



Public Interest Assessment

Form 2A

Under the *Liquor Control Act 1988* (LC Act), the Director of Liquor Licensing (DLL) has the discretion to grant or refuse any application if the DLL considers this to be in the public interest.¹ The DLL requires certain applicants to fill in this Public Interest Assessment (PIA) form and provide supporting evidence that their application is in the public interest.² If you are applying for the grant of any of the following licences, or the removal of one of these types of existing licence to another premises, you will need to complete a PIA to provide evidence that your application is in the public interest:

- hotel/hotel restricted
- tavern/tavern restricted
- liquor store
- nightclub.³

A PIA is also required if you are applying for an extended trading permit for extended hours, which has a duration of more than 3 weeks⁴, or for a temporary bar (refer to the [Temporary bars policy](#)). The DLL may also ask for a PIA to be prepared as part of any application under the LC Act, and will ask for one if it would assist in deciding whether the grant of the application is in the public interest.

The DLL will consider the following factors when determining whether granting the application is in the public interest, but this list is not exhaustive:

- the harm that might be caused due to the use of alcohol
- whether there might be a decrease in the amenity, quiet or good order of the locality
- whether people who live or work nearby might suffer offence, annoyance, disturbance or inconvenience
- how it might affect tourism, culture and the community.⁵

The level of detail required will be unique to each PIA. If you do not provide enough information, your application might not succeed or you might be asked to provide further information.

¹ LC Act s33(1).

² LC Act s38(3).

³ Liquor Control Regulations (LC Regs) r9EA.

⁴ LC Regs r9F.

⁵ LC Act s5 and s38(4).

Your completed PIA will be made publicly available and may be [advertised on the DLGSC website](#), allowing the community an opportunity to make submissions on it. Because it will be made public, do not include sensitive or personal information on this form. You can complete this PIA by taking a common-sense approach and you don't need a lawyer or a consultant to fill it in. The PIA form is a guide, and it is up to the applicant to satisfy the DLL that their application is in the public interest. If you do not have enough space, attach extra pages or prepare a separate submission. If you prepare your PIA as a separate submission, please refer to each of the question numbers on this form, so we know what question you are responding to. Lodge this form by submitting it with your application at portal.dlgsc.wa.gov.au

Part 1 — Application details

Applicant name:

ALDI FOODS PTY LTD

What licence or permit type are you applying for?

LIQUOR STORE LICENCE + ETP (HOURS - SUNDAY - ONGOING)

Are you applying for:

New licence and ETP

Removal of existing licence (which licence/permit type)

Premises trading name:

ALDI WONTHELLA

Address of proposed premises:

ALDI WONTHELLA, 46 NORTH WEST COASTAL HIGHWAY,
WONTHELLA, WA 6530

If you are lodging an application for an extended trading permit for extended hours at the same time as an application for the grant of a licence, you should submit separate PIAs for each. This is because the information required for each may be different and the DLL may approve the licence but not the extended trading hours.

Part 2 — Manner of trade

Please provide enough information for us to understand how you are intending to run your business, so we can understand the impact it will have on the community and the potential for it to cause alcohol related harm.

2.1 What is the proposed manner of trade and your target client base?

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA
PATTERSON LAW & CONSULTANCY PTY LTD

2.2 Describe the premises/proposed premises. Include a map of the locality and a floor plan detailing the nature and layout of the premises, highlighting the unique aspects of the proposed facility. What is the maximum number of patrons permitted on the premises? How will the proposed premises contribute to the streetscape and atmosphere of the area?

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

2.3 If you intend to sell packaged liquor, give the names and addresses of all existing licensed premises within the locality. The LC Act puts limitations on how many packaged liquor premises can be in a certain location. Refer to [Outlet Density — Packaged liquor premises](#) for more information.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

Part 3 — The profile of the local community

The better you capture the characteristics of the local community, the better the DLL will be able to understand the potential impact the grant of your application could have on the public interest. Your local government may have information about the area around the proposed premises, and you should seek useful data and statistics from a variety of sites, such as: www.police.wa.gov.au/crime/crimestatistics and www.abs.gov.au

You need to provide profile information from the *locality* that is within a certain distance to your intended business. If your intended business is:

- within 15km of the Perth CBD, the locality is a radius of 2km of it
- anywhere else (unless remote), the locality is a radius of 3km of it
- in a remote area, you should make a submission on what the appropriate size of the locality should be. Remote areas are those where the nearest town is at least 200km away and Perth is at least 400km away.

If you think the above definitions of locality are not appropriate for your intended business, make a separate submission on what you think the size should be.

3.1 Please outline the population characteristics in the locality. Helpful demographic information will include the total population, estimated population growth, average age, income and employment status, and the type of people who live and work in the community.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA

PATTERSON LAW & CONSULTANCY PTY LTD.

3.3 List the community buildings in the locality If any of the following are in the locality, please provide their names and addresses: schools and educational institutions, hospitals, hospices, aged care facilities, churches/places of worship, drug and alcohol treatment centres, short term accommodation or refuges, childcare centres, or a local government.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA

PATTERSON LAW & CONSULTANCY PTY LTD

- designed with sufficient parking and with good transport options available, it will allow patrons to leave the area quickly rather than potentially inconveniencing the neighbours
- provided with sound insulation sufficient for the proposed entertainment, it will prevent the surrounds from being exposed to unacceptable noise.

5.1 How will your premises design protect the amenity, quiet or good order of the locality?

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

Part 6 — Impact on the people who live or work nearby, and whether they might suffer offence, annoyance, disturbance or inconvenience

You need to demonstrate how your business will be a responsible member of the community and minimise negative impacts on the people who live or work nearby. For example, this could include:

- keeping the premises and surrounds clean and tidy, monitoring patron behaviour and discouraging anti-social behaviour
- ensuring that any entertainment is in keeping with the locality, that those present are within the allowed accommodation numbers and licensed crowd controllers are used if required
- asking departing patrons to keep the noise down so they do not disturb the neighbourhood
- being responsive to any complaints from neighbours and working with them to resolve issues.


7.2 If you have any other information to provide in support of your application, include it here.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

Part 8 — Declaration

I declare that the contents of this document and attachments are true, correct and complete and that I have made all reasonable inquiries to obtain the information required.

I acknowledge that under section 159 of the *Liquor Control Act 1988* it is an offence to provide false, misleading or incomplete information in this document.



Signature of applicant/s

RADU POPESCU,
ALDI REAL ESTATE DIRECTOR

31 / 12 / 2025

Date

Signature of applicant/s

Date

Signature of applicant/s

Date

Signature of applicant/s

Date



ALDI Foods Pty Ltd

**applicant for the conditional grant of a liquor store licence
and extended trading permit (hours – Sunday – ongoing)**

in respect of premises situated at

46 North West Coastal Highway, Wonthella

to be known as

ALDI Wonthella

Public Interest Assessment Form 2A Annexure

including section 36B submissions



**JESSICA
PATTERSON**

Law & Consultancy Pty Ltd
Liquor | Hospitality | Tourism | Events

Prepared on behalf of and together with the applicant by:

Jessica Patterson Law & Consultancy Pty Ltd

ACN: 648 525 204

PH: +61 409 599 093

E: jessica.patterson@jplc.com.au

www.jplc.com.au

Table of Contents

1. Executive summary	3
2. Introduction and background.....	4
3. Brief outline of the application	5
4. Applicant’s background	6
5. The liquor – ALDI exclusive products.....	14
6. Form 2A “Part 2 – Manner of trade”	18
7. Form 2A “Part 3 – The profile of the local community”	42
8. Form 2A “Part 4 – Minimising the potential for alcohol to cause harm”	51
9. Form 2A “Part 5 – Impact on the amenity, quiet or good order of the locality”	62
10. Form 2A “Part 6 – Impact on the people who live or work nearby and whether they might suffer offence, annoyance, disturbance or inconvenience”	64
11. Form 2A “Part 7 – Impact on tourism, culture and the community”	65
12. Local packaged liquor requirements - section 36B of the Act	73
13. Sections 5, 33, 36B, 38 and 60 of the Act.....	78
14. Conclusion	79

1. Executive summary

- 1.1. This application involves a proposal for an incredibly popular liquor service, to operate from a small and modest licensed area, to be located in the existing ALDI Wonthella store that already has a substantial regular patronage of over 8,000 shoppers per week on average.
- 1.2. The liquor range, comprising many award-winning products, is almost entirely exclusive to the applicant and not currently available for hundreds of kilometres.
- 1.3. Staff at the ALDI Wonthella store receive customer requests and expectation for liquor, surprise that the store does not have the feature and dissatisfaction at not being able to access ALDI liquor anywhere in the district. The nearest ALDI liquor outlet is 323km south, in Yanchep.
- 1.4. The liquor store model is well-known, sought-after by the public and has been previously approved by the licensing authority on many occasions elsewhere in the State.
- 1.5. The applicant is well-known, highly sophisticated and enjoys an excellent trading compliance record.
- 1.6. The location is well suited to the proposed liquor service and has no unusual sensitivities or overly high risks associated with it given all of the circumstances.
- 1.7. The application is strongly supported and demanded by the relevant community. Evidence of this support and demand is attached and referred to throughout this document.
- 1.8. The expert market researcher has found that “[t]he survey of Wonthella ALDI shoppers showed considerable support for and intended use of the proposed liquor section for that store”¹. The survey results reveal that thousands of shoppers are expected to purchase liquor from the little ALDI store each week if the licence is approved.
- 1.9. A demand/supply analysis of relevant factors in this case reveals that demand cannot reasonably be met by supply and so justifies the grant of the licence².
- 1.10. The application is supported by a substantial volume of compelling evidence which goes far above and beyond the level or degree of requirement capable of justifying the grant³.

¹ Survey Of The Consumer Requirement For Liquor Retailing Amongst shoppers in The ALDI Supermarket in Wonthella, by Patterson Research Group (**PRG**), dated November 2024, at section 2.0, page 6 (**PRG Report**) (attached). PRG and Jessica Patterson Law & Consultancy Pty Ltd are totally unrelated entities. The commonality of the name “Patterson” is purely coincidental.

² *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* [2024] WASC 128 (**Liquorland Southern River**) [57] (Lemonis J)

³ *Liquorland Southern River* [128] [137] (Lemonis J)

2. Introduction and background

- 2.1. ALDI Foods Pty Limited (ACN 086 210 139) (**ALDI**⁴) seeks the conditional grant of a liquor store licence and extended trading permit (**ETP**) pursuant to sections 33, 38, 36B, 47, 60(4)(g), 62, 68(1) and (2a) and 98D of the Liquor Control Act 1988 (WA)(**Act**) for a very small section of its supermarket premises already located at 46 North West Coastal Highway, Wonthella, known as ALDI Wonthella.
- 2.2. This document has been prepared as an annexure to and in accordance with the Public Interest Assessment Form 2A of the Department of Local Government Industry Regulation and Safety (**Department**) (**Form 2A**). Together they comprise the applicant's Public Interest Assessment (**PIA**). The PIA has been prepared in accordance with the Act and with reference to relevant Departmental policies.
- 2.3. As directed by the Department, the applicant has applied a "common-sense approach"⁵ to the preparation of the PIA. Further in this regard, the applicant has considered the State Government's promotion of reform in the WA liquor licensing regime to make it less complicated and "easier to do business"⁶. Therefore, the applicant has provided a level of detail considered appropriate for the circumstances in terms of the content of this document and the attachments. This approach is consistent with sections 16(7)(b) and (c) of the Act and considering that there is no minimum or threshold level of consumer requirement evidence⁷ and the ALDI offer is well known, proven to be compliant and modest. Further detail, additional copies of source material and supplementary supporting evidence can be provided if necessary.
- 2.4. Hundreds of members of the public have provided evidence of strong demand for the ALDI liquor service in Wonthella. This evidence is based largely on consumers with first-hand knowledge of the proposed liquor model. PRG found that "[m]ore than eight in ten (82%) of the Wonthella ALDI shoppers have previously been in an ALDI store that has a packaged liquor section: it is not a new concept for them"⁸.
- 2.5. The applicant is motivated and able to address the community requirement, as soon as this application is approved. The proposed licensed area can be quickly established.
- 2.6. This PIA has been formally adopted and verified by a senior representative of ALDI by way of signing the covering Form 2A.

⁴ Including related entities forming the ALDI group

⁵ Form 2A page 2 and at:

<https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

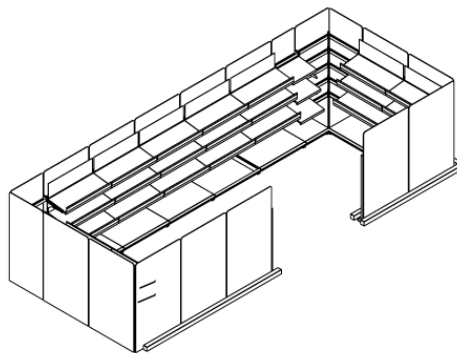
⁶ For example: <https://www.cifs.wa.gov.au/department/news/news-article/2024/08/29/liquor-licensing-policy-reform-a-big-win-for-wa-hospitality-industry>

⁷ Liquorland Southern River [126] and [128] (Lemonis J)

⁸ At para 4.4, page 17

3. Brief outline of the application

- 3.1. The applicant proposes a petite liquor display/browse and checkout section, together with a licensed office, of only approximately 48m² within the existing ALDI Wonthella store.
- 3.2. A small but carefully selected and exclusive range of unrefrigerated liquor is proposed to be available in a discrete and clearly designated licensed area under the same roof as the existing ALDI Wonthella store. The size, layout and style of operation will be almost identical to existing ALDI liquor store licences trading elsewhere in WA.
- 3.3. This liquor store model is unique to ALDI. Its various features, referred to throughout this PIA, make for a bespoke manner of trade. The boutique type of liquor service perfectly complements the diverse and popular range of ALDI's distinctive non-liquor services and facilities. This creates an exceptional one-stop shopping convenience for customers, which is a key feature of the ALDI offering. Customers can even benefit from one-transaction shopping at ALDI, thereby satisfying the growing society demand for enhanced convenience.
- 3.4. Pictured below is an aerial render that is generally indicative of what is proposed as the liquor display/browse area. The checkout is located next to the entrance that is depicted. The boundary partitioning is proposed to be made of 2.1 metre high opaque frosted glass which is depicted in the subsequent photograph.



- 3.5. Additional details of the ALDI liquor offering are provided further on in this PIA.
- 3.6. As referred to elsewhere in this PIA, the applicant consulted with local consumers and received overwhelming support. Hundreds of people have provided evidence that has encouraged ALDI to lodge this application and seek approval to provide liquor at its Wonthella store.
- 3.7. Members of the Wonthella community and other consumers in the area where the ALDI store is located, will have the opportunity to enjoy the full range of ALDI's offering, including its liquor service, if this application is approved, so as to provide them with the same valuable choice, diversity and specialty range as many other communities in Australia enjoy.

4. Applicant's background

- 4.1. ALDI operates more than 10,000 stores across 20 countries and is one of the largest and most popular retailers in the world. It has more than 570 stores in Australia.
- 4.2. The company (including related entities) has become a world-leading supermarket operator since it was founded in 1913 in Germany as a family business.



- 4.3. The following is a snapshot of the history of the organisation⁹.

"In 1913, the business was founded in Essen by the Albrecht family. Brothers Karl and Theo Albrecht's entrepreneurial journey traces back to their mother, who opened a small grocery store in 1913 in a suburb of Essen. The brothers inherited their first store from her, a resilient establishment that survived the bombings during the war...The brothers officially founded the German grocery chain in 1946. With a vision to reduce waste and costs, the brothers established a no-frills model at their discount store. They sold only non-perishable goods at affordable prices from a small, nondescript shop...The Albrecht brothers were known for their frugality. They avoided spending money on advertising or in-store decorations and were ruthless in removing poor-selling items from their

⁹ <https://sustainability.aldisouthgroup.com/about-aldi/aldi-history> (see also <https://www.aldicareers.com.au/about-aldi/>)

inventory. By keeping prices lower than competitors, the discount store earned a strong following in post-World War II Germany, where the economy had been nearly destroyed...In early 1960, the brothers officially changed the name to Aldi, short for **AL**brecht **DI**scout, reflecting the business's commitment to providing affordable products. They also split the business into ALDI Nord [north] and ALDI Sud [south]...In 2001, ALDI opened its first Australian store in Sydney" through ALDI Sud.

- 4.4. ALDI stores offer a wide range of quality products including fresh food, packaged food, other consumables and various household, garden, leisure and personal items. At most stores, liquor is also available.
- 4.5. Modern ALDI supermarkets contain around 1,350 core product lines, which is significantly less than many other supermarket operators. There are limited brand options within each different product line. For example, ALDI may offer only two or three different brands of plain flour, rather than five or more as is commonly stocked at most other supermarkets. This enables ALDI to operate from a smaller and more user-friendly footprint and with a more exclusive and carefully selected range. It also facilitates a simpler and more convenient shopping exercise for consumers¹⁰.
- 4.6. "At ALDI, we believe in making a Good Difference. As a major Aussie retailer, we are mindful of our responsibility to the environment and the communities – those who live and work in our beautiful big backyard....Our sustainability initiatives are guided by four areas of focus: Good Planet, Good Community, Good Health and Good Business¹¹...ALDI is passionate about doing Good Business. From Aussie farmers who grow our produce to the employees who stock our shelves, we're committed to supporting our partnerships. We do this through responsible practices that foster strong and honest relationships with our business partners, buyers and team members. Good Business encompasses our efforts in supply chain management, the responsible sourcing of products and more¹²...We're not like other supermarkets. We do things differently to give you the lowest possible prices on the best quality products¹³."
- 4.7. ALDI's published mission is to provide the public with exceptional product value in terms of quality for price. This is achieved through a highly sophisticated business model involving a very focused selection of products and advanced levels of systemisation and organisation designed for optimum efficiency and product control. ALDI is dedicated to maintaining consistency in its philosophy of incredibly high quality at impossibly low prices.

¹⁰ For example: <https://www.macrobusiness.com.au/2021/03/the-rise-and-rise-of-aldi/> - "In addition to its competitive prices and good product quality, I like the simplicity of Aldi. Having a small footprint and limited product choice makes shopping quick and easy. Products are always in the same spot irrespective of store, making them easy to find. By contrast, I find Woolworths and Coles too large and confusing, and I often waste time wandering aisles trying to find what I need."

¹¹ <https://www.aldi.com.au/sustainability> and

¹² <https://www.aldi.com.au/sustainability/good-business>

¹³ <https://www.aldi.com.au/what-makes-us-good-different>

- 4.8. Most of ALDI's products are exclusive to ALDI. They are often versions of mainstream big-brand name items which are manufactured according to ALDI's particular and strict specifications to ensure quality and value-for-money. Expressi Coffee is one of the most popular non-liquor examples. The Expressi Coffee capsule machine and coffee capsules have won numerous awards.
- 4.9. The majority of ALDI's exclusive products that are available in Australia are sourced from Australian suppliers.
- 4.10. Every Wednesday and Saturday "special buys" are promoted by ALDI which are specialty short-term product lines that are usually non grocery items. Flat screen televisions, furniture, clothing, appliances, BBQs, tools, gardening equipment, vacuums, camping gear and toys are just some examples. These have proven extremely popular such that customers often queue outside a store to try to access these items and then spend long periods browsing. ALDI special buys are sometimes even reported by the media as news¹⁴.
- 4.11. Some special buys are repeated occasionally but most are one-off items in limited stock so when a store sells out, the item won't be replenished.



- 4.12. ALDI special buys are displayed in the now renowned middle aisle of every store. The following images show, by way of example, recent catalogue-advertised special buys.



¹⁴ For example, Chanel 7: "ALDI Australia set to bring back its wildly popular snow gear sale after two-year hiatus", 9 May 2023 (<https://7news.com.au/lifestyle/aldi/aldi-australia-set-to-bring-back-its-wildly-popular-snow-gear-sale-after-shock-hiatus-c-10571950>)

The zoomies

\$9.99

Quick fit harness with buckle fastening

\$14.99

Quick fit harness with buckle fastening

\$14.99

\$11.99

\$7.99

\$5.99

\$4.99

\$19.99

\$4.99

On Sale Wednesday 3 September

Prime grime time

\$279

ECOVACS DEEBOT

1 Year Warranty

Automatic charging

Dual function: vacuum or mop

App controlled

\$149

1 Year Warranty

Compact and lightweight

Cold, hot and steam functions

\$14.99

3 Year Warranty

Magnetic design allows you to clean both sides of the glass at the same time

\$249

2 Year Warranty

3 modes: auto, max and suction

Map and vacuum in one

tineco

\$99.99

1 Year Warranty

3 Year Warranty

Converts into handheld vacuum

\$29.99

Dual functions: wash or dry

Cleans hard-to-reach places

\$6.99

Storage box included

A ECOVACS DEEBOT NEO 2.0 Robot Vacuum Cleaner \$279 • Carpet detection • "TrueMapping" technology • App controlled • Approx. 180 minutes runtime • 4000Pa suction power • 4.0L dustbin • 4.2L water tank • Senses

B Tineco GO HD2 Sense Floor Masher \$249 • Hard floor cleaner • Vacuum and clean wet and dry messes simultaneously • Cordless • Charging dock • Self-cleaning and centrifugal air drying • LED display and brushes motor • Noise alert and smart sensor • 1800W

C Carpet Vacuum Cleaner \$99.99 • Easy to empty, 2.5L dirty water tank • Stop and release foot pedal • 5m power cord • 66524

D 2-in-1 Cordless Stick Vacuum \$99.99 • Cyclone technology and washable HEPA filter • 2 operating speeds • Soft-touch, rubberised handle • Includes wall mountable bracket • 66529

E Carpet Spot Cleaner with Steam \$149 • 1.6L clean water tank and 1000ml dirty water tank • 2m hose • 66540

F Magnetic Window Cleaner \$14.99 • Designed to clean both sides of the glass at the same time • Suitable for glass 3.8mm thick • Equipped with a safety rope to prevent cleaner from falling • Set includes magnetic window cleaner, 4 pads, spare fixing buttons and spare rubber blades • Assorted colours • 66549

G Electric Scrubber Brush \$6.99 • Great for hard-to-clean areas • Interchangeable heads • 66522

H Compact Tornado Mop & Bucket \$29.99 • Compact and lightweight • Multi-compartment bucket for washing and drying mop head • 2 microfiber pads included • Suitable for use on tiles, laminate and wood • Assorted colours • 66547

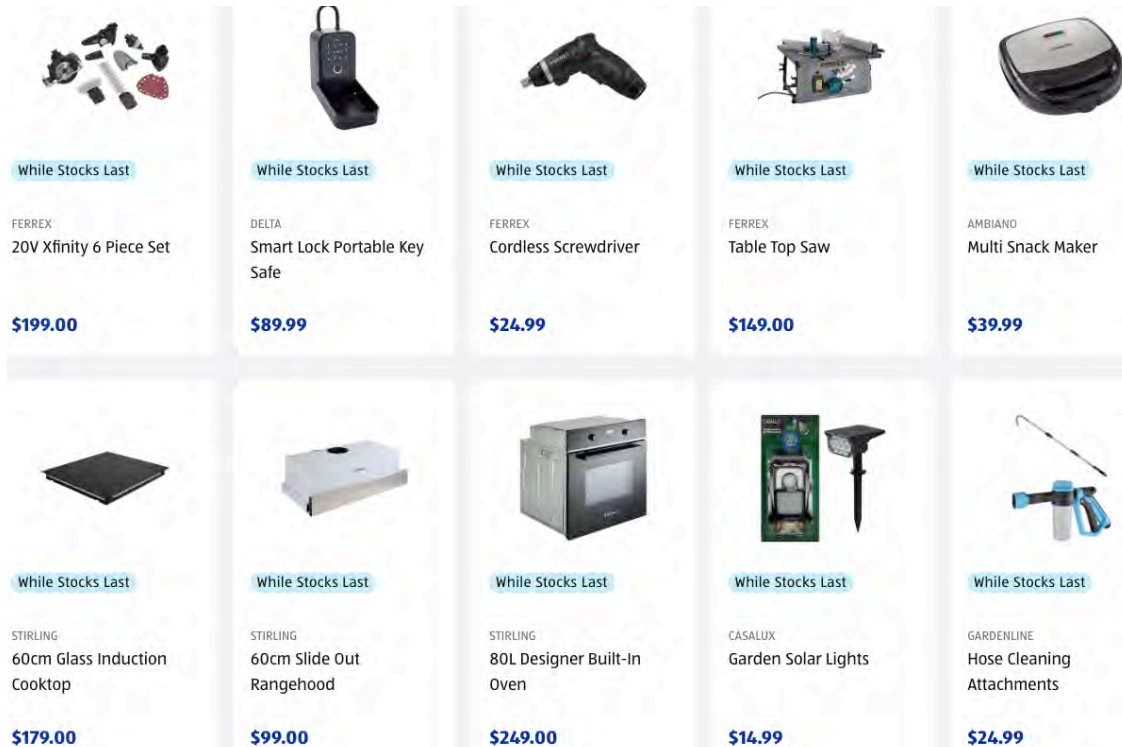
I Detail Cleaning Brush Set with Mop \$6.99 • Set includes deep clean brush, V-shaped corner edge brush with scraper, mini dustpan with scraper and soft detail brush with silicone scraper • Ideal for cleaning grout areas • Assorted colours • 66549

On Sale Saturday 6 September

Public Interest Assessment
 Form 2A Annexure
 Application for liquor store licence
 and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella


















4.13. The following are further examples:



4.14. The example images above show that an enormous and diverse range of popular consumer items are commonly available at exceptional value-for-money prices. Sometimes the special buys include a small selection of liquor. The following are examples of special buys of liquor available this year.

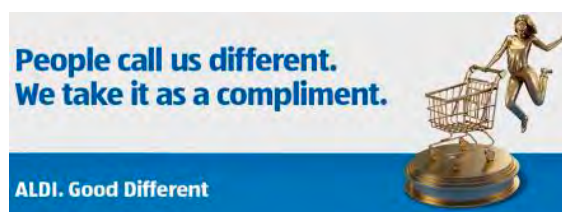
Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella

 ST HALLETT St Hallet Faith Barossa Shiraz 750ml \$14.99	 BROWN BROTHERS Winter Red 2024 Vintage \$9.99	 HIGHLAND GREEN Highland Green Blended Malt Scotch Whisky 700ml \$44.99	 WYNNS ESTATE Coonawarra Shiraz 2023 750ml \$11.99	 LES ARGELIERES Pinot Noir 750ml \$11.99
 MOUNT LANGI GHIRAN Shiraz 2023 Vintage \$15.99	 CORTE CARISTA Montepulciano D'Abruzzo DOCG 2021 Vintage \$11.99	 THE STANDING PEOPLE Lighter in Alcohol Pinot Noir 2024 Vintage \$9.99	 DUFFEY'S Irish Whiskey 700ml \$46.99	 RESCHKE Reschke Coonawarra Cabernet Sauvignon 20... \$11.99
 PIERRE CHAINIER Vin De Sud Pinot Noir 2024 \$9.99	 FAUSTINO Faustino Rivero Ulecia Reserva 750ml \$9.99	 FOWLES WINE Fowles Vinarium Chardonnay 750ml \$14.99	 FREYA AND JULES Clare Valley Shiraz 2022 750ml \$12.99	 BEST'S GREAT WESTERN EST 1866 Bests Grampains Cabernet Sauvignon... \$14.99

4.15. ALDI prides itself on consistently competitive pricing across all of its product lines and providing customers with exceptional value-for money. The company's ability to achieve such low prices for quality products stems from its highly sophisticated business model which focuses on operational efficiency. The following are but a few examples of aspects of ALDI's in-store operations which heighten productivity, reduce waste and enable competitive value-for money pricing to be maintained.

- 4.15.1. Trolleys can only be accessed by inserting a gold coin into a particular trolley in order to be able to use it. This encourages customers to return the trolley to retrieve their coin and avoid the need for staff to spend time collecting trolleys.
- 4.15.2. Products in ALDI stores are displayed on re-usable crates, designed specifically for ALDI. The crates fit systematically in the ALDI

- Jandakot warehouse, delivery trucks and stores and can be moved from one place to another without unloading or extra-handling.
- 4.15.3. ALDI products are packaged with multiple barcodes for quick and easy scanning at the checkout with little to no time wasted fumbling to find a barcode and scan the product.
- 4.15.4. Customers are required to pack their own shopping bags at the checkout and a dedicated packing area is provided for customers. Checkout staff do not use valuable time packing bags and checkout processing is kept moving as there are no interruptions with customers holding-up the procession whilst packing at the checkout.
- 4.16. ALDI's business is highly systemised and disciplined. ALDI's shelving, storage methods, displays, product placement and other logistical aspects are designed to coordinate with each other to achieve optimum operational efficiencies. As a result, ALDI is able to reduce operating costs and provide better services and facilities for its customers.
- 4.17. ALDI does not operate by the regular retailing method of rotating discounts each day or week. Rather, prices are maintained at a consistently low level. This means that customers know what to expect when shopping at an ALDI store. It also reduces costs and resources associated with the logistics of managing specials and sales promotions which involve external advertising on site, changing ticket prices, reconfiguring product placement, adjusting till systems and other processes. ALDI does not incur all of these costs, thereby enhancing its operating efficiency.
- 4.18. Consistent pricing is also indicative of consistent quality. ALDI does not downgrade its products through heavy discounting. The applicant is driven by quality and consistency. In this regard in terms of liquor especially, ALDI's products very much represent value-for-money. High quality award winning liquor items are provided at prices accessible to most people.
- 4.19. ALDI's approach to business is neatly encapsulated in its "Good Different" slogan, which was launched in 2017. Mr Thomas Daunt, then director of the applicant company, explained this campaign as follows.
- "ALDI Australia is unapologetically different – and that's a good thing for shoppers. We are proud of our differences and we stand by them wholeheartedly, as they are what allows us to bring unbeatable value to our customers, maintain strong relationships with our suppliers and support our staff every day."¹⁵



¹⁵ <https://insidefmcg.com.au/2017/05/15/aldis-good-different-campaign/>

- 4.20. ALDI is a responsible and sophisticated corporate citizen and operates pursuant to very high standards and key performance indicators, which include the following published principles¹⁶.
- 4.20.1. Price Promise
 - 4.20.2. Aussie First Policy
 - 4.20.3. Sustainability (- Good Planet, Good Community, Good Health and Good Business)
- 4.21. ALDI is a trusted brand in Australia amongst consumers. Reputable firm, Roy Morgan, has assessed ALDI as having had a strong performance, far ahead of most other supermarkets¹⁷.
- 4.22. ALDI's pursuit of excellence and quality in all things is evident in the many awards it has won in Australia, including Canstar Blue Most Satisfied Shoppers – Supermarkets 2014-2016 and 2018-2023 and Roy Morgan Supermarket of the Year for the last eight consecutive years¹⁸. Upon winning Supermarket of the Year in 2023, "Roy Morgan's research found Aldi's average customer satisfaction score was 95.7 per cent based on face-to-face customer interactions at supermarkets"¹⁹.
- 4.23. More specifically, ALDI is also an award-winning retail liquor supplier. Among its many liquor retailing awards has been the Canstar Blue Most Satisfied Customers – Liquor Retailer 2021 and Roy Morgan Liquor Store of the Year in 2018 based on customer satisfaction.
- 4.24. Canstar Blue is a major, renowned national independent reviewer and reporter of consumer products and services "helping Australian consumers make better-informed purchase decisions on products and services by providing factual, up-to-date and well-researched comparison tables, ratings, reviews, guides and news on a range of consumer-related topics...Canstar Blue uses its wealth of consumer and expert research and data to identify outstanding brands, products, services and plans. We award these brands, products, services and plans with an award that recognises this achievement"²⁰.
- 4.25. There should be no question as to the credibility of these awards and certainly no doubt that ALDI customers are immensely satisfied with the products and services provided by ALDI which include liquor.
- 4.26. The Australian Liquor Stores Association has said that Australian "shoppers have migrated towards the value messaging of Aldi"²¹.

¹⁶ <https://www.aldi.com.au/what-makes-us-good-different>

¹⁷ <https://www.roymorgan.com/findings/9666-risk-monitor-quartely-update-june-2024>

¹⁸ <https://www.roymorgan.com/findings/roy-morgan-unveils-annual-customer-satisfaction-award-winners-across-all-categories-2023>

¹⁹ <https://www.news.com.au/finance/business/retail/aldi-named-supermarket-of-the-year-in-roy-morgans-customer-satisfaction-awards-for-fourth-year-in-a-row/news-story/66f907a7efa9941ae6fc2610bc93c65f>

²⁰ <https://www.canstarblue.com.au/about-us/>

²¹ ALSA – IRI State of the Industry Report, March 2017 at page 14 - copy available if required, upon request

- 4.27. "Our success is based on the close relationships we have with our suppliers, who all share our passion for awesome quality. Aldi partners with some of the best producers and winemakers both in Australia and internationally, which means we can deliver exceptional quality, value and consistency to our customers. Our partnerships with our suppliers are focused on a desire to see the customer win with great-tasting wines at unbeatable prices".²²
- 4.28. ALDI is a highly sophisticated and experienced packaged liquor operator, which enjoys extensive supermarket and liquor retailing experience within Western Australia, elsewhere in Australia and overseas.
- 4.29. ALDI has been operating in Australia since 2001 when the first ALDI store opened in Sydney. There are now nearly 600 stores throughout Australia, including 52 in WA. The large majority of ALDI's stores throughout the country include a liquor component. In WA there are 36 ALDI stores trading with a liquor section.
- 4.30. Over the last ten years approximately, ALDI has been undergoing a \$700 million expansion, most notably in WA and South Australia. ALDI opened its first four stores in Western Australia on 8 June 2016.
- 4.31. The ALDI liquor service was made available in WA from the end of August 2017 in five ALDI stores initially. Since then, the applicant has had an excellent compliance record across the stores now trading in WA with ALDI's specialty trademark liquor section.

5. The liquor – ALDI exclusive products

- 5.1. The ALDI range of liquor products comprises a selection of wines, beers, spirits, ciders and liqueurs. The in-store range at Wonthella will contain a carefully selected value-for-money variety of approximately 95 items, many of which are award-winning and the large majority is produced for and available exclusively at ALDI.
- 5.2. Attached is a stocklist, which varies from time to time. The stocklist identifies the items that are available exclusively at ALDI. Notwithstanding that the stocklist is smaller than most liquor outlets, it contains a wide and well-balanced variety.
- 5.3. The range changes from time to time as it adapts to new products that become available to ALDI, responds to customer requirements and when occasional specialty items are offered. Generally, the ALDI liquor service at Wonthella would include the following:
- 5.3.1. Around 60 different wines – red, white, sparkling and fortified.
 - 5.3.2. Around 15 different beers – full, medium and light strength.
 - 5.3.3. Around 15 different spirits – bourbon, brandy, gin, scotch, vodka and liqueurs.

²² Jason Bowyer, ALDI Australia's Buying Director, in response to winning the Roy Morgan Liquor Store of the Year in 2018: <https://theshout.com.au/national-liquor-news/aldi-wins-roy-morgan-liquor-store-of-the-year/>

- 5.3.4. Around 5 different ciders.
- 5.4. The applicant's product range includes Western Australian produced wines. ALDI has partnered with various wine makers from the Margaret River region to develop a selection of exclusive ALDI Margaret River region products.
- 5.5. "The driver behind ALDI's [liquor] success is Jason Bowyer who has spent most of his life in the wine trade... ALDI's formula is to deliver quality and value at prices that often make the competition wince... Jason travels the world to find wine makers he can establish long term relationships with"...including Western Australian wine makers.²³
- 5.6. In recognition of the launch of the ALDI liquor service in WA, renowned wine expert Ray Jordan was invited to sample six of the wines in ALDI's WA stores. Mr Jordan produced a media article on his tasting and remarked that one of the wines in particular, being a \$7 bottle of One Road South Australian Heathcote Shiraz 2015, was "damn good"²⁴. That Shiraz has also won several other awards, including Double Gold & Best Value Shiraz of the Year at the 2017 Melbourne International Wine Competition. This Shiraz is just one example of ALDI's many high quality, value-for-money, award winning liquor products.
- 5.7. A large number of accolades have been bestowed on ALDI for its exclusive liquor range. Attached is a list of some of the awards received. The following are just two of the numerous published reports attributed to ALDI's superior quality, award-winning products:

A bargain [ALDI](#) vodka has taken home the top award at The Spirits Business Global Vodka Masters for 2022.

The supermarket's Tamova Quadruple Distilled Vodka (700ml) retails for just \$30.99 and is made in Australia.

The affordable spirit was awarded the Master Medal by an independent panel of experts, who tasted more than 139 vodkas from 75 companies around the world.

Melita Kiely, editor of The Spirits Business, said it the recent win was an "excellent achievement" for ALDI.

"To receive any sort of medal is something that every company should be extremely pleased with, and for ALDI Australia to receive a Master medal, the highest medal we award, for their single entry within a very competitive selection is an excellent achievement," she said.

"The multi award-winning vodka, part of ALDI's everyday range, is four times distilled and traditionally filtered for exceptional purity and a clean, crisp natural flavour."

25

²³<https://www.bestwinesunder20.com.au/jason-bowyer-aldis-wine-whisperer/>

²⁴ <http://www.perthnow.com.au/news/western-australia/aldi-will-start-selling-alcohol-in-perth-stores-from-today/news-story/c59014afc215ba475dd1265a0e89eb4c>

²⁵ <https://7news.com.au/lifestyle/food/bargain-30-aldi-vodka-picks-up-top-award-at-the-global-vodka-masters-2022-c-8149807>

Aldi is your one stop shop when it comes to amazing products at low prices. From the furniture sold in the Special Buys sale to the fresh produce on the shelves, Aldi is your go-to for all things groceries and homewares. However, the German retailer has another feather to add to its cap: seller of award-winning booze.

The 2019 International Wine and Spirits Awards were held recently, and Aldi took home 13 awards.

Earning an impressive score of 95 in the cask-inish single malt scotch whiskey category, the Glen Marnoch Single Malt Sherry Cask Scotch Whiskey, which retails for just \$43, took home the gold medal and is now recognized as one of the best scotch whiskeys in the world.

The whiskey is currently only available in Aldi stores throughout NSW, however, Aldi's Highland Earl 8 Year Old Scotch Whiskey, which retails at just \$34 and came in at second place, is available Australia-wide.

26

- 5.8. One of the most unique aspects of the ALDI liquor offering is the exclusive range itself, made-to-order for ALDI stores and not available at any other packaged liquor outlet. As stated previously, the majority of ALDI's range is unique and exclusive to ALDI. Shoppers simply cannot access those items at any other non-ALDI outlet. In this case, the nearest place for shoppers to access ALDI liquor products is in Yanchep, approximately 323km away.
- 5.9. In order to become an ALDI exclusive product, the producer enters into an arrangement with ALDI whereby it is agreed that particular brands of product will not be distributed or provided to any other retailer. This confirms that ALDI exclusive products cannot be obtained anywhere other than at an ALDI store.
- 5.10. The ALDI exclusive products differ significantly from the Woolworths and Coles private-label liquor ranges. Woolworths and Coles generally purchase the whole producer entity and production facility where possible and the products from those facilities then become what are known as private-label liquor items, effectively produced by/under the direction of Woolworths and Coles or their related entities. The issue with this approach, in terms of the proper development of the liquor industry, has been well explained by David Prestipino in his article 'Winestein Uncorked: 'Local' WA wines actually owned by Woolworths, Coles'²⁷ where he described the duopoly's approach as follows:

"To avoid certain wine taxes and further boost their huge profits, Woolworths and Coles create 'wine brands' (such as the Cow Bombie) under cheeky and creative (some say misleading) names.

The wines are difficult to identify, and often undercut well-known brands, small boutique and family wineries and those struggling to find a voice in an ever-increasing crowded market.

Instead of Coles Reserve Chardonnay or Woolworths Bin 666 Cabernet, you have brands like Chateau Louise (Coles) and

²⁶ <https://www.bhg.com.au/aldi-scotch-whiskey-award>

²⁷ <https://www.smh.com.au/entertainment/winestein-uncorked-local-wines-actually-owned-by-woolworths-coles-20151211-gllhjo.html>

Augustine Wines (Woolworths) for sale...wines that are actually owned by the supermarket giants themselves.

By Developing their own private-label and exclusive wines, Coles and Woolies are now competitors to the very wineries (and consumers) they are meant to serve.

Why should this worry wine drinkers? Because not only are we losing diversity and competition as the duopoly increases its share of the wine market, but the relationship hurts independent merchants across the country, who are forced to close.

If the big chains need to move a product because it is not selling, or want to replace it for their own means, they slash the wine's price, essentially lowering the winery's brand/reputation at the same time."

- 5.11. ALDI's approach is very different. ALDI does not own the wineries, breweries and distilleries that produce its exclusive products and therefore, those independent producers are capable of producing other liquor items under different branding to sell directly to consumers themselves, or to other packaged liquor retailers. Further, whilst those producers will be required to produce a product to ALDI's standards and specifications they will, nonetheless, give input and advice into developing the products as the independent wine, beer or spirit producing expert.
- 5.12. The ALDI model does not, therefore, have the same deleterious effect on the development of the liquor industry by removing independent liquor producers from the market, but rather ALDI makes a highly valuable contribution to the industry by providing independent producers with a channel to develop and sell their wares.
- 5.13. This is one of many factors which differentiate ALDI's liquor range from the major liquor stores. The Wonthella and surrounding community will benefit greatly from having access to this special service. The role of the shopping centre site will be enhanced with the increased product diversity to be generated by ALDI's liquor service.
- 5.14. Given that the majority of ALDI's liquor range comprises ALDI exclusive products, it means that, as stated previously, the ALDI offering, overall, is unique to ALDI and simply cannot be replicated by any other licensee. The overall offering includes ALDI's liquor services which also cannot be said to duplicate any existing operation in Wonthella or up to approximately 323km nearby.
- 5.15. Within the liquor range available in any given week is a selection of new and different liquor items which change from week to week, similar to the "special buys" offer referred to elsewhere in this PIA. Approximately eight different products per week are made available to customers until the stocks are depleted and then new ones are brought in for customers, so the product selection remains fresh and vibrant.

- 5.16. ALDI's liquor range is determined following a rigorous process of elimination trialling and testing of products. Then, the items that are found to offer the very best value-for-money are selected, which necessitates identifying excellent quality. The optimum range is ultimately made available to customers. A quantity of products is stocked that is deliberately much smaller than may be found at most other liquor stores. The ALDI range is much more discerning and refined than most other packaged liquor outlets. This ensures modern consumer requirements are met whilst ALDI's principles of quality, value-for-money and great convenience are upheld.
- 5.17. An example of ALDI's liquor advertising published in a catalogue recently appears below. It is relatively modest, yet smart and stylish. The advertisement contains product information for each item, demonstrating the quality and value-for-money propositions regarding the ALDI range and the fact the range is indeed carefully selected and responsibly promoted.

Drops of wisdom

\$11.99
A

\$15.99
B

91 points

\$11.99
C

\$12.99
D

\$12.99
E

\$48.99
F

\$44.99
G

\$54.89
H

\$57.99
I

\$15.99
K

\$12.99
L

\$32.99
M

ALDI Liquor available in selected stores. See aldi.com.au for locations

A Cuvée de Noces
Cuvée de Noces 2022 750ml
A classic Cuvée de Noces blend. Stunning
Sauternes Berry Reserve with apricot, raspberry
and blackberry, with some ageing in
rosemary, lavender and dried figs.

B Brachet Cuvée de Noces
Cuvée de Noces 2022 750ml
A rich and elegant blend of
grapes from the Cuvée de Noces
vineyard. Stunning value
at just \$11.99.

C Passet Langi Ciliacan Pepper Series
Cool Climate Shiraz 2022 750ml
Lowly red berry and plummy fruit
combine to create a powerful and
distinctive blend. The perfect
accompaniment to a variety of
meats. Available every day.

D La Male Cuvée de Noces
Cuvée de Noces 2022 750ml
A rich and elegant blend of
grapes from the Cuvée de Noces
vineyard. Stunning value
at just \$11.99.

E Galway Pipe 12yo
Tawny 750ml
Aged in oak barrels for
an average of 12 years,
this exquisite, rich blend
has a complex flavour
profile of raisins, dried
pears, grilled nutmeg and
spicy oak. Perfectly
crafted, aged and
ready to drink.

F Freya and Jules
Clare Valley
Shiraz 2022 750ml
New to the Freya and Jules
range. A vibrant wine
displaying blue and black
fruit aromas, with hints of
black pepper and plum.

G Hickson House
Oyster Shell Gin
700ml
Award-winning classic dry gin
infused with seaweed,
Larragon native finger lime, rube grapefruit and
crushed Sydney Rock Oyster shells. A smooth, creamy
texture with a delicate hint of ocean salinity.

H Chivas Regal 12yo
Scotch Whisky 700ml
Chivas Regal 12yo has distinctive Speyside flavour of
crisp orchard fruits, wild heather and sweet honey.
This signature, blended Scotch whisky has a rich and
generous taste that's synonymous with its house style –
primarily, it's an undeniably smooth whisky.

I Southern Comfort Black 700ml
Smooth taste. Bold character. Southern Comfort Black
brings unmistakable whiskey flavour, with its signature
touch of stone fruit and spices. It doesn't follow all the
whiskey rules – just always leads to a good time.
Enjoy it straight up, on the rocks or to reward your
favourite classic whiskey cocktail.

J That Spirited Lot
Triple Citrus Vodka 700ml
Featuring Japanese yuzu, mandarin and lemon. This
vodka packs a zesty punch! Serve simply with soda and
a slice of lemon or use it to give your favourite cocktail a
citrus kick.

K Byron Bay Premium Lager 6 x 355ml
A balance between hop and malt. Brewed with all pale
malts for a light gold colour that delivers a smooth and
refreshing taste.

L Southern Comfort Black 700ml
Smooth taste. Bold character. Southern Comfort Black
brings unmistakable whiskey flavour, with its signature
touch of stone fruit and spices. It doesn't follow all the
whiskey rules – just always leads to a good time.
Enjoy it straight up, on the rocks or to reward your
favourite classic whiskey cocktail.

M Galway Pipe 12yo
Tawny 750ml
Aged in oak barrels for
an average of 12 years,
this exquisite, rich blend
has a complex flavour
profile of raisins, dried
pears, grilled nutmeg and
spicy oak. Perfectly
crafted, aged and
ready to drink.

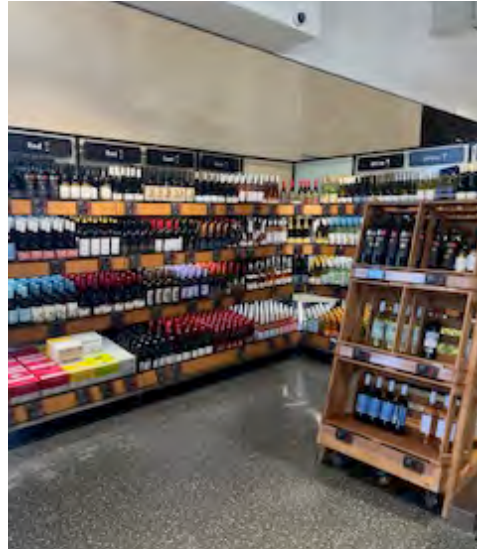
On Sale Wednesday 20 August

6. Form 2A “Part 2 – Manner of trade”

Form 2A “2.1 What is the proposed manner of trade and your target client base?”

- 6.1. This application involves a proposal to sell and supply packaged liquor on and from the premises proposed to be licensed as described above, in accordance with section 47 of the Act.

6.2. As previously outlined in this document, the applicant proposes to offer a relatively small and mostly exclusive selection of carefully selected, value-for-money non-refrigerated beer, wine and spirits (including a range of beer, wine and spirit varietals, cider and sparkling). The images to the right and below depict a typical ALDI liquor section which will be established in Wonthella if the licence is granted.



6.3. The low-level free-standing temporary displays, as depicted in the following image, may be placed in different positions within the small liquor block.



- 6.4. The applicant seeks approval for the same licence, in respect of the same business model and on the same terms and conditions as approved on 38 previous occasions in WA.
- 6.5. ALDI Wonthella currently operates as follows (with variations for public holidays):
- Monday: 8.30am to 8.00pm
 - Tuesday: 8.30am to 8.00pm
 - Wednesday: 8.30am to 8.00pm
 - Thursday: 8.30am to 9.00pm
 - Friday: 8.30am to 8.00pm
 - Saturday: 8.30am to 5.00pm
 - Sunday: 11.00am to 5.00pm
- 6.6. The liquor service will operate within these time periods, but subject to trading hours permitted under section 98D the Act and as may be approved under section 60(4)(g).
- 6.7. The applicant seeks approval for the standard trading hours permitted under section 98D of the Act, namely 8am to 10pm Monday to Saturday and 12 noon to 10pm on ANZAC Day (except no trading on Good Friday or Christmas Day). The applicant also seeks approval pursuant to section 60(4)(g) of the Act for an ETP to authorise trading from 10am to 10pm on Sunday. However, the actual opening times of the liquor section are proposed to be the usual ALDI store trading hours, as stated above (except no liquor trading before 12 noon on ANZAC Day or any time on Good Friday or Christmas Day). When the ALDI supermarket is not trading, the liquor display/browse area would be closed off to customers and if the ALDI store is open for trade at times not permitted under section 98D or 60(4)(g) of the Act, the liquor area will also be closed to the public. Therefore, overall, ALDI's proposed liquor trading hours are much less than potentially permitted under the Act and much less than most liquor stores.
- 6.8. The applicant invites the licensing authority, if it considers appropriate, to impose the following special trading conditions that are imposed on ALDI's existing licences in WA:
- 6.8.1. The licensee is prohibited from selling refrigerated liquor products.
 - 6.8.2. There is to be no external advertising of liquor products on the façade of the licensed premises.
 - 6.8.3. The browse/display area is to be closed off when not open for trade.
 - 6.8.4. The licensee is to have and maintain a CCTV system in accordance with the policies of the Director of Liquor Licensing.
 - 6.8.5. The liquor display and sale area must be separated from the food/grocery display and sale area by barricading of non-see-through material over two (2) metres in height.

- 6.8.6. The entry/exit point to the licensed area must have a gate.
- 6.9. There are many aspects to the ALDI liquor model which differ from virtually all other non-ALDI packaged liquor outlets anywhere and which are most certainly totally different from the existing outlets relevant in this case. The following are key unique aspects of the ALDI liquor model, which will apply at Wonthella, should the application be approved:
- 6.9.1. ALDI exclusive product range.
 - 6.9.2. Combination of the ALDI liquor service with the ALDI non-liquor store elements. A one-stop-ALDI shopping convenience.
 - 6.9.3. One transaction convenience.
 - 6.9.4. Its small size and location under the supermarket roof.
 - 6.9.5. Small, carefully curated selection of liquor with no bulk displays.
 - 6.9.6. Absence of refrigeration.
 - 6.9.7. Absence of external presence of the liquor section.
 - 6.9.8. The particular level of surveillance of the display/browse area which can be seen and monitored by staff at all times in its entirety.
 - 6.9.9. Restricted visibility into the liquor section as a juvenile risk management feature.
 - 6.9.10. Combined beneficial effects of the features listed above which are supplemented by the overall manner of trade and harm minimisation features identified.
- 6.10. In regard to the “target client base” referred to in the Form 2A:
- 6.10.1. Principally, the ALDI target client base for the proposed liquor service is existing customers of the ALDI Wonthella store who are demanding that ALDI liquor be made available to them there, of which there are an average of over 8,000 per week²⁸. The next nearest ALDI liquor service is in Yanchep, approximately 323km away (straight line).
 - 6.10.2. The target client base also comprises other people in and around Wonthella including those driving past along the North West Coastal Highway through the region. Tens of thousands of vehicles travel past the ALDI Wonthella store on average every day²⁹. North West Coastal Highway, upon which the ALDI Wonthella store is situated, is a “Primary Distributor” in the Main Roads WA hierarchy and a State Road³⁰ of approximately 1,320km in length, distributing traffic through

²⁸ PRG report at page 5

²⁹ at the nearest published traffic recording points on North West Coastal Highway at west of Geraldton Mount Magnet Road and north of Second Street at pages 49 and 50: Statewide Main Roads Western Australia Traffic Digest 2020/21-2025/26 (copy available if required, upon request)

³⁰ <https://portal-mainroads.opendata.arcgis.com/datasets/mainroads::road-hierarchy/explore?location=-28.776875%2C114.626784%2C17.91>

the Mid-West and Pilbara regions. These classifications mean that, among other things, North West Coastal Highway has a high degree of connectivity, connects with other primary distributors and has a “predominant purpose...for movement of inter regional and/or cross town/city traffic”³¹. Further, it is a “principle/major route for high volume traffic movements within large urban areas”³².

- 6.11. ALDI operates a friendly, inclusive and welcoming store and will continue to do so if the licence is granted. Any adult may potentially visit the liquor section and shop there provided only that they comply with ALDI's conditions of entry that apply to anyone and any legal requirements by which ALDI needs to abide.
- 6.12. ALDI enjoys enormously favourable community sentiment and support. Its stores have huge popularity and significant regular custom. Some customers are so passionate about ALDI that they developed their own private Facebook page/group named, Aldi Fans Australia, dedicated to information for ALDI lovers. This is not an official ALDI media source and yet it has approximately 105,000 members³³. ALDI's official Facebook page has nearly 900,000 “followers”³⁴. This medium is the modern-day voice of the public and therefore, represents significant community sentiment.
- 6.13. The first two ALDI applications for liquor store licences in WA were initially refused at first instance³⁵ (and subsequently approved). Soon after the initial refusals, a massive 8,637 people took it upon themselves to participate in an Internet survey conducted by Nine News Perth³⁶ which asked: “Do you think ALDI should be banned from selling alcohol because it's too cheap?”. Within just two days 7,428 people who participated (86%) answered “no”. Importantly, this survey was conducted without any involvement from the applicant. It was completely unsolicited. It is indicative of ALDI's significant popularity in the WA community.
- 6.14. ALDI has been under pressure for some while from local residents to provide a liquor service at the Wonthella store. They know about other ALDI stores offering liquor and want Wonthella to do the same. Customers seeking the liquor service have expressed confusion and frustration as to why other ALDI locations offer liquor but the Wonthella store does not.
- 6.15. The applicant engaged independent expert market research firm, PRG³⁷, to conduct a survey and to subsequently provide a report of the results which is referred to throughout this document. Some of the results in the PRG report evidencing clear and strong demand for the ALDI liquor proposal from the 303 people surveyed, include the following:

³¹ Main Roads WA Road Hierarchy for WA Road Types and Criteria (copy available if required, upon request)

³² Section 13(2)(e) and (3)(d) of the Main Roads Act 1930

³³ <https://www.facebook.com/groups/117155111252/>

³⁴ <https://www.facebook.com/ALDI.Australia/>

³⁵ Decision of Director of Liquor Licensing: ALDI Harrisdale (A000187300) and Decision of Director of Liquor Licensing: ALDI Joondalup (A000191943)

³⁶ 9 News Perth Facebook, 15 June 2016, printout attached

³⁷ Experience, expertise and methods are referred to on pages 2, 5 and 11; Also: <https://marketresearch.com.au/>

- 6.15.1. “Seventy-six per cent of all shoppers, and 87% of packaged liquor buyers support the establishment of a liquor section within the Wonthella ALDI store”³⁸.
- 6.15.2. “A significant majority of respondents indicated that the key liquor store attributes that would be provided in an ALDI Liquor section appealed to them. The fact that 82% of shoppers had shopped in an ALDI store that included a liquor section, adds some weight to these observations.”³⁹
- 6.15.3. “Well in excess of 9 in 10 “experienced shoppers” agree...that:
- ALDI liquor sections have good quality products,
 - the products represent good value for money,
 - the liquor section is convenient for shoppers. (sic) and
 - 85% agree that they have many brands and products not available elsewhere (other than another ALDI store)”⁴⁰
- 6.15.4. “[A]lmost 9 in 10 shoppers (85%) like the notion that the liquor section would be located within the Wonthella ALDI store.”⁴¹
- 6.15.5. 62% of packaged liquor buyers in the PRG report and of those, 84% who have consumed ALDI liquor products purchased from a WA ALDI store, said in the consumer survey that they like the specialist ALDI liquor range proposed for the Wonthella store⁴². PRG concluded that “[i]t is clear that the weight of opinion is very much supportive of this aspect of the proposed Wonthella ALDI liquor section”⁴³.
- 6.15.6. “Almost 8 in 10 (77%) of the total ALDI shopper sample liked [the value for money pricing] aspect of the proposed Wonthella ALDI liquor section... elevated [to] 86% and 97% respectively of packaged liquor buyers, and those who have consumed ALDI liquor products purchased from a WA ALDI store....the weight of sentiment is very much in support of this aspect of the proposed ALDI liquor section”.⁴⁴
- 6.15.7. “More than 8 in 10 (83%) of the total Wonthella ALDI shopper sample liked [the one-stop shopping convenience] aspect of the proposed liquor section... There is an elevated 91% and 98% respectively of packaged liquor buyers and those who have consumed ALDI liquor products purchased from a WA ALDI store”.⁴⁵

³⁸ PRG report at para 2.2 on page 7

³⁹ PRG report at para 2.3, page 9

⁴⁰ PRG report at para 4.4.2, page 19

⁴¹ PRG report at para 4.5.1, page 20

⁴² PRG report at para 4.5.2, page 21

⁴³ PRG report at para 4.5.2, page 21

⁴⁴ PRG report at para 4.5.4, page 23

⁴⁵ PRG report at para 4.5.5, page 24

6.16. The PRG report has been compiled by an extremely experienced expert. Such evidence was found by the Liquor Commission in *ALDI Foods Pty Ltd v Director of Liquor Licensing LC 09/2017 (ALDI Harrisdale)* to be “gold standard”⁴⁶.

Form 2A “2.2 Describe the premises/proposed premises”

6.17. ALDI stores generally comprise a total footprint of approximately 2,000m². Some are located within shopping centres while others, like the Wonthella store, are free-standing. This store – pictured on the cover page of this document – has been running for nearly seven years. It operates from within a modern, single storey building.

6.18. Consistent with other ALDI stores, the following different parts or areas comprise the Wonthella outlet, listed in order of size in terms of the approximate portion of the total footprint:

6.18.1. Main public retail area (non-liquor) – displaying grocery, other supermarket items, homewares, clothing, furniture, tools and other non-grocery items.

6.18.2. Storage.

6.18.3. Loading dock/delivery area.

6.18.4. Entrance and trolley bay.

6.18.5. Checkout.

6.18.6. Office and staff facilities.

6.18.7. Liquor display and browse area (proposed).

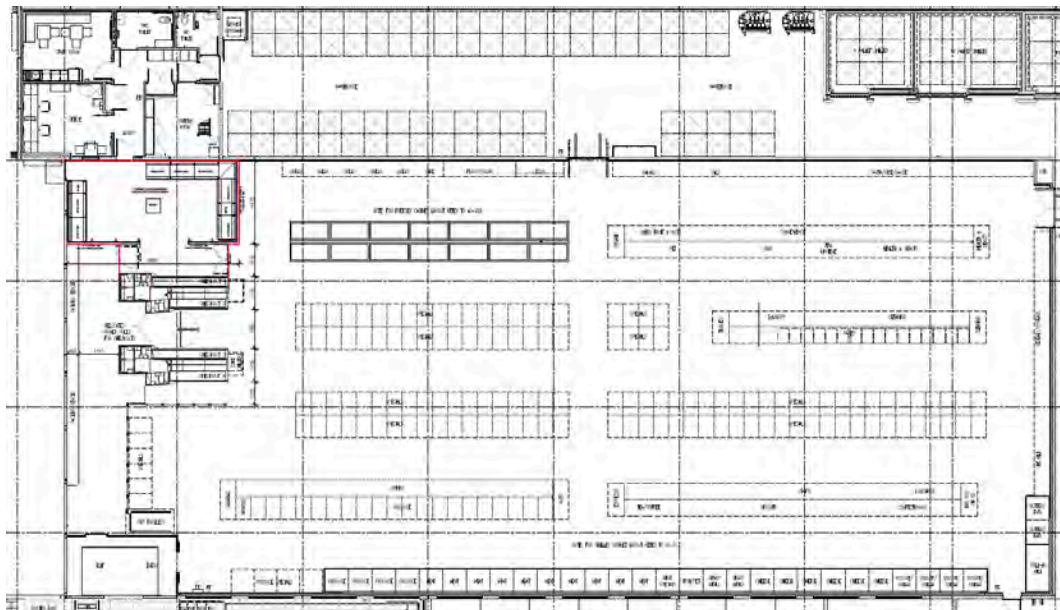
6.19. The store also has its a dedicated, spacious parking area at the front door, with nearly 100 bays.

6.20. ALDI stores are bright, fresh and pleasant shopping environments. The following images depict the stylish and crisp appearance that can be found at the ALDI Wonthella store:



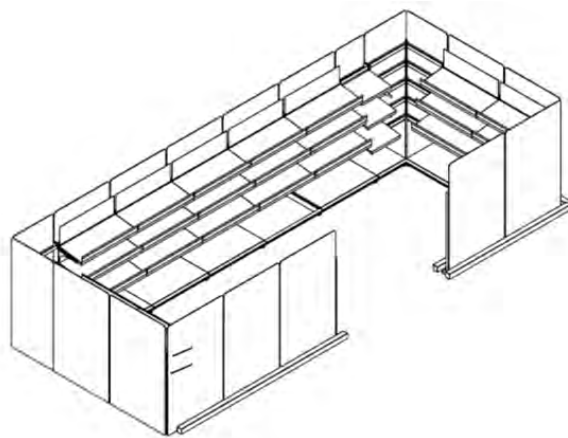
⁴⁶ Hearing 22 February 2017, transcript at page 45

- 6.21. ALDI operates a generic store modelling concept. The size, layout, colour, product location and stock range of each ALDI store are almost always the same. Minor differences may occur from time to time at some stores owing to land formation, town planning requirements or other unique particulars of the site. For example, the entrance door may be positioned a few metres away from its usual position at a particular location.
- 6.22. The standardisation of store layouts engenders familiarity for customers, enhances shopping comfort, efficiency and convenience. It also enables customers to rely on consistency of style, standard and overall offer. Importantly, these are key features of the applicant's successful superior efficiency model of operation which benefits customers enormously and is clearly popular with shoppers.
- 6.23. The layout of the ALDI Wonthella store is pictured below in an extract from the applicant's floor plan lodged with the application. It shows the proposed licensed area outlined in red, which includes both liquor display/browse and checkout, with a combined area of approximately 30m². This is clearly a tiny proportion of the overall footprint. The office is also sought to be licensed to house the required licensing documents and to accommodate the approved manager from time to time.



- 6.24. The display/browse space is a simple rectangular shape as depicted in the image above which will be clearly delineated in the same manner as existing ALDI licensed stores. This design is based on many years of experience and enables convenience and a high level of surveillance of the area. The display/browse area will also comfortably accommodate shoppers with their trolleys.

- 6.25. The checkout closest to the liquor display/browse area is proposed to be licensed for the purposes of the liquor transactions. Staff operating at this checkout will be able to monitor all patron activity in this area.
- 6.26. The very small size and layout of the liquor display/browse area clearly confirms that the liquor section is a complementary and ancillary service to the rest of the ALDI Wonthella store and will help ensure the area is well-controlled and supervised.
- 6.27. As set out earlier on in this document, the following aerial render is indicative of the proposed sectioned-off liquor display/browse area, which is to be established if approved. The boundary partitioning is intended to be made of 2.1 metre high opaque frosted glass designed for the purpose.



- 6.28. The following photograph of the approved liquor section at the ALDI Yanchep store, by way of example, which is the area behind the frosted glass and the checkout just in front of it, is indicative of what is proposed to be established at Wonthella:



- 6.29. The position, layout and small size of the liquor section will enable very clear and uninterrupted visibility and supervision of the display/browse area. These features assist with security, surveillance, management and control by staff.
- 6.30. Thoroughly trained and suitably qualified staff members over the age of 18 will be positioned at the licensed checkout at all times, where they will be able to see directly into the whole liquor area. Such constant and close surveillance is rarely achieved at most other liquor stores due to their size, layout and walk-in cool rooms. Further details of the applicant's well developed risk management measures, which include a heavy emphasis on staff training, are set out further on in this PIA.
- 6.31. The liquor area will be entirely confined well within the ALDI supermarket building and have no access directly into, or visibility from, outside of the ALDI store. In fact, the liquor section will have even limited visibility from within the ALDI supermarket. It will be positioned on the opposite side of the store from the main entrance, next to the office, so as to reduce visibility and enhance the separation from the rest of the store. The liquor section will be discretely tucked-away into the corner, as depicted below at the end of the far-end aisle.



- 6.32. Signage external to the licensed premises may be displayed which is subtle, modest and states simply that there is "liquor available in store". Such signage will not contain images of liquor products, references to particular liquor products or prices of liquor products. The following is an example of the innocuous type of external signage that may be displayed.

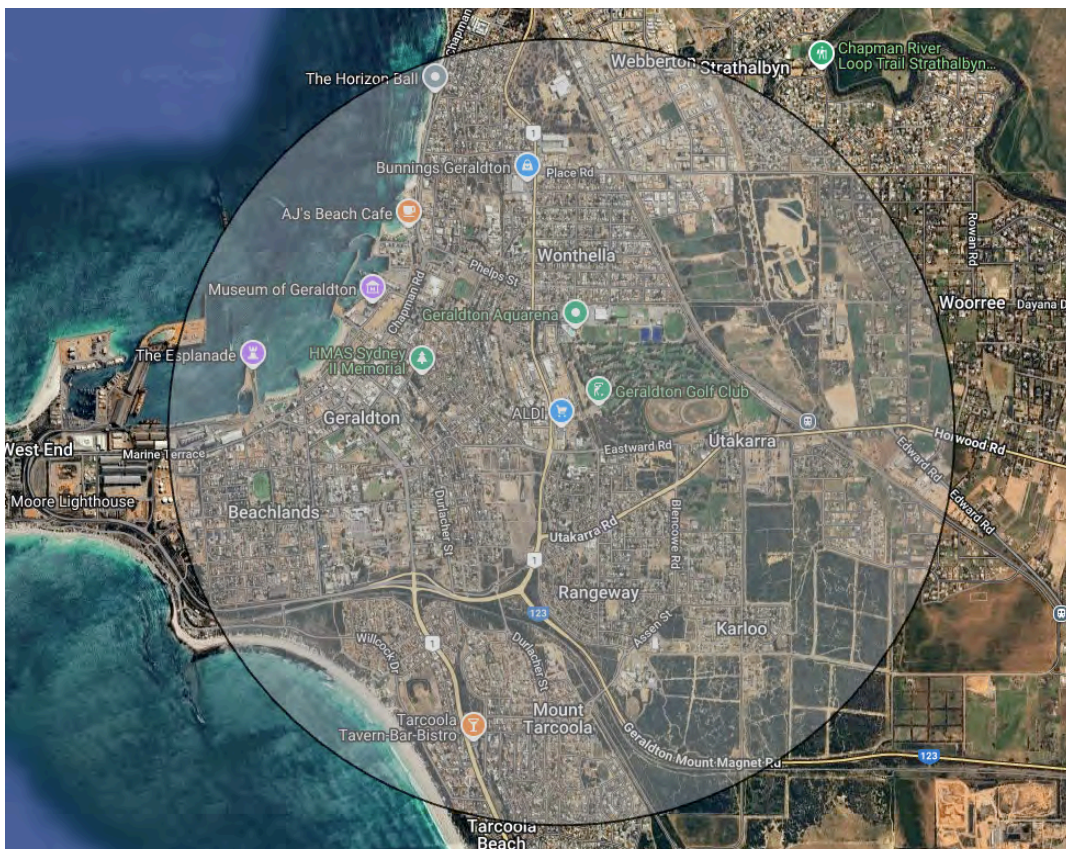
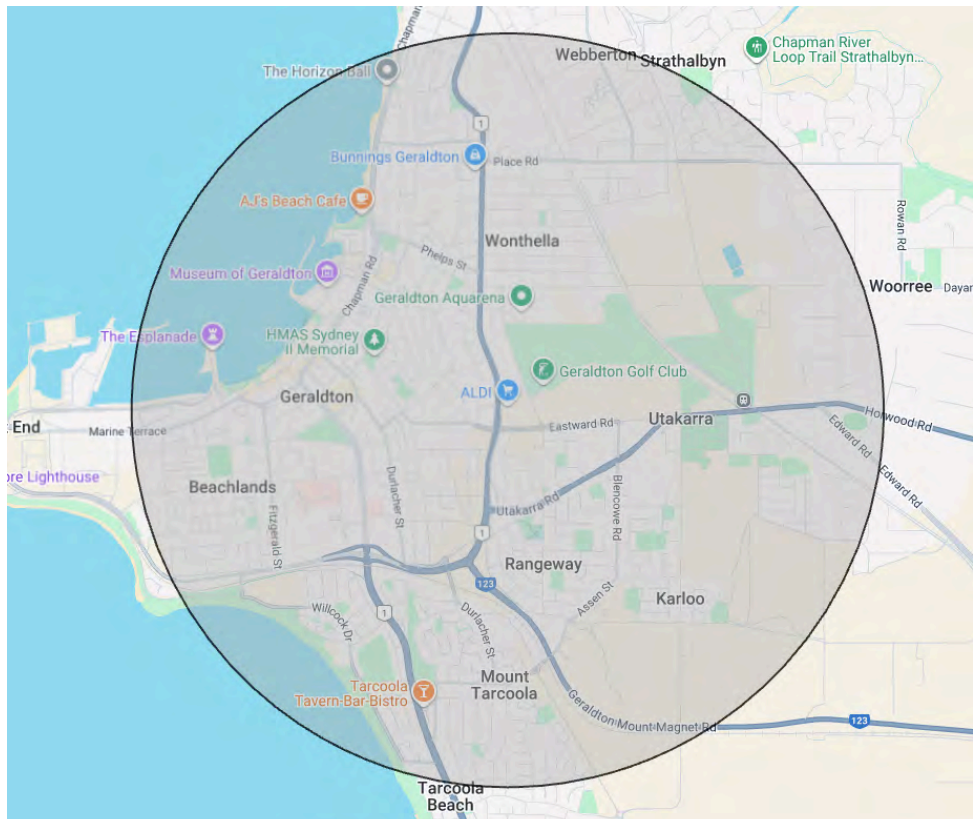


- 6.33. There will be no cool room or other refrigeration in the liquor area. All products will be stocked and sold at room temperature. This unique feature further confirms the intention that the liquor service is genuinely designed to complement the other household items being sold and provide a one-stop-ALDI shop, not an impulse buying service designed to accommodate quick drinking.
- 6.34. As stated previously, the office inside the ALDI Wonthella store is proposed to be licensed for the main purpose of storing licensing-related documents including the approved plans, harm minimisation plan, incident register and staff training register. From time to time, the approved manager may be positioned inside the office.
- 6.35. The applicant intends to store liquor in the back-of-house storage area of the ALDI Wonthella supermarket and also at the applicant's distribution centre in Jandakot. No sale or supply of the liquor directly to customers will take place from the storage facilities.

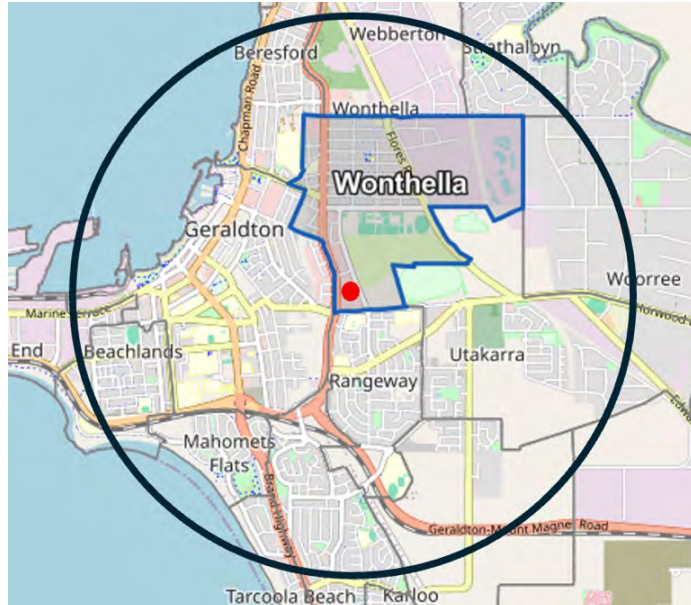
Form 2A: “2.3 If you intend to sell packaged liquor, give the names and addresses of all existing licensed premises within the locality”

- 6.36. To address this point in the Form 2A, it is necessary to firstly identify the relevant locality. There is no definition of “locality” in the Act.
- 6.37. The ALDI Wonthella store is located approximately 370km from the Perth CBD (north). In the Form 2A, the Department has suggested that the locality for this case may be a 3km radius around the proposed licensed area. That area is depicted in the Google Maps images below (**3km locality**).

Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella



6.38. The following Google Maps image shows the suburb of Wonthella outlined in blue⁴⁷ in the context of the 3km locality shown as the black radius. The central red dot indicates the approximate location of the ALDI Wonthella store:



6.39. The whole of the 3km locality is within the City of Greater Geraldton local government area, in the Mid West region of the State, approximately 420km north of Perth.

About GREATER GERALDTON

Located 419 kilometres north of Perth, Greater Geraldton is a thriving city with a population of over 40,000. The Midwest is recognised as having the most diversified economy in the state through industries including mining, fishing, aquaculture, agriculture, manufacturing, construction, retail and tourism. With the best of coastal and rural living and stunning weather year round, Greater Geraldton is a truly perfect place to visit and to make home. Geraldton's coastline is a huge tourist attraction and has beautiful foreshores to match. Other attractions include the iconic Point Moore Lighthouse, the HMAS *Sydney II* Memorial and the Houtman Abrolhos Islands which are located 80km off the coast of Geraldton. Greater Geraldton also incorporates the towns of Mullewa, Walkaway and Greenough. World renowned for water sports, Geraldton lends itself to some of the most spectacular kite surfing, windsurfing, fishing and diving conditions to be found anywhere.

48

Geraldton

In Geraldton, it's all about the lifestyle! It's what brings people to Geraldton and what makes them stay. Nestled along Western Australia's stunning Coral Coast, Geraldton offers a Mediterranean climate with mild winters averaging 20°C and warm summers peaking around 33°C - perfect for beach lovers and outdoor enthusiasts alike.

Whether you're into water sports, fishing, wildlife encounters with friendly sea lions, or simply soaking up the sun on world-class beaches, Geraldton's turquoise waters and white sands are a magnet for visitors from around the globe.

But the magic doesn't stop at the shoreline.

49

⁴⁷ <https://www.abs.gov.au/census/find-census-data/search-by-area>

⁴⁸ City of Greater Geraldton Annual Report 2023/2024 at page 4: <https://www.cgg.wa.gov.au/annual-reports.aspx> - copy available upon request if required

⁴⁹ <https://www.cgg.wa.gov.au/live/my-home/about-greater-geraldton.aspx>

6.40. “In Geraldton it is all about the lifestyle! It's what brings people to Geraldton and what makes them stay. With a beautiful Mediterranean climate, the sun shines almost all the time. In winter the temperature averages around 20C and 33C in summer. It makes for the perfect beach lifestyle and Geraldton's stunning coastline attracts people from all over the world. Whether it is water sports, a spot of fishing, saying hello to our friendly Sea Lions or just to relax – our beaches are world-class.

In addition to the spectacular turquoise water and white sandy beaches, Geraldton has a booming café and restaurant scene. Marine Terrace's West End has cemented itself as a go-to for locals and visitors alike with the popular strip featuring great coffee, food and retail. Not to mention Geraldton's array of cuisine and dining options which feature local produce.

Alongside Geraldton's many food choices are the retail options. With extended trading hours, Geraldton has a large range of shopping options from many local stores and boutique brands to larger nation-wide franchises.

While Geraldton is classed as a “regional city”, we have an amazing cosmopolitan lifestyle with an array of modern bars and nightlife to match.

You will never be short of anything to do with an ever-growing events and entertainment scene. With everything from live music, theatre, comedy, dance, Fringe Festivals, Geraldton is cementing itself as a leader in entertainment in WA. In addition, to add to that, our arts and culture scene has it all. From galleries, history, street art and a lot more!

Not just our beaches and stunning Foreshore, but we are home to the magnificent HMAS Sydney II Memorial, Western Australian Museum, the Saint Francis Xavier Cathedral, Seal Rock, live lobster factory, the Point Moore Lighthouse and the phenomenal Houtman Abrolhos Islands located just off the Geraldton coast.

A total of 122 islands make up the pristine Houtman Abrolhos Islands located just 60km off the Geraldton coast. They are accessible via aircraft and boat. Diving, fishing, snorkelling, photography and bird watching - the Abrolhos Islands are truly spectacular.

We are also a central hub for people to explore the attractions of the wider Midwest region including the Mullewa Wildflowers, the amazing Kalbarri Gorges and Skywalk, the Pink Lakes and the array of beaches up and down the coast.

Many base themselves in Geraldton to explore the wonders of the Coral Coast, as we know – there's so much to discover!”⁵⁰

6.41. The suburb make-up of the 3km locality may be described by the following table which lists all or parts of the suburbs that fall within the 3km locality.

⁵⁰ <https://www.visitgeraldton.com.au/about.aspx>

Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella

Suburb	Estimated % of the developed and populated part of the suburb that falls within the 3km locality	Estimate % of the 3km locality that is covered by the suburb area
Wonthella	100%	12%
Geraldton	100%	12%
Rangeway	100%	8%
Mahomets Flats	100%	5%
Karlooloo	99%	10%
Beachlands	99%	5%
Beresford	95%	7%
Mount Tarcoola	90%	7%
Utakarra	80%	12%
Webborton	55%	8%
Strathalbyn	40%	2%
Tarcoola Beach	35%	2%
Woorree	25%	7%
West End	10%	2%
Narngulu	1%	1%
		100%

6.42. For the purposes of this PIA, statistical information is provided mainly for the suburbs of Wonthella, Geraldton, Rangeway, Mahomets Flats, Karlooloo, Beachlands, Beresford, Mount Tarcoola and Utakarra as they are considered the most relevant in this case based on the percentage estimates in the table above. Statistical information for the other suburbs listed has not been closely assessed for the purposes of this PIA on the basis that to do so would likely distort the overall picture given the small portions relevant to the 3km locality.

6.43. Key physical features of the 3km locality, which can be clearly seen in the maps above and other images and information in this PIA, North West Coastal

Highway, Geraldton-Mount Magnet Road, the connection between those arteries and the western side, railway line, coastline, industrial and light industrial areas, residential areas and undeveloped land.

- 6.44. “[T]he word ‘locality’ in s 36B denotes an area that surrounds, and is geographically close to, the location of the proposed premises”⁵¹.
- 6.45. “Given the context and purpose of s 36B, the word ‘locality’ is intended to connote the same concept of neighbourhood. I consider that, in this context, it means the geographical area surrounding the proposed site. Section 36B seeks to add an additional hurdle before a licence may be granted under which packaged liquor can be sold. It seeks to ensure that there are not multiple premises in close proximity to one another selling packaged liquor.”⁵²
- 6.46. “This is not to say that the ‘locality’ will inevitably, or even usually, be a circular area within a particular radius of the proposed site. The shape and size of the ‘locality’ may be influenced by topographical features (including man-made features such as roads) and the areas from which the proposed site could be accessed reasonably easily on foot or push-bike. If there is a community in the area of the proposed site, the geographical spread of that community may also influence the shape and size of the ‘locality’”⁵³.
- 6.47. “[D]ue to the variety of factual situations that may arise, it is impossible to prescribe a specific test to be applied or even an exhaustive list of the factors that will or may be relevant in the determination of the locality in any given case. As has been observed in other jurisdictions, there will be some cases where it will be easy to determine the locality, and other cases where it will not be. An example of the former would be where the proposed premises was to be placed in a small country town. An example of the latter would be where it was to be placed in the CBD.”⁵⁴
- 6.48. “What constitutes a ‘locality’ relates to the geographical area surrounding, and what is relatively close to, the proposed site”⁵⁵.
- 6.49. “In any event, the factors which can be contemplated in deciding ‘locality’ must remain diverse and fluid and it is contemplated that the Director may impose different localities in respect to different applications, provided that, in the interests of natural justice, such decision is made on reasonable and ascertainable grounds”⁵⁶.

⁵¹ *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* [2021] WASC 366 (**Liquorland Karrinyup**) [181] (Archer J); confirmed in *Liquorland Southern River* [62] (Lemonis)

⁵² *Liquorland Karrinyup* [182] (Archer J); confirmed in *JB Foods Pty Ltd v Commissioner of Police* [2022] WASC 352 [15] (Smith J) and *Liquorland Southern River* [62] (Lemonis)

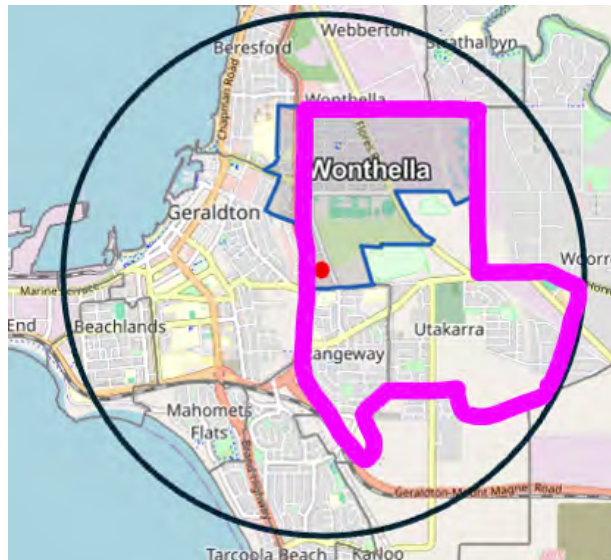
⁵³ *Liquorland Karrinyup* [185] (Archer J); confirmed in *JB Foods Pty Ltd v Commissioner of Police* [2022] WASC 352 [16] (Smith J) and *Liquorland Southern River* [62] (Lemonis)

⁵⁴ *Liquorland Karrinyup* [186] (Archer J); confirmed in *Liquorland Southern River* [62] (Lemonis)

⁵⁵ *JB Foods Pty Ltd v Commissioner of Police* [2022] WASC 352 [14] (Smith J); *Liquorland Karrinyup* [186] and [190] (Archer J)

⁵⁶ *Endeavour Group Limited v Director of Liquor Licensing and ors* LC07/2023 at [164]; *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* LC09/2023 [92]

- 6.50. “The imposition of a radius circle is not necessarily appropriate where such the same encompasses an artificial area. To adopt a patently artificial radius does not reflect the licensing authority’s mandate to have regard to the primary objects of the Act and the functions of the licensing authority which require consideration of the actual impacts of a proposed application”.⁵⁷
- 6.51. For the purposes of section 36B of the Act and having regard to the findings of the Court in *Liquorland Karrinyup*, upheld in *Liquorland Southern River*, the applicant submits that the relevant locality in this case is a portion of the 3km locality. It is proposed to be the suburbs of Wonthella, Rangeway and Uta Karra that are on the eastern side of North West Coastal Highway, up to the 3km locality boundary. This area is depicted in the following map in thick **bright pink outline (s36B locality)**.



- 6.52. The proposition for the area highlighted in pink above as the s36B locality is based on the following reasons:
- 6.52.1. This area “surrounds and is geographically close to the location of the proposed premises”⁵⁸, which are key locality defining criteria.
 - 6.52.2. The area proposed as the s36B locality is a local neighbourhood⁵⁹.
 - 6.52.3. The ALDI liquor display and browse area will be a tiny space with no visibility whatsoever external to the ALDI store. In fact, the liquor section will only be visible from well within the ALDI supermarket. When this is considered in the context of the surrounding area it is clear that the size of the ALDI liquor section is even further reduced in scale. Having regard for these factors, it could be artificial to extend the relevant locality to an area wider than the s36B locality. This

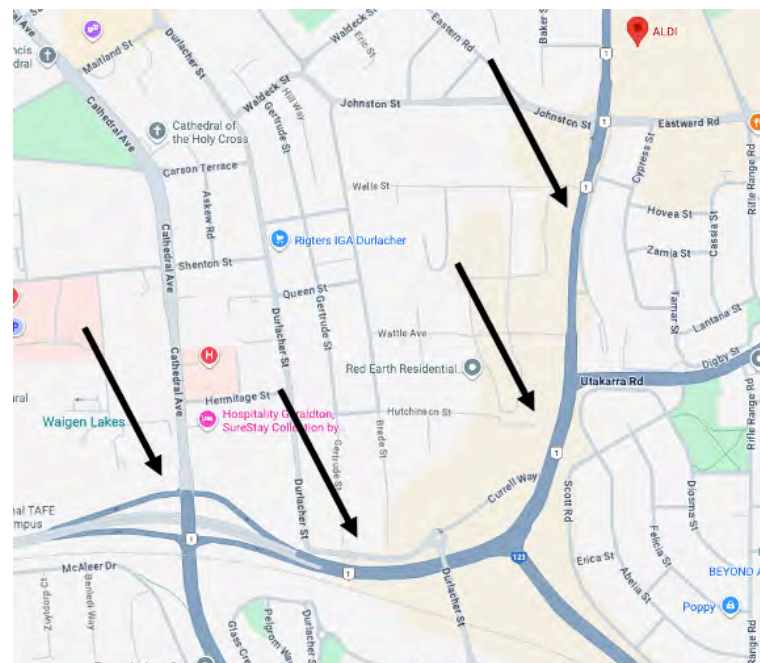
⁵⁷ *Endeavour Group Limited v Director of Liquor Licensing and ors* LC 07/2023 [172]; *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* LC 09/2023 [99]

⁵⁸ *Liquorland Karrinyup* [181] (Archer J)

⁵⁹ *Liquorland Karrinyup* [182, for example] (Archer J)

proposition is supported by the obiter dictum of Lemonis J in *Liquorland Southern River* at [65].

6.52.4. North West Coastal Highway is a notable delineation and demarcation. In addition, its enormous physical amenity presence, it demands considered time and effort to be traversed. Where it connects with other nearby main arteries of Geraldton Mount Magnet Road, John Willcock Link, Cathedral Avenue and Brand Highway there is a major, elaborate highway intersection and bridge system comprising multiple lanes and entries and exists going various directions. The following Google Maps images depict aspects of these factors. The location of ALDI Wonthella is shown by the red balloon at top right.



- 6.53. Having regard for sections 16(7)(b) and (c) of the Act, the Department's "common-sense approach" policy⁶⁰ and the State Government's published desire to make it less complicated and easier to do business in the WA liquor industry⁶¹, the assessment of locality in this PIA is not exhaustive. The applicant has provided a level of detail considered appropriate for the circumstances in terms of the content of this document and the attachments. Further detail, additional copies of source material and supplementary supporting evidence can be provided if necessary. The applicant has had regard for the decision in Liquorland Karrinyup and the fact that the 3km locality and s36B locality are both very established and presumably the licensing authority is properly familiar with them and so only pertinent locality material has been included⁶².
- 6.54. The following images depict aspects of the area immediately surrounding ALDI Wonthella:



⁶⁰ Form 2A page 2 and at:

<https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

⁶¹ For example: <https://www.cits.wa.gov.au/department/news/news-article/2024/08/29/liquor-licensing-policy-reform-a-big-win-for-wa-hospitality-industry>

⁶² Further detailed information and supporting documents can be provided if required, upon request

Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella



Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella



6.55. The following images depict aspects of the wider area on the western side of the 3km locality⁶³:



6.56. Further particulars regarding the s36B locality and 3km locality are provided elsewhere in this PIA. They are both well established areas which are presumably known to the licensing authority. The applicant has carefully considered both the 3km locality and s36B locality, as referred to throughout this document and the accompanying Legal Submissions.

⁶³ City of Greater Geraldton Annual Report 2023/24 (<https://www.cgg.wa.gov.au/annual-reports.aspx>) at cover page,

- 6.57. As required by the Form 2A, the applicant provides the following “names and addresses of all existing licensed premises within the [s36B] locality”⁶⁴ – the “packaged liquor premises”⁶⁵ are identified in **bold**:
- 6.57.1. Geraldton Golf Club, 30 Pass Street, Geraldton
 - 6.57.2. Geraldton Districts Italian Sporting & Social Club, Eighth Street, Wonthella
 - 6.57.3. La Fiamma Sporting Club Inc, Salvatore Sciuto Park, Eighth Street, Wonthella
 - 6.57.4. Geraldton Softball Assn Inc, cnr Flores and Antares Roads, Geraldton
 - 6.57.5. Geraldton Rovers Soccer Club Inc, Reserve 32023 Alexander Street, Utakarra
 - 6.57.6. Rover Football Club Inc, Eastwood Road, Utakarra
 - 6.57.7. **Con’s Liquor Geraldton**, Lot 86 (73) Utakarra Road, Utakarra
 - 6.57.8. Geraldton Turf Club, 71 Eastward Road, Utakarra
 - 6.57.9. **BWS – Beer Wine Spirits Wonthella**, 44 North West Coastal Highway, Wonthella
 - 6.57.10. **Wonthella SUPA IGA Supermarket & Cellarbrations Liquor Store**, 244-252 Fifth Street, Wonthella
 - 6.57.11. Club Wonthella, Eight Street, Wonthella
 - 6.57.12. Towns Football Club Geraldton Inc, Eighth Street, Wonthella
 - 6.57.13. Theatre ‘8’, 228 Eighth Street, Wonthella
 - 6.57.14. Mid West Irish Club Inc, cnr Fourth and Howard Streets, Wonthella
 - 6.57.15. Geraldton Hockey Assn Inc, 258 Eighth Street, Wonthella
 - 6.57.16. Geraldton & Districts Badminton Assn Inc, Eighth Street, Wonthella
 - 6.57.17. Geraldton Amateur Basketball Assn, Activewest Stadium, 238 Eighth Street, Wonthella
 - 6.57.18. The Geraldton Squash Rackets Association (Inc), 288 Eighth Street, Wonthella
 - 6.57.19. Geraldton Tennis Centre Inc, 256 Eighth Street, Wonthella
- 6.58. Additional information and submissions regarding the three “packaged liquor premises”⁶⁶ listed above are provided further on in this document.

⁶⁴ Based on information published by the Department as at 5 September 2025, listed in the order as appears in the Department’s database for each suburb: <https://portal.dlgsc.wa.gov.au/forms/fr/search/findallicence/new>

⁶⁵ As defined in section 36B of the Act

⁶⁶ As defined in section 36B of the Act

- 6.59. Beyond the s36B locality, are the following existing licensed premises which are all located at least 1.3km away⁶⁷, most around 2km, again with the “packaged liquor premises”⁶⁸ identified in **bold**:
- 6.59.1. 30knots Distillery, 166 Chapman Road, Beresford
 - 6.59.2. **Geraldton Hotel**, 19 Gregory Street, Geraldton
 - 6.59.3. **Ocean Centre Hotel**, 144 Marine Terrace, Geraldton
 - 6.59.4. **Corcorans Geraldton Beach Hotel**, 15 Fitzgerald Stret, Geraldton
 - 6.59.5. **The Murchison Tavern**, 20 Chapman Road, Geraldton
 - 6.59.6. **Freemasons Hotel**, 79 Marine Terrace, Geraldton
 - 6.59.7. **Cellarbrations Central / Bullseye Birdies**, 41 Chapman Road, Geraldton
 - 6.59.8. **Liquorland Northgate Plaza**, Shop 1, Northgate Plaza Shopping Centre, lot 17 Chapman Road, Geraldton
 - 6.59.9. **BWS – Beer Wine Spirits Geraldton**, Shops 23 and 24 (lot 32) 54 Sanford Street, Geraldton
 - 6.59.10. The Geraldton Club, 160 Marine Terrace, Geraldton
 - 6.59.11. Geraldton Bowling Club, Onslow Street, Geraldton
 - 6.59.12. Geraldton Yacht Club, Marine Terrace, Geraldton
 - 6.59.13. Railways Football Club Geraldton Inc, Recreation Ground, Augustus Street, Geraldton
 - 6.59.14. Emerald Room Restaurant, Hospitality Inn, Cathedral Avenue, Geraldton
 - 6.59.15. Ibis Styles Geraldton, Brand Highway, Geraldton
 - 6.59.16. Dome Geraldton, Lot 506 Foreshore Drive, Geraldton
 - 6.59.17. Smokin Grill and Burgery, Shop 2, Post Office Plaza, 52 Durlacher Street, Geraldton
 - 6.59.18. L'Italiano – Pizza, Pasta & Gelato, 1 Fitzgerald Street, Geraldton
 - 6.59.19. The Vibe Nightclub Geraldton, 38 Fitzgerald Street, Geraldton
 - 6.59.20. Queens Park Theatre, Cathedral Avenue, Geraldton
 - 6.59.21. Central Regional TAFE – Zeewijk Training Restaurant, 173 Fitzgerald Street, Geraldton
 - 6.59.22. Geraldton City RSL Sub Branch Club, 46 Chapman Road, Geraldton
 - 6.59.23. Eureka Promotions Inc, 100 Flores Road, Geraldton

⁶⁷ Based on information published by the Department as at 5 September 2025, listed in the order as appears in the Department's database for each suburb: <https://portal.dlgsc.wa.gov.au/forms/fr/search/findallicence/new>

⁶⁸ As defined in section 36B of the Act

- 6.59.24. Tarcoola Park Tennis Club Inc, 14 Glengarry Court, Mt Tarcoola
- 6.59.25. The Provincial Café and Bar, 167 Marine Terrace, Geraldton
- 6.59.26. Skeetas Restaurant & Café, 219 Foreshore Drive, Geraldton
- 6.59.27. The Mad Mexican, 79 Durlacher Street, Geraldton
- 6.59.28. **Batavia Brewing**, 60 Fitzgerald Street, Geraldton
- 6.59.29. **Cellarbrations at the Queens**, 79 Durlacher Street, Geraldton
- 6.59.30. The Gerald Apartment Hotel, 25 Cathedral Avenue, Geraldton
- 6.59.31. Hog's Breath Cafe - Geraldton, Suite 3, 30 Chapman Road, Geraldton
- 6.59.32. Laian Restaurant and Café, 56 Cathedral Avenue, Geraldton
- 6.59.33. Brown Boys Curry House Midwest, 54 Sanford Street, Geraldton
- 6.59.34. Orana Cinemas - Geraldton, 229-235 Marine Terrace, Geraldton
- 6.59.35. Piper Lane Café, 158 Marine Terrace, Geraldton
- 6.59.36. The Foreshore Hangout Lounge, 36 Foreshore Drive, Geraldton
- 6.59.37. Blue Heelers Square, 181-195 Marine Terrace, Geraldton
- 6.59.38. **Geraldton Motor Inn**, 107 Brand Highway, Mount Tarcoola
- 6.59.39. **Olive Tree Tavern**, Lot 160 cnr Place Road and Hibertia Street, Strathalbyn (conditionally granted)
- 6.59.40. African Reef Beach Resort, 5 Broadhead Avenue, Tarcoola Beach

7. Form 2A “Part 3 – The profile of the local community”

Form 2A: “3.1 Please outline the population characteristics in the locality”

7.1. From the 2021 Census, the ABS recorded the following numbers of people living in the suburbs reflected in the 3km locality relative to the estimated portions of each suburb that are developed and populated within the 3km locality.

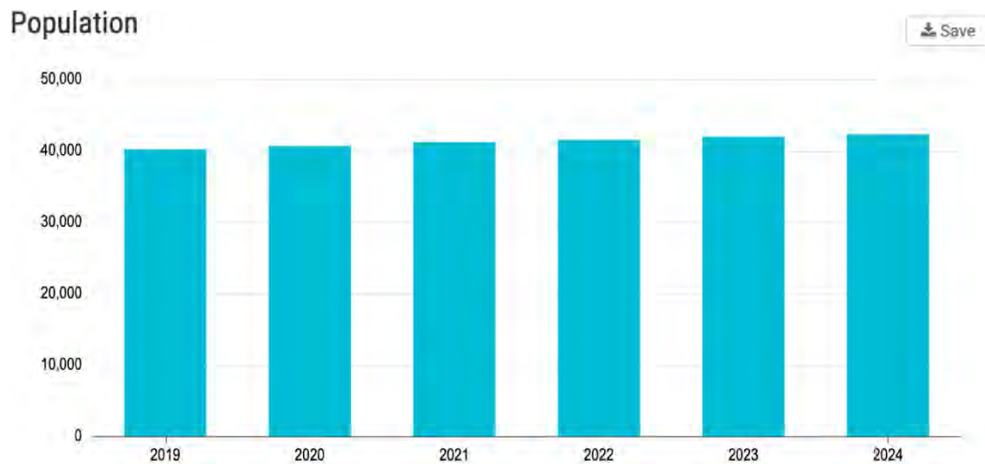
	Total 2021 suburb population ⁶⁹	Portion estimated within the 3km locality ⁷⁰
Wonthella	1,711	1,711
Geraldton	3,246	3,246
Rangeway	1,871	1,871
Mahomets Flats	806	806
Karlooloo	495	491

⁶⁹ ABS 2021 Census: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50536> (Geraldton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51280> (Rangeway), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50880> (Mahomets Flats), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50730> (Karlooloo), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50084> (Beachlands), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50112> (Beresford), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51036> (Mount Tarcoola) and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51486> (Utakarra)

⁷⁰ As described/explained earlier on in this PIA

Beachlands	1,400	1,386
Beresford	1,463	1,390
Mount Tarcoola	3,257	2,932
Utakarra	1,467	1,174
Collective total estimated to be living within the 3km locality at that 2021 Census		15,007

- 7.2. On the basis that at the 2021 Census 39,489 people were recorded as living in the City of Greater Geraldton⁷¹, the 3km locality represents approximately 40% of the total local government area.
- 7.3. In addition to the resident population are tourists and other visitors to the area, as are referred to elsewhere in this PIA and who comprise hundreds of thousands of people per year⁷².
- 7.4. The City of Greater Geraldton has published more recently that it is “[h]ome to 42,322 people, Greater Geraldton supports 17,998 jobs and has an annual economic output of \$8.259 billion...The mining industry sector makes the greatest contribution to economic output in the region, which at \$1.4 B accounts for 17.3% of total output...With 3,126 jobs representing 17.37% of total employment, it is the health care and social assistance industry sector that is the region’s largest employer”⁷³.
- 7.5. There has been slight but steady population growth, partly illustrated by the following graph⁷⁴:



- 7.6. Building approvals have significantly increased since 2022, as illustrated by the following⁷⁵:

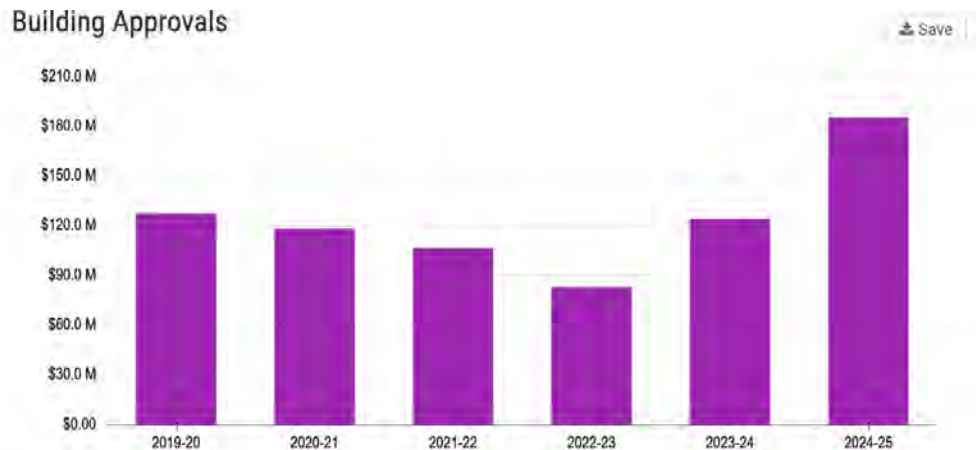
⁷¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA53800>

⁷² City of Greater Geraldton Overnight Visitor Factsheet 2023, Tourism WA, May 2024 (copy attached)

⁷³ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁷⁴ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁷⁵ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>



7.7. The following “population characteristics of the locality”⁷⁶ have been identified for people living in the 3km locality⁷⁷. Statistics for the whole of WA have been provided for comparative and contextual purposes.

	Wonthella	Geraldton	Rangeway	Mahomets Flats	Karoo	WA
Aged 19 and under	21.6%	19.7%	30%	23.2%	33.8%	23.9%
Aged 65 and over	21.3%	28%	14.4%	15.4%	12%	16.1%
Aboriginal and/or Torres Strait Islander	10.6%	8.6%	22.1%	8.8%	22.2%	3.3%
Born in Australia	77.1%	70.6%	71.4%	77.9%	67.1%	62%
English only, at home	82.2%	77.4%	75.5%	85.5%	68.7%	75.3%
Most common religious affiliation	Catholic 22.2%	Catholic 22.7%	Catholic 17.5%	Catholic 24.3%	Catholic 14.5%	Catholic 18.7%
In the labour force	54.7%	50.6%	43.3%	62.8%	43.2%	63.9%
Unemployed	6.1%	7.6%	14.5%	4.8%	15.8%	5.1%

	Beachlands	Beresford	Mount Tarcoola	Utakarra	WA
Aged 19 and under	18.8%	20.8%	27.1%	31.5%	23.9%
Aged 65 and over	20.9%	21.6%	17.2%	12.3%	16.1%
Aboriginal and/or Torres Strait Islander	9.5%	4.2%	5.8%	22.1%	3.3%
Born in Australia	76.7%	75.9%	78.7%	76.2%	62%
English only, at home	83%	82.4%	85.1%	79.2%	75.3%
Most common religious affiliation	Catholic 19.4%	Catholic 26.1%	Catholic 24.5%	Catholic 20.5%	Catholic 18.7%
In the labour force	57.2%	63.1%	66.4%	55.5%	63.9%
Unemployed	5.2%	5.1%	3.6%	11.3%	5.1%

⁷⁶ Form 2A

⁷⁷ ABS 2021 Census: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50536> (Geraldton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51280> (Rangeway), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50880> (Mahomets Flats), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50730> (Karoo), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50084> (Beachlands), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50112> (Beresford), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51036> (Mount Tarcoola) and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51486> (Utakarra)

- 7.8. Wonthella covers an area of approximately 3.7km².⁷⁸ The average person living in Wonthella, statistically speaking based on ABS Census data from 2021⁷⁹, can be described as follows:
- 7.8.1. female aged 43,
 - 7.8.2. self identifying as “non-indigenous”⁸⁰,
 - 7.8.3. not currently married or in a de facto relationship and living with no children,
 - 7.8.4. born in Australia, of English ancestry but with both parents having been born in Australia,
 - 7.8.5. of no religious affiliation,
 - 7.8.6. with only English used in the home,
 - 7.8.7. in the labour force, working full-time,
 - 7.8.8. with a personal weekly income of \$615 and
 - 7.8.9. not suffering a long-term health condition.
- 7.9. Most people living in Wonthella own their own home, either outright or with a mortgage⁸¹, with a current average market value of \$403,000⁸². They have enjoyed a five-year growth rate in the property market⁸³. Surrounding suburbs of Rangeway, Beachlands and Utaarra have been experiencing significant growth most recently at 30.4%, 29.7% and 27.1% respectively⁸⁴.
- 7.10. The following snapshot of all people living in the whole of the City of Greater Geraldton⁸⁵ provides further insight into characteristics of the wider area, together with some visitor data. Additional tourist numbers are referred to further on in this PIA.

⁷⁸ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁷⁹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635>

⁸⁰ Based on ABS definition/categorisation

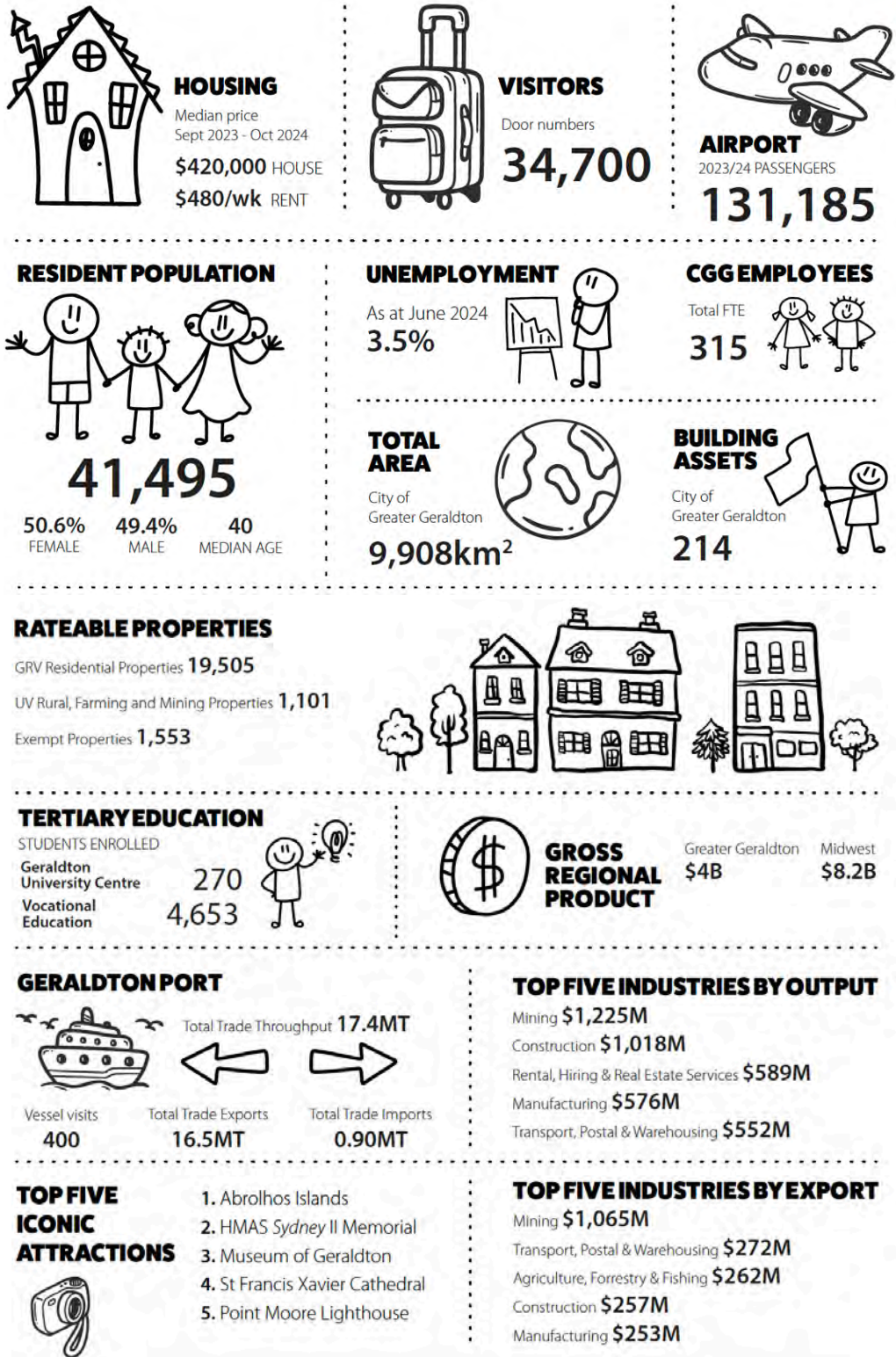
⁸¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella),

⁸² <https://reiwa.com.au/suburb/wonthella/>

⁸³ <https://reiwa.com.au/suburb/wonthella/>

⁸⁴ <https://reiwa.com.au/the-wa-market/regional-market-insights/>

⁸⁵ City of Greater Geraldton Annual Report 2023/2024, at page 5 (copy available if required, upon request)



7.11. “Geraldton is a thriving regional city, overlooking the Indian Ocean and supporting a rapidly growing population. Situated just over 400km north of Perth, Geraldton has all the major services, cultural, shopping and sporting facilities you would expect in a city, yet a more relaxed pace of life, typical of the country. As the regional service centre for the entire Mid West region, business

and employment opportunities are many and diverse. From fishing to tourism, mining to agriculture, small business to government roles and a comprehensive range of tertiary service industries, people from all walks of life are attracted to Geraldton's climate of opportunity... Greater Geraldton is a rapidly growing area, rich in indigenous and pioneering history. Geraldton is surrounded by Greenough which boasts fertile farm land and world class beaches. Situated an hour's drive inland from Geraldton, Mullewa sits in the heart of the wildflower region of Western Australia."⁸⁶

- 7.12. Socio-Economic Indexes for Areas by Local Government Area⁸⁷, which measure the relative level of socio-economic disadvantage and/or advantage, based on a range of ABS data have ranked the City of Greater Geraldton around the mid of the third quarter at number 96 out of 140, with a rating of 941, indicating that the average resident experiences slightly lower than average level of socio-economic conditions. This is can reasonably be presumed to be associated with the fact that a larger portion of the population appear to be retirees.
- 7.13. It is acknowledged that some people living in the 3km locality experience lower than average socio-economic circumstances and that this factor may, at first glance, be regarded as negative. Based on the following reasons it is respectfully submitted that such conditions are mitigated in this case and should not inhibit the grant of the licence:
- 7.13.1. The positive factors associated with the application are significant and of much greater weight.
 - 7.13.2. The circumstances surrounding the whole of and role of the City of Greater Geraldton ,as the capital and resource centre for the Mid West region, are very positive.
 - 7.13.3. The applicant's pricing, quality and value-for-money policies will enable people living in the 3km locality to be able to access and enjoy quality, award-winning liquor products which they might not otherwise be able to access.
 - 7.13.4. People experiencing low socio economic conditions should still be able to access liquor products and services that are very popular elsewhere, as ALDI's are.
 - 7.13.5. People experiencing low socio economic conditions should still be able to benefit from modern conveniences associated with liquor purchasing including one-stop shopping which is now a very established and expected aspect of modern consumer retailing but is currently not available in the area.

⁸⁶ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁸⁷ Index of Relative Socio-Economic Advantage and Disadvantage, 2021: <https://profile.id.com.au/wapl/seifa-disadvantage?SeifaKey=40002>; Western Australia Parliamentary Library community profile, idcommunity

- 7.13.6. The particulars of the ALDI Wonthella proposal should confirm that it will be a relatively discrete and low impact liquor outlet with little capacity to exacerbate low socio economic circumstances.
- 7.14. Further details of the nature and characteristics of the local community are provided elsewhere in this PIA.

Form 2A “3.3 (sic) List the community buildings in the locality”

- 7.15. As required by the Form 2A, the applicant provides names and addresses for the following identified to be operating in the 3km locality (some of which may be relevant under more than one heading/category but are only listed once):
- 7.15.1. Schools and educational institutions:
- 7.15.1.1. Desert to Coast Training and Assessing Geraldton, 39 Bradford Street, Wonthella
 - 7.15.1.2. Rangeway Primary School, 4 Cassia Street, Rangeway
 - 7.15.1.3. St John’s School, 12 Tamar Street, Rangeway
 - 7.15.1.4. Geraldton Senior High School, Carson Terrace, PMB 10100, Geraldton
 - 7.15.1.5. Holland Street School, 12 Holland Street, Geraldton
 - 7.15.1.6. Geraldton Primary School, 75 Fitzgerald Street, Geraldton
 - 7.15.1.7. St Francis Xavier Primary School, 5 Maitland Street, Geraldton
 - 7.15.1.8. Geraldton Flexible School, 27 Bayly Street, Geraldton
 - 7.15.1.9. Allendale Primary School, 52 Wittenoom Street, Geraldton
 - 7.15.1.10. Geraldton Grammar School, 134 George Road, Geraldton
 - 7.15.1.11. Child Care Course Geraldton – Micon Training, Sanford Street, Geraldton
- 7.15.2. Hospitals:
- 7.15.2.1. Geraldton Regional Hospital, 51-85 Shenton Street, Geraldton
 - 7.15.2.2. St John of God Geraldton Hospital, 12 Hermitage Stret, Geraldton
 - 7.15.2.3. Geraldton Health Campus, 30 Johnston Street, Geraldton
- 7.15.3. Hospices:
- 7.15.3.1. Geraldton Shore Care Community, 159 Fitzgerald Street, Geraldton

- 7.15.3.2. Attune Nursing and Disability Services, 75 Forrest Street, Geraldton
- 7.15.4. Aged care facilities:
 - 7.15.4.1. Bethanie Geraldton Social Centre, 38 Cairncross Street, Geraldton
 - 7.15.4.2. Juniper Hillcrest, 40 Onslow Street, Geraldton
 - 7.15.4.3. Midwest Aged Care Assessment Team/Geraldton Health Campus, Shenton Street, Geraldton
 - 7.15.4.4. Geraldton Nursing Home, 20 Milford Street, Geraldton
 - 7.15.4.5. Silverchain – Geraldton Service Centre, 114 Sanford Street, Geraldton
 - 7.15.4.6. Avocare Geraldton Office, 14 Foreshore Drive, Geraldton
 - 7.15.4.7. Avivo, 1/114 Sanford Street, Geraldton
- 7.15.5. Churches/places of worship:
 - 7.15.5.1. St Patrick's Catholic Church, cnr Third and Howard Streets, Wonthella
 - 7.15.5.2. Hope Lutheran Community Church, 250 Third Street, Wonthella
 - 7.15.5.3. Sun City Christian Centre, 14 Assen Street, Rangeway
 - 7.15.5.4. St John's Catholic Church, Lot 1931 Banksia Street, Rangeway
 - 7.15.5.5. Lighthouse Church Geraldton, 43 Shenton Street, Geraldton
 - 7.15.5.6. Living Word Church Geraldton, 8 Milford Street, Geraldton
 - 7.15.5.7. Church of Christ Geraldton, 105 Augustus Street, Geraldton
 - 7.15.5.8. Cathedral of the Holy Cross, 101 Cathedral Avenue, Geraldton
 - 7.15.5.9. St Francis Xavier Cathedral, 56 Cathedral Avenue, Geraldton
 - 7.15.5.10. Fresh Christian Fellowship, 225 Lester Avenue, Geraldton
 - 7.15.5.11. The Potters House Gospel Church Geraldton, 10 Baker Street, Geraldton
 - 7.15.5.12. Geraldton Baptist Church, 46 Quarry Street, Geraldton
 - 7.15.5.13. Geraldton Family Church, 1/3 Walton Close, Geraldton

- 7.15.5.14. The Salvation Army Geraldton Corps, 42 Ainsworth Street, Geraldton
- 7.15.5.15. Geraldton District Mosque, 172 George Road, Geraldton
- 7.15.5.16. Greek Orthodox Church of the Archangels Michael and Gabriel, 15 Mark Street, Beresford
- 7.15.6. Drug and alcohol treatment centres:
 - 7.15.6.1. Midwest Community Drug Service, 51-85 Shenton Street, Geraldton
 - 7.15.6.2. Regional Alliance West, Lotteries House, 1/114 Sanford Street, Geraldton
 - 7.15.6.3. Hope Community Services, 80a Forrest Street, Geraldton
 - 7.15.6.4. Step Up/Step Down Geraldton, 2 Larkin Street, Geraldton
- 7.15.7. Short term accommodation or refuges: Desert Blue Connect, 25 Chapman Road, Geraldton
- 7.15.8. Childcare centres:
 - 7.15.8.1. Magic Cottage Child Care Centre, 236 Fourth Street, Wonthella
 - 7.15.8.2. Goodstart Early Learning Wonthella, 250/254 Place Road, Wonthella
 - 7.15.8.3. Little Nemo's Geraldton, 1 Pass Street, Wonthella
 - 7.15.8.4. Ngala Child and Parent Centre, 13 Hovea Street, Geraldton
 - 7.15.8.5. Little Kingdom Childcare, 143 Brand Highway, Mount Tarcoola
 - 7.15.8.6. Turtle Cove Early Learning Central, 44 Gertrude Street, Geraldton
 - 7.15.8.7. Bambi Childcare Centre, 175 Fitzgerald Street East, Geraldton
 - 7.15.8.8. Bambi Childcare Centre, 166 Augustus Street, Geraldton
 - 7.15.8.9. OSCCA, Ramshaw Place, Geraldton
 - 7.15.8.10. Home Interaction Program for Parents & Youngsters (HIPYPY) Geraldton, 184 Marine Terrace, Geraldton
 - 7.15.8.11. Centacare Family Services, 3 Maitland Street, Geraldton
 - 7.15.8.12. Gumnuts Clubhouse and Family Daycare, 57 Dorothy Street, Geraldton
 - 7.15.8.13. Kidz Retreat, 171 George Road, Beresford

- 7.15.9. Local government: City of Greater Geraldton
- 7.16. Other facilities in the 3km locality which could potentially be regarded as "community buildings" for this section of the PIA, include the following:
- 7.16.1. Geraldton PCYC, 105 Pass Street, Wonthella
- 7.16.2. Queen Elizabeth II Community Centre, 88 Durlacher Street, Geraldton
- 7.16.3. The Mens Shed Geraldton Inc, 67 Gregory Street, Geraldton
- 7.16.4. Geraldton Regional Community Education Centre, 24 Gregory Street, Geraldton
- 7.16.5. Connected Beginnings Geraldton Parent Hub, 29 Whitfield Street, Beachlands
- 7.16.6. Geraldton Multipurpose Centre, 250 Marine Terrace, Geraldton
- 7.16.7. Centacare Men's Hub, 156 Durlacher Street, Geraldton
- 7.16.8. Play More, 9/65 Chapman Road, Geraldton
- 7.17. The ALDI Wonthella liquor section will not be visible, nor directly accessible, from any of the places listed above or anyone walking or driving to or from any of those places, nor to any residence. The proposed licensed area will be concealed to anyone outside of the ALDI store.

8. Form 2A "Part 4 – Minimising the potential for alcohol to cause harm"

Form 2A "4.1 What strategies will you use to minimise harm from the use of alcohol?"

- 8.1. Risk management and harm minimisation from the sale and supply of liquor are not only very familiar subjects to ALDI but are prominent considerations and given priority in operational policies. ALDI has been successfully implementing measures that minimise harm and ill-health at its large number of existing liquor outlets for many years. Its liquor store model has been much tried and tested and proven to be entirely positive.
- 8.2. The applicant has had regard for harm and ill-health factors potentially associated with the new liquor licence, with reference to its trading history. The applicant has an excellent trading record in terms of compliance and is not aware of any of its licences causing harm or ill-health.
- 8.3. Any potential negative impact of the licence should be considered in light of the low risk features of the ALDI liquor model, which are described throughout this PIA. This proposition is supported by the following finding of the Liquor Commission in ALDI Harrisdale⁸⁸ which involved virtually the same proposal:

⁸⁸ ALDI Harrisdale [38(b)]

"There is nothing to suggest that the granting of the licence will result in an increase in harm and ill-health. The small size of the proposed premises, the nature of its operation and the limited number of products are significant factors in reaching this conclusion."

- 8.4. To reiterate, no part of the proposed licensed area will be visible in any way to/from churches, schools, hospitals and childcare centres etc within the 3km locality.
- 8.5. The applicant has sought to identify current information regarding alcohol related hospitalisations and deaths specifically associated with the 3km locality, but none could be identified from published material. Further, "due to different classification systems and alcohol as a contributing factor not being recorded within all health datasets, challenges exist in quantifying the incidence of alcohol-related injuries in WA"⁸⁹. In addition, there is no authoritative definition of, or clear criteria for, what might be regarded as "alcohol related".
- 8.6. Nonetheless, the applicant acknowledges that hospitalisation and death:
- 8.6.1. can potentially result for some people as a consequence of the use of liquor and
- 8.6.2. has occurred and would most likely be currently occurring at some level in the 3km locality, in relation to the use of liquor.
- 8.7. The WA Primary Health Alliance Midwest Needs Assessment 2022-2024⁹⁰ has been considered. It relates to the whole of the Midwest region. The following has been identified from that Assessment:
- 8.7.1. The Midwest region has recorded statistically higher long term health risks among residents, in terms of liquor consumption (at page 7).
- 8.7.2. Emergency department presentations in the Midwest for alcohol and other drugs were recorded and may be higher than some other parts of the State, although the statistics were not fully quantified (page 8).
- 8.7.3. "The dominant health concerns in the Midwest are mental health, chronic disease and alcohol consumption" (page 12)
- 8.8. 2021 ABS data reveals that the top long term health condition for residents of Wonthella is asthma⁹¹. The top three long-term health conditions of residents in the 3km locality are mental health issues followed by arthritis and asthma⁹². The

⁸⁹ Alcohol-related injuries in Western Australia Position Paper, by Injury Matters, dated April 2022, at page 2 (www.injurymatters.org.au) – copy of the paper available if required, upon request

⁹⁰ Copy available if required, upon request

⁹¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635>

⁹² Combined average of 2021 ABS Census data for the suburbs that are most representative of the 3km locality: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50536> (Geraldton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51280> (Rangeway), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50880> (Mahomets Flats), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50730> (Karlooloo),

latter two are of virtually equal prevalence. Neither arthritis nor asthma are known to be commonly associated with liquor.

- 8.9. “[D]ata from Roy Morgan’s Alcohol Consumption Report shows the proportion of Australians who drink alcohol dropped by 1.8 percentage points to 67.9 per cent in the 12 months to June 2022”⁹³. Data for the 12 months to March 2023 showed an increase of 1.3%, but relevantly “[t]he most significant driver of the increase [was] the increasing popularity of RTDs (Ready-to-drink)”⁹⁴ and ALDI’s liquor range includes only a tiny number of RTDs. The attached stocklist contains only six different RTDs. They will certainly not be available in bulk or even in large supply compared to other liquor outlets, given ALDI’s modest stock volume and manner of trade and they will only be available warm and during limited trading hours.
- 8.10. “Alcohol consumption has been declining among students in WA over the past few decades (WA Mental Health Commission, 2017). In 1999 around 36% of students surveyed reported having used alcohol in the past week, in comparison to 15% in 2017. Over this period the number of students reporting never having consumed alcohol increased from 10% to 38% (WA Mental Health Commission 2017)”⁹⁵.
- 8.11. ALDI has factored advertising and promotion into its harm minimisation strategies. Flamboyant and highly suggestive advertising posters, encouraging or even suggesting rapid, excessive or juvenile drinking are not displayed in association with ALDI’s liquor service. Nor does ALDI advertise discount liquor prices for certain periods. This is because traditional, ad hoc “sales” may encourage customers to purchase more liquor than they otherwise would have for fear of missing out on the deal.
- 8.12. Placing a heavy focus on staff is another key strategy for implementing policies and practices are complying with relevant laws.
- 8.13. ALDI operates pursuant to a highly evolved and sophisticated corporate structure and hierarchy whereby staff at each level are entrusted with an advanced degree of responsibility and are provided with extensive and comprehensive training and support.
- 8.14. ALDI is a market leader in terms of staff training and development. Its impressive approach in this regard is detailed in the following sub-paragraphs:
- 8.14.1. “We believe that good people working together, united by a shared purpose, can achieve extraordinary things. ALDI isn’t just a workplace; it’s a place where you’ll be part of a tight-knit team that

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50084> (Beachlands),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50112> (Beresford),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51036> (Mount Tarcoola) and

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51486> (Utakarra)

⁹³ <https://theshout.com.au/australian-alcohol-consumption-declines-rtcd-consumption-at-record-high/>

⁹⁴ <https://www.roymorgan.com/findings/9153-alcohol-consumption-march-2023>

⁹⁵ Perth North PHN Needs Assessment 2022-2024 prepared by WA Primary Health Alliance at page 25 (copy available if required and upon request by the licensing authority)

supports and uplifts each other, where you can learn, grow and develop and make a meaningful impact by helping everyday Australians live richer lives for less.”⁹⁶

8.14.2. “We provide [staff] with comprehensive training including induction training and quarterly retraining. We also offer leadership training programs that help create the operational leaders of the future.”⁹⁷

8.14.3. “We offer diverse and cross-functional career pathways. We also value internal promotions with over 70% of our leaders promoted internally.”⁹⁸

8.14.4. “ALDI Australia has taken top spot in the Australian Business Award’s – Employer of Choice 2020”⁹⁹.

8.14.5. ALDI has been awarded Retail Employer of the Year at the eftpos Australian Retail Association Awards.

The ARA said that ALDI have proven to be “fierce contenders” with a strong commitment to diversity, non-discrimination and support to all employees. The supermarket was recognised for incorporating internal and external recruiting methods to select candidates and for nurturing the skills, confidence and leadership required to operate business functions.

“Through a commitment to staff and the community, ALDI are the pioneers in the retail sector, leaving no stone unturned,” the ARA said.

100

8.14.6. Every ALDI staff member is required to undertake detailed internal training and an induction programme, which will certainly apply for staff at the ALDI Wonthella store. This involves education on a wide variety of facets of the business and includes liquor product knowledge and responsible service. To help ensure high standards are achieved at all times, all ALDI staff are employed on a permanent basis.

8.14.7. The applicant will ensure all staff at the ALDI Wonthella store are properly trained as to their responsibilities under the Act, the licensing authority’s policies, ALDI policies and procedures, matters of safety and all other laws and regulations applicable to the proper conduct of the business.

8.14.8. The liquor section will be adequately staffed at all times with appropriately trained and knowledgeable people. In addition to having sufficient numbers of approved managers, other part-time and full-time staff will also be employed. At least one qualified unrestricted approved manager will be at the store at all times.

⁹⁶ <https://www.aldicareers.com.au/>

⁹⁷ <https://aldiaustralia-1481176-en-au.sr-atrax.com/benefits-that-matter>

⁹⁸ <https://aldiaustralia-1481176-en-au.sr-atrax.com/benefits-that-matter>

⁹⁹ <https://www.aldiunpacked.com.au/aldi-australia-is-recognised-as-an-employer-of-choice/>

¹⁰⁰ <https://insidemca.com.au/2018/10/19/aldi-awarded-ara-employer-of-the-year/>

- 8.14.9. In-store staff are required to wear a uniform, which is of a smart and modern style and bears the ALDI logo. Staff presentation is considered by the applicant to be important both in terms of upholding its image and also in portraying a professional and responsible approach to the business.
- 8.14.10. PRG found that only a mere 2% of members of the local community recently surveyed consider that harm or ill-health could be experienced by them if the licence is granted.¹⁰¹
- 8.15. Another harm minimising element of the ALDI model is the strong focus on quality of product and value-for-money propositions, not just price per se. The applicant invests enormously in providing customers with the perfect balance of high quality product at the lowest price that can be achieved whilst maintaining the quality. Many of its liquor items have been awarded accordingly. This value-for-money philosophy – which is entirely different from simple notions of low price and being cheap – is entirely consistent with consumer requirement. This latter proposition is supported by the following:
- 8.15.1. “Aldi is arguably one of the biggest disruptors to hit the Australian economy over the past 20 years, single handedly busting open the Woolworths/Coles supermarket duopoly.”¹⁰²
- 8.15.2. “Seventy-eight percent of consumers are prioritising value for money when shopping...”¹⁰³
- 8.15.3. “Almost 8 in 10 (77%) of the total ALDI shopper sample liked this [value for money pricing] aspect of the proposed Wonthella ALDI liquor section... Note the elevated for 86% and 97% respectively of packaged liquor buyers, and those who have consumed ALDI liquor products purchased from a WA ALDI store, provided a “like” response... the weight of sentiment is very much in support of this aspect of the proposed ALDI liquor section.”¹⁰⁴
- 8.16. The ALDI liquor model clearly presents with a number of low risk elements, all of which have been proven to be successful in many of its stores in other locations given ALDI's excellent trading record.
- 8.17. As referred to previously, the liquor section will be positioned away from the entrance to the supermarket, tucked-away in the corner of the store, surrounded by opaque barricading making it substantially separate and discrete. Shoppers could choose to avoid the liquor section if they so wished. The layout of the supermarket and checkouts enables any shopper to work their

¹⁰¹ PRG report at para 2.2.1, page 8

¹⁰² <https://www.macrobusiness.com.au/2021/03/the-rise-and-rise-of-aldi/>

¹⁰³ <https://ecommerceneews.com.au/story/australians-prioritise-value-for-money-as-economic-pressures-mount#:~:text=Seventy%2Deight%20percent%20of%20consumers,research%20from%20Shopify%20has%20revealed and https://retailworldmagazine.com.au/four-in-five-australians-now-prioritise-value-for-money/>

¹⁰⁴ PRG report at para 4.5.4, page 23

way through the supermarket with barely noticing the liquor component, if at all and not needing to cross through it or near it.

- 8.18. To summarise and reiterate, the following are the key harm and risk minimising features of the ALDI Wonthella liquor proposal:
- 8.18.1. Its small size
 - 8.18.2. The bright, open-plan layout
 - 8.18.3. The absence of refrigeration to help avoid impulse buying and impulse drinking. The absence of a walk-in coolroom also enhances surveillance.
 - 8.18.4. The limited stock range and volume.
 - 8.18.5. The absence of an online delivery service
 - 8.18.6. The absence of bulk quantities of cheap mainstream products.
 - 8.18.7. Reduced trading hours – significantly less than permitted under the Act and less than the usual trading hours of most other liquor stores.
 - 8.18.8. Its location/position confined within the supermarket footprint, away from the main store entrance, under the close supervision of the supermarket and its staff. ALDI staff will have a clear line of sight into the liquor display/browse area at all times.
 - 8.18.9. The restricted visibility into the liquor section.
 - 8.18.10. The lack of immediate or direct egress from the liquor area outside into the public domain. The design and layout forces customers to enter the supermarket and walk past the watchful eye of several trained staff.
 - 8.18.11. The limited and controlled nature of product pricing.
 - 8.18.12. The lack of signage external to the store advertising discounted liquor products.
 - 8.18.13. The highly experienced and reputable operator.
 - 8.18.14. The high level of staff training.
- 8.19. Importantly also, there will be none of the following:
- 8.19.1. Prominent external advertising of liquor products and their prices.
 - 8.19.2. Products, advertising or promotional materials designed to entice juveniles.
 - 8.19.3. Large volumes of cheap bulk products displayed.
 - 8.19.4. Volumes of liquor products refrigerated and ready-to-drink.
 - 8.19.5. Energy drinks stocked in the liquor display/browsing area.
 - 8.19.6. Late trading hours.

- 8.20. In respect of the issue of juveniles, very strict policies will apply. ALDI is very aware of the fact that juveniles will be in the supermarket from time to time, some of whom may be unaccompanied by a parent/guardian.
- 8.20.1. The store layout will enable juveniles to totally avoid going near the liquor section.
- 8.20.2. The combination of store layout and security systems will facilitate and ensure a constant and high degree of surveillance over the liquor area and checkout to safeguard the proper management of juveniles. ALDI has successfully managed this issue at its existing stores elsewhere in Western Australia for many years.
- 8.20.3. No liquor will be sold or supplied to juveniles or anyone who is suspected of trying to obtain liquor for a juvenile.
- 8.20.4. ALDI has adopted an "ID Under 25" policy. Staff at ALDI Wonthella will be directed to go beyond the requirement to ask customers suspected of being under the age of 18 to prove their age and in fact ask all customers suspected of being under the age of 25 for age verification, so as to err on the side of caution.
- 8.20.5. The applicant will operate under a strict policy, which will be taught to and perpetuated with its staff, whereby liquor is not sold or supplied to anyone whom it is suspected might give the liquor to a juvenile, including guardians and parents.
- 8.20.6. Juveniles observed to be loitering near the liquor block will be asked to move on and no juveniles will be permitted in the licensed area unless accompanied by a responsible adult. The applicant has not experienced notable issues of this kind at its existing stores.
- 8.20.7. Lollies and other items commonly known to attract the attention of juveniles will not be stocked in the liquor display/browse area.
- 8.20.8. The liquor display and browse area will have limited line-of-sight such that visibility into that area will be restricted.
- 8.20.9. The liquor area will be subject to a high level of surveillance and security from the relevant checkout.
- 8.20.10. Unaccompanied juveniles who may be in the supermarket from time to time will be directed to a non-licensed checkout to make their purchase.
- 8.21. A clear example to confirm ALDI's high standards in its liquor service is when the company came under scrutiny from the public for the strictness of its approach to liquor and juveniles. Some ALDI stores in New South Wales have refused service to adults because staff have witnessed a juvenile touching the liquor

items, even where they have touched the items simply to stop them from falling over in a trolley.¹⁰⁵

- 8.22. Adult consumers have felt comfortable shopping in an ALDI liquor area with their children as clearly depicted, by way of example, in the images below taken at one of the busy operating ALDI stores in WA with a liquor section¹⁰⁶.



- 8.23. Every effort will be made by the applicant to conduct business under the new licence in a manner that minimises the potential for harm or ill-health to occur as a result of the liquor store licence operating in Wonthella.
- 8.24. The applicant is an upstanding corporate citizen which operates pursuant to several high level standards and policies. ALDI has a considerable presence in the public domain, which it intends to continue growing in Western Australia. It is in the applicant's interests to ensure that the liquor service in Wonthella is successful in all respects, including genuinely minimising harm and successfully managing risks.

¹⁰⁵ <https://www.news.com.au/finance/business/retail/aldis-strict-underage-alcohol-policing-leaves-shoppers-high-and-dry/news-story/c7beaa2c4b8e1f0345b3545c98c7789c>

¹⁰⁶ Faces redacted for privacy reasons

- 8.25. The applicant has identified the issue of crime in terms of harm factors applicable to the 3km locality. Evidence of proven relevant crimes could not be found. The information contained in the attached offence data summary has been considered¹⁰⁷ which includes published police records. This police data may possibly assist in assessing very broadly and generally criminal offence activity in the area.
- 8.26. It is acknowledged that there is high level of crime occurring in the 3km locality and that Wonthella itself has a high rate. A degree of crime is to be expected given the large resident population, the intense role of the area as the capital and resource centre for the whole MidWest region, the concentration of businesses within the area and the hundreds of thousands of visitors that the area experiences each year¹⁰⁸.
- 8.27. Whilst any crime rate is an issue to be addressed, the Police data for the 3km locality may be regarded as relatively proportionate and somewhat typical given the circumstances of the area.
- 8.28. Across most of the 3km locality and in Wonthella itself, the highest type or category of Police offence recorded is “theft”¹⁰⁹. ALDI has multiple measures in place to reduce the risk of theft and is extremely experienced in the subject.
- 8.29. The applicant will maintain its tried and tested risk management, safety and security measures and implement additional steps, to minimise potential crime. These measures are addressed elsewhere in this PIA and will continue to ensure the risk of any crime associated with the premises is minimised, as it currently is. In addition, the likelihood of the liquor service contributing to alcohol related crime is reduced by the following mitigating factors.
- 8.29.1. Small, simple and open layout of the liquor block.
 - 8.29.2. Location within the confined safety of the supermarket premises.
 - 8.29.3. Lack of external frontage.
 - 8.29.4. Location of the liquor area adjacent to the checkout and therefore, under constant close staff surveillance and supervision.
 - 8.29.5. Absence of refrigeration, which removes the opportunity for impulsive desires to steal liquor for immediate consumption.

¹⁰⁷ Red Suburbs Crime Map of Australia as at mid September 2025 for the most relevant suburbs: <https://redsuburbs.com.au/suburbs/wonthella/>, <https://redsuburbs.com.au/suburbs/geraldton/>, <https://redsuburbs.com.au/suburbs/rangeway/>, <https://redsuburbs.com.au/suburbs/mahomets-flats/>, <https://redsuburbs.com.au/suburbs/karlool/>, <https://redsuburbs.com.au/suburbs/beachlands/>, <https://redsuburbs.com.au/suburbs/beresford/>, <https://redsuburbs.com.au/suburbs/mount-tarcoola/> and <https://redsuburbs.com.au/suburbs/utakarra/>. This is not evidence of proven crimes.

¹⁰⁸ As referred to in section 7 of this PIA

¹⁰⁹ <https://redsuburbs.com.au/suburbs/wonthella/>, <https://redsuburbs.com.au/suburbs/geraldton/>, <https://redsuburbs.com.au/suburbs/rangeway/>, <https://redsuburbs.com.au/suburbs/mahomets-flats/>, <https://redsuburbs.com.au/suburbs/karlool/>, <https://redsuburbs.com.au/suburbs/beachlands/>, <https://redsuburbs.com.au/suburbs/beresford/>, <https://redsuburbs.com.au/suburbs/mount-tarcoola/> and <https://redsuburbs.com.au/suburbs/utakarra/>

- 8.29.6. Lack of a walk-in cool room, which is usually hidden from staff view in most other liquor stores, providing cover and convenience for would-be criminals.
- 8.29.7. Installation of CCTV surveillance throughout the supermarket, including the proposed licensed area.
- 8.29.8. Reduced trading hours – no intention to operate late at night.
- 8.30. ALDI's considerable retailing experience, including selling liquor products, has provided the organisation with the ability to manage security well such that crime associated with ALDI stores is kept very low. The quality of the premises at the Wonthella store, both inside and outside and the standard of supervision by staff will help make the public feel welcome and safe but any would-be criminals or disorderly persons uncomfortable.
- 8.31. The liquor area will have no external access as it will be entirely confined and secured within the ALDI supermarket, set-back considerably from the main entrance.
- 8.32. The following security steps will be taken in relation to the Wonthella liquor section.
 - 8.32.1. Security cameras both inside the licensed area and outside will be operating.
 - 8.32.2. Secure locking systems will be engaged for after hours.
 - 8.32.3. A high level of staff training which includes how to deal with incidents that are, or could potentially become, obviously criminal or unsafe.
 - 8.32.4. Maintaining a rigid enforcement of harm minimisation principles and policies. These will include, for example the "ID Under 25" policy, staff training, participation in the local liquor accord (if there is one), notifying Police of potential criminal behaviour and keeping in contact with Police.
 - 8.32.5. Clear and obvious signage. The new premises will be bright, modern and attractive.
 - 8.32.6. Limited public access and egress via one point only, from within the supermarket under the constant watching-eye of the cashiers. This will ensure a high level of staff surveillance from inside the store and inhibit would-be criminals by restricting the ease of a get-away.
- 8.33. The applicant has established a Security Layout plan, illustrating the general position and fit-out of the items described above. A copy can be provided to the licensing authority on a confidential basis, if required, upon request. An advanced security and surveillance system will be installed, based on the model which has been successfully operating in the eastern states. The applicant's advanced system includes the following features:

- 8.33.1. An Access Control System as follows:
 - 8.33.1.1. 24 hour entry system to the store including interface with the security system.
 - 8.33.1.2. A tamper switch will be applied to set off the alarm in the event of unauthorised removal of the panel front covers.
- 8.33.2. CCTV system – 24-hour surveillance of the licensed area and entry and exits to the store, which will include the following:
 - 8.33.2.1. 11 active cameras will provide 24-hour surveillance with the digital video recorder.
 - 8.33.2.2. Two full body cameras located within the licensed area, one facing the checkout and another one facing the liquor shelf.
 - 8.33.2.3. The digital video recorder will be configured for motion detection to allow efficient review of any incidents.
 - 8.33.2.4. An appropriately sized hard disk will be installed to allow images to be retained on the digital video recorder for at least two weeks without greatly compromising recording quality.
 - 8.33.2.5. The CCTV flat panel monitor will be located in the office to provide real time monitoring to the store staff of the retail floor including the licensed area. This will include a play-back function.
- 8.33.3. The security system equipment will include the following:
 - 8.33.3.1. Passive Infra-Red Motion Detectors.
 - 8.33.3.2. Break glass detectors.
 - 8.33.3.3. Magnetic reed switches.
 - 8.33.3.4. Vibration detector.
 - 8.33.3.5. External strobe and siren.
 - 8.33.3.6. Security flashing lights and horns.
- 8.33.4. A back-to-base monitoring system which will raise a security alarm if the security system is armed and there is a breach. The back to base alarm will then send a patrol as well as notifying the manager, which will also activate an external strobe light and external siren.
- 8.34. The design and installation of the electronic security, access control and audible system shall comply with the requirements of all relevant standards and codes including but not limited to the following:
 - 8.34.1. Australian Standards AS/NZS 3000.

- 8.34.2. State Service and Installation Rules.
 - 8.34.3. National Construction Code.
 - 8.34.4. Local and other authority services and installation rules.
 - 8.34.5. Australian Communications Authority.
 - 8.34.6. Work Cover Authority.
 - 8.34.7. Other relevant Australian standards.
- 8.35. Of real significance is the fact that the ALDI liquor area design and layout facilitate an advanced level of security and surveillance. The store's design will make it extremely difficult for juveniles, drunk people or would-be thieves to gain access to the liquor area and go undetected. This will be achieved by virtue of the following factors:
- 8.35.1. Customers will be required to walk well into the supermarket footprint under clear view of a combination of various cameras, staff monitoring them and other customers observing.
 - 8.35.2. Customers will be required to walk through the manned and monitored checkouts in order to exit the store. There will be no quick get-away option.
 - 8.35.3. The simple small layout of the liquor area will also ensure that it is not in any way attractive for juveniles, drunk people or would-be criminals nor a temptation for impulse procurement.
 - 8.35.4. The location tucked away in the far corner of the store.
- 8.36. Further in relation to crime prevention, in the preparation of this PIA the City of Greater Geraldton's Community Safety & Crime Prevention Plan 2024-2029¹¹⁰ has been considered. The most relevant aspects of that Plan to the ALDI Wonthella proposal are in relation to principles of design which have already been factored in and supporting the Geraldton Liquor Accord which the applicant does.

9. Form 2A “Part 5 – Impact on the amenity, quiet or good order of the locality”

Form 2A “5.1 How will your premises design protect the amenity, quiet or good order of the locality?”

- 9.1. The proposed liquor section will not have any external frontage, façade or overt signage. It will be contained inside the wider ALDI Wonthella store footprint. The intended manner of trade is for the liquor service to complement the grocery and household offering from a small, discrete and segregated section within the supermarket. The premises will not operate as a stand-alone liquor outlet.

¹¹⁰ Copy available if required, upon request

- 9.2. Given these circumstances, there will be no impact on the streetscape or external physical amenity whatsoever and so the amenity, quiet and good order of the 3km locality shall be entirely preserved and protected.
- 9.3. The amenity of the 3km locality has been variously described in earlier sections of this PIA. There is a mix of land uses including residential, retail, hospitality and other commercial, civic, ocean, transport and parkland. The ALDI store is an established fixture in the area. It has been operating at the site for nearly 9 years.
- 9.4. Among the evidence of a bustling and growing area surrounding ALDI Wonthella is that of building approvals in recent years, which have significantly increased¹¹¹ and the tens of thousands of vehicles travelling past the ALDI Wonthella store on average every day¹¹² along the North West Coastal Highway "Primary Distributor"¹¹³.
- 9.5. Within this existing amenity, the ALDI liquor section will be an ideal addition from an operational perspective and in terms of enhancing services to the public. From a visual, physical or streetscape perspective, the proposed licensed area will have no impact whatsoever. It will not be seen from anywhere other than well inside the ALDI supermarket.
- 9.6. Despite the relatively tiny licensed area, of only approximately 48m² in total (inc office) the ALDI Wonthella liquor proposal will make a big and valuable contribution towards the services and facilities in the area. The expert consumer survey found that 81% of local people consider that the ALDI liquor section will not lessen the amenity of the 3km locality.¹¹⁴
- 9.7. The applicant's store is clearly visible and easily accessible from North West Coastal Highway on its western side, from both directions and supported by ample on-site parking, as depicted in the following Google Maps image:



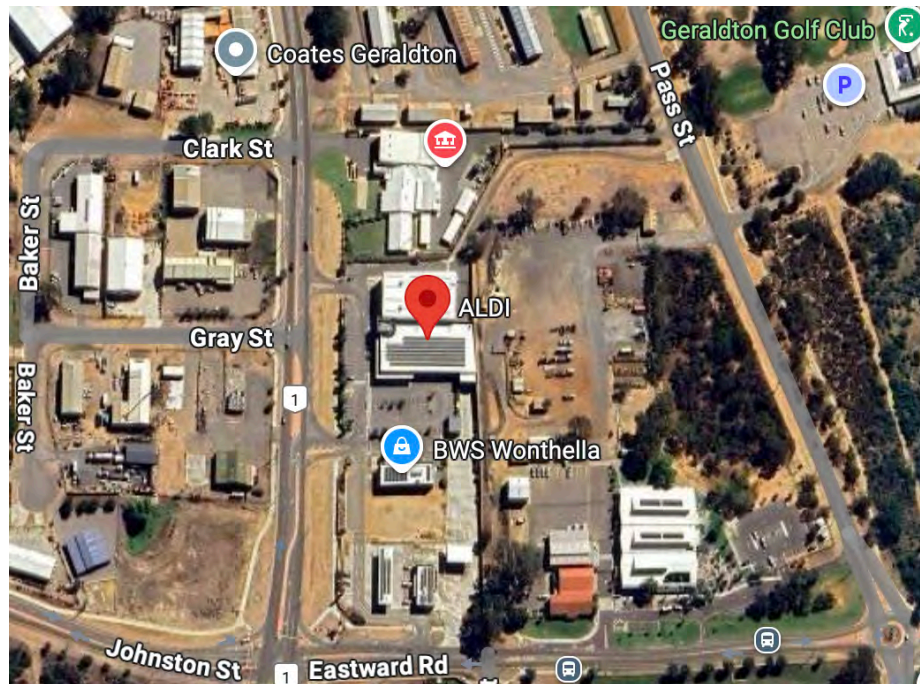
¹¹¹ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

¹¹² at the nearest published traffic recording points on North West Coastal Highway at west of Geraldton Mount Magnet Road and north of Second Street at pages 49 and 50: Statewide Main Roads Western Australia Traffic Digest 2020/21-2025/26 (copy available if required, upon request)

¹¹³ <https://portal-mainroads.opendata.arcgis.com/datasets/mainroads::road-hierarchy/explore?location=-28.776875%2C114.626784%2C17.91>

¹¹⁴ PRG report at paras 2.2.1 and 4.7 on pages 8 and 30 respectively

- 9.8. Neighbours are all commercial buildings and businesses including large format retail, as depicted by the following wider Google Maps image.



- 9.9. There are residents' homes nearby, buffered by roads and the infrastructure described above. The nearest home is believed to be approximately 220m (as the crow flies). As stated elsewhere in this PIA, the liquor section will be confined well within the wider ALDI store proper, with no street frontage or other external façade. It will be concealed. There is no park or other gathering-type place for sensitive people or at-risk groups known to be close by. The nearest resident will be much further away in reality than the 220m straight line distance.
- 9.10. Further submissions addressing the amenity issue under the Act and as referred to in the Form 2A are provided in the applicant's Legal Submissions.

10. Form 2A “Part 6 – Impact on the people who live or work nearby and whether they might suffer offence, annoyance, disturbance or inconvenience”

Form 2A “6.1 What actions will you take to minimise the impact on people who live or work nearby?”

- 10.1. ALDI has an excellent trading history. It is not known to be the cause of any offence, annoyance, disturbance or inconvenience in relation to any of its existing liquor store licences.
- 10.2. ALDI has carefully considered the impact that may be caused to people who reside or work in the vicinity of the proposed licensed premises in terms of how and in what circumstance, the sale and supply of liquor could potentially cause those people offence, annoyance, disturbance or inconvenience.

- 10.3. It is not considered that there are any high risk factors associated with the ALDI application, for the various reasons referred to throughout this PIA. Despite that conclusion, the applicant acknowledges the potential for adverse effects from any sale and supply of liquor and hence proposes to implement the following strategies to manage and minimise risks.
- 10.3.1. Maintaining a manner of trade which is low risk and low impact.
 - 10.3.2. Managing delivery times and methods in such a way as to minimise potential disturbance to others, even although there is no neighbour in close proximity.
 - 10.3.3. Implementing tried, tested and proven operational policies for overall management and conduct of business.
 - 10.3.4. Closely monitoring unaccompanied juveniles.
 - 10.3.5. Not stocking controversial liquor products and promotions designed to be attractive to juveniles.
 - 10.3.6. Maintaining a high standard of premises in terms of cleanliness, tidiness and overall quality, to indicate to patrons the operator's professional approach to management of the business.
 - 10.3.7. Employing only mature and skilled people to run the operation, all of whom will be presented in professional uniform. The staff will all be trained to be able to exhibit a high level of stock knowledge. These features will add an element of responsibility to the functioning and image of the business.
- 10.4. ALDI's advanced practises in terms of staff training will ensure that staff at ALDI Wonthella will consistently enforce and uphold the licensee's policies and philosophies for a compliant business which focuses on integrating with the local community. The applicant values its excellent reputation as an upstanding corporate citizen and employees will continue to be trained to uphold reputation and share in ALDI's core values.
- 10.5. No high risk factors associated with the liquor store proposal in this case have arisen in preparing this PIA, especially given ALDI's trading history. The small risk factor that does exist, as with any licensed premises, will be closely monitored and carefully managed in any event.

11. Form 2A “Part 7 – Impact on tourism, culture and the community”

Form 2A “7.1 Are there any tourism, cultural and community benefits that would result from the grant of your application?”

- 11.1. People living in, near and visiting the 3km locality stand to benefit enormously from the introduction of the ALDI liquor service. The public will have the demand

met and enjoy the well-known ALDI liquor products and services in their area which have been relished by other Australians elsewhere for many years.

- 11.2. The opening of ALDI stores in Western Australia has been met with great enthusiasm by customers from across the metropolitan area. When the first ALDI stores in WA started trading in June 2016, members of the public queued up for hours, in winter, before the stores opened, as seen in the photographs below¹¹⁵.



- 11.3. Clearly ALDI's positive reputation preceded itself and since then, as addressed earlier in this PIA, ALDI has grown and cemented itself in the WA market as a sought-after retailer. In the first six months of trade in Western Australia, more than 3.2 million customers were served at ALDI stores. The ALDI Cloverdale store transacted a staggering 156,338 customers in just 69 days of trading, which is an average of 2,266 customers per day.¹¹⁶
- 11.4. The licensing authority is entitled to take into account the popularity of similar services provided at other locations when assessing whether the proposed services will be in the public interest at this particular location.¹¹⁷
- 11.5. The growth and success of ALDI has resulted in tremendous employment benefits for Western Australians. The applicant currently employs approximately 1,000 people in WA. The approval of this application will generate further employment opportunities for people at ALDI which will be a most positive

¹¹⁵ <https://www.watoday.com.au/national/western-australia/keen-shoppers-brave-cold-for-opening-of-perth-aldi-stores-20160608-gpe297.html>

¹¹⁶ Evidence available if required, upon request




¹¹⁷ *Woolworths Ltd v Director of Liquor Licensing* [2013] WASCA 227 [77] (Buss JA)

impact for the local community and will answer the Geraldton Jobs and Growth Plan 2020-2023: Growing the capital of the Midwest¹¹⁸.

- 11.6. The consumer evidence in this case is clear, directly on-point and compelling. Hundreds of members of the local community have expressed a strong demand for the ALDI liquor products and service.
- 11.7. The expert market research has concluded that “[i]t is clear that the great majority of packaged liquor buyers who currently shop at Wonthella ALDI would shop for their packaged liquor requirements from the ALDI liquor section if it was established. Almost half (49%) would do so at least once a fortnight, 70% at least once a month and 92% on at least some occasions, should the liquor section be established within the Wonthella ALDI store... The clear suggestion is that the Wonthella ALDI liquor section would better meet their packaged liquor requirements than the currently available Wonthella liquor outlets.”¹¹⁹
- 11.8. Given the high level of support for the proposed liquor service referred to in the PRG report, coupled with other results in that report, including that shoppers have accessed ALDI liquor elsewhere, it can be reasonably concluded that large numbers of local shoppers are currently dissatisfied with packaged liquor in their neighbourhood because ALDI liquor is not available to them in Wonthella.
- 11.9. Further submissions referring to the consumer evidence have been provided elsewhere in this document and in the applicant's Legal Submissions.
- 11.10. ALDI is a major supporter of local communities and Australian businesses. This proposition is explained by the following published ALDI policies.¹²⁰

Good Community

We are passionate about supporting the community and giving back to those in need. We have programs in place to foster strong and honest relationships with our business partners, buyers and valued team members. Our work with Camp Quality and our food charity partners are examples of how we are making a Good Difference using the resources available to us. Learn more about how we are caring for our Good Community below.

		
Community Support ALDI connects and work with charity partners through a range of employee, business partner and customer-focused initiatives.	Food Insecurity and Food Rescue ALDI works with food rescue organisations like Foodbank and OzHarvest to get surplus food from our stores to the people who need it most. Discover our initiatives and how you can get involved.	Camp Quality ALDI has been a Camp Quality partner since May 2020, making a yearly cash donation, running employee programs, and donating proceeds from product sales.

¹¹⁸ Copy available if required, upon request (and available here:

<https://www.cgg.wa.gov.au/documents/council/strategic>

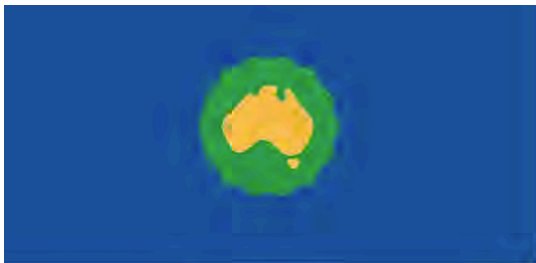
¹¹⁹ PRG report at para 4.6.3 on page 28

¹²⁰ <https://www.aldi.com.au/sustainability/good-community> (via <https://www.aldi.com.au/sustainability>), <https://www.aldi.com.au/what-makes-us-good-different> and <https://www.aldi.com.au/sustainability/good-business>



Aussie First Policy

At ALDI, we're all about homegrown goodness. In fact, 100% of our meat & eggs, 97% of fruit & veg and 82% of dairy comes from Down Under, so you know you're tucking into the taste of Good Different.



Aussie Farmers

We strongly believe in supporting Australian Made products and produce. That's why 97% of our fruit and veggies come directly from Australian farms, as well as 100% of our eggs, milk, fresh meat, fresh salmon and fresh poultry. We're also committed to supporting our Australian farmers.



Business Partnerships

When we opened our first two stores in Sydney back in 2001, ALDI initially offered a range of 600 grocery products supplied by 174 business partners. During this first year, one of these founding business partners supplied us with two types of laundry powder, which they initially delivered on a ute containing a single pallet. Fast forward to 2018, and this same business partner was supplying 75 cleaning and personal care products across 150 varieties to every one of our stores. We have hundreds of similar stories about our wonderful partnerships. With over 1000 Australian businesses now part of our network, it's easy to see how we're Making a Good Difference in more ways than one.



Economic Contribution

Data independently audited by PwC shows that ALDI had an average price gap of 15-20% in 2023, with ALDI shoppers saving \$3.4 billion on their grocery bills. But that wasn't even the most exciting part, an average family shopping at ALDI can save up to \$2,538 a year. You can access our Tax Transparency Reports below.



Modern Slavery & Human Rights

Human rights are an important dimension of ALDI's Global Sustainability Strategy, since the way we operate, purchase goods, and the business partners we choose could impact how people are treated across our operations and supply chains. As a major retailer whose supply chains touch millions of people every day, ALDI understands the importance of respecting human rights. Read more about our initiatives below.



Diversity and Inclusion

We're committed to a diverse and inclusive workforce that welcomes everyone, because we believe that understanding, respecting, and valuing the individuality of our employees and customers makes us stronger.



Responsible Business Practices

Through the responsible sourcing of our products, and prioritisation of Australian-made produce, we're helping to build resilient, thriving communities. For more information, please read our Sustainability Progress Report, which highlights how we positively impact the environment and the local communities in which we operate.

- 11.11. The grant of the liquor store licence will enhance and facilitate ALDI's increased involvement in the Wonthella community and nearby in the Midwest region. The local community will be the beneficiary of this outcome.
- 11.12. The 3km locality stands to reap many benefits from the approval of this application. The small and modest liquor service has the capacity to make a great impact in terms of choice, diversity, competition, convenience, development of the area and relevant industries and satisfying unmet consumer demand and requirement.
- 11.13. In terms of tourism, as referred to earlier in this PIA, the 3km locality attracts large numbers of visitors. The City of Greater Geraldton is an award-winning tourism destination¹²¹ with many things to see and do, events and festivals to attend and a variety of places to stay. It is described as Perth's number one day trip destination¹²². 313,000 visitors were recorded for the City in 2023¹²³. Published 2024 data reveals a total of 542,000¹²⁴.
- 11.14. The 3km locality is a cruise ship destination. "Over the 2023/24 season, Mid West Ports welcomed seven cruise ship visits, bringing a total of 8,945 passengers and crew members ashore and injecting over \$4 million into the local economy".¹²⁵
- 11.15. The approval of this application will enable ALDI to provide its full suite of products and services like it does at most of its other stores around the country and overseas, providing familiarity for tourists in the area who are accustomed to ALDI's model elsewhere. Further, the ability for ALDI to establish a full-service store will help to support and promote the 3km locality as a proper modern regional city with commonly expected retail conveniences commensurate with a location that encompasses all of the following (as referred to previously in this PIA).

¹²¹ <https://www.visitgeraldton.com.au/blog/silver-for-geraldton/15048>

¹²² <https://www.visitgeraldton.com.au/about.aspx>

¹²³ City of Greater Geraldton Overnight Visitor Factsheet 2023, Tourism WA, May 2024 (copy attached)

¹²⁴ <https://www.fra.gov.au/en/regional/local-government-area-profiles>, stated to be based on a two year average from 2023 to 2024

¹²⁵ Mid West Ports Authority Annual Report 2023/24 at page 66: <https://www.midwestports.com.au/our-port/publications/annual-reports.aspx> (copy available if required, upon request)

- 11.15.1. The city centre for the whole Midwest.
 - 11.15.2. The resource centre for the whole Midwest
 - 11.15.3. Approximately 40% of the population for the whole local government area.
 - 11.15.4. A destination for hundreds of thousands of visitors each year.
 - 11.15.5. Being hundreds of kilometres away from the next nearest resource/retail centre.
- 11.16. The ALDI Wonthella store has not kept pace with local requirements and industry trends expected in a location of its size, significance and density. Such locations ordinarily have, or are expected to have, wide choice and diversity in products and services. Approving this application will help to rectify the situation.

Form 2A “7.2 If you have any other information to provide in support of your application, include it here”

- 11.17. ALDI operates with liquor at around 350 locations across Australia. As stated previously, 36 of those are in WA. In the eastern states, nearly every ALDI store contains a liquor section.
- 11.18. The ALDI liquor model, now well-known and established in Western Australia, has been carefully designed to complement the supermarket and special buys. ALDI's particular range provides adult shoppers with superior shopping convenience through being able to access a highly diverse range of value-for-money household and consumable products at the one location.
- 11.19. There are currently 15 active packaged liquor licences to cater for approximately 15,000 people living in the 3km locality¹²⁶ plus the hundreds of thousands of visitors to the area. However, several do not sell packaged liquor at all, or in any meaningful way and only three of those licences are located within the s36B locality.
- 11.20. These numbers should be considered alongside the wide and enormous catchment of regular shoppers at ALDI Wonthella. Existing outlets do little, if anything, for shoppers at ALDI Wonthella seeking one-stop shopping and certainly do not address the demand for ALDI liquor itself.
- 11.21. The enormous number of shoppers at ALDI Wonthella each week – 8,200 on average¹²⁷ – can be considered alongside the population of the suburb of Wonthella of 1,711¹²⁸ which indicates that the ALDI store is immensely popular within the local community attracting massive numbers of people who either shop there many times a week and/or are drawn from a wider area.
- 11.22. The addition of the ALDI liquor section at the Wonthella store will, in effect, result in a self-sufficient, comprehensive retail facility. Responsible adults living locally

¹²⁶ Based on the ABS population data and Department licence information provided earlier on in this PIA

¹²⁷ PRG report at para 1.0 on page 5

¹²⁸ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635>

will be able to browse and purchase food – fresh, frozen and non-perishable – homewares, tools, gardening equipment, clothing, leisure items, sporting gear, toys, other products and liquor all with one trolley.

- 11.23. It has been identified that among ALDI Wonthella shoppers, “almost half (40%) shoppers have previously consumed ALDI exclusive liquor products that had been purchased from another WA ALDI store ...This suggests that many shoppers are prepared to go to other ALDI stores to access exclusive ALDI liquor products. Note also that an elevated 48% of packaged liquor buyers have consumed ALDI liquor products purchased in another WA ALDI store. The closest ALDI store with a liquor licence is in Yanchep, Perth, some 370 Kms away”¹²⁹.
- 11.24. This is consistent with the reports from staff at the ALDI Wonthella store to ALDI senior corporate management that they receive regular customer requests and expectation for liquor, surprise that the store does not have the feature now and dissatisfaction at having to go without out or seek the products from another ALDI store hundreds of kilometres away.
- 11.25. The following was reported in relation to ALDI recently winning the coveted Canstar Australian Supermarket of the Year for the eighth year in a row¹³⁰:
- Notoriously, Australia’s supermarket “duopoly” of Coles and Woolworths means Aussie consumers pay some of the highest grocery prices in the OECD.
- According to Canstar, the average weekly grocery bill for an Australian household of four people has ballooned to \$240, a \$24 increase from the previous year.
- The survey, which gathered insights from 2,869 shoppers, highlights the ongoing hip pocket pain facing consumers at the checkout.
- In a statement, Eden Radford of Canstar Blue told Yahoo Finance that this year’s results reflect the power of “own-brand items” in a tough economic climate.
- ‘The quality of (Aldi’s) own-brand items reliably earn the highest rating from customers,’ she said.
- ‘Consistently priced, good quality products on offer is why shoppers are choosing Aldi to do their grocery shopping.’”
- 11.26. The large majority of ALDI’s proposed liquor range at the Wonthella store will be its reliable own-brand. Approval of the licence will make quality, affordable award-winning liquor available to the local community.

¹²⁹ PRG report para 4.4.1, page 18

¹³⁰ <https://www.skynews.com.au/lifestyle/celebrity-life/customers-know-they-can-rely-on-us-aldi-crowned-supermarket-of-the-year-for-the-eighth-year-in-a-row-by-canstar-blue/news-story/a566dfe9b507fb1c0892917532618a0d>

11.27. National Liquor News reported the following statements and quotes¹³¹ which corroborate various points made in this PIA and further support the application:

- 11.27.1. "ALDI's reputation for value attracts customers, with growth outpacing the market without relying on aggressive promotions."
- 11.27.2. "In 2024, ALDI's liquor business saw significant growth, particularly in spirits, with whisk(e)y and vodka performing strongly...Paul Handley, ALDI Liquor Expert, noted the success was partly driven by increased foot traffic from ALDI's grocery offering."
- 11.27.3. "ALDI's reputation for delivering value has been key to attracting more customers to its liquor range."
- 11.27.4. "[Paul] Handley [ALDI Liquor Expert] explained that ALDI's liquor strategy sets it apart from competitors...*'We don't try to attract customers into our stores with crazy pricing to shop our liquor offer – they are already there in large numbers to do their grocery shopping. Customers know that our tightly curated range represents great value – both across the core range as well as our seasonal and specials programmes'.*"
- 11.27.5. "Amid ongoing cost-of-living pressures, ALDI is committed to offering high-quality products at competitive prices."
- 11.27.6. "As ALDI continues to innovate and focus on value, sustainability, and growth in the liquor market, it is well-positioned for further success in 2025. *'At a time when shoppers are continuously seeking better value, we have never been more aware of the need to continue to deliver on our promise to offer Aussies the highest quality products at the lowest possible prices,'* [Paul] Handley [ALDI Liquor Expert] concluded."

11.28. To further address this section of the PIA with "other information to provide in support of [the] application", as contemplated by the Form 2A the following evidence is provided:

- 11.28.1. The City of Greater Geraldton is regarded as "an emerging global city" with a "progressive community"¹³².
- 11.28.2. The 3km locality is home to a large number of significant regional events, confirming the important role of the area as a regional centre and city.¹³³

¹³¹ "ALDI's liquor growth strategy for 2025", Deborah Jackson, National Liquor News, 15 April 2025

(<https://theshout.com.au/national-liquor-news/aldis-liquor-growth-strategy-for-2025/#:~:text=Growth%20Strategy%3A%20Plans%20to%20convert.practices%20to%20reduce%20environmental%20impact.>)

¹³² City of Greater Geraldton Annual Report 2023/2024 at page 24: <https://www.cgg.wa.gov.au/annual-reports.aspx> (copy available if required, upon request)

¹³³ For example, <https://www.cgg.wa.gov.au/events/> and City of Greater Geraldton Annual Report 2023/2024 at page 6: <https://www.cgg.wa.gov.au/annual-reports.aspx> (copy available if required, upon request)

- 11.28.3. A strategic goal of the City of Greater Geraldton is to be “economically diverse and prosperous...supporting existing businesses and attracting new investment”¹³⁴.
- 11.28.4. A mammoth Geraldton Port Maximisation Project is underway¹³⁵. “Construction has begun on a new \$52 million materials handling facility at Geraldton Port, marking the beginning of a transformative infrastructure project to future-proof the port and drive economic growth in the Mid West”¹³⁶.

12. Local packaged liquor requirements - section 36B of the Act

- 12.1. Section 36B of the Act deals with packaged liquor sold and supplied for take-away purposes for consumption off the premises and it also deals with premises authorised, or proposed to be authorised, to sell and supply packaged liquor.
- 12.2. Pursuant to section 36B(1), “packaged liquor premises means premises to which a licence referred to in subsection (2) relates”. Section 36B(2) expressly states that section 36B applies to an application for a liquor store class of licence.
- 12.3. Section 36B(4) of the Act provides that “[t]he licensing authority must not grant an application to which [section 36B] applies unless satisfied that local packaged liquor requirements cannot reasonably be met by existing packaged liquor premises in the locality in which the proposed licensed premises are, or are to be, situated”.
- 12.4. Section 36B(4) “imposes a meaningful additional hurdle”¹³⁷ to the section 38 public interest test.
- 12.5. Section 36B has been said to have been intended to “enable the licensing authority to manage the number of packaged liquor outlets where sufficient outlets already exist within a locality”¹³⁸.
- 12.6. No issue arises in respect of section 36B(3) of the Act in this case. The proposed packaged liquor service will not comprise a retail area that is anywhere near the prescribed size. Therefore, the application is eligible to be heard and determined.
- 12.7. The application for ALDI Wonthella is far from a proposal for a full and traditional liquor store licence. It is a critical factor that the packaged liquor to be available will be of a discrete and limited nature. The full ambit of “liquor” and

¹³⁴ For example, City of Greater Geraldton Strategic Community Plan 2025-2035, at page 12:

<https://www.cgg.wa.gov.au/documents/council/strategic> (copy available if required, upon request)

¹³⁵ For example, <https://www.midwestports.com.au/development/projects/geraldton-port-maximisation-project-pmaxp.aspx>

¹³⁶ <https://www.wa.gov.au/government/media-statements/Cook%20Labor%20Government/Breaking-ground-on-%24350-million-Geraldton-Port-transformation---20250510>; see also

<https://www.midwestports.com.au/news/latest/breaking-ground-on-350-million-geraldton-port-transformation/10306>

¹³⁷ Liquorland Karrinyup [75] (Archer J)

¹³⁸ Explanatory Memorandum, Liquor Control Amendment Bill 2018 at page 1

traditional liquor store features will not be available in this case, whilst several alternative features will be provided.

- 12.8. The licensing authority has determined that under section 36B of the Act a packaged liquor specialist, involving a narrow and discrete range, can be approved to hold a licence for a packaged liquor premises in appropriate cases and that an application may satisfy section 36B and be granted where the particular type of packaged liquor to be sold and supplied under the licence is limited and defined¹³⁹. Most relevantly, that has included approval of ALDI licences under the current law¹⁴⁰. This present application falls squarely within that realm and is in fact a stand-out example of such an outlet.
- 12.9. With reference to the outlet density information and evidence referred to in this PIA, the relevant “packaged liquor premises” to be considered in the context of this case in terms of section 36B are submitted to be only the following three, as referred to earlier in this PIA as being located in the s36B locality:
- 12.9.1. BWS – Beer Wine Spirits Wonthella, 44 North West Coastal Highway, Wonthella – approximately 70m away (straight line)
- 12.9.2. Con's Liquor Geraldton, Lot 86 (73) Utakarra Road, Utakarra – approximately 1.1km away (straight line)
- 12.9.3. Wonthella SUPA IGA Supermarket & Cellarbrations Liquor Store, 244-252 Fifth Street, Wonthella – approximately 1.3km away (straight line)
- 12.10. None of these existing premises does, nor is even able to, sell or supply the applicant's exclusive range.
- 12.11. The existing premises collectively sell various types of packaged liquor but no ALDI products and almost 100% of their products would never be available at the ALDI store.
- 12.12. The three premises listed are brands and banner groups well known to the licensing authority, selling a range of different, mostly mainstream common, products.
- 12.13. Only the Cellarbrations outlet provides any associated supermarket convenience and so there is a community of approximately a 1.3km radius that has no one-stop shopping facility.
- 12.14. Multiple additional factors also differentiate the existing liquor models from ALDI's, as addressed earlier in this PIA. In fact, there can hardly be any proper comparison.

¹³⁹ For example, Commune Wine Store (Maylands - 60321533920), Costco Wholesale (Perth Airport - 603213623419), Costco Wholesale (Casuarina - 603217776421), Pirate Life Perth (602213750319), Cherubino City Cellar (602215063820), Kakka Alley Brewing Co (602215442820), Casa Perth (602215763420), Gage Roads Brew Co (602216177321), Mane Osborne Park (603218426322), Commune Wine Store (Subiaco - 603220029123), Rocky Ridge Duncraig (602219804523) and Mane Bicton (603221936524)

¹⁴⁰ ALDI Yancheep (603220993723), ALDI Innaloo (603222726424), ALDI Karrinyup (603222913525) and ALDI Whitfords (603222858025)

- 12.15. Based on the information provided in the preceding sub-paragraphs, it is apparent that the available packaged liquor products and services for the enormous relevant community catchment of thousands of people are extremely limited.
- 12.16. As referred to earlier in this PIA, further beyond the s36B locality are the following within the wider 3km locality and again, none of these premises does, nor is even able to, sell or supply ALDI's exclusive range.
- 12.16.1. Geraldton Hotel, 19 Gregory Street, Geraldton – approximately 2km away (straight line)
 - 12.16.2. Corcorans Geraldton Beach Hotel, 15 Fitzgerald Street, Geraldton – approximately 1.9km away (straight line)
 - 12.16.3. Cellarbrations Central / Bullseye Birdies, 41 Chapman Road, Geraldton – approximately 1.6km away (straight line)
 - 12.16.4. Liquorland Northgate Plaza, Shop 1, Northgate Plaza Shopping Centre, lot 17 Chapman Road, Geraldton – approximately 1.5km away (straight line)
 - 12.16.5. BWS – Beer Wine Spirits Geraldton, Shops 23 and 24 (lot 32) 54 Sanford Street, Geraldton – approximately 1.4km away (straight line)
 - 12.16.6. Cellarbrations at the Queens, 79 Durlacher Street, Geraldton – approximately 1.3km away (straight line)
 - 12.16.7. Geraldton Motor Inn, 107 Brand Highway, Mount Tarcoola – approximately 2.5km away (straight line) (– with Bottlemart)
 - 12.16.8. Batavia Brewing, 60 Fitzgerald Street, Geraldton – approximately 1.9km away (straight line)
 - 12.16.9. Ocean Centre Hotel, 144 Marine Terrace, Geraldton – approximately 1.8km away (straight line)
 - 12.16.10. The Murchison Tavern, 20 Chapman Road, Geraldton – approximately 1.6km away (straight line)
 - 12.16.11. Freemasons Hotel, 79 Marine Terrace, Geraldton – approximately 1.7km away (straight line)
 - 12.16.12. Olive Tree Tavern, Lot 160 cnr Place Road and Hibertia Street, Strathalbyn (conditionally granted) – approximately 2.6km away (straight line)
- 12.17. From the list above, Olive Tree Tavern, Freemasons Hotel, The Murchison Tavern and Ocean Centre Hotel currently provide no realistic take-away liquor service. There are no dedicated packaged liquor sections at these premises.
- 12.18. Batavia Brewing sells only the liquor that it produces, for take-away.

- 12.19. Therefore, there are only seven relevant existing premises within the wider 3km locality. They sell various types of packaged liquor but no ALDI products and almost 100% of their range would never be available at the ALDI store.
- 12.20. Most of the ranges and store styles comprised within the seven relevant existing outlets are well known to the Director of Liquor Licensing. They are the typical national models commonly before the licensing authority, selling beer wine and spirits from largely mainstream producers and their own home-brand within traditional format outlets with warm and refrigerated product.
- 12.21. All of those seven outlets are located variously between 1.3 to 2.5km away from ALDI Wonthella, as the crow flies, on the opposite side of North West Coastal Highway distinctly separated from the 36B locality and location of ALDI Wonthella.
- 12.22. In relation to the BWS specifically, the Liquor Commission found in ALDI Harrisdale that there “is a significant diversity between the products sold by ALDI and the BWS store.”¹⁴¹
- 12.23. The small size, layout, location, absence of coolroom, absence of prominent product advertising, absence of refrigeration, reduced trading hours at ALDI are glaring additional differences over and above the major distinction of ALDI's mainly exclusive range.
- 12.24. The following extracts of research and conclusions referred to in the expert PRG consumer survey are particularly relevant to this section of the PIA:

Buyers of take away liquor products were asked whether they believed that the proposed ALDI liquor section would be different from outlets already available in Wonthella. The question asked was:

“Do you think that the liquor service proposed at Wonthella ALDI will be different from existing packaged liquor outlets already operating in and near Wonthella?”

In the main, the sample was familiar with a typical ALDI liquor section. It may be recalled from section 4.4 that 82% of the shopper sample had previously shopped in an ALDI store that included a liquor section, and in section 4.4.1 that 40% had consumed an ALDI liquor product purchased from a WA ALDI store. So the great majority of responses to this question are based on personal exposure to the ALDI liquor offer.

It is not surprising therefore to find in the table below that almost 7 in 10 (69%) of packaged liquor buyers believe that a liquor section in the Wonthella ALDI store would be different from the current liquor outlets within the 3km locality. This proportion is slightly elevated to 74% amongst liquor buyers who have been in a licensed ALDI store, and increases to 85% amongst those who have consumed ALDI liquor products purchased in a WA ALDI store.

142

...

¹⁴¹ [43(g)]

¹⁴² PRG report at para 4.6.2 on page 27

Packaged liquor buyers were asked to estimate the extent to which they would purchase their packaged liquor requirements from a liquor section within the Wonthella ALDI store.

The question asked was:

“On average, how often would you make liquor purchases from the Wonthella ALDI supermarket?”

The table below shows the great extent to which the proposed liquor section would be used by packaged liquor buyers.

Frequency Would buy Liquor products from the ALDI Liquor Section	Packaged Liquor Buyers
Don't buy packaged liquor	1%
Once or more a week	31%
Once or more a fortnight	17%
Once or more a month	21%
Less often	23%
Don't Know	7%
Total	100%
Sample	243
Summary	
At Least 1 / fortnight	49%
At Least 1 per month	70%
At least sometimes	92%

It is clear that the great majority of packaged liquor buyers who currently shop at Wonthella ALDI would shop for their packaged liquor requirements from the ALDI liquor section if it was established. Almost half (49%) would do so at least once a fortnight, 70% at least once a month and 92% on at least some occasions, should the liquor section be established within the Wonthella ALDI store.

The clear suggestion is that the Wonthella ALDI liquor section would better meet their packaged liquor requirements than the currently available Wonthella liquor outlets.

143

- 12.25. The percentages in the results above of 49% fortnightly, 70% monthly and 92% sometimes equate to approximately 4,018, 5,740 and 7,544 shoppers respectively based on the average weekly shopper number of 8,200 at ALDI Wonthella as referred to earlier in this PIA. These are enormous numbers of likely ALDI liquor shoppers at Wonthella confirming the need and requirement.
- 12.26. The nearest ALDI liquor service for people in or near Wonthella is in Yanchep approximately 323km away (straight line). It is far from realistic or reasonable to expect those seeking ALDI liquor from the relevant area to have to travel to Yanchep.

¹⁴³ PRG report at 4.6.3, page 28

- 12.27. Given the growth and development of the 3km locality in recent years and contemporary expectations for a bustling, built-up regional city, it is essential that the community have ready access to usual modern conveniences. It is unreasonable for people living in, working in and visiting the area to be denied meaningful choice, diversity and competition.
- 12.28. It is an essential consideration in this case that “the phrase ‘requirements of consumers for packaged liquor’ in the definition of ‘local packaged liquor requirements’ in s 36B(1) of the Act is *not* limited in its scope to the physical item or product of packaged liquor”¹⁴⁴.
- 12.29. The evidence of the requirements of consumers, as referred to in this PIA, is very clearly that they require the applicant’s particular range and associated products, services and style of operation to be available to purchase for take-away purposes from the ALDI Wonthella store.
- 12.30. Almost 100% of the applicant’s stock range will be unavailable elsewhere in the 3km locality and beyond up to approximately 323km. This is a striking factor in this case.
- 12.31. To reiterate, the following are key distinguishing features of the ALDI liquor proposal:
- 12.31.1. The majority of ALDI’s products are exclusive and not available at any of the other liquor outlets.
- 12.31.2. The liquor display/browse area will only comprise only approximately 30m², which is significantly smaller than the other packaged liquor outlets. The bespoke ALDI liquor service will be an ancillary but highly valuable component of its overall service in Wonthella which is projected to be very popular and well patronised.
- 12.31.3. There will be no refrigerated liquor products at ALDI Wonthella. This is a harm minimising feature of the ALDI liquor service and speaks to its genuine intention to complement its household and grocery offering.
- 12.31.4. None of the other packaged liquor outlets can offer one-stop-shopping convenience to ALDI shoppers.
- 12.32. Further and more detailed submissions regarding section 36B of the Act are contained in the applicant’s Legal Submissions.

13. Sections 5, 33, 36B, 38 and 60 of the Act

- 13.1. Relevant provisions of the Act have been taken into consideration in the preparation of the application, including sections 5, 33, 36B, 38 and 60. Submissions addressing those and other relevant provisions in the Act have been briefly referred to in this document but are detailed in a separate set of Legal Submissions accompanying this PIA.

¹⁴⁴ Liquorland Karrinyup [108] (Archer, J)

- 13.2. It is respectfully submitted that the licensing authority should be easily satisfied that in relation to ALDI Wonthella, as was concluded in relation to other ALDI applications decided under the current law, that the applicant has far exceeded the legislative high bar because the evidence shows substantially more than “trifling” and “considerable” requirements¹⁴⁵.

14. Conclusion

- 14.1. With this document the applicant has sought to answer the Form 2A and relevant sections of the Act in full measure, with pointed reference to specifics of the application.
- 14.2. Wide-ranging public interest factors, both positive and negative, have been identified and assessed, with a resulting comprehensive proposal for the grant of the licence and ETP.
- 14.3. To reiterate, what is proposed is a modest liquor range comprising largely of award winning, value-for-money, exclusive products, through a modern one-stop-shop concept that has the potential to offer an unrivalled level of convenience for shoppers in Wonthella and has been proven very popular elsewhere. The proposal is a replica of the Australian Supermarket of the Year for the last eight consecutive years¹⁴⁶ and incorporates multiple low risk features.
- 14.4. The ALDI Wonthella liquor service will be genuinely unique, not only in the s36B locality but also in the 3km locality and far beyond for hundreds of kilometres. The products, services and style of operation at ALDI Wonthella will be very totally different from what currently exists in the local market.
- 14.5. This PIA, together with the attachments referred to within and accompanying Legal Submissions, provide strong support for the application. The evidence includes compelling expert consumer survey results showing that several thousand shopper visits are expected to the proposed liquor section regularly, including fortnightly and monthly.
- 14.6. The licensing authority should be able to find as follows in this case, just as it did in ALDI Harrisdale – which findings still have relevance in the era of section 36B of the Act – where the liquor store model in question is virtually the same:

“The granting of a licence for the selling of packaged liquor in a floor space of [43] square metres would not result in a proliferation of liquor stores within the locality or a proliferation of liquor within the locality. To the contrary, given the nature of products to be sold by the applicant it will add to the diversity of products on offer and allow greater choice for

¹⁴⁵ Liquorland Southern River [136] [137] (Lemonis J)

¹⁴⁶ <https://www.roymorgan.com/findings/roy-morgan-unveils-annual-customer-satisfaction-award-winners-across-all-categories-2023>; <https://www.skynews.com.au/lifestyle/celebrity-life/customers-know-they-can-rely-on-us-aldi-crowned-supermarket-of-the-year-for-the-eighth-year-in-a-row-by-canstar-blue/news-story/a566dfe9b507fb1c0892917532618a0d>

consumers of liquor, thus being consistent with the primary object set out in section 5(1)(c) of the Act.”¹⁴⁷

- 14.7. The 3km locality has evolved into a booming, modern regional city and yet it lacks contemporary choice and diversity in packaged liquor options, which the grant of this application can address.
- 14.8. Further submissions addressing conclusions to be drawn from the information contained in this PIA and supporting the grant of the licence and ETP as proposed are contained in the applicant's detailed set of Legal Submissions.

Dated 18 September 2025



Jessica Patterson Law & Consultancy Pty Ltd
Law practice acting for the applicant

Attachments	
No.	Title/description
1.	PRG report
2.	Offence Data Summary
3.	City of Greater Geraldton Overnight Visitor Factsheet 2023, Tourism WA, May 2024
4.	Stocklist, including identification of the ALDI exclusive products (subject to change)
5.	List of awards received by ALDI
6.	9 News Perth Facebook, 15 June 2016
7.	Legal Submissions dated 18 September 2025

¹⁴⁷ [42]



Public Interest Assessment

Form 2A

Under the *Liquor Control Act 1988* (LC Act), the Director of Liquor Licensing (DLL) has the discretion to grant or refuse any application if the DLL considers this to be in the public interest.¹ The DLL requires certain applicants to fill in this Public Interest Assessment (PIA) form and provide supporting evidence that their application is in the public interest.² If you are applying for the grant of any of the following licences, or the removal of one of these types of existing licence to another premises, you will need to complete a PIA to provide evidence that your application is in the public interest:

- hotel/hotel restricted
- tavern/tavern restricted
- liquor store
- nightclub.³

A PIA is also required if you are applying for an extended trading permit for extended hours, which has a duration of more than 3 weeks⁴, or for a temporary bar (refer to the [Temporary bars policy](#)). The DLL may also ask for a PIA to be prepared as part of any application under the LC Act, and will ask for one if it would assist in deciding whether the grant of the application is in the public interest.

The DLL will consider the following factors when determining whether granting the application is in the public interest, but this list is not exhaustive:

- the harm that might be caused due to the use of alcohol
- whether there might be a decrease in the amenity, quiet or good order of the locality
- whether people who live or work nearby might suffer offence, annoyance, disturbance or inconvenience
- how it might affect tourism, culture and the community.⁵

The level of detail required will be unique to each PIA. If you do not provide enough information, your application might not succeed or you might be asked to provide further information.

¹ LC Act s33(1).

² LC Act s38(3).

³ Liquor Control Regulations (LC Regs) r9EA.

⁴ LC Regs r9F.

⁵ LC Act s5 and s38(4).

Your completed PIA will be made publicly available and may be [advertised on the DLGSC website](#), allowing the community an opportunity to make submissions on it. Because it will be made public, do not include sensitive or personal information on this form. You can complete this PIA by taking a common-sense approach and you don't need a lawyer or a consultant to fill it in. The PIA form is a guide, and it is up to the applicant to satisfy the DLL that their application is in the public interest. If you do not have enough space, attach extra pages or prepare a separate submission. If you prepare your PIA as a separate submission, please refer to each of the question numbers on this form, so we know what question you are responding to. Lodge this form by submitting it with your application at portal.dlgsc.wa.gov.au

Part 1 — Application details

Applicant name:

ALDI FOODS PTY LTD

What licence or permit type are you applying for?

LIQUOR STORE LICENCE + ETP (HOURS - SUNDAY - ONGOING)

Are you applying for:

New licence and ETP

Removal of existing licence (which licence/permit type)

Premises trading name:

ALDI WONTHELLA

Address of proposed premises:

ALDI WONTHELLA, 46 NORTH WEST COASTAL HIGHWAY,
WONTHELLA, WA 6530

If you are lodging an application for an extended trading permit for extended hours at the same time as an application for the grant of a licence, you should submit separate PIAs for each. This is because the information required for each may be different and the DLL may approve the licence but not the extended trading hours.

Part 2 — Manner of trade

Please provide enough information for us to understand how you are intending to run your business, so we can understand the impact it will have on the community and the potential for it to cause alcohol related harm.

2.1 What is the proposed manner of trade and your target client base?

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA
PATTERSON LAW & CONSULTANCY PTY LTD

2.2 Describe the premises/proposed premises. Include a map of the locality and a floor plan detailing the nature and layout of the premises, highlighting the unique aspects of the proposed facility. What is the maximum number of patrons permitted on the premises? How will the proposed premises contribute to the streetscape and atmosphere of the area?

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

2.3 If you intend to sell packaged liquor, give the names and addresses of all existing licensed premises within the locality. The LC Act puts limitations on how many packaged liquor premises can be in a certain location. Refer to [Outlet Density — Packaged liquor premises](#) for more information.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

Part 3 — The profile of the local community

The better you capture the characteristics of the local community, the better the DLL will be able to understand the potential impact the grant of your application could have on the public interest. Your local government may have information about the area around the proposed premises, and you should seek useful data and statistics from a variety of sites, such as: www.police.wa.gov.au/crime/crimestatistics and www.abs.gov.au

You need to provide profile information from the *locality* that is within a certain distance to your intended business. If your intended business is:

- within 15km of the Perth CBD, the locality is a radius of 2km of it
- anywhere else (unless remote), the locality is a radius of 3km of it
- in a remote area, you should make a submission on what the appropriate size of the locality should be. Remote areas are those where the nearest town is at least 200km away and Perth is at least 400km away.

If you think the above definitions of locality are not appropriate for your intended business, make a separate submission on what you think the size should be.

3.1 Please outline the population characteristics in the locality. Helpful demographic information will include the total population, estimated population growth, average age, income and employment status, and the type of people who live and work in the community.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA

PATTERSON LAW & CONSULTANCY PTY LTD.

3.3 List the community buildings in the locality If any of the following are in the locality, please provide their names and addresses: schools and educational institutions, hospitals, hospices, aged care facilities, churches/places of worship, drug and alcohol treatment centres, short term accommodation or refuges, childcare centres, or a local government.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA

PATTERSON LAW & CONSULTANCY PTY LTD

- designed with sufficient parking and with good transport options available, it will allow patrons to leave the area quickly rather than potentially inconveniencing the neighbours
- provided with sound insulation sufficient for the proposed entertainment, it will prevent the surrounds from being exposed to unacceptable noise.

5.1 How will your premises design protect the amenity, quiet or good order of the locality?

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

Part 6 — Impact on the people who live or work nearby, and whether they might suffer offence, annoyance, disturbance or inconvenience

You need to demonstrate how your business will be a responsible member of the community and minimise negative impacts on the people who live or work nearby. For example, this could include:

- keeping the premises and surrounds clean and tidy, monitoring patron behaviour and discouraging anti-social behaviour
- ensuring that any entertainment is in keeping with the locality, that those present are within the allowed accommodation numbers and licensed crowd controllers are used if required
- asking departing patrons to keep the noise down so they do not disturb the neighbourhood
- being responsive to any complaints from neighbours and working with them to resolve issues.


7.2 If you have any other information to provide in support of your application, include it here.

PLEASE REFER TO THE FORM 2A ANNEXURE PREPARED BY JESSICA PATTERSON
LAW & CONSULTANCY PTY LTD

Part 8 — Declaration

I declare that the contents of this document and attachments are true, correct and complete and that I have made all reasonable inquiries to obtain the information required.

I acknowledge that under section 159 of the *Liquor Control Act 1988* it is an offence to provide false, misleading or incomplete information in this document.

 Signature of applicant/s	RADU POPESCU, ALDI REAL ESTATE DIRECTOR	31 / 12 / 2025 Date
Signature of applicant/s		Date
Signature of applicant/s		Date
Signature of applicant/s		Date



ALDI Foods Pty Ltd

**applicant for the conditional grant of a liquor store licence
and extended trading permit (hours – Sunday – ongoing)**

in respect of premises situated at

46 North West Coastal Highway, Wonthella

to be known as

ALDI Wonthella

Public Interest Assessment Form 2A Annexure

including section 36B submissions



**JESSICA
PATTERSON**

Law & Consultancy Pty Ltd
Liquor | Hospitality | Tourism | Events

Prepared on behalf of and together with the applicant by:
Jessica Patterson Law & Consultancy Pty Ltd

ACN: 648 525 204

PH: +61 409 599 093

E: jessica.patterson@jplc.com.au

www.jplc.com.au

Table of Contents

1. Executive summary	3
2. Introduction and background.....	4
3. Brief outline of the application	5
4. Applicant’s background	6
5. The liquor – ALDI exclusive products.....	14
6. Form 2A “Part 2 – Manner of trade”	18
7. Form 2A “Part 3 – The profile of the local community”	42
8. Form 2A “Part 4 – Minimising the potential for alcohol to cause harm”	51
9. Form 2A “Part 5 – Impact on the amenity, quiet or good order of the locality”	62
10. Form 2A “Part 6 – Impact on the people who live or work nearby and whether they might suffer offence, annoyance, disturbance or inconvenience”	64
11. Form 2A “Part 7 – Impact on tourism, culture and the community”	65
12. Local packaged liquor requirements - section 36B of the Act	73
13. Sections 5, 33, 36B, 38 and 60 of the Act.....	78
14. Conclusion	79

1. Executive summary

- 1.1. This application involves a proposal for an incredibly popular liquor service, to operate from a small and modest licensed area, to be located in the existing ALDI Wonthella store that already has a substantial regular patronage of over 8,000 shoppers per week on average.
- 1.2. The liquor range, comprising many award-winning products, is almost entirely exclusive to the applicant and not currently available for hundreds of kilometres.
- 1.3. Staff at the ALDI Wonthella store receive customer requests and expectation for liquor, surprise that the store does not have the feature and dissatisfaction at not being able to access ALDI liquor anywhere in the district. The nearest ALDI liquor outlet is 323km south, in Yanchep.
- 1.4. The liquor store model is well-known, sought-after by the public and has been previously approved by the licensing authority on many occasions elsewhere in the State.
- 1.5. The applicant is well-known, highly sophisticated and enjoys an excellent trading compliance record.
- 1.6. The location is well suited to the proposed liquor service and has no unusual sensitivities or overly high risks associated with it given all of the circumstances.
- 1.7. The application is strongly supported and demanded by the relevant community. Evidence of this support and demand is attached and referred to throughout this document.
- 1.8. The expert market researcher has found that “[t]he survey of Wonthella ALDI shoppers showed considerable support for and intended use of the proposed liquor section for that store”¹. The survey results reveal that thousands of shoppers are expected to purchase liquor from the little ALDI store each week if the licence is approved.
- 1.9. A demand/supply analysis of relevant factors in this case reveals that demand cannot reasonably be met by supply and so justifies the grant of the licence².
- 1.10. The application is supported by a substantial volume of compelling evidence which goes far above and beyond the level or degree of requirement capable of justifying the grant³.

¹ Survey Of The Consumer Requirement For Liquor Retailing Amongst shoppers in The ALDI Supermarket in Wonthella, by Patterson Research Group (**PRG**), dated November 2024, at section 2.0, page 6 (**PRG Report**) (attached). PRG and Jessica Patterson Law & Consultancy Pty Ltd are totally unrelated entities. The commonality of the name “Patterson” is purely coincidental.

² *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* [2024] WASC 128 (**Liquorland Southern River**) [57] (Lemonis J)

³ *Liquorland Southern River* [128] [137] (Lemonis J)

2. Introduction and background

- 2.1. ALDI Foods Pty Limited (ACN 086 210 139) (**ALDI**⁴) seeks the conditional grant of a liquor store licence and extended trading permit (**ETP**) pursuant to sections 33, 38, 36B, 47, 60(4)(g), 62, 68(1) and (2a) and 98D of the Liquor Control Act 1988 (WA)(**Act**) for a very small section of its supermarket premises already located at 46 North West Coastal Highway, Wonthella, known as ALDI Wonthella.
- 2.2. This document has been prepared as an annexure to and in accordance with the Public Interest Assessment Form 2A of the Department of Local Government Industry Regulation and Safety (**Department**) (**Form 2A**). Together they comprise the applicant's Public Interest Assessment (**PIA**). The PIA has been prepared in accordance with the Act and with reference to relevant Departmental policies.
- 2.3. As directed by the Department, the applicant has applied a "common-sense approach"⁵ to the preparation of the PIA. Further in this regard, the applicant has considered the State Government's promotion of reform in the WA liquor licensing regime to make it less complicated and "easier to do business"⁶. Therefore, the applicant has provided a level of detail considered appropriate for the circumstances in terms of the content of this document and the attachments. This approach is consistent with sections 16(7)(b) and (c) of the Act and considering that there is no minimum or threshold level of consumer requirement evidence⁷ and the ALDI offer is well known, proven to be compliant and modest. Further detail, additional copies of source material and supplementary supporting evidence can be provided if necessary.
- 2.4. Hundreds of members of the public have provided evidence of strong demand for the ALDI liquor service in Wonthella. This evidence is based largely on consumers with first-hand knowledge of the proposed liquor model. PRG found that "[m]ore than eight in ten (82%) of the Wonthella ALDI shoppers have previously been in an ALDI store that has a packaged liquor section: it is not a new concept for them"⁸.
- 2.5. The applicant is motivated and able to address the community requirement, as soon as this application is approved. The proposed licensed area can be quickly established.
- 2.6. This PIA has been formally adopted and verified by a senior representative of ALDI by way of signing the covering Form 2A.

⁴ Including related entities forming the ALDI group

⁵ Form 2A page 2 and at:

<https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

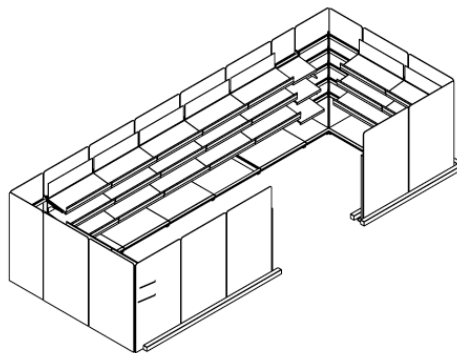
⁶ For example: <https://www.cifs.wa.gov.au/department/news/news-article/2024/08/29/liquor-licensing-policy-reform-a-big-win-for-wa-hospitality-industry>

⁷ Liquorland Southern River [126] and [128] (Lemonis J)

⁸ At para 4.4, page 17

3. Brief outline of the application

- 3.1. The applicant proposes a petite liquor display/browse and checkout section, together with a licensed office, of only approximately 48m² within the existing ALDI Wonthella store.
- 3.2. A small but carefully selected and exclusive range of unrefrigerated liquor is proposed to be available in a discrete and clearly designated licensed area under the same roof as the existing ALDI Wonthella store. The size, layout and style of operation will be almost identical to existing ALDI liquor store licences trading elsewhere in WA.
- 3.3. This liquor store model is unique to ALDI. Its various features, referred to throughout this PIA, make for a bespoke manner of trade. The boutique type of liquor service perfectly complements the diverse and popular range of ALDI's distinctive non-liquor services and facilities. This creates an exceptional one-stop shopping convenience for customers, which is a key feature of the ALDI offering. Customers can even benefit from one-transaction shopping at ALDI, thereby satisfying the growing society demand for enhanced convenience.
- 3.4. Pictured below is an aerial render that is generally indicative of what is proposed as the liquor display/browse area. The checkout is located next to the entrance that is depicted. The boundary partitioning is proposed to be made of 2.1 metre high opaque frosted glass which is depicted in the subsequent photograph.



- 3.5. Additional details of the ALDI liquor offering are provided further on in this PIA.
- 3.6. As referred to elsewhere in this PIA, the applicant consulted with local consumers and received overwhelming support. Hundreds of people have provided evidence that has encouraged ALDI to lodge this application and seek approval to provide liquor at its Wonthella store.
- 3.7. Members of the Wonthella community and other consumers in the area where the ALDI store is located, will have the opportunity to enjoy the full range of ALDI's offering, including its liquor service, if this application is approved, so as to provide them with the same valuable choice, diversity and specialty range as many other communities in Australia enjoy.

4. Applicant's background

- 4.1. ALDI operates more than 10,000 stores across 20 countries and is one of the largest and most popular retailers in the world. It has more than 570 stores in Australia.
- 4.2. The company (including related entities) has become a world-leading supermarket operator since it was founded in 1913 in Germany as a family business.



- 4.3. The following is a snapshot of the history of the organisation⁹.

"In 1913, the business was founded in Essen by the Albrecht family. Brothers Karl and Theo Albrecht's entrepreneurial journey traces back to their mother, who opened a small grocery store in 1913 in a suburb of Essen. The brothers inherited their first store from her, a resilient establishment that survived the bombings during the war...The brothers officially founded the German grocery chain in 1946. With a vision to reduce waste and costs, the brothers established a no-frills model at their discount store. They sold only non-perishable goods at affordable prices from a small, nondescript shop...The Albrecht brothers were known for their frugality. They avoided spending money on advertising or in-store decorations and were ruthless in removing poor-selling items from their

⁹ <https://sustainability.aldisouthgroup.com/about-aldi/aldi-history> (see also <https://www.aldicareers.com.au/about-aldi/>)

inventory. By keeping prices lower than competitors, the discount store earned a strong following in post-World War II Germany, where the economy had been nearly destroyed...In early 1960, the brothers officially changed the name to Aldi, short for **AL**brecht **DI**scount, reflecting the business's commitment to providing affordable products. They also split the business into ALDI Nord [north] and ALDI Sud [south]...In 2001, ALDI opened its first Australian store in Sydney" through ALDI Sud.

- 4.4. ALDI stores offer a wide range of quality products including fresh food, packaged food, other consumables and various household, garden, leisure and personal items. At most stores, liquor is also available.
- 4.5. Modern ALDI supermarkets contain around 1,350 core product lines, which is significantly less than many other supermarket operators. There are limited brand options within each different product line. For example, ALDI may offer only two or three different brands of plain flour, rather than five or more as is commonly stocked at most other supermarkets. This enables ALDI to operate from a smaller and more user-friendly footprint and with a more exclusive and carefully selected range. It also facilitates a simpler and more convenient shopping exercise for consumers¹⁰.
- 4.6. "At ALDI, we believe in making a Good Difference. As a major Aussie retailer, we are mindful of our responsibility to the environment and the communities – those who live and work in our beautiful big backyard....Our sustainability initiatives are guided by four areas of focus: Good Planet, Good Community, Good Health and Good Business¹¹...ALDI is passionate about doing Good Business. From Aussie farmers who grow our produce to the employees who stock our shelves, we're committed to supporting our partnerships. We do this through responsible practices that foster strong and honest relationships with our business partners, buyers and team members. Good Business encompasses our efforts in supply chain management, the responsible sourcing of products and more¹²...We're not like other supermarkets. We do things differently to give you the lowest possible prices on the best quality products¹³."
- 4.7. ALDI's published mission is to provide the public with exceptional product value in terms of quality for price. This is achieved through a highly sophisticated business model involving a very focused selection of products and advanced levels of systemisation and organisation designed for optimum efficiency and product control. ALDI is dedicated to maintaining consistency in its philosophy of incredibly high quality at impossibly low prices.

¹⁰ For example: <https://www.macrobusiness.com.au/2021/03/the-rise-and-rise-of-aldi/> - "In addition to its competitive prices and good product quality, I like the simplicity of Aldi. Having a small footprint and limited product choice makes shopping quick and easy. Products are always in the same spot irrespective of store, making them easy to find. By contrast, I find Woolworths and Coles too large and confusing, and I often waste time wandering aisles trying to find what I need."

¹¹ <https://www.aldi.com.au/sustainability> and

¹² <https://www.aldi.com.au/sustainability/good-business>

¹³ <https://www.aldi.com.au/what-makes-us-good-different>

- 4.8. Most of ALDI's products are exclusive to ALDI. They are often versions of mainstream big-brand name items which are manufactured according to ALDI's particular and strict specifications to ensure quality and value-for-money. Expressi Coffee is one of the most popular non-liquor examples. The Expressi Coffee capsule machine and coffee capsules have won numerous awards.
- 4.9. The majority of ALDI's exclusive products that are available in Australia are sourced from Australian suppliers.
- 4.10. Every Wednesday and Saturday "special buys" are promoted by ALDI which are specialty short-term product lines that are usually non grocery items. Flat screen televisions, furniture, clothing, appliances, BBQs, tools, gardening equipment, vacuums, camping gear and toys are just some examples. These have proven extremely popular such that customers often queue outside a store to try to access these items and then spend long periods browsing. ALDI special buys are sometimes even reported by the media as news¹⁴.
- 4.11. Some special buys are repeated occasionally but most are one-off items in limited stock so when a store sells out, the item won't be replenished.

ALDI Special Buys™

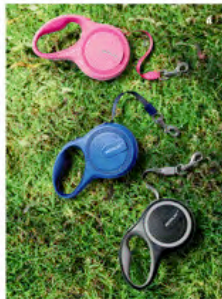
- 4.12. ALDI special buys are displayed in the now renowned middle aisle of every store. The following images show, by way of example, recent catalogue-advertised special buys.



¹⁴ For example, Chanel 7: "ALDI Australia set to bring back its wildly popular snow gear sale after two-year hiatus", 9 May 2023 (<https://7news.com.au/lifestyle/aldi/aldi-australia-set-to-bring-back-its-wildly-popular-snow-gear-sale-after-shock-hiatus-c-10571950>)

The zoomies

\$9.99



\$14.99

Quick fit harness with buckle fastening

\$11.99

\$7.99

\$5.99

\$4.99

\$19.99

A Extra Small or Small Dog Harness, Activity Lead or Rope Lead \$9.99
 Harness: Quick and easy fastening • Adjustable at neck and chest • Durable construction • Available in 2 sizes - Extra Small to fit neck 36-43cm and chest 68-75cm or Small to fit neck 38-45cm and chest 73-81cm • Assorted colours
 Activity Lead: Adjustable to fit across the body • Extends up to 100cm • Reflective stitching for nighttime walks • Assorted colours
 Rope Lead: Easy grip handle • Rope length: 120cm • Assorted colours 453032

B Medium or Large Dog Harness or Retractable Lead \$14.99
 Harness: Quick and easy fastening • Adjustable at neck and chest • Durable construction • Available in 2 sizes - Medium to fit neck 47-64cm and chest 78-95cm or Large to fit neck 59-76cm and chest 89-101cm • Assorted colours
 Retractable Lead: Extends up to 10m • Durable construction with comfortable rubberised grip handle • Easy thumb lock mechanism • Reflective tape for nighttime walks • Assorted colours 453037

C Interactive Dog Ball \$11.99
 • Includes grippy tabs and handle for easy fetch play • Soccer Ball: 15cm (S) or Football: 21cm x 16cm (M) 453033

D Active Pet Toy Assortment \$7.99
 • Assorted styles of treat-dispensing Toys or Suction Cup Slog Toys • Assorted colours 453033

E Squeaky Dog Toy \$4.99 • Features a snoring-style ratchet squeaker • Assorted colours 453037

F Heavy Duty Dog Toy \$5.99
 • Great for strong, aggressive chewers • Lightweight and soft, yet durable construction • Heads for pool and beach fun • Assorted designs and colours 453037

G Elevated Dog Bed \$19.99
 • Powder-coated steel frame • Water, oil and UV resistant • Allows pet's feet to breathe • Flow and ticks will not be on the cover • Assorted colours • Assorted sizes • Medium: 106.5cm(W) x 41.5cm(D) (M) or Large: 116cm(W) x 76.5cm(D) x 15cm(H) 646270

On Sale Wednesday 3 September

Prime grime time

\$279

ECOVACS DEEBOT
 1 Year Warranty

Automatic charging
 Dual function: vacuum or mop
 App controlled

\$249

3 modes: auto, max and suction

tineco

\$99.99

1 Year Warranty

Converts into handheld vacuum

\$149

1 Year Warranty

Compact and lightweight

Cold, hot and steam functions

\$14.99

Magnetic design allows you to clean both sides of the glass at the same time

\$29.99

Dual functions: wash or dry
 Cleans hard-to-reach places

\$13.99

3 Year Warranty

Storage box included

A ECOVACS DEEBOT NEO 2.0 Robot Vacuum Cleaner \$279 • Carpet detection • "DunkMapping" technology • App controlled • Approx. 180 minutes runtime • 4000Pa suction power • 4.0L dustbin • 4.2L water tank • Senses

B Tineco GO H2O Sense Floor Masher \$249 • Hard floor cleaner • Vacuum and clean wet and dry messes simultaneously • Cordless • Charging dock • Self-cleaning and centrifugal air drying • LED display and brushless motor • Noise alert and smart sensor • 1800W

C Carpet Vacuum Cleaner \$99.99 • Easy to empty, 2.5L dirty water tank • Stop and release foot pedal • 5m power cord 66524

D 2-in-1 Cordless Stick Vacuum \$99.99 • Cyclone technology and washable HEPA filter • 2 operating speeds • Soft-touch, rubberised handle • Includes wall mountable bracket 65879

E Carpet Spot Cleaner with Steam \$149 • 1.6L clean water tank and 1000ml dirty water tank • 2m hose 66440

F Magnetic Window Cleaner \$14.99 • Designed to clean both sides of the glass at the same time • Suitable for glass 3.8mm thick • Equipped with a safety rope to prevent cleaner from falling • Set includes magnetic window cleaner, 4 pads, spare fixing buttons and spare rubber blades • Assorted colours 65849

G Electric Scrubber Brush \$13.99 • Great for hard-to-clean areas • Interchangeable heads 65622

H Compact Tornado Mop & Bucket \$29.99 • Compact and lightweight • Multi-compartment bucket for washing and drying mop head • 2 microfiber pads included • Suitable for use on tiles, laminate and wood • Assorted colours 45849

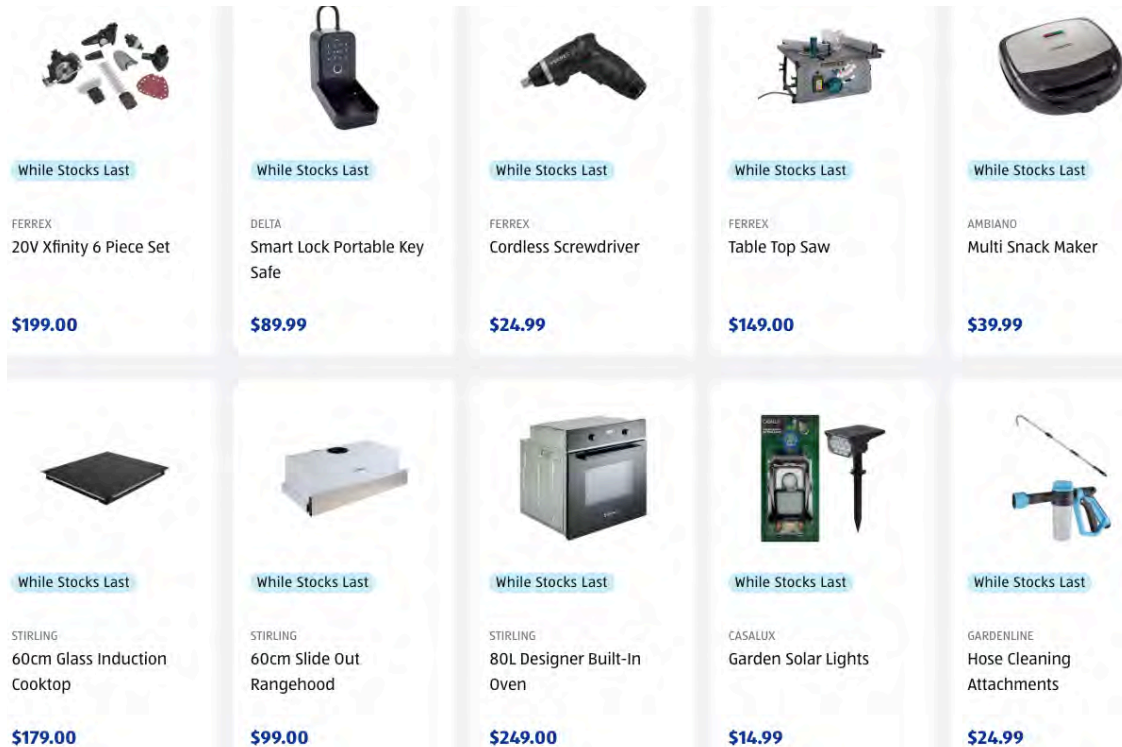
I Detail Cleaning Brush Set with Mop \$4.99 • Set includes deep clean brush, V-shaped corner edge brush with scraper, mini dustpan with scraper and soft detail brush with silicone scraper • Ideal for cleaning grout areas • Assorted colours 65849

On Sale Saturday 6 September

Public Interest Assessment
 Form 2A Annexure
 Application for liquor store licence
 and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella


















4.13. The following are further examples:



4.14. The example images above show that an enormous and diverse range of popular consumer items are commonly available at exceptional value-for-money prices. Sometimes the special buys include a small selection of liquor. The following are examples of special buys of liquor available this year.

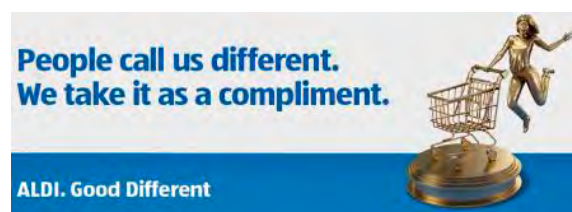
Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella

 ST HALLETT St Hallet Faith Barossa Shiraz 750ml \$14.99	 BROWN BROTHERS Winter Red 2024 Vintage \$9.99	 HIGHLAND GREEN Highland Green Blended Malt Scotch Whisky 700ml \$44.99	 WYNN'S ESTATE Coonawarra Shiraz 2023 750ml \$11.99	 LES ARGELIERES Pinot Noir 750ml \$11.99
 MOUNT LANGI GHIRAN Shiraz 2023 Vintage \$15.99	 CORTE CARISTA Montepulciano D'Abruzzo DOCG 2021 Vintage \$11.99	 THE STANDING PEOPLE Lighter in Alcohol Pinot Noir 2024 Vintage \$9.99	 DUFFEY'S Irish Whiskey 700ml \$46.99	 RESCHKE Reschke Coonawarra Cabernet Sauvignon 20... \$11.99
 PIERRE CHAINIER Vin De Sud Pinot Noir 2024 \$9.99	 FAUSTINO Faustino Rivero Ulecia Reserva 750ml \$9.99	 FOWLES WINE Fowles Vinarium Chardonnay 750ml \$14.99	 FREYA AND JULES Clare Valley Shiraz 2022 750ml \$12.99	 BEST'S GREAT WESTERN EST 1866 Bests Grampains Cabernet Sauvignon... \$14.99

4.15. ALDI prides itself on consistently competitive pricing across all of its product lines and providing customers with exceptional value-for money. The company's ability to achieve such low prices for quality products stems from its highly sophisticated business model which focuses on operational efficiency. The following are but a few examples of aspects of ALDI's in-store operations which heighten productivity, reduce waste and enable competitive value-for money pricing to be maintained.

- 4.15.1. Trolleys can only be accessed by inserting a gold coin into a particular trolley in order to be able to use it. This encourages customers to return the trolley to retrieve their coin and avoid the need for staff to spend time collecting trolleys.
- 4.15.2. Products in ALDI stores are displayed on re-usable crates, designed specifically for ALDI. The crates fit systematically in the ALDI

- Jandakot warehouse, delivery trucks and stores and can be moved from one place to another without unloading or extra-handling.
- 4.15.3. ALDI products are packaged with multiple barcodes for quick and easy scanning at the checkout with little to no time wasted fumbling to find a barcode and scan the product.
- 4.15.4. Customers are required to pack their own shopping bags at the checkout and a dedicated packing area is provided for customers. Checkout staff do not use valuable time packing bags and checkout processing is kept moving as there are no interruptions with customers holding-up the procession whilst packing at the checkout.
- 4.16. ALDI's business is highly systemised and disciplined. ALDI's shelving, storage methods, displays, product placement and other logistical aspects are designed to coordinate with each other to achieve optimum operational efficiencies. As a result, ALDI is able to reduce operating costs and provide better services and facilities for its customers.
- 4.17. ALDI does not operate by the regular retailing method of rotating discounts each day or week. Rather, prices are maintained at a consistently low level. This means that customers know what to expect when shopping at an ALDI store. It also reduces costs and resources associated with the logistics of managing specials and sales promotions which involve external advertising on site, changing ticket prices, reconfiguring product placement, adjusting till systems and other processes. ALDI does not incur all of these costs, thereby enhancing its operating efficiency.
- 4.18. Consistent pricing is also indicative of consistent quality. ALDI does not downgrade its products through heavy discounting. The applicant is driven by quality and consistency. In this regard in terms of liquor especially, ALDI's products very much represent value-for-money. High quality award winning liquor items are provided at prices accessible to most people.
- 4.19. ALDI's approach to business is neatly encapsulated in its "Good Different" slogan, which was launched in 2017. Mr Thomas Daunt, then director of the applicant company, explained this campaign as follows.
- "ALDI Australia is unapologetically different – and that's a good thing for shoppers. We are proud of our differences and we stand by them wholeheartedly, as they are what allows us to bring unbeatable value to our customers, maintain strong relationships with our suppliers and support our staff every day."¹⁵



¹⁵ <https://insidefmcg.com.au/2017/05/15/aldis-good-different-campaign/>

- 4.20. ALDI is a responsible and sophisticated corporate citizen and operates pursuant to very high standards and key performance indicators, which include the following published principles¹⁶.
- 4.20.1. Price Promise
 - 4.20.2. Aussie First Policy
 - 4.20.3. Sustainability (- Good Planet, Good Community, Good Health and Good Business)
- 4.21. ALDI is a trusted brand in Australia amongst consumers. Reputable firm, Roy Morgan, has assessed ALDI as having had a strong performance, far ahead of most other supermarkets¹⁷.
- 4.22. ALDI's pursuit of excellence and quality in all things is evident in the many awards it has won in Australia, including Canstar Blue Most Satisfied Shoppers – Supermarkets 2014-2016 and 2018-2023 and Roy Morgan Supermarket of the Year for the last eight consecutive years¹⁸. Upon winning Supermarket of the Year in 2023, "Roy Morgan's research found Aldi's average customer satisfaction score was 95.7 per cent based on face-to-face customer interactions at supermarkets"¹⁹.
- 4.23. More specifically, ALDI is also an award-winning retail liquor supplier. Among its many liquor retailing awards has been the Canstar Blue Most Satisfied Customers – Liquor Retailer 2021 and Roy Morgan Liquor Store of the Year in 2018 based on customer satisfaction.
- 4.24. Canstar Blue is a major, renowned national independent reviewer and reporter of consumer products and services "helping Australian consumers make better-informed purchase decisions on products and services by providing factual, up-to-date and well-researched comparison tables, ratings, reviews, guides and news on a range of consumer-related topics...Canstar Blue uses its wealth of consumer and expert research and data to identify outstanding brands, products, services and plans. We award these brands, products, services and plans with an award that recognises this achievement"²⁰.
- 4.25. There should be no question as to the credibility of these awards and certainly no doubt that ALDI customers are immensely satisfied with the products and services provided by ALDI which include liquor.
- 4.26. The Australian Liquor Stores Association has said that Australian "shoppers have migrated towards the value messaging of Aldi"²¹.

¹⁶ <https://www.aldi.com.au/what-makes-us-good-different>

¹⁷ <https://www.roymorgan.com/findings/9666-risk-monitor-quartely-update-june-2024>

¹⁸ <https://www.roymorgan.com/findings/roy-morgan-unveils-annual-customer-satisfaction-award-winners-across-all-categories-2023>

¹⁹ <https://www.news.com.au/finance/business/retail/aldi-named-supermarket-of-the-year-in-roy-morgans-customer-satisfaction-awards-for-fourth-year-in-a-row/news-story/66f907a7efa9941ae6fc2610bc93c65f>

²⁰ <https://www.canstarblue.com.au/about-us/>

²¹ ALSA – IRI State of the Industry Report, March 2017 at page 14 - copy available if required, upon request

- 4.27. "Our success is based on the close relationships we have with our suppliers, who all share our passion for awesome quality. Aldi partners with some of the best producers and winemakers both in Australia and internationally, which means we can deliver exceptional quality, value and consistency to our customers. Our partnerships with our suppliers are focused on a desire to see the customer win with great-tasting wines at unbeatable prices".²²
- 4.28. ALDI is a highly sophisticated and experienced packaged liquor operator, which enjoys extensive supermarket and liquor retailing experience within Western Australia, elsewhere in Australia and overseas.
- 4.29. ALDI has been operating in Australia since 2001 when the first ALDI store opened in Sydney. There are now nearly 600 stores throughout Australia, including 52 in WA. The large majority of ALDI's stores throughout the country include a liquor component. In WA there are 36 ALDI stores trading with a liquor section.
- 4.30. Over the last ten years approximately, ALDI has been undergoing a \$700 million expansion, most notably in WA and South Australia. ALDI opened its first four stores in Western Australia on 8 June 2016.
- 4.31. The ALDI liquor service was made available in WA from the end of August 2017 in five ALDI stores initially. Since then, the applicant has had an excellent compliance record across the stores now trading in WA with ALDI's specialty trademark liquor section.

5. The liquor – ALDI exclusive products

- 5.1. The ALDI range of liquor products comprises a selection of wines, beers, spirits, ciders and liqueurs. The in-store range at Wonthella will contain a carefully selected value-for-money variety of approximately 95 items, many of which are award-winning and the large majority is produced for and available exclusively at ALDI.
- 5.2. Attached is a stocklist, which varies from time to time. The stocklist identifies the items that are available exclusively at ALDI. Notwithstanding that the stocklist is smaller than most liquor outlets, it contains a wide and well-balanced variety.
- 5.3. The range changes from time to time as it adapts to new products that become available to ALDI, responds to customer requirements and when occasional specialty items are offered. Generally, the ALDI liquor service at Wonthella would include the following:
- 5.3.1. Around 60 different wines – red, white, sparkling and fortified.
 - 5.3.2. Around 15 different beers – full, medium and light strength.
 - 5.3.3. Around 15 different spirits – bourbon, brandy, gin, scotch, vodka and liqueurs.

²² Jason Bowyer, ALDI Australia's Buying Director, in response to winning the Roy Morgan Liquor Store of the Year in 2018: <https://theshout.com.au/national-liquor-news/aldi-wins-roy-morgan-liquor-store-of-the-year/>

- 5.3.4. Around 5 different ciders.
- 5.4. The applicant's product range includes Western Australian produced wines. ALDI has partnered with various wine makers from the Margaret River region to develop a selection of exclusive ALDI Margaret River region products.
- 5.5. "The driver behind ALDI's [liquor] success is Jason Bowyer who has spent most of his life in the wine trade... ALDI's formula is to deliver quality and value at prices that often make the competition wince... Jason travels the world to find wine makers he can establish long term relationships with"...including Western Australian wine makers.²³
- 5.6. In recognition of the launch of the ALDI liquor service in WA, renowned wine expert Ray Jordan was invited to sample six of the wines in ALDI's WA stores. Mr Jordan produced a media article on his tasting and remarked that one of the wines in particular, being a \$7 bottle of One Road South Australian Heathcote Shiraz 2015, was "damn good"²⁴. That Shiraz has also won several other awards, including Double Gold & Best Value Shiraz of the Year at the 2017 Melbourne International Wine Competition. This Shiraz is just one example of ALDI's many high quality, value-for-money, award winning liquor products.
- 5.7. A large number of accolades have been bestowed on ALDI for its exclusive liquor range. Attached is a list of some of the awards received. The following are just two of the numerous published reports attributed to ALDI's superior quality, award-winning products:

A bargain [ALDI](#) vodka has taken home the top award at The Spirits Business Global Vodka Masters for 2022.

The supermarket's Tamova Quadruple Distilled Vodka (700ml) retails for just \$30.99 and is made in Australia.

The affordable spirit was awarded the Master Medal by an independent panel of experts, who tasted more than 139 vodkas from 75 companies around the world.

Melita Kiely, editor of The Spirits Business, said it the recent win was an "excellent achievement" for ALDI.

"To receive any sort of medal is something that every company should be extremely pleased with, and for ALDI Australia to receive a Master medal, the highest medal we award, for their single entry within a very competitive selection is an excellent achievement," she said.

"The multi award-winning vodka, part of ALDI's everyday range, is four times distilled and traditionally filtered for exceptional purity and a clean, crisp natural flavour."

25

²³<https://www.bestwinesunder20.com.au/jason-bowyer-aldis-wine-whisperer/>

²⁴ <http://www.perthnow.com.au/news/western-australia/aldi-will-start-selling-alcohol-in-perth-stores-from-today/news-story/c59014afc215ba475dd1265a0e89eb4c>

²⁵ <https://7news.com.au/lifestyle/food/bargain-30-aldi-vodka-picks-up-top-award-at-the-global-vodka-masters-2022-c-8149807>

Aldi is your one stop shop when it comes to amazing products at low prices. From the furniture sold in the Special Buys sale to the fresh produce on the shelves, Aldi is your go-to for all things groceries and homewares. However, the German retailer has another feather to add to its cap: seller of award-winning booze.

The 2019 International Wine and Spirits Awards were held recently, and Aldi took home 13 awards.

Earning an impressive score of 95 in the cask-inish single malt scotch whiskey category, the Glen Marnoch Single Malt Sherry Cask Scotch Whiskey, which retails for just \$43, took home the gold medal and is now recognized as one of the best scotch whiskeys in the world.

The whiskey is currently only available in Aldi stores throughout NSW, however, Aldi's Highland Earl 8 Year Old Scotch Whiskey, which retails at just \$34 and came in at second place, is available Australia-wide.

26

- 5.8. One of the most unique aspects of the ALDI liquor offering is the exclusive range itself, made-to-order for ALDI stores and not available at any other packaged liquor outlet. As stated previously, the majority of ALDI's range is unique and exclusive to ALDI. Shoppers simply cannot access those items at any other non-ALDI outlet. In this case, the nearest place for shoppers to access ALDI liquor products is in Yanchep, approximately 323km away.
- 5.9. In order to become an ALDI exclusive product, the producer enters into an arrangement with ALDI whereby it is agreed that particular brands of product will not be distributed or provided to any other retailer. This confirms that ALDI exclusive products cannot be obtained anywhere other than at an ALDI store.
- 5.10. The ALDI exclusive products differ significantly from the Woolworths and Coles private-label liquor ranges. Woolworths and Coles generally purchase the whole producer entity and production facility where possible and the products from those facilities then become what are known as private-label liquor items, effectively produced by/under the direction of Woolworths and Coles or their related entities. The issue with this approach, in terms of the proper development of the liquor industry, has been well explained by David Prestipino in his article 'Winestein Uncorked: 'Local' WA wines actually owned by Woolworths, Coles'²⁷ where he described the duopoly's approach as follows:

"To avoid certain wine taxes and further boost their huge profits, Woolworths and Coles create 'wine brands' (such as the Cow Bombie) under cheeky and creative (some say misleading) names.

The wines are difficult to identify, and often undercut well-known brands, small boutique and family wineries and those struggling to find a voice in an ever-increasing crowded market.

Instead of Coles Reserve Chardonnay or Woolworths Bin 666 Cabernet, you have brands like Chateau Louise (Coles) and

²⁶ <https://www.bhg.com.au/aldi-scotch-whiskey-award>

²⁷ <https://www.smh.com.au/entertainment/winestein-uncorked-local-wines-actually-owned-by-woolworths-coles-20151211-gllhjo.html>

Augustine Wines (Woolworths) for sale...wines that are actually owned by the supermarket giants themselves.

By Developing their own private-label and exclusive wines, Coles and Woolies are now competitors to the very wineries (and consumers) they are meant to serve.

Why should this worry wine drinkers? Because not only are we losing diversity and competition as the duopoly increases its share of the wine market, but the relationship hurts independent merchants across the country, who are forced to close.

If the big chains need to move a product because it is not selling, or want to replace it for their own means, they slash the wine's price, essentially lowering the winery's brand/reputation at the same time."

- 5.11. ALDI's approach is very different. ALDI does not own the wineries, breweries and distilleries that produce its exclusive products and therefore, those independent producers are capable of producing other liquor items under different branding to sell directly to consumers themselves, or to other packaged liquor retailers. Further, whilst those producers will be required to produce a product to ALDI's standards and specifications they will, nonetheless, give input and advice into developing the products as the independent wine, beer or spirit producing expert.
- 5.12. The ALDI model does not, therefore, have the same deleterious effect on the development of the liquor industry by removing independent liquor producers from the market, but rather ALDI makes a highly valuable contribution to the industry by providing independent producers with a channel to develop and sell their wares.
- 5.13. This is one of many factors which differentiate ALDI's liquor range from the major liquor stores. The Wonthella and surrounding community will benefit greatly from having access to this special service. The role of the shopping centre site will be enhanced with the increased product diversity to be generated by ALDI's liquor service.
- 5.14. Given that the majority of ALDI's liquor range comprises ALDI exclusive products, it means that, as stated previously, the ALDI offering, overall, is unique to ALDI and simply cannot be replicated by any other licensee. The overall offering includes ALDI's liquor services which also cannot be said to duplicate any existing operation in Wonthella or up to approximately 323km nearby.
- 5.15. Within the liquor range available in any given week is a selection of new and different liquor items which change from week to week, similar to the "special buys" offer referred to elsewhere in this PIA. Approximately eight different products per week are made available to customers until the stocks are depleted and then new ones are brought in for customers, so the product selection remains fresh and vibrant.

- 5.16. ALDI's liquor range is determined following a rigorous process of elimination trialling and testing of products. Then, the items that are found to offer the very best value-for-money are selected, which necessitates identifying excellent quality. The optimum range is ultimately made available to customers. A quantity of products is stocked that is deliberately much smaller than may be found at most other liquor stores. The ALDI range is much more discerning and refined than most other packaged liquor outlets. This ensures modern consumer requirements are met whilst ALDI's principles of quality, value-for-money and great convenience are upheld.
- 5.17. An example of ALDI's liquor advertising published in a catalogue recently appears below. It is relatively modest, yet smart and stylish. The advertisement contains product information for each item, demonstrating the quality and value-for-money propositions regarding the ALDI range and the fact the range is indeed carefully selected and responsibly promoted.

Drops of wisdom

\$11.99
A

\$15.99
B

91 points

\$11.99
C

\$12.99
D

\$12.99
E

\$48.99
F

\$44.99
G

\$54.89
H

\$57.99
I

\$15.99
K

\$12.99
L

\$32.99
M

ALDI Liquor available in selected stores. See aldi.com.au for locations

A Cuvée de Nines
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

B Brachet Cuvée de Nines
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

C Passet Langi Cuvée de Nines
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

D La Mule Cuvée de Nines
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

E Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

F Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

G Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

H Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

I Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

J Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

K Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

L Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

M Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

N Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

O Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

P Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

Q Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

R Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

S Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

T Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

U Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

V Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

W Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

X Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

Y Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

Z Freya and Jules
Cuvée de Nines 2022 750ml
A classic Côtes du Rhône blend. Stunning
savory berry flavors, fresh plum, raspberry
and blackberry, with some aromatic
rosemary, lavender and thyme spice.

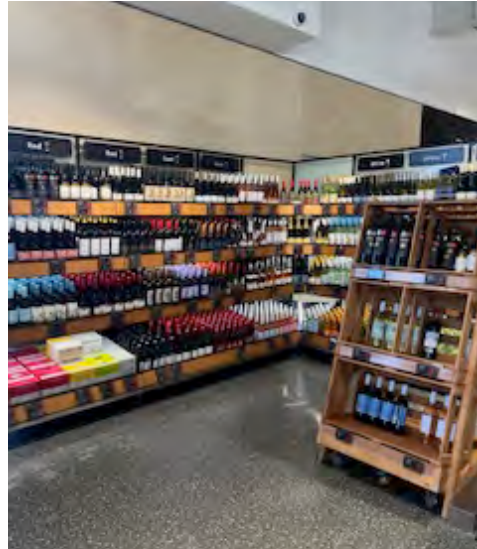
On Sale Wednesday 20 August

6. Form 2A “Part 2 – Manner of trade”

Form 2A “2.1 What is the proposed manner of trade and your target client base?”

- 6.1. This application involves a proposal to sell and supply packaged liquor on and from the premises proposed to be licensed as described above, in accordance with section 47 of the Act.

6.2. As previously outlined in this document, the applicant proposes to offer a relatively small and mostly exclusive selection of carefully selected, value-for-money non-refrigerated beer, wine and spirits (including a range of beer, wine and spirit varietals, cider and sparkling). The images to the right and below depict a typical ALDI liquor section which will be established in Wonthella if the licence is granted.



6.3. The low-level free-standing temporary displays, as depicted in the following image, may be placed in different positions within the small liquor block.



- 6.4. The applicant seeks approval for the same licence, in respect of the same business model and on the same terms and conditions as approved on 38 previous occasions in WA.
- 6.5. ALDI Wonthella currently operates as follows (with variations for public holidays):
- Monday: 8.30am to 8.00pm
 - Tuesday: 8.30am to 8.00pm
 - Wednesday: 8.30am to 8.00pm
 - Thursday: 8.30am to 9.00pm
 - Friday: 8.30am to 8.00pm
 - Saturday: 8.30am to 5.00pm
 - Sunday: 11.00am to 5.00pm
- 6.6. The liquor service will operate within these time periods, but subject to trading hours permitted under section 98D the Act and as may be approved under section 60(4)(g).
- 6.7. The applicant seeks approval for the standard trading hours permitted under section 98D of the Act, namely 8am to 10pm Monday to Saturday and 12 noon to 10pm on ANZAC Day (except no trading on Good Friday or Christmas Day). The applicant also seeks approval pursuant to section 60(4)(g) of the Act for an ETP to authorise trading from 10am to 10pm on Sunday. However, the actual opening times of the liquor section are proposed to be the usual ALDI store trading hours, as stated above (except no liquor trading before 12 noon on ANZAC Day or any time on Good Friday or Christmas Day). When the ALDI supermarket is not trading, the liquor display/browse area would be closed off to customers and if the ALDI store is open for trade at times not permitted under section 98D or 60(4)(g) of the Act, the liquor area will also be closed to the public. Therefore, overall, ALDI's proposed liquor trading hours are much less than potentially permitted under the Act and much less than most liquor stores.
- 6.8. The applicant invites the licensing authority, if it considers appropriate, to impose the following special trading conditions that are imposed on ALDI's existing licences in WA:
- 6.8.1. The licensee is prohibited from selling refrigerated liquor products.
 - 6.8.2. There is to be no external advertising of liquor products on the façade of the licensed premises.
 - 6.8.3. The browse/display area is to be closed off when not open for trade.
 - 6.8.4. The licensee is to have and maintain a CCTV system in accordance with the policies of the Director of Liquor Licensing.
 - 6.8.5. The liquor display and sale area must be separated from the food/grocery display and sale area by barricading of non-see-through material over two (2) metres in height.

- 6.8.6. The entry/exit point to the licensed area must have a gate.
- 6.9. There are many aspects to the ALDI liquor model which differ from virtually all other non-ALDI packaged liquor outlets anywhere and which are most certainly totally different from the existing outlets relevant in this case. The following are key unique aspects of the ALDI liquor model, which will apply at Wonthella, should the application be approved:
- 6.9.1. ALDI exclusive product range.
 - 6.9.2. Combination of the ALDI liquor service with the ALDI non-liquor store elements. A one-stop-ALDI shopping convenience.
 - 6.9.3. One transaction convenience.
 - 6.9.4. Its small size and location under the supermarket roof.
 - 6.9.5. Small, carefully curated selection of liquor with no bulk displays.
 - 6.9.6. Absence of refrigeration.
 - 6.9.7. Absence of external presence of the liquor section.
 - 6.9.8. The particular level of surveillance of the display/browse area which can be seen and monitored by staff at all times in its entirety.
 - 6.9.9. Restricted visibility into the liquor section as a juvenile risk management feature.
 - 6.9.10. Combined beneficial effects of the features listed above which are supplemented by the overall manner of trade and harm minimisation features identified.
- 6.10. In regard to the “target client base” referred to in the Form 2A:
- 6.10.1. Principally, the ALDI target client base for the proposed liquor service is existing customers of the ALDI Wonthella store who are demanding that ALDI liquor be made available to them there, of which there are an average of over 8,000 per week²⁸. The next nearest ALDI liquor service is in Yanchep, approximately 323km away (straight line).
 - 6.10.2. The target client base also comprises other people in and around Wonthella including those driving past along the North West Coastal Highway through the region. Tens of thousands of vehicles travel past the ALDI Wonthella store on average every day²⁹. North West Coastal Highway, upon which the ALDI Wonthella store is situated, is a “Primary Distributor” in the Main Roads WA hierarchy and a State Road³⁰ of approximately 1,320km in length, distributing traffic through

²⁸ PRG report at page 5

²⁹ at the nearest published traffic recording points on North West Coastal Highway at west of Geraldton Mount Magnet Road and north of Second Street at pages 49 and 50: Statewide Main Roads Western Australia Traffic Digest 2020/21-2025/26 (copy available if required, upon request)

³⁰ <https://portal-mainroads.opendata.arcgis.com/datasets/mainroads::road-hierarchy/explore?location=-28.776875%2C114.626784%2C17.91>

the Mid-West and Pilbara regions. These classifications mean that, among other things, North West Coastal Highway has a high degree of connectivity, connects with other primary distributors and has a “predominant purpose...for movement of inter regional and/or cross town/city traffic”³¹. Further, it is a “principle/major route for high volume traffic movements within large urban areas”³².

- 6.11. ALDI operates a friendly, inclusive and welcoming store and will continue to do so if the licence is granted. Any adult may potentially visit the liquor section and shop there provided only that they comply with ALDI's conditions of entry that apply to anyone and any legal requirements by which ALDI needs to abide.
- 6.12. ALDI enjoys enormously favourable community sentiment and support. Its stores have huge popularity and significant regular custom. Some customers are so passionate about ALDI that they developed their own private Facebook page/group named, Aldi Fans Australia, dedicated to information for ALDI lovers. This is not an official ALDI media source and yet it has approximately 105,000 members³³. ALDI's official Facebook page has nearly 900,000 “followers”³⁴. This medium is the modern-day voice of the public and therefore, represents significant community sentiment.
- 6.13. The first two ALDI applications for liquor store licences in WA were initially refused at first instance³⁵ (and subsequently approved). Soon after the initial refusals, a massive 8,637 people took it upon themselves to participate in an Internet survey conducted by Nine News Perth³⁶ which asked: “Do you think ALDI should be banned from selling alcohol because it's too cheap?”. Within just two days 7,428 people who participated (86%) answered “no”. Importantly, this survey was conducted without any involvement from the applicant. It was completely unsolicited. It is indicative of ALDI's significant popularity in the WA community.
- 6.14. ALDI has been under pressure for some while from local residents to provide a liquor service at the Wonthella store. They know about other ALDI stores offering liquor and want Wonthella to do the same. Customers seeking the liquor service have expressed confusion and frustration as to why other ALDI locations offer liquor but the Wonthella store does not.
- 6.15. The applicant engaged independent expert market research firm, PRG³⁷, to conduct a survey and to subsequently provide a report of the results which is referred to throughout this document. Some of the results in the PRG report evidencing clear and strong demand for the ALDI liquor proposal from the 303 people surveyed, include the following:

³¹ Main Roads WA Road Hierarchy for WA Road Types and Criteria (copy available if required, upon request)

³² Section 13(2)(e) and (3)(d) of the Main Roads Act 1930

³³ <https://www.facebook.com/groups/117155111252/>

³⁴ <https://www.facebook.com/ALDI.Australia/>

³⁵ Decision of Director of Liquor Licensing: ALDI Harrisdale (A000187300) and Decision of Director of Liquor Licensing: ALDI Joondalup (A000191943)

³⁶ 9 News Perth Facebook, 15 June 2016, printout attached

³⁷ Experience, expertise and methods are referred to on pages 2, 5 and 11; Also: <https://marketresearch.com.au/>

- 6.15.1. “Seventy-six per cent of all shoppers, and 87% of packaged liquor buyers support the establishment of a liquor section within the Wonthella ALDI store”³⁸.
- 6.15.2. “A significant majority of respondents indicated that the key liquor store attributes that would be provided in an ALDI Liquor section appealed to them. The fact that 82% of shoppers had shopped in an ALDI store that included a liquor section, adds some weight to these observations.”³⁹
- 6.15.3. “Well in excess of 9 in 10 “experienced shoppers” agree...that:
- ALDI liquor sections have good quality products,
 - the products represent good value for money,
 - the liquor section is convenient for shoppers. (sic) and
 - 85% agree that they have many brands and products not available elsewhere (other than another ALDI store)”⁴⁰
- 6.15.4. “[A]lmost 9 in 10 shoppers (85%) like the notion that the liquor section would be located within the Wonthella ALDI store.”⁴¹
- 6.15.5. 62% of packaged liquor buyers in the PRG report and of those, 84% who have consumed ALDI liquor products purchased from a WA ALDI store, said in the consumer survey that they like the specialist ALDI liquor range proposed for the Wonthella store⁴². PRG concluded that “[i]t is clear that the weight of opinion is very much supportive of this aspect of the proposed Wonthella ALDI liquor section”⁴³.
- 6.15.6. “Almost 8 in 10 (77%) of the total ALDI shopper sample liked [the value for money pricing] aspect of the proposed Wonthella ALDI liquor section... elevated [to] 86% and 97% respectively of packaged liquor buyers, and those who have consumed ALDI liquor products purchased from a WA ALDI store....the weight of sentiment is very much in support of this aspect of the proposed ALDI liquor section”.⁴⁴
- 6.15.7. “More than 8 in 10 (83%) of the total Wonthella ALDI shopper sample liked [the one-stop shopping convenience] aspect of the proposed liquor section... There is an elevated 91% and 98% respectively of packaged liquor buyers and those who have consumed ALDI liquor products purchased from a WA ALDI store”.⁴⁵

³⁸ PRG report at para 2.2 on page 7

³⁹ PRG report at para 2.3, page 9

⁴⁰ PRG report at para 4.4.2, page 19

⁴¹ PRG report at para 4.5.1, page 20

⁴² PRG report at para 4.5.2, page 21

⁴³ PRG report at para 4.5.2, page 21

⁴⁴ PRG report at para 4.5.4, page 23

⁴⁵ PRG report at para 4.5.5, page 24

6.16. The PRG report has been compiled by an extremely experienced expert. Such evidence was found by the Liquor Commission in *ALDI Foods Pty Ltd v Director of Liquor Licensing LC 09/2017 (ALDI Harrisdale)* to be “gold standard”⁴⁶.

Form 2A “2.2 Describe the premises/proposed premises”

6.17. ALDI stores generally comprise a total footprint of approximately 2,000m². Some are located within shopping centres while others, like the Wonthella store, are free-standing. This store – pictured on the cover page of this document – has been running for nearly seven years. It operates from within a modern, single storey building.

6.18. Consistent with other ALDI stores, the following different parts or areas comprise the Wonthella outlet, listed in order of size in terms of the approximate portion of the total footprint:

6.18.1. Main public retail area (non-liquor) – displaying grocery, other supermarket items, homewares, clothing, furniture, tools and other non-grocery items.

6.18.2. Storage.

6.18.3. Loading dock/delivery area.

6.18.4. Entrance and trolley bay.

6.18.5. Checkout.

6.18.6. Office and staff facilities.

6.18.7. Liquor display and browse area (proposed).

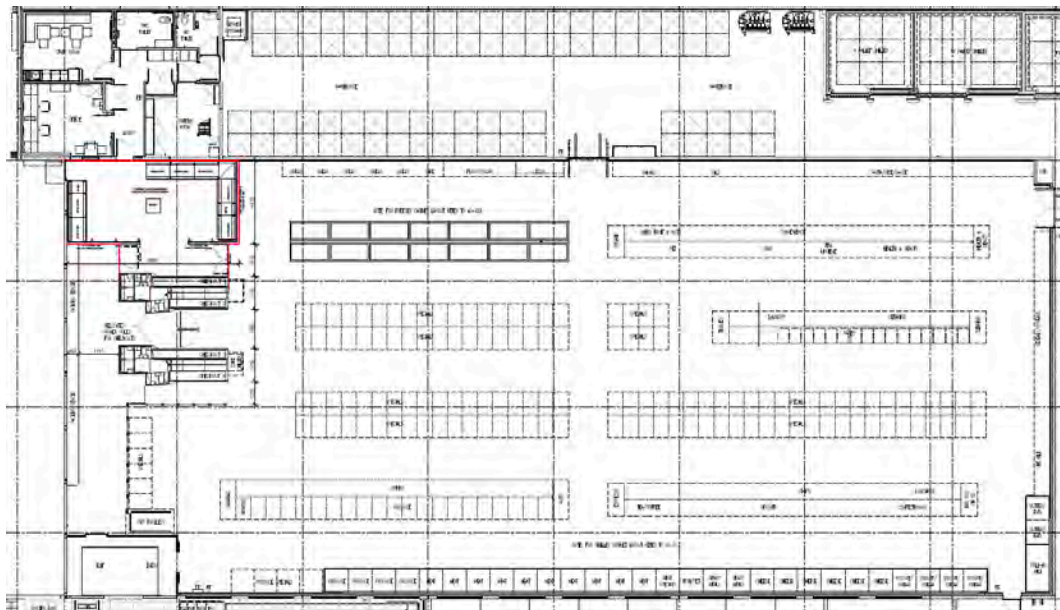
6.19. The store also has its a dedicated, spacious parking area at the front door, with nearly 100 bays.

6.20. ALDI stores are bright, fresh and pleasant shopping environments. The following images depict the stylish and crisp appearance that can be found at the ALDI Wonthella store:



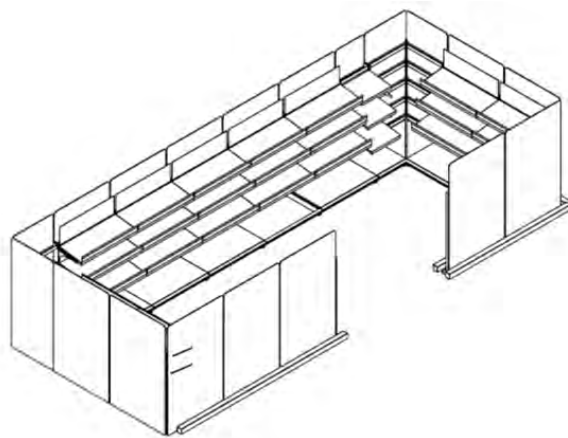
⁴⁶ Hearing 22 February 2017, transcript at page 45

- 6.21. ALDI operates a generic store modelling concept. The size, layout, colour, product location and stock range of each ALDI store are almost always the same. Minor differences may occur from time to time at some stores owing to land formation, town planning requirements or other unique particulars of the site. For example, the entrance door may be positioned a few metres away from its usual position at a particular location.
- 6.22. The standardisation of store layouts engenders familiarity for customers, enhances shopping comfort, efficiency and convenience. It also enables customers to rely on consistency of style, standard and overall offer. Importantly, these are key features of the applicant's successful superior efficiency model of operation which benefits customers enormously and is clearly popular with shoppers.
- 6.23. The layout of the ALDI Wonthella store is pictured below in an extract from the applicant's floor plan lodged with the application. It shows the proposed licensed area outlined in red, which includes both liquor display/browse and checkout, with a combined area of approximately 30m². This is clearly a tiny proportion of the overall footprint. The office is also sought to be licensed to house the required licensing documents and to accommodate the approved manager from time to time.



- 6.24. The display/browse space is a simple rectangular shape as depicted in the image above which will be clearly delineated in the same manner as existing ALDI licensed stores. This design is based on many years of experience and enables convenience and a high level of surveillance of the area. The display/browse area will also comfortably accommodate shoppers with their trolleys.

- 6.25. The checkout closest to the liquor display/browse area is proposed to be licensed for the purposes of the liquor transactions. Staff operating at this checkout will be able to monitor all patron activity in this area.
- 6.26. The very small size and layout of the liquor display/browse area clearly confirms that the liquor section is a complementary and ancillary service to the rest of the ALDI Wonthella store and will help ensure the area is well-controlled and supervised.
- 6.27. As set out earlier on in this document, the following aerial render is indicative of the proposed sectioned-off liquor display/browse area, which is to be established if approved. The boundary partitioning is intended to be made of 2.1 metre high opaque frosted glass designed for the purpose.



- 6.28. The following photograph of the approved liquor section at the ALDI Yanchep store, by way of example, which is the area behind the frosted glass and the checkout just in front of it, is indicative of what is proposed to be established at Wonthella:



- 6.29. The position, layout and small size of the liquor section will enable very clear and uninterrupted visibility and supervision of the display/browse area. These features assist with security, surveillance, management and control by staff.
- 6.30. Thoroughly trained and suitably qualified staff members over the age of 18 will be positioned at the licensed checkout at all times, where they will be able to see directly into the whole liquor area. Such constant and close surveillance is rarely achieved at most other liquor stores due to their size, layout and walk-in cool rooms. Further details of the applicant's well developed risk management measures, which include a heavy emphasis on staff training, are set out further on in this PIA.
- 6.31. The liquor area will be entirely confined well within the ALDI supermarket building and have no access directly into, or visibility from, outside of the ALDI store. In fact, the liquor section will have even limited visibility from within the ALDI supermarket. It will be positioned on the opposite side of the store from the main entrance, next to the office, so as to reduce visibility and enhance the separation from the rest of the store. The liquor section will be discretely tucked-away into the corner, as depicted below at the end of the far-end aisle.



- 6.32. Signage external to the licensed premises may be displayed which is subtle, modest and states simply that there is "liquor available in store". Such signage will not contain images of liquor products, references to particular liquor products or prices of liquor products. The following is an example of the innocuous type of external signage that may be displayed.

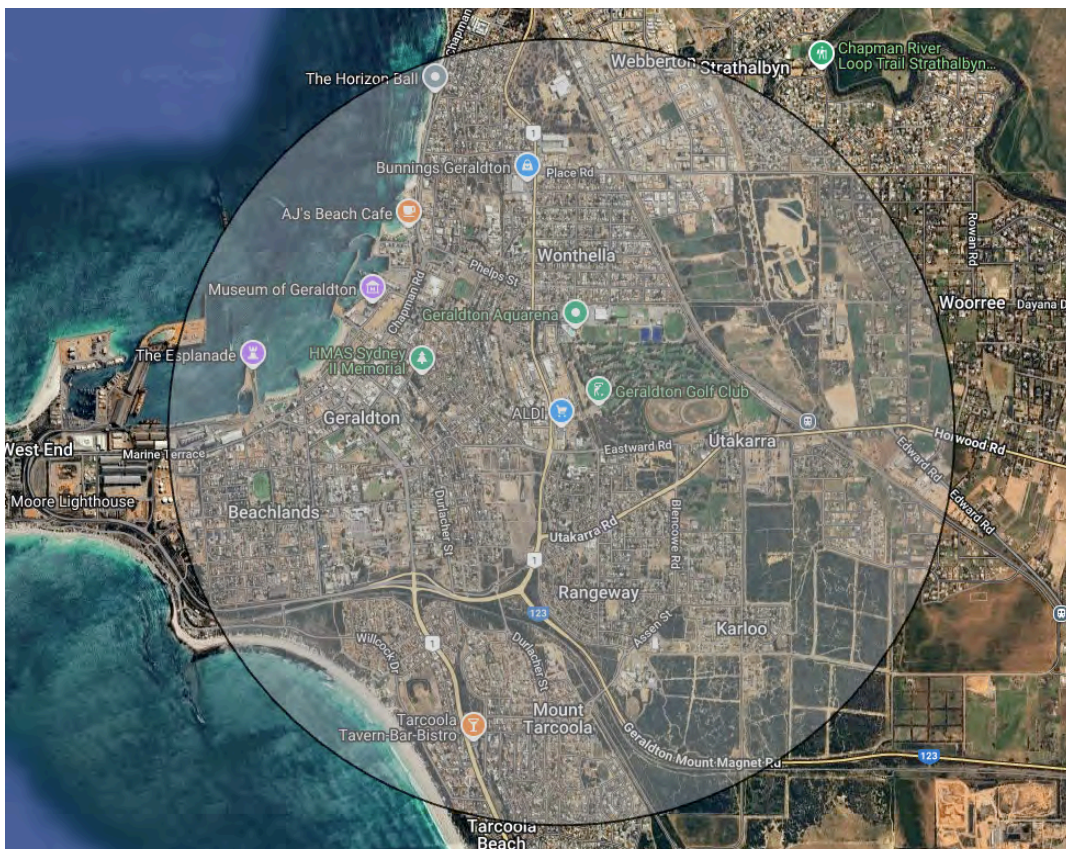
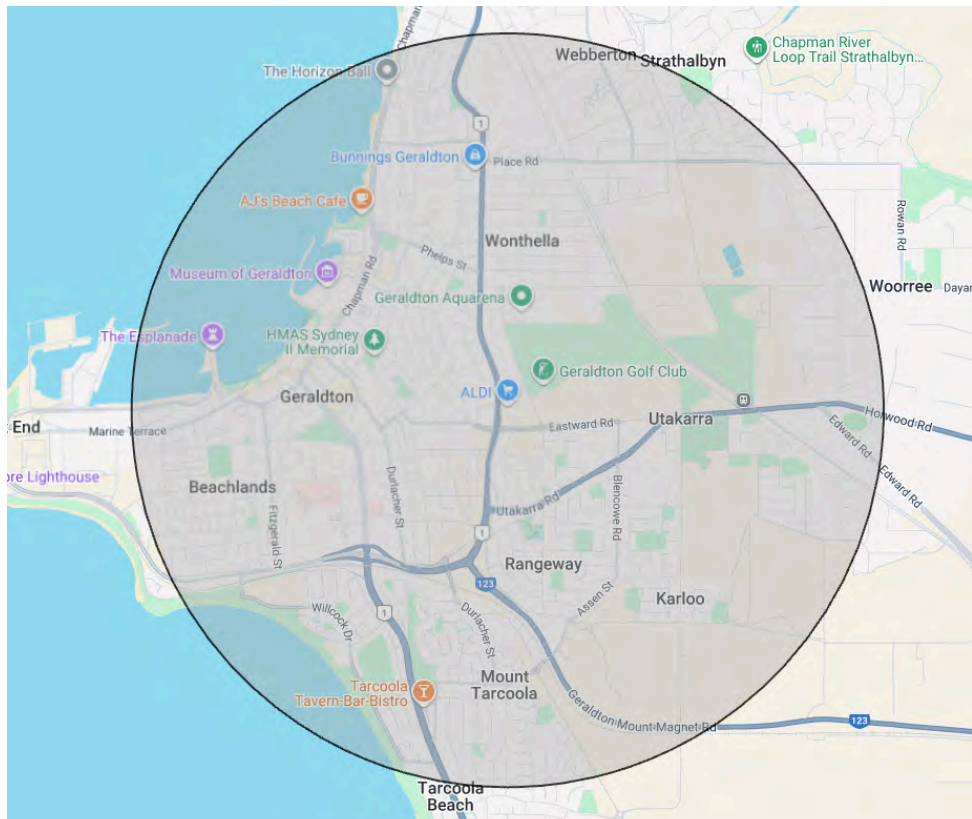


- 6.33. There will be no cool room or other refrigeration in the liquor area. All products will be stocked and sold at room temperature. This unique feature further confirms the intention that the liquor service is genuinely designed to complement the other household items being sold and provide a one-stop-ALDI shop, not an impulse buying service designed to accommodate quick drinking.
- 6.34. As stated previously, the office inside the ALDI Wonthella store is proposed to be licensed for the main purpose of storing licensing-related documents including the approved plans, harm minimisation plan, incident register and staff training register. From time to time, the approved manager may be positioned inside the office.
- 6.35. The applicant intends to store liquor in the back-of-house storage area of the ALDI Wonthella supermarket and also at the applicant's distribution centre in Jandakot. No sale or supply of the liquor directly to customers will take place from the storage facilities.

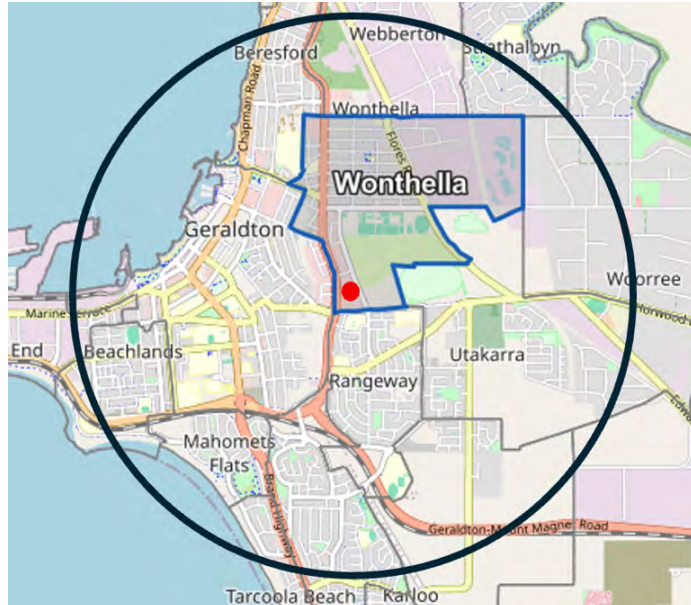
Form 2A: “2.3 If you intend to sell packaged liquor, give the names and addresses of all existing licensed premises within the locality”

- 6.36. To address this point in the Form 2A, it is necessary to firstly identify the relevant locality. There is no definition of “locality” in the Act.
- 6.37. The ALDI Wonthella store is located approximately 370km from the Perth CBD (north). In the Form 2A, the Department has suggested that the locality for this case may be a 3km radius around the proposed licensed area. That area is depicted in the Google Maps images below (**3km locality**).

Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella



6.38. The following Google Maps image shows the suburb of Wonthella outlined in blue⁴⁷ in the context of the 3km locality shown as the black radius. The central red dot indicates the approximate location of the ALDI Wonthella store:



6.39. The whole of the 3km locality is within the City of Greater Geraldton local government area, in the Mid West region of the State, approximately 420km north of Perth.

About GREATER GERALDTON

Located 419 kilometres north of Perth, Greater Geraldton is a thriving city with a population of over 40,000. The Midwest is recognised as having the most diversified economy in the state through industries including mining, fishing, aquaculture, agriculture, manufacturing, construction, retail and tourism. With the best of coastal and rural living and stunning weather year round, Greater Geraldton is a truly perfect place to visit and to make home. Geraldton's coastline is a huge tourist attraction and has beautiful foreshores to match. Other attractions include the iconic Point Moore Lighthouse, the HMAS *Sydney II* Memorial and the Houtman Abrolhos Islands which are located 80km off the coast of Geraldton. Greater Geraldton also incorporates the towns of Mullewa, Walkaway and Greenough. World renowned for water sports, Geraldton lends itself to some of the most spectacular kite surfing, windsurfing, fishing and diving conditions to be found anywhere.

48

Geraldton

In Geraldton, it's all about the lifestyle! It's what brings people to Geraldton and what makes them stay. Nestled along Western Australia's stunning Coral Coast, Geraldton offers a Mediterranean climate with mild winters averaging 20°C and warm summers peaking around 33°C - perfect for beach lovers and outdoor enthusiasts alike.

Whether you're into water sports, fishing, wildlife encounters with friendly sea lions, or simply soaking up the sun on world-class beaches, Geraldton's turquoise waters and white sands are a magnet for visitors from around the globe.

But the magic doesn't stop at the shoreline.

49

⁴⁷ <https://www.abs.gov.au/census/find-census-data/search-by-area>

⁴⁸ City of Greater Geraldton Annual Report 2023/2024 at page 4: <https://www.cgg.wa.gov.au/annual-reports.aspx> - copy available upon request if required

⁴⁹ <https://www.cgg.wa.gov.au/live/my-home/about-greater-geraldton.aspx>

6.40. “In Geraldton it is all about the lifestyle! It's what brings people to Geraldton and what makes them stay. With a beautiful Mediterranean climate, the sun shines almost all the time. In winter the temperature averages around 20C and 33C in summer. It makes for the perfect beach lifestyle and Geraldton's stunning coastline attracts people from all over the world. Whether it is water sports, a spot of fishing, saying hello to our friendly Sea Lions or just to relax – our beaches are world-class.

In addition to the spectacular turquoise water and white sandy beaches, Geraldton has a booming café and restaurant scene. Marine Terrace's West End has cemented itself as a go-to for locals and visitors alike with the popular strip featuring great coffee, food and retail. Not to mention Geraldton's array of cuisine and dining options which feature local produce.

Alongside Geraldton's many food choices are the retail options. With extended trading hours, Geraldton has a large range of shopping options from many local stores and boutique brands to larger nation-wide franchises.

While Geraldton is classed as a “regional city”, we have an amazing cosmopolitan lifestyle with an array of modern bars and nightlife to match.

You will never be short of anything to do with an ever-growing events and entertainment scene. With everything from live music, theatre, comedy, dance, Fringe Festivals, Geraldton is cementing itself as a leader in entertainment in WA. In addition, to add to that, our arts and culture scene has it all. From galleries, history, street art and a lot more!

Not just our beaches and stunning Foreshore, but we are home to the magnificent HMAS Sydney II Memorial, Western Australian Museum, the Saint Francis Xavier Cathedral, Seal Rock, live lobster factory, the Point Moore Lighthouse and the phenomenal Houtman Abrolhos Islands located just off the Geraldton coast.

A total of 122 islands make up the pristine Houtman Abrolhos Islands located just 60km off the Geraldton coast. They are accessible via aircraft and boat. Diving, fishing, snorkelling, photography and bird watching - the Abrolhos Islands are truly spectacular.

We are also a central hub for people to explore the attractions of the wider Midwest region including the Mullewa Wildflowers, the amazing Kalbarri Gorges and Skywalk, the Pink Lakes and the array of beaches up and down the coast.

Many base themselves in Geraldton to explore the wonders of the Coral Coast, as we know – there's so much to discover!”⁵⁰

6.41. The suburb make-up of the 3km locality may be described by the following table which lists all or parts of the suburbs that fall within the 3km locality.

⁵⁰ <https://www.visitgeraldton.com.au/about.aspx>

Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella

Suburb	Estimated % of the developed and populated part of the suburb that falls within the 3km locality	Estimate % of the 3km locality that is covered by the suburb area
Wonthella	100%	12%
Geraldton	100%	12%
Rangeway	100%	8%
Mahomets Flats	100%	5%
Karlooloo	99%	10%
Beachlands	99%	5%
Beresford	95%	7%
Mount Tarcoola	90%	7%
Utakarra	80%	12%
Webborton	55%	8%
Strathalbyn	40%	2%
Tarcoola Beach	35%	2%
Woorree	25%	7%
West End	10%	2%
Narngulu	1%	1%
		100%

6.42. For the purposes of this PIA, statistical information is provided mainly for the suburbs of Wonthella, Geraldton, Rangeway, Mahomets Flats, Karlooloo, Beachlands, Beresford, Mount Tarcoola and Utakarra as they are considered the most relevant in this case based on the percentage estimates in the table above. Statistical information for the other suburbs listed has not been closely assessed for the purposes of this PIA on the basis that to do so would likely distort the overall picture given the small portions relevant to the 3km locality.

6.43. Key physical features of the 3km locality, which can be clearly seen in the maps above and other images and information in this PIA, North West Coastal

Highway, Geraldton-Mount Magnet Road, the connection between those arteries and the western side, railway line, coastline, industrial and light industrial areas, residential areas and undeveloped land.

- 6.44. “[T]he word ‘locality’ in s 36B denotes an area that surrounds, and is geographically close to, the location of the proposed premises”⁵¹.
- 6.45. “Given the context and purpose of s 36B, the word ‘locality’ is intended to connote the same concept of neighbourhood. I consider that, in this context, it means the geographical area surrounding the proposed site. Section 36B seeks to add an additional hurdle before a licence may be granted under which packaged liquor can be sold. It seeks to ensure that there are not multiple premises in close proximity to one another selling packaged liquor.”⁵²
- 6.46. “This is not to say that the ‘locality’ will inevitably, or even usually, be a circular area within a particular radius of the proposed site. The shape and size of the ‘locality’ may be influenced by topographical features (including man-made features such as roads) and the areas from which the proposed site could be accessed reasonably easily on foot or push-bike. If there is a community in the area of the proposed site, the geographical spread of that community may also influence the shape and size of the ‘locality’”⁵³.
- 6.47. “[D]ue to the variety of factual situations that may arise, it is impossible to prescribe a specific test to be applied or even an exhaustive list of the factors that will or may be relevant in the determination of the locality in any given case. As has been observed in other jurisdictions, there will be some cases where it will be easy to determine the locality, and other cases where it will not be. An example of the former would be where the proposed premises was to be placed in a small country town. An example of the latter would be where it was to be placed in the CBD.”⁵⁴
- 6.48. “What constitutes a ‘locality’ relates to the geographical area surrounding, and what is relatively close to, the proposed site”⁵⁵.
- 6.49. “In any event, the factors which can be contemplated in deciding ‘locality’ must remain diverse and fluid and it is contemplated that the Director may impose different localities in respect to different applications, provided that, in the interests of natural justice, such decision is made on reasonable and ascertainable grounds”⁵⁶.

⁵¹ *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* [2021] WASC 366 (**Liquorland Karrinyup**) [181] (Archer J); confirmed in *Liquorland Southern River* [62] (Lemonis)

⁵² *Liquorland Karrinyup* [182] (Archer J); confirmed in *JB Foods Pty Ltd v Commissioner of Police* [2022] WASC 352 [15] (Smith J) and *Liquorland Southern River* [62] (Lemonis)

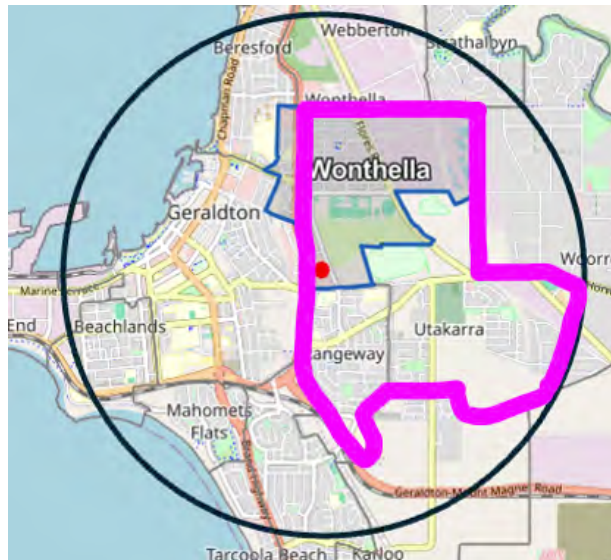
⁵³ *Liquorland Karrinyup* [185] (Archer J); confirmed in *JB Foods Pty Ltd v Commissioner of Police* [2022] WASC 352 [16] (Smith J) and *Liquorland Southern River* [62] (Lemonis)

⁵⁴ *Liquorland Karrinyup* [186] (Archer J); confirmed in *Liquorland Southern River* [62] (Lemonis)

⁵⁵ *JB Foods Pty Ltd v Commissioner of Police* [2022] WASC 352 [14] (Smith J); *Liquorland Karrinyup* [186] and [190] (Archer J)

⁵⁶ *Endeavour Group Limited v Director of Liquor Licensing and ors* LC07/2023 at [164]; *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* LC09/2023 [92]

- 6.50. “The imposition of a radius circle is not necessarily appropriate where such the same encompasses an artificial area. To adopt a patently artificial radius does not reflect the licensing authority’s mandate to have regard to the primary objects of the Act and the functions of the licensing authority which require consideration of the actual impacts of a proposed application”.⁵⁷
- 6.51. For the purposes of section 36B of the Act and having regard to the findings of the Court in *Liquorland Karrinyup*, upheld in *Liquorland Southern River*, the applicant submits that the relevant locality in this case is a portion of the 3km locality. It is proposed to be the suburbs of Wonthella, Rangeway and Uta Karra that are on the eastern side of North West Coastal Highway, up to the 3km locality boundary. This area is depicted in the following map in thick **bright pink outline (s36B locality)**.



- 6.52. The proposition for the area highlighted in pink above as the s36B locality is based on the following reasons:
- 6.52.1. This area “surrounds and is geographically close to the location of the proposed premises”⁵⁸, which are key locality defining criteria.
 - 6.52.2. The area proposed as the s36B locality is a local neighbourhood⁵⁹.
 - 6.52.3. The ALDI liquor display and browse area will be a tiny space with no visibility whatsoever external to the ALDI store. In fact, the liquor section will only be visible from well within the ALDI supermarket. When this is considered in the context of the surrounding area it is clear that the size of the ALDI liquor section is even further reduced in scale. Having regard for these factors, it could be artificial to extend the relevant locality to an area wider than the s36B locality. This

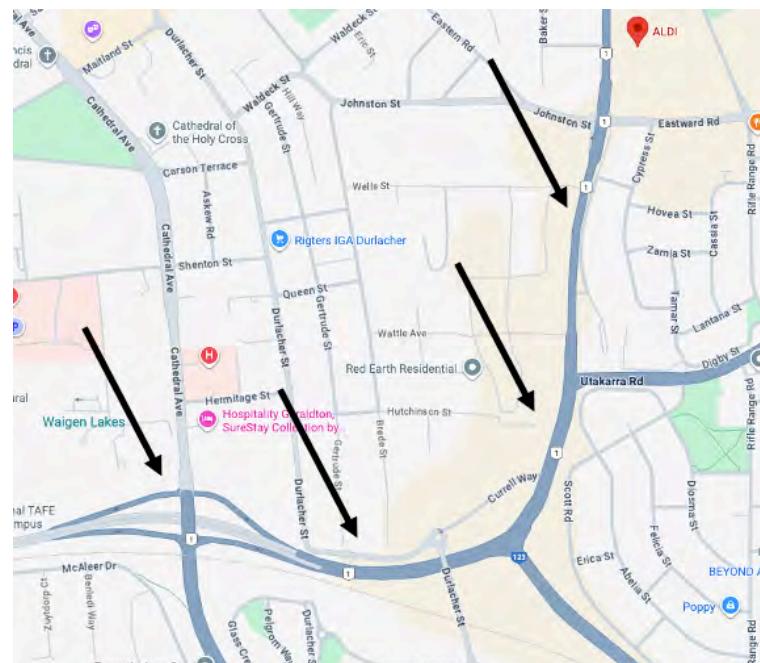
⁵⁷ *Endeavour Group Limited v Director of Liquor Licensing and ors* LC 07/2023 [172]; *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* LC 09/2023 [99]

⁵⁸ *Liquorland Karrinyup* [181] (Archer J)

⁵⁹ *Liquorland Karrinyup* [182, for example] (Archer J)

proposition is supported by the obiter dictum of Lemonis J in *Liquorland Southern River* at [65].

6.52.4. North West Coastal Highway is a notable delineation and demarcation. In addition, its enormous physical amenity presence, it demands considered time and effort to be traversed. Where it connects with other nearby main arteries of Geraldton Mount Magnet Road, John Willcock Link, Cathedral Avenue and Brand Highway there is a major, elaborate highway intersection and bridge system comprising multiple lanes and entries and exists going various directions. The following Google Maps images depict aspects of these factors. The location of ALDI Wonthella is shown by the red balloon at top right.



- 6.53. Having regard for sections 16(7)(b) and (c) of the Act, the Department's "common-sense approach" policy⁶⁰ and the State Government's published desire to make it less complicated and easier to do business in the WA liquor industry⁶¹, the assessment of locality in this PIA is not exhaustive. The applicant has provided a level of detail considered appropriate for the circumstances in terms of the content of this document and the attachments. Further detail, additional copies of source material and supplementary supporting evidence can be provided if necessary. The applicant has had regard for the decision in Liquorland Karrinyup and the fact that the 3km locality and s36B locality are both very established and presumably the licensing authority is properly familiar with them and so only pertinent locality material has been included⁶².
- 6.54. The following images depict aspects of the area immediately surrounding ALDI Wonthella:



⁶⁰ Form 2A page 2 and at:

<https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

⁶¹ For example: <https://www.cits.wa.gov.au/department/news/news-article/2024/08/29/liquor-licensing-policy-reform-a-big-win-for-wa-hospitality-industry>

⁶² Further detailed information and supporting documents can be provided if required, upon request

Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella



Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
and extended trading permit (hours – Sunday - ongoing)
ALDI Wonthella



6.55. The following images depict aspects of the wider area on the western side of the 3km locality⁶³:



6.56. Further particulars regarding the s36B locality and 3km locality are provided elsewhere in this PIA. They are both well established areas which are presumably known to the licensing authority. The applicant has carefully considered both the 3km locality and s36B locality, as referred to throughout this document and the accompanying Legal Submissions.

⁶³ City of Greater Geraldton Annual Report 2023/24 (<https://www.cgg.wa.gov.au/annual-reports.aspx>) at cover page,

- 6.57. As required by the Form 2A, the applicant provides the following “names and addresses of all existing licensed premises within the [s36B] locality”⁶⁴ – the “packaged liquor premises”⁶⁵ are identified in **bold**:
- 6.57.1. Geraldton Golf Club, 30 Pass Street, Geraldton
 - 6.57.2. Geraldton Districts Italian Sporting & Social Club, Eighth Street, Wonthella
 - 6.57.3. La Fiamma Sporting Club Inc, Salvatore Sciuto Park, Eighth Street, Wonthella
 - 6.57.4. Geraldton Softball Assn Inc, cnr Flores and Antares Roads, Geraldton
 - 6.57.5. Geraldton Rovers Soccer Club Inc, Reserve 32023 Alexander Street, Utakarra
 - 6.57.6. Rover Football Club Inc, Eastwood Road, Utakarra
 - 6.57.7. **Con’s Liquor Geraldton**, Lot 86 (73) Utakarra Road, Utakarra
 - 6.57.8. Geraldton Turf Club, 71 Eastward Road, Utakarra
 - 6.57.9. **BWS – Beer Wine Spirits Wonthella**, 44 North West Coastal Highway, Wonthella
 - 6.57.10. **Wonthella SUPA IGA Supermarket & Cellarbrations Liquor Store**, 244-252 Fifth Street, Wonthella
 - 6.57.11. Club Wonthella, Eight Street, Wonthella
 - 6.57.12. Towns Football Club Geraldton Inc, Eighth Street, Wonthella
 - 6.57.13. Theatre ‘8’, 228 Eighth Street, Wonthella
 - 6.57.14. Mid West Irish Club Inc, cnr Fourth and Howard Streets, Wonthella
 - 6.57.15. Geraldton Hockey Assn Inc, 258 Eighth Street, Wonthella
 - 6.57.16. Geraldton & Districts Badminton Assn Inc, Eighth Street, Wonthella
 - 6.57.17. Geraldton Amateur Basketball Assn, Activewest Stadium, 238 Eighth Street, Wonthella
 - 6.57.18. The Geraldton Squash Rackets Association (Inc), 288 Eighth Street, Wonthella
 - 6.57.19. Geraldton Tennis Centre Inc, 256 Eighth Street, Wonthella
- 6.58. Additional information and submissions regarding the three “packaged liquor premises”⁶⁶ listed above are provided further on in this document.

⁶⁴ Based on information published by the Department as at 5 September 2025, listed in the order as appears in the Department’s database for each suburb: <https://portal.dlgsc.wa.gov.au/forms/fr/search/findallicence/new>

⁶⁵ As defined in section 36B of the Act

⁶⁶ As defined in section 36B of the Act

- 6.59. Beyond the s36B locality, are the following existing licensed premises which are all located at least 1.3km away⁶⁷, most around 2km, again with the “packaged liquor premises”⁶⁸ identified in **bold**:
- 6.59.1. 30knots Distillery, 166 Chapman Road, Beresford
 - 6.59.2. **Geraldton Hotel**, 19 Gregory Street, Geraldton
 - 6.59.3. **Ocean Centre Hotel**, 144 Marine Terrace, Geraldton
 - 6.59.4. **Corcorans Geraldton Beach Hotel**, 15 Fitzgerald Stret, Geraldton
 - 6.59.5. **The Murchison Tavern**, 20 Chapman Road, Geraldton
 - 6.59.6. **Freemasons Hotel**, 79 Marine Terrace, Geraldton
 - 6.59.7. **Cellarbrations Central / Bullseye Birdies**, 41 Chapman Road, Geraldton
 - 6.59.8. **Liquorland Northgate Plaza**, Shop 1, Northgate Plaza Shopping Centre, lot 17 Chapman Road, Geraldton
 - 6.59.9. **BWS – Beer Wine Spirits Geraldton**, Shops 23 and 24 (lot 32) 54 Sanford Street, Geraldton
 - 6.59.10. The Geraldton Club, 160 Marine Terrace, Geraldton
 - 6.59.11. Geraldton Bowling Club, Onslow Street, Geraldton
 - 6.59.12. Geraldton Yacht Club, Marine Terrace, Geraldton
 - 6.59.13. Railways Football Club Geraldton Inc, Recreation Ground, Augustus Street, Geraldton
 - 6.59.14. Emerald Room Restaurant, Hospitality Inn, Cathedral Avenue, Geraldton
 - 6.59.15. Ibis Styles Geraldton, Brand Highway, Geraldton
 - 6.59.16. Dome Geraldton, Lot 506 Foreshore Drive, Geraldton
 - 6.59.17. Smokin Grill and Burgery, Shop 2, Post Office Plaza, 52 Durlacher Street, Geraldton
 - 6.59.18. L'Italiano – Pizza, Pasta & Gelato, 1 Fitzgerald Street, Geraldton
 - 6.59.19. The Vibe Nightclub Geraldton, 38 Fitzgerald Street, Geraldton
 - 6.59.20. Queens Park Theatre, Cathedral Avenue, Geraldton
 - 6.59.21. Central Regional TAFE – Zeewijk Training Restaurant, 173 Fitzgerald Street, Geraldton
 - 6.59.22. Geraldton City RSL Sub Branch Club, 46 Chapman Road, Geraldton
 - 6.59.23. Eureka Promotions Inc, 100 Flores Road, Geraldton

⁶⁷ Based on information published by the Department as at 5 September 2025, listed in the order as appears in the Department's database for each suburb: <https://portal.dlgsc.wa.gov.au/forms/fr/search/findallicence/new>

⁶⁸ As defined in section 36B of the Act

- 6.59.24. Tarcoola Park Tennis Club Inc, 14 Glengarry Court, Mt Tarcoola
- 6.59.25. The Provincial Café and Bar, 167 Marine Terrace, Geraldton
- 6.59.26. Skeetas Restaurant & Café, 219 Foreshore Drive, Geraldton
- 6.59.27. The Mad Mexican, 79 Durlacher Street, Geraldton
- 6.59.28. **Batavia Brewing**, 60 Fitzgerald Street, Geraldton
- 6.59.29. **Cellarbrations at the Queens**, 79 Durlacher Street, Geraldton
- 6.59.30. The Gerald Apartment Hotel, 25 Cathedral Avenue, Geraldton
- 6.59.31. Hog's Breath Cafe - Geraldton, Suite 3, 30 Chapman Road, Geraldton
- 6.59.32. Laian Restaurant and Café, 56 Cathedral Avenue, Geraldton
- 6.59.33. Brown Boys Curry House Midwest, 54 Sanford Street, Geraldton
- 6.59.34. Orana Cinemas - Geraldton, 229-235 Marine Terrace, Geraldton
- 6.59.35. Piper Lane Café, 158 Marine Terrace, Geraldton
- 6.59.36. The Foreshore Hangout Lounge, 36 Foreshore Drive, Geraldton
- 6.59.37. Blue Heelers Square, 181-195 Marine Terrace, Geraldton
- 6.59.38. **Geraldton Motor Inn**, 107 Brand Highway, Mount Tarcoola
- 6.59.39. **Olive Tree Tavern**, Lot 160 cnr Place Road and Hibertia Street, Strathalbyn (conditionally granted)
- 6.59.40. African Reef Beach Resort, 5 Broadhead Avenue, Tarcoola Beach

7. Form 2A “Part 3 – The profile of the local community”

Form 2A: “3.1 Please outline the population characteristics in the locality”

7.1. From the 2021 Census, the ABS recorded the following numbers of people living in the suburbs reflected in the 3km locality relative to the estimated portions of each suburb that are developed and populated within the 3km locality.

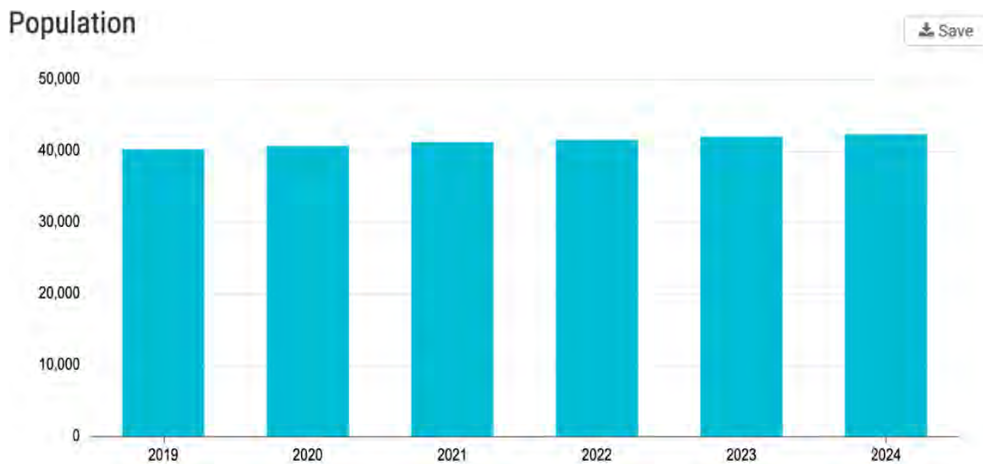
	Total 2021 suburb population ⁶⁹	Portion estimated within the 3km locality ⁷⁰
Wonthella	1,711	1,711
Geraldton	3,246	3,246
Rangeway	1,871	1,871
Mahomets Flats	806	806
Karlooloo	495	491

⁶⁹ ABS 2021 Census: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50536> (Geraldton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51280> (Rangeway), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50880> (Mahomets Flats), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50730> (Karlooloo), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50084> (Beachlands), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50112> (Beresford), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51036> (Mount Tarcoola) and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51486> (Utakarra)

⁷⁰ As described/explained earlier on in this PIA

Beachlands	1,400	1,386
Beresford	1,463	1,390
Mount Tarcoola	3,257	2,932
Utakarra	1,467	1,174
Collective total estimated to be living within the 3km locality at that 2021 Census		15,007

- 7.2. On the basis that at the 2021 Census 39,489 people were recorded as living in the City of Greater Geraldton⁷¹, the 3km locality represents approximately 40% of the total local government area.
- 7.3. In addition to the resident population are tourists and other visitors to the area, as are referred to elsewhere in this PIA and who comprise hundreds of thousands of people per year⁷².
- 7.4. The City of Greater Geraldton has published more recently that it is “[h]ome to 42,322 people, Greater Geraldton supports 17,998 jobs and has an annual economic output of \$8.259 billion...The mining industry sector makes the greatest contribution to economic output in the region, which at \$1.4 B accounts for 17.3% of total output...With 3,126 jobs representing 17.37% of total employment, it is the health care and social assistance industry sector that is the region’s largest employer”⁷³.
- 7.5. There has been slight but steady population growth, partly illustrated by the following graph⁷⁴:



- 7.6. Building approvals have significantly increased since 2022, as illustrated by the following⁷⁵:

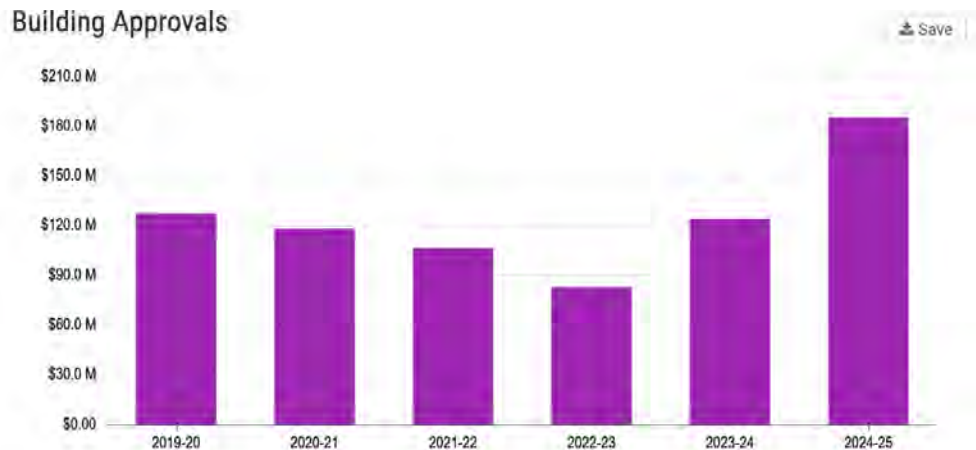
⁷¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA53800>

⁷² City of Greater Geraldton Overnight Visitor Factsheet 2023, Tourism WA, May 2024 (copy attached)

⁷³ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁷⁴ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁷⁵ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>



7.7. The following “population characteristics of the locality”⁷⁶ have been identified for people living in the 3km locality⁷⁷. Statistics for the whole of WA have been provided for comparative and contextual purposes.

	Wonthella	Geraldton	Rangeway	Mahomets Flats	Karoo	WA
Aged 19 and under	21.6%	19.7%	30%	23.2%	33.8%	23.9%
Aged 65 and over	21.3%	28%	14.4%	15.4%	12%	16.1%
Aboriginal and/or Torres Strait Islander	10.6%	8.6%	22.1%	8.8%	22.2%	3.3%
Born in Australia	77.1%	70.6%	71.4%	77.9%	67.1%	62%
English only, at home	82.2%	77.4%	75.5%	85.5%	68.7%	75.3%
Most common religious affiliation	Catholic 22.2%	Catholic 22.7%	Catholic 17.5%	Catholic 24.3%	Catholic 14.5%	Catholic 18.7%
In the labour force	54.7%	50.6%	43.3%	62.8%	43.2%	63.9%
Unemployed	6.1%	7.6%	14.5%	4.8%	15.8%	5.1%

	Beachlands	Beresford	Mount Tarcoola	Utakarra	WA
Aged 19 and under	18.8%	20.8%	27.1%	31.5%	23.9%
Aged 65 and over	20.9%	21.6%	17.2%	12.3%	16.1%
Aboriginal and/or Torres Strait Islander	9.5%	4.2%	5.8%	22.1%	3.3%
Born in Australia	76.7%	75.9%	78.7%	76.2%	62%
English only, at home	83%	82.4%	85.1%	79.2%	75.3%
Most common religious affiliation	Catholic 19.4%	Catholic 26.1%	Catholic 24.5%	Catholic 20.5%	Catholic 18.7%
In the labour force	57.2%	63.1%	66.4%	55.5%	63.9%
Unemployed	5.2%	5.1%	3.6%	11.3%	5.1%

⁷⁶ Form 2A

⁷⁷ ABS 2021 Census: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50536> (Geraldton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51280> (Rangeway), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50880> (Mahomets Flats), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50730> (Karoo), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50084> (Beachlands), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50112> (Beresford), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51036> (Mount Tarcoola) and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51486> (Utakarra)

- 7.8. Wonthella covers an area of approximately 3.7km².⁷⁸ The average person living in Wonthella, statistically speaking based on ABS Census data from 2021⁷⁹, can be described as follows:
- 7.8.1. female aged 43,
 - 7.8.2. self identifying as “non-indigenous”⁸⁰,
 - 7.8.3. not currently married or in a de facto relationship and living with no children,
 - 7.8.4. born in Australia, of English ancestry but with both parents having been born in Australia,
 - 7.8.5. of no religious affiliation,
 - 7.8.6. with only English used in the home,
 - 7.8.7. in the labour force, working full-time,
 - 7.8.8. with a personal weekly income of \$615 and
 - 7.8.9. not suffering a long-term health condition.
- 7.9. Most people living in Wonthella own their own home, either outright or with a mortgage⁸¹, with a current average market value of \$403,000⁸². They have enjoyed a five-year growth rate in the property market⁸³. Surrounding suburbs of Rangeway, Beachlands and Utakarra have been experiencing significant growth most recently at 30.4%, 29.7% and 27.1% respectively⁸⁴.
- 7.10. The following snapshot of all people living in the whole of the City of Greater Geraldton⁸⁵ provides further insight into characteristics of the wider area, together with some visitor data. Additional tourist numbers are referred to further on in this PIA.

⁷⁸ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁷⁹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635>

⁸⁰ Based on ABS definition/categorisation

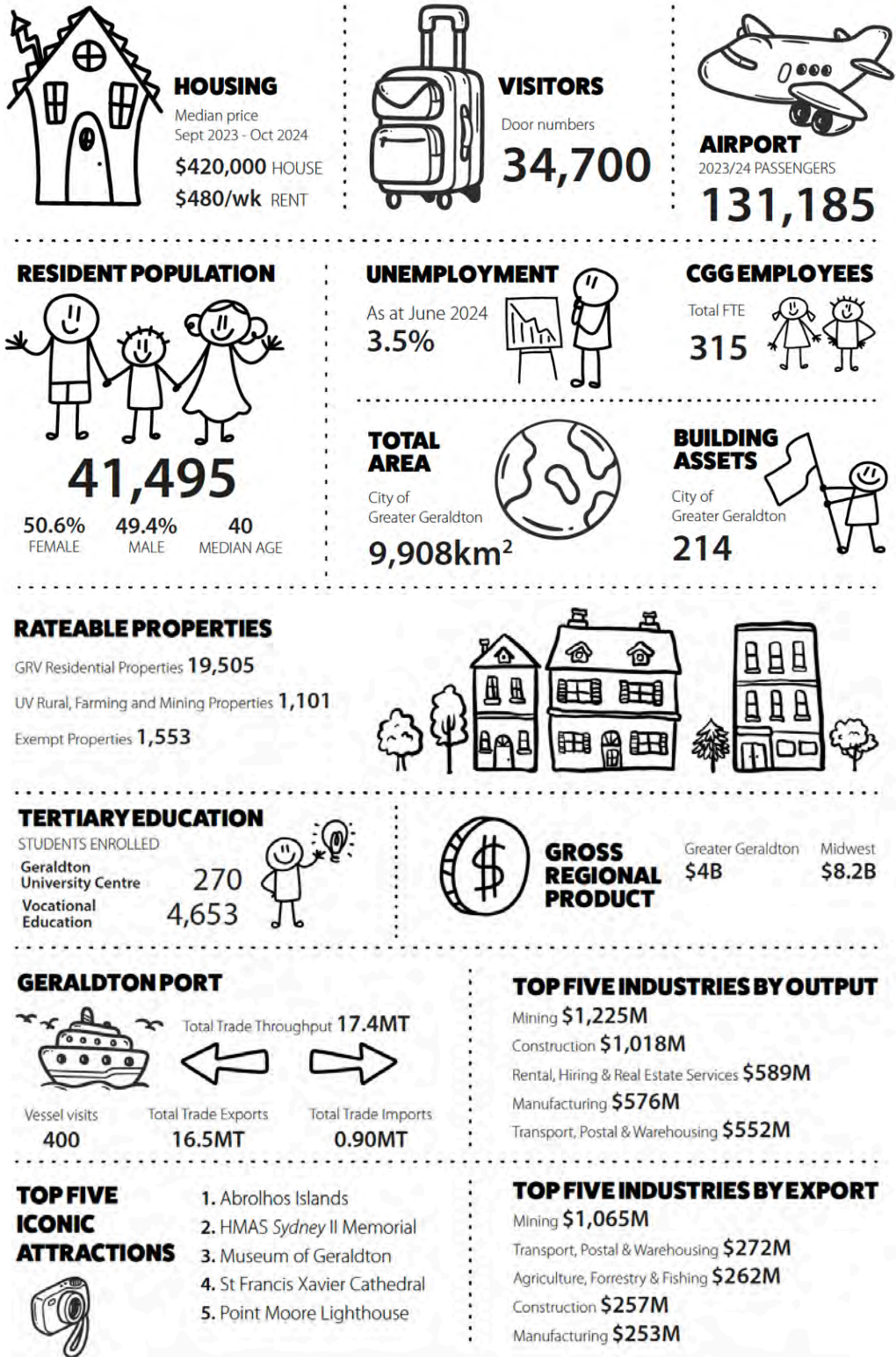
⁸¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella),

⁸² <https://reiwa.com.au/suburb/wonthella/>

⁸³ <https://reiwa.com.au/suburb/wonthella/>

⁸⁴ <https://reiwa.com.au/the-wa-market/regional-market-insights/>

⁸⁵ City of Greater Geraldton Annual Report 2023/2024, at page 5 (copy available if required, upon request)



7.11. “Geraldton is a thriving regional city, overlooking the Indian Ocean and supporting a rapidly growing population. Situated just over 400km north of Perth, Geraldton has all the major services, cultural, shopping and sporting facilities you would expect in a city, yet a more relaxed pace of life, typical of the country. As the regional service centre for the entire Mid West region, business

and employment opportunities are many and diverse. From fishing to tourism, mining to agriculture, small business to government roles and a comprehensive range of tertiary service industries, people from all walks of life are attracted to Geraldton's climate of opportunity... Greater Geraldton is a rapidly growing area, rich in indigenous and pioneering history. Geraldton is surrounded by Greenough which boasts fertile farm land and world class beaches. Situated an hour's drive inland from Geraldton, Mullewa sits in the heart of the wildflower region of Western Australia."⁸⁶

- 7.12. Socio-Economic Indexes for Areas by Local Government Area⁸⁷, which measure the relative level of socio-economic disadvantage and/or advantage, based on a range of ABS data have ranked the City of Greater Geraldton around the mid of the third quarter at number 96 out of 140, with a rating of 941, indicating that the average resident experiences slightly lower than average level of socio-economic conditions. This is can reasonably be presumed to be associated with the fact that a larger portion of the population appear to be retirees.
- 7.13. It is acknowledged that some people living in the 3km locality experience lower than average socio-economic circumstances and that this factor may, at first glance, be regarded as negative. Based on the following reasons it is respectfully submitted that such conditions are mitigated in this case and should not inhibit the grant of the licence:
- 7.13.1. The positive factors associated with the application are significant and of much greater weight.
 - 7.13.2. The circumstances surrounding the whole of and role of the City of Greater Geraldton ,as the capital and resource centre for the Mid West region, are very positive.
 - 7.13.3. The applicant's pricing, quality and value-for-money policies will enable people living in the 3km locality to be able to access and enjoy quality, award-winning liquor products which they might not otherwise be able to access.
 - 7.13.4. People experiencing low socio economic conditions should still be able to access liquor products and services that are very popular elsewhere, as ALDI's are.
 - 7.13.5. People experiencing low socio economic conditions should still be able to benefit from modern conveniences associated with liquor purchasing including one-stop shopping which is now a very established and expected aspect of modern consumer retailing but is currently not available in the area.

⁸⁶ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

⁸⁷ Index of Relative Socio-Economic Advantage and Disadvantage, 2021: <https://profile.id.com.au/wapl/seifa-disadvantage?SeifaKey=40002>; Western Australia Parliamentary Library community profile, idcommunity

- 7.13.6. The particulars of the ALDI Wonthella proposal should confirm that it will be a relatively discrete and low impact liquor outlet with little capacity to exacerbate low socio economic circumstances.
- 7.14. Further details of the nature and characteristics of the local community are provided elsewhere in this PIA.

Form 2A “3.3 (sic) List the community buildings in the locality”

- 7.15. As required by the Form 2A, the applicant provides names and addresses for the following identified to be operating in the 3km locality (some of which may be relevant under more than one heading/category but are only listed once):
- 7.15.1. Schools and educational institutions:
- 7.15.1.1. Desert to Coast Training and Assessing Geraldton, 39 Bradford Street, Wonthella
 - 7.15.1.2. Rangeway Primary School, 4 Cassia Street, Rangeway
 - 7.15.1.3. St John’s School, 12 Tamar Street, Rangeway
 - 7.15.1.4. Geraldton Senior High School, Carson Terrace, PMB 10100, Geraldton
 - 7.15.1.5. Holland Street School, 12 Holland Street, Geraldton
 - 7.15.1.6. Geraldton Primary School, 75 Fitzgerald Street, Geraldton
 - 7.15.1.7. St Francis Xavier Primary School, 5 Maitland Street, Geraldton
 - 7.15.1.8. Geraldton Flexible School, 27 Bayly Street, Geraldton
 - 7.15.1.9. Allendale Primary School, 52 Wittenoom Street, Geraldton
 - 7.15.1.10. Geraldton Grammar School, 134 George Road, Geraldton
 - 7.15.1.11. Child Care Course Geraldton – Micon Training, Sanford Street, Geraldton
- 7.15.2. Hospitals:
- 7.15.2.1. Geraldton Regional Hospital, 51-85 Shenton Street, Geraldton
 - 7.15.2.2. St John of God Geraldton Hospital, 12 Hermitage Stret, Geraldton
 - 7.15.2.3. Geraldton Health Campus, 30 Johnston Street, Geraldton
- 7.15.3. Hospices:
- 7.15.3.1. Geraldton Shore Care Community, 159 Fitzgerald Street, Geraldton

- 7.15.3.2. Attune Nursing and Disability Services, 75 Forrest Street, Geraldton
- 7.15.4. Aged care facilities:
 - 7.15.4.1. Bethanie Geraldton Social Centre, 38 Cairncross Street, Geraldton
 - 7.15.4.2. Juniper Hillcrest, 40 Onslow Street, Geraldton
 - 7.15.4.3. Midwest Aged Care Assessment Team/Geraldton Health Campus, Shenton Street, Geraldton
 - 7.15.4.4. Geraldton Nursing Home, 20 Milford Street, Geraldton
 - 7.15.4.5. Silverchain – Geraldton Service Centre, 114 Sanford Street, Geraldton
 - 7.15.4.6. Avocare Geraldton Office, 14 Foreshore Drive, Geraldton
 - 7.15.4.7. Avivo, 1/114 Sanford Street, Geraldton
- 7.15.5. Churches/places of worship:
 - 7.15.5.1. St Patrick's Catholic Church, cnr Third and Howard Streets, Wonthella
 - 7.15.5.2. Hope Lutheran Community Church, 250 Third Street, Wonthella
 - 7.15.5.3. Sun City Christian Centre, 14 Assen Street, Rangeway
 - 7.15.5.4. St John's Catholic Church, Lot 1931 Banksia Street, Rangeway
 - 7.15.5.5. Lighthouse Church Geraldton, 43 Shenton Street, Geraldton
 - 7.15.5.6. Living Word Church Geraldton, 8 Milford Street, Geraldton
 - 7.15.5.7. Church of Christ Geraldton, 105 Augustus Street, Geraldton
 - 7.15.5.8. Cathedral of the Holy Cross, 101 Cathedral Avenue, Geraldton
 - 7.15.5.9. St Francis Xavier Cathedral, 56 Cathedral Avenue, Geraldton
 - 7.15.5.10. Fresh Christian Fellowship, 225 Lester Avenue, Geraldton
 - 7.15.5.11. The Potters House Gospel Church Geraldton, 10 Baker Street, Geraldton
 - 7.15.5.12. Geraldton Baptist Church, 46 Quarry Street, Geraldton
 - 7.15.5.13. Geraldton Family Church, 1/3 Walton Close, Geraldton

- 7.15.5.14. The Salvation Army Geraldton Corps, 42 Ainsworth Street, Geraldton
- 7.15.5.15. Geraldton District Mosque, 172 George Road, Geraldton
- 7.15.5.16. Greek Orthodox Church of the Archangels Michael and Gabriel, 15 Mark Street, Beresford
- 7.15.6. Drug and alcohol treatment centres:
 - 7.15.6.1. Midwest Community Drug Service, 51-85 Shenton Street, Geraldton
 - 7.15.6.2. Regional Alliance West, Lotteries House, 1/114 Sanford Street, Geraldton
 - 7.15.6.3. Hope Community Services, 80a Forrest Street, Geraldton
 - 7.15.6.4. Step Up/Step Down Geraldton, 2 Larkin Street, Geraldton
- 7.15.7. Short term accommodation or refuges: Desert Blue Connect, 25 Chapman Road, Geraldton
- 7.15.8. Childcare centres:
 - 7.15.8.1. Magic Cottage Child Care Centre, 236 Fourth Street, Wonthella
 - 7.15.8.2. Goodstart Early Learning Wonthella, 250/254 Place Road, Wonthella
 - 7.15.8.3. Little Nemo's Geraldton, 1 Pass Street, Wonthella
 - 7.15.8.4. Ngala Child and Parent Centre, 13 Hovea Street, Geraldton
 - 7.15.8.5. Little Kingdom Childcare, 143 Brand Highway, Mount Tarcoola
 - 7.15.8.6. Turtle Cove Early Learning Central, 44 Gertrude Street, Geraldton
 - 7.15.8.7. Bambi Childcare Centre, 175 Fitzgerald Street East, Geraldton
 - 7.15.8.8. Bambi Childcare Centre, 166 Augustus Street, Geraldton
 - 7.15.8.9. OSCCA, Ramshaw Place, Geraldton
 - 7.15.8.10. Home Interaction Program for Parents & Youngsters (HIPYPY) Geraldton, 184 Marine Terrace, Geraldton
 - 7.15.8.11. Centacare Family Services, 3 Maitland Street, Geraldton
 - 7.15.8.12. Gumnuts Clubhouse and Family Daycare, 57 Dorothy Street, Geraldton
 - 7.15.8.13. Kidz Retreat, 171 George Road, Beresford

- 7.15.9. Local government: City of Greater Geraldton
- 7.16. Other facilities in the 3km locality which could potentially be regarded as "community buildings" for this section of the PIA, include the following:
- 7.16.1. Geraldton PCYC, 105 Pass Street, Wonthella
- 7.16.2. Queen Elizabeth II Community Centre, 88 Durlacher Street, Geraldton
- 7.16.3. The Mens Shed Geraldton Inc, 67 Gregory Street, Geraldton
- 7.16.4. Geraldton Regional Community Education Centre, 24 Gregory Street, Geraldton
- 7.16.5. Connected Beginnings Geraldton Parent Hub, 29 Whitfield Street, Beachlands
- 7.16.6. Geraldton Multipurpose Centre, 250 Marine Terrace, Geraldton
- 7.16.7. Centacare Men's Hub, 156 Durlacher Street, Geraldton
- 7.16.8. Play More, 9/65 Chapman Road, Geraldton
- 7.17. The ALDI Wonthella liquor section will not be visible, nor directly accessible, from any of the places listed above or anyone walking or driving to or from any of those places, nor to any residence. The proposed licensed area will be concealed to anyone outside of the ALDI store.

8. Form 2A "Part 4 – Minimising the potential for alcohol to cause harm"

Form 2A "4.1 What strategies will you use to minimise harm from the use of alcohol?"

- 8.1. Risk management and harm minimisation from the sale and supply of liquor are not only very familiar subjects to ALDI but are prominent considerations and given priority in operational policies. ALDI has been successfully implementing measures that minimise harm and ill-health at its large number of existing liquor outlets for many years. Its liquor store model has been much tried and tested and proven to be entirely positive.
- 8.2. The applicant has had regard for harm and ill-health factors potentially associated with the new liquor licence, with reference to its trading history. The applicant has an excellent trading record in terms of compliance and is not aware of any of its licences causing harm or ill-health.
- 8.3. Any potential negative impact of the licence should be considered in light of the low risk features of the ALDI liquor model, which are described throughout this PIA. This proposition is supported by the following finding of the Liquor Commission in ALDI Harrisdale⁸⁸ which involved virtually the same proposal:

⁸⁸ ALDI Harrisdale [38(b)]

"There is nothing to suggest that the granting of the licence will result in an increase in harm and ill-health. The small size of the proposed premises, the nature of its operation and the limited number of products are significant factors in reaching this conclusion."

- 8.4. To reiterate, no part of the proposed licensed area will be visible in any way to/from churches, schools, hospitals and childcare centres etc within the 3km locality.
- 8.5. The applicant has sought to identify current information regarding alcohol related hospitalisations and deaths specifically associated with the 3km locality, but none could be identified from published material. Further, "due to different classification systems and alcohol as a contributing factor not being recorded within all health datasets, challenges exist in quantifying the incidence of alcohol-related injuries in WA"⁸⁹. In addition, there is no authoritative definition of, or clear criteria for, what might be regarded as "alcohol related".
- 8.6. Nonetheless, the applicant acknowledges that hospitalisation and death:
- 8.6.1. can potentially result for some people as a consequence of the use of liquor and
- 8.6.2. has occurred and would most likely be currently occurring at some level in the 3km locality, in relation to the use of liquor.
- 8.7. The WA Primary Health Alliance Midwest Needs Assessment 2022-2024⁹⁰ has been considered. It relates to the whole of the Midwest region. The following has been identified from that Assessment:
- 8.7.1. The Midwest region has recorded statistically higher long term health risks among residents, in terms of liquor consumption (at page 7).
- 8.7.2. Emergency department presentations in the Midwest for alcohol and other drugs were recorded and may be higher than some other parts of the State, although the statistics were not fully quantified (page 8).
- 8.7.3. "The dominant health concerns in the Midwest are mental health, chronic disease and alcohol consumption" (page 12)
- 8.8. 2021 ABS data reveals that the top long term health condition for residents of Wonthella is asthma⁹¹. The top three long-term health conditions of residents in the 3km locality are mental health issues followed by arthritis and asthma⁹². The

⁸⁹ Alcohol-related injuries in Western Australia Position Paper, by Injury Matters, dated April 2022, at page 2 (www.injurymatters.org.au) – copy of the paper available if required, upon request

⁹⁰ Copy available if required, upon request

⁹¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635>

⁹² Combined average of 2021 ABS Census data for the suburbs that are most representative of the 3km locality: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635> (Wonthella), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50536> (Geraldton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51280> (Rangeway), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50880> (Mahomets Flats), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50730> (Karlooloo),

latter two are of virtually equal prevalence. Neither arthritis nor asthma are known to be commonly associated with liquor.

- 8.9. “[D]ata from Roy Morgan’s Alcohol Consumption Report shows the proportion of Australians who drink alcohol dropped by 1.8 percentage points to 67.9 per cent in the 12 months to June 2022”⁹³. Data for the 12 months to March 2023 showed an increase of 1.3%, but relevantly “[t]he most significant driver of the increase [was] the increasing popularity of RTDs (Ready-to-drink)”⁹⁴ and ALDI’s liquor range includes only a tiny number of RTDs. The attached stocklist contains only six different RTDs. They will certainly not be available in bulk or even in large supply compared to other liquor outlets, given ALDI’s modest stock volume and manner of trade and they will only be available warm and during limited trading hours.
- 8.10. “Alcohol consumption has been declining among students in WA over the past few decades (WA Mental Health Commission, 2017). In 1999 around 36% of students surveyed reported having used alcohol in the past week, in comparison to 15% in 2017. Over this period the number of students reporting never having consumed alcohol increased from 10% to 38% (WA Mental Health Commission 2017)”⁹⁵.
- 8.11. ALDI has factored advertising and promotion into its harm minimisation strategies. Flamboyant and highly suggestive advertising posters, encouraging or even suggesting rapid, excessive or juvenile drinking are not displayed in association with ALDI’s liquor service. Nor does ALDI advertise discount liquor prices for certain periods. This is because traditional, ad hoc “sales” may encourage customers to purchase more liquor than they otherwise would have for fear of missing out on the deal.
- 8.12. Placing a heavy focus on staff is another key strategy for implementing policies and practices are complying with relevant laws.
- 8.13. ALDI operates pursuant to a highly evolved and sophisticated corporate structure and hierarchy whereby staff at each level are entrusted with an advanced degree of responsibility and are provided with extensive and comprehensive training and support.
- 8.14. ALDI is a market leader in terms of staff training and development. Its impressive approach in this regard is detailed in the following sub-paragraphs:
- 8.14.1. “We believe that good people working together, united by a shared purpose, can achieve extraordinary things. ALDI isn’t just a workplace; it’s a place where you’ll be part of a tight-knit team that

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50084> (Beachlands),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50112> (Beresford),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51036> (Mount Tarcoola) and

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51486> (Utakarra)

⁹³ <https://theshout.com.au/australian-alcohol-consumption-declines-rtcd-consumption-at-record-high/>

⁹⁴ <https://www.roymorgan.com/findings/9153-alcohol-consumption-march-2023>

⁹⁵ Perth North PHN Needs Assessment 2022-2024 prepared by WA Primary Health Alliance at page 25 (copy available if required and upon request by the licensing authority)

supports and uplifts each other, where you can learn, grow and develop and make a meaningful impact by helping everyday Australians live richer lives for less.”⁹⁶

8.14.2. “We provide [staff] with comprehensive training including induction training and quarterly retraining. We also offer leadership training programs that help create the operational leaders of the future.”⁹⁷

8.14.3. “We offer diverse and cross-functional career pathways. We also value internal promotions with over 70% of our leaders promoted internally.”⁹⁸

8.14.4. “ALDI Australia has taken top spot in the Australian Business Award’s – Employer of Choice 2020”⁹⁹.

8.14.5. ALDI has been awarded Retail Employer of the Year at the eftpos Australian Retail Association Awards.

The ARA said that ALDI have proven to be “fierce contenders” with a strong commitment to diversity, non-discrimination and support to all employees. The supermarket was recognised for incorporating internal and external recruiting methods to select candidates and for nurturing the skills, confidence and leadership required to operate business functions.

“Through a commitment to staff and the community, ALDI are the pioneers in the retail sector, leaving no stone unturned,” the ARA said.

100

8.14.6. Every ALDI staff member is required to undertake detailed internal training and an induction programme, which will certainly apply for staff at the ALDI Wonthella store. This involves education on a wide variety of facets of the business and includes liquor product knowledge and responsible service. To help ensure high standards are achieved at all times, all ALDI staff are employed on a permanent basis.

8.14.7. The applicant will ensure all staff at the ALDI Wonthella store are properly trained as to their responsibilities under the Act, the licensing authority’s policies, ALDI policies and procedures, matters of safety and all other laws and regulations applicable to the proper conduct of the business.

8.14.8. The liquor section will be adequately staffed at all times with appropriately trained and knowledgeable people. In addition to having sufficient numbers of approved managers, other part-time and full-time staff will also be employed. At least one qualified unrestricted approved manager will be at the store at all times.

⁹⁶ <https://www.aldicareers.com.au/>

⁹⁷ <https://aldiaustralia-1481176-en-au.sr-atrax.com/benefits-that-matter>

⁹⁸ <https://aldiaustralia-1481176-en-au.sr-atrax.com/benefits-that-matter>

⁹⁹ <https://www.aldiunpacked.com.au/aldi-australia-is-recognised-as-an-employer-of-choice/>

¹⁰⁰ <https://insidemca.com.au/2018/10/19/aldi-awarded-ara-employer-of-the-year/>

- 8.14.9. In-store staff are required to wear a uniform, which is of a smart and modern style and bears the ALDI logo. Staff presentation is considered by the applicant to be important both in terms of upholding its image and also in portraying a professional and responsible approach to the business.
- 8.14.10. PRG found that only a mere 2% of members of the local community recently surveyed consider that harm or ill-health could be experienced by them if the licence is granted.¹⁰¹
- 8.15. Another harm minimising element of the ALDI model is the strong focus on quality of product and value-for-money propositions, not just price per se. The applicant invests enormously in providing customers with the perfect balance of high quality product at the lowest price that can be achieved whilst maintaining the quality. Many of its liquor items have been awarded accordingly. This value-for-money philosophy – which is entirely different from simple notions of low price and being cheap – is entirely consistent with consumer requirement. This latter proposition is supported by the following:
- 8.15.1. “Aldi is arguably one of the biggest disruptors to hit the Australian economy over the past 20 years, single handedly busting open the Woolworths/Coles supermarket duopoly.”¹⁰²
- 8.15.2. “Seventy-eight percent of consumers are prioritising value for money when shopping...”¹⁰³
- 8.15.3. “Almost 8 in 10 (77%) of the total ALDI shopper sample liked this [value for money pricing] aspect of the proposed Wonthella ALDI liquor section... Note the elevated for 86% and 97% respectively of packaged liquor buyers, and those who have consumed ALDI liquor products purchased from a WA ALDI store, provided a “like” response... the weight of sentiment is very much in support of this aspect of the proposed ALDI liquor section.”¹⁰⁴
- 8.16. The ALDI liquor model clearly presents with a number of low risk elements, all of which have been proven to be successful in many of its stores in other locations given ALDI's excellent trading record.
- 8.17. As referred to previously, the liquor section will be positioned away from the entrance to the supermarket, tucked-away in the corner of the store, surrounded by opaque barricading making it substantially separate and discrete. Shoppers could choose to avoid the liquor section if they so wished. The layout of the supermarket and checkouts enables any shopper to work their

¹⁰¹ PRG report at para 2.2.1, page 8

¹⁰² <https://www.macrobusiness.com.au/2021/03/the-rise-and-rise-of-aldi/>

¹⁰³ <https://ecommerceneews.com.au/story/australians-prioritise-value-for-money-as-economic-pressures-mount#:~:text=Seventy%2Deight%20percent%20of%20consumers,research%20from%20Shopify%20has%20revealed and https://retailworldmagazine.com.au/four-in-five-australians-now-prioritise-value-for-money/>

¹⁰⁴ PRG report at para 4.5.4, page 23

way through the supermarket with barely noticing the liquor component, if at all and not needing to cross through it or near it.

- 8.18. To summarise and reiterate, the following are the key harm and risk minimising features of the ALDI Wonthella liquor proposal:
- 8.18.1. Its small size
 - 8.18.2. The bright, open-plan layout
 - 8.18.3. The absence of refrigeration to help avoid impulse buying and impulse drinking. The absence of a walk-in coolroom also enhances surveillance.
 - 8.18.4. The limited stock range and volume.
 - 8.18.5. The absence of an online delivery service
 - 8.18.6. The absence of bulk quantities of cheap mainstream products.
 - 8.18.7. Reduced trading hours – significantly less than permitted under the Act and less than the usual trading hours of most other liquor stores.
 - 8.18.8. Its location/position confined within the supermarket footprint, away from the main store entrance, under the close supervision of the supermarket and its staff. ALDI staff will have a clear line of sight into the liquor display/browse area at all times.
 - 8.18.9. The restricted visibility into the liquor section.
 - 8.18.10. The lack of immediate or direct egress from the liquor area outside into the public domain. The design and layout forces customers to enter the supermarket and walk past the watchful eye of several trained staff.
 - 8.18.11. The limited and controlled nature of product pricing.
 - 8.18.12. The lack of signage external to the store advertising discounted liquor products.
 - 8.18.13. The highly experienced and reputable operator.
 - 8.18.14. The high level of staff training.
- 8.19. Importantly also, there will be none of the following:
- 8.19.1. Prominent external advertising of liquor products and their prices.
 - 8.19.2. Products, advertising or promotional materials designed to entice juveniles.
 - 8.19.3. Large volumes of cheap bulk products displayed.
 - 8.19.4. Volumes of liquor products refrigerated and ready-to-drink.
 - 8.19.5. Energy drinks stocked in the liquor display/browsing area.
 - 8.19.6. Late trading hours.

- 8.20. In respect of the issue of juveniles, very strict policies will apply. ALDI is very aware of the fact that juveniles will be in the supermarket from time to time, some of whom may be unaccompanied by a parent/guardian.
- 8.20.1. The store layout will enable juveniles to totally avoid going near the liquor section.
- 8.20.2. The combination of store layout and security systems will facilitate and ensure a constant and high degree of surveillance over the liquor area and checkout to safeguard the proper management of juveniles. ALDI has successfully managed this issue at its existing stores elsewhere in Western Australia for many years.
- 8.20.3. No liquor will be sold or supplied to juveniles or anyone who is suspected of trying to obtain liquor for a juvenile.
- 8.20.4. ALDI has adopted an "ID Under 25" policy. Staff at ALDI Wonthella will be directed to go beyond the requirement to ask customers suspected of being under the age of 18 to prove their age and in fact ask all customers suspected of being under the age of 25 for age verification, so as to err on the side of caution.
- 8.20.5. The applicant will operate under a strict policy, which will be taught to and perpetuated with its staff, whereby liquor is not sold or supplied to anyone whom it is suspected might give the liquor to a juvenile, including guardians and parents.
- 8.20.6. Juveniles observed to be loitering near the liquor block will be asked to move on and no juveniles will be permitted in the licensed area unless accompanied by a responsible adult. The applicant has not experienced notable issues of this kind at its existing stores.
- 8.20.7. Lollies and other items commonly known to attract the attention of juveniles will not be stocked in the liquor display/browse area.
- 8.20.8. The liquor display and browse area will have limited line-of-sight such that visibility into that area will be restricted.
- 8.20.9. The liquor area will be subject to a high level of surveillance and security from the relevant checkout.
- 8.20.10. Unaccompanied juveniles who may be in the supermarket from time to time will be directed to a non-licensed checkout to make their purchase.
- 8.21. A clear example to confirm ALDI's high standards in its liquor service is when the company came under scrutiny from the public for the strictness of its approach to liquor and juveniles. Some ALDI stores in New South Wales have refused service to adults because staff have witnessed a juvenile touching the liquor

items, even where they have touched the items simply to stop them from falling over in a trolley.¹⁰⁵

- 8.22. Adult consumers have felt comfortable shopping in an ALDI liquor area with their children as clearly depicted, by way of example, in the images below taken at one of the busy operating ALDI stores in WA with a liquor section¹⁰⁶.



- 8.23. Every effort will be made by the applicant to conduct business under the new licence in a manner that minimises the potential for harm or ill-health to occur as a result of the liquor store licence operating in Wonthella.
- 8.24. The applicant is an upstanding corporate citizen which operates pursuant to several high level standards and policies. ALDI has a considerable presence in the public domain, which it intends to continue growing in Western Australia. It is in the applicant's interests to ensure that the liquor service in Wonthella is successful in all respects, including genuinely minimising harm and successfully managing risks.

¹⁰⁵ <https://www.news.com.au/finance/business/retail/aldis-strict-underage-alcohol-policing-leaves-shoppers-high-and-dry/news-story/c7beaa2c4b8e1f0345b3545c98c7789c>

¹⁰⁶ Faces redacted for privacy reasons

- 8.25. The applicant has identified the issue of crime in terms of harm factors applicable to the 3km locality. Evidence of proven relevant crimes could not be found. The information contained in the attached offence data summary has been considered¹⁰⁷ which includes published police records. This police data may possibly assist in assessing very broadly and generally criminal offence activity in the area.
- 8.26. It is acknowledged that there is high level of crime occurring in the 3km locality and that Wonthella itself has a high rate. A degree of crime is to be expected given the large resident population, the intense role of the area as the capital and resource centre for the whole MidWest region, the concentration of businesses within the area and the hundreds of thousands of visitors that the area experiences each year¹⁰⁸.
- 8.27. Whilst any crime rate is an issue to be addressed, the Police data for the 3km locality may be regarded as relatively proportionate and somewhat typical given the circumstances of the area.
- 8.28. Across most of the 3km locality and in Wonthella itself, the highest type or category of Police offence recorded is “theft”¹⁰⁹. ALDI has multiple measures in place to reduce the risk of theft and is extremely experienced in the subject.
- 8.29. The applicant will maintain its tried and tested risk management, safety and security measures and implement additional steps, to minimise potential crime. These measures are addressed elsewhere in this PIA and will continue to ensure the risk of any crime associated with the premises is minimised, as it currently is. In addition, the likelihood of the liquor service contributing to alcohol related crime is reduced by the following mitigating factors.
- 8.29.1. Small, simple and open layout of the liquor block.
 - 8.29.2. Location within the confined safety of the supermarket premises.
 - 8.29.3. Lack of external frontage.
 - 8.29.4. Location of the liquor area adjacent to the checkout and therefore, under constant close staff surveillance and supervision.
 - 8.29.5. Absence of refrigeration, which removes the opportunity for impulsive desires to steal liquor for immediate consumption.

¹⁰⁷ Red Suburbs Crime Map of Australia as at mid September 2025 for the most relevant suburbs: <https://redsuburbs.com.au/suburbs/wonthella/>, <https://redsuburbs.com.au/suburbs/geraldton/>, <https://redsuburbs.com.au/suburbs/rangeway/>, <https://redsuburbs.com.au/suburbs/mahomets-flats/>, <https://redsuburbs.com.au/suburbs/karlool/>, <https://redsuburbs.com.au/suburbs/beachlands/>, <https://redsuburbs.com.au/suburbs/beresford/>, <https://redsuburbs.com.au/suburbs/mount-tarcoola/> and <https://redsuburbs.com.au/suburbs/utakarra/>. This is not evidence of proven crimes.

¹⁰⁸ As referred to in section 7 of this PIA

¹⁰⁹ <https://redsuburbs.com.au/suburbs/wonthella/>, <https://redsuburbs.com.au/suburbs/geraldton/>, <https://redsuburbs.com.au/suburbs/rangeway/>, <https://redsuburbs.com.au/suburbs/mahomets-flats/>, <https://redsuburbs.com.au/suburbs/karlool/>, <https://redsuburbs.com.au/suburbs/beachlands/>, <https://redsuburbs.com.au/suburbs/beresford/>, <https://redsuburbs.com.au/suburbs/mount-tarcoola/> and <https://redsuburbs.com.au/suburbs/utakarra/>

- 8.29.6. Lack of a walk-in cool room, which is usually hidden from staff view in most other liquor stores, providing cover and convenience for would-be criminals.
- 8.29.7. Installation of CCTV surveillance throughout the supermarket, including the proposed licensed area.
- 8.29.8. Reduced trading hours – no intention to operate late at night.
- 8.30. ALDI's considerable retailing experience, including selling liquor products, has provided the organisation with the ability to manage security well such that crime associated with ALDI stores is kept very low. The quality of the premises at the Wonthella store, both inside and outside and the standard of supervision by staff will help make the public feel welcome and safe but any would-be criminals or disorderly persons uncomfortable.
- 8.31. The liquor area will have no external access as it will be entirely confined and secured within the ALDI supermarket, set-back considerably from the main entrance.
- 8.32. The following security steps will be taken in relation to the Wonthella liquor section.
 - 8.32.1. Security cameras both inside the licensed area and outside will be operating.
 - 8.32.2. Secure locking systems will be engaged for after hours.
 - 8.32.3. A high level of staff training which includes how to deal with incidents that are, or could potentially become, obviously criminal or unsafe.
 - 8.32.4. Maintaining a rigid enforcement of harm minimisation principles and policies. These will include, for example the "ID Under 25" policy, staff training, participation in the local liquor accord (if there is one), notifying Police of potential criminal behaviour and keeping in contact with Police.
 - 8.32.5. Clear and obvious signage. The new premises will be bright, modern and attractive.
 - 8.32.6. Limited public access and egress via one point only, from within the supermarket under the constant watching-eye of the cashiers. This will ensure a high level of staff surveillance from inside the store and inhibit would-be criminals by restricting the ease of a get-away.
- 8.33. The applicant has established a Security Layout plan, illustrating the general position and fit-out of the items described above. A copy can be provided to the licensing authority on a confidential basis, if required, upon request. An advanced security and surveillance system will be installed, based on the model which has been successfully operating in the eastern states. The applicant's advanced system includes the following features:

- 8.33.1. An Access Control System as follows:
 - 8.33.1.1. 24 hour entry system to the store including interface with the security system.
 - 8.33.1.2. A tamper switch will be applied to set off the alarm in the event of unauthorised removal of the panel front covers.
- 8.33.2. CCTV system – 24-hour surveillance of the licensed area and entry and exits to the store, which will include the following:
 - 8.33.2.1. 11 active cameras will provide 24-hour surveillance with the digital video recorder.
 - 8.33.2.2. Two full body cameras located within the licensed area, one facing the checkout and another one facing the liquor shelf.
 - 8.33.2.3. The digital video recorder will be configured for motion detection to allow efficient review of any incidents.
 - 8.33.2.4. An appropriately sized hard disk will be installed to allow images to be retained on the digital video recorder for at least two weeks without greatly compromising recording quality.
 - 8.33.2.5. The CCTV flat panel monitor will be located in the office to provide real time monitoring to the store staff of the retail floor including the licensed area. This will include a play-back function.
- 8.33.3. The security system equipment will include the following:
 - 8.33.3.1. Passive Infra-Red Motion Detectors.
 - 8.33.3.2. Break glass detectors.
 - 8.33.3.3. Magnetic reed switches.
 - 8.33.3.4. Vibration detector.
 - 8.33.3.5. External strobe and siren.
 - 8.33.3.6. Security flashing lights and horns.
- 8.33.4. A back-to-base monitoring system which will raise a security alarm if the security system is armed and there is a breach. The back to base alarm will then send a patrol as well as notifying the manager, which will also activate an external strobe light and external siren.
- 8.34. The design and installation of the electronic security, access control and audible system shall comply with the requirements of all relevant standards and codes including but not limited to the following:
 - 8.34.1. Australian Standards AS/NZS 3000.

- 8.34.2. State Service and Installation Rules.
 - 8.34.3. National Construction Code.
 - 8.34.4. Local and other authority services and installation rules.
 - 8.34.5. Australian Communications Authority.
 - 8.34.6. Work Cover Authority.
 - 8.34.7. Other relevant Australian standards.
- 8.35. Of real significance is the fact that the ALDI liquor area design and layout facilitate an advanced level of security and surveillance. The store's design will make it extremely difficult for juveniles, drunk people or would-be thieves to gain access to the liquor area and go undetected. This will be achieved by virtue of the following factors:
- 8.35.1. Customers will be required to walk well into the supermarket footprint under clear view of a combination of various cameras, staff monitoring them and other customers observing.
 - 8.35.2. Customers will be required to walk through the manned and monitored checkouts in order to exit the store. There will be no quick get-away option.
 - 8.35.3. The simple small layout of the liquor area will also ensure that it is not in any way attractive for juveniles, drunk people or would-be criminals nor a temptation for impulse procurement.
 - 8.35.4. The location tucked away in the far corner of the store.
- 8.36. Further in relation to crime prevention, in the preparation of this PIA the City of Greater Geraldton's Community Safety & Crime Prevention Plan 2024-2029¹¹⁰ has been considered. The most relevant aspects of that Plan to the ALDI Wonthella proposal are in relation to principles of design which have already been factored in and supporting the Geraldton Liquor Accord which the applicant does.

9. Form 2A “Part 5 – Impact on the amenity, quiet or good order of the locality”

Form 2A “5.1 How will your premises design protect the amenity, quiet or good order of the locality?”

- 9.1. The proposed liquor section will not have any external frontage, façade or overt signage. It will be contained inside the wider ALDI Wonthella store footprint. The intended manner of trade is for the liquor service to complement the grocery and household offering from a small, discrete and segregated section within the supermarket. The premises will not operate as a stand-alone liquor outlet.

¹¹⁰ Copy available if required, upon request

- 9.2. Given these circumstances, there will be no impact on the streetscape or external physical amenity whatsoever and so the amenity, quiet and good order of the 3km locality shall be entirely preserved and protected.
- 9.3. The amenity of the 3km locality has been variously described in earlier sections of this PIA. There is a mix of land uses including residential, retail, hospitality and other commercial, civic, ocean, transport and parkland. The ALDI store is an established fixture in the area. It has been operating at the site for nearly 9 years.
- 9.4. Among the evidence of a bustling and growing area surrounding ALDI Wonthella is that of building approvals in recent years, which have significantly increased¹¹¹ and the tens of thousands of vehicles travelling past the ALDI Wonthella store on average every day¹¹² along the North West Coastal Highway "Primary Distributor"¹¹³.
- 9.5. Within this existing amenity, the ALDI liquor section will be an ideal addition from an operational perspective and in terms of enhancing services to the public. From a visual, physical or streetscape perspective, the proposed licensed area will have no impact whatsoever. It will not be seen from anywhere other than well inside the ALDI supermarket.
- 9.6. Despite the relatively tiny licensed area, of only approximately 48m² in total (inc office) the ALDI Wonthella liquor proposal will make a big and valuable contribution towards the services and facilities in the area. The expert consumer survey found that 81% of local people consider that the ALDI liquor section will not lessen the amenity of the 3km locality.¹¹⁴
- 9.7. The applicant's store is clearly visible and easily accessible from North West Coastal Highway on its western side, from both directions and supported by ample on-site parking, as depicted in the following Google Maps image:



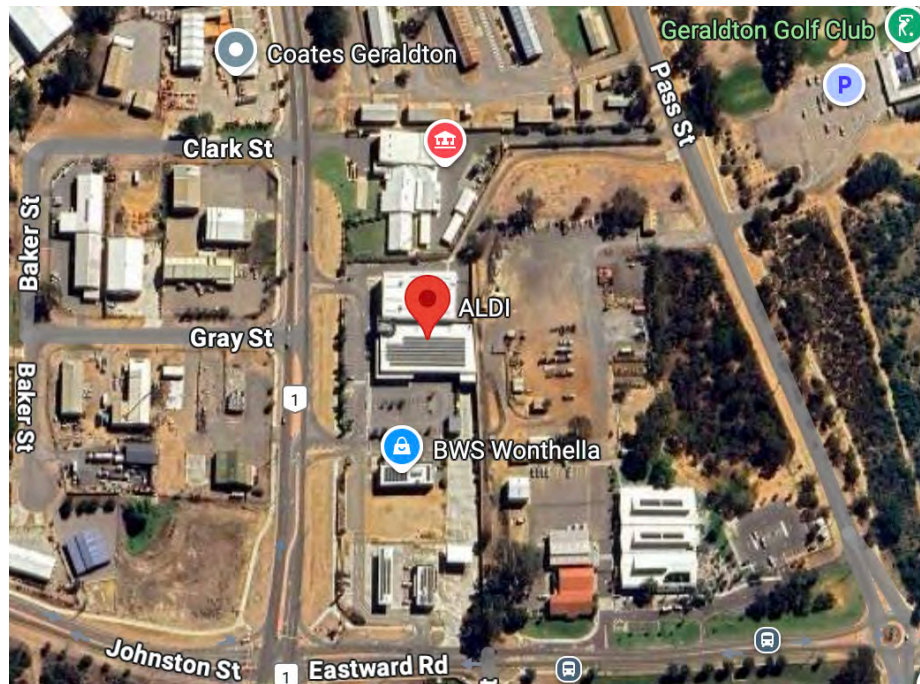
¹¹¹ <https://www.cgg.wa.gov.au/business/growing-greater-geraldton/socio-economic-profiles.aspx>

¹¹² at the nearest published traffic recording points on North West Coastal Highway at west of Geraldton Mount Magnet Road and north of Second Street at pages 49 and 50: Statewide Main Roads Western Australia Traffic Digest 2020/21-2025/26 (copy available if required, upon request)

¹¹³ <https://portal-mainroads.opendata.arcgis.com/datasets/mainroads::road-hierarchy/explore?location=-28.776875%2C114.626784%2C17.91>

¹¹⁴ PRG report at paras 2.2.1 and 4.7 on pages 8 and 30 respectively

- 9.8. Neighbours are all commercial buildings and businesses including large format retail, as depicted by the following wider Google Maps image.



- 9.9. There are residents' homes nearby, buffered by roads and the infrastructure described above. The nearest home is believed to be approximately 220m (as the crow flies). As stated elsewhere in this PIA, the liquor section will be confined well within the wider ALDI store proper, with no street frontage or other external façade. It will be concealed. There is no park or other gathering-type place for sensitive people or at-risk groups known to be close by. The nearest resident will be much further away in reality than the 220m straight line distance.
- 9.10. Further submissions addressing the amenity issue under the Act and as referred to in the Form 2A are provided in the applicant's Legal Submissions.

10. Form 2A “Part 6 – Impact on the people who live or work nearby and whether they might suffer offence, annoyance, disturbance or inconvenience”

Form 2A “6.1 What actions will you take to minimise the impact on people who live or work nearby?”

- 10.1. ALDI has an excellent trading history. It is not known to be the cause of any offence, annoyance, disturbance or inconvenience in relation to any of its existing liquor store licences.
- 10.2. ALDI has carefully considered the impact that may be caused to people who reside or work in the vicinity of the proposed licensed premises in terms of how and in what circumstance, the sale and supply of liquor could potentially cause those people offence, annoyance, disturbance or inconvenience.

- 10.3. It is not considered that there are any high risk factors associated with the ALDI application, for the various reasons referred to throughout this PIA. Despite that conclusion, the applicant acknowledges the potential for adverse effects from any sale and supply of liquor and hence proposes to implement the following strategies to manage and minimise risks.
- 10.3.1. Maintaining a manner of trade which is low risk and low impact.
 - 10.3.2. Managing delivery times and methods in such a way as to minimise potential disturbance to others, even although there is no neighbour in close proximity.
 - 10.3.3. Implementing tried, tested and proven operational policies for overall management and conduct of business.
 - 10.3.4. Closely monitoring unaccompanied juveniles.
 - 10.3.5. Not stocking controversial liquor products and promotions designed to be attractive to juveniles.
 - 10.3.6. Maintaining a high standard of premises in terms of cleanliness, tidiness and overall quality, to indicate to patrons the operator's professional approach to management of the business.
 - 10.3.7. Employing only mature and skilled people to run the operation, all of whom will be presented in professional uniform. The staff will all be trained to be able to exhibit a high level of stock knowledge. These features will add an element of responsibility to the functioning and image of the business.
- 10.4. ALDI's advanced practises in terms of staff training will ensure that staff at ALDI Wonthella will consistently enforce and uphold the licensee's policies and philosophies for a compliant business which focuses on integrating with the local community. The applicant values its excellent reputation as an upstanding corporate citizen and employees will continue to be trained to uphold reputation and share in ALDI's core values.
- 10.5. No high risk factors associated with the liquor store proposal in this case have arisen in preparing this PIA, especially given ALDI's trading history. The small risk factor that does exist, as with any licensed premises, will be closely monitored and carefully managed in any event.

11. Form 2A “Part 7 – Impact on tourism, culture and the community”

Form 2A “7.1 Are there any tourism, cultural and community benefits that would result from the grant of your application?”

- 11.1. People living in, near and visiting the 3km locality stand to benefit enormously from the introduction of the ALDI liquor service. The public will have the demand

met and enjoy the well-known ALDI liquor products and services in their area which have been relished by other Australians elsewhere for many years.

- 11.2. The opening of ALDI stores in Western Australia has been met with great enthusiasm by customers from across the metropolitan area. When the first ALDI stores in WA started trading in June 2016, members of the public queued up for hours, in winter, before the stores opened, as seen in the photographs below¹¹⁵.



- 11.3. Clearly ALDI's positive reputation preceded itself and since then, as addressed earlier in this PIA, ALDI has grown and cemented itself in the WA market as a sought-after retailer. In the first six months of trade in Western Australia, more than 3.2 million customers were served at ALDI stores. The ALDI Cloverdale store transacted a staggering 156,338 customers in just 69 days of trading, which is an average of 2,266 customers per day.¹¹⁶
- 11.4. The licensing authority is entitled to take into account the popularity of similar services provided at other locations when assessing whether the proposed services will be in the public interest at this particular location.¹¹⁷
- 11.5. The growth and success of ALDI has resulted in tremendous employment benefits for Western Australians. The applicant currently employs approximately 1,000 people in WA. The approval of this application will generate further employment opportunities for people at ALDI which will be a most positive

¹¹⁵ <https://www.watoday.com.au/national/western-australia/keen-shoppers-brave-cold-for-opening-of-perth-aldi-stores-20160608-gpe297.html>

¹¹⁶ Evidence available if required, upon request




¹¹⁷ *Woolworths Ltd v Director of Liquor Licensing* [2013] WASCA 227 [77] (Buss JA)

impact for the local community and will answer the Geraldton Jobs and Growth Plan 2020-2023: Growing the capital of the Midwest¹¹⁸.

- 11.6. The consumer evidence in this case is clear, directly on-point and compelling. Hundreds of members of the local community have expressed a strong demand for the ALDI liquor products and service.
- 11.7. The expert market research has concluded that “[i]t is clear that the great majority of packaged liquor buyers who currently shop at Wonthella ALDI would shop for their packaged liquor requirements from the ALDI liquor section if it was established. Almost half (49%) would do so at least once a fortnight, 70% at least once a month and 92% on at least some occasions, should the liquor section be established within the Wonthella ALDI store... The clear suggestion is that the Wonthella ALDI liquor section would better meet their packaged liquor requirements than the currently available Wonthella liquor outlets.”¹¹⁹
- 11.8. Given the high level of support for the proposed liquor service referred to in the PRG report, coupled with other results in that report, including that shoppers have accessed ALDI liquor elsewhere, it can be reasonably concluded that large numbers of local shoppers are currently dissatisfied with packaged liquor in their neighbourhood because ALDI liquor is not available to them in Wonthella.
- 11.9. Further submissions referring to the consumer evidence have been provided elsewhere in this document and in the applicant's Legal Submissions.
- 11.10. ALDI is a major supporter of local communities and Australian businesses. This proposition is explained by the following published ALDI policies.¹²⁰

Good Community

We are passionate about supporting the community and giving back to those in need. We have programs in place to foster strong and honest relationships with our business partners, buyers and valued team members. Our work with Camp Quality and our food charity partners are examples of how we are making a Good Difference using the resources available to us. Learn more about how we are caring for our Good Community below.

		
Community Support ALDI connects and work with charity partners through a range of employee, business partner and customer-focused initiatives.	Food Insecurity and Food Rescue ALDI works with food rescue organisations like Foodbank and OzHarvest to get surplus food from our stores to the people who need it most. Discover our initiatives and how you can get involved.	Camp Quality ALDI has been a Camp Quality partner since May 2020, making a yearly cash donation, running employee programs, and donating proceeds from product sales.

¹¹⁸ Copy available if required, upon request (and available here:

<https://www.cgg.wa.gov.au/documents/council/strategic>

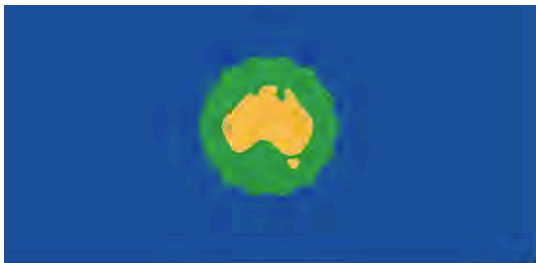
¹¹⁹ PRG report at para 4.6.3 on page 28

¹²⁰ <https://www.aldi.com.au/sustainability/good-community> (via <https://www.aldi.com.au/sustainability>), <https://www.aldi.com.au/what-makes-us-good-different> and <https://www.aldi.com.au/sustainability/good-business>



Aussie First Policy

At ALDI, we're all about homegrown goodness. In fact, 100% of our meat & eggs, 97% of fruit & veg and 82% of dairy comes from Down Under, so you know you're tucking into the taste of Good Different.



Aussie Farmers

We strongly believe in supporting Australian Made products and produce. That's why 97% of our fruit and veggies come directly from Australian farms, as well as 100% of our eggs, milk, fresh meat, fresh salmon and fresh poultry. We're also committed to supporting our Australian farmers.



Business Partnerships

When we opened our first two stores in Sydney back in 2001, ALDI initially offered a range of 600 grocery products supplied by 174 business partners. During this first year, one of these founding business partners supplied us with two types of laundry powder, which they initially delivered on a ute containing a single pallet. Fast forward to 2018, and this same business partner was supplying 75 cleaning and personal care products across 150 varieties to every one of our stores. We have hundreds of similar stories about our wonderful partnerships. With over 1000 Australian businesses now part of our network, it's easy to see how we're Making a Good Difference in more ways than one.



Economic Contribution

Data independently audited by PwC shows that ALDI had an average price gap of 15-20% in 2023, with ALDI shoppers saving \$3.4 billion on their grocery bills. But that wasn't even the most exciting part, an average family shopping at ALDI can save up to \$2,538 a year. You can access our Tax Transparency Reports below.



Modern Slavery & Human Rights

Human rights are an important dimension of ALDI's Global Sustainability Strategy, since the way we operate, purchase goods, and the business partners we choose could impact how people are treated across our operations and supply chains. As a major retailer whose supply chains touch millions of people every day, ALDI understands the importance of respecting human rights. Read more about our initiatives below.



Diversity and Inclusion

We're committed to a diverse and inclusive workforce that welcomes everyone, because we believe that understanding, respecting, and valuing the individuality of our employees and customers makes us stronger.



Responsible Business Practices

Through the responsible sourcing of our products, and prioritisation of Australian-made produce, we're helping to build resilient, thriving communities. For more information, please read our Sustainability Progress Report, which highlights how we positively impact the environment and the local communities in which we operate.

- 11.11. The grant of the liquor store licence will enhance and facilitate ALDI's increased involvement in the Wonthella community and nearby in the Midwest region. The local community will be the beneficiary of this outcome.
- 11.12. The 3km locality stands to reap many benefits from the approval of this application. The small and modest liquor service has the capacity to make a great impact in terms of choice, diversity, competition, convenience, development of the area and relevant industries and satisfying unmet consumer demand and requirement.
- 11.13. In terms of tourism, as referred to earlier in this PIA, the 3km locality attracts large numbers of visitors. The City of Greater Geraldton is an award-winning tourism destination¹²¹ with many things to see and do, events and festivals to attend and a variety of places to stay. It is described as Perth's number one day trip destination¹²². 313,000 visitors were recorded for the City in 2023¹²³. Published 2024 data reveals a total of 542,000¹²⁴.
- 11.14. The 3km locality is a cruise ship destination. "Over the 2023/24 season, Mid West Ports welcomed seven cruise ship visits, bringing a total of 8,945 passengers and crew members ashore and injecting over \$4 million into the local economy".¹²⁵
- 11.15. The approval of this application will enable ALDI to provide its full suite of products and services like it does at most of its other stores around the country and overseas, providing familiarity for tourists in the area who are accustomed to ALDI's model elsewhere. Further, the ability for ALDI to establish a full-service store will help to support and promote the 3km locality as a proper modern regional city with commonly expected retail conveniences commensurate with a location that encompasses all of the following (as referred to previously in this PIA).

¹²¹ <https://www.visitgeraldton.com.au/blog/silver-for-geraldton/15048>

¹²² <https://www.visitgeraldton.com.au/about.aspx>

¹²³ City of Greater Geraldton Overnight Visitor Factsheet 2023, Tourism WA, May 2024 (copy attached)

¹²⁴ <https://www.fra.gov.au/en/regional/local-government-area-profiles>, stated to be based on a two year average from 2023 to 2024

¹²⁵ Mid West Ports Authority Annual Report 2023/24 at page 66: <https://www.midwestports.com.au/our-port/publications/annual-reports.aspx> (copy available if required, upon request)

- 11.15.1. The city centre for the whole Midwest.
 - 11.15.2. The resource centre for the whole Midwest
 - 11.15.3. Approximately 40% of the population for the whole local government area.
 - 11.15.4. A destination for hundreds of thousands of visitors each year.
 - 11.15.5. Being hundreds of kilometres away from the next nearest resource/retail centre.
- 11.16. The ALDI Wonthella store has not kept pace with local requirements and industry trends expected in a location of its size, significance and density. Such locations ordinarily have, or are expected to have, wide choice and diversity in products and services. Approving this application will help to rectify the situation.

Form 2A “7.2 If you have any other information to provide in support of your application, include it here”

- 11.17. ALDI operates with liquor at around 350 locations across Australia. As stated previously, 36 of those are in WA. In the eastern states, nearly every ALDI store contains a liquor section.
- 11.18. The ALDI liquor model, now well-known and established in Western Australia, has been carefully designed to complement the supermarket and special buys. ALDI's particular range provides adult shoppers with superior shopping convenience through being able to access a highly diverse range of value-for-money household and consumable products at the one location.
- 11.19. There are currently 15 active packaged liquor licences to cater for approximately 15,000 people living in the 3km locality¹²⁶ plus the hundreds of thousands of visitors to the area. However, several do not sell packaged liquor at all, or in any meaningful way and only three of those licences are located within the s36B locality.
- 11.20. These numbers should be considered alongside the wide and enormous catchment of regular shoppers at ALDI Wonthella. Existing outlets do little, if anything, for shoppers at ALDI Wonthella seeking one-stop shopping and certainly do not address the demand for ALDI liquor itself.
- 11.21. The enormous number of shoppers at ALDI Wonthella each week – 8,200 on average¹²⁷ – can be considered alongside the population of the suburb of Wonthella of 1,711¹²⁸ which indicates that the ALDI store is immensely popular within the local community attracting massive numbers of people who either shop there many times a week and/or are drawn from a wider area.
- 11.22. The addition of the ALDI liquor section at the Wonthella store will, in effect, result in a self-sufficient, comprehensive retail facility. Responsible adults living locally

¹²⁶ Based on the ABS population data and Department licence information provided earlier on in this PIA

¹²⁷ PRG report at para 1.0 on page 5

¹²⁸ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51635>

will be able to browse and purchase food – fresh, frozen and non-perishable – homewares, tools, gardening equipment, clothing, leisure items, sporting gear, toys, other products and liquor all with one trolley.

- 11.23. It has been identified that among ALDI Wonthella shoppers, “almost half (40%) shoppers have previously consumed ALDI exclusive liquor products that had been purchased from another WA ALDI store ...This suggests that many shoppers are prepared to go to other ALDI stores to access exclusive ALDI liquor products. Note also that an elevated 48% of packaged liquor buyers have consumed ALDI liquor products purchased in another WA ALDI store. The closest ALDI store with a liquor licence is in Yanchep, Perth, some 370 Kms away”¹²⁹.
- 11.24. This is consistent with the reports from staff at the ALDI Wonthella store to ALDI senior corporate management that they receive regular customer requests and expectation for liquor, surprise that the store does not have the feature now and dissatisfaction at having to go without out or seek the products from another ALDI store hundreds of kilometres away.
- 11.25. The following was reported in relation to ALDI recently winning the coveted Canstar Australian Supermarket of the Year for the eighth year in a row¹³⁰:
- Notoriously, Australia’s supermarket “duopoly” of Coles and Woolworths means Aussie consumers pay some of the highest grocery prices in the OECD.
- According to Canstar, the average weekly grocery bill for an Australian household of four people has ballooned to \$240, a \$24 increase from the previous year.
- The survey, which gathered insights from 2,869 shoppers, highlights the ongoing hip pocket pain facing consumers at the checkout.
- In a statement, Eden Radford of Canstar Blue told Yahoo Finance that this year’s results reflect the power of “own-brand items” in a tough economic climate.
- ‘The quality of (Aldi’s) own-brand items reliably earn the highest rating from customers,’ she said.
- ‘Consistently priced, good quality products on offer is why shoppers are choosing Aldi to do their grocery shopping.’”
- 11.26. The large majority of ALDI’s proposed liquor range at the Wonthella store will be its reliable own-brand. Approval of the licence will make quality, affordable award-winning liquor available to the local community.

¹²⁹ PRG report para 4.4.1, page 18

¹³⁰ <https://www.skynews.com.au/lifestyle/celebrity-life/customers-know-they-can-rely-on-us-aldi-crowned-supermarket-of-the-year-for-the-eighth-year-in-a-row-by-canstar-blue/news-story/a566dfe9b507fb1c0892917532618a0d>

11.27. National Liquor News reported the following statements and quotes¹³¹ which corroborate various points made in this PIA and further support the application:

- 11.27.1. "ALDI's reputation for value attracts customers, with growth outpacing the market without relying on aggressive promotions."
- 11.27.2. "In 2024, ALDI's liquor business saw significant growth, particularly in spirits, with whisk(e)y and vodka performing strongly...Paul Handley, ALDI Liquor Expert, noted the success was partly driven by increased foot traffic from ALDI's grocery offering."
- 11.27.3. "ALDI's reputation for delivering value has been key to attracting more customers to its liquor range."
- 11.27.4. "[Paul] Handley [ALDI Liquor Expert] explained that ALDI's liquor strategy sets it apart from competitors...*'We don't try to attract customers into our stores with crazy pricing to shop our liquor offer – they are already there in large numbers to do their grocery shopping. Customers know that our tightly curated range represents great value – both across the core range as well as our seasonal and specials programmes'.*"
- 11.27.5. "Amid ongoing cost-of-living pressures, ALDI is committed to offering high-quality products at competitive prices."
- 11.27.6. "As ALDI continues to innovate and focus on value, sustainability, and growth in the liquor market, it is well-positioned for further success in 2025. *'At a time when shoppers are continuously seeking better value, we have never been more aware of the need to continue to deliver on our promise to offer Aussies the highest quality products at the lowest possible prices,'* [Paul] Handley [ALDI Liquor Expert] concluded."

11.28. To further address this section of the PIA with "other information to provide in support of [the] application", as contemplated by the Form 2A the following evidence is provided:

- 11.28.1. The City of Greater Geraldton is regarded as "an emerging global city" with a "progressive community"¹³².
- 11.28.2. The 3km locality is home to a large number of significant regional events, confirming the important role of the area as a regional centre and city.¹³³

¹³¹ "ALDI's liquor growth strategy for 2025", Deborah Jackson, National Liquor News, 15 April 2025

(<https://theshout.com.au/national-liquor-news/aldis-liquor-growth-strategy-for-2025/#:~:text=Growth%20Strategy%3A%20Plans%20to%20convert.practices%20to%20reduce%20environmental%20impact.>)

¹³² City of Greater Geraldton Annual Report 2023/2024 at page 24: <https://www.cgg.wa.gov.au/annual-reports.aspx> (copy available if required, upon request)

¹³³ For example, <https://www.cgg.wa.gov.au/events/> and City of Greater Geraldton Annual Report 2023/2024 at page 6: <https://www.cgg.wa.gov.au/annual-reports.aspx> (copy available if required, upon request)

- 11.28.3. A strategic goal of the City of Greater Geraldton is to be “economically diverse and prosperous...supporting existing businesses and attracting new investment”¹³⁴.
- 11.28.4. A mammoth Geraldton Port Maximisation Project is underway¹³⁵. “Construction has begun on a new \$52 million materials handling facility at Geraldton Port, marking the beginning of a transformative infrastructure project to future-proof the port and drive economic growth in the Mid West”¹³⁶.

12. Local packaged liquor requirements - section 36B of the Act

- 12.1. Section 36B of the Act deals with packaged liquor sold and supplied for take-away purposes for consumption off the premises and it also deals with premises authorised, or proposed to be authorised, to sell and supply packaged liquor.
- 12.2. Pursuant to section 36B(1), “packaged liquor premises means premises to which a licence referred to in subsection (2) relates”. Section 36B(2) expressly states that section 36B applies to an application for a liquor store class of licence.
- 12.3. Section 36B(4) of the Act provides that “[t]he licensing authority must not grant an application to which [section 36B] applies unless satisfied that local packaged liquor requirements cannot reasonably be met by existing packaged liquor premises in the locality in which the proposed licensed premises are, or are to be, situated”.
- 12.4. Section 36B(4) “imposes a meaningful additional hurdle”¹³⁷ to the section 38 public interest test.
- 12.5. Section 36B has been said to have been intended to “enable the licensing authority to manage the number of packaged liquor outlets where sufficient outlets already exist within a locality”¹³⁸.
- 12.6. No issue arises in respect of section 36B(3) of the Act in this case. The proposed packaged liquor service will not comprise a retail area that is anywhere near the prescribed size. Therefore, the application is eligible to be heard and determined.
- 12.7. The application for ALDI Wonthella is far from a proposal for a full and traditional liquor store licence. It is a critical factor that the packaged liquor to be available will be of a discrete and limited nature. The full ambit of “liquor” and

¹³⁴ For example, City of Greater Geraldton Strategic Community Plan 2025-2035, at page 12:

<https://www.cgg.wa.gov.au/documents/council/strategic> (copy available if required, upon request)

¹³⁵ For example, <https://www.midwestports.com.au/development/projects/geraldton-port-maximisation-project-pmaxp.aspx>

¹³⁶ <https://www.wa.gov.au/government/media-statements/Cook%20Labor%20Government/Breaking-ground-on-%24350-million-Geraldton-Port-transformation---20250510>; see also

<https://www.midwestports.com.au/news/latest/breaking-ground-on-350-million-geraldton-port-transformation/10306>

¹³⁷ Liquorland Karrinyup [75] (Archer J)

¹³⁸ Explanatory Memorandum, Liquor Control Amendment Bill 2018 at page 1

traditional liquor store features will not be available in this case, whilst several alternative features will be provided.

- 12.8. The licensing authority has determined that under section 36B of the Act a packaged liquor specialist, involving a narrow and discrete range, can be approved to hold a licence for a packaged liquor premises in appropriate cases and that an application may satisfy section 36B and be granted where the particular type of packaged liquor to be sold and supplied under the licence is limited and defined¹³⁹. Most relevantly, that has included approval of ALDI licences under the current law¹⁴⁰. This present application falls squarely within that realm and is in fact a stand-out example of such an outlet.
- 12.9. With reference to the outlet density information and evidence referred to in this PIA, the relevant “packaged liquor premises” to be considered in the context of this case in terms of section 36B are submitted to be only the following three, as referred to earlier in this PIA as being located in the s36B locality:
- 12.9.1. BWS – Beer Wine Spirits Wonthella, 44 North West Coastal Highway, Wonthella – approximately 70m away (straight line)
- 12.9.2. Con's Liquor Geraldton, Lot 86 (73) Utakarra Road, Utakarra – approximately 1.1km away (straight line)
- 12.9.3. Wonthella SUPA IGA Supermarket & Cellarbrations Liquor Store, 244-252 Fifth Street, Wonthella – approximately 1.3km away (straight line)
- 12.10. None of these existing premises does, nor is even able to, sell or supply the applicant's exclusive range.
- 12.11. The existing premises collectively sell various types of packaged liquor but no ALDI products and almost 100% of their products would never be available at the ALDI store.
- 12.12. The three premises listed are brands and banner groups well known to the licensing authority, selling a range of different, mostly mainstream common, products.
- 12.13. Only the Cellarbrations outlet provides any associated supermarket convenience and so there is a community of approximately a 1.3km radius that has no one-stop shopping facility.
- 12.14. Multiple additional factors also differentiate the existing liquor models from ALDI's, as addressed earlier in this PIA. In fact, there can hardly be any proper comparison.

¹³⁹ For example, Commune Wine Store (Maylands - 60321533920), Costco Wholesale (Perth Airport - 603213623419), Costco Wholesale (Casuarina - 603217776421), Pirate Life Perth (602213750319), Cherubino City Cellar (602215063820), Kakka Alley Brewing Co (602215442820), Casa Perth (602215763420), Gage Roads Brew Co (602216177321), Mane Osborne Park (603218426322), Commune Wine Store (Subiaco - 603220029123), Rocky Ridge Duncraig (602219804523) and Mane Bicton (603221936524)

¹⁴⁰ ALDI Yancheep (603220993723), ALDI Innaloo (603222726424), ALDI Karrinyup (603222913525) and ALDI Whitfords (603222858025)

- 12.15. Based on the information provided in the preceding sub-paragraphs, it is apparent that the available packaged liquor products and services for the enormous relevant community catchment of thousands of people are extremely limited.
- 12.16. As referred to earlier in this PIA, further beyond the s36B locality are the following within the wider 3km locality and again, none of these premises does, nor is even able to, sell or supply ALDI's exclusive range.
- 12.16.1. Geraldton Hotel, 19 Gregory Street, Geraldton – approximately 2km away (straight line)
 - 12.16.2. Corcorans Geraldton Beach Hotel, 15 Fitzgerald Street, Geraldton – approximately 1.9km away (straight line)
 - 12.16.3. Cellarbrations Central / Bullseye Birdies, 41 Chapman Road, Geraldton – approximately 1.6km away (straight line)
 - 12.16.4. Liquorland Northgate Plaza, Shop 1, Northgate Plaza Shopping Centre, lot 17 Chapman Road, Geraldton – approximately 1.5km away (straight line)
 - 12.16.5. BWS – Beer Wine Spirits Geraldton, Shops 23 and 24 (lot 32) 54 Sanford Street, Geraldton – approximately 1.4km away (straight line)
 - 12.16.6. Cellarbrations at the Queens, 79 Durlacher Street, Geraldton – approximately 1.3km away (straight line)
 - 12.16.7. Geraldton Motor Inn, 107 Brand Highway, Mount Tarcoola – approximately 2.5km away (straight line) (– with Bottlemart)
 - 12.16.8. Batavia Brewing, 60 Fitzgerald Street, Geraldton – approximately 1.9km away (straight line)
 - 12.16.9. Ocean Centre Hotel, 144 Marine Terrace, Geraldton – approximately 1.8km away (straight line)
 - 12.16.10. The Murchison Tavern, 20 Chapman Road, Geraldton – approximately 1.6km away (straight line)
 - 12.16.11. Freemasons Hotel, 79 Marine Terrace, Geraldton – approximately 1.7km away (straight line)
 - 12.16.12. Olive Tree Tavern, Lot 160 cnr Place Road and Hibertia Street, Strathalbyn (conditionally granted) – approximately 2.6km away (straight line)
- 12.17. From the list above, Olive Tree Tavern, Freemasons Hotel, The Murchison Tavern and Ocean Centre Hotel currently provide no realistic take-away liquor service. There are no dedicated packaged liquor sections at these premises.
- 12.18. Batavia Brewing sells only the liquor that it produces, for take-away.

- 12.19. Therefore, there are only seven relevant existing premises within the wider 3km locality. They sell various types of packaged liquor but no ALDI products and almost 100% of their range would never be available at the ALDI store.
- 12.20. Most of the ranges and store styles comprised within the seven relevant existing outlets are well known to the Director of Liquor Licensing. They are the typical national models commonly before the licensing authority, selling beer wine and spirits from largely mainstream producers and their own home-brand within traditional format outlets with warm and refrigerated product.
- 12.21. All of those seven outlets are located variously between 1.3 to 2.5km away from ALDI Wonthella, as the crow flies, on the opposite side of North West Coastal Highway distinctly separated from the 36B locality and location of ALDI Wonthella.
- 12.22. In relation to the BWS specifically, the Liquor Commission found in ALDI Harrisdale that there “is a significant diversity between the products sold by ALDI and the BWS store.”¹⁴¹
- 12.23. The small size, layout, location, absence of coolroom, absence of prominent product advertising, absence of refrigeration, reduced trading hours at ALDI are glaring additional differences over and above the major distinction of ALDI's mainly exclusive range.
- 12.24. The following extracts of research and conclusions referred to in the expert PRG consumer survey are particularly relevant to this section of the PIA:

Buyers of take away liquor products were asked whether they believed that the proposed ALDI liquor section would be different from outlets already available in Wonthella. The question asked was:

“Do you think that the liquor service proposed at Wonthella ALDI will be different from existing packaged liquor outlets already operating in and near Wonthella?”

In the main, the sample was familiar with a typical ALDI liquor section. It may be recalled from section 4.4 that 82% of the shopper sample had previously shopped in an ALDI store that included a liquor section, and in section 4.4.1 that 40% had consumed an ALDI liquor product purchased from a WA ALDI store. So the great majority of responses to this question are based on personal exposure to the ALDI liquor offer.

It is not surprising therefore to find in the table below that almost 7 in 10 (69%) of packaged liquor buyers believe that a liquor section in the Wonthella ALDI store would be different from the current liquor outlets within the 3km locality. This proportion is slightly elevated to 74% amongst liquor buyers who have been in a licensed ALDI store, and increases to 85% amongst those who have consumed ALDI liquor products purchased in a WA ALDI store.

142

...

¹⁴¹ [43(g)]

¹⁴² PRG report at para 4.6.2 on page 27

Packaged liquor buyers were asked to estimate the extent to which they would purchase their packaged liquor requirements from a liquor section within the Wonthella ALDI store.

The question asked was:

“On average, how often would you make liquor purchases from the Wonthella ALDI supermarket?”

The table below shows the great extent to which the proposed liquor section would be used by packaged liquor buyers.

Frequency Would buy Liquor products from the ALDI Liquor Section	Packaged Liquor Buyers
Don't buy packaged liquor	1%
Once or more a week	31%
Once or more a fortnight	17%
Once or more a month	21%
Less often	23%
Don't Know	7%
Total	100%
Sample	243
Summary	
At Least 1 / fortnight	49%
At Least 1 per month	70%
At least sometimes	92%

It is clear that the great majority of packaged liquor buyers who currently shop at Wonthella ALDI would shop for their packaged liquor requirements from the ALDI liquor section if it was established. Almost half (49%) would do so at least once a fortnight, 70% at least once a month and 92% on at least some occasions, should the liquor section be established within the Wonthella ALDI store.

The clear suggestion is that the Wonthella ALDI liquor section would better meet their packaged liquor requirements than the currently available Wonthella liquor outlets.

143

- 12.25. The percentages in the results above of 49% fortnightly, 70% monthly and 92% sometimes equate to approximately 4,018, 5,740 and 7,544 shoppers respectively based on the average weekly shopper number of 8,200 at ALDI Wonthella as referred to earlier in this PIA. These are enormous numbers of likely ALDI liquor shoppers at Wonthella confirming the need and requirement.
- 12.26. The nearest ALDI liquor service for people in or near Wonthella is in Yanchep approximately 323km away (straight line). It is far from realistic or reasonable to expect those seeking ALDI liquor from the relevant area to have to travel to Yanchep.

¹⁴³ PRG report at 4.6.3, page 28

- 12.27. Given the growth and development of the 3km locality in recent years and contemporary expectations for a bustling, built-up regional city, it is essential that the community have ready access to usual modern conveniences. It is unreasonable for people living in, working in and visiting the area to be denied meaningful choice, diversity and competition.
- 12.28. It is an essential consideration in this case that “the phrase ‘requirements of consumers for packaged liquor’ in the definition of ‘local packaged liquor requirements’ in s 36B(1) of the Act is *not* limited in its scope to the physical item or product of packaged liquor”¹⁴⁴.
- 12.29. The evidence of the requirements of consumers, as referred to in this PIA, is very clearly that they require the applicant's particular range and associated products, services and style of operation to be available to purchase for take-away purposes from the ALDI Wonthella store.
- 12.30. Almost 100% of the applicant's stock range will be unavailable elsewhere in the 3km locality and beyond up to approximately 323km. This is a striking factor in this case.
- 12.31. To reiterate, the following are key distinguishing features of the ALDI liquor proposal:
- 12.31.1. The majority of ALDI's products are exclusive and not available at any of the other liquor outlets.
 - 12.31.2. The liquor display/browse area will only comprise only approximately 30m², which is significantly smaller than the other packaged liquor outlets. The bespoke ALDI liquor service will be an ancillary but highly valuable component of its overall service in Wonthella which is projected to be very popular and well patronised.
 - 12.31.3. There will be no refrigerated liquor products at ALDI Wonthella. This is a harm minimising feature of the ALDI liquor service and speaks to its genuine intention to complement its household and grocery offering.
 - 12.31.4. None of the other packaged liquor outlets can offer one-stop-shopping convenience to ALDI shoppers.
- 12.32. Further and more detailed submissions regarding section 36B of the Act are contained in the applicant's Legal Submissions.

13. Sections 5, 33, 36B, 38 and 60 of the Act

- 13.1. Relevant provisions of the Act have been taken into consideration in the preparation of the application, including sections 5, 33, 36B, 38 and 60. Submissions addressing those and other relevant provisions in the Act have been briefly referred to in this document but are detailed in a separate set of Legal Submissions accompanying this PIA.

¹⁴⁴ Liquorland Karrinyup [108] (Archer, J)

- 13.2. It is respectfully submitted that the licensing authority should be easily satisfied that in relation to ALDI Wonthella, as was concluded in relation to other ALDI applications decided under the current law, that the applicant has far exceeded the legislative high bar because the evidence shows substantially more than “trifling” and “considerable” requirements¹⁴⁵.

14. Conclusion

- 14.1. With this document the applicant has sought to answer the Form 2A and relevant sections of the Act in full measure, with pointed reference to specifics of the application.
- 14.2. Wide-ranging public interest factors, both positive and negative, have been identified and assessed, with a resulting comprehensive proposal for the grant of the licence and ETP.
- 14.3. To reiterate, what is proposed is a modest liquor range comprising largely of award winning, value-for-money, exclusive products, through a modern one-stop-shop concept that has the potential to offer an unrivalled level of convenience for shoppers in Wonthella and has been proven very popular elsewhere. The proposal is a replica of the Australian Supermarket of the Year for the last eight consecutive years¹⁴⁶ and incorporates multiple low risk features.
- 14.4. The ALDI Wonthella liquor service will be genuinely unique, not only in the s36B locality but also in the 3km locality and far beyond for hundreds of kilometres. The products, services and style of operation at ALDI Wonthella will be very totally different from what currently exists in the local market.
- 14.5. This PIA, together with the attachments referred to within and accompanying Legal Submissions, provide strong support for the application. The evidence includes compelling expert consumer survey results showing that several thousand shopper visits are expected to the proposed liquor section regularly, including fortnightly and monthly.
- 14.6. The licensing authority should be able to find as follows in this case, just as it did in ALDI Harrisdale – which findings still have relevance in the era of section 36B of the Act – where the liquor store model in question is virtually the same:

“The granting of a licence for the selling of packaged liquor in a floor space of [43] square metres would not result in a proliferation of liquor stores within the locality or a proliferation of liquor within the locality. To the contrary, given the nature of products to be sold by the applicant it will add to the diversity of products on offer and allow greater choice for

¹⁴⁵ Liquorland Southern River [136] [137] (Lemonis J)

¹⁴⁶ <https://www.roymorgan.com/findings/roy-morgan-unveils-annual-customer-satisfaction-award-winners-across-all-categories-2023>; <https://www.skynews.com.au/lifestyle/celebrity-life/customers-know-they-can-rely-on-us-aldi-crowned-supermarket-of-the-year-for-the-eighth-year-in-a-row-by-canstar-blue/news-story/a566dfe9b507fb1c0892917532618a0d>

consumers of liquor, thus being consistent with the primary object set out in section 5(1)(c) of the Act.”¹⁴⁷

- 14.7. The 3km locality has evolved into a booming, modern regional city and yet it lacks contemporary choice and diversity in packaged liquor options, which the grant of this application can address.
- 14.8. Further submissions addressing conclusions to be drawn from the information contained in this PIA and supporting the grant of the licence and ETP as proposed are contained in the applicant's detailed set of Legal Submissions.

Dated 18 September 2025



Jessica Patterson Law & Consultancy Pty Ltd
Law practice acting for the applicant

Attachments	
No.	Title/description
1.	PRG report
2.	Offence Data Summary
3.	City of Greater Geraldton Overnight Visitor Factsheet 2023, Tourism WA, May 2024
4.	Stocklist, including identification of the ALDI exclusive products (subject to change)
5.	List of awards received by ALDI
6.	9 News Perth Facebook, 15 June 2016
7.	Legal Submissions dated 18 September 2025

¹⁴⁷ [42]