

REVIEW OF GROOTE ARCHIPELAGO ALCOHOL MANAGEMENT



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**Report to
Anindilyakwa Land Council
and
Northern Territory Government**

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EXECUTIVE SUMMARY

The *Groote Eylandt and Bickerton Island Alcohol Management Plan* (GEBIAMP) was introduced in 2005. Its central platform was a formal liquor permit system, brought in largely as a consequence of the local Aboriginal people wanting to control access by Anindilyakwa. In 2009 the Anindilyakwa Land Council (ALC) wanted alcohol to only be available to permanent residents of Alyangula or bona fide visitors. For various reasons this policy has not been strictly enforced or observed and the integrity of the system has been questioned from time to time.

This review examined the permit system to see whether changes are needed to ensure its suitability for current circumstances. It also looked at the future needs and wishes of the Anindilyakwa people and the most appropriate alcohol management framework to meet those aspirations.

Two principal methods of data collection were used over two consultation periods (mid-2022 and mid-2023). More than 320 individuals were consulted through interviews and group discussions. This method was mainly employed to obtain the views of Anindilyakwa community members. Additionally, two self-administered computer-based questionnaires were aimed primarily at non-Anindilyakwa people living in and around Alyangula. The first concentrated on identifying strengths of the permit system and possible improvements. It was completed by 160 individuals. The second sought to clarify and refine how Full and Restricted Permits might be applied differentially and the structure and processes involved. This was completed by 60 respondents.

Most survey respondents reported there were few alcohol-related problems on Groote Eylandt. This was attributed to liquor permits, complemented by zero tolerance to alcohol and substance use in the workplace and a blanket ban from all licensed premises for those who breach the system. Permits were considered important for ensuring alcohol is limited to responsible persons, reducing illicit supply, making people accountable and protecting vulnerable Aboriginal people from alcohol-related risks. A minority view regarded permits as discriminatory and undermining personal choice and responsibility. Around two-thirds of respondents did not want permits removed.

There was popular support for extending permits to the accommodation sites just outside the Alyangula town lease. However a distinction was made between Pole 7 which has a permanent housing estate for long-term ALC staff and families and the other Poles that are more geared to temporary accommodation. While supporting all residents at Poles 7, 12 and 13 having permits, there was a preference for short-term residents to have Restricted Permits that allow for on-premises consumption but no takeaway.

There was acknowledgement that Restricted Permits are not without issues, such as heightened risks of excessive drinking and drink driving, greater expenditure and reduced opportunities to socialise and enjoy private relaxation and recreation. These issues, however, were thought to impact more on permanent employees, as workers staying for short periods can regularly leave and are more able to adjust to any temporary inconveniences.

A concern raised about having takeaway alcohol at the Poles is the risk of break-ins and problems subsequently occurring in Aboriginal communities. This risk is currently accentuated at Pole 7 because of houses being unfenced, surrounded by bush, easily accessible by a sealed road and having no regular security patrols. These shortcomings could be countered by more monitoring and additional security features being installed on properties.

The majority of respondents to the 2023 survey (70%) supported future planning to extend permits to workers, visitors and residents as developments are completed at the new s19 lease near Little Paradise. But this support was qualified by not wanting the permits to allow takeaway alcohol due to risks of patrols or incidents stretching limited Police resources, the area being targeted for break-ins, and increasing humbug at the small communities in close proximity.

Without further details about the proposed developments and other services and facilities that will be provided, it would be premature to decide exactly what alcohol regime might be most appropriate. On-premises drinking only is favoured at this stage. The need for permits will be better informed as Liquor License submissions are made and mandated legislated criteria and consultations are addressed. Having specific projects and knowing the prevailing circumstances could change what is considered desirable. Until then, current planning should only contemplate Restricted Permits.

The survey results were equivocal about extending permits to other areas of Groote Eylandt: 48% agreed, 37% explicitly disagreed and 14% were unsure. Support was twice as common among short-term workers than permanent workers (65% and 35% agreed respectively). Analysis suggests the latter are more familiar with the antecedents of the permit system and more mindful of the risks that greater access can pose to the local Aboriginal population. A third of all respondents supported the current permit system expressly to protect communities from harms.

There was little appetite among Anindilyakwa people for alcohol to be allowed on any of the major or satellite Aboriginal communities. This is largely rooted in the past devastation caused by alcohol. It is also reinforced by the health, social and material gains made by communities since banning alcohol and brought into stark focus by the troubles caused when alcohol comes into communities illegally. Many have grown up with restricted access to alcohol being the norm and see no compelling reasons for wanting the situation to change. Some are disinterested in alcohol altogether, while others are content with going to the mainland if they want to drink.

Concerns were raised about alcohol leading to young people being exposed to undesirable role models; lower productivity and employment; distraction from cultural activities and family and community responsibilities; money being diverted from children and family needs; increased break-ins and serious humbug; and greater community disruption and loss of amenity.

While the predominant view was against alcohol in communities, a sizeable minority suggested that Anindilyakwa people living in communities should be able to apply for Restricted Permits that allow for on-premises drinking in Alyangula but no takeaway purchases. Support for this option was predominantly from males living at Umbakumba and Angurugu. They suggested the risks would be minimal due to permits being issued only to responsible individuals and because of Responsible Service of Alcohol practices. Benefits were also predicted to result, including social and wellbeing improvements, increased family savings from not going off-island and being able to attract workers and companies to assist Anindilyakwa to secure their financial future. It was also argued alcohol is an integral part of modern living and needs to be accepted and normalised.

One caveat on this option was that there be access to reliable transport so people can exit Alyangula. While people might be encouraged to plan ahead, access to vehicles is difficult at the best of times. If transport is not available there are increased chances of people sleeping rough or becoming disruptive or menacing in the township and this would require additional enforcement. A solution might be to have a subsidised bus service, provided through the ALC or the licensed premises.

A related issue was people returning to community after drinking. Even among those sympathetic to restricted access there were concerns that drinkers coming back to community might cause disruption, abuse and harm. It was suggested that communities would be better protected by having

alternative accommodation available for permit holders. The costs involved in this solution will depend on the nature of the facility, but it is telling that informants were reluctant to endorse any royalty monies being spent on infrastructure that would actively encourage people to drink.

These contrasting views, and the likely benefits and issues raised by each, are based on speculation about what will happen if greater access was allowed. The true impact could be assessed by a limited trial of Restricted Permits for permanent community residents. It would be implemented under strict conditions and processes so Anindilyakwa people can see for themselves the immediate impact of any changes. This will allow them to make a more informed decision about future alcohol management.

The trial could also begin to facilitate community involvement in identifying people to be fit and trusted to obtain a permit. Based on their intimate knowledge of community dynamics and appreciation of individual community members and their propensity to manage alcohol responsibly, it might be assumed that community has reasonable expectations about who should or should not qualify for a permit. A community-based Panel to vet local applications could be established and develop guidelines to assess who might have access to alcohol with a minimal risk of negative consequences to themselves, family or other community members after drinking. This might be managed by the Community Justice Group (CJG) which has a brief that includes making Groote Archipelago communities more harmonious and safer. This Panel would provide feedback and advice to the Groote Eylandt Liquor Permit Committee (GELPC) which formulates recommendations to the Director of Licensing.

While a trial will clarify the impact of relaxing current restrictions, there are a couple of other matters that could be addressed independently to improve operation of the permit system. One is the lag between applications and approvals and the need for more regular GELPC meetings. Another is the inconvenience caused by having to attend the Police station during limited hours. Both concerns can be addressed by making as much of the application process as possible available online. Two further actions could also help streamline the permit application process: distinguishing functions of the GELPC and a Harm Minimisation Committee (HMC), and delegating decision-making to a local authority.

There is some confusion about who is involved in making recommendations about permits. To clarify and streamline the processes of the GELPC, a more focused Terms of Reference should be developed and a more targeted membership should be engaged. The key function of the GELPC is determining the suitability of an individual to hold a permit. GELPC members should have strong community connections that allow them to make informed decisions about each applicant. It is important that the skills and competencies of other members in the current committee are retained, with a focus on managing a broad strategic and integrated approach to alcohol issues and strategies across communities.

Provisions in the *Liquor Act* allow certain powers and responsibilities to be delegated to local officials. For Groote Eylandt these officers are the IOC of the Police station and, once established, the CEO of the Groote Archipelago Regional Council. Decisions about the approval, revocation or variation of permits could be made by these delegates on condition that they are supported by the GELPC. This has the potential to increase efficiency in the decision-making process, facilitate more timely actions and communications with local people, and ensure the prominence of local input and understandings.

It is suggested too that there be a local Licensing officer based in Nhulunbuy and dedicated to providing administrative and strategic support for alcohol management systems operating in the East Arnhem region – including the Archipelago. This is considered critical for sustaining community involvement, enhancing the capacity for Permit Committees, Liquor Accords and other components

of alcohol management to work as efficiently as possible, and to facilitate greater local input to decision-making processes.

Concerns were raised about secondary supply. To mitigate this issue there were suggestions of introducing greater monitoring of takeaway purchases and mail orders, and placing limits on the type and quantity of packaged alcohol available. However on-selling and secondary supply can occur with small amounts of alcohol as much as with large amounts. Instead effort might be put toward public signage and messaging about its social unacceptability. This could highlight the illegality of the activity, spell out the severe penalties that can result and emphasise that it goes against the expressed wishes of Anindilyakwa people which have emerged from hard lived experience. Similarly, Anindilyakwa people must be reminded they should not be party to illegal supply and be encouraged to report incidents. Clan leaders might devise sanctions for community members found to be involved.

The eligibility of permits for non-Anindilyakwa living in Aboriginal communities was sometimes raised in the context of secondary supply. Generally, however, there was little objection to non-Anindilyakwa having access to Restricted Permits. Cultural differences were recognised and enabling non-Anindilyakwa to socialise with peers at licenced venues in Alyangula was considered acceptable. But this view was underscored by a zero tolerance to secondary supply or bringing alcohol back to community. Any indications of such activities must incur severe penalties.

There is an absence of easily available information about the prevailing alcohol restrictions and the underlying permit system. Induction by different companies varies, with some employees receiving detailed briefings and other workers and visitors being left to find out for themselves what is involved. Some interviewees reported being unable to find out any details prior to arriving and, while many others had a notion that restrictions are in place, they had little knowledge of how the system actually operates.

Advertising the permit system more extensively through official websites, references in tourist materials, public messaging and employer communications could help to address this. Promotion could reiterate responsible drinking practices, promote zero tolerance toward secondary supply, and instruct where more detailed information and advice can be found. Messages should include the reasoning for the permit system being in place, with acknowledgement that it is part of self-determination of the Traditional Owners and borne from experiences still resonating to this day. Explaining the system as respect for community wishes is likely to counter the imposition that some feel.

Consultations revealed broad acceptance that people who want to drink will go off island. While people worry about those who leave for extended periods, this is considered preferable to the trouble that alcohol can bring to the community. It is debatable whether mainland drinking represents the displacement of a Groote Eylandt problem. It is recognised, however, that those people could benefit from effective treatment and relapse prevention when they return. Indeed treatment services were also advocated for other problem behaviours, including cannabis use, gaming and gambling, and anger management. More education about alcohol management and personal development was raised as important for prevention among young people and enabling more responsible and safer alcohol use by others.

It was evident during consultations that profound and ongoing distress and trauma from the earlier impact of alcohol is still pervasive for many. This argues for more dedicated support to aid the social and emotional wellbeing of individuals and for collective healing. Further, given the significance of the permit system for Groote Archipelago communities and the approach taken to alcohol management in the Northern Territory, it would be instructive for the experiences of the older

generations to be documented as a ready account of the climate in which decisions were made and as a reference for people to learn and understand the history involved. Individuals should be encouraged to record their stories in a culturally and personally safe environment.

This review provides a framework for change, but policy decisions ultimately need to be made by community members to ensure the future remains a true reflection of Anindilyakwa wishes and needs. The current system emerged from extensive community discussions and a shared vision of what was wanted. It is now time for similar engagement and decision making. This can occur through a practical demonstration of what results from limited changes being tested for a short period.

LIST OF RECOMMENDATIONS

The current alcohol management regime emerged out of an effort to meet the original wishes of the local Aboriginal population that there be no alcohol sales to any Anindilyakwa person. Permits have been the mechanism to enable this goal to be enforced and for theft and other illegal supply to be reduced. This has been achieved whilst continuing to allow access for key non-Anindilyakwa workers and businesses providing services and wealth generation.

This review has identified some strong views and attitudes about the future of alcohol management. There is general acceptance that alcohol should not be brought into Aboriginal communities across the Archipelago. There is division, however, about the extent that Anindilyakwa people should still be prevented from accessing alcohol. This divide is largely based on potential risks that could arise from eased restrictions, including drink driving accidents, community disruption, family violence and neglect, anti-social behaviour around Alyangula, increased break-ins and more humbug. While some are adamant that these risks will inevitably be realised if access is increased, there are others who are more dismissive on the grounds that permits will only be issued to responsible persons. Of course there are people between these two extremes who are simply unsure.

To break this cycle of speculation and obtain a realistic gauge of the effects that come from changing access, the ALC Board has proposed that a trial be conducted. To maintain a level of stability, modest concessions are suggested and implementation is to occur under strict conditions and processes. The collection and analysis of data is to be completed by an external and independent agent and the nature of the trial will be widely publicised and explained before it happens. This will give all residents a chance to see for themselves the immediate impact of changes without there being a commitment to any long-term variations. Actual benefits and problems will be demonstrated so an informed decision about future alcohol management can be made.

The trial will include Full Permits being available to residents in permanent housing at Pole 7 (see map page . People at the Pole 7 worker camp, or at Pole 7A or any of the other Poles will be eligible for Restricted Permits. So too will permanent residents living elsewhere in the Archipelago. All permits will be subject to the formal application process governed by Licensing.

The recommendations reflect the conduct of a trial and identify several other initiatives that can be undertaken separately.

Number	Issue	Recommendation
1	Trial assessment of amended permit conditions	<p>Under the auspices of the Director of Licensing, conduct a six-month trial of select changes to the current Liquor Permit System.</p> <p>The trial to be overseen by the existing Groote Eylandt Liquor Permit Committee (GELPC). Start date to be determined by the Director of Licensing.</p> <p>Details of the trial to be widely publicised to all residents prior to commencement.</p> <p>The GELPC to organise for appropriate information and feedback to be sourced from relevant stakeholders over the course of the trial. This data to be provided to an independent agent to analyse and prepare a report of trial results.</p> <p>At the end of the trial period the GELPC to assess trial results and provide recommendations. The ALC Board to consider what, if any, changes should continue.</p> <p>In light of results from the trial, an Alcohol Policy Statement to be adopted by ALC Board as a reflection of the needs and wishes of Anindilyakwa people.</p> <p>The ALC Policy and requested permanent changes to the Permit System to be presented to the Director of Licensing for considered action.</p> <p>All or part of the trial may be ceased immediately should there be reasonable grounds brought to the attention of either the ALC Board, the GELPC or Licensing NT.</p>
2	Conditions of the trial	<p>For the duration of the trial:</p> <ul style="list-style-type: none"> • All permanent residents in Alyangula township and at Pole 7 to be eligible to apply for either a Full or Restricted Permit. • The eligibility for Full Permits only applies to permanent residents living within the Pole 7 Permanent Housing area. It does not extend to people living at the ALC workers camp at Pole 7 or the GHAC workers camp at Pole 7A (who may only apply for Restricted Permits), and existing conditions associated with housing or employment agreements are to be maintained. • Permanent residents of the Groote Archipelago living outside of Alyangula and the Permanent Housing area at Pole 7 to be eligible to apply for Restricted Permits. • All new permit applications must be approved by the GELPC. • Representatives of the Community Justice Group (CJG) will advise the GELPC on all Restricted Permit applications from Anindilyakwa community members. • An audit be conducted of existing liquor permits held by people living outside of Alyangula and Poles 7. All legitimate permits to be “grandfathered” until the end of the trial. • Visitors will not be able to apply for Full Permits. • No alcohol to be permitted on any Aboriginal communities.

3	Future s19 developments and alcohol access	<p>The trial will enable people living on the s19 lease developments at Little Paradise to apply for Restricted Permits, but future alcohol management needs for that area must be monitored. Any change to this access should be determined as each part of the development is completed. Each assessment to include consideration of actions that limit negative consequences flowing to neighbouring communities and protect the amenity and safety of the precinct. The views of the local landowners to be paramount.</p> <p>Applications for appropriate liquor licenses to be made in accordance with the Northern Territory <i>Liquor Act 2019</i>, noting sections 47 and 180 in particular.</p>
4	Enabling Anindilyakwa input to permit application processes	<p>The CJG to establish and oversee necessary processes and structures to facilitate Anindilyakwa participation in the management of liquor permits for community members in a safe and confidential manner.</p> <p>This will include:</p> <ul style="list-style-type: none"> Identifying suitable individuals to represent community members on the GELPC and provide relevant commentary to assess whether an application should be supported or not. Members should not have potential conflicts of interest in performing their role. Determining the means by which a fair and informed assessment of individual applications can be formulated. In conjunction with other GELPC members, identify key criteria to be used when assessing applications, noting that consideration will be given to both the circumstances of an individual applicant and potential impact on the safety and amenity of the community. <p>Agreed processes and structures to be included in the GELPC Terms of Reference.</p> <p>Selected representatives to attend the GELPC and present advice and feedback on the appropriateness of Anindilyakwa applicants to hold a Restricted Permit. While that information will be of critical importance, the final recommendation about an application shall be the result of whole of GELPC processes and the final decision about an application will be made by the Director of Licensing.</p>
5	Revise Terms of Reference and membership of the GELPC and establish Harm Minimisation Committee	<p>Review Terms of Reference and membership of the GELPC. The principal function of the GELPC to be determining the suitability of individuals to have access to alcohol and any conditions that might apply to that access. Membership to be limited and only include persons suitably qualified to comment on individual entitlements. Amended Terms of Reference to be adopted.</p> <p>Other existing GELPC members to continue to operate as a Harm Minimisation Committee (HMC), with focus on the strategic development, implementation and monitoring of integrated and complementary alcohol management activities and initiatives</p>

		<p>across the community. Terms of Reference to be developed to define the role of the committee.</p> <p>The HMC to include Anindilyakwa representatives identified by the CJG as suitable to reflect community perspectives and mobilise local capacity. Terms of Reference to include details determined through the CJG to be appropriate for Anindilyakwa engagement and participation.</p> <p>Other stakeholders to be co-opted to the HMC from time to time as necessary to address particular matters.</p>
6	Consideration of potential problems associated with changed permit conditions	<p>An immediate priority of the HMC to be examining potential problems that might emerge with expanded access during the trial. Suitable strategies addressing issues are to be developed and/or implemented, with Anindilyakwa members leading the identification of community-based responses.</p> <p>In lieu of the HMC being fully formed this priority to be addressed by the existing GELPC in partnership with community representatives nominated by the CJC.</p> <p>Deliberations to be taken into account by the Director of Licensing when determining start of trial.</p>
7	Determining alcohol arrangement for Aboriginal visitors	<p>The CJG, through the GELPC, to develop policy about what permit arrangements should apply to Aboriginal visitors who will be staying outside of Alyangula and Pole 7.</p> <p>Policy to be incorporated into trial for evaluation.</p>
8	Delegating to local decision makers	<p>The Director of Liquor Licensing to explore the feasibility of delegating powers and functions related to the permit system to a local authority. Discussions to decide which specific powers and functions will be delegated to enable more local decision-making in the management of permits. The final delegations to be at the discretion of the Director and in accord with the <i>Liquor Act (2019)</i>.</p> <p>Should delegations be vested in a single authority, decisions by that authority are to only be made with the endorsement of the GELPC.</p>
9	Local support from Licensing	<p>Licensing NT to maintain a regional position to provide administrative support, guidance and development of all aspects of alcohol management systems put in place. This includes operations of Permit Committees and other community-based advisory bodies such as the Harm Minimisation Committee. The position to be at a level that allows for collaborative decision-making, the exercise of practical discretion and initiative, and capacity to provide oversight and develop systems so they remain efficient, effective and appropriate to meet community needs. Position to be adequately resourced to perform the duties assigned.</p>

10	Public promotion of permit system to enhance understanding and awareness	<p>Relevant agencies to develop an ongoing suite of public messages, to be targeted especially around the area of Alyangula, the Poles and Little Paradise s19 leases, and consisting of:</p> <ul style="list-style-type: none"> • public signage highlighting the problems of secondary supply and on-selling and what actions individuals should take when such instances occur. • publicly displayed information about how the permit system works, related health and safety messages and the rationale of the system being grounded in the wishes of Anindilyakwa people.
11	Streamlining permit application processes	<p>Licensing NT to enable as much of the Liquor Permit application process as possible to be facilitated online.</p> <p>Website instructions to be maintained accordingly and include reference to all documentation that is to accompany an application.</p> <p>Licensing NT to work with CJG and GELPC to ensure processes allow for efficient and effective engagement of Anindilyakwa people in operation of the permit system.</p>
12	Healing and rehabilitation services	<p>Explore healing programs and services to address the intergenerational trauma and the social and emotional wellbeing of individuals continuing to be impacted negatively by historic alcohol-related experiences.</p> <p>Consider establishing local rehabilitation services to address issues related to alcohol and cannabis abuse, gambling, anger management and other concerns.</p>
13	Documenting antecedents to restrictions	<p>Individuals to be encouraged, within a culturally and personally safe environment, to detail their experiences of how alcohol impacted their lives prior to the introduction of restrictions and after. The documentation to be a permanent and accessible record for all local Anindilyakwa people.</p>

BACKGROUND

Alcohol has been problematic for the Groote Eylandt archipelago since it was introduced in the mid-1960s, when two licensed clubs were established as part of the residential township of Alyangula that serviced a new GEMCO manganese mine in 1964.¹ Over time drinking became a part of life for many of the local Aboriginal people – the Anindilyakwa people. It also brought with it misery and trouble across communities, with escalating levels of crime, social dysfunction and violence.² Because of this, most of Groote Eylandt and all of neighbouring Bickerton Island were declared restricted alcohol areas in June 1980.³

However the negative consequences of alcohol continued, with restricted areas being ignored and large quantities of alcohol being available on Groote Eylandt. In the late 1980s communities moved to further limit alcohol access by deciding that only Anindilyakwa employed by GEMCO or living in Alyangula could become members of either the Alyangula Recreation Club (ARC) or the Alyangula Golf Club (the only licensed sources of alcohol).⁴

This initiative delivered some relief to the communities, but alcohol was still obtained by community members living outside Alyangula. There was secondary supply by Alyangula residents and visiting contractors, there was coercive supply from Aboriginal residents having to meet cultural obligations to relatives, and there was the theft of alcohol stocks from houses and outlets. Alcohol was brought back to communities for consumption or it was drunk elsewhere and the harmful effects of intoxication were often inflicted on family and others living on community. Communities were wracked by disturbances, fights, abuse and sometimes death.

To address this situation, a voluntary limit was placed on the takeaway purchases made by Anindilyakwa living in Alyangula. This was to protect the residents from humbug and to stem the amount of alcohol finding its way into communities. The strategy was devised by GEMCO, the Anindilyakwa Land Council (ALC), Police and individual employees.⁵

While this arrangement was partially successful, illicit alcohol was still prevalent and alcohol-related harms continued to impact communities. There were also growing legal concerns about the imposition of limits being discriminatory. By May 2004 the system was virtually abandoned.

¹ Clough, A. No alcohol beyond this point: Restricted areas in the Top End. *Of Substance*, 2006, 4 (2), 10-11

² Amagula, N., Djerrkura, G., Lanhupuy, W., Wurrawilya, P., Wurrawilya, M., Wurramara, D., Bara, P., Wurawilya, R., Yantarnga, H. and Mamarika, R. *Report of the Groote Eylandt Aboriginal Task Force*. Angurugu, 1985

³ Aboriginal & Torres Strait Islander Social Justice Commissioner. *Social Justice Report 2007*. Sydney, Human Rights and Equal Opportunity Commission, 2008.

⁴ Conigrave, K., Proude, E. and d'Abbs, P., *Evaluation of the Groote Eylandt and Bickerton Island Alcohol Management System*, A report produced for the Department of Justice, Northern Territory Government, July, 2007, p15.

⁵ Aboriginal & Torres Strait Islander Social Justice Commissioner. *Social Justice Report 2007*. Sydney, Human Rights and Equal Opportunity Commission, 2008.

In 2005 a formal permit system was agreed and implemented: the *Groote Eylandt and Bickerton Island Alcohol Management Plan* (GEBIAMP). The Plan involved permits being issued by the Licensing Commission to anyone wanting to buy or consume takeaway alcohol. To purchase takeaway a person had to be a financial member of one of the two liquor outlets in Alyangula. At the same time, the Licensing Commission also expanded the restricted areas around Umbakumba and Angurugu and areas within Alyangula. The two licensed outlets in Alyangula were exempt and permit holders were able to consume alcohol on those premises.⁶

Residents of Umbakumba were initially allowed to apply for permits to buy beer for consumption at designated community locations. However, as illegal supplies persisted and the permit system was abused in various ways, the Community Council eventually determined that no one in Umbakumba would be permitted to drink, regardless of the rights they may still possess under the GEBIAMP.⁷

In Angurugu residents were initially able to apply for permits, but no alcohol was to be brought into the community. Consumption could only occur legally at the Alyangula licensed premises. The community subsequently tightened access further by not supporting permits being issued to any residents.⁸

By 2006 alcohol was prohibited in all Aboriginal communities. This was reflected in the expressed policy position of the ALC: "alcohol for consumption both on and off any licensed premises should only be available to permanent residents of Alyangula or bona fide visitors.....The reason for the policy is our awareness of the harmful impact of alcohol on other communities. We want our policy applied geographically regardless of race etc".⁹

Despite this policy, access to licensed premises by non-Alyangula residents persisted. Some people retained their "permits" after moving out of Alyangula without notifying a change of address. Others, possibly to ease the sudden cessation of alcohol to communities, were partially exempt by virtue of endorsed letters that provided for on-premises consumption but no takeaway. This measure was particularly aimed at professional non- Anindilyakwa service providers who lived in communities (e.g. teachers, health staff), but a number of

⁶ See Northern Territory Licensing Commission. *Applicant for Declaration of a Restricted Area*, Decision: 11 May 2005. Section 80 of the Decision states "the holder of a liquor permit may possess and consume liquor in the Groote Eylandt restricted area only within those areas of land delineated in the Schedule to this decision and in those areas approved by the Commission from time to time". Section 81 specifies that "the declaration of the...restricted area does not apply at the licensed premises of the Alyangula Recreation Club and the Alyangula Golf Club". A later Decision also includes the Lodge – see Northern Territory Licensing Commission. *Application for Revocations and Re-declaration of Groote Eylandt Restricted Area Removing Dugong Beach Resort from Restricted Area, Application for a Liquor Licence for Dugong Beach Resort, and Clarification of Conditions*, Decision, 20 December, 2007.

⁷ Aboriginal & Torres Strait Islander Social Justice Commissioner. *Social Justice Report 2007*. Sydney, Human Rights and Equal Opportunity Commission, 2008.

⁸ dÁbbs, P., Martin, D. and Chenhall, R. *Kakadu/West Arnhem Management Plan Project: Revised Final Report*. Cairns; James Cook University, 2008

⁹ Letter from Chairman of ALC to Alyangula Recreation Club dated 20 August 2009

Anindilyakwa also managed to secure this same access and they continue to do so.¹⁰ There is a lack of documentation to explain why some Anindilyakwa people living outside of Alyangula qualified for this exemption while others did not.

While many of the early permits would have expired with time, the exemption permits have proven problematic. There has never been any legislative requirement for anyone in the NT to have a liquor permit issued by Licensing NT to drink on-premises. The arrangements on Groote Eylandt emerged from pragmatic and mutual understandings between Licensing officials, licensed premises and members of the local population. Moreover, those exemptions were not in a prescribed form of authority and no formal records were kept about who they were issued to or any conditions that applied.

This situation was recently rectified, with Licensing NT issuing a newly prescribed form of permit with a condition that excludes the purchase of takeaway. Because of conditions imposed by the licensed premises, these new permits qualify people to consume on the premises of the ARC, the Golf Club or the Lodge.¹¹ The previous exemptions are no longer valid and people can apply instead for a liquor permit with restricted takeaway conditions.

Groote Eylandt and Milyakburra were declared a General Restricted Area in 2008.¹² Four small areas were initially exempt, but these were revoked in 2011 as part of the Commonwealth Government's Emergency Intervention.¹³ In 2014 the NT Licensing Commission again exempted select areas within the GRA to allow permit holders or guests to consume alcohol during certain times: an area near the squash courts, a residential area known as the GEMCO Directors' Cottages and the Alyangula Golf course.¹⁴

An evaluation undertaken shortly after introduction of the permit regime was published in 2007.¹⁵ It collected community feedback and examined existing databases to compare circumstances prevailing in the periods before and after introduction of the GEBIAMP.

The evaluation noted a range of positive outcomes, especially for the Aboriginal population. Improvements in community harmony and productivity were reported, along with accounts of women and children feeling safer, less alcohol making its way into communities, more people working or on CDEP and Aboriginal residents of Alyangula being less subject to

¹⁰ Minutes of the Alyangula Liquor Permits Committee, 14 July 2021, noted that "the Chair of the ALC requested any Warnumamalya applicants, be sent to him, for further consideration".

¹¹ The ARC liquor license requires a valid liquor permit for a person to gain access, conditions of the Lodge liquor licence only allow alcohol service to locals who hold a valid permit and bona fide guests, and the Constitution of the Golf Club requires all adult members to hold a valid liquor permit.

¹² NT Government Gazette, No. G2, 16 January 2008, page 11.

¹³ NT Government Gazette, No. S54, 21 September 2011.

¹⁴ Northern Territory Licensing Commission. *Application for Public Restricted Area, Groote Eylandt*, Decision: 28 August 2014. There are no records of the decision being enacted, although local understanding is that the cottages and golf course allow for public drinking.

¹⁵ Conigrave, K., Proude, E. and d'Abbs, P., Evaluation of the Groote Eylandt and Bickerton Island Alcohol Management System. A report produced for the Department of Justice, Northern Territory Government. July, 2007

harassment for alcohol. These observations were consistent with quantitative indicators showing fewer assaults, less property offences, reduced numbers of Protective Custody Orders and alcohol-related apprehensions by Police, a lower rate of imprisonment and conditional liberty orders, and a lower absentee rate among Aboriginal employees at GEMCO.

Other reports highlighted a qualitative change in community culture, shifting from alcohol consumption and violence to more traditional and family-oriented activities. There was also more focus given to long term goals like gaining employment and wanting children to be better educated.¹⁶

Some unintended consequences were also noted. One major effect was an increased use of cannabis and its association with violence. Cannabis replaced alcohol as the most common reason for people getting agitated, particularly when supplies were scarce or when money was needed for payments. Another major change was people moving off the island to drink and the number ending up staying away permanently or “living rough” in places like Darwin and Gove. This was considered a choice by the people who wanted to drink and not a problem for the wider community.

In terms of process, the evaluation highlighted the importance of engaging all stakeholders and instilling a sense of local ownership during development of the Plan. Formulation of the Plan was underpinned by extensive consultation and negotiation between Government, service agencies, employers and local community members. Anindilyakwa were engaged through whole-of-community meetings and effective representation in discussion and development groups. The evaluation acknowledged too that this engagement was especially driven by women who had to persevere over several years to regain the respect and cultural authority they had lost over previous decade of social dysfunction. This enabled them to work more equitably and cooperatively with the men who gradually accepted and supported the need for change. For its part, Government recognised and accorded local community and cultural dynamics prime consideration. Businesses and service agencies also actively contributed to the Plan so it could be consistently reinforced and implemented. This united approach ensured all stakeholders were invested in making the system work and this has been key to maintaining the Plan over time.¹⁷

The evaluation made 25 recommendations related to the composition and effective operation of the GELPC; community awareness and understanding of the system and its operations; enhanced enforcement by aviation operators and the barge company; practicalities about the issuing of permits; and ongoing monitoring and assessment. Some of the recommendations have been acted on and others have not.

¹⁶ Aboriginal & Torres Strait Islander Social Justice Commissioner. Social Justice Report 2007. Sydney, Human Rights and Equal Opportunity Commission, 2008.

¹⁷ Aboriginal & Torres Strait Islander Social Justice Commissioner. Social Justice Report 2007. Sydney, Human Rights and Equal Opportunity Commission, 2008.

It is within this framework that the ALC and Northern Territory Government (NTG) have sought to review the permit system and assess its appropriateness as an alcohol management tool for the Groote Archipelago. This review has two components. The first focused on the structure and processes of the permit system, specifically looking at:

1. The tiered approach to restrictions.
2. The nature of the restrictions placed on takeaway purchases and licensed premises and who they affect.
3. Opportunities for greater local decision making about permit matters including a review of the current permit committees and arrangements.
4. Other issues related to permits and local alcohol management.
5. Proposed amendments to the current system to address inconsistencies and identified issues.

The second part of the review focused on identifying alcohol management options that will support the future wants and needs of the various Aboriginal communities of the archipelago. It specifically sought insights from Anindilyakwa people living in the communities of Angurugu, Umbakumba and Milyakburra, and the satellite communities of Four Mile, Bartalumba, Malkala and Little Paradise. This part of the review aimed to:

1. Examine community views on the current approach to local alcohol management.
2. Examine community views on having a prohibition on alcohol, allowing some regulated access to alcohol or having no restrictions on alcohol in the future; and, on other options for the local management of alcohol.
3. Examine community views on the preferred approach to alcohol management in community and how adjustments can be made to the current system to achieve that.
4. Identify what else residents need to make informed decisions about alcohol management in their communities.
5. Outline proposed approaches to alcohol management to reflect the preferred options of each community and recommend strategies for implementation of those options.

METHOD

Community input was gathered over the course of two consultation periods: 28 July to 30 August 2022 and 31 May to 3 July 2023. Two methods were used to collect information during these periods: interviews and computer-based surveys.

CONSULTATIONS

The principal means of obtaining details about the operation of the permit system and to particularly gauge the perceptions and opinions of the Anindilyakwa was via individual and group interviews and discussions, and community meetings. Some interviews were conducted by telephone but the vast majority were face-to-face. The community meetings and some of the group meetings were conducted with the aid of the Aboriginal Interpreter Service. With other consultations there was always a local resident able to act as an interpreter to facilitate the flow of conversation.

Interviewees were identified by STRATEGIC DIMENSIONS or recommended by the Community Support Program (CSP) of the ALC. There were also sessions initiated by the interviewees themselves or which snowballed from referrals made after an interview was completed. Participants were told the purpose of the interview and how disclosed information would be managed. Their anonymity was assured. All participants volunteered their time and comments.

The questions asked at each interview or consultation depended on the perspective being offered by those involved, with more focus given to matters they had specific knowledge or experience of. Sessions were conducted in a conversational style, and responses were followed up as appropriate. A conscious effort was made in group settings to ensure all participants had a chance to contribute throughout the consultation.

Written submissions were received from three stakeholders and the Strong Women submitted a video. In 2022, community meetings were held at Milyakburra, Angurugu and Umbakumba and with senior members at the satellite communities of Bartalumba Bay, Malkala, Four Mile and Little Paradise. In 2023, meetings were again conducted in Angurugu, Umbakumba and Bartalumba Bay.¹⁸

More than 221 individuals participated in the 2022 consultations. Nine out of ten (91.7%) were Indigenous and the vast majority of those were Anindilyakwa people. In 2023 there were 107 participants and 80% were Indigenous.

¹⁸ Milyakburra and Malkala declined being consulted a second time, indicating they had previously made clear what their views were. This was also the case with the Angurugu Men's Shed. Other 2023 consultations, including a cancelled session with residents of Little Paradise, were affected by three deaths that occurred during the time available.

SURVEYS

The surveys were self-administered and could only be accessed once from any computer IP address. Each survey was open for completion over a period of several weeks. The questionnaires were primarily targeted at people living in Alyangula or at the Poles just outside the town lease. It was developed in consultation with representatives of the ALC and NTG. The 2022 version was designed as the primary source for assessing the practical operation of the permit system and its expansion immediately outside Alyangula. The 2023 version sought to clarify and refine information about the differential use of Restricted and Full Permits and related processes and issues.

Both surveys were promoted online through *Community News* and local social media sites, as well as posters displayed at licensed premises and common areas around Alyangula. Through a snow-balling technique, the surveys were also promoted to non-Anindilyakwa living in communities.

Prior to the second survey, two documents were available for people to be more fully informed about the questions being asked in the survey. These were a *Discussion Paper* of key issues and an *Interim Report* of findings and proposals from the first round of consultations. Approximately one in four respondents (38%) indicated they had read the Discussion Paper and the same number reported reading the Interim Report. Close to a quarter (23%) reported not reading either.

Not all respondents answered all questions. Analysis and reported results are based on the number of respondents who provided valid responses to the pertinent question.

LIMITATIONS

The review was dependent on the nature and quality of the information made available for consideration. Various strategies and procedures were employed to secure a comprehensive range of data and a reasonable number and cross-section of stakeholders so confidence could be placed in the validity of the findings. However, no claims of representativeness can be made.

Generalisations from the surveys are limited by factors that might have excluded individuals from participating and the characteristics of the eventual sample obtained. As the surveys relied on self-report, responses were not open to verification. However, the surveys were conducted professionally and according to acceptable practices. On that basis they provide a reasonable snapshot of perceptions from a sizable proportion of the targeted community. Further, the survey instruments were pre-tested to ensure understanding and engagement, access was enabled over extended timelines and they were widely promoted.

The consultations were similarly affected by competing factors that could have prevented people from participating at the times when interviews could take place. Some compensation was provided by allowing consultations to be conducted remotely and at different times. This flexibility facilitated equity of access and encouraged a reasonable cross-section of perspectives to be interrogated. Interviewees demonstrated their commitment to the review by volunteering their participation and disclosures, but their integrity can only be assumed. While the interview process allowed for the reliability of responses to be gauged, validity was less open to assessment. These different considerations necessarily caution the conclusions made.

These methodological limitations qualify the findings as being derived from a particular set of information sources. They do not dismiss the accuracy or relevance of the findings.

FINDINGS & DISCUSSION

ALYANGULA¹⁹

Figure 1 shows the majority of 2022 survey respondents thought Groote Eylandt has few alcohol-related issues or problems. Nonetheless, comments did acknowledge that incidents do occur occasionally - most notably as break-ins and fighting (29%) and alcohol getting back to communities and causing disruption (19%). One in five comments (19%) referred to there being a significant level of serious alcohol-related problems among residents of Alyangula going unreported/hidden.²⁰

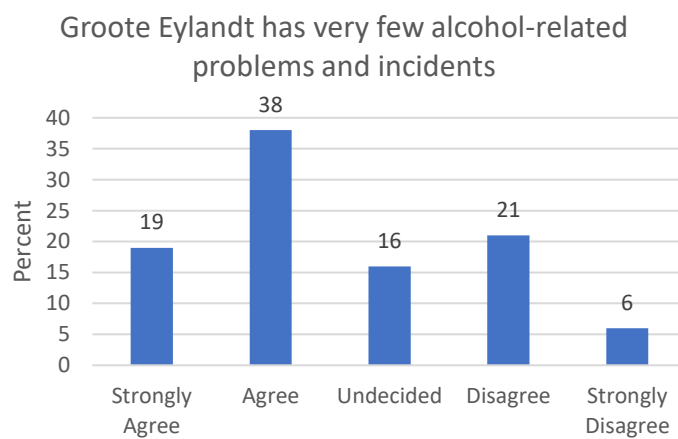


Figure 1 – Prevalence of Alcohol Problems and Issues

As shown in Figure 2, permits were explicitly identified by 60% as a major factor in preventing excessive drinking and related problems. Two other contributing factors raised by respondents were zero tolerance to alcohol and substance use in the workplace and the blanket ban imposed by all licensed venues for anyone who breaches the conditions of their permits.

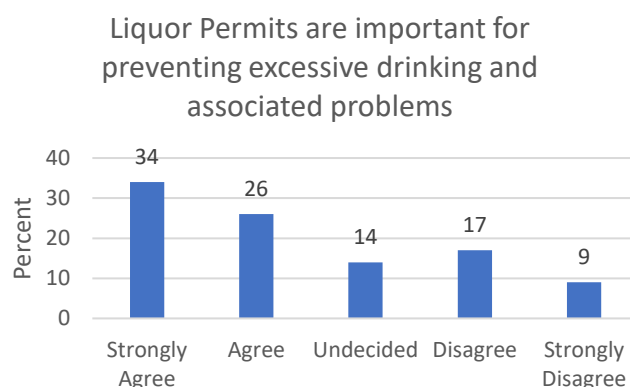


Figure 2 – Liquor Permits for Preventing Problems

¹⁹ Data presented in this section is derived from the 2022 survey.

²⁰ Comments were made by 31 respondents.

Whilst 35% of comments described permits as a proven method for controlling alcohol-related harms, 40% argued that permits could be even more effective if they limited how much alcohol can be purchased.²¹ One in five asserted it should be the responsibility of each person to manage his or her own consumption and behaviour. While there is a view that personal responsibility and accountability should be the key to alcohol management, Figure 3 shows 35% agreed and 51% disagreed when asked specifically whether permits should be removed in preference to people taking full responsibility for themselves.

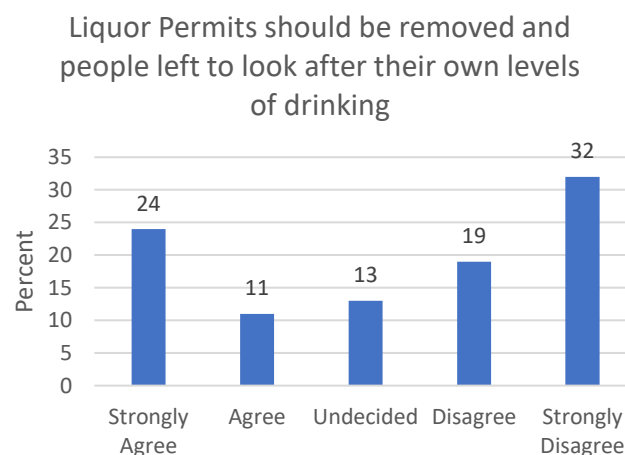


Figure 3 – Removal of Liquor Permit System

When asked explicitly to comment on the current permit system, 113 respondents provided detailed feedback. The majority (62%) reported that the system was effective for controlling excessive drinking and keeping people safe. They argued that permits ensure access to alcohol is limited to responsible persons only, that they reduce unlawful supplies coming onshore, they hold people accountable and, by virtue of not being widely available to Anindilyakwa people, they protect vulnerable Aboriginal people from alcohol-related risks. A minority, however, considered permits to be discriminatory (11%) - either to Aboriginal people or people living outside Alyangula – or an unnecessary imposition on personal freedom (5%).

Several respondents raised concerns about non-drinkers being required to obtain a permit if they wanted to simply socialise or dine at the ARC or Golf Club. They reported that some people have personal reasons for not wanting to have a record of a permit application. Having a formal association with alcohol is anathema to them. This attitude, however, is an independent choice made by only a few in the community. As such it does not warrant the creation of a separate system to monitor patrons once they have entered premises. It would overly complicate demands on venues to rigorously distinguish patrons who can consume

²¹ Comments were made by 20 respondents.

from those who cannot. The people affected must accept it is their personal choice and part of choosing to live on Groote Eylandt in line with the wishes of Anindilyakwa people.²²

THE POLES

The accommodation footprint around Alyangula has expanded, primarily for business reasons. This expansion has occurred in close proximity to the South32 lease, with the furthest Pole only 2.5kms from the centre of the township. The Poles are not significantly closer than Alyangula itself to any of the Aboriginal communities.

Survey responses obtained in 2022 showed considerable popular support for permits being extended to Poles 7, 11, 12 and 13, with 67% agreeing and only 12% disagreeing. These results are shown in Figure 4.

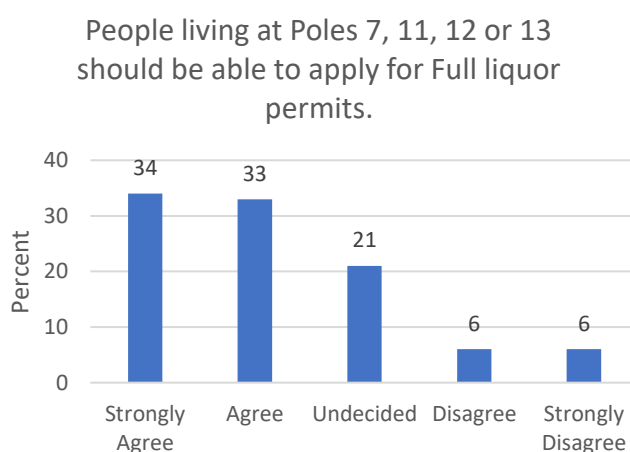


Figure 4 – Extending Full Permits to Poles

Allowing greater alcohol access was considered important to address a variety of issues that are currently experienced.²³ One in ten respondents complained that lack of takeaway deprives people of ever being able to drink in private, that the social nature of a club environment heightens the risks of excessive drinking and drink driving, that on premise drinks are more expensive, that it curtails their enjoyment of recreational activities (e.g. being able to have a drink while fishing or playing a round of golf) and their ability to fully relax and unwind. Others reported that it inhibits home entertaining and, especially for those with partners and children, it can impact on family time and enjoying their leisure together.

²² Some leeway is provided for. The ARC allows a brief period of grace to newly arrived permanent GEMCO workers who may be awaiting a permit. Access is denied beyond that period if a permit has not been obtained. It also allows temporary GEMCO contractors on the island for less than three months to have access as bona fide visitors who must show their room keys. Contractors staying longer are expected to obtain a Full Liquor Permit. The Golf Club allows a member to sign in a guest, but only once – thereafter the guest must have a permit. Persons under 18 are not required to have permits at any venues as they are underage and cannot be served. At the Lodge a person need only be with a person with permit.

²³ Comments were made by 113 respondents when explicitly asked what they think about the restrictions currently placed on people living outside Alyangula.

While these concerns might relate to all people living at the Poles, it is arguable that they are more impactful on permanent residents. For employees who are only staying for short periods at a time, these issues are more likely to be temporary inconveniences. Time off the island gives them opportunities not afforded to those who are limited in being able to leave.

This distinction might also explain 2023 survey results that showed respondents differentiated the type of permits considered appropriate for permanent residents (i.e. people with a permanent and verifiable Groote Eylandt residential address) versus visitors (i.e. anyone else). Restricted Permits were the most supported (69%) option for visitors and Full Permits for permanent residents (82%).

In this context it is notable that the Poles vary in who they primarily cater for. Pole 7 is largely a permanent housing estate for long-term ALC staff and families. This contrasts with the temporary accommodation co-located at Pole 7 for visiting officers and workers, the adjacent work camp at Pole 7A for the Groote Holdings Aboriginal Corporation (GHAC) and the living quarters available at the other Poles. Pole 11 is a commercial laydown and storage site and there are no intentions to provide any accommodation. Pole 12 is the site of the ALC workhouse. It has accommodation for short-stay workers. The Groote Eylandt and Bickerton Island Enterprises (GEBIE) has limited temporary accommodation at Pole 13 which is leased by GEMCO for its workers. There is also limited housing for the ALC Rangers program.



Diagram 1
Comparative streetscapes at Pole 7 (left) and Pole 13 (right)

The ALC has argued for permanent Pole 7 residents to be allowed Full Permits as a way of retaining staff. It is claimed that senior staff turnover has been high and that one of the reasons for this has been the social isolation that can result from not having access to alcohol. Permit requirements segregate Alyangula and Pole 7, denying permanent Pole 7 residents opportunities to fully participate in the social and leisure milieu of Alyangula or enhance their domestic relaxation and entertaining to what it used to be before arriving on the island.

A significant concern about having takeaway alcohol at the Poles is the risk of break-ins and problems subsequently occurring in Aboriginal communities.²⁴ This potential risk is heightened at Pole 7 because of the houses being bounded by bush and easily accessible by a sealed road, and there are no regular security patrols. Addressing these features could reduce the risk of offending. Other precautions could also be taken such as requiring secure storage be a part of any housing agreement, making occupancy conditional on employment or ensuring compliance with any corporate policies about alcohol and the workplace. Additional security equipment might also be installed in houses (e.g. CCTV, double-locks). To ensure the amenity and safety of all residents, rules of conduct could be established to minimise disruption and noise.

Residents having greater access to alcohol at Pole 7 could increase alcohol-related humbug and demands from Anindilyakwa because of their association with the ALC. With the ALC *raison d'être* being to benefit and support the local population, there could be expectations that Pole 7 residents will be more obliged to meet requests made of them by locals. This would be especially so if the residents are Anindilyakwa and observe the norms of obligation that operate within Aboriginal culture.²⁵

These potential risks arising from alcohol access at Pole 7 are speculative. They are also open to amelioration through the identification of suitable strategies and initiatives. At present the practical impact of risk factors and their containment cannot be known. Conducting a trial of Full Permits for permanent residents is a way to realistically discover the nature and extent of problems that emerge and to test measures that will discourage break-ins and thefts, prevent harassment and reduce alcohol getting into Aboriginal communities to be practically tested. A trial that demonstrates problems can be effectively managed would give significant confidence that the benefit to be derived (i.e. residents more able to engage in Alyangula-based activities and occasions) will not be at the cost of more harms and trouble. The outcomes would be transparent and provide clear grounds for deciding whether to extend Full Permit access to permanent residents at Pole 7.

It is not suggested that this proposal include other Poles or individuals living at the workers camps at Pole 7 and 7A for now. Restricted Permits should remain the only option for people at those locations. This will help ensure changes to the system are controlled and incremental so disruption is minimised.

²⁴ Data received from NT Police on 7/7/23 and 1/8/23 show there were 134 residential break-ins on Groote Eylandt from June 2018 to May 2023. A third (31.3%) were alcohol-related and nearly all of those (97.6%) were linked to Alyangula where alcohol can be stored at residences. The data was qualified by the alcohol-related figures likely to be under-estimated due to procedural complications in record keeping.

²⁵ It was reported that only one resident is Anindilyakwa – a senior male. There is no indication how this number may change in the future.



Diagram 2

Facilities at Poles 7 and 7A (permanent housing areas highlighted)

ANGURUGU, UMBAKUMBA & SATELLITE COMMUNITIES

Figure 5 shows that extending Full Permits to all residents of Groote Eylandt was supported by just under half of the 2022 respondents (48%), with another 37% explicitly disagreeing and 14% being unsure.

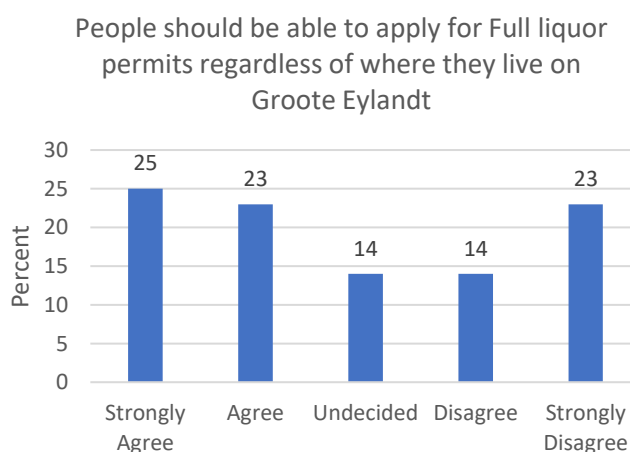


Figure 5 – Extending Full Permits To All Groote Eylandt Residents

This result varied significantly according to whether respondents were permanently based on Groote Eylandt or FIFO workers.²⁶ This divergence is vividly illustrated by Figure 6. Nearly twice as many FIFO workers agreed (65% versus 35%), whilst close to three times as many permanent workers disagreed (53% versus 19%). This suggests a degree of “self-interest” among those currently with limited access.

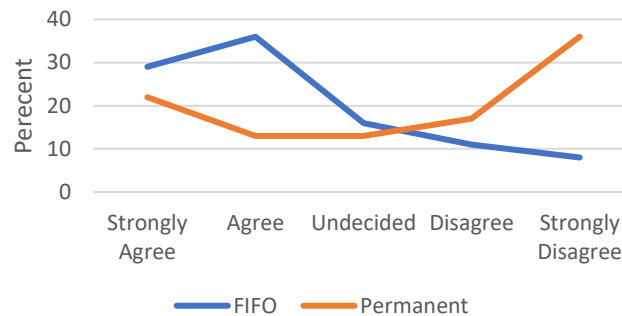


Figure 6 – Agreement to Extend Permits Beyond Poles by Employment Type

An examination of associated commentary suggests permanent workers are more familiar with the antecedents of the permit system and more mindful of the risks that alcohol can present to the local Aboriginal population.²⁷ Three in ten respondents (29%) highlighted the harms and damage that can occur on Aboriginal communities when alcohol is available. As an adjunct to this, 19% indicated that Aboriginal communities need to decide for themselves whether permits should be more widely allowed. From the more general comments made about limited access, the most common (31%) supported the system for protecting Aboriginal communities from being exposed to harmful risks associated with alcohol (i.e. fighting, domestic violence, family disruption, drink driving). Another 17% endorsed the system as an effective way of controlling consumption on the islands and maintaining safe and harmonious living and working conditions. One in twenty recognised that the system meets the wishes of the Traditional Owners.

The majority of respondents (79%) in the 2023 survey endorsed Anindilyakwa only being able to apply for Restricted Permits that prohibit takeaway alcohol being taken into communities. A range of benefits were expected to result, including less break-ins, greater cross-cultural engagement, the gradual normalisation of drinking and exposure to models of good behaviour. On the other hand, associated comments were still wary about alcohol having a dramatic negative impact on communities (29%) and recognised that any decision needs to be made by Anindilyakwa people (29%). Suggestions were also made that applications should be vetted and limits placed on the amounts of alcohol that can be consumed.

²⁶ Average agreement ratings were subject to Mann-Whitney tests for independent samples. Ratings closer to 1 indicate stronger agreement. The mean ratings for people living in Alyangula was 3.04 and for those living outside Alyangula it was 2.61. The difference was non-significant ($p=.094$). The average ratings for Permanent and FIFO employees were 3.32 and 2.34 respectively and the difference was significant ($p<.001$).

²⁷ Comments from 31 respondents about allowing Full Permits across the Archipelago and more generally from 113 respondents who were asked their thoughts about residents outside Alyangula only having Restricted Permits.

Consultations with Anindilyakwa themselves indicated little support for alcohol being available in any of the major or satellite communities. This is largely rooted in the devastation caused by alcohol in the past. For many this is a living history, with consultations triggering painful memories of trauma and fears and raising unresolved personal and family issues. This was particularly prevalent among older women, but it was also evident among men who have reflected on their past behaviour and the distress and anguish it inflicted on their families.

While some pointed out that younger generations are bearing alcohol prohibition as the legacy of a past they were not part of, many young women and men still agreed with alcohol being banned. Some had heard stories of the past from family and are cautious and fearful of events being repeated. Their attitude was also partly borne out of respect for the ongoing memories of what family members lived through. As one woman spoke at a community meeting: *"maybe third or fourth generation can change, but still not good for people now who grew up with it"*.

Allowing alcohol in communities was seen as risking young people being exposed to undesirable role models who centre their lives around alcohol. Alcohol was thought to encourage laziness, lead to "work sick" and foster disengagement from cultural, family and community activities and responsibilities. Other worries were the threat of more money being diverted from children and family needs, increased break-ins and serious humbug, greater community disruption and violence, and loss of amenity and security.

It was evident from consultations that many Anindilyakwa simply accept that alcohol is not part of their everyday lives. Younger people especially have grown up without alcohol being readily available and cannot find compelling reasons for wanting this situation to change. Others have adjusted as needed - some are disinterested in alcohol altogether while others are content with the option of going to the mainland to consume.

The current regime is also reinforced by the many advances made since restrictions were introduced. Interviewees attributed a range of positive outcomes to the absence of alcohol, including increased school attendance, better care and parenting of children, greater community safety and security, individuals more reliable in meeting their family, work and community responsibilities, and better overall health. Even with these gains, as the Strong Women stated: *"We are already struggling and don't need to make our hardships worse by 'going in reverse' to earlier times"*.²⁸

The trouble that occurs when alcohol is illegally brought into communities is a continuing reminder of the damage that can occur. Such occasions are disruptive to the peace and quiet of communities with arguments, abuse and violence common. Outbreaks can fuel long-term

²⁸ Letter from Groote Eylandt and Millyakburra Strong Women's Group to Director General Licensing NT, May 2022

feuds, spark property damage and personal assaults, and send people fleeing from their homes and looking for refuge.

In lieu of alcohol coming into communities, there was a substantial minority view among Anindilyakwa that some community members should be able to apply for Restricted Permits so they can at least drink on premises at the three licensed venues in Alyangula. Support for this option was predominantly from males living at Umbakumba and Angurugu.

It was argued that some relaxation of current restrictions would deliver various benefits for individuals: as a sociable activity drinking is a way of strengthening bonds with friends and workmates; there is the enjoyment in the pleasurable effects experienced by the drinker; drinking provides a way of easing or escaping stresses; and, drinking locally stops people having to spend a lot of money and leave family to go offshore to drink. Collective benefits were also mentioned, centred on alcohol being an integral part of modern living and that consumption needs to be accepted and normalised. The current restrictions are seen as creating an artificial environment that does not aid Anindilyakwa moving in and out of contemporary society on the mainland. Part of that society involves economic development and alcohol was considered important for attracting workers and companies to assist the Archipelago residents to secure their financial future. Limiting alcohol was seen to be holding the Anindilyakwa back from developing their place and identity in the modern world.

Several practical concerns were raised by both Anindilyakwa and survey respondents that make the extension of Restricted Permits problematic. While the issues are relevant to anyone who drinks at licensed premises, they are accentuated for Groote Eylandt communities because of the distances involved, the lack of infrastructure and strong community leaders, and the limited exposure people have had over some decades to any kind of regular drinking culture.²⁹

Community safety was the major concern identified by people. Even among those who were sympathetic to people being able to drink in Alyangula, there was strong opposition to drinkers returning to community because of the disruptive, abusive and harmful risks they pose. While there are Anindilyakwa living outside Alyangula who have been drinking on-premises for some years without incident, the potential for problems to arise was paramount. As one interviewee noted: *“Don’t want grog or drunks back in community. Small amounts of alcohol are enough to turn good men bad”*.

Compliance with the Responsible Service of Alcohol by licensed premises was often identified as the way to mitigate this risk, but these practices cannot guarantee against personal triggers for irresponsible and dangerous behaviour. For different individuals and at different times, alcohol can heighten a person’s sensitivities, memories and suspicions, and lower

²⁹ A consistent comment was that Anindilyakwa have a lower tolerance for alcohol due to limited experience and that drinkers quickly “get the taste” which drives them to drink more and more. Such comments were predominantly by male Anindilyakwa drinkers.

disinhibitions which can escalate unacceptable behaviour. The risk of this occurring is not one that many Anindilyakwa are keen to embrace. Some might consider people with a long history of responsible and accountable behaviour as low-risk, but for others any level of risk is regarded as intolerable.

Providing safeguards against this risk would build confidence for allowing greater access. This could be done partly by community input to the permit application process. Community members could be more involved in identifying people who are known to maintain a consistently responsible disposition and would be tolerated by family to return to their homes after drinking. The chances of trouble would be reduced by selecting only applicants with a proven record of good behaviour.

Other more tangible and responsive measures were suggested, including: putting limits the amount and type of alcohol that can be consumed³⁰; having permanent Police presence in communities³¹; a more active and interventionist Night Patrol; provision of a place where drinkers can sober up, or a Safe House for families who may need emergency refuge. Another suggestion for preparing young people in particular for responsible adulthood came from a large discussion group of men. It centred on older men taking on a mentoring role that would nurture more connection to Culture, family and community, build strong self-esteem, confidence and resilience, and develop a committed work ethic and appreciation for the productive use of leisure time.

A second concern was where to place people if they cannot return home after drinking. If people cannot go home there are increased chances of them sleeping rough, or worse, becoming disruptive or menacing around Alyangula. The most common solution suggested for this was to provide a dedicated safe place. This might be anything from an area with minimal amenities through to a purpose-built facility. Experience in other parts of the Territory indicate the cost and security issues involved in such spaces can be prohibitive.³² To minimise disruption it would ideally be close to premises, but there is no ready land available. There is also the matter of how the space would be funded and who would manage it – and it was telling in this regard that community members were reluctant to endorse their royalty monies being spent on such a facility because it would simply be encouraging people to drink.

The third, and related issue, was transport and road safety. Access to private vehicles is a problem across the Archipelago generally, but having a reliable and safe means of leaving Alyangula after drinking on premises is a critical consideration if greater access to alcohol is to be entertained.

³⁰ Limits are imposed at premises at other communities such as Beswick and Warramyanga. Cards or stamp systems are in place for monitoring purposes.

³¹ Angurugu was particularly scathing of a Police station being built as part of the Stronger Futures initiative but never having any permanent staff. This has hampered responses to local incidents. The community is reliant on the limited resources of the Alyangula Police, and this feeds a sense of vulnerability and no protection.

³² Issues include ensuring people did not leave the precinct to cause trouble elsewhere, the likelihood of long-term feuds being triggered or interpersonal issues erupting into violence, and how to satisfy cultural safety.

Transport concerns are compounded by the distance that people might travel if they were to return to the safety of their communities. From Alyangula it is 20 kms to Angurugu on the Rowell Highway that has continuous traffic of large articulated trucks and mining equipment, and it is 65 kms to Umbakumba. Both roads are unlit at night. The road traffic can also put those choosing to walk home at risk.

A common response to this issue was that people should simply plan ahead. They need to either arrange a designated driver, organise someone else to pick them up or book a place to stay. The preferred solution, however, was that a courtesy bus be provided, either by licensees or the ALC. A bus service was once operated by the communities, with a morning and afternoon trip between all communities each day. Despite the apparent success of that service, some informants were worried that intoxicated passengers could be volatile and additional measures would be needed to ensure safety of the passengers and the driver. If a bus service was to be provided there should be Codes of Conduct agreed to and trialled. The suitability of any transport solution will be strongly governed by where people are going to be allowed to go after drinking.

Three-quarters of the 2023 survey asserted that these three issues must be considered when assessing whether to grant a permit. It is debatable how applicants could guarantee never being prone to these issues and indeed nowhere else seeks such assurances. However, this finding underscores that reasonable solutions should be sorted as part of contemplating an extension of Restricted Permits.

There were mixed views about alcohol access for non-Anindilyakwa living on community. One stance was that outsiders who choose to work and live on community should be prepared to observe the wishes and wants of the community members. If the community does not want any access to alcohol for its members, then it is expected that outsiders will comply. Others, on the other hand, recognised that alcohol is better managed by non-Anindilyakwa and more a part of their culture and lifestyle. Those with this view were more likely to concede that non-Anindilyakwa should be allowed Restricted Permits. There was little support for takeaway being part of their entitlement.

Most non-Anindilyakwa interviewees living in community wanted Restricted Permits at least. As with workers at the Poles, their social networks and cultural enjoyments are more strongly linked to the people and activities of Alyangula. Without permits these opportunities are curtailed and this contributes to stress, isolation and burnout. Being able to freely interact with other non-Anindilyakwa in a familiar setting was considered critical for maintaining their mental and social wellbeing.

Differential access by non-Anindilyakwa staff living on communities has been accepted for decades. As a senior man explained:³³

“When we first moved in here we decided that any balanda that came and worked with us, because they grew up that way, we don’t want to pull that away from them, it’s up to them to apply. But for us mob blackfellas, no permits to takeaway....When you work, you gotta get a beer or two. I’m not talking about my people, because we’ve been introduced to grog. But for you that’s your life. ...It’s always been allowed for staff to have a permit. That’s been made here, before I was a young fella living in the bush.”

As long as that privilege is not abused by bringing alcohol into communities or providing illicit supplies to local people, this approach is likely to be supported into the future.

S19 LEASE DEVELOPMENTS

There are plans to build more infrastructure and living areas on the island.³⁴ Major developments on the s19 lease include a Luxury Resort at Little Paradise Bluff, a Workers Village for employees of the Winchelsea Mine and a Social Club, other enterprises, and a new residential estate to cater for future services and businesses. These facilities are earmarked for land approximately 7km outside of Alyangula.

The resort description includes a “high-quality restaurant and bar” and the Social Club is expected to serve alcohol. Each will require an application to be made to the Northern Territory Liquor Commission for a suitable Liquor License. As with Alyangula licensed premises, their status within the General Restricted Area would have to be clarified according to Section 180 of the *Liquor Act*.

Section 47 of the *Liquor Act* provides for applications to be made for various types of licenses. All applications must satisfy two key criteria: that the license will be in the public interest and that it will not have an adverse impact on the community.³⁵

The Liquor Commission assesses public interest according to a range of criteria, including: the minimisation of harm and ill health; ensuring responsible management and consumption; safeguarding public order and safety; protecting the safety, health and welfare of patrons; increasing cultural, recreational, employment or tourism benefits; promoting legal compliance; ensuring business competence; and preventing any increases in anti-social behaviour or irresponsible drinking.

The Commission must also consider a number of factors when assessing possible adverse effects. These include: any undue offence, annoyance, disturbance or inconvenience to

³³ Northern Territory Licensing Commission. Applicant for Declaration of a Restricted Area. Decision: 11 May 2005

³⁴ Anindilyakwa Land Council and Groote Holdings. Invested In Our Future Groote. Darwin, Groote Holdings Aboriginal Corporation, 2022.

³⁵ Section 49 additionally requires the applicant to be a “fit and proper person”.

people living or working in the area; the geographic area being affected; the risk of harm from inappropriate consumption; the effect on culture, recreation, employment and tourism, as well as social amenity and public health; the density of alcohol outlets; the overall volume of liquor sales; and whether the community impact assessment guidelines issued by the Minister are met. These Ministerial guidelines can require details about the benefits to accrue to the community and the process and results of any consultations undertaken.

The majority of respondents to the 2023 survey (70%) supported future planning to extend permits to workers, visitors and residents as different components of the new development were completed. This support was qualified however, with a common view among respondents and from consultations with Anindilyakwa people that takeaway should not be allowed into the developments due to the risks involved: patrols or incidents stretching limited Police resources, the area being targeted for break-ins and alcohol theft, and encouraging humbug at the small communities in close proximity. Prohibiting takeaway also helps to ameliorate secondary supply.

Future workers and residents will have the opportunity to access alcohol at the licensed premises already established in Alyangula. Regardless of whether private transport is available, plans include a transport network to be put in place. Given the apparent hesitancy that already exists about takeaway alcohol, it is probable that Restricted Permits will eventually need to be administered for people living at the developments too.

Without a definitive timeline or further details about the proposed developments and local services that will be provided, it would be premature to determine exactly what alcohol regime might be most appropriate. At this stage it appears that on-premises drinking only is favoured. The kind of licenses to be sought and the need for permits will be better informed as submissions are made to Licensing and the required criteria and consultations are addressed. Having specific projects and knowing the prevailing circumstances will determine what is most desirable.

A major argument for alcohol access is that it will help attract workers and companies to invest in the economic future of the Archipelago. While there was acceptance that the success of a high-end resort would require alcohol, many were sceptical that alcohol would be sufficient to secure a workforce and alarmed that alcohol would be a focal point for people. The provision of other amenities, services and facilities will also be critical.

Figure 7 is notable in this context. Among respondents to the 2022 survey there was little difference between the number who agreed alcohol was an important factor when deciding to live/work on Groote Eylandt (44%) and those who disagreed (42%).

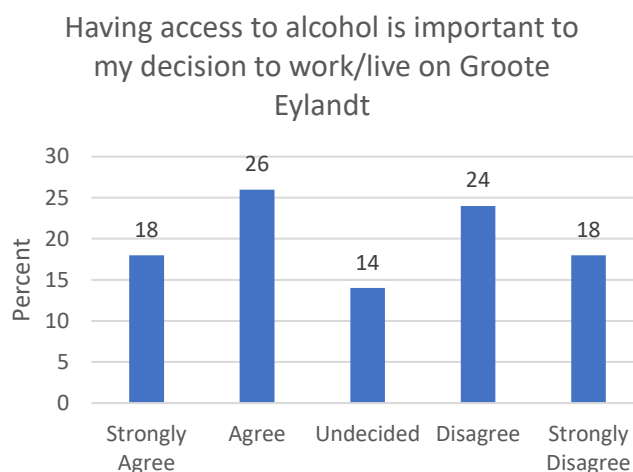


Figure 7 – Alcohol as a Factor in Deciding to Work/Live on Groote Eylandt

OFF ISLAND DRINKING

As found by the initial evaluation in 2007, many Anindilyakwa go off-island if they want to consume alcohol.³⁶ Some go for short periods to places like Nhulunbuy or Darwin. These trips are usually organised, with arrangements to stay safe with trusted relatives or friends. Others stay away for lengthy periods. While some of those people leave specifically to access alcohol, many leave for other reasons and end up getting involved in drinking groups. In Darwin this was attributed in part to alcohol being pervasive and easily obtained and due to the influence of other long-term itinerants.

The CSP officers in Darwin reported that people come to the mainland for an assortment of reasons: to visit relatives in care, attend medical appointments, visit family, go to a show or concert, or to go shopping. Drinking, from their experience, was rarely the primary reason for people coming to Darwin. Socialising was considered the major gateway for drinking. Some people have their own homes, some stay with relatives and others take to the “long grass”.

The CSP officers also observed that people may go back to Groote Eylandt but many will return months later so it becomes a regular cycle. They were clear that it was an individual choice whether to stay or leave Darwin.

Larrakia Nation provides mobile intervention services to Aboriginal visitors and itinerants to Darwin. It has a fee for service agreement with the ALC to deliver a level of service to Groote Eylandt residents. Those services include general transport, assistance with Centrelink and banking, providing proof of ID and more. Assistance separate from this agreement is also delivered. In 2021, for example, Day Patrol supported 822 residents from the Archipelago,

³⁶ Conigrave, K., Proude, E. and d’Abbs, P., Evaluation of the Groote Eylandt and Bickerton Island Alcohol Management System. A report produced for the Department of Justice, Northern Territory Government. July, 2007

322 attended at least one weekly arts and crafts activity held on the beachfront as part of the Healthy Engagement and Assistance in the Long Grass program and Return to Country was organised for 385.³⁷

According to program staff at Larrakia Nation, the behaviour of Anindilyakwa is no worse than for Aboriginal people from other locations (e.g. Tiwi and Wadeye). Nor were Anindilyakwa people considered the most prevalent of the Aboriginal groups around Darwin. Given this context, it can be noted that in 2021 the Larrakia Night Patrol dealt with 585 people from Groote Eylandt and admissions to the Darwin Sobering Up Shelter totalled 556 in 2020-21 and 430 in 2021-22.³⁸ These indicators show that alcohol is a risk factor for many Anindilyakwa people who end up staying in Darwin, but without comparable data for other Aboriginal groups or the total numbers of Anindilyakwa in Darwin it is not possible to gain any sense of its relative impact.

Consultations on Groote Eylandt revealed that it is widely accepted that people who want to drink will go off island. Individuals reported that being elsewhere gave them freedom to indulge themselves, while being able to return to a place that is safe and peaceful. It was also recognised that drinking off island protects younger generations from poor role modelling and the negative aspects of drinking. While people worry about those who leave for extended periods and live in the “long grass”, the overall attitude was that this is preferable when compared to the trouble that alcohol can bring to the community.

It is debatable whether those who stay in places like Darwin and get caught in cycles of alcohol abuse represent the displacement of a Groote Eylandt problem. However it is recognised that those who want to come back to their home communities would benefit from effective treatment and relapse prevention. While residents are wary of the erratic and abusive behaviour that can be displayed by those who return from the mainland, they acknowledge that such services could bridge rehabilitation and be especially positive as they would be conducted on Country and with more family in close proximity to provide support. Establishing appropriate alcohol and other drug services on Groote Eylandt would assist the transition and reintegration of people with substance-related problems returning from off-island living.

PERMIT ADMINISTRATION AND PROCESSES

Figure 8 shows that nearly two-thirds of survey respondents surveyed in 2022 thought the process for obtaining a Liquor Permit was straight forward. Around a quarter disagreed.

³⁷ All data from Larrakia Nation supplied by Outreach Manager, August 2022.

³⁸ SUS data provided by Darwin Program Manager, August 2022



Figure 8 – Liquor Permit Processes

It is notable in this context that an overview of the permit system is provided by GEMCO as part of its online induction, its orientation of workers when they arrive on the island and, for permanent employees, it is written in their contracts. Workers are told the requirements of the system and the restricted areas where alcohol cannot be taken, the importance of securing takeaway alcohol at home and the prohibition on supplying to third parties. The zero-tolerance policy for intoxication in the workplace and breaching the permit system are also made clear. With other companies and contractors, however, it is often left to individuals to find out information about how the system works and how to apply.

There is an absence of easily accessible information about alcohol restrictions. Some interviewees reported being unable to find out any details of the permit system prior to arriving. Many have a notion that restrictions are in place, but they have little knowledge of how the system operates in terms of the process for obtaining permits, where alcohol can be consumed, and the distinction between on-premises and takeaway entitlements. These shortcomings could be addressed by advertising the permit system more extensively through websites (ALC, Licensing NT, and Tourism NT), references in brochures and employer communications.

The most consistent feedback about the permit process related to difficulties arising from having to present in person at the Alyangula Police station.³⁹ An issue especially for shift workers is that the opening hours of the station often do not match their down time. There were also concerns about the variability in the advice given by different Police officers about application requirements.

A range of suggestions were made about changes to the current system.⁴⁰ Many related to minimising delays in the time between applying and receiving a permit. The longer a person is without a permit, the more time that person is excluded from consuming alcohol anywhere in the Archipelago, and this can impact their social opportunities and lifestyle choices. Other

³⁹ Comments specific to the process were made by 22 respondents.

⁴⁰ Comments about changes were made by 108 respondents.

suggestions included having more regular GELPC meetings, transitioning to a fully online system, or developing a smart phone app to enable submissions to be made at any time. Another suggestion was to add a tracking capacity to the process so applicants could at least follow progress and reduce their uncertainty. Other comments suggested having a hard copy permit with photo ID so it is easier to manage and sending reminders prior to a permit expiry date so individuals do not find themselves suddenly without a permit.

APPLICATION PROCESS

The Licensing NT website that explains how to apply for a Liquor Permit specifically requires people to attend the Alyangula Police station for a “name check”. This step is unique to Groote Eylandt applications.⁴¹ Without a compelling reason for this separate process, applications in the Archipelago should be treated the same way as in the rest of the Territory.

Routine applications should be submitted electronically to Licensing NT for the verification of identity. They would then be sent to Alyangula Police for a probity check on the suitability of the person to hold a permit. The application would be presented to the GELPC and then recommendations forwarded to the Director of Liquor Licensing for final approval.

For those staying for only a brief period and who fail to apply before arrival (i.e. tourists and short-term contractors), establishing their bone fides as visitors (e.g. room key or letter from employer) might suffice for limited on-premises access without any permit assessment being undertaken. This is certainly a pragmatic option if the stay does not overlap with a meeting of the GELPC.

It is the GELPC which recommends conditions be attached to any permits. Decisions are made of whether a person should have a full liquor permit or one that excludes takeaway purchases. There is no reason why other conditions cannot be added if they are desired by an applicant.

GROOTE EYLANDT LIQUOR PERMIT COMMITTEE (GELPC)

There is some confusion among residents about who is involved in making permit decisions in the current GELPC, principally because of its expansive and fluctuating membership. It would be helpful to clearly define the purpose and membership of the GELPC. This is important if the GELPC is to respond to demands for permit assessments and reviews in a timely manner. Attention should be given to making sure the most appropriate informants are tasked for the work to be done and that deliberations be as streamlined and focused as possible.

The key function of the GELPC is to assess the suitability of an individual to hold a permit and identify any conditions that might be needed. The membership should comprise people with

⁴¹ <https://nt.gov.au/law/alcohol/permits/apply-for-an-individual-liquor-permit/how-to-apply-for-an-individual-liquor-permit>. Accessed 20 October 2022.

a demonstrated capacity to identify who is of sufficiently responsible character to have a permit. They should be people with access to relevant information, familiar with personal and family situations, having daily interactions across communities, and involved in networks that offer various information sources about individual applicants. Such stakeholders from the current members might be Police, health services, the ALC Community Support Program and South32.⁴² Regardless, those ultimately forming the Committee should only consider membership if it will aid the efficiency and effectiveness of the tasks to be undertaken.

There may be occasions when others might possess information of relevance. Those people might be invited to provide comment, but they should not be involved in the deliberations of an individual applicant. It would be preferable for information from such sources to be collated outside of the meeting and made available to the Committee as appropriate.⁴³

Key activities of the GELPC can include:

1. Making assessments of which applicants should and should not receive a permit and forwarding all applications and recommendations to the Director of Licensing for a final decision.
2. Recommending specific conditions be applied to a permit (e.g. amounts and type of alcohol, times of access).
3. Making recommendations to revoke or vary the conditions of a permit held by a person who has behaved inappropriately or in breach of specific rules of the Groote Eylandt Alcohol Management Plan.
4. Providing reasonable grounds for recommendations.
5. Advising Licensing NT and the Director of Liquor Licensing and the Harm Minimisation Committee on issues affecting the operation of the Liquor Permit System.

Not all members of the current GELPC will be appropriate for these tasks. Those not qualified for the GELPC can still serve a critical role, especially if the strong intersectoral collaboration that has developed among members of the current committee is maintained. That role would be oversight of the broader suite of strategies that work alongside permits to reduce alcohol-related harms.

Permits are often one part of a broader local strategy to manage alcohol. A range of concurrent activities can be operating to minimise alcohol-related harms across a community, such as Night Patrols, health promotion, workplace policies and responsible service of alcohol practices. The effect of each harm reduction measure is enhanced when all activities are coordinated and complementary.

Once the processes and duties of the Permit Committee are hived off, various stakeholders could re-constitute as a Harm Minimisation Committee (HMC). The diversity of the membership would provide a broader and more integrated perspective on how alcohol

⁴² More than 85% of 2023 respondents agreed with these stakeholders to be on a Permit Committee.

⁴³ This assumes that the Committee has some administrative support.

should be managed in the Archipelago. It would also ensure that different strategies are working together to improve community welfare, safety and amenity.⁴⁴ Indeed, it could even have some oversight of the GELPC operations.

A Harm Minimisation Committee should continue separately from the GELPC, to give ongoing voice to licensees, ALC management, major employers, Health, Education and others with an interest in reducing the negative impact of alcohol across the Archipelago. It should also have representatives from Aboriginal organisations and communities to ensure an Anindilyakwa perspective is brought to bear on how matters are dealt with.

Participants should have competencies that enable alcohol issues to be addressed within a broad and integrated framework. Key objectives and activities should be articulated to help define the role of this committee. They might include:

1. Providing a strategic overview to the development, implementation and monitoring of local alcohol management strategies and activities.
2. Actively forming partnerships to generate local solutions for alcohol-related concerns and issues identified by the local community.
3. Promoting Indigenous health and wellbeing and respecting Anindilyakwa Culture and aspirations.
4. Enabling people to drink responsibly without interfering with the rights and enjoyment of others.
5. Ensuring a safe and secure environment in and around licensed premises so the ongoing business of licensed premises is not jeopardised and the safety and wellbeing of staff, patrons and the general community are not threatened.
6. Supporting the uniform adoption of harm minimisation strategies and initiatives in licensed premises.
7. Contribute to the overall amenity, safety, harmony and appeal of the Archipelago.

Another important consideration for streamlining operations of the GELPC and other aspects of alcohol management systems is the provision of administrative support.⁴⁵ Most participants in community-based committees are volunteers and busy people who add responsibilities to their existing workloads. These circumstances can lead to fatigue and eventual disengagement as additional demands build. This could be mitigated by having a dedicated resource responsible for secretarial duties such as organising meetings and coordinating communications, maintaining records and ensuring all necessary data and information is available for decision-making.

⁴⁴ In some places formal Liquor Accords have taken on a coordination role, although initially intended to be an agreement among licensees to reduce alcohol problems in and around their premises. Some have expanded membership beyond the core dictated by the NT Liquor Act (Section 132) and discuss issues that go beyond the boundaries of licensed premises. Section 134(1) mandates that all licensee members comply with any voluntary arrangements agreed by the Accord. See examples from from Nhulunbuy and Kakadu at <https://nt.gov.au/industry/hospitality/law-and-management/local-liquor-accords>

⁴⁵ See chapter 7 in d'Abbs, P. and Hewlett, N. Learning from 50 Years of Aboriginal Alcohol Programs. Singapore, Springer, 2023 (https://doi.org/10.1007/978-981-99-0401-3_7 - accessed 27 September 2023)

Such a position was previously located in Nhulunbuy as part of Licensing NT. Not only did the position assist and facilitate administration of the alcohol management systems operating in the region, it also enhanced local input by bridging the needs and demands of local community and the processes and policies of the central office. The regional position brought intimate knowledge of the systems in place and the conditions they operated in and it had a ready understanding of the communities being serviced and their capabilities and expectations. The position could also better access local networks and relationships and had an appreciation of what local resources were available. These qualities aided the efficient and effective operation of management systems across the region.

It was suggested that a senior Licensing NT position be retained in the region to provide ongoing support and leadership that is locally informed. The position could maintain communications with and engagement of key stakeholders, be a more accessible source of advice and information for local individuals trying to navigate the systems in place, facilitate public awareness of the permit systems, and be proactive in further developing systems to ensure they stay relevant and appropriate.

ENHANCED LOCAL DECISION MAKING

The GELPC provides opportunities to further support local decision making. One option involves the delegation of powers, while another involves greater Aboriginal input in the screening of applications from Anindilyakwa people.

The most direct avenue for increasing local decision making is by delegating powers of the Director of Liquor Licensing. Section 11(2) of the *Liquor Act* allows the delegation of certain powers and functions to local officials, including the CEO of a local council or a Police Officer with the rank of Senior Sergeant or higher who is in charge of a police station. Section 11(1) allows for delegation to a Public Servant with appropriate qualifications or experience. The Director retains responsibility for reviewing the decisions made by any delegate. There are no prerequisite criteria to determine when delegation can or should be made.

Enabling decisions about permits locally offers several benefits. It can streamline processes through more familiar links to the GELPC, facilitate more timely actions and communications with local people, and ensure the prominence of local input and understandings behind decisions made.⁴⁶ For revocations in particular, more immediate action would reinforce the link between the penalty and the breach that occurred.

There are potential risks with delegation being vested in a single person. This could be countered by delegating to two persons who would have to agree: for Groote Eylandt this would be the OIC for Police and the CEO of the Groote Archipelago Regional Council once it is established. As Council is yet to be put in place, an interim arrangement could be to

⁴⁶ This is consistent with a recommendation from the evaluation done 15 years ago that the GELPC have the authority to issue permits.

delegate to Police with a strict condition that decisions must be endorsed by the GELPC (either by consensus, unanimity or some proportional vote). This would reinforce the primacy of local knowledge in the deliberations of the GELPC and ensure that it is not just Police who decide there are reasonable grounds for a decision.⁴⁷

The GELPC advises the Director of Liquor Licensing about the suitability of an applicant to have or retain a permit. Its key function is to provide a local perspective on individuals having access to alcohol. Its value lies in understanding local circumstances (e.g. history with alcohol, Cultural imperatives, community dynamics and aspirations) and an appreciation of individual community members and their propensity to manage alcohol responsibly. This assessment is predicated on previous patterns of behaviour being a reasonable guide to likely risks and future trouble.

To the extent that permits are made available to Anindilyakwa people, more input into the permit processes should be encouraged from Aboriginal communities across the Archipelago. Through shared lived community experience it will be known which individuals are most likely to exhibit undesirable behaviours that can be exacerbated by alcohol.

Anindilyakwa people should be part of the GELPC process and input their knowledge and understandings into deliberations. Selected representatives would need to possess sufficient knowledge and understanding of individuals to know if they or others might be at risk if a permit was given.

Few specific suggestions were offered when Anindilyakwa were asked to identify who might be best placed for this role, but some general comments were made. Concern was often expressed about ensuring the selection process is fair and open to scrutiny, without undue influence by the more dominant family groups and clans. It was also widely held that Panel members should have no conflict of interest or record of poor behaviour that could compromise their integrity in assessing applications. To enhance credibility and effectiveness members should be well respected by community and have an earnest interest in community welfare and safety.

One entity nominated as a conduit between community and the GELPC was the recently established Community Justice Group (CJG). It has been set up to enable community influence on issues of law and justice. Its primary purpose is to help make the justice system fairer for Aboriginal people and to improve community safety and wellbeing. Its operating framework has a number of features that argue it could accommodate the vetting of permits as a function:⁴⁸

1. Membership and structure have evolved from extensive consultation and discussions.

⁴⁷ Even with delegation to two officials, endorsement by the GELPC should apply.

⁴⁸ See Future Groote Committee [Groote Archipelago Community Justice Group Briefing Paper](#), February 2020; Groote Eylandt Community Justice Group [Community Information Sessions](#), February, 2023; Anindilyakwa Land Council and Northern Territory Government [Groote Archipelago Local Decision Making Agreement - Schedule 3.3](#), 2019.

2. Actions and decisions are informed by Community Reference Groups that consist of local people endorsed by their fellow community members. The groups cover all major and satellite communities.
3. There is a core CJG that meets regularly to progress and coordinate matters.
4. A major goal is reducing crime so people, including women and children, are safer.
5. A priority is to develop community rules for more harmonious and safer living and make sure those rules are respected by all people.
6. Preliminary attention has already been given to the development of Community Alcohol Plans aimed at local management of alcohol.⁴⁹

While the CJG is primarily concerned with aspects of the criminal justice system, incorporating members into the vetting process for permit applicants is consistent with its remit of making communities safe. Taking a lead role in community permit processes will also help ensure permits will be as effective as possible in minimising harms. This capacity is strengthened by the community-based foundations of the CJG.

While participation of the CJG provides a further opportunity for it to actively protect their communities, not everyone may want to be involved in making judgements about the character of individuals. Indeed, a degree of unease was expressed during consultations that people will be responsible for the allocation of permits and the consequences that might follow.⁵⁰ This perception can be offset by the identification of selection criteria which are clear to the wider community and there is understanding that each individual would be combining with others to provide an overall assessment. It is also the case that feedback would only be one piece of advice given to the GELPC which must be weighed against other information it will have about an applicant. The GELPC, as a group, then agrees on a recommendation. It does not decide - that is the responsibility of the Director of Liquor Licensing alone. This collective and advisory framework means single individuals cannot be held accountable for outcomes of the permit process. It is important that all community members are aware of this framework and accept that no one person is responsible for what happens.

While this framework goes some way to lessening allegations of preferential treatment, this risk will also be influenced by how Anindilyakwa representatives formulate their advice to the GELPC about individual applicants. One way is to invest credibility in the experience and authority of the representatives themselves; another might be to canvass family members and key community sources (e.g. Peacemakers, Health); and another could be consulting with the Community Reference Groups. It should be up to the CJG to determine the most appropriate process and the one least likely to be open to challenges of personal bias.

⁴⁹ Initial meeting with Harm Minimisation Unit in May 2023 for development of Community Alcohol Plans

⁵⁰ Tensions can arise when applicants do not secure a permit. There can also be personal crises for the informants if the applicant is someone they have no cultural or delegated authority to control, and, if support is given and at a later date the person is involved in incidents of alcohol-related harm.

To the extent that the CJG decides to gather community feedback, there is a case for ensuring that women, and especially those of the older generations, are involved. As prime movers for the permit system in the first place and with women and families historically bearing the brunt of harms perpetrated by drinkers, they have a more personal and vested interest in permits being an effective control. Their perspective would add to the fidelity of the selection process.

The CJG should also consider what key information should be considered by the GELPC when assessing applications from Anindilyakwa people. While the GELPC has an existing checklist for assessing applications, it would be culturally responsive to review this list and ensure it is sensitive to Anindilyakwa expectations. There may be no changes to make, there could be some found to also apply to non- Anindilyakwa and there might be others that are particular to Anindilyakwa people.

Based on the pivotal role of family and community relationships in the social and emotional wellbeing of Aboriginal people and the functioning of communities for example, there may be qualities that identify individuals as being more likely to disrupt or reinforce those connections.⁵¹ Without pre-empting discussions within the GELPC, there may be various exclusion criteria (i.e. behaviours or qualities community does not tolerate), such as repeated anti-social and disrespectful behaviour, failure to meet obligations and responsibilities, ongoing mental and physical health issues, elder abuse and incessant humbug, or gambling addiction. There might also be inclusion criteria (i.e. qualities exhibited by applicants which sets them apart as being more suitable), such as the person is a positive contributor to community, puts family first, shows restraint and self-discipline, is gainfully occupied or widely respected.

Whatever the case, there should be an opportunity for the GELPC to revise and formally adopt the criteria to be used. Those criteria need to be readily endorsed and understood by most community members. This transparency will aid the autonomy of decision-making processes.

Having defined guidelines for determining the suitability of an applicant and the active participation of community members in the decision-making process means Anindilyakwa people will be setting the standards expected of their countrymen if they are to hold permits. This adds a dimension of empowerment to the process. This is important for being able to defend advice on the basis of 'special measures'. In 1995 the Human Rights and Equal Opportunity Commission found that alcohol restrictions imposed by Aboriginal communities themselves were justifiable when intended to assist or protect vulnerable populations.⁵² Rejecting an application from an individual who fails to satisfy the community definition of

⁵¹ See Dudgeon, P., Milroy, H. and Walker R. (eds), Working Together: Aboriginal and Torres Strait Islander Mental Health and Wellbeing Principles and Practice, Canberra, Commonwealth of Australia, 2014

⁵² Race Discrimination Commissioner. Alcohol Report: Racial Discrimination Act 1975 Race Discrimination, Human Rights and the Distribution of Alcohol. Canberra; Australian Government Publishing Service, 1995.

being “fit and proper” could be seen in this light – a way of shielding community members from potential harms.⁵³

SECONDARY SUPPLY

There was some consistent feedback about improving the monitoring of packaged alcohol to minimise the harms that can result from secondary supply and on-selling. These practices by non-Indigenous are especially concerning for many Anindilyakwa people. Alcohol is known to be used as currency for financial gain and in exchange for cannabis and other favours/benefits.

Despite the vigilance of Golf Club management over takeaway sales and Police supervision of shipped deliveries, there were calls for enhanced monitoring to detect excessive takeaway purchases and mail order supplies. Some argued that limits should be placed on the type and quantity of packaged alcohol that can be allowed. But while limiting takeaway purchases and monitoring large purchases can have some effect, on-selling and secondary supply can equally come from small purchases - especially when re-sold at inflated prices or buyers are desperate.

Apart from banning takeaway sales, an alternative strategy is to build an environment that reinforces it being socially unacceptable. This can be done through signage and messaging that highlights the illegality of secondary supply under the agreed Management Plan and spells out the penalties that can result (i.e. loss of certain permit entitlements, full revocation of a permit or dismissal from a job). Emphasis should equally be given to the practice going against the expressed wishes of Anindilyakwa people and that those wishes emerged from hard lived experience.

Anindilyakwa people too must be reminded they should not be party to any illegal alcohol supply and those who do need to be reported to Police. A further disincentive for Anindilyakwa might be clan leaders or CJG devising sanctions that can be enforced at the community-level (e.g. the withdrawal of some entitlement or performance of tasks that benefits the community). This can be done in consultation with Police.

Key messages could also be displayed publicly. They could reiterate responsible drinking practices, the zero tolerance of secondary supply and where to find more detailed information and advice. Public messages should emphasise the rationale for the permit system being in place. There needs to be acknowledgement that it is part of Anindilyakwa self-determination and borne from experiences still resonating to this day. Explaining the system as respect for community wishes is likely to counter the imposition that some feel.

⁵³ While appeals can go to a Tribunal without the same requirements as a court, legal advice might be sought on this conjecture.

RECOMMENDATIONS

The current alcohol management regime emerged from efforts to satisfy wishes of the local Aboriginal population that there be no alcohol sales to any Anindilyakwa person. Permits were introduced to enable this goal to be enforced and for theft and other illegal supply to be discouraged. This has been achieved whilst still allowing access for non-Anindilyakwa workers and businesses instrumental for providing services and wealth generation.

This review has identified strong views and attitudes about the future of alcohol management. There is general acceptance that alcohol should not be brought into Aboriginal communities across the Archipelago. There is division, however, about the extent that restrictions should apply to Anindilyakwa people. This divide is largely based on potential risks that could arise from greater access, including drink driving accidents, community disruption, family violence and neglect, anti-social behaviour around Alyangula, increased break-ins and more humbug. While some are adamant that these risks will inevitably be realised if access is increased, others are more dismissive of risks because permits will only be issued to responsible persons. There are also people between these two extremes who are simply unsure.

To break this cycle of speculation and get a practical gauge of the effects that come from easing restrictions, the ALC Board has proposed that a trial be conducted.⁵⁴ To maintain a level of stability within communities, modest concessions are suggested and implementation is to occur under strict conditions and processes. This will give all residents a chance to see for themselves the immediate impact of changes without there being a commitment to any long-term variations. Actual benefits and problems will be demonstrated so an informed decision about future alcohol management can be made.

To protect against any local bias on how the impact of the trial is interpreted, it is suggested that an independent agent be engaged to analyse relevant data and report the findings. This information can then be forwarded to key stakeholders to consider what actions should be taken next.

It will be critical for the trial to be widely publicised and explained before it is implemented. This can occur through various channels (e.g. radio, posters, meetings, social media) and be in a mix of languages. All residents need to understand what changes are being tested, the rationale for the trial, the consequences that might flow and how anticipated problems will be addressed. Making people fully aware will help manage expectations and assist with the proper conduct of the trial.

⁵⁴ An email dated 12 November 2023 from Sam Cass, Legal & Executive Operations Officer, Anindilyakwa Land Council, details the preferred actions decided by the ALC Board after considering a draft report of the findings of this review.

Recommendation 1

Under the auspices of the Director of Licensing, conduct a six-month trial of select changes to the current Liquor Permit System.

The trial to be overseen by the existing Groote Eylandt Liquor Permit Committee (GELPC). Start date to be determined by the Director of Licensing.

Details of the trial to be widely publicised to all residents prior to commencement.

The GELPC to organise for appropriate information and feedback to be sourced from relevant stakeholders over the course of the trial. This data to be provided to an independent agent to analyse and prepare a report of trial results.

At the end of the trial period the GELPC to assess trial results and provide recommendations. The ALC Board to consider what, if any, changes should continue.

In light of results from the trial, an Alcohol Policy Statement to be adopted by ALC Board as a reflection of the needs and wishes of Anindilyakwa people.

The ALC Policy and requested permanent changes to the Permit System to be presented to the Director of Licensing for considered action.

All or part of the trial may be ceased immediately should there be reasonable grounds brought to the attention of either the ALC Board, the GELPC or Licensing NT.

The ALC Board has specified the changes to be trialled. They relate primarily to permanent residents. To qualify as a permanent resident, a person must have a driver's license or other official form of identification that shows his or her residential address in the Archipelago, be living in permanent housing, and have resided in the Groote Archipelago for at least three months continuously.

A distinction is made between those living in Alyangula and Pole 7 and those living elsewhere on the islands. While the former will be eligible for Full Permits, the latter will only be able to apply for Restricted Permits. This is predicated on the proven situation that has been operating in Alyangula and recognition that people living at Pole 7 are predominantly permanent personnel and families.

Various employment and housing contracts contain conditions relating to alcohol use and access. These will continue to operate during the trial. Similarly, current permits that have been issued to people in Alyangula and Pole 7 will not vary, unless through a new application being submitted to the GELPC.

Recommendation 2

For the duration of the trial:

- All permanent residents in Alyangula township and at Pole 7 to be eligible to apply for either a Full or Restricted Permit.
- The eligibility for Full Permits only applies to permanent residents living within the Pole 7 Permanent Housing area. It does not extend to people living at the ALC workers camp at Pole 7 or the GHAC workers camp at Pole 7A (who may only apply for Restricted Permits), and existing conditions associated with housing or employment agreements are to be maintained.
- Permanent residents of the Groote Archipelago living outside of Alyangula and the Permanent Housing area at Pole 7 to be eligible to apply for Restricted permits.
- All new permit applications must be approved by the GELPC.
- Representatives of the Community Justice Group (CJG) will advise the GELPC on all Restricted Permit applications from Anindilyakwa community members.
- An audit be conducted of existing liquor permits held by people living outside of Alyangula and Poles 7. All legitimate permits to be “grandfathered” until the end of the trial.
- Visitors will not be able to apply for Full Permits.
- No alcohol to be permitted on any Aboriginal communities.

It is also proposed that existing permits held by individuals living outside Alyangula and Pole 7 continue to be valid for the period of the trial. An audit should be carried out to establish the veracity of these permits. This might be problematic given the poor record keeping practices of the past, but some form of documentation should at least be sighted or an agreeable arrangement be decided so individuals are not disadvantaged by past shortcomings in processes.

The trial will allow both Anindilyakwa and non-Anindilyakwa living at Aboriginal communities to apply for Restricted Permits. This does not entitle them to bring alcohol or store alcohol in community. Severe penalties, including expulsion for non-Anindilyakwa staff, should be imposed for any transgression. People affected by this must be made aware of the situation before applying for a permit or moving to live in a community.

Similarly the future approach to alcohol in the s19 precinct at Little Paradise should be developed as stages are completed. While there is general support for Restricted Permits as the preferred control for now, this could change over time and the true needs of the area should be accurately assessed as circumstances change. Whatever is to occur in the precinct in the future, applications for licenses and exemptions need to be made in accord with legislated requirements.

Recommendation 3

The trial will enable people living on the s19 lease developments at Little Paradise to apply for Restricted Permits, but future alcohol management needs for that area must be monitored. Any change to this access should be determined as each part of the development is completed. Each assessment to include consideration of actions that limit negative consequences flowing to neighbouring communities and protect the amenity and safety of the precinct. The views of the local landowners to be paramount.

Applications for appropriate liquor licenses to be made in accordance with the Northern Territory *Liquor Act 2019*, noting sections 47 and 180 in particular.

A number of pre-conditions need to be addressed prior to the start of the trial. One is to set up community-based structures and processes aimed at vetting the permit applications of Anindilyakwa people. With consent from its members, it is preferable that these mechanisms be managed by the CJG. They will facilitate Anindilyakwa input into permit processes.

The CJG will select suitable individuals to be appointed as representatives to the GELPC. These people will provide direct input into the deliberations of the GELPC. They will be important in bringing an understanding of the applicants and their likely effect on the amenity and wellbeing of the community. To enhance transparency and avoid allegations of preferential treatment, representatives should not have any conflicts of interest with the role they perform.

It will also be necessary for the CJG to determine how the representatives are properly briefed so they can provide fair and informed commentary on permit applications made by individual Anindilyakwa. Information might be sourced from community leadership, from key stakeholder organisations with a link to alcohol use or from other community channels. Whatever the option chosen, it should be open to scrutiny with key selection criteria made explicit and promoted among Anindilyakwa.

As much as possible, it is suggested that decision-making processes be group-oriented. This distances the final outcomes of the application process from any single individuals being held responsible (and potentially targeted). The information taken to GELPC will be examined along with any other intelligence available and a final recommendation forwarded to the Director of Licensing who then decides whether to approve the application or not. This approach provides anonymity within collective accountability.

The information provided by the CJG representatives will offer a vital community perspective to liquor permit deliberations. Along with the consideration of any other details available to the GELPC, including the Police background check, the representatives will be the primary source of local advice or feedback on individual applications from Anindilyakwa.

Recommendation 4

The CJG to establish and oversee necessary processes and structures to facilitate Anindilyakwa participation in the management of liquor permits for community members in a safe and confidential manner.

This will include:

- Identifying suitable individuals to represent community members on the GELPC and provide relevant commentary to assess whether an application should be supported or not. Members should not have potential conflicts of interest in performing their role.
- Determining the means by which a fair and informed assessment of individual applications can be formulated.
- In conjunction with other GELPC members, identify key criteria to be used when assessing applications, noting that consideration will be given to both the circumstances of an individual applicant and potential impact on the safety and amenity of the community.

Agreed processes and structures to be included in the GELPC Terms of Reference.

Selected representatives to attend the GELPC and present advice and feedback on the appropriateness of Anindilyakwa applicants to hold a Restricted Permit. While that information will be of critical importance, the final recommendation about an application shall be the result of whole of GELPC processes and the final decision about an application will be made by the Director of Licensing.

The functions and members of the GELPC should be separated from the current group overseeing permits for the Archipelago. The GELPC should involve fewer people and be able to operate independently of the larger committee that currently exists. This will streamline the permit application process and facilitate more frequent meetings as Anindilyakwa become more involved. A forum for other key participants with an active interest in minimising alcohol harms in the community should continue. This should include suitable Anindilyakwa representatives who can present community perspectives and ideas. Along with other permanent Committee members and stakeholders that might be co-opted as necessary, those representatives would add to the multi-dimensional analysis of issues and could take a lead role in developing solutions acceptable to the Anindilyakwa.

Although there may be some overlap in membership, this would result in two committees: the GELPC with a focus on individual entitlements and a Harm Minimisation Committee concerned with a broad strategic and integrated approach to alcohol issues and solutions. While the GELPC is formally recognised through legislation and practice, it will be important for the HMC to identify key corporate, government and community links it will need to action decisions and make useful contributions. External support for the Committee should be paramount if it is to be effective and add value.

Recommendation 5

Review Terms of Reference and membership of the GELPC. The principal function of the GELPC to be determining the suitability of individuals to have access to alcohol and any conditions that might apply to that access. Membership to be limited and only include persons suitably qualified to comment on individual entitlements. Amended Terms of Reference to be adopted.

Other existing GELPC members to continue to operate as a Harm Minimisation Committee (HMC), with focus on the strategic development, implementation and monitoring of integrated and complementary alcohol management activities and initiatives across the community. Terms of Reference to be developed to define the role of the committee.

The HMC to include Anindilyakwa representatives identified by the CJG as suitable to reflect community perspectives and mobilise local capacity. Terms of Reference to include details determined through the CJG to be appropriate for Anindilyakwa engagement and participation.

Other stakeholders to be co-opted to the HMC from time to time as necessary to address particular matters.

A priority task for the HMC, or the existing GELPC if the HMC is not likely to be imminent, should be pre-empting some of the issues raised during consultations about eased restrictions. Those issues include:

- security of houses at Pole 7
- drink driving risks
- humbug
- intoxicated persons returning to community
- break-ins and secondary supply
- transport options to enable people to exit Alyangula
- community disruption

It is recognised these issues may emerge at different rates (if at all) and that effective solutions might take time to put in place or simply be on standby in the event they are needed. Despite limits on what preventative measures and solutions might be agreed and implemented with minimal delay, it is critical that the HMC at least canvas a range of contingencies and have initial responses formulated prior to the trial being conducted. Without some level of preparation the trial could be set up to fail.

Recommendation 6

An immediate priority of the HMC to be examining potential problems that might emerge with expanded access during the trial. Suitable strategies addressing issues are to be developed and/or implemented, with Anindilyakwa members leading the identification of community-based responses.

In lieu of the HMC being fully formed this priority to be addressed by the existing GELPC in partnership with community representatives nominated by the CJG.

Deliberations to be taken into account by the Director of Licensing when determining start of trial.

The scope of the trial proposed by the ALC Board does not address what arrangements should be made for Aboriginal visitors staying outside Alyangula or Pole 7. It is suggested that this be a task for the immediate attention of the CJG and the GELPC. Local people have networks with neighbouring Indigenous communities on the mainland (e.g. Numbalwar) and individuals and families visit from time to time. The CJG is to develop a policy about whether these people, and Aboriginal people visiting from elsewhere, should be treated differently from the general provision for local Anindilyakwa living in communities. Options might be to prohibit any access or to allow Restricted Permits. In any case, if this policy is decided prior to the end of the trial, it should be incorporated as part of the trial and its ongoing maintenance determined at the end of the trial.

Recommendation 7

The CJG, through the GELPC, to develop policy about what permit arrangements should apply to Aboriginal visitors who will be staying outside of Alyangula and Pole 7.

Policy to be incorporated into trial for evaluation.

To summarise, the Director of Licensing will determine the parameters of the trial but its day to day operation will be managed locally. Ideally, if necessary planning and restructure can happen in a timely fashion, this should occur through the Harm Minimisation Committee as part of its broad oversight of alcohol management. That will leave the GELPC to concentrate on administration of the permit system. In the absence of these two committees being formed the existing GELPC should be the responsible body for both. The ALC has a role in determining the policy that will be adopted by the Anindilyakwa for the foreseeable future.

While the trial will give community members greater say in local alcohol management, local empowerment can be further enhanced by delegating local authorities to make decisions

about permits. This could deliver greater appreciation of local circumstances and considerations to the deliberation process.

Recommendation 8

The Director of Liquor Licensing to explore the feasibility of delegating powers and functions related to the permit system to a local authority. Discussions to decide which specific powers and functions will be delegated to enable more local decision-making in the management of permits. The final delegations to be at the discretion of the Director and in accord with the *Liquor Act (2019)*.

Should delegations be vested in a single authority, decisions by that authority are to only be made with the endorsement of the GELPC.

Local engagement and empowerment can also be assisted by having dedicated administrative support and guidance. In the past a Licensing NT officer was located in Nhulunbuy who assisted specifically with the management systems operating in the East Arnhem region. The position was particularly useful in light of local complexities arising from the cultural mix of the populations involved, the changing socio-economic dynamics of the region, the need for timely action and problem-solving because of the unprecedented and evolving nature of the systems, their remote settings and limited infrastructure.

It would be helpful for a senior Licensing NT position to be reinstated. The position could fulfil a number of functions including maintaining communications and engagement with key stakeholders so local enquiries and responses to issues can be addressed more easily, being a more accessible source of advice and information for local people or visitors trying to negotiate the systems, facilitating public awareness of the systems, and being proactive in developing the systems to ensure they stay relevant and appropriate. The position would be an informed, reliable and confidential resource for mediating the needs and priorities of local communities and the processes and policies of the central office.

Recommendation 9

Licensing NT to maintain a regional position to provide administrative support, guidance and development of all aspects of alcohol management systems put in place. This includes operations of Permit Committees and other community-based advisory bodies such as the Harm Minimisation Committee. The position should be at a level that allows for collaborative decision-making, the practical exercise of discretion and initiative, and capacity to provide oversight and develop systems so they remain efficient, effective and appropriate to meet community needs. Position to be adequately resourced to perform the duties assigned.

Such support would also aid the sustainability of local committees and processes. Most participants involved in the governance of local alcohol management strategies are

volunteers or co-opted Government employees who add responsibilities to their existing workloads. Fatigue and disengagement can result if demands on these people are not eased. This issue is exacerbated by the difficulties in finding people with enough time, interest and competence to be involved in the first place. Licensing NT should provide reasonable support to bolster participation.

A couple of other improvements could be made independent of the proposed trial. One is to expand general knowledge and understanding of the permit system. The review found that people varied widely with what they knew about the system. Key aspects of the system (e.g. no secondary supply, responsible drinking, and respect for the wishes of the Traditional Owners) should be promoted more broadly via public signage around the islands so people are constantly reminded or encouraged to learn more about its operation and intentions. The trial could be used as a launching pad for this type of campaign.

Recommendation 10

Relevant agencies to develop an ongoing suite of public messages, to be targeted especially around the area of Alyangula, the Poles and Little Paradise s19 leases, and consisting of:

- public signage highlighting the problems of secondary supply and on-selling and what actions individuals should take when such instances occur.
- publicly displayed information about how the permit system works, related health and safety messages and the rationale of the system being grounded in the wishes of Anindilyakwa people.

Attention might also be given to enabling as much of the application process as possible to be computer-based. The current requirement for applicants to attend the Alyangula Police station in person is a particular hindrance. While this change can be examined immediately, results from the trial should further inform the extent to which full computerisation should occur and identify if other processes might be needed to support Anindilyakwa.

Recommendation 11

Licensing NT to enable as much of the Liquor Permit application process as possible to be facilitated online.

Website instructions to be maintained accordingly and include reference to all documentation that is to accompany an application.

Licensing NT to work with CJG and GELPC to ensure processes allow for efficient and effective engagement of Anindilyakwa people in operation of the permit system.

The final two recommendations do not impact directly on the permit system but they are important in the broader context of alcohol management for the Archipelago. The first is about protecting the story of alcohol, its effects on communities and the pathways taken toward self-determination. The second is about addressing the social and emotional wellbeing of people.

Expressions of personal distress and descriptions of fractured relationships attributed to alcohol in the past were pervasive during consultation. For many these effects are profound and remain unresolved and influential in their lives. This argues for more dedicated support being provided to aid individual and collective healing. There are a variety of programs that address social and emotional wellbeing, the foundation of Aboriginal health.⁵⁵ Aboriginal-specific programs (e.g. Dadirri and Tree of Life) have been developed to improve mental health and resilience, give individuals a better understanding of their personal circumstances and teach coping techniques.

Consultations also raised the need for treatment services for people with current alcohol problems and, further, interventions for other underlying issues in the community (e.g. increased use of cannabis, the prevalence of gaming and gambling, and anger management). There were also calls for more education about alcohol management (including basic information about its effects on health, behaviour and associated problems), as well as teaching responsible drinking practices, strengthening personal decision-making and training in peer resistance strategies. This would aid safer drinking by Anindilyakwa people who go off-island to consume and prepare others in the Archipelago should restrictions be relaxed.⁵⁶

Recommendation 12

Explore healing programs and services to address intergenerational trauma and the social and emotional wellbeing of individuals continuing to be impacted negatively by historic alcohol-related experiences.

Consider establishing local rehabilitation services to address issues related to alcohol and cannabis abuse, gambling, anger management and other concerns.

The decision made by communities of the Groote Archipelago to introduce liquor permits and restrictions was a watershed initiative for Anindilyakwa people and the overall approach to

⁵⁵ See [National Aboriginal and Torres Strait Islander Health Plan 2021-2031](#). Canberra, Department of Health, 2021; Krakouer, J., Savaglio, M., Taylor, K. and Skouteris, H. Community-based models of alcohol and other drug support for First Nations peoples in Australia: A systematic review. [Drug and Alcohol Review](#), 41, 2022, 1418–1427

⁵⁶ Anindilyakwa Land Council. [6 Local Decision Making Agreements](#), 2022 indicates a Cultural Rehabilitation Centre is to be constructed – providing an alternative to custody for young males. Individuals will have access to tailored rehabilitation services that target risk factors that contribute to criminal behaviour. Without diminishing the priority for this specific need, some re-design might enable broader interventions for more target groups to be added. Otherwise these other services should be encouraged through existing service providers or visiting specialists – preferably with local capacity building as part of delivery.

alcohol management in the Northern Territory. It would be instructive to have the experiences of the older generations recorded as a ready account of the climate in which that decision emerged and as a reference for people to learn about and understand the history involved. Documentation could be video, audio, written or some other medium. Both men and women could share their stories and recollections and reflect on how the system has affected themselves and their communities.⁵⁷

Recommendation 13

Individuals to be encouraged, within a culturally and personally safe environment, to detail their experiences of how alcohol impacted their lives prior to the introduction of restrictions and after. The documentation to be a permanent and accessible record for all local Anindilyakwa people.

The people of the Groote Archipelago have evolved a system of alcohol management to address their local concerns and circumstances. There should always be a readiness to adjust and evolve if the system is to stay relevant and effective. Such adjustments, however, must be informed, considered and broadly supported. The key recommendations of this review outline a measured and practical way for this to occur. Ultimately, any changes must continue to meet the needs and aspirations of the Traditional Owners.

⁵⁷ This aligns with a recommendation from the original evaluation by Conigrave et al that “education should include a reminder on the key phases of the history of the impact from alcohol on Groote Eylandt communities and the communities’ responses to these alcohol -related harms”.

APPENDIX A – SAMPLE DETAILS

CHARACTERISTICS OF ACHIEVED SURVEY SAMPLES

A total of 160 individuals completed the 2022 survey.⁵⁸ The sample was predominantly male (61% versus 38% females).⁵⁹ The median age was between 35 and 50 years, with about a quarter being younger and a quarter being older. From those who reported Aboriginality (n=157), 8.2% identified as Indigenous and 91.7% identified as non-Indigenous.

Most respondents lived in Alyangula (64.9%). A quarter (26.5%) lived at Poles 7, 11, 12 or 13 and the remainder reported living elsewhere (8.8%). More than half (54.4%) identified as permanent residents while the remaining 45.6% identified as contracted FIFO workers.

Most respondents drank alcohol at least weekly (70%). Around one in seven drank every day. Around 6% reported that they never drink alcohol. Among those who reported consuming alcohol in Alyangula, the most common drinking locations were a licensed premises (67%), home (29%) and the home of family or friends (3%).

Less than two-thirds of respondents held some form of liquor permit. Four out of every ten reported not having any kind of permit. The vast majority of respondents in Alyangula held Full Permits (81%). At the Poles the majority had no permit (81%), while 13% had Restricted Permits and 6.4% had Full Permits (6.4%). People living elsewhere either had no permit (64%) or a Restricted Permit (35.7%).

The 2023 survey was completed by 58 individuals and another two who responded on behalf of organisations.⁶⁰ The majority resided in Alyangula (69%). Residents at the Poles accounted for a quarter (24%) and the remainder were equally living in either Angurugu or Umbakumba.

People living at the Poles were mostly from Pole 7 (n=13), with only one other being from Pole 13. All Pole residents identified as non-Indigenous. Overall, most respondents (89.5%) identified as non-Indigenous, 9% identified as Aboriginal and one person identified as Aboriginal and Torres Strait Islander. More than half of the sample were females. Males comprised the remaining 43%.

The following Tables provide a breakdown of the key affiliations of interviewees. While some interviewees reflected a corporate view on the issues discussed, the organisational base of others was simply a means for recruiting participants who would provide their own personal commentary on the issues.

⁵⁸ Some respondents did not answer all questions, so reported data are based on the number who provided valid responses to each relevant question.

⁵⁹ One respondent classified gender as "other".

⁶⁰ The organisational responses have been weighted the same as the other responses.

Table 1
Numbers of 2022 Interview Participants by Organisational Affiliation and Aboriginality⁶¹

Stakeholder	Aboriginal		Non-Aboriginal	
	Male	Female	Male	Female
CSP (Angurugu and Darwin)		2		1
Bickerton Island Community Meeting		40+		
Licensed premises (all three Managers)			4	
Anindilyakwa Land and Sea Rangers	5		1	
South23 (Living Area)			1	
GEBIE (Manager and Chair)		1		1
Community members		2		
South23 (External Affairs)				1
Strong Women's Group		25		
Men's Shed	15			
ALC Board, Chair and CEO		16+	2	
GEBIE Gang	15			
NIAA	1			
Bartalumba	1	3		
Malkala	1			
Peacemakers	1	1		
Angurugu School Principal			1	
Groote Eylandt Aboriginal Trust (GEAT)		1	1	
Larrakia Nation	2			
Golf Club patrons	2			
Little Paradise Community		1		
Health clinics				2
Angurugu Community member	1			
Corrections				2
Aged Care (male and female)	4	7		
Four Mile Community		4		
Community members (bush medicine)		3		
Angurugu community meeting	1	8		
GEBIE Construction workers	9			
Angurugu Arts Centre		4		
Umbakumba Community meeting	11	10		
Arirrkki Aboriginal Corporation	1			
Umbakumba young women		3		
Licensing NT			1	1
Police			1	

⁶¹ The list does not contain every individual who participated in the Discussion Groups. Some did not register their details but did take part. The numbers for the ALC Board and Bickerton Island are conservative estimates as no formal count was made.

Table 2
Numbers of 2023 Interviewees by Organisational Affiliation and Aboriginality

Stakeholder	Aboriginal		Non-Aboriginal	
	Male	Female	Male	Female
Community Justice			2	1
Anindilyakwa Housing Corporation	2			
GEMCO			1	2
Strong Women's Group		12		
NIAA		2		
Bartalumba	2	4		
Health clinics				1
Aged Care	3	5		
Groote Eylandt Liquor Permit Committee			5	4
Angurugu community group	24	13		
Warningakalinga Corporation	1		3	1
Umbakumba community meeting	3	7		
Warnumamalya Health Services	2	5		
Licensing NT				1
Police			1	

APPENDIX B – COPY OF SURVEY QUESTIONNAIRES

Alcohol Permits

Access to alcohol on Groote Eylandt is controlled by a system of Liquor Permits. This has been the case for many years. This survey is being conducted to find out whether permits still meet the needs of the community. You can help by answering the following questions as honestly as you can.

For some questions you will only need to check a box. For others you can write whatever you want in the text box provided.

No identifying information will be linked to this survey. Your participation is completely voluntary. But you are encouraged to complete as much as you can in order to gain the most accurate understanding of how people regard the current situation.

There are 12 questions listed. Please begin.

1. What is your gender?

- ☐ Male
- ☐ Female
- ☐ Other

2. How old are you?

- ☐ 18-24
- ☐ 25-34
- ☐ 35-50
- ☐ Over 50

3. How do you identify?

- ☐ Indigenous
- ☐ Non-Indigenous
- ☐ Other (please specify)

4. Which of the following best describes your situation?

- ☐ Permanent resident living in Alyangula
- ☐ Permanent resident living at Pole 7, 11, 12 or 13
- ☐ Permanent resident living somewhere other than Alyangula or Poles 7, 11, 12 or 13
- ☐ FIFO worker living in Alyangula when on Groote Eylandt
- ☐ FIFO worker living at Pole 7, 11, 12 or 13 when on Groote Eylandt
- ☐ FIFO worker living somewhere other than Alyangula or Poles 7, 11, 12 or 13 when on Groote Eylandt

5. How often do you consume alcohol?

- ☐ Daily
- ☐ Weekly
- ☐ Monthly
- ☐ Less than once a month
- ☐ Never

6. Where do you mainly consume alcohol when you are on Groote Eylandt?

- ☐ At a licensed venue (e.g. ARC, Golfie, Lodge)
- ☐ At home
- ☐ At home of a friend or family members
- ☐ Other (please specify)

7. Do you currently hold a liquor permit?

- ☐ Yes, a Full Permit so I can drink on licensed premises and buy takeaway
- ☐ Yes, a Consumption Only Permit so I can drink on licensed premises but cannot buy takeaway
- ☐ No, I do not have any permit

8. Indicate how much you agree with the following statements:

	Strongly Agree	Agree	Undecided	Disagree	Strongly Disagree
Groote Eylandt has very few alcohol-related problems and incidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Comments:	<input type="text"/>				

The process for getting a liquor permit is

☐ ☐ ☐ ☐ ☐

straight
forward
and easy to
understand

Comments:

Liquor
Permits
should be
removed
and people
left to look
after their
own levels
of drinking

☐☐☐☐☐

Comments:

Having
access to
alcohol is
important
to my
decision to
work/live
on Groote
Eylandt

☐☐☐☐☐

Comments:

People
living at
Poles 7,
11, 12 or
13 should
be able to
apply for
Full liquor
permits.

☐☐☐☐☐

Comments:

Liquor
Permits
are
important
for
preventing
excessive
drinking
and
associated
problems

☐☐☐☐☐

Comments:

People
should be
able to
apply for
Full liquor
permits
regardless
of where
they live
on Groote
Eylandt



Comments:

9. If you live in Alyangula and want to consume alcohol you must have a Full Permit that allows you to drink at a licensed venue, purchase takeaway or order alcohol by mail. What do you think is good or bad about this system?

10. At present any person living outside of Alyangula can only drink alcohol if they are a member of a club and have a Consumption Only Permit. They cannot have a Full Permit to buy takeaway. What do you think is good or bad about this system and why?

11. What changes, if any, would you like to see made to the current Liquor Permit system?

12. Do you have any other comments or feedback about the current system of Liquor Permits?

Liquor Permit Follow Up

This survey is seeking feedback about some key issues that emerged from consultations conducted last year as part of the review of the Groote Archipelago Liquor Permit system.

You are invited to answer the following questions. They are based on a Discussion Paper and Interim Report that have been made available - contact the AIS in Angurugu or email strategicdimensions@bigpond.com if you want a copy. This survey can still be completed even if you have not seen those documents.

For some questions you will only need to check a box. For others you can write whatever you want in the space provided.

Your responses will remain confidential. Your participation is completely voluntary. Your comments will help inform a new alcohol policy for the Groote Archipelago.

There are 19 questions listed. Please complete as much as you can so the most complete picture of what people think can be identified.

Please begin when you are ready.

Liquor Permit Follow Up

1. If you are answering on behalf of an organisation or group, please provide name of that group and then skip to Question 5:

2. If you are answering as an individual, where do you live when you are on the Groote Archipelago?

☐ Alyangula

☐ Pole 13

☐ Milyakburra

☐ Pole 7

☐ Angurugu

☐ A satellite community or outstation

☐ Pole 12

☐ Umbakumba

3. If you are answering as an individual, what is your gender?

☐ Female

☐ Male

☐ Other

4. If you are answering as an individual, how do you identify?

☐ Non-Indigenous

☐ Torres Strait Islander

☐ Aboriginal

☐ Both Aboriginal and Torres Strait Islander

Liquor Permit Follow Up

5. To distinguish people who come to the Groote Archipelago, do you agree with the following definitions?

	Agree	Disagree	Don't Know
(a) A resident is any person with a permanent residential address in the Archipelago that can be verified on some form of ID.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If Disagree, please explain why:			
<input type="text"/>			
(b) Anyone else can be classified as a "visitor".	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If Disagree, please explain why:			
<input type="text"/>			

6. What type of Liquor Permit, if any, should be available to the following:

	No Permit	Restricted Permit (drink in licensed premises but no takeaway)	Full Permit (drink at licensed premises and home and can buy takeaway)
(a) Visitors to Groote Archipelago	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b) Residents at Poles 7, 12 and 13?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(c) Residents of Alyangula	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Should people living in Angurugu, Umbakumba, Milyakburra and satellite communities be able to apply for Restricted Permits?

Yes	No	Don't Know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If No, please explain why:		
<input type="text"/>		

8. Do you have any other comments about the type of permit people can apply for according to where they live?

9. Do you agree that future plans should extend the Permit system to workers, visitors and residents in the s19 areas being developed (around Little Paradise Bluff)? Note that implementation will only occur as each development is completed and that applications for new retail alcohol outlets will be made to the NT Liquor Commission as needed and according to legislation.

10. How important are each of the following concerns when thinking about allowing Restricted Permits to community members living outside the Alyangula area?

	Not at all important	Somewhat Important	Important	Very Important	Don't Know
People returning to community after drinking in Alyangula and becoming disruptive, abusive and dangerous to others.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Drinkers not in a fit state to return to community and being without other places they can go to stay safe and not be a nuisance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Drinkers not having access to reliable transport so they can leave Alyangula after drinking and end up being stuck in the township.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. What practical solutions could be taken to address each of these concerns?

Drinkers returning to community and becoming disruptive, abusive and dangerous.

Drinkers not in a fit state to return to community having no other place to go to be safe and not be a nuisance.

Drinkers not having reliable transport so they can end up getting stuck in Alyangula.

12. Should these considerations be part of the permit application process? Should individuals have to prove these problems will not occur?

- ☐ Yes
- ☐ No
- ☐ Don't Know

Comment:

13. Are there any other practical issues or risks that need to be considered when thinking about allowing Restricted Permits for community members outside Alyangula and nominated Poles?

14. It is proposed for the Groote Eylandt Liquor Permit Committee (GELPC) that:

- Its role is to review, consider and provide informed advice and recommendations to the Director of Liquor Licensing about individual permit applications and variations, suspensions or revocations.
- Recommendations to be achieved by consensus.
- The Chair will be a person nominated by the Liquor Licensing NT, with Police as a back-up.
- Administrative support will be provided by NT Police.
- Recommendations and meeting minutes will be forwarded to Director of Liquor Licensing as soon as possible for final decision.
- Meetings to be held monthly and may take place in Alyangula, Angurugu and Umbakumba.
- Meetings will be conducted in a culturally appropriate manner.
- The Chair and Secretariat will manage the meetings and ensure transport so members to attend.

(a) Do you have any comments on these aspects of the GALPC?

(b) Are there any other matters you think need to be considered about the operations of the GALPC?

15. Do you agree or disagree that the following should be members of the Groote Eylandt Liquor Permit Committee?

	Agree	Disagree	Don't Know
Select community members from Angurugu	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Select community members from Umbakumba	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Select community members from Milyakburra	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community member representing satellite communities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GEMCO	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Police	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health Services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anindilyakwa Community Support Program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dept of Tourism, Industry and Trade (Licensing NT)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

16. Are there any other stakeholders you think should be members of the Permit Committee?
If yes, please specify.

17. One suggested process for selecting community members for the Permit Committee involves three steps:

- (1) nominations are made by each community leadership or governing body;
- (2) rest of community then has say on supporting nominations or not;
- (3) final selection from nominations made by leadership or governing body.

	No	Yes	Don't Know
(a) Do you think there are any problems with this process?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Please provide details:			
<input type="text"/>			
(b) Do you think there is a better process or method that might be used?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Please provide details:			
<input type="text"/>			

18. Which of the following documents have you read?

- ☐ Groote Archipelago Alcohol Policy **DISCUSSION PAPER**
- ☐ GROOTE ARCHIPELAGO LIQUOR PERMIT SYSTEM: **INTERIM REPORT**
- ☐ I have not read either of these documents

19. Are there any other comments you wish to make about Liquor Permits for the Groote Archipelago?



There are no more questions. Thank you for completing the survey. Your feedback will help guide a final report on the Liquor Permit system and an updated alcohol policy for the Groote Archipelago. Your time and participation is appreciated.