



## Director-General of Licensing

### Decision Notice

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<b>Matter:</b>	Application for Increase in Gaming Machines
<b>Premises:</b>	Palmerston Tavern Lot 1110 Chung Wah Terrace PALMERSTON NT 0830
<b>Applicant:</b>	Australian Leisure and Hospitality Group Pty Ltd
<b>Nominee:</b>	Mr Brett Wilson
<b>Submissions:</b>	Nil
<b>Legislation:</b>	Section 41 <i>Gaming Machine Act</i>
<b>Decision of:</b>	Director-General of Licensing
<b>Date of Decision:</b>	13 January 2016

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### Background

1. On 2 September 2015, Australian Leisure and Hospitality Group Pty Ltd ("the Applicant") applied for an increase in the number of gaming machines authorised for use at Palmerston 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 under its current authorisation.
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 - TAVERN, 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 as a purpose built tavern and has operated as such continuously since 1984. The Tavern has been authorised for the operation of ten gaming machines since the late 1990's. In the event the application for an increase in the number of gaming machines is approved there will be a requirement for minor alterations to the premises, including the construction of an interior wall to separate the gaming room from the bistro and bar areas.
12. The Tavern is located within the CBD of the City of Palmerston and in close proximity to numerous other businesses, commercial sites and community facilities. The Tavern building footprint comprises an area of approximately 1 200 square metres with the total area of land being 2 120 square metres. The existing lounge bar/gaming area occupies 139 square metres of the total floor space of the Tavern, commensurate with the information contained in the CIA that gaming machine activity is not the primary focus of the venue nor is the venue overly reliant on gaming machine revenue.
13. The Tavern offers the range of facilities and services for the use of its clients that would be expected of a suburban Tavern, including bars, a drive through bottle shop, dining areas and the existing gaming room situated at the centre and towards the rear of the premises. The Tavern also offers TAB and Keno facilities and holds regular entertainment events, including local and interstate artists and the like. In addition, the Tavern incorporates an enclosed glass walled play room offering children's entertainment at appropriate times.

### **Suitability of Premises - primary activity**

14. The CIA describes the venue as a mid-sized business in the Palmerston Area 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 conveniently located for all persons who access the Palmerston CBD including growing numbers of international and interstate visitors. The Tavern is also described in the CIA and in the attached statement of Mr Brett Wilson, the Nominee under the liquor licence, as a meeting place for a number of local clubs
15. Since being acquired by the current licensee company, the Tavern no longer offers "R Rated" entertainment with the current focus being on a more family friendly atmosphere.
16. The Nominee of the premises, states that the Tavern has been an integral part of the Palmerston community for many years and a meeting place for the local community and business operators. In Mr Wilson's assessment the clientele mix includes office workers, business operators and employees and workers from the construction industry, including those engaged in the Inpex development. The venue also enjoys patronage from guests staying at the nearby Quest Palmerston Apartments with whom they have a good working relationship including a facility where guests of the Apartments can have meals at the Tavern billed to their Quest account.
17. Mr Wilson also notes that the Tavern has an increase in patrons soon after opening and again around 5.00 pm which he attributes to shift workers and retirees in the early hours of the day, with local contractors and workers attending for after work drinks and gatherings.
18. The author of the CIA states that the revenue generated from gaming machines forms a modest proportion of the total revenue earned by the Tavern and that the venue is not overly reliant on revenue earned from gaming machines. Those statements are 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 Palmerston CBD in close proximity to numerous commercial and business premises. The venue has proven to be suitable as licensed premises since opening in 1984, including the conduct of gaming machine activity since the late 1990's. The Palmerston area was established in 1980 and is located approximately 20 kilometres from the Darwin CBD. Palmerston is the second largest city in the Northern Territory with a population, as assessed by the City of Palmerston, currently in excess of 35 000 residents with this number expected to increase to 42 000 by 2021.
20. The Local Community Area ("LCA") for the Tavern has been identified as the Palmerston Area, comprising the suburbs of Palmerston, Durack, Marlow Lagoon, Driver, Moulden, Woodroffe, Rosebery, Bellamack, Bakewell and Gray. In recent years the City of Palmerston has regularly and consistently been reported as one of the fastest growing urban areas in Australia. The 2011 census data, so far as population is concerned, is of little assistance in this case due to the rapid increase in population since 2011 and the fact that, for many of the current suburbs of Palmerston included in the LCA, development had not even commenced at the time of the census.
21. The CIA notes that the median age of residents within the LCA, assessed on a suburb by suburb basis, is in the range of 26 to 31 years of age with residents born in Australia ranging from 61% to 80% of the total population across the various suburbs. As at the 2011 census date adult residents in full time employment ranged from 65% to 73% of the total adult population with unemployment rates ranging from 3.1% to 7% of adult population. The average weekly income for residents over 15 years of age was assessed by the 2011 census as being in the range of \$727 to \$1 044 per week across the suburbs included in the CIA.
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 Palmerston vary significantly between the suburbs included in the LCA. Rosebery and Durack fall within the 10<sup>th</sup> decile of advantage/disadvantage in comparison to the Northern Territory overall whilst the suburbs of Moulden and Gray are assessed at the 3<sup>rd</sup> decile respectively, indicating a fair degree of social disadvantage compared to the other suburbs within the LCA. The CIA notes that the explanation for the low decile ratings for Gray and Moulden appears to be linked to the fact that more public housing has been grouped into these suburbs which is stated to have substantially contributed to the comparative disadvantage.
23. Through no fault of the authors of the CIA, the data provided in respect of the number of gaming machines located within proximity to the Tavern is dated due to a number of the identified venues having received authorisation for additional gaming machines since the CIA was prepared. The CIA states that there are 132 gaming machines located in the Palmerston Area. That number has increased through recent authorisations to 175. On the revised figures, and adopting an estimated adult population of 22 795 adult residents for the LCA, the ratio is estimated at 76 gaming machines per 10 000 adult residents. That figure is significantly lower than that for the Greater Darwin Area of 142 machines per 10 000 adult residents. It should also be noted that of the 175 gaming machines located in the LCA 155 are located within clubs with only one other licenced public tavern offering gaming machines.

24. 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. The subject premises are in proximity to numerous gaming sensitive sites, not surprisingly allowing that the Tavern is located in the Palmerston CBD. The CIA lists numerous sensitive sites within the Palmerston Area including schools, shopping centres, welfare agencies, places of worship and the like where members of the public are likely to congregate. As noted in the CIA and supported by records held by Licensing NT, the Tavern has not been the subject of any negative findings in respect of adverse impacts on sensitive sites, or the community in general, despite having operated gaming machines from the venue since the late 1990's. The CIA notes further in that regard that none of the community groups contacted during the preparation of the CIA suggested that there were any problems with the manner in which the Applicant currently conducts the gaming machine component of its business.
25. The Tavern currently holds a gaming machine licence 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 of 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 in 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 spent around 40% of the total spending on gaming machines.
27. The CIA also states that the Young Doran Markham (2014) research found that 89.4% of clients of the Palmerston Tavern were considered to be non problem gamblers, 6.3% were considered low risk, 3.5% were moderate risk and 0.7% 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 is considerably lower that for similar venues in Palmerston and the Greater Darwin Area.
28. Mr Wilson submits in his statement accompanying the CIA that the Applicant demonstrates a best practice approach to the management of the gaming element of the Tavern's business. The current approach includes periodic training of relevant staff, participation in the self-exclusion program and other initiatives mandated by the NT Responsible Gambling Code of Practice. Of significance in that regard is the Applicant's voluntary commitment to introduce pre-commitment technology at the Tavern in the near future. The Applicant's voluntary implementation and promotion of pre-commitment demonstrates a proactive approach to the management of the gambling component of its business.
29. 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 conduct for responsible gambling. An inspection of samples from the incident register indicates that the Tavern staff take a proactive and responsible approach to their obligations in dealing with customers utilising the gaming machines.

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

30. 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. Not surprisingly, 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.
31. In terms of employment, the Tavern currently employs 45 to 50 permanent full time or casual staff, a significant number by Territory standards. Mr Wilson states that with very few exceptions most staff employed at the Tavern are from the Palmerston Local Community area or surrounding areas. The Applicant intends to employ an additional five full time or part time staff should this application be approved.
32. The CIA states that the Tavern contributes to various charities, sporting bodies and community groups, including McKillop Sharks, Children's Cancer Foundation, Epilepsy Foundation, Beyond Blue, Territory Thunder and Relay for Life. The CIA also refers to the Applicant's contributions to the community in interstate jurisdictions where its involvement in the hotel industry has existed for a longer period.
33. In respect of the net economic impact, the CIA states 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.

## **Written submissions in response to the application**

34. As required by section 41B of the Act, notification of the application was advertised in the Northern Territory News on Wednesday 16 September 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.
35. 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.
36. 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 Palmerston town centre 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 Palmerston community.

37. 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 Palmerston Area. The CIA notes that the characterisation of the Palmerston Area and 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 10 (most advantaged). The CIA states that the Palmerston Area in general cannot be described as being of lower socio-economic status however there are two suburbs within the LCA that do fit that description.
38. 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.
39. 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 Palmerston 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.
40. On 10 August 2015 Mr Bernard Dwyer, on behalf of Amity Community Services Inc., lodged a written submission titled "Community Impact Analysis – Palmerston Tavern" in respect of the within application. Mr Dwyer states that Amity has been working in the area of gambling 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.
41. Amity does not support an increase in the number of gaming machines in the Palmerston 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.
42. 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.
43. Amity submits that the average net player loss in community venues in the NT was \$159.69 per machine per day, an increase from the net player loss in the previous year of \$141 and representing a 12% increase, indicative of an increase in harms. Amity suggests that decreasing density of gaming machines is likely to significantly reduce gambling harms. Amity also notes that catchment areas for gambling venues often extend further than has previously been predicted and may lead to the understatement of density in some areas. Amity is of the view the evidence demonstrates that communities experiencing widespread social and economic problems are those communities that have higher concentrations of convenience gambling venues.

44. 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.
45. The CIA also notes that of the submissions received, none have suggested that the gaming machines operated at the Tavern have been inappropriately managed.

#### **Gross monthly profit of existing gaming machines operated on the premises**

46. 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.
47. 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.
48. The trading hours for the Tavern vary for the different areas within the premises. The trading hours for the Palm Bar and Beer Garden are 10.00 am to 23.59 pm seven days per week with no trading permitted on Good Friday and Christmas Day. For the 11-10 Bar and Bistro, including the Courtyard, the trading hours are 10.00 am to 23.59 pm Sunday to Tuesday, 10.00 am to 2.00 am the following day on Wednesday and Thursday and from 10.00 am to 4.00 am the following day on Friday and Saturday. Those hours are typical of those applicable to Taverns in the Greater Darwin and Palmerston regions where the liquor licence provides for late night trading.

#### **Size, layout and facilities of the premises**

49. 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**

50. 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.
51. Against that background the Applicant the subject of this decision has presented a comprehensive 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.

52. The comprehensive CIA prepared for the purpose of this application is analysed in some detail above and raises no issues specific to the Palmerston Tavern that would persuade me to reject the application.
53. 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 Palmerston Tavern.
54. 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 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 under consideration.
55. 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 has, to its credit, proposes to voluntarily implement pre-commitment technology at the Palmerston 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

56. 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 Palmerston 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.
57. 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 are purchased.
58. 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 bar and bistro. 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.
59. 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

60. 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 the within 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**

13 January 2016