

21 October 2013

Megan Cunningham
Senior Project Officer
Australian Competition & Consumer Commission
360 Elizabeth Street
Melbourne VIC 3000

Response to QNADA submission

Dear Ms Cunningham,

Thank you for providing the CBD Townsville Liquor Accord the opportunity of responding to the submission lodged by QNADA.

The CBD Townsville Liquor Accord is generally supportive of the submission provided by QNADA, however disagrees with their position that there should be "enforcement of the Accords".

It is our position that Liquor Accords need the strong support of the relevant statutory authorities, and that appropriate action must be taken by authorities against those individuals or organisations found to be in breach of their legislative requirements.

Liquor Accords by their very nature however, are voluntarily formed by individuals and organisations that generally share a common view with how to best address local issues. This often leads to members agreeing to be voluntarily bound to a set of rules and expectations that are additional to legislative requirements and are often particularly onerous.

The CBD Townsville Liquor Accord believes that if there were "enforcement of the Accords" that was <u>additional</u> to the legislative requirements, that there is the potential that members would simply refuse to participate, resulting in the Accord not having appropriate levels of membership to continue.

I am happy to expand furher should it be required.

Yours faithfully

Greg Powell Secretary