Q1. Are online direct retailers (e.g., FairPrice online) required to have liquor licences if they supply liquor?

Yes, under section 4(1) of the Liquor Control (Supply and Consumption) Act 2015, any person or business (including an online direct retailer or an electronic commerce platform) must not supply any liquor unless the person or business is authorized by a liquor licence to supply the liquor.

Q2. Are electronic commerce platforms (e.g., Carousell, Facebook Marketplace, Gumtree, ST Classifieds, Food Panda, GrabFood, Qoo10, Shopee) required to have liquor licences if they allow users to sell liquor on these platforms?

Yes, under section 4(1) of the Liquor Control (Supply and Consumption Act) 2015, any person or business (including an online direct retailer or an electronic commerce platform) must not supply any liquor unless the person or business is authorised by a liquor licence to supply the liquor.

If the online platform is an electronic commerce platform as defined in the preceding Paragraph 3 of this advisory, it must have a liquor licence to sell liquor on its platform. In addition, any person or business who supplies liquor through an electronic commerce platform must not do so if he knows, or ought reasonably to know, that the person or business operating the electronic commerce platform does not take all reasonable steps to ascertain that the buyer is 18 years or older, warn the buyer that it is an offence to buy liquor if he is younger than 18 years and inform the buyer about the penalty for the offence.

Q3. Are third-party delivery companies (e.g., SingPost, Ninja Van) required to have liquor licences if they deliver liquor for their clients?

No, under section 4(2)(a) of the Liquor Control (Supply and Consumption) Act 2015, no liquor licence is required for the delivery only to a person, at the request of that person, of liquor that is owned by, or ordered under a contract of purchase by, that person.

Q4: Are Internet-based messaging services (e.g., WhatsApp, Telegram) or telecommunication services (e.g., Singtel, Starhub) required to have liquor licences if users supply liquor over these services (e.g., WhatsApp chat or phone call)?

Currently, these services are not considered to be supplying liquor under the Liquor Control (Supply and Consumption) Act 2015 as they do not regulate or monitor the content of the chats or calls. As such, these services are not required to have liquor licences.

Q5. Are liquor licensees allowed to store liquor outside of their licensed premises, e.g. warehouses?

Regulation 9 of the Liquor Control (Supply and Consumption) (Liquor Licensing) Regulations 2015 has been deleted and there is no longer a requirement for licensees to keep or store liquor at their licensed premises. Licensees may therefore store liquor outside their licensed premises.

Q6. What are reasonable steps which a licensee can take to comply with the requirement that the licensee must not supply any liquor to an individual who is younger than 18 years online (whether through electronic commerce platforms or otherwise) or telecommunication services operated by the licensee?

Some examples of reasonable steps that can be taken by a licensee include:

- Prior to or at the point of sale, requiring the buyer to confirm and declare that he is 18 years or older;
- Warning the buyer that it is an offence to buy liquor if the buyer is younger than 18 years; and
- Informing the buyer about the penalty for the offence.