



Alcohol delivery in WA: Results from an audit of online alcohol retailers prior to and following the introduction of WA Liquor Delivery Regulations

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Executive summary

The increase and expansion of online alcohol retailers with a delivery service represents a shift in alcohol availability and the ease with which alcohol can be accessed. Recent changes to regulations have occurred in Western Australia (WA) and in other jurisdictions, but in general, they fall short of the recommended standards to prevent harm, specifically to prevent delivery of alcohol to people under 18 years, and to people who are intoxicated.

The risks associated with the online sale of alcohol are likely to increase where robust age verification processes and checks for intoxication are absent, and where rapid, late-night, and unattended deliveries are allowed. Additionally, there is growing concern around alcohol marketing that uses data and algorithms to target people most susceptible to marketing and that includes ‘buy now, pay later’ options and a ‘click to buy’ option.

This project sought to build a picture of how alcohol was being sold online for delivery prior to, and six months following the introduction of WA Liquor Delivery Regulations in February 2022. From November 2021 to January 2022, the Alcohol Programs Team at Cancer Council WA conducted a baseline audit prior to the introduction of WA Liquor Delivery Regulations (audit 1), which comprised 42 online alcohol retailers operating in the Perth metropolitan area.

A second audit was conducted following the introduction of regulations (audit 2) from July to August 2022 also comprising 42 online alcohol retailers. Following consultation with the Department of Local Government, Sport and Cultural Industries, the methodology for audit 2 was adapted, to observe services operating both in Perth, and in select regional locations (Northam, Bunbury, Albany, Kalgoorlie, Geraldton, Carnarvon, Karratha and Broome).

An audit tool was used to capture information from retailer websites and their social media pages including age-verification processes, prices, payment methods, policies and delivery terms, the timeframe and cost for deliveries, and promotional strategies. The findings highlight a range of high-risk features among online alcohol retailers operating in WA:

- Almost one third (n=12, 29%) of online alcohol retailers delivering alcohol to Perth and regional locations held an interstate liquor licence.
- Processes for age verification were non-existent with no form of identity verification required at the online point of sale for any of the retailers observed in either of the audits.
- Alcohol could be delivered to Perth rapidly in under 1-2 hours from nine retailers (22%), an increase from seven rapid delivery services (17%) in the first audit, prior to the introductions of the regulations. Whilst this is a small number, these retailers may service large areas of Perth.
- Alcohol deliveries could be left unattended at the delivery address under some circumstances. The number of retailers stating that deliveries could not be left unattended decreased between the first and second audits, possibly because the new regulations make clear the conditions under which deliveries can be left unattended.

- There was little change in the offering of late-night delivery between the first and second audits and no retailers offered delivery later than 11pm in either audit.
- Alcohol could be purchased cheaply online including 2L cask wine for under \$20 and 4L cask wine for under \$25, available from almost half of retailers (n=18, 43%). There was an increase in the number of retailers offering cheap cask wine products for delivery in the second audit, however, this may be due to the exclusion of gift delivery services, which generally have higher product prices.
- Cheap alcohol products could be delivered to regional locations by half of the retailers observed (n=23, 55%) in the second audit.
- Free delivery was offered with a minimum purchase threshold among half of the retailers observed. Alternatively, delivery costs were low, starting from \$2-\$10.
- Delayed payment options (buy now, pay later) were available through some retailers (n=8, 19%).
- Policies and processes to minimise harm were inconsistent, for example, policies regarding deliveries to intoxicated people and processes to self-exclude from delivery services were only visible for one in four retailers (n=11, 26%) in the second audit.
- Promotions for online alcohol retailers included personalised incentives, price promotions, free or fast delivery and buy now, pay later deals. Social media pages were not always age-gated to exclude users under 18 years of age.

The purpose of these audits was to observe the characteristics of online alcohol retailers before specific alcohol delivery regulations were in effect in WA, and to understand what changes have taken place since the introduction of the WA Liquor Delivery Regulations and the continued development of harm minimisation measures in other jurisdictions. The online alcohol marketplace is continuing to expand, and this study highlights several areas where strengthened regulatory measures can mitigate the existing high-risk aspects of alcohol delivery in WA. These include limiting the availability of rapid and late-night deliveries, ensuring that alcohol is not purchased online by underage people and prohibiting any alcohol delivery from being left unattended. Additionally, policy makers, researchers, and advocates would benefit from timely access to sales and delivery data to inform future research to ensure that the businesses conducting the most deliveries are examined.

Introduction

Opportunities to buy alcohol products online and have them delivered have increased rapidly in recent years and alcohol industry analysts are expecting these services to continue to grow (IBISWorld, 2022; International Wine and Spirits Research, 2021). The expansion of these services represents a shift in alcohol availability and the ease with which alcohol can be accessed (Colbert et al. 2021; Colbert, Thornton, et al., 2020). Recent changes to regulations related to these services have occurred in WA, New South Wales (NSW) and Victoria, and regulations are under review in South Australia and Queensland. Reforms in NSW include new offences for delivering alcohol to a minor or an intoxicated person, the introduction of digital age verification at the online point of sale, and the reporting of same day delivery data (NSW Government, 2021). In general, existing state-based regulations fall short of the standards recommended by alcohol harm prevention and public health organisations (Alcohol Change VIC, n.d.; Foundation for Alcohol Research and Education, n.d.).

Risks associated with delivery of alcohol

Emerging evidence suggests that some types of alcohol delivery services are associated with higher risks to the community (Mojica-Perez et al., 2019). On-demand deliveries enable people to keep drinking when they would otherwise stop and access more alcohol when they are unable to drive (Mojica-Perez et al., 2019). Research has found that rapid delivery services, which can deliver alcohol in under two hours, are used by people that drink at high risk levels (Huckle et al., 2021; MacLean et al., 2022), and that deliveries are regularly made to people who are intoxicated (Mojica-Perez et al., 2019). Alcohol-related harm affects not only the drinker but other people, particularly where heavy drinkers are involved (A.M. Laslett et al., 2019) and services that deliver alcohol late at night are of particular concern because alcohol-related family violence and suicide peak late at night (Foundation for Alcohol Research and Education, 2022; Laslett et al., 2015). An alcohol delivery service is currently under investigation over frequent, rapid alcohol deliveries made to a person in NSW in the weeks leading up to their death (Thompson & Ward, 2021).

It is suggested that alcohol can be easily accessed by young people on the internet and via delivery (van Hoof et al., 2014; Williams & Ribisl, 2012). Australian research shows that delivery drivers regularly fail to check identification when making deliveries and often leave alcohol unattended at the delivery address (Mojica-Perez et al., 2019). This is concerning, given alcohol is a contributor to all leading causes of death for young people globally, including injury, road crashes, and suicide (Griswold et al., 2018).

Marketing of alcohol online

The evidence shows that alcohol marketing directly influences young people's drinking behaviours (Gupta et al., 2018; Sargent et al., n.d.; Sargent & Babor, 2020), and voluntary advertising codes fail to protect young people from exposure to persistent alcohol marketing online, including via social media (Jongenelis et al., 2021; Noel et al., 2017).

There are concerns about the ways in which targeted marketing strategies by alcohol companies are extended to children and young people online (Carah & Brownbill, 2022). Recent studies have observed targeted promotions by online alcohol retailers including price promotions, fast or free delivery, new 'better for you' products, and linking alcohol to the creation of experiences around particular times and events (Colbert et al., 2022). Further, digital promotions by online alcohol

retailers are seen to facilitate the purchase of alcohol with targeted ‘buy’ buttons (Carah & Brownbill, 2022).

Alcohol delivery in WA

Given the continuing growth in delivery as a mode of alcohol supply, it is important to understand how businesses that provide this service are operating, and the implications for community safety and wellbeing. To our knowledge, there is no accessible data regarding online alcohol sales and/or deliveries of alcohol for the purposes of research, and little is known about how these services are used in WA. Further, it is difficult to ascertain which businesses are operating such services in WA and how many licensees are able to operate in this manner under their liquor licence.

To better understand the changing landscape of alcohol availability in WA, Cancer Council WA conducted desktop research to explore key features of businesses offering the online sale and delivery of alcohol. This project sought to build a picture of how alcohol was being sold online for delivery prior to (audit 1), and following (audit 2) the introduction of WA Liquor Delivery Regulations in February 2022 (Government of Western Australia, 2022b).

Methods

Audit tool

We used an audit tool (Excel spreadsheet) to examine businesses offering the online sale and delivery of alcohol in WA based on their publicly accessible online information. The tool supported the systematic collection of data for approximately thirty variables (Appendix I) to investigate:

- the types of businesses offering an online sale/ delivery of alcohol service;
- the age-verification processes in place at the online point of sale and point of delivery;
- the timeframe for deliveries in the Perth Metropolitan area and WA's regional centres;
- pricing, discounts, quantity limits and payment methods; and
- the promotional strategies used to acquire and retain customers (audit 1 only).

Retailer selection

To identify the audit samples, we conducted Google searches to extract the first 50 websites for retail businesses offering the online sale and delivery of alcohol (hereafter referred to as 'online alcohol retailers'). Paid Google ads and websites providing reviews (e.g., 'best alcohol delivery services') were not included in the sample.

The search for the audit 1 sample was conducted in November 2021 using the key words 'alcohol delivery Perth'. Businesses were excluded ($n=12$) (Appendix II) if an online order for alcohol products for delivery to the Perth metropolitan area could not be made. Additional well-known online alcohol retailers were added ($n=4$) even though they did not appear in the first 50 websites, summing a total sample of $n=42$ online alcohol retailers for inclusion in the audit (Appendix III). For audit 1, businesses were included if they appeared to be operating without a liquor licence, under an exemption to the WA Liquor Control Act 1988 for businesses marketed for the purposes of the sale and delivery of gifts (Government of Western Australia, 2011).

The search for audit 2 was conducted in July 2022 using the key words 'alcohol delivery WA' to extract an initial sample ($n=50$). Additional searches were conducted using the name of a regional centre in each WA region; Northam, Bunbury, Albany, Kalgoorlie, Geraldton, Carnarvon, Karratha and Broome, for example: 'alcohol delivery Northam'. The first 50 websites from each regional search were compared to the initial sample and a further $n=21$ websites were extracted from the combined regional location search summing $n=71$ websites. Businesses were excluded ($n=24$) if an online order for alcohol delivery to any of the search locations could not be made to any of the search locations. For audit 2, businesses were excluded if they appeared to be operating without a liquor licence under an exemption to the WA Liquor Control Act 1988 for businesses marketed for the purposes of the sale and delivery of gifts ($n=17$) (Government of Western Australia, 2011). This resulted in total sample of $n=42$ online alcohol retailers for inclusion in audit 2 (Appendix III).

Data collection

Data were collected using the audit tool by accessing each retailer's website and screenshots were taken to illustrate examples. Audit 1 was conducted between November 2021 and January 2022. One researcher (KB) collected data for all included retailers ($n=42$) and a second researcher (JS) collected data for a randomly-selected sub-sample of retailers ($n=5$) to gauge inter-coder reliability. Audit 2 was conducted between July and August 2022. One researcher (KB) collected data for all included retailers ($n=42$) in audit 2 and a second researcher (DK) collected data for a randomly-selected sub-sample of retailers ($n=5$) to gauge inter-coder reliability.

For both audits, the Department of Local Government, Sport and Cultural Industries: Racing, Gaming and Liquor ‘Find a Licence’ page was used to verify the liquor licence details of each retailer (Government of Western Australia, 2022a).

The purchasing/checkout process was observed by adding alcohol products to the shopping cart and proceeding through the checkout stages; however, no payments were completed and no deliveries were received. Where we were able, we observed the checkout process by checking out as a ‘guest’; however, some websites required the researchers to register an account. To do this, we used a false name, an address selected at random in the Perth metropolitan area and each regional location, an email address created for the study, and a mobile number belonging to one of the researchers.

Where data were not found on any of the website pages, the field was recorded as NS (not specified) or NA (not applicable).

Promotional strategies were only explored during audit 1. To do this, the terms that appeared in the Google listing for each of the retailer websites and the appearance of paid Google advertisements were recorded. Data for promotional strategies was obtained by searching the social media pages of the retailers. These data were only captured for retailers that had active Facebook or Instagram pages. Facebook Ad Library (Meta, n.d.) was also searched to obtain information on paid advertisements for the retailers audited. Qualitative data were recorded for the ways in which online sales and delivery was promoted on the retailer website homepage, and on the social media pages for each retailer if they existed. We also recorded observations of other promotional strategies by retailers that promoted online sales and/or delivery during the audit period.

Data handling and analysis

The small number of coding differences were discussed between the researchers and resolved. Data for variables with binary and categorical codes were counted and qualitative data were coded by grouping into emerging categories.

In audit 1, product prices were examined to calculate the range and mean of the cheapest prices for a selection of common products which were sold on the majority of retailer websites (carton of 24 beers, 750ml bottle of wine, 700ml bottle of vodka). The results from this product price analysis were used to identify six very cheap alcohol product categories:

- Wine - 750ml bottle for \$10 and under
- Wine - 750ml bottle for \$5 and under
- Wine – 2L cask for \$20 and under
- Wine – 4L cask for \$25 and under
- Beer - carton of minimum 24 containers for \$40 and under
- Vodka - 700ml bottle (min 30% ABV) for \$35 and under

In audit 2, product prices were examined and data were recorded as to whether the retailer offered products in the six very cheap alcohol product categories above.

We looked at the retailer policies and terms and conditions for reference to harm minimisation characteristics such as the option for customers to self-exclude from the service, explicit policies that did not allow for alcohol deliveries to be left unattended, and policies or terms for refusing delivery to people who are under 18 years or intoxicated.

Without access to sales and delivery data from alcohol retailers, it was not possible to stratify retailers according to the size or scale of the business. However, retailers were identified as 'higher risk' if they offered very cheap alcohol products, rapid delivery, and for the second audit, if they could deliver very cheap alcohol products to regional locations. The higher risk retailers were examined further in terms of the presence or absence of other high-risk features such as the availability of late-night (after 10pm), free or low-cost delivery, and/or buy now pay later options.

We examined the examples of promotions by online alcohol retailers to identify common themes in audit 1. We did not seek to repeat the full collection of promotions for audit 2, however, some promotional factors were examined, including whether delayed payment services were promoted.

Results

The following results comprise data collected during the audit 2 (post-regulations) conducted from July-August 2022. The exception is the inclusion of promotional strategies observed during audit 1 (pre-regulations). The combined results from audit 1 and audit 2 are presented in the discussion.

Retailer type and channels for alcohol sales

The retailers included dedicated liquor retailers (n=35), venues (tavern/bar) (n=3), supermarkets (n=2), catering (n=1), and a music retailer selling records and music related merchandise (n=1). Two of these services (n=2) also operated as a third-party deliverer for other businesses; one of these was a catering service, and the other was a dedicated liquor retailer. An in-depth analysis of the ownership, operation and revenue of the businesses was beyond the scope of this study; however, the key characteristics relating to the regulation of the sale and supply of alcohol are outlined below (Table 1).

In addition to the online store, the majority (n=32, 76%) of retailers also operated physical retail premises and some (n=11, 26%) operated a software application (app) from which alcohol could be purchased for delivery. The audit only examined the online store available at the retailer's website; the physical stores and apps were not examined.

Payment methods

All of the retailers accepted credit card payments and most (n=25, 60%) linked to online payment services including PayPal, Google Pay, Apple Pay, Shop Pay, and Fly Pay. Around one in five (n= 8, 19%) offered a dedicated buy now, pay later service such as Afterpay, ZIP and Latitude.

Table 1. Business characteristics of online alcohol retailers (Audit 2)

Business characteristics	WA	
	n	%
<i>Business type</i>		
Dedicated liquor retailer	35	83
Venue	3	7
Supermarket	2	5
Catering	1	2
Other	1	2
Third party delivery service*	2	5
<i>Retail channels for alcohol sales</i>		
Online store	42	100
Physical licensed premises	32	76
Software application	11	26
<i>Payment methods</i>		
Credit card	42	100
Online payment service*	25	60
Dedicated buy now, pay later service**	8	19

*Third party services were also categorised under retail type

**e.g. PayPal; Google Pay; Apple Pay

***e.g. After Pay; ZIP, Latitude Pay

Liquor licensing

The liquor licence characteristics of retailers delivering to regional locations were similar to those delivering to Perth with around one third of licences being held in other states. The majority (n=29, 69%) of retailers operated under a WA liquor licence. One-third (n=12, 29%) of retailers operated under an interstate liquor licence, shipping alcohol products to WA from premises in NSW, Victoria or Queensland. The exception was one (n=1, 2%) licensee from South Australia, which can deliver alcohol products in under two hours to Perth from a WA premises. One (n=1, 2%) dedicated liquor retailer with an interstate liquor licence was also operating as a third-party agent for other licensees. One (n=1, 2%) retailer, a catering service, did not appear to hold a liquor licence but was delivering alcohol as a third-party agent for WA licensees.

Delivery locations and times

Less than one third of the retailers (n=12, 29%) provided explicit information about times when alcohol could be delivered. For some, information about delivery times was only available at the point when the retail transaction is made (point of sale) where available times could be chosen. Using the information available, it was determined that almost half of the retailers (n=18, 43%) offered same day alcohol deliveries to the Perth metropolitan area. Only one retailer (n=1, 2%) appeared to offer same day delivery in a regional location (Karratha) (Table 2).

Of the 18 retailers that offered same day delivery, nine (21%) stated that rapid delivery (under two hours) could be made within the Perth metropolitan area. The retailer offering same day delivery in Karratha who also delivered meals stated the delivery time as 'As soon as possible', however, because a timeframe was not explicit, this retailer was not categorised as offering rapid delivery.

Two retailers (5%) indicated that alcohol could be delivered after 10pm to Perth, with 11pm offered as the latest delivery time. One of these retailers could also deliver until 11pm to Northam, Bunbury and Albany; however, given same day deliveries are not offered in these locations, a late-night delivery would likely occur the following day.

Table 2. Liquor licence and delivery times of online alcohol retailers by delivery location (Audit 2)

Liquor licence and delivery times	Perth		Northam		Bunbury		Albany		Kalgoorlie		Geraldton		Carnarvon		Karratha		Broome		WA	
	n	%	n	%	n	%	n	%	n	%	n	%	n	%	n	%	n	%	n	%
<i>Liquor licence</i>																				
WA licence	28	68	21	64	21	64	21	64	17	63	21	64	17	59	15	58	15	60	29	69
Interstate licence	12	29	11	33	11	33	11	33	9	33	11	33	11	38	10	38	9	36	12	29
No liquor licence found	1	2	1	3	1	3	1	3	1	4	1	3	1	3	1	4	1	4	1	2
<i>Delivery times</i>																				
Next day+ delivery*	41	100	33	100	33	100	33	100	27	100	33	100	29	100	26	100	25	100	42	100
Same day delivery	17	41	-	-	-	-	-	-	-	-	-	-	-	-	1	4	-	-	18	43
Rapid delivery <2 hours	9	22	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	21
Rapid delivery <1 hour	9	22	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	21
Late-night delivery (after 10pm)	2	5	1	3	1	3	1	3	-	-	-	-	-	-	-	-	-	-	2	5
	41	100	33	100	33	100	33	100	27	100	33	100	29	100	26	100	25	100	42	100

*standard/next day+ does not guarantee a same day delivery and could occur the next day and beyond

Products and prices

Alcohol was the main product on offer for the majority of the retailers (n=39, 93%) (Table 3). Almost all offered a range of wine (n=39, 93%), beer (n=37, 88%), and spirits (n=37, 88%) products. Most retailers also offered other products for delivery including soft drinks/mixers/bottled water (n=21, 50%), snack foods (n=14, 33%) and glassware, bar tools/accessories (n=10, 24%). Four retailers offered tobacco and/or e-cigarette products (e.g., vape, e-liquid) (n=4, 10%). Alcohol was able to be purchased for delivery from two major supermarkets along with a full range of grocery items.

Table 3. Products offered by online alcohol retailers (Audit 2)

Products offered	WA	
	n	%
<i>Main product offered</i>		
Alcohol products	39	93
Other products	3	7
<i>Alcohol products offered</i>		
Wine	39	93
Beer	37	88
Spirits	37	88
Cider	33	79
Alcohol-branded zero alcohol products	33	79
Pre-mixed alcohol	30	71
<i>Other products offered</i>		
Soft drinks/mixers, bottled water	21	50
Snack foods	14	33
Glassware, bar tools/accessories	10	24
Gifts/gift hampers, flowers	9	21
Tobacco, e-cigarette products	4	10
Grocery items	3	7
Ready to eat meals	3	7
Alcohol-branded clothing/merchandise	3	7

The majority of retailers offered a broad range of alcohol products across a range of price points, from very low-priced products to products at high prices. Some retailers only sold higher priced products such as 'craft' beer, 'boutique' wine and 'small batch' spirits and did not offer cheap alcohol product ranges such as cask wine and 'cleanskin' products.

An examination of prices for alcohol products found that very cheap alcohol products can be purchased from around two thirds of retailers (n=29, 69%) (table 4). Among the cheapest products, wine could be purchased online for as cheaply as \$2.99 for a 750ml bottle, \$7.00 for a 2L cask, and \$9.99 for a 4L cask. Almost half of the retailers (n=18, 43%) audited offered 2L cask wine at \$20 and under and 4L cask wine at \$25 and under. A carton of at least 24 containers of beer could be purchased for under \$40 from one in three retailers (29%) and a 700ml bottle of vodka could be purchased for \$35 and under from one in six retailers (17%).

Free delivery was offered by over half of the retailers audited (n=22, 52%). Most of these required a minimum purchase to access free delivery (n=19, 45%), which ranged from \$50.00 - \$300.00,

and was commonly set at \$100.00 or \$150.00. When delivery was not free, the lowest costs for delivery ranged from \$2.00 to \$22.00. Some retailers had variable delivery costs depending on the time of day or timeframe for delivery as well as promotional offers and delivery was generally more costly in regional locations.

Table 4. Alcohol product and delivery prices for online alcohol retailers (Audit 2)

Cheapest alcohol products and delivery costs	WA	
	n	%
Wine - 750ml bottle \$10 and under	29	69
Wine - 750ml bottle \$5 and under	16	38
Wine - 2l cask \$20 and under	18	43
Wine - 4l cask \$25 and under	18	43
Beer - carton of min 24 containers \$40 and under	12	29
Vodka min 30% ABV - 700ml bottle \$35 and under	7	17
<i>Delivery options</i>		
Free delivery	22	52
Minimum order threshold for free delivery	20	48
Standard/next day+ delivery* \$10.00 and under	26	62
Same day delivery* \$10.00 and under	14	33

*Based on delivery costs to Perth

Retailer policies

The display of policies (Table 5) varied across the retailer websites and were most often found in lengthy terms and conditions or on ‘delivery information’ pages.

Identity and age verification at point of purchase

Most retailers (n=29, 79%) allowed users to make a ‘guest’ purchase, meaning information about the purchaser’s identity would not be registered with the retailer.

Over half of the retailers (n=22, 52%) did not ask users to report their age at any stage of the purchasing process. Two retailers (5%) asked customers to self-report their age upon entering the website, however, more commonly (n=19, 45%), the customer was asked about their age during the checkout process. This was done by way of entering a date of birth or use of a tick-box or button to confirm that they are over 18 years of age. None of the retailer websites had any processes or requirements for age verification using a form of identification.

Harm minimisation policies

Eleven retailers (26%) included an option to register for ‘self-exclusion’ from the service. To register for self-exclusion, customers would supply a name, email address, and phone number. For example, one retailer stated that:

“...if we see that you have ordered, we will cancel the order and refund you immediately.”

One in four retailers (n=11, 26%) displayed a policy regarding delivery to an intoxicated person. These policies were most commonly displayed in the terms and conditions/delivery terms or on the bottom of the webpage, for example:

“[Retailer] may refuse to provide liquor to a person who is intoxicated or disorderly.”

Around one third of retailers (n=13, 31%) applied quantity limits on alcohol purchases. Most of these involved a minimum purchase value/quantity (n=8, 19%), which ranged from \$20.00 to \$50.00 or six items. Some retailers (n=6, 14%) applied a maximum purchase limit, however all of these could be described as a bulk purchase comprising large quantities of multiple product types e.g., “60 bottles of wine, 5 cartons of beer, cider & pre-mix, and 12 bottles of spirit.”

Identity and age verification at delivery

Most retailers (n=39, 93%) displayed some form of policy or terms and conditions regarding delivery to a person under 18 years of age. Commonly, this was displayed as a warning on the bottom of the webpage, in the website terms and conditions or in the shipping/delivery information. For example:

“To be on the safe side I.D. is required if you look under 25 and this is enforced both in our retail stores and for home deliveries”

“We will not deliver Product to a person who is below the age of 18”

“WARNING. Under the Liquor Control Act 1988, it is an offence: to sell or supply liquor to a person under the age of 18 years on licenced or regulated premises; or for a person under the age of 18 years to purchase or attempt to purchase, liquor on licensed or regulated premises.”

Similarly, the requirement to show identification (ID) at delivery were most often displayed in the website terms or delivery terms e.g., “Please have your ID on hand when the courier arrives with your delivery.” However, a few retailer websites displayed this requirement at the point of sale e.g., “You must show ID to the driver on delivery.” or on the page displaying alcohol products e.g., “Proof of age will be required on delivery.”

None of the retailers asked for the name of a nominated person to accept the delivery on the purchaser’s behalf, unless the delivery was going to a different address than the biller’s address, for example as a gift.

Unattended deliveries

Nine retailers (21%) stated that no deliveries could be left unattended. Often these referred to Australia Post procedures that would involve the delivery driver leaving a card, and the parcel being taken to the post office for collection or for redelivery.

One third of retailers (n=14, 33%) stated that next day deliveries could be left unattended. Of these, some would not allow unattended delivery on the first order, or for a purchase made by a guest (not a registered user). One retailer (2%) stated that same day deliveries could be left unattended by instruction. Eight retailers required the customer to provide an ‘authority to leave’ by instruction when placing the order (n=8, 19%).

Table 5. Policies, terms and conditions of online alcohol retailers (Audit 2)

Policy or terms and conditions	WA	
	n	%
<i>Purchase limits</i>		
Minimum purchase (quantity or value)	8	19
Maximum purchase (bulk order quantity)	6	14
<i>Identity or age verification at point of purchase</i>		
Self-report age to enter website	1	2
Self-report age to complete purchase	19	45
Must be a registered user to purchase	13	31
Can check out as a guest	29	69
Age verification using ID	0	0
Food order required	0	0
Option to self-exclude from service	11	26
Policy regarding delivery to person under 18	39	93
Policy regarding delivery to intoxicated person	11	26
Request for nominated person to accept delivery	0	0
<i>Unattended deliveries</i>		
Any policy regarding unattended deliveries	28	67
Will leave same day delivery unattended	1	2
Will leave next day delivery unattended	14	33
Will not leave any deliveries unattended	9	21
Requires customer to state authority to leave	8	19

Higher risk online alcohol retailers

Thirty (n=30, 71%) retailers were categorised as higher risk in audit 2 due to their ability to deliver very cheap alcohol products to Perth and/or regional locations or to deliver any alcohol to Perth within 2 hours. The majority of the higher risk retailers were dedicated liquor retailers, venues or supermarkets holding a WA liquor licence (n= 23, 77%), and seven were dedicated liquor retailers with liquor licences held in New South Wales (n=5, 17%), South Australia (n=1, 3%), and Queensland (n=1, 3%).

The majority of higher risk retailers (n=28, 93%) could deliver very cheap alcohol products to Perth, eight of which could deliver in under two hours. One retailer could deliver a bottle of wine in under one hour, after 10pm, for \$11.00 (\$9.00 bottle of wine + \$2.00 delivery fee).

Most of the higher risk retailers (n=23, 77%) could deliver very cheap alcohol products to WA regional locations. None of the retailers explicitly offered a rapid delivery service to regional locations, however Retailer 27, a venue in Karratha also offered the delivery of meals, therefore it is likely deliveries could occur in a short timeframe.

In regard to other high-risk characteristics, delayed payment services such as Afterpay and Latitude were promoted by five (n=5, 17%) of the higher risk retailers and free or low-cost delivery (under \$10) was offered by most higher risk retailers (n=24, 80%). Some but not all retailers charged higher costs for delivery to regional locations than to Perth.

Harm minimisation characteristics were observed in retailer policies and delivery terms. None of the retailers had a process for age verification at the point of sale, however, all (n=30, 100%) had a policy or terms and conditions regarding service to a person under the age of 18 years was common. Eleven (n=11, 37%) retailers in the higher risk group offered an option to self-exclude from the service, however, only eight (n=8, 27%) were found to have a policy regarding delivery to an intoxicated person. Nine (n=9, 30%) of the higher risk retailers stated explicitly that alcohol deliveries would not be left unattended, however, none asked for a nominee to accept delivery on the purchaser's behalf.

Table 6. Higher risk online alcohol retailers

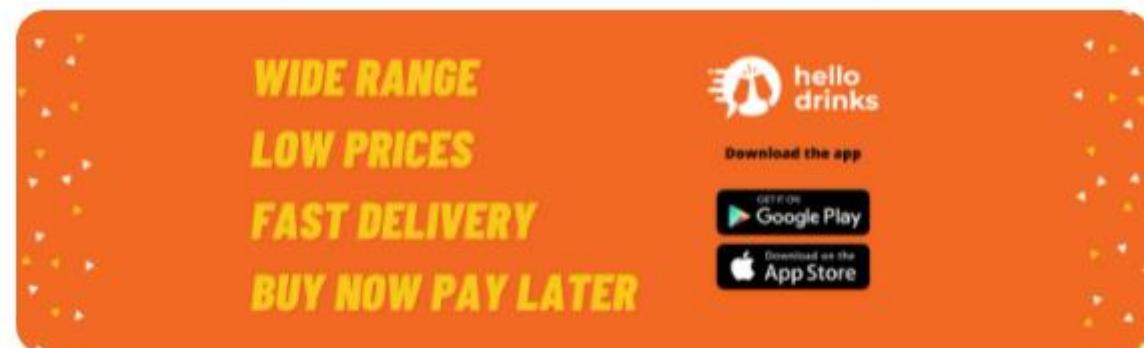
Retailer characteristics			High risk characteristics					Harm minimisation characteristics						
ID	Business type	Liquor licence jurisdiction	Delivers cheap alcohol to Perth	Delivers cheap alcohol to regions	Delivers any alcohol <2 hrs to Perth	Delivers after 10pm	Free or low-cost delivery (<=\$10)	Buy now, pay later	Offers self-exclusion	Policy or terms re intoxication	Policy or terms re under 18s	Age/ verification at purchase	Asks for nominee to accept delivery	No deliveries can be left unattended
R1	Liquor	WA	1	1			1				1			
R2	Liquor	WA	1		1		1		1	1	1			1
R3	Liquor	NSW	1	1					1	1	1			
R4	Liquor	NSW	1	1				1	1		1			
R5	Liquor	WA	1		1		1	1	1	1	1			1
R6	Liquor	WA	1	1	1		1	1	1	1	1			1
R7	Liquor	WA	1	1							1			
R8	Super	WA	1	1	1	1	1		1		1			1
R9	Liquor	WA	1	1			1				1			1
R10	Liquor	WA	1	1			1				1			
R11	Liquor	WA	1	1	1		1		1	1	1			
R12	Liquor	WA	1	1			1				1			
R13	Liquor	WA	1	1			1			1	1			
R14	Liquor	NSW	1	1				1			1			1
R15	Liquor	NSW	1	1			1	1	1	1	1			
R16	Liquor	SA			1	1	1		1	1	1			1
R17	Liquor	NSW	1	1					1		1			
R18	Liquor	WA	1				1				1			
R19	Liquor	WA	1				1				1			
R20	Liquor	WA	1	1			1				1			
R21	Liquor	Q	1	1					1		1			
R22	Liquor	WA	1	1			1			1	1			
R23	Liquor	WA	1	1			1				1			
R24	Liquor	WA	1	1			1				1			
R25	Liquor	WA	1		1		1				1			
R26	Venue	WA	1		1		1		1	1	1			1
R27	Venue	WA		1			1				1			
R28	Liquor	WA	1	1			1				1			
R29	Liquor	WA	1	1			1				1			
R30	Super	WA	1	1	1		1		1	1	1			
<i>n =</i>			28	23	9	2	24	5	11	8	30	0	0	9
<i>% of higher risk</i>			93	77	30	7	80	17	37	27	100	0	0	30

Promotional strategies

A range of promotional strategies were examined during audit 1, including how the retailer promoted the online sale and delivery of alcohol on Google, their own website, and social media pages. The terms found in the Google listings for the online alcohol retailers included product range, pricing and convenience e.g., 'great range', 'low prices', 'buy now', 'delivered cold in 30 minutes', 'orders over \$50 have free delivery', 'alcohol gifts', and 'delivery that's tailored to you'. At the time of audit 1, eight of the retailers (19%) also promoted their websites through paid advertisements on Google, which meant that they appeared earlier and more frequently in the search results for alcohol retailers.

Banners and tiles on the retailer's website homepage (Figure 1) were found to promote product ranges, price incentives, delivery features and competitions.

Figure 1: Homepage banner promotion



Price incentives took on different forms, and some retailers had multiple promotions running concurrently, including free delivery offers (Figure 2), multi-buy offers and sales (Figure 3). Customer loyalty programs offered incentives such as new member offers, member discounts (Figure 4), refer-a-friend deals, competitions, and the ability to earn points for further incentives.

Figure 2: Free delivery threshold



Figure 3: Sale



Figure 4: Loyalty program ‘Student Beans’

The screenshot shows the Liquorland website with a red header bar. On the left is the Liquorland logo. On the right are icons for search, a shopping cart with a notification of 1 item, and a menu. Below the header is a large image of three people smiling and holding glasses of white wine. To the right of the image is a promotional text: '\$10 off when you spend \$100 at Liquorland'. Below this, smaller text reads: 'Unlock \$10 off when you spend \$100 at Liquorland with Student Beans.' and 'Use our Liquorland student discount code at the checkout to enjoy \$10 off your order.' Further down, it says: 'For instant access to this discount simply register and verify your student status with Student Beans. It's free!' A red 'Login' button is below this. At the bottom right are links for 'See Terms & Conditions' and 'Support'. The 'StudentBeans' logo is also present.

Almost all retailers from audit 1 ($n=39$, 93%) and audit 2 ($n=40$, 95%) had social media pages including Facebook and Instagram showing promotional activity within the last 2 years. Less common social media channels used by retailers included Twitter, YouTube and LinkedIn; however, these channels were not explored in the current study. The types of alcohol promotions observed on Facebook and Instagram included product features; alcoholic drink recipes; price reductions; and competitions that require ‘follow and tag’ interactions (Figure 5). A search of the Facebook Ad Library during audit 1 found that eight (19%) of the retailers also ran paid advertisements for alcohol products during the audit 1 period.

Around one third of online alcohol retailers across both audits restricted people under 18 years of age from viewing their Facebook and Instagram pages through a technical protection measure known as age gating. This system restricts access to users aged under 18 years according to their own social media profile.

Other promotional strategies observed during audit 1 included liquor promotion to grocery shoppers at the online checkout (and via email) by a major supermarket website (Figure 6); out-of-home advertisements including on bus shelters and branded delivery vehicles; public relations strategies executed through alcohol industry news channels; and corporate social responsibility strategies including add-on donations to a mental health charity at the online point of sale, and unique fundraising pages (through the sale of alcohol) for schools and junior sporting clubs.

Figure 5: Social media promotion – Interactive, gift card giveaway



Figure 6: Promotion in online grocery store

The screenshot shows a promotional section in an online grocery store. It displays three recommended products:

- Nurofen Ibuprofen 200mg Tablets (24 tablets) - Add 1 for \$5.30
- Tanqueray Gin 1 Litre - Add 1 for \$64.00
- Nescafe Farmers Origins Africa Ristretto Capsules - Add 1 for \$6.20

At the bottom, there is a checkbox for "Don't show me this again" and a large "Continue to checkout" button.

Discussion

Strengths and limitations of the study

Prior to this study, little was known about the characteristics of businesses delivering alcohol in WA. It was not known what types of businesses and liquor licences offer this service, what products are available and how much they cost, at what times alcohol can be purchased and delivered, how the identity and age of customers is verified, how businesses promote their online sales channels, and what policies businesses have in place to minimise harm. The results from this study provide some insight into the business features of online alcohol retailers operating in WA.

This study provides a snapshot of the businesses offering the online sale and delivery of alcohol in WA both prior to and 6 months following the introduction of alcohol delivery regulations on 1 February 2022. A strength of this study was the number and variety of businesses included in the sample and the collection of data at two timepoints. By observing the characteristics of online alcohol retailers both prior to and following the introduction of regulations we were able to consider the impact of the regulations on how these businesses operate.

This audit only captured information from the business websites and did not collect data on online alcohol sales via software apps, which were available for some businesses. We did not record data for the type of delivery agent used by each service. We do not know about the range of people making alcohol deliveries in WA, which could at a minimum include retail assistants and dedicated delivery staff from liquor stores, courier service staff, and independent on-demand couriers.

We did not actually place orders via the retailer websites, so no orders for alcohol were paid for, and no deliveries were received. This meant that we didn't see any information that may be shown after a payment is made, or how delivery processes are carried out.

While we looked at each retailer website closely, the inconsistency in how information was presented on each website leaves open the possibility that some information may have been missed.

This study was not informed by alcohol sales and delivery data from alcohol retailers. To our knowledge, there is no information on alcohol deliveries in WA that is accessible for the purposes of public health research. Should such information become available, it could be used to inform the sample selection in future audits to ensure that the businesses conducting the most deliveries are examined.

Alcohol delivered cheap, fast and late

We found that alcohol could be purchased cheaply online for delivery to Perth and WA regions. The majority of retailers we examined offered a broad range of products and most offered cheap wine, beer and/or spirits with negligible delivery costs. Some cheap products (700ml bottle of vodka for under \$35 and carton of 24 beers for under \$40) were less common in the second audit, however, there was an increase in the number of retailers offering very cheap wine products (750ml bottles for under \$5 /under \$10, 2L cask for \$20 and under, 4L cask for \$25 and under) in the second audit.

There was also an increase in the number of retailers offering delivery in under two hours in the second audit ($n=9$, 22%), up from seven rapid delivery services (17%) in the first audit, prior to regulations. Given that rapid delivery of alcohol can prolong a drinking occasion, it is concerning that a greater number of retailers are offering rapid deliveries of alcohol. Even though there are still only a small number of retailers offering rapid alcohol deliveries, they may service large areas of Perth. This increase in rapid delivery has occurred in a short period of time and there are concerns that evolving business models will continue to increase the number of rapid delivery services operating both in Perth and in regional locations. Implementing a delay of two hours between order and delivery would reduce the risk that rapid delivery services will be used to continue heavy drinking occasions.

With the exception of a supermarket offering delivery until 11pm, we observed only one dedicated alcohol retailer offering rapid delivery to Perth after 10pm (until 10:30pm). There were an additional two services offering late night delivery in the first audit, however these included gift delivery services, which were excluded in audit 2. Specific information about delivery times was not available on all of the retailer websites, so it is possible that more retailers offered rapid and late-night deliveries than what was reported. The combined risks of cheap alcohol, delivered quickly and late at night when harms from alcohol peak, present significant concerns, particularly for people who drink at high risk levels and those around them (Foundation for Alcohol Research and Education, 2022; Huckle et al., 2021; A.M. Laslett et al., 2019; Mojica-Perez et al., 2019). Given late night deliveries do not appear to be common in WA at this point in time, restricting alcohol deliveries to 10pm would reduce the risk of evolving business models increasing their delivery hours.

We observed a range of delivery options including around half of retailers offering free delivery with a purchase threshold. Alcohol industry reports claim that shoppers spend more on alcohol online than they do in bricks and mortar stores (Allen, 2021). It has been suggested that restrictions may be warranted on purchase thresholds that incentivise customers to buy more alcohol to access free delivery (Colbert et al., 2022).

We observed alcohol retailers promoting delayed payment services referred to as 'buy now, pay later' such as Afterpay. Previous research suggests that delayed payment services increase the availability and accessibility of alcohol, which can impact people who may be vulnerable to combined harms from alcohol and financial stress (Colbert, Thornton, et al., 2020). Further research could examine how delayed payment services influence the perceived affordability of alcohol and purchasing behaviours where upfront costs are low.

Limited identity and age verification processes

At the time of this study, none of the retailers observed had processes in place for verifying the identity or age of the customer at the point of online sale. While observing the online ordering process, the researchers were able to enter a false name and birth date, neither of which were verified by any form of identity documentation. From June 2022, online alcohol retailers in NSW were required to conduct digital identity verification at the point of sale (NSW Government, 2021). Licensees now have until 31 May 2023 to be fully compliant with this regulation. At the time of the second audit, none of the $n=9$ retailers operating under a NSW liquor licence were conducting digital age verification for a WA delivery. If digital age verification technology were applied to both WA and interstate licensees, it would go some way to making the online supply channel more consistent with 'bricks and mortar' retail where customers are sighted and age verified at the point of sale as part of responsible service of alcohol obligations.

We observed retailer policies allowing for next day alcohol deliveries to be left unattended, presenting the risk that underage people will be able to access alcohol by ordering online the day before. Since conducting audit 1, prior to the regulations, we observed a reduction in the number of retailers explicitly stating the alcohol deliveries would not be left unattended under any terms. This may be a result of the new Liquor Delivery Regulations making it clear, the conditions under which alcohol deliveries can be left unattended, on a day after the order has been placed. Regardless of when the order is placed, the public health and safety concerns around unattended alcohol deliveries remain. Without sighting the person receiving the delivery, it is unlikely that an alcohol retailer can ensure that alcohol is not being delivered to an underage or intoxicated person. Extending the requirement that no alcohol deliveries are left unattended would support alcohol retailers to uphold their responsibility to prevent the supply of alcohol to underage people and people who are intoxicated.

Promotion of the online alcohol marketplace

We observed a range of promotions for buying alcohol online across the retailer websites and other marketing channels. Consistent with other work (Colbert, Thornton, et al., 2020), these included pricing incentives such as product discounts, sales, multi-buy offers, and offers for free delivery. Other promotions included product features, competitions, loyalty programs, and humorous or visually appealing content aimed at creating experiences around drinking occasions and traditions. Our observations of digital promotions suggest the need to further investigate apps and the nature of promotions targeting app users to understand how this might influence purchasing behaviours.

It is common for businesses to use their customer's data to develop targeted promotions and, consistent with other studies (Colbert, Thornton, et al., 2020), we received emails and text messages with personalised, time-limited offers to the email address and mobile number used to examine the checkout process at the online point of sale. These messages often included product suggestions based on the purchases we added to the shopping cart, or reminders to buy what was left waiting in our cart.

We observed an absence of age gating measures on many of the Facebook and Instagram social media pages of online alcohol retailers, despite the self-regulatory Alcohol Beverages Advertising Code (ABAC) stating that marketers "must utilise Available Age Restriction Controls to exclude Minors from viewing its Marketing Communications." Whilst none of the other ABAC standards were examined, the findings are consistent with earlier research, which indicates a need for stronger regulatory controls for alcohol marketing to prevent young people's exposure to online alcohol marketing (Pierce et al., 2021). Exposure to alcohol marketing on social media adds to the risk that young people will access online alcohol retailers, which are lacking in robust age verification processes both at the point of sale and delivery.

We observed alcohol products to be well integrated on two major supermarket websites. Here 'Liquor' comprised a main product category alongside grocery categories such as 'Fruit & Vegetables' and 'Baby', and alcohol could be purchased in the same shopping cart and transaction as everyday grocery items. Alcohol products featured in spontaneous suggestions for add on purchases at checkout, food and alcohol 'pairing', and in promotional emails from the supermarkets. The lack of separation between alcohol and grocery items in the online supermarkets is different to physical supermarkets in WA where liquor stores are somewhat separated from the display of grocery products. Integrating the display and sale of alcohol with everyday necessities such as groceries and household items may suggest that alcohol is an

ordinary commodity rather than a harmful drug that should be treated with caution (Babor, 2010). Furthermore, a shift to online grocery shopping during the COVID-19 pandemic may facilitate increased exposure to digital alcohol marketing from supermarkets.

Inconsistent liquor licensing and retailer policies

We found that around one third of online alcohol retailers delivering alcohol to Perth and regional WA, hold an interstate liquor licence. The higher risk retailers offering low cost, rapid, and late-night alcohol deliveries included national businesses operating under WA Liquor Store licences; and interstate licensees that can deliver cheap alcohol from interstate, or from local liquor stores in under two hours. Differences were observed in the characteristics of liquor licencing between audit 1 and 2. These were mainly due to the exclusion of websites for gift delivery businesses operating under an exemption to the Liquor Control Act in audit 2. Additionally, audit 2 examined retailers offering delivery to regional locations finding that around a third of retailers delivering to regional locations operated with an interstate licence. This may present issues around the awareness of liquor regulations and takeaway alcohol restrictions in regional locations such as Kalgoorlie, Karratha and Broome.

Whilst this report provides some insight, it is unknown how many licensees are operating an online sales and delivery service in WA. This is because some licensees are able to deliver alcohol by default under their current unrestricted licence (i.e. Liquor Store, Tavern) and are not required to report online sales or deliveries to the licensing authority. Given that liquor delivery regulations are changing, and are different in each state, there should be greater clarity on how regulations are communicated, and how compliance is monitored. Of interest, the Northern Territory (NT) requires that interstate retailers selling into the NT must also hold an NT liquor licence. NSW has also adopted the requirement that businesses making same day deliveries in NSW hold a NSW liquor licence and report same day alcohol deliveries to the licensing authority periodically. WA could also benefit from similar requirements.

Other jurisdictions have seen a growing trend for rapid alcohol deliveries by food delivery services, yet this was not the case in WA at the time of the audits. The availability of rapid and late-night deliveries could increase if third party delivery agents become more common, like in other jurisdictions. Given that multiple food delivery services are operational in WA, it is timely to consider how the regulations can be adequately applied across all alcohol deliveries including third party on-demand delivery agents.

Seven (17%) of the retailers we observed in our first audit did not hold a liquor licence and were likely operating under an exemption to the Liquor Control Act 1988. Given the blurry line between gift services delivering alcohol and alcohol retailers delivering gifts, a consistent regulatory approach is needed, particularly in respect to age verification, delivering alcohol to people who are intoxicated, and leaving deliveries unattended.

None of the retailers in the second audit asked for the name of a nominee to accept delivery on behalf of the purchaser. Without this function, it may be difficult for retailers to comply with regulations stating that same day deliveries of liquor are not left with a person unless the person is the purchaser or the purchaser's nominee. Similarly, whilst the regulations require that liquor is not left unattended unless the purchaser authorises the liquor to be left unattended at the premises, only eight (19%) retailer websites provided a function for customers to provide an authority to leave.

Despite the availability of rapid deliveries to Perth and deliveries of cheap alcohol in regional locations, the current study found few examples of online alcohol retailers clearly reporting a policy

in respect to delivering alcohol to a person who is intoxicated. Whilst Responsible Service of Alcohol (RSA) is now a requirement for all same day alcohol delivery drivers, there is currently no requirement for next day deliveries, which likely comprise the majority of deliveries to regional locations. Online alcohol retailers should at a minimum, have a policy that details how the business will manage staff training and the refusal of service to intoxicated people at the point of delivery regardless of whether it is a same day or next day delivery.

Conclusion

The purpose of this audit was to observe the characteristics of online alcohol retailers both prior to and following the introduction of the WA Liquor Delivery Regulations. Despite the introduction of regulations, concerns remain about how some online alcohol retailers are operating in WA. We observed businesses operating in a manner that combined the risks of delivering cheap alcohol quickly, and late at night. Age verification systems were absent at the online point of sale and the policies and terms relating to checking ID, unattended deliveries and the refusal of service were inconsistent. The promotions for alcohol delivery services feature strongly online and on social media, with a focus on free or fast delivery, price promotions and buy now, pay later deals.

Whilst this study provides valuable information, the online alcohol marketplace is continuing to expand. This means that there is an important window of opportunity through the review of the WA Liquor Delivery Regulations to ensure that there are adequate community protections in place both now and as the online marketplace evolves.

This study highlights several areas where regulatory measures can mitigate the high-risk aspects of alcohol delivery. These include limiting the availability of rapid and late-night deliveries, ensuring that alcohol is not purchased online by underage people and prohibiting any alcohol delivery from being left unattended. Applying further sensible measures would make consistent what is already operational by some online alcohol retailers and ensure that the responsible service of alcohol is upheld whether alcohol is sold and supplied at a venue, liquor store or through an online sale for delivery.

To enable further monitoring of the online alcohol marketplace in WA, researchers would benefit from timely access to sales and delivery data. This data could be used to inform the sample selection in future audits to ensure that the businesses conducting the most deliveries are examined.

References

- Alcohol Change VIC. (n.d.). *Online sale and home delivery of alcohol: measures to prevent harm in Victorian communities*. Retrieved March 24, 2022, from <https://www.alcoholchangevic.org.au/our-work/position-statements/online-sale-and-home-delivery-of-alcohol-measures-to-prevent-harm-in-victorian-communities>
- Allen, B. (2021, September 16). *Liquor shoppers are spending more online*. The Shout National Liquor News.
- Babor, T. F. (2010). Alcohol: No ordinary commodity - A summary of the second edition. *Addiction*, 105(5), 769–779. <https://doi.org/10.1111/j.1360-0443.2010.02945.x>
- Carah, N., & Brownbill, A. (2022, April 11). *Tracking how alcohol companies target young people online*. InSight Plus Medical Journal of Australia.
- Colbert, S., Thornton, L., & Richmond, R. (2020). Content analysis of websites selling alcohol online in Australia. *Drug and Alcohol Review*, 39(2). <https://doi.org/10.1111/dar.13025>
- Colbert, S., Wilkinson, C., Feng, X., Thornton, L., & Richmond, R. (2022). You've got mail: Drinks are on sale! A study to assess volume and content of direct marketing received from online alcohol retailers in Australia. *International Journal of Drug Policy*, 105, 103705. <https://doi.org/https://doi.org/10.1016/j.drugpo.2022.103705>
- Fletcher, L. A., Toomey, T. L., Wagenaar, A. C., Short, B., & Willenbring, M. L. (2000). Alcohol home delivery services: A source of alcohol for underage drinkers. *Journal of Studies on Alcohol*, 61(1). <https://doi.org/10.15288/jsa.2000.61.81>
- Foundation for Alcohol Research and Education. (n.d.). *Online sales and delivery* . Retrieved March 24, 2022, from <https://fare.org.au/policy/online-sales-and-delivery/>
- Foundation for Alcohol Research and Education. (2022). *Gut-wrenching sound of alcohol delivery in an abusive relationship*. <https://fare.org.au/gut-wrenching-sound-of-alcohol-delivery-in-an-abusive-relationship/>
- Government of Western Australia. (2011). *Exemptions to the Liquor Control Act 1988 Policy*. <https://www.dlgsc.wa.gov.au/department/publications/publication/exemptions-to-the-liquor-control-act-1988-policy>
- Government of Western Australia. (2022a). *Find a Licence*. Racing, Gaming and Liquor . <https://portal.dlgsc.wa.gov.au/forms/fr/search/findalicense/new>
- Government of Western Australia. (2022b). *Liquor Control Regulations 1989*. https://www.legislation.wa.gov.au/legislation/statutes.nsf/main_mrttitle_1735_homepage.html
- Griswold, M. G., Fullman, N., Hawley, C., Arian, N., Zimsen, S. R. M., Tyneson, H. D., Venkateswaran, V., Tapp, A. D., Forouzanfar, M. H., Salama, J. S., Abate, K. H., Abate, D., Abay, S. M., Abbafati, C., Abdulkader, R. S., Abebe, Z., Aboyans, V., Abrar, M. M., Acharya, P., ... Gakidou, E. (2018). Alcohol use and burden for 195 countries and territories, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016. *The Lancet*, 392(10152), 1015–1035. [https://doi.org/10.1016/S0140-6736\(18\)31310-2](https://doi.org/10.1016/S0140-6736(18)31310-2)

- Gupta, H., Lam, T., Pettigrew, S., & Tait, R. J. (2018). The association between exposure to social media alcohol marketing and youth alcohol use behaviors in India and Australia. *BMC Public Health*, 18(1). <https://doi.org/10.1186/s12889-018-5645-9>
- Huckle, T., Parker, K., Romeo, J. S., & Casswell, S. (2021). Online alcohol delivery is associated with heavier drinking during the first New Zealand COVID-19 pandemic restrictions. *Drug and Alcohol Review*, 40(5), 826–834. <https://doi.org/10.1111/dar.13222>
- IBISWorld. (2022). *Online Beer, Wine and Liquor Sales in Australia - Market Reserach Report*. <https://www.ibisworld.com/au/industry/online-beer-wine-liquor-sales/4087/>
- International Wine and Spirits Research. (2021). *Press Release - Led by the US, Beverage Alcohol Ecommerce Value Expected to Grow +66% Across Key Markets 2020-2025*. www.theiwsr.com.
- Jongenelis, M. I., Pierce, H., Keric, D., Stafford, J., Jongenelis, G., & Pettigrew, S. (2021). Are Australian regulatory codes adequate in scope to protect youth from alcohol advertising? *Health Promotion Journal of Australia*, 32(S2), 212–217. <https://doi.org/10.1002/hpja.410>
- Laslett, A., Mugavin, J., Jiang, H., Manton, E., Callinan, S., MacLean, S., & Room, R. (2015). *The hidden harm: Alcohol's impact on children and families*.
- Laslett, A.-M., Room, R., Waleewong, O., Stanesby, O., Callinan, S. (Of L. T. U., & World Health Organization. Department of Mental Health and Substance Abuse. (2019). *Harm to others from drinking : patterns in nine societies*.
- MacLean, S., Room, R., Cook, M., Mugavin, J., & Callinan, S. (2022). Affordances of home drinking in accounts from light and heavy drinkers. *Social Science and Medicine*, 296. <https://doi.org/10.1016/j.socscimed.2022.114712>
- Meta. (n.d.). *Facebook Ad Library*. Facebook. Retrieved June 6, 2022, from https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=AU&media_type=all
- Mojica-Perez, Y., Callinan, S., & Livingston, M. (2019). *ALCOHOL HOME DELIVERY SERVICES: AN INVESTIGATION OF USE AND RISK*.
- Noel, J. K., Babor, T. F., & Robaina, K. (2017). Industry self-regulation of alcohol marketing: a systematic review of content and exposure research. In *Addiction* (Vol. 112, pp. 28–50). Blackwell Publishing Ltd. <https://doi.org/10.1111/add.13410>
- NSW Government. (2021). *Alcohol delivery laws*. <https://www.liquorandgaming.nsw.gov.au/resources/alcohol-delivery-laws>
- Pierce, H., Vidler, A.-C., Stafford, J., & Keric, D. (2021). Alcohol brands' use of age-restriction controls on Facebook and Instagram in Australia. *Public Health Research & Practice*. <https://doi.org/10.17061/phrp31232109>
- Sargent, J. D., & Babor, T. F. (2020). The Relationship Between Exposure to Alcohol Marketing and Underage Drinking Is Causal. *Journal of Studies on Alcohol and Drugs. Supplement*, Sup 19(Suppl 19), 113–124. <https://doi.org/10.15288/jsads.2020.s19.113>

Sargent, J. D., Cukier, S., & Babor, T. F. H. (n.d.). *Alcohol Marketing and Youth Drinking: Is There a Causal Relationship, and Why Does It Matter?* <http://rayyan.qcri.org>

Thompson, A., & Ward, M. (2021, October 14). *Jimmy Brings alcohol delivery investigated over Sydney man's death.* The Sydney Morning Herald.

van Hoof, J. J., van den Wildenberg, E., & de Brujin, D. (2014). Compliance With Legal Age Restrictions on Adolescent Alcohol Sales for Alcohol Home Delivery Services (AHDS). *Journal of Child and Adolescent Substance Abuse*, 23(6). <https://doi.org/10.1080/1067828X.2012.730119>

Williams, R. S., & Ribisl, K. M. (2012). Internet alcohol sales to minors. *Archives of Pediatrics and Adolescent Medicine*, 166(9), 808–813. <https://doi.org/10.1001/archpediatrics.2012.265>

Appendices

Appendix 1: Audit tools

Audit 2 Tool

Fields	Codes
<i>Business operation</i>	
Business name	Name
Website URL	URL
Social media pages	Handles
Are all social media pages age-gated?	Y/N
Does the service have an app to support sales/delivery?	Name
Does the business appear to have a bricks & mortar store?	Y/N
Retail type (what is the business selling?)	Short answer
Licence type (as per DLSGC website)	WA type / Interstate / None
Can you purchase alcohol direct from the website?	Y/N
Does the service sell/deliver alcohol on behalf of other businesses?	Y/N
What payment options are available?	All types that apply
Are delayed payment services (BNPL) promoted? i.e. logos, banners, T&Cs	All types that apply
<i>Product & price</i>	
What types of alcohol products can be purchased?	All types that apply
Can a carton of 24 beers be purchased for \$40 or under?	Y/N
Can a 750ML bottle of wine be purchased for \$5 or under?	Y/N
Can a 750ml bottle of wine be purchased for \$10 or under?	Y/N
Can a 2L cask of wine be purchased for \$20 or under?	Y/N
Can a 4L cask of wine be purchased for \$30 or under?	Y/N
Can a 700ML bottle of vodka (30%ABV+) be purchased for \$35 or under?	Y/N
What types of other products can be purchased?	All types that apply
Is alcohol the main product on offer or ancillary to other products?	Main / Ancillary
<i>RSA & harm minimisation</i>	
Is there an option to self-exclude from the service?	Y/N
Are there any quantity limits on alcohol purchases?	Y/N
If yes, what are the limits? (min or max)	Min detail / Max detail / Max-bulk
Is there a policy or terms and conditions regarding delivery to an intoxicated person?	Y/N
If YES, describe the policy or T&Cs	Short answer
Do you need to order food as part of the order?	Y/N
<i>Age verification – point of sale</i>	
Does the website require the purchaser to self-report their age when entering the website?	No / confirm 18+ / DOB
Are you required to be a registered user, or create an account to make a purchase?	Y/N
Are you required to enter your age or confirm over 18 when processing a purchase or starting an account?	Y/N

Is age verification (proof of 18+) required to make a purchase?	Y/N
If YES, describe the method for age verification	Short answer

Age verification – delivery

Is there a policy or terms and conditions regarding delivery to a person under 18 years?	Y/N
Describe the policy or T&Cs	Short answer
Does the website specify that age verification (proof of 18+) is required to accept a SAME DAY delivery?	Y/N
Does the website specify that age verification (proof of 18+) is required to accept a next day+ delivery?	Y/N
Does the website ask for a nominated person to accept delivery if the purchaser is unable to receive the delivery?	Y/N
Describe any policy or T&Cs that relates to leaving deliveries unattended	Y/N
Does the website state that same day deliveries can be left unattended?	Y/N
Does the website state that next day deliveries can be left unattended?	Y/N
Does the website state that NO DELIVERIES can be left unattended?	Y/N
Does the website have an authority to leave function during the checkout process?	Y/N

Delivery times

Are the times for delivery shown on the website?	Y/N
If YES, what are the total hours for delivery? (i.e. 9am-10pm)	Range of hours
Can a delivery be made to... Perth, Northam, Bunbury, Albany, Kalgoorlie, Geraldton, Carnarvon, Karratha, Broome?	Y/N for each regional centre
... on the same day?	Y/N for each regional centre
... in under 2 hours?	Y/N for each regional centre
... in under 1 hour?	Y/N for each regional centre
... after 10pm?	Y/N for each regional centre

Delivery costs

Is free delivery offered?	Y/N
If YES, at what purchase amount is free delivery offered?	\$X
When delivery is not free, what is the lowest cost for same day delivery?	\$X
When delivery is not free, what is the lowest cost for next day + delivery?	\$X
Are flexible delivery options offered? (i.e. choose a time)	Y/N
If YES, what is the cost for a flexible delivery option?	\$X

Audit 1 Tool

Fields	Codes
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Business operation

Business name	Name
Website URL	URL
Social media pages	Handles
Do the social media pages have age-gating?	Y/N
Does the service have an app to support sales/delivery?	Name
Does the business appear to have a bricks & mortar store?	Y/N
Retail type (what is the business selling?)	Short answer
Licence type (as per DLSGC website)	WA type / Interstate / None

Can you purchase alcohol direct from the website?	Y/N
Does the service sell/deliver alcohol on behalf of other businesses?	Y/N
What payment options are available?	All types that apply
Product & price	
What types of alcohol products can be purchased?	All types that apply
What is the cheapest available for...a carton of 24 beers	Product + price
... 750mL bottle of wine	Product + price
... 2L/4L cask of wine	Product + price
... 700mL bottle of vodka	Product + price
What types of other products can be purchased?	All types that apply
Is alcohol the main product on offer or ancillary to other products?	Main / Ancillary
RSA & harm minimisation	
Is there an option to self-exclude from the service?	Y/N
Are there any quantity limits on alcohol purchases?	Y/N
If yes, what are the limits? (min or max)	Short answer
Is there a policy or terms and conditions regarding delivery to an intoxicated person?	Y/N
If YES, describe the policy or T&Cs	Short answer
Do you need to order food as part of the order?	Y/N
Age verification – point of sale	
Are you required to be a registered user, or create an account to make a purchase?	Y/N
Does the website require the purchaser to self-report their age?	No / confirm 18+ / DOB
Does this appear on the homepage?	Y/N
Does this appear when processing a purchase?	Y/N
Is age verification (proof of 18+) required to make a purchase?	Y/N
If YES, describe the method for age verification	Short answer
Age verification – delivery	
Is there a policy or terms and conditions regarding delivery to a person under 18 years?	Y/N
Describe the policy or T&Cs	Short answer
Does the website state that age verification (proof of 18+) is required to accept a same day delivery?	Y/N
Does the website state that age verification (proof of 18+) is required to accept a next day+ delivery?	Y/N
How is the requirement for ID referred to?	Short answer
Does the website ask for the name of a nominated person to accept delivery on the purchaser's behalf?	Y/N
Is this only for same day deliveries	Y/N
Is this only for deliveries going to another address?	Y/N
Does the website state any policy or terms and conditions where deliveries can be left unattended?	Y/N
If YES, describe the policy or T&Cs	Short answer
Delivery times	
Are the times for delivery shown on the website?	Y/N
If YES, what are the total hours for delivery? (i.e. 9am-10pm)	Range of hours
Can a delivery be made to Perth metro on the same day?	Y/N

... in under 2 hours?	Y/N
... in under 1 hour?	Y/N
... after 10pm?	Y/N
<i>Delivery costs</i>	
Is free delivery offered?	Y/N
If YES, at what purchase amount is free delivery offered?	\$X
If NO, what is the cost for same day delivery?	\$X
If NO, what is the cost for standard next day+ delivery?	\$X
Are flexible delivery options offered? (i.e. choose a time)	Y/N
If YES, what is the cost for a flexible delivery option?	\$X
<i>Promotional strategies</i>	
How is the online sale and delivery service promoted on Google?	Short answer
How is the online sale and delivery service promoted on the business' homepage?	Short answer
How is the online sale and delivery service promoted on social media?	Short answer
What pricing incentives are specific to the online sale and delivery service?	Short answer
What loyalty incentives are specific to the online sale and delivery service?	Short answer
What other promotional strategies were observed during the audit period?	Short answer

Appendix II - Exclusions

Audit 2 Exclusions

Business name	Business type	Reason for exclusion
Bloomin Boxes	Gift	Operating under an exemption to the Liquor Control Act
Brew Crates	Gift	Operating under an exemption to the Liquor Control Act
Due South	Venue	Online order for alcohol delivery could not be made
Hylba Tavern	Venue	Online order for alcohol delivery could not be made
IGA Liquor	Supermarket	Online order for alcohol delivery could not be made
The Roey	Venue	Online order for alcohol delivery could not be made
Zanders	Venue	Online order for alcohol delivery could not be made
ALDI	Supermarket	Online order for alcohol delivery could not be made
Choc a Box	Gift	Operating under an exemption to the Liquor Control Act
Choccy Licious Bouquets	Gift	Operating under an exemption to the Liquor Control Act
Dial a Hamper	Gift	Operating under an exemption to the Liquor Control Act
Edible Blooms	Gift	Operating under an exemption to the Liquor Control Act
The Bottle-O	Liquor	Online order for alcohol delivery could not be made
Frangipani Floral Studio	Gift	Operating under an exemption to the Liquor Control Act
Freemasons Hotel	Venue	Online order for alcohol delivery could not be made
Geraldton Floral Studio	Gift	Operating under an exemption to the Liquor Control Act
Gift Delivery Australia	Gift	Operating under an exemption to the Liquor Control Act
Good Grocer Karratha	Supermarket	Online order for alcohol delivery could not be made
Go People	Delivery agent	Online order for alcohol delivery could not be made
Thirsty Camel Karratha	Liquor	Online order for alcohol delivery could not be made
Hampers by Design	Gift	Operating under an exemption to the Liquor Control Act
Air Tasker	Other	Online order for alcohol delivery could not be made
Al's Liquor Store Carnarvon	Liquor	Online order for alcohol delivery could not be made
Door Dash	Delivery app	Online order for alcohol delivery could not be made
Free Spirit Drink Co	ZAP store	Only sells zero alcohol products
Funky Balloons	Gift	Operating under an exemption to the Liquor Control Act
Karratha Flowers	Gift	Operating under an exemption to the Liquor Control Act
Liquor Barons Carlisle	Liquor	Online order for alcohol delivery could not be made

Liquor Barons Perth	Liquor	Online order for alcohol delivery could not be made
Liquoroo	Liquor	Online order for alcohol delivery could not be made
Mane Liquor	Liquor	Online order for alcohol delivery could not be made
Menulog	Delivery app	Online order for alcohol delivery could not be made
Perth Alcohol Delivery Service	Delivery agent	Online order for alcohol delivery could not be made
Relish Gourmet	Gift	Operating under an exemption to the Liquor Control Act
Republic of Fremantle	Liquor	Online order for alcohol delivery could not be made
St Annes Florist	Gift	Operating under an exemption to the Liquor Control Act
The Flower House Bunbury	Gift	Operating under an exemption to the Liquor Control Act
Thirsty Camel	Liquor	Online order for alcohol delivery could not be made
Tipple	Liquor	Online order for alcohol delivery could not be made
Uber Eats	Delivery app	Online order for alcohol delivery could not be made
Wholly Local	Gift	Operating under an exemption to the Liquor Control Act
Yummy Box	Gift	Operating under an exemption to the Liquor Control Act

Audit 1 Exclusions

Business name	Business type	Reason for exclusion
Aldi	Supermarket	Online order for alcohol delivery could not be made
Bottlemart	Liquor	Audit completed for Boab Tavern (Bottlemart)
Cellarmasters	Liquor	Delivery operated by Dan Murphy's (included in audit)
Go People	Delivery agent	Online order for alcohol delivery could not be made
Liquor Barons	Liquor	Online order for alcohol delivery could not be made
Liquor Legends	Liquor	Online order for alcohol delivery could not be made
Liquor Traders Australia	Liquor	Wholesale only
Matso's	Liquor	Online order for alcohol delivery could not be made
Shorty's Liquor	Liquor	Online order for alcohol delivery could not be made
Thirsty Camel	Liquor	Online order for alcohol delivery could not be made
Tipple	Delivery app	Online order for alcohol delivery could not be made
Uber Eats	Delivery app	Online order for alcohol delivery could not be made
Perth alcohol delivery service after hours	Facebook page	Page not active since 2019

Appendix III - Inclusions

Audit 2 Inclusions

Business name	URL	Business type	LL (type or other state)
Aussie Liquor Discounts	https://www.aussieliquor.com.au/viewStory/Delivery	Liquor	Liquor Store
Beer Farm	https://www.beerfarm.com.au/collections/all-beer/products/hop-experiment-dipa-series-exp-2	Liquor	Tavern
Boab Tavern	https://boabtavern.com.au/bottle-shop/	Liquor	Tavern
Booze Bud	https://www.boozebud.com/alcohol-delivery-perth	Liquor	New South Wales
Booze It	https://www.boozeit.com.au/	Liquor	New South Wales
Boston Brewing	http://bostonbrewing.com.au/	Liquor	Tavern
BWS	https://bws.com.au/help/delivery-wa	Liquor	Liquor Store, Tavern
Cellarbrations Beeliar	https://www.cellarbrationsbeeliar.com/page/express-delivery/	Liquor	Liquor Store
Cellarbrations Subiaco	https://www.cellarbrationssubiaco.com.au/	Liquor	Liquor Store
Cellars	https://cellars.com.au/listing/cellarbrations-superstore-at-tambrey-tavern-lot-4227-tambrey-drive-karratha-wa-6714/	Liquor	New South Wales
Coles	https://shop.coles.com.au/a/national/content/orders-with-alcohol-and-tobacco	Supermarket	Liquor store
Con's Liquor	https://consliquor.com/	Liquor	Liquor Store
Copper & Oak	https://www.copperandoak.com.au/	Liquor	Liquor Store
Dan Murphys	https://www.danmurphys.com.au/shop/alcohol-delivery-perth-same-day	Liquor	Liquor Store
De Vine Cellars	https://devinecellars.com.au/delivery/	Liquor	Liquor Store
Eat First	https://www.eatfirst.com.au	Catering	None
First Choice Liquor	https://www.firstchoiceliquor.com.au	Liquor	Liquor Store
Funky Duck Vinyl	https://funkydockvinyl.com/booze-18/local-beer/matsos-mango-beer-6-bottles/	Other	Victoria
Good Drop	https://goooddrop.com.au/	Liquor	New South Wales
Great Southern Distilling Co	https://distillery.com.au/pages/great-southern-distilling-company	Liquor	Tavern, Producers
Hello Drinks	https://helldrinks.com.au/pages/alcohol-delivery-perth	Liquor	New South Wales
Jimmy Brings	https://jimmybrings.com.au/perth/	Liquor	South Australia
Jim's Cellars	https://jimscellars.com.au/pages/delivery-information	Liquor	New South Wales
Kemenys	https://www.kemenys.com/go.jsp#	Liquor	New South Wales

Laneway Liquor	https://www.lanewayliquor.com/pages/shipping-and-returns	Liquor	New South Wales
Liberty Liquors	https://www.libertyliquors.com.au/	Liquor	Liquor Store
Liquor Barons Connolly	https://www.liquorbaronsconnolly.com.au/	Liquor	Liquor Store
Liquor Home Delivery	https://www.liquorhomedelivery.com.au/	Liquor	Liquor Store
Liquor Legends	https://liquorlegends.com.au/	Liquor	Queensland
Liquorland	https://www.liquorland.com.au/ordering/delivery	Liquor	Liquor Store
Liquor Shed	https://www.liquorshed.com.au/	Liquor	Liquor Store
Mojos Restaurant	https://www.mojosrestaurant.com.au/	Venue	Tavern
Old Bridge Cellars	https://www.oldbridge.com.au/	Liquor	Liquor Store
Partners in Wine	https://partnersinwine.com.au/	Liquor	Special Facility
Stoneville Liquor	https://www.stonevilleliquor.com.au/	Liquor	Liquor Store
The Freo Doctor	https://thefreodoctor.com/	Liquor	Liquor Store
The Sixty 30 (Bottlemart)	https://www.sixty30.com.au/	Venue	Tavern
The Tav	http://tavtakeaway.online/	Venue	Tavern
The Wine Collective	https://www.thewinecollective.com.au/collections/wine-delivery-perth	Liquor	New South Wales
Vintage Cellars	https://www.vintagecellars.com.au/	Liquor	Liquor Store
Wine Cow	https://www.winecow.com.au/pages/terms-and-conditions-of-use	Liquor	Wholesale
Woolworths	https://www.woolworths.com.au/shop/browse/liquor/liquor-specials	Supermarket	Liquor store

Audit 1 Inclusions

Business name	URL	Business type	LL (type or other state)
Amazon	https://www.amazon.com.au/b?ie=UTF8&node=5555308051	Multi-type	New South Wales
Aussie Liquor Discounts	https://www.aussieliquor.com.au/	Liquor	Liquor Store
Bloomin Boxes	https://bloominboxes.com.au/flower-and-bouquet-delivery-perth/	Gift service	Not stated*
Boab Tavern	https://boabtavern.com.au/bottle-shop/	Liquor	Tavern
Boatshed Market	https://www.boatshedmarket.com.au/delivery-zones-fees	Liquor	Liquor Store
Booze Bud	https://www.boozebud.com/alcohol-delivery-perth	Liquor	New South Wales
Booze It	https://www.boozeit.com.au/	Liquor	New South Wales
Bucket Boys	https://www.bucketboys.com.au/	Liquor	New South Wales
BWS	https://bws.com.au/help/delivery-wa	Liquor	Tavern, Liquor Store
Cellarbrations	https://www.cellarbrationssubiaco.com.au/	Liquor	Liquor Store

Coles	https://shopcoles.com.au/a/national/home	Supermarket	Liquor Store
Copper and Oak	https://www.copperandoak.com.au/	Liquor	Liquor Store
Craft Cartel	https://craftcartel.com.au/	Liquor	New South Wales
Dan Murphy's	https://www.danmurphys.com.au/	Liquor	Liquor Store
Dial a Hamper	https://dialahamper.com.au/wine-a-champagne-alcohol	Gift service	Not stated*
Eat First (De Vine Cellars)	https://www.eatfirst.com/en-AU/suppliers/de-vine-cellars/Beers-Wines-and-Champagnes	Catering	3rd party**
First Choice Liquor	https://www.firstchoiceliqur.com.au/ordering/delivery	Liquor	Liquor Store
Flaschengeist	https://flaschengeist.com.au/	Gift service	New South Wales
Gangemis Fine Wines & Food	https://www.gangemis.com.au/	Liquor	Liquor Store
Gift Baskets Galore	https://giftbasketsgalore.com.au/	Gift service	Not stated*
Good Drop	https://goooddrop.com.au/	Liquor	New South Wales
Gourmet Basket	https://gourmetbasket.com.au/favourite/cocktails-spirits/	Gift service	Not stated*
Hampers by Design	https://www.hampersbydesign.com.au/product-category/wine-alcohol-hampers/	Gift service	Not stated*
Hello Drinks	https://helldrinks.com.au/pages/alcohol-delivery-perth	Liquor	New South Wales
Jim's Cellars	https://www.jimscellars.com.au/	Liquor	New South Wales
Jimmy Brings	https://jimmybrings.com.au/	Liquor	South Australia
Kent Street Cellars	https://kentstreetcellars.com.au/	Liquor	New South Wales
Laneway Liquor	https://www.lanewayliquor.com/	Liquor	New South Wales
Liquor Home Delivery	https://www.liquorhomemedelivery.com.au/	Liquor	Liquor Store
Liquor Shed	https://www.liquorshed.com.au/	Liquor	Liquor Store
Liquorland	https://www.liquorland.com.au/ordering/delivery	Liquor	Liquor Store
Menu Log (Hotel Northbridge - Fuse Bar)	https://www.menulog.com.au/takeaway/perth-city-wa/alcohol	Delivery app	3rd party**
Old Bridge Cellars	https://www.oldbridge.com.au/pages/delivery-terms	Liquor	Liquor Store
Our Cellar	https://www.ourcellar.com.au/	Liquor	New South Wales
Relish Gourmet	https://www.relishgourmet.com.au/product-category/gourmet-alcohol-baskets/	Gift service	Not stated*
St Annes Florist	https://stannesflorist.com.au/alcohol-delivery-perth	Gift service	Not stated*
Stoneville Liquor	https://www.stonevilleliquor.com.au/	Liquor	Liquor Store
The Freo Doctor	https://thefreodoctor.com/	Liquor	Liquor Store
Vintage Cellars	https://www.vintagecellars.com.au/	Liquor	Liquor Store
WA Cellars	https://wacellars.com.au/	Liquor	Special Facility + Wholesale

Wine Cow	https://www.winecow.com.au/	Liquor	Wholesale
Woolworths	https://www.woolworths.com.au/shop/browse/liquor	Supermarket	Liquor Store

*Businesses likely trading under an exemption to the Liquor Control Act (1989)

**Delivers alcohol under a 3rd party liquor licence