

From: info@waitomo.govt.nz
Sent: Tuesday, 29 April 2025 4:37 pm
To: haveyoursay
Cc: [REDACTED]
Subject: Submission - Draft Alcohol Fees Bylaw 2025

Caution! This message was sent from outside your organization.

[Block sender](#) | [Report](#)

Thank you for your feedback

Name

Marisa Bidois

Organisation (if responding on behalf of)

Restaurarnt Association of NZ

Email

marisa@restaurantnz.co.nz

Phone

[REDACTED]

Address

[REDACTED]

Mount Eden, Auckland 1024, New Zealand

Consent for storing submitted data

True

Do you agree on the preferred Option 1?

No

If you answered no:

The Restaurant Association of New Zealand (the Restaurant Association) welcomes the opportunity to submit on the Waitomo District Council Draft Alcohol Fees Bylaw 2025.

Since 1972, the Restaurant Association has worked to offer advice, help and assistance in every facet of the vibrant and diverse hospitality industry, covering the length and breadth of the country. We're passionate about our vibrant industry, which is full of interesting, talented and entrepreneurial people.

While the Restaurant Association understands the Council's desire to introduce an alcohol licensing fees bylaw, we do not support the proposed method put forward by the Council.

The Restaurant Association supports a staggered approach to increasing alcohol licensing fees, but we recommend that a cap on annual fee increases be adopted by the Council, limiting annual alcohol licensing fee increases to a maximum of no greater than 15%. We would also like to highlight our other priorities for local alcohol fee bylaws:

Where fee increases are proposed, ensuring they are phased in over a reasonable timeframe
Ensuring Councils are transparent about the cost of alcohol licensing, including which types of licence incur greater costs to the council

Retaining a minimum 30% of alcohol licensing costs to be paid for through general rates, in recognition of the benefit of a thriving hospitality industry to local communities, and
Advocating to Central Government for a review of risk ratings set out in legislation.

Phased fee increases

While we recognise that licensing fees were set by legislation 11 years ago, and that Councils across the country need to recover costs, it is our position that businesses should not be hit with such drastic fee increases simply because their local council had not adopted an alcohol fees bylaw sooner.

For that reason we recommend that all councils take a more gradual approach to fee increases, by more evenly distributing the cumulative increase over a longer period. Further, we recommend that a cap on annual fee increases be adopted by the Council, limiting annual alcohol licensing fee increases to a maximum of no greater than 15%.

Council transparency

We are concerned that many Councils across the country use cost recovery as a blanket justification for increasing fees across the board, often without any transparency around actual costs incurred by the Council.

It is our position that Councils should provide evidence of the actual cost of processing licences as part of their consultation, so licencees can have confidence that the amount being recovered is accurate and fair. This breakdown should also include the difference in cost of processing on-licences compared to off-licences, with a view to recovering costs on a more proportionate basis in the future.

Finally, we would like to see that Councils have sought to improve efficiencies or cut the internal cost of alcohol licences before passing these costs on to licencees. Businesses are not an endless source of funds that can withstand constant levying by local authorities, and we submit that there must be an attempt on behalf of regulatory bodies across the country to build confidence in their activities.

Public benefit of hospitality

The Restaurant Association submits that all Councils should retain a ratepayer contribution of 30% to alcohol licensing fees, to recognise the contribution of well-managed hospitality venues to the life and economy of communities, and the societal value of having facilities available where people can go to enjoy themselves while drinking safely and responsibly.

Arguments against retaining a ratepayer contribution often cite the user-pays intention of the Act as justification for complete (or almost complete) cost recovery through licensing fees. We submit that ratepayers are part of the user-pays licensing system, and rather than relying on venues to increase prices to cover fee increases, the Council should support access to affordable hospitality for all through its setting of fees.

Review of current risk ranking

The Restaurant Association recognises the need to ensure the sale and supply of alcohol is undertaken safely and responsibly. However, we are concerned that the rigid risk rating formula contained in legislation is out of date and no longer matches the realities of modern hospitality environments.

It is important that legislation and bylaws recognise there is not only a difference between on- and

off-licence venues, but that there is also a difference between types of on-licence venue: for example, both a night club and a restaurant are on-licence venues, but prima facie these businesses have two very different risk profiles.

Our more than 2,500-strong membership is made up of hospitality businesses where food is the hero of their operations, with alcoholic beverages offered as a supplement to their culinary experience. We therefore believe that a more fulsome review of the risk rating of premises within the regulations to better reflect the actual risk of harm.

We recognise that the setting of risk ratings is not within the control of this Council, and therefore recommend that the Council passes a resolution in support of a Ministry of Justice review of the risk ratings in legislation, to better reflect the risks of different types of licensed premises.

Thank you for the opportunity to provide feedback on your draft alcohol fees bylaw. We would be happy to discuss any part of this submission in more detail, and to provide any assistance that you may require.

I wish to speak to Council about my submission

No

Are you a robot?