

17 February 2025

Hon Andrea Michaels MP  
Minister for Consumer and Business Affairs  
GPO Box 464  
ADELAIDE SA 5001

Dear Minister,

**RE: Draft Liquor Licensing (Miscellaneous) Amendment Bill 2024**

COTA SA welcomes the opportunity to provide feedback on the draft Liquor Licensing (Miscellaneous) Amendment Bill 2024. As an organisation dedicated to representing the rights, interests, and futures of approximately 700,000 older South Australians, we are committed to ensuring that legislative reforms consider the diverse needs of our ageing population.

We commend the State Government's initiative to review the Liquor Licensing Act 1997, and to apply a filter addressing various social and public health concerns, including measures against gender-based violence, and protections for individuals vulnerable to alcohol-related harm and gambling-related harm. These objectives align with our commitment to fostering safe and inclusive communities for all South Australians.

In particular, we support the proposed amendments that focus on protecting vulnerable individuals from alcohol-related harm. Allowing individuals to request self-exclusion from certain premises and regulating alcohol delivery times are proactive steps toward reducing harm and promoting personal responsibility. We believe these measures will contribute to safer environments, especially for older adults who may be more susceptible to alcohol-related risks<sup>i</sup>.

COTA SA's consumer engagement and research team, The Plug-in, conducted a four-stage research project in partnership with the South Australian Government's Office for Women in 2024, exploring the unique experiences of older women who have faced family, domestic, and sexual violence (FDSV) in South Australia. The research identified alcohol and drug use as significant risk factors contributing to FDSV<sup>ii</sup>. Consultations with service providers highlighted the strong interrelation between substance abuse, mental health challenges, and family violence, particularly affecting older women, with adult sons often identified as the perpetrators.

These findings underscore the need for targeted interventions that address these interconnected factors to effectively reduce FDSV among older adults. Considering this data, we appreciate the emphasis on measures to prevent gender-based violence. Creating safer public spaces is crucial for all community members, including older women who may feel particularly vulnerable. We encourage the Government to consider additional training and resources for venue staff to increase awareness and capacity to effectively manage and prevent such incidents.

Additionally, we support the insertion of the "primary purpose test" in the proposed amendments. COTA SA is aware that around a third of men and almost a quarter of women aged 55 or older are at risk of experiencing gambling harm, with significant negative financial, health and social impacts on individuals and families<sup>iii</sup>. Gaming

Machines, or 'pokies', are highly prevalent in our state, and the most highly used mode of gambling<sup>iv</sup>. A 2018 prevalence study in South Australia, found that gambling participation peaked at ages 45-64 years (71%) in comparison to younger counterparts (56% for 18 to 24 year olds)<sup>v</sup>. It is reasonable therefore, that South Australian hotels and other licenced venues including some community clubs, should be limited in their operation of Gaming Machines, to reduce the risk of harm, including to vulnerable older people.

Overall, COTA SA supports the overarching goals of the draft Liquor Licensing (Miscellaneous) Amendment Bill 2024. We believe that with careful consideration and appropriate safeguards, these reforms can enhance community safety and well-being. We look forward to ongoing engagement with the Government to ensure that the interests of older South Australians are adequately represented in this legislative process.

Thank you for the opportunity to provide input on this important matter.

Yours sincerely,

**Miranda Starke**  
Chief Executive

---

<sup>i</sup> Australian Institute of Health and Welfare, [Alcohol, tobacco & other drugs in Australia, Older people - Australian Institute of Health and Welfare](#)

<sup>ii</sup> It is important to note, while alcohol and drug use was identified as a key risk factor of DFSV, the perpetrator's behaviour is always the primary cause of the violence experienced, which was heavily discussed by participants in our consultation: <https://cotasa.org.au/programs-and-services/older-womens-services-and-supports>

<sup>iii</sup> Australian Institute of Health and Welfare, *Gambling in Australia*, 7 Sept 2023 <https://www.aihw.gov.au/reports/australias-welfare/gambling>

<sup>iv</sup> Report of the Auditor-General, Gambling harm minimisation, Report 3 of 2023, [https://www.audit.sa.gov.au/sites/default/files/2023-05/Report%203%20of%202023%20-%20Gambling%20harm%20minimisation\\_0.pdf](https://www.audit.sa.gov.au/sites/default/files/2023-05/Report%203%20of%202023%20-%20Gambling%20harm%20minimisation_0.pdf)

<sup>v</sup> Department of Human Services South Australia, *Gambling Prevalence in South Australia*, December 2018 [https://gamblingharmssupport.sa.gov.au/\\_data/assets-pdf\\_file/0014/164111/2018-SA-Gambling-Prevalence-Survey-Final-Report-Updated-07.02.19.pdf](https://gamblingharmssupport.sa.gov.au/_data/assets-pdf_file/0014/164111/2018-SA-Gambling-Prevalence-Survey-Final-Report-Updated-07.02.19.pdf)