



# Submission cover sheet

## Inquiry into the Liquor Amendment Bill 2025

Submission number: 005

Submitter: DoorDash

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## **SUBMISSION TO THE INQUIRY INTO THE LIQUOR AMENDMENT BILL 2025**

DoorDash commends the Government on its commitment to harm minimisation and appreciates the opportunity to engage with the Committee on the Liquor Amendment Bill 2025 (ACT) and provide input and evidence for consideration.

DoorDash (NASDAQ: DASH) is a global technology company that connects consumers with their favourite local businesses in more than 30 countries across the globe. By using the DoorDash mobile application or website (the “**DoorDash Platform**”), consumers are able to purchase a range of goods (including alcoholic beverages) from local merchants and have those goods delivered to them.

DoorDash launched in Australia in 2019 and is proud to operate across hundreds of communities throughout Australia, connecting consumers with local restaurants, small businesses, and independent delivery contractors - known as Dashers. We’re supporting thousands of merchants to reach new customers, providing Dashers with flexible earning opportunities, and partnering with nonprofit organisations to broaden food access and support local economies.

As an active participant in Australia's economy, DoorDash makes a meaningful contribution to local economic outcomes in the ACT. Thousands of small businesses and restaurants across the ACT partner with DoorDash to expand their businesses reach, receive more order volume, and increase their revenue. DoorDash also provides work opportunities for eligible individuals looking for an opportunity to earn additional income flexibly, on their own terms and connect with merchants and consumers in their local community.

Each year, DoorDash contributes tens of millions in direct economic value across the ACT, through merchant sales as well as earnings for Dashers.

### **DoorDash’s Responsible Alcohol Framework**

For years, DoorDash has safely and responsibly facilitated the delivery of alcohol in jurisdictions globally where it is legally permissible to do so. In Australia, DoorDash currently facilitates alcohol delivery in New South Wales, Queensland, Victoria and the Australian Capital Territory.

Safety on the DoorDash platform is paramount, and that extends to any customer making liquor orders through the DoorDash mobile application. All Dashers completing alcohol deliveries must complete mandatory compliance training, and DoorDash has a multi-layered compliance framework designed to ensure alcohol is sold and delivered responsibly and in accordance with applicable regulatory requirements.

### **ID checks**

As part of this framework, customers are required to upload valid photo identification on the Platform that demonstrates they are of legal drinking age. Consumers are only able to purchase alcohol after that ID is verified as a valid 18+ identification. This verification system meets the compliance requirements in other jurisdictions, including NSW, and is used in all states where alcohol is delivered.



Then, prior to providing alcohol to a recipient and completing a delivery, Dashers are required to scan the front of a customer's ID with the DoorDash app to verify the customer is of legal age prior to handing off and completing the delivery. Dashers must also explicitly confirm in our app that the customer is not intoxicated. If the ID is unable to be verified or another issue arises, the Dasher is instructed to contact DoorDash support who will assist the Dasher with returning the alcohol to the merchant.

These technology solutions are layered on top of multiple prompts and reminders to every driver (or "Dasher") throughout the delivery process to check and vet each alcohol recipient's ID to ensure they are of legal drinking age. Moreover, we have ensured that every Dasher delivering alcohol has access to alcohol awareness education on how to complete alcohol deliveries in a compliant, safe, and responsible manner.

### **Dasher Alcohol Delivery Compliance and Safety Protocols**

DoorDash maintains strict standards for Dashers involved in alcohol deliveries across Australia to ensure compliance with applicable laws. These include:

#### Eligibility and Background Checks

- All Dashers must be 18 years or older to deliver on the DoorDash platform. Age verification occurs during the Dasher's onboarding process.
- DoorDash partners with the National Crime Check (**NCC**) to conduct background checks as part of the onboarding process, further supporting safety and compliance.

#### Mandatory Alcohol Delivery Training

To ensure Dashers are fully equipped to manage alcohol deliveries responsibly, DoorDash requires:

- Completion of an in-app Alcohol Certification Training for all Dashers prior to being equipped to deliver alcohol; and
- In New South Wales and the Australian Capital Territory, Dashers must also complete the Responsible Supply of Alcohol Training (**RSAT**), in addition to the aforementioned DoorDash's in-app training.

#### Refusal Criteria – Alcohol Deliveries

Dashers are explicitly instructed not to complete an alcohol delivery if any of the following conditions are present:

- The recipient appears to be intoxicated
- The recipient is not physically present to receive the delivery
  - *Alcohol deliveries may not be left unattended under any circumstances*
- The recipient is under 18 years of age
- The recipient is unable to present valid physical identification
- The ID provided on the DoorDash application or to the Dasher for verification is expired or invalid

These protocols are in place to uphold DoorDash's commitment to legal compliance and community safety.

### **Exclusion process**



DoorDash has also implemented measures to ensure that individuals who have self-excluded, are unable to place or receive alcohol deliveries through the DoorDash marketplace platform. Specifically, any individual who is self-excluded is prohibited from placing alcohol orders on the DoorDash website or mobile application.

With respect to individual self-exclusion requests, such requests can only be reversed if the specific individual who elected to self-exclude: (i) requests to end the exclusion period; and (ii) upon review of the request, DoorDash considers, given the case-by-case facts and circumstances, that it should be reverted. In addition, DoorDash then enforces a 48-72 hour cooling off period before the self-exclusion reversion request is completed.

Please see the below link to DoorDash's Alcohol Support Resources in Australia, that further explains DoorDash's self-exclusion policy, and provides consumers with the link to submit their exclusion request.

- [Exclusion from alcohol orders](#)
- [Self-exclusion request](#)

### **Preventing harmful drinking patterns**

DoorDash has established an alcohol harm minimisation framework, informed by an expert third party, Drinkwise, which includes a tiered safety system to identify and engage with customers based on their alcohol ordering patterns. This program has been designed to promote responsible consumption of alcohol, and progresses from providing consumers with targeted education to prevent harm, through to enforcement of temporary or permanent restrictions for at-risk customers.

The framework assesses order patterns over time and provides interventions at different levels of risk. Initially, DoorDash surfaces moderation messaging to customers, explaining the DoorDash alcohol opt out services and support services. If these patterns continue, the messaging escalates to warnings about potential exclusion, followed by temporary account restrictions, and in persistent cases (within a 90-day timeframe), permanent restrictions.

Restrictions also apply to customers who have experienced delivery refusal due to intoxication or identification issues, or who have repeatedly triggered the risk criteria within a 90-day timeframe.

This process is designed to be a supportive and educational journey, with escalating interventions to promote responsible use of our platform and ensure customer safety.

### **Concerns with the Bill**

DoorDash strongly supports evidence-based reforms that enhance community safety and the protection of platform workers. While we are in broad agreement with many of the proposals suggested, and already conform to the majority of them, we have significant concerns with the proposal for a two hour delay on all orders, and suggest further thought or clarification on some other aspects of the bill.

### **Two-Hour Delivery Delay**



We support evidence-based measures that reduce alcohol related harm, but we are concerned that a mandatory two hour delay for all deliveries is disproportionate to the risk and does not adequately account for harmful drinking patterns. These behaviours are more effectively identified through platform and app-based harm minimisation frameworks, such as DoorDash's DrinkWise-informed framework. A more targeted and proportionate framework would achieve stronger harm minimisation outcomes without (i) imposing blanket delays on the entire community; and (ii) reducing consumer choice for responsible adults.

- **Does not target harmful patterns:** Evidence shows that frequency of delivery is associated with higher risk, rather than merely that all deliveries carry equal risk. For example, Coomber et al (2025) found that among home-delivery alcohol consumers, the subgroup with frequent deliveries, delivery while intoxicated, and continuation of drinking sessions accounted for significantly higher odds of alcohol-related harms. These findings suggest that regulatory frameworks which flag frequency patterns, ensure intoxication and ID validation, or target high-risk delivery locations, rather than applying a universal delay of two hours to all orders, would better align with the core harm-minimisation objective. For example, DoorDash already implements real-time behavioral data tracking that allows it to intervene rather than a static two-hour time delay.
- **Places unfair imposition on consumers:** A blanket two-hour delay would be easily exploited by bad actors, while significantly disrupting legitimate, low-risk orders, such as dinner pairings or small celebratory purchases. As it stands the Bill would require consumers who need to purchase an item from a liquor store to supplement a home cooked meal, to either get in their car to make the purchase, or to add an additional meal item to their order at their own cost. In practice this makes online liquor purchasing for responsible adults prohibitively expensive.
- **Increases drink-driving risk:** A two hour delay risks the adverse outcome of more consumers getting in a car to purchase alcohol when they may already be over the legal limit.
  - In a recent Retail Drinks Australia survey 91% of respondents said they would obtain alcohol by other means if a 2 hour delivery delay was introduced.
- **Redirects consumers to unsafe channels:** While platforms like DoorDash may be forced to introduce a delay on orders, consumers may utilise other unregulated digital forums to procure alcohol in the limited window such as other online marketplace apps, online forums including location specific peer to peer groups, that do not have requisite ID checking or safety protocols in place.
- **Is anti-competitive and hurts smaller vendors:** forcing consumers to order from bricks and mortar retailers will benefit existing alcohol vendors that already enjoy a significant market advantage of scale and size. Our app enables consumers to browse options including smaller vendors and driver orders to those businesses. A two hour delay for online orders would undermine competition, stifle innovation, and entrench existing key players' market dominance.

To support the Committee in its deliberations, it is worth considering data that platforms like DoorDash can provide about how consumers are engaging with online platforms to purchase liquor.

For DoorDash, most alcohol orders take place during the dinnertime period, as a pairing to a home cooked or delivered meal. The majority of consumers who purchase alcohol on the DoorDash platform would place an alcohol order once (50%) or twice (15%) per year. Of those consumers who have ordered alcohol, the overwhelming majority have only placed one alcohol order in a single day 90%.

#### **Alcohol Delivery Training Requirements**



DoorDash also strongly supports the need for mutual recognition of interstate responsible service of alcohol training programs, such as NSW's Responsible Supply of Alcohol Training. In a jurisdiction such as the ACT with significant cross-border activity, this is a sensible approach. We support the objective of ensuring that individuals involved in alcohol delivery are appropriately trained. However, we are concerned regarding the proposed training obligations for same-day delivery providers, particularly the requirement that *“each person in the corporation having day-to-day control of delivery operations for the supply of liquor by same-day delivery”* under s 143R(5) of the Bill.

While the Bill does not require training for all employees of a licensee, the current drafting of the bill is ambiguous and risks unintentionally capturing individuals who do not directly supervise alcohol deliveries. The phrase “day-to-day control of delivery operations” is not defined in the Bill. In a modern digital platform-based delivery environment, where delivery partners are independent contractors, operations are decentralised, and product handling is limited to licensed retailers, this phrase could be interpreted to include employees who do not physically handle alcohol, supervise delivery partners, or make delivery-related decisions on a daily basis. We note that no other jurisdiction in Australia has this broad training requirement for same-day delivery operators and encourage the government to remove this from the Bill.

Thank you for your consideration of this submission as well as the time and effort with which the Government has invested in this important issue. We would be pleased to meet with the committee to discuss our submission should you have any questions regarding our platform or positions on the ACT Government's Bill.

Ends.