



Submission on the Matamata-Piako District Council Draft Fees and Charges Policy 2024/25

21 April 2024

Tēnā koutou

Thank you for the opportunity to provide feedback on the Draft Fees and Charges Policy 2024/25. We are submitting specifically on alcohol licensing fees.

We would like the opportunity to speak (virtually) to our submission.

If you have any questions on the comments we have included in our submission, please contact:

Andrew Galloway
Executive Director
Alcohol Healthwatch
P.O. Box 99407, Newmarket, Auckland 1149



About Alcohol Healthwatch

Alcohol Healthwatch is an independent national charity working to reduce alcohol-related harm and inequities. We are contracted by Health New Zealand–Te Whatu Ora to provide a range of regional and national health promotion services. These include: providing evidence-based information and advice on policy and planning matters; coordinating networks and projects to address alcohol-related harms, such as alcohol-related injury and fetal alcohol spectrum disorder; and coordinating or otherwise supporting community action projects.

Specific Comments

1. Alcohol Healthwatch supports the review by Matamata-Piako District Council the Fees and Charges Policy and note that the alcohol licensing fees will remain at the 2023/24 level.
2. We support a full cost recovery approach for alcohol licensing, as while full cost recovery was envisaged by the Sale and Supply of Alcohol Act 2012, the fees set under the Sale and Supply of Alcohol (Fees) Regulations 2013 have not kept pace

with the costs incurred by Council. This inevitably means that without setting realistic fees, the Council (and ratepayers) would be subsidising the costs associated with alcohol licensing.

3. We note that while fees are set by set by regulation, the Council has the ability to make a bylaw under the Sale and Supply of Alcohol (Fee-setting Bylaws) Order 2013 and alter these nationally fixed amounts and set fees that reflect the Council's actual costs as a licensing authority, and in respect of its inspection and enforcement functions.
4. We support a comprehensive review of all the costs incurred with licensing, which includes costs associated with administration, monitoring and enforcement to ensure that these are met by the sector.
5. Revising fees in a timely manner would we believe meet the policy objectives of the licensing fees regime, namely:
 - (a) To recover the total reasonable costs incurred by the Council in administering the alcohol licensing system
 - (b) To ensure that those who create the greatest need for regulatory effort bear the commensurate costs
 - (c) To allow local circumstances to be reflected in the fees paid by operators and income received by the Council
 - (d) To minimise alcohol-related harm, to the extent that this can be achieved through a cost recovery regime.

Additional comments

6. We further note that under the section 404 of the 2012 Act, the Ministry of Justice is required to undertake a five-year review of alcohol licensing fees and of cost recovery by councils. However, this review is overdue, and we would encourage the Council to advocate to Central Government for a timely review of the Sale and Supply of Alcohol (Fees) Regulations 2013.
7. Remuneration of District Licensing Committee members is also generally determined by the Ministry of Justice under the Cabinet Fees Framework (CO(22)2). We understand that the current fee for members is set at \$51 per hour or \$78 per hour for the DLC chairperson. We consider that these rates should be reviewed to ensure that a greater pool of applicants may be attracted to undertake this work if remunerated adequately.