

Director-General of Licensing

Decision Notice

Matter:	Application for Increase in Gaming Machines
Premises:	Howard Springs Tavern Lot 40 Whitewood Road Howard Springs NT
Applicant:	NT Pubco Pty Ltd
Nominee:	Ms Karen Houlihan
Submissions:	Mr Gerry Wood MLA
Legislation:	Section 41 <i>Gaming Machine Act</i>
Decision of:	Director-General of Licensing
Date of Decision:	20 June 2016

Background

1. On 18 January 2016, Mr Matt Dowling on behalf of NT Pubco Pty Ltd (“the Applicant”) applied for an increase in the number of gaming machines authorised for use at the Howard Springs Tavern (“the Tavern”) pursuant to section 41 of the *Gaming Machine Act* (“the Act”).
2. Regulation 3(a) of the *Gaming Machine Regulations* (“the Regulations”) sets the maximum number of gaming machines that may be authorised for a Category 1 licensed premise at 20 gaming machines. Regulation 2(2)(a)(i) of the Regulations defines a Category 1 licensed premise as a premise for which a hotel liquor licence is in force at any particular time. The Applicant is the holder of a licence issued under the *Liquor Act* endorsed AUTHORITY – TAVERN, being liquor licence number 80303036. Section 3 of the Act defines “hotel liquor licence” as including a licence endorsed with the words “AUTHORITY TAVERN”, as is the case in this instance.
3. Under section 41(1) of the Act, a licensee may apply to have the number of gaming machines authorised for use under a gaming machine licence increased. The Director-General of Licensing (“Director-General”) may grant or refuse such an application and in determining the application shall have regard to Part 3, Division 5 of the Act.
4. The Applicant currently holds a Gaming Machine Licence and is seeking to increase the number of gaming machines from its current level of ten to a proposed new number of 20 gaming machines. The application was accompanied by the prescribed application fee and the prescribed levy for the ten additional gaming machines sought by the Applicant.
5. The application was also accompanied by the required Community Impact Analysis (“CIA”) prepared by Commercial Licensing Specialists, a Gold Coast based company established in 1996 that comprises a group of consultants who specialise in knowledge, procurement of and compliance with administrative procedures in respect to liquor licensing, excise licensing, club licensing, gaming licensing and casino licences.

6. As required by the Act, the application was advertised in the NT News on 24 February 2016. The period for the lodgement of submissions in respect of the application closed on 25 March 2016.

Consideration and Reasons

7. When determining this application, the Director-General must have regard to relevant provisions of the Act and Regulations, including but not limited to the statutory objects of the Act which are:
 - (a) *to promote probity and integrity in gaming;*
 - (b) *to maintain the probity and integrity of persons engaged in gaming in the Territory;*
 - (c) *to promote fairness, integrity and efficiency in the operations of persons engaged in gaming in the Territory;*
 - (d) *to reduce any adverse social impact of gaming; and*
 - (e) *to promote a balanced contribution by the gaming industry to general community benefit and amenity.*
8. Additionally, pursuant to section 41(4) of the Act, the Director-General shall when determining an application for an increase in the number of gaming machines authorised for use, have regard to:
 - (a) *the increased number of gaming machines that the applicant seeks to have authorised for use under the gaming machine licence;*
 - (b) *if section 41A applies – the community impact analysis;*
 - (ba) *if section 41B applies – any submissions received under the section;*
 - (c) *the gross monthly profit of existing gaming machines operated on the premises;*
 - (d) *the hours and days when the premises are open for the sale of liquor;*
 - (e) *the size, layout and facilities of the premises together with any proposed modification or relocation of the gaming machine areas of the premises; and*
 - (f) *such other matters as the Director-General considers are relevant.*

Increased number of gaming machines

9. The Applicant seeks to increase the number of gaming machines from its current level of ten to a proposed new number of 20 gaming machines, an increase of ten gaming machines. The Applicant currently holds Gaming Machine Licence No. GM245 and currently operates ten gaming machines on the premises, the maximum number allowable prior to the lifting of the cap on gaming machines in the NT.
10. As noted above, the maximum number of gaming machines for a Category 1 licensed premise is now set at 20. The Applicant is the holder of a tavern liquor licence and the premises are considered to be a Category 1 licensed premise pursuant to 2(2)(a) of the Regulations. As such, the Applicant is entitled to apply for an increase of ten gaming machines and, if granted, I am satisfied that the number of gaming machines on the premises would be within the statutory limit of twenty gaming machines.

Community Impact Analysis

11. Pursuant to section 41A(2) of the Act, the CIA must provide details pertaining to:
- (a) *the suitability of the premises to which the application relates having regard to the size, layout and facilities of the premises;*
 - (b) *the suitability of the premises to which the application relates having regard to the primary activity conducted at the premises;*
 - (c) *the suitability of the location to which the application relates having regard to the population of the local area, the proximity of the premises to other gaming venues and the proximity of the premises to sensitive areas such as schools, shopping centres, other community congregation facilities, welfare agencies, banks and pawn brokers;*
 - (d) *the appropriateness of problem gambling risk management and responsible gambling strategies;*
 - (e) *economic impact of the proposal including contribution to the community, employment creation and significance or reliance of the venue to or on tourism.*

Suitability of Premises – size, layout and facilities

12. The CIA does not include information about floor space distribution. However the Applicant has included a plan of the licensed premises for the purpose of identifying proposed changes to the layout and re-location of the gaming room, should this application be approved. It is proposed that the gaming room will be relocated to a section of the current dining/bistro area, resulting in no increase in the venue's licensed area and no significant alteration to the configuration of the premises so as to require formal approval or advertising of the renovations. The area of the Tavern dedicated to the gaming room, following its relocation, will still comprise a relatively small percentage of the overall footprint of the Tavern.

Suitability of Premises – primary activity

13. The CIA states that there is a mix of facilities at the Tavern including bars, bistro, pool tables, playground for children, as well as Keno and TAB facilities and the current ten gaming machines.
14. The CIA provides information regarding the venue's financial performance. In the 2014/15 financial year, it is reported that 23% of the venue's revenue tax was derived from gaming. This is projected to rise to 24.5% this financial year and to 29.5% the year if the application for additional gaming machines is approved.
15. The CIA and records held at Licensing NT show that the venue has experienced a substantial increase in gaming revenue over the last three years which could be attributed to a number of factors that include the introduction of note acceptors and increased patronage arising from the Inpex project that has a 3 500 bed workers' camp in close proximity to the Tavern. Management of the Tavern has also confirmed that the Inpex workers have made a significant difference to the venue's overall financial performance including gaming machine revenue over the last four years.
16. However, on the basis of the financial analysis provided, it appears that the majority of the venue's revenue is generated by sources other than gambling, namely food and liquor sales.

Suitability of Location - population of local area, proximity to other gaming venues and proximity to sensitive areas

17. The Local Community Area ("LCA") agreed to with Licensing NT for use in the development of the CIA is Howard Springs which falls within the wider Litchfield Municipality Local Government Area. The vast majority of the LCA is utilised for rural and residential living, while a smaller proportion zoned for commercial, community and conservation use. The commercial zones are predominantly used by retail and service businesses, and community zones include public and private education providers.
18. The CIA reports that the area has a moderate population density which can be expected for a residential rural area of this nature. The LCA had a population at the time of the 2011 census of 4 298 people. The estimated population in 2016, based on an estimated annual growth rate of 2.1%, is 4 899 of which 80.5% (3 943) are over the age of 18 years, as compared with 74.4% in the Litchfield LGA, and 72.5% across the wider Northern Territory.
19. Approximately 7.3% of LCA's residents were identified as being Indigenous (Aboriginal and/or Torres Strait Islander) this is slightly higher than the Litchfield LGA of 7.1% and much lower than the Northern Territory wide figure of 26.8%.
20. Median weekly household income for the LCA is estimated at \$1 857 compared with the Litchfield LGA at \$1 767 and the wider Northern Territory at \$1 674. Statistics indicate that there is a much higher level of home ownership within the LCA at 75.1% when compared to the wider Northern Territory benchmark of 46.2%.
21. The CIA contains information in relation to the Australian Bureau of Statistics' Socio-Economic Indexes for Areas ("SEIFA") which is a product that enables the assessment of the welfare of Australian communities based on census data relating to household income, education, employment, occupation, housing and other indicators of advantage and disadvantage.
22. There are a number of ways to view the scores from the SEIFA, with one being through the decile score system where a ranking is given from one to ten with one indicating that an area is in the bottom 10% of areas in terms of socio-economic advantage (in other words, the most disadvantaged) and a decile score of ten indicating that the area is in the top 10% of areas thus being the most advantaged. The CIA states that the SEIFA analysis shows that the Howard Springs LCA is an area of high social advantage with the majority of the LCA falling within the 8 decile range. The overall SEIFA score for the LCA was only marginally lower than Greater Darwin, again indicating that the LCA is in an area of relative social advantage.
23. The CIA indicates that within the LCA there is only one other gaming venue, this being the Virginia Tavern which is located on the edge of the LCA. The Virginia Tavern is also in the process of applying for additional gaming machines.
24. It is evident that the accessibility to gaming machines by those people residing in the LCA will increase should this and any similar applications be approved. However, the SEIFA decile scores which identify that the LCA area is generally not regarded as an area of socio-economic deprivation also needs to be taken into consideration in determining whether an increase in accessibility to gaming machines within the LCA will lead to greater harm. It would appear that the profile of the majority of residents living in the LCA does not mirror the profile of those most at-risk of experiencing harm from gambling.
25. Another consideration to take into account is that whilst the gaming machine density would increase should this and any similar applications be approved, the patron source for this venue and others in this area is not restricted to just residents of the LCA. Although the LCA does not attract the same number of tourists and visitors as the Darwin City LCA, visitors do

account for a percentage of patrons of the Tavern, particularly if Inpex construction workers are taken into account. As a result the actual gaming machine density per 1 000 head of local residents may in fact be lower than current and projected figures if these additional persons were taken into account in gaming machine density calculations. Considerations around problem gambling risk management and responsible gambling strategies implemented by the venue must also be taken into account.

26. Pursuant to 41A(2)(c) of the Act, the CIA must provide details with respect to the proximity of the premises to sensitive areas such as schools, shopping centres, other community congregation facilities, welfare agencies, banks and pawn brokers. In doing so, the CIA accompanying this application has identified a number of sites including a primary school, early learning centre and a shopping centre within 400 metres of the Tavern. None of these sites are designated to provide problem gambling specific assistance such as emergency relief or counselling.
27. There are other sensitive sites within the CIA but given the rural nature of the area these are located a considerable distance away, out of view of the Tavern and deemed unlikely to suffer adversely by this application for additional gaming machines. The CIA advises that although several sensitive sites were identified the venue has a long history in the area and has demonstrated strong policies to minimise harm in the local community.
28. Of particular note the CIA reports that despite concerns raised around the proximity of gaming venues to schools there is no evidence to suggest that the proximity of children to gaming venues is in itself problematic. It is however accepted that when high traffic community sites, such as schools, shopping centres and community facilities, are located in proximity to gaming machine venues that high risk patrons may be prone to "convenience gambling" whilst attending such sites whilst conducting their daily activities.
29. The venue currently holds a gaming machine licence and has not been the subject of any complaint or disciplinary action in respect of the manner in which gaming machine activity at the Tavern is conducted. On the basis of the information available above, I am satisfied that the venue's location continues to be suitable for the operation of gaming machines.

Appropriateness of problem gambling risk management and responsible gambling strategies

30. The CIA states that according to the 2014 report 'Gambling Harm in the Northern Territory: An Atlas of Venue Catchments', which was a report prepared for the Community Benefit Committee through the Department of Business in May 2014, that 16.7% of gaming machine users were classified as problem gamblers. This group represented 2.7% of all visitors to the Tavern which was not significantly higher than the other venues included in the study. Whilst the presence of problem gambling in the LCA was evident, the findings did not indicate the Tavern or the LCA were characterised by particularly high rates of problem gambling.
31. The CIA reports that it is important to note that the study was not carried out exclusively in the Howard springs LCA and that the patron catchment included persons from Palmerston, Virginia and Humpty Doo. Additionally, the study excluded visitors, members of the armed forces and people temporarily residing in the area for work places, again potentially skewing the results.
32. The CIA also sets out the policy and procedures underpinning the responsible delivery of gaming services relevant to the Tavern in some detail. Harm minimisation strategies and measures noted in the CIA include the display of responsible gambling material, the presence in the gaming room of Responsible Gambling Liaison Officers and clearly accessible information relating to exclusion procedures. In addition, ATMs at the Tavern will be located away from the gaming room and access will be restricted to savings and cheque accounts, cheques will not be cashed in the gaming room and win cheques will not be

cashied within 24 hours of receipt. These are also requirements that must be met to ensure the venue complies with gaming machine audits conducted by Licensing NT officers on a regular basis.

33. Further information was sought from the Applicant in relation to this application and as a result, a copy of the venue's Responsible Gambling Incident Register was provided for the past 12 months. The Register shows one incident occurred during this period, the result of a patron requesting to be placed on a self-exclusion ban for 12 months. The lack of entries could raise concerns that incidents are not being properly recorded. Alternatively, it may simply be that there are no incidents to record as the management of the business conducted under the Gaming Machine Licence and the manner in which the Applicant conducts and manages the overall business of the premises causes few, if any, incidents or causes for concern in relation to gaming on the premises. It should be noted in this regard that the Tavern has not been the subject of any gambling related complaint or investigation since first obtaining a gaming machine licence in 2007.
34. The policies in place at the venue at present are compliant with the current Code of Practice for Responsible Gambling in the Northern Territory and there is no indication that an increase in the number of gaming machines at the venue would require any amendment or addition to those policies or existing procedures relating to the management and monitoring of gaming.

Economic impact - contribution to the community, employment creation and significance/reliance of the venue to or on tourism

35. The CIA states that the venue currently employs 30 local staff, ten full time and 20 casual, with one employee undertaking full-time gaming duties. Management of the Tavern anticipates that if this application is granted they will need to employ additional 2.5 full-time staff to ensure the safe, efficient and responsible administration of gaming facilities. The CIA states that the majority of employees are sourced locally although during the peak of the dry season the Tavern does employ backpackers on a casual basis.
36. The CIA also presents data pertaining to tourism with the statistics showing that the LCA continues to attract visitors to the area. It should be noted that the LCA is an important thoroughfare for other tourism destinations to the east and north-east of the Territory.
37. So far as community consultation is concerned, the CIA reports that attempts were made to contact 24 charitable and community organisations to ascertain their views on the potential impact of this application within the LCA. Despite follow up contacts only two entities agreed to participate in the survey and one of those returned a completed questionnaire. The two organisations that did respond to the authors of the CIA were not in support of the application on the grounds that it would have a negative impact on the community and would lead to increased problem gambling. The CIA notes from this process there was no indication that problem gambling was notably high within the LCA, or that there was necessarily a high potential for such issues in the community.
38. Whilst the concerns expressed by those organisations that did complete the Community Representative Feedback survey should be noted and taken into account they cannot, in my view, given the generalised nature of the comments, be afforded any significant weight in determining the outcome for the application specific to the Howard Springs Tavern.

Written submissions in response to the application

39. As required by section 41B of the Act, notification of the application was advertised in the Northern Territory News on Wednesday 24 February 2016. Pursuant to the Act, a written submission may be made to the Director-General within 30 days of the notification.

40. One submission was received during the prescribed period from Mr Gerry Wood MLA, Independent Member for Nelson, the electorate within which the Tavern is located. Mr Wood states that the Tavern is a family venue that has been affected by the influx of fly in-fly out (FIFO) workers who reside in a workers' camp in close proximity to the Tavern. He submits that owners of the Tavern are seeking more gaming machines to cash in on the extra money in the community due to the location of the FIFO workers. He states that when the FIFO workers depart the Tavern will be left with 20 gaming machines when ten is enough for the permanent residents of the community. Mr Wood notes that the problems associated with gaming machines are well documented by organisations such as Amity
41. Mr Wood also made adverse comments regarding the CIA submitting that some of the analysis is stretching the limits of belief. He states the community consultation conducted by the authors of the CIA did not include contacting local residents, including himself. He submits that no real consultation was undertaken and that the application should be rejected on that important point alone. Mr Wood also queries the veracity of the conclusion within the CIA that the additional gaming machines will enhance the amenity and character of the local community as a tourism and leisure centre. He states that whilst some visitors staying at the caravan park may visit the Tavern the addition of ten gaming machines will not be the reason for their visit.
42. Mr Wood also notes the statement in the CIA that gaming machines will add to the "number of recreational activities in the immediate area" and queries how gaming machines are classified as a recreational activity. He also queries whether sponsorships and donations from the Tavern to the community will increase in proportion to the expected increase in gaming revenue. Mr Wood also suggests that the statement that 2.5 additional staff will be required if the additional ten gaming machines are approved is an exaggeration aimed at assisting the application to succeed. Mr Wood also states that gaming machines take money out of the community and therefore less money will be spent at local retail outlets.
43. In his submission Mr Wood queries whether the provision of information to patrons regarding gambling risks and suggests the recent introduction of five and ten cent gaming machines will actually encourage higher risk gambling. He states that whilst the addition of ten gaming machines in the LCA will not in itself make a huge difference to problem gambling levels the additional gaming machines already granted to 13 venues in the wider Darwin Community will have a much greater effect that cannot be ignored.
44. Mr Wood notes that he is not against pokies per se however numbers should be limited and ten is sufficient, especially taking account of the revenue generated from gaming machines. He also states that the CIA is neither neutral nor independent as evidenced by the lack of real local data and supporting evidence. Mr Wood concludes by stating that pokies are designed for people to lose money which means more profit for the Tavern, less money going into the wider community and more problem gamblers.

Gross monthly profit of existing gaming machines operated on the premises

45. Statistical information held by Licensing NT indicates that for hotels and taverns with gaming machines in the Northern Territory for the 2014/15 financial year the average gross monthly profit was \$6 468 per machine. For this venue, Howard Springs Tavern, the average gross monthly profit per machine is over \$12 000. Additional statistics were also obtained from a Community Venue Product Performance Report which shows substantial increases in turnover and profit performance for the Tavern in the last few years.
46. The increase in gaming machine turnover and profit over recent years is most likely attributable to the introduction of note acceptors and, as noted in Mr Wood's submission, the close proximity of the Tavern to the Inpex village which houses the FIFO workers. In addition, the population of the LCA has increased by 2.1% annually over recent years as set out above in paragraph 18.

47. When assessing the financial analysis included within the CIA and data held by Licensing NT it is apparent that approximately 23% of the Tavern's revenue in the previous financial year was generated by gaming machine activity. Projected revenue for the current financial year indicates that gaming machine revenue will be 24% of total revenue. The CIA predicts that gaming machine revenue is expected to increase by 35% after 12 months of operation of the additional ten gaming machines, accounting for an estimated 29.5% of total revenue for the Tavern. The percentage of revenue derived from gaming activity is higher than that for similar tavern style venues and again this is most likely attributable to the patronage of the premises by the FIFO workers housed nearby.
48. Should the application be approved, the cost to the Applicant of installing ten additional gaming machines will be in the order of \$200 000, representing only for the cost of the machines and the proposed alterations to the premises. That amount does not include the application fee or the costs associated with the preparation of the CIA.
49. The CIA states that the management of the Tavern will make economic contributions to the community through a number of means including sponsorships to the value of \$7 500 per year, donations to the local community to the value of approximately \$3 000 and that the Tavern will continue to support local clubs by allowing them to conduct raffles at the venue to raise money for their respective activities. In addition, the CIA reports that it is anticipated that the value of contracts to supply goods and services to the gaming operation will amount to \$150 000 per annum.
50. The Financial Analysis provided within the CIA indicates that the venue is currently profitable and, unlike a number of the community gaming venues, does not overly rely on profits generated from gaming machines. Whilst the gaming machine revenue represents a significant percentage of the Tavern's overall revenue it is apparent that the venue would remain profitable without gaming activity.

Hours and days when the premises are open for the sale of liquor

51. The hours of trade for the lounge bar and dining room are from 12:00 noon to 2:00 am the following day seven days per week. The public bar is authorised to trade from 10:00 am to 11:30 pm from Sunday to Thursday with closure extended to 1:00 am on Fridays and to 1:30 am on Saturdays. The hours are reflective of those applicable to similar style venues and less than those in the Darwin CBD where taverns are generally authorised to trade until 2:00 am each day.

Size, layout and facilities of the premises

52. The percentage of the total area of the tavern dedicated to the gaming room is discussed above. Whilst the Applicant intends to carry out alterations to the premise to accommodate an additional ten gaming machines there will be no increase to the existing licensed area of the Tavern. The Applicant advises that the focus of the venue will not change, that being a family oriented tavern that provides quality meals, outdoor beer garden, playground for children, sports bar, TAB and Keno facilities, live music and other forms of social entertainment.
53. The Gaming and Liquor Amendment Bill of 2015 amended the Act to effectively lift the previously imposed cap on authorisations of gaming machines in licensed hotels, taverns and clubs in the Northern Territory. As well as lifting the overall cap, the amendments also provided for an increase of the number of gaming machines in taverns and hotels, which allows for a maximum of 20 machines, up from the previous maximum of ten gaming machines. At the time of introducing the amendments, the Minister for Racing, Gaming and Licensing noted that the arbitrary Territory-wide cap was abolished in favour of a rigorous community impact assessment process for new applications and for applications seeking additional gaming machines.

54. Against that background the Applicant has presented a well prepared application with strong supporting evidence indicating that this application meets the requirements of the Act in relation to an increase in the authorised number of gaming machines.
55. The comprehensive CIA prepared for the purpose of this application is analysed in considerable detail above does not raise any issues specific to the Howard Springs Tavern indicating that it would not be suitable for additional gaming machines.
56. The harms associated with gaming machines and problem gambling are well documented and well known within the general community. However, the Applicant in this instance has in place policies and procedures that will have the effect of minimising the harms associated with gambling generally and the use of gaming machines specifically at the venue under consideration.
57. The CIA suggests that non-government community organisations who responded via the Community Representative survey have concerns with the application believing the increase in gaming machines will have a negative effect on the community and, as a result, those organisations do not support the application. Whilst these comments and submissions are properly made, and no doubt indicative of the views of the organisations represented, they do not provide any specific details of prospective harms or potential adverse community outcomes directly related to the venue.
58. In his submission Mr Gerry Wood states clearly that he does not support the application, submitting there is no real need for additional machines which will have an adverse effect on the local community. He was also critical of the consultation process stating that local residents had little input. Mr Wood also emphasises that the FIFO workers engaged for the construction of the Inpex plant are regular patrons of the gaming activity available at the Tavern. There are no reasons to doubt that submission and in fact management of the Tavern acknowledges that to be the case. The Inpex development has regularly been lauded as a project that will bring financial benefits to many sectors of the Darwin economy. It would appear that the Howard Springs Tavern is one of the beneficiaries and it is difficult to find fault with a business that takes advantage of the increased opportunities that result through the conduct of lawful and regulated activities, such as the operation of gaming machines.
59. In addition, Government has specifically removed the former cap on the number of gaming machines in the NT via the 2015 amendments to the Act with a view to allowing licensed premises, such as the Howard Springs Tavern, to increase their numbers of gaming machines. Whilst Mr Wood's concerns are properly articulated, and no doubt genuinely founded, they do not carry sufficient weight in this instance to persuade me to refuse the application for additional gaming machines to be located at the Tavern.
60. In respect of the management of problem gambling, the Applicant's submissions in support of the application and the content of the independently prepared CIA, demonstrate clearly that the Applicant intends to incorporate strategies aimed at reducing gambling related harm should the application be approved.
61. When considering this application it must be remembered that the cap on Territory gaming machine numbers had been in-place since 2008, a considerable period of time for a region that experienced an increase in population during the same period. Once the cap was lifted it was apparent that there would be a considerable number of applications for new and additional gaming machines.

Decision

62. For the reasons set out above, and in accordance with section 41(3) of the Act I have determined to grant the application lodged by NT Pubco Pty Ltd and authorise the increase of the number of gaming machines located at the Howard Springs Tavern from the current limit of ten gaming machines to the maximum currently allowable for the holder of a tavern liquor licence, namely a maximum of 20 gaming machines.
63. The additional approved ten gaming machines are required to be included in the schedule attached to the gaming machine licence in which each individual gaming machine is identified and authorised for use. The schedule will be updated upon submission by the Applicant of the details pertaining to the additional ten gaming machines.

Review of Decision

64. Section 166A of the Act provides that a decision of the Director-General, as specified in the Schedule to the Act, is a reviewable decision. An application under section 41 of the Act for an increase in the number of authorised gaming machines is specified in the Schedule and is a reviewable decision. Section 166C of the Act provides that a person affected by this decision may seek a review before the Northern Territory Civil and Administrative Tribunal. Any application for review of this decision must be lodged within 28 days of the date of the decision. For the purposes of this decision the affected persons, as defined by section 166B of the Act, are Mr Gerry Wood MLA and the Applicant.



Cindy Bravos
Director-General of Licensing

20 June 2016