proponents, particularly developments which front externally.

The site chosen for the proposed Dan Murphy big box liquor outlet is on Bagot Road immediately to the south of the big box hardware Bunnings store. Apart from Bunnings, the nearest development is commercial/light industrial immediately to the north-west and a service station/McDonalds around 620m to the south. The proposed site is inhospitable to foot access.

The Northern Territory Government has now legislated the 400sqm limit in line with its election platform and to stop the proposed Dan Murphy development. It has maintained that this is an evidenced based policy. Venturing into the world of research into effective supply (i.e. regulatory) measures to mitigate alcohol related harm appears to us to be a fraught business, particularly when attempting to differentiate between on-licence and off-licence premises.

A common theme in the literature is that, other things being equal, reducing the density of alcohol outlets has positive correlation with reducing alcohol related harm (while actual causality factors still needs more research). Outlet size does not seem to feature in the literature to any extent.

Based on the above a simplistic supply (regulatory) approach to takeaway alcohol outlet density would be a policy which encouraged less outlets while still enabling easy access to the full range of products for responsible drinkers.

Larger off-licence operators such as Dan Murphy with a big box retail format and targeted at higher end products would seem to tick a number of boxes in any comprehensive supply based Government program to both reduce outlet density and require high management standards of remaining outlets. Several of those ticked boxes would be:

- easy accessibility to off-licence outlets would be reduced;
- a big box retail operation cannot be located where most of the existing smaller shop based outlets are located, including in residential areas and the CBD. They need to be larger commercial or light industrial areas which makes accessibility harder, particularly for foot traffic;
- big box retail does not generally cater for drive through purchases (private vehicle or taxi);
- responsible drinkers are compensated for reduced accessibility with a larger range of products; and
- staff at these large outlets will be well trained within a strict responsible serving policy which is enforced.

I realise the above has only skimmed the surface of a complex area. However, there does not appear to be any evidence that the large size of an off-licence outlet is a contributing factor to alcohol associated harm. In fact it could be a component in a comprehensive program of reducing outlet density in areas which currently feature as alcohol harm 'hot spots' and still keeping responsible drinkers on-side.

I look forward to an opportunity to address the Panel.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Kew', followed by a period.

**IAN KEW**  
Chief Executive Officer