



19th January 2010

Our ref: RJC:JL/09-207

The General Manager
Blue Mountains City Council
Locked Bag 1005
KATOOMBA NSW 2780

Attention: Ms Sarah Hunter, Senior Town Planner

Dear Sarah,

re: Development Application No. 1079 of 2009
Property: 159 Macquarie Road, SPRINGWOOD NSW 2777
Proposed development: Shop fitout and use as a BWS Liquor Store and associated signage

We are instructed by Gwynne Thompson Solicitors on behalf of Lower Blue Mountains Liquor Supplies Pty Ltd (which operates the Springwood Cellars at 119 Macquarie Road, Springwood) in relation to the above development application ("DA"). Council has invited submissions until 20th January 2010.

We respectfully submit that Statement of Environmental Effects which accompanies the DA has not accurately, sufficiently or properly addressed all relevant matters required to assist Council in its determination of the proposal's potential impacts under Section 79C of the Environmental Planning and Assessment Act 1979. Accordingly, there is no basis upon which Council can determine the DA.

On behalf of our client, we raise objection to the proposal on the following grounds:-

1. The documentation submitted in support of the DA is inadequate.

The DA is accompanied by a Statement of Environmental Effects ('SEE') prepared by James Lovell and Associates Pty Ltd (dated 23 November 2009). The SEE does not, in our opinion, sufficiently address the likely or potential impacts of the development, or the relevant heads of consideration listed under Section 79C of the Environmental Planning and Assessment Act, 1979 ('EP&A Act'). Section 79C(1) requires the consent authority to take into consideration:

"(a) the provision of:

- (i) any environmental planning instrument; and*
- (ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent*

authority (unless the Director-General has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and

- (iii) any development control plan; and*
- (iiia) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and*
- (iv) any matters prescribed by the regulations that apply to the land to which the development application relates.*

- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- (c) the suitability of the site for the development,*
- (d) any submissions made in accordance with this Act or the regulations,*
- (e) the public interest.”*

The SEE is limited solely to potential impacts on streetscape.

The SEE provides no assessment of:

- the social impacts of the proposal on the local community;
- the impact of the proposal on traffic levels and parking availability in the Springwood Village Town Centre; and
- the economic impact of the proposal.

No information, analysis or assessment has been provided about these matters. Without this information, Council is unable to properly assess the DA pursuant to Section 79C.

2. Misleading information in relation to the nature of the proposal.

The DA is inconsistent with information which has been otherwise provided to the community in relation to the proposal. The SEE states that the proposal involves trading hours and staffing levels as reported in the table overleaf. However, notification provided separately to surrounding land owners and the community (under the CIS provisions of the Liquor Act 2007) (dated 1st December 2009) contains different and inconsistent details about the proposal. For example, the SEE proposes that **the premises would trade for an additional sixteen hours each week compared to the hours indicated to the community** during the CIS notification process. This information has been enclosed as Attachment 1 and is summarised for comparison in the table overleaf.

	SEE submitted with the DA	Notification issued by BSV	Difference
Proposed Trading Hours			
Monday to Wednesday	8.00am to 10.00pm	9.00am to 8.00pm	3 hours
Thursday to Saturday	8.00am to 10.00pm	9.00am to 9.00pm	2 hours
Sunday	10.00am to 8.00pm	10.00am to 7.00pm	1 hour
Proposed Staffing			
Full time staff	2	3	1 staff
Part time/ Casual staff	0	5	5 staff
Total	2	8	6 staff

The BSV notification states that “An Application has been made to Blue Mountains City Council for consent for the Proposed Premises to operate in the manner described by this document.” This is clearly not the case. As such, properly informed comments cannot be made on the DA.

3. Social impacts are not addressed in the SEE.

The SEE is deficient as no information has been provided by the Applicant as to the social impact of the proposal on the local community.

There are potential negative impacts which arise from the proposed development which have not been addressed in the SEE. These include levels of assault, underage drinking, domestic violence, underage drinking and malicious damage. There are also vulnerable residents living near the proposed premises. The SEE has not identified or considered these issues.

The below observations are made on the potential or adverse social impacts associated with the proposal.

(a) Springwood is a disadvantaged community.

Springwood’s core¹ is a relatively disadvantaged community, surrounded by a more advantaged hinterland. The NDRI review² identifies that there is a general correlation between social disadvantage and heightened risk of alcohol-related problems.

This is confirmed by reference to the ABS SEIFA Disadvantage score for ABS Collectors District (CD) no. 1,231,101 in which the proposed premises is located. Its score of just 977 places it in the worst 37% of ABS CD's in NSW. Comparatively, the Blue Mountains LGA SEIFA Index of Disadvantage score is 1051, placing it in the best 15% of LGA's in NSW.

As a further measure of socio-economic disadvantage, confirming the presence of people potentially at risk of social harm from the proposal, Clause 18E of the (now repealed) Liquor Act 1982 regulation established a number of demographic indicators of heightened risk from alcohol related harm. Applications for the grant of a new liquor licence were previously

¹ That is, the urban area generally bounded by the Great Western Highway to the north, Short Street to the west, Burns Road to the east and National Park to the south. This correlates with ABS CD no. 1,231,101.

² National Drug Research Institute and Centre for Adolescent Health (2004) *The Prevention of Substance Use, Risk and Harm in Australia: A Review of the Evidence*

required to address these indicators in a Social Impact Assessment (SIA). The indicators provide a useful basis for assessment in this case.

Analysis of these indicators reveals notably higher proportions in CD 1231101 of residents at potential risk from the DA -

- the high unemployment rate (7.7% vs 4.9% for the LGA);
- the low incomes of residents who do work (48.4% earn less than \$400 per week, vs 40.1% in the LGA). A significant proportion of households are also low income (40.3% earn less than \$500 per week, vs 17.6% in the LGA). A majority of households (60%) earn less than \$800 a week (compared to just 33.8% in the LGA).
- their low educational attainment (42.4% are without a tertiary or trade qualification vs 37.8% for the LGA) and skills base (8.7% work as labourers vs 7.4% for the LGA);
- their transient nature (42.8% of households are in rental accommodation vs 19.8% for the LGA);
- the proportion of young adult males present (15.9% aged 18 to 30 years, vs 13.3% for the LGA). The Bureaus of Crime Statistics and Research (BOCSAR) data identifies that those involved in alcohol related crime are generally young; and
- the proportion from a non-English speaking background (NESB) (8.1% vs 6.3% for the LGA).

There is a definable risk of social harm to the residents of Springwood from the proposed liquor store. The demographic data above indicates that an increase in availability of alcohol in Springwood could give rise to adverse social impacts. These adverse impacts have not been addressed in the SEE.

(b) Springwood has identified problems related to alcohol.

Springwood already experiences serious matters of social harm which are attributable to alcohol. This includes assault, underage drinking, domestic violence, underage drinking malicious damage and antisocial behaviour.

This can be confirmed by -

- The NSW Bureau of Crime Statistics and Research (BOCSAR) crime report available for the LGA³ which clearly identifies Springwood as an alcohol-related crime hotspot.
- Commonwealth funding of a CCTV system for the Springwood Town Centre (in December 2008) in response to crime, antisocial behaviour and vandalism in the precinct, behaviour linked to alcohol.
- The declaration by Council of the majority of the village centre as an alcohol free zone⁴, made in response to a need to control the consumption of take away alcohol in the public domain.

³ [www.lawlink.nsw.gov.au/lawlink/bocsar/ll_bocsar.nsf/vwFiles/BlueMountains_07.pdf/\\$file/BlueMountains_07.pdf](http://www.lawlink.nsw.gov.au/lawlink/bocsar/ll_bocsar.nsf/vwFiles/BlueMountains_07.pdf/$file/BlueMountains_07.pdf)

- The identification of the need to reduce the incidence of alcohol related crime and high levels of domestic violence as key issues in the 2007 Blue Mountains Community Plan.
- Discussions with the services which respond to these problems. To inform our submission, we discussed the DA with the following stakeholders, where serious matters relating to alcohol related harm in Springwood were raised -

- Mountains Youth Services Team (MYST), which has offices in Springwood; and
- NSW Police, Blue Mountains Local Area Command.

Police confirm that a “significant proportion” of the LAC’s workload stems from the use and abuse of alcohol. Underage drinking is widespread in the Blue Mountains, as is a culture of binge drinking amongst young people. This is confirmed not just by anecdotal evidence from a wide range of stakeholders, but quantitatively by -

- the NSW Population Health Survey (NSW Health) identifies that an enormous proportion of Blue Mountains young males aged 16-24 years engage in risk drinking (66.1%, compared to 45.9% in NSW overall).
 - a 2009 study (Black, M 2009) which identified very high risk alcohol consumption amongst Blue Mountains young people. It also identified that alcohol dependence occurred within 65% of service providers encounters with young people over a 12 month period.
 - Springwood MYST, which sees approximately 70 young people (unique clients) each week through its various programs and services, estimates that alcohol either contributes to or exacerbates existing issues (e.g. depression) amongst approximately 35-40% of clients.
 - MYST clearly identified a link locally between underage drinking and malicious damage and relationship breakdowns.
- Underage drinking is attributed by local youth workers to a lack of alternative things for young people to do as well as the opportunity provided by a lack of parental supervision (with both parents working outside the mountains and therefore not arriving home from work until night-time, particularly so on a Friday).
 - The DA places a larger outlet close to an identified place where underage drinking occurs (Manners Park). It is reported that this park is regularly frequented by an alcohol affected group of 10-15 young people aged 15-18 years.
 - The demands placed by alcohol on social services locally. Services are already stretched at or past capacity. We have been informed that the Blue Mountains does not have a dedicated Youth Drug and Alcohol worker. The 2007 Blue Mountains Community Plan identifies that alcohol services are a key community need.

There is a definable risk of social harm to the residents of Springwood from the proposed liquor store.

⁴ Macquarie Road (between Hawkesbury Road and Ferguson Road), and the entirety of Blend Street/ Greenway Lane.

(c) The established link between outlet density and social harm.

Within Springwood, there are already 5 locations nearby where alcohol can be obtained -

- Oriental Hotel (150 metres from the proposal);
- Springwood Cellars (155 metres);
- Royal Hotel (160 metres);
- Springwood Sports Club (300 metres); and
- Springwood Country Club (1.4 kilometres).

The link between outlet density and social harm has been established. The National Drug Research Institute (NDRI) report identified that there is evidence to support controls on outlet density 'as at the local level (such as individual suburbs) the level of outlet density is highly predictive of levels of alcohol-related harm'.

The SEE provides no information on the ability and/or capacity of the social environment to accept an increased density of liquor licences.

In light of the above negative crime and health outcomes and the presence of a vulnerable at-risk community, Blue Mountains City Council will need to consider whether increasing the density of licensed premises in Springwood is appropriate.

Towards a More Sustainable Blue Mountains – A 25 Year Vision for the City describes the community endorsed vision for the City of Blue Mountains. The SEE does not address how the proposed development would support the achievement of the following elements of the vision -

- *In 2025 we live in vibrant, healthy communities.*
- *The health and well being of Blue Mountains people are improved*
- *Blue Mountains communities are safe, caring and inclusive*

4. Traffic and Parking impacts have not been considered.

The SEE identifies that the floor area of the proposed premises is around 276m² and has the potential to generate substantial traffic movements, the assessment of which is entirely absent from the SEE.

The SEE states that stock deliveries will occur from a loading dock accessed via the rear lane. No details of the frequency of deliveries are provided in the SEE. No confirmation is provided that the rear laneway or loading dock is capable of accommodating the larger vehicle sizes required to service a liquor store. These vehicles will be larger than those currently supplying the existing premises.

The SEE does not identify whether staff or patron parking will be provided, and if not, where they would park to access the store. No consideration has been given to the affect the store's

change of use will have on local parking availability, particularly on-street. A recent GHD report "Springwood Town Centre Revitalisation: Briefing Note Stage 1 Traffic and Transport Advice" identifies that parking provision in the town centre is approaching capacity during peak periods.

The absence of a traffic report is objectionable.

5. Further action.

The SEE is deficient and there is no properly informed basis on which Council can determine the DA as:

1. the documentation submitted in support of the DA is inadequate;
2. social impacts have not been considered; and
3. traffic and parking impacts have not been considered.

We request that Council refuse DA No. 1079 of 2009 on these grounds. The absence of consideration of these factors fundamentally flaws the application. The application is likely to generate a number of adverse impacts in a locality already measurably experiencing social harm.

If clarification is required of any of the issues raised in this submission, please do not hesitate to contact the undersigned.

We request that we be provided with a copy of any response or additional material put to Council by the applicant so that we may be provided with the opportunity to comment on such material. We request that any additional information requested by the Council be placed on public exhibition for further review.

We understand that the DA is to be reported to Council on 23 February 2010. Would you please advise us at the earliest possible opportunity if there is any change to this information, in order that our client can make appropriate arrangements to make further representations to the meeting, if required.

Thank you for the opportunity to make this submission.

Yours sincerely

BBC Consulting Planners



James Lette
Associate Director
Social Planning

Email james.lette@bbcplanners.com.au



ATTACHMENT 1

Notification under Liquor Act 2007



Additional Information

This document relates to an Application for the grant of a packaged liquor licence at 159 Macquarie Street, Springwood. This document provides additional information to stakeholders concerning the proposal and outlines the security, harm minimisation and responsible service of alcohol practices to be adopted at the proposed premises.

The Proposal

An Application is to be made to the Casino, Liquor & Gaming Control Authority (the "Authority") for the grant of a *packaged liquor licence* at 159 Macquarie Street, Springwood (the Proposed Premises). The Proposed Premises will be entirely at ground level and will be associated with other "strip" style shopping facilities fronting Macquarie Street, Springwood. No external works are required to the building apart from branding the building in a similar fashion to all other BWS – Beer Wine Spirits outlets (see photographs below of typical BWS – Beer Wine Spirits stores).

A location map identifying the site of the Proposed Premises is provided at Annexure "A". A layout plan of the Proposed Premises is provided on the following page.

Typical BWS – Beer Wine Spirits stores



The Licence will permit the sale of takeaway packaged liquor for consumption off the Proposed Premises on behalf of Woolworths Limited trading under the banner “BWS – Beer Wine Spirits”. No off off-street parking will be provided for customers. Delivery trucks will have access to the rear of the Proposed Premises for the purpose of unloading deliveries.

The Proposed Premises will be fitted out as a modern “BWS – Beer Wine Spirits” store carrying a comprehensive range of beers, wines and spirits. The Proposed Premises will have a floor area of approximately 276m² and will consist of a display area with high and low profile shelving and bulk displays, refrigerated cabinets with associated shelving and storage areas. The Proposed Premises has been designed to provide both convenient access to the liquor products and stock by customers, as well as providing the availability of quality service and supervision by staff to customers (see photos of similar *BWS – Beer Wine Spirits* outlets above).

The Proposed Premises will accept all major credit cards and there will be an EFTPOS facility and cheques accepted from approved customers. In accordance with the general operating policies of Woolworths Limited, the Company proposes to offer discount liquor as well as providing tastings of the liquor products from time to time by various company representatives. Woolworths Limited will also promote the liquor products through various forms of media such as radio, local and state wide newspaper advertisements.

An Application has been made to Blue Mountains City Council for consent for the Proposed Premises to operate in the manner described by this document.

Trading Hours

Monday to Wednesday:	9.00am to 8.00pm
Thursday to Saturday:	9.00am to 9.00pm
Sunday:	10.00am to 7.00pm

The proposed trading hours as indicated above are subject to approval by Blue Mountains City Council and the Authority.

Staffing Levels

3 full time staff assisted by 5 permanent part time casual staff.

Security Features

Security features have been included in the design and layout of the Proposed Premises and which focus on the prevention of underage purchases and secondary sales. A security system incorporating a closed circuit television system will be installed within the Proposed Premises. The security system will be monitored 24 hours a day, 7 days a week whilst the closed circuit television system will be monitored within the Proposed Premises. The digital recordings from the closed circuit television system will be retained for 30 days before being re- utilised within the system.

House Policy

The Proposed Premises will adopt Woolworths Ltd's *House Policy*, a copy of which is included in Annexure "B". The *House Policy* is directed towards complying with the Liquor Act and requirements which includes ensuring that:

- persons under 18 years of age do not purchase liquor or have liquor purchased on behalf of them. Staff must request any customer who looks to be under 25 years of age to produce ID and they must also focus on preventing secondary sales to minor.
- liquor is not sold to intoxicated persons

Commitment to Local Liquor Accord

The licensee of the Proposed Premises will be an active member of the Local Liquor Accord and promote the 'Responsible Service of Alcohol Policy' adopted by the Accord. As such the Proposed Premises will take a proactive approach to addressing any real or perceived concerns directly attributable to alcohol related anti-social behaviour in the local or broader community.

Harm Minimisation and Responsible Service of Alcohol.

Woolworths is very experienced with the harm minimisation requirements under the 2007 Liquor Act and 2008 Liquor Regulation and provides to its staff significant and comprehensive training, supervision and reinforcement of those principles to ensure that liquor that is sold by it, is done so responsibly.

All persons who are suspected of being under 18 years will be required to produce an approved form of identification to prove they are 18 years of age or over before being supplied with liquor. Any person who appears to be over 18 but is unable to produce suitable identification upon request is not served liquor. Woolworths Ltd is also aware of persons over the age of 18 purchasing liquor for persons under the age of 18 years and staff will be instructed not to sell liquor to such persons in these circumstances. Staff will also be instructed to comply strictly with the *House Policy* of Woolworths Limited provided at Annexure "B" and the abovementioned requirements.

The Proposed Premises is particularly well suited to the type of harm reduction strategies which form part of this Application because it will be part of a major retail organisation with the resources, management expertise and operating experience to ensure that the policies and strategies are adopted and rigorously enforced.

In addition, Woolworths Limited is also a member of the Retail Liquor Stores Association and adopts relevant policies and procedures recommended by that Association at its licensed premises.

Best Practice Policies and Procedures

The Proposed Premises will adopt Woolworths Ltd's *Best Practice Policies and Procedures*, a copy of which is included in Annexure "C". These policies and procedures are to be continually updated and improved to assist staff in preventing secondary sales and sales to minors and to reduce or eliminate any alcohol related harms in the local or broader community.

Responsible Service of Alcohol Course

The Applicant has completed the Liquor Act and Responsible Service of Alcohol Course conducted by Woolworths Limited. All staff employed or to be employed within the Proposed Premises will be required to also complete the same courses. A register containing details of satisfactory completion of the responsible service of alcohol courses by all staff will be maintained at the Proposed Premises. In addition Woolworths provides on-going training and support to all staff involved in the sale and/or supply of liquor at its licensed premises.

Signage

At the front of the Proposed Premises a sign will be displayed indicating the name of the premises, the name of the licensee and the type of licence for the premises (that is a *Packaged Liquor Licence*).

The required signage, provided below will be prominently displayed at the Proposed Premises at each servery counter or cash register within the Proposed Premises.



The Licence (and its conditions) applicable to the Proposed Premises (when issued by the Authority) will be available to staff at the Proposed Premises at all times.

Other Information

Woolworths undertakes to support the Roads and Traffic Authority's initiatives at the Proposed Premises and which draw attention to the:-

1. RTA brochure *Drinking and Driving: The Facts* which outlines drink driving penalties, blood alcohol limits and how alcohol affects your driving; and
2. *Safe Party Kits* available on the NSW Police Force website when a customer is purchasing larger quantities of alcohol for a party or social event, and that a copy of the Safe Party Checklist be displayed at the Proposed Premises.

In the event that tastings occur at the Proposed Premises, the licensee will ensure free drinking water is available to customers at such times. Woolworths Ltd has also taken steps to prohibit or restrict activities (such as promotions or discounting) that could encourage misuse or abuse of liquor (such as binge drinking or excessive consumption) at all its licensed premises and in its promotional material.

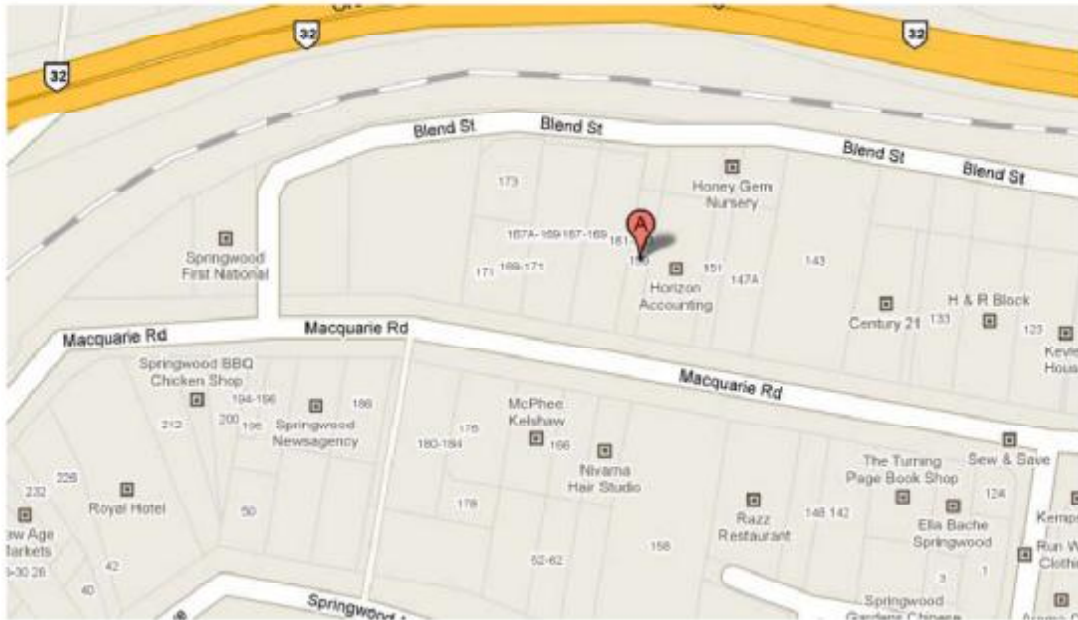
Concerns or Comments

Should you have any further concerns or questions regarding the Application please contact Tony Schwartz on (02) 9223 3355 or by email tschwartz@bsv.com.au who will be happy to assist.

Woolworths is committed to harm minimisation and responsible service of alcohol policies and procedures at all its licensed premises.

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Annexure A – Location Map



Locality Map

Address of Proposed Licensed Premises:
159 Macquarie Street, Springwood



= site of Proposed Licensed Premises



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Annexure B – House Policy

LIQUOR STORE “HOUSE POLICY”

THE LIQUOR STORE “HOUSE POLICY” IS A REFLECTION OF THE COMMITMENT BY ALL STAFF FOR THE ONGOING REQUIREMENT TO PROVIDE RESPONSIBLE SERVICE OF ALCOHOL AND TO AVOID THE HARM ASSOCIATED WITH MISUSE AND ABUSE OF ALCOHOL.

THE POLICY SHOULD BE A CONSTANT REMINDER TO ALL STAFF OF THEIR OBLIGATIONS AND THEY MUST ALWAYS:

- Ensure that persons under 18 years of age do not purchase liquor or have liquor purchased on behalf of them.
- Assess all customer’s ages by taking account of their height, weight, demeanour, confidence, facial hair, clothes, makeup, voice, wrinkles, hairstyle. Always ask oneself before serving:
 - “Could this person be under 25 years of age? – if yes ask for I.D.!!
- Ensure that liquor is not consumed on licensed premises.
- Ensure that liquor is not sold or displayed outside the licensed premises.
- Ensure that a range of low alcohol and non-alcoholic products are available for purchase.
- Ensure that the required “Liquor Act” signs are prominently displayed at all times.
- Ensure that all staff who work in the Liquor Store are properly trained in all areas of responsible service of alcohol in particular as to;
 - Knowing when to ask for Proof of Age identification
 - Knowing how to ask for Proof of Age identification
 - Knowing what four (4) approved forms of identification are acceptable (ie Current Photo Driver’s Licence, NSW Photo Card, “Proof of Age” card (valid until December 2008) and Passport).
 - Knowing what features to check when presented with Proof of Age identification to ensure the person is 18 years of age or over and that it is authentic and has not been tampered with.
 - Knowing that if upon request a person cannot produce an approved form of Proof of Age identification then the sale must not be made;
- **REMEMBER: NO PROOF NO PURCHASE!!!**
- Ensure that only persons 18 years of age or over sell or supply liquor.
- Be conscious of Secondary Purchase situations and be alert to groups of young persons both inside and (where possible) outside the licensed premises, in the endeavour to stop the supply of liquor to underage persons by older persons.
- Ensure that liquor is not sold or supplied to a person who is in a state of intoxication. In assessing whether a person may be intoxicated, as a guideline the following should be considered;
 - whether their speech is slurred or slow
 - whether their breath smells of alcohol
 - whether they have difficulty walking, standing or moving
 - whether they have difficulty understanding you, answering questions or asking for their intended purchase.
- Ensure that potential problems are identified and steps taken to avoid serious situations.

Annexure C – Woolworths Ltd’s Best Practice Policies and Procedures

Woolworths’ *Best Practice* Policies and Interventions.

Woolworths Limited (“Woolworths”) chooses to implement a *best practice* set of interventions at all its licensed premises to reduce any alcohol related harms in the local communities in which it operates. Woolworths’ *best practice* policies and procedures have the following objectives:-

- to promote proper and efficient management practices in all of its licensed premises
- to ensure each licensed premises implements and rigorously enforces the *industry code of practice* and Woolworths’ *Liquor Store House Policy*.
- to ensure each licensed premises implements a *Proof of Age and Incident Register*.
- to ensure all employees involved in the sale and/or supply of liquor receive proper training, support and guidance of the harmful effects of alcohol such as:-
 - anti-social behaviour
 - intoxication
 - underage drinking
 - alcohol related crime
 - harm to oneself or others
- to reduce negative consumer behaviour associated with the sale or supply of alcohol
- to prevent promotions that encourage misuse or abuse of liquor
- to be able to detect intoxication
- to provide a clear set of criteria for detecting underage persons in its licensed premises and ways of identifying fake or tampered *proof of age* identification
- to provide a clear set of warning signs where there is possibly a risk of secondary sales such as:-
 - Minors accompanying an adult when the purchase is made
 - Minors suggesting the purchase of liquor to the adult
 - Minors congregating outside or adjacent to the premises
 - Possible evidence of pooling of money by minors and handing the money to an adult before the liquor is purchased
 - Minors refused service and within a short time an adult enters the premises to buy the same type of liquor that the minor attempted to purchase

As part of *Woolworths’ best practice* policy and procedures it has implemented an approved Responsible Service of Alcohol training course for all of its employees involved in the sale and or supply of alcohol. That course of training has been scrutinised by the former Liquor Administration Board (the “Board”) on many occasions; is approved by the Authority and is delivered to employees by highly qualified and skilled instructors who are also able to provide ongoing assistance and guidance. Woolworths has developed internal policies and procedures to ensure compliance with its *best practice* policies and procedures. It has implemented a *liquor store checklist audit* system where the licensees are continually reminded of their obligations and Woolworths’ *best practice* policies and procedures. The level of success of Woolworths’ *best practice* policies and procedures is evident by its good record with the Court, Board and Authority. Woolworths is rarely implicated in any complaint or apparent adverse social consequences or incidents in any of its licensed premises.