

Director-General of Licensing

Decision Notice

Matter:	Application for Increase in Gaming Machines
Premises:	Airport Tavern 227 McMillans Road Jingili NT 0810
Applicant:	Australian Leisure and Hospitality Group Pty Ltd
Nominee:	Ms Kate McIntosh
Submissions:	Nil
Legislation:	Section 41 <i>Gaming Machine Act</i>
Decision of:	Director-General of Licensing
Date of Decision:	29 January 2016

Background

1. On 28 August 2015, Australian Leisure and Hospitality Group Pty Ltd ("the Applicant") applied for an increase in the number of gaming machines authorised for use at the Airport 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 under section 41 of the Act. 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.
3. Under section 41(1) of the Act, a licensee may apply to have the number of gaming machines authorised for use under the license 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 application was accompanied by the prescribed application fee and the prescribed levy for the ten additional gaming machines applied for. The application was also accompanied by the required Community Impact Analysis ("CIA") prepared by HWL Ebsworth, Lawyers.

Consideration and Reasons

5. 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.*

6. 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*
 - (c) *such other matters as the Director-General considers are relevant.*

Increased number of gaming machines

7. 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 is currently authorised to operate ten gaming machines on the premises, the maximum number permitted prior to recent amendments to the Act.
8. Regulation 3 of the Regulations sets the maximum number of gaming machines for a Category 1 licensed premise at 20. The Applicant is the holder of liquor licence number 80303220, issued under the *Liquor Act* and endorsed AUTHORITY – PUBLIC HOTEL, which is defined under section 3 of the Act as a hotel liquor licence. Consequently the premises are considered to be Category 1 licensed premises pursuant to regulation 2(2)(a) of the Regulations.
9. As such, the Applicant is able 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 20 gaming machines.

Community Impact Analysis

10. 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

11. The CIA states that the Tavern was constructed around 1998 and has operated as a public hotel continuously since that time. The Tavern was granted authorisation for the operation of ten gaming machines in the late 1990's under gaming machine licence number GM 264. In the event the application for an increase in the number of gaming machines is approved it is

proposed that the gaming room will be shifted approximately 20 metres from the present location and minor renovations will include the construction of a wall to separate the gaming room from the bistro restaurant. The cost of the renovations is estimated at between \$150,000 and \$200,000.

12. The Tavern is located in the northern suburbs of Darwin, in the suburb of Jingili and in close proximity to the Darwin International Airport. Whilst the floor plan accompanying the CIA does not provide a breakdown of the areas allocated to different activities of the premises it is apparent that the gaming room occupies a relatively small area of the total footprint of the Tavern building. The information contained in the CIA indicates that gaming machine activity is not the primary focus of the venue nor is the venue overly reliant on gaming machine revenue to maintain commercial viability.
13. The Applicant purchased the business from the former owners in February 2014 and has since modified the business operations of the venue to fit within its national business model, including dispensing with R rated entertainment and focussing on a more family friendly environment.
14. The Tavern offers the usual range of facilities and services normally associated with a suburban Tavern, including bars, a drive through bottle shop, bistro dining area. The Tavern also offers TAB and Keno facilities. Live entertainment is currently not offered at the venue however the Nominee for the premises suggests that entertainment by interstate and local artists is proposed for the near future.

Suitability of Premises - primary activity

15. The CIA describes the venue as a medium sized business in the northern suburb of Jingili and notes that the venue is now owned by a national company with a clear strategy in respect to the management of gaming machines. The venue is described as being an integral part of the Airport Area community for many years. In a statement annexed to the CIA the Nominee/Manager describes the Tavern as a regular meeting place for the local community and local business operators.
16. The CIA reports the customer base as comprising a mix of short stay transit travellers from the airport, visiting sporting groups utilising the nearby Marrara Sports Complex and motel guests from the adjoining motel. However it is reported that at least half of the venue's clients are residents of the surrounding suburbs who travel to the venue on foot, by car, taxi or other transport. In addition, some members of the sporting bodies who frequent the venue travel from further afield.
17. The statement of the Nominee/Manager indicates that the venue experiences higher numbers of patrons soon after opening, attributable mainly to retirees and travellers, and again around 4.30 to 5.00 pm on business days, attributable to local businesses, contractors and residents attending for after work drinks and gatherings. She also states that the bistro enjoys increased patronage on weekends and that at the busier times the gaming machine area becomes proportionally busier. The gender of gaming machine players appears to be evenly divided between male and female clients and ages are proportionate to that found in the demographic profile identified for the purposes of the CIA.
18. The author of the CIA states that the gaming machines at the Tavern generate a modest proportion of the total revenue earned by the venue and concludes that there is less likelihood that commercial imperatives might interfere with the Applicant's obligations in respect of appropriate responsible gambling strategies. The statement in respect of the proportion of revenue derived from gaming machines is supported by the financial data included in the confidential section of the CIA.

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

19. As noted above, the Tavern is located within the northern suburbs of Darwin and in close proximity to the Darwin International Airport. The venue has proven to be suitable as licensed premises since opening in 1998, including the conduct of gaming machine activity since the late 1990's. The northern suburbs were developed in the 1960's and 1970's with Jingili being approximately 11 kilometres from the Darwin CBD.
20. The Local Community Area ("LCA") for the Tavern has been identified as the Airport Area, comprising the suburbs of Alawa, Jingili, Moil, Anula and Malak-Marrara. This area was selected on the basis it is the primary area that would experience any impact from the addition of gaming machines allowing that the majority of patrons of the Tavern derive from this area. The delineation of Airport Area as the LCA was agreed by Licensing NT.
21. The total adult population of the Airport Area at the time of the 2011 census was 8,916 with the growth in population over the preceding period estimated at approximately 1% to 2% per annum. The median age of residents across the suburbs included in the LCA ranges from 33 to 35 years of age. The percentage of residents born in Australia ranges from 74.5% for Jingili to 56.4% of Alawa residents. Unemployment rates ranged from 3.2% to 4.7% at the time of the 2011 census. The percentage of residents identifying as being of Aboriginal or Torres Strait Island heritage ranged from 9.0% to 13.1%.
22. The CIA includes 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. The CIA states the SEIFA ratings for the Airport Area do not vary significantly between the suburbs included in the LCA. The CIA states that the Alawa, Moil and Anula areas have a moderate incidence of advantage according to the ABS census statistics with a decile rating of 6. This compares to the Marrara-Malak area with a decile rating of 5 and the Jingili area slightly at the higher end of the scale with a decile rating of 7 in terms of socio-economic advantage/disadvantage.
23. There are numerous gaming sensitive sites within the LCA but few, if any, within close proximity to the Tavern. It is noted that the Tavern has operated as a licensed venue for some considerable time, including offering gaming machine facilities since the late 1990's, without any indication of adverse impacts on the gaming sensitive sites identified in the CIA
24. In comparison to other gaming machine venues with the Greater Darwin Area, there are relatively few venues within the LCA offering gaming machine facilities. There are no other hotels/taverns in the LCA offering gaming machines however there are three community/sporting clubs in the area which do offer gaming machines to their members and guests. Including the Tavern, there are currently 77 gaming machines located within the LCA. Gaming machine density per 10,000 head of adult population is significantly lower than for other LCA in the Greater Darwin Area.
25. The Tavern currently holds a gaming machine licence authorising the operation of ten gaming machines and has done so for some considerable time. On the basis of the available information and the material presented in the CIA, 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

26. The CIA reports that Young Doran Markham (2014) research into problem gambling by NT residents for the purpose of the 2014 report 'Gambling Harm in the Northern Territory: An Atlas of Venue Catchments' confirms that problem gamblers make up a small percentage of the number of gamblers but account for 30% of the total gambling expenditure. Approximately

600,000 Australians play gaming machines weekly, equating to 4% of the adult population, and of that group 15% are considered to be problem gamblers who account for around 40% of the total spending on gaming machines.

27. The CIA also states that the Young Doran Markham (2014) research found that 86.2% of clients of the Airport Tavern were considered to be non problem gamblers, 8.8% were considered low risk, 3.1% were moderate risk and 1.9% were considered to be high risk problem gamblers. Those figures must be viewed with some caution due to the low response rate of the survey conducted however it should be noted that the percentages of moderate to high risk gamblers are considerably lower that for similar venues in the Greater Darwin Area.
28. In her statement accompanying the CIA the Nominee/Manager for the premises states that the Applicant has well designed policies and procedures in relation to the management of gaming machines which go beyond what is required by the NT Code of Practice for Responsible Gaming. She also states that a key component of employee training focusses on how to approach and interact with customers, including ensuring compliance with the self-exclusion program.
29. Both the CIA and the statement of the Nominee/Manager emphasise the significance of the Applicant's voluntary commitment to introduce pre-commitment technology at the Tavern in the coming months, described as the cornerstone of the Applicant's responsible gambling plan. The features of the pre-commitment system to be implemented include the capacity for clients to set daily or weekly loss limits, playing time limits and a bar on increasing loss or time limits during the same day of play. Details of a player's loss or playing time limits will be displayed on the gaming machine being used. The Applicant's voluntary implementation and promotion of pre-commitment demonstrates a proactive approach to the management of the gambling component of its business.
30. The CIA reports that all duty managers engaged at the Tavern hold a Responsible Service of Gaming Certificate and that four current employees hold a Machine Manager's Licence.
31. The Tavern has in place a responsible gambling incident register and ensures recording of action taken by staff in respect of enforcement of the Code of Practice for Responsible Gambling. An inspection of samples from the incident register indicates that the Tavern staff utilise the incident register in a responsible and proactive manner.

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

32. The CIA includes the Tavern's financial data from 2014 / 2015 financial year. The CIA reports that there has been a steady growth in gaming machine turnover at the Tavern over the past three financial years, demonstrating a demand for that form of entertainment by clients. The venue has generated considerable gaming taxes over the same period together with significant levies paid to the Community Benefit Fund. The CIA reports that an increase in gaming machines to the maximum allowable number of 20 will result in a significant increase in both gaming tax and Community Benefit levies. The CIA also notes that the Tavern is a significant contributor to the local economy, as evidenced by the businesses who supply goods and services to the venue.
33. The financial data included in the confidential section of the CIA indicates that revenue from gaming activity was 23.73% of the Tavern's total revenue for the previous financial year. That figure confirms that the venue is not overly reliant on gaming machine income to sustain its financial viability. The CIA estimates that the projected net gaming revenue for a 12 month period is expected to increase by 35%, based on the Applicant's interstate experience, should the application for additional gaming machines be approved.

34. In terms of employment, the Tavern currently employs 36 permanent full time or casual staff, commensurate with a tavern of similar size offering like facilities for clients. The breakup of staff activities and duties notes 19 front of house staff, eight take-away bottle shop staff and nine kitchen staff. The nominee/Manager reports that the majority of staff employed are from the surrounding suburbs and Palmerston.
35. The CIA states that the Tavern contributes to various charities, sporting bodies and community groups, including Wanderers Football Club, Brothers Rugby League, Northern Districts Netball, Childhood Cancer and the Starlight Foundation amongst other similar charities and sporting clubs. The CIA also highlights the Applicant's contributions to the community in interstate jurisdictions where its involvement in the hotel industry has existed for some considerable time.
36. In respect of the net economic impact, the CIA concludes that the Tavern is a significant contributor to the local economy as is apparent from the vast list of local businesses who supply goods and services to the venue and the employment of a significant number of local residents. The Applicant is said to have a policy of using local suppliers and services where possible. The CIA also notes that the net overall impact of the increase in gaming machines will be modestly positive for the community of the Airport Area and very positive for the revenue earned to Government.

Written submissions in response to the application

37. As required by section 41B of the Act, notification of the application was advertised in the Northern Territory News on Wednesday 7 October 2015. Pursuant to the Act, a written submission may be made to the Director-General within 30 days of the notification. No submissions were received by the Director-General during the submission period.
38. The authors of the CIA did carry out community consultation as a component of the preparation of their assessment of the application in the CIA. In the course of that consultation written submissions were received from NT Shelter, St Vincent de Paul Society (NT) Inc. and Amity Community Services Inc.
39. NT Shelter is the peak non-government housing and homelessness advocacy body in the NT and does not support the installation of a further ten gaming machines at the Tavern. NT Shelter's submission raises concerns that the additional gaming machines will have an adverse effect on the local community due to the number of licensed venues in the Darwin suburbs and the potential for a proliferation of gaming machines. The submission refers to studies which have established a strong link between the number of poker machines in Victorian local government areas and the amount of harm generated for problem gamblers and the subsequent increase in the need for counselling services. NT Shelter submits that increased access to gaming opportunities directly results in increased problems. NT Shelter also submits that a lower socio-economic status generates a higher rate of counselling requirements and that there is a need to undertake robust research on the impact of such a venture on the Airport Area community.
40. In response to the submission from NT Shelter, the CIA states that the views expressed are not confined in the factual sense to the situation within the Airport Area. The CIA notes that the characterisation of the customers of the Tavern as being of a lower socio-economic status has some validity when considering the data in the SEIFA index for two of the suburbs in the LCA. However, as noted above, other suburbs within the LCA are rated between decile 5 (average) and decile 7 (moderately advantaged). The CIA states that the Airport Area in general cannot be described as being of lower socio-economic status.
41. The submission from St Vincent de Paul Society (NT) Inc. opposes the application and enclosed the Society's National Policy Statement on Harm Minimisation in the Poker Machine Industry, published in December 2010. That policy statement includes reference to pre-commitment

technologies and policies aimed at reducing the prospect of harm to potential problem gamblers.

42. The CIA addresses the submission from the St Vincent de Paul Society and notes the general nature of the objection to the poker machine industry per se. The CIA notes the support for harm minimisation measures and emphasises that the Applicant's proposal to introduce pre-commitment technology at the Airport Tavern is significant in terms of the response to the Society's submission, more so as that technology is not currently mandated by any NT law, guideline or policy.
43. Amity Community Services Inc. lodged a written submission titled "Community Impact Analysis – Airport Hotel" in respect of the application. Amity has been working in the area of gambling related problems and harm for over two decades and their programs are underpinned by the Public Health Model. Amity works predominately in the areas of prevention of and intervention in problem gambling areas by providing extensive training, education, community liaison and health promotion in consultation with the gambling industry. Amity provides its services throughout the Territory with the aim of implementing harm minimisation strategies for safer gambling.
44. Amity does not support an increase in the number of gaming machines in the Airport Area and is of the view, based on the balance of research on the issue of gambling outcomes, that an increase in gaming machines in the community will have an overall negative effect on the health, social and economic welfare of at least a proportion of the population of the NT. Amity submits that aside from the identified harms to the community arising from gambling, evidence indicates that a clear, albeit complex, relationship exists between increasing availability and/or density of gambling opportunities and increased levels of associated problems.
45. Amity's submission refers to the recommendation of the Productivity Commission's 2010 reporting that applications for increased gaming machines should be assessed on the basis of the net detriment to the Community. The submission queries industry's argument, as evidenced in Community Impact Analysis reports in the public domain, that increased gaming revenue over the past few years is indicative of a demand for more gaming machines. The submission notes that in the NT player expenditure has increased over the last 12 months and contends that gross profit is actually net player loss.
46. In response to the submission from Amity, the CIA notes that the Applicant has indicated on its website that it considers the concerns that have been expressed in various reports and studies associated with harm arising from the use of gaming machines are legitimate and must accordingly be taken seriously and addressed appropriately. The CIA states that the approach to mitigation adopted by the Applicant appears to be a reasonable and proportionate response to managing that risk.
47. The CIA also notes that of the submissions received, none have suggested that the gaming machines operated at the Tavern have been inappropriately managed. The Applicant's voluntary implementation and promotion of pre-commitment demonstrates a proactive approach to the management of the gambling component of its business.

Gross monthly profit of existing gaming machines operated on the premises

48. As noted elsewhere in this decision, the CIA reports that there has been a steady growth in gaming revenue at the Tavern over the past three years, demonstrating a demand for that form of entertainment. The Tavern has generated significant taxes and contributions to the Community Benefit Fund over the same period.
49. The Financial Analysis provided within the CIA indicates that the venue is currently profitable and would still be a profitable enterprise even without the revenue derived from gaming machines.

50. The trading hours for the Tavern vary for the different areas within the premises. The trading hours for the Public Bar are 10.00 am to 22.00 pm from Saturday to Thursday and from 10.00 am to 23.30 pm on Fridays. For the Saloon Bar-Bistro and Beer Garden the trading hours are 10.00 am to 22.00 pm on Sundays, 10.00 am to 23.30 pm on Mondays and Tuesdays and from 10.00 am to 1.30 am the following day from Wednesday to Saturday. No trading is permitted on Good Friday and Christmas Day. Those hours are typical of those applicable to Taverns in the Greater Darwin Area where the liquor licence provides for late night trading.

Size, layout and facilities of the premises

51. This issue is discussed earlier in this decision and the ratio of floor space allocated to the gaming room in comparison to the other public areas of the Tavern is reasonable and commensurate with that of a tavern offering gaming machine activity.

Other matters the Director-General considers relevant

52. 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 in the number of gaming machines for hotels and taverns with existing gaming machines from ten to a maximum of 20 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.
53. Against that background the Applicant the subject of this decision has presented an independently prepared CIA 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. The fact that the Tavern is now owned by a national company with a clear strategy for the management of gaming machines and the associated potential for harm is also objectively a significant development in terms of the implementation of responsible gambling practices and procedures. As is the Applicant's voluntary intent to implement and promote pre-commitment technology in the near future and once the appropriate approvals for the technology have been obtained.
54. The comprehensive CIA prepared for the purpose of this application is analysed in some detail above and raises no issues specific to the Airport Tavern that would persuade me to reject the application.
55. The harms associated with gaming machines and problem gambling are well documented and well known within the general community. I am satisfied that 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 Airport Tavern.
56. The non-government community welfare agencies who submitted responses to the community consultation conducted by the authors of the CIA in respect of this application generally submit 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 those comments and submissions are indicative of the views of those organisations who deal regularly with the harms associated with problem gambling, they do not provide any specific details of prospective harms or potential adverse community outcomes directly related to the venue under consideration.
57. In addition, as evidenced by the Applicant's submissions in support of the application, including the content of the CIA, the Applicant intends to maintain strategies aimed at reducing gaming-related harm if the application is approved. It should also be noted that the Applicant, to its credit, proposes to voluntarily implement pre-commitment technology at the Airport Tavern in the near future, an initiative recommended by numerous studies into the means of minimising the harm associated with problem gambling involving gaming machines. Whilst a number of

Australian jurisdictions are considering mandatory pre-commitment technologies that is not the case presently in the NT.

Decision

58. 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 Australian Leisure and Hospitality Group Pty Ltd and authorise the increase of the number of gaming machines located at the Airport Tavern from the current limit of ten gaming machines to the maximum allowable for the holder of a tavern liquor licence, namely a maximum of 20 gaming machines.
59. 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, once they have been purchased.
60. As noted above, the Applicant has advised that there will be a requirement for some minor alterations to the fit out of the premises to accommodate the additional ten gaming machines, including the construction of an interior wall to separate the gaming room from the bistro and bar areas. The proposed alterations are not significant in nature and will most likely have the effect of separating and screening the gaming room from clients using the bistro restaurant. Once the plans for the alterations to the premises are finalised the licensee will be required to lodge an application for approval of the alterations by the Director-General and comply with the relevant provisions of section 43 of the Act.
61. In addition, section 119 of the *Liquor Act* directs that a licensee must not make a material alteration to the licensed premises without the Director-General's approval. As noted above, the alterations proposed by the Applicant are not significant so as to constitute a material alteration. The proposed alterations will in fact enhance the gaming room and assist in screening the gaming room from patrons who do not wish to use them. I have determined that the minor alterations proposed do not require approval under section 119 of the *Liquor Act* however the Applicant will need to comply with section 43 of the *Gaming Machine Act*, including the lodgement of the statutory declaration referred to in section 43(3) of the Act.

Review of Decision

62. 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 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 this decision. Section 166B of the Act provides that defines "aggrieved person" as including a person who made a submission, complaint or objection (however described) during the process that resulted in the decision being made. Whilst no submissions were lodged with the Director-General in respect of this application, the community welfare agencies identified in this decision did make submissions to the authors of the CIA. As a result the affected persons in respect of this application are NT Shelter, St Vincent de Paul Society (NT) Inc. and Amity Community Services Inc. and the Applicant.



Cindy Bravos
Director-General of Licensing

29 January 2016

