



CLUB MANAGERS' ASSOCIATION OF HONG KONG

12th September 2011

Food Branch, Food and Health Bureau
20/F Murray Building
Garden Road, Central
Hong Kong

Dear Sir/Madam,

Public Consultation on the Review of Liquor Licensing

The Club Managers Association of Hong Kong (CMAHK) is glad to see that the Food and Health Bureau conduct a review of the liquor licensing regulations and is seeking opinions from the public.

As a trade organisation, the CMAHK has reflected the thoughts of our members on various aspects of liquor licensing through the Business Liaison Group in the last 5 years. We are happy to provide the following opinions to some of the proposals of this consultation exercise:

1. Advertising an Application

We support the proposition that liquor licence applicants be allowed to choose between advertising their application on newspapers or a designated website maintained by LLB.

2. Duration of a Licence

We agree with the recommendation that the maximum duration of liquor licences should be extended to two years to reduce both the administrative and financial burden. In fact, if an annual review mechanism is to be put in place, the tenure of the licence can be extended even longer.

We suggest that LLB can set the threshold on the number of complaints to a low figure such as 3 times in order for this mechanism to achieve the desired monitoring purposes. It might also be considered that if a licensed establishment receives nil complaint during the two year period, LLB can automatically extend their licence annually within a maximum duration to encourage compliance of licensing regulations.

3. Natural Person and Reserve Licensee

We do not agree that the liquor licence should be issued only to a natural person as some catering establishments are run by sole proprietors while others are run by body corporates. It is therefore the responsibility of the company to ensure that the licensed premises are supervised and operated in accordance with the license conditions.

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It is felt that hefty fines, temporary suspension or the revoke of the liquor licence would be appropriate penalties to deter breaches of licence conditions. At the end of the day, what hurts a business most is that it has to pay fines from their profits or not being allowed to open for business.


We suggest that body corporates be allowed to become liquor licence holders and each corporation can assign a staff to be a licensee delegate and another one to be a reserve. If the licensee delegate leaves the corporation suddenly or is on temporary leave, then the reserve can automatically assume the delegate position without any disruption to the business. Since the reserve is already vetted by the LLB, the corporation can just submit a standard notification to the LLB by fax. At the moment, the procedures are really cumbersome for the transfer of licence. Even when a current licensee is on short leave out of Hong Kong, he or she has to fill in an application and the new applicant has to personally pick up the temporary licence from the LLB.

4. Classification of Licence

As a club industry, we would suggest that bona fide private clubs be categorised as a type of liquor licensed premises on its own. In Hong Kong, private clubs have to comply with the stringent regulations of the certificate of compliance. In addition, our premises are usually purpose built standalone structures which do not disturb the lives of other people. Genuine private clubs usually are very concerned with the safety and health of their club members and would have staff and security personnel supervising the facilities. Therefore, this group should be subjected to less rigorous regulations than the upstairs bars.

We hope that you would consider our comments and suggestions in your review of the liquor licensing regulations. If you have any queries, please do not hesitate to contact the undersigned on [REDACTED]

For and on behalf of the
Club Managers Association of Hong Kong



Betty Simpson
Acting Chairlady