

SB 924 - Proposed changes to 4COP SFS license requirements

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On November 16th, Florida Senator Bradley filed [Senate Bill 924](#), which if enacted would materially change the qualification requirements for a type 4COP SFS Florida liquor license. As a quick refresher, the [Florida Division of Alcoholic Beverages](#) (“ABT”) has various retail liquor [license options](#) for restaurants and bars that want to sell alcoholic beverages for on-premise consumption (meaning that the patron would consume the beverage at the establishment, like in restaurants, bars, nightclubs, etc.). The most common license types are:

License	Alcohol	General Overview
2COP	Beer & wine	No food %, minimum square footage or sea/occupancy requirements; ¹ Also allows for package sales of sealed beer & wine
4COP Quota	Beer, wine & spirits	No food %, minimum square footage or seat requirements; ² For use in a particular county only, and limited based on population. Must be purchased on the open market from a current license holder, or won through a yearly lottery; Also allows for package sales of sealed beer, wine & spirits; Generally, business has to be open at least 8 hours/day for 210 days/12-month period
4COP SFS	Beer, wine & spirits	Food service establishment with: 51% of gross food & beverage revenue from food & non-alcoholic beverages 2,500 square feet of service area Equipped to serve 150 meals at one time ³ Note that there are special acts applicable to certain areas in Florida that have different requirements

SB 924, if enacted, would change the requirements for this last license type – the 4COP SFS license – by lowering the number of meals that a restaurant would have to be able to serve at one time from 150 to 100.

This would be a very important development for restaurants that want to be able to serve spirits, but cannot fit 150 seats (or occupants per their fire occupant load) in their spaces. [More to come on the progress of this bill!](#)

If you have any questions on this, or any other alcohol-beverage related issue, please do not hesitate to reach out.

¹ Local zoning laws may require certain food %s or square footages to qualify for a particular type of use (restaurant, bar, etc.). See [this article](#) for more information on zoning-related issues.

² See FN1.

³ While the “150” requirement is not technically a seating requirement, it can play out that way in practice, because ABT looks at seating or occupancy loads when reviewing these type of license applications.