

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 Events Approvals policy](#)). The DLL can also ask for a PIA to be prepared as part of the application for any type of liquor licence or permit.

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.

Your completed PIA will be made publicly available and may be advertised on the [LGIRS 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

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).

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 our [Portal Homepage](#).

PART 1 – Application Details

Applicant name: **ALDI Foods Pty Limited**

What licence or permit type are you applying for? **Liquor store**

Are you applying for:

☒ New licence

☐ Removal of existing licence

Licence/permit type:

Premises trading name: **ALDI South Fremantle**

Address of proposed premises: **ALDI South Fremantle, 24/219 (lot 303) Hampton Road, South Fremantle WA 6162**

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 attached 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 attached 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 attached 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 attached 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 attached Annexure prepared by Jessica Patterson Law & Consultancy Pty Ltd

PART 5 – Impact on the amenity, quiet or good order of the locality

A well designed premises will make it easier to prevent negative impacts on the locality.

For example if a premises is:

- in good repair, well lit, with operational CCTV and designed to allow passive surveillance of areas such as the car park and entrances, it will tend to discourage anti-social behaviours such as vandalism or crime
- 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 attached 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.

6.1 What actions will you take to minimise the impact on people who live or work nearby?

Please refer to the attached Annexure prepared by Jessica Patterson Law & Consultancy Pty Ltd

[illegible]

PART 7 – Impact on tourism, culture and the community

When making licensing decisions under the LC Act, the DLL is required to consider the proper development of the liquor industry, the tourism industry and other hospitality industries in the State.⁶ This is your opportunity to expand on how the grant of your application would result in positive developments to tourism, culture and the community. This could include increased local employment opportunities, the provision of unique entertainment or food options, and the creation of new leisure opportunities in the area.

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

Yes. Please refer to the attached Annexure prepared by Jessica Patterson Law & Consultancy Pty Ltd

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

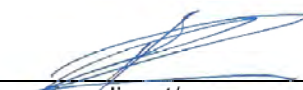
Please refer to the attached Annexure prepared by Jessica Patterson Law & Consultancy Pty Ltd

⁶ LC Act s5(1)(c).

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**

19th June 2026
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**

in respect of premises situated at

24/219 (lot 303) Hampton Road, South Fremantle

to be known as

ALDI South Fremantle

Public Interest Assessment Form 2A Annexure

including section 36B submissions



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

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1. Executive summary

- 1.1. This application, by Australia's eight-time winner of the national Supermarket of the Year award¹, seeks to establish an incredibly popular and strongly demanded take-away liquor service from a small and discrete area to be located inside the existing ALDI South Fremantle store.
- 1.2. The liquor range, comprising many award-winning products, will be almost entirely exclusive to ALDI. It has been proven to be in great demand in South Fremantle. The relevant community currently needs to drive approximately 7km one-way, through busy built-up districts, to access that product range.
- 1.3. The applicant's unique liquor store model is well-known, sought-after by the public and has been previously approved at several other locations in WA where there have been excellent compliance and responsible trading records.
- 1.4. The location for this proposed petite liquor service is perfect, being part of a very established shopping precinct, Neighbourhood Centre and bustling district.
- 1.5. The application is supported by a substantial volume of compelling evidence which goes far above and beyond the level required to justify the grant².
- 1.6. The expert market researcher has made the following key findings, among others:

“[A]lmost three in four (70%) packaged liquor buyers believe the ALDI South Fremantle liquor offer will be different to those currently available, and that almost all of them plan to meet their packaged liquor needs in the ALDI South Fremantle liquor section, should it be established. Evidently the ALDI offer will better suit their packaged liquor purchasing needs than the range of outlets currently available to them.”³
- 1.7. The high percentages of shoppers wanting the ALDI South Fremantle liquor service translate to thousands of people based on the expert survey modelling⁴.
- 1.8. A demand/supply analysis of relevant factors in this case reveals that demand cannot reasonably be met by supply, justifying the grant of the licence⁵.
- 1.9. The applicant is well-known, highly sophisticated and enjoys an excellent trading compliance record proving that it is entirely capable of establishing and operating the liquor service proposed.

¹ <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>

² *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* [2024] WASC 128 (**Liquorland Southern River**) [128] [137] (Lemonis J)

³ Survey Of The Consumer Requirement for Liquor Retailing Amongst shoppers in The ALDI Supermarket in South Fremantle, by Patterson Research Group (**PRG**), dated February 2025 (**PRG Report**) (attached), at page 6. PRG and Jessica Patterson Law & Consultancy Pty Ltd are totally unrelated entities. The commonality of the name “Patterson” is purely coincidental.

⁴ PRG report at para 1.0, page 5 and see also page 13

⁵ *Liquorland Southern River* [57] (Lemonis J)

2. Introduction and background

- 2.1. ALDI Foods Pty Limited (ACN 086 210 139) (**ALDI**⁶) seeks the conditional grant of a liquor store licence pursuant to sections 33, 36B, 38, 47 and 98D of the Liquor Control Act 1988 (WA) (**Act**) for a very small section of its established supermarket at 24/219 (lot 303) Hampton Road, South Fremantle.
- 2.2. This document has been prepared as an annexure to and in accordance with the Public Interest Assessment Form 2A published by 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 Department policies.
- 2.3. As directed by the Department⁷, the applicant has applied a "common-sense approach"⁸ to the preparation of the PIA. Further, the applicant has considered the State Government's published intention that it be less complicated and "easier to do business"⁹ within the WA liquor licensing regime. The applicant has provided a level of detail in this document and with the attachments that is not overly voluminous and which is considered appropriate for the circumstances. 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 evidence¹⁰. Further detail, additional copies of source material and supplementary supporting evidence can be provided if necessary and requested. As contemplated in the Public Interest Assessment information factsheet/policy¹¹, the Department is invited to request further detail should such material be considered necessary.
- 2.4. Hundreds of members of the public have provided evidence of strong demand for the ALDI liquor service at the South Fremantle store through the expert survey by PRG. This evidence is based largely on consumers' first-hand knowledge of the proposed liquor model. The PRG report states that "75% [of shoppers surveyed] indicate that they have previously shopped in (another) Western Australia ALDI that had a liquor section, and 60% reported that they had consumed exclusive ALDI liquor products purchased from another WA ALDI store with a liquor licence...These experiences served to ensure that, in the main, shoppers' comments on and attitudes towards aspects of the proposed ALDI liquor section were based on first-hand knowledge of the ALDI liquor retailing environment and products".¹²

⁶ Including related entities forming the ALDI group

⁷ Form 2A and at <https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

⁸ Form 2A page 2

⁹ 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>

¹⁰ Liquorland Southern River [126] and [128] (Lemonis J)

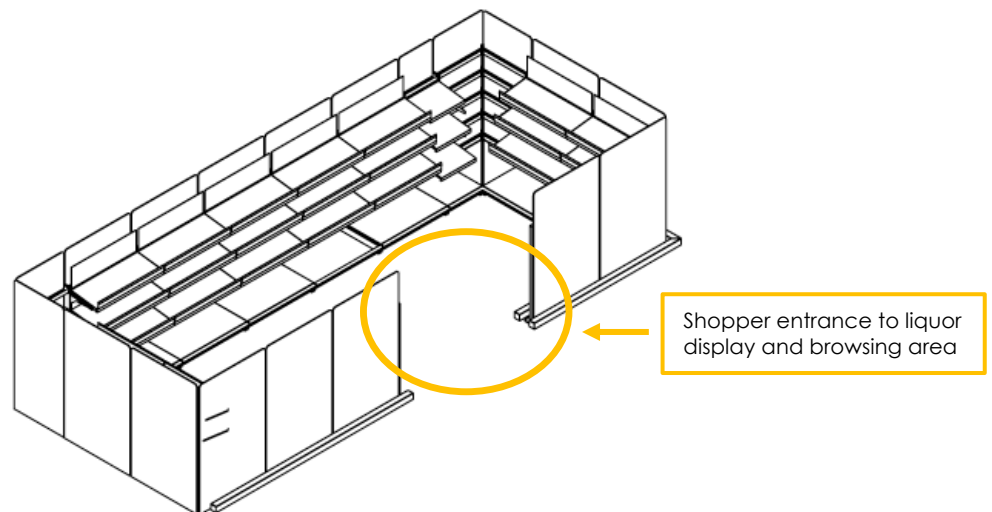
¹¹ <https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

¹² PRG report at page 6

- 2.5. The applicant is entirely capable of and keen to address the community requirement as soon as possible after approval is granted.
- 2.6. This PIA has been formally adopted and verified by a senior WA representative of ALDI by way of signing the covering Form 2A.

3. Brief outline of the application

- 3.1. This application involves a petite liquor display/browse and checkout section of only approximately 38m² within the ALDI South Fremantle store.
- 3.2. A small, 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 wider ALDI South Fremantle store. The size, layout and style of operation will be almost identical to the 40 existing ALDI licences trading in WA.
- 3.3. This liquor 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 attractive range of ALDI's unique non-liquor products, services and facilities. This creates an exceptional one-stop-shopping experience for customers, which is a key feature of the ALDI offering.
- 3.4. The aerial render below is indicative of what is proposed as the liquor display/browse area in South Fremantle. The gap in the boundary wall that is depicted is the entry point where shoppers may walk in and out, with trolleys if they wish. The checkout – not depicted in the following sketch – is located immediately in front of the entrance to the display and browsing area.



- 3.5. The boundary partitioning is proposed to be made of 2.1 metre high opaque frosted glass as shown in the subsequent photo below taken at an existing ALDI store with an approved liquor section.



- 3.6. Additional details of the ALDI liquor offering are provided further on in this PIA.
- 3.7. The hundreds of local shoppers who have provided evidence of their requirement for the proposed liquor service in the South Fremantle store have encouraged ALDI to lodge this application and seek approval to provide liquor there as soon as approval might be given.
- 3.8. Residents of South Fremantle and the wider surrounding community will have the opportunity to enjoy the full range of ALDI's offering 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 already 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 602 stores in Australia.
- 4.2. ALDI 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 organisation¹³.

"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 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 and packaged food 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 consumers¹⁴.

4.6. Some of ALDI's published principles and values include the following:

4.6.1. "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 Business."¹⁵

¹³ <https://sustainability.aldisouthgroup.com/about-aldi/aldi-history> (see also <https://www.aldicareers.com.au/about-aldi/>)

¹⁴ 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."

¹⁵ <https://www.aldi.com.au/sustainability>

- 4.6.2. "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 more."¹⁶
- 4.6.3. "We're not like other supermarkets. We do things differently to give you the lowest possible prices on the best quality products¹⁷."
- 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.



We're selective about our selection.

With a refined range and less shelf space than other supermarkets, we're extra particular about the products we stock. That's why every ALDI product undergoes stringent sampling and assessments conducted by our expert Buying and Quality Teams, to ensure it deserves a spot on our shelves.



So what do we mean by that?

We put ALDI's exclusive products up against the market leaders of their category. Comparing and rating them to make sure we are delivering on the quality attributes that consumers love.

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How do we do this?

We have a dedicated Team which takes product photos, measurements and verifies any cooking instructions, as part of the process. They also make notes on things like taste, texture, aroma, flavour and more.



Tweak, taste, test, repeat.

We review our product submissions for as many rounds as it takes to get the most perfect product possible. In these reviews our Quality Team evaluates technical product details such as nutritional value, sensory attributes and product claims. All the information you rely on to inform your shopping choices and quality purchases at ALDI.



Quality control.

We don't just stop once our products hit the shelves. We routinely review every ALDI product against the agreed specifications. What can we say? We're quality freaks. We hold our suppliers to account so you can rely on consistent quality, each and every time you shop. Our Sampling Program ensures ALDI's exclusive products remain competitive and in line with market trends.

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¹⁶ <https://www.aldi.com.au/sustainability/good-business>

¹⁷ <https://www.aldi.com.au/what-makes-us-good-different>

¹⁸ <https://www.aldi.com.au/what-makes-us-good-different/quality>

¹⁹ <https://www.aldi.com.au/what-makes-us-good-different/quality>

- 4.8. Most of ALDI's products are exclusive to ALDI. They are often special versions of mainstream big-brand items which are adapted and manufactured according to ALDI's particular and strict specifications to ensure quality, value-for-money and uniqueness to ALDI. Expressi Coffee is one of the most popular non-liquor examples. ALDI's Expressi Coffee capsule machine and coffee capsules have won numerous awards. ALDI's exclusive range of Lazzio coffee beans recently won the top award at the world's largest premier coffee roasting competition, the 2026 Golden Bean World series²⁰.
- 4.9. The majority of ALDI's exclusive products that are available in Australia are sourced from Australian suppliers. As explained in more detail further on in this PIA, ALDI operates with a passionate "Aussie First Policy"²¹.
- 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.

ALDI Special Buys™

Flat screen televisions, furniture, clothing, appliances, BBQs, tools, gardening equipment, trade equipment, vacuums, camping gear and toys are just some of the category 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 news²².



ALDI'S NEW SNOW GEAR REVEALED 🎉 It's one of the most anticipated shopping launches of the year. Your first look at Aldi...

²⁰ <https://www.aldiunpacked.com.au/aldi-australias-coffee-takes-top-honours-at-golden-bean-world-series/> and <https://www.skynews.com.au/australia-news/aldi-2999-product-takes-home-gold-in-worldwide-competition/news-story/5528c675c4466dd67727166ecb07928e>

²¹ <https://www.aldi.com.au/what-makes-us-good-different>

²² For example, as per the screenshot image depicted – Channel 7 Sunrise breakfast show on 15 May 2025 (<https://www.facebook.com/Sunrise/videos/aldis-new-snow-gear-revealed-%EF%B8%8F-its-one-of-the-most-anticipated-shopping-launches/1281166824012844/>) and see also 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>)

- 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 is not replenished.
- 4.12. ALDI special buys are displayed in the now renowned middle aisle of every store.
- 4.13. The following images show samples of relatively recent catalogue-advertised special buys that have been available at the ALDI South Fremantle store, by way of example.





4.14. The following are further examples:

 While Stocks Last FERREX 20V Xfinity 6 Piece Set \$199.00	 While Stocks Last DELTA Smart Lock Portable Key Safe \$89.99	 While Stocks Last FERREX Cordless Screwdriver \$24.99	 While Stocks Last FERREX Table Top Saw \$149.00	 While Stocks Last AMBIANO Multi Snack Maker \$39.99
 While Stocks Last STIRLING 60cm Glass Induction Cooktop \$179.00	 While Stocks Last STIRLING 60cm Slide Out Rangehood \$99.00	 While Stocks Last STIRLING 80L Designer Built-In Oven \$249.00	 While Stocks Last CASALUX Garden Solar Lights \$14.99	 While Stocks Last GARDENLINE Hose Cleaning Attachments \$24.99

4.15. These images show that an enormous and diverse range of popular consumer items will be available at exceptional value-for-money prices. Sometimes the

special buys include a small selection of liquor. The following shows recently available special buys of liquor, by way of example.



SHAKE, STIR, CELEBRATE

A Cocktail Shaker and Bar Tools Set \$24.99
• Set includes a 700ml shaker, 300ml cocktail glass, jigger, pulp strainer, bar spoon, cocktail picks, apron and wooden muddler.
• Available in Gold or Stainless Steel colours.

B Cocktail Glasses 6pk Set 2pk \$8.99
• 6pk box packaging with fun recipe cards included.

C Metro Cocktail Co. Mimosa \$10.99
• 300ml • Cold or Warm • Lemon Flavour • 40% ABV

D Metro Cocktail Co. Mimosa \$10.99
• 300ml • Cold or Warm • Lemon Flavour • 40% ABV

E Fever-Tree Wild Raspberry Tonic Water 750ml \$4.49
• 50% ABV

F Fever-Tree Elderflower Tonic Water 750ml \$4.49
• 50% ABV

G Fever-Tree Espresso Martini or Margarita Premium Mixers 500ml \$5.99
• 50% ABV

H Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

I Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

J Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

K Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

L Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

M Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

N Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

O Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

P Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

Q Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

R Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

S Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

T Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

U Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

V Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

W Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

X Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

Y Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

Z Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

SHAKE, STIR, CELEBRATE

A Cocktail Shaker and Bar Tools Set \$24.99
• Set includes a 700ml shaker, 300ml cocktail glass, jigger, pulp strainer, bar spoon, cocktail picks, apron and wooden muddler.
• Available in Gold or Stainless Steel colours.

B Cocktail Glasses 6pk Set 2pk \$8.99
• 6pk box packaging with fun recipe cards included.

C Metro Cocktail Co. Mimosa \$10.99
• 300ml • Cold or Warm • Lemon Flavour • 40% ABV

D Metro Cocktail Co. Mimosa \$10.99
• 300ml • Cold or Warm • Lemon Flavour • 40% ABV

E Fever-Tree Wild Raspberry Tonic Water 750ml \$4.49
• 50% ABV

F Fever-Tree Elderflower Tonic Water 750ml \$4.49
• 50% ABV

G Fever-Tree Espresso Martini or Margarita Premium Mixers 500ml \$5.99
• 50% ABV

H Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

I Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

J Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

K Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

L Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

M Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

N Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

O Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

P Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

Q Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

R Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

S Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

T Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

U Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

V Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

W Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

X Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

Y Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV

Z Fever-Tree Tonic Water 4 x 200ml \$5.99
• 50% ABV



4.16. Other items currently in the range include the following:

 MARQUES DEL ATRIO Rioja Reserva Tempranillo Graciano... \$12.99	 O'DONNELLS Irish Country Cream 700ml \$14.99	 O'DONNELLS Irish Cream Salted Caramel Liqueur 700ml \$12.99	 CORTE CARISTA Prosecco Spumante DOC 750ml \$11.99	 VEUVE OLIVIER Sparkling Wine 750ml \$8.99
 CHATEAU LES MAURINS Bordeaux 750ml \$12.99	 VEUVE MONSIGNY Champagne Brut 750ml \$34.99	 CORTE CARISTA Prosecco Rosé DOC Millesimato 750ml \$11.99	 While Stocks Last ST HALLETT Faith Barossa Shiraz 2024 750ml \$12.99	 VALLEE DES SECRETS Sparkling Cuvée NV 750ml \$14.99
 THE POND Cabernet Sauvignon 750ml	 KAIOORA BAY Reserve Marlborough Sauvignon Blanc 750ml	 SOUTH POINT ESTATE Pinot Grigio 750ml	 BROOKE JAMES Shiraz Cask 2L	 BROOKE JAMES Semillon Sauvignon Blanc Cask 2L

Public Interest Assessment
Form 2A Annexure
Application for liquor store licence
ALDI South Fremantle

				
PRECIOUS EARTH Shiraz 750ml	A.C. BYRNE & CO. Margaret River Chardonnay 750ml	A.C. BYRNE & CO. McLaren Vale Organic Shiraz 750ml	SOUTH POINT ESTATE Moscato 750ml	NEVE Marlborough Sauvignon Blanc 750ml
\$3.49	\$10.99	\$9.99	\$4.99	\$7.99
				
THE POND Pinot Grigio 750ml	ONE ROAD Padthaway and Cowra Chardonnay 750ml	ONE ROAD South Australia & Heathcote Shiraz 750ml	CORTE CARISTA Chianti Superiore 750ml	ONE ROAD Goulburn Valley & King Valley Cabernet Merlot..
\$5.99	\$7.99	\$7.99	\$11.99	\$7.99
				
SOUTH POINT ESTATE Sparkling Chardonnay Pinot Noir NV 750ml	SOUTH POINT ESTATE Pink Moscato 750ml	HIGHLAND EARL Blended Scotch Whisky 700ml	LITTLE BIRDWOOD Semillon Sauvignon Blanc 750ml	TAMOVA Quadruple Distilled Vodka 700ml
\$5.99	\$4.99	\$41.99	\$4.99	\$37.99
				
L'EXPRESSION Pinot Gris 750ml	LES ANGELIERES Pinot Noir 750ml	THE POND Merlot 750ml	TAYLORS Chardonnay 2023	SOUPCON DE FRUIT Rose d' Anjou 2024 750ml
\$10.99	\$11.99	\$5.99	\$14.99	\$9.99
				
SMART DOG Smart Dog Portuguese Shiraz Alicante Bouche...	TATACHILLA Light and Fresh Sauvignon Blanc 750ml	PRECIOUS EARTH Semillon Sauvignon Blanc 750ml	SOUTH POINT ESTATE Rosé 750ml	WYNNS Coonawarra Cabernet Shiraz Merlot Malbec...
\$7.99	\$9.99	\$3.49	\$4.99	\$11.99
				
THE VENTURER SERIES Pinot Grigio 750ml	SANDARA Sparkling Sangria 750ml	COLLEZIONE ORO Asolo Prosecco Superiore D.O.C.G. 750ml	SOFI The Bellini 750ml	RIVET Lager Beer 24x330ml

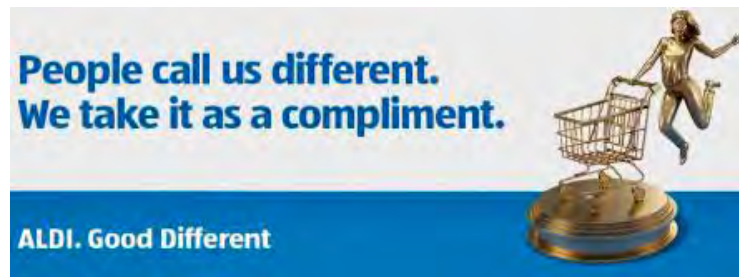
 A.C. BYRNE & CO. Margaret River Cabernet Sauvignon 750ml \$10.99	 NORTH OF NOWHERE Pacific Ale 12x330ml \$23.99	 NORTH OF NOWHERE Pale Ale 12x330ml \$23.99	 On Sale Wed 24 June GUINNESS Draught 6x470ml \$24.99	 BREWDOG Hop Fiction 4x375ml \$14.99
 BREWDOG Punk XPA 4 x 375ml \$14.99	 GONE NORTH Super Crisp 24x375ml \$39.99	 AMBER ORCHARD Apple Cider 4x375ml \$7.99	 On Sale Wed 24 June MEWILLIAMS Mack's Green Ginger Wine 750ml \$10.99	 On Sale Wed 24 June HARD RATED Vodka Red Pub Soda Cans 6x330ml \$25.99
 On Sale Wed 24 June Chillable Red Syrah Pinot Noir 750ml \$14.99	 On Sale Wed 24 June Dry Gin 700ml \$59.99	 On Sale Wed 24 June VODKA O Vodka 700ml \$44.99		

4.17. 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 optimum operational efficiency. The following are but a few examples of ALDI's in-store operations which heighten productivity, reduce waste and enable highly competitive value-for money pricing to be maintained.

- 4.17.1. 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.
- 4.17.2. Products in ALDI stores are displayed on re-usable standardised 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.
- 4.17.3. 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 at the point of sale.

- 4.17.4. Customers are required to pack their own shopping bags at the checkout and a dedicated bagging 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.
- 4.18. ALDI's business is incredibly systemised and disciplined. The shelving, storage methods, displays, product placement and other logistical aspects are carefully designed to sync and coordinate with each other to achieve optimum operational efficiencies. As a result, ALDI is able to reduce operating costs and provide better services, facilities and pricing for its customers.
- 4.19. 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 otherwise 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.
- 4.20. Consistent pricing is indicative of consistent quality. ALDI does not downgrade its products through heavy discounting. The applicant is driven by quality and consistency. In this regard and in terms of liquor especially, ALDI's products very much represent true value-for-money. High quality award winning liquor items are provided at prices accessible to most people.
- 4.21. Approval of this application for the ALDI South Fremantle store will provide local people with fair and equal access to superior standard, award-winning liquor.
- 4.22. ALDI's approach to business is neatly encapsulated in its "Good Different" slogan, launched in 2017, which is also an operational philosophy. 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."²³

²³ <https://insidemcga.com.au/2017/05/15/aldis-good-different-campaign/>



- 4.23. ALDI is a responsible and sophisticated corporate citizen and operates pursuant to elevated standards and key performance indicators, which include the following published principles and policies²⁴.
- 4.23.1. Price Promise
 - 4.23.2. Aussie First Policy
 - 4.23.3. Sustainability (- Good Planet, Good Community, Good Health and Good Business)
- 4.24. 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 supermarkets²⁵.
- 4.25. ALDI's pursuit of excellence and quality in all things is evident in the many awards it has won²⁶, including in Australia, Canstar Blue Most Satisfied Shoppers – Supermarkets 2014-2016 and 2018-2023 and Roy Morgan Supermarket of the Year for the last eight consecutive years²⁷. More specifically, ALDI is also an award-winning retail liquor supplier²⁸.
- 4.26. 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"²⁹.
- 4.27. There should be no question as to the credibility of Canstar Blue awards and certainly no doubt that ALDI customers are immensely satisfied with the products and services provided by ALDI which include liquor.

²⁴ <https://www.aldi.com.au/what-makes-us-good-different>

²⁵ <https://www.roymorgan.com/findings/9666-risk-monitor-quartely-update-june-2024>

²⁶ <https://www.aldiunpacked.com.au/?s=awards>

²⁷ <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>

²⁸ Including, Canstar Blue Most Satisfied Customers – Liquor Retailer 2021 and Roy Morgan Liquor Store of the Year in 2018

²⁹ <https://www.canstarblue.com.au/about-us/>

- 4.28. The Australian Liquor Stores Association has said that Australian “shoppers have migrated towards the value messaging of Aldi”³⁰.
- 4.29. “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”.³¹
- 4.30. 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.
- 4.31. Since ALDI commenced Australian operations in 2001, when the first ALDI store opened in Sydney, 602 stores throughout Australia have been opened, including 54 in WA since the first was opened in WA on 8 June 2016. The large majority of ALDI’s stores throughout the country include a liquor component. In WA there are 40 ALDI stores currently trading with a liquor section.
- 4.32. The ALDI liquor service was made available in WA from the end of August 2017 at five locations initially. Since then, the applicant has had an excellent compliance record alongside significant growing consumer popularity and demand.

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 in South Fremantle 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 to 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 with new products that become available to ALDI, as it responds to customer requirements and when occasional specialty items are offered. Generally, the liquor service at ALDI South Fremantle will 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.

³⁰ ALSA – IRI State of the Industry Report, March 2017 at page 14 - copy available if required, upon request

³¹ 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.³²
- 5.6. In recognition of the launch of the ALDI liquor service in WA, renowned wine expert Ray Jordan was invited at that time 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 Heathcoate Shiraz 2015, was "damn good"³³. That Shiraz has also won several 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 just some of the awards received and the following sub-paragraphs reference an additional two, more recent, awards not listed in the attachment:
- 5.7.1. 2024 Spirits International Prestige Awards – platinum and gold medals plus Consumers' Choice Award for ALDI's Highland whiskey range³⁴
- 5.7.2. 2025 Melbourne International Wine Competition – 18 awards including a gold medal for ALDI's South Point Estate Pinot Grigio.³⁵
- 5.8. The following are just some of the numerous published reports attributed to ALDI's superior quality award-winning liquor:

ALDI Australia has earned a reputation for delivering top-quality liquor products that rival premium brands while maintaining affordable prices. This commitment has garnered them numerous accolades in international competitions, proving that great taste doesn't have to come with a high price tag.

ALDI partners with renowned Australian and international suppliers to ensure exceptional quality across its liquor range. These

³²<https://www.bestwinesunder20.com.au/jason-bowyer-aldis-wine-whisperer/>

³³ <http://www.perthnow.com.au/news/western-australia/aldi-will-start-selling-alcohol-in-perth-stores-from-today/news-story/c59014afc215ba475dd1265a0e89eb4c>

³⁴ <https://www.aldiunpacked.com.au/aldis-whisky-scores-top-honours-at-prestigious-international-spirits-awards/> and <https://www.news.com.au/lifestyle/food/drink/aldi-whiskey-wins-top-honour-in-prestigious-global-awards/news-story/5724c8e3e2619d7eeb3726e8f0eafcf3>

³⁵ <https://melbourneinternationalwinecompetition.com/winners/2025-winners/> and <https://drinksdigest.com/2025/09/22/aldi-budget-pinot-grigio-wins-gold/>

collaborations are built on trust, expertise, and shared goals. ALDI takes an active role in the development of products, ensuring every single one meets its stringent standards³⁶

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."

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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.

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- 5.9. One of the most unique aspects of the ALDI liquor offering is the exclusive range itself and the story behind it. The range is made-to-order for ALDI stores and not available at any other packaged liquor outlet. As stated previously, the large majority of ALDI's range is unique and exclusive to ALDI. Shoppers simply cannot access those items at any non-ALDI outlet.

³⁶ London Spirits Competition: <https://londonspiritscompetition.com/en/blog/insights-1/how-aldi-australia-creates-award-winning-liquor-products-972.htm>

³⁷ <https://7news.com.au/lifestyle/food/bargain-30-aldi-vodka-picks-up-top-award-at-the-global-vodka-masters-2022-c-8149807>

³⁸ <https://www.bhg.com.au/aldi-scotch-whiskey-award>

- 5.10. In order to become an ALDI exclusive product, the producer needs to enter 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.
- 5.11. The ALDI exclusive products differ significantly from the Woolworths and Coles private-label liquor ranges. Woolworths and Coles generally purchase the whole production entity and associated facility in many cases and the products from those facilities then become what are often known as private-label liquor items, effectively produced by/under the direction of Woolworths and Coles or their related entities.
- 5.12. These Woolworths' and Coles' products have also been described as "phantom brands [which] are essentially home brands in disguise. They are created by supermarkets to give the impression of diversity and choice on their shelves. Phantom brands are different to "own brand" because they do not display the supermarket's brand or logo, creating the impression of being independent brands. These brands often lack transparency about their true origins. In the case of Coles, it was accused of suggesting some wines are made in places where they are not...[an ABC] Four Corners episode featured one example of the Two Churches brand that tells a historical story about the Barossa, but the wine is not from a Barossa winery. The address of the maker is actually Coles headquarters in Melbourne!"³⁹
- 5.13. Some of the issues with this activity, in terms of the adverse effect on the proper development of the liquor industry, have been well explained by David Prestipino in his article 'Winestein Uncorked: 'Local' WA wines actually owned by Woolworths, Coles'⁴⁰ 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 Augustine Wines (Woolworths) for sale...wines that are actually owned by the supermarket giants themselves.

³⁹ <https://www.biome.com.au/blogs/eco-home/coles-and-woolworths-misleading-phantom-wine-brands?srltid=AfmBOqTjn2WU47XCyrHJAfi3zYQ-6PTSgp7PBnR6L-JH962x6c5OwY6>

⁴⁰ <https://www.smh.com.au/entertainment/winestein-uncorked-local-wines-actually-owned-by-woolworths-coles-20151211-gllhjo.html>

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."

- 5.14. ALDI's approach is very different because it does not own the wineries, breweries and distilleries that produce the ALDI exclusive products. Therefore, whilst those producers will be required to produce to ALDI's standards and often exclusively for ALDI they will, nonetheless, retain independence and develop the products as the autonomous wine, beer or spirit producing expert. The arms-length independence of ALDI's contracted producers enables those producers to also produce other liquor under different branding to sell directly to consumers separately, or to other packaged liquor retailers.
- 5.15. The ALDI model does not, therefore, have the same deleterious effect on the development of the industry by removing independent liquor producers from the market. Rather, ALDI makes a highly valuable contribution to the industry by providing independent producers with a channel to develop and sell their wares and react to consumer requirements. ALDI properly supports Australia's independent liquor producing industry.
- 5.16. This is one of many factors which differentiates ALDI's liquor range from the major liquor stores.
- 5.17. The South Fremantle community and its neighbours will benefit greatly from having access to this special service. This is particularly so when considered in the context of the location of the ALDI store. The mix of retail products and services at the shopping precinct will be enhanced with increased diversity through the inclusion of ALDI liquor.
- 5.18. 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.
- 5.19. Within the liquor range available in any given week, there will be a selection of new and different liquor items which change from week to week, similar to the "special buys" referred to elsewhere in this PIA. Approximately eight different products per week will be made available to customers until the stocks are depleted and then new ones will be brought in for customers, so the product selection remains fresh and vibrant.
- 5.20. ALDI's liquor range is determined following a rigorous process of elimination trialling and testing of products, then identifying those that offer the very best

5.21. ALDI's liquor advertising is relatively modest, yet smart and stylish. Another example is set out below. 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

A **Cordónes de Nieve**
Cognac (Château Mouton-Rothschild 2015)
\$1199
Cognac has made brandy famous, but this rare vintage from the 18th century is truly unique. It's a blend of white and red grapes, with some aged in oak barrels, giving it a sweet, spicy character.

B **Remy Martin VSOP**
Cognac (Remy Martin 2015)
\$1599
This is a classic French brandy, made from white grapes. It's smooth and elegant, with a hint of vanilla and spice.

C **Maison Laroche Cognac**
Cognac (Maison Laroche 2015)
\$1299
This is a classic French brandy, made from white grapes. It's smooth and elegant, with a hint of vanilla and spice.

D **Black & Tan**
Cognac (Black & Tan 2015)
\$1299
This is a classic French brandy, made from white grapes. It's smooth and elegant, with a hint of vanilla and spice.

E **Hickson House Oyster Shell Gin 700ml**
Award-winning classic gin infused with seaweed, oysters, and other marine flavors. It's perfect for cocktails like the Oyster Shell Martini.

F **Hickson House VSOP**
Brandy (Hickson House 2015)
\$4899
This is a classic French brandy, made from white grapes. It's smooth and elegant, with a hint of vanilla and spice.

G **Hickson House VSOP**
Brandy (Hickson House 2015)
\$4499
This is a classic French brandy, made from white grapes. It's smooth and elegant, with a hint of vanilla and spice.

H **Chivas Regal One**
Whisky (Chivas Regal One 2015)
\$1599
This is a classic Scotch whisky, made from barley malt. It's smooth and elegant, with a hint of vanilla and spice.

I **Southern Comfort**
Liqueur (Southern Comfort 2015)
\$5799
This is a classic Southern liqueur, made from peach and vanilla. It's smooth and elegant, with a hint of vanilla and spice.

J **Galway Pipe**
Whisky (Galway Pipe 2015)
\$3299
This is a classic Irish whisky, made from barley malt. It's smooth and elegant, with a hint of vanilla and spice.

K **Beck's Pilsener Beer**
Beer (Beck's Pilsener Beer 2015)
\$1299
This is a classic German beer, made from barley malt. It's smooth and elegant, with a hint of vanilla and spice.

L **Heineken Lager Beer**
Beer (Heineken Lager Beer 2015)
\$1299
This is a classic Dutch beer, made from barley malt. It's smooth and elegant, with a hint of vanilla and spice.

M **Guinness Extra Stout**
Beer (Guinness Extra Stout 2015)
\$1299
This is a classic Irish stout, made from barley malt. It's smooth and elegant, with a hint of vanilla and spice.

N **Stout**
Beer (Stout 2015)
\$1299
This is a classic Irish stout, made from barley malt. It's smooth and elegant, with a hint of vanilla and spice.

O **Port Wine**
Wine (Port Wine 2015)
\$1299
This is a classic Portuguese wine, made from grapevines. It's smooth and elegant, with a hint of vanilla and spice.

P **Red Wine**
Wine (Red Wine 2015)
\$1299
This is a classic Italian wine, made from grapevines. It's smooth and elegant, with a hint of vanilla and spice.

Q **White Wine**
Wine (White Wine 2015)
\$1299
This is a classic Italian wine, made from grapevines. It's smooth and elegant, with a hint of vanilla and spice.

R **Sparkling Wine**
Wine (Sparkling Wine 2015)
\$1299
This is a classic Italian wine, made from grapevines. It's smooth and elegant, with a hint of vanilla and spice.

S **Vodka**
Spirit (Vodka 2015)
\$1299
This is a classic Russian spirit, made from grain. It's smooth and elegant, with a hint of vanilla and spice.

T **Tequila**
Spirit (Tequila 2015)
\$1299
This is a classic Mexican spirit, made from agave. It's smooth and elegant, with a hint of vanilla and spice.

U **Rum**
Spirit (Rum 2015)
\$1299
This is a classic Caribbean spirit, made from sugarcane. It's smooth and elegant, with a hint of vanilla and spice.

V **Gin**
Spirit (Gin 2015)
\$1299
This is a classic British spirit, made from juniper berries. It's smooth and elegant, with a hint of vanilla and spice.

W **Whisky**
Spirit (Whisky 2015)
\$1299
This is a classic Scottish spirit, made from barley malt. It's smooth and elegant, with a hint of vanilla and spice.

X **Brandy**
Spirit (Brandy 2015)
\$1299
This is a classic French spirit, made from white grapes. It's smooth and elegant, with a hint of vanilla and spice.

Y **Cognac**
Spirit (Cognac 2015)
\$1299
This is a classic French spirit, made from white grapes. It's smooth and elegant, with a hint of vanilla and spice.

Z **Champagne**
Wine (Champagne 2015)
\$1299
This is a classic French sparkling wine, made from grapevines. It's smooth and elegant, with a hint of vanilla and spice.

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

- 23



- 6.3. The free-standing displays depicted in the middle of the small floor area in the images above are manoeuvrable and may be placed in different positions within the small liquor block.
- 6.4. The applicant seeks the same licensing approval, in respect of the same business model and on the same terms as approved on 43 previous occasions under the Act.
- 6.5. The current unlicensed/non-liquor opening times for the ALDI South Fremantle store are 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: 8.00am to 5.00pm

Sunday: 11:00am to 5.00pm

- 6.6. The liquor service is intended to operate within these periods, but subject to trading hours permitted under section 98D the Act. This means that the liquor section will not be open outside of, nor later than, the usual opening times for the rest of the unlicensed store.
- 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, 10am to 10pm on Sunday and 12 noon to 10pm on ANZAC Day (with no liquor trading on Good Friday or Christmas Day). However, the actual opening times of the liquor section are proposed to be no more than the usual ALDI store trading hours, as stated above and so will be less⁴¹.
- 6.8. When the unlicensed ALDI supermarket is not trading, the liquor display/browse area would be clearly closed off to customers and if the ALDI store is open for trade at times not permitted under section 98D 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.
- 6.9. The applicant invites the licensing authority, if it considers appropriate, to impose the following special trading conditions on the proposed ALDI South Fremantle licence that mirror those imposed on most of ALDI's existing licences in WA:
- 6.9.1. The licensee is prohibited from selling refrigerated liquor products.
 - 6.9.2. There is to be no external advertising of liquor products on the façade of the licensed premises.
 - 6.9.3. The browse/display area is to be closed off when not open for trade.
 - 6.9.4. The licensee is to have and maintain a CCTV system in accordance with the policies of the Director of Liquor Licensing.
 - 6.9.5. 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.
 - 6.9.6. The entry/exit point to the licensed area must have a gate.
- 6.10. 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 the South Fremantle store, should the application be approved:
- 6.10.1. ALDI exclusive product range.
 - 6.10.2. Special licence conditions.

⁴¹ Except no liquor trading before 12 noon on ANZAC Day or any time on Good Friday or Christmas Day

- 6.10.3. Combination of the ALDI liquor service with the ALDI non-liquor store elements. A one-stop-ALDI shopping convenience.
 - 6.10.4. One transaction convenience.
 - 6.10.5. Its small size and location under the supermarket roof.
 - 6.10.6. Small, carefully curated selection of liquor with no bulk displays.
 - 6.10.7. Absence of refrigeration.
 - 6.10.8. Absence of external presence of the liquor section.
 - 6.10.9. The particular level of surveillance of the display/browse area which can be seen and monitored by staff at all times in its entirety.
 - 6.10.10. Restricted visibility into the liquor section as a juvenile risk management feature.
 - 6.10.11. Combined beneficial effects of the features listed above which are supplemented by the overall manner of trade and harm minimisation features identified.
- 6.11. In regard to the "target client base" required by the Form 2A to be addressed:
- 6.11.1. Principally, the ALDI target client base for the proposed liquor service will be the enormous number of adult customers of the ALDI South Fremantle supermarket who are demanding liquor be available to them there. 8,237 shoppers per week on average have been recorded at the ALDI South Fremantle store⁴².
 - 6.11.2. The expert market researcher has found that "[s]eventy-six per cent of shoppers who currently buy packaged liquor products once or more a fortnight would shop for their packaged liquor needs at least once a fortnight from the South Fremantle ALDI liquor section, should it be established...[and] 79% of those who buy their packaged liquor needs at least once a month would buy from the proposed ALDI liquor section at least once a month"⁴³. These percentages translate to thousands of shoppers on a regular basis⁴⁴.
 - 6.11.3. The second level of target client base will be other people living in and passing through/nearby to the retail precinct where ALDI South Fremantle is located. As referred to further on in this PIA, those people comprise tens of thousands.
 - 6.11.4. More generally the target client base consists of people living in the local community, up to around 3-6/7km from the store. Currently thousands of shoppers travel to other ALDI stores located elsewhere, outside their area, in order to access ALDI liquor⁴⁵ and the next

⁴² PRG report at page 5

⁴³ PRG report at pages 6

⁴⁴ Based on the PRG methodology, average number of weekly shoppers in store now and the large local resident population referred to elsewhere in this PIA

⁴⁵ PRG report at pages 17 and 18

nearest ALDI liquor service is approximately 6km away (one-way, straight line).

- 6.12. ALDI operates friendly, inclusive and welcoming stores. Any adult may potentially visit the liquor section in South Fremantle and shop there provided only that they comply with ALDI's conditions of entry that apply to anyone and also any legal requirements by which ALDI needs to abide.
- 6.13. 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 have 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 over 110,000 members⁴⁶. ALDI's official Facebook page has nearly 1 million "followers"⁴⁷. This medium is the modern-day voice of the public and therefore, represents significant community sentiment.
- 6.14. The first two ALDI applications for liquor store licences in WA were refused at first instance⁴⁸. Subsequently, a massive 8,637 people took it upon themselves to participate in an Internet survey conducted by Nine News Perth⁴⁹ 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. The public's reaction to the survey is indicative of ALDI's significant popularity in the WA community.
- 6.15. The applicant engaged independent expert market research firm, PRG ⁵⁰, to conduct a market survey and to subsequently provide a report of the results which has been used to formulate this application and 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 300 people interviewed and surveyed, include the following:
- 6.15.1. "Eighty-three per cent of all shoppers, and 85% of take-away liquor buyers support the establishment of a liquor section within the ALDI South Fremantle store."⁵¹
- 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 75% of shoppers had shopped in an ALDI store that included a liquor section, adds some weight to these observations."⁵²

⁴⁶ <https://www.facebook.com/groups/117155111252/>

⁴⁷ <https://www.facebook.com/ALDI.Australia/>

⁴⁸ Decision of Director of Liquor Licensing: ALDI Harrisdale (A000187300) and Decision of Director of Liquor Licensing: ALDI Joondalup (A000191943)

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

⁵⁰ Experience, expertise and methods are referred to on pages 2, 5 and 11-14; Also:

<https://marketresearch.com.au/about-us/overview/>

⁵¹ PRG report at page 7

⁵² PRG report at page 9

6.15.3. "[M]ore than 8 in 10 of all shoppers (82%) like the notion that the liquor section would be located within the ALDI South Fremantle store."⁵³

6.16. The PRG report has been compiled by a highly experienced and qualified 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"⁵⁴.

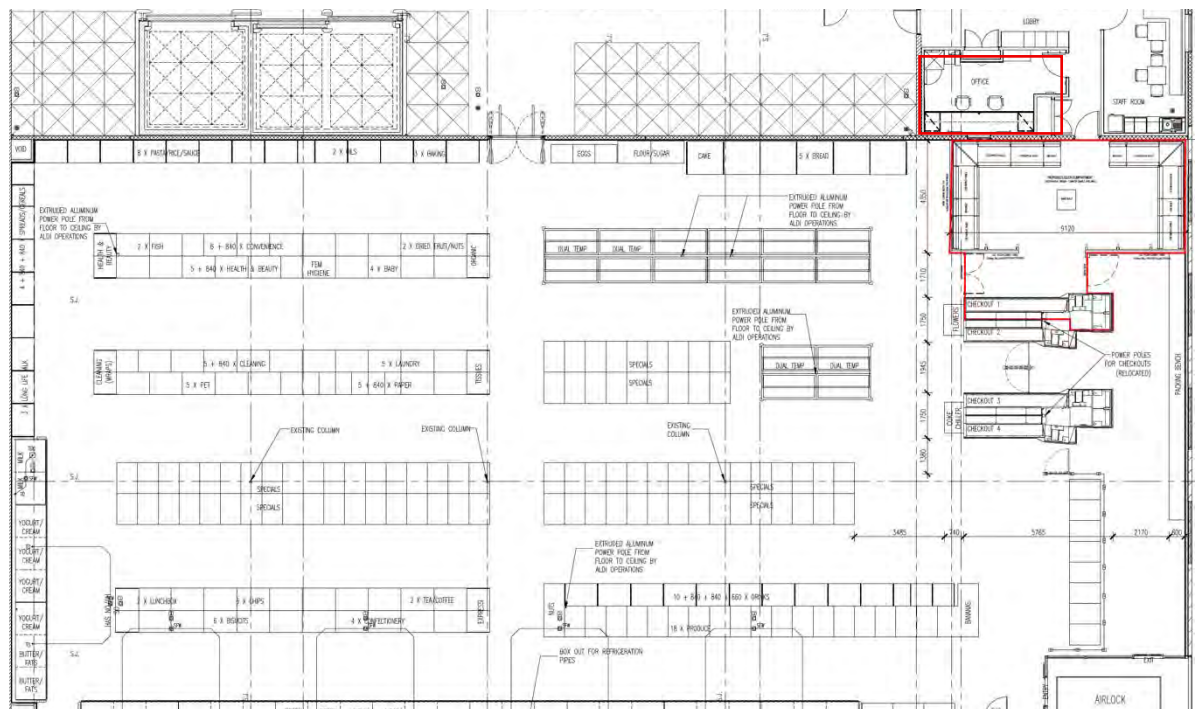
Form 2A "2.2 Describe the premises/proposed premises"

6.17. The following is an extract of the applicant's floor plan lodged with the application, showing the area proposed to be licensed, outlined in red, which includes:

6.17.1. the liquor display/browse and checkout, with a combined area of approximately 38m² and

6.17.2. the in-store office, of approximately 10m², which is also sought to be licensed for the purposes of housing the required licensing documents and to accommodate the approved manager needing to be positioned in there from time to time.

The total proposed licensed area is a tiny proportion of the overall footprint of the whole ALDI South Fremantle store.



6.18. The display/browse space is a simple rectangular shape. This design is based on many years of experience and enables convenience and a high level of

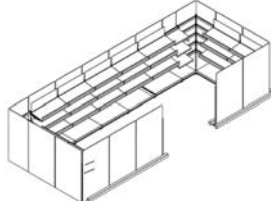
⁵³ PRG report at page 20

⁵⁴ Hearing 22 February 2017, transcript at page 45

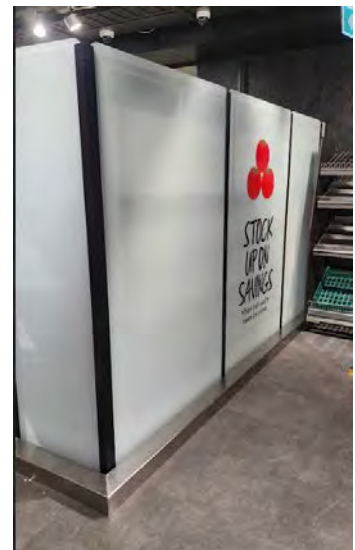
surveillance of the area. The display/browse area will also comfortably accommodate shoppers with their trolleys.

- 6.19. 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.
- 6.20. The very small size and layout of the liquor display/browse area clearly confirms that the liquor section is a complementary service to the rest of the ALDI store and will help ensure the area is well-controlled and supervised.

- 6.21. As set out earlier on in this document, the aerial render depicted to the right of this paragraph is indicative of the proposed sectioned-off liquor display/browse area, which is to be incorporated into ALDI South Fremantle if the licence is approved.



- 6.22. The boundary partitioning, depicted in the photo to the right, is intended to be made of 2.1 metre high opaque frosted glass. This will surround and enclose the proposed liquor display and browsing area. It is designed to enhance separation from the main non-liquor part of the store and to comply with the proposed special licence conditions.



- 6.23. The following photograph of the approved liquor section at the ALDI Yanchep store is indicative of what is proposed to be established at South Fremantle:



- 6.24. 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.
- 6.25. 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.
- 6.26. 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 to the right, at the end of the far-end aisle.
- 6.27. There will be no cool room or other refrigeration in the liquor area. All liquor 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 that facilitates quick drinking.
- 6.28. As stated previously, the office inside the ALDI 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 need to be positioned inside the office and therefore, variation to the usual requirement under section 100 of the Act is sought, consistent with ALDI's existing licence approvals.
- 6.29. Signage external to the licensed premises, as depicted to the right, may be displayed which is subtle, modest and states simply that there is "liquor available in store", but such signage will not contain images of liquor products, references to particular liquor products or prices of liquor products. The example to the right indicates the innocuous type of external signage that may be displayed.



- 6.30. ALDI stores generally, which includes the South Fremantle store, comprise a total footprint of approximately 2,000m². Some are located inside shopping centres, while others, like South Fremantle, are free-standing.
- 6.31. Consistent with other ALDI stores, at South Fremantle the following different parts or areas, listed in order of size in terms of the approximate portion of the total footprint, will make-up the store:
- 6.31.1. Main public retail area (non-liquor) – displaying grocery, other supermarket items, homewares, clothing, furniture, tools and other non-grocery items.
 - 6.31.2. Storage.
 - 6.31.3. Loading dock/delivery area.
 - 6.31.4. Entrance and trolley bay.
 - 6.31.5. Checkout.
 - 6.31.6. Office and staff facilities.
 - 6.31.7. Liquor display and browse area (proposed).
- 6.32. The applicant intends to store liquor in the back-of-house storage area of the ALDI South Fremantle store 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 areas.
- 6.33. 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 South Fremantle store:



- 6.34. 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.



- 6.39. The area on the western side of the wider precinct, which is the Neighbourhood Centre, where ALDI is located, is home to the South Fremantle Market Place which includes the following:
- | | | | |
|---------|----------------------|----------|-----------------|
| 6.39.1. | ALDI South Fremantle | 6.39.8. | Australian Post |
| 6.39.2. | Woolworths | 6.39.9. | Jetts gym |
| 6.39.3. | Fuel station | 6.39.10. | Dan Murphy's |
| 6.39.4. | Auto Masters | 6.39.11. | Liquorland |
| 6.39.5. | Reject Shop | 6.39.12. | Clothing stores |
| 6.39.6. | Salvos | 6.39.13. | Cafe |
| 6.39.7. | Baker's Delight | | |
- 6.40. The corner position of South Fremantle Market Place creates two access points into this western area – from Hampton Road and Douro Road – and a large open-air carpark which offers parking virtually at the front door to the ALDI store.
- 6.41. Just north of the South Fremantle Market Place are additional and mainly grocery and other food-focused businesses, including Peaches and IGA.
- 6.42. Just south of the South Fremantle Market Place is Saltwater Marine which includes boat sale yard.
- 6.43. On the eastern side of the wider precinct, on the opposite side of Hampton Road from the Neighbourhood Centre, are the following, among other businesses:
- | | | | |
|---------|-----------------------------|---------|------------|
| 6.43.1. | Second-hand car dealership | 6.43.6. | Car wash |
| 6.43.2. | Settlement agency | 6.43.7. | Pet Stock |
| 6.43.3. | Ultra Tune | 6.43.8. | Gold's Gym |
| 6.43.4. | Fitstop | 6.43.9. | Subway |
| 6.43.5. | Purslowe & Chipper Funerals | | |
- 6.44. This precinct is a hive of activity, seven days a week. It is a popular and highly-patronised centre. The ALDI store alone, as stated elsewhere in this PIA, attracts an average of 8,237 shoppers per week⁵⁶. Traffic around the site includes the following:
- | | |
|---------|--|
| 6.44.1. | An average of 27,760 vehicles per day on Hampton Road. ⁵⁷ |
| 6.44.2. | An average of 14,270 vehicles per day on Douro Road. ⁵⁸ |

⁵⁶ PRG report at page 5

⁵⁷ Main Roads Western Australia Statewide Traffic Digest 2020/21-2025/26 (copy available if required, upon request) at page 24, recorded 2020/21

⁵⁸ Main Roads Western Australia Statewide Traffic Digest 2020/21-2025/26 (copy available if required, upon request) at page 20, recorded 2020/21

- 6.44.3. Transperth bus routes 512, 520, 530, 531, 532, 548 and 549 stop at South Fremantle Market Place on Hampton Road.⁵⁹
- 6.45. Well-known property agent, CBRE published the following overview when advertising a small tenancy available for lease ⁶⁰.
- South Fremantle Market Place is located approximately 19kms south of Perth CBD, with dual access into the center from Hampton and Douro Roads.
- Just down the road from the iconic South Beach and framed by the bustling Hampton Road, the center is a hub of activity all year long.
- The centre is home to iconic national brands, anchored by the likes of Woolworths, Aldi, The Reject Shop, Dan Murphy's and more.
- A rare opportunity has emerged at this tightly held center, for the lease of 50sqm, with a desirable 7sqm shop frontage, lending to excellent exposure within the centre.
- South Fremantle Market Place is home to a exemplary tenant mix, including the likes of anchor tenants, complimented by local ammenties, such as a pharmacy, medical centre and dentist, making the centre a one stop shop for the Fremantle and wider community.
- The center has a longstanding history within South Fremantle, with little to no historic vacancy. This is a fantastic opportunity to join a high performing and sought after centre.
- 6.46. This highly active area is interposed with residences with single and multi-storey homes of mixed formats including strata lots of townhouses and apartments. It is very much mixed use.
- 6.47. There is easy access directly into ALDI South Fremantle from the ample parking available at the South Fremantle Market Place. The ALDI store is fairly centrally located and customers can park just a few metres from the front door and benefit from a pedestrian cross-walk at the entrance. Trolleys are available near the entrance. These factors are depicted as follows:



⁵⁹ Stop ID 10687 (<https://www.transperth.wa.gov.au/timetables>)

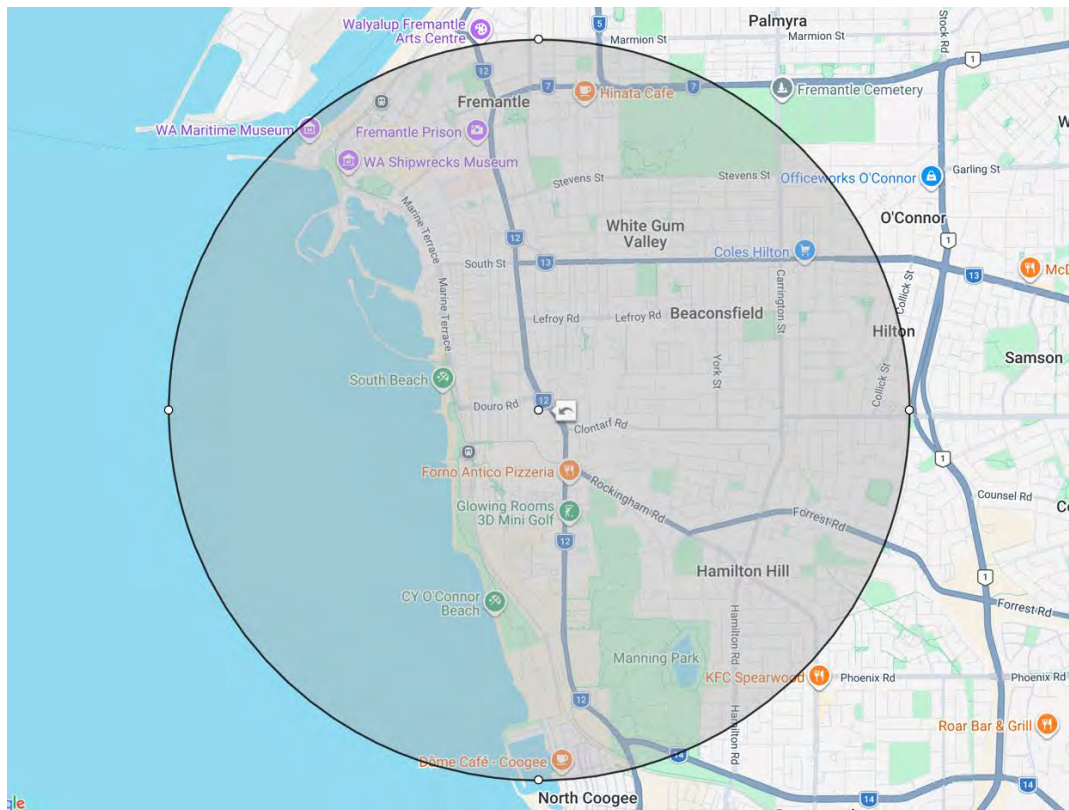
⁶⁰ <https://www.cbre.com.au/properties/retail/details/AU-7161666-1/24-219-hampton-road-24-219-hampton-road-south-fremantle-wa-6162>

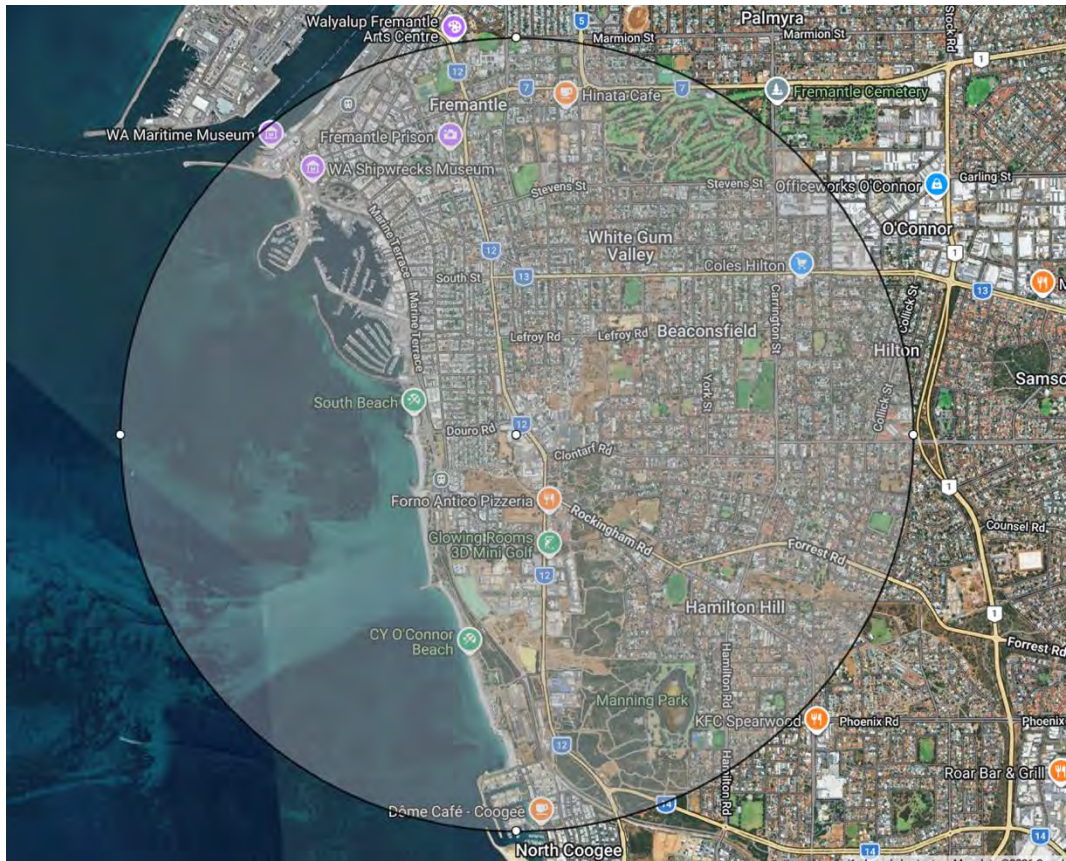




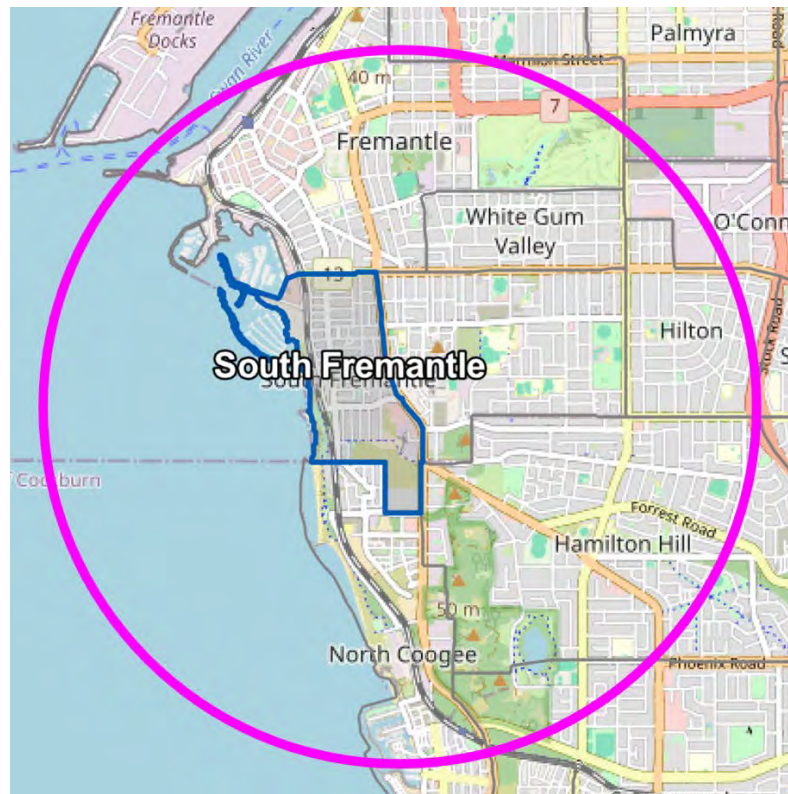
Form 2A: “2.3 If you intend to sell packaged liquor, give the names and addresses of all existing licensed premises within the locality”

- 6.48. To address this Form 2A item, it is necessary to firstly identify the relevant locality.
- 6.49. There is no definition of “locality” in the Act.
- 6.50. The ALDI South Fremantle store is located approximately 17km south-west of the Perth CBD. In the Form 2A, the Department has suggested that the locality for this location may be a 3km radius around the proposed licensed area. That area is depicted in the Google Maps images below (**3km locality**). The white central dot depicts the location of ALDI South Fremantle.





- 6.51. The following Australian Bureau of Statistics' (**ABS**) map shows the suburb of South Fremantle labelled and outlined in **blue** and the surrounding suburbs also labelled and outlined in grey. The thick pink circle is the 3km locality radius.



- 6.52. This area straddles the Cities of Fremantle and Cockburn and touches the south western boundary of the Town of East Fremantle. The 3km locality comprises all or parts of the following suburbs based on ABS data and mapping⁶¹.
- 6.52.1. South Fremantle (whole suburb)
 - 6.52.2. White Gum Valley (whole suburb)
 - 6.52.3. Beaconsfield (whole suburb)
 - 6.52.4. Hilton (approx. 95% of the suburb)
 - 6.52.5. Fremantle (approx. 90% of the suburb)
 - 6.52.6. North Coogee (approx. 70% of the suburb)
 - 6.52.7. Hamilton Hill (approximately 65% of the suburb)
 - 6.52.8. O'Connor (approximately 10% of the suburb)
 - 6.52.9. Palmyra (approximately 1% of the suburb)
 - 6.52.10. East Fremantle (approximately 1% of the suburb)
- 6.53. Data applicable to the suburbs of O'Connor, Palmyra and East Fremantle has mostly been omitted from this PIA because to include such information would likely distort the overall picture of the 3km locality given that those suburbs represent only a tiny pocket of the 3km locality. The other seven suburbs listed above are considered most relevant.
- 6.54. The 3km locality is a very established part of the Perth metropolitan area with considerable history. South Fremantle was settled in 1831⁶². There is an eclectic land use mix, a busy road network, train line, a range of retail and commercial operations, maritime facilities, civic sites, residential, marina, beach and ocean.
- 6.55. Having regard for the Department's direction that a "common-sense approach"⁶³ should be applied to the level of detail in this PIA, a reasonable amount of information has been provided but not extensive details of the land uses and physical characteristics. The Department is invited to request, as contemplated in its Public Interest Assessment information factsheet/policy⁶⁴, further detail on such matters should such material be considered necessary.

⁶¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368> (South Fremantle),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51593> (White Gum Valley),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50086> (Beaconsfield),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50641> (Hilton),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50522> (Fremantle),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51135> (North Coogee),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50609> (Hamilton Hill),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51172> (O'Connor),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51197> (Palmyra) and
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50457> (East Fremantle)

⁶² <https://reiwa.com.au/suburb/south-fremantle/>

⁶³ Form 2A page 2

⁶⁴ <https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

- 6.56. "[T]he word 'locality' in s 36B denotes an area that surrounds, and is geographically close to, the location of the proposed premises"⁶⁵.
- 6.57. "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."⁶⁶
- 6.58. "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'"⁶⁷.
- 6.59. "[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."⁶⁸
- 6.60. "What constitutes a 'locality' relates to the geographical area surrounding, and what is relatively close to, the proposed site"⁶⁹.
- 6.61. "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"⁷⁰.
- 6.62. "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

⁶⁵ *Liquorland (Australia) Pty Ltd v Director of Liquor Licensing* [2021] WASC 366 (**Liquorland Karrinyup**) [181] (Archer J); confirmed in *Liquorland Southern River* [62] (Lemonis)

⁶⁶ *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)

⁶⁷ *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)

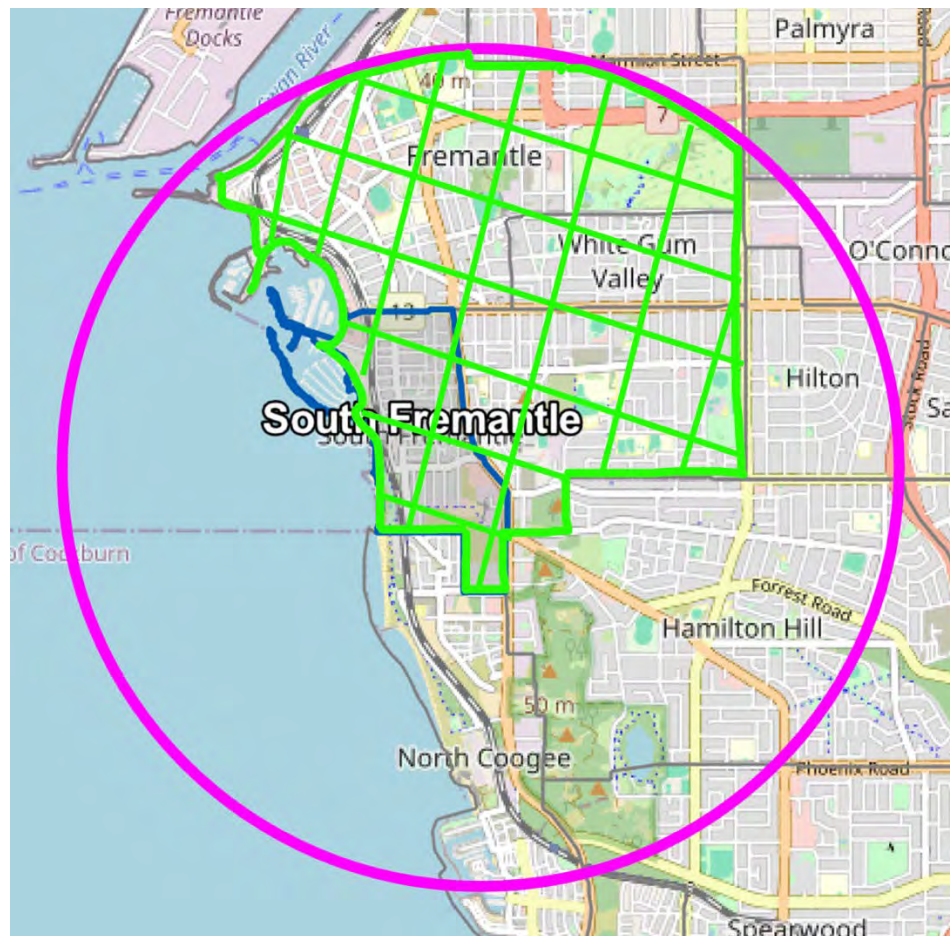
⁶⁸ *Liquorland Karrinyup* [186] (Archer J); confirmed in *Liquorland Southern River* [62] (Lemonis)

⁶⁹ *JB Foods Pty Ltd v Commissioner of Police* [2022] WASC 352 [14] (Smith J); *Liquorland Karrinyup* [186] and [190] (Archer J)

⁷⁰ *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]

objects of the Act and the functions of the licensing authority which require consideration of the actual impacts of a proposed application".⁷¹

- 6.63. Having regard to the findings in Liquorland Karrinyup, upheld in Liquorland Southern River, for the purposes of section 36B of the Act the applicant submits that the relevant locality in this case is the area comprising the suburbs of South Fremantle, Beaconsfield, White Gum Valley and the area of Fremantle that falls within the 3km locality. This area is outlined and cross-hatched in **bright green** in the following image (**s36B locality**), where the 3km locality has again been identified by the bright pink radius. This s36B locality area represents approximately 50% of the 3km locality area.



- 6.64. The proposition that this (bright green cross-hatched) area should be the relevant locality for section 36B of the Act is based on the following:
- 6.64.1. This area is entirely within the City of Fremantle, sitting just above the City of Cockburn northern boundary.
 - 6.64.2. The s36B locality area represents most of the existing catchment at the ALDI South Fremantle store and is the area from where the applicant expects to draw most of its liquor customers.

⁷¹ 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]

- 6.64.3. The suburbs of South Fremantle, Beaconsfield, White Gum Valley are entirely within the s36B locality. They are not disrupted by any other boundary and collectively they neatly comprise most of the northern half of the 3km locality in a logical manner.
- 6.64.4. The 3km locality comprises various physical delineation, most notably busy roads. Hampton Road, which travels north and south through the area, alongside the applicant's site and Rockingham Road nearby which intersects with and runs away from Hampton Road to the east into Hamilton Hill, are significant four-lane dual carriageways transporting huge volumes of traffic through the area. Of the three most recent traffic volume recording stations on Hampton Road, the highest volume for the road, by far, was recorded at the point nearest to Rockingham Road, being an average of 27,760 vehicles on average per day.⁷² The junction of the two roads is located at the south-eastern boundary point of the s36B locality and where Hampton Road becomes Cockburn Road and the City of Cockburn commences. That junction has delineating effects. The intersection is controlled with traffic lights. It is partly pictured below.



⁷² Main Roads Western Australia Statewide Traffic Digest 2020/21-2025/26 (copy available if required, upon request) at page 24, recorded 2020/21

- 6.64.5. The ALDI liquor service in South Fremantle is intended to be primarily a neighbourhood store, providing a modern local convenience, for customers who will mostly live within the s36B locality.
- 6.64.6. The s36B locality focuses on the designated Neighbourhood Centre for South Fremantle. The south eastern end of the 3km locality is situated away from this Neighbourhood Centre and is closer to other major shopping centres and retail precincts within the City of Cockburn, whereas the northern side, comprising the s36B locality, has limited retail resources and relies on the designated Neighbourhood Centre for South Fremantle where the ALDI South Fremantle store is located.
- 6.64.7. 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 area covered by the s36B locality. This proposition is supported by the obiter dictum of Lemonis J in *Liquorland Southern River* at [65].
- 6.65. The following Google Maps images and additional photographs show aspects of the area immediately surrounding the Neighbourhood Centre and commercial precinct where ALDI South Fremantle is already operating.





- 6.66. The applicant has carefully considered both the 3km locality and s36B locality, as referred to throughout this PIA and the accompanying Legal Submissions.
- 6.67. Having regard for sections 16(7)(b) and (c) of the Act, the Department's "common-sense approach" policy⁷³ and the State Government's published desire to make it less complicated and easier to do business in the WA liquor industry⁷⁴, the assessments of the 3km locality and s36B locality in this PIA are not exhaustive. The applicant has provided a level of detail considered appropriate for the circumstances. Further detail, additional copies of source material and supplementary supporting submissions and evidence can be provided if necessary.
- 6.68. As required by the Form 2A, the applicant has identified the "names and addresses of all existing licensed premises within the [s36B] locality". The information is contained in the attached list based upon details as appear in the Department's published licence database. The "packaged liquor premises"⁷⁵ have been highlighted in that list, in yellow and are also referred to again further on in this PIA.
- 6.69. Other licensed premises exist beyond the s36B locality, elsewhere within the 3km locality. They have been identified and are named in a separate additional list attached to this PIA, also based on the Department's published licence database. The "packaged liquor premises"⁷⁶ in that list have also been highlighted in yellow and are also referred to again further on in this PIA.

⁷³ Form 2A page 2 and at <https://www.dlgsc.wa.gov.au/departments/publications/publication/public-interest-assessment>

⁷⁴ For example: <https://www.cits.wa.gov.au/departments/news/news-article/2024/08/29/liquor-licensing-policy-reform-a-big-win-for-wa-hospitality-industry>

⁷⁵ As defined in section 36B of the Act

⁷⁶ As defined in section 36B of the Act

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. At the most recent, 2021 Census the ABS recorded⁷⁷ the following numbers of people living in the suburbs comprising the majority of the 3km locality and s36B locality, relative to the estimated portions of developed residential area of those suburbs that fall within the 3km locality and s36B locality:

	Total suburb population	Portion estimated to be living within the 3km locality	Portion estimated to be living within the s36B locality
South Fremantle	3,398	100%: 3,398	100%: 3,398
White Gum Valley	3,358	100%: 3,358	100%: 3,358
Beaconsfield	5,315	100%: 5,315	100%: 5,315
Hilton	4,323	95%: 4,107	0
Fremantle	9,251	90%: 8,326	90%: 8,326
North Coogee	3,741	70%: 2,619	0
Hamilton Hill	11,327	65%: 7,363	0
Collective total number of people estimated to be living within the 3km locality as at the 2021 Census		34,486	N/A
Collective total number of people estimated to be living within the s36B locality as at the 2021 Census		N/A	20,397

- 7.2. The applicant has had regard for the “population characteristics of the locality” as required by the Form 2A and identified the following from 2021 ABS Census data⁷⁸. Statistics for the whole state of WA have been included for contextual and comparative purposes.

⁷⁷ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368> (South Fremantle), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51593> (White Gum Valley), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50086> (Beaconsfield), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50641> (Hilton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50522> (Fremantle), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51135> (North Coogee), and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50609> (Hamilton Hill)

⁷⁸ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368> (South Fremantle), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51593> (White Gum Valley), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50086> (Beaconsfield), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50641> (Hilton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50522> (Fremantle),

	South Fremantle	White Gum Valley	Beaconsfield	Hilton
Male	49.3%	47.7%	48.6%	47.3%
Female	50.7%	52.3%	51.4%	52.7%
Median age	48	41	42	38
Aged 19 and under	16%	22.6%	22.7%	24.2%
Aged 65 and over	23.6%	16.3%	19.4%	17%
Aboriginal and/or Torres Strait Islander	1.4%	1.5%	2.1%	3%
Born in Australia	60.9%	66.6%	67.4%	66.4%
English only used at home	84.6%	78.8%	79.4%	79%
In the labour force	62.1%	67.4%	64.2%	62%
Worked full-time	52.8%	51.8%	51.6%	51.1%
Unemployed	5.1%	5.2%	4.4%	4.9%
Median personal weekly income	\$963	\$930	\$885	\$842
Median weekly family income	\$2,598	\$2,630	\$2,488	\$2,283
No long-term health condition	58.1%	60.6%	60.5%	57.9%
Ancestry	English	English	English	English

Cont...

	Fremantle	Hamilton Hill	North Coogee	WA
Male	49.4%	48.6%	49%	49.7%
Female	50.6%	51.4%	51%	49.5%
Median age	41	39	46	38
Aged 19 and under	14.7%	19.8%	16.7%	23.9%
Aged 65 and over	18.4%	18.3%	18.5%	16.1%
Aboriginal and/or TSI	1.7%	2.9%	0.9%	3.3%
Born in Australia	61.8%	60.7%	61%	62%
English only at home	79.9%	71.6%	81.1%	75.3%
In the labour force	64.5%	61.4%	67.4%	63.9%
Worked full-time	55.4%	54.2%	62.8%	57.1%
Unemployed	5.2%	6.4%	3.3%	5.1%
Median personal week income	\$1,021	\$765	\$1,238	\$848
Median week family income	\$2,713	\$1,864	\$3,265	\$2,214
No long-term health condition	56.8%	57.8%	61.3%	61.2%
Ancestry	English	English	English	English

7.3. The average person living in South Fremantle has been identified as being the following, based on the 2021 ABS Census data⁷⁹:

- 7.3.1. a 48 year old female,
- 7.3.2. married or in a de facto relationship,
- 7.3.3. self-identifying as “non-indigenous”⁸⁰,
- 7.3.4. educated and qualified to a level beyond Year 12,
- 7.3.5. born in Australia, of English ancestry,
- 7.3.6. of no religious affiliation,
- 7.3.7. living in a household as a couple without children,
- 7.3.8. working full-time in an occupation categorised as “professionals”, earning \$963 personally per week on average (- compared to the WA average of \$848 and Australian average of \$805) and
- 7.3.9. not suffering a long-term health condition.

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51135> (North Coogee), and
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50609> (Hamilton Hill)

⁷⁹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368>

⁸⁰ Based on the ABS terminology/definition

- 7.4. The following additional information provides further details of and insight into the “population characteristics of the locality”⁸¹ in terms of ABS statistical averages for people living within the 3km locality⁸²:
- 7.4.1. The top response as to “country of birth” by people born outside Australia, was England.
 - 7.4.2. The top response as to “ancestry” of a non-[predominantly]English speaking country was Italy and so logically the top response for a language used at home other than English was Italian.
 - 7.4.3. Over 40% of people worked 40+ hours per week.
 - 7.4.4. Approximately 66% of people own their own home either outright or with a mortgage.
 - 7.4.5. Of the people who indicated that they have a religious affiliation, the most common response by far was “catholic”.
 - 7.4.6. The most common category of occupation by far was “professionals”.
- 7.5. Socio-Economic Indexes for Areas, which measure the relative level of socio-economic disadvantage and/or advantage, based on a range of ABS data focusing on income and work, have ranked the Cities of Fremantle and Cockburn at numbers 14 and 24 (respectively) out of 140⁸³, which places them both well within the top quarter of the State. These high rankings indicate that residents in the 3km locality enjoy a relatively advantageous and positive level of socio-economic conditions with much higher than average affluence.
- 7.6. Attached are snapshots obtained from the Real Estate Institute of WA⁸⁴ for the seven most relevant suburbs comprising the 3km locality, indicating additional characteristics of the local area applicable to the local community. That information provides further insight into the relative affluence, socio-economic advantage and other positive factors. The average house price for the 3km locality is \$1,491,428, which is significantly more than the average for Greater Perth of \$921,000⁸⁵. The information does not reveal any sensitive or high risk circumstances.

⁸¹ Form 2A

⁸² Based on the combined average of ABS census data for the relevant suburbs comprising the 3km locality:

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368> (South Fremantle),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51593> (White Gum Valley),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50086> (Beaconsfield),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50641> (Hilton),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50522> (Fremantle),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51135> (North Coogee), and

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50609> (Hamilton Hill)

⁸³ <https://profile.id.com.au/wapl/seifa-disadvantage?SeifaKey=40002>

⁸⁴ <https://reiwa.com.au/suburb/south-fremantle/>, <https://reiwa.com.au/suburb/white-gum-valley/>,

<https://reiwa.com.au/suburb/beaconsfield/>, <https://reiwa.com.au/suburb/fremantle/>,

<https://reiwa.com.au/suburb/hilton/>, <https://reiwa.com.au/suburb/north-coogee/> and

<https://reiwa.com.au/suburb/hamilton-hill/>

⁸⁵ <https://reiwa.com.au/the-wa-market/perth-metro/> (for the 12 month period ending May 2026)

7.7. South Fremantle has been described in the following terms⁸⁶.

Uber cool small bars, stunning restaurants, epic bakeries, and some of the best alfresco coffee going. Embrace the slow life in this much-loved local hideaway just a short walk from vibey South Beach. THIS IS SOUTH FREMANTLE.

Visit South Fremantle for:

- South Beach
- Independent boutiques, furniture, and homewares
- Diverse dining (seafood, bratwurst, burgers, Mexican, Italian, Indian...)
- Neighbourhood pubs

Getting here:

- 5–10-minute bus from Fremantle Bus & Train Station. Take the 531 from the station or hop on anywhere along South Terrace. Deviates at Douro Road.
- Nearest car park: South Beach Recreation Reserve, Marine Terrace, and South Fremantle Shopping Centre

INSIDER TIP: Ditch the clock-watching and stay for the day. Swim, coffee, swim, breakfast, shop, lunch, spritz, swim again, and bar hop your way to dinner at Madalena's, the WA Good Food Guide's 2024 Restaurant of the Year.

7.8. The City of Fremantle encompasses the suburbs of Fremantle, South Fremantle, North Fremantle, Beaconsfield, Hilton, O'Connor, Samson and White Gum Valley, covering an area of approximately 19.3km². It has a population of approximately 36,349 people and approximately 5,116 businesses.⁸⁷

7.9. The local council's vision for the City of Fremantle (copied below and to the right of the following sub-paragraphs⁸⁸) provides further insight into the nature of the community. The proposal to introduce a liquor service at the ALDI South Fremantle store fits neatly with this vision in that it will do the following:

⁸⁶ <https://www.visitfremantle.com.au/neighbourhoods/south-fremantle>

⁸⁷ City of Fremantle 2024-25 Annual Report at page 7 (copy available if required, upon request)

⁸⁸ City of Fremantle 2024-25 Annual Report at page 17 (copy available if required, upon request)

- 7.9.1. Enhance shopping convenience to improve walkability and liveability within South Fremantle, and particularly the Neighbourhood Centre.
- 7.9.2. Add vibrancy and diversity to ALDI South Fremantle and consequently, the Neighbourhood Centre.
- 7.9.3. Modernise retailing at the site with a service that is very popular at other locations elsewhere in WA, eastern states and overseas and which is a common contemporary shopping convenience.
- 7.9.4. Provide retail equality for the local community.



7.10. A significant characteristic of the 3km locality and s36B locality is tourism. Enormous numbers of tourists visit the Fremantle – nearly a million day trippers each year⁸⁹. At the end of 2025, Fremantle was named Australia's Top Tourism Town for 2025.⁹⁰ The following provides a snapshot comparison of the City of Fremantle with the whole State for the last five years⁹¹. Additional information regarding the substantial tourism component of the 3km locality in this case is referred to further on in this PIA.

Visitor nights - Numbers

export

City of Fremantle - 2010/11 to 2024/25				City of Fremantle			Western Australia		
Year	International Visitor Nights	Domestic Visitor Nights	Domestic Daytrips	International Visitor Nights	Domestic Visitor Nights	Domestic Daytrips	International Visitor Nights	Domestic Visitor Nights	Domestic Daytrips
2024/25	837,537	—	—	35,806,540	—	—	—	—	—
2023/24	1,003,040	1,295,652	879,825	31,081,383	47,581,167	21,235,926	—	—	—
2022/23	—	1,082,864	753,842	—	49,575,441	21,969,352	—	—	—
2021/22	—	666,589	611,992	—	44,326,621	19,189,670	—	—	—
2020/21	—	792,655	737,484	—	44,697,774	18,693,153	—	—	—

⁸⁹ <https://www.fremantle.wa.gov.au/your-city-and-council/news-and-media/fremantle-crowned-australias-top-tourism-town/>

⁹⁰ <https://www.fremantle.wa.gov.au/your-city-and-council/news-and-media/fremantle-crowned-australias-top-tourism-town/>

⁹¹ <https://economy.id.com.au/fremantle/tourism-visitor-summary>

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

- 7.11. As required by the Form 2A, the applicant has researched and identified names and addresses for the following operating in the 3km locality⁹² and provided those details within the attached list.
- 7.11.1. Schools and educational institutions.
 - 7.11.2. Hospitals.
 - 7.11.3. Hospices.
 - 7.11.4. Aged care facilities.
 - 7.11.5. Churches/places of worship.
 - 7.11.6. Drug and alcohol treatment centres.
 - 7.11.7. Short term accommodation or refuge.
 - 7.11.8. Childcare centres.
 - 7.11.9. Local government.
- 7.12. The applicant has also estimated their approximate distance from ALDI South Fremantle. 54 relevant places in total have been identified.
- 7.13. In addition to the geographical and driving distance that all of the places listed above are from the ALDI South Fremantle store, the liquor section will be even further away from them in terms of accessible distance and not in any way visible to, nor directly accessible, from anywhere outside of the store proper.
- 7.14. The applicant has also identified residences nearby and The Meeting Place Community Centre at 245 South Terrace, South Fremantle, located approximately 850m away from ALDI South Fremantle.

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 intimately familiar 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 existing licensed stores, including the following key elements:
- 8.1.1. Maintaining a very small square metre footprint of licensed space.
 - 8.1.2. Confining the liquor area to well within the store proper so it has no external presence.
 - 8.1.3. Only subtly and modestly promoting the liquor service, including limiting liquor advertising and signage.

⁹² Based on publicly available published information

- 8.1.4. Limiting the stock range to a small, carefully curated selection which has been quality tested to very high standards and includes many award-winning items.
- 8.1.5. Limiting the trading hours.
- 8.2. This liquor store model has been comprehensively tried and tested, resulting in an excellent compliance record.
- 8.3. The applicant has had regard for harm and ill-health factors potentially associated with the new licence, with reference to its trading history. The applicant has a stellar record in terms of compliance and is not aware of any of its licences directly causing harm or ill-health.
- 8.4. Any potential negative impact from the new 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 Harrisdale⁹³ which involved virtually the same proposal.
- "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."
- 8.5. No part of the proposed licensed area will be visible in any way from the churches, schools, aged care facilities and day care centres etc within the 3km locality which have been identified in this PIA. The liquor section itself will be totally concealed from the outside and only visible from well within the ALDI supermarket. It will also be considerably separated and buffered from churches etc by distance and the infrastructure of the South Fremantle Market Place and Neighbourhood Centre.
- 8.6. The applicant has sought to identify current data regarding alcohol related hospitalisations and deaths associated with the 3km locality, but none could be identified from published material as available for public use. 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."⁹⁴
- 8.7. Nonetheless, the applicant acknowledges that hospitalisation and death can potentially result for some people as a consequence of the use of liquor and would most likely be occurring at some level in the 3km locality. Among other things, the applicant has considered the following information in the Perth South PHN Needs Assessment 2022-2024, prepared by the WA Primary Health Alliance and which expressly covers the City of Fremantle⁹⁵:

⁹³ ALDI Harrisdale [38(b)]

⁹⁴ 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

⁹⁵ Copy available if required, upon request; at pages 26 and 27

- 8.7.1. 25% of the southern Perth region referred to within the report were considered to be drinking at a rate that could cause long-term harm.
- 8.7.2. Although, that figure is lower than the WA state rate.
- 8.7.3. Residents of the City of Fremantle were considered to be at greater risk that some of the other local government areas referred to in the report. However, this should be considered in the proper context of relevant locality factors which include the following:
 - 8.7.3.1. Fremantle is a huge tourist attraction, drawing nearly a million day trippers on average each year⁹⁶.
 - 8.7.3.2. As referred to elsewhere in this PIA, Fremantle is home to the highest concentration of licensed premises outside of Perth/Northbridge and so naturally attracts a larger number of people drinking.
- 8.7.4. Encouragingly, the report says that there is an increasing and notable declining trend in alcohol consumption of younger people.
- 8.8. The Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015–2025⁹⁷ is also acknowledged. The applicant's liquor store model is considered to be respectful of this Plan and the positive health outcomes that the Plan tries to achieve by virtue of the various low risk elements built into the ALDI model referred to throughout this document. The very small, discrete and modest scale of the ALDI South Fremantle liquor proposal is expected to contribute to "efforts to change the drinking culture from one of harmful use to one where low-risk drinking is encouraged and supported", as referred to at page 33 of the Plan. This proposition is based on, for example, ALDI's model being capable of encouraging shoppers to do the following:
 - 8.8.1. appreciate the quality and award-winning nature of its products,
 - 8.8.2. purchase in relatively small volumes and without being under the influence of large displays of bulk-sized packaged liquor,
 - 8.8.3. purchase only warm items as opposed to cold items which might be appealing to consume very soon after leaving the store and
 - 8.8.4. purchase in conjunction with food for consumption ancillary to food.
- 8.9. A clear majority of residents in the 3km locality, being approximately 59%⁹⁸, reported at the 2021 Census that they have no long-term health condition. It is

⁹⁶ <https://www.fremantle.wa.gov.au/your-city-and-council/news-and-media/fremantle-crowned-australias-top-tourism-town/>

⁹⁷ Copy available if required, upon request

⁹⁸ Based on the combined average for the seven most relevant suburbs comprising the 3km locality:
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368> (South Fremantle),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51593> (White Gum Valley),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50086> (Beaconsfield),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50641> (Hilton),
<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50522> (Fremantle),

acknowledged that some people did indicate that they experience a long-term health condition.

- 8.10. It has been noted, albeit from a study done elsewhere in Australia, that “RTDs have been the subject of considerable concern by advocacy groups in relation to their contribution to the problems associated with alcohol-related harm among young people”⁹⁹. ALDI’s liquor range includes only a tiny number of RTDs which are not displayed or promoted more substantially than other products. 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.
- 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. Recognising the critical role of staff is another key strategy to ensuring policies and practices are implemented and laws are complied with. 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.
- 8.13. 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:
- 8.13.1. “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 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.”¹⁰⁰
- 8.13.2. “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.”¹⁰¹

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51135> (North Coogee), and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50609> (Hamilton Hill)

⁹⁹ “RTDs in Australia: Expensive designer drinks or cheap rocket fuel?”, by Sandra C Jones and Lance Barrie, Drug and Alcohol Review, January 2011 (copy available if required, upon request)

¹⁰⁰ <https://www.aldicareers.com.au/>

¹⁰¹ <https://aldiaustralia-1481176-en-au.sr-atlrx.com/benefits-that-matter>

- 8.13.3. "We offer diverse and cross-functional career pathways. We also value internal promotions with over 70% of our leaders promoted internally."¹⁰²
- 8.13.4. ALDI Australia has won the Australian Business Award's – Employer of Choice award for several consecutive years.¹⁰³
- 8.13.5. 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.

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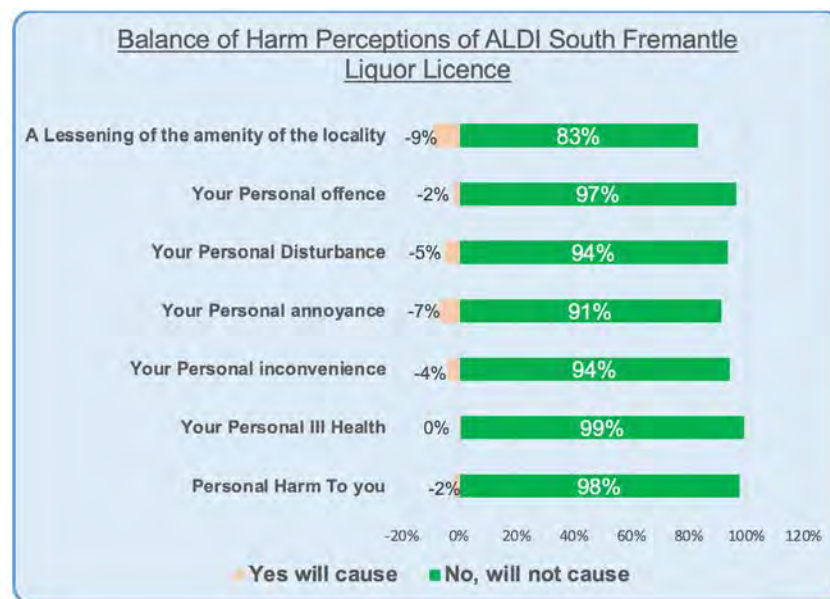
- 8.13.6. Every ALDI staff member is required to undertake detailed internal training and an induction programme. This involves education on a wide variety of facets of the business and includes liquor product knowledge and responsible service. To help ensure high standards are achieved at all times, all ALDI staff are employed on a permanent basis.
- 8.13.7. The applicant will ensure all staff at the ALDI South Fremantle store are properly trained as to their responsibilities under the Act, the Department's policies, ALDI policies and procedures – which include ALDI's particular high standards, matters of safety and all other laws, regulations and standards applicable to the proper conduct of the business.
- 8.13.8. 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.
- 8.13.9. 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. PRG has reported the following from the consumer survey research in terms of public perceptions about potentially adverse consequences from the new

¹⁰² <https://aldi-australia-1481176-en-au.sr-atlrx.com/benefits-that-matter>

¹⁰³ <https://www.aldicareers.com.au/> and <https://www.aldiunpacked.com.au/aldi-australia-is-recognised-as-an-employer-of-choice/>

¹⁰⁴ <https://insidefmca.com.au/2018/10/19/aldi-awarded-ara-employer-of-the-year/>

licence application¹⁰⁵. Clearly there is almost no concern within the shopper community.



8.15. This evidence should be considered directly relevant and particularly probative given its context which is that participants are local people with local knowledge, are familiar with the existing ALDI South Fremantle store and its locality the respondents are already very familiar with the ALDI liquor model¹⁰⁶.

8.16. 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:

- 8.16.1. "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."¹⁰⁷
- 8.16.2. "Seventy-eight percent of consumers are prioritising value for money when shopping..."¹⁰⁸
- 8.16.3. "More than 8 in ten (84%) of the total ALDI shopper sample liked this aspect of the proposed ALDI South Fremantle liquor section...The

¹⁰⁵ PRG report at page 8

¹⁰⁶ Refer for this latter aspect at PRG report pages 17 and 18

¹⁰⁷ <https://www.macrobusiness.com.au/2021/03/the-rise-and-rise-of-aldi/>

¹⁰⁸ <https://ecommercenews.com.au/story/australians-prioritise-value-for-money-as-economic-pressure-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/>

"Net like" proportion is elevated for the "ever buy" subset (91%) and the "have consumed" subset (99%)." ¹⁰⁹

- 8.17. The ALDI liquor model clearly presents with a number of low risk elements, which have been proven to be successful in other locations. This proposition is based on ALDI's excellent trading compliance record and the fact that the large majority of respondents to the PRG survey, comprising 75% who have previously shopped in another ALDI store with a liquor section¹¹⁰, do not consider negative consequences will be likely to result from the grant¹¹¹.
- 8.18. 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 wish. The layout of the supermarket and checkouts enables any shopper to walk their way through the supermarket with barely noticing the liquor component, if at all and not needing to cross through it or near it.
- 8.19. To summarise and reiterate, the following are the key harm and risk minimising features of the ALDI South Fremantle liquor proposal:
- 8.19.1. Its small size
 - 8.19.2. The bright, open-plan layout
 - 8.19.3. The absence of refrigeration to help avoid impulse buying and impulse drinking. The absence of a walk-in coolroom also enhances surveillance.
 - 8.19.4. The limited stock range and volume.
 - 8.19.5. The absence of an online delivery service
 - 8.19.6. The absence of bulk quantities of cheap mainstream products.
 - 8.19.7. Reduced trading hours – significantly less than permitted under the Act and less than the usual trading hours of most other liquor stores.
 - 8.19.8. 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.
 - 8.19.9. The restricted visibility of and into the liquor section.
 - 8.19.10. 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.

¹⁰⁹ PRG report at page 23

¹¹⁰ PRG report at page 17

¹¹¹ PRG report at page 8 and see also page 30

- 8.19.11. The limited and controlled nature of product pricing.
- 8.19.12. The lack of signage external to the store advertising discounted liquor products.
- 8.19.13. The highly experienced and reputable operator.
- 8.19.14. The high level of staff training.
- 8.20. Importantly also, there will be none of the following:
 - 8.20.1. Prominent external advertising of liquor products and their prices.
 - 8.20.2. Products, advertising or promotional materials designed to entice juveniles.
 - 8.20.3. Large volumes of cheap bulk products displayed.
 - 8.20.4. Volumes of liquor products refrigerated and ready-to-drink.
 - 8.20.5. Energy drinks stocked in the liquor display/browsing area.
- 8.21. 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.
 - 8.21.1. The store layout will enable juveniles to totally avoid going near the liquor section.
 - 8.21.2. 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.
 - 8.21.3. No liquor will be sold or supplied to juveniles or anyone who is suspected of trying to obtain liquor for a juvenile.
 - 8.21.4. ALDI has adopted an "ID Under 25" policy. Staff at ALDI South Fremantle 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.
 - 8.21.5. 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.
 - 8.21.6. If a juvenile is observed to be loitering near the liquor block they 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.

- 8.21.7. Lollies and other items commonly known to attract the attention of juveniles will not be stocked in the liquor display/browse area.
- 8.21.8. The liquor display and browse area will have limited line-of-sight such that visibility into that area will be restricted.
- 8.21.9. The liquor area will be subject to a high level of surveillance and security from the associated checkout.
- 8.21.10. Unaccompanied juveniles who may be in the supermarket from time to time will be directed to a non-licensed checkout to make their purchase.
- 8.22. A clear example of ALDI's high standards as regards liquor and juveniles is when the company came under scrutiny from the public for the strictness of its approach. Some ALDI stores in New South Wales have refused service to adults because staff have witnessed a juvenile merely touching the liquor items, even where they have touched the items simply to stop them from falling over in a trolley.¹¹²
- 8.23. 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 section¹¹³.



¹¹² <https://www.news.com.au/finance/business/retail/aldis-strict-underage-alcohol-policing-leaves-shoppers-high-and-dry/news-story/c7bea2c4b8e1f0345b3545c98c7789c>

¹¹³ Faces redacted for privacy reasons

- 8.24. 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 licence operating at the South Fremantle store.
- 8.25. 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 South Fremantle is successful in all respects, including genuinely minimising harm and successfully managing risks.
- 8.26. The applicant has identified the issue of crime in terms of harm factors applicable to the 3km locality. Attached to this PIA is information regarding Police offence data that has been identified and considered. This data, whilst not that of proven crimes, may possibly assist in assessing very broadly and generally criminal offence activity in the area. The following observations and submissions are made in respect of the data.
- 8.26.1. It is acknowledged that crime occurs in the 3km locality and this can be regarded as a negative factor.
- 8.26.2. It is further acknowledged that some offence rates within the 3km locality are relatively higher compared to other areas in WA, particularly the suburb of Fremantle and for some of the records there has been an upward trend recently.
- 8.26.3. These factors should not, however, inhibit the grant of the licence.
- 8.26.4. The 3km locality comprises an enormous population of around 34,486¹¹⁴ and attracts massive volumes of visitors - nearly a million day trippers on each year¹¹⁵. In this regard, the offence rate may reasonably be regarded as relative and to be expected.
- 8.26.5. The most common offence across the 3km locality is, by far, "theft". ALDI will have multiple measures in place to reduce the risk of theft and also property damage to its stock and store, as referred to further on in this PIA.
- 8.26.6. The offence records of violent crimes are, for most of the suburbs comprising the 3km locality, including South Fremantle, lower than the State average.

¹¹⁴ As explained earlier in this PIA (<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368> (South Fremantle), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51593> (White Gum Valley), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50086> (Beaconsfield), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50641> (Hilton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50522> (Fremantle), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51135> (North Coogee), and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50609> (Hamilton Hill))

¹¹⁵ <https://www.fremantle.wa.gov.au/your-city-and-council/news-and-media/fremantle-crowned-australias-top-tourism-town/>

- 8.26.7. To consider the information in some context, the 3km locality has much lower offence rates per 1,000 people than, for example, Perth¹¹⁶.
- 8.26.8. The suburb within the 3km locality that has the highest “crime rank” is, by far, Fremantle, not South Fremantle. The location for the proposed new licence has recorded substantially less offences than Fremantle.
- 8.26.9. Whilst crime generally may be regarded as a negative factor in the determination of a licence application, it should not be considered in isolation. As referred to earlier on in this PIA, there are many very positive locality factors in this case, including the high levels of socio-economic advantage.
- 8.27. The Police data does not reveal anything to suggest that the 3km locality experiences a concerning or unusual level of crime relative to its circumstances and relevant to the ALDI proposal and the true nature of the area.
- 8.28. The existing ALDI South Fremantle store is not known to be the subject of an unusual level of crime.
- 8.29. The applicant will nevertheless 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. 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 building.
- 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.
- 8.29.6. Lack of a walk-in cool room, which is ordinarily hidden from staff view, 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,

¹¹⁶ <https://redsuburbs.com.au/suburbs/perth-wa/>

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 South Fremantle 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 devised a Security Layout plan, illustrating the general position and fit-out of security measures. If required and requested, a copy can be provided to the licensing authority on a strictly confidential basis. An advanced security and surveillance system will be installed, based on the model which has been successfully operating at existing stores. 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. These features of the proposed South Fremantle liquor section will make it extremely difficult for

juveniles, drunk people or would-be thieves to gain access to the liquor area and go undetected, 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 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 and small layout aspects of the liquor area will help to 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.

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 nature of the relevant amenity in this case has been variously described and depicted throughout this PIA and some of the attachments. It is a very established, developed, relatively modern and extremely busy built-up mixed-use area.
- 9.2. The Neighbourhood Centre classification of the local area means that it is intended to serve as a key focal point for the local community and the community's walkability¹¹⁷.
- 9.3. “Neighbourhood centres are important local focal points that provide for daily to weekly household shopping needs, community facilities and a small range of other convenience services. They are also a focus for medium density housing. These centres play an important role in providing walkable access to services and facilities for local communities”.¹¹⁸
- 9.4. The City of Fremantle's published “planning direction” for the South Fremantle Neighbourhood Centre is to “[f]acilitate [it] as a vibrant neighbourhood centre that encompasses weekly and convenience retailing and other amenities to service the diverse needs of the local community”¹¹⁹...The South Fremantle shopping centre precinct is also earmarked (with owners' consent) for precinct planning to better utilise and grow a mix of uses in this area”¹²⁰. Approval of the liquor store licence for the ALDI store will be entirely consistent with and supportive of these goals.

¹¹⁷ City of Fremantle Local Planning Strategy, 5 February 2026 (copy available if required, upon request), at page 69

¹¹⁸ WA Planning Commission State Planning Policy 4.2 Activity Centres, July 2023 (copy available if required, upon request), at page 19

¹¹⁹ City of Fremantle Local Planning Strategy, 5 February 2026 (copy available if required, upon request), at page 71

¹²⁰ City of Fremantle Local Planning Strategy, 5 February 2026 (copy available if required, upon request), at page 78

- 9.5. The coastline and associated infrastructure dominate the 3km locality, accompanied by other significant features including historical buildings, entertainment precinct. There is a large number of cultural facilities including theatres, heritage-listed places, galleries and museums. These factors are presumably within the common knowledge of the licensing authority, could be regarded as notorious facts and so presumably do not need to be addressed in detail in this PIA.¹²¹ The following images show aspects of the 3km locality¹²².



¹²¹ Having regard for the Department's "common-sense approach" direction, the State Government's promotion about making it "easier to do business" in the WA liquor licensing regime and consider sections 16(7)(b) and (c) of the Act

¹²² Various obtained from Google Maps and: <https://www.visitfremantle.com.au/neighbourhoods>, <https://www.destinationperth.com.au/explore-perth/fremantle/> and <https://www.facebook.com/fremantlesailingclub/>



- 9.6. "South Fremantle is significant as an area located to the south of the City of Fremantle with a history of settlement dating back to the mid nineteenth century. The area is significant for: its concentration of mainly modest workers accommodation dating from the Victorian and Federation periods; its cultural diversity resulting from successive periods of migrant settlement in the area; its industrial focus on the industries relating to seafaring including fishing and boat-building along Marine Terrace; its former industrial character resulting from industries such as the former Mills and Wares Factory and the Robbs Jetty meatworks; and its expansion into Beaconsfield and Chesterfield in the 1930s and the subsequent working class residential development of these areas."¹²³
- 9.7. "[T]he concept of 'amenity' in s 38(4)(b) is concerned with the overall character, quality and enjoyment of life within the locality"¹²⁴.
- 9.8. The introduction of ALDI's specialty liquor service into South Fremantle will add choice, diversity and key services for local people. It will enable an already highly popular store become enhanced and bring it up-to-speed with community expectations and other modern neighbourhoods elsewhere.
- 9.9. ALDI South Fremantle will help to support and promote community and neighbourhood identity enabling residents to stay close to home to access groceries and liquor available elsewhere and significantly reduce their need for travel far away from home. ALDI South Fremantle will provide one-stop and one-transaction shopping.
- 9.10. Being just one component of the South Fremantle Market Place, Neighbourhood Centre and broader precinct, plus being only a tiny percentage of the wider ALDI store, the liquor proposal will have minimal impact physically and visually, but it will likely have a positive impact in terms of providing a valuable service. It will complement other businesses and be totally consistent with surrounding land-uses.
- 9.11. From a visual, physical or streetscape perspective, the proposed licensed area will have no impact. It will not even be seen from anywhere other than well inside the ALDI supermarket.
- 9.12. The consumer survey found that 83% of local people consider that the ALDI liquor section will not lessen the amenity of the area.¹²⁵
- 9.13. To reiterate, the proposed liquor section will not have any external frontage, façade or overt signage. It will be contained inside the wider ALDI store footprint. The intended manner of trade is for the liquor service to complement the grocery and household offering in the supermarket. The premises will not operate as a stand-alone liquor outlet.

¹²³ <https://inheriit.dplh.wa.gov.au/public/inventory/details/3f91ab55-ab56-41d8-bcc8-6464a6958d71>

¹²⁴ *Australian Leisure and Hospitality Group Pty Ltd v Commissioner of Police* [2020] WASCA 157 [186] (Buss P)

¹²⁵ PRG report at page 30

- 9.14. Despite the relatively tiny size of the licensed area proposed, the ALDI South Fremantle liquor feature will make a big and valuable contribution towards the services and facilities in the Neighbourhood Centre.
- 9.15. Further submissions addressing the amenity issue under the Act 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's stores have an excellent trading history. They are not known to be the cause of any offence, annoyance, disturbance or inconvenience in relation to any of its many 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 South Fremantle store in terms of how and in what circumstance, the sale and supply of liquor could potentially cause those people undue offence, annoyance, disturbance or inconvenience. It is acknowledged that people do live close by and the surrounding area is mixed-use with residential. Those people are likely to benefit greatly from ALDI's proposed liquor service.
- 10.3. It is not considered that there are any high risk factors associated with this 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. Therefore, ALDI proposes to implement the following strategies, in addition to others referred to elsewhere in this PIA, to manage and minimise risks associated with the operation of the proposed liquor service at the South Fremantle store.
- 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 in South Fremantle 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. The community within, around and visiting the 3km locality stands to benefit enormously from the introduction of the ALDI liquor service. The public will have 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. There is a significant tourism element in this case with nearly a million day trippers visiting Fremantle each year¹²⁶ and having regard for Fremantle being named Australia's Top Tourism Town for 2025.¹²⁷
- 11.3. 30-40 cruise ships (generally) visit Fremantle port each year. There are currently nine scheduled between August and December 2026.¹²⁸
- 11.4. "Fremantle is busy with visitors all year round, but Spring is a particularly nice time of year for tourists to stroll through the hidden laneways, browse in boutique shops, have an al fresco meal on the Cappuccino Strip or head to one of our beautiful beaches or parks for a sunny picnic."¹²⁹
- 11.5. The following is a relatively recent overnight visitor summary for City of Fremantle published by Tourism WA¹³⁰.

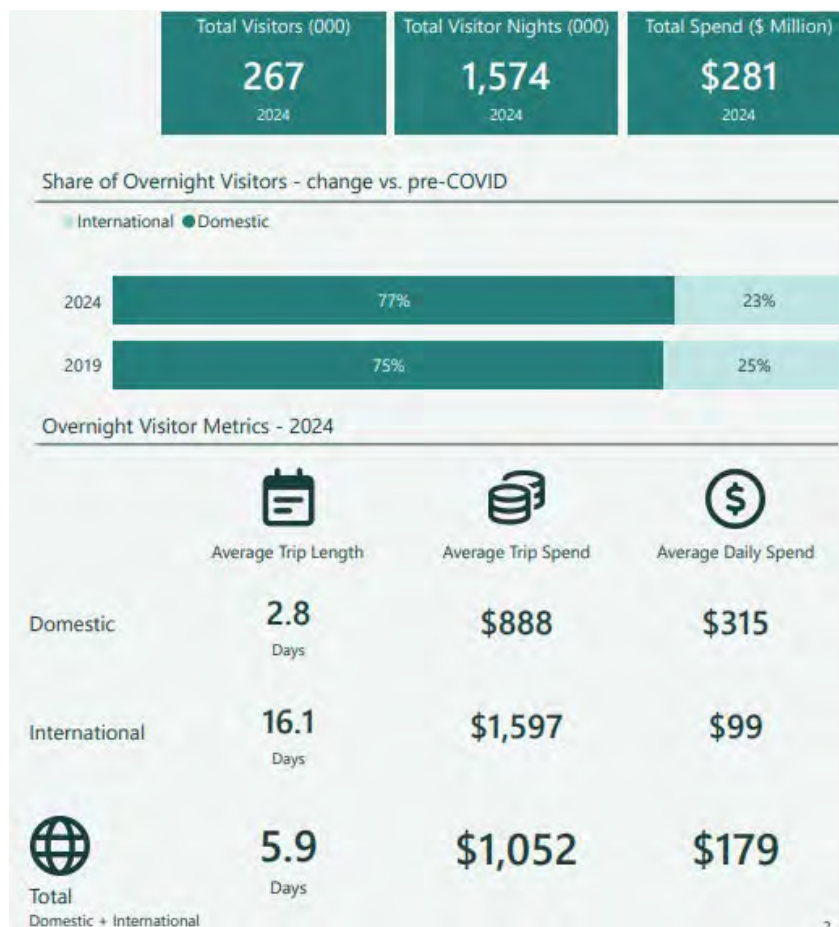
¹²⁶ <https://www.fremantle.wa.gov.au/your-city-and-council/news-and-media/fremantle-crowned-australias-top-tourism-town/>

¹²⁷ <https://www.fremantle.wa.gov.au/your-city-and-council/news-and-media/fremantle-crowned-australias-top-tourism-town/>

¹²⁸ <https://www3.fremantleports.com.au/vtmis/dashb.ashx?db=fmp.public&btn=CruiseShips>

¹²⁹ <https://www.fremantle.wa.gov.au/your-city-and-council/news-and-media/cruise-season-returns-to-fremantle/>

¹³⁰ City of Fremantle Overnight Visitor Factsheet 2024, prepared by Tourism WA Insights and Planning, April 2025 (copy attached) at page 2



- 11.6. There is a dedicated Visitor Centre in Fremantle. It recorded more than 135,000 visitors through its doors in 2024/25, together with having serviced 29,300 cruise ship passengers and crew.¹³¹
- 11.7. Approval of this application will enable ALDI to provide its full suite of products and services at South Fremantle, like it does at most of its other stores around the rest of the world, providing familiarity for tourists in the area, as well as local people, who are accustomed to ALDI's model elsewhere. Further, the ability for ALDI to establish a full-service store in South Fremantle will help to support and promote the South Fremantle Neighbourhood Centre and Market Plan as a modern community retail precinct with commonly expected conveniences.
- 11.8. ALDI is still relatively new to the WA market compared to other retailers. 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 below¹³².

¹³¹ <https://visitfremantle.com.au/sites/default/files/2025-07/Fremantle%20Visitor%20Centre%20-%20Advertising%20Fact%20Sheet%202025%20-%202026.pdf.pdf>

¹³² <https://www.watoday.com.au/national/western-australia/keen-shoppers-brave-cold-for-opening-of-perth-aldi-stores-20160608-gpe297.html>



- 11.9. 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 day¹³³.
- 11.10. These numbers and the details referred to earlier in this PIA as regards the enormous consumer following of and devotion to ALDI products and services show ALDI's significant public popularity. The licensing authority is entitled to take this popularity in account when assessing whether the proposed services in this application will be in the public interest at the South Fremantle location¹³⁴. There are already a massive 8,237 shoppers per week on average at ALDI South Fremantle¹³⁵.
- 11.11. 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 job opportunities for people to work with ALDI.

¹³³ Evidence available if required, upon request

¹³⁴ *Woolworths Ltd v Director of Liquor Licensing* [2013] WASCA 227 [77] (Buss JA)

¹³⁵ PRG report at page 5

- 11.12. 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.
- 11.13. The expert market researcher in this case has concluded that “so many packaged liquor buyers report that they propose using the liquor offer in the ALDI South Fremantle store should the liquor licence be granted. Evidently the ALDI offer will better suit their packaged liquor purchasing needs than the range of outlets currently available to them...It is clear that the great majority of take-away liquor buyers who currently shop at ALDI South Fremantle would shop for their take-away liquor requirements from the ALDI liquor section if it was established. Half (50%) 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 ALDI South Fremantle store...The clear suggestion is that the ALDI South Fremantle liquor section would better meet their takeaway liquor requirements than the currently available South Fremantle liquor outlets.”¹³⁶
- 11.14. “The extent to which buyers would transfer their liquor shopping to ALDI [South Fremantle] should the liquor licence be granted is illustrated in the table [on page 29 of the PRG report]. It shows that 76% of shoppers who purchase their packaged liquor needs at least once a fortnight would shop from the ALDI liquor section at least once a fortnight. Eighty-five per cent would do so at least once a month, and 92% at least sometimes... Amongst buyers who currently shop for packaged liquor products at least once a month, 79% would shop in the ALDI liquor section at least once a month, and 93% at least sometimes... It is clear that shoppers who currently buy packaged liquor would do most of their packaged liquor shopping at the ALDI South Fremantle liquor section if it were established.”¹³⁷
- 11.15. Given the high level of support for the proposed liquor service, coupled with other findings in the PRG report, including that shoppers have accessed ALDI liquor elsewhere, it can be reasonably concluded that there is a leakage factor to consider in this case, whereby local shoppers are currently purchasing liquor outside of their neighbourhood, at other ALDI outlets several kilometres away, because it is not available to them currently at the South Fremantle store.
- 11.16. Further submissions referring to the consumer evidence and how it strongly supports the grant of the licence, have been provided elsewhere in this document and in the accompanying Legal Submissions.
- 11.17. ALDI is a major supporter of local communities, Australian businesses and the wider society. This proposition is explained by the following published ALDI policies.¹³⁸

¹³⁶ PRG report at pages 27 and 28

¹³⁷ PRG report at page 29

¹³⁸ <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>

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

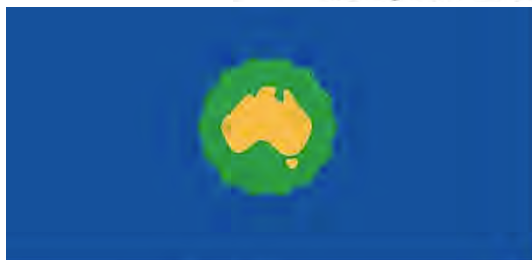
ALDI has been a Camp Quality partner since May 2020, making a yearly cash donation, running employee programs, and donating proceeds from product sales.



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.

- 11.18. The grant of the liquor store licence will enhance and facilitate ALDI's increased involvement in the community comprising the 3km locality. Local residents and workers will be the beneficiaries of this outcome.
- 11.19. 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. It will satisfying unmet consumer demand and requirement and provide the local neighbourhood with the same level and standard of liquor and related services available to other neighbourhoods.

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

- 11.20. ALDI operates with liquor at nearly 350 locations across Australia. As stated previously, 40 of those are in WA. In the eastern states, nearly every ALDI store contains a liquor section.
- 11.21. 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 product and service 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.

- 11.22. None of the existing relevant packaged liquor premises do, or are even potentially capable of providing the liquor service which is demanded based on the evidence in this case.
- 11.23. The demographics of the relevant area include the enormous existing resident population of tens of thousands of people, the huge and constant influx of visitors and special regard for the over 8,000 regular weekly shoppers (average) at ALDI South Fremantle currently¹³⁹.
- 11.24. Earlier in this PIA it was identified that the average age of residents in the 3km locality is several years older than the State average and there is a higher portion of residents aged over 65¹⁴⁰. In these circumstances, the notion and function of the site in terms of being a neighbourhood centre and the associated concept of walkability have greater relevance. The City of Fremantle has a published strategy of being “age friendly” and wanting to provide “opportunities for access to local services in each neighbourhood”¹⁴¹. ALDI’s specialised liquor range and related services, which is massively popular in many other neighbourhoods but not nearby in this case could support these equitable goals if made available in South Fremantle to enhance local services and the walkability of the shopping precinct.
- 11.25. The currently operating licensed premises relevant to this application do nothing for shoppers at ALDI South Fremantle seeking one-stop ALDI shopping and they certainly do not address the demand for ALDI liquor itself.
- 11.26. The addition of the ALDI liquor section at the South Fremantle store will, in effect, result in a self-sufficient retail outlet. Responsible adults living locally 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 in one trolley, noting that most of those products are exclusive to ALDI.
- 11.27. It is relevant to reiterate and highlight findings of the expert market researcher referred to earlier in this PIA in relation to the leakage of spending and unnecessary travel currently be endured by local people¹⁴². The ALDI store will eliminate this.

¹³⁹ PRG report at page 5

¹⁴⁰ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51368> (South Fremantle), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51593> (White Gum Valley), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50086> (Beaconsfield), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50641> (Hilton), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50522> (Fremantle), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL51135> (North Coogee), and <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL50609> (Hamilton Hill)

¹⁴¹ City of Fremantle Local Planning Strategy, 5 February 2026 (copy available if required, upon request), at page 33 and 34

¹⁴² PRG report at pages 17, 18, 27 and 28

- 11.28. The following was reported in relation to ALDI winning the coveted Canstar Australian Supermarket of the Year for the eighth year in a row¹⁴³:

"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.'"

- 11.29. The large majority of ALDI's proposed liquor range at the South Fremantle store will be its reliable own-brand. Approval of the licence will make quality, affordable and award-winning liquor available to the local community.
- 11.30. People within the community who experience lower socio economic conditions should be entitled to benefit equally from ALDI's value-for-money proposition with affordable award-winning liquor, as other communities do elsewhere.
- 11.31. National Liquor News reported the following statements and quotes¹⁴⁴ which corroborate various points made in this PIA and further support the application:
- 11.31.1. "ALDI's reputation for value attracts customers, with growth outpacing the market without relying on aggressive promotions."
- 11.31.2. "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."
- 11.31.3. "ALDI's reputation for delivering value has been key to attracting more customers to its liquor range."

¹⁴³ <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>

¹⁴⁴ "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.>)

- 11.31.4. "[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'."
- 11.31.5. "Amid ongoing cost-of-living pressures, ALDI is committed to offering high-quality products at competitive prices."
- 11.31.6. "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."

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"¹⁴⁵ 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"¹⁴⁶.
- 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 South Fremantle is far from a proposal for a full and traditional liquor store licence. It is a critical factor that the packaged liquor to

¹⁴⁵ Liquorland Karrinyup [75] (Archer J)

¹⁴⁶ Explanatory Memorandum, Liquor Control Amendment Bill 2018 at page 1

be available will be of a discrete and limited nature. The full ambit of "liquor" and 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 a packaged liquor specialist, involving a very narrow and discrete packaged liquor range, can be approved to hold a licence for a packaged liquor premises in appropriate cases¹⁴⁷. More specifically, the licensing authority has determined that an application may satisfy section 36B of the Act and be granted where the particular type of packaged liquor to be sold and supplied under the licence is limited and/defined¹⁴⁸ and most relevantly, that has included approval of ALDI licences under the current law¹⁴⁹. This present application falls squarely within that category and is in fact a stand-out example of such an outlet.
- 12.9. With reference to the outlet density information and existing licensed premises referred to earlier in and attached to this PIA, the relevant "packaged liquor premises" to be considered in the context of this case in terms of section 36B of the Act are the following (listed in the order as appear in the attached list and the Department's database):

12.9.1.	South Beach Hotel	12.9.11.	Hougoumont Hotel
12.9.2.	Liquorland South Fremantle	12.9.12.	Australia Hotel Fremantle
12.9.3.	Dan Murphy's South Fremantle	12.9.13.	The Wray Hotel
12.9.4.	Running With Thieves	12.9.14.	Flight Club Fremantle
12.9.5.	South Street Liquor	12.9.15.	Bar Orient
12.9.6.	BWS – Beer Wines Spirits Beaconsfield	12.9.16.	Harbourside Freo
12.9.7.	The Federal Boutique Hotel	12.9.17.	The Local Hotel South Fremantle
12.9.8.	The National Hotel	12.9.18.	Benny's Bar & Café
12.9.9.	Norfolk Hotel Fremantle	12.9.19.	Clancy's Fish Pub
		12.9.20.	Sail & Anchor
		12.9.21.	Liquorland Fremantle
12.9.10.	P & O Hotel	12.9.22.	Fremantle Bottleshop

¹⁴⁷ 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) and Commune Wine Store (Subiaco - 603220029123)

¹⁴⁸ 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) and Commune Wine Store (Subiaco - 603220029123)

¹⁴⁹ ALDI Yanchep (603220993723), ALDI Innaloo (603222726424), ALDI Karrinyup (603222913525), ALDI Whitfords (603222858025), ALDI Haynes (603223489225), ALDI Willetton (603223397025), ALDI Beechboro (603223240125), ALDI Albany (603223962525) and ALDI Dalyellup (603224053325)

- | | |
|---|--|
| <p>12.9.23. The Freo Doctor Liquor Store</p> <p>12.9.24. Wardens Hotel</p> <p>12.9.25. Freo Social</p> <p>12.9.26. Republic of Fremantle</p> <p>12.9.27. Shenanigans Sports Bar</p> <p>12.9.28. Gage Roads Brew Co</p> <p>12.9.29. Heroes & Comrades Urban Winery</p> | <p>12.9.30. Wise Child Wine Store (tavern)</p> <p>12.9.31. Wise Child Wine Store (liquor store)</p> <p>12.9.32. <i>Suspended</i>: Union Brewery & Distillery Fremantle</p> <p>12.9.33. <i>Suspended</i>: Tolley's Lane</p> <p>12.9.34. <i>Suspended</i>: Moon and Mary</p> |
|---|--|
- 12.10. In regard to packaged liquor premises located further afield, up to 3km away they are the following (listed in the order as appear in the attached list and the Department's database):
- 12.10.1. South Street Ale House
 - 12.10.2. Liquorland Hilton
 - 12.10.3. BWS – Beer Wine Spirits Port Coogee
 - 12.10.4. The Hilltop Br & Bistro
 - 12.10.5. Carringtons Bar & Grill
 - 12.10.6. Crafty Corner Hamilton Hill
- 12.11. None of the holders of any of the existing licences does, nor is even able to, sell or supply the applicant's exclusive range.
- 12.12. Further, nearly 100% of products at all of those existing outlets would never be available at the ALDI South Fremantle store.
- 12.13. As addressed earlier in this PIA, multiple other factors also differentiate the existing and proposed liquor models. In fact, there can hardly be any comparison.
- 12.14. The Dan Murphy's outlet and Liquorland South Fremantle are located in the same Market Place/Neighbourhood Centre as ALDI. This circumstance does not diminish the compelling factors in favour of the grant, nor inhibit the new licence being approved. There are many cases of multiple packaged liquor premises approved to be nearby to each other. In this case, ALDI South Fremantle's liquor service will have many stark differences. Among those many differences will be ALDI's unique stock range and the one-stop convenience which ALDI will provide whilst the others do not. Neither the Liquorland nor the Dan Murphy's are directly associated with a supermarket.
- 12.15. Notably, people who participated in the expert consumer market research would presumably have been very well aware of the existence of Dan Murphy's and Liquorland South Fremantle whilst providing their clear and persuasive

evidence in support of the ALDI licence, as to ALDI's many differences and as to their desire and intention to purchase liquor from ALDI South Fremantle.

- 12.16. Existing packaged liquor premises within the 3km locality collectively offer a wide stock range including most liquor styles of beer, wine, spirits and derivatives thereof. The outlets include walk-in browsing stores of small, medium and large format, minor over-the-counter services, a few with drive-through services and one big-box format. Several of the premises listed do not actually sell any packaged liquor and some provide only a very small and specialist range of own-product.
- 12.17. The existing Liquorland and BWS outlets identified offer a standard, mainly routine, mainstream, range of both refrigerated and warm liquor across all of the usual categories in terms of beer, wine and spirits.¹⁵⁰ These stores are traditional in terms of having a browse area and coolroom. The licensing authority can be presumed to be very familiar with their models as there are at least 264 such outlets operating in WA¹⁵¹.
- 12.18. The Liquorland and BWS ranges and store styles are virtually duplicates of each other. They are presumably 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 mass-produced facilities and their own home-brand within traditional format outlets. Very similar stock range is offered at the Dan Murphy's outlet¹⁵², in larger volumes.
- 12.19. The Liquor Commission found in ALDI Harrisdale that there "is a significant diversity between the products sold by ALDI and the BWS store."¹⁵³
- 12.20. The following features of the ALDI South Fremantle proposal are just some of the glaring additional differences between it and existing outlets, over and above the major distinction of ALDI's mainly exclusive range:
- 12.20.1. small size,
 - 12.20.2. layout,
 - 12.20.3. location,
 - 12.20.4. one-stop-shopping convenience,
 - 12.20.5. absence of coolroom,

¹⁵⁰

https://www.liquorland.com.au/?cid=LL:cpcggl:Brand|Liquorland|HeadTerms|AUS|Exact&gclid=aw.ds&gad_source=1&gad_campaignid=1539020582&gbraid=0AAAAADtdQ6tsCNSja38bZGoBgOEKpOhea&gclid=EALalQobChMI4N-7kKmFkwMV7aRmAh1gSSdXEAAAYASAAEgl-hvD_BwE and https://bws.com.au/?utm_source=google&utm_medium=cpc&utm_campaign=Brand%20-%20Pure%20-%20Exact&utm_term=bws&gclid=aw.ds&e_cid=ps:ds:GOOGLE:Brand%20-%20Pure%20-%20Exact:Brand%20-%20Pure:ds_keywords%3Dds_kw:bws&gad_source=1&gad_campaignid=9871972715&gclid=EALalQobChMI4N-7kKmFkwMV7aRmAh1gSSdXEAAAYASAAEgl-hvD_BwE

¹⁵¹

<https://portal.dlgsc.wa.gov.au/licencesearch?status=Current&location=%25liquorland%25&group=Liquor+Premises> and <https://portal.dlgsc.wa.gov.au/licencesearch?status=Current&location=%25BWS%25&group=Liquor+Premises>
¹⁵² https://www.danmurphys.com.au/stores/wa-south-fremantle?srltid=AfmBOopNTen_TPfywbapDz0-p6SyLFw1QJlrodB-wFd-R2e7J7J6BcND

¹⁵³ [43(g)]

- 12.20.6. absence of prominent product advertising and
- 12.20.7. absence of refrigeration.
- 12.21. "[S]even in ten (70%) of take-away liquor buyers believe that liquor section in the ALDI South Fremantle store would be different from the current liquor outlets. This proportion is slightly elevated (to 72%) amongst alcohol buyers who have been in a licensed ALDI store, and increases to 78% amongst those who have consumed exclusive ALDI liquor products."¹⁵⁴
- 12.22. PRG concluded from this research that "the great majority of take-away liquor buyers who currently shop at ALDI South Fremantle would shop for their take-away liquor requirements from the ALDI liquor section if it was established. Half (50%) 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 ALDI South Fremantle store"¹⁵⁵. These percentages translate to thousands of weekly shoppers given that the store has an average 8,237 shoppers per week¹⁵⁶ and having regard for the expert survey sampling methodology¹⁵⁷.
- 12.23. "The extent to which buyers would transfer their liquor shopping to ALDI should the liquor licence be granted... shows that 76% of shoppers who purchase their packaged liquor needs at least once a fortnight would shop from the ALDI liquor section at least once a fortnight. Eighty-five per cent would do so at least once a month, and 92% at least sometimes... Amongst buyers who currently shop for packaged liquor products at least once a month, 79% would shop in the ALDI liquor section at least once a month, and 93% at least sometimes... It is clear that shoppers who currently buy packaged liquor would do most of their packaged liquor shopping at the ALDI South Fremantle liquor section if it were established"¹⁵⁸.
- 12.24. To reiterate, none of the existing licensed premises do, nor is even able to, sell or supply the applicant's exclusive range and nearly 100% of products at those existing premises would never be available at the ALDI South Fremantle store. Therefore, a separate itemised comparison of stocklists and related services, as between the ALDI South Fremantle proposal and existing packaged liquor premises, has not been included with this PIA. The applicant relies on the information and evidence provided with this application and the licensing authority's findings in previous cases regarding the differences of ALDI's proposal¹⁵⁹. Should the licensing authority consider in this case that such itemised comparison is required, then it is respectfully submitted that the licensing authority should provide a request for such, as contemplated in the Public Interest Assessment information factsheet/policy¹⁶⁰.

¹⁵⁴ PRG report at page 27

¹⁵⁵ PRG report at page 28

¹⁵⁶ PRG report at page 5

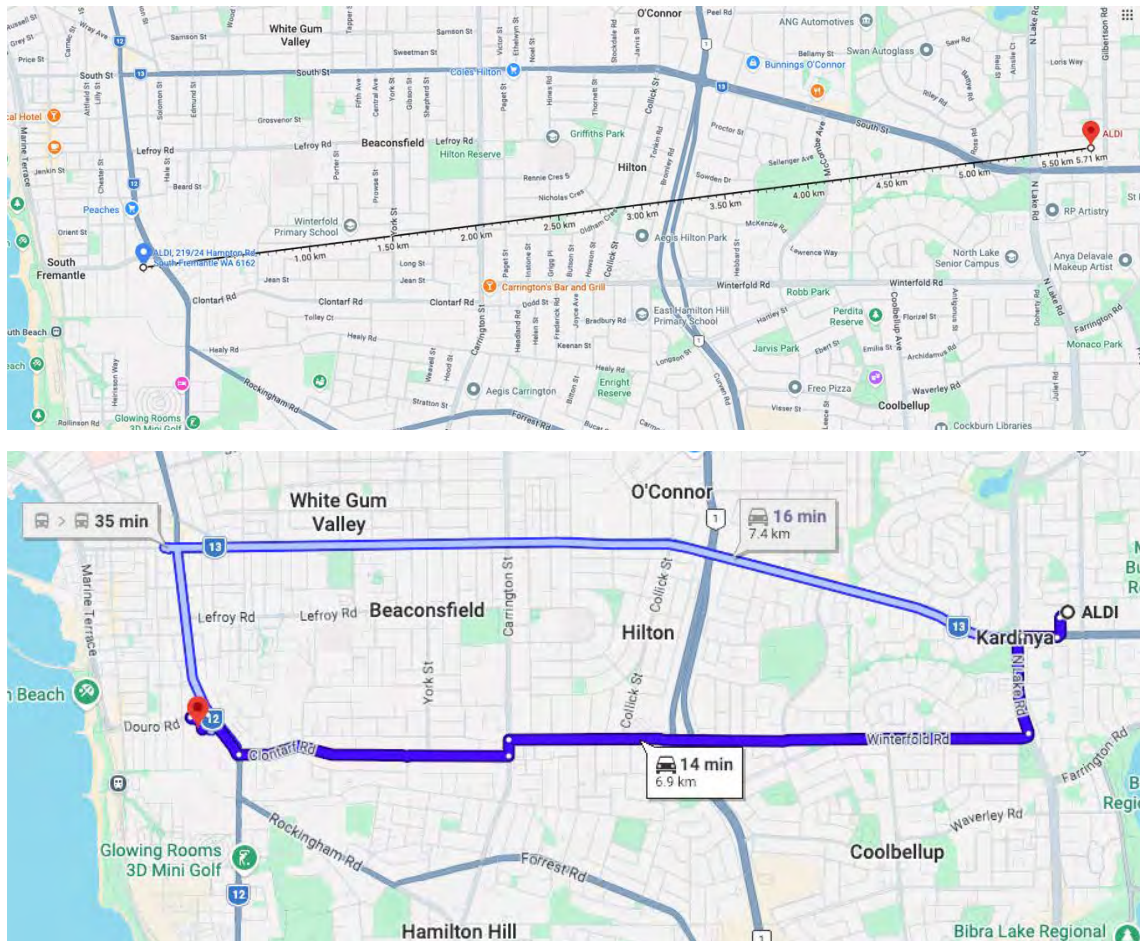
¹⁵⁷ PRG report at page 5

¹⁵⁸ PRG report at page 29

¹⁵⁹ For example, A219302652

¹⁶⁰ <https://www.dlgsc.wa.gov.au/department/publications/publication/public-interest-assessment>

- 12.25. The nearest ALDI liquor service for shoppers at South Fremantle is in Kardinya nearly 6km away, one way/straight line and around 7km driving one-way, travelling through several other suburbs, major roads, busy traffic and into a completely different district. These factors are illustrated in the Google Maps images below:



- 12.26. Accessibility for those in the 3km locality seeking ALDI's liquor range is currently timely, expensive, inconvenient and archaic for a modern metropolitan area. These circumstances will be alleviated for those living and working in South Fremantle, if the application is approved.
- 12.27. Given that ALDI's liquor model contemplates relatively small-volume purchases, the current complicated and time-consuming exercise for South Fremantle shoppers accessing ALDI liquor elsewhere is submitted to be irrational and unreasonable.
- 12.28. Given the role of the South Fremantle Neighbourhood Centre, it is essential that the ALDI South Fremantle provide ready access to usual modern conveniences and diversity. It is unreasonable for people in South Fremantle, which is a modern part of the metropolitan area, to be denied contemporary choice and competition. These propositions are strongly supported by the following, as referred to earlier in this PIA:

- 12.28.1. Walkability requirement for the site because of its Neighbourhood Centre classification.
- 12.28.2. The City of Fremantle's published strategy of being "age friendly" and wanting to provide "opportunities for access to local services in each neighbourhood"¹⁶¹.
- 12.29. 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"¹⁶².
- 12.30. 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 South Fremantle store.
- 12.31. Almost 100% of applicant's stock range will be unavailable elsewhere in the 3km locality.
- 12.32. To reiterate, the following are key distinguishing features of the ALDI liquor proposal:
 - 12.32.1. The majority of ALDI's products are exclusive and not available at any of the other liquor outlets.
 - 12.32.2. The display/browse area will only comprise approximately 30m², significantly smaller than many of the other packaged liquor outlets. The bespoke ALDI liquor service will be an ancillary but highly valuable component of its overall service in South Fremantle which is projected to be even more popular and even more well patronised
 - 12.32.3. There will be no refrigerated liquor products. This is a harm minimising feature of the ALDI liquor service and speaks to its genuine intention to complement its household and grocery offering.
 - 12.32.4. None of the other packaged liquor outlets can offer one-stop-shopping convenience to ALDI shoppers.
- 12.33. Further and more detailed submissions regarding section 36B of the Act are contained in the accompanying Legal Submissions.

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

- 13.1. Relevant provisions of the Act have been taken into consideration in the preparation of the Form 2A, this PIA and the whole application, including sections 5, 33, 36B and 38. Submissions addressing those and other relevant parts of the Act have been briefly referred to in this document but are detailed in a separate Legal Submissions accompanying the application.

¹⁶¹ City of Fremantle Local Planning Strategy, 5 February 2026 (copy available if required, upon request), at page 33 and 34

¹⁶² Liquorland Karrinyup [108] (Archer, J)

- 13.2. It is respectfully submitted that the licensing authority should be easily satisfied that in relation to ALDI South Fremantle, 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” requirements¹⁶³.

14. Conclusion

- 14.1. This PIA responds to the Form 2A thoroughly and addresses relevant sections of the Act with specific reference to particulars of the application.
- 14.2. The applicant has focused attention on a wide variety of relevant public interest factors, existing packaged liquor premises and other issues arising under the Act. Consequently, it has presented a comprehensive proposal for the grant.
- 14.3. To reiterate, the proposal is for a modest liquor range comprising largely award winning, value-for-money, exclusive products, to be available through a modern one-stop-shop concept that has the potential to offer an unrivalled level of convenience for shoppers in the South Fremantle Neighbourhood Centre and beyond and has been proven very popular elsewhere. The proposal is a replica of the Australian Supermarket of the Year for the last eight consecutive years¹⁶⁴.
- 14.4. The ALDI South Fremantle liquor service will be unique, not only in the s36B locality but also in the wider 3km locality and beyond. The products and style of operation will be almost entirely unlike the limited diversity of existing products and services available to the already enormous and increasing community.
- 14.5. 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 [27] 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 consumers of liquor, thus being consistent with the primary object set out in section 5(1)(c) of the Act.”¹⁶⁵
- 14.6. To reiterate, the expert market research has found that “the great majority of take-away liquor buyers who currently shop at ALDI South Fremantle would shop for their take-away liquor requirements from the ALDI liquor section if it was established. Half (50%) 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

¹⁶³ Liquorland Southern River [136] [137] (Lemonis J)

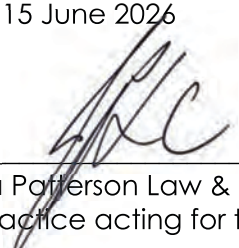
¹⁶⁴ <https://www.roymorgan.com/findings/roy-morgan-unveils-annual-customer-satisfaction-award-winners-across-all-categories-2023>; <https://www.skynews.com.au/lifestyle/celebrity-life/customers-know-they-can-rely-on-us-aldi-crowned-supermarket-of-the-year-for-the-eighth-year-in-a-row-by-canstar-blue/news-story/a566dfe9b507fb1c0892917532618a0d>

¹⁶⁵ [42]

established within the ALDI South Fremantle store"¹⁶⁶. These percentages translate to thousands of weekly shoppers given that the store has an average 8,237 shoppers per week and the expert survey sampling methodology¹⁶⁷.

- 14.7. Further submissions addressing conclusions to be drawn from the information contained in this PIA and supporting the grant of the licence as proposed are contained in the applicant's separate set of detailed Legal Submissions.

Dated 15 June 2026



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

Attachments	
No.	Title/description
1.	PRG report
2.	Stocklist, including identification of the ALDI exclusive products (subject to change)
3.	List of some awards received by ALDI
4.	9 News Perth Facebook, 15 June 2016
5.	City of Fremantle Town Planning Scheme No. 4 (District Scheme) map
6.	REIWA suburb profiles – 3km locality
7.	List of community buildings
8.	List of existing licensed premises located in the s36B locality
9.	List of existing licensed premises located in the 3km locality excluding those located in the s36B locality
10.	Police Offence Data Summary
11.	City of Fremantle Overnight Visitor Factsheet 2024, prepared by Tourism WA Insights and Planning, April 2025

¹⁶⁶ PRG report at page 28

¹⁶⁷ PRG report at page 5