



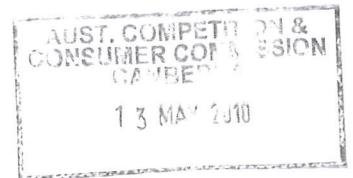
CLUBS QUEENSLAND
Voice of Queensland Clubs

12 May 2010

FILE No:
DOC:
MARS/PRISM:

David Seccombe

Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601



Dear **David**

Re: Liquor Accord Application - No. 41613

I am writing **in support** of the Queensland Office of Liquor and Gaming Regulation's Liquor Accord Application.

The Liquor Accord is provided under Section 224 of the *Liquor Act 1992* (Qld). It is a harm minimisation measure that has "**in-principle**" support of all industry sectors, including community clubs, in Queensland. In fact, a number of community clubs are already members of local Liquor Accords.

The Community Clubs sector includes around 930 liquor-licensed venues. The provision of alcohol is an integral part of the club offering, with net proceeds re-invested for the benefit of members and local communities. It not only makes business sense but also falls within the wider social obligations of community clubs to promote responsible service and supply of alcohol.

Community clubs have long recognised the problem of alcohol abuse/misuse and have worked with a range of stakeholders internally and externally to address the social problem. The Liquor Accord, in our view, is a highly effective tool. It has the capacity to bring interested parties such as the council, police and community groups together to resolve emerging problems with local insight and local resources. This almost always has immediate impact as it requires participating venues to implement a range of measures to address community concerns.

It is important to note that the Liquor Act does not impose conditions on how a Liquor Accord should be administered or bind the stakeholders. This has created some difficulty in the implementation process and it's hoped the current application, when approved, will go a long way to provide the necessary framework and protection for the liquor accord participants.

It is apparent that the current application contains some anti-competitive provisions however these are necessary for the effective functioning of the Liquor Accord. As long as membership of the Liquor Accord remains **voluntary**, these provisions, in our view, do not operate like cartel provisions, but rather for the wider public good.

I hope the above comments are of assistance and please do not hesitate to contact me should you require any clarification.

Yours sincerely



Doug Flockhart
Chief Executive Officer