

NORTHERN TERRITORY LIQUOR COMMISSION
NOTICE OF PROPOSED VARIATION OF LICENCE CONDITIONS

INQUIRY: REVIEW OF LIQUOR LICENCES AT PEPPIMENARTI AND DALY RIVER

FILE NUMBER: LC:OMV:2023-001

LICENSEE: Peppimenarti Club Association Incorporated

PREMISES: Peppimenarti Club
Peppimenarti
NT 0822

LICENCE NUMBER: 80304129

NOMINEE: Regina Wilson

LEGISLATION: Section 113 of the *Liquor Act 2019* (NT)

CONSIDERED BY: Russell Goldflam (Chairperson)
Dr Sean Taylor (Health Member)
Mr Bernard Dwyer (Community Member)

DATE: 17 January 2024

1. Section 113 of the *Liquor Act 2019* (**the Act**) confers power on the Northern Territory Liquor Commission (**the Commission**) to vary the conditions of a liquor licence on its own initiative. Before varying the conditions, the Commission must give the licensee written notice of the proposed variation, the reasons for the proposed variation, and an invitation to the licensee to respond to the proposed variation within 28 days.
2. This is a notice to the Peppimenarti Club Association Incorporated (**the licensee**) that the Commission proposes to vary the conditions of its liquor licence over the Peppimenarti Club (**the Club**).

BACKGROUND

3. Peppimenarti is a remote community of about 200 residents on the Daly River/Port Keats Aboriginal Land Trust, 320 km southwest of Darwin on the Port Keats Road within the area serviced by the West Daly Regional Council. The main languages spoken are Ngan'gi (also known as Marityemeri), Murrinh Patha, Kriol and English.

Peppimenarti was founded as a community in the early 1970s by Mr Harold Wilson and his wife Regina Pilawuk Wilson, an internationally renowned weaver and painter.

4. Also in the 1970s, Harold and Regina Wilson were instrumental in establishing the Deewin Kirim Aboriginal Corporation, which provides employment and support services to the community; and the Club, which now operates as liquor licensed premises with a community club authority. The objects of the licensee, which is incorporated under the *Associations Act 2003*, include the provision of cultural, social, recreational and sporting facilities and activities to the Peppimenarti area, and the operation of a licensed social club for the inhabitants of the Peppimenarti community. The Club is managed by a board (**the Board**) led by members of the Wilson family. John Wilson, a son of Harry Wilson, is the Club president. Remarkably, Regina Wilson has been the licence nominee continuously for over 34 years, after taking over from her husband in that capacity when he passed away in 1988. The licensee employs a manager, Mr Lukanovic, whose wife Annunciata Wilson is also a member of the Wilson family.
5. The Club is currently one of seven community-controlled licensed social clubs in remote Northern Territory communities. As is typical among these clubs, its licence conditions permit it to open for a three hour evening session four days a week, and the only types of alcohol that it is permitted to sell are mid-strength beer and mid-strength pre-mixed spirits.
6. On 7 November 2023, Ms Michelle Ganzer (**Ms Ganzer**), a Delegate of the Director of Liquor Licensing (**the Director**), wrote to the Commission requesting it to conduct a hearing with a view to varying the conditions of the licensee's liquor licence.
7. On 10 November 2023, the Commission met and determined to commence an inquiry pursuant to s 113 of the Act, and on 22 November 2023 the Commission conducted a hearing in Peppimenarti. In the same week the Commission also conducted hearings in two other communities in the Daly River district: Wadeye, where there are no licensed premises; and Nauiyu, which is located a few kilometres from the Daly River Inn.
8. As a result of these inquiries, the Commission has determined to:
 - a. propose variations to the conditions of the Peppimenarti Club licence (the subject of this notice);
 - b. not to propose variations to the conditions of the Daly River Inn; and

- c. engage with stakeholders with a view to identifying measures that can be taken to deter, detect and prevent the secondary supply of alcohol – or, as it is commonly called, grog-running – to remote communities both in the Daly River district and elsewhere.

A TROUBLED COMMUNITY

9. Tragically, in recent years Peppimenarti has been seriously affected by unrest and violence, some of which has been fuelled and exacerbated by alcohol.
10. In November 2021, using his powers under s 258 of the Act, the Commissioner of Police suspended the Club's licence for a period of 48 hours. As is required by the Act, the Commissioner notified the Chairperson of the Liquor Commission, and provided reasons for the suspension, as follows:

On the back of unabated and widespread riotous behaviour throughout the community of Peppimenarti that has resulted in significant threats to public safety and ongoing breaches of the peace, police visited the Peppimenarti Club Association Incorporated on 24 November 2021 as inspectors pursuant to the *Liquor Act 2019*. Whilst at the club officers conducted a number of compliance related activities and had cause to eject one patron from the premises and speak with another. Shortly after leaving the environs of the licensed premises, officers were violently targeted by a large armed group of persons whom a short time earlier had been consuming alcohol as patrons at the Peppimenarti Club Association Incorporated premises.

On 25 November 2021, Mr Ray Whear, CEO of Peppimenarti based Deerim Kirim Aboriginal Corporation, wrote to Police and expressed his concern over the ongoing riotous behaviour that was occurring in community. Mr Whear notes in his letter to police that:

The Peppimenarti Community and particularly the Traditional Owners and combined stakeholders are helpless victims of the breakdown of basic law and order and legal compliance. This has consequently resulted in potential irreparable damage to families, women, children and men. The impact of this trauma upon the Community will have long lasting ramifications for all individuals unless swift and decisive action is taken to address the current situation.

Over the past 22 months, every function of the Community has been grossly compromised in many contexts, including but not limited to:

- Up to 85% reduction in school attendance.
- Significant increase in school violence and behavioural issues.
- Cessation of Night-Patrol activities due to violence.
- Clinic closed or access limited with Doctor, Psychologist and specialty medical services cancelled.
- Clinic nurses afraid to go to parts of the Community.
- The Essential Services Officer's accommodation and vehicle has been broken into multiple times with personal items and tools stolen.
- 9 houses in Community are currently vacant as families under threats of violence and/or actual attacks are fearful to remain in their houses. Approximately 60 people are presently displaced from their homes.
- All the vacated houses have been unlawfully entered, trashed and the owners' belongings stolen or burnt.
- Numerous vehicles and personal belonging set on fire together with multiple attempts to burn houses including nurses housing.
- Threats of rape and sexual violence to women and young girls are a daily occurrence.
- Extensive overcrowding of 25+ people per house as families gather together for protection.
- Gravesites of adults and children desecrated and trashed.
- Families forced to live in workshops, office buildings and tents due to fear of constant night time attacks.
- Firearms, compound bows, axes, tomahawks and machetes openly used during day and night attacks without any consequences.
- Potentially unlicensed offenders posting threatening photos with firearms and weapons on social media.
- Increase in both mental health and substance abuse issues.
- Indigenous adults, families and children have left Community due to fear of violence.
- Shop access avoided and/or Police monitoring required for shopping.
- Access to fuel (diesel/petrol) restricted to shop opening hours.
- Police attendance (when available) at school closing time to prevent after school violence.

- Safe House facilities unused due to Territory Families neglect of Peppimenarti issues.
- Both indigenous and non-indigenous staff across all sectors have left Peppimenarti due to violence.

The above points are merely a simple summary of the substantial impairment caused to the culture and fabric of the Peppimenarti Community in recent times.

A review of Police indices is supportive of Mr Whear's assertion that a decisive plan is necessary and that violence in Peppimenarti is frequent and widespread, there are ongoing threats to public safety and significant breaches of the peace that amount to riotous behaviour.

11. Following a request by the Commission, the Director subsequently reported that an investigation by his office in consultation with police of the circumstances leading to the licence suspension had found that the attack on police near the Club on 24 November 2021 had not been the result of the Club's trading practices, and that accordingly, there was no basis for a complaint to be made that the licensee had contravened the Act or the conditions of its licence.
12. The Act confers on the Commission power to undertake inquiries on its own initiative, but to date the Commission has only ever exercised that power after receiving a request to do so from the Director, a government agency or a community-based organisation. Although the Commission was seriously concerned by the above reports, in the absence of any request, in 2022 the Commission determined not to take any action.
13. Prior to the expiry of the *Stronger Futures in the Northern Territory Act 2012* (Cth), Peppimenarti was an alcohol protected area, meaning that, other than at the Club during opening hours, the possession and consumption of alcohol was prohibited to people in the community unless they had been issued with a permit. In July 2022, when this legislation expired, the prohibition on drinking alcohol ceased. Unsurprisingly, it was soon reported that the influx of alcohol into the West Daly region increased.¹
14. In September 2022, a man died after being struck with an arrow in Peppimenarti, amidst what Chief Minister Fyles described as "unprecedented levels of community disruption of late".²

¹ Matt Garrick and Roxanne Fitzgerald, "Man dies after being struck by arrow in Peppimenarti amid ongoing unrest in West Daly region", ABC Online, 14 September 2022

² Ibid.

15. In January 2023, police reported further violent disturbances, including the wounding by gunshot of a 21 year old man and a 17 year old youth.³ The following month, the *Liquor Amendment Act 2023* came into force, restoring Peppimenarti to its previous status as a “dry” area. However, it is apparent that unlawful drinking in Peppimenarti has continued as a result of grog-running. Peppimenarti is by no means the only or even the largest community to be so affected. Wadeye, 90 kilometres to the west, with a population of well over 2,000, is a far more significant target for grog-runners.
16. In May 2023, the NT Government committed \$19 million to build a new police station at Peppimenarti.
17. On 19 August 2023, Ray Whear wrote an impassioned and lengthy open letter to the NT Government by on behalf of “the traditional owners, stakeholders and residents of the Peppimenarti community who have been plagued by violence and unrest over the past three-and-a-half years”. In the letter Mr Whear attributed the violence and unrest to “the Peppimenarti-based gang known as the Jovi Boys”.⁴
18. In September 2023, 10 young men described by police as members of a gang were arrested and charged with committing violence and weapons offences in Peppimenarti.⁵
19. On 13 October 2023, a prominent member of the community called 000 from inside the Club requesting police to attend. NT Police informed the Commission that according to the caller, who asked not to be identified, approximately ten young men who had all been drinking at the Club earlier had left but were now fighting outside the Club with weapons including steel poles. Police attended and were confronted by several intoxicated persons armed with various weapons including sticks, axes and a baseball bat. Due to limited police resources, police were only able to apprehend one of the people involved. He was arrested and charged with going armed in public and disorderly behaviour in a public place.
20. On 16 October 2023, NT Police wrote to the office of the Director proposing that the licence conditions of the Club be varied.

³ Alicia Perera, “NT police say man, 21, and boy, 17, receiving treatment for gunshot wounds following unrest in remote Peppimenarti”, ABC online, 26 January 2023

⁴ The letter was published on-line at <https://ntindependent.com.au/opinion-rhetoric-empty-promises-and-buck-passing-allows-jovi-boys-gang-violence-and-terror-in-peppimenarti/>

⁵ ABC online, “NT police arrest 25 after violence on Groote Eylandt, Peppimenarti”, 8 September 2023

THE REQUEST TO THE COMMISSION

21. Ms Ganzer's commendably prompt and sensible response was to arrange for her office to telephone and then write to John Wilson, the Club president, requesting him to urgently convene a meeting of the Board to consider whether to apply to the Commission for the following variations to licence conditions, which were based on and adapted from the proposals received from NT Police:

- a. A requirement to close the Club at the direction of NT Police or Licensing NT in the event of violent, quarrelsome, anti-social or riotous conduct within the community.
- b. A can limit per person, per day, of nine (mid-strength) cans.
- c. A range of hot food such as hot chips, sausage rolls and party pies be provided free of charge by the Club from 18:00 to 19:00 on trading days.⁶
- d. Installation of a CCTV surveillance system.

22. The Club was informed that NT Police had also suggested a requirement that patrons be subject to Banned Drinkers Register (**BDR**) screening before being permitted to enter the Club.

23. To its credit, on 27 October 2023 the Board met and provided a timely, detailed and considered response to this request, which is summarised as follows:

- a. Police closure of the Club: Supported in principle, but without enthusiasm, because:
 - i. The Club has not been the source of alcohol-fuelled unrest in Peppimenarti, and has only been the location of trouble when members of the "Jovi Gang" intoxicated by liquor brought from Darwin into the community have attacked the club with rocks and metal bars, when the Club was closed.
 - ii. A perennial problem in Peppimenarti is the failure of police to respond promptly to calls for assistance from community members.

⁶ The Commission notes that an existing condition of the licence is "The Licensee shall have substantial food available for patrons in the form of hot cooked food during trading hours."

- iii. Instead of focussing on the Club as a source of alcohol-related harm, police should act to stem the flow of “black market” alcohol into the community.
 - iv. Responsible service of alcohol is stringently practiced by the Club.
 - v. The Club has banned those responsible for violent and unruly behaviour.
- b. Can limit: Not supported, because it would be impracticable to enforce, as patrons often buy a round of drinks for a group. However, the Club is open to suggestions to limit the amount of alcohol that is consumed by patrons.
 - c. Food: Supported, as the Club already provides “free substantial food and BBQ meals”.
 - d. CCTV: Supported, and the Club will apply for BizSecure funding for this purpose.

24. On 7 November 2023, following what was in effect a decision by the Board not to apply to the Commission to vary its licence conditions, Ms Ganzer referred the above correspondence to the Commission, with a request that the Commission inquire into the matter. Ms Ganzer informed the Commission that Licensing NT had not identified any issues of non-compliance by the Club with its licence conditions over the previous three years.

THE HEARING

25. On 21 November 2023, the Commission conducted a hearing in Wadeye. At that hearing two issues arose that were of particular relevance to the Commission’s consideration of the conditions of the Peppimenarti Club. Firstly, the Commission heard unchallenged evidence from numerous Wadeye residents that grog running to Wadeye from Darwin along the Port Keats Road is prevalent. As previously noted, Peppimenarti is also on this road. Secondly, the Commission heard unchallenged evidence from numerous Wadeye residents that although Peppimenarti is only 90 km by road from Wadeye, the Club is not a significant source of alcohol-related problems in Wadeye.

26. On 22 November 2023, the Commission conducted a hearing at the Peppimenarti library, a conveniently short distance from the Club, which the Commission also took the opportunity to visit and inspect. Sixteen community members attended the hearing, including the Club president, the licence nominee, the Club manager and several members of the Board (**the Club group**). In addition, the two police

officers stationed at the community attended. Ms Ganzer attended the hearing on behalf of the Director.

27. During the day, the Commission became aware that some sections of the community were unwilling to attend the hearing at the library because of ongoing tensions within the community. Accordingly, during the afternoon the Commission reconvened in another area of the community known as “the Village”, where it met with a group of about nine community members who reside nearby (**the Village group**).
28. Both hearings were conducted with a minimum of formality, and the Commission acknowledges the constructive, courteous and candid contribution by the both the Club group and the Village group to the Commission’s inquiry.
29. The Commission summarises the main issues raised by the Club group as follows:
- a. The Board’s response to the variations proposed by Licensing NT as set out at paragraph 23 above was reiterated, elaborated on and confirmed.
 - b. Only a few Wadeye residents patronise the Club.
 - c. They are frustrated that young people from other families cause all the trouble in the community.
 - d. Police assess applications for permits for the consumption of liquor under Part 8 Division 6 of the Act, after consulting with a senior member of the community. Most non-indigenous resident staff and contractors have been issued with permits. Permits have been issued to five Indigenous community members.⁷ There is concern that some visiting contractors unlawfully supply liquor to traditional owners. (The Commission had heard similar allegations from Wadeye community members the previous day.)
 - e. The Board has obtained funding to engage a consultant to develop a community alcohol plan in support of a potential future application to revoke the interim alcohol protected area.
 - f. The only hot food currently provided by the Club is a free sausage sizzle every trading day from 17:30 to 18:30.

⁷ Following the hearing, Licensing NT informed the Commission that the issuing of new permits to residents of interim alcohol protected areas, including Peppimenarti, has been suspended. The Commission understands that this measure has been taken in anticipation of applications from affected communities to revoke interim alcohol protected areas, in accordance with the procedure provided by Part 8 Division 1 of the Act.

- g. The Club has applied for a grant to install a CCTV surveillance system.
 - h. The Club is willing to refuse service to people on the BDR. Police are willing and able to provide the Club with a list of local people who are on the BDR. There are currently 2 or 3 such people.
 - i. The Club Board (which met during a break in the hearing to consider this issue) asks the Commission to permit it to open an hour earlier on Fridays, and two hours earlier on Saturdays, but not to also open on Thursdays.
 - j. The Club manager informed the Commission that the Club currently only sells liquor in open cans, and intends to continue to do so. He suggested that a condition could be imposed requiring patrons to return an empty can when making a second or subsequent purchase.
 - k. If conditions are varied, they should be trialled for a period of 6 or 12 months.
30. The Village group do not patronise the Club. They informed the Commission that only two older men from the Village do so. They explained that due to ongoing tensions between clans within the community, they do not feel welcome in the Club, which is controlled by a particular clan group. They expressed frustration that their families are being unfairly blamed for all the trouble in the community.
31. The Commission visited the Club, which is set in a large, pleasant garden area with outdoor chairs and tables and shade trees, and a substantial covered paved patio area. The clubhouse itself is basic, with a bar, cool room, storage area and toilets. The kitchen, which is closed, has fallen into disrepair and would require significant renovation to be serviceable. A portable BBQ is used for the daily sausage sizzle. The only other food supplied by the Club are packets of potato chips. The Commission sighted handwritten notes recording what appeared to be transactions conducted in breach of s 100 of the Act, which prohibits the sale of liquor on credit.
32. Notwithstanding the assurances given to the Commission by the Board and the manager that responsible service of alcohol is stringently observed by the Club, two days after the Commission visited the Club, according to information provided to the Commission by NT Police, a male became intoxicated at the Club and travelled to his home at Palumpa (halfway between Peppimenarti and Wadeye), where he allegedly committed various violent offences there against members of his family while armed with a knife, before being arrested. NT Police have also informed the Commission of two further ongoing investigations in which residents of, respectively, Wadeye and Palumpa, had travelled to Peppimenarti to drink at the Club, following which, while intoxicated by liquor consumed at the Club, they

each allegedly assaulted their domestic partner with a metallic object, causing injury.

33. On 23 November 2023, the day after the Peppimenarti hearing, the Commission conducted a hearing at Nauiyu, and inspected the nearby Daly River Inn. Although the licensee, which trades with wayside inn and takeaway authorities, is a private company, that company is owned and directed by the local Indigenous community, and in that respect the Daly River Inn is closely akin to a community social club. The Commission was impressed by what it observed at Daly River Inn, and by what it heard about the operation of the Daly River Inn from the community members who participated in the Nauiyu hearing.

CONSIDERATION

34. The Commission is seriously concerned at the alarming levels of violence and unrest in Peppimenarti. Clearly, liquor is by no means the sole cause of these problems, and even when liquor is a contributing factor, the Club is not the only source of that liquor, and may not even be the main source. However, in the view of the Commission, in some respects the Club is not operating as well as it could, and varying the conditions of the Club's licence is likely to reduce alcohol-related harm in the area serviced by the Club.
35. That said, the Commission was impressed by the efforts of the Board and the manager to keep the Club going in very challenging circumstances. In part because of the tensions in this small and isolated community as a result of which a significant portion of the community has decided not to patronise the Club, its financial viability is uncertain.
36. The Commission considers that the Club has the potential to become an important amenity to help heal community division, strengthen social bonds and promote cultural harmony. However, that potential is beyond the power of the Commission or government agencies to achieve: it is up to the Board and the people of Peppimenarti to restore the Club as a venue which the whole community feels safe and welcome to use. To facilitate this, the Commission proposes several variations aimed at strengthening the measures available to management and staff to keep trouble-makers out of the Club.
37. The Commission accepts the views of the Board in relation to the club's opening hours, the proposed can limit, the provision of food and the installation of CCTV surveillance, as is reflected in the proposed variations.
38. Instead of proposing a can limit, the Commission proposes several conditions, some of which came from the Club manager, the purpose of which is to reduce the

risk of harm arising from patrons who have become intoxicated by liquor supplied by the Club.

39. The Commission acknowledges the reservations of the Board in relation to the proposal for the closure of the Club during periods of community unrest. The Commission was impressed by the unchallenged evidence of the officer in charge of the Peppimenarti police station, Jonas Johnson, that he has a good working relationship with the Club manager and the Board. On balance, the Commission has decided to propose that the Club be closed at the request of police following, where practicable, consultation with senior members of the community.
40. The Commission is on the one hand concerned that the Club does not appear to be operating in complete compliance with the existing condition regarding the provision of cooked hot food, and on the other hand sympathetic to the predicament for the Board that the facilities and funds currently available to the Club to improve and extend its food service are limited. The Commission proposes that the Club be allowed six months to develop a plan to address this issue.
41. In formulating the variations it proposes to make to the Peppimenarti Club conditions, the Commission has borrowed and adapted some of the “house rules” at the Daly River Inn.
42. The Commission has also had regard to the 2015 “Bowchung Report” compiled by Gillian Shaw, Maggie Brady and Peter d’Abbs for the Northern Territory Department of Business,⁸ which reviewed the operation of eight Northern Territory social clubs, including the Club. A key finding of the Bowchung Report was that communities with clubs do not appear to experience markedly higher alcohol related harms than those without clubs. The Report found that effectively managed and run social clubs can be a tool for harm minimisation. The proposed variations below are consistent with and in part based on the Bowchung Report recommendations.
43. The Commission’s proposal that the varied conditions be trialled for a period of six months is consistent with the views of participants at the hearing.

⁸ *Managing Alcohol Consumption: A review on licensed clubs in remote Indigenous communities in the NT* accessed at https://justice.nt.gov.au/_data/assets/pdf_file/0010/427537/D2016-0339-LR-Final-Report.pdf

THE PROPOSED VARIATIONS

44. The Commission proposes to fix the following conditions for a trial period of six months, following which the operation of the licence will be further reviewed.

- a. The hours of operation be extended to:
 - Tuesday 17:00 to 20:00
 - Wednesday 17:00 to 20:00
 - Friday 16:00 to 20:00
 - Saturday 15:00 to 20:00
- b. The licensee must maintain an attendance book and require all persons to sign it when they enter the premises, including the following details:
 - i. Name
 - ii. Residential address
 - iii. Date and time of entry to the premises
 - iv. Status (member, guest or visitor)
- c. The licensee must only serve alcoholic drinks in open cans.
- d. The licensee must not sell a person who is purchasing their second or subsequent alcoholic drink for the day unless the person returns to the licensee the empty can that the person had last consumed.
- e. The licensee must not serve a person more than four drinks in a single transaction.
- f. The licensee must display the National Health and Medical Research Council Australian guidelines to reduce health risks from drinking alcohol at the premises in appropriate language.
- g. The licensee must not provide persons with credit by lending them money.
- h. The licensee must establish and maintain a list of persons prohibited from entry to the licensed premises (**the banned list**), including the following details for each person on the banned list:
 - i. Name
 - ii. Residential address
 - iii. Period of prohibition
 - iv. Reason for prohibition

- i. The licensee must record on the banned list all persons who:
 - i. the licensee has banned from entering the premises;
 - ii. a police officer has informed the licensee is on the Banned Drinkers Register; or
 - iii. a police officer has informed the licensee is prohibited from entry to the Daly River Inn.
- j. The licensee must not sell, supply or serve liquor to any person who is on the banned list, and must exclude or remove from the premises any person who is on the banned list.
- k. The licensee must make the banned list available upon demand for inspection by a police officer or licensing inspector.
- l. The licensee must exclude or remove from the premises any person who is intoxicated, which means that their speech, balance, coordination or behaviour appears to be noticeably impaired by the consumption of liquor.
- m. The licensee must ban from entering the premises for at least three months any person who is ejected from the premises for being violent, quarrelsome or disorderly.
- n. The licensee must ban from entering the premises for at least three months any person who purchases liquor at the premises which they then supply or attempt to supply to persons who are not on the premises.
- o. At the request of police following, where practicable, consultation with senior members of the community, the licensee must cease the sale of liquor and close the bar during any period of violent, quarrelsome or riotous conduct within the community.
- p. The licensee must provide for persons on the premises cooked hot food free of charge from 18:00 hours to 19:00 hours during each day when the premises are operating.
- q. Within six months of being notified of the varied conditions, the licensee must provide to the Director of Liquor Licensing a plan for the provision of recreational activities, entertainment and additional cooked food at the premises.

- r. Within three months of being notified of the varied conditions, the licensee must install a CCTV system in accordance with the Code of Practice established by the Northern Territory Liquor Commission for CCTV system in licensed premises, and maintain and operate the CCTV system from then on.
- s. Within six months of being notified of the varied conditions, the licensee must provide to the Director of Liquor Licensing a training plan for Board members, including:
 - i. Governance of an incorporated association;
 - ii. Licensee's requirements under the *Liquor Act 2019*;
 - iii. Supervision of manager and staff; and
 - iv. Prevalence and nature of alcohol related harm in the community.

INVITATION TO LICENSEES TO RESPOND

45. In accordance with s 113(2)(c) of the Act, the Commission invites the licensee to submit a response to the proposed variations within 28 days after the date of this notice.

46. The Commission also invites the Director of Liquor Licensing and the Commissioner of Police to submit a response within 28 days of this notice.



Russell Goldflam
CHAIRPERSON
NORTHERN TERRITORY LIQUOR COMMISSION
17 January 2024

On behalf of Commissioners Goldflam, Taylor and Dwyer