

Section 46(1) Submissions

Applicant:	BJ Cahoots Pty Ltd atf the Joli Trust
Application:	Special Facility Licence (Works Canteen)
Premises:	Saltbush Pastoral Company

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1 Introduction and background

1.1 Introduction

- (a) The Applicant has made an application (**Application**) to the Licensing Authority for a Special Facility Licence for the purpose of “Works Canteen” for its existing work camp, which trades as the Saltbush Pastoral Company, located at 227 Mount Monger Road, Emu Flat (**Camp**).
- (b) As part of the Application the Applicant is required to provide submissions on why the Special Facility Licence sought under the Application is the most suitable and appropriate type of licence for the proposed manner of trade. This document addresses that requirement.

1.2 About the Application

- (a) The Application is required as the Applicant would like to sell and supply liquor to workers who stay at the Camp and their guests:
 - (i) in the Camp’s Wet Mess (**Wet Mess**) for consumption on the Wet Mess; and
 - (ii) as packaged liquor from the Wet Mess for consumption in accommodation.
- (b) Details of the Camp and the proposed manner of trade are provided at **clause 3** of this document.

2 The legislative framework

2.1 Section 46 and 46A

- (a) The prerequisites for the grant of a Special Facility Licence under the Act are set out in sections 46 of the Act. The relevant provisions are set out below:

“46. Special facility licence, pre-requisites for grant of

- (1) *The licensing authority shall not grant a special facility licence except for a prescribed purpose.*
- (2b) *The application for a special facility licence must demonstrate how the business for which the licence is sought meets any of the prescribed purposes for which a special facility licence may be granted.*
- (3) *If a special facility licence is granted, it must be granted on such terms and conditions as are necessary to ensure that the licence is used only for the prescribed purpose for which it is granted.”*

2.2 The prescribed purposes

- (a) The prescribed purposes relevant to section 46 are specified in Regulation 9A of the Liquor Control Regulations 1989. Currently there are 15 purposes including the following:

“Works Canteen

“(1) A special facility licence may be granted for the purpose of allowing the sale of liquor at a works canteen, or at other specified premises, to workers and their guests.”

(b) The following defined terms apply to the purpose of “Works Canteen” under Regulation 9A:

- (i) “specified” means specified in the licence.
- (ii) “works canteen” means a canteen located at or near the place where a specified project is being undertaken or a specified business is being carried on, catering for the needs of workers.
- (iii) “worker” means a person who is working on a specified project or working for a specified business.

(c) Central to the definition of “works canteen” are the words “canteen”, “business” or “project”. None of these words are defined by the Act or by the Interpretation Act 1984 (WA). Nor is any statutory definition provided for these terms. Therefore, the meanings of these words are a question of statutory construction.

(d) Relevantly:

- (i) Section 10 of the Interpretation Act 1984 (WA) provides that *“words in the singular number include the plural and words in the plural include the singular”*. Accordingly, a “specified project” can be more than one project, and a “specified business” can be more than one business.
- (ii) Section 17 of the Interpretation Act 1984 (WA) provides that *“or”* is to be *“construed disjunctively and not as implying similarity unless the word “similar” or some other word of like meaning is added.”* That is, one or both options of “specified business” and “specified project” can apply.

(e) In the absence of a specific legal meaning the everyday or common meaning of a word can be applied. There are a number of meanings associated with the word “canteen”. The Cambridge dictionary lists a number of meanings for the word “canteen” including:¹

“a place in a factory, office, etc. where food and meals are sold and can be eaten often at a lower than usual price”

“a bar or social club for soldiers, which sometimes also serves simple food”

“a small shop that sells food, drinks, and sometimes other things, especially at a military camp, office, school, etc”.

(f) By construction, Regulation 9A(1) allows premises other than a “works canteen” to be approved. The words *“or at other specified premises”* enables the Licensing Authority to grant a licence to other premises, provided that such

¹ <https://dictionary.cambridge.org/dictionary/english/canteen>

premises is specified in the licence, and that the premises caters to workers and their guests.

- (g) The onus is on an applicant to demonstrate that it the prescribed purpose is met.² It is observed that a special facility licence may be granted for more than one purpose.³

2.3 The public interest requirement

- (a) Under the Act, applicants for certain applications for the grant or removal of a licence must satisfy the Licensing Authority that the grant of the application is in the public interest.⁴ The relevant applications are those that are prescribed or the Director of Liquor Licensing determines it is appropriate for the public interest requirement to apply.⁵
- (b) An application for the grant of a special facility licence is not prescribed.⁶ Therefore the public interest requirement does not apply to the Application unless the Director of Liquor Licensing exercises its discretion for it to apply.⁷

2.4 The Licensing Authority's Powers

- (a) Pursuant to Section 16 of the Act, the Licensing Authority:
 - (i) May make its determination on the balance of probabilities.
 - (ii) Is not bound by the rules of evidence or any practices or procedures applicable to courts of record, except to the extent that the Licensing Authority adopts those rules, practices or procedures or the regulations make them apply.
 - (iii) Is to act according to equity, good conscience and the substantial merits of the case without regard to technicalities and legal forms.
- (b) It is incumbent on the Licensing Authority to evaluate the material before it and make findings of fact and draw conclusions from the material that is sufficient, relevant and probative, including by inference.⁸
- (a) If the Application is granted, terms and conditions may be imposed by the Licensing Authority to ensure that the licence is only used for the purpose of selling liquor to workers who are working on a specified project or for a specified business, and their guests.
- (a) In considering the meaning of the terms, it is critical that the context of the text is considered, in its widest sense, including the general purpose and policy of the provision.⁹ It is also incumbent on the Licensing Authority to ensure that the objects of the Act are met.

² Sand Volley Australia Pty Ltd v Director of Liquor Licensing [2019] WASC 209, Strk J at [39]

³ Decision of Director of Liquor Licensing A701138976 in relation to The Picadilly

⁴ Sections 38(1) and (2)

⁵ Section 38(1)

⁶ Regulation 9EA and F

⁷ Section 38(1)

⁸ Woolworths Ltcd v Director of Liquor Licensing [2012] WASCA 227 at [84]

⁹ Parker v City of Rockingham [2021] WASCA 120 [48-53], Buss P, Murphy & Vaughan JJA

2.5 Banned Drinkers Area Exemption

- (a) The Camp is located in the Goldfields area, which is a declared Banned Drinkers Area.¹⁰ However, if the Application is granted, the licence will be of a type that is excluded from the Banned Drinkers Area.¹¹ This means the requirements of the Banned Drinkers Register will not apply.

3 About the Camp

3.1 General

- (a) Established in 2004 by the Applicant, the Camp is a purpose-built camp that provides accommodation and associated services and facilities to workers who work for nearby businesses or projects.
- (b) The Applicant owns and operates the Camp business, and all associated infrastructure. It occupies the Camp under a Pastoral Lease.
- (c) Currently the Camp provides:
 - (i) Accommodation for 100 people.
 - (ii) 24 hour kitchen/dining services and facilities.
 - (iii) Gym.
 - (iv) Recreation Room.
- (d) Below is an aerial image of the Camp.



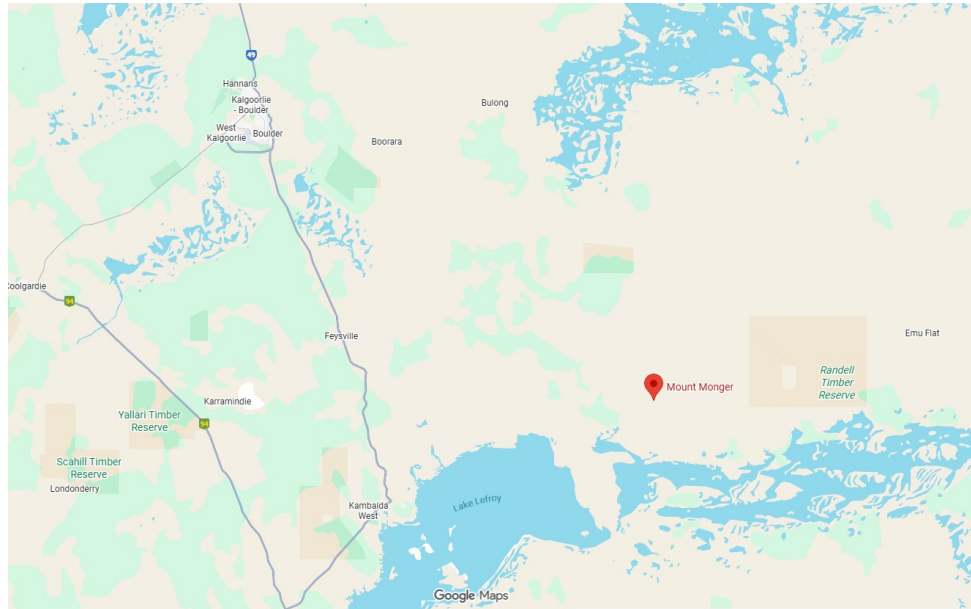
Source: Apple Maps

¹⁰ <https://www.dlgsc.wa.gov.au/racing-gaming-and-liquor/liquor/banned-drinkers-register>

¹¹ Regulation 29 Liquor Control Regulations 1989;
<https://www.dlgsc.wa.gov.au/departments/publications/publication/special-facility-licences#Works-canteen>

3.2 Location

- (a) The Camp is located in Emu Flat, near to Mount Monger, in the Mount Monger goldfields region of Western Australia, approximately 50 km south east of Kalgoorlie. It is in a remote location as shown in the aerial images below. Kalgoorlie is the closest, accessible town by road.



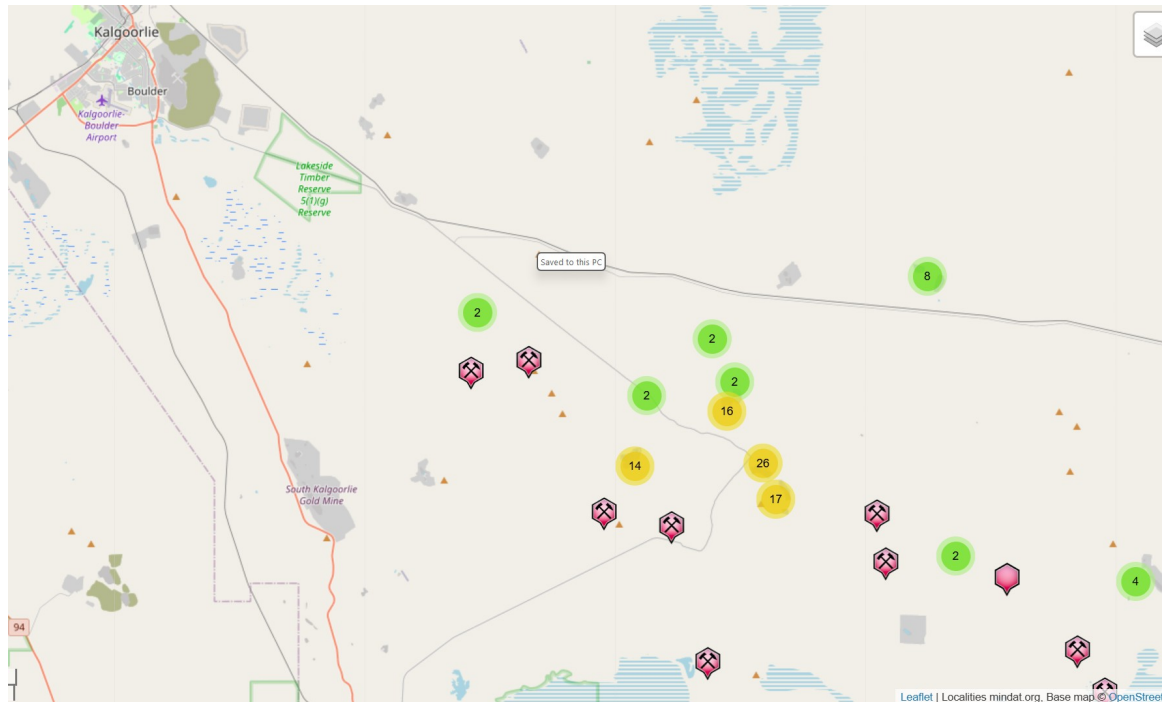
Source: Google maps



Source: Google maps

- (b) Mount Monger and its surrounds has significant gold deposits. Mining activity started in the area in 1895.¹² Currently a large of large mining and exploration activities operate in the area, including the Daisy, Mount Belches and Aldiss gold mines operated by Mount Monger Gold Operations.¹³
- (c) MinDat is a provides information on mines around the world (www.mindat.org). Below are screenshots of maps which show the current mine operations within the Mount Monger goldfields recorded by MinDat. Note:
- (i) The  symbol indicates a single mine.
 - (ii) The number in the green and yellow circles indicates the number of mines at that location at the scale of the map. Green is used when there number is less than 10 and yellow where there is more than 10.
 - (iii) The Camp is located near to where the Number 26 in a yellow circle is shown on MinDat Map 1 below, at the end of Mount Monger Road (refer also the map at **clause 3.2(a)**).
 - (iv) The Daisy Milano mine is located within the cluster of mines shown in Mindat Map 1 as Number 26 in a yellow circle. A more detailed view is shown in MinDat Map 2.

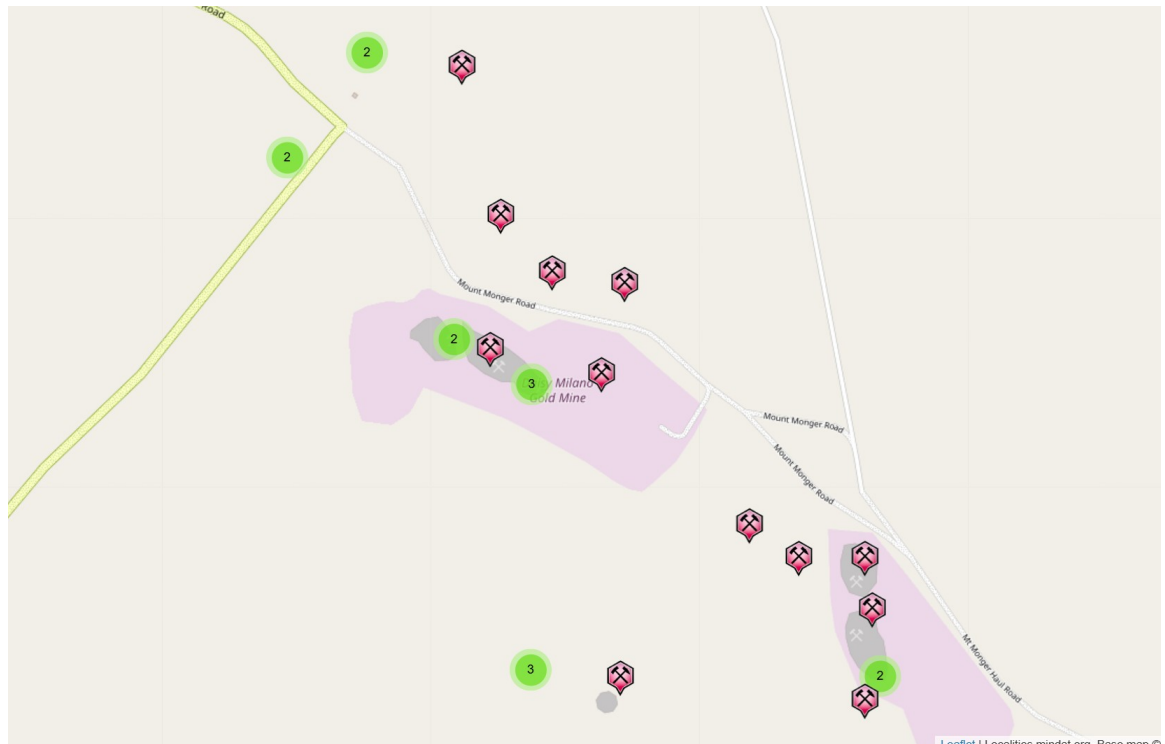
MinDat Map 1



¹² www.mindat.org

¹³ <https://www.vaultminerals.com/operations/mount-monger>

MinDat Map 2



3.3 Camp Residents

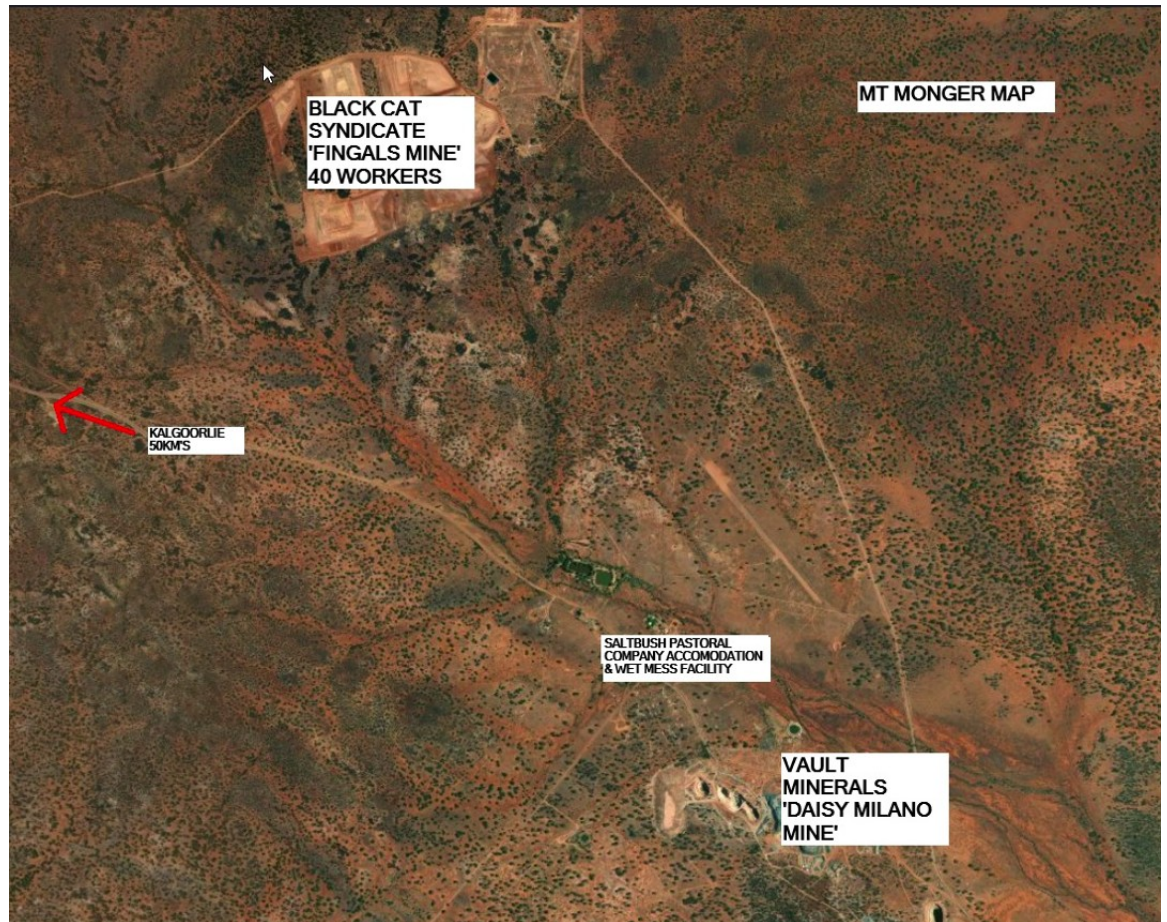
- (a) As indicated above the Camp provides accommodation for workers of nearby mining businesses or projects. It also provides accommodation for workers of Mount Monger Station. Attached as **Annexure 1** is a list of companies undertaking work in the Mount Monger area who booked accommodation at the Camp for their workers in the six month period from 1 December 2025 to 31 May 2026.
- (b) In total 2,328 workers were accommodated:
 - (i) 1,685 workers (72%) worked at the Fingals Open-Pit Gold Mine. This mine is located approximately 3km from the Camp. Its location is in the area shown as Number 16 in the yellow circle in the MinDate Map 1 above (refer also the map at **clause 3.3(d) below**). This mine is owned by The Black Cat Syndicate. Mineral Mining Services was awarded a three year, full mine services contract to carry out mining operations at the mine which commenced in September 2025.¹⁴
 - (ii) 201 workers (9%) worked at the Daisy Milano Gold mine. This mine is located approximately 4km from the Camp. Its location is shown in MinDat Map 2 above (refer also the map at **clause 3.3(d) below**). The mine is owned by Vault Minerals and MacMahon Holdings is currently contracted

¹⁴ <https://im-mining.com/2025/08/06/mms-awarded-three-year-services-contract-at-black-cat-syndicate-gold-mine/>

to carry out mining operations.¹⁵ Other companies and businesses contracted as part of the business of the mine and whose workers work at the mine whose workers used the Camp include:

- (A) Axis Minerals.
 - (B) BWE Drilling.
 - (C) Zenith.
 - (D) Mader Group.
 - (E) Swick Mining.
 - (F) MacMahon.
- (iii) 412 workers (18%) worked at Mount Monger Station. This is a working pastoral station, the business of which is owned and operated by Saltbush Contracting. It is located approximately 1km away from the Camp.
- (iv) 31 workers (1%) worked for companies undertaking work in the Mount Monger goldfields area. These companies are predominantly doing regional drilling exploration and were as follows:
- (A) BMLV
 - (B) Evergold
 - (C) K-Drill Pty Ltd
 - (D) Orlando Drilling.
 - (E) VM Drilling.
- (c) The geographic location of the Fingals Mine and Daisy Milano Mine are shown in the map below. The location of Mount Monger Station is shown on the map at **clause 3.2(a)**. As can be seen from this map and MinDat Map 1 and MinDat 2 these projects and businesses are remotely located. The Camp is used to accommodate workers as it provides the closest available accommodation facilities. There are no other facilities available within 50km, with the next closest being in Kalgoorlie.
- (d) Given the distance involved, Kalgoorlie is not a practical day to day accommodation option for workers of these businesses and projects. In addition, Mt Monger Road, the only access road to all of these, is closed from time to time, which makes access to the area and the associated businesses and mines extremely difficult or impossible. As noted below, the mines operate 24/7, with 2 shifts daily. Therefore, having workers available and located nearby is critical.

¹⁵ <https://im-mining.com/2025/08/06/mms-awarded-three-year-services-contract-at-black-cat-syndicate-gold-mine/>



- (e) Accommodation for workers is booked by the companies for whom they work. The companies register with the Applicant via the Applicant's online booking system and make bookings for their workers as and when required. The company making the booking must provide a Camp Form with details of each person for whom accommodation is needed to the Applicant.
- (f) The Applicant is able to set up protocols in the booking system to limit bookings to specified businesses, mines or projects, or even a geographic area, if this is required.
- (g) Workers are transported to/from the Camp by their employing Mining Company. 80% of the mining personnel who stay at the Camp are fly-in/fly-out from Perth. 20% are from Kalgoorlie. However, these workers stay at the Camp when on a shift rotation due to the distance etc. as previously noted.
- (h) The usual rotations are: 2 days on/1 day off; 8 days on 6 days off; and 4 days on/2 days off, depending on the worker's job and the mine at which they work. On average the shifts are 12 hours long, with various start times between 5am-6am, and 5pm-6pm for nightshift. Nightshift workers generally finish around 4:30am in the morning.

- (i) As well as the workers staying at the Camp, there are 3 full time chefs who stay on site, plus a Camp Manager, who is on site 5 days per week.
- (j) Transportation to mine sites for workers is provided by the employing Mining Company.
- (k) Anyone who stays at the Camp has been vetted by the employing Mining Company. These checks are comprehensive and include Police and Drug and Alcohol checks. Anyone with a record is not employed, except in exceptional circumstances. If there is a historical offence recorded on the Police record (such as a juvenile offence or greater than 10 years old) prior authorisation from the relevant Mine Manager is required before the person is allowed onto the mine site. There is zero tolerance for anyone who has dealt in drugs.

3.4 Day to Day Operations

- (a) The Camp and mines operate 24 hours a day, 365 days a year, except when there is an issue.
- (b) Mining personnel are transported to the Camp by bus. Who gets on the bus is managed by the employing Mining Company and is strictly controlled.
- (c) There is only one exit and entry point to the Camp. When a bus arrives at the Camp, it stops in the Camp car park. New residents must go and register with the Camp Facility Manager. The Facilitator's Office/Reception area is located on the entry access road, directly opposite the car park. Previous residents go the kitchen and pick up their key. The same process applies for any worker who choose to drive him/herself.
- (d) Camp Rules are in place at the Camp which all residents are expected to comply with. These Rules includes:
 - (i) Zero tolerance in the Camp for drunkenness and the taking of illegal drugs by Camp residents.
 - (ii) A strict no spirits policy.

A copy of the current Rules is attached as **Annexure 2**.
- (e) Each worker is required to confirm and sign that he/she will abide by the Camp Rules before they are allowed to stay at the Camp.
- (f) In addition to the Camp Rules, each worker is required to adhere to the "Fitness for Work" of his/her employing Mining Company. A mandatory requirement common to Companies is that prior to the commencement of a shift a worker must undergo a mandatory breathalyser. There is zero tolerance for intoxication whilst on duty. If an employee is found to be intoxicated he/she is stood down immediately pending further investigation. As an example a copy of the Applicant's related company, Saltbush Contracting's Fitness for Work Policy is attached as **Annexure 3**.

4 Proposed Manner of Trade

4.1 Proposed manner of trade

- (a) As indicated earlier, the Applicant would like to sell and supply liquor to workers who stay at the Camp and their guests:
 - (i) in the Camp's Wet Mess for consumption on the Wet Mess; and
 - (ii) as packaged liquor from the Wet Mess for consumption in accommodation.
- (b) Workers who stay at the Camp currently source their own liquor. Kalgoorlie is the closest place where workers staying at the Camp can go for both on-premises and off-premises liquor purchases. This involves a 100km, 2 hour round trip (50km/1 hour each way) and presents a high level of potential risks given the distance and isolation of the Camp. In particular:
 - (i) There is a high risk of drink driving. Just recently, in April, there was an incident in the Goldfields when a mine worker was killed and his passenger seriously injured from a car rollover when they were returning to their work camp after socialising in Kalgoorlie.¹⁶
 - (ii) The Applicant is unable to control the level and manner of alcohol consumption, or the volume of alcohol purchased, when workers source their alcohol from outside the Camp.
- (c) The proposed Wet Mess is a separate building on the south side of the Camp. Currently it is being used as a Recreation Room.
- (d) The area is approximately 6m x 12m in size and includes a large room and a verandah that is covered and partially enclosed with shade cloth. Below are photographs showing the area as it is set up currently:



¹⁶ <https://www.msn.com/en-au/news/australia/worksafe-investigates-fatal-crash-on-mine-access-road-in-was-goldfields/ar-AA20nMk4>

- (e) The Applicant intends to refurbish the area to create a relaxing bar/lounge area where workers can eat, drink, relax and socialise. Planned renovations include:
 - (i) Repainting the premises.
 - (ii) Replacement of the flooring.
 - (iii) Inserting new sinks, TV and new furniture, such as bar tables and bar stools.
 - (iv) Installation of a barrier on the unenclosed portion of the verandah.
- (f) Food services will be available in the Wet Mess during all trading hours and will include simple hot food and snacks, such as:
 - (i) Pizza oven and pizzas.
 - (ii) Pies.
 - (iii) Sandwiches.
 - (iv) Toasties.
- (g) Only bar service of liquor and other beverages will be offered (no table service). The bar area from which liquor will be served and supplied will be within a separate, designated area within the main room. Only staff will be able to access this area.
- (h) Proposed trading hours of the Wet Mess are Monday to Sunday, 5:00am to 7:00am and 4:30pm to 8:30pm. The morning hours are required to cater for workers who come off the night shift.
- (i) Toilet facilities are within close proximity to the Wet Mess. In addition, each accommodation room has an ensuite.

4.2 Responsible service of liquor

- (a) The Applicant is committed to the responsible service of alcohol at the Wet Mess should the Application be granted.
- (b) Measures will be put in place by the Applicant to ensure any liquor sold and supplied at the Wet Mess is done responsibly: in compliance with responsible service of liquor practices; the Act and the Licensing Authority's requirements.
- (c) Only single serve, alcoholic drinks will be available for purchase and consumption at the Wet Mess. This means that staff will be able to assess and monitor a person when they make a purchase and no glasses will be required as each drink is packaged in a bottle or can, ready for consumption.
- (d) In the operation of the Wet Mess the Applicant will adopt the Chamber of Minerals & Energy of Western Australia Industry Alcohol Guidelines in the operation of the Wet Mess. These include:
 - (i) A four (4) drink limit over a 24 hour period.
 - (ii) Providing a range of beverage options, that include non-alcoholic, low and mid strength.

A copy of the Guidelines is attached as **Annexure 4**.

- (e) While there will be a selection of food available for purchase at the Wet Mess,, more substantial meals will be available during the majority of the proposed trading hours of the Wet Mess from the Camp Kitchen and Dining Room. These are:
 - (i) Breakfast (including takeaway lunch crib): 3:45am to 7:00am.
 - (ii) Dinner: 3:45pm to 7:00pm.
- (f) Juveniles will not be permitted on the Wet Mess, except in accordance with the Act.
- (g) For packaged liquor sales, the Applicant will also only offer single serve drinks, limited to 4 per purchase.
- (h) All staff serving and supplying liquor at the Wet Mess will be required to be suitably qualified. Given resident numbers in the Camp are relatively small, staff quickly get to know everyone, as they often have multiple duties around the Camp.
- (i) Brendan Jones, the Director of the Applicant, will be obtaining his Approved Manager's certification. The Applicant will also, at its cost, arrange for each of the 3 full time Chefs and the Camp Manager to become certified to ensure there are more than sufficient Approved Managers on site at any one time.
- (j) As noted above, in addition to the harm minimisation measures to be put in place by the Applicant, each worker staying at the Camp is required to abide by the Camp Rules and their employing Mining Companies' "Fitness for Work" policy.

5 Addressing the legislative requirements

5.1 Satisfying the prescribed purpose

- (a) For the purposes of the Application and Regulation 9A(1) the Applicant submits that:
 - (i) the Wet Mess constitutes a "works canteen"; and
 - (ii) the businesses and projects are the mining projects, businesses in the Mount Monger goldfields area and the Mount Monger Station business as detailed in **clauses 3.2(c) and 3.3(a) to (c)** in this document.
- (b) The following supports that the Wet Mess falls within the scope of being a "works canteen":
 - (i) It is a venue that will provide, for purchase, food and drinks by residents of the Camp. This is consistent with the common, every-day meaning of "canteen".
 - (ii) The Wet Mess forms part of the services and facilities of the Camp which specifically caters to the needs of workers of businesses and projects located near to the Camp within the Mount Monger goldfields area. In

particular to the workers of: the Fingal Gold Mine; the Daisy Milano Gold Mine and Mount Monger Station.

- (iii) Only workers of these nearby businesses and projects are able to stay at the Camp and will be able to use the Wet Mess.
 - (iv) The proposed trading hours of the Wet Mess align with workers' shifts and rosters (i.e. they coincide with workers usual shift start and end times).
- (c) In satisfying the criteria of a "specified project or specified business" in the definition of "works canteen" the Applicant submits:
- (i) The definition of "works canteen":
 - (A) is not disjunctive and does not restrict a works canteen to cater to either the workers of a specified project or to the workers of a specified business (i.e. one or both may be specified); and
 - (B) may apply to a number of specified projects or specified businesses.
 - (ii) "Specified" means specified in the licence, which means there is flexibility and discretion as to the relevant projects or businesses, provided that they are "located at or near to the place" where such projects or businesses are carried on.¹⁷ In the case of the Application this could apply in a number of ways, as considered appropriate by the Licensing Authority. At its broadest the specified businesses and projects could be the mining projects and businesses located in the Mount Monger goldfields region and Mount Monger Station. Or a geographic area can be specified (e.g. mining projects and businesses located within 30km of the Camp). Or, relevant businesses and projects can be listed (such as those identified in **clause 3.3(b)**). However, given the extent of mining operations in the area as demonstrated at **clause 3.2(c)** and in MinDat Map 1 and MinDat Map 2, the Applicant would prefer broader specificity.
- (d) In the alternative, if the Licensing Authority considers the Wet Mess does not constitute a works canteen, the Applicant submits that the Wet Mess can be a "specified premises". The Wet Mess will cater to workers and their guests as detailed in this document, being a key requirement. Furthermore the circumstances, nature and function of the Wet Mess satisfy the other criteria of Regulation 9A.
- (e) The Applicant further submits that:
- (i) There is no requirement under Regulation 9A(1) that a works canteen is owned or operated by the employer of the workers to whom the works canteen caters to.
 - (ii) Access to the Camp and the Wet Mess, is, and will continue to be strictly controlled. It is not open to the general public.

¹⁷ Regulation 9A(3)

- (iii) Due to the remote location of the mining projects and businesses, the Camp provides the only accommodation services and facilities for workers that is located nearby.

5.2 Other licence categories

- (a) No other category of licence is suitable or appropriate to the proposed manner of trade for the following reasons:
 - (i) The Wet Mess will not be open to the general public. An inherent feature of other categories of liquor licences that permit the sale of packaged liquor such as a hotel, tavern, liquor store and producer's licence is that entry to the premises is available to the general public and service may only be refused in certain circumstances (refer in particular section 115 of the Act).
 - (ii) A producer's licence is not relevant as the Applicant is not a liquor producer.
 - (iii) A wholesaler's licence is not appropriate as the Applicant wants to sell liquor on a retail basis to workers and their guests staying at the Camp, not liquor merchants.
 - (iv) A small bar licence does not permit the sale of packaged liquor.
 - (v) Tavern, hotel and restaurant licences require a kitchen, on site toilets and ancillary services and facilities. None of these will be offered at the Wet Mess, although kitchen/dining and toilet facilities will be within close proximity in the Camp.
 - (vi) A club and club restricted licence is not applicable as this is only available to an established, bona fide club. That is, a body or group of persons who have joined together for the purposes of a sporting, social, political or other aim. The Applicant is not a club.
 - (vii) A nightclub licence is not appropriate as the Wet Mess will not be a nightclub. It will be a wet mess in a work camp.
 - (viii) A casino licence is not appropriate as the Wet Mess will not be a casino. As noted above, it will be a wet mess in a work camp.
- (b) In the event the Licensing Authority considers the Application ought not be granted on the grounds that another class of licence would achieve the purposes for which the licence is sought, the Applicant requests the Licensing Authority exercise its power under Section 46B of the Act.

5.3 Satisfying the objects of the Act

- (a) The grant of the Application will advance the primary objects of the Act in the following ways:
 - (i) It will facilitate the regulation of the sale, supply and consumption of liquor within the Camp as it will enable the Applicant to control, manage and supervise the sale and supply of liquor within the Camp by workers. This will create a safer environment within the Camp.

- (ii) The risk of liquor related harms will be reduced and minimised due to the comprehensive harm minimisation measures and strategies to be put in place by the Applicant. The sale of liquor for consumption within the Wet Mess will be strictly controlled and monitored and purchase limits will apply. Also the risks associated with workers currently driving to and from Kalgoorlie to drink and source liquor will be reduced (as workers will be able to obtain liquor at the Camp).
- (iii) Consumer requirements for liquor and related services will be met. The simple reality is that workers staying at the Camp like to have an alcoholic drink. As liquor is not currently available at the Camp, they go into Kalgoorlie. This creates a high risk of potential issues, especially the risk of drink driving.

5.4 Voluntary Condition

- (a) The Applicant is agreeable to a condition being placed on the licence, that expressly confines the operation of the licence to the purpose under Regulation 9A(1).
- (b) Given the extent of the mining operations in the Mount Monger goldfields area the Applicant would prefer any proposed condition be broad based, as set out in **clause 5.1(c)(ii)**.

6 Conclusion

- (a) The proposed licence is specifically for the purpose of providing liquor hospitality services to workers who stay at the Camp.
- (b) The Camp is a highly controlled environment. All residents stay at the Camp for the sole purpose of accommodation while they are on a work shift. They are not there for a holiday or for recreational pursuits. The sale and supply of liquor will be restricted and supervised at all times.
- (c) The Applicant submits that:
 - (i) the nature of the Camp, the Camp Rules, the Applicant's harm minimisation measures and other mechanisms will ensure the risk of alcohol related harms resulting from the grant of the Application will be minimised;
 - (ii) the grant of the Application is consistent with the objects of the Act;
 - (iii) the category of licence sought is appropriate; and
 - (iv) the specific circumstances of the Application and material facts established by the Applicant support the grant of the Application,and given the above, the Application ought to be granted.

ANNEXURE 1 – ACCOMMODATION BOOKINGS

Company Activity Summary

Date: 01 Dec 2025 To 31 May 2026

Property: Mount Monger Homestead	Company: Multiple	Report Type: Summary	Include Group Master: No	On Transaction Date: No	Group By Company Grouping: No
Company	No Of Res	No Of Room	Nights	Accomm Revenue	Discount
Axis Mineral Services	3	3	19	0.00	0.00
Black Cat Syndicate	1637	1637	13452	0.00	0.00
BMLV	1	1	9	0.00	0.00
BWE Drilling	10	10	14	0.00	0.00
Evergold	5	5	31	0.00	0.00
K-Drill Pty Ltd	14	14	111	0.00	0.00
MacMahon	67	67	389	0.00	0.00
Mader Group	3	3	15	0.00	0.00
Mineral Mining Services	47	47	290	0.00	0.00
Orlando Drilling	2	2	8	0.00	0.00
Saltbush Contracting	412	412	5401	0.00	0.00
Swick Mining	100	100	849	0.00	0.00
VM Drilling	9	9	47	0.00	0.00
Zenith	18	18	57	0.00	0.00
Total:				0.00	0.00
Grand Total:				0.00	0.00

Code:

C - Cancelled Reservation with [Operational Revenue Calculations](#)

NS - No Show Reservation with [Operational Revenue Calculations](#)

D - Reservation Departing on From Date of Report with [Operational Revenue Calculations](#)

These Reservations will only Contribute to the Revenue totals and will not be included in the Reservation or Night totals

ANNEXURE 2 – CAMP RULES



Welcome to Saltbush Pastoral Company Camp

Mount Monger Station, Mount Monger Road, Kalgoorlie
Contact Details Office: Phone: 08 6164 9808 Email: camp@saltbush.net

Name:	Company:	Date:
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For a harmonious accommodation environment, in a remote working location such as this, there are rules that **you must abide by**.

Contact Hours:

0700 to 1630 at the Office (08 6164 9808)
1630 to 1930 at the Homestead (0427 934 765)

When You First Arrive:

Contact our team at the office, or the homestead, keys can be issued (charged out at \$15 per key when lost) taken to your accommodation, shown the parking area and familiarised with the facilities.

Food Allergies:

It is imperative you inform us of any food allergies such as seafood or nut intolerance.

Meals:

Breakfast (including takeaway lunch crib) 3:45 am - 7:00am
Dinner Night Shift - 15:45pm - 17:00pm Day Shift 18:00pm - 19:00pm

YOU ARE REQUIRED TO BE IN CLEAN CLOTHES AT MEAL TIMES.

Please avoid unnecessary food waste. "Take all you want, BUT eat ALL you Take"

Alcohol and Drugs:

Drunkenness and taking illegal drugs will not be tolerated. This behaviour will be reported to your employer and/or the police. The Saltbush Pastoral Company Camp and Accommodation is strictly a **no Spirits** (i.e.: Rum or Scotch) site. Beer, cider and wine are permitted. It is encouraged that all employees and contractors drink responsibly at end of shifts and shift change days. All employees are required to produce a 0.00%BAC sample at the start and throughout the duration of their shift. With the effects of alcohol, Aggressive behaviour towards anyone (including other contractors) will not be tolerated.

The directors of Saltbush take no responsibility if your alcohol or other drinks go missing. Please clearly mark your property.

Quiet Enjoyment:

All residents have the right to be accommodated in an environment that respects the rights of others and conforms to the normally expected standards of behaviour. If your behaviour is affecting others quiet enjoyment, you may have your accommodation withdrawn. **Quiet time begins strictly at 21:00 (9:00pm). You must be aware and considerate of night shift residents sleeping through the day, and remember that there is always someone who will be going to work whatever day of the week it is the following day.**

Parking:

Please don't park anywhere in the main compound, main entrance or near any drive through roads. This is a working station with trucks, heavy machinery, people and children using this homestead and its accommodation. PLEASE ASK the team at the office to tell you where to park as this depends on your shift.

Resident Visitors:

For reasons of security and safety, a system of authorisation shall operate at the Mount Monger Homestead and Camp. If you wish to have visitors, please contact the office for the authorisation process.

Reporting Defects:

Please advise the office of any faults, defects or breakages during office hours. We will have the item attended to as soon as possible.

Hygiene and Sanitation:

You are required to leave laundry, toilet, washing and shower facilities in a reasonably clean condition after use. Unsanitary use of any facility, and acts against acceptable hygiene standards is not acceptable. You must maintain a high level of personal hygiene. Please note all instances of infectious disease whether real or suspected, must be reported immediately to the office for the safety and protection of other guests.

Personal Property:

[https://saltbushcontracting.sharepoint.com/sites/SaltbushContracting/Data/HR OH & S/HR/1. New Employee/3. New Employee Paperwork \(Contract Signed\)/SB-HR-FORM-008 Accommodation Rules Acknowledgement.docx](https://saltbushcontracting.sharepoint.com/sites/SaltbushContracting/Data/HR%20OH%20&%20S/HR/1.New%20Employee/3.New%20Employee%20Paperwork%20(Contract%20Signed)/SB-HR-FORM-008%20Accommodation%20Rules%20Acknowledgement.docx)
Tuesday, 03 November 2021

You should consider insuring your personal belongings against fire, theft etc. Saltbush does not accept any responsibility for any claims made in this respect.

Saltbush Property:

Anyone found maliciously damaging or stealing property of Saltbush will have their employer informed immediately and will be prosecuted.

Rubbish:

You are required to dispose of all litter and rubbish in the litterbins provided around the facilities. These are removed twice a week.

Acceptance of Risk:

Each resident expressly accepts that residency and use of the facilities, is at the guests own risk. Saltbush accepts no responsibility or liability for any loss, damage or injury suffered by a guest, whether to the resident's person or property as a result of any breakage, leakage, theft or other event in or around these facilities.

Emergencies:

In case of an emergency please contact either the Office or the Homestead (depending on the time of day/night) and a Saltbush Representative will provide the necessary emergency response.

Smoking:

Smoking & Vaping is not accepted in any accommodation or enclosed building in or around the Homestead, Camps or Saltbush complexes of any description. There is also a total non smoking policy for **ALL** vehicles and equipment. This is in compliance of the Occupational Health and Safety Regulations.

Room Cleaning:

Saltbush housekeeping staff work diligently to ensure your room is cleaned weekly. Cleaning is important not only from the point of hygiene but also for safety and security. The room allocated is for your convenience, please keep your room clean, so our Housekeeping Staff can clean it for you.

If our Camp is full and you are hoteling with a co-worker, you must pack up all your gear and vacate the room the morning you are due to depart. Please store belongings where instructed so the room can be exit cleaned for the next guests' arrival that day. At the end of your shift showers are available in the bathroom block.

Registration Form

Please print in BLOCK LETTERS:

First Name:	Last Name:	
Any food allergies or medical issues we need to know about?		
Vehicle Make:	Registration:	Room No Allocated (Camp Coordinator use):

Declaration:

I understand that by signing this form, I agree to follow the rules as set by Saltbush and confirm all information provided is true and correct. I understand that if I breach the rules, I may have my accommodation removed. I acknowledge that aggressive behaviour towards Saltbush team members and staff or other guests will not be tolerated. I acknowledge that if I fail to return my key, or lose my key, I will be charged a fee of \$15.00. I and/or my employer will be responsible for any wilful damage that I cause to the Saltbush Camp and/or the facilities provided to me.

Signature	Date
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ANNEXURE 3 – FITNESS FOR WORK POLICY EXAMPLE



FITNESS FOR WORK POLICY

Saltbush Contracting is committed to providing and maintaining a safe and healthy working environment by promoting Fitness for Work programs. These initiatives aim to eliminate or effectively control risks associated with factors such as alcohol and drug misuse, fatigue, medical conditions, poor nutrition and lifestyle choices, stress, and personal or family issues.

We recognise that the safety and wellbeing of individuals in the workplace largely depend on their own actions and their commitment to not endanger themselves or others. As such, all Fitness for Work programs—along with any updates or changes—will be clearly communicated to employees, contractors, and visitors to ensure awareness and personal accountability.

To support this commitment, Saltbush Contracting will implement the following measures, in collaboration with employees and contractors, to promote overall health, wellbeing, and safety at work:

- Health Assessments – Conducted pre-employment and periodically as required.
- Fatigue Management – Including management of shift work, overtime, and travel arrangements.
- Drug and Alcohol Management – Through awareness training, testing, and case management programs.
- Ergonomics – Focused on safe and appropriate use of plant, equipment, and office setups.
- Occupational Rehabilitation and Return to Work Programs – To support recovery and reintegration into the workplace.
- Promotion of Responsible Behaviour – Encouraging safe and healthy practices among all personnel.
- Policy Compliance Monitoring – Ensuring understanding and enforcement of this policy across all levels.
- Fair and Effective Procedures – For managing individuals who are deemed unfit for work.

Saltbush Contracting values the active participation of all workers in maintaining a safe and productive workplace. Through shared responsibility and commitment, we aim to foster a culture of health, safety, and wellbeing.

PeopleSense – Saltbush Employee Assistance Program Provider

The Employee Assistance Program (EAP) is a free, professional and confidential counselling service available to all Saltbush Contracting Pty Ltd employees paid for by Saltbush Contracting. The service can be used for any work or personal issues that may be impacting on your general wellbeing or Fitness for Work, and you have access to six counseling sessions every 12 months.

FITNESS FOR WORK POLICY

PeopleSense employ experienced and qualified registered/clinical/counselling psychologists who are friendly, caring and focused on providing practical solutions. PeopleSense have offices throughout Australia, including metropolitan and regional Western Australia, and can provide sessions face to face, over the telephone or via Skype.

More information on the EAP service provided by PeopleSense by Altius, including office locations, contact details, and other useful mental health resources can be found on their website – www.peoplesense.com.au or via the Saltbush HSE and Human Resources Departments.

This policy is applicable to all Saltbush Contracting personnel and contractors conducting business at Saltbush Contracting worksites.



BRENDAN JONES
DIRECTOR
Saltbush

ANNEXURE 4 – CHAMBER OF MINERALS & ENERGY OF WA INDUSTRY ALCOHOL GUIDELINES



SAFE AND RESPECTFUL BEHAVIOURS – INDUSTRY ALCOHOL GUIDELINE

Background

The health and safety of our people, including their physical and psychological safety, is the number one priority for the WA resources sector. Industry has been clear in our commitment to continue to work hard to eliminate any instance of behaviours that threaten people's personal and psychological safety at work.

The Chamber of Minerals and Energy of Western Australia (CME) recognises that factors such as alcohol use and the remote nature of resources sector operations requires the management of risk factors for both the workplace and work-adjacent environments, such as company owned accommodation facilities. More broadly, work-adjacent environments refers to places, activities and events where a person is present in connection to their employment. For example, conferences, informal after work events, or during work-related travel. While drug and alcohol policies are already widely implemented across West Australian workplaces, further consideration has been required for work-adjacent environments.

Through CME's [Safe and Respectful Behaviours](#) (SARB) Working Group, an independent third-party subject matter expert was engaged to provide advice to industry on best practice for the management of alcohol on remote resources sector operations, 360Edge provided the SARB Working Group with a background paper, *Alcohol Policy in the Resources Sector* (the 360Edge Background Paper). The 360Edge Background Paper includes evidence-based advice to support the development of an Industry Alcohol Guideline (the Industry Guideline). The Industry Guideline has been assigned to the SARB Working Group by CME's Workplace Health and Safety Committee and Diversity & Inclusion Reference Group.

On 10 May 2022 the Industry Guideline was endorsed by CME's Advisory Board. The Industry Guideline has been shared with all CME members and will be shared with other industry representatives for wider implementation across the sector. Further examples of best practice initiatives will continue to be updated within the [Implementation Framework – Eliminating Sexual Harassment in the WA Resources Sector](#).

SAFE AND RESPECTFUL BEHAVIOURS – INDUSTRY ALCOHOL GUIDELINE

Scope

The Industry Guideline applies to company owned or operated resources sector accommodation facilities within Western Australia. Companies may choose to apply elements of the Industry Guideline for behaviours at broader work-adjacent settings – including places, activities, and events where a person is present in connection to their employment.

This Guideline is not intended to apply to private residences of workers, even if those residences are owned by the company or leased in the name of the company.

Requirements

Serving Alcohol: Applicable to accommodation facilities that serve alcohol to residents.

- Implementation of a 4-drink limit for all residents over a 24-hour period. This includes takeaway limitations.^{i, ii, iii, iv}
- Prohibition of alcohol served in a form that encourages rapid-consumption. For example, shots or doubles.^{v, vi}
- Ensure availability of varied drink-strength options served at accommodation facilities. For example, low or medium strength beverages.^{vii, viii}
- Availability of non-alcoholic drink options such as 0% beverages, including the provision of drinking water at no cost.^{ix, x, xi}
- Availability of food options where alcohol is served. For example, snack food or hot meals.^{xii, xiii}
- Employees serving alcohol must comply with minimum legislative training requirements, including maintaining training requirements for the responsible service of alcohol.^{xiv}
- Meeting local liquor licensing requirements, including the maintenance of licenses for venues that serve alcohol.^{xv}

Facility Management: Applicable to all accommodation facilities.

- Prohibition of people being intoxicated while at accommodation facilities.^{xvi, xvii}
- Actively encourage a culture of moderation.^{xviii, xix, xx}

Supporting Initiatives: Other Initiatives to support the above requirements.

- Ensure residents are aware of the alcohol policy that applies in accommodation villages.^{xxi, xxii, xxiii}
- Implementation of education material that inform residents in accommodation facilities about the harmful effects of alcohol consumption.^{xxiv, xxv}
- Promotion of support available to reduce alcohol consumption.^{xxvi, xxvii}
- Consideration to best practice initiatives, as included in the CME Eliminating Sexual Harassment in the WA Resources Sector - Implementation Framework,

Further Information

- Alcohol Policy in the Resources Sector – 360Edge
- [Eliminating Sexual Harassment in the WA Resources Sector \(Implementation Framework\)](#) – CME
- [Industry Code on Eliminating Sexual Harassment](#) – Minerals Council of Australia
- [Respect@Work Industry Toolkit](#) – Minerals Council of Australia

References

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- ^m 360Edge Background Paper, pg. 9.
- ⁿ Cook RF, Back AS, Trudeau JV, McPherson T. *Integrating substance abuse prevention into health promotion programs in the workplace: a social cognitive intervention targeting the mainstream user*. In: Bennett JB, Lehman WE, editors. *Preventing Workplace Substance Abuse*. Washington, DC: American Psychological Association; 2003. p. 97-133.
- ^o 360Edge Background Paper, pg. 8.
- ^p Cook RF, Back AS, Trudeau JV, McPherson T. *Integrating substance abuse prevention into health promotion programs in the workplace: a social cognitive intervention targeting the mainstream user*. In: Bennett JB, Lehman WE, editors. *Preventing Workplace Substance Abuse*. Washington, DC: American Psychological Association; 2003. p. 97-133.
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- ^r 360Edge Background Paper, pg. 9.
- ^s European Foundation for the Improvement of Living and Working Conditions. *Use of alcohol and drugs at the workplace*. Dublin, Ireland; 2012.
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- ^u National Health and Medical Research Council. *Australian guidelines to reduce health risks from drinking alcohol: Practical information*. In: NHMRC, editor. 2019.
- ^v *Liquor Control Regulations 1989 (WA)*, r.14AD
- ^w *Liquor Control Act 1988 (WA)*
- ^x 360Edge Background Paper, pg. 5.
- ^y Karriker-Jaffe KJ, Room R, Giesbrecht N, Greenfield TK. *Alcohol's Harm to Others: Opportunities and Challenges in a Public Health Framework*. *Journal of Studies on Alcohol and Drugs*. 2018;79(2):239-43.
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- ^{aa} Cook RF, Back AS, Trudeau JV, McPherson T. *Integrating substance abuse prevention into health promotion programs in the workplace: a social cognitive intervention targeting the mainstream user*. In: Bennett JB, Lehman WE, editors. *Preventing Workplace Substance Abuse*. Washington, DC: American Psychological Association; 2003. p. 97-133.
- ^{ab} Shuck B, Owen J. *The health-related upside of employee engagement: exploratory evidence and implications for theory and practice*. *Performance Improvement Quarterly*. 2017;30(3):165-78.
- ^{ac} 360Edge Background Paper, pg. 9.
- ^{ad} Roche AM, Chapman J, Duraisingam V, Phillips B, Finnane J, Pidd K. *Construction workers' alcohol use, knowledge, perceptions of risk and workplace norms*. *Drug and Alcohol Review*. 2020;39(7):941-9.
- ^{ae} Lee NK, Roche AM, Duraisingam V, Fischer J, Cameron J, Pidd K. *A systematic review of alcohol interventions among workers in male-dominated industries*. *Journal of Men's Health*. 2014;11(2):53-63.
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- ^{ag} Cameron J, Pidd K, Roche A, Lee N, Jenner L. *A co-produced cultural approach to workplace alcohol interventions: barriers and facilitators*. *Drugs: Education, Prevention and Policy*. 2019;26(5):401-11.
- ^{ah} 360Edge Background Paper, pg. 11.
- ^{ai} Lee NK, Roche AM, Duraisingam V, Fischer J, Cameron J, Pidd K. *A systematic review of alcohol interventions among workers in male-dominated industries*. *Journal of Men's Health*. 2014;11(2):53-63.