

Gambling Policies Review 2015 Submissions

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Name: Roger Lewis

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

It would be better that there were far fewer gambling venues - however I have voted for the half way point - i.e. apply the sinking lid to gambling venues that sit outside the Gambling permitted area.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

The less gambling venues the better. The less they are easily accessible to communities the better.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

The less the better.

Name: Bridget Burdett

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

I think that on balance gambling venues do more harm (through their influence on people with a gambling problem that affects their lives) than good (through profits being shared with the community). They are essentially an unfair tax on disproportionately poor people. I support the number of gambling venues being reduced over time in Hamilton.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Aaron Wong

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

Moving into a new area, be it permitted there or not, could make easier the access to Gambling. This could potentially be worse than the current situation. The Sinking Lid approach must only make things better, and only Option A does this.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Kerrin Sawyer

Organisation (if applicable): 2010

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Marjorie Slater-Kaplan

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

Anything to reduce gambling in our City is worthwhile.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Stanley Wong

Organisation (if applicable): Hamilton City Council

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

If a venue is closed, they can move the same machines to their new business location but no increase in the number to pokie or TAB machines

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Proximity Restrictions:

Keeping the number of gambling locations to a minimum would be ideal to restrict gambling addictions and lower crime rates

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

Gambling venues should be kept to a minimum in a city and at the moment, we already have pubs that also have gambling machines and this also creates social and family problems.

Name: Kathy Moody

Organisation (if applicable): The Hamilton Roller Skating Club

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Other Comments:

I have concerns with the dominance that has emerged with the Grassroots Trust. 15 years ago there were 13 Gaming Trusts operating in Hamilton, which gave a much more balanced spread of money. We now have 6 Trusts. Grassroots with 8 sites Lion Foundation 5 sites Trillian 4 sites NZCT 2 sites Southern Trust 1 site Sovereign Trust 1 site. Whilst most of these Trusts are broad based in their funding of the Community the Grassroots Trusts predominately supports the Waikato Rugby Union, Rugby Clubs and School Rugby, in most funding rounds approximately two thirds of applicants for funds from this Trust miss out on funding. I personally have applied for funding from this Trust and been turned down every time due to insufficient funds. Is there insufficient funds or is it being distributed in a biased way. I have been supported by all the other funders, over the years. My concern with Grassroots is their narrow focus supporting a select Group of applicants year after year with large sums of money at the expense of other groups who do not expect year after year support. I have concerns about the close relationship between Hotel ownership and local Rugby interests. It is my opinion there is a lot of self interest within this Trust. This is money from the Public and with this being the largest Trust I feel there should be a much more even handed approach with distribution. Maybe there should be restrictions on this Trust along the lines of the TAB Trust limiting sites so they cannot become more dominant than they are. I feel as their dominance grows and the other Trusts have less involvement in Hamilton there is an awful lot of worthy groups not getting or going get a look in and this situation could become a lot worse if this dominance grows anymore.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Jarrod TRUE

Organisation (if applicable): Harkness Henry

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

See attached submission

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

The New Zealand Racing Board's Feedback on Hamilton City Council's Class 4 Gambling Venue Policy



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The New Zealand Racing Board's Feedback on Hamilton City Council's Class 4 Gambling Venue Policy

Background

1. The New Zealand Racing Board is a statutory body operating under the Racing Act 2003. The New Zealand Racing Board is the authority responsible for administering racing, racing betting and the racing judicial system in New Zealand and is the only entity which can legally conduct racing betting in New Zealand.
2. The New Zealand Racing Board holds a class 4 operator's licence. This licence enables it to operate gaming machines at its TAB Board Venues. Approximately 30 of the 80 TAB Board Venues in New Zealand have gaming machines on-site.

Executive Summary

3. The New Zealand Racing Board invites council to:
 - Replace the current sinking lid with a cap at current numbers (30 venues and 457 machines);
 - Retain the current relocation provisions; and
 - Retain the current discretionary hearing process.

Gaming Machines - Key Facts

4. Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, over 26 years ago.
5. Gambling is a popular form of entertainment that most New Zealanders partake in. The Health and Lifestyles Survey 2012¹ found that 70.3% of New Zealanders aged 15 and over had participated in some form of gambling in the previous 12 months.

¹ http://www.hpa.org.nz/sites/default/files/NZers_participation_in_gambling.pdf

6. The number of gaming machines in New Zealand has been in steady decline since 2003. In 2003, New Zealand had 25,221 gaming machines. In June 2015, New Zealand had 16,579 gaming machines. Hamilton City has also experienced a natural decline in machine numbers. In 2004, Hamilton City had 48 class 4 venues and 650 machines. Hamilton City currently has 30 venues and 457 machines.
7. New Zealand has a very low problem gambling rate by international standards. The 2012 New Zealand Health Survey² found the problem gambling rate was 0.3% of people aged 15 years and over (Problem Gambling Severity Index screen). A second 2012 National Gambling Survey³ undertaken slightly later found that the problem gambling rate was 0.7% of people aged 18 years and over (Problem Gambling Severity Index screen). Both problem gambling rates related to all forms of gambling, not just gaming machine gambling.
8. All gaming machine societies contribute to a problem gambling fund. This fund provides approximately \$18,500,000.00 per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring fenced and not able to be redirected to other health areas.
9. An excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year. Free, confidential help is available in 40 different languages. Free face to face counselling is also available and specialist counselling is available for Maori, Pacifica and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

Existing Gaming Machine Safeguards

10. Significant measures are already in place to minimise the harm from gaming machines.
11. Limits exist on the type of venues that can host gaming machines. The primary activity of all gaming venues must be focused on persons over 18 years of age. For example, it is prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas.

² <http://www.health.govt.nz/system/files/documents/publications/problem-gambling-preliminary-findings.pdf>
³ http://www.health.govt.nz/system/files/documents/pages/national_gambling_study_report_2.pdf

12. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
13. There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is \$2.50. The maximum prize for a non-jackpot machine is \$500.00. The maximum prize for a jackpot linked machine is \$1,000.00.
14. All gaming machines in New Zealand have a feature that interrupts play and displays a pop up message. The pop up message informs the player of the duration of the player's session, the amount spent and the amount won or lost. The message is then displayed asking the player whether they wish to continue with their session or collect their credits.
15. Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
16. ATMs are excluded from all gaming rooms.
17. All gaming venues have a harm minimisation policy.
18. All gaming venues have pamphlets which provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
19. All gaming venues have signage which encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.
20. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
21. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
22. It is not permissible for a player to play two gaming machines at once.

23. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
24. The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).
25. It is not permissible to use the word “jackpot” or any similar word in advertising that is visible from outside a venue.

A Cap at Current Numbers Now Reasonable

26. In light of harm minimisation measures that are now in place, it is submitted that it is reasonable to set a cap at current numbers (30 venues and 457 machines).
27. There is no direct correlation between gaming machine numbers and problem gambling rates. The table below details the problem gambling surveys that have been undertaken.

Survey Year	Survey Name	Screen	Problem Gambling Rate	Survey Size
1991	1991 National Prevalence Survey	SOGS-R	1.2% people were current pathological gamblers (SOGS-R score of 5)	3,933
1999	1999 National Prevalence Survey ⁴	SOGS-R	0.5% of people aged over 18 years had a SOGS-R score of 5	6,452
2006/2007	2006/07 New Zealand Health Survey ⁵	PGSI	0.4% of people aged 15 years and over	12,488
2010	2010 Health and Lifestyles Survey ⁶	PGSI	0.70% of people aged 15 years and over	1,740

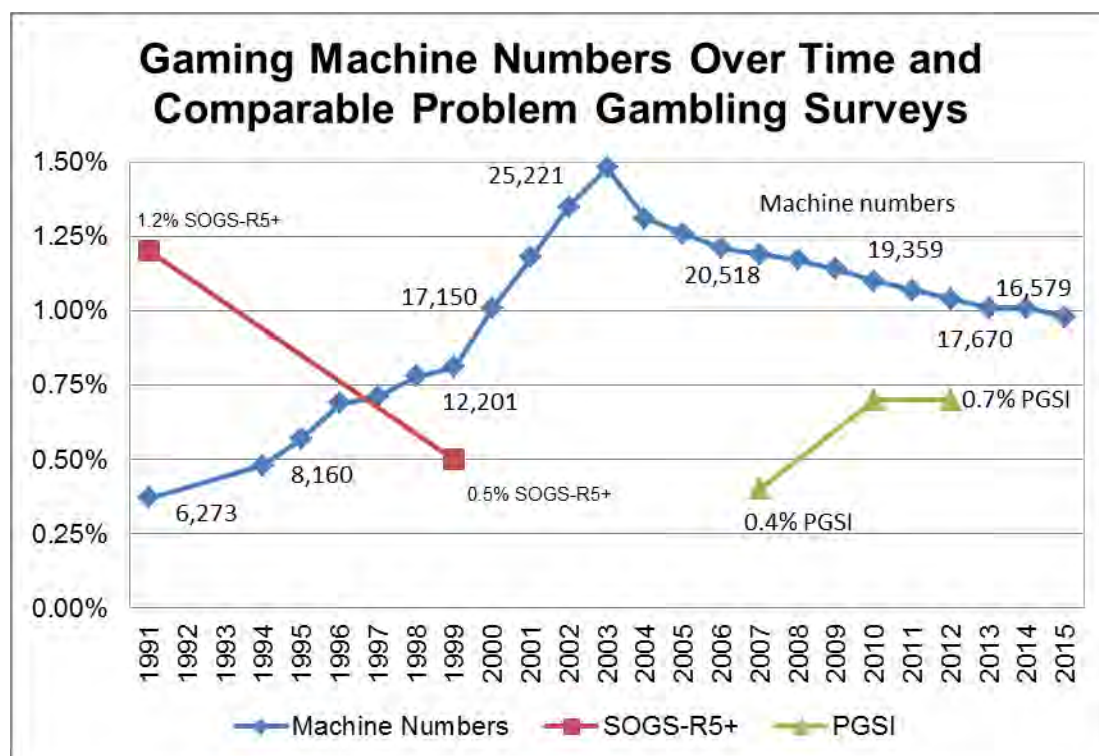
⁴ [http://www.dia.govt.nz/pubforms.nsf/URL/TakingthePulse.pdf/\\$file/TakingthePulse.pdf](http://www.dia.govt.nz/pubforms.nsf/URL/TakingthePulse.pdf/$file/TakingthePulse.pdf)

⁵ <http://www.health.govt.nz/system/files/documents/publications/portrait-of-health-june08.pdf>

⁶ Gray, R 2011 *New Zealanders' Participation in Gambling: Results from the 2010 Health and Lifestyles Survey* – Health Sponsorship Council http://www.hsc.org.nz/sites/default/files/publications/Gambling_Participation_final-web.pdf (page 14)

2011/2012	2011/12 New Zealand Health Survey ⁷	PGSI	0.30% of people aged 15 years and over	9,821
2012 (March to October)	2012 National Gambling Survey ⁸	PGSI	0.70% of people aged 18 years and over	6,251

28. The graph below details the machine numbers over time and the problem gambling rate. Between 1991 and 1999 the problem gambling rate declined considerably despite gaming machine numbers doubling and gaming machine expenditure trebling. Between 2006 and 2010 the problem rate increased, despite the number of gaming machines in New Zealand falling considerably in the same period. Between 2010 and 2012 the problem gambling rate stayed the same, despite a continual decline in gaming machine numbers. When viewed as a whole, the above survey results confirm that there is no direct correlation between gaming machine numbers and problem gambling rates. The reasons for an increase or decrease in problem gambling is complex and multi-faceted, not simply the direct by-product of an increase or decrease in machine numbers.



⁷ <http://www.health.govt.nz/system/files/documents/publications/problem-gambling-preliminary-findings.pdf>
⁸ http://www.health.govt.nz/system/files/documents/pages/national_gambling_study_report_2.pdf

29. The 2012 National Gambling Survey⁹ concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report stated on pages 17 and 18:

Problem gambling and related harms probably reduced significantly during the 1990s but have since remained at about the same level despite reductions in non-casino EGM numbers and the expansion of regulatory, public health and treatment measures. Given that gambling availability expanded markedly since 1987 and official expenditure continued to increase until 2004, these findings are consistent with the adaptation hypothesis. This hypothesis proposes that while gambling problems increase when high risk forms of gambling are first introduced and made widely available, over time individual and environmental adaptations occur that lead to problem reduction.

30. Professor Max Abbott is New Zealand's leading expert on problem gambling. In 2006, Professor Abbott published a paper *Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?* The paper noted that gaming machine reductions and the introduction of caps generally appear to have little impact on problem gambling rates. Professor Max Abbott noted:

EGM reductions and the introduction of caps generally appears to have little impact (page 1).

Over time, years rather than decades, adaptation ('host' immunity and protective environmental changes) typically occurs and problem levels reduce, even in the face of increasing exposure. (page 6).

Contrary to expectation, as indicated previously, although EGM numbers and expenditure increased substantially in New Zealand from 1991 to 1999, the percentage of adults who gambled weekly dropped from 48% to 40%. This is of particular interest because it suggests that greater availability and expenditure do not necessarily increase high-risk exposure. (page 14).

31. The sinking lid policy is unlikely to reduce problem gambling but will reduce the amount of funding available to Hamilton City community groups. Problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines or worse may move to another form of gambling such as offshore based internet and mobile phone gambling.

⁹ http://www.health.govt.nz/system/files/documents/pages/national_gambling_study_report_2.pdf

Temptation to Simply Reduce Gambling Activity

32. There may be a temptation to retain the sinking lid policy to simply reduce the gambling spend as a whole. It must however be remembered that gambling is a lawful entertainment activity and that individuals in New Zealand remain free to make their own decisions as to how they spend their money on the lawful entertainment options that are available.
33. The Gambling Commission has been very critical of steps that have been taken in the past that have been aimed at reducing gambling spend as a whole. In the Gambling Commission decision GC16/06, the Commission stated:

...measures should only be imposed if they reduce the harm caused by problem gambling, as distinct from simply reducing gambling activity which is a lawful and permitted activity under the Act.

Gaming Machine Funding

34. The Gambling Act 2003 seeks to balance the potential harm from gambling against the benefits of using gaming machines as a mechanism for community fundraising. In the 2013 year, money returned to authorised purposes through grants totalled approximately \$246 million.¹⁰ This funding is crucial for a very large number of community groups.
35. By email dated 7 October 2013, the Department of Internal Affairs confirmed that in 2012, Hamilton City received more than 40% of the possible available net proceeds from the gaming machines located within the district, back by way of grants or other authorised purpose payments. The annual total authorised purpose funding (including the non-published club authorised purpose payments) is therefore approximately \$8.88 million.

¹⁰ [http://www.dia.govt.nz/pubforms.nsf/URL/Pokie-system-101-FAQs-February-2015-V2.docx/\\$file/Pokie-system-101-FAQs-February-2015-V2.docx](http://www.dia.govt.nz/pubforms.nsf/URL/Pokie-system-101-FAQs-February-2015-V2.docx/$file/Pokie-system-101-FAQs-February-2015-V2.docx)

36. Recently, the Auckland Council commissioned a community funding survey. The survey data is summarised in the report *Community Funding: A Focus on Gaming Grants* dated 4 September 2012.¹¹ This report also confirmed how essential gaming machine funding is and how extremely difficult it would be for such funding to be obtained from alternative sources. The key findings of this survey were:

- Most respondents (75%) indicated that their organisation is moderately or totally reliant on gaming machine funding to fund core business activities.
- Most respondents (81%) believed that there would be a moderate to high risk to their organisation and their core business if they did not receive gaming funding.

37. The report concluded:

Gaming Trust funding is a major source of community funding for organisations in the Auckland Region. Most respondents believe that the funding for their organisations is not particularly secure and are highly dependent on gaming funding, not just for discretionary or extra activities, but to fund their core business. There is a dependence on this funding with over half the respondents believing that their organisations would be at extreme risk if they did not receive it. Most felt that if the funding was not available, they would struggle to find an alternative source of funding. Some would cut down the activities they undertook, others say they would be forced to close down.

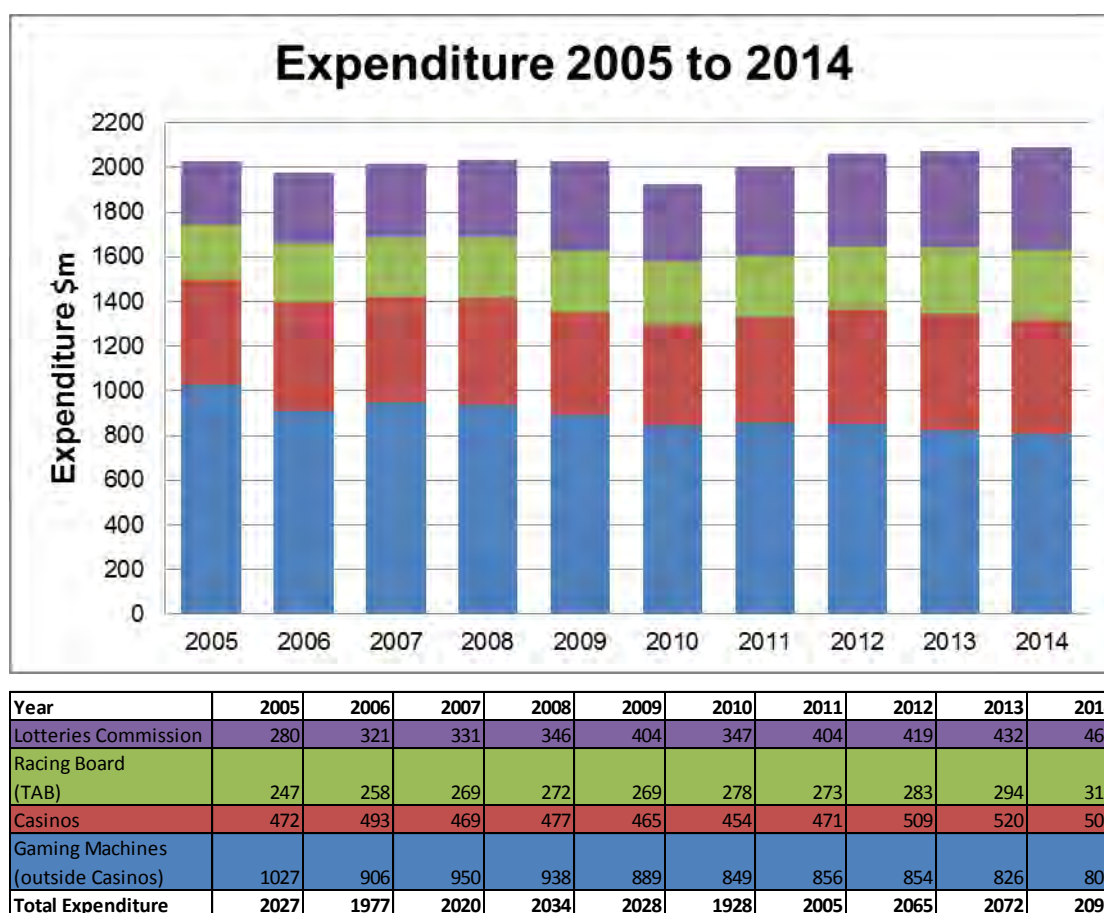
Unintended Consequences – Increase in Internet and Mobile Phone Gambling

38. Any reduction in the local gaming machine offering may have unintended consequences as this may simply lead to a migration of the gambling spend to offshore internet and mobile based offerings. While it is illegal to advertise overseas gambling in New Zealand, it is not illegal to participate in gambling on an overseas based website or mobile phone application.

39. The internet is progressively becoming a normal feature of commercial and social exchange. In 2013, 51% of music sales in New Zealand were via an online download or online music streaming service. We all know of someone who has an addictive like passion for the mobile and tablet game, Candy Crush. Candy Crush has been downloaded more than 500 million times worldwide. Candy Crush's addictiveness is evident by its revenue of \$US10 million a week.

¹¹ www.gamblinglaw.co.nz/download/Research/Auckland_City_Community_Funding_Report.pdf

40. The graph below shows the total gambling expenditure for New Zealand from 2005 to 2014.



41. The above data shows a downward trend for expenditure on non-casino gaming machines and an upward trend on the amount spent on TAB offerings and Lotteries Commission offerings. The total amount gambled from 2005 to date has remained reasonably steady. This data suggests that a reduction in gaming machine numbers reduces non-casino gaming machine expenditure, but not total gambling expenditure, i.e., it may promote a migration to other forms of gambling. Other forms of gambling have a lower return to player and a lower return to the community.
42. Traditionally overseas based online gambling has not been available to people in lower socio-economic areas due to limited access to computers, the internet and limited access to credit cards. However, this has all changed. The internet is progressively becoming a normal feature of commercial and social exchange. A Nextbook Android 4.4 Tablet (with a 7 inch screen and Wi-Fi) can currently be purchased from the Warehouse for a mere \$89.00. Today almost all cell phones include internet access and the ability to download apps. The introduction of Visa

debit cards and Prezzy Cards mean that a bad credit rating is no longer a barrier to being able to spend money online or via mobile apps.

43. It now takes only a simple search and a few minutes to download to your computer, tablet or mobile phone any type of casino game your imagination desires, including an exact replica of the gaming machine programs currently available in New Zealand venues. International Gaming Technology (an international provider of pokie machines with a New Zealand presence) has produced a 58 page brochure¹² detailing their online and mobile offering. The catch phrase is *The Playing Field is Now Everywhere, Online and Mobile Gaming by IGT, It's a whole new game.*
44. In 2011, the Problem Gambling Foundation's Research Director at the time, Dr Philip Townshend, undertook a study on the harm caused by the various modes of Gambling. In Dr Townshend's 2011 paper *Quantifying the Harms of Internet Gambling Relative to Other Gambling Products*¹³, he described offshore based internet gambling as the most harmful mode of gambling and the new *crack cocaine of gambling.*
45. Without the need to cover GST and gaming duties, overseas based gambling providers are able to attract customers from New Zealand with a comprehensive gambling offer. Due to the lower margins and costs the overseas based providers can engage in extensive advertising and provide large rebates to players.
46. Offshore based online gambling however poses considerable risks:
 - Offshore based online gambling is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
 - Offshore based online gambling has no restrictions on bet sizes;
 - Offshore based online gambling has no capacity for venue staff to observe and assist people in trouble;
 - Offshore based online gambling reaches new groups of people who may be vulnerable to the medium;

¹²

http://media.igt.com/marketing/PromotionalLiterature/IGT_Online_Mobile_Games_Portfolio.pdf

¹³

www.gamblinglaw.co.nz/research/Relative_Gambling_Harms_Townshend_2011.pdf

- Offshore based online gambling provides no guaranteed return to player;
 - Offshore based online gambling is more easily abused by minors;
 - Offshore based online gambling has reduced protection to prevent fraud, money laundering or unfair gambling practices. The most notable recent example being 'Full Tilt Poker' which is alleged by the US Attorney's Office to have diverted \$USD444m from customer accounts to its directors and shareholders, despite being regulated by the Alderney Gambling Control Commission (Guernsey); and
 - As an unregulated form of gambling, on-line gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend that they induce to also open an account and deposit funds.
47. If a reduction in gaming machines only redirects gamblers to offshore based internet gambling there is no harm minimisation advantage in that strategy. In addition, there are further disadvantages in the fact that no community funding is generated for New Zealanders, no tax revenue is generated for the New Zealand Government and no contributions are made via the New Zealand problem gambling levy.

Retaining the Existing Relocation Provisions

48. The existing relocation provisions are working well. There is no reason to justify a change.
49. The current provisions enable a venue to relocate when its lease comes to an end or when the venue has been required to relocate due to public works acquisition. The proposed policy removes this flexibility. When it is clear that the same business exists but has simply relocated a short distance, it is fair and reasonable for the policy to permit the venue to continue its current gaming machine operation.

50. When a venue has obtained a licence to host gaming machines its value is artificially increased. This often leads to landlords demanding higher than normal rentals. Allowing flexible relocation prevents landlords demanding unreasonable rentals as it gives the venue operator the ability to relocate to a nearby location.
51. Allowing flexible relocation enables gaming venues to move to new, modern, refurbished premises. New, modern, refurbished premises tend to attract a clientele that are less susceptible to problem gambling.
52. Under the existing relocation provisions the Te Rapa Tavern was permitted to relocate. Under the proposed policy, such a relocation would not be permitted. Allowing businesses to redevelop encourages economic growth and results in improved entertainment facilities being available. The photos below show the old rundown premises and the new modern premises. The redevelopment cost \$3,000,000.00.



The old Te Rapa Tavern



The new Te Rapa Tavern

Retaining the Current Discretionary Hearing Process

53. It is submitted that there is no reason to justify changing the existing discretionary hearing process. The existing discretionary hearing process enables council to consider applications on their merits and for common sense decisions to be made. A venue may wish to relocate from a suburban area to a gambling permitted area, but may find that the proposed site is within 100 metres of residentially zoned land. Although land is zoned residential, it is common for the land to be used for purposes other than residential accommodation. For example, the five crossroads McDonald's and Brooklyn Motor Lodge are located on residentially zoned land. The Classic Builders show home in Te Rapa is also located on residentially zoned land. There

will be situations in the future where a venue is in breach of the location restrictions but it is clear that there is no concern with the proposed location. The current discretionary hearing process enables common sense to prevail in such situations.

Conclusion

54. It is acknowledged that the council needs to strike a balance between the costs and benefits of gaming machine gambling. It is accepted that a small percentage of people (0.7% of people aged 18 years and over) have a problem with their gambling (all forms of gambling). However, for the vast majority of people, casual expenditure on gaming machines is a form of entertainment that they participate in and enjoy, without any harm being caused. Gaming machines also provide a considerable amount of community funding to local community groups. This funding (\$8.88 million per annum) is the lifeblood of many organisations within Hamilton City.
55. Gaming machine numbers are in natural decline, gaming machine revenue is naturally trending down and gaming machine participation is reducing. However, the harm minimisation measures that are now in place have never been higher. In light of the new regulations which are now in place and the natural decline in machine numbers, it is submitted that a cap at current numbers (30 venues and 457 gaming machines) is appropriate. The sinking lid will not reduce problem gambling, but will reduce local community funding opportunities and may encourage people to seek out other forms of gambling, including offshore based internet and mobile phone based gambling. This form of gambling is very harmful and provides no return to the local community and no contribution to employment, taxation and health services in New Zealand.
56. The New Zealand Racing Board suggests that the current relocation provisions be retained. The current flexible relocation provisions enable venues to relocate in the event of public works acquisition, in the event that a landlord charges excessive rentals and in the event that the venue operator wishes to redevelop their business at a nearby site. Enabling redevelopment encourages economic activity and improves

the entertainment facilities available. The recent relocation of the Te Rapa Tavern is an example of a positive relocation which would not be permitted under the proposed amendments.



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25 September 2015

The New Zealand Racing Board's Feedback on Hamilton City Council's TAB Board Venue Policy



Contact Person:

Jarrold True

Phone: 0800 426 254

Mobile: 0274 527 763

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The New Zealand Racing Board's Feedback on Hamilton City Council's TAB Board Venue Policy

Executive Summary

1. The New Zealand Racing Board invites council to retain the cap of one TAB Board Venue per 30,000 people (a cap of four TAB Board Venues). The New Zealand Racing Board opposes the proposed prohibition on any new TAB Board Venue being established.

Concern Re Gaming Funds Going to Racing Purposes – 5 Crossroads Sports Bar & Café Application

2. The sudden proposal to prohibit TAB Board Venues appears to be a result of the recent application to establish a TAB Board Venue at 5 Crossroads Sports Bar & Café. It was clear at the hearing of this application, that the concern did not relate to the New Zealand Racing Board leasing and operating the TAB at 5 Crossroads, but rather the gaming funds from the venue being transferred to the New Zealand Racing Board and being used for racing purposes.
3. Council no longer needs to be concerned with the risk of the New Zealand Racing Board purchasing gaming venues and operating them as TAB Board Venues. Section 33 of the Gambling Act 2003 is currently being amended to prohibit the New Zealand Racing Board from obtaining a gaming licence at a venue, if the venue has gaming machines operated by another society or had gaming machines operated by another society within the last five years. Enclosed is a copy of Supplementary Order Paper No 98 which introduced the change. The change is expected to come into law in the next few weeks.

Racing in New Zealand and the Waikato

4. The New Zealand Racing Board via its TAB operation, funds and promotes racing in New Zealand. There is a very significant community interest in the racing industry in New Zealand. The racing industry provides considerable benefit to the New Zealand economy and New Zealand community:
 - Racing contributes more than \$1.6 billion to the New Zealand economy;

- The industry generates the equivalent of 16,930 full time jobs;
 - The industry involves over 52,000 people who participate in the racing industry via employment or as a club member, volunteer or owner. This amounts to one in every 83 New Zealanders;
 - The industry holds more than 1,000 race meetings a year, attended by more than 1 million people;
 - The industry produces export sales of \$167 million;
 - The industry pays more than \$39 million to the Government each year from wagering taxes alone; and
 - Over 400 community groups and charities benefit from the sharing of racing club facilities and resources.
5. In economic terms, the New Zealand racing industry (\$1.6 billion) is comparable in size to the wine industry (\$1.5 billion) and the seafood industry (\$1.7 billion).
6. The racing industry is strong in the Waikato region. The racing industry in the Waikato region is responsible for the generation of more than \$370.47 million in value added contribution to GDP. In the Waikato region there are:
- More than 7,924 full time, part time, casual and volunteer racing industry participants. This equates to more than 3,894 full time equivalent jobs, generating more than \$172.91 million in wages and salaries for those employees;
 - 15 racing clubs;
 - 11 racing tracks;
 - Over 2,237 racing club members;
 - Over 93 race meetings held annually;

- Over 111,119 people who attend local race meetings each year;
 - Over 1,353 breeders (who spent \$143.78 million in the 2008/2009 financial year);
 - Over 442 trainers (who spent \$154.23 million in the 2008/2009 financial year);
 - Over 5,170 racing animals in training; and
 - Over 4,570 local owners (who received in the 2008/2009 financial year \$9.5 million in prize money).
7. The above findings are set out in full in an October 2010 report, *Size and Scope of the New Zealand Racing Industry*.¹

Proposed Prohibition on the Establishment of a TAB Board Venue Opposed

8. Council's TAB policy only applies to standalone TAB Board Venues. The policy does not apply to Pub TABs, venues with TAB self-service terminals and remote forms of TAB betting. Any restriction or prohibition on the establishment of a TAB Board Venue simply results in an increase in the number of TAB agencies which are incorporated in bars, clubs and hotels. Any restriction or prohibition on a TAB Board Venue also simply leads to an increase in betting via the phone or internet, with the TAB or with overseas betting providers (e.g. www.centrebet.com.au). Overseas betting providers do not contribute to New Zealand via taxes. Overseas betting providers do not contribute to the New Zealand problem gambling levy. Further, the harm minimisation procedures of offshore based betting providers are unknown.
9. A TAB Board Venue provides an environment with staff who are well trained to identify potential problem gamblers and to intervene and provide assistance. Such intervention and assistance is not as readily available when race and sports betting is conducted via a TAB agency which is incorporated in a bar, club or hotel, or when betting is done remotely via the phone or internet.

¹ http://static.tab.co.nz/control/data/nzrb-other-reports/NZRB_Size_and_Scope_Final.pdf.

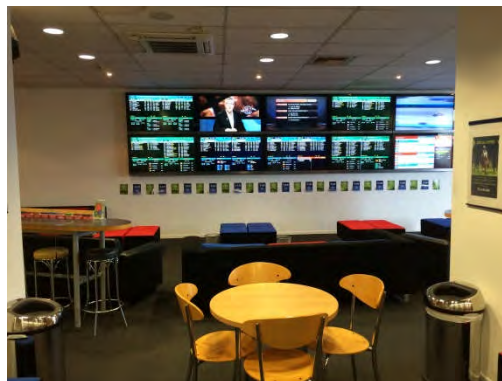
Understanding the Different Types of TAB Venues

10. There are two TAB Board Venues, seven Pub TABs and eleven venues with a TAB self-service terminal in Hamilton City:

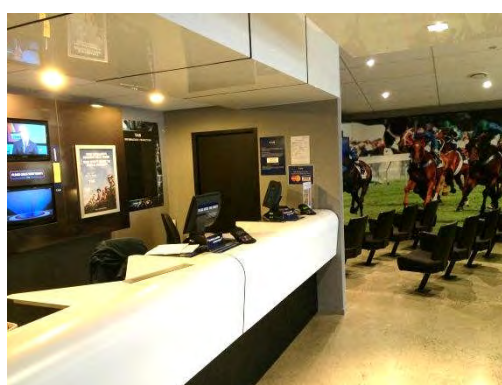
Name	Address	Type of Outlet
Frankton TAB	20 King Street, Hamilton	TAB Board Venue
Te Rapa TAB	618 Te Rapa Road, Hamilton	TAB Board Venue
Chartwell Liquor	13 Lynden Court, Hamilton	Pub TAB
5 Crossroads Sports Bar	236 Peachgrove Road, Hamilton	Pub TAB
Dinsdale Tavern	124 Whatawhata Road, Hamilton	Pub TAB
Hamilton Cosy Club	Claudlands Road, Hamilton	Pub TAB
Eastside Tavern	Cnr Cook & Grey Streets, Hamilton	Pub TAB
Yardhouse Grandview	Cnr Grandview Road & Hyde Avenue, Hamilton	Pub TAB
Te Rapa Tavern	45 Sunshine Avenue, Hamilton	Pub TAB
Aleways Inn	Cnr Commerce & High Streets, Hamilton	Self-service terminal
Flagstaff Cafe and Sports Bar	Flagstaff Shopping Centre, River Road North, Hamilton	Self-service terminal
Glenview Club	211 Peacockes Road, Hamilton	Self-service terminal
Hamilton Combined Returned Services Club	50 Rostrevor Street, Hamilton	Self-service terminal
SkyCity Hamilton Zone Bar and Vue Bar	346 Victoria Street, Hamilton	Self-service terminal
Smokey's Pool and Gaming Lounge	38A Hood Street, Hamilton	Self-service terminal
Waikato Commerce Club	197 Collingwood Street, Hamilton	Self-service terminal
The Hillcrest Tavern	Cnr Clyde & York Streets, Hamilton	Self-service terminal
The Riv Bars and Café	Clyde Street Shopping Centre, Hamilton	Self-service terminal
Cock & Bull Te Rapa	Cnr Maui Street & Church Road, Hamilton	Self-service terminal
The Local (Hamilton)	36 Bryant Road, Hamilton	Self-service terminal

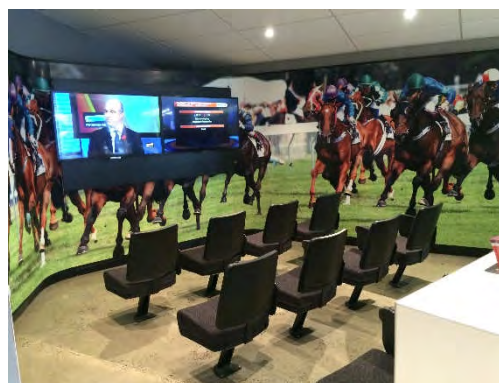
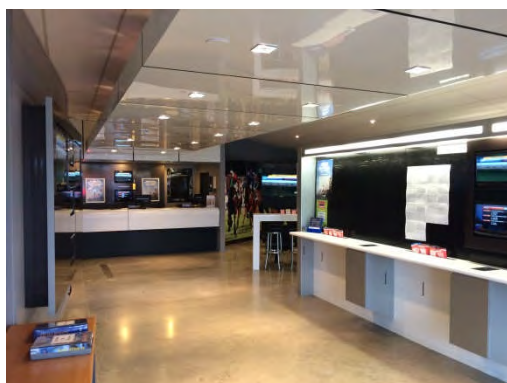
TAB Board Venues

11. The photos below are of established TAB Board Venues (council has jurisdiction over these types of venues):



TAB Board Venue at 20 King Street, Frankton

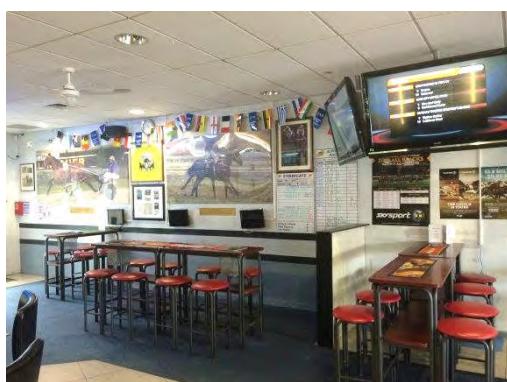




TAB Board Venue at 618 Te Rapa Road, Te Rapa.

Pub TABs

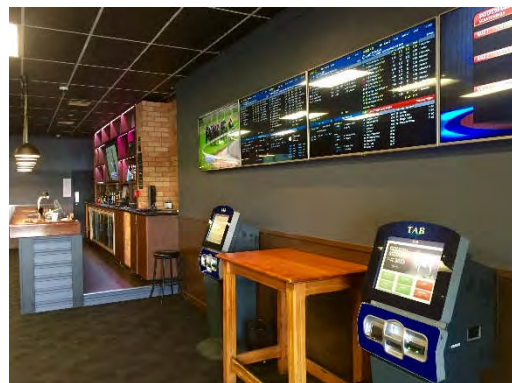
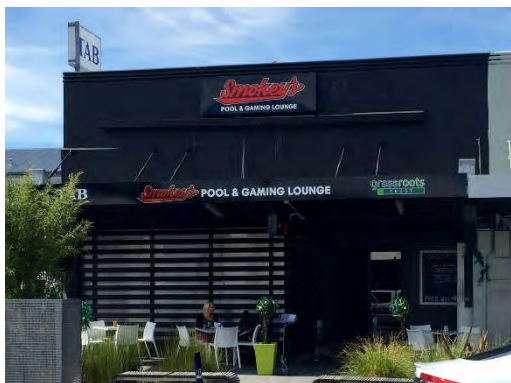
12. The photos below are of a Pub TAB (council has no jurisdiction over these types of venues):



5 Crossroads Sports Bar, 236 Peachgrove Road, Hamilton

Venues with Self-service TAB Terminals

13. The photos below are of a TAB self-service terminal venue (council has no jurisdiction over these types of venues):



Smokey's Pool & Gaming Lounge, Hood St, Hamilton

TAB Board Venues and Harm Minimisation

14. The New Zealand Racing Board takes its statutory responsibilities under the Racing Act 2003 to minimise problem gambling very seriously. The New Zealand Racing Board conducts its business activities with integrity and is committed to providing a safe and enjoyable environment for customers to wager responsibly.
15. The New Zealand Racing Board participates in the Problem Gambling Expert Advisory Group established by the Ministry of Health and the Department of Internal Affairs, to ensure that it has a high understanding of the issues associated with problem gambling, and the effective management of problem gambling.
16. All TAB Board Venues are connected via closed circuit television to a central monitoring office.
17. All TAB Board Venues have signage displayed which encourages players to gamble only at levels they can afford and provides advice on how to seek assistance for problem gambling.
18. TAB Board Venues are subject to regular internal audits and spot checks to ensure adherence to the legislative and regulatory requirements along with the New Zealand Racing Board's own problem gambling policy requirements.
19. No automatic teller machines are located at any TAB Board Venue.

20. The New Zealand Racing Board provides problem gambling awareness training to each employee and agent who is involved in supervising gambling. The New Zealand Racing Board is one of the few organisations which have contracted the Problem Gambling Foundation to undertake all its on-site training. The use of an independent third party ensures that a comprehensive training package is provided based on the latest research from around the world. The trainers are experts in their field, who have considerable experience in dealing with problem gamblers on a one on one basis.

The New TAB Board Venues are Clean, Well-lit and Open

21. The TAB Board Venues in New Zealand are being remodelled. Gone are the days of poorly lit venues that are designed to shield those inside from the gaze of the general public, and are attractive to people in low socio-economic areas. New TAB Board Venues are designed to ensure that the gambling activity is transparent and attractive to customers in higher socio-economic areas. The photos above of the Te Rapa TAB Board Venue show the clean, well-lit, modern look.

A New TAB Board Venue Will Normally Result in a Reduction of the TAB Offerings in Nearby Pubs and Hotels

22. When a new TAB Board Venue is established, the New Zealand Racing Board would look to remove several TAB terminals in surrounding pubs, hotels and clubs in order to make the financial investment in the TAB Board Venue viable.

Alcohol Free Environment a Positive

23. The majority of TAB Board Venues are alcohol free. An example of an alcohol free TAB Board Venue is the TAB located at 618 Te Rapa Road, Te Rapa. All the TAB facilities in Hamilton that are not contained within a formal TAB Board Venue, are located in venues where there is alcohol available (pubs, clubs, hotels etc.). It is counterproductive on harm minimisation grounds to require all race and sports betting to be available where alcohol is sold. It is well documented that alcohol is a factor which is known to contribute to problem gambling.
24. The Baron and Dickerson study² found that two or more alcoholic drinks increased reports of difficulty in resisting urges to gamble. The study also found that continued

² Baron, E., and Dickerson, M.G. (1999). Alcohol consumption and self-control of gambling behaviour, Journal of Gambling Studies, 15(1), 3-15 (www.gamblinglaw.co.nz/download/Misc/Baron_Dickerson.pdf).

alcohol consumption during a gambling session resulted in unplanned, extended gambling. The report stated:

Results indicated a consistent theme of alcohol use contributing significantly to impaired control of gambling behaviour...

...

A gambler's choice to resist urges to either start or stop gambling and to limit expenditure may be seriously affected under the influence of alcohol.

...

These exploratory findings present a picture of a regular gambler drinking alcohol prior to a session of gambling and having increasing problems with control in resisting urges to begin a session of gambling (one in eight players (13.3%) found it 'difficult to resist playing the card machines after having a few drinks'). Continued drinking of alcohol appears to be moderately associated with progressive levels of impaired control within a session of gambling, and appears to further add to the problems of ending a session of play for the gambler.

25. In the commentary of the special edition of the Journal of Gambling Studies,³ Peter Nathan commentated on the link between alcohol consumption and gambling and noted that it was no wonder that so many casinos provide free drinks to their patrons. The commentary stated:

Moderate intoxication, especially of pathological gamblers, apparently increases time spent gambling, rate of "power bets," and proportion of losing hands played. All three reflect impaired judgement that presumably leads to greater gambling losses. No wonder so many casinos provide free drinks to their patrons.

26. The link between alcohol use, smoking and problem gambling was noted by the Ministry of Health in the 2009 document *A Focus on Problem Gambling: Results of the 2006/07 New Zealand Health Survey*⁴ as follows:

Problem gambling was significantly associated with current smoking and hazardous alcohol consumption. Compared to people with no gambling problems, problem gamblers had:

- 3.73 times the odds of being a current smoker
- 5.20 times the odds of having hazardous drinking behaviour

after accounting for possible confounding factors.

27. In addition to the direct link between problem gambling and alcohol use, the serving of alcohol and food in bars is a distraction for venue staff and reduces the level of

³ Nathan, P. (2005) Commentary, Special Issue, Journal of Gambling Studies, 21(3), 355-361 (www.gamblinglaw.co.nz/download/Misc/Nathan.pdf).

⁴ <http://www.health.govt.nz/system/files/documents/publications/a-focus-on-problem-gambling-results-200607-nz-health-survey.pdf>

supervision and problem gambling monitoring. On busy Friday and Saturday nights, bar staff often spend their entire time addressing the queues at the bar, rather than paying close attention to the patrons at the venue who are gambling. In the standalone TAB Board Venue environment, the staff are solely dedicated to monitoring gambling and are never distracted from their core host responsibility role. The photos below demonstrate the difference between the two types of venues on a Friday night.



Friday Night at a Sports Bar with gaming



Friday Night at a TAB Board Venue

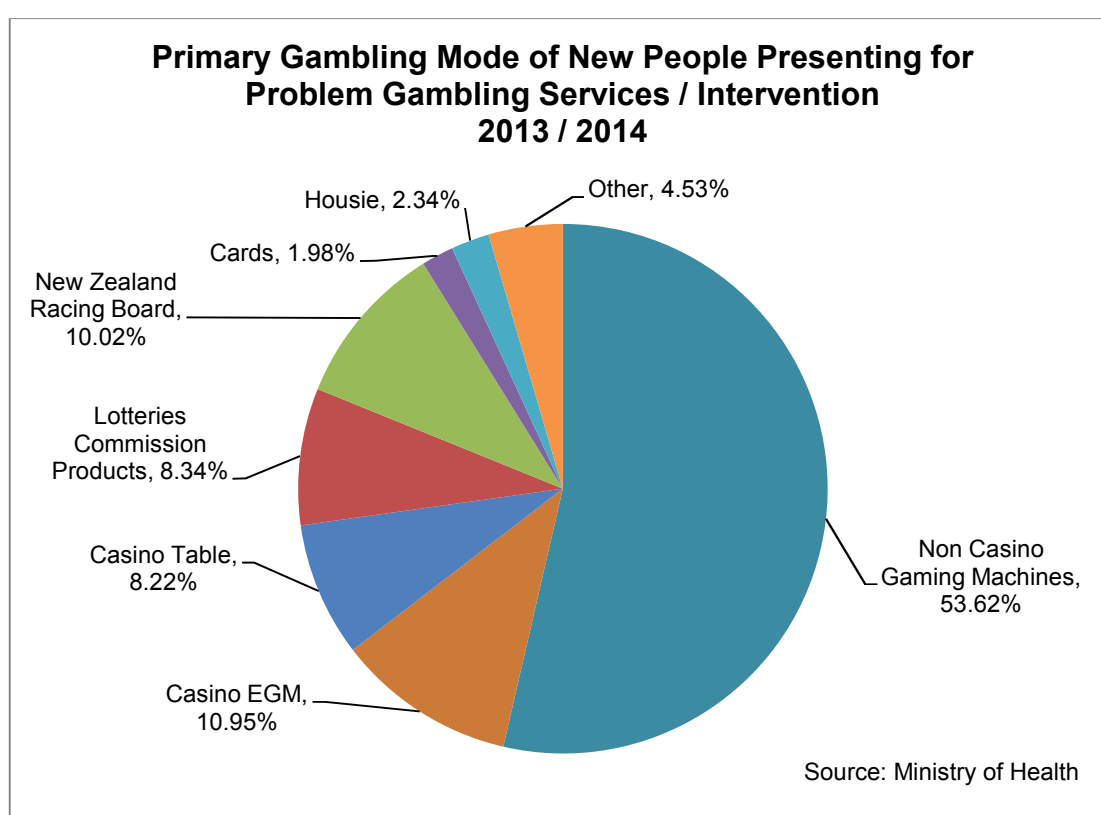
TAB Board Venues Have Modest Trading Hours

28. The TAB offering in bars, clubs and hotels is available until the early hours of the morning. The trading hours of TAB Board Venues are modest. The standard trading hours of TAB Board Venues are:

Monday: 11am - 7pm
 Tuesday: 11am - 7pm
 Wednesday: 11am - 8pm
 Thursday: 11am - 10pm
 Friday: 11am - 10pm
 Saturday: 9am - 8pm
 Sunday: 11am - 7pm

Race and Sports Betting Does Not Need the Same Restrictions as Gaming Machine Gambling

29. TAB Board Venues are different from gaming machine venues. Race and sports betting is different from the rapid and repetitive gambling undertaken on a gaming machine. Race and sports betting does not have a high prevalence of problem gambling. Only approximately 7.52%⁵ of all new problem gamblers indicate a problem with race betting. Only 2.5%⁶ of all new problem gamblers report a problem with sports betting. In contrast to this, approximately 64.57%⁷ of new problem gamblers report a problem with gaming machines (both casino gaming machines and non-casino gaming machines).



Source: Ministry of Health Website http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted.

⁵ Source: Ministry of Health Website http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted.

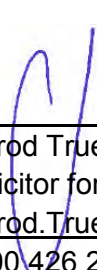
⁶ Source: Ministry of Health Website http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted.

⁷ Source: Ministry of Health Website http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted.

30. Several councils have a sinking lid in respect of their gaming machine policy but no restriction on TAB Board Venues. Examples include:
- Christchurch City Council
 - Gisborne District Council
 - Hastings District Council
 - Tararua District Council
 - Thames-Coromandel District Council
 - Wairoa District Council

Conclusion

31. The proposed prohibition on new TAB Board Venues is counterproductive on harm minimisation grounds. A prohibition simply results in TAB facilities being established in bars, clubs and hotels and TAB betting being undertaken by remote methods such as the phone and internet. TAB Board Venues are highly supervised and the most controlled environment in which race and sports betting can take place. A prohibition on new TAB Board Venues will result in the TAB offering being established in an environment where there is alcohol and where the staff's primary focus is the serving of alcohol and food, rather than monitoring and supervising the patrons who are gambling. It is submitted that the cap of four TAB Board Venues should remain.
32. Council should no longer be concerned with the use of gaming funds for racing purposes following the establishment of a TAB Board Venue. The changes to section 33 will prohibit an existing gaming site being converted to a TAB Board Venue and the gaming funds being used for racing purposes.



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0800 426 254
0274 527 763

25 September 2015

No 98

House of Representatives

Supplementary Order Paper

Tuesday, 21 July 2015

Gambling Amendment Bill (No 3)

Proposed amendments

Hon Peter Dunne, in Committee, to move the following amendments:

Clause 6A

Replace *clause 6A* (page 6, lines 15 to 21) with:

6A Section 33 amended (Status of New Zealand Racing Board and racing clubs)

After section 33(2), insert:

- (3) However, a class 4 venue licence may not be issued to the New Zealand Racing Board or a racing club if another corporate society (other than the New Zealand Racing Board or that racing club)—
- (a) holds a class 4 venue licence for the venue; or
 - (b) held a class 4 venue licence for the venue at any time during the 5-year period immediately before the date on which the application for the licence is made.

Clause 18

In *new section 371(1)(dd)*, delete “in connection with class 4 gambling at the venue” (page 15, line 33).

Explanatory note

This Supplementary Order Paper amends the Gambling Amendment Bill (No 3). The amendment to *clause 6A* replaces the proposed *new section 33(3)* to clarify that a class 4 venue licence may not be issued to the New Zealand Racing Board or a racing club if another corporate society holds a class 4 venue licence for the venue or held a class 4 venue licence for the venue at any time during the 5-year period immediately

Proposed amendments to
Gambling Amendment Bill (No 3)

before the date on which the application for the licence is made. The amendment to *clause 18* removes from *new section 371(1)(dd)* the phrase “in connection with class 4 gambling at the venue” to ensure that regulations may also be made to prevent corporate societies from making payments to venue operators for matters that are not connected to class 4 gambling at the venue.

Wellington, New Zealand:

Published under the authority of the House of Representatives—2015

Name: William Mitchell

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Louise Were

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

I oppose the option to allow venues to merge as it seeks to only create a large venue. Venues should not be in areas which have a decile rating of 5 and above

Proximity Restrictions:

I oppose the option to allow venues to merge as it seeks to only create a large venue. Venues should be in industrial zoned areas. They should not be located within 200m of a residential zoned area

Other Comments:

No merges should be allowed. If you have to explore a merge, then one site should cease its licence not merge with another.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

No new venues or relocation of venues. Also no venues should move into the ownership or operate under the NZRB.

Name: LAURA Millward

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No

Name: Jocelyn Brazier

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

The single venue would need to be within a gambling permitted area, or the number of gambling machines must remain the same for the single site (i.e. no increase to absorb the machines from the closing venue).

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Rupert Hodgson

Organisation (if applicable): Hamilton Cricket Association

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No



**Submission to
Hamilton City Council
on the proposed
Class 4 Gambling Policy**

24 September 2015

Hamilton Cricket Association's Position

The Hamilton Cricket Association (HCA) supports the proposal to allow gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B). However, HCA would like to see the relocation provision extended so gambling venues are also able to relocate **within** a Gambling Permitted Area.

There are several reasons for our position.

- As the AUT found in their 2012 study, research shows that the *location* of gambling machines is more important than the *number* of gambling machines operating, with regard to prevention and minimisation of gambling harm.
- The Government, in the 'Gambling (Gambling Harm Reduction) Amendment Act 2013', acknowledged the value of relocation clauses by requiring local councils to consider introducing them.
- Where business owners are otherwise at the mercy of building owners, relocation clauses provide sensible options for business owners. Otherwise, as captive tenants, they can be subject to building owners who may choose to hike rents or allow premises to become run down.
- Relocation clauses provide options for councils in terms of future-proofing their community. They allow councils to respond to urban growth, re-zoning and population changes.

In addition, HCA recommends Hamilton City Council considers replacing its existing sinking lid policy, with a cap on gaming machine numbers based on today's rate (457 machines).

This is because sinking lid policies *do not* reduce problem gambling rates. Despite the 25% reduction in gaming machine numbers during the past ten years, New Zealand's problem gambling rate has remained consistently low (around 0.3% - 0.7% of the population). The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006". Sinking lid policies also entrench gaming operations, and ultimately result in fewer pub gaming grants being available for local sports and community groups.

The ultimate result of fewer grants available for local sports and community groups would have a significant and severe impact on HCA's ability to operate and provide an amateur cricket platform that stretches from Port Waikato to Tauwhare, Huntly to Glenview, and beyond.

HCA provides cricket opportunities for all cricket enthusiasts of all ages. Organised weekly matches are held from primary school new entrants to adults of all ages. We are closely aligned with both schools and clubs within the HCA region, with over 3 500 participants in structured cricket alone, without including awareness programmes (etc.) within schools in the region.

All of this is entirely under the bracket of amateur sport, with grants helping fund seasonal coaches, development officers, and provide resources towards allowing HCA provide a platform that caters to all levels and ages.

The HCA, and the cricketing platforms under the HCA bracket, can only continue to operate effectively if Option B is agreed to, and the relocation provision expanded to include gambling

venues being permitted to relocate within a Gambling Permitted Area, as well as replacing the existing sinking lid policy. Without the grants that come from gambling-backed trusts, HCA would not be able to sustain itself.

Recommendations

Our recommendations are that the council:

- **Allows** gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B) and extends the relocation provision so gambling venues are also able to relocate **within** a Gambling Permitted Area.
- **Replaces** the existing sinking lid policy with a gaming machine cap at current numbers (457 machines).

For further information, or if you have any queries about this submission, please contact:

Rupert Hodgson

General Manager, Hamilton Cricket Association

Ph: (07) 858-2600 or 027 434-0321

Email: rupert@hamiltoncricket.co.nz

Name: Rupert Hodgson

Organisation (if applicable): Hamilton Old Boys Cricket Club Incorporated

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No



**Submission to
Hamilton City Council
on the proposed
Class 4 Gambling Policy**

24 September 2015

Hamilton Old Boys Cricket Club's Position

The Hamilton Old Boys Cricket Club (HOBCC) supports the proposal to allow gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B). However, HOBCC would like to see the relocation provision extended so gambling venues are also able to relocate **within** a Gambling Permitted Area.

There are several reasons for our position.

- As the AUT found in their 2012 study, research shows that the *location* of gambling machines is more important than the *number* of gambling machines operating, with regard to prevention and minimisation of gambling harm.
- The Government, in the 'Gambling (Gambling Harm Reduction) Amendment Act 2013', acknowledged the value of relocation clauses by requiring local councils to consider introducing them.
- Where business owners are otherwise at the mercy of building owners, relocation clauses provide sensible options for business owners. Otherwise, as captive tenants, they can be subject to building owners who may choose to hike rents or allow premises to become run down.
- Relocation clauses provide options for councils in terms of future-proofing their community. They allow councils to respond to urban growth, re-zoning and population changes.

In addition, HOBCC recommends Hamilton City Council considers replacing its existing sinking lid policy, with a cap on gaming machine numbers based on today's rate (457 machines).

This is because sinking lid policies *do not* reduce problem gambling rates. Despite the 25% reduction in gaming machine numbers during the past ten years, New Zealand's problem gambling rate has remained consistently low (around 0.3% - 0.7% of the population). The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006". Sinking lid policies also entrench gaming operations, and ultimately result in fewer pub gaming grants being available for local sports and community groups.

HOBCC is a club under the Hamilton Cricket Association (HCA), and without the funding that both our club and that association receives, neither would be able to operate effectively. HOBCC relies on grants and funding in order to provide opportunities and resources for people to be able to play cricket.

On an association-wide scale, the ultimate result of fewer grants available for local sports and community groups would have a significant and severe impact on HCA's ability to operate and provide an amateur cricket platform that stretches from Port Waikato to Tauwhare, Huntly to Glenview, and beyond.

HCA provides cricket opportunities for all cricket enthusiasts of all ages. Organised weekly matches are held from primary school new entrants to adults of all ages. HCA is closely aligned with both schools and clubs within the HCA region, with over 3 500 participants in structured cricket alone, without including awareness programmes (etc.) within schools in the region.

All of this is entirely under the bracket of amateur sport, with grants helping fund seasonal coaches, development officers, and provide resources towards allowing HCA provide a platform that caters to all levels and ages.

The HCA, HOBCC, and the cricketing platforms under the HCA bracket, can only continue to operate effectively if Option B is agreed to, and the relocation provision expanded to include gambling venues being permitted to relocate within a Gambling Permitted Area, as well as replacing the existing sinking lid policy. Without the grants that come from gambling-backed trusts, both HOBCC and HCA would not be able to sustain themselves.

Recommendations

Our recommendations are that the council:

- **Allows** gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B) and extends the relocation provision so gambling venues are also able to relocate **within** a Gambling Permitted Area.
- **Replaces** the existing sinking lid policy with a gaming machine cap at current numbers (457 machines).

For further information, or if you have any queries about this submission, please contact:

Rupert Hodgson

Secretary & Treasurer, Hamilton Old Boys CC

Ph: 027 434-0321

Email: ruperthodgson1914@gmail.com

Name: Scott Fisher

Organisation (if applicable): Fraser Technical Cricket Club Incorporated

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No



**Submission to
Hamilton City Council
on the proposed
Class 4 Gambling Policy**

24 September 2015

Fraser Tech Cricket Club's Position

The Fraser Tech Cricket Club (FTCC) supports the proposal to allow gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B). However, FTCC would like to see the relocation provision extended so gambling venues are also able to relocate **within** a Gambling Permitted Area.

There are several reasons for our position.

- As the AUT found in their 2012 study, research shows that the *location* of gambling machines is more important than the *number* of gambling machines operating, with regard to prevention and minimisation of gambling harm.
- The Government, in the 'Gambling (Gambling Harm Reduction) Amendment Act 2013', acknowledged the value of relocation clauses by requiring local councils to consider introducing them.
- Where business owners are otherwise at the mercy of building owners, relocation clauses provide sensible options for business owners. Otherwise, as captive tenants, they can be subject to building owners who may choose to hike rents or allow premises to become run down.
- Relocation clauses provide options for councils in terms of future-proofing their community. They allow councils to respond to urban growth, re-zoning and population changes.

In addition, FTCC recommends Hamilton City Council considers replacing its existing sinking lid policy, with a cap on gaming machine numbers based on today's rate (457 machines).

This is because sinking lid policies *do not* reduce problem gambling rates. Despite the 25% reduction in gaming machine numbers during the past ten years, New Zealand's problem gambling rate has remained consistently low (around 0.3% - 0.7% of the population). The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006". Sinking lid policies also entrench gaming operations, and ultimately result in fewer pub gaming grants being available for local sports and community groups.

FTCC is a club under the Hamilton Cricket Association (HCA), and without the funding that both our club and that association receives, neither would be able to operate effectively. FTCC relies on grants and funding in order to provide opportunities and resources for people to be able to play cricket.

On an association-wide scale, the ultimate result of fewer grants available for local sports and community groups would have a significant and severe impact on HCA's ability to operate and provide an amateur cricket platform that stretches from Port Waikato to Tauwhare, Huntly to Glenview, and beyond.

HCA provides cricket opportunities for all cricket enthusiasts of all ages. Organised weekly matches are held from primary school new entrants to adults of all ages. HCA is closely aligned with both schools and clubs within the HCA region, with over 3 500 participants in structured cricket alone, without including awareness programmes (etc.) within schools in the region.

All of this is entirely under the bracket of amateur sport, with grants helping fund seasonal coaches, development officers, and provide resources towards allowing HCA provide a platform that caters to all levels and ages.

The HCA, FTCC, and the cricketing platforms under the HCA bracket, can only continue to operate effectively if Option B is agreed to, and the relocation provision expanded to include gambling venues being permitted to relocate within a Gambling Permitted Area, as well as replacing the existing sinking lid policy. Without the grants that come from gambling-backed trusts, both FTCC and HCA would not be able to sustain themselves.

Recommendations

Our recommendations are that the council:

- **Allows** gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B) and extends the relocation provision so gambling venues are also able to relocate **within** a Gambling Permitted Area.
- **Replaces** the existing sinking lid policy with a gaming machine cap at current numbers (457 machines).

For further information, or if you have any queries about this submission, please contact:

Prakash Gosai

Board Member, Fraser Tech CC

Ph: 021 688-906

Email: prakashg@lodgerentals.co.nz

Name: Nick Field

Organisation (if applicable): Hillcrest tavern and The Eastside tavern

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

Allows gambling venues to relocate from outside gambling permitted area to inside a gambling permitted area (option b) and extends the relocation provision so gambling venues are able to relocate within a gambling permitted area.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

We do not want to put into the unenviable position of the building owner knowing they have captive tenants. We also need to futureproof our business if for any reason we do have to relocate.

Proximity Restrictions:

We also recommend replacing the existing sinking lid policy with a gaming machine cap at current numbers.

Other Comments:

We have been operating The Eastside tavern for over 15 years and The Hillcrest tavern for 4 years, we employ over 20 people (not including contractors) and take our host responsibility and harm minimisation responsibilities very seriously.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No

Name: Margaret Cameron

Organisation (if applicable): Hamilton Workingmen's Club

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Not Answered

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Not Answered

Hamilton Workingmen's Club Feedback on Hamilton City Council's Class 4 Gambling Venue Policy



Background

The Hamilton Workingmen's Club ("the Club") has been operating successfully since its incorporation in 1955 (when it was originally known as the Hamilton and District Working Men's Club Inc). The Club has a very large active membership, comprised of approximately 7,500 members. The Club is one of the largest, Sport Leisure and Recreational clubs in New Zealand. The Club has 18 gaming machines on site and a second venue licence to operate 12 gaming machines at the adjacent bowling pavilion.



Summary

The Club submits that the council should preserve the current relocation provisions and preserve the current discretionary hearing process.

Relocation

The Club does not see any reason to change the current relocation provisions which are working well. Presently, the current relocation provisions mean a venue can relocate when a lease ends or a venue has been subjected to public works acquisition. The proposed policy as drafted is far too rigid.

If the hosting of gaming machines is tied to a particular premises, tenants can often be forced out of a location due to increases in rent. The provision for relocation avoids anti-competitive behaviour where particular premises have an inflated value. The current relocation provisions avoid this anti-competitive behaviour.

The current relocation provisions also enable venues to move to new modern premises. For instance, the Te Rapa Tavern was permitted to relocate under the current relocation provisions. This would be prohibited under the new policy. The redevelopment created employment opportunities as well as cultural revival. This was achieved through a \$3 million dollar upgrade. This stimulated economic development and improved the quality of entertainment amenities. The below photos show the vast improvement that the current premises have over the previous premises.



The old Te Rapa Tavern



The new Te Rapa Tavern

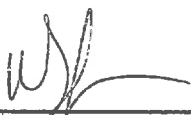
Current Discretionary Hearing Process

The Club does not believe that the current discretionary hearing process should be changed. The current process allows council to consider applications on a pragmatic case-by-case basis. It is almost inevitable that churches, schools, childcare centres and other sensitive sites will be in geographical proximity to proposed venues. Inevitably, there will be a residential site in geographical proximity. While it is acknowledged that some sites generate community opposition, there are ways in which to address these issues rather than prohibition. For instance, signage can be changed and entrances altered so that the premises back on to each other rather than face each other. It means that consideration can be given to the opening hours of the sensitive sites and the number of churchgoers / students considered. A

blanket prohibition does not allow common sense to prevail. A discretion leads to better, thorough and considered decision making.

Conclusion

The current relocation provisions ought to be kept. These provisions enable venues to have the flexibility to relocate where there is a public works acquisition, avoids anti-competitive behaviour, and means the venue operator can redevelop their business at a nearby site. The stimulation of economic activity will in turn lead to an improvement in entertainment venues. The Te Rapa Tavern shows the type of development that should be encouraged, not prohibited.



Brian Simpson
President

30.9.2015

Date

Name: Michele Connell

Organisation (if applicable): Balloons over Waikato

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

Balloons over Waikato supports Option B. It is important to note that this iconic event for the city, simply would NOT happen if it weren't for gaming trust funding. This funding is by far the largest cash contribution to the festival and it would be impossible to replace with sponsorship. the event as we know it would be severely compromised and would not occur in its current form if at all. We strongly advise that Option B is adopted with flexibility as noted below.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

Balloons over Waikato supports the relocation option as this provides sensible options for business owners who may be subject to rent hikes or other valid relocation reasons. We feel this is of benefit as allows gambling venues to move away from highly de

Proximity Restrictions:

We recommend that relocations be allowed 'within' a Gambling Permitted Area as well as 'to' a Gambling Permitted Area. Venues should not be disadvantaged if they choose to move when they are already within the designated area.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Not Answered

Name: Kevin Hamilton

Organisation (if applicable): Marist-Suburbs Cricket Club

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No



**Submission to
Hamilton City Council
on the proposed
Class 4 Gambling Policy**

24 September 2015

Marist Cricket Club's Position

The Marist Cricket Club (MCC) supports the proposal to allow gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B). However, MCC would like to see the relocation provision extended so gambling venues are also able to relocate **within** a Gambling Permitted Area.

There are several reasons for our position.

- As the AUT found in their 2012 study, research shows that the *location* of gambling machines is more important than the *number* of gambling machines operating, with regard to prevention and minimisation of gambling harm.
- The Government, in the 'Gambling (Gambling Harm Reduction) Amendment Act 2013', acknowledged the value of relocation clauses by requiring local councils to consider introducing them.
- Where business owners are otherwise at the mercy of building owners, relocation clauses provide sensible options for business owners. Otherwise, as captive tenants, they can be subject to building owners who may choose to hike rents or allow premises to become run down.
- Relocation clauses provide options for councils in terms of future-proofing their community. They allow councils to respond to urban growth, re-zoning and population changes.

In addition, MCC recommends Hamilton City Council considers replacing its existing sinking lid policy, with a cap on gaming machine numbers based on today's rate (457 machines).

This is because sinking lid policies *do not* reduce problem gambling rates. Despite the 25% reduction in gaming machine numbers during the past ten years, New Zealand's problem gambling rate has remained consistently low (around 0.3% - 0.7% of the population). The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006". Sinking lid policies also entrench gaming operations, and ultimately result in fewer pub gaming grants being available for local sports and community groups.

MCC is a club under the Hamilton Cricket Association (HCA), and without the funding that both our club and that association receives, neither would be able to operate effectively. MCC relies on grants and funding in order to provide opportunities and resources for people to be able to play cricket.

On an association-wide scale, the ultimate result of fewer grants available for local sports and community groups would have a significant and severe impact on HCA's ability to operate and provide an amateur cricket platform that stretches from Port Waikato to Tauwhare, Huntly to Glenview, and beyond.

HCA provides cricket opportunities for all cricket enthusiasts of all ages. Organised weekly matches are held from primary school new entrants to adults of all ages. HCA is closely aligned with both schools and clubs within the HCA region, with over 3 500 participants in structured cricket alone, without including awareness programmes (etc.) within schools in the region.

All of this is entirely under the bracket of amateur sport, with grants helping fund seasonal coaches, development officers, and provide resources towards allowing HCA provide a platform that caters to all levels and ages.

The HCA, MCC, and the cricketing platforms under the HCA bracket, can only continue to operate effectively if Option B is agreed to, and the relocation provision expanded to include gambling venues being permitted to relocate within a Gambling Permitted Area, as well as replacing the existing sinking lid policy. Without the grants that come from gambling-backed trusts, both MCC and HCA would not be able to sustain themselves.

Recommendations

Our recommendations are that the council:

- **Allows** gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B) and extends the relocation provision so gambling venues are also able to relocate **within** a Gambling Permitted Area.
- **Replaces** the existing sinking lid policy with a gaming machine cap at current numbers (457 machines).

For further information, or if you have any queries about this submission, please contact:

[Name]

[Position], Marist CC

Ph: [number]

Email: [address]

Name: Russell Wilson

Organisation (if applicable): Melville Cricket Club Incorporated

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

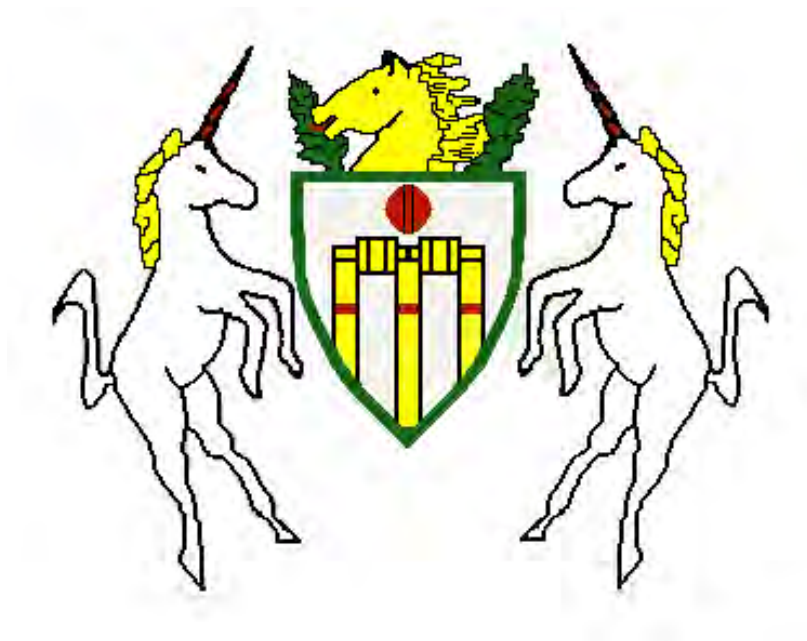
Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No



**Submission to
Hamilton City Council
on the proposed
Class 4 Gambling Policy**

24 September 2015

Melville Cricket Club's Position

The Melville Cricket Club (MCC) supports the proposal to allow gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B). However, MCC would like to see the relocation provision extended so gambling venues are also able to relocate **within** a Gambling Permitted Area.

There are several reasons for our position.

- As the AUT found in their 2012 study, research shows that the *location* of gambling machines is more important than the *number* of gambling machines operating, with regard to prevention and minimisation of gambling harm.
- The Government, in the 'Gambling (Gambling Harm Reduction) Amendment Act 2013', acknowledged the value of relocation clauses by requiring local councils to consider introducing them.
- Where business owners are otherwise at the mercy of building owners, relocation clauses provide sensible options for business owners. Otherwise, as captive tenants, they can be subject to building owners who may choose to hike rents or allow premises to become run down.
- Relocation clauses provide options for councils in terms of future-proofing their community. They allow councils to respond to urban growth, re-zoning and population changes.

In addition, MCC recommends Hamilton City Council considers replacing its existing sinking lid policy, with a cap on gaming machine numbers based on today's rate (457 machines).

This is because sinking lid policies *do not* reduce problem gambling rates. Despite the 25% reduction in gaming machine numbers during the past ten years, New Zealand's problem gambling rate has remained consistently low (around 0.3% - 0.7% of the population). The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006". Sinking lid policies also entrench gaming operations, and ultimately result in fewer pub gaming grants being available for local sports and community groups.

MCC is a club under the Hamilton Cricket Association (HCA), and without the funding that both our club and that association receives, neither would be able to operate effectively. MCC relies on grants and funding in order to provide opportunities and resources for people to be able to play cricket.

On an association-wide scale, the ultimate result of fewer grants available for local sports and community groups would have a significant and severe impact on HCA's ability to operate and provide an amateur cricket platform that stretches from Port Waikato to Tauwhare, Huntly to Glenview, and beyond.

HCA provides cricket opportunities for all cricket enthusiasts of all ages. Organised weekly matches are held from primary school new entrants to adults of all ages. HCA is closely aligned with both schools and clubs within the HCA region, with over 3 500 participants in structured cricket alone, without including awareness programmes (etc.) within schools in the region.

All of this is entirely under the bracket of amateur sport, with grants helping fund seasonal coaches, development officers, and provide resources towards allowing HCA provide a platform that caters to all levels and ages.

The HCA, MCC, and the cricketing platforms under the HCA bracket, can only continue to operate effectively if Option B is agreed to, and the relocation provision expanded to include gambling venues being permitted to relocate within a Gambling Permitted Area, as well as replacing the existing sinking lid policy. Without the grants that come from gambling-backed trusts, both MCC and HCA would not be able to sustain themselves.

Recommendations

Our recommendations are that the council:

- **Allows** gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B) and extends the relocation provision so gambling venues are also able to relocate **within** a Gambling Permitted Area.
- **Replaces** the existing sinking lid policy with a gaming machine cap at current numbers (457 machines).

For further information, or if you have any queries about this submission, please contact:

[Name]

[Position], Melville CC

Ph: [number]

Email: [address]

Name: Angela Paul

Organisation (if applicable): New Zealand Community Trust

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

Relocations are known to provide gambling harm minimisation benefits by allowing gambling operations to move away from at-risk communities.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

We would like to see the relocation clause expanded to allow gambling operations to relocate within a Gambling Permitted Area.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

We prefer gaming machines to be operated by gaming societies that return funds to the wider community, not just the racing industry (which is already well funded through NZRB's TAB offerings).



**Submission to
Hamilton City Council
on the proposed
Class 4 Gambling Policy**

1 October 2015

Executive summary

NZCT supports the proposal to allow gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B). However, we would like to see the relocation provision extended so gambling venues are also able to relocate **within** a Gambling Permitted Area.

The reasons for our position are:

- Research¹ shows that the *location* of gaming machines is more important than the *number* of gaming machines operating when it comes to preventing and minimising gambling harm.
- The Government has acknowledged the value of relocation clauses by requiring local councils to consider introducing them (Gambling (Harm Reduction) Amendment Act 2013).
- Relocation clauses provide sensible options for business owners who are otherwise at the mercy of building owners, who may choose to hike rents or allow premises to become run-down, because they know they have captive tenants.
- Relocation clauses provide options for councils in terms of future proofing their community. They allow councils to respond to urban growth, re-zoning and population changes.

In addition, NZCT recommends Hamilton City Council considers replacing its existing sinking lid policy, with a cap on gaming machine numbers based on today's rate (457 machines).

The reasons for this is:

- Sinking lids do not reduce problem gambling rates. Despite the 25% reduction in gaming machine numbers during the past 10 years, New Zealand's problem gambling rate has remained consistently low (around 0.3% - 0.7% of the population). The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006"².
- Sinking lids can entrench gaming operations, but ultimately they result in fewer pub gaming grants being available for local sports and community groups.

¹ Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland, Gambling & Addictions Research Centre, AUT University, 2012

² Pg 7, New Zealand 2012 Gambling Study: Gambling harm and problem gambling.

About NZCT

Established in 1998, NZCT is one of New Zealand's largest gaming trusts. Our publicans raise funds by operating gaming lounges within their hotels. In the 12 months to 30 September 2014, NZCT distributed \$39.2 million to sporting, local government and community groups nationwide.

We have twin goals of serving both our publicans and the communities in which they operate. At least 80% of the funds we distribute are directed towards sports activities, making NZCT the largest funder of amateur sport in New Zealand. We focus on sport because of the many positive benefits it offers communities, such as:

- crime reduction and community safety
- economic impact and regeneration of local communities
- education and lifelong learning
- participation
- physical fitness and health
- psychological health and wellbeing
- social capital and cohesion³.

Overseas research⁴ has found participation in sport can lead to increased health and productivity for individuals, and increased wealth or wellbeing of society as a whole.

While amateur sport is our main focus, we are also strong supporters of other worthy community activities, including local government projects. The list of grants appended to this submission shows the local organisations that have recently benefited from NZCT funding.

Who we are

We are proud of our robust grants system and of the quality of people involved with NZCT. All our trustees⁵ are highly-regarded business and community leaders with extensive governance experience. Our trustees are supported by an experienced staff and eight Regional Advisory Committees (RACs) who add local knowledge and insight to our grant decisions.

³ Sport England's Value of Sport Monitor.

⁴ http://www.ausport.gov.au/information/asc_research/publications/value_of_sport.

⁵ Alan Isaac (NZCT chairman, professional director and sports administrator), Peter Dale (former Hillary Commission chief executive), David Pilkington (professional director), Kerry Prendergast (former mayor of Wellington) and Lesley Murdoch (Olympian and former New Zealand cricket captain, broadcaster).

Current situation

In most countries, gambling is purely for commercial gain. New Zealand is different. We are one of only a few countries in the world with a 'community owned' model for pub gaming, where the proceeds are returned to the community instead of the private sector. Unfortunately, the trend is one of significant decline. Statistics from 2004 to 2014 show:

- The number of gaming venues reduced from 1,850 to 1,287 (a 30% reduction)
- The number of gaming machines operating reduced from 22,231 to 16,717 (a 25% reduction)
- Pub gaming revenue fell from \$1,035 million to \$808 million (a 22% reduction)⁶, which resulted in \$91 million less being distributed to the community⁷.

Hamilton's gaming machine numbers

Hamilton's gaming sector has declined in line with national trends. Department of Internal Affairs (DIA) gambling statistics⁸ show there are currently 30 venues and 457 gaming machines operating in Hamilton. Since 2005 the number of gaming venues has fallen 28% and the number of gaming machines has fallen 25% (in 2005 there were 42 venues and 613 machines in operation).

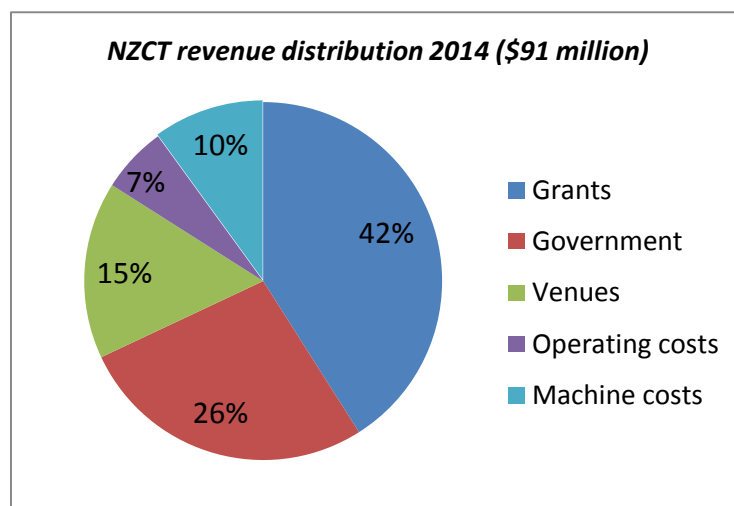
The Class 4 sector faces multiple challenges

The Class 4 gambling sector is vulnerable to a number of new cost pressures. These may contribute to (or indeed accelerate) the market decline noted above.

1. Increased minimum return

In September 2014 regulations were promulgated which set new minimum thresholds for the return of gaming funds to the community. In the first financial year following promulgation, societies must return a minimum of 40% of net proceeds (up from 37.12%). This rises to a minimum of 41% in year three and 42% in year five.

While NZCT achieved a 42% return in its last financial year, we have serious concerns about our ability to sustain this level of distribution. We expect the increased minimum return will put pressure on many gaming societies.



⁶ DIA statistics, 31 December 2004 and 31 December 2014.

⁷ Based on an average return of 40%.

⁸ DIA website, Gaming machines venues and numbers by region at 30 June 2015.

It is highly likely many societies will be forced to shed lower performing gaming venues in order to achieve the new percentage return. Such venues are typically located in smaller centres. Within the sector, there is concern that the increased percentage requirement will result in a lower overall dollar amount being returned to the New Zealand community via pub gaming grants.

2. Proposed fee increase

The DIA has proposed to increase Class 4 gambling licence fees by 53%. If this increase goes ahead it will be the equivalent of adding approximately \$1m to NZCT's annual operating costs. This additional cost will exacerbate the financial pressure imposed by the new minimum return requirement.

3. Increased competition

During the past four years, other modes of gambling (casinos, Lotteries products and the New Zealand Racing Board (NZRB)) have seen revenue increases – Lotto by 33%. While the Lotteries Commission returns funds to the community, casino profits go directly to private shareholders and the majority of NZRB distributions are directed towards the racing industry⁹. Many Lotto and NZRB products are available online, while the Class 4 gambling sector is prohibited from operating in the online space.

In addition, the public has access to many overseas gambling websites where they can spend their entertainment dollar. These sites are highly accessible (even to minors), often offer inducements to players to keep betting, have no bet size restrictions and no guaranteed return to players. They do not return any funds to the New Zealand community or the New Zealand Government. The 2010 Health and Lifestyles Survey found that 19% of survey participants played an internet game for money via an overseas website.¹⁰ According to the Problem Gambling Foundation, problem gambling rates among those who gamble on the internet are 10 times higher than that of the general population¹¹.

4. High compliance requirements

The sector is closely monitored by the DIA to ensure it complies with a multitude of rules, regulations and laws. The resources needed to meet these compliance thresholds can be prohibitive and could explain why some organisations are exiting the sector.

5. Imminent one-off costs

The introduction of new bank notes in 2015 and 2016 will require gaming operators to outlay considerable costs in terms of the software and hardware required for gaming machine note acceptor upgrades. For NZCT alone the cost of this project is around \$1m. In addition, by December 2015 all gaming machine jackpots must be downloadable. Each conversion from a manual to a downloadable jackpot costs somewhere between \$3,000 - \$20,000 per venue. Based on today's number of venues (1,266¹²), this project has added a cost burden to the sector in the order of \$3.8m - \$25m. As a result of these two projects, gaming societies have fewer funds available for distribution to the community.

⁹ Pg 6, NZRB Annual Report 2014 reports \$137.4 million total distributions, of which \$134.1m (97%) was directed to racing.

¹⁰ Pg 16, http://archive.hsc.org.nz/sites/default/files/publications/Gambling_Participation_final-web.pdf.

¹¹ Problem Gambling Foundation Fact Sheet 04, July 2011.

¹² DIA statistics, venue numbers as at 30 June 2015.

Our position

In the following pages we provide four reasons in support of gaming venues being able to relocate to new premises. We also provide six key reasons for replacing the existing sinking lid policy with a gaming machine cap at current numbers (457 machines).

Reasons to allow gaming operations to relocate:

1. Relocation clauses provide sensible options

Research¹³ by Auckland University of Technology shows that problem gambling behaviour is influenced more by the *distance* to the nearest gambling venue, rather than the *number* of gambling venues within walking distance. The Ministry of Health's 2013 Gambling Resource for Local Government acknowledges this point and states that one of the major factors associated with increased prevalence of problem gambling is "location and/or density of gambling venues and machines"¹⁴. The Ministry of Health also found "being a problem gambler is significantly associated with living closer to gambling venues"¹⁵. Therefore, allowing gaming operations to move out of high deprivation areas could potentially diminish gambling harm for at-risk communities.

2. Support local hospitality businesses

Relocation clauses also help ensure the continual improvement and growth of your local hospitality sector. Rather than tying gaming operations to a physical address, which may over time become a less desirable location, relocations allow gaming operators to move their operations to more suitable premises. The DIA has recommended relocation policies as a way of allowing territorial authorities to "future proof" their Class 4 gambling policies¹⁶. Relocation clauses also help the hospitality sector respond to consumer demand for attractive and safe entertainment environments. This is particularly important if premises are deemed unsafe or unusable for a lengthy period of time (eg: in the event of a fire or earthquake). And they incentivize building owners to upgrade their premises in order to attract and retain quality tenants (hospitality operators).

3. Respond to future demand

Relocation policies help ensure Class 4 gambling policies can accommodate urban growth, re-zoning changes or changes in population demographics. This is not possible while gambling machine entitlements are linked to a physical address.

¹³ Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland, Gambling & Addictions Research Centre, AUT University, 2012.

¹⁴ Pg 21, Ministry of Health Gambling Resource for Local Government, 2013.

¹⁵ Ibid.

¹⁶ Internal Affairs Policy Briefing 3: Options for improving territorial authority gaming machine policies, 28 March 2013.

4. Appropriate benefit/responsibility

Gaming machine entitlements run with the property at a physical address, yet property owners are not regulated under the Gambling Act. In effect, the property owner holds the power, but has limited responsibility in terms of the gambling operation. There have been instances where building owners hike rents and/or do not maintain premises, because they know they have a captive tenant where no relocation option exists. A relocation policy distributes the benefit and responsibility more fairly, enabling the gambling operator to choose where they wish to establish their business.

Reasons to replace the existing sinking lid policy with a gaming machine cap:

1. Gaming machines are a legal and valid entertainment choice

Pub gaming is a valid and enjoyable source of entertainment for residents and tourists alike. Most players, regard gaming as light entertainment and know when to stop. The Gambling Commission has reminded councils and the regulator that “... measures should only be imposed if they reduce the harm caused by problem gambling, as distinct from simply reducing gambling activity which is a lawful and permitted activity under the Act.”¹⁷

We recognise that Hamilton City Council aims, through its Long Term Plan, to balance the needs of visitors and residents while achieving economic development. We support this objective and believe a vibrant hospitality sector is a key component to achieving this. It’s important to note that pub gaming brings many benefits to New Zealand. Business and Economic Research Ltd (BERL) research¹⁸ has calculated that each year the entertainment value to recreational players is circa \$250m, the grants value to the community is circa \$250m, and the Government revenue value in the form of duties and levies is circa \$190m.

2. Gaming machines are an important component of your local hospitality sector and an important source of community funding

Local hospitality

Businesses that host gaming are typically pubs and hotels. NZCT operates two gaming venues in the Hamilton City TLA – the Eastside Tavern (18 machines) and Still Working (nine machines). These businesses contribute to your local economy, employing staff and providing hospitality options for residents and tourists.

Community funding

Since 1 October 2013, the machines at the Eastside Tavern and Still Working have enabled NZCT to distribute \$1,669,200 to community and sports groups based in Hamilton City. In addition, a portion of funds generated at all of NZCT’s Waikato venues were distributed to regional organisations (like Waikato

¹⁷ Gambling Commission decision GC16/06.

¹⁸ Maximising the benefits to communities from New Zealand’s Community Gaming Model, BERL, February 2013.

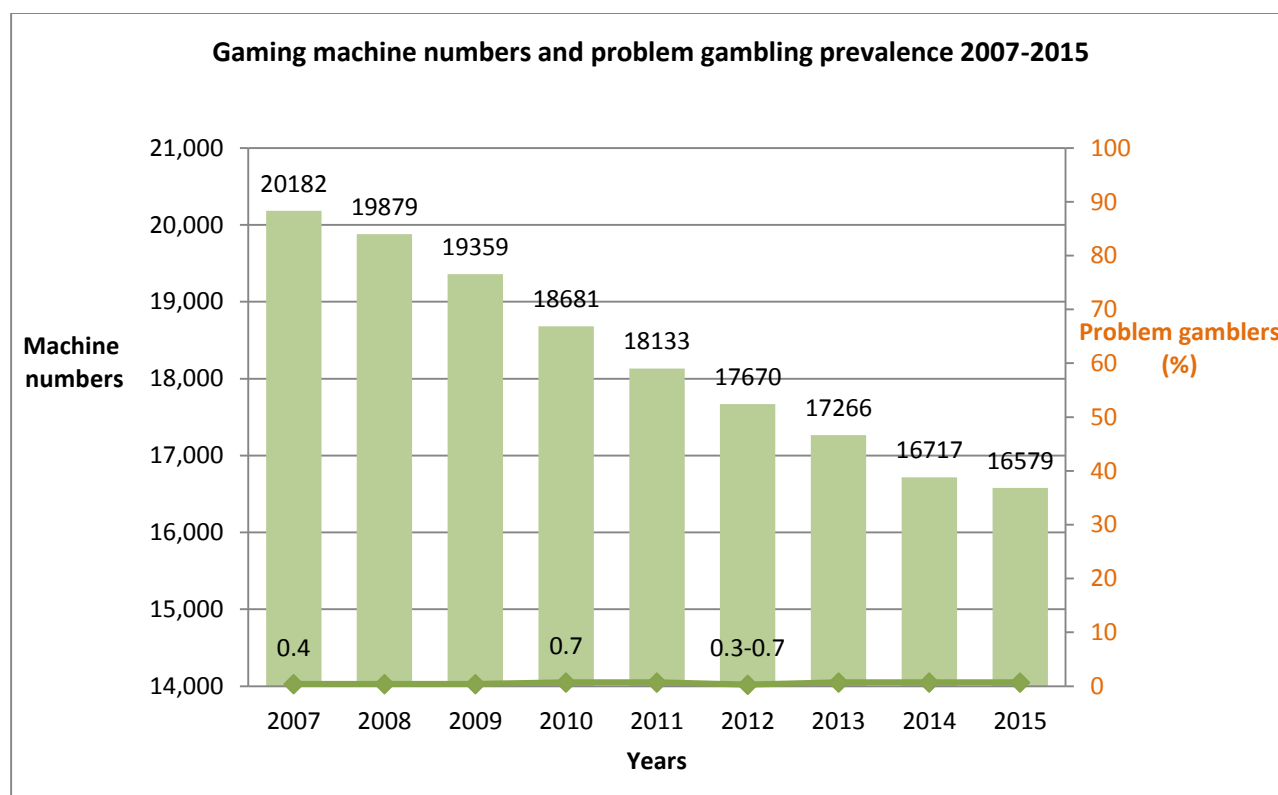
Hockey Association and Waikato Youth Empowerment Trust) who also provide benefits to Hamilton residents (see Appendix 1 for details).

Difference between societies, clubs and NZRB

It is worth noting that the pub gaming model differs from the gaming run at clubs (like RSAs) and in NZRB venues. Those entities are able to apply the funds they raise to their own purposes (eg: maintaining clubrooms or funding race meetings). For example, in its 2014 annual report, NZRB advised its distributions totalled \$137.4 million - the majority of which (97% or \$134.1 million) was used for racing purposes. In contrast, Class 4 societies like NZCT distribute *all* net proceeds to the community.

3. Gaming machine numbers have little effect on problem gambling numbers

It is misleading and inaccurate to assume that fewer gaming machines will result in fewer problem gamblers. A gambling addiction is a complex psychological condition, which is influenced by many factors. As shown in the graph below, a reduction of nearly 4,000 machines across the country between 2007 and 2015 has had almost no impact on the small percentage of problem gamblers nationally.



In the 2006/07 Ministry of Health NZ Health Survey 0.4% of the population were categorised as problem gamblers using the Problem Gambling Severity Index (PGSI). In the 2010 Health and Lifestyles Survey the rate increased to 0.7%. In the preliminary findings from the 2012 New Zealand Health Survey the rate was 0.3% of the population, but the 2012 National Gambling Survey found the rate was 0.7% of people aged 18 years and over.

Problem gambling rates have plateaued

The New Zealand 2012 National Gambling Study found that the number of people who regularly participate in continuous forms of gambling (like gaming machines) has decreased from 18% in 1991 to 6% in 2012.¹⁹ The study concluded that “Problem gambling and related harms probably reduced significantly during the 1990s but have remained at about the same level despite reductions in non-casino EGM [electronic gaming machine] numbers and the expansion of regulatory, public health and treatment measures.”²⁰

Sinking lids are ineffective

Sinking lid policies became popular because councils believed they would help reduce gambling harm in their community. However, after studying the effectiveness of different council policies, the DIA acknowledged the limitations of sinking lid policies. In a briefing paper to the Minister of Internal Affairs dated 28 March 2013, the DIA noted that “Different types of territorial authority Class 4 venue policies, such as sinking lids....make little difference on gaming machine numbers and expenditure...”. Relocation policies, which allow machines to be moved away from high risk areas, are considered more effective in reducing problem gambling than reducing machine numbers.

4. Problem gambling rates in New Zealand are relatively low

NZCT is committed to reducing and minimising the harm that can be caused by gambling. Thankfully, as can be seen in the table below, New Zealand has one of the lowest rates of problem gambling in the world²¹. The fact is relatively few New Zealanders are gambling at levels that lead to negative consequences. The majority of people who gamble know when to stop.

Country	Problem Gambling Prevalence (% population*)
New Zealand	0.3 - 0.7
UK	0.6
Norway	0.7
Australia	0.5 – 1.0
USA	2.3
Canada	2.6
*Mixture of CPGI, PGSI and SOGS scores ²²	

¹⁹ Pg 8, NZ 2012 National Gambling Study: Overview and gambling participation.

²⁰ Pg 18, *ibid*.

²¹ Maximising the benefits to communities from New Zealand’s community gaming model, BERL, February 2013.

²² A range of different measurements are available to measure problem gambling rates. CPGI refers to the Canadian Problem Gambling Index, PGSI is the Problem Gambling Severity Index and SOGS is the South Oaks Gambling Screen.

The vast majority of Hamilton residents gamble responsibly

The latest available statistics from the Ministry of Health show that during the 12 months to June 2014, 201 people in Hamilton sought help for problem gambling²³. Based on an adult population of 99,651²⁴ we can estimate that approximately 0.2% of Hamilton's adult population could be problem gamblers. This is much lower than the 0.7% rate estimated by the 2012 National Gambling Survey and the 0.3% rate estimated by the 2012 NZ Health Survey.

5. Gaming machines can only be played in strictly controlled environments

As a corporate society licensed to conduct Class 4 gambling, NZCT is fully aware of its obligations under the Gambling Act 2003. All our gaming rooms are operated by trained staff at licensed venues. The DIA is responsible for monitoring the Class 4 gambling industry (including venue 'key people', bar staff and societies) to ensure they adhere to relevant rules, regulations and legislative requirements. The penalties for non-compliance include fines, suspensions, loss of operating licence and potential criminal charges.

Strict harm minimisation obligations

A key purpose of the Gambling Act is to prevent and minimise the harm that can be caused by gambling, including problem gambling. To that end, in all Class 4 gambling venues:

- Stake and prize money is limited
- Odds of winning must be displayed
- Gaming rooms are restricted to people over the age of 18 years
- Gaming rooms can only be operated in adult environments (eg: pubs, nightclubs, clubs)
- Play is interrupted every 30 minutes with an update on how long the player has been at the machine, how much money they've spent and their net wins/losses
- \$50 and \$100 notes are not accepted
- No ATMs are allowed in licensed gambling areas
- Gaming advertising is prohibited
- The DIA monitors every gaming machine's takings
- Syndicated play is prohibited
- All venues must have staff trained in gambling harm minimisation on duty whenever gaming machines are operating
- All venues must have a gambling harm minimisation policy in place
- All venues must display pamphlets and signs directing gamblers to help services
- Venue staff must be able to issue and enforce Exclusion Orders.

²³ Intervention Client Data, Service User Data, Problem Gambling, Ministry of Health website, 2014.

²⁴ People in Hamilton aged 20 years +, 2013 census data, Department of Statistics.

NZCT's harm minimisation activities

NZCT takes all its legal obligations very seriously, none more so than those around minimising the harm which can be caused by gambling. To meet our harm prevention and minimisation requirements, NZCT provides a problem gambling resource kit to each of its gaming venues. The kit includes:

- NZCT's Harm Prevention and Minimisation Policy
- Exclusion Orders and guidance on the Exclusion Order process
- A Harm Minimisation Incident Register to record any problem gambling issues and action taken by staff
- Problem gambling pamphlets for distribution.



NZCT also provides all its gaming venues with harm minimisation signs to display in and around the gaming area.

Training

NZCT provides problem gambling training to staff at each of its gaming venues (during 2014 we provided harm min training to 394 venue staff). Trainers deliver a presentation on problem gambling and take staff members through each part of the problem gambling resource kit in detail. Refresher training is also provided at regular intervals. Gaming venues are continually reminded of their obligation to ensure a person trained in harm minimisation is on duty.

6. Support is available for problem gamblers

Each year the gambling industry pays around \$18.5m to the Government (in the form of a Problem Gambling Levy) so the Ministry of Health can implement its Preventing and Minimising Gambling Harm Strategic Plan (PMGH). These funds pay for the implementation of public health services, intervention services, research, evaluation and workforce development.

Encouragingly, two of the findings from the inaugural PMGH baseline report were: problem gambling services are effectively raising awareness about the harms from gambling and; interventions for gambling-related harm are moderately accessible, highly responsive and moderate to highly effective²⁵.

It is also pleasing to note that the world's largest clinical trial²⁶ for problem gambling treatment found that, one year after calling the Gambling Helpline, three-quarters of callers had quit or significantly reduced their gambling. This research provides a level of assurance for local communities, councils and the Government.

²⁵ Pg 16, Outcomes Framework for Preventing and Minimising Gambling Harm Baseline Report, May 2013.

²⁶ The Effectiveness of Problem Gambling Brief Telephone Interventions, AUT, Gambling & Addictions Research Centre.

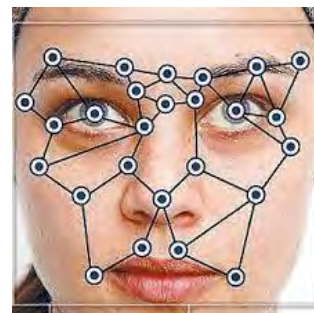
What does the future hold?

Online gambling a growing trend

In the United Kingdom about the same proportion of gamblers who play gaming machines in person, play online²⁷. Unfortunately the NZ Health Survey does not cover online gambling, but we can assume the numbers here are not too different to the UK. This is a major concern for the gaming sector and your community. It must also be a concern for your council. Not only is there no help available for online gamblers, but the money gambled does not return any funds to the community or the government.

Harm minimisation tool being trialled

NZCT is assisting with the trial of a potentially ground-breaking harm minimisation tool. Using the facial recognition software found at international airports, a local Hamilton company has developed a version that will cause a gaming machine to stop playing when it recognises a problem gambler that has requested to be excluded from playing. Subject to this software being approved by the regulatory authorities for use in the Class 4 gambling sector, this tool could be available in 12 to 18 months.



Summary

We appreciate Hamilton City Council wants to do its best to protect its residents from any potential harm that may be caused by gambling. Thankfully New Zealand has a relatively low problem gambling rate and there is effective help available to those who need it. The Class 4 gambling sector exists to generate funds for the community. This model is working well, with thousands of people benefitting from the financial support provided to community and sports groups.

Unfortunately the Class 4 gambling sector, and therefore the money it generates for the community, is declining. If current trends continue, there could be a real funding shortfall for such groups in future. Our view is that it is unnecessary and undesirable to place any further restrictions which could limit the ability of gaming societies to generate community funds. The best harm minimisation tool available to councils is allowing gaming venues to relocate out of highly deprived areas. Removing this option, and having a sinking lid policy, simply entrenches existing operators.

²⁷ British Gambling Prevalence Survey 2010, the Gambling Commission.

Recommendations

Our recommendations are that the council:

- **Allows** gambling venues to relocate from outside a Gambling Permitted Area to inside a Gambling Permitted Area (Option B) and extends the relocation provision so gambling venues are also able to relocate **within** a Gambling Permitted Area.
- **Replaces** the existing sinking lid policy with a gaming machine cap at current numbers (457 machines).

For further information, or if you have any queries about this submission, please contact:

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Appendix 1: NZCT Hamilton and regional grants

Since 1 October 2013, NZCT distributed 147 grants to the value of \$1,669,200 sports and community groups in your area. We also funded 14 regional organisations that provide benefits to Hamilton residents.

Hamilton City grants

Organisation	Amount	Purpose
Athletics Waikato Bay of Plenty Inc	\$ 8,000	Towards salary of Coachforce Dev Officer based in Bay of Plenty region from September
Athletics Waikato Bay of Plenty Inc	\$ 20,000	Upgrade of the Athletics facilities at Porrit Stadium
Athletics Waikato Bay of Plenty Inc	\$ 7,000	Towards salary of Coachforce Development Officer - Bay of Plenty region
Autism N Z Inc Waikato Branch	\$ 20,000	Towards salary of Information and Support Coordinator from January 2014
Balloons Over Waikato Charitable Trust Inc	\$ 5,000	Sound, portaloos hire, printing and banner costs for event in March 2014
Balloons Over Waikato Charitable Trust Inc	\$ 5,000	Lighting & Power, Propane for costs assoc'd with Balloons over Waikato in 2015
Basketball Pacific Inc	\$ 30,000	Towards accom for refs and coaches, venue hire, vehicle hire and printing of progs for Easter Tourn in Mt Maunganui
Beerescourt Bowling Club Inc	\$ 1,000	Towards chemicals and fertilisers
Beerescourt Tennis Club Inc	\$ 1,500	Towards tennis balls and rackets, and Junior coaching from January 2014
Claudlands Rovers Football Club Inc	\$ 3,000	Towards new playing strips for senior football teams
Claudlands Rovers Football Club Inc	\$ 1,000	Towards van hire for away games from June 2015
Creators Educational Trust Inc	\$ 7,500	Youth bikes and stationary trainers for dev of youth triathlon in Waikato
Deanwell School	\$ 5,000	Towards kapahaka uniforms (via Kanikani Kids quote)
Deanwell School	\$ 2,000	Towards purchase of benches and chairs for school hall
Eastlink Badminton Society Inc	\$ 3,000	Towards cost for repair to ladies showers and new vinyl
Ebony Kings Youth Sports Club	\$ 3,000	Towards uniforms for youth teams
Fairfield Swim Club Inc	\$ 1,000	Towards pool hire from November 2013
Fairfield Swim Club Inc	\$ 1,500	Towards van hire & accom to National Grade Championships in Wellington
Fitness Action Charitable Trust	\$ 9,000	Towards traffic mgmt, timing services & portble toilets Hamilton Half Marathon
Fitness Action Charitable Trust	\$ 5,000	Towards race timing and traffic management services for Hamilton Half Marathon in October 2015
Flagstaff Club Inc	\$ 3,000	Towards playing uniforms, training balls, bibs and gear bags for netball teams
Fraser Tech Hockey Club	\$ 3,000	Towards uniforms, training equipment, and venue hire from June 2014
Fraser Technical Cricket Club Inc	\$ 4,000	Towards equipment, balls, uniforms and scoreboard
Fraser Technical Cricket Club Inc	\$ 5,000	Towards ground fees, scoreboard, equip, coaching & net hire from October 2014

Glenview United AFC Incorporated	\$ 1,000	Towards footballs for 2015 season
Hamilton Badminton Club	\$ 2,000	Towards shuttlecocks, court hire and coaching from November 2013
Hamilton BMX Club Inc	\$ 6,500	Towards installation of 3phase Mains power cables at the clubs' track
Hamilton City Hawks Athletics Inc	\$ 1,000	Towards hire of equipment,photo finish,PA system,results service and security for Porritt Classic Athletic meeting
Hamilton City Hawks Athletics Inc	\$ 1,000	Security, online entries, and Athletics WBOP services and equipment, for Porritt Classic in Hamilton
Hamilton City Netball Centre Inc	\$ 2,000	Travel and accom to Netball Championships in Wellington
Hamilton Cricket Association Inc	\$ 45,000	Towards salary of Genreral Manager, representative and seasonal coaching
Hamilton Cricket Association Inc	\$ 30,000	Towards salaries of General Mgr, seasonal and men's coaches from Nov 2014
Hamilton Cricket Association Inc	\$ 10,000	Towards salary of General Manager and seasonal coaches from May 2015
Hamilton Girls High School	\$ 5,000	Towards equipment for Rugby teams, van hire and accom for Touch teams to compete at National Sec Schools Champs
Hamilton Group Riding for the Disabled Inc	\$ 20,000	Towards cost to build stables
Hamilton In-line Hockey Club Inc	\$ 5,000	Towards salary of Inline Hockey Development Officer from March 2014
Hamilton Korean Badminton Club	\$ 800	Shuttles, court hire and coaching fees
Hamilton Light Horse Club Inc	\$ 2,500	Towards cost to construct a 60 x 40 m sand arena
Hamilton Marist Rugby Football Club Inc	\$ 3,000	Towards repairs and maintenance to Marist Park field lighting
Hamilton Motor Cycle Club Inc	\$ 1,000	Towards St John's services for a two day event in Cambridge
Hamilton Old Boys Cricket Club Inc	\$ 15,000	Towards ground fees, scoreboard, equipment, balls and uniforms
Hamilton Old Boys Squash Club	\$ 1,000	Towards squash rackets
Hamilton Roller Skating Club Inc	\$ 12,000	Construction of an international size banked track for speed skating
Hamilton Squash and Tennis Club Inc	\$ 2,000	Towards installation of an on-line booking system
Hamilton Squash and Tennis Club Inc	\$ 2,000	Towards cost for clubhouse roof repair
Hamilton Star University Cricket Club Inc	\$ 1,500	Towards equipment and hats
Hamilton Star University Cricket Club Inc	\$ 2,500	Towards Cricket Balls, Shirts and Pants
Hamilton Volleyball Club Inc	\$ 2,000	Towards accom and van hire to NZ Volleyball Club Champp 11-16 August 2015
Hillcrest Scout Group	\$ 1,000	Towards first aid course in June 2014
Hukanui Golf Club Inc	\$ 3,000	Towards SNAG Golf equipment
Ignite Marching Team	\$ 1,000	Towards accommodation to attend NZ Marching Championships in Porirua
Ignite Marching Team	\$ 1,000	Towards airfares to compete at N Z Marching Champs in Chch March 2015
Kapa Kuru Pounamu Inc	\$ 3,000	Towards costumes for various events
Marist Womens Hockey Club Inc	\$ 1,000	Towards turf fees from 16 April 2014
Melville Cricket Club Inc	\$ 8,000	Towards ground hire, cricket balls, and uniforms (excluding caps)

Melville Cricket Club Inc	\$ 4,000	Towards playing uniforms and Coaching from January 2015
Melville High School	\$ 2,500	Towards travel and accom to Nat'l Sec Schools Kapa Haka Comp in Gisborne
Midlands Hockey Inc	\$ 50,000	Towards salaries of Exec Director ,Exec Officer and High Perf Dir from December
Midlands Hockey Inc	\$ 5,000	Towards accom costs for a team of elite athletes to compete in Auckland
Midlands Hockey Inc	\$ 40,000	Towards salaries of Operations & Dev and Regional Perf Mgrs from January 2015
Midlands Hockey Inc	\$ 4,000	Towards accom for Nat'l Hockey League Tournaments, 12-20 September 2015
Millataires Waikato Marching Team	\$ 1,000	Towards accom at Marching Nationals in Wellington, March 2014
N Z Council of Victim Support Groups Hamilton, Coromandel, Taumarunui	\$ 6,000	Hamilton, Coromandel, Taumarunui Service coordinator Towards salaries of CEO & Dev Officer, vehicle lease, banners, accom and van hire
Netball Waikato Bay of Plenty Zone Inc	\$ 79,000	Towards accommodation, vehicle leases, salaries from April 2015
Netball Waikato Bay of Plenty Zone Inc	\$ 135,000	Towards purchase of a W6 waka ama
Nga Hau e Wha Whanau Hoe Inc	\$ 10,000	Towards a surrounds mower
Ngaruawahia Golf Club Inc	\$ 5,000	Salaries of Thames/Coromandel and Central BOP FDOs, RDO, Admin and Mgr
No 3 District Federation of New Zealand Soccer Inc	\$ 150,000	Towards travel, accom and ground hire, for NZ Football National Age Group Tournament
No 3 District Federation of New Zealand Soccer Inc	\$ 17,000	Towards salaries for Nat Leagues Mgr, FDO's, Women's Dev Officer, Referees Dev Officer, Admin, Futsal and Football Dev Mgrs
No 3 District Federation of New Zealand Soccer Inc	\$ 150,000	Towards travel, accom for NZ Football National Age Group Tournament in Wgtn
No 3 District Federation of New Zealand Soccer Inc	\$ 18,000	Towards travel and accom to Palmerston North and Wellington for representative tournaments
North Waikato Schoolboys Rugby League Inc	\$ 2,000	Towards van hire and accom for U15 Rugby League Tournament in Rotorua
North Waikato Schoolboys Rugby League Inc	\$ 2,000	Towards salaries of Operational staff from 19 November 2013 and vehicle costs
Northern Districts Cricket Association Inc	\$ 100,000	Towards salaries and office rental from 20 May - 30 June 2014
Northern Districts Cricket Association Inc	\$ 20,000	Towards salaries of Operational staff and office rental from November 2014
Northern Districts Cricket Association Inc	\$ 100,000	Towards salary of Cricket Development Officer from May 2015
Northern Districts Cricket Association Inc	\$ 15,000	Towards basketball coaching from August 2014
Onewhero Area School	\$ 900	Towards piupiu's
Onewhero Area School	\$ 2,000	Towards handheld radios and vehicle diagnostic system
Order of St John Central Region Trust Board	\$ 30,000	Towards accom and kayaking for Years 6 and 7 Camp in Taupo, March 2014
Puketaha School	\$ 1,500	Telephone system upgrade
Rape and Sexual Abuse Healing Centre	\$ 1,700	Towards a new rowing eight boat
Sacred Heart Girls College	\$ 5,000	Towards a new coach boat
Sacred Heart Girls College	\$ 7,500	

Sport Waikato Education Trust	\$ 50,000	Towards salaries of Community Sport Mgr and Secondary Schools Sport Director
Squash Waikato Inc	\$ 2,000	Towards court hire and coaching for Development Prog from 16 February 2015
St Johns College	\$ 2,000	Towards travel and accom to Wellington and Palmerston North in August 2014
St Johns College	\$ 10,000	Towards a coxed four/quad rowing skiff
St Peters Chanel School	\$ 1,500	Towards sports equipment
St Peters Tennis Club	\$ 5,000	Towards tennis coaching from September 2014
Swim Waikato Inc	\$ 15,000	Towards salary of the Waikato Regional Recorders Assist from December 2013
Swim Waikato Inc	\$ 5,000	Towards salary of Waikato Regional Recorder's Assistant from 15 July 2014
Swim Waikato Inc	\$ 5,000	Towards salary of events and admin support position from September 2015
Te Hono A Te Kiore Netball	\$ 1,000	Towards accom for teams competing in Kurangaituku Tournmt in Rotorua
Te Kowhai School Board of Trustees	\$ 5,000	Towards sports uniforms
Te Rapa Badminton Club Inc	\$ 1,500	Towards hall hire costs from May 2014
Te Rapa Badminton Club Inc	\$ 1,000	Towards hall hire for 2015 season
Te Rapa School	\$ 2,000	Towards sports equipment and singlets
Te Rapa Squash Club Inc	\$ 1,000	Towards playing shirts, skorts and accom at Squash Nat'ls in North Shore
Toku Mapihi Maurea Whanau Tautoko Incorporated	\$ 10,000	Towards erection of a senior playground and replaced by a junior playground
Verdettes Netball Club	\$ 3,000	Towards playing uniform and equipment gym hire from 20 April 2014
Volunteering Waikato	\$ 5,000	Towards salary of Volunteer Coordinator from May 2014
Volunteering Waikato	\$ 2,900	Towards salary of Community Project Co-ordinator from December 2014
Waikato Agricultural & Pastoral Association Inc	\$ 9,000	Towards salary of Show and Administration Manager from November 2013
Waikato Agricultural & Pastoral Association Inc	\$ 10,000	Towards salaries of Show Manager and Administrator from May 2014
Waikato Agricultural & Pastoral Association Inc	\$ 10,000	Towards salaries of Sec & Mgr, and costs of running show from 20 October 2014
Waikato Agricultural & Pastoral Association Inc	\$ 5,000	Towards salaries of Show Manager and Secretary/Administrator from April 2015
Waikato Badminton Assn Inc	\$ 3,000	Towards playing shirts
Waikato Badminton Assn Inc	\$ 10,000	Towards salary of CEO from April 2014
Waikato Badminton Assn Inc	\$ 5,000	Towards salary of Chief Executive Officer from April 2015
Waikato Basketball Council	\$ 12,000	Towards Miniball and Midweek Ref & Floor Controller wages from 15 July 2014
Waikato Basketball Council	\$ 1,000	Towards playing singles and shorts
		Towards purchase of basketballs and accom for U17 girls at Nationals in Auckland, July 2015
Waikato Basketball Council	\$ 2,000	
Waikato Community Hospice Trust	\$ 15,000	Purchase of vehicles for Allied Health Team and Hospice@Home nurses
Waikato Community Hospice Trust	\$ 10,000	Towards salary of Clinical Nurse Specialist operating in Thames-Coromandel
Waikato Diocesan School Rowing Club Inc	\$ 5,000	Towards cost of a new 8 rowing skiff

Waikato Diving Inc	\$ 1,500	Towards pool hire from Term 4
Waikato Dragonboating & Waka Ama Assn Inc	\$ 5,000	Towards dragonboats and trailer
Waikato Football Club Inc	\$ 19,000	Entry fees for 2015 National Men's & Youth Leagues
Waikato Golf Assn Inc	\$ 7,000	Towards salary of Administrator from November 2013
Waikato Indoor Sports Club Inc	\$ 7,500	Towards travel and accommodation and training facility hire from June 2014
Waikato Indoor Sports Club Inc	\$ 5,000	Towards accom and van hire for National and North Island Champs in Auckland
		Towards travel and accom to inter provincial competition in Napier, 24-27 October 2014
Waikato Junior Golfing Society Inc	\$ 1,400	
Waikato Maniapoto Maori Hockey Inc	\$ 8,000	Purchase of playing uniform for a tournament in Christchurch
Waikato Paraplegic & Physically Disabled Assn Inc	\$ 4,000	Contract fee for Sportsforce Programme
Waikato Punjabi Badminton Club Inc	\$ 2,000	Towards shuttles
Waikato Punjabi Badminton Club Inc	\$ 2,000	Towards shuttles
Waikato Table Tennis Association Inc	\$ 2,000	Towards travel and accom to NZ Jnr Open in Palmerston North, 16-20 July 2014
Waikato Touch Association Inc	\$ 7,500	Towards salary of Administrator from 20 October 2014
Waikato Unicol AFC Inc	\$ 3,000	Towards equipment and uniforms
Waikato Unicol AFC Inc	\$ 2,000	Towards equipment, first aid kits for 2015 season
Waikato University Hockey Club Inc	\$ 2,000	Towards equipment and turf fees from April 2014
Waikato University Hockey Club Inc	\$ 2,000	Towards hockey balls, goalie gear, and coaching from April 2015
Waikato University Netball Club Inc	\$ 1,000	Towards balls, and first aid and training equipment (excluding backpacks)
Waikato University Netball Club Inc	\$ 1,000	Towards playing uniforms and equipment
Waikato University Rowing Club	\$ 3,000	Towards salary of Head Coach from August 2014
Waikato University Rowing Club	\$ 2,500	Towards salary of Head Coach, Club Coord from March 2015 and playing singlets
Waikato University Rugby Football Club Inc	\$ 8,000	Towards playing uniform and equipment for 2014 season
Waikato University Rugby Football Club Inc	\$ 6,000	Towards equipment, uniforms, field hire, coaching and travel
Waikato Valley Cricket Association Inc	\$ 8,000	Towards wages of Jnr & Snr Rep coaches and Mgr from December 2013
Waikato Valley Cricket Association Inc	\$ 5,000	Towards wages of Jnr and Snr Rep coaches and Development Coach
Waikato Water Polo Club Inc	\$ 1,500	Towards van hire for National Age Group teams to Tauranga, Wgtn & Auckland
Waikato Water Polo Club Inc	\$ 2,000	Towards van hire for National age grade teams to attend National Tournaments
Wanderers Sports Club Inc Hamilton	\$ 10,000	Towards wages of Junior Development Coach from December 2013
Wanderers Sports Club Inc Hamilton	\$ 3,000	Towards soccer balls for 2015 season
Western United Assn Football Club	\$ 1,000	Towards playing shirts
YWCA of Hamilton Inc	\$ 2,000	Towards wages of Hamilton's Mobile "Meals on Wheels" Chef
	<u>\$ 1,669,200</u>	

Grants made to regional organisations that benefit Hamilton City residents

Organisation	Amount	Purpose
Alzheimers Waikato Charitable Trust	\$ 5,000	Towards wages of Support Coordinator from January 2015
Bowls Waikato Inc	\$ 2,500	Towards travel and accommodation to Inter-Centre Competition in Christchurch
Hamilton Golf Club	\$ 8,000	Purchase a new submersible pump which is a vital part of irrigation system
M S Waikato Trust	\$ 3,000	Towards salary of Administration Manager from March 2014
National Equestrian Centre Taupo	\$ 50,000	Towards construction of indoor horse arena/amenities complex
Philips Search & Rescue Trust Inc	\$ 50,000	Towards overhaul of winch for rescue helicopter
Philips Search & Rescue Trust Inc	\$ 100,000	Equipment upgrade to Palmerston North Rescue Helicopter
Waikato Hockey Assn Inc.	\$ 20,000	Towards salaries of CEO, Hockey Manager, and Kiwisport Officer
Waikato Hockey Assn Inc.	\$ 10,000	Towards salaries of CEO, Hockey Manager, and Kiwi Sport Officer
Waikato Region BMX Association Inc	\$ 2,000	Towards St John services at race meetings from December 2014
Waikato Regional Volleyball Association, Incorporated	\$ 5,000	Towards salary of Kiwisport Development Officer from May 2014
Waikato Rowing Regional Performance Centre Inc	\$ 5,000	Towards purchase of eight pairs of sculling oars
Waikato Youth Empowerment Trust	\$ 2,000	Purchase of computers for Regional office
Waikato Youth Empowerment Trust	\$ 2,000	Towards salaries for Kiwi Can Leaders for September 2014
	<u>\$ 264,500</u>	

Name: E. Lamont-Messer

Organisation (if applicable): The Lion Foundation

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

Please see attached submission (pdf file).

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

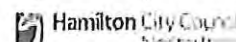
Other Comments:

See attached submission on Class 4 Gambling Venue Policy.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Not Answered



HAMILTON CITY GAMBLING POLICIES SUBMISSION FORM – 2015

SECTION 1

Name: E. Lamont-messerCompany / Organisation (if applicable): The Lion FoundationStreet Number & Name or PO Box: Level 2, Custom House50 Anzac Ave, Auckland 1010

Suburb: _____ Town/City: _____ Post Code: _____

Phone (day): 09 4870390 Phone (evening): _____Email: emma.lamont-messer@lionfoundation.org.nz

All submissions are treated as public documents and will be loaded on to the Council's website with names and details and submitters included. If you have any questions about making a submission please phone 07 838 6537.

Important

Do you wish to speak about your submission at a Council hearing?

☒ Yes ☐ No

If you do not tick a box we will assume that you do not wish to speak at a hearing.

Hearings are anticipated to be held end of October 2015. Please note if you indicated that you wish to be heard, we will contact you once hearing dates have been finalised.

SECTION 2: CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining relocation provisions in the policy providing the situations where relocations could take place were be limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

We would like to know your preference to inform Council decision making on this issue.

1. Which relocation option do you support? (Please tick one option)

Option A (no relocation allowed/true sinking lid) ☐Option B (restricted relocation allowed) ☒

Comments

please see attached submissions
(PDF file)

2. Do you have any comments on the following issues as proposed in the policy?

Location Restrictions

Proximity Restrictions

Other Comments

*see attached submissions
on class 4 Gambling venue Policy.*

SECTION 3: TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy in principal? ☐ Yes ☐ No

Comments

Submissions can be:

- submitted online: www.hamilton.govt.nz/gamblingreview
- posted to Freepost 172189, Strategy & Research Unit, Hamilton City Council, Private Bag 3010, Hamilton 3240
- delivered to the main reception, ground floor of the Council Building, Garden Place

Important Reminder: Submissions must reach Council by midnight on 2 October 2015. Late submissions will not be accepted.



Submission to Hamilton City Council on Proposed Review of Gambling Policies

September 2015

This submission outlines The **Lion Foundation's response to the** Hamilton City Council proposal to review the Draft Class 4 Gambling Policy.

The closing date for submissions is **2 October 2015**.

Relocation options

The Council has had a sinking lid policy since 2010. This means it has not been possible to make an application for a new class 4 venue consent, except in the case of club mergers, where a venue has been rendered physically incapable of being reused, or where an existing venue is permanently closed as part of an application.

The Council is reviewing this Policy, and is considering two options for the issue of new venue consents:

- **Option A:** two or more private clubs merge (no relocation allowed).
- **Option B:** two or more private clubs merge **or** a society undertakes to permanently close an existing class 4 venue located outside a Gambling Permitted Area to relocate within a Gambling Permitted Area (restricted relocation allowed).

Our submission

The Lion Foundation supports the relocation provisions in the current policy. There can be many reasons for a venue operator to consider moving premises, including end of lease, sale of land and buildings, planning changes, or unforeseen natural events. A generous relocation provision provides some protection to venue operators and their businesses when faced with these situations.

As maintaining the status quo is not an option for the purposes of this consultation process, we submit that the Council adopt **Option B** (restricted relocation) to ensure that venue operators are able to relocate gaming venues within the Gambling Permitted Areas as established by the Council.

However, we feel the new policy should clarify the situation for venues already located within a Gambling Permitted Area. It appears that if these venues were to become physically unusable (eg due to fire, flood or other unforeseen event) they would not qualify for a new consent. This seems to be inequitable, when under the current policy such venues could have obtained consent for alternative premises.

We support Option B for the reasons set out below.

Support the hospitality sector

In the right environment, gaming is a key component of a total entertainment package offered to the Hamilton community by the hospitality industry. Allowing

existing venues to relocate to within the prescribed Gambling Permitted Areas achieves positive outcomes for the hospitality sector.

Relocation demonstrates support for existing operators outside the Gambling Permitted Area who have been operating for a number of years. Relocation has **formed part of the Hamilton City Council's class 4 policy** since the policy was first adopted in 2004. It is not desirable for this provision to be removed from venue operators who are already dealing with other major regulatory reforms.

Disallowing relocation (a true sinking lid policy) may have the consequence of discouraging hospitality operators establishing new businesses, and may also lead to job losses within the hospitality industry.

Council retains control

One of the reasons that the Gambling (Gambling Harm Reduction) Amendment Act 2013 was introduced was to provide a tool for territorial authorities to help address the concentration of gaming machine venues in high deprivation areas.

Allowing existing venues to relocate will ensure that the Council maintains overall control of gaming venues. Over time, all class 4 venues will be consolidated into the Gambling Permitted Areas, with no actual increase in the number of machines. The sinking lid policy means that there will still be natural attrition in venues and machines.

The Council also retains control through the exercise of the location and proximity restrictions.

Retain community funding

Ensuring that money from gambling benefits the community is one of the statutory purposes of the Gambling Act 2003.

Class 4 venues generate funding for community causes in a way that casino gambling does not. When new venues cannot establish or existing venues cannot relocate, that funding is necessarily reduced or eliminated altogether. This affects the community funding infrastructure and increases the demand for funding from other local sources.

There is a significant reliance on gaming trusts for community funding. Research undertaken by Auckland Council¹ for their gambling policy review clearly demonstrates the reliance on gaming funds to support community causes. A total of 990 grant recipients were contacted and 192 completed an on-line survey. One of the key findings from the research is that 75% of respondents indicated their organisation is moderately or totally reliant on this source of funding. Over two-

¹ Auckland Council Research - Community Funding: A Focus on Gaming Grants, Sept 2012

thirds (68%) thought they would be unlikely to find another source of funding if gaming funding was unavailable.

If operators can relocate their gaming rooms they will be able to maintain this source of funding.

Consistency and continuity

The most recent Class 4 policy review undertaken by the Hamilton City Council was in August 2013. The Lion Foundation lodged submissions for that review, supporting the ability of venue operators to relocate gaming venues within the Gambling Permitted Areas as established by Council.

The Council has been divided on the issue of relocation. The Statement of Proposal indicates that half of the Council support the retention of relocation provisions, providing it was restricted in the manner that has been proposed.

We see a benefit in maintaining a relocation provision, even if it is restricted. It provides continuity for current class 4 operators, at a time when the gambling sector is undergoing significant change.

Summary

Relocation strikes a balance **between the Council's overall objectives in relation to** class 4 gambling, while allowing it to support local businesses and retain important community funding.

The Lion Foundation supports the retention of the current relocation provisions, but for this consultation process, we submit that the Council adopt **Option B** (restricted relocation) to ensure that venue operators outside the Gambling Permitted Areas are able to relocate gaming venues within the Gambling Permitted Areas.

For further information please contact Emma Lamont-Messer or Phil Steele at The Lion Foundation on emmalamontmesser@lionfoundation.org.nz or philip.steele@lionfoundation.org.nz

Name: Bert & Robyn Jackson

Organisation (if applicable): Voice Waikato network

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

Voice Waikato is an informal network which has lobbied on a number of Hamilton community issues. We have always been able to demonstrate that we reflect a considerable swathe of public opinion.

We now continue, as in 2013, to urge a true sinking lid policy for pokie gambling machines. The opinions we have canvassed this time continue to be overwhelmingly in favour of this policy. To date, no-one has favoured Option B.

Pokies are the primary cause of gambling addictions and their resulting harm. They are associated with financial distress, family stress and breakdown, crime and other consequences for individuals, families and the community. We said in 2013: Voice Waikato urges a complete sinking lid policy, without exceptions for venue relocations or mergers, because:

- pokies are nothing less than a scourge in our society, and reducing or getting rid of them is a social priority;
- though low-income people at present are excessively affected, better-off people, and those patronising social and sports clubs, are also vulnerable to addictions;
- a key is to make pokies less and less accessible, and this must include in club, sports and similar venues;
- some venues claim to monitor or provide help for customers with gambling problems, but surely this is too little, too late, and simply amounts to a difficult attempt at a remedy when addiction has already done much harm.

We also repeat that we value the good work done by sports and other bodies currently receiving pokies funding. Many of us are involved in community organisations, and we understand the challenge of fund-raising. However, pokies funding is too harmful, and groups receiving it need to transition away from it.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Not Answered

Name: Barry Rieper

Organisation (if applicable): Clubs New Zealand

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

See attached submission

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Clubs New Zealand Submission

Review of the Hamilton City Council

Class 4 Venues Gambling Act Policy

Clubs New Zealand

Clubs New Zealand Incorporated is a not-for-profit organisation that represents more than 300 chartered clubs across communities throughout New Zealand including cosmopolitan clubs, workingmen's clubs, returned service associations, commercial traveller clubs and sporting clubs.

Clubs Located in Hamilton City

The following clubs in Hamilton City have gaming machines:

- Hamilton Combined Returned Services Club
- Hamilton Cosmopolitan Club
- Hamilton Workingmen's Club
- Glenview Club

Policy Review

Clubs New Zealand and the local member clubs support Option B (restricted relocation allowed). It is submitted that the policy should be redrafted to provide for the unique provisions in the Gambling Act 2003 that apply only to clubs, namely to:

- Allow two clubs that merge to host up to 30 gaming machines (section 95 of the Gambling Act); and
- Allow an existing club with 18 gaming machines to relocate and retain its 18 gaming machines (section 96 of the Gambling Act 2003).

Council's current policy clause 5.3(ii) does provide for club mergers. However the policy will only permit the maximum number of 24 gaming machines to be the sum of the number of gaming machines in all of the corporate societies' (the clubs that are merging) Class 4 venue licences at the time of application.

Council's proposed policy Option B would allow a club(s) to relocate and retain its current number of machines but only if the class 4 gambling venue area is inside of the Gambling Permitted Area.

Club Mergers and 30 Machine Sites Expressly Permitted by the Gambling Act 2003

It is a sign of the times that to survive clubs must think outside the square, work smarter and consolidate their assets and equity.

A number of clubs throughout New Zealand have or are in the process of merging or amalgamating with other clubs. This is creating better facilities for their members and more opportunities for clubs to support their communities.

The Gambling Act 2003 recognises that clubs offer a uniquely safe and secure gaming environment. Section 95 of the Gambling Act 2003 (a copy is set out in Schedule A) makes an express exemption for clubs from the general limits on gaming machine numbers. Section 95 permits a club venue to host up to 30 machines when two long standing clubs with gaming machines merge and operate from one single venue.

However, before the clubs can merge they first need to obtain territorial authority consent to host up to 30 machines and then the consent of the Minister of Internal Affairs to proceed with the merger.

Examples of previous club mergers are detailed in Schedule B.

Allowing club mergers and a 30 machine site will not result in a large number of merger applications. To qualify for Ministerial consent the clubs under section 95 must:

- Demonstrate a significant history of operating as a non-commercial club;
- Demonstrate a significant history of operating gaming machines;
- Operate from non-commercial premises; and
- Demonstrate that the merged club will have a substantial active membership.

The merger of two clubs is seen as a positive harm minimisation step. A merger results in:

- A reduction in gaming venues (from 2 to 1);
- A reduction in the total number of machines (two 18 machine sites i.e. 36 machines, being reduced to one venue with 30 machines); and
- A large single venue which can provide enhanced harm minimisation measures through specialisation and the concentration of dedicated resources.

The ability to merge and host up to 30 machines is limited only to clubs. Two commercial pubs cannot merge and increase their gaming machine numbers.

It is reasonably common for councils to permit club mergers. The following are some of the Territorial Authorities across the country that allows clubs which merge to host up to 30 machines:

- Central Otago District Council
- Clutha District Council
- Dunedin City Council
- Hastings District Council
- Horowhenua District Council
- Hutt City Council
- Invercargill City Council
- Kaipara District Council
- Kapiti Coast District Council
- Manawatu District Council
- Manukau City Council

- Marlborough District Council
- Matamata-Piako District Council
- Nelson City Council
- Porirua City Council
- Ruapehu District Council
- Tauranga City Council
- Thames-Coromandel District Council
- Upper Hutt City Council
- Wellington City Council
- Western Bay of Plenty District Council
- Whangarei District Council

Council is invited to review its proposed policy by including the following provision:

Two or more non-commercial clubs that merge may consolidate the number of gambling machines operated at the merged non-commercial club venue to the lesser of:

- a. 30 gambling machines; or
- b. the sum of the number of gambling machines previously operated by each non-commercial club individually.

Clubs Relocation and Retention of 18 Machines

When a gaming venue relocates it is considered to be a new venue and accordingly is limited by the Gambling Act 2003 to a maximum of 9 gaming machines. Due to the unique nature of clubs, section 96 of the Gambling Act 2003 (a copy of which is set out in Schedule C) expressly allows a club with a substantial active membership to apply for Ministerial consent to increase the number of machines hosted from 9 to 18 at a relocated site.

Some examples of when section 96 has been used to allow a club to relocate are set out in Schedule D.

Council is invited to review and amend its proposed policy by including the following provision:

Notwithstanding any other provision in this policy, a non-commercial club may relocate and operate up to 18 gaming machines. It is noted that before a club can increase its machine numbers above 9 at the relocated site it must apply under section 96 of the Gambling Act 2003 and obtain the formal consent of the Minister of Internal Affairs.

Allowing a club to relocate and retain its gaming offering recognises that there are circumstances where it is either desirable or in fact necessary for a club to establish at a new site.

The ability to relocate gives a club the ability to consider more economical premises in hard economic times. The ability to relocate will also enable a club to move from “tired” premises to more modern premises. Allowing relocation will also make it possible for a club venue to locate from a residential area to a CBD area and from a high deprivation area to a low deprivation area.

Allowing relocation also creates fairness in the event of destruction or damage to existing premises (fire, earthquake etc), lease termination, and public works acquisition.

Why Have Unique Provisions for Clubs?

Clubs provide a safe and secure gaming environment

It is appropriate to have specific provisions for clubs in the policy as these provisions will mirror the provisions in the Gambling Act 2003. Further, different provisions for pub venues and club venues are appropriate because clubs provide a very safe and secure gaming environment.

The culture that exists in clubs is one of care and protection of the club's members. Clubs are a central community facility; they provide a social focal point, and a safe and secure venue in which members can enjoy food, gaming, sports, and alcohol.

Due to the club alcohol licence requirements clubs are only permitted to serve alcohol to members, visitors with reciprocal visiting rights and guests of members who are accompanied by members. As a result the people who frequent the club become well known to staff.

Staff quickly become aware of any member that shows any problem gambling symptoms. Due to the fact that the member is known personally by the staff and management it is easy to approach the person discreetly and enquire about the person's gambling and if appropriate, offer support or exclude the person from the gaming area. Members are less inclined to be defensive when such an approach is made in a club environment as opposed to a commercial establishment where there would be little (if any) rapport with the venue's management.

Clubs are not venues which focus on family or children's activities. The average age of club members is typically in excess of 45 years.

Clubs New Zealand and its member clubs are dedicated to having in place industry leading harm minimisation measures.

The ClubCare Programme

The ClubCare problem gambling harm minimisation programme is used by clubs throughout New Zealand. The ClubCare program includes an industry leading harm minimisation training package that was developed by Clubs New Zealand.

The ClubCare programme includes:

- a. A comprehensive host responsibility policy. The policy details how to identify a potential problem gambler and what steps need to be taken when a potential problem gambler is identified;
- b. A full complement of harm minimisation and host responsibility posters. The posters include statements such as *Our staff can't ignore the signs; There is more to this Club than pokies – take a break and give it a go; What's your limit?*
- c. Club specific problem gambling brochure. The brochure is entitled *Gambling in Clubs, Looking out for each other*;
- d. A ClubCare wallet card – *Looking out for each other*

- e. A venue education inspection checklist – *What is problem gambling?*
- f. An exclusion order pad and national exclusion/self exclusion website hosted database;
- g. Gaming machine stickers that detail the free problem gambling support available;
- h. A dedicated, unique 0800 problem gambling helpline number for club members; and
- i. Host responsibility training – a compulsory harm minimisation online training course for new staff members.

Class 4 Audit Tool

Clubs New Zealand in conjunction with the Doctor Philip Townshend has also developed a class 4 audit tool to ensure that clubs are offering class 4 gambling at the highest possible standards. The audit is completed by the gambling manager at each club. The audit documentation is then sent to Clubs New Zealand where all completed audits are reviewed and assessed.

The audit:

- a. Looks at the club culture and ensures that several other entertainment activities are being offered regularly by the club as an alternative to gambling;
- b. Looks at the degree of club contributions made to non-club activities and encourages a wider community focus;
- c. Looks at the revenue streams the club receives from all its activities and the level of reliance (if any) on proceeds from gambling;
- d. Looks at the gambling environment and policies/steps that can be taken to reduce harm including:
 - i. making jackpot pay outs by cheque, or holding money for collection at a later date;
 - ii. cashless gaming systems;
 - iii. gaming room layout and design (supervised entry points, lighting, openness of the gaming areas to the bar, location of gaming room to Eftpos machines or ATMs etc.); and
 - iv. frequency of staff visits into the gaming room.
- e. Checks that all the statutory requirements regarding identifying problem gamblers, exclusion orders, signage, harm minimisation policies, and training etc. are in place; and
- f. Surveys the club's staff's knowledge and general attitude towards harm minimisation.

Supporting Evidence That Clubs Provide a Safer Environment

There is a wealth of evidence that confirms that the club environment is a safer environment to gamble than the commercial pub environment.

In 2006, Dr Philip Townshend, Research Director for the Problem Gambling Foundation, produced a paper entitled *The Case for a Reduced Levy on Gambling in Clubs compared with Gambling in Hotels*. Dr Townshend reviewed several overseas studies and came to the conclusion that the club environment is different to the commercial environment. In his paper, he noted:

... there is clear evidence from both Australian and New Zealand research that clubs provide a safer gambling environment than hotels. The gambling experience is different in clubs from that in hotels, and as these differences are reflected in the reduced risk of harm while gambling in clubs as opposed to hotels ...

The finding that clubs provide a less harmful gambling environment was also found in a study commissioned by the Victorian Gambling Research Panel prepared by the Australian Institute for Primary Care at La Trobe University Melbourne 2006. Notably this study showed found

... "that there are significant differentiations within the aggregated EGM [Electronic Gaming Machine] gambling consumption data"

This finding has been supported by New Zealand Research carried out jointly by the Problem Gambling Foundation of New Zealand and CBG Health Ltd (PGF-CBD) (2006, in print). This research indicates that though clubs operate 21% of the EGMs in New Zealand club patrons lose only 13% of the total money lost in this country.

In October 2006, a report was prepared by the Problem Gambling Foundation entitled *Host responsibility, venue type and comparative harm*. The report concluded that clubs incur less problem gambling harm than other gaming machine operators.

In 2008, the Ministry of Health engaged the Centre for Social Health Outcomes Research and Evaluation and Te Ropu Whariki ("SHORE/Whariki")¹ to conduct a survey on problem gambling. Shore and Whariki concluded that participants that played gaming machines located in clubs had far fewer negative associations than those players who played a gaming machine located in a commercial bar. The report records at page 63:

The length of time playing EGMs (electronic gaming machines) in different settings, however, had different impact on participants' domains of life. While playing EGMS in bars was associated with poorer self-ratings in regard to several life domains, playing EGMs in clubs showed only one negative association with quality of a life domain (namely, physical health).

In August 2009, Dr Philip Townshend produced a further paper entitled *Non-Casino Gambling Machines in Hotels and Clubs: Points of difference*. The paper was based on the helpline figures for problem gambler presentations. Dr Townshend concluded that club gaming machines are approximately seven times safer than hotel machines. In his paper, he noted:

... The gambling environment and gamblers' safety is demonstrably different in clubs from that in hotels ...

¹ http://research.uleth.ca/seiga/documents/SHORE&Whariki_2009_NZ.pdf

The Problem Gambling Foundation has acknowledged the very good host responsibility programmes that exist in clubs. By letter dated 1 June 2011, Graeme Ramsey, the CEO of the Problem Gambling Foundation stated:

Clubs have demonstratively shown that overall they are a safer environment than pubs. ...

Clubs are based on a collective ethos. Overall we have seen that Clubs take responsibilities to their members and guests seriously. They have worked hard on host responsibility.

A copy of the Problem Gambling Foundation letter is annexed in Schedule E.

In May 2012, Opus International Consultants Limited was engaged to produce a report on gambling venue characteristics. The Opus report² found that club players had significantly lower problem gambling severity index scores. The study recorded at page 38:

Chi square analyses suggest that non-problem gamblers were significantly more likely in the chartered club venues than the pub/bar venues and moderate risk gamblers were significantly more likely in pub/bar venues than chartered clubs.

Conclusion

It is submitted that it is appropriate for council's policy to mirror section 95 of the Gambling Act and expressly permit two clubs to merge and operate up to 30 machines at the merged site. A 30 machine site will often see a reduction in overall machine numbers, and a reduction in overall venue numbers (two 18 machine venues will go from a total of 36 machines to 30). A single dedicated venue will see greater specialisation and harm minimisation support.

It is also submitted that it is appropriate for council's policy to reflect section 96 of the Gambling Act 2003 and enable a club to relocate and retain its current number of machines. This will enable a club to relocate to modern premises in a more desirable area and prevent unfairness in the event of a fire, earthquake or public works acquisition.

Clubs provide a uniquely safe and secure gaming environment and as such it is appropriate that council's policy mirrors the legislative provisions which expressly apply to clubs.

Opportunity to Speak to Our Application

Clubs New Zealand does not wish to speak to our written submission. The contact person is:

Barry Rieper
National Operations Manager
Clubs New Zealand Inc.
PO Box 11749
Level 5, ANZAC House, 181 Willis Street
Wellington
Telephone: (04) 815 9936
Fax: (04) 499 7222
Email: gus@clubsnz.com
Website: www.clubsnz.org.nz

²

<http://www.gamblinglaw.co.nz/download/Research/Opus%20Report.pdf>

Schedule A

95. Ministerial discretion to permit more gaming machines if clubs merge

- (1) This section applies to 2 or more corporate societies that the Minister is satisfied are clubs and—
 - (a) 2 or more of which hold class 4 venue licences; and
 - (b) can each demonstrate a significant history of—
 - (i) operating as clubs for club purposes; and
 - (ii) operating the number of machines specified in any class 4 venue licences held immediately before making an application to the Minister under subsection (2); and
 - (c) can each demonstrate that they intend to merge into a single club operating at a single class 4 venue to which section 92 applies; and
 - (d) can demonstrate to the Minister's satisfaction that the proposed class 4 venue is not a commercial premises; and
 - (e) can demonstrate to the Minister's satisfaction that the merged club will have a substantial active membership; and
 - (f) have obtained a territorial authority consent for the venue, either without a condition on numbers of gaming machines or with a condition on numbers that is consistent with the number of gaming machines that it is proposed to operate at the venue.
- (2) The corporate societies may apply jointly to the Minister for approval to operate up to the number of gaming machines consented to by the territorial authority at the proposed venue.
- (3) The Minister may approve an application under subsection (2) as the Minister thinks fit, but may not consider an application before the earlier of the following dates:
 - (a) when an electronic monitoring system approved by the Secretary is operating at the proposed venue;
 - (b) 1 January 2005.
- (4) The Minister's approval must specify the number of gaming machines that may be operated, but the number—
 - (a) must not exceed the number of gaming machines specified in a territorial authority consent; and
 - (b) must not in any case exceed the lesser of—
 - (i) 30; or
 - (ii) the sum of the number of gaming machines specified in all of the corporate societies' class 4 venue licences at the time of the application.
- (5) The corporate societies may then apply jointly to the Secretary for a class 4 venue licence for the proposed venue in accordance with section 65, but the Secretary must not issue a class 4 venue licence until the corporate societies have—
 - (a) merged; and
 - (b) obtained a class 4 operator's licence.
- (6) On issue of the class 4 venue licence,—
 - (a) the Secretary must cancel the previous class 4 venue licences held by the corporate societies, and there is no right of appeal against that cancellation; and
 - (b) the Secretary must not consider an application for a class 4 venue licence for any of the venues for which the corporate societies held class 4 venue licences within 6 months after the cancellation.
- (7) The limits in subsection (4) may be reduced by regulations made under section 314(1)(a).

Schedule B

Examples of clubs who have merged and obtained Ministerial consent to host up to 30 machines

Taradale Club and Napier Cosmopolitan Club	
History of operating as a club:	TC was incorporated in 1970. NCC was incorporated in 1932.
History of operating gaming machines:	TC had operated gaming machines for more than 20 years. NCC had also operated gaming machines for more than 20 years.
Substantial active membership:	TC had a membership of approximately 2,000 members. NCC had a membership of approximately 1,500 members. It was anticipated that the merged club would have over 3,000 members.
Outcome:	Ministerial consent was granted in March 2013.

Petone Workingmen's Club and Lower Hutt RSA	
History of operating as a club:	PWMC was established in 1887. LHRSA was founded in 1926.
History of operating gaming machines:	PWMC had operated gaming machines since 2001. LHRSA had operated gaming machines since 2003.
Substantial active membership:	PWMC had a membership in excess of 10,500. LHRSA had a membership of 381. The merged club was considered to have a membership approaching 11,000.
Outcome:	Ministerial consent was granted on 4 December 2009.

Opotiki Country RSA and Opotiki Club	
History of operating as a club:	Both the RSA and the Club were formed in 1919.
History of operating gaming machines:	Both the RSA and the Club had operated gaming machines since 1994. The RSA operated 9 machines, the Club operated 6 machines. The request made was for the merged club to host 15 machines.
Substantial active membership:	The RSA had approximately 400 members. The Club had approximately 300 members. It was expected that the majority of the active members of the Club and the RSA would continue to be active members of the new merged club.
Outcome:	Ministerial consent was granted on 4 October 2007 for the merged club to host 15 machines.

Hamilton Workingmen's Club and Hamilton RSA	
History of operating as a club:	IWMC was formed in 1932. The RSA was formed in 1917.
History of operating gaming machines:	IWMC had operated gaming machines since 1996. The RSA had operated gaming machines since 1988.
Substantial active membership:	IWMC had approximately 3,000 members. The RSA had approximately 1,025 members.
Outcome:	Ministerial consent was granted on 12 December 2005.

Blenheim Workingmen's Club and Marlborough RSA	
History of operating as a club:	BWMC was formed in 1888. The RSA was formed in 1986.
History of operating gaming machines:	BWMC had operated gaming machines since 1985. The RSA had operated gaming machines since 1987.
Substantial active membership:	BWMC had a membership in excess of 4,500. The RSA had a membership in excess of 1,800. The merged club was considered to have approximately 6,300 members.
Outcome:	Ministerial consent was granted on 1 August 2005.

Upper Hutt Cosmopolitan Club and Upper Hutt RSA	
History of operating as a club:	UHCC was formed in 1961. The RSA was formed in 1931.
History of operating gaming machines:	UHCC had operated gaming machines since 1996. The RSA had operated gaming machines since 2003.
Substantial active membership:	UHCC had approximately 4,500 members. The RSA had approximately 800 members.
Outcome:	Ministerial consent was granted on 4 March 2005.

Hastings RSA and Hibernian Catholic Club	
History of operating as a club:	These two clubs received Ministerial Consent in February 2014 to operate 30 gaming machines in the Hastings RSA venue.

Paraparaumu RSA and Kapiti Club	
History of operating as a club:	The latest two clubs to merge received Ministerial Consent in September 2015 to operate 25 gaming machines in the Kapiti Club (now Club Vista) venue.

Schedule C

96. Ministerial discretion to permit more than 9 machines at certain class 4 venues

- (1) This section applies to a corporate society that the Minister is satisfied is a club that proposes to operate gaming machines at a class 4 venue and to which section 92 does not apply and that—
 - (a) holds a class 4 operator's licence; and
 - (b) can demonstrate a significant history of—
 - (i) operating as a club for club purposes; and
 - (ii) operating the number of machines specified in any class 4 venue licence held immediately before making an application to the Minister under subsection (2); and
 - (c) can demonstrate to the Minister's satisfaction that the proposed class 4 venue is not a commercial premises; and
 - (d) can demonstrate to the Minister's satisfaction that it has a substantial active membership; and
 - (e) has obtained a territorial authority consent for the venue, either without a condition on numbers of machines or with a condition on numbers that is consistent with the number of machines that it is proposed to operate at the venue.
- (2) The corporate society may apply to the Minister for approval to operate up to 18 gaming machines at the proposed venue.
- (3) The Minister may approve an application under subsection (2) as the Minister thinks fit, but may not consider an application before the earlier of the following dates:
 - (a) when an electronic monitoring system approved by the Secretary is operating at the proposed venue;
 - (b) 1 January 2005.
- (4) The Minister's approval must specify the number of gaming machines that may be operated but the number—
 - (a) must not exceed the number of gaming machines specified in the territorial authority consent; and
 - (b) must not in any case exceed 18.
- (5) The corporate society may then apply to the Secretary for a class 4 venue licence for the venue in accordance with section 65 or, if it holds a class 4 venue licence for the venue, an amendment to the licence in accordance with section 73.
- (6) The limits in subsection (4) may be reduced by regulations made under section 314(1)(a).

Schedule D

Examples of clubs who have obtained Ministerial consent to increase the number of machines hosted from 9 to 18

Club Mount Maunganui	
History of operating as a club:	The Club was incorporated on 30 January 1951.
History of operating gaming machines:	The Club operated gaming machines since 2003. The Club operated 18 gaming machines but wanted to relocate. The application was to increase the number of machines at the proposed new site from 9 to 18.
Substantial active membership:	The Club had approximately 3,000 members.
Outcome:	Ministerial consent was granted on 6 December 2010.

Hastings Returned Services' Association	
History of operating as a club:	The Club was incorporated on 9 July 1917.
History of operating gaming machines:	The Club had operated gaming machines since 1998. The Club operated 18 gaming machines but wanted to relocate. The application was to increase the number of machines at the proposed new site from 9 to 18. Although the consent was granted, it was never implemented as the RSA chose not to relocate to the new site.
Substantial active membership:	The Club had 2,400 members.
Outcome:	Ministerial consent was granted on 6 November 2008.

Palmerston North Cosmopolitan Club	
History of operating as a club:	The Club was issued a Queen's Charter in 1889.
History of operating gaming machines:	The Club operated gaming machines from 1991. The Club operated 18 gaming machines but wanted to relocate. The application was to increase the number of machines at the proposed new site from 9 to 18.
Substantial active membership:	The Club had approximately 1,000 members.
Outcome:	Ministerial consent was granted on 22 November 2005.

Schedule E

TE RÖPŪ ĀWHINA MATE PETIPETI O AOTEAROA
**Problem Gambling Foundation
 of New Zealand**



1 June 2011

Gus Rieper
 Club Sports Advisor
 Clubs New Zealand
 P.O. Box 11749
 Wellington 6142

Dear Gus,

I have recently had an opportunity to have a look at the oral submission that you have made to the Hauraki District Council.

I would like you to correct the spelling of my name if you are to quote me. In addition I would suggest that you might care to use the following quotes as opposed to relying upon your shorthand for my comments.

"Clubs have demonstratively shown that overall they are a safer environment than pubs. The Problem Gambling Foundation supports Clubs being treated differently than pubs for the purposes of the levy calculation which is based on problem gambling presentations".

"Clubs are based on a collective ethos. Overall we have seen that Clubs take responsibilities to their members and guests seriously. They have worked hard on host responsibility".

"PGF does not support any policy other than a sinking lid for Territorial Local Authorities. Given the harm that these machines do in our communities the responsible policy is to reduce the number of machines in total. If there was a choice between having machines in pubs or in clubs the Problem Gambling Foundation would choose to have these within a Clubs environment. However, our preference would be to have no machines at all".

I hope that these quotes are useful, and of course are entirely accurate.

Good luck in your future submissions!

Yours sincerely


Graeme Ramsey
 Chief Executive Officer

NATIONAL	1st Floor, 128 Khyber Pass Road, Grafton, PO Box 8021, Symonds St, Auckland 1150 Phone: (09) 368 1520 Fax: (09) 368 1540
NORTHERN	Gr Floor, 128 Khyber Pass Road, Grafton, PO Box 8021, Symonds St, Auckland 1150 Phone: (09) 368 1520 Fax: (09) 368 0590
MIDLAND	2nd Floor, 71 London Street, Hamilton, PO Box 19311, Hamilton, 3248 Phone: (07) 834 0014 Fax: (07) 834 0052
CENTRAL	3rd Floor, Community House, 64 Willis St, PO Box 11179, Wellington 6142 Phone: (04) 473 4300 Fax: (04) 473 4890
SOUTHERN	1st Floor, 329 Durham Street, Christchurch, PO Box 13094, Armagh, Christchurch 8141 Phone: (03) 379 2834 Fax: (03) 379 4384

Freephone 0800 664 262

Free & Confidential Services

Name: Ross Gisby

Organisation (if applicable): Waikato Commerce Club

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Not Answered

Comments:

We support neither policy. We believe relocation should be allowed where a club is moving premises or where two or more clubs are merging.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

Relocation should be allowed for existing clubs.

Proximity Restrictions:

We do not believe any restrictions should apply.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

It would be more desirable to have small 'pod' operations in clubs rather than new TAB venues as the clubs can monitor and restrict access.

HAMILTON CITY GAMBLING POLICIES SUBMISSION FORM – 2015
SECTION 1

Name: Peter Roach

Company / Organisation (if applicable): Northern Districts Cricket Association

Street Number & Name or PO Box: Po Box 1347

Suburb: Hamilton Town/City Post Code 3240

Phone (day): 021 990 438 Phone (evening): 021 990 438

Email: peter@ndca.co.nz

*All submissions are treated as public documents and will be loaded on to the Council's website with names and details and submitters included. If you have any questions about making a submission please phone **07 838 6537**.*

Important

Do you wish to speak about your submission at a Council hearing?

☐ Yes ☒ No

If you **do not** tick a box we will assume that you **do not wish to speak at a hearing**.

Hearings are anticipated to be held 5 November 2015. Please note if you indicated that you wish to be heard, we will contact you once hearing dates have been finalised.

SECTION 2: CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

We would like to know your preference to inform Council decision making on this issue.

1. Which relocation option do you support? (Please tick one option)

Option A (no relocation allowed/true sinking lid) ☐

Option B (restricted relocation allowed) ☒

Comments

+ Please see attached. We would prefer the status-quo.

2. Do you have any comments on the following issues as proposed in the policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. In Option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions

* See attached letter

Proximity Restrictions

* See attached letter

Other Comments

* See attached letter

SECTION 3: TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principal?

Yes ☐ No ☐

Comments

No stance

Submissions can be:

- submitted online: www.hamilton.govt.nz/gamblingreview
- posted to Freepost 172189, Strategy & Research Unit, Hamilton City Council, Private Bag 3010, Hamilton 3240
- delivered to the main reception, ground floor of the Council Building, Garden Place

Important Reminder: Submissions must reach Council by midnight on 2 October 2015. Late submissions will not be accepted.



**NORTHERN
DISTRICTS
CRICKET**

29 September 2015

Hamilton City Council
Strategy and Research Unit
Private Bag 3010
Hamilton 3240

PO Box 1347, Hamilton 3240
Seddon Park, 50 Seddon Road, Frankton, Hamilton 3204
Ph: 07-839-3783 Fax: 07-839-5542
E-mail: cricket@ndca.co.nz
Website: www.gotheknights.co.nz

Dear Sir/Madam,

Northern Districts Cricket Association (ND Cricket) writes in regard to the Gambling Policies Submission Form.

Like most sports and not-for-profit groups, ND Cricket relies heavily on the support of gaming machine trusts to deliver our services to the community. Last year ND Cricket provided cricket opportunities to over 33,000 participants in our region.

ND Cricket sees some fundamental flaws in the discussion to disallow relocation of gaming machine venues:

- (1) Hamilton has a growing population. Maintaining the same number of venues with a growing population is effectively reducing the number of venues per capita.

The simple act of not allowing additional venues is already seeing a form of sinking lid take place in our municipality.

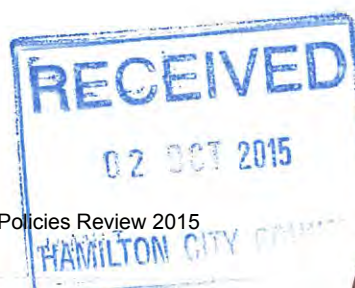
- (2) The government mandated rise in the minimum percentage of return to community from gaming trusts is rising from around 37% in 2014 to 42% by 2019.

Gaming trusts in our Hamilton municipality already play a very important part in allowing not-for-profit organisations to provide quality services for our residents. The rise by around 5% in return to community will only heighten the positive effects and opportunities for the local residents.

A challenge facing local not-for-profits is that a reduction in local gaming venues will likely see clientele simply converge on casinos where the return to the local community is far less at 5%.

- (3) A flow on effect is likely if sporting and community groups cannot access similar amounts of gaming funding going forward. Reduced opportunities will result, affecting many residents.

There are many studies that show the positive effects of sport and community events. Reduced funding simply limits these opportunities, and creates pressure-points for other areas of the community.



A reduction in physical exercise, fewer team sports, less personal interaction between residents, and a drop in community spirit could lead to a drop-off in individual health and an increase in anti-social behaviour in some areas of the community.

- (4) A drop in the availability of gaming funding could lead to an under-use of existing council resources. If sport cannot continue to hire space from Council due to financial constraints, a surplus of space may emerge, creating cost for Council without any revenue.

Put another way, sports will likely become even more reliant on Councils for their survival as they are in other parts of the world.

ND Cricket is not oblivious to the effects of gambling in the community.

However, we also understand that sport is a terrific way to help people through troubling times in their lives. The positive effect of friendship, fresh air, physical exercise, achieving goals and healthy competition has many positive benefits that flow through to the vibrant city that we presently have.

ND Cricket would support Option B over Option A, but also make the point that we cannot see fault with relocations being "within" a Gambling Permitted Area as well as "to" a Gambling Permitted Area.

Should you have any questions or concerns on this correspondence please do not hesitate to contact me.

Yours sincerely



Peter Roach
Chief Executive Officer
Northern Districts Cricket

Name: Mike Rarere

Organisation (if applicable): Te Whare o te Ata Fairfield/Chartwell Community Centre

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Secretary

Organisation (if applicable): Fairfield Endelrey Resiliency Network

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

The council must stick to a true sinking lid in order to create the supportive environments needed for the vulnerable to take ownership and curb the harm of problem gambling

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

We support the need for location restrictions and applaud the council on their current locaitons and the Enderley/Fairfield locations still being outside of permitted gambling areas as well as other high deprivation areas of Hamilton City

Proximity Restrictions:

We would advocate for an extension to 200 meters from 100 meters in terms of proximity to residential or special character zoned land and/or community facilities zoned land

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

We support the council to restrict the number of Board Venues to four as there is already adequeste access to TAB facilities that are not located on non Board Venue premisses such as class four venues, bars and taverns accross Hamilton City.

Name: Fairfield Interagency Team Network

Organisation (if applicable): Fairfield Interagency Team Network

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

The council must keep a true sinking lid policy to reduce the harm gambling has on communities

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

FIT support the council's location restrictions and note that high deprivation areas have been purposely made into gambling free zones.

Proximity Restrictions:

We welcome the proximity restrictions

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

There are enough Board venues to date and support no more than the policy has indicated being allowed within Hamilton city and agree although there are only two current Board Venues currently in operation there is more than enough access to TAB venues

Name: Cynthia Ward

Organisation (if applicable): True Colours Children's Health Trust

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

See attached submission

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No

01st October 2015

Hamilton City Council
 Strategy and Research Unit
 Private Bag 3010
 Hamilton 3240



10^{Years}
 CELEBRATING
 of support

Dear Sir/Madam

CHANGES TO GAMBLING VENUE POLICY

We are writing in regard to the proposed changes to the Gambling Venue Policy.

Like many organisations in our local community we receive monies raised from gambling venues that assist us to operate and serve the people within our city. We are concerned that the proposed changes will result in a decrease of funds available over time for distribution to the community.

As our city continues to grow there will be a decrease in the number of venues per capita, while the demand for community services will increase with the higher population. Reducing the funding pool will have a detrimental effect on a wide range of activities and services available in our local area.

True Colours is a Child's Health service that focuses on supporting seriously ill children and their families during their time of need. We work towards strengthening the family unit during difficult circumstances, supporting them when they need it the most. By doing this we hope to minimise some of the other social issues that can occur when illness exists within a family; such as relationship breakdowns, impact on mental health, stress and behavioural concerns. We provide a vital service to the Waikato region and would be concerned if reduced funding jeopardised the level of care we could provide.

We acknowledge that gambling brings with it, its own set of problems and effects on the community as well. Finding the balance between the positive and negative effects of gambling obviously isn't an easy one, but we would encourage you to look at both sides of the argument and think about some of the flow on effects that reduced funding would have on local residents and services. A strong community is built on strong families and individuals that are supported and have access to necessary resources and facilities. Gaming Trusts are a major funder for many of these things in our region.

Thank you for the opportunity to put forward our perspective on this new policy.

Yours sincerely

Cynthia Ward
 CEO/Nurse Specialist

Helping courage shine through

Name: Richard Wall

Organisation (if applicable): Waikato District Health Board

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

see attached

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

see attached



SUBMISSION ON:

Hamilton city's gambling policies review September 2015

1. Introduction

- 1.1. The Waikato District Health Board (Waikato DHB) serves a population of more than 360,270 people within 10 territorial authorities and two regional councils, stretching from the northern tip of Coromandel Peninsula to south of National Park and from Raglan and Awakino in the west to Waihi in the east. About 21% of its population lives in rural areas (NZ Census 2006).
- 1.2. The Waikato DHB has five hospitals and two continuing care facilities; community services, older persons and rehabilitation service, population health service and mental health and addiction services (collectively known as its provider arm Health Waikato). It directly employs around 6083 doctors, nurses, allied health professionals and support staff.
- 1.3. The Waikato DHB also funds and monitors (through contracts) a large number of other health and disability services that are delivered by independent providers such as GPs and practice nurses, rest homes, community laboratories, dentists, iwi health services, Pacific peoples' health services, and many other non-government organisations and agencies.
- 1.4. The Waikato DHB is extensively engaged in providing services in the region both directly through the provider wing of the organisation and indirectly through other providers. These include personal health services and public health or population based health services.
- 1.5. The following submission represents the views of Population Health Waikato DHB. It does not necessarily reflect the views of the Waikato District Health Board. Population Health provides public health services for the people living within the Waikato DHB region. Population Health is focused on providing early intervention services that improve, promote and protect the health of population groups within the Waikato DHB region. It works to help

ensure all people in the Waikato have opportunities to access services and make choices that enable them to live long and healthy lives.

2. Acknowledgement

Thank you for the opportunity to comment on the class 4 venues policy. Population Health recognises that considerable consultation and collaboration has already occurred in developing this document. Hamilton City Council's gambling policies have been reviewed by Population Health and the following comments are provided.

3. Submission

Population Health recognises that gambling behaviour is complex. Those adversely impacted by gambling are far greater than the numbers accessing services. The extent of gambling harm, its causes and solutions often evokes polarised views and debates that can make robust decision making difficult. The over-reliance on gambling industry profits also conflicts with meaningful progress in reducing harm caused by gambling.

A Social Impact Analysis was carried out in 2014-15 by the Hamilton City Gambling Minimisation Working Group of which Population Health is a member, and informs the recommendations in this submission. The report is attached as a point of reference.

- 3.1 Population Health **strongly supports** a true sinking lid policy where neither machine nor venue is replaced as surrendered.
- 3.2 Population Health **recommends** Council shows leadership by not applying for funds derived from class 4 gambling.
- 3.3 Population Health **recommends** Council not consider the inclusion of a relocation policy in its Class 4 Venues Policy.
- 3.4 Population Health **strongly supports** Council in adopting a 'no new TAB Board Venues' policy approach.

4. Submission points

4.1 Sinking lid policy

- *Pokies* are the major cause of gambling harm in New Zealand and the main gambling mode of problem gambling clients seeking help^A.
- As at June 30, 2015 Hamilton city had 30 approved venues and 457 non-casino pokie machines^B. The estimated annual spend is over \$20m^B. The estimated harm resulting from this spend is thought to impact at least 30,000 people. It is estimated that of Hamilton's adult population (18+^C);
 - 2,626 (2.5%) are either current problem or moderate gamblers,
 - 5,254 (5%) are current low-risk gamblers,
 - a further 20,000 people are negatively impacted through arguments related to gambling or went without something they needed because of money spent on gambling, and
 - 2,206 (2.1%) are thought to be lifetime probable pathological gamblers^D.
- Policies that reduce the numbers and/or density of *pokies* are likely to play a significant role in mitigating gambling related harm over time. Council has the statutory ability to influence the outcome of gambling on the community.

4.2 Funds derived from class 4 funding

- Around \$13,295,000.00 was returned to Hamilton from class 4 gambling proceeds between January 2013 and December 2014. The Lion Foundation (2008) and Grassroots Trust Ltd were the biggest donors contributing nearly \$10m to Hamilton^E.
- Hamilton City Council was a recipient of just over \$195,000 in the same period^E.
- The over-reliance on gambling industry profits conflicts with meaningful progress in reducing harm caused by gambling.

^A Ministry of Health. (2008). Problem gambling intervention services in New Zealand. 2007 service-user statistics. Wellington: MOH. Retrieved from <http://www.health.govt.nz/system/files/documents/publications/problem-gambling-intervention-2007.pdf>

^B Department of Internal Affairs. Retrieved from [http://www.dia.govt.nz/Pubforms.nsf/URL/TA_30%20June%202015.pdf/\\$file/TA_30%20June%202015.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/TA_30%20June%202015.pdf/$file/TA_30%20June%202015.pdf)

^C Approximate population of Hamilton city aged 18+. Census data 2013.

^D Abbott, M., Bellringer, M., Garrett, M., Mundy-McPherson, S. New Zealand 2012 National Gambling Study: Gambling harm and problem gambling. Gambling & Addictions Research Centre, Auckland University of Technology University. Gambling & Addictions Research Centre. Report number 2, 1 July 2014.

^E Problem Gambling Foundation. Pokie Analysis for Hamilton TA. February 2015

- Population Health urges Council to show leadership and consistency in reducing the harm caused by gambling by not applying for funds derived from class 4 gambling.

4.3 Relocation policy

- Inequality embedded into current policy or just not prevented by policy, has seen gambling venues proliferate in areas of deprivation and in proximity to Māori and Pacific peoples who reside disproportionately in these areas. In 2014, 54% of non-casino pokie machines were located in decile areas 8-10^D. The distribution of pokies by deprivation has not changed significantly since 2003^F.
- The purpose of the Gambling (Gambling Harm Reduction) Amendment Act 2013^G which amends the Gambling Act 2003 is primarily to provide local authorities with a tool to help them address the high concentration of gaming machine venues in deprived areas and address this by including new relocation provisions in their class 4 venue policies.
- All local authorities are impacted by the new legislation. At their next policy review local authorities will be required to consider whether or not they will adopt a relocation policy or remove any existing relocation policies. If a local authority adopts a relocation policy or already has one in place, the maximum number of gaming machines permitted at the new venue is the same as the number permitted at the original venue i.e. up to 18 gaming machines.
- Under the Gambling Act 2003 a statutory cap of nine machines was imposed for new venues.
- The new Amendment Act overrides this aspect of existing relocation policies under the Gambling Act 2003 by allowing up to 18 gaming machines^G.
- The prevalence of problem gambling is thought to increase with the increasing density of electronic gaming machines at a rate of 0.8 problem gamblers for each additional pokie machine. Restricting the per capita density of pokies has the potential to lead to reduced gambling opportunity and subsequent harm^H.

^F Ministry of Health. 2006. *Problem Gambling Geography of New Zealand 2005*. Wellington: Ministry of Health.

^G Gambling (Gambling Harm Reduction) Amendment Act 2013. Retrieved from <http://www.legislation.govt.nz/act/public/2013/0071/latest/whole.html>

^H Storer, J., Abbot, M., Stubbs, J. (2009). Access or adaption? A meta analysis of surveys of problem gambling prevalence in Australia and new Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies* VI.9, No 3, December 2009, 225-244.

- Local authorities can remove any existing relocation policy if they do not want their new venues to have more than nine gaming machines.

4.3 TAB Board Venues

- Hamilton city already provides adequate access to race and sports betting through its TAB agencies thereby negating the need for further board venues.

5 Contact details

Any comments on this submission or requests for further information can be addressed to:

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Determining the social impact of class 4 gambling in Hamilton city

**Prepared by Kay Kristensen
Policy Analyst, Population Health, Waikato DHB
On behalf of the Hamilton City Gambling Minimisation Working Group
September 2015**

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Summary

Gambling is big business. More than \$20 million is spent on non-casino pokies in Hamilton city each year. The estimated harm resulting from this spend is thought to impact at least 30,000 people.

Around \$13,295,000.00 was returned to Hamilton from class 4 gambling proceeds between January 2013 and December 2014. The Lion Foundation (2008) and Grassroots Trust Ltd were the biggest donors contributing nearly \$10m to Hamilton. Hamilton City Council was a recipient of just over \$195,000 in the same period.

The Hamilton City Gambling Harm Minimisation Working Group (Gambling Working Group) is a multi-agency group established in May 2014 to provide primarily, an ongoing response to the city's Social Wellbeing Strategy. The group's first priority was to determine the social impact of class 4 gambling in Hamilton and the role current gambling policies play in this.

The aim of the Social Impact Analysis was to advocate for the strongest possible alignment between local gambling policies and the city's key plans and strategies¹ to minimise the harm caused by gambling over time.

The current estimated numbers of people negatively impacted by gambling are far greater than the numbers accessing services. Problem gambling literature suggests at least 1 in 6 people in New Zealand experience some level of harm from gambling.

In Hamilton it is estimated that 2,626 (2.5%) of the city's adult population are either current problem or moderate gamblers, and 5,254 (5%) are estimated as current low-risk gamblers. A further 20,000 people are negatively impacted through arguments related to gambling or went without something they needed because of money spent on gambling. An additional 2,206 (2.1%) adults in Hamilton are thought to be lifetime probable pathological gamblers².

Gambling behaviour is complex. The extent of gambling harm, its causes and solutions often evokes polarised views and debates that can make robust decision making difficult. The over-reliance on gambling industry profits also conflicts with meaningful progress in reducing harm caused by gambling.

The Gambling Working Group offers Council a number of recommendations to consider when reviewing its gambling policies.

Recommendations are as follows.

¹ The city's key strategies and plans include Hamilton City's vision *to be a smart city in every way and in everything we do*. The Hamilton Plan, Social Wellbeing Strategy.

² Abbott, M., Bellringer, M., Garrett, M., Mundy-McPherson, S. New Zealand 2012 National Gambling Study: Gambling harm and problem gambling. Gambling & Addictions Research Centre, Auckland University of Technology University. Gambling & Addictions Research Centre. Report number 2, 1 July 2014.

Recommendation 1: Class 4 Gambling Venues Policy - Adopt a true sinking lid policy

It is recommended that Hamilton City Council adopts a true sinking lid policy where neither machine nor venue is replaced as surrendered and that Council does not consider the inclusion of a relocation policy in its Class 4 Venues Policy.

The Hamilton City Gambling Harm Minimisation Working Group recognises that the Gambling (Gambling Harm Reduction) Amendment Act 2013 makes provision for relocation. However, s97A of the Gambling Harm Reduction Act³ only applies if a territorial authority adopts a relocation policy.

Under a relocation policy, s97A(2)(b) Gambling (Gambling Harm Reduction) Amendment Act 2013, Council cannot limit the number of gaming machines to nine. Policies that restrict the numbers and/or density of *pokies* are likely to play a significant role in mitigating gambling related harm over time.

This recommendation asks council not to include a relocation clause in its current policy. A true sinking lid policy approach will ensure the strongest possible strategic alignment between the city's key plans and strategies and its gambling policies¹ to reduce gambling related harm over time.

Recommendation 2: Class 4 Gambling Venues Policy – desist applying for funds derived from class 4 gambling

It is recommended that Hamilton City Council shows leadership in preventing and minimising the harm caused by gambling by not applying for funds derived from class 4 gambling.

Pokies are the major cause of gambling harm in Hamilton. Council has the statutory ability to influence the outcome of gambling on the community.

We recognise the over-reliance on gambling industry profits to support community activities and the impact this conflict contributes to meaningful progress in reducing harm caused by gambling. However, we ask Council to show leadership and consistency in reducing the harm caused by gambling by not applying for funds derived from class 4 gambling.

Recommendation 3: TAB Board Venues Policy

It is recommended that Hamilton City Council adopts a 'no new TAB Board Venues' approach.

This policy only applies to TAB venues that are either owned or leased by the New Zealand Racing Board. Hamilton city already provides adequate access to race and sports betting through its TAB agencies thereby negating the need for further board venues.

³ NZ Legislation. Gambling (Gambling Harm Reduction) Amendment Act 2013. Retrieved from <http://www.legislation.govt.nz/act/public/2003/0051/latest/DLM5628605.html>

1 Introduction

More than \$20 million is spent in Hamilton's 30 approved class 4 gambling venues on 457 pokie machines each year⁴, and yet the social impact of this spend has never been fully realised.

The Hamilton City Gambling Harm Minimisation Working Group (Gambling Working Group) is a multi-agency group⁵ established in May 2014 to provide an ongoing response primarily to the city's Social Wellbeing Strategy; **Our Homes, Our Neighbourhoods and Our City are Safe Places** and the corresponding strategic objective '*our city reduces harm caused by alcohol, drugs, gambling, and family violence*'.

The Gambling Working Group advocates for the strongest possible alignment between the city's key plans and strategies and local gambling policies to minimise the harm caused by gambling over time.

The group's first priority was to determine the social impact of class 4 gambling in Hamilton and the role current policies play in this.

A social impact analysis of gambling in Hamilton City conducted during 2014-15 involved:

- providing an overview of gambling activity in Hamilton City
- a review of literature associated with gambling with a strong focus on research conducted in New Zealand,
- consultation with key project stakeholders and those involved in gambling to better understand the impacts of gambling, and
- recommendations to inform future policy decisions within Hamilton City.

1.1 Relevant Legislation and Policy

The following legislation and policies are considered relevant for council to consider when deciding on appropriate policy response options:

- Gambling Act 2003
- Racing Act 2003
- Local Government Act 2002
- Land Transfer Act 1952
- Companies Amendment Act 1964
- Hamilton City Operative District Plan 2012 and subsequent amendments
- Class 4 Gambling Venues Policy
- TAB Board Venues Policy

⁴ Department of Internal Affairs. Retrieved from

[http://www.dia.govt.nz/Pubforms.nsf/URL/TA_30%20June%202015.pdf/\\$file/TA_30%20June%202015.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/TA_30%20June%202015.pdf/$file/TA_30%20June%202015.pdf)

⁵ The Hamilton City Gambling Harm Minimisation Working Group comprises representation from Department of Internal Affairs, Hamilton City Council, Population Health Waikato DHB, Salvation Army, Problem Gambling Foundation, and Sky City Casino, Hamilton.

1.2 Strategic alignment

The Hamilton City Gambling Harm Minimisation Working Group project has a strategic alignment to:

- The city's vision *to be a smart city in every way and in everything we do*
- The Hamilton Plan *to build a stronger economy and a more attractive city for families and*
- Hamilton's Social Wellbeing Strategy; *our homes, our neighbourhoods and our city are safe places* and the corresponding strategic objective '*our city reduces harm caused by alcohol, drugs, gambling, and family violence*'

1.3 Assumptions and limitations

This report draws from and builds on work Population Health and key partners have undertaken or been involved with in previous gambling work. The review of literature has focused on the more recent and relevant reports, data, and legislative updates. We acknowledge that overall, gambling participation has declined but expenditure remains constant at approximately \$2b per annum. It is therefore assumed that a significant portion of the gambling population is spending more.

The judicial review involving the Problem Gambling Foundation and the Ministry of Health created a period of uncertainty for the wider problem gambling sector. Ongoing attempts from the Gambling Working Group to recruit participants (gamblers/affected others) and/or gain specific data from some of the key gambling organisations in Hamilton were largely unsuccessful. This resulted in only one qualitative interview being conducted with a gambler.

1.4 This report

This report provides an overview of gambling harm in Hamilton. It provides an opportunity to make public health progress at reducing harmful gambling activity by advocating for strong gambling policies at the local authority level. The primary audience of this report is Hamilton City Council.

2 Key findings

2.1 Overview of gambling harm in Hamilton City

- It is estimated that more than 30,000 people in Hamilton city are negatively impacted by gambling⁶. This includes estimated current moderate and problem

⁶ New Zealand 2012 National Gambling Study: Gambling harm and problem gambling. Gambling and Addictions Research Centre, Auckland University of Technology. Final Report Number 2, 1 July 2014. Abbott's research involved a randomly selected national sample of 6,251 people aged 18 years and over living in private households. Participants were interviewed face-to-face from March to October 2012. The response rate was 64% and the sample was weighted to enable generalisation to the general adult population.

gamblers, low risk gamblers, those impacted by others who gamble (table 1)^{6 7} and lifetime probable pathological gamblers.

Table 1: Hamilton city 18+ population by Problem Gambling Level

Hamilton city 18+ population (n=105,090 (approximately)) by estimated current Problem Gambling Level		
# of people	%	
735	0.7%	Problem ⁸
1,891	1.8%	Moderate ⁹
5,254	5%	Low ¹⁰
12,085	11.5%	Arguments related to gambling
8,407	8.0%	Went without something they needed/bills not being paid
28,372		Total

- A further estimated 2.1% of adults in Hamilton (2,206) are thought to be lifetime probable pathological gamblers^{11 6}.
- Māori are over represented with respect to problem gambling and experience disproportionate levels of gambling. In Hamilton, an estimated 6.2% of adult Maori are current moderate/problem gamblers⁶. It is important to note the link between socioeconomic deprivation and gambling harm and recognise the impact for Māori who disproportionately reside in these areas.
- The most popular gambling activity in Hamilton was Pub pokies followed by Club pokies, and horse & dog betting at a TAB venue in person⁶.
- \$13,295,086.27 from class 4 gambling was returned to Hamilton City between January 2013 and December 2014. The Lion Foundation (2008) and Grassroots Trust Ltd were the biggest donors contributing nearly \$10m to Hamilton in the same period¹².

⁷ Census 2013 data was used to determine the number of people aged 18 years and over in Hamilton. It must be noted that only those aged 18 years and over can legally participate in gambling.

⁸ Problem gambling is gambling that causes or may cause harm to the individual, his or her family, or the wider community. Problem gambling is most commonly associated with gaming machines. Approximately two in five regular gamblers on gaming machines experience problems with gambling. Sometimes the harm may result from just one gambling session. In other cases, it might be the result of regular gambling sessions over a period of time and involving substantial amounts of money.

⁹ Moderate-risk gamblers: experiencing some gambling-related harms and at risk for the development of more serious problems.

¹⁰ Low-risk gamblers: experiencing some gambling-related harms and at greater risk to move into the moderate-risk and problem gambling categories.

¹¹ Pathological gambling is classified as a mental disorder with similarities to drug abuse including features of tolerance, withdrawal, diminished control and relinquishing of important activities.

¹² Problem Gambling Foundation. Pokie Analysis for Hamilton TA. February 2015.

- Hamilton City Council received \$195,012.25 from class 4 gambling in the same period¹².
- One problem gambler from Hamilton interviewed for the purposes of this study provided some valuable insights into the world of class 4 gambling from a gambler's perspective. She made a number of recommendations that she believed would make a difference to current gamblers and prevent others from starting (appendix 1).

She said the physical environment of class 4 venues is very conducive to gambling in that it is warm, safe and homely. She reported to being drawn in by the music, the lights and the promise of big things to come. It is easy to gamble and easy to lose track of time.

Once she started playing the pokies she was surprised at how many of her friends and work mates also played and didn't realise how many people had a problem with it.

She said she would sometimes be sitting next to someone who might be stroking the machine, coaxing it to win or getting angry with the machine by swearing and shouting. She had not observed any host responsibility practices or follow-up for exclusion orders during the time she was playing pokies.

She thought that if the environment was more sterile and exposed with bright fluorescent lights it would not be such a good place to gamble. She also thought there were too many machines available. If a venue was full she would wait a few minutes and then move to the next venue and the next until she got fed up and went home. If there were fewer machines other gamblers would also give up and go home (A full account of this interview can be found in appendix 1).

2.2 Overview of key research literature

2.2.1 Benefits of gambling

- Gambling has long been a part of New Zealand life and for most it is an enjoyable activity. However, there is a paucity of research on the society-wide benefits of class 4 gambling in New Zealand with respect to tourism and employment.
- Charitable Gaming Trusts such as the Lion Foundation and Grassroots Trust distribute millions of dollars of gaming profits each year to sports clubs and community groups throughout New Zealand. There is no legal requirement for funds to be distributed back to the communities in which they were raised.

2.2.2 Legislation

- The Gambling Act 2003 (The Act) is the primary legislation that regulates gambling in New Zealand. Before The Act, inequality embedded in policy or simply not prevented by policy, saw the number of non-casino gaming machines and venues proliferate in areas of deprivation and with it, a corresponding increase of gambling-related harm¹³.
- The Act presents a major change in public policy related to gambling. The Act introduced a strongly regulated regime for gambling and shifted the focus of gambling to public health i.e. recognising the importance of prevention and addressing the determinants of health⁶.
- The Act defines harm as:
 - (a) means harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and
 - (b) includes personal, social, or economic harm suffered-
 - (i) by the person; or
 - (ii) the person's spouse, partner, family, whanau, or wider community; or
 - (iii) in the workplace; or
 - (iv) by society at large¹³.
- The Gambling (Gambling Harm Reduction) Amendment Act 2013 amends the Gambling Act 2003¹⁴. Primarily, the purpose of the Amendment Act is to provide local authorities with a tool to help them address the high concentration of gaming machine venues in deprived areas by including new relocation provisions in their class 4 venue policies.
- All local authorities are impacted by the new legislation. At their next policy review local authorities will be required to consider whether or not they will adopt a relocation policy or remove any existing relocation policies. If a local authority adopts a relocation policy or already has one in place, the maximum number of gaming machines permitted at the new venue is the same as the number permitted at the original venue i.e. up to 18 gaming machines.
- Under the Gambling Act 2003 a statutory cap of nine machines was imposed for new venues. The new Amendment Act overrides this aspect of existing relocation policies under the Gambling Act 2003 by allowing up to 18 gaming machines.
- Local authorities can remove any existing relocation policy if they do not want their new venues to have more than nine gaming machines¹⁵.
- The Gambling (Class 4 Net Proceeds) Amendment Regulations 2014 outlines the minimum amount of net proceeds to be distributed for authorised purposes after

¹³ The Gambling Act 2003. 4 Interpretation. Retrieved July 24, 2013 from <http://www.legislation.govt.nz/act/public/2003/0051/latest/DLM207804.html>

¹⁴ Gambling (Gambling Harm Reduction) Amendment Act 2013. Retrieved from <http://www.legislation.govt.nz/act/public/2013/0071/latest/whole.html>

¹⁵ Department of Internal Affairs. Gambling (Gambling Harm Reduction) Amendment Act: Impact of relocation provisions on existing Class 4 venue policies.

3 September 2014. These include incremental increases from 40% for the first and second financial years, 41% for the third and fourth financial years, and 42% in the fifth and all later financial years¹⁶.

2.2.3 Problem gambling

- Problem gambling has been defined as gambling that significantly interferes with a person's basic occupational, interpersonal and financial functioning. Pathological gambling is classified as a mental disorder with similarities to drug abuse including features of tolerance, withdrawal, diminished control and relinquishing of important activities¹⁷.
- While research suggests that problem gamblers are not a homogeneous group, some risk factors have been identified. Risk factors can be grouped into personal, social and environmental factors.
 - Personal factors: psychological and biological factors like personality traits and motivations.
 - Social factors: demographics like ethnicity and age and socioeconomic factors like income and deprivation.
 - Environmental factors: availability and accessibility of gambling opportunities¹⁷.

2.2.4 The gambling environment

- Gaming machines are more likely to be located in socio-economically deprived areas. The distribution of pokies by deprivation has not changed significantly since 2003¹⁸.
- Ethnicity and deprivation are significant risk factors for problem gambling. Māori have both higher gambling participation rates and higher problem gambling rates. Māori and Pacific peoples are disproportionately more likely to live in areas of deprivation and as such have greater exposure to gambling opportunities and gambling-related harm¹⁸.
- Individual gambling behaviour is associated with the neighbourhood gambling environment and in particular distance to the nearest gambling venue¹⁹.
- The prevalence of problem gambling is thought to increase with the increasing density of electronic gaming machines at a rate of 0.8 problem gamblers for each

¹⁶ NZ Legislation. Gambling (Class 4 Net Proceeds) Amendment Regulations 2014. <http://www.legislation.co.nz/regulation/public/2014/06/0264/latest/whole.html>

¹⁷ Blaszczynski A, Nower L. 2002. *A pathway model of problem and pathological gambling*. Addiction 97:487-99.

¹⁸ Ministry of Health 2006. Problem Gambling Geography of New Zealand 2005. Wellington: Ministry of Health.

¹⁹ Ministry of Health. 2008. *Raising the Odds? – gambling behaviour and neighbourhood access to gambling venues in New Zealand*. Wellington: Ministry of Health.

additional pokie machine. Restricting the per capita density of pokies has the potential to lead to reduced gambling opportunity and subsequent harm²⁰.

2.2.5 Department of Internal Affairs Mystery Shopper Research Exercise 2014

- Harm minimisation practices are low in both casinos and class 4 venues. A recent sting operation initiated by Internal Affairs in 2014 sent undercover gamblers to casinos, pubs and hotels to test whether or not patrons showing signs of potential gambling addiction to pokie machines were adequately dealt with by venue staff. Eighty-six percent of class 4 venues did not meet best practice for monitoring gambling areas²¹.
- Three class 4 venues in Hamilton were visited. Intervention was not offered in any of these venues despite undercover gamblers following pre-determined scripts of gambling addiction to pokie machines such as negative body language (head resting on hand), expressions of frustration (sighing, talking to the machine), rudeness or shortness with venue staff and/or expressing frustration verbally when interacting with staff²¹.

2.2.6 Gambling crime

- Gambling crime is predominantly monetary. A recent New Zealand study showed that 1.3% of gamblers (approximately 10,000) had committed illegal activities because of gambling. Of these, 25% would not have committed the crime had they not been gambling. The first gambling-related crime is often committed in the same year as or just a few years after starting regular gambling²².
- KPMG International's biennial Australasian Fraud Survey 2008 showed a significant increase in fraud in both Australia and New Zealand compared with their 2006 survey. Gambling fraud was one of the major findings in the 2008 survey. The executive summary states that "*gambling was the most common motivator of fraud with an average value of \$1.1 million per incident*". In 2010 the total average value of major fraud by gambling was \$175,456 (\$AUD). In 2012 frauds associated with gambling were low in number but high in average individual loss i.e. \$2,012,500 (\$AUD)²³.

²⁰ Storer, J., Abbot, M., Stubbs, J. (2009). Access or adaption? A meta analysis of surveys of problem gambling prevalence in Australia and new Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies* VI.9, No 3, December 2009, 225-244.

²¹ Department of Internal Affairs. Mystery Shopper Information Summary. Class 4 Venues. December 2014. Retrieved from http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Services-Casino-and-Non-Casino-Gaming-Mystery-Shopper-campaign

²² Bellringer, M., Abbott, M., Williams, M., & Gao, W. (2008). *Problem gambling – Pacific Islands Families longitudinal study*. Auckland: Gambling and Addictions research Centre, Auckland University of Technology, as cited in Francis Group. *Informing the 2009 Problem Gambling Needs Assessment*: Report for the Ministry of Health. 9 April 2009.

²³ KPMG. A survey of fraud, bribery and corruption in Australia & New Zealand 2012. Published February 2013. Retrieved from <http://www.kpmg.com/NZ/en/IssuesAndInsights/ArticlesPublications/Documents/Fraud-Bribery-and-Corruption-Survey-2012.pdf>

3 Conclusions

Pokies are the major cause of gambling harm in New Zealand and the main gambling mode of problem gamblers seeking help. New contributions to the academic literature suggest that the numbers of people negatively impacted by gambling are far greater than the numbers accessing services. Policies that restrict or reduce the opportunities to gamble are likely to play a significant role in mitigating gambling related harm over time. Council has the statutory ability to influence the outcomes of gambling harm on the community.

4 Recommendations

Recommendation 1: Class 4 Gambling Venues Policy - Adopt a true sinking lid policy

It is recommended that Hamilton City Council adopts a true sinking lid policy where neither machine nor venue is replaced as surrendered and that Council does not consider the inclusion of a relocation policy in its Class 4 Venues Policy.

The Hamilton City Gambling Harm Minimisation Working Group recognises that the Gambling (Gambling Harm Reduction) Amendment Act 2013 makes provision for relocation. However, s97A of the Gambling Harm Reduction Act³ only applies if a territorial authority adopts a relocation policy.

Under a relocation policy, s97A(2)(b) Gambling (Gambling Harm Reduction) Amendment Act 2013, Council cannot limit the number of gaming machines to nine. Policies that restrict the numbers and/or density of *pokies* are likely to play a significant role in mitigating gambling related harm over time.

This recommendation asks council not to include a relocation clause in its current policy. A true sinking lid policy approach will ensure the strongest possible strategic alignment between the city's key plans and strategies and its gambling policies¹ to reduce gambling related harm over time.

Recommendation 2: Class 4 Gambling Venues Policy – desist applying for funds derived from class 4 gambling

It is recommended that Hamilton City Council shows leadership in preventing and minimising the harm caused by gambling by not applying for funds derived from class 4 gambling.

Pokies are the major cause of gambling harm in Hamilton. Council has the statutory ability to influence the outcomes of gambling on the community.

We recognise the over-reliance on gambling industry profits to support community activities and the impact this conflict contributes to meaningful progress in reducing harm caused by gambling. However, we ask Council to show leadership and

consistency in reducing the harm caused by gambling by not applying for funds derived from class 4 gambling.

Recommendation 3: TAB Board Venues Policy

It is recommended that Hamilton City Council adopts a ‘no new TAB Board Venues’ approach.

This policy only applies to TAB venues that are either owned or leased by the New Zealand Racing Board. Hamilton city already provides adequate access to race and sports betting through its TAB agencies thereby negating the need for further board venues.

5 Appendices

Appendix 1

Participant 1 (P1) – Face-to-face interview, Hamilton, Thursday 16 October 2014.

Overview

- Participant 1 began gambling in 2007. No history of gambling prior to this.
- Introduced to the pokies by work supervisor. Staff went for a drink after work. Premises had pokie machines. P1 played for first time and was hooked.
- P1 described her parents as alcoholic. She was raised largely by her grandparents. Did not get a lot of guidance from her parents e.g. budgeting advice. Aunties tried to help where they could.
- P1 still living with her mother.
- Gambling overtook her life quickly.
- P1 was working 60-70hrs a week and spent all her money on the pokies. P1 prioritised time and money to gamble. She did not use a credit card but made withdrawals from her eftpos card at the venue she was gambling in at the time. Her card *declined* many times.
- P1 missed car payments, lied to creditors for why she couldn't meet payments, lied to her partner, lost her relationship, and on one occasion stole money from her mother's partner's bank account to play pokies and cover her bills. Overall, she failed in achieving her goal of buying her own home by the time she was 40 years old.
- P1 knew where all the pokie machines were in Hamilton and played in all of the venues.
- P1 described being drawn in by the music and the lights and the promise of big things to come. She described the environment as homely and safe. The venues were secluded and dark. She could smell incense burning, hot chips cooking, sports channel on the tele, people coming and going some to drink some to play pokies. Environment is comfortable, easy to gamble, easy to lose track of time. She said gamblers knew when the machines were about to pay out. The jackpot signs flash and drawn you in. When she got a win it was usually around \$900-\$1000 and she would use some of this catch up on her bills and car repayments and put the rest back into the machine.
- Once P1 started playing the pokies she was surprised at how many of her friends and work mates were also pokie players and didn't realise how many people had a problem with it. She said she would sometimes sit at a machine next to someone else who might be stroking the machine coaxing it to win or getting angry with the machine by swearing and shouting. She says she would be in a better place now if she hadn't gambled.

- P1 did make a comment about the change of smoking laws i.e. when it became illegal to smoke in a bar. She says she preferred the smoke to the body odour and smelly feet.
- It was her partner who challenged her about her gambling. At that time she was ready to listen describing herself as overwhelmed and out of control. P1 contacted Problem Gambling Foundation and started counselling. She went to a bar and self-excluded. She said she felt relief. She has relapsed once. It has taken five-years to pay off her debts. She is proud of herself and what she has achieved since she stopped gambling.

Making a difference

Reduce number of pokie machines per venue

- P1 thought there were too many pokie machines at a venue. She said if the venue was full she would wait a few minutes and then move on to the next premises and the next until she got fed up and went home. She used the analogy of queuing up for coffee. If the place looked too busy or the queue too long you would simply move on or go home. P1 said this was also her experience with pokies.

- **Recommendation 1: no more than five machines per venue.**

Change the physical environment

- The physical environment is very conducive to gambling. It is warm, safe and homely. If the environment was more sterile and exposed e.g. bright fluorescent lights it would not be such a good place to gamble. Gamblers want to be anonymous.

- **Recommendation 2: change the physical environment and make it less attractive to gamblers.**

Create more accountability with the self-exclusion process

- P1 said the self-exclusion process was too easy. There was too much choice around which premises you could self-exclude from. She also said there was insufficient follow-up.

- **Recommendation 3: A self-exclusion order should apply to all venues not just the ones the gambler wants to be excluded from.**
- **Recommendation 4: Make gambling venues more accountable by systematically checking all self-excluded orders.**

Increase advertising and promotion

- P1 believed that some of the gambling advertisements shown on television were not effective. What she personally found effective were the 'choice not chance' ads. These are real life situations that gamblers experience i.e. letting down someone they love because of their gambling.

- More pamphlets need to be available in the venues alerting and prompting people to be aware of their gambling.
 - **Recommendation 5: Continue to use real-life situations to portray gambling harm.**
 - **Recommendation 6: Ensure there is plenty of promotional material available at venues.**

Name: Faye Morgan

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Uhilamoelangi Uhila

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Gepke Bowman

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

Remove the temptation and a lot of people will be better off for it.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Kathryn Fell

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Joanne Wilson

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Michael Murphy

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Janet Andrews

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Jessica Young

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Pauliasi Manu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Maryann Manu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

We should minimize these machines into the community and encourage being gamble-free. Where a lot of families are struggling and using financial situations in a way where family, children and family orientated activities should be encouraged. This is a big problem in all society together especially for Pacific Islanders where the financial struggle is realistic in a lot of families. I completely support this. For more information please contact me.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Russell Brett

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

Freedom of choice

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No

Name: Waynos Deeos

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No

Name: Campbell Wilson

Organisation (if applicable): The Southern Trust

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

See submission attached.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

See submission attached.



Submission: Hamilton City Council Class 4 Gambling Venue Policy Review

**Prepared by: Campbell Wilson
Operations and Compliance Manager
The Southern Trust**

The Southern Trust opposes any restrictions upon class 4 gambling.

Since territorial authorities have been mandated with developing policies regarding consent to operate gaming machines, considerable emphasis has been placed on the harm caused by gambling. Many variants of policy have been introduced by different territorial authorities, some heavily geared to quell class 4 gambling in an effort to reduce harm. That approach has failed.

No reasonable person wants to see more harm caused by gambling. However, it is now clear that a small static percentage of the population will develop a gambling problem in New Zealand. Illegalising drugs has not prevented the harm caused by drug addiction in New Zealand.

I encourage any councillor who truly wishes to understand this issue to strip the issues down and complete their own research rather than just read the submissions that are presented by opposing interest groups. A great deal of information is readily available on the internet.

Reading emotional statements from those that have suffered the harmful effects of gambling does not provide a balanced or reasoned approach to the matter. We know some people are harmed by gambling; the question is whether the number of gaming machines has any correlation to that harm.

From the perspective of a class 4 operator, I see our ability to support communities being eroded, while the harm caused by gambling (all types) continues unchanged. There is no benefit in that.

It grieves me to witness this absurdity, where well-wishing people feel compelled to introduce measures that serve no benefit. As councillors you are charged with acting in the best interests of your community. Why would you continue with an approach that has provided no gain in terms of harm reduction, but has reduced the amount of funding that is available to your local non-profit organisations, the backbone of your community?

The continued availability of community funding is under serious threat.

Are you aware whether gambling expenditure at SKYCITY Hamilton has decreased in line with class 4 gambling in Hamilton since your Council has introduced a restrictive gambling venue policy? Do you know the percentage of expenditure that is returned to your community from SKYCITY Hamilton?

I'll give you a few numbers to consider. Territorial authorities were required by law to introduce class 4 venue policies by March 2004. Class 4 gambling has not generated the same level of income since that time. Expenditure on class 4 gambling has declined by 22% over eleven years. When adjusted for inflation that reduction is huge.

During the same period, expenditure on the alternate main modes of gambling increased in every case.

Gambling Mode	2004	2014	Difference	(%)
Class 4	\$1035m	\$806m	-\$229m	-22%
Casinos	\$484m	\$509m	+\$25m	+5%
NZ Racing Board	\$239m	\$311m	+\$72m	+30%
NZ Lotteries Commission	\$282	\$463m	+\$181	+64%

(Source – DIA, Gambling Expenditure Statistics)

It is notable that the modes of gambling that have experienced the largest increase in expenditure are those that can be participated on-line in the home or workplace. I consider that to be an unfavourable trend.

Only token amounts of expenditure generated by the NZ Racing Board and casinos are returned to the general population. Profits generated from those modes of gambling are saved for horse breeders and shareholders. Effectively nothing is returned to community groups.

During the period 2007 – 2014 the amount of class 4 expenditure generated in Hamilton decreased from \$7.09m to \$5.66m. That reduction is greater than the national average (from 2.89% of total expenditure to 2.69% of total expenditure). NB. DIA statistics are only provided back to 2007.

If possible, it would be useful to evaluate whether that annual loss of \$1.43m to the class 4 sector is now being spent at the local casino and whether the \$500,000 reduction in funding available to the local community has been replaced from elsewhere.

To now look at the 'harm' side of the equation. It is very difficult to obtain an accurate comparison of the harm caused by gambling (collectively) over time using 'client' data, due to changes in survey methods and sample size, client definition and degree of intervention that is captured in Ministry of Health data sets.

If asked, the Ministry of Health will state that gambling harm in New Zealand has remained relatively static over time, and certainly since the Gambling Act 2003 came into effect. Of all organisations, it should know, and being independent it has no motivation to present data in ways which support any position or funding stream.

Recently, the Ministry of Health released a paper which included a table showing interesting changes in client (problem gambler) presentations between the four main forms of gambling during the period 2004/05 to 2014/15. During that period, presentations attributed primarily to class 4 gambling declined while those attributed to the other main modes of gambling all increased.

Prob. Gambling Presentations	2004/5	2014/15	Difference	(%)
Class 4	75%	57%	-18%	-24%
Casinos	16%	22%	+6%	+38%
NZ Racing Board	7%	11%	+4%	+57%
NZ Lotteries Commission	2%	10%	8%	+400%

(Source: Strategy to Prevent and Minimise Gambling Harm 2016/17 to 2018/19: Updated levy rate tables. Table 20: Presentations attributed to the four main sectors, 2004/05 to 2014/15.)

Given that the Ministry of Health believes the overall percentage of the New Zealand population effected by problem gambling has remained unchanged in that time, problem gamblers have simply shifted to alternate modes of gambling as accessibility to/interest in class 4 machines has declined.

The problem has not improved; it is like the game 'whack a mole'.

Those people with a pre-disposition to develop a gambling problem will do so regardless. They will seek out the thrill they desire, whether it is derived from class 4 gambling, lotto, racing/ sports betting, casino betting or some other mode of gambling.

Your natural/initial response is likely to be, 'I can't alter the harm that is caused by other modes of gambling, but I can do something about this.' My response is that reducing the number of gaming machines will have no impact on the harm that is caused as problem gamblers will simply move to another mode of gambling, but it will drive down the funding available to local community organisations.

If the Council takes this approach then it must consider replacing the lost funding by other means, otherwise its community is worse off.

Unless Central Government curtails the growth of other modes of gambling (including on-line options) what sense is there in reducing one mode only? Especially when that mode provides a substantial community benefit.

Finally, if you are inclined to do so, when debating this issue please refrain from comparing class 4 operators with drug dealers. I, for one am offended by that. Operating class 4 gaming machines is a legal activity. Dealing illicit drugs is not.

Further, I wish to point out that comparisons with gambling and smoking are not accurate. People can gamble regularly without harm, smoking harms per se.

I won't present a submission in person. Your decision will not be altered by my presence and the cost of travel is better put towards other community purposes.

For your information, I have attached a list of the grants The Southern Trust has made to the Hamilton community during the 12 month period commencing 1st October 2014.

Recipient	Purpose	Date	Amount
ARTS FOR HEALTH COMMUNITY TRUST	Telephone & power costs	2/04/2015	\$1,350.00
ATHLETICS NZ	Travel&accommodation for community projects, purchase of equipment and resources	10/09/2015	\$1,450.00
AUCKLAND DISTRICT KIDNEY SOCIETY INC	Salary for Community Social Worker - L Jenkins	12/03/2015	\$1,800.00
BALLOONS OVER WAIKATO CHARITABLE TRUST	Sound & superloo hire for 2015 Balloons over Waikato Festival.	19/02/2015	\$20,000.00
BAY OF PLENTY BADMINTON ASSN INC	D/C refund of unspent donation 4/9/2014	17/11/2014	-\$283.47
BLUE LIGHT VENTURES INC HAMILTON	Bus hire & activity costs for 52 Hamilton Youth - Auckland 12 Sept	30/07/2015	\$2,956.00
BMX NEW ZEALAND INC	Airfares for Senior Mens&Womens team competing in Trans Tasman test Jan 2015	30/10/2014	\$2,565.00
BOWLS NEW ZEALAND INC	Salary & vehicle lease for Community Development Officer Midlands-S Beel	21/05/2015	\$2,500.00
CANCER SOCIETY OF NZ - WAIKATO/BAY OF PLENTY DIVISION	Sound, lighting & visual for 2015 Hamilton Relay for Life	11/12/2014	\$4,000.00
CANTEEN WAIKATO	Purchase of wall heat pump for new office & member hub	21/05/2015	\$1,433.00
CATHOLIC DIOCESE OF HAMILTON	Salary for Tongariro/Rangipo Prson Chaplain-V Perez	12/03/2015	\$1,600.00
CATHOLIC DIOCESE OF HAMILTON	Salary for Waikeria Prison Chaplain - K Hainsworth	6/08/2015	\$3,520.00
CATHOLIC FAMILY SUPPORT SERVICES	Purchase of 3 tablets to be used to measure effectiveness with clients	13/11/2014	\$600.00
CATHOLIC FAMILY SUPPORT SERVICES	Refund unspent grant 13/11/2014	27/01/2015	-\$75.65
CHRISTIANS AGAINST POVERTY	Salaries for 2 Client Setup Hamilton Caseworkers - S Bridge and L Davison	13/08/2015	\$2,500.00
CITIZENS ADVICE BUREAU HAMILTON INC	Radio advertising of Bureau Services Feb/Mar & June 2015	23/12/2014	\$1,197.00
CITY HOPE CHARITIES TRUST	Facilitators Wages for Progrms in Term3,V Oertly,V Hazelden,L James,T Witehira,H Bruce	14/05/2015	\$10,657.00
CLAUDELANDS ROVERS SPORTS CLUB INC	Playing/training balls, team bag & cones for Snr & Jnr Mens & Womens Teams	26/02/2015	\$5,000.00
COLLEGE OLD BOYS RUGBY LEAGUE CLUB CHARITABLE TRUST	Maintenance&hireage of lights, playing uniforms for U10s&ground rental	2/10/2014	\$8,000.00
COMMUNITY DEVELOPMENT TRUST	Venue&equipment hire for Matariki Community Concert in Hamilton 25 July 2015	18/06/2015	\$5,000.00
COMMUNITY LINK TRUST	Rental of facilities	16/07/2015	\$2,100.00
CYCLING NEW ZEALAND INC	Event & traffic management for Elite & U23 Road Nat Champs & Criterium Nat Champs	23/10/2014	\$2,000.00
CYCLING NEW ZEALAND INC	Event Management for 2015 Club Road & BMX National Championships	19/03/2015	\$6,100.00
DIVING NEW ZEALAND INC	Travel for divers&officials to Pacific School Games Nov&Oceania Champs Dec	3/09/2015	\$2,000.00
FAIRFIELD AMATEUR SWIMMING CLUB INC	Wages for Head Coach - K Nixon	13/11/2014	\$5,000.00
FAIRFIELD AMATEUR SWIMMING CLUB INC	Lane hire for Term 3	30/07/2015	\$5,000.00
FAIRFIELD COLLEGE	Purchase of 20 Chromebooks, 2 storage trolleys & 4 wireless access points	3/09/2015	\$10,000.00
FRANKTON RUGBY SPORTS CLUB INC	Hire of grounds for Jnr & Snr teams training & travel for Snr Team	26/02/2015	\$2,969.00
GLENVIEW UNITED AFC INC	Purchase of junior playing uniforms	23/12/2014	\$2,942.00
GYMSPORTS NEW ZEALAND	St Johns,screen&sound hire&T shirts for volunteers National Championships Akld Aug/Sept	30/07/2015	\$3,738.00
HAMILTON CHILDREN & FAMILIES TRUST	Entertainment costs for International Childrens Day March 2015	22/01/2015	\$2,000.00
HAMILTON CHRISTIAN NIGHTSHELTER TRUST	Rental of Womens Nightshelter	9/10/2014	\$5,000.00
HAMILTON CHRISTIAN NIGHTSHELTER TRUST	Rental of the Womens Nightshelter	14/05/2015	\$5,000.00
HAMILTON CHRISTMAS CHARITABLE TRUST	Installation/removal of Christmas tree & lights	17/09/2015	\$5,000.00
HAMILTON CITIZENS BAND INC	Accommodation & bus hire for 2015 National Brass Band Championships - Rotorua July	4/06/2015	\$3,000.00
HAMILTON CRICKET ASSN INC	Travel,accommodation&uniforms for snr&jnr representative tournaments&competitions Nov-Jan	9/10/2014	\$29,000.00
HAMILTON CRICKET ASSN INC	Refund of unspent donation 9/10/2014	29/05/2015	-\$34.45
HAMILTON GARDENS SUMMER FESTIVAL FOUNDATION	Lighting for Summer Festival Feb 2015	11/12/2014	\$5,000.00
HAMILTON GARDENS SUMMER FESTIVAL FOUNDATION	Volunteer costs for 2016 Hamilton Gardens Arts Festival Feb 2016	27/08/2015	\$3,000.00
HAMILTON GIRLS HIGH SCHOOL	Airfares & playing jerseys for Sevens team attending Tournament in Japan April 2015	5/03/2015	\$8,000.00
HAMILTON KOREAN BADMINTON CLUB	Coaching fees and shuttles	18/06/2015	\$730.00
HAMILTON MARIST RUGBY FOOTBALL CLUB INC	Playing/training equipment for junior rugby teams	26/02/2015	\$2,000.00
HAMILTON NORTH FOOTBALL CLUB INC	Playing uniform for new U15 team & socks for new players & replacements	26/02/2015	\$3,000.00
HAMILTON OLD BOYS CRICKET CLUB INC	Purchase of cricket balls for junior & senior teams	9/01/2015	\$8,500.00
HAMILTON OLD BOYS SQUASH CLUB	Equipment for Small Nix (5-8yrs) and Big Nix (9-12yrs) Programmes	14/05/2015	\$1,250.00
HAMILTON OPERATIC SOCIETY INC	D/C refund of unspent donation 6/3/2014	25/05/2015	-\$91.43
HAMILTON ROLLER SKATING CLUB	Construction of a Speed Track	6/11/2014	\$10,000.00

HAMILTON WEST SCHOOL	Purchase of 5 new shade sails	16/10/2014	\$5,000.00
IHC NEW ZEALAND INC HAMILTON	Purchase a Ciclofan quadricycle for members use in Hamilton/Waikato/King Country	4/12/2014	\$2,000.00
LAURA FERGUSON TRUST INC	Full refund of unspent grant 1/5/2014	30/01/2015	-\$5,000.00
LIFESTYLE TRUST	Purchase of ICT hardware & set up costs	21/05/2015	\$10,000.00
LINK HOUSE TRUST	Rental of premises & portable rooms, phone, power & inspections for Link House	30/10/2014	\$8,000.00
LINK HOUSE TRUST	Wages for Single Parent Social Worker-A Coughlan	10/09/2015	\$7,000.00
LOUISE PERKINS FOUNDATION	Salary assistance for Support Co-ordinators - Sth Akl, Greater Waikato & Rotorua	27/08/2015	\$3,500.00
MELVILLE UNITED A F C INC	Bus & mini van hire for Premier & Youth teams away games from May to Sept	23/04/2015	\$10,000.00
MIDLANDS HOCKEY INC	Accommodation costs for U21 Mens & Womens teams at the National tournament Wgnt 3-9 May	27/03/2015	\$2,000.00
MOTORSPORT NZ SCHOLARSHIP TRUST	Academy costs for Elite Motorsport Academy held in Dunedin 29 Jun - 6th July	18/06/2015	\$1,000.00
NEW ZEALAND MARIST RUGBY FOOTBALL FEDERATION INC	Field, tent & bus hire, accommodation & programme printing	26/11/2014	\$1,000.00
NO 3 DISTRICT FEDERATION OF NZ SOCCER INC	Playing uniforms, equipment & medals for Comm Dev Programs	17/09/2015	\$4,407.25
NZ PARAMEDIC EDUCATION & RESEARCH CHARITABLE TRUST	Hamilton, Whakatane, Rotorua & Taurang		
	Careers Expo costs for Auckland & Hamilton	7/05/2015	\$10,000.00
OLYMPIC WEIGHTLIFTING NEW ZEALAND	NZOC team service fee for Pacific Games & Oceania Championships in July 2015	7/05/2015	\$2,000.00
OPUS ORCHESTRA TRUST	Fees for conductor, soloist, concertmaster for July concert series Hamilton & Rotorua	18/06/2015	\$2,000.00
PACIFIC ROSE FESTIVAL TRUST	Sound equipment hire & security services for Rose Festival 13-16 Nov	2/10/2014	\$3,809.00
PACIFIC ROSE FESTIVAL TRUST	Sound equipment hire & security services for Rose Festival Nov 2015	27/08/2015	\$4,000.00
PARENT TO PARENT WAIKATO	Purchase of office equipment & furniture	27/03/2015	\$906.00
PARENT TO PARENT WAIKATO	D/C refund of unspent donation 27/3/2015	19/08/2015	-\$90.79
PARKINSONISM SOCIETY OF NZ INC WAIKATO BRANCH	Salaries for Nth & Sth Community Educators-M Taylor & J Mair	10/09/2015	\$4,000.00
RAPE & SEXUAL ABUSE HEALING CENTRE INC	Rental of premises	3/09/2015	\$5,000.00
RIVERLEA THEATRE & ARTS CENTRE INC	Towards renewing Theatre air conditioning & ducting system	11/12/2014	\$5,000.00
RIVERSIDE GOLF CLUB INC	Purchase of a greens mower	9/10/2014	\$5,000.00
RIVERSIDE GOLF CLUB INC	Switchboard upgrade & electrical work for Lochiel Golf Course Clubrooms	27/08/2015	\$5,000.00
ROYAL NZ PLUNKET SOCIETY HAMILTON BRANCH	Rental of premises, equipment lease costs & ground maintenance for the Plunket Rooms	24/09/2015	\$2,271.00
RYDER CHESHIRE FOUNDATION WAIKATO CHARITABLE TRUST	Toward curtains & blinds and appliances for two new homes for the disabled.	12/03/2015	\$3,000.00
SACRED HEART GIRLS COLLEGE	Purchase of new rowing eight boat	21/05/2015	\$5,000.00
SCOUT ASSOCIATION OF NEW ZEALAND	Salary for RDM - R Robilliard, car lease, paper/printing, phone & internet	19/02/2015	\$5,000.00
SIR EDMUND HILLARY OUTDOOR PURSUITS CENTRE OF NZ	Salary assistance for Centre Manager-G Parkin & Programme Manager-R Miller	21/05/2015	\$2,500.00
SQUASH WAIKATO INC	Accommodation & travel for Jnr & Snr teams for Squash Nationals Aug & Oct 2015	4/06/2015	\$6,045.00
SRI LANKA FRIENDSHIP SOCIETY WAIKATO INC	Venue hire & printing of booklet for Sri Lankan New Year Cultural Show April 2015	9/01/2015	\$5,400.00
ST PETERS TENNIS CLUB INC	Junior coaching for 8 weeks from February 2015	23/12/2014	\$2,000.00
STAGE CHALLENGE FOUNDATION	Vehicle hire for Nationwide events May-July	27/03/2015	\$756.00
STARJAM CHARITABLE TRUST	3 months rental of the Hamilton Office	16/10/2014	\$1,248.00
STORYTIME FOUNDATION TRUST	Books for high needs babies/families in Sth Auckland, Waikato & Hamilton	23/07/2015	\$5,000.00
SWIM WAIKATO INC	Sportsforce Swimming Development Officer contract fee April	22/01/2015	\$2,500.00
TANES TREE TRUST	Printing costs for book on Kauri physiology, ecology and management	21/05/2015	\$2,722.00
TE RAPA BADMINTON CLUB INC	Refund of unspent grant 17/4/2014	23/01/2015	-\$646.91
TE RAPA SCHOOL	Purchase 8x Apple iPad4's, to add to classroom set, for full-school use.	2/10/2014	\$3,760.00
TE RAPA SCHOOL	Accommodation & instructor fees for Snr Outdoor Education camp Nov 2-6	17/09/2015	\$10,000.00
THE BYM TRUST	Accommodation for youth workers training weekend in Rotorua June 2015	26/02/2015	\$1,000.00
THE FLAGSTAFF CLUB INC	Playing jerseys for 2015 junior & senior teams	30/10/2014	\$5,000.00
THE FLAGSTAFF CLUB INC	Playing jerseys for extra junior rugby teams for the 2015 season	28/05/2015	\$5,000.00
TOKU MAPIHI MAUREA KURA KAUPAPA MAORI	Construction of a junior playground	23/12/2014	\$6,000.00
TOUCH NEW ZEALAND INC	Contract fee for Coaching Services - P Walters	29/01/2015	\$2,000.00
UPPER CENTRAL ZONE OF NZRL INC	Equipment for Schools & Comm Progrms, accomm, training bibs, venue hire, storage shelving & signs	23/04/2015	\$5,000.00
UPPER CENTRAL ZONE OF NZRL INC	Transport, training ground hire & purchase of warm up jackets for players.	30/07/2015	\$3,000.00
WAIKATO AGRICULTURAL & PASTORAL ASSN	Update & installation of banner & ambulance for 2015 Show & purchase of colour photocopier	28/05/2015	\$3,500.00

WAIKATO BADMINTON ASSN INC	Purchase of shuttles for training, tournaments & events	26/02/2015	\$5,000.00
WAIKATO BASKETBALL COUNCIL INC	Wages for Referees & Floor Controllers for League & Miniball Competitions Nov/Dec	30/10/2014	\$4,000.00
WAIKATO BASKETBALL COUNCIL INC	Travel&accommodation for U19 Boys & Girls representative teams to NZBB Champs Nlsn July	28/05/2015	\$10,000.00
WAIKATO BRANCH OF RNZ SPCA	Veterinary costs for October 2014	2/10/2014	\$5,000.00
WAIKATO COMBINED EQUESTRIAN GROUP	Wages for Riding School Instructor/Yard person-R Steiner	29/01/2015	\$3,000.00
WAIKATO COMMUNITY HOSPICE FOUNDATION	Stage two of the construction of new facility	18/12/2014	\$5,000.00
WAIKATO CONTRACT BRIDGE CLUB INC	Purchase of a dealing machine	5/03/2015	\$4,000.00
WAIKATO FAMILY CENTRE TRUST	Wages for Karitanes - J Pollock, & I Haliday	2/10/2014	\$5,000.00
WAIKATO FAMILY CENTRE TRUST	Wages for Karitane Nurses-J Pollock & I Haliday	13/08/2015	\$12,500.00
WAIKATO INSTITUTE FOR LEISURE & SPORT	Venue hire,polo shirts,workbooks&certificates for Academy programmes in Hamilton&Rotorua	30/04/2015	\$2,000.00
WAIKATO ORCHESTRAL SOCIETY INC	Hire of rehearsal/venue & storage facilities 2015	22/01/2015	\$5,000.00
WAIKATO REGION BMX ASSN INC	Purchase of presentation plates for 2015 Waikato Region BMX Champs 10-11 Oct	24/09/2015	\$1,500.00
WAIKATO ROWING CLUB INC	Purchase of indoor rowing machines	25/06/2015	\$5,250.00
WAIKATO SOCIETY OF ARTS INC	Wages for Art School Tutors terms 3&4	9/07/2015	\$5,000.00
WAIKATO UNICOL ASSOCIATION FOOTBALL CLUB INC	Coaching fees for Mens A Team-D Harrison, Premier Coach-H Jones,June-Sept & field hire	16/04/2015	\$3,800.00
WAIKATO UNIVERSITY RUGBY CLUB INC	Teams travel, coaching, medical equipment & field hire for 2015 season.	16/04/2015	\$10,000.00
WAIKATO/BAY OF PLENTY AREA JUDO ASSN INC	Venue & mat hire,medical services&bus hire for Open Championships&Nat Training Camp	7/05/2015	\$2,000.00
WANDERERS SPORTS CLUB INC HAMILTON	Bus travel costs for Northern League Premier team travel March - May 2015	29/01/2015	\$5,000.00
			\$483,608.55

Name: Anish Chand

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Glenise Bevan

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Charlotte Sagow

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

Gambling is fun but addictive and for heaven's sake, please stop the Casino's 24 hour opening. Start being ratbags, be a responsible council!

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Arnya Strother

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Cam Strother

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Jenni de Wild

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Angela Field

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Diane

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Jan Robertson

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No

Name: Shayne R

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Patali Taufui

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Kavauhi Tuipulotu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Taiamoni Tuipulotu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Vaka Tuipulotu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Fusi Tuipulotu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Melemoti Tuipulotu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Palei Molitika

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Elisepa Vahai

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Darsha Tuanaki

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: David Latu

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Toakase Mahoni

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Helen Manukia

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Sarah Tuhakaraina

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Keith Vincent

Organisation (if applicable): Waikato Valley Cricket Association

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

Comments:

We would support Option B

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Other Comments:

Hamilton has a growing population, by maintaining the same or having less venues as proposed. it is effectively reducing the number of venues by population base

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

No

Comments:

We are happy with the current policy that Hamilton city shall maintain a limit on the total number of board venues of not more than 1 board venue per 30,000 population.



1 October 2015

Hamilton City Council
Strategy and Research Unit
Private Bag 3010
Hamilton 3240

Dear Sir/Madam

Waikato Valley Cricket Association (WVCA) writes in regard to the Gambling Policies Review.

We as an association disagree with the approach of disallowing relocation of gaming machine venues. Like many not for profit groups, WVCA rely heavily on the support of gaming machine trusts to help deliver cricket programmes to our community.

WVCA main concern with the relocation approach (less venues operating) is the adverse effect it will have on sporting and not for profit organisations. The accessibility of gaming funding will decrease and become more competitive for these groups to apply for. WVCA feel this will lead to further reduced opportunities to participate in organised events to the community. WVCA feel that sport is a great way of providing positive benefits to the community through physical exercise, friendship and competition.

WVCA does not benefit from the proceeds from gaming machine trusts in Hamilton, however we feel that not for profit groups and sporting bodies based in Hamilton will be disadvantaged due to this approach.

Yours sincerely

Keith Vincent
Secretary
Waikato Valley Cricket Association

Name: Fatai Uhila

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Mesui Tau'aika

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Naite F Tau'aika

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Pelenatita Finau

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Lance Kendrick

Organisation (if applicable): Social & Ecumenical Action Group, Parish Council of St Andrew's Presbyterian Church Hamilton

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

A "true sinking lid", as in Option A, will best assist with reducing harm from Class 4 gaming machines. Your very good "Statement of Proposal" document, released in conjunction with this public consultation process, captures many of the issues around problem gambling and its impact on people, families, and community stability. Problem gamblers increase the requirements for expensive social services, and the latter are not always effective in overcoming people's dysfunction. We say that most of all it is people we need to care about.

As your Proposal document points out, the ease of access to gambling facilities enhances risk. The location and number of venues is part of this bigger picture. In relation to Class 4 gaming machines, it is the "continuous play" aspect of the gambling which is most dangerous – unlike, say, lottery tickets or housie. Pokie machines are designed to be addictive and take advantage of the way the human brain is wired.

Your Proposal document points out (page 9) that it can be said that there is a positive from pokies, in that gaming trusts give grants to clubs and charities. However, for every \$1 distributed to charity from pokies, something like three times more has been lost by punters. The "largesse" of the gaming trusts has been extracted from the vulnerable - and that price is too high. There can be no "win-win" with pokies.

In both Option A and Option B the draft "Class 4 Gambling Venue Policy" states that the Purpose is:

1. To control the growth of Class 4 gambling venues.
2. To minimise the harm caused by Class 4 gambling.

If it is within the scope of this consultation we suggest to Council that the first clause of the "Purpose" should be changed to say, more clearly:

1. To prevent the growth of Class 4 gambling venues and to reduce their number over time.

Note that in Option A, sections 4.a. and 4.b. need to be linking with the word "or".

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

We support these.

Proximity Restrictions:

We support these.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Kate Muggeridge

Organisation (if applicable): Grassroots Trust

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

Grassroots Trust suggests that Council allow relocation within a Gambling Permitted Area as well as to a Gambling Permitted Area.

See attached

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Not Answered



SUBMISSION TO HAMILTON CITY COUNCIL
IN RESPONSE TO THE
PROPOSED GAMBLING VENUE POLICY

OCTOBER 2015

ADDRESS FOR CONTACT:

Grassroots Trust

PO Box 9019, Hamilton | 0800 957 960

Grassroots Trust wishes to take the opportunity to make a supporting presentation of our submission on the proposed gambling venue policy.

INTRODUCTION

This submission to Hamilton City Council provides an overview of Grassroots Trust and outlines our response to the proposed Gambling Venue Policy 2015.

Grassroots Trust Limited is a Class 4 Gaming Trust licensed under the Gambling Act 2003 that generates funding for the community through the supply and operation of gaming machines in bars and pubs. Based in Hamilton, Grassroots Trust is one of the primary gaming trusts within the region and currently operates 27 venues across the Waikato, Bay of Plenty, Auckland, Taranaki and Thames regions.

Many organisations throughout New Zealand and in particular, the Hamilton City region have benefited from a Grassroots Trust grant. In the year ended March 2015, Grassroots Trust distributed \$7,254,440.00 to various sport, education and community groups. This represents over 42.39% of Gaming Proceeds returned to the community.

It is Grassroots Trust's intention to distribute funds back to the community that it was generated across the sport, community and education sectors.

The Grassroots Trust Board of Directors are responsible for assessing the grant applications individually. The Grassroots Trust Limited Board of Directors are Chairman, Martin Bradley (Lawyer); and Directors, Kevin Burgess (Pharmacist); Craig Sanders (Accountant); Jeff Freeman (Principal); Jeremy O'Rourke (Managing Director); and Tracey Gunn (Barrister).

Grassroots Trust is supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused from gaming; however does not support Council's intent to remove the current relocation policy which will in turn introduce a full sinking lid policy (Option A). A sinking lid policy is unlikely to have any effect on the number of problem gamblers in the area, but highly likely to result in a reduction in funding to sport, education and community groups which we are proud to be able to support.

Grassroots Trust also does not fully agree with Council's intent to only relocate existing venues located outside of the Gambling Permitted Area to within a Gambling Permitted Area (Option B) and suggest that Council also allow relocation within a Gambling Permitted Area as well as to a Gambling Permitted Area.

RATIONALE

In principle, Grassroots Trust does not support the Proposed Class 4 Gambling Venue Policy which proposes changes to the relocation policy which will eventually reduce the number of class 4 venues and machines throughout the district.

We outline our reasons not to support the proposed changes to the Class 4 Gambling Venue Policy below:

1. Reduction Of Funds To Sport, Community & Education Groups

Grassroots Trust currently has 8 venues situated in Hamilton City which generate funds for the Hamilton City region:

- Yardhouse
- Homestead Bar and Eatery
- Bar 101
- Smokey's Pool And Gaming Lounge
- Smith & McKenzie Chophouse
- The Cook Café & Bar
- The Dinsdale Office
- The Riv

Each month, Grassroots Trust approves many grant applications for various organisations. Our recipients in Hamilton City for the year end March 2015 is included with this submission. In this financial year, we were able to support many smaller Hamilton City organisations as well as large community organisations and key community events including:

- Hamilton City Council
- Balloons Over Waikato Charitable Trust
- Child Matters
- Hamilton City Christmas Parade Charitable Trust
- Waikato Community Hospice
- Netball Waikato Bay of Plenty Zone
- Waikato Youth Empowerment Trust
- Home of Cycling Velodrome Project
- Hamilton Gardens Arts Festival
- True Colours Charitable Trust
- The Order of St John – Central Region Trust and Hamilton Area Committee
- Alzheimers Waikato Charitable Trust
- Sport Waikato Education Trust
- Swim Waikato Inc.

Grassroots Trust estimates that if one Hamilton venue with 18 gaming machines and an average weekly Gaming Machine Proceeds (GMP) of \$17,308.80¹ (based on current Department of Internal Affairs statistics) were to close and not replaced with another venue, there would be an approx. loss of \$313,063.51 (based on the required 40% return to community) per annum in funds to be contributed back to the local community, sports and education groups. There would also be an approx. loss of \$180,011.52 per annum in gaming duty to the government.

¹ Gaming Machine Proceeds by District and Society, Department of Internal Affairs, April-June 2015, www.dia.govt.nz

Current statistics from the Department of Internal Affairs shows that the number of venues within Hamilton City since 2010 has decreased by 3 and a reduction of gaming machine proceeds of approx. \$1,100,487.75². This represents an approximate total of \$382,778.35 (based on 40% RTC) reduction of funds available to the Hamilton City community so far based on the current average machine banking in Hamilton.

In 2014, Grassroots Trust was able to relocate the Class 4 18 machine venue licence from one Hamilton City venue situated in a Gambling Permitted Area to another venue located in the same area. This venue generates approx. \$23,000 a month or \$276,000 per annum (based on 40% RTC) to return to the Hamilton City community. This funding would have been lost under both of Council's proposed options to amend the current relocation policy.

Grassroots Trust is just one of the class 4 gaming trusts whom distribute funds to the Hamilton City community. Changes in the relocation policy will not only reduce funding from Grassroots Trust, but all class 4 gaming trusts.

Any changes in the Class 4 Gambling Policy may also drive gamblers to Casinos whom only return 5% to the community which in turn, will further reduce the amount of funds contributed to the community.

2. Problem Gambling In Perspective

Grassroots Trust supports any measures that prevent harm caused by gaming machines however believes that a sinking lid approach is not likely to have an effect on problem gambling. There has never been a question that problem gambling is an issue for those that it affects and those around them; however we must put the issue of problem gambling in perspective.

New Zealand has almost the lowest rate of problem gambling prevalence in the western world – even the Ministry of Health ranks problem gambling as one of the least prevalent mental health issues affecting New Zealanders, reporting³:

- That between 98.2% and 99.7% of adults are not engaged in problem gambling;
- 99.5% of New Zealanders did not seek help for problem gambling issues last year, and
- Of those who played gaming machines 99.78% did not seek help.

All machines are fitted with PID's (Player Information Displays) these displays interrupt the player every 25-30 minutes of continuous play and advise the player how much they have spent and lost, and how long they have been playing for.

The current Ministry of Health "Preventing and Minimising Gambling Harm Six Year Strategic Plan (2010/11-2015/16)" has a range of objectives and actions to support the reduction of problem gambling and harm from gambling and includes the capture of data and trend analysis. We believe that these strategies need time to provide good data and strategic solutions to the problem gambling issue to see whether they are having a beneficial impact.

² Summary of Expenditure by Territorial Authority/District, Department of Internal Affairs, June 2010-June 2015. www.dia.govt.nz

³ Problem Gambling in New Zealand, Ministry of Health, August 2012, www.health.govt.nz

A sinking lid policy in Hamilton is unlikely to have any effect on the number of problem gamblers in the city. By reducing the number of class 4 gaming venues, may actually drive gamblers away from the controlled environment of a gaming lounge, to an uncontrolled environment of online gambling which cannot be monitored at all; or other forms of gambling (TAB, Lotto, Casino).

3. Problem Gambling Support & Systems

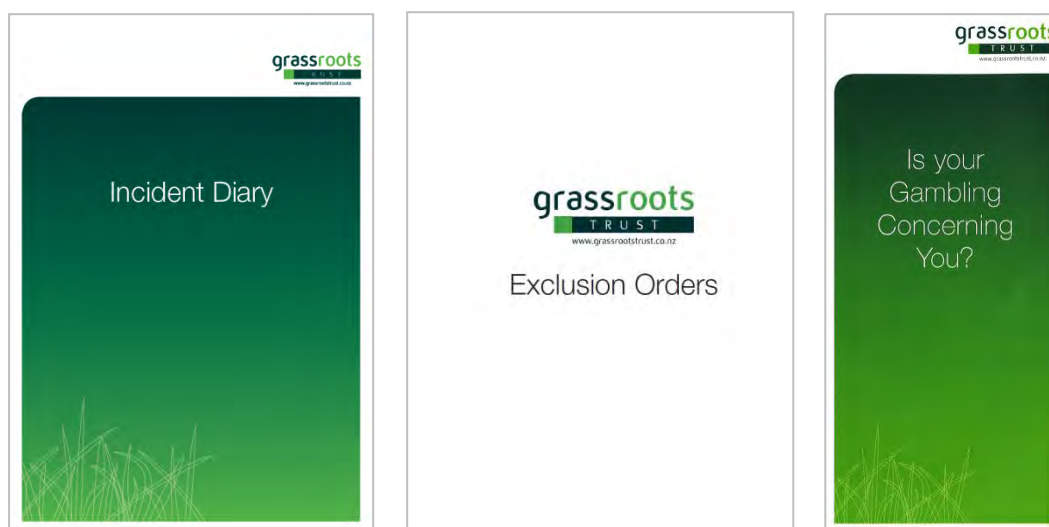
Grassroots Trust and our venues understand the harmful effects of Problem Gambling and that problem gambling has a social, economic and health impact on individuals, their families and their work place.

There is already a regulatory requirement for staff and managers of Class 4 gaming venues to be trained in how to recognise problem gamblers and how to intervene appropriately to ensure that they seek help and support for their problem. This, in our view, is the most effective way of helping the very small proportion of people who have a problem to manage that, whilst leaving the greatest proportion of people to fulfil their legitimate desire to gamble responsibly.

Grassroots Trust provides significant funding to the Ministry of Health through an annual levy (\$251,963.00 in the year end March 2015). This funding helps problem gambling providers in Hamilton, including the Problem Gambling Foundation, the Salvation Army Oasis Centre and Gambling Helpline.

Grassroots Trust provides significant on-going training to venues on how to identify and support problem gamblers. We also provide the following resources to venues:

- Grassroots Trust Harm Minimisation Policy
- Quick Reference Guides to help identify problem gamblers
- Harm Minimisation Incident Diary to record any problem gambling issues
- Problem Gambling pamphlets
- Valued Customer Letter with information for problem gamblers
- Exclusion orders and an exclusion order process
- Signage to display in and around the gaming room



Venue resources to assist with problem gambling provided by Grassroots Trust

Grassroots Trust's venues also partake in the multi-venue exclusion (MVE) program which currently operates across all Class 4 and casino venues in Hamilton which provides Problem Gamblers with the option to exclude themselves from other venues within city boundaries. Problem Gambling Foundation currently administers this program in Hamilton.

Grassroots Trust believes the most effective way to identify and treat problem gambling is by human interaction. We are focusing on delivering better systems at a venue level to ensure we identify any persons who may be having difficulty with gambling.

4. Gaming Machine Gambling as an Entertainment Option

The hospitality industry is a key component to the economic development of Hamilton City and a reduction in class 4 venues and gaming machines could have an impact on the variety of entertainment options within the industry available to local residents and tourists to Hamilton City.

We recognise that 'playing the pokies' is indeed a form of entertainment for many people. Not all players are problem gamblers, current research shows that between 98.2% and 99.7% of adults are not engaged in problem gambling⁴.

Recent documentation from the Ministry of Health also identifies that gambling can be a harmless entertainment activity from which people derive personal enjoyment and positive social effects. For example, a Department of Internal Affairs survey, People's Participation in, and Attitudes to, Gambling, 1985-2005 found, in the 2005 study, that 60% of participants said they gambled on class 4 gaming machines as a form of entertainment, and 16% as a way to be with people or to get out of the house⁵.

RECOMMENDATION

Grassroots Trust supports Option B of the Statement of Proposal which allows relocation however recommends Council allow relocations within a Gambling Permitted Area as well as to a Gambling Permitted Area.

⁴ Problem Gambling in New Zealand, Ministry of Health, August 2012, www.health.govt.nz

⁵ Problem Gambling Resource of Local Government, Ministry of Health, 2010, www.health.govt.nz

GRANT RECIPIENTS – HAMILTON CITY**Grassroots Trust & Grassroots Trust Limited****1 April 2014 – 31 March 2015****Grant Total: \$4,387,905.58**

Recipient	Amount
ACE Swimming Club Inc	\$8,837.80
Alzheimers Waikato Charitable Trust	\$15,000.00
Athletics - Waikato Bay of Plenty Inc	\$15,000.00
Balloons Over Waikato Charitable Trust	\$20,000.00
Cambridge Road Community Kindergarten	\$500.85
Career Moves Trust	\$15,000.00
Catholic Family Support Services	\$3,000.00
Child Matters	\$88,124.99
Claudlands Rovers Football Club	\$9,332.64
Decision Reachout Toro Mai Trust	\$4,551.84
Diabetes New Zealand Inc Waikato Branch	\$3,000.00
Dynamo Cycling & Sports Club	\$125,716.50
Eastlink Tennis Trust	\$14,000.00
Eastside Boxing Club Inc	\$10,352.71
Fairfield Amateur Swim	\$5,000.00
Fairfield Primary School	\$864.35
Fitness Action Charitable Trust	\$1,510.00
Frankton Rugby Sports Club Incorporated	\$10,000.00
Fraser Tech Netball Club Inc	\$20,993.00
Fraser Tech RFC Inc	\$85,283.45
Hamilton Boys High School	\$100,000.00
Hamilton Christian Nightshelter Trust	\$3,000.00
Hamilton City Christmas Parade Charitable Trust	\$10,000.00
Hamilton City Council	\$35,222.25
Hamilton City Netball Centre	\$50,000.00
Hamilton Cricket Assn Inc	\$10,000.00
Hamilton Gardens Summer Festival Foundation	\$50,000.00
Hamilton Girls High School	\$15,630.00
Hamilton Hawks Wrestling Club	\$5,000.00
Hamilton Inline Hockey Club Inc	\$3,000.00
Hamilton Marist RFC	\$110,502.91
Hamilton Old Boys Junior Rugby Club	\$5,000.00
Hamilton Old Boys Rugby and Sports Club Inc	\$55,119.00
Hamilton Squash & Tennis Club Inc	\$15,000.00
Hamilton Star University Cricket Club	\$10,000.00
Hamilton West School	\$3,000.00
Hillcrest Amateur Swim Club Inc	\$5,000.00
Hukanui Primary School	\$4,000.00

Knighton Normal School	\$36,600.00
Marian School - Hamilton	\$800.00
Matangi Hillcrest Sports Club	\$16,590.71
Melville AFC	\$19,000.00
Melville Cricket Club	\$10,000.00
Melville High School	\$2,000.00
Melville Rugby Sports Club	\$60,325.08
Midlands Hockey Inc	\$10,000.00
MS Waikato Trust	\$2,000.00
N Z Water Ski Racing Assn Inc	\$30,000.00
Nawton Primary School	\$19,800.00
Netball Waikato Bay of Plenty Zone	\$184,500.00
New Zealand Billiards & Snooker Association Inc	\$10,434.78
Newstead Model Country School	\$876.00
Northern Districts Cricket Assn	\$200,000.00
Pukete School	\$5,000.00
Riverlea Theatre and Arts Centre Inc	\$1,840.29
Sport Waikato Education Trust	\$59,500.00
St Johns College - Hamilton	\$10,000.00
St Josephs Catholic School Fairfield Parent Teacher & Friends	\$5,000.00
St Marys Scout Group	\$5,256.00
Stroke Foundation - Hamilton	\$5,750.00
Swim Waikato Inc	\$14,776.11
Tainui Waka Rugby Incorporated	\$18,398.52
Te Awa River Ride Charitable Trust	\$50,000.00
Te Kowhai School	\$2,000.00
Te Rapa Primary School	\$3,000.00
Te Rapa Rugby Sports Club Inc	\$10,000.00
Te Whakaruruhau Inc	\$28,231.39
The Adastra Foundation	\$30,000.00
The Flagstaff Club Inc	\$51,750.00
The Home of Cycling Charitable Trust	\$50,000.00
The Order of St John Central Region Trust	\$8,990.00
The Order of St John Hamilton Area Committee	\$50,000.00
The Tron Music Trust	\$12,000.00
True Colours Charitable Trust	\$105,735.00
U Leisure Ltd	\$12,000.00
Vardon School	\$2,739.13
Waikato Badminton Assn Inc	\$20,000.00
Waikato Community Hospice Foundation	\$250,000.00
Waikato Community Hospice Trust	\$71,840.00
Waikato Diocesan School Rowing Club Inc	\$10,000.00
Waikato Institute for Leisure & Sports Studies	\$1,500.00
Waikato Medical Research Foundation Inc	\$51,009.00
Waikato Paraplegic & Physically Disabled Assn Inc	\$2,000.00
Waikato Regional Volleyball Assn Inc	\$2,000.00

Waikato Rugby Referees Association	\$15,390.00
Waikato Rugby Union	\$1,687,740.08
Waikato Society of Arts Inc	\$3,000.00
Waikato Touch Assn	\$10,000.00
Waikato University Rugby Football Club Inc	\$40,000.00
Waikato Valley Cricket Assn Inc	\$15,000.00
Waikato Water Polo Club	\$3,000.00
Waikato Youth Empowerment Trust	\$65,000.00
Wanderers Sports Club Inc	\$24,991.20
Wanderers Sports Club Inc	\$10,000.00
Warriors Hockey Club Inc	\$8,000.00
Western Community Assn	\$5,000.00
Woodstock Primary School	\$2,000.00

Name: Kate Muggeridge

Organisation (if applicable): Trillian Trust

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option B - restricted relocation allowed

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

Trillian Trust recommends Council allow relocations within a Gambling Permitted Area as well as to a Gambling Permitted Area.

See attached

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Not Answered



SUBMISSION TO HAMILTON CITY COUNCIL
IN RESPONSE TO THE
PROPOSED GAMBLING VENUE POLICY

OCTOBER 2015

ADDRESS FOR CONTACT:

Trillian Trust

PO Box 12 245, Auckland | 09 579 1428

INTRODUCTION

This submission to Hamilton District Council provides an overview of Trillian Trust and outlines our response to the Statement of Proposal – Draft Class 4 Gambling Venue Policy.

Trillian Trust (TRL) is a New Zealand based Charitable Trust, incorporated in May 1999 under the Charitable Trusts Act 1957.

The Trust was formed to provide support to New Zealand based charitable and not-for-profit organisations through grants for specific purposes that benefit the community. As a Charitable Trust, Trillian has no shareholders, directors or owners. The benefactors of the Trust are the charitable and not-for-profit organisations that receive grants from the Trust.

To generate the necessary funds the Trust obtained a licence to operate gaming machines to licensed venues across New Zealand in 1999. The operator's licence allows Trillian Trust to distribute the net proceeds from the gaming operation to Authorised Purposes.

Since that time, the Trust has provided over \$50 million in grants to thousands of community organisations. In the year end July 2015, Trillian Trust distributed \$11,725,755 in net proceeds to various community groups. This represents over 40% of gaming proceeds returned to the community.

Trillian Trust is governed by a Board of Trustees; the current members are:

- John Harpin, Chairman
- Stanley Malcolm, Secretary/Treasurer
- Dean Agnew, Trustee and Chief Executive Officer
- Kevin McDonald, Trustee
- Brett Kilburn, Trustee

Trillian Trust is supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused from gaming; however does not support Council's intent to remove the current relocation policy which will in turn introduce a full sinking lid policy (Option A). A sinking lid policy is unlikely to have any effect on the number of problem gamblers in the area, but highly likely to result in a reduction in funding to sport, education and community groups which we are proud to be able to support.

Trillian Trust also does not fully agree with Council's intent to only relocate existing venues located outside of the Gambling Permitted Area to within a Gambling Permitted Area (Option B) and suggest that Council also allow relocation within a Gambling Permitted Area as well as to a Gambling Permitted Area.

RATIONALE

In principle, Trillian Trust does not support the Proposed Class 4 Gambling Venue Policy which proposes changes to the relocation policy which will eventually reduce the number of class 4 venues and machines throughout the district.

We outline our reasons not to support the proposed changes to the Class 4 Gambling Venue Policy below:

1. Reduction Of Funds To Sport, Community & Education Groups

Trillian Trust currently has 4 venues situated in Hamilton City which generate funds for the Hamilton City region:

- ***Cock & Bull Hamilton*** – 1 Corner Maui and Church Street, Pukete, Hamilton
- ***Danny Doolans Hamilton*** – 28 Hood Street, Hamilton
- ***The Local*** – 36 Bryant Road, Hamilton
- ***The Junction*** – 165 Commerce Street, Frankton, Hamilton

Each month, Trillian Trust approves many grant applications for various organisations. Our recipients in Hamilton City for the year end July 2015 is included with this submission. In this financial year, we were able to support many smaller Hamilton City organisations as well as large community organisations and key community events including:

- Balloons Over Waikato
- Hamilton Christmas Charitable Trust
- Hamilton Gardens Summer Festival Foundation
- True Colours Charitable Trust
- Te Awa River Ride Charitable Trust

Trillian Trust estimates that if one Hamilton venue with 18 gaming machines and an average weekly Gaming Machine Proceeds (GMP) of \$17,308.80¹ (based on current Department of Internal Affairs statistics) were to close and not replaced with another venue, there would be an approx. loss of \$313,063.51 (based on the required 40% return to community) per annum in funds to be contributed back to the local community, sports and education groups. There would also be an approx. loss of \$180,011.52 per annum in gaming duty to the government.

Current statistics from the Department of Internal Affairs shows that the number of venues within Hamilton City since 2010 has decreased by 3 and a reduction of gaming machine proceeds of \$1,100,487.75². This represents an approximate total of \$382,778.35 (based on 40% RTC) reduction of funds available to the Hamilton City community so far based on the current average machine banking in Hamilton.

¹ Gaming Machine Proceeds by District and Society, Department of Internal Affairs, April-June 2015, www.dia.govt.nz

² Summary of Expenditure by Territorial Authority/District, Department of Internal Affairs, June 2010-June 2015. www.dia.govt.nz

Trillian Trust is just one of the class 4 gaming trusts whom distribute funds to the Hamilton City community. Changes in the relocation policy will not only reduce funding from Trillian Trust, but all class 4 gaming trusts.

Any changes in the Class 4 Gambling Policy may also drive gamblers to Casinos whom only return 5% to the community which in turn, will further reduce the amount of funds contributed to the community.

2. Problem Gambling In Perspective

Trillian Trust supports any measures that prevent harm caused by gaming machines however believes that a sinking lid approach is not likely to have an effect on problem gambling. There has never been a question that problem gambling is an issue for those that it affects and those around them; however we must put the issue of problem gambling in perspective.

New Zealand has almost the lowest rate of problem gambling prevalence in the western world – even the Ministry of Health ranks problem gambling as one of the least prevalent mental health issues affecting New Zealanders, reporting³:

- That between 98.2% and 99.7% of adults are not engaged in problem gambling;
- 99.5% of New Zealanders did not seek help for problem gambling issues last year, and
- Of those who played gaming machines 99.78% did not seek help.

All machines are fitted with PID's (Player Information Displays) these displays interrupt the player every 25-30 minutes of continuous play and advise the player how much they have spent and lost, and how long they have been playing for.

The current Ministry of Health "Preventing and Minimising Gambling Harm Six Year Strategic Plan (2010/11-2015/16)" has a range of objectives and actions to support the reduction of problem gambling and harm from gambling and includes the capture of data and trend analysis. We believe that these strategies need time to provide good data and strategic solutions to the problem gambling issue to see whether they are having a beneficial impact.

A sinking lid policy in Hamilton is unlikely to have any effect on the number of problem gamblers in the city. By reducing the number of class 4 gaming venues, may actually drive gamblers away from the controlled environment of a gaming lounge, to an uncontrolled environment of online gambling which cannot be monitored at all; or other forms of gambling (TAB, Lotto, Casino).

3. Problem Gambling Support & Systems

Trillian Trust and our venues understand the harmful effects of Problem Gambling and that problem gambling has a social, economic and health impact on individuals, their families and their work place.

There is already a regulatory requirement for staff and managers of Class 4 gaming venues to be trained in how to recognise problem gamblers and how to intervene appropriately to ensure that they seek help and support for their problem. This, in our view, is the most effective way of helping

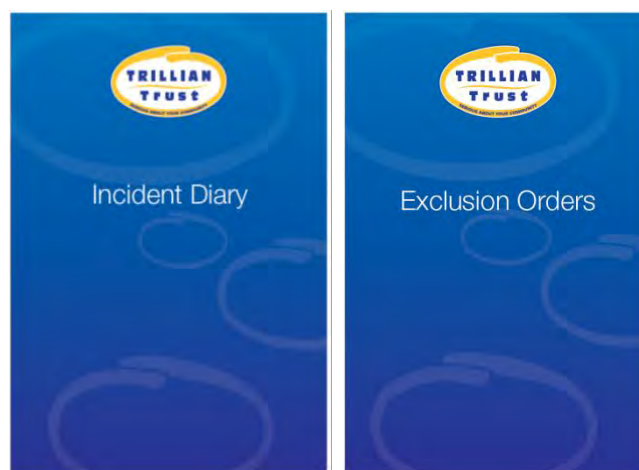
³ Problem Gambling in New Zealand, Ministry of Health, August 2012, www.health.govt.nz

the very small proportion of people who have a problem to manage that, whilst leaving the greatest proportion of people to fulfil their legitimate desire to gamble responsibly.

Trillian Trust provides significant funding to the Ministry of Health through an annual levy (\$411,515.00 in the year end July 2015). This funding helps problem gambling providers in Hamilton, including the Problem Gambling Foundation, the Salvation Army Oasis Centre and Gambling Helpline.

Trillian Trust provides significant on-going training to venues on how to identify and support problem gamblers. We also provide the following resources to venues:

- Trillian Trust Harm Minimisation Policy
- Quick Reference Guides to help identify problem gamblers
- Harm Minimisation Incident Diary to record any problem gambling issues
- Problem Gambling pamphlets
- Valued Customer Letter with information for problem gamblers
- Exclusion orders and an exclusion order process
- Signage to display in and around the gaming room



Venue resources to assist with problem gambling provided by Trillian Trust

Trillian Trust's venues also partake in the multi-venue exclusion (MVE) program which currently operates across all Class 4 and casino venues in Hamilton which provides Problem Gamblers with the option to exclude themselves from other venues within city boundaries. Problem Gambling Foundation currently administers this program in Hamilton.

Trillian Trust believes the most effective way to identify and treat problem gambling is by human interaction. We are focusing on delivering better systems at a venue level to ensure we identify any persons who may be having difficulty with gambling.

4. Gaming Machine Gambling as an Entertainment Option

The hospitality industry is a key component to the economic development of Hamilton City and a reduction in class 4 venues and gaming machines could have an impact on the variety of entertainment options within the industry available to local residents and tourists to Hamilton City.

We recognise that 'playing the pokies' is indeed a form of entertainment for many people. Not all players are problem gamblers, current research shows that between 98.2% and 99.7% of adults are not engaged in problem gambling⁴.

Recent documentation from the Ministry of Health also identifies that gambling can be a harmless entertainment activity from which people derive personal enjoyment and positive social effects. For example, a Department of Internal Affairs survey, People's Participation in, and Attitudes to, Gambling, 1985-2005 found, in the 2005 study, that 60% of participants said they gambled on class 4 gaming machines as a form of entertainment, and 16% as a way to be with people or to get out of the house⁵.

RECOMMENDATION

Trillian Trust supports Option B of the Statement of Proposal which allows relocation however recommends Council allow relocations within a Gambling Permitted Area as well as to a Gambling Permitted Area.

⁴ Problem Gambling in New Zealand, Ministry of Health, August 2012, www.health.govt.nz

⁵ Problem Gambling Resource of Local Government, Ministry of Health, 2010, www.health.govt.nz

GRANT RECIPIENTS – HAMILTON CITY**Trillian Trust****1 August 2014 – 31 July 2015****Grant Total: \$504,339.00**

Recipient	Amount Granted
Allied Netball Club Inc	\$6,331.00
Balloons over Waikato Charitable Trust	\$4,500.00
Cambridge Childcare Centre Trust Board	\$5,000.00
Catholic Family Support Services	\$510.00
Claudlands Rovers Sports Club Inc	\$4,800.00
Diversity Counselling New Zealand	\$1,159.00
Fairfield Otorohanga United Inc	\$10,417.00
Flagstaff Club Inc	\$2,556.00
Flagstaff Club Inc	\$1,400.00
Flagstaff Club Inc	\$4,486.00
Frankton Railway Combined Sports Club Inc	\$1,400.00
Frankton Rugby Sports Club	\$8,814.00
Hamilton Children and Families Trust	\$400.00
Hamilton Christmas Charitable Trust	\$7,536.00
Hamilton City Tigers Rugby League Club Inc	\$3,674.00
Hamilton Cricket Association Inc	\$7,903.00
Hamilton Gardens Summer Festival Foundation	\$10,000.00
Hamilton Girls High School	\$8,325.00
Hamilton In-Line Hockey Club Inc	\$7,477.00
Hamilton Marist Rugby Football Club Inc	\$4,811.00
Hamilton Marist Rugby Football Club Inc	\$14,586.00
Hamilton Old Boys Rugby and Sports Club Inc	\$7,215.00
Hamilton Punjabi Sports and Cultural Club Inc	\$2,325.00
Hamilton Rugby Referees Association	\$5,500.00
Hamilton Volleyball Club	\$2,900.00
Hillcrest High Rowing Club	\$2,400.00
Hukanui Rugby League Sports Inc	\$9,640.00
Hukanui School PTA	\$5,780.00
Institute for Child Protection Studies Trust	\$10,000.00
Knighton Normal School	\$5,710.00
Knighton Normal School	\$5,500.00
Knighton Normal School	\$3,492.00
Melville Rugby and Sports Club Inc	\$3,070.00
Northern Districts Cricket Association	\$99,280.00
Pacific Rose Festival Trust	\$3,093.00
Pacific Rose Festival Trust	\$3,000.00
Punjabi Knights Sports & Cultural Club	\$4,392.00
St Columba's School Board Of Trustees	\$29,315.00

St Joseph's Parent Teacher Friend Association	\$5,000.00
Te Awa River Ride Charitable Trust	\$50,000.00
Te Tuia Sports Club	\$3,656.00
The Royal New Zealand Plunket Society - Hamilton Branch	\$14,426.00
True Colours Charitable Trust	\$362.00
Waikato Combined Equestrian Group	\$15,000.00
Waikato Community Hospice Trust	\$9,000.00
Waikato Community Hospice Trust	\$12,000.00
Waikato Regional Volleyball Association	\$3,633.00
Waikato Rowing Club	\$11,766.00
Waikato Samoa Rugby & Sports Inc	\$1,052.00
Waikato University Hockey Club Inc	\$1,556.00
Waikato Valley Cricket Association Inc	\$10,582.00
Waikato Water Polo Club	\$3,859.00
Wanderers Sports Club Inc	\$3,750.00
Wanderers Sports Club Inc	\$40,000.00

Name: kylie bryant

Organisation (if applicable):

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

Comments:

To stay in line with the gambling act and reduce the harm gambling has on communities, the council must adopt a true sinking lid policy and not allow for any relocations of class four gambling venues.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

The locations outlined are welcomed. Our community of Fairfield/Enderley has enough access to gambling establishments and by being purposely left out of the permitted locations is a step in the right direction from the council to support our vulnerable

Proximity Restrictions:

Proximity restrictions are supportive of harm reduction. An inclusion of historical Maori sites would be welcomed also.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Comments:

With the amount of access to TAB in Hamilton city, as stated in the proposed policy there is no need for more Board Venues in the city. This would create more harm than good.

Name: Marawaatea

Organisation (if applicable): Marawaatea Maori Womens Welfare League Branch

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Option A - no relocation allowed/true sinking lid

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Yes

Name: Eru Loach

Organisation (if applicable): Problem Gambling Foundation of New Zealand

SECTION 2 - CLASS 4 GAMBLING VENUE POLICY

Council was divided on the issue of whether to continue to allow for the relocation of gambling venues. Half the Council supported a true sinking lid policy where relocation was not allowed (Option A). Half the Council, however, saw some value in retaining the relocation provisions in the policy providing the situations where relocations could take place were limited to allowing gambling venues that sit outside of the Gambling Permitted Area to move into a Gambling Permitted Area.

1. Which relocation option do you support?

Not Answered

Comments:

See attached submission.

2. Do you have any comments on the following issues as proposed in the Policy?

Please note, in Option A the location and proximity restrictions only apply to applications for two or more clubs to merge at a single existing venue. IN option B, the location and proximity provisions apply to both applications for two or more clubs to merge at a single existing venue and the relocation of Class 4 gambling venues.

Location Restrictions:

See attached submission.

SECTION 3 - TAB BOARD VENUE POLICY

3. Do you support the proposed TAB Board Venue Policy (no new venues) in principle?

Not Answered

TE RŌPŪ ĀWHINA MATE PETIPETI O AOTEAROA
**Problem Gambling Foundation
of New Zealand**



**Submission on the
Hamilton City Council
Gambling Venue Policy**

Eru Loach

Health Promoter

Problem Gambling Foundation of New Zealand

P. 07 9499866

E. eru.loach@pgfnz.org.nz

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EXECUTIVE SUMMARY

Electronic gambling machines (pokies) are not a harmless product that a few “weak willed” individuals need help with. They are the major cause of gambling harm in New Zealand. Pokie machines are designed to addict and cause substantial losses to users. Used as designed, they cause significant harm, which is why 2 in 5 regular gambling machine users develop a problem at some point. The 2.5% of our population experiencing direct—and often severe—harm from gambling is just the tip of the iceberg.

Each person with a gambling problem affects about 5-10 others. This means around 17,000 Hamiltonians are affected by the significant economic, health, personal, and social costs that gambling problems cause. The harms caused by pokies extend beyond individuals, affecting their families, friends, workmates, businesses and our community. For example, a study of gambling machines in Christchurch suggested that gambling machines in the region resulted in lost economic output of \$13 million, lost household income of \$8 million, and lost employment for 630 full-time equivalents. Economic losses in Hamilton are likely to be substantial.

We know that gambling machines are the major cause of gambling harm in New Zealand and have been identified as the main gambling mode of problem gambling clients seeking help. We know that a significant amount of the money lost in gambling machines—about 40-60%—is lost at the expense of people with gambling problems.

Two decades of working with NZ’s gamblers has shown that availability makes the difference, and this is what Hamilton City Council is successfully regulating. “Sinking lid” policies have helped reduce Hamilton’s gambling machine venue numbers over time, reducing availability and accessibility to gambling machines, and therefore reducing gambling harm. Hamilton is among seventeen councils around New Zealand have taken the lead and introduced “sinking lid” policies, backed by majority public opinions that these machines are socially undesirable and that there should be fewer of them.

Hamilton’s “sinking lid” policy is a popular and simple policy that only prevents new venues being allowed gambling machines. The strongest sinking lid policies state that when venues close those machines can’t be moved elsewhere.

Allowing relocations would weaken Hamilton’s sinking lid policy substantially, by allowing operators to maintain pokie numbers. Rather than allowing venues to close organically, this would allow failing venues to relocate their machines to busier areas and target new gamblers. For this reason we ask that the current policy be maintained with a ban on transfers.

Please do not hesitate to contact us if you have any questions.

Recommendations

- The Problem Gambling Foundation **recommends that Hamilton City Council maintain its “sinking lid” policy**: a district wide ban on any additional class 4 gambling venues or machines. A sinking lid policy that covers both machine numbers and venues is appropriate.

A policy that prevents transfers is recommended

- Allowing venues to transfer will not lead to a reduction of venues, and therefore will not reduce harm from gambling in the way that a strong “sinking lid” policy would. Venue transfers are primarily a way of maximising revenue and taking machines from quiet venues to busier venues. They are not a harm-reduction measure.

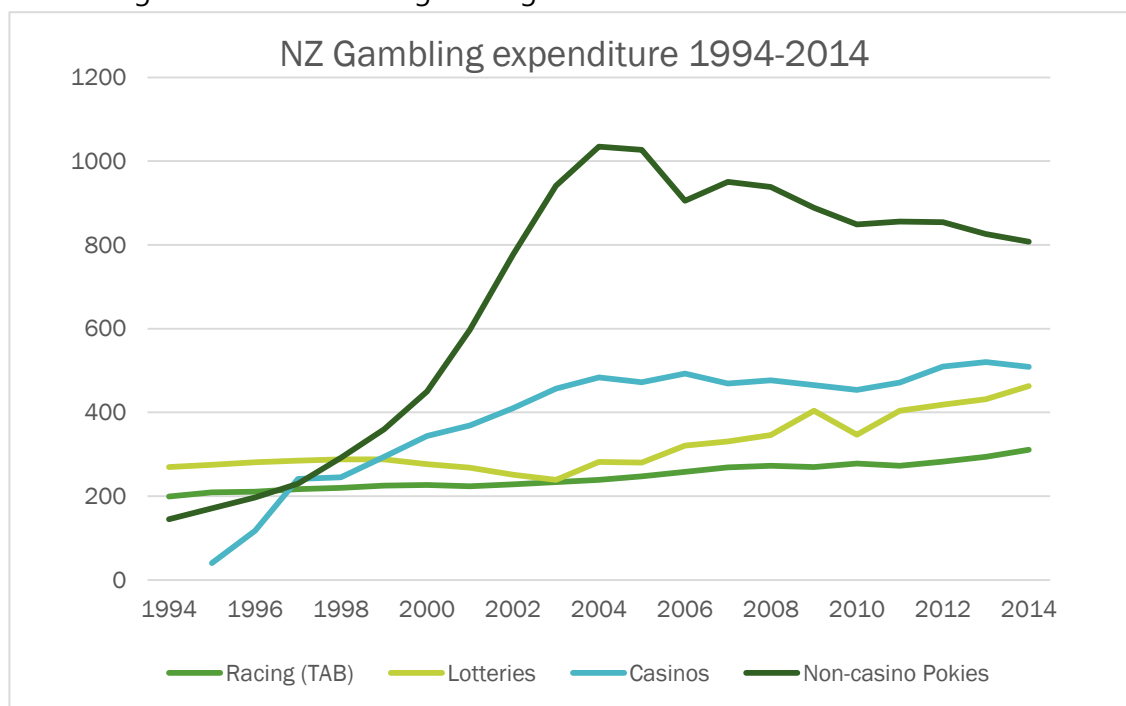
A restriction to two TAB venues is recommended

- The Problem Gambling Foundation is not directly concerned about an increase in the number of TAB venues. However any new venues that are established could include pokie machines and this is something that the Problem Gambling Foundation opposes. Recent new and refurbished TAB venues elsewhere in New Zealand have contained pokie machines, and this would risk an exemption to the sinking lid policy. Likewise, sports betting terminals could evolve and include a new user experience such as being able to sit at the machine while watching the game. As the Problem Gambling Foundation is unsure how sports betting will advance in the future, we recommend that the Council take a precautionary approach to the growth of TAB and terminal-based gambling. The Problem Gambling Foundation, therefore opposes any new TAB venues unless they specifically exclude sports betting terminals and pokie machines.

We would like to be heard in support of this submission.

CONTEXT AND SUMMARY OF LOCAL STATISTICS

- Gambling expenditure¹ has expanded rapidly in New Zealand during the last 20 years. Gambling expenditure nearly quadrupled from \$482 million in 1990 to \$2.091 billion in 2014.² Of that amount, nearly 40% is lost to non-casino gambling machines, making it by far the largest of the four main gambling sectors.

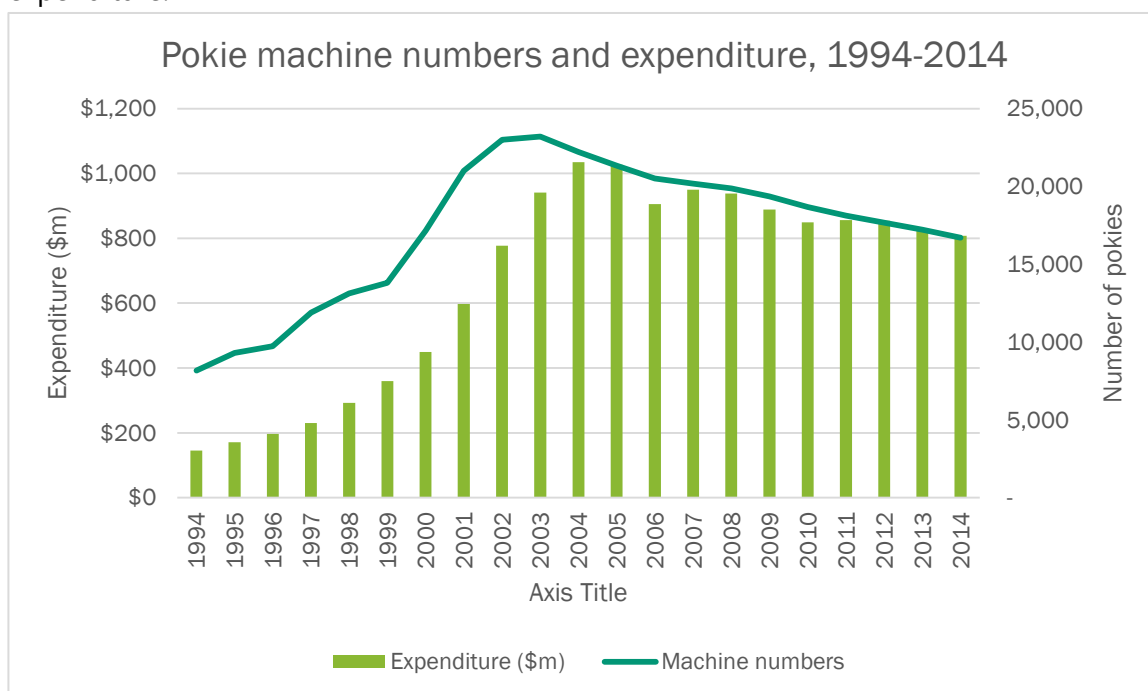


- In the 2013/14 financial year, total gambling expenditure for the four main sectors increased 0.9% from the previous year due to an increase in expenditure on Lotteries and racing products.

1 Expenditure and Gross Profit are interchangeable terms - they mean the gross amount wagered minus the amount paid out or credited as prizes or dividends. Expenditure is the amount lost or spent by users or the gross profit of the gambling operator.

2 Department of Internal Affairs. (2014). Gambling Expenditure Statistics. Retrieved 24 June 2015 from: http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Gambling-Expenditure-Statistics

- For the most part, however, a decrease in machines has led to a gradual decrease in expenditure.



- New Zealand lost \$808 million to non-casino gambling machines last year, or \$2.21 million a day.
- This is equivalent to about 55 million minimum wage hours.
- Hamilton city lost over \$22 million to non-casino gambling machines in the last year, or approximately \$60,500 per day.
- Hamilton currently has a density of 1 machine per 234 people over 18.³ With an average machine income of approximately \$49,500 per annum, this means that the average gambling machine in Hamilton makes over twice as much money as the average person living here (based on median income for people aged 15 years and over).
- Estimates are that 2.5% of the adult population in New Zealand – one in 40 – are problem gamblers or moderate-risk gamblers⁴ at any particular time.⁵ Based on these

³ Calculated using DIA gambling expenditure statistics and Statistics NZ 2013 Census data.

⁴ The term “problem gambler” refers to someone who scores 8 or more on the Problem Gambling Severity Index, and is defined as “Problem gambling with negative consequences and a possible loss of control.” The term “moderate-risk gambler” refers to someone who scores 3-7 on the PGSI, and is defined as “Moderate level of problems leading to some negative consequences”. The two terms are often combined when reporting prevalence of problem gambling.

estimates approximately 3500 people in Hamilton could be problem or moderate risk gamblers.⁶

- There are also a significant number of people who are harmed by someone else's gambling. It is estimated that at approximately 5-10 people are adversely affected to varying degrees by behaviour from a person experiencing problem gambling.⁷ This could be 17000 to 35000 people harmed from others' gambling in Hamilton.
- Over 74,000 people in New Zealand (2.4% of the total population) would expect to have a better state of mental health if there was no gambling.⁸ Of these, 69,500 would benefit from stopping gambling on gambling machines. In Hamilton, approximately 3000 people would be have better mental health without gambling.
- Submissions by the New Zealand Community Trust and other gambling machine trusts have attempted to down-play the number of local problem gamblers by reporting the number of people who have sought help for gambling within the Council area. There is a difference between the number of people with gambling problems and the number of people who have sought help for those problems; it is a gap we are seeking to close, and it is not a gap any of us can ignore. Those who seek help are just the tip of the iceberg both in terms of those with problem gambling but also in terms of the wide impact that problem gambling has on the community.

5 Based on the New Zealand 2012 National Gambling Study, which reports that "0.7% of adults (23,504 people) are current (past 12 months) problem gamblers experiencing significant problems, and a further 1.8% (60,440) are moderate-risk gamblers, experience some gambling-related harms and at risk for the development of more serious problems". Source: Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2014). New Zealand 2012 National gambling study: Gambling harm and problem gambling. Wellington: Ministry of Health.

6 Adult population for this district was determined using 2013 census data and the NZ.Stat tool from Statistics New Zealand, found online at <http://nzdotstat.stats.govt.nz/wbos/Index.aspx>.

7 The 2006/2007 New Zealand Health Survey found that "almost 3% of people had experienced problems due to someone's gambling in the previous 12 months, and this is consistent with overseas studies that estimate that between 5 and 10 people are affected by behaviour of a serious problem gambler."

Ministry of Health. 2009. Preventing and Minimising Gambling Harm: Consultation document. Six-year strategic plan; three-year service plan; problem gambling needs assessment; and problem gambling levy calculations. Wellington: Ministry of Health.

The Australian Productivity Commission estimated 5-10 people (average: 7.3) were impacted by problem gambling. Productivity Commission. (1999). Australia's Gambling Industries, Report No. 10, AusInfo, Canberra, Vol 1, p. 7.34

8 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE.

GAMBLING AND PROBLEM GAMBLING

Gambling Machines Are the Problem

- About 18% of adults use pub/club gambling machines over a 12 month period.⁹
- This means that at any given time in New Zealand, there is a ratio of 34 possible gambling machine users to any 1 machine.
- This means the \$808 million that gambling machines took last year doesn't add up from many people putting in a few coins. This figure would require each gambling machine user to spend—and lose—an average of over \$1,400.¹⁰
- Even fewer people use gambling machines on a regular basis (1.7% weekly or more often). The vast majority of adults (82%) never use gambling machines.¹¹
- Furthermore, the Council may find it helpful to know that the number of people who gamble on non-casino gambling machines is small compared to the number of people who find that form of gambling socially undesirable.¹²
- While 18% may not seem like a lot, this number means much bigger problems; there is a serious concern for the 18% of the population that uses non-casino gambling machines because of the risk involved with gambling machine use.¹³

9 Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2014). New Zealand 2012 National gambling study: Overview and gambling participation. Wellington: AUT.

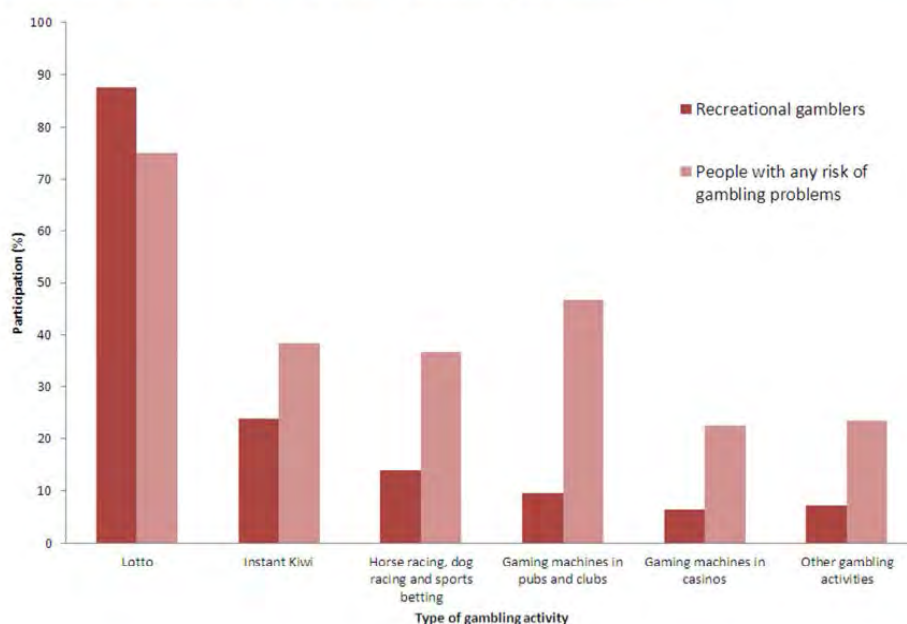
10 Adult population for this district was determined using 2013 census data and the NZ.Stat tool from Statistics New Zealand, found online at <http://nzdotstat.stats.govt.nz/wbos/Index.aspx>.

11 Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2014). New Zealand 2012 National gambling study: Overview and gambling participation. Wellington: AUT.

12 Department of Internal Affairs (2008). Peoples participation in, and attitudes to, gambling, 1985-2005. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/\\$file/GamblingParticipationSurvey1985-2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/$file/GamblingParticipationSurvey1985-2005.pdf)

13 Ministry of Health (2012). Problem Gambling in New Zealand: Preliminary Results from the New Zealand Health Survey. Wellington: Ministry of Health. Retrieved 29 January 2013 from <http://www.health.govt.nz/publication/problem-gambling-new-zealand-preliminary-results-new-zealand-health-survey>

Proportion participating in various forms of gambling: recreational gamblers compared to gamblers at any risk of gambling problems



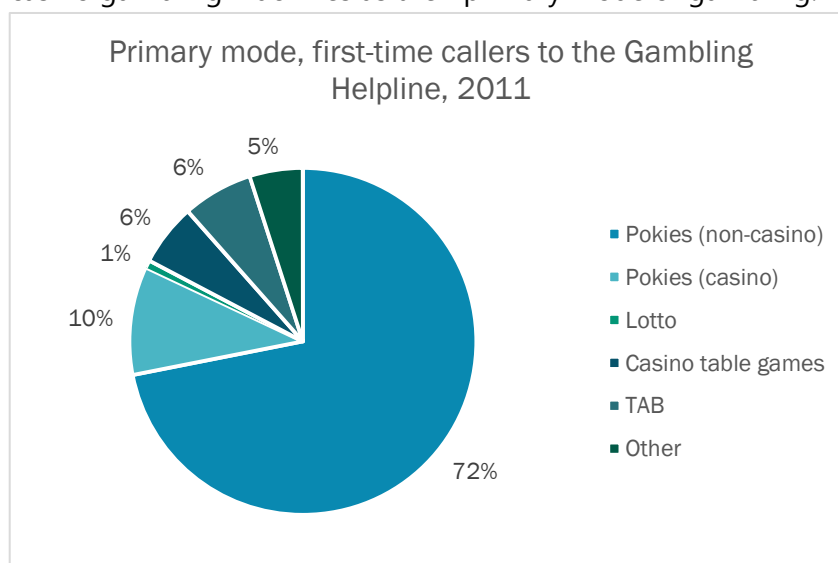
- Gambling machines are no ordinary commodity; it is estimated that:
 - 2 in 5 (40%) of regular gambling machine users (participates weekly or more) report experiencing a problem at some point.¹⁴
 - 1 in 5 (20%) of regular gambling machine users have current problems.¹⁵
- Non-casino gambling machines are the major cause of gambling harm in New Zealand (to individuals as well as the community). Non-casino gambling machines are the main gambling mode of problem gambling clients seeking help. In the most recently published Gambling Helpline report¹⁶:

14 Devlin, M. & Walton, D. (2012). The prevalence of problem gambling in New Zealand as measured by the PGSI: adjusting prevalence estimates using meta-analysis. *International Gambling Studies*, 10.1080/14459795.2011.653384. Retrieved 31-May 2012 from <http://www.tandfonline.com/doi/abs/10.1080/14459795.2011.653384>

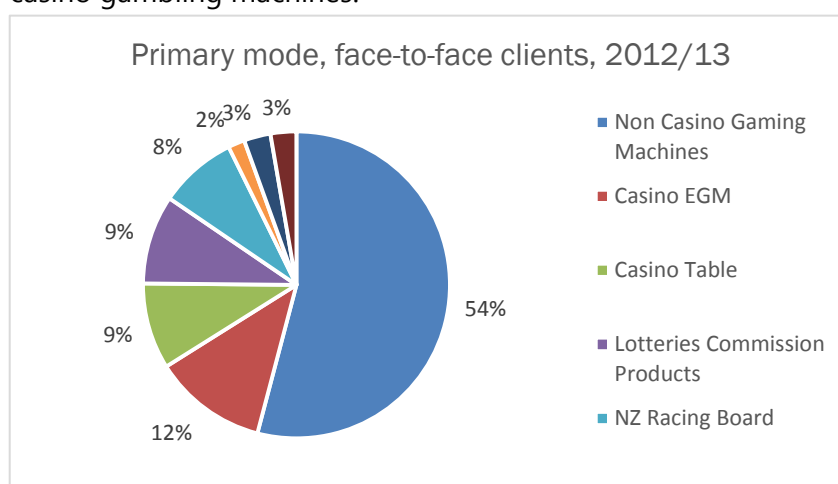
15 Department of Internal Affairs (DIA). (2009) Problem gambling in New Zealand – a brief summary. Retrieved 29 January 2013 from [http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/\\$file/ProblemGamblingFactsFinal.pdf](http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/$file/ProblemGamblingFactsFinal.pdf)

16 Ministry of Health. (2012). Gambling Helpline report for national statistics to 31 December 2011. Wellington: MOH.

- 72% of first-time callers to gambling helpline counselling services cited non-casino gambling machines as their primary mode of gambling.



- 54% of gambler clients attending face-to-face counselling cited non-casino gambling machines as their primary mode of gambling, and a further 12% cited casino gambling machines.¹⁷



How Gambling Machines Work

- Gambling machines are not a simple or harmless form of entertainment. A modern gambling machine is a subtle and sophisticated media experience, designed to keep

¹⁷ Ministry of Health (2013). Table 11: Problem gambling client presentation data. Provides information on client presentation numbers, both new and existing clients, by gambling industry sector, for the 2004/05 to 2012/13 Financial Years. Wellington, MOH. Retrieved from 30 June 2014 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data>

people using the machine as long as possible.¹⁸

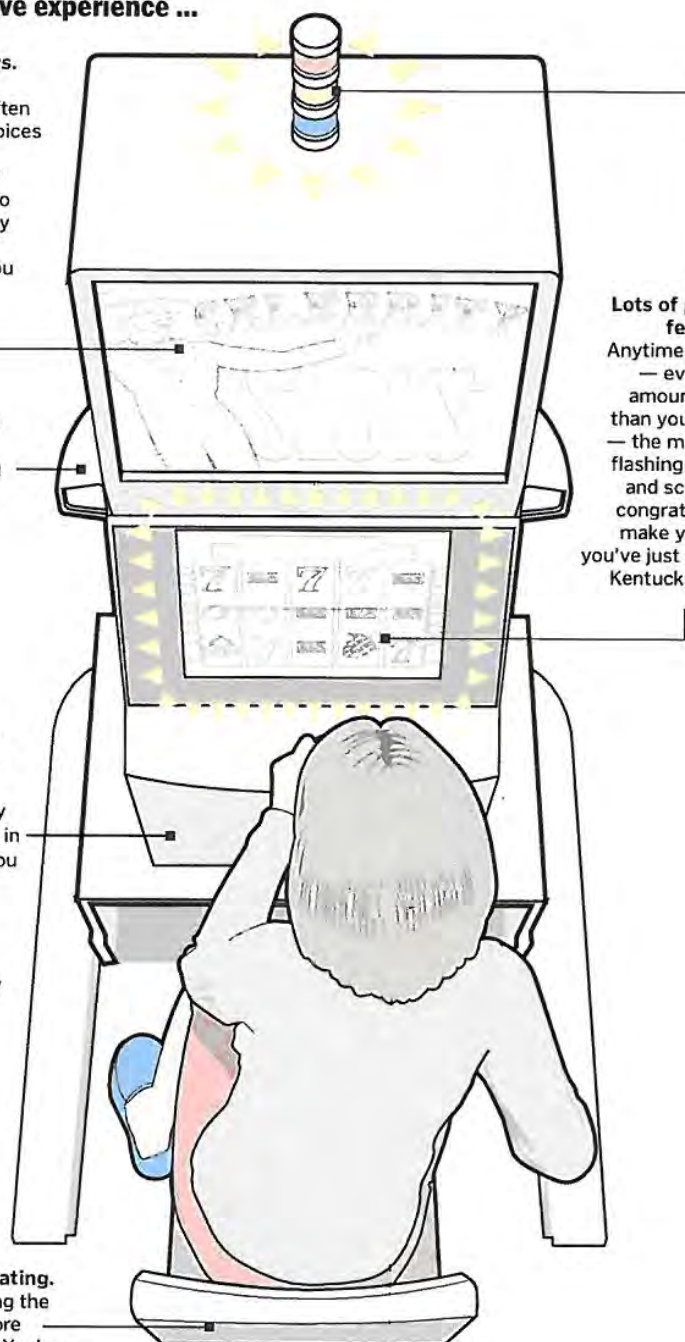
An immersive experience ...

Snazzy displays. Animated, entertaining, often including the voices and images of beloved TV and movie stars who goad you to play more and congratulate you when you win.

Directional speakers. They bathe you in sound, blocking out the noises from the room around you.

Easy payment plans. The new machines don't display dollar amounts — they deal exclusively in "credits" that you cash out later. This serves to separate you from the idea that it's actually **money** you're losing.

Comfortable seating. The higher paying the machine, the more comfy the chair. You're supposed to sink in and **never** want to get up.



Lots of positive feedback. Anytime you win — even if the amount is less than your wager — the machine's flashing screens and screaming congratulations make you think you've just won the Kentucky Derby.

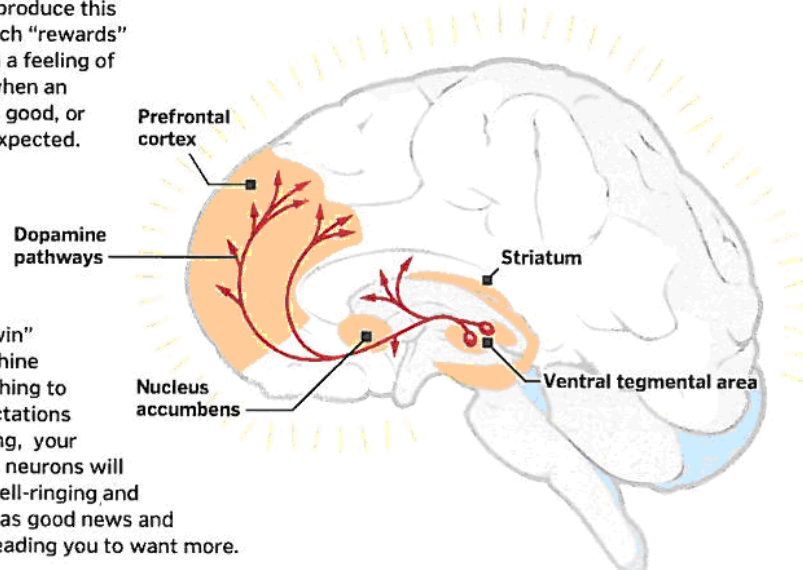
18 Mangels, J. and W. Neff (2011 May 15). How the machine works on you [infographic]. The Plain Dealer. Cleveland, OH.

... that has a profound effect

All this stimulation plays havoc with the **reward centers** of the human brain: those areas that are wired to anticipate some good result — such as the learning of a new skill — and make you feel good when it happens.

This reaction is fueled, in part, by the neurotransmitter **dopamine**. Special neurons in certain areas of your brain produce this chemical, which “rewards” the brain with a feeling of satisfaction when an outcome is as good, or better, than expected.

Although a “win” on a slot machine may have nothing to do with expectations or skill-learning, your dopaminergic neurons will take all that bell-ringing and light-flashing as good news and reward it — leading you to want more.



SOURCE: Luke Clark, University of Cambridge

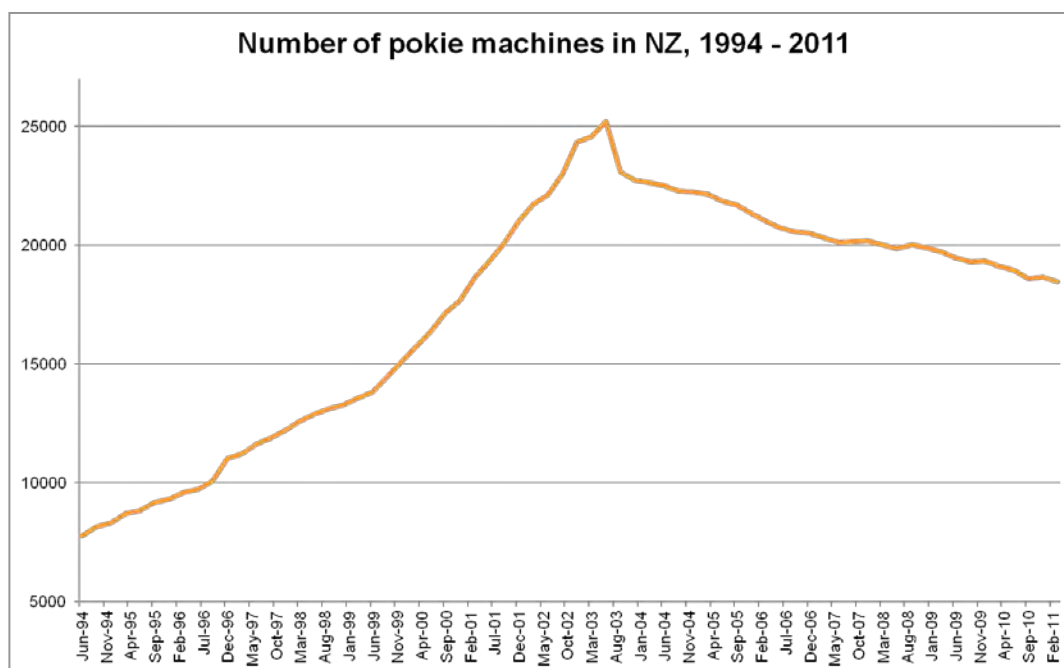
JOHN MANGELS, WILLIAM NEFF | THE PLAIN DEALER

- Gambling products use psychological tricks which take advantage of some of the faulty ways that we all, as human beings, think.
 - You haven't won all night, so the big win is on the way: This is not true. Gambling exploits our human misunderstanding of statistical probability and our ingrained belief in luck (even though statistics always prove us wrong).
 - The near-miss effect: Gambling machines exploit this, because a near-miss will trigger your brain in the same areas as if you had really won. These are also the same areas which are involved in drug addiction. This is why problem gamblers crave gambling and have compulsive thoughts about it. Machines will be programmed to show as many near-misses as they can get away with (most countries legislate how many times they can do this).
 - Creating immersive environments: Gambling machines make you forget the outside world through clever design. Dark backgrounds and deep but bright jewel-like colours attract and stimulate the brain. Spot-lit areas draw your focus in. Sound and light at random times both disorients the user and stimulates the brain at the same time.
 - Brain stimulation: The anticipation of gambling causes excitement, raised heart-rate, shallow breathing, and other nervous system responses. Winning and losing cause even greater responses, which are tied directly into our brain's reward centres. The design of modern gambling amplifies these even more. The reward areas of your brain take all the bell-ringing and light-flashing as good news and

reward your neurons with large hits of dopamine. This happens even when you are losing, and is why gambling can operate just like a drug or alcohol addiction.

Gambling Numbers

- Before 1988 there were no legal electronic gambling machines in New Zealand. In March 2014 there were 17,182 machines.¹⁹



- A New Zealand study acknowledged that there are many forces of work at play that can reduce problem gambling prevalence, including public health work, adaptation (when no new machines are introduced) and policy. The report found strong support for the “access thesis,” which says that increases of non-casino gambling machines lead to an increase in problem gambling prevalence. **Specifically, the study found that there is an increase in problem gambling by nearly one person per each new machine.**²⁰
- The report went so far as to state in its conclusion that, “from the perspective of public policy, and particularly harm minimisation, holding or reducing EGM [electronic gambling machine] numbers would appear to be prudent based on our findings, and is likely to

¹⁹ Department of Internal Affairs (DIA). (2014). Society, Venue and Gaming Machine Numbers: 31 March 2014. Retrieved 30 June 2014 from

[http://www.dia.govt.nz/Pubforms.nsf/URL/Stats_31%20March%202014.pdf/\\$file/Stats_31%20March%202014.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/Stats_31%20March%202014.pdf/$file/Stats_31%20March%202014.pdf)

²⁰ Abbott, M., Storer, J., & Stubbs, J. (2009 December). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9 (3), 225 – 244.

lead to reduced harm both through reduced availability and by enabling adaptation processes.”

- The same study supported the view that restricting the per capita density of gambling machines leads to a decrease in gambling harm.²¹
- In submissions to Councils, Jarrod True of the TAB challenged the findings of this study. Mr. True explains that “after reading the full study and reading the research data it does not appear that any strong correlation exists [between gambling machine access and problem gambling].” This claim should be disregarded for two obvious reasons.
- Mr. True’s analysis is contrary to conclusions articulated in the very abstract of the article, which states that “strong statistically meaningful relationships were found for an increase in prevalence with increasing per capita density of EGMs, consistent with the access hypothesis and supported by no evidence of plateauing of prevalence with increasing density of EGMs.”
- The assertions put forth by Mr. True carry less authority than that of three well-respected and qualified researchers, who almost unarguably are more qualified to interpret statistics and judge research. Mr. True’s assertions are also contrary to those accepted by the peer-review team that accepted the article for publication in the interdisciplinary journal where it appeared (a journal that was launched by a team of international experts with a commitment to the highest scholarly standards).
- The industry has, in the past, claimed that a decrease in gambling machine numbers will lead to an increase in other forms of gambling, but there is no need to be concerned that a sinking lid would have any such impact. **There is no evidence that a decrease or removal of non-casino gambling machines leads to a “transfer” to other types of gambling.**²²

²¹ Ibid, p.241.

²² Lund, I. (2009 March 26). Gambling behaviour and the prevalence of gambling problems in adult EGM gamblers when EGMs are banned: A natural experiment. *Journal of Gambling Studies*, 25:215-225.

Abbott MW. Do EGMs and problem gambling go together like a horse and carriage? *Gambling Research*. 2006;8(1):7–38.

Gambling Machine Density and Location

Vulnerability

- Certain population groups are more vulnerable to gambling problems in New Zealand. One major demographic factor is ethnicity.²³
 - Māori populations comprise 36.1% of intervention service clients²⁴ and 17.9% of Helpline callers²⁵, but make up only 15% of the population²⁶.
 - There has been a rise in the number of Māori women seeking help for gambling problems. Māori women seeking help for their gambling problems almost exclusively (85.6% in 2008) cite non-casino gambling machines as their problematic mode of gambling.²⁷
 - Pacific populations comprise 19.8% of intervention service clients²⁸ and 6.2% of Helpline callers²⁹, but make up only 7% of the population³⁰.

23 Ministry of Health. (2009). Preventing and minimising gambling harm: Consultation document; six-year strategic plan; three-year service plan; problem gambling needs assessment; and problem gambling levy calculations. Wellington: Ministry of Health. Retrieved 29 January 2013 from <http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/strategic-direction-overview/strategic-plans>

24 For the most recently reported period, July 2013-June 2014. Ministry of Health (2015). Intervention Client Data. Retrieved 11 May 2015 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data#ethnicity>

25 For the most recently reported period, 2011. Ministry of Health (2012). Gambling Helpline client data. Retrieved 2 July 2014 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/gambling-helpline-client-data>

26 Statistics New Zealand (2014). 2013 Census – Major ethnic groups in New Zealand. Retrieved 2 July 2014 from <http://www.stats.govt.nz/Census/2013-census/profile-and-summary-reports/infographic-culture-identity.aspx>

27 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

28 For the most recently reported period, July 2013-June 2014. Ministry of Health (2015). Intervention Client Data. Retrieved 11 May 2015 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data#ethnicity>

29 For the most recently reported period, 2011. Ministry of Health (2012). Gambling Helpline client data. Retrieved 2 July 2014 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/gambling-helpline-client-data>

30 Statistics New Zealand (2014). 2013 Census – Major ethnic groups in New Zealand. Retrieved 2 July 2014 from <http://www.stats.govt.nz/Census/2013-census/profile-and-summary-reports/infographic-culture-identity.aspx>

- Overall, Māori and Pacific adults are approximately four times more likely to be problem gamblers compared to the population.³¹
- Another major demographic factor in problem gambling is location in a highly deprived socio-economic area.³²
 - Although there has been a reduction in the number of non-casino gambling machines since 2005, they continue to be concentrated in more deprived areas.
 - Census area units with a deprivation decile rating of 8 or above accounted for 56% of all non-casino gambling machine expenditure.
 - Māori and Pacific peoples are over-represented in these deciles, which may make them more vulnerable.
 - Studies and data from New Zealand³³ and Australia³⁴ indicate that there are significantly more venues and electronic gambling machines in low-socio economic communities.
- While deprivation is a key driver of use, machines found in town-centre areas typically form the entertainment and shopping districts of a city and are highly accessible.
- Other demographic factors of vulnerable populations include age (35-44) and lack of educational qualifications, as well as workforce status (unemployed or out of workforce).³⁵
- Problem gambling is more common in individuals with major depression, anxiety, and personality disorders.³⁶

31 Ministry of Health (2009). A focus on problem gambling: results of the 2006/07 New Zealand Health Survey. Wellington: Ministry of Health.

32 Ibid.

33 Francis Group. (2009). Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health. Wellington: MOH.

Huriwai, T., Rigby, J. E., & Wheeler, B.W. (2006) Pokies and poverty: Problem gambling risk factor geography in New Zealand. *Health and Place*, 12 (1): 86-96.

34 Livingston, C., & Woolley, R. (2008). The relevance and role of gaming machine games and game features on the play of problem gamblers: Report for the Independent Gambling Authority (IGA). Adelaide, South Australia: IGA.

Doughney, J. (2007). Ethical blindness, EGMs and public policy. *Journal of Mental Health Addiction*, 5, 311-319.

35 Ibid.

36 Ibid

Petry, N.M., Stinson, F.S. & Grant, B.F. (2005). Comorbidity of DSM-IV pathological gambling and psychiatric disorders: Results from the National Epidemiologic Survey on Alcohol and Related Conditions. *The Journal of Clinical Psychiatry*, 66, 564-574.

- Substance abusers have a 2-10 fold increased risk for problem gambling.³⁷
- There is increasing concern around the vulnerability of youth populations to gambling as well; youth and young adults have high rates of problem gambling.³⁸

37 Ministry of Health (2009). A focus on problem gambling: results of the 2006/07 New Zealand Health Survey. Wellington: Ministry of Health.

38 C. Messerlian, J. Derevensky & R. Gupta (2005) Youth gambling problems: a public health perspective. Health Promotion International 20 (1): 6-79.

HOW GAMBLING HURTS HAMILTON

Personal and Social Costs

“For many people and their families, however, gambling has harmful consequences, and the negative effects on the community are far-reaching. The social costs of gambling are out of proportion to the number of problem gamblers.”³⁹

- While it may appear that the effects of gambling are limited to Hamilton’s estimated 3000 problem gamblers, the impact is serious and affects us all.
- Problem gambling imposes:
 - Personal costs (on the problem gambler).
 - Social costs (on family members, friends, co-workers, those with whom he or she has business relationships, and the general public as well).



Adapted from Australian Productivity Commission Report 1999

39 Ministry of Health. 2010. Preventing and Minimising Gambling Harm: Six-year strategic plan 2010/11–2015/16. Wellington: Ministry of Health.

- The “personal costs” can include: **depression and anxiety**; financial indebtedness; **bankruptcy**, arrest, imprisonment, **unemployment, divorce**, and poor physical and mental health.⁴⁰
- Gambling is a leading cause of **suicide**. A number of studies have shown a very clear link between problem gambling and suicidality,⁴¹ and the Problem Gambling Foundation regularly sees people who have attempted or considered taking their own lives.
- The “social costs” can include: impacts on the families of people experiencing gambling harm (through **family violence**, household stress, poor parenting, and family break-up); impacts on employers (through lost production, **fraud and theft**); impacts on the government (through **costs to the police, the criminal justice system, and the social welfare system**).⁴²
- A 2008 study found that “those who had higher levels of participation in gambling activities (based on time spent and losses relative to income) reported experiencing significantly **worse physical health, worse mental health**, and poorer feelings about self and **lower satisfaction with life**”.⁴³
- Recent research confirms that the proportion of New Zealanders experiencing broader gambling harms is much higher than the prevalence for problem gambling. **One in six New Zealanders say a family member has gone without something they needed or a bill has gone unpaid because of gambling.**⁴⁴ This percentage was higher among

40 Abbott, M. W. (2001, June). What do we know about gambling and problem gambling in New Zealand? Report number seven of the New Zealand gaming survey. Wellington: Department of Internal Affairs. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/Report7.pdf/\\$file/Report7.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/Report7.pdf/$file/Report7.pdf)

41 Moghaddam, JF; Yoon G; Dickerson DL, Kim SW, Westermeyer J (2015, June). Suicidal ideation and suicide attempts in five groups with different severities of gambling: Findings from the National Epidemiologic Survey on Alcohol and Related Conditions. *American Journal on Addictions*

42 Ibid.

South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide. (2005, November). Problem gambling and harm: Towards a national definition. Victoria: Department of Justice. Retrieved online 29 January 2013 from <http://www.adelaide.edu.au/saces/gambling/publications/ProblemGamblingAndHarmTowardNationalDefinition.pdf>

43 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

44 Abbott, M.W., Gray, R.J., & Walker, S.E. (2012 April). Knowledge, views, and experiences of gambling and gambling-related harms in different ethnic and socio-economic groups in New Zealand. *Australian and New Zealand Journal of Public Health*, 36, 2 (153-159).

Māori (38%) and Pacific (28%), and among those in more deprived (deciles 8-10) neighbourhoods.

Problem Gambling and Children

- When parents have problems with gambling, it is often children who suffer most. Young children can miss out on basic essentials if a parent has gambled away household money. Gambling can lead to broken homes, damaged relationships, physical and emotional harm, and a higher risk of the children becoming problem gamblers themselves. A single person's harmful gambling can affect five to ten people, and children are vulnerable when it's their parent or other close relative.
- A North American study found that children are often aware that their parents cannot provide them with items such as presents, school trips and even food not because of a lack of money but as a direct result of gambling behaviour.⁴⁵
- If children's needs are not being met, they can suffer from health problems due to poor nutrition or malnutrition, and the responsibility of meeting these needs may fall on extended family, schools and social services. This can cause those children to feel that they are not cared for – or cared about – by their parents.⁴⁶
- For children of problem gamblers, feelings of neglect can be a daily struggle. The parent may spend a great deal of time gambling, move out due to arguments about their gambling, or just disappear unpredictably.
- Losses can be emotional too. The parent's personality can become unrecognisable to their children, who feel gambling has become more important than family. Their relationship with their child or children can be damaged as they become more secretive, unreliable and prone to breaking promises.⁴⁷
- Children are more likely to suffer physical violence or abuse if they have parents with problem gambling, especially when combined with other problems such as alcohol abuse.⁴⁸ One study found that six out of 10 communities had increases in reported

45 McComb, J., B. Lee and D. Sprenkle (2009). "Conceptualizing and treating problem gambling as a family issue." *Journal of Marital & Family Therapy* 35(4): 415-431.

46 Dyall, L., Y. L. Thomas and D. Thomas (2009). "The impact of gambling on Māori." *Ngā Pae o te Māramatanga*

47 Ibid.

Darbyshire, P., C. Oster and H. Carrig (2001). "The experience of pervasive loss: Children and young people living in a family where parental gambling is a problem." *Journal of Gambling Studies* 17(1).

48 Lesieur, H. and J. Rothschild (1989). "Children of Gamblers Anonymous members." *Journal of Gambling Behavior* 5(4): 269-281.

domestic violence (including spousal and partner abuse) after casinos were introduced in the area.⁴⁹

- Problem gambling, especially when it is present alongside other disorders such as alcohol and drug abuse,⁵⁰ can increase the risk of children developing unhealthy behaviours. Alcohol abuse, educational difficulties, emotional disorders and suicidal tendencies are more likely when a parent gambles.⁵¹ Other associated problems include eating disorders, trouble sleeping⁵², asthma, allergies, and gastrointestinal disorders.⁵³
- Of all the studies done on children of problem gamblers, one of the most consistent findings is that they are far more likely to become problem gamblers themselves. Children with a family history of problem gambling are between 2 and 10 times more likely to develop gambling problems later in life. If the person in their life who gambled was their father, it may be as much as 14 times more likely.⁵⁴
- A study of gambling in Māori communities outlines a model of how children are at risk if gambling is a part of their young lives. When exposed to gambling activities from an early age, in the form of housie games at home or Marae fundraising activities played by their parents or whānau, children grow up seeing gambling as a normal activity and central to social life. They may be allowed – even encouraged – to participate from a young age. Dysfunction at home, in the form of financial problems or domestic violence increases the risk that they will look to gambling for an escape. As they grow their gambling may become more intense until it has become problematic. From there, debt may spiral out of control, relationships may erode, and their children may be neglected.⁵⁵

49 Shaw, M., K. Forbush, J. Schlinder, E. Rosenman and D. Black (2007). "The effect of pathological gambling on families, marriages and children." *CNS Spectrums* 12(8).

50 Rossen, F., R. Butler and S. Denny (2011). "An exploration of youth participation in gambling & the impact of problem gambling on young people in New Zealand." Ministry of Health.

51 Shaw, M., K. Forbush, J. Schlinder, E. Rosenman and D. Black (2007). "The effect of pathological gambling on families, marriages and children." *CNS Spectrums* 12(8).

52 Lesieur, H. and J. Rothschild (1989). "Children of Gamblers Anonymous members." *Journal of Gambling Behavior* 5(4): 269-281.

53 Horvath, V. and R. Pierce (2002). *Pathological gambling and child neglect: A cause for concern. The Downside: Problem and Pathological Gambling*. J. J. Marotta, J. A. Cornelius and W. R. Eadington. Carson City, Institute for the Study of Gambling and Commercial Gaming.

54 Dowling, N., A. Jackson, S. Thomas and E. Frydenberg (2010). "Children at risk of developing problem gambling." The Problem Gambling Research and Treatment Centre.

55 Dyall, L., Y. L. Thomas and D. Thomas (2009). "The impact of gambling on Māori." *Ngā Pae o te Māramatanga*.

- Children of problem gamblers face higher likelihoods of having some of the following disorders at some point in their life as compared to the general population.⁵⁶
 - Alcohol disorders (31% vs 4%)
 - Major depression (19% vs 7%)
 - Drug use disorders (5% vs 2%)
 - Antisocial personality disorder (5% vs 0%)
 - Generalised anxiety disorder (8% vs 0%)
 - Any psychiatric disorder (50% vs 11%)

Crime

Problem gamblers are at high risk of committing crimes in order to finance their gambling activities.

- Gambling-related crime has received considerable public attention in recent years, including recent media attention.
- Offending by gamblers has been investigated in a number of New Zealand and international studies. Despite difficulties in determining the extent of gambling-related crime and the causal pathways, it appears that problem gamblers are at high risk of committing crimes in order to finance their gambling activities.⁵⁷

⁵⁶ Data based on a study of problem gamblers' family members vs a control group. Shaw, M., K. Forbush, J. Schlinder, E. Rosenman and D. Black (2007). "The effect of pathological gambling on families, marriages and children." *CNS Spectrums* 12(8).

⁵⁷ Wheeler, S., Round, D. and Wilson, J. (2010), 'The Relationship between crime and gaming expenditure in Victoria', Melbourne: Department of Justice, Victoria.

Abbott, M., Bellringer, M., Brown, R., Coombes, D., Dyall, L., McKenna, B., & Rossen, F. (2009). Problem gambling: Formative investigation of the links between gambling (including problem gambling and crime in New Zealand). Auckland: Auckland University of Technology, report prepared for the Ministry of Health. Retrieved 29 January 2013 from http://www.aut.ac.nz/resources/research/research_institutes/niphmhr/report_final_gambling_and_crime.pdf

South Australian Centre for Economic Studies (SACES) (2009), Social Impacts of Gambling: A Comparative Study. Report commissioned by the South Australian Independent Gaming Authority, April. Adelaide: South Australian Independent Gaming Authority. Retrieved 29 January 2013 from <http://www.iga.sa.gov.au/pdf/research/SocialImpactsOfGamblingAComparativeStudyApril2009-PublishedVersion.pdf>

Ministry of Health. (2008). Raising the Odds? Gambling behaviour and neighbourhood access to gambling venues in New Zealand. Wellington: MOH.

May-Chahal, C. et al. (2007), Scoping Study for a UK Gambling Act: 2005 Impact Assessment Framework, London: Department for Culture, Media, and Sport. Retrieved 29 January 2013 from http://www.culture.gov.uk/images/research/scopingstudy_ga05iaf.pdf

- In 2008 a New Zealand study found that 25% of those engaged in criminal activity would not have done so if it had not been for their gambling. This suggests that just below a third of the relevant population—10,000 people—committed illegal activities because of gambling.⁵⁸
- Problem gambling has been linked to criminal activity and studies have suggested that much of the crime goes unreported.⁵⁹ Apart from the financial cost of gambling-related crime to organisations and individuals directly involved, there are often financial and other costs for people experiencing problem gambling who are convicted, as well as for their families.⁶⁰
- A 2009 New Zealand study found that “gamblers and significant others believe that a relationship exists between gambling and crime” and that “there is substantial unreported crime, a large proportion of which is likely to be related to gambling and that there are a large range of crimes committed in relation to gambling (particularly continuous forms of gambling), and not just financial crimes”.⁶¹ They suggest that 10% of people experiencing problem gambling and 2/3 of those receiving counselling for gambling-related issues have committed a crime because of their gambling.

Economic Degradation

- There is limited data and analysis regarding the economic impact of gambling in New Zealand. Still, New Zealand and international research have pointed out the losses that offer a sharp contrast to the often celebrated economic gains the gambling industry produces. Money for gambling is diverted from savings and/or other expenditure, and

58 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

59 Abbott, M., Bellringer, M., Brown, R., Coombes, Dyall, L., R., McKenna, B., & Rossen, F. (2009). Problem gambling: Formative investigation of the links between gambling (including problem gambling and crime in New Zealand). Auckland: Auckland University of Technology, report prepared for the Ministry of Health. Retrieved 29 January 2013 from http://www.aut.ac.nz/resources/research/research_institutes/nipmhr/report_final_gambling_and_crime.pdf

60 Australian Productivity Commission. (2010). Gambling: Inquiry Report. Canberra: Commonwealth of Australia. 16, 231, 280.

Department of Internal Affairs (DIA). (2009) Problem gambling in New Zealand – a brief summary. Retrieved 29 January 2013 from [http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/\\$file/ProblemGamblingFactsFinal.pdf](http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/$file/ProblemGamblingFactsFinal.pdf)

61 Abbott, M., Bellringer, M., Brown, R., Coombes, Dyall, L., R., McKenna, B., & Rossen, F. (2009). Problem gambling: Formative investigation of the links between gambling (including problem gambling and crime in New Zealand). Auckland: Auckland University of Technology, report prepared for Ministry of Health. Retrieved 29 January 2013 from http://www.aut.ac.nz/resources/research/research_institutes/nipmhr/report_final_gambling_and_crime.pdf

can have a negative impact on local businesses and the economic health and welfare of whole communities.⁶²

- A recent report noted that jobs and economic activities generated by gambling expenditure would exist elsewhere if that money was spent outside the gambling industry.⁶³
- Employment, normally considered a standard business cost, is framed within the gambling industry as a special benefit to the community. Even if gambling does create employment opportunities, a comparison of gambling and retail in terms of jobs created for every million dollars spent shows that gambling creates about half as many jobs as retail.⁶⁴
- The Christchurch City Council May 2009 study *Economic Impacts of NCGMs on Christchurch City* suggests that over the course of a year, gambling machines in Christchurch result in lost economic output of \$13 million, additional GDP of \$2 million, lost employment for 630 full-time equivalents, and lost household income of \$8 million.⁶⁵ The impact on Hamilton is likely to be proportionate and worth millions of dollars in lost economic activity and employment.

62 Harrison, B. (2007). Casinos and regeneration: the story so far, briefing paper no. 1. London: IPPR (Institute for Public Policy Research, UK). Retrieved 29 January 2013 from <http://www.eukn.org/dsresource?objectid=146582>

63 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

64 Per million dollars spent, gambling generates approximately 3.2 jobs while retail produces approximately 6.3. South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide. (2005, November). Problem gambling and harm: Towards a national definition. Victoria: Department of Justice. Retrieved online 29 January 2013 from [http://www.gamblingresearch.org.au/CA256902000FE154/Lookup/GRA_Reports_Files1/\\$file/FinalReportPrinter.pdf](http://www.gamblingresearch.org.au/CA256902000FE154/Lookup/GRA_Reports_Files1/$file/FinalReportPrinter.pdf)

65 Colegrave, F. & Simpson, M. (2009 May). The economic impacts of NCGMs on Christchurch City: Prepared for Christchurch City Council. Auckland: Covec, Ltd.

REDUCING GAMBLING HARM IN HAMILTON

Increased availability of opportunities to gamble is associated with more gambling and more problem gambling.

- Although it is sometimes difficult to determine whether gambling *causes* problems, or is merely *associated* with them, there is evidence that problem gambling harms can be reversed.⁶⁶ This means that at the least, there is the potential to reduce the prevalence of problem gambling, and at most, the prevalence of many other problems as well.
- A key question has been whether gambling machine supply contributes to problem gambling. Research has signalled that indeed restricting accessibility of gambling venues and machines would help curb problem gambling.
- A recent New Zealand Ministry of Health survey found some significant associations between gambling accessibility and gambling behaviour. Gambling behaviour, they state, is strongly associated with the distance to the nearest gambling venue.⁶⁷ The more gambling venues there are within 5kms of a person's neighbourhood the more likely that the person would have gambled at the gambling venue in the last year.
- A range of other studies have also indicated a link between the availability of some types of legal gambling and problem gambling. The evidence for the availability hypothesis has been considered by official review bodies in New Zealand⁶⁸, Australia⁶⁹, the United

66 Winters, K. C., Stinchfield, R. D., Botzet, A., & Slutske, W. S. (2005). Pathways of youth gambling problem severity. *Psychology of Addictive Behaviors*, 19(1), 104-107.

Abbott, M., Bellringer, M., Reith, G., & Volberg, R. (2004). A review of research on aspects of problem gambling: Final report. Auckland: Auckland University of Technology, report prepared for Responsibility in Gambling Trust, UK.

67 Ministry of Health. (2008) Raising the odds? Gambling behaviour and neighbourhood access to gambling venues in New Zealand. Wellington: MOH. Retrieved 29 January 2013 from <http://www.health.govt.nz/system/files/documents/publications/raising-the-odds-may08.pdf>

68 Ibid.

Day, P., Hiscock, R., Mason, K., & Pearce, J. (2008). A national study of neighbourhood access to gambling opportunities and individual gambling behaviour [Abstract]. *Journal of Epidemiology and Community Health*, 26, 849, 862-868.

Abbott, M., Clarke, D., Townsend, S., & Tse, S. (2006, July). Key indicators of the transition from social to problem gambling. *Journal of Mental Health and Addiction* 3, 29-40.

69 Hancock, L. & O'Neil, M. (2010, August). Risky business: Why the commonwealth needs to take over gambling legislation (Alfred Deakin Research Institute). Retrieved 29 January 2013 from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>

Bates, G., Jessop, G., Kyrios, M., Meredyth, D., Moore, S., & Thomas, A. C. (2009, November) Gambling and the multidimensionality of accessibility: More than just proximity to venues [Abstract]. *International Journal of Mental*

States⁷⁰, and Canada⁷¹. Each concluded that increased availability of opportunities to gamble was associated with more gambling and more problem gambling.

- A recently produced report, cited in a previous section, conducted a meta-analysis from numerous key Australian and New Zealand studies and found a strong statistically meaningful relationship between the increases in gambling prevalence with increased per capita gambling machine density. It also found that contrary to previous studies, there was no evidence for plateau of gambling prevalence with increased density of machines.⁷²
- A later study in the UK acknowledged that decreases in gambling-related problems are a complex process involving not only social adaptation, but also the implementation of public health policies and the provision of specialist services. The adaptation process also seems to be inconsistent across communities; different groups of people are affected differently by the process.⁷³
- Most reliable research would indicate that there is no single cause which triggers problem gambling. The phenomenon is a result of the combination of several factors, some of which have been outlined in the diagram below.⁷⁴ Several of these factors can

Health and Addiction. Retrieved 29 January 2013 from <http://www.springerlink.com/content/9712354144832410/>
 Doughney, J. 2006. The poker machine state in Australia: A consideration of ethical and policy issues. *International Journal of Mental Health and Addiction*, 4, 351-368.

70 Barnes, G. M., Hoffman, J. H., Tidwell, M. C. O., Wieczorek, W. F., & Welte, J. W. (2007). Type of gambling and availability as risk factors for problem gambling: A Tobit regression analysis by age and gender. *International Gaming Studies*, 7(2), 183-198.

71 Ontario Problem Gambling Research Centre. (2010). Problem Gambling Framework. Retrieved 29 January 2013 from Ontario Problem Gambling Research Centre Web site:
<http://www.gamblingresearch.org/content/default.php?id=2007>

Robitaille, E., & Herjean, P. (2008). An analysis of the accessibility of video lottery terminals: the case of Montréal. *International Journal of Health Geographics*, 7(2).

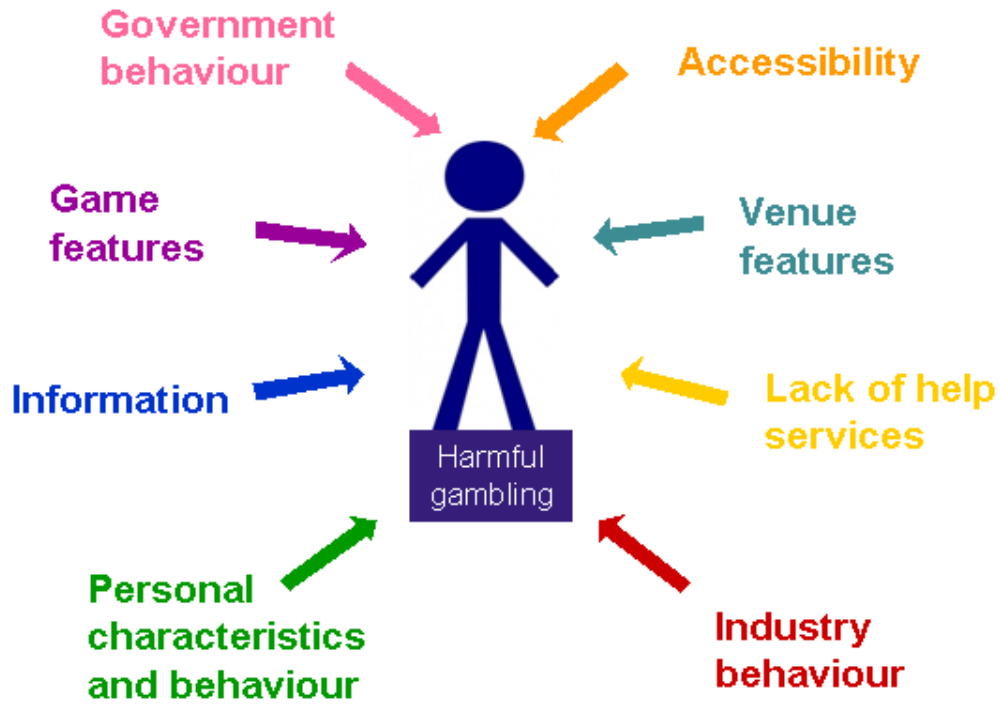
Cantinotti, M., Jacques, C., Ladouceru, R., & Sevigny, S. (2008). Links between casino proximity and gambling participation, expenditure, and pathology. *Psychology of Addictive Behaviors*, 22(2), 295-301.

72 Abbott, M., Storer, J., & Stubbs, J. (2009). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9, 225-244.

73 Griffiths, M.D (2007). *Gambling addiction and its treatment within the NHS*. London: British Medical Association. Retrieved 29 January 2013 from http://www.bma.org.uk/images/gambling_tcm41-146741.pdf

74 Productivity Commission. (1999). *Australia's Gambling Industries*, Report No. 10, AusInfo, Canberra, Vol 1, p. 323. Retrieved 29 January 2013 from http://www.pc.gov.au/_data/assets/pdf_file/0004/82552/gambling1.pdf

be influenced by the Council.



ETHICS OF GAMBLING FUNDING

How Gambling Machine Trusts Work

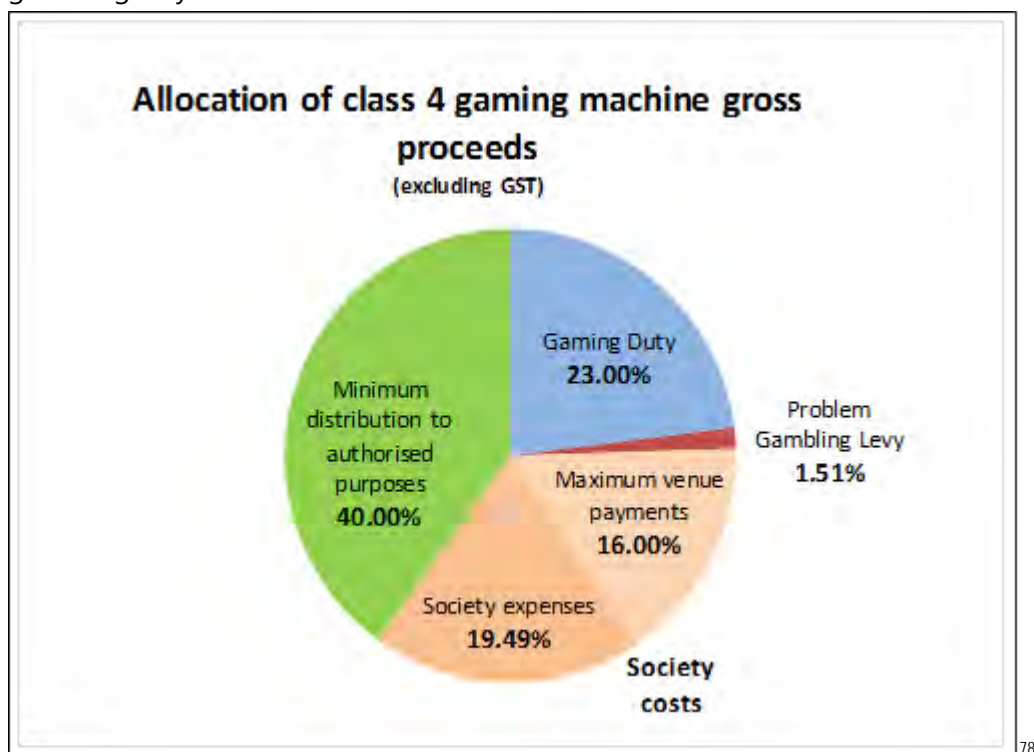
- Gambling trusts were established under the Gambling Act 2003 in an attempt to off-set some of the harm caused by gambling by returning some of the gambling expenditure to the people in the form of community grants. **Although the purpose of the trusts is to distribute money to the community, the purpose of gambling is not to raise money for the community, and it should not be perceived as such.**
- Gambling machines are licensed to operate in pubs and clubs only as a form of community fundraising.⁷⁵ Licence holders must distribute their net proceeds to the community by way of grants.
- They are currently required to distribute a minimum of 40% of their GST exclusive gross proceeds for each of its financial years (Gambling (Class 4 Net Proceeds) Regulations 2004. Part 2 Section 9 (1) and 10).⁷⁶
- Legislation dictates that each dollar of gross proceeds (i.e., turnover [aggregate stakes] minus user wins) must be distributed in accordance with the pie chart shown in the figure below.⁷⁷ These include the fixed amounts towards gambling duty and the problem

⁷⁵ Clubs are permitted to be societies and to operate their own machines in their own clubrooms. They are not required to make grants to other community organisations but can do so.

⁷⁶ Government also receives tax revenue from gambling taxes and levies which it redistributes for public purposes. NCGM gambling machines are the largest source of tax revenue: 20 percent tax rate, 1.1 percent problem gambling levy and GST (Inland Revenue 2006).

⁷⁷ Ministry of Health. 2009. Problem Gambling Resource for Local Government. Wellington: Ministry of Health. Retrieved 29 January 2013 from <http://www.health.govt.nz/system/files/documents/publications/problem-gambling-resource-local-government.doc>

gambling levy.



- In 2005 (the last time DIA completed an analysis of grants), gambling machine societies allocated \$317 million to authorised purposes. 47% of that went to sports and physical activities, the single largest category of recipient in 2005. **In 2005 almost 8% (over \$20 million) went to horse racing, mostly for stake money for races.**⁷⁹ Of machines operated by the New Zealand Racing Board, approximately 80% of income from machines goes to support racing.
- While the grants made by community funding bodies like the New Zealand Lottery Grants Board are well documented, no comparable aggregate statistics are readily available for the allocation to authorised purposes of the profits of non-casino gambling machines.⁸⁰

78 Chart originally published by the DIA in the document "Pokies in New Zealand: A guide to how the system works", downloaded from <http://www.dia.govt.nz/Services-Casino-and-Non-Casino-Gaming-Gambling-in-Pubs-and-Clubs-%28Class-4%29>

79 Department of Internal Affairs. (2007). Where do gaming profits go? A survey of the allocation for authorized purposes of non-casino gaming machine profits in 2005. Page 33. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/\\$file/GamingMachineProfits_2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/$file/GamingMachineProfits_2005.pdf)

80 Ibid.

- The Problem Gambling Foundation believes that we need a more open, lower cost, and transparent system to end the rorts, the lack of compliance, and the illegal activity associated with the current gambling machine trusts system.⁸¹ We also want greater transparency around who does and doesn't get grants and why.
- The current gambling machine trust system (around 50 gambling machine trusts) is inefficient. Society expenses are approximately 22%⁸² (over \$150 million) with much duplication of roles and resources.

Regressive nature

- Gambling generates significant funding for community purposes. However, gambling funding raises revenue at a very high cost. International and New Zealand studies have identified that gambling is sharply regressive. Income is effectively being redistributed away from low income communities.⁸³
- One attraction of using gambling to collect public funding is that it appears to be "painless" or "voluntary". The "painless voluntary donation" view has been criticised on grounds that it is highly regressive and exploits the false hopes or financial risk-taking of those on lower incomes. It is also argued that many of the gamblers contributing are, at the time of making their contribution, affected by drugs, alcohol, and possibly mental illness. **In other words, for a problem gambler, the contribution is not a voluntary one.**⁸⁴
- **A significant amount of the money generated from gambling comes at the expense of people with gambling problems.** A 2000 study in New Zealand estimated that

81 There have been a steady stream of media stories in recent years highlighting rorts and illegal activity surrounding pokie trusts and the pokie grant system. PGF has these documented in its online library and they can be made available on request.

82 Department of Internal Affairs. (2007). Where do gaming profits go? A survey of the allocation for authorized purposes of non-casino gaming machine profits in 2005. Page 33. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/\\$file/GamingMachineProfits_2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/$file/GamingMachineProfits_2005.pdf)

83 Hancock, L. & O'Neil, M. (2010, August). Risky business: Why the commonwealth needs to take over gambling legislation (Alfred Deakin Research Institute working paper 11). Retrieved 29 January 2013 from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>

Uniting Care Australia (2009), Submission to the Productivity Commission Inquiry into Australia's Gambling Industries. Page 50. Retrieved 29 January 2013 from http://www.unitingcare.org.au/images/stories/submissions/sub_productivity_com_gambling_may09.pdf

84 Bostock, W. (2005) Australia's gambling policy: motivations, implications and options. Journal of Gambling Issues, 13. Retrieved 29 January 2013 from <http://jgi.camh.net/doi/full/10.4309/jgi.2005.13.4>

problem gamblers account for about 20% of gambling expenditure.⁸⁵ A 2010 report in Australia said figures could be as high as 40-60% for gambling machine gambling.⁸⁶

- Studies involving cost benefit analysis have argued that the benefits from gambling for the majority of people gambling are individually very small relative to the costs borne by the minority of people experiencing gambling harm.⁸⁷
- Lower-income households spend proportionately more of their money on gambling than higher-income households.⁸⁸ People who are already socially and economically disadvantaged are most susceptible to gambling problems.⁸⁹ This can concentrate the negative impact of gambling in areas which are already deprived, and thereby increase inequalities in our communities.
- Furthermore, the revenue generated by gambling within a community is often spent in a more affluent community.⁹⁰ A 2004 study examining distribution of community benefit funding from six major EGM trusts found that more affluent areas (such as Central

85 Abbott, M. W. and Volberg, R. A. (2000), Taking the Pulse on Gambling and Problem Gambling in New Zealand: A Report on Phase One of the 1999 National Prevalence Study, Wellington: DIA. Retrieved 29 January 2013 from http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Our-Research-and-Reports-New-Zealand-Gaming-Survey?OpenDocument#ph1

86 Australian Productivity Commission. (2010). Gambling: Inquiry Report. Canberra: Commonwealth of Australia. 16. Retrieved 29 January 2013 from http://www.pc.gov.au/__data/assets/pdf_file/0010/95680/gambling-report-volume1.pdf

87 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

88 McMullan, J.L. (2005). The Gambling Problem and Problem Gambling. Conference conducted at the 4th Annual Alberta Conference on Gambling Research, Public Policy Implication of Gambling Research, University of Alberta, Canada. Retrieved 29 January 2013 from <https://dspace.ualgary.ca/bitstream/1880/47421/13/mcmullan.pdf>

89 Abbott, M., Landon, J., Page, A., Palmer, K., Thorne, H. (2010). Focused literature review for the problem gambling programme: Final report for the Health Sponsorship Council. Auckland University of Technology, Auckland. Retrieved 29 January 2013 from <http://www.hsc.org.nz/sites/default/files/publications/HSC-PG-ReviewFinal-Sept2010.pdf>
 Doughney, J. , & Kelleher, T. (2008/09). Victorian and Maribyrnong gambling: a case of diverted consumer spending. An Unconscionable Business: The Business: The Ugly Reality of Electronic Gambling: a Selection of Critical Essays on Gambling Research, Ethics and Economics. Cited in Borrell, J. (2009). Submission to the productivity commission gambling inquiry. Kildonan Uniting Care: Whittlesea, Melbourne. Retrieved 29 January 2013 from http://www.pc.gov.au/__data/assets/pdf_file/0006/87630/sub163.pdf

90 Adams, P.J., & Rossen, F.V. (2005). The ethics of receiving funds from the proceeds of gambling. Centre for Gambling Studies, University of Auckland: Auckland.

Auckland and the North Shore) were receiving considerably more funding per capita than the lower income areas (such as Manukau City).⁹¹

Impact of Proposed Policy on Community Funding

- There are concerns that a reduction in gambling machines will cause a reduction in gambling machine income to societies which will have the flow on effect of cutting the level of grants made to local community groups.
- While gambling machine revenue is declining, recent years have still seen record gambling machine grants to the community.⁹²
- Gambling machine trusts often insinuate that many community groups would not survive without gambling machine money. While it's true that some groups would suffer, gambling machine trusts account for only 10.2% of charitable giving in New Zealand; as a comparison, personal giving accounts for 58% of charitable giving in New Zealand.
- Existing gambling machine venues are not affected by a "sinking lid" policy. A "sinking lid" only prevents new venues from being granted a licence, so the decline in venues and machines happens gradually. Therefore, a "sinking lid" policy should not have an immediate or significant impact on community funding.
- Some groups have even argued that gambling machine handouts actually weaken community groups and that traditional fundraisers are much better at building community spirit and keeping sports and other groups strong.⁹³

91 Adams, P., Brown, P., Brown, R., Garland, J., Perese, L., Rossen, F., & Townsend, S. (2004) Gambling Impact Assessment for Seven Auckland Territorial Authorities. Part One: Introduction and Overview. Centre for Gambling Studies, University of Auckland. Retrieved 29 January 2013 from http://www.fmhs.auckland.ac.nz/soph/centres/cgs/_docs/2004adams2_overview.pdf

92 Department of Internal Affairs. (2010). Gambling Expenditure Statistics 1986-2010. Retrieved 29 January 2013 from: [http://www.dia.govt.nz/pubforms.nsf/URL/Expendstats1986-2010.pdf/\\$file/Expendstats1986-2010.pdf](http://www.dia.govt.nz/pubforms.nsf/URL/Expendstats1986-2010.pdf/$file/Expendstats1986-2010.pdf)
 Department of Internal Affairs. (2007). Where do gaming profits go? A survey of the allocation for authorized purposes of non-casino gaming machine profits in 2005. Page 33. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/\\$file/GamingMachineProfits_2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/$file/GamingMachineProfits_2005.pdf)

93 Gamblefree Day prompts call for funding boycott. (2011 September 1). ONE News. Retrieved 29 January 2013 from <http://tvnz.co.nz/national-news/gamblefree-day-prompts-call-funding-boycott-4378621>

Inglis, S. (2011 August 20). Editorial: Gambling much bigger problem. Bay of Plenty Times. Copy available upon request.

de Graaf, P. (2010 July 18). Pub: Ditching pokies worth the gamble. Northern Advocate. Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/local/news/pub-ditching-pokies-worth-the-gamble/3917450/>

Thomas, A. (2009 February 16). Rugby – 'crisis meeting' resuscitates Mangakahia. Northern Advocate Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/sport/news/rugby-crisis-meeting-resuscitates-mangakahia/3795053/>

- When it comes to raising money through gambling, a 2007 survey indicated 51% of people felt that it did more harm than good. Only 26% felt that it did more good than harm.⁹⁴
- Very few people (12%) support the current gambling machine trust system of distributing gambling machine funding. People were most supportive of a system similar to the Lottery Grants Board.⁹⁵

McNeilly, H. (2008 July 31). Giving up pokie funding right call: Mission. Otago Daily Times. Retrieved 29 January 2013 from <http://www.odt.co.nz/news/dunedin/15633/giving-pokie-funding-right-call-mission>

94 National Research Council. (2007). 2006/07 Gaming and betting activities survey: New Zealanders' knowledge, views and experiences of gambling and gambling related harm. Commissioned by the Health Sponsorship Council. National Research Council: Auckland.

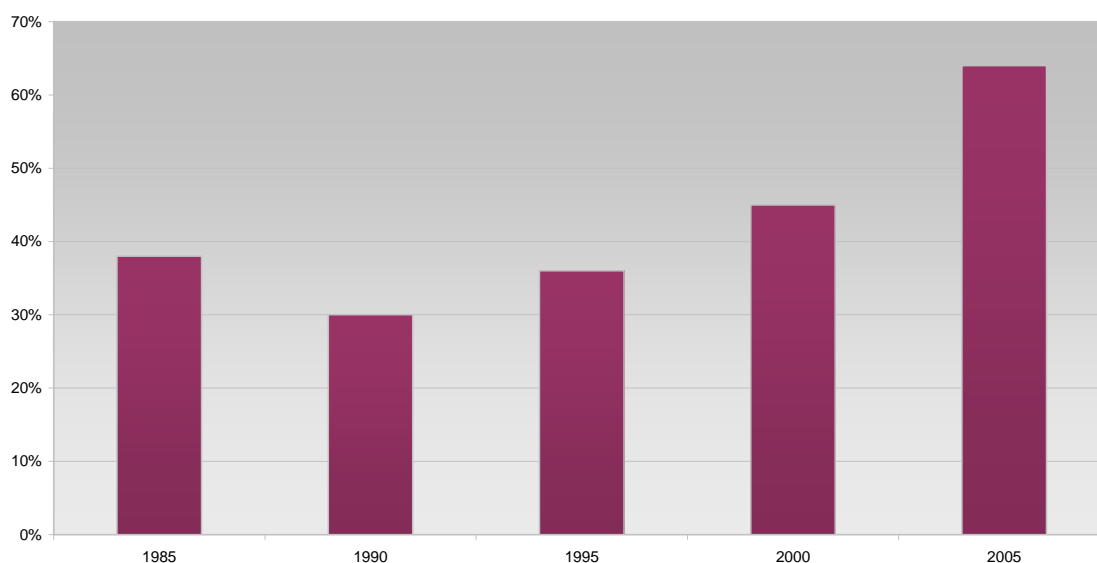
95 Ibid.

PUBLIC ATTITUDES

The majority of people consider gambling machines socially undesirable.

- The Department of Internal Affairs' national surveys of gambling conducted in 1985, 1990, 1995, 2000 and 2005 provide some indication of public attitudes over time.⁹⁶
- Over the period surveyed, New Zealanders had become increasingly concerned about the negative social impacts of gambling. There had been a steady increase in public awareness about problem gambling and the adverse impacts on individuals and the community.
- Those widely available forms most strongly linked to problem gambling in New Zealand (gambling machines, track betting and casino gambling) are also the forms of gambling that increasing proportions of adults regard as undesirable.
- In particular, the surveys found that the majority of respondents (64%) considered class 4 gambling machines to be socially undesirable.⁹⁷

**DIA Survey: Respondents' views on socially undesirable activities:
Non-casino gambling machines**



96 Department of Internal Affairs (2008) Peoples participation in, and attitudes to, gambling, 1985-2005. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/\\$file/GamblingParticipationSurvey1985-2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/$file/GamblingParticipationSurvey1985-2005.pdf)

- Only 1% of adults said that there were any additional forms of gambling that they would like to see in New Zealand. Nearly half of respondents (46%) felt that the number of gambling venues in their area was about right, a further 41% thought there were too many places, and only 1% thought there were not enough places to gamble in the area they lived in.
 - Most of the 41% of respondents who thought that there were too many places to gamble in their area said that there were too many gambling machine venues (87%), followed by TABs (20%), Lotto/Keno/Instant Kiwi outlets and casinos (both 14%).
 - Over three-quarters of adults said that there should be special laws controlling gambling.
 - Over half said preventing criminal activity was a relevant consideration.
 - Over a third mentioned restricting opportunities to gamble.
 - 72% of people believed the role of Government in addressing gambling harm should be extensive.
- Community perception studies undertaken by other territorial authorities also indicate that communities generally hold negative views on gambling, with specific concerns that communities are being seriously damaged by the growth of the gambling industry.⁹⁸
 - A Napier survey of residents (October 2009) showed that 82% think there are too many gambling machines.⁹⁹ A public survey in Nelson demonstrated overwhelming support for Councils having stronger powers to control the location and number of gambling machines.

97 Department of Internal Affairs (2008) Peoples participation in, and attitudes to, gambling, 1985-2005. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/\\$file/GamblingParticipationSurvey1985-2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/$file/GamblingParticipationSurvey1985-2005.pdf)

98 E.g. Nelson, Wanganui, Hastings, amongst others.

Support for tougher control on pokies. (2011 January 18). The Nelson Mail. Retrieved 29 January 2013 from <http://www.stuff.co.nz/nelson-mail/news/4552424/Support-for-tougher-controls-on-pokies>

Final results of referendum 10. (2010 October 9). Wanganui District Council Website. Retrieved 29 January 2013 from <http://www.wanganuireferendum.govt.nz/Results.asp>

McCracken, H. (2010 September 15). \$100,000 a day lost on pokies. Hawke's Bay Today. Retrieved 29 January 2013 from <http://www.hawkesbaytoday.co.nz/local/news/100000-a-day-lost-on-pokies/3922735/>

99 Napier City Council. (2009). Social Impact Assessment: Class 4 and TAB venues in Napier. Copy available upon request.

- Similarly, a 2010 referendum of 14,386 people in Wanganui resulted in 11,491 people (80%) supporting a reduction of gambling machines.
- Seventeen councils now have adopted a “sinking lid” policy; twenty-three have adopted a sinking lid or a district-wide cap that is below their existing number of venues and machines.¹⁰⁰ Hamilton is among those with a sinking lid, and this should be maintained.

National Outcomes

- The Ministry of Health Six-Year Strategic Plan (2010-2016)¹⁰¹ has not changed significantly since the first strategic plan for problem gambling (2004-2010). A sinking lid policy would be consistent with the first four of the ten Ministry objectives to minimise the harms of problem gambling:
 - To reduce health inequalities related to problem gambling
 - That people participate in decision-making about local activities that prevent and minimise gambling harm in their communities
 - That healthy policy at the national, regional, and local level prevents and minimises gambling harm
 - That government, the gambling industry, communities, family/ whānau and individuals understand and acknowledge the range of harms from gambling that affect individuals, families/whānau and communities.

100 The strongest sinking lid policies have been adopted by councils such as Auckland, Christchurch City and Kawerau; these policies ban new venues, new machines, and transfers of existing venues or machines. Weak sinking lids (sinking lids that don't explicitly forbid transfers of pokie machines) exist in Far North, Gisborne, Gore, Hamilton, Gisborne, Hastings, Horowhenua, Hamilton, Kaipara, Otorohanga, South Waikato, Thames-Coromandel, Waiora, Wanganui, and Whangarei.

It is also worth noting that in effect, Central Hawkes Bay, Hauraki, Lower Hutt, Rotorua, Taranaki, and Whakatane are currently practicing sinking lid policies; the caps they have set are lower than the current number of pokies in their council areas.

101 Ministry of Health. (2009) Preventing and minimising gambling harm 2010-2016 (Revised Final Draft): Consultation document; Six-year strategic plan; three-year service plan; problem gambling needs assessment; and problem gambling levy calculations. Wellington: MOH.

CONCLUSION

Suggested Policy

As stated at the beginning of this report, the Problem Gambling Foundation recommends that Hamilton Council maintain its “sinking lid” policy with a ban on any new class 4 venues and machines, and a ban on transfers.

It is also recommended that the TAB be restricted to two venues on the basis that venues containing pokies machines or other machines would not be consistent with the Hamilton City Council’s desire to reduce harm.

Closing Thoughts

- Gambling machines are not a harmless bit of fun for everyone. Gambling machines are addictive and dangerous machines, with harms that have dire consequences in Hamilton. The monetary benefits from gambling are small relative to the high social and health costs which affect communities, families/whanau and individuals.
- Given that access to gambling is necessary for the development of problem gambling, reducing access is key to a public health approach. From a public health perspective, there are already too many gambling machines in Hamilton. Relocations do not reduce the number of machines and undermine the effect of a “sinking lid” policy. So too does the opening of TAB venues that contain machines. The Problem Gambling Foundation urges that the Hamilton City Council maintains its “sinking lid” policy without relocations as an important part of the gradual reduction of gambling machine harm in Hamilton.