



13 May 2021

Inquiry into reform of South Australia's regulatory framework
South Australian Productivity Commission

By Email: Hayley.Gossert2@sa.gov.au

To whom it may concern

I write regarding in response to the South Australian Productivity Commission's recent issues paper and inquiry into reform of South Australia's regulatory framework. R&CA is pleased to be able to provide its comments to the commission on proposed areas of regulatory reform to further assist Restaurants, Cafes & Caterers run their businesses in SA.

Restaurant & Catering Australia (R&CA) is the national industry association representing the interests of over 48,000 restaurants, cafés, and catering businesses across Australia. The café, restaurant and catering sector is vitally important to the national economy, generating over \$38 billion in retail turnover pre-covid each year as well as employing 580,000 people. Critically, over 93 per cent of businesses in the café, restaurant and catering sector are small businesses, employing 19 people or less.

In South Australia there are 2,687 Restaurants, Cafes and Caterers employing nearly 40,000 people.

R&CA delivers tangible outcomes to small businesses within the hospitality industry by influencing the policy decisions and regulations that impact the sector's operating environment. R&CA is committed to ensuring the industry is recognised as one of excellence, professionalism, profitability and sustainability. This includes advocating the broader social and economic contribution of the sector to industry and government stakeholders, as well as highlighting the value of the restaurant experience to the public.

Tell us Once/One Stop Shop Approach to Regulator Practice

Businesses within our sector routinely deal with multiple regulators across local & state governments on issues like Food Safety, Work Health and Safety & Liquor Licensing. Often, these regulators operate in silos with little co-ordination

between them, despite them regulatory the same businesses, albeit enforcing differing regulations.

Thought should be given to combining these regulators activities into single 'one stop shop' regulators, who could coordinate legislative burdens, reduce duplication and simplifying the compliance process for small businesses. This could be especially useful in terms of inspections and license renewals.

Interim Authorisations

Interim Restaurant Authorizations, introduced into NSW Liquor legislation in 2017 and represent a simple but significant departure from previous regulatory practice, that R&CA believes should be followed in other states.

An interim restaurant authorisation allows you to begin serving liquor as soon as you have lodged a liquor licence application.

To be eligible, you must:

- apply online for an on-premises liquor licence for a restaurant
- seek standard trading hours
- have planning approval from the local council to use the premises as a restaurant or café, and have informed the community of the intention to serve alcohol as part of the public exhibition process (often this is the case of a new operator opening in an existing restaurant site)
- not apply for authorisations including extended trading hours or primary service authorisation (PSA).

Interim restaurant authorisations are exempt from the Community Impact requirements under the liquor laws, as public consultation occurs as part of the development approval process with council.

R&CA believes that, these interim authorizations have utility not just in the liquor space but broader as well, whereby regulators then need to provide a 'why not' response to an application rather than the proponent requiring to prove the 'why' before they can open their business.

Reducing the time takes to open a business in SA

R&CA has long been supporters of the NSW Government's Easy to do Business Program, and believes there is significant scope to expand its usage into other state jurisdictions such as SA. Easy to do Business is an online, one-stop-shop for business customers, streamlining the way businesses transact with all levels of government to obtain the information, approvals and licences they need, cutting time and money.

The first phase of Easy to do Business has focused on the high-growth café, restaurant and small bar sector.

Previously, those wanting to start up and run a café, restaurant or small bar would have to deal with up to 13 agencies, 75 regulations, 30 phone numbers and 48 forms, and wait up to 18 months.

Customers in participating local government areas can now open a café, restaurant or small bar in 90 days or less by filling in one online form or making one phone call.

Helping Local Government Standardize Common Rules

One common complaint amongst R&CA members in the inconsistent rules that are in place across varying local council relating to issues such as Outdoor Dining. R&CA submits there is an opportunity for the SA Government to play a leadership role in identifying where these inconsistencies are most damaging to business activity and working to standardize those rules wherever possible.

Conclusion

R&CA appreciates the opportunity to provide comment to South Australian Productivity Commission's recent issues paper and inquiry into reform of South Australia's regulatory framework.

If you have any questions or wish to discuss R&CA's views in more detail, do not hesitate to contact R&CA's Head of Policy, Government & Public Affairs, Tom Green on 0448 781 213.

Regards

A handwritten signature in black ink, appearing to be 'Wes Lambert', written in a cursive style.

Wes Lambert CPA FGIA MAICD
Chief Executive Officer
Restaurant & Catering Australia