



**WHANGANUI
DISTRICT COUNCIL**
Te Kaunihera a Rohe o Whanganui

Proposed Gambling Venues Policy

Submissions

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 <p>WHANGANUI DISTRICT COUNCIL Te Kaunihera a Rohe o Whanganui</p>	<p>Submission: Gambling Venues Policy</p>
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Submissions close 5.00pm Friday 20 November 2020

Privacy statement: Please be aware when providing personal information that this submission form is part of the public consultation process. As such, this document (including contact details) will be copied and made publicly available. Personal information will be used for the administration of this consultation process and decision-making. All information will be held by the Whanganui District Council, 101 Guyton Street, and submitters have the right to access and correct personal information.

Online: You can complete this submission online at www.whanganui.govt.nz/haveyoursay

Alternatively, please return this form, or send your written submission to:

Review of Gambling Venues Policy
 Whanganui District Council
 101 Guyton Street
 Whanganui 4500

Email: policysubmissions@whanganui.govt.nz

YOUR DETAILS (please print your details clearly)

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Organisation: If you are completing this submission on behalf of an organisation please name the organisation and your role: Public Health Centre - Whanganui District Health Board

Oral submissions

If you wish to speak to Council in support of your written submission please tick the box below.

- Yes I would like to speak in support of my submission (*please ensure you have completed the details above, including contact **phone number***)

Note: Hearings will be in early December 2020. If you have indicated that you wish to speak on your submission we will contact you to arrange a time.

If you would be interested in being involved in further consultation opportunities with Council please tick the box below and ensure your contact details have been completed.

Yes I would like to be involved in future consultation and am happy for you to retain my contact details.

Thank you for your submission

Gambling Venues Sub: 001

Please indicate your level of agreement with the following proposals presented in review of the Gambling Venues Policy.

KEY ISSUES	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Class 4 (Pokies) Gaming and Tab Venues					
<p>Retain existing sinking lid policy</p> <p>This would mean that Council continues its existing policy and that no additional electronic gaming machines or venues would be established.</p>	✓				
<p>Please provide reasons for your response</p>	<p>This policy supports the following objectives:</p> <p>1. Control the growth of gambling</p> <p>2. Contribute to the minimization of harm caused by gambling</p> <p>.....</p> <p>.....</p> <p>.....</p>				
Form of the Policy					
<p>That the drafting of the existing policy be improved by:</p> <ul style="list-style-type: none"> Closing existing gaps; Updating the structure; and Updating definitions, <p>to make it clearer and more consistent.</p>	✓				
<p>Please provide reasons for your response?</p>	<p>The amendments to the drafting of the existing policy will bring it into line with the Council's current strategic framework and increases its clarity and consistency.....</p> <p>.....</p> <p>.....</p> <p>.....</p>				

Thank you for your submission

Gambling Venues Sub: 001

Please use this space to provide reasons for your responses to the above and to provide further comments regarding the review of the Gambling Venues Policy. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative options you may have:

"Gambling harm is often hidden, but can be recognised in poverty and loss of savings, damage to mental health, susceptibility to other addictive behaviours, crime, violence, broken down relationships, and poor performance in study or at work." - 2020 Gambling Venues Policy Review Statement of Proposal.

People who develop gambling disorders earlier in life tend to have problems with substance abuse or impulsivity disorders according to the American Psychiatric Association (2013). Furthermore, several risk factors were identified to be related to gambling addiction which includes:

- > Substance abuse history - People with a substance abuse disorder are more likely to have a gambling disorder. Alcohol use disorder are particularly common in people who are diagnosed with a gambling addiction.
- > Genetics - Gambling disorders are more common among first degree-relatives of people diagnosed with a moderate or severe alcohol use disorder than in general population.

In addition to this, Josephson et. al (2016) suggested that there are high rates of comorbidity between substance use disorders and gambling addiction with just over 73% of people in the study that were diagnosed with gambling addiction also had an alcohol use disorder. The research also tells us that alcohol disorders have been found to have the greatest link to gambling addiction with alcohol being served at most casinos.

References:

American Psychiatric Association, (2013). Diagnostic and statistical manual of mental disorders (5th ed.)
Arlington, VA: American Psychiatric Publishing.

Josephson, H., Carlbring, P., Forsberg, L., & Rosendahl, I. (2016). People with gambling disorder and risky alcohol habits benefit more from motivational interviewing than from cognitive behavioral group therapy. PeerJ 4, e1899.

Thank you for your submission

OPTIONAL:

Have you submitted to Council before? (Circle one)

Yes No

Gender: Female Male Another gender (specify if you feel comfortable)

.....

Age: Under 18 Years 18 – 29 years 30 – 39 years 40 – 49 years
50 – 59 years 60 years and over

Location: (tick one)

- Aramoho (Lower Aramoho, Upper Aramoho)
 - Bastia Hill / Durie Hill
 - Blueskin- Maxwell
 - Castlecliff (Castlecliff North, Castlecliff South, Mosston)
 - Fordell-Kakatahi
 - Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
 - Marybank-Gordon Park
 - Putiki
 - St Johns Hill / Otamatea
 - Springvale (Springvale West, Springvale East, Mosston)
 - Whanganui Central (Laird Park, Whanganui Central, Whanganui Collegiate)
 - Whanganui East (Williams Domain, Wembley Park, Kowhai Park)
 - Other
-

Ethnicity: (circle all that apply)

- NZ European Maori Asian Pacific Peoples
- Middle Eastern/Latin American/African
- Other

Thank you for your submission



Whanganui District Health Board

Position statement on alcohol

October 2019

Introduction

The following document is Whanganui District Health Board's view on alcohol and alcohol-related harm. It uses evidence and policies gathered locally, nationally and internationally to show where we stand on alcohol harm minimisation in our community and how we will help reduce it through our health services and promotion.

Alcohol in our communities

Alcohol is not an ordinary commodity (Babor, 2010). It is an intoxicant, toxin, and addictive psychotropic drug. Alcohol has been normalised and largely accepted by society, and causes more harm than any other drug in society (Nutt et al., 2010). Hazardous alcohol use contributes to large physical and mental ill-health, social, and economic burdens in New Zealand with impacts extending across sectors (Ministry of Health, 2016). Harm from alcohol extends beyond the individual and can result in harm to children (including those exposed to alcohol during pregnancy), whānau, friends, and the wider community (Connor et al., 2012).

In New Zealand, inequitable outcomes are apparent in men, Māori, young people, and those living in more socioeconomically deprived areas, who are all at higher risk of alcohol-related harm (Meiklejohn et al., 2012). The harmful health impacts of hazardous alcohol use in New Zealand are divided almost equally between injury and chronic disease relating to alcohol abuse in both inpatient and outpatient hospital services, and in primary care services in the community. Alcohol-related health conditions are not confined to the minority of people who experience alcohol dependence (The New Zealand Law Commission, 2010). Even low consumption increases the risk of some chronic conditions such as breast cancer (Key et al., 2006).

The following issues were identified in [Whanganui District Council's Provisional Local Alcohol Policy](#)

- 99% of respondents reported that Whanganui has too many or enough liquor outlets.
- Many respondents said there should be more control over where alcohol can be purchased in the community. 90% of respondents believe that there should be restriction on how close outlets that sell alcohol should be to preschools, kindergartens, primary and secondary schools.
- In 2014, 18.7% of residents (compared to the New Zealand average of 15.5%) identify themselves as a hazardous drinker.
- Whanganui's population is more prone to alcohol related harm (this is because 22% of the district's population identify as Māori, 7.4% are aged 18 to 24, and 39% experience high degrees of deprivation).
- When contrasting on and off-licence closing hours to Emergency Department (ED) presentations, more alcohol-related ED presentations occur in conjunction with the availability of alcohol and the closing times of on and off-licence outlets.
- Alcohol-related chronic disease admissions for the most part have been relatively steady across 2013 to 2015 for both discharge and patient counts.
- Deaths and injuries where alcohol was deemed a contributing factor are on the increase.
- In 2015, 45% of alcohol and other drug referrals have a diagnosis of Alcohol Use Disorder.
- Over the last five years, Police actions undertaken where a person is found intoxicated in public (drunk custodies) peak between 1am to 1:59am, coinciding with the final hour of trade for off-licences.
- Police data indicates that alcohol was a factor in 19% of all family violence cases attended during 2014/15 and 2015/16.
- Where there is a concentration of licences, and the relatively higher availability of alcohol (Central Whanganui, Whanganui East, Aramoho, Gonville and Castlecliff), there is also a higher frequency of violence events and drunk custodies than in areas where there is a lesser concentration of licences and relatively less availability of alcohol.
- 15% of the total vehicle crashes recorded for the Whanganui district in 2014 were alcohol-related.

WDHB Position statement on alcohol

1. We support a broad and comprehensive package of evidence-based strategies that prevent and reduce hazardous alcohol use and alcohol-related harm including:

- restricting the availability of alcohol
- increasing the minimum legal purchase age
- increasing the price of alcohol
- reducing alcohol advertising, promotion and sponsorship
- increasing drink driving countermeasures
- increasing treatment options for harmful alcohol use.

2. We support equitable access to appropriate healthcare services including assessment for hazardous alcohol use, brief and early intervention, and referral to treatment when indicated.

3. We support collection and reporting of alcohol-related health presentations within the Whanganui District Health Board (WDHB) region in a consistent manner and provision of assistance with regulatory issues, as required.

4. We support providing health promotion activities with a focus on addressing and reducing alcohol-related harm in the Whanganui District Health Board region through:

- working with Territorial Authorities (local councils) to develop and implement Local Alcohol Policies and other licensing issues
- making submissions to liquor licence applications and policies concerning alcohol. This requires that our Health Protection Service communicates with WDHB regarding new licence applications
- strengthening intersectoral collaboration and engagement to deliver coordinated alcohol-related harm reduction approaches and treatment strategies
- promoting awareness of alcohol-related harm before, during and after pregnancy to reduce the risk of Fetal Alcohol Spectrum Disorder
- supporting and encouraging research and evaluation to ensure interventions targeting hazardous alcohol use and alcohol-related harm are effective and equitable
- promoting alcohol harm reduction amongst WDHB staff, including education and services available for treatment and support
- choosing not to advertise and promote alcohol and not accepting sponsorship from alcohol companies.

Rationale for our position

Hazardous and harmful alcohol use is identified as a major contributor to inequities and is amenable to healthy public policy (Wilkinson et al., 2003). Each of the evidence-based strategies below is identified as an area for national action in the World Health Organization 2010 global strategy to reduce the harmful use of alcohol.

1. Equitable prevention of hazardous alcohol use and alcohol-related harm

- **Restricting the availability of alcohol**
Increased alcohol outlet density is associated with increased alcohol-related harm (Connor et al., 2011). Alcohol outlets are inequitably distributed in New Zealand with more alcohol outlets situated in socioeconomically deprived areas further contributing to the unequal distribution of harm (Hay et al., 2009). There is strong evidence pertaining to the beneficial effects of reduced trading hours on alcohol-related harm (Popova et al., 2009).
- **Increasing the minimum legal purchase age**
Young people are more vulnerable to alcohol-related harm than other age groups. Alcohol use during mid-to-late adolescence is associated with impacts on brain development (Luciana et al., 2013). Raising the purchase age reduces adolescent access to alcohol, reduces harmful youth drinking, and raises the age at which young people start drinking.
- **Increasing the price of alcohol**
Raising alcohol prices is internationally recognised as an effective way to reduce alcohol-related harm (Wagenaar et al., 2010). Policies that increase the price of alcohol delay the start of drinking, reduce the volume consumed per occasion by young people, and have a greater effect on heavy drinkers (Anderson et al., 2009).
- **Addressing alcohol advertising, promotion and sponsorship**
Alcohol advertising and promotion increases the likelihood that adolescents will start to use alcohol and drink more if they are already consuming alcohol. Advertising and promotion also makes it more difficult for hazardous users of alcohol to abstain (Thomson et al., 1997).
- **Drink driving countermeasures**
The risk of motor vehicle accidents increases exponentially with increasing alcohol consumption (Taylor et al., 2010). In New Zealand, it has been estimated that over a quarter of road traffic injuries across all road user groups involve alcohol. Laws setting a low level of blood alcohol concentration at which one may drive legally and well-publicised enforcement significantly reduce drink-driving and alcohol-related driving fatalities.
- **Increasing treatment options for harmful alcohol use**
The cumulative evidence from more than 100 randomised controlled trials conducted to evaluate the efficacy of brief interventions shows that clinically significant reductions in drinking and alcohol-related problems can follow from this kind of intervention (Babor et al., 2010). In addition to this, mutual help groups are often used as a substitute or as an adjunct to treatment and can have incremental effect when combined with formal treatment, and attendance alone may be better than no intervention.

2. Equitable access to appropriate healthcare services

Assessment, brief advice, and referral to specialist services when indicated in healthcare settings reduce hazardous drinking and alcohol-related harms (O'Donnell et al., 2014).

3. Collection and reporting of alcohol-related presentations on hazardous alcohol use and alcohol-related harm

Robust data is needed to accurately describe the burden from alcohol, inform decisions on what strategies and initiatives we need to develop and fund, and to support our community and partners in the sector with their alcohol data needs.

4. Continue to promote health activities with a focus on addressing and reducing alcohol-related harm in the Whanganui DHB region.

Health promotion is the process of enabling people to increase control over, and to improve, their health. Health is a positive concept emphasising social and personal resources, as well as physical capacities. Health promotion is not just the responsibility of the health sector, but goes beyond healthy lifestyles to wellbeing (Ottawa Charter, 1986).

Policy and legislation which supports our statement

The WDHB's position on alcohol in our communities has been developed in the context of the [National Drug Policy](#), which sets out the Government's approach to alcohol and other drug issues, with the overarching goal of minimising alcohol and other drug harm, and promoting and protecting health and wellbeing.

Additionally, the principles of Te Tiriti o Waitangi and the United Nations Declaration on the Rights of Indigenous Peoples mean comprehensive strategies must be developed to address longstanding inequities in alcohol-related harm between Māori and non-Māori.

The National Drug Policy

The policy frames alcohol and other drug (AOD) problems as, first and foremost, health issues. The policy aims to minimise AOD-related harm and protect health and wellbeing by delaying the uptake of AOD by young people, reducing illness and injury from AOD, reducing hazardous drinking, and shifting attitudes towards AOD.

Evidence-based strategies included in the policy are:

Problem limitation

- Reduce harm that is already occurring to those who use AOD services or those affected by someone else's AOD use through safer use, ensuring access to quality AOD treatment services, and supporting people in recovery.
- Protect the most vulnerable members of our community when it comes to alcohol-related harm including children and young people, pregnant women and babies (Fetal Alcohol Spectrum Disorder).

Demand reduction

- Reduce the desire to use AOD through education, health promotion, advertising and marketing restrictions, and influence conditions that promote AOD use.

Supply control

- Prevent or reduce the availability of AOD through border control, supply restrictions, licensing conditions and permitted trading hours.

The Sale and Supply of Alcohol Act 2012

This Act, which replaces the Sale of Liquor Act 1989, adopts a harm minimisation approach. Its adoption followed a lengthy review by the Law Commission which recommended greater restrictions to the sale and supply of alcohol. Compared to the previous Act, alcohol-related harm is more broadly defined as both direct and indirect harm to an individual, society or the community caused by the excessive or inappropriate consumption of alcohol. The Act provides for Territorial Authorities (local councils) to develop and implement a Local Alcohol Policy (LAP).

The aim of a LAP is to minimise alcohol-related harm through controlling the local availability of alcohol. Ideally, they should address local concerns and target inequities in alcohol-related harm. LAPs are drafted in consultation with the Police, alcohol licensing inspectors, and Medical Officers of Health, with community input.

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- World Health Organization, 2014. *Global status report on alcohol and health 2014*. Geneva: World Health Organization.

From: [Whanganui District Council](#)
To: bob.w.davies@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 22 October 2020 6:35:26 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	592100635202522
First name	Bob
Last name	Davies
Email address	bob.w.davies@gmail.com
Postal address	6 TULLOCH STREET SAINT JOHNS HILL WHANGANUI 4500
Daytime phone number	021803744
Organisation name	Sailing WHANGANUI and Sailability Whanganui
Your role	Treasurer for both
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	60 years or over
Ethnicity	NZ European
Location	St Johns Hill / Otamatea
Would you be interested in being involved in further consultation opportunities with Council?	Yes

KEY ISSUES	
<p>Current Policy</p> <p>That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly disagree
Please provide reasons for your response	Council should include Lotto outlets and investigate the monies that go thru these outlets.
<p>Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Agree
Please provide reasons for your response	Clear definition is important.
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	Both the Sailing Club and the Sailability Trust WOULD NOT EXIST BUT FOR THE COMMUNITY TRUST GRANTS.
Supporting documents	File(s) not provided
I would like to speak in support of my submission	Yes
Submission method	Online

The Gaming Machine Association of New Zealand's Submission on Whanganui District Council's Gambling Venue Policy



Contact Persons:

Jarrold True

Counsel

Gaming Machine Association of New Zealand

jarrod.true@truelegal.co.nz

027 452 7763

The Gaming Machine Association of New Zealand’s Submission on Whanganui District Council’s Gambling Venue Policy

Introduction

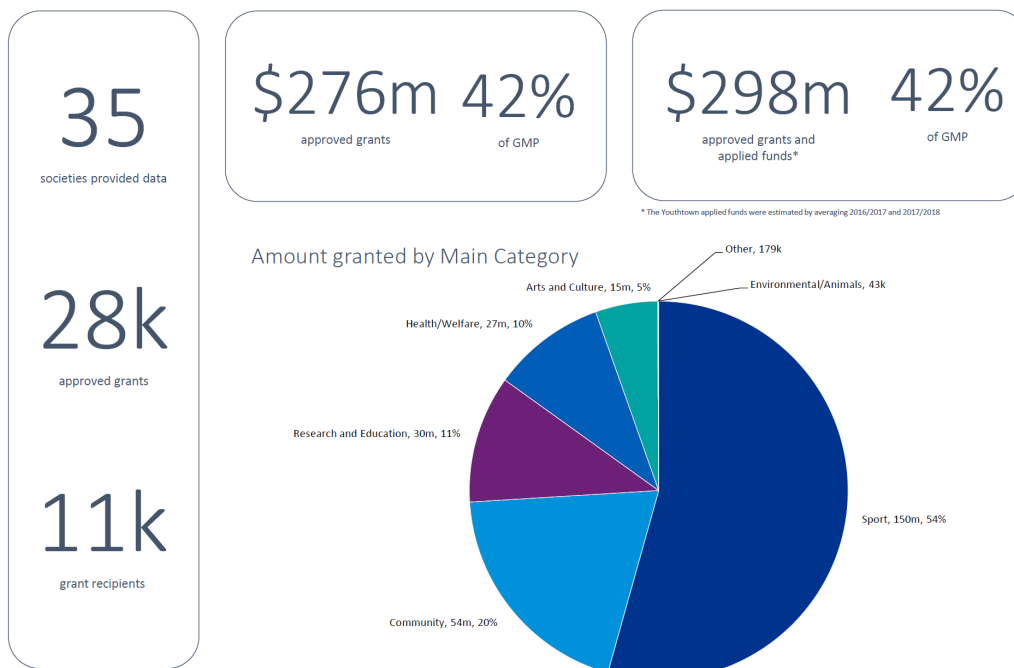
1. The Gaming Machine Association of New Zealand represents the vast majority of the gaming machine societies that operate in New Zealand. The Association wishes to provide council with pertinent information regarding gaming machine gambling to help council to make a balanced, evidence-based decision.

Summary

2. The Association asks that the sinking lid be replaced with a cap at current numbers (208 gaming machines).

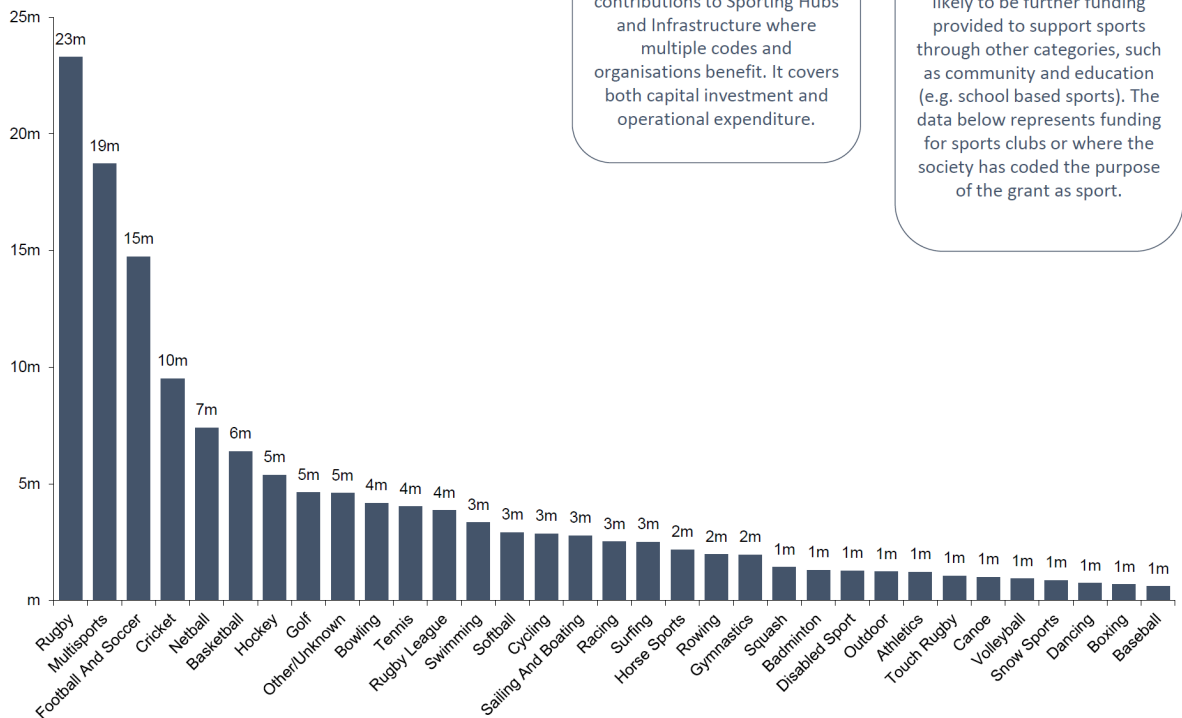
Gaming Machine Funding

3. 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 2018, approximately \$276m of grant funding was approved across 28,074 grants to 10,853 different organisations.¹ In addition, over \$71m was applied by TAB New Zealand (\$14m), Youthtown (\$8m) and various RSAs and Workingmen’s Clubs (\$50m) to support their own activities. In total, 54% of the grants distributed in 2018 were sports-related. The second most popular category was community (20%). This funding is crucial.



¹ http://www.gamblinglaw.co.nz/download/Gaming_Machine_Grant_Data_2018.pdf

Amount granted by Sport



The 'Multisports' categorisation includes contributions to Sporting Hubs and Infrastructure where multiple codes and organisations benefit. It covers both capital investment and operational expenditure.

In addition to the sports represented below, there is likely to be further funding provided to support sports through other categories, such as community and education (e.g. school based sports). The data below represents funding for sports clubs or where the society has coded the purpose of the grant as sport.

4. The total authorised purpose funding (including the non-published club authorised purpose payments) received from Whanganui District-based venues in 2019 was over \$3 million.

5. The external grants made in 2019 totalled \$1,571,631.00. There were 176 grants made to 118 different community groups. The grant breakdown by society was as follows:

NZCT	\$909,863.00
The Lion Foundation	\$421,666.00
Infinity Foundation	\$159,424.00
TAB New Zealand	\$60,065.00
Pub Charity	\$1,310.00
Pelorus Trust	\$5,000.00
One Foundation	<u>\$14,303.00</u>
Total	\$1,571,631.00

6. In the 2019/20 financial year, \$1,525,785.00 in gaming funding was used by the four local clubs to support their members. The gaming funding breakdown by club was as follows:

Castlecliff Club	\$281,612.00
------------------	--------------

Wanganui Cosy Club	\$102,285.00*
St John's Club	\$914,125.00
Wanganui East Club	<u>\$227,763.00*</u>
Total	\$1,525,785.00

* Authorised purpose return estimated based on the club's legal minimum of 37.12%.

7. Examples of recent local grants include:

\$10,000.00 to Wanganui Competitions Society



\$20,000.00 to Hockey Wanganui Incorporated



\$40,000.00 to Koriniti Marae Maori Reservation Trust



\$11,220.00 to Union Boat Club Incorporated



\$10,000.00 Wanganui Group of the Riding for the Disabled Association



\$4,000.00 to West Coast Bombers Alternative Skate League Incorporated



\$5,000.00 to Whangaehu School



\$7,000.00 to Whanganui High School



8. The total grants amount quoted by the Problem Gambling Foundation is less than the amount stated above, as the Problem Gambling Foundation’s data is gathered from society websites, and not all societies publish their authorised purpose payments. The funds applied and distributed by club societies, for example, are not published. Further, if the grant recipient’s name does not indicate that it is located within the territorial authority, the amount of that grant is not included in the Problem Gambling Foundation’s figures.

Other Benefits from Gaming

9. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2018 Health and Lifestyles Survey² found that 67.2% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,650,000 adults).
10. In the 2019 calendar year, Whanganui-based non-casino gambling contributed \$3.86 million to the government by way of taxes, duty and levies.
11. In the 2019 calendar year, the gaming machine industry paid approximately \$1.72 million to Whanganui-based hospitality businesses, thus supporting local employment and business growth.

Revenue Breakdown

12. The return to players on a non-casino gaming machine is required to be set between 78% and 92%, with most being set at 91.5%. On average, for every \$1.00 gambled, 91.5 cents is returned to the player in winnings. The money retained is typically allocated as follows:

Typical Distribution of Gaming Machine Profits

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	0.78%	0.90%

² <https://kupe.hpa.org.nz/#!/gambling/gambling-participation/any-gambling-activities>

DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.83%	43.5%

Gaming Machines – Key Facts

13. 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, 32 years ago.
14. Gaming machine numbers are in natural decline. In 2003, New Zealand had 25,221 gaming machines. In June 2020, New Zealand had 14,847 gaming machines.
15. Gaming machine numbers in Whanganui have already reduced considerably:
 - 2003: 291 gaming machines.
 - 2013: 257 gaming machines.
 - 2020: 208 gaming machines.
16. New Zealand has a very low problem gambling rate by international standards. The New Zealand National Gambling Study: Wave 4 (2015)³ found the problem gambling rate was 0.2% of people aged 18 years and over. The problem gambling rate is for all forms of gambling, not just gaming machine gambling. Based on Whanganui's population this is 91 people.
17. The Ministry of Health records the number of people who seek help for problem gambling from each territorial authority. This includes the people who use the helpline, text service, or obtain face-to-face counselling. In the year July 2017 to June 2018 (the most recent data available) only 7 new persons from Whanganui District sought help for problem gambling (less than one person per month).
18. All gaming machine societies contribute to a problem gambling fund. This fund provides approximately \$20 million 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.
19. 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 Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

³ <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf>

Existing Gaming Machine Safeguards

20. Replacing the sinking lid with a cap is appropriate given the significant measures that are already in place to minimise the harm from gaming machines.
21. 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.
22. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
23. 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.
24. 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. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.
25. Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
26. ATMs are excluded from all gaming rooms.
27. All gaming venues have a harm minimisation policy.
28. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
29. All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.
30. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
31. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
32. It is not permissible for a player to play two gaming machines at once.
33. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
34. 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).

35. It is not permissible to use the word “jackpot” or any similar word in advertising that is visible from outside a venue.

Burden of Harm Report

36. In May 2017, a report titled *Measuring the Burden of Gambling Harm* was produced for the Ministry of Health. In the report, “low risk” gambling, such as buying a Lotto ticket, was claimed to be as bad for a gambler’s health as the untreated amputation of a leg, while “problem gambling” was claimed to be as bad as suffering from a severe stroke or terminal cancer.
37. A review of the study’s methodology produced by TDB Advisory⁴ concludes that these outlandish comparisons were made possible by a long line of deliberate selection biases and errors. The errors revealed by the TDB Advisory review include either deliberately or by mistake: using a biased population sample (participants were not randomly selected); attributing all harms to gambling and none to associated behaviours (such as smoking); and treating all harm as stemming 100% from gambling rather than allowing for the use of gambling as a coping mechanism or as a symptom of harms rather than the cause.
38. The Association has called for the report to be officially withdrawn, or to be subject to an official warning against its use.

A Concern with How Gamblers Spend their Disposable Income

39. The Salvation Army and Problem Gambling Foundation recently released a report commissioned from the New Zealand Institute of Economic Research suggesting that there would be significant economic benefit to the retail sector in both income and job creation if spending on gambling was halted. The report claims that this extra retail spending would generate an additional 1,127 full-time equivalent jobs for 1,724 workers, along with an additional \$58m of GST revenue and additional income tax of \$7m from the retail spend.
40. The report, however, fails to take into consideration the economic value currently generated by the gambling sector. The report specifically acknowledges that this was outside its scope. It is therefore a misrepresentation of the net value of such a move, given that it takes no account of the value that would be lost. What the Salvation Army and Problem Gambling Foundation appear to be saying is: let’s take money – and jobs – away from the charity and not for profit sectors – health and rescue, education, community and social support services, environment, and arts and heritage – and give it to the commercial sector.
41. A suggestion is also made that the increased retail spending would then result in the retail sector channelling their increased profits into things like sports sponsorship. It is,

⁴ http://www.gamblinglaw.co.nz/download/TDB_Advisory_Report.pdf

however, more likely that any increased profits from the retail spending would be retained by the business owners, many of whom are large corporates, based offshore.

42. The report fails to address the freedom of adult New Zealanders to do what they want with their discretionary spending. Ministry of Health data indicates that over 1.8 million adult New Zealanders enjoy spending their money on gaming machines, Lotto, Instant Kiwi, sports and track betting and other forms of gambling. That spending provides them with entertainment, relaxation and social interaction. Those benefits would be lost if people were not able to spend their money on gambling.

The “Costs of the System”

43. The Problem Gambling Foundation has also recently suggested that 60% of the revenue from gaming machines goes towards the costs of running the system (with the remaining 40% being the returns to the community). In fact, the community benefit is much more like 80%, with the approximately 40% share that makes up the various taxes, duties and GST in effect also being a community contribution, going into the public purse to contribute to public good. The actual ‘running of the system’ is only about 20%. This 20% represents money to businesses – local hospitality businesses, trusts, equipment providers and technicians – and a significant number of jobs in our cities, towns and communities.

A Cap at Current Numbers is Reasonable

44. A cap at current numbers (208 machines) is reasonable, given the current environment of high regulation and naturally reducing machine numbers.
45. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last ten years, the problem gambling rate has remained the same, despite gaming machine numbers declining rapidly (4,618 gaming machines have been removed from the market).
46. The 2012 National Gambling Survey⁵ 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.

⁵ http://www.health.govt.nz/system/files/documents/pages/national_gambling_study_report_2.pdf

47. The New Zealand National Gambling Study: Wave 3 (2014)⁶ noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

In contrast to the 1990s, there is no evidence that problem gambling prevalence decreased with decreasing participation rates during the 2000s. When methodological differences between studies are taken into account, it appears that problem gambling prevalence has remained much the same during the past 10 to 15 years.

...gambling participation has decreased substantially in New Zealand during the past 20 years, and problem gambling and related harm has probably plateaued...

48. Professor Max Abbott is New Zealand's leading expert on problem gambling. In 2006, Professor Abbott published a paper titled *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 Abbott noted:

EGM reductions and the introduction of caps generally appear 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).

49. The current sinking lid is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups in the Whanganui District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, 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.

Unintended Consequences – Increase in Internet and Mobile Phone Gambling

50. 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.

⁶ <http://www.health.govt.nz/system/files/documents/pages/national-gambling-study-final-report-report-no.5.pdf>



51. 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 you desire, including an exact replica of the gaming machine programs currently available in New Zealand venues.
52. There is no question that New Zealanders love gambling online. The Lotteries Commission reported in its 2017/18 Annual Report that online sales accounted for 16 per cent of its total sales (\$201.1m), compared with 13 per cent the previous year.
53. The New Zealand Racing Board noted in its latest six-monthly report that online channels made up 59.2 per cent of its betting turnover, up 2.2 percentage points on last year. It also said that its online platforms were the fastest-growing channels.
54. SkyCity has launched an offshore-based online casino with a large selection of gaming machine games.

Welcome to SkyCity Online Casino!
 100% UP TO \$100
 + 10 FREE SPINS PER DAY FOR 7 DAYS

SIGN UP NOW

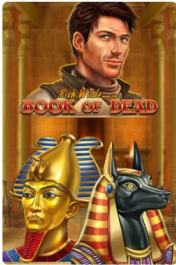

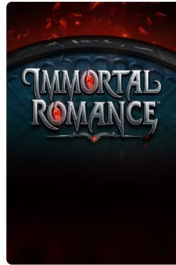



Opt in required. Offer valid on first deposit only. Bonus 100% up to a max of \$100. 35x bonus wagering req. in 30 days. 70 free spins awarded on eligible games, 10 per day valid for 24h.

Game weighting and T&Cs apply

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Slots

					
Book of Dead	Starburst	Immortal Roman...	Wild Wheel	300 Shields	Sizzling Spins

55. A September 2018 Cabinet paper⁷ on online gambling cites research suggesting that New Zealanders gambled approximately \$300 million with offshore providers in 2017, with the market growing annually at between 12 and 20 per cent.
56. The Cabinet paper notes that health professionals and gambling harm treatment providers have expressed concern that online gambling may be more harmful than some existing forms of gambling. The paper continues by stating “It [online gambling] has the potential to drive changes in behaviour to a greater, and more harmful, extent than some land-based gambling.”
57. Offshore-based online gambling poses considerable risks because it:
- Is highly accessible, being available 24 hours a day from the comfort and privacy of your home;

⁷ http://www.gamblinglaw.co.nz/download/Online_gambling_Cabinet_paper.pdf

- Has no restrictions on bet sizes;
 - Has no capacity for venue staff to observe and assist people in trouble;
 - Reaches new groups of people who may be vulnerable to the medium;
 - Provides no guaranteed return to players;
 - Is more easily abused by minors;
 - Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and
 - Is unregulated, so 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.
58. Offshore-based online gambling does not generate any community funding for New Zealanders, does not generate any tax revenue for the New Zealand Government, and does not make any contribution to the New Zealand health and treatment services as no contribution is made to the problem gambling levy.

Oral Hearing

59. Jarrod True, on behalf of the Gaming Machine Association of New Zealand, would like to make a presentation at the upcoming oral hearing.

6 November 2020

Jarrod True

Counsel

Gaming Machine Association of NZ

jarrod.true@truelegal.co.nz

027 452 7763

gmanz.org.nz

From: [Whanganui District Council](#)
To: danny@sportwhanganui.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Tuesday, 10 November 2020 7:38:41 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	192110738204010
First name	Danny
Last name	Jonas
Email address	danny@sportwhanganui.co.nz
Postal address	PO BOX 516 WHANGANUI WHANGANUI 4541
Daytime phone number	027 224 2270
Organisation name	Sport Whanganui
Your role	CEO
Have you submitted to the Whanganui District Council before?	Yes
Gender	Male
Age group	50 - 59 years
Ethnicity	NZ European
Location	Springvale (Springvale West, Springvale East, Mosston)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

KEY ISSUES	
<p>Current Policy</p> <p>That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly disagree
Please provide reasons for your response	It would be extremely difficult to obtain replacement funding. This would result in the approximate loss of 2 FTE's to the organisation. A reduction in resourcing (staff) would impact on getting our community more Active, Healthy and Connected.
<p>Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Neither agree nor disagree
Please provide reasons for your response	
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	Strongly oppose the sinking lid policy and request a cap at current numbers. This will help retain the current funding to continue going into our community.
Supporting documents	File(s) not provided
I would like to speak in support of my submission	Yes
Submission method	Online

From: [Whanganui District Council](#)
To: rachel@nzmg.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 11 November 2020 9:20:34 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	930110920203311
First name	Rachel
Last name	O'Connor
Email address	rachel@nzmg.com
Postal address	PO Box 516 Whanganui 4541
Daytime phone number	063492321
Organisation name	Whanganui (NZ) Masters Games Trust
Your role	Games Manager
Have you submitted to the Whanganui District Council before?	Yes
Gender	Female
Age group	30 - 39 years
Ethnicity	NZ European
Location	Whanganui East (Williams Domain, Wembley Park, Kowhai Park)
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly disagree</p>
<p>Please provide reasons for your response</p>	<p>The New Zealand Masters Games would suffer significant financial loss if grant funding from Class 4 funders was to cease, now or in the future.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Neither agree nor disagree</p>
<p>Please provide reasons for your response</p>	
	<p>The New Zealand Masters Games is a locally owned event (49% owned by Whanganui District Council) which has taken place every two years in Whanganui, since 1989. This event attracts over 4,000 participants (60% of whom are from out of the region) and brings in around \$3million in economic benefit to the City over the 10 day event. The New Zealand Masters Games is a collaboration of 56 local sports clubs and generates over \$130,000 in revenue for the Clubs each event. The event has a commercial naming partner, as well as over 40 corporate financial partners of varying levels, and in-kind support across the board. Our commercial partnerships contribute to 14% of our total income, and grant funding (including Class 4 funders) contribute to 18%. Because of this, it means our registration fee can</p>

Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:

be kept low for the participant, which contributes 40% towards total income. The current cost to our participants to register is \$65. Without grant funding, this would increase to over \$200 per participant and become a huge barrier for participation, and likely see the event cease operating as it would not be financially viable to continue. The funding we receive from NZCT and The Lion Foundation is critical to event delivery, and ensures we have resources and equipment required to run a successful event. The New Zealand Masters Games exists to provide an opportunity for participation in masters sport and a chance for participants to compete, connect and celebrate with other across the Country. The Trust secure extensive commercial partnerships, funding and sponsorships as it is, and it would be extremely difficult to obtain replacement funding should Class 4 funders not exist. Quite simply, the future of the New Zealand Masters Games would be in huge jeopardy should Class 4 grant funding not be available in the Whanganui region.

Supporting documents	Swimming Pic.jpg - Received
I would like to speak in support of my submission	Yes
Submission method	Online



From: [Whanganui District Council](#)
To: darrellandang@xtra.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 11 November 2020 10:00:13 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	895111000201211
First name	Darrell
Last name	Robinson
Email address	darrellandang@xtra.co.nz
Postal address	29 HEREFORD STREET SPRINGVALE WHANGANUI 4501
Daytime phone number	0272235922
Organisation name	Kaierau rugby football club
Your role	Chairman
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	50 - 59 years
Ethnicity	NZ European
Location	Springvale (Springvale West, Springvale East, Mosston)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

KEY ISSUES	
<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p style="text-align: center;">Strongly disagree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>If we continue with Sinking Lid policy our funding ability to run our club would reduce over time. Gaming machines have been an important part of our survival not only for Rugby (Premier,Junior kids),Netball and Kickstart but also for our community. Our club has a large diversity of members totalling over 550 members and supporters across all codes. Funding gives us the oppuntinity to help subsidise memberships, suppling uniforms, bus travel for games, insurance and rates, upgrading of facilities all of these are applied for yearly to allow all families to particpate in sport, if we see a reduction of gaming machines in our area this could have a adverse effect of participation in our club therefore less adults, children being involved in sport and more likely the closing of our club of 128 years. Approx 5 years ago we were lucky enough to receive funding for a community gym at Kaierau Rugby club, this was not only for the use for our rugby players, but also in conjunction with Rivercity Boxing it gave us the opputunity to help the community with get fit classes, over weight classes, junior fitness, classes for those with Alziemers,these are being run by Rivercity Boxing on a oily rag and helping so many people in our Wanganui community, if funding to our organisation and Rivercity Boxing these programs would seize.</p>
<p style="text-align: center;">Updates to the Policy</p>	

<p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Agree</p>
<p>Please provide reasons for your response</p>	<p>This policy should be changed to allow no further reductions in gaming machines in this area, as this will ultimately reduce funding to all sports groups, arts, health care in our area. Sinking lid should be removed and allow the current quantity of machines to stay in place. eg if a venue closes machines should be allowed to be transferred to another venue or passed onto a new venue, less machines would mean less funding \$\$.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>i believe there should be NO FURTHER reductions in gaming machines ,any more reductions will effect funding \$\$ into our community groups. Unless the council are going to replace funding into these groups in the future i would suggest we remove sinking lid and leave the gaming machine numbers as they are or increase to a reasonable level whereby funding is available for every organisation who applies.</p>
<p>Supporting documents</p>	<p>20151212_104323_resized.jpg - Received 20160114_180237_resized.jpg - Received 20160303_172717_resized.jpg - Received 20160303_172816_resized.jpg - Received 20160512_174119_resized.jpg - Received 20160513_173923_resized.jpg - Received 20160513_180338_resized.jpg - Received 20160513_180345_resized.jpg - Received 20160514_112905_resized.jpg - Received</p>

I would like to speak in support of my submission	No
Submission method	Online

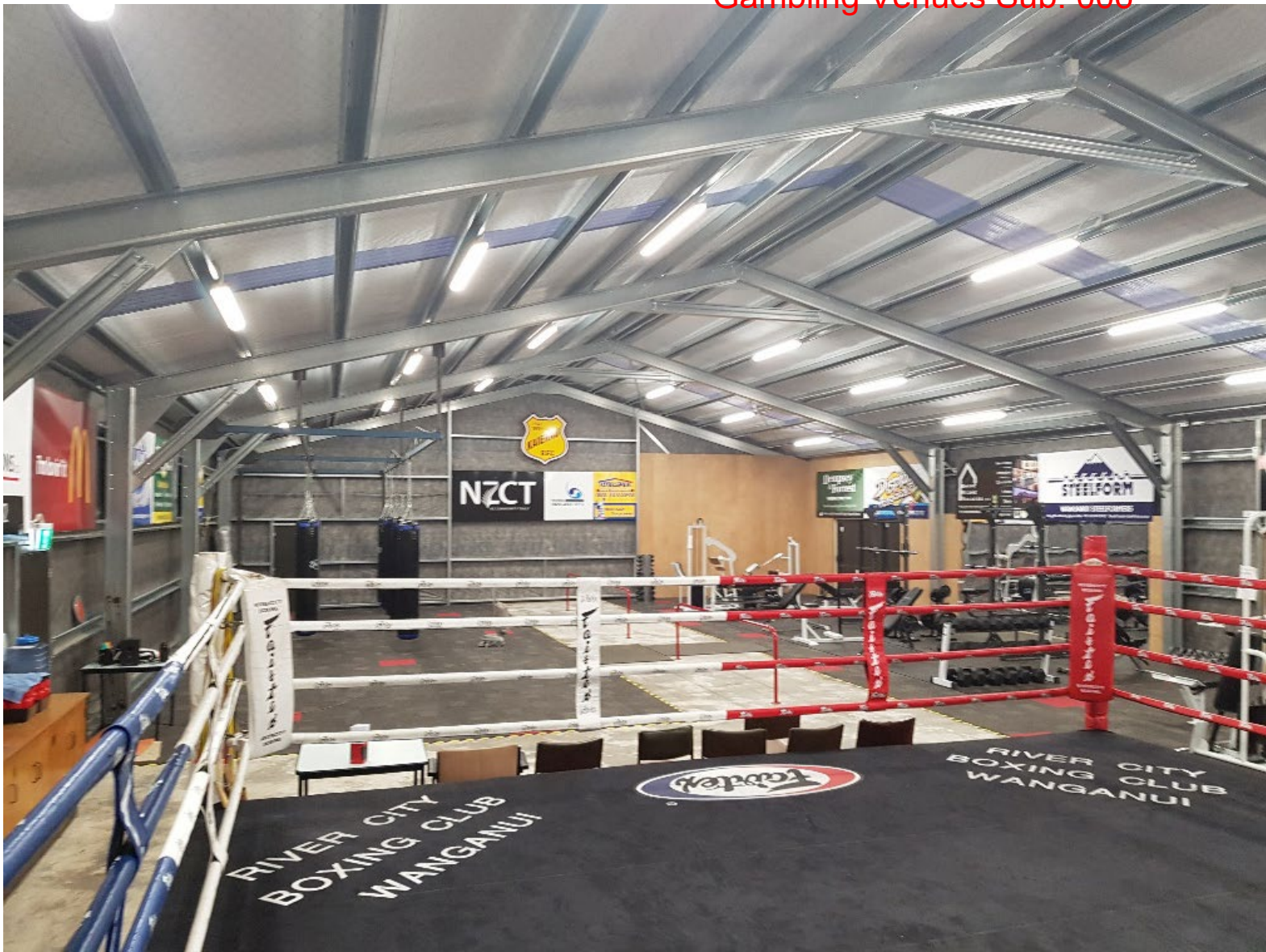


















From: [rosemary rippon](#)
To: [!Policy Submissions](#)
Subject: Review of Gambling Venues Policy
Date: Sunday, 15 November 2020 3:12:28 PM
Attachments: [Matipo WDC sinking lid let.docx](#)

Please find attached a submission from the Matipo Community Development Charitable Trust regarding the pending Review of Gambling Venues Policy.

Please use this email address to contact me for further comment if required.

Regards,

Rosemary Rippon



15 November 2020

Whanganui District Council
101 Guyton Street
WANGANUI 4500

Review of Gambling Venues Policy

The Matipo Community Development Charitable Trust (MCDCT) is opposed to the current 'sinking lid policy' for Class 4 gambling venues and machines in Whanganui. It is the view of MCDCT that a cap to retain the current number of Class 4 venues and machines is a preferable option for the future.

Whilst problem gambling is not condoned by MCDCT, the reality is that people who want to gamble will do so regardless. It is our view that gambling at a social venue may well be preferable to gambling online and in isolation. As well, local venues provide funding back to the local community and contribute nationally by paying taxes, whilst the majority of online gambling is overseas based.

MCDCT has used Lion Foundation funding to build a tunnel house adjacent to the community gardens and also to purchase the house that has become a community hub on Matipo Street. As a funding resource to small community groups such as ours, the Lion Foundation is extremely important - and likely to be more so in the future.

The effects of Covid-19, both globally and on New Zealand's economy, continue to adversely affect businesses and commercial enterprises. As well, the extremely low interest rates impact on philanthropic organisations thereby reducing the amount of funding available into the future.

This situation is of great concern to the many community organisations and sporting bodies that currently provide services throughout the local community. The reality is that reduced funding will severely curtail many future activities.

We believe it is in the interest of our community to support funding derived from gambling and to maintain venues and machines in Whanganui at the current numbers.

Yours sincerely,

Rosemary Rippon

From: [Whanganui District Council](#)
To: phoebescamp@hotmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Monday, 16 November 2020 8:11:04 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	335112011200316
First name	Phoebe
Last name	Scamp
Email address	phoebescamp@hotmail.com
Postal address	PO BOX 70 WHANGANUI WHANGANUI 4541
Daytime phone number	0224796927
Organisation name	Wanganui Marist Rugby Club
Your role	Secretary
Have you submitted to the Whanganui District Council before?	No
Gender	Gender Diverse
Age group	18 - 29 years
Ethnicity	NZ European, Maori, Pacific Peoples
Location	Whanganui Central (Laird Park, Whanganui Central, Whanganui Collegiate)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

<p align="center">KEY ISSUES</p>	
<p align="center">Current Policy</p> <p align="center">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly disagree</p>
<p>Please provide reasons for your response</p>	<p>I propose there is a cap placed on the current number of gambling machines within the region and no additional machines be introduced.</p>
<p align="center">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Neither agree nor disagree</p>
<p>Please provide reasons for your response</p>	
	<p>I am contacting you on behalf of the Whanganui Marist Rugby Club -over the years the club has benefited greatly from Community Grant Funding (e.g. NZCT & Lion Foundation). These grants have made a huge difference to our club. Although we have long-standing, generous and loyal sponsors in our club and members undertake many fundraising venture throughout the season, there is still a considerable shortfall in running the club. This is why the contributions from the above mentioned entities are so important. Without them we would stagnate. Some examples that NZCT & Lion Foundation have made possible: - New Set of Training Lights at Cullinane College - a huge cost which we could not afford. - Revamped Ladies / Men's</p>

<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Toilets & Showers - Upgraded our Clubroom Kitchen - A new Ceiling in our Clubrooms in Hatrick Street - This year we put in place changing facilities adjacent to the clubrooms for our school teams. - On top of these projects, the NZCT & Lion Foundation have allowed the yearly purchase of playing strips, medical supplies & travel expenses. We have members of our club in all areas who cannot afford to pay the subscriptions and associated costs of playing sport. We are aware of this and as a club subsidise these costs allowing them to participate. We are now planning for the future and wish to keep engaging young people and their whanau in sport. We feel however, that continued Community Funding is a prerequisite for this to happen. Community Groups and their source of income are vitally import for sport. We are proposing a cap is placed on the current number of gambling machines in our region so that ourselves & MANY other Not for Profit organisations in Whanganui can continue to exist.</p>
<p>Supporting documents</p>	<p>Peter Brosnahan_20201110_143856.pdf - Received</p>
<p>I would like to speak in support of my submission</p>	<p>Yes</p>
<p>Submission method</p>	<p>Online</p>



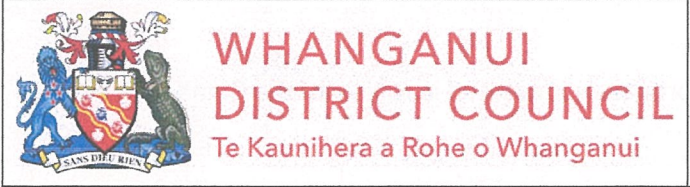












Submission: Gambling Venues Policy

Submissions close 5.00pm Friday 20 November 2020

Privacy statement: Please be aware when providing personal information that this submission form is part of the public consultation process. As such, this document (including contact details) will be copied and made publicly available. Personal information will be used for the administration of this consultation process and decision-making. All information will be held by the Whanganui District Council, 101 Guyton Street, and submitters have the right to access and correct personal information.

Online: You can complete this submission online at www.whanganui.govt.nz/haveyoursay

Alternatively, please return this form, or send your written submission to:

Review of Gambling Venues Policy
Whanganui District Council
101 Guyton Street
Whanganui 4500

Email: policysubmissions@whanganui.govt.nz

YOUR DETAILS (please print your details clearly)

Name: LAUREE HOCQUARD

E-mail: LWHOCQUARD@XTRA.CO.NZ

Postal Address: 12 WESTERN LINE
WANGANUI Post code 5471

Best daytime contact number: 0274827728

Organisation: If you are completing this submission on behalf of an organisation please name the organisation and your role:

WANGANUI BOWLING CLUB INC. (PATRON)
51 NELSON ST. WANGANUI

Oral submissions

If you wish to speak to Council in support of your written submission please tick the box below.

- Yes I would like to speak in support of my submission (please ensure you have completed the details above, including contact phone number)

Note: Hearings will be in early December 2020. If you have indicated that you wish to speak on your submission we will contact you to arrange a time. SPEAKER - LAUREE HOCQUARD (PATRON) ON BEHALF OF WANGANUI BOWLING CLUB & MEMBER

If you would be interested in being involved in further consultation opportunities with Council please tick the box below and ensure your contact details have been completed.

- Yes I would like to be involved in future consultation and am happy for you to retain my contact details.

Thank you for your submission



Please indicate your level of agreement with the following proposals presented in review of the Gambling Venues Policy.

KEY ISSUES	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Class 4 (Pokies) Gaming and Tab Venues					
<p>Retain existing sinking lid policy</p> <p>This would mean that Council continues its existing policy and that no additional electronic gaming machines or venues would be established.</p>					✓
<p>Please provide reasons for your response</p>	<p><i>ANY REDUCTION IN THE NUMBER OF GAMING MACHINES WILL REDUCE THE FUNDS AVAILABLE FOR GRANTS. A CAP ON THE PRESENT NO. OF GAMING MACHINES WOULD BE A PREFERABLE OPTION</i></p>				
Form of the Policy					
<p>That the drafting of the existing policy be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>		✓			
<p>Please provide reasons for your response?</p>	<p><i>POLICY SHOULD BE REDRAFTED TO INCLUDE A CAP ON THE PRESENT NUMBER OF GAMING MACHINES</i></p>				

Thank you for your submission

Please use this space to provide reasons for your responses to the above and to provide further comments regarding the review of the Gambling Venues Policy. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative options you may have:

FUNDING OR FUND RAISING IS BECOMING INCREASINGLY DIFFICULT, ESPECIALLY IN THESE POST COVID TIMES. ALL SPORTS BODIES ARE CHASING THE SAME COMMERCIAL SPONSORS AND THE VARIOUS TRUSTS PROVIDE THE NECESSARY GRANTS TO ENABLE SPORTING BODIES TO STAY AFLOAT. ANY REDUCTION IN FUNDS AVAILABLE FOR GRANTS WILL LEAD TO THE CLOSURE OF SOME SPORTING FACILITIES.

WANGANUI BOWLING CLUB IS THE THIRD OLDEST CLUB IN N.Z. OUR MEMBERS SUBSCRIPTION IS \$20-00 P.A. (THE DEAREST IN NAME) AFTER GST. AND LEVIES PAID TO BOWLS WANGANUI & BOWLS NZ. THE CLUB IS LEFT WITH \$6000-00 (AVES & INSCR ALONE ARE \$9200-00) Y/E 31-03-20 IT COST \$16,000-00 (EXCL. DEPON) TO RUN OUR CLUB.

SHORTFALL OF \$10,000-00 AFTER SUBSCRIPTIONS WAS FUNDED BY A COMBINATION OF RAFFLES, SPONSORSHIP, TOURNAMENTS, DONATIONS, BAR PROFITS & GRANTS. ALL AVENUES OF FUNDING ARE BECOMING MORE DIFFICULT EACH YEAR. - ANY INCREASE IN OUR SUBSCRIPTION RATE WOULD RESULT IN A LOSS OF MEMBERS. WE PROVIDE A FACILITY NOT ONLY FOR BOWLERS BUT ALSO NON-BOWLERS SUCH AS "BUSINESS HOUSE BOWLS" 100 PEOPLE FOR SIX WEEKS. A FACILITY FOR FUNCTIONS, A FACILITY FOR SCHOOLS BOWLING PROGRAMME & A FACILITY FOR MASTERS GAMES LAWN & TABLET BOWLS.

TO ENABLE US TO SURVIVE AND CONTINUE WITH THESE ACTIVITIES, IT IS ESSENTIAL THAT ALL AVENUES FOR GRANTS ARE RETAINED. COUNCILS CAPPING OF THE NUMBER OF GAMING MACHINES IN WANGANUI, IS VITAL IN ENSURING

THESE GRANTS REMAIN AVAILABLE Thank you for your submission

OPTIONAL:

Have you submitted to Council before? (Circle one)

Yes

No

Gender:

Female

Male

Another gender (specify if you feel comfortable)

.....

Age:

Under 18 Years

18 – 29 years

30 – 39 years

40 – 49 years

50 – 59 years

60 years and over

Location: (tick one)

Aramoho (Lower Aramoho, Upper Aramoho)

Marybank-Gordon Park

Bastia Hill / Durie Hill

Putiki

Blueskin- Maxwell

St Johns Hill / Otamatea

Castlecliff (Castlecliff North,

Springvale (Springvale West,

Castlecliff South, Mosston)

Springvale East, Mosston)

Fordell-Kakatahi

Whanganui Central (Laird Park,

Gonville (Balgownie, Tawhero,

Whanganui Central, Whanganui

Gonville South, Gonville East, Gonville West)

Collegiate)

Whanganui East (Williams Domain, Wembley Park, Kowhai Park)

Other

.....

Ethnicity: (circle all that apply)

NZ European

Maori

Asian

Pacific Peoples

Middle Eastern/Latin American/African

Other

Thank you for your submission



WHANGANUI DISTRICT CLASS 4 GAMBLING AND TAB POLICY SUBMISSION

Tina McIvor
Health Promotion Lead
Tina.mcivor@pgf.nz

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EXECUTIVE SUMMARY

Whanganui District Council already has a sinking lid policy, and we encourage the council to maintain it and strengthen it. We submit that the council consider adding a clause that provides no relocations and club mergers to enhance its sinking lid. Electronic Gaming Machines (EGMs) or 'pokies' that are in pubs, clubs and TABs are the most harmful form of gambling in New Zealand (Appendix 2), and although PGF Group advocates for sinking lid policies, we believe even this policy does not go far enough to minimise the harm from gambling in our communities.

Gambling machine numbers in the Whanganui district are reducing but only in small numbers, from 235 to 208 over the last five years. Thirteen of Whanganui's fourteen pokie venues are situated in the very high deprivation areas of Whanganui. Nationally, we continue to have 50% of pokies in our most deprived communities; 30-60% of the money being lost on pokies by problem gamblers, and a national spend that has been trending upward since 2014.

While these factors remain, harm will continue. It is important to note that the extent of harm cannot be measured by presentations to treatment services alone, because evidence shows that most people do not present to services for help, and every person with a gambling problem affects approximately six other people.

Information provided to the Council policy analyst may have included a risk assessment tool to enable an evaluation of gambling harm in Whanganui, sourced from a Ministry of Health (MoH)/KPMG *Gambling Resource for Local Government* (2013). PGF Group has been advised by the MoH that this tool was found to have errors and was removed from the Ministry's website in 2014. The findings, therefore, cannot be relied on and will not provide an accurate assessment of gambling harm in the District.

The extent of gambling harm in Aotearoa is often misrepresented in council hearings when it is said problem gambling is limited to 0.2% of the population. The Ministry of Health's *Strategy to Prevent and Minimise Gambling Harm 2019/20 to 2021/22*, estimates 252,000 people are being harmed, which is the population of Hamilton, our fourth largest city. An effective policy at a council level is critical and importantly, it is an area over which Council can exercise its authority.

Funding communities based on a model that relies on our lowest income households putting money they cannot afford to lose into pokie machines is unethical and inequitable; disproportionately impacting Māori and Pacific peoples who generally live in the areas where the majority of these machines are situated.

We urge you to read [Ending community sector dependence on pokie funding](#), a white paper authored by PGF Group, The Salvation Army, and Hapai Te Hauora Tapui.

Our submission is evidence based and founded on what is known about gambling harm across Aotearoa. It is time for councils and the Government to take a closer look at the relationship between harmful gambling, social disparity and a funding model that enables it.

CLASS 4 GAMBLING IN NEW ZEALAND AND WHANGANUI

Expenditure and national gambling trends

Expenditure on the four major sectors of gambling in New Zealand in the 2018/19 financial year was \$2.4 billion, continuing a trend of increases since 2009/10 (Appendix 3). Class 4 gambling accounted for 38.46% of the 2018/19 spend with \$924 million, a figure which has also risen each year since 2013/14 (the 2017/18 Class 4 component was \$895 million).

Almost half (48.3%) of the gamblers who sought professional help in 2017/18 cited non-casino pokies as their primary mode of gambling (Appendix 2). Over \$939 million was lost on pokies in the 2019 calendar year¹ or \$2.57 million a day. A conservative estimate is 40% of pokie losses are incurred by those with a gambling problem.² Pokie machines are also disproportionately located in the poorest areas. There are five times as many pokies in the most deprived areas of New Zealand as the least deprived areas.³ The deprivation levels of Whanganui's gambling venue locations are included as Appendix 4.

Gambling in Whanganui

Based on Census 2018 population data, and gambling statistics from the Department of Internal Affairs (DIA), Whanganui currently has:

- 14 gambling venues hosting 208 pokies – a machine for every 187 adults in the District.
- Of the 14 venues, thirteen are located in areas where the deprivation level is categorised as very high: the remaining one in a medium high area. A breakdown of the progression of Class 4 gambling venue locations versus deprivation is included as Appendix 4.
- \$10.7 million lost to pokies in 2019; \$29,413 a day; each pokie machine making an average of \$51,614 during this period.
- Whanganui currently has the 21st highest Average Class 4 spend per adult of the 67 TLAs. The average annual spend per adult in the District in 2019 was \$274.47.

Gambling, the cost of living, and threshold of harm

The median income in Manawatū-Whanganui is \$27,200 per annum, \$4,600 less than the national average. This is a weekly income of \$523. The median rental is \$220 per week so the remaining \$303 (before tax) must then provide food, power, petrol, the doctor, clothes, school trips etc.

The National Gambling Study finds a regular spend of \$50 or more a month to be a consistent risk factor towards harmful gambling, and calculates the percentages of people playing pokies once or more a year to be 8.2% for pubs, and 3.7% for clubs.⁴ In 2019, the Health and Lifestyles Survey calculated the national weekly participation to be 1.3%⁵

Funding

PGF Group, Hapai Te Hauora and The Salvation Army Oasis released a white paper in June 2020 titled [Ending community sector dependence on pokie funding](#), that explains the unethical nature of funding community and sports groups from pokies.

In 2019, from losses of \$939 million in pokie machines in pubs, clubs and TABs, a total of \$241 million was paid out in grants to community and sports groups.

Fifty percent of the 14,828 machines (7,414) are in the most deprived communities. Problem gamblers contribute between 30% - 60% of the amount paid out in community grants meaning that people experiencing harm either lose the amount equal to grants or considerably more: \$282m, \$376m or \$563m. We have provided you with a copy of this paper.

The *Gambling Harm Reduction Needs Assessment* (2018), prepared for the Ministry of Health, raises fundamental questions about the parity of the Class 4 funding system:

*“While there is little doubt about the community benefits associated with funding of the charitable sector, the policy rationale for compelling gamblers alone to make a special and very substantial contribution to funding these community benefits is rather unclear. There is no reason to assume that gamblers have a particularly high ability to pay (a principled policy rationale for progressive income taxes) and thus might be better placed to support charitable purposes than the rest of the community. In fact, the opposite seems to be the case: gambling tends to be more prevalent in lower income households and, as noted in section 4.3, the concentration of gambling venues tends to be higher in areas of high deprivation. Therefore gambling taxation and redistribution to community purposes tends to be regressive, i.e., placing a higher burden on the less-well-off ... Some organisations take an ethical stance to not receive funds from gambling sources”.*⁶

Commercial implications

We have argued in our white paper that the use of Class 4 gambling to raise community funds is not efficient, fair, or transparent. The question to consider is whether the sector provides an economic impetus to the economy of the Territorial Local Authority (TLA).

This issue has been addressed on several occasions; for instance, the Australian Productivity Commission states that pokie machines are not a good way of providing impetus to local economies.

Another way of looking at this is through analysis of the NZ household expenditure data which suggest that:

Class 4 pokies are a significant spend for deprived households.

If this spend were diverted to the retail sector there would be:

- More successful businesses
- More jobs created
- More tax collected - both income and GST.

It seems reasonable to assume that the council has as one of its aims, maximising business development and prosperity in the TLA. For this reason, the provision of Class 4 gambling opportunities should be limited as much as possible and the council should set in place policies which encourage commercial/retail development. In this case, it can be achieved by the cash currently going through pokies being diverted to expenditure on retail and other businesses.

Successful businesses can sponsor and support community groups and community sports without those groups being dependent on gambling losses. This also ensures benefits remain in the community.

WHAT MAKES A GOOD POLICY?

There is much stigma attached to gambling harm which means problems are often hidden and not confronted until sufferers are deep in crisis. A strong Class 4 gambling policy has a number of advantages: It is preventative, would support early help-seeking and address stigma by raising awareness in the general community about the risks associated with Class 4 gambling. A strong and clear policy is also consistent with the purposes of the Gambling Act 2003.

The purpose of the Gambling Act is to:

- (a) control the growth of gambling; and
- (b) prevent and minimise harm from gambling, including problem gambling, and
- (c) authorise some gambling and prohibit the rest; and
- (d) facilitate responsible gambling; and
- (e) ensure the integrity and fairness of games; and
- (f) limit opportunities for crime or dishonesty associated with gambling and the conduct of gambling; and
- (g) ensure that money from gambling benefits the community; and
- (h) facilitate community involvement in decisions about the provision of gambling.

Sinking lid policies

PGF Group commends the Whanganui District Council's sinking lid policy and submits that this would be strengthened with a clause that states no relocations of class 4 machines are allowed, and no club mergers are permitted. This is the best policy to control the growth of gambling and minimise harm.

Sinking lid is a term used in gambling control policies that has been adopted in varying forms by TLAs. As you know, the purpose of a sinking lid policy is to reduce, over time, the number of machines operating within a specific area. A comprehensive sinking lid policy is where if a venue closes, the pokies cannot go to another venue and no new Class 4 licences can be issued.

Twenty three of the 67 TLAs around New Zealand have already introduced sinking lid policies and Whanganui is one of those. This is partly driven by strong public opinion about harm and partly TLA's concern to promote community wellbeing. This is consistent with the purpose of the Gambling Act 2003 and section 4 where the definition of gambling harm includes harm to society at large.

A sinking lid policy is compromised where clubs are permitted to merge their class 4 machines. Allowing mergers enables the maintenance of existing numbers and risks creating 'pokie dens' in clubs. Research supports the argument that increased numbers of pokie machines leads to increased problem gambling prevalence.⁷

There are two main arguments against sinking lid policies. The first is that they don't work, based on numbers of people presenting to treatment services. Class 4 pokies account for almost 50% of gambling harm yet the number of pokie machines is still only coming down very slowly – the 12 months to September 2019 saw a reduction of 448 machines from 15,342 to 14,894. This reduction in machine numbers is primarily not occurring in the most deprived communities which is where it is needed.

The second argument is that there would be no community funding if machine numbers continue to go down. TLAs with sinking lid policies have seen no drastic or immediate reduction in the amount of community funding going to national or local community interest groups.

PGF RECOMMENDATIONS ON GAMBLING POLICY

PGF recommends the policy should retain the current sinking lid and include the following two provisions:

- **No relocations:** If a venue with pokie machines is forced to close or voluntarily closes, the council will not permit the pokies to be relocated to any venue within the council area.
- **No club mergers:** There will be no merging of club EGMs under any circumstances.

PGF recommends these provisions:

1. Restrictions on venue and machine consents:

- (i) The Council will not grant consent for the establishment of any additional Class 4 venues or additional gaming machines under this policy.
- (ii) Venue relocation is prohibited. A gambling venue consent is for one venue (one premises) and is not transferable to another venue. The consent is given to a venue at a given address, not to a person or business. To remove doubt, if a corporate society proposes to change to a new venue, a new consent is required under s 98 (c) of the Gambling Act 2003 and clause (i) of this policy applies.
- (iii) Club mergers are prohibited. Once a venue or club ceases to operate, the machine numbers will not be allocated to any new or existing venue or club.
- (iv) Council will not provide consent under Sections 95(1)(f) or 96(1)(e) of the Gambling Act 2003 to any application by corporate societies with Class 4 licences seeking Ministerial discretion to increase the number of gaming machines permitted at a venue.

PGF recommends that the Whanganui District Council include Best Practice Guidelines with the policy and encourages council to undertake a duty of care in monitoring venues.

SOCIAL COST OF GAMBLING

Recent research confirms the broad proportion of New Zealanders experiencing gambling harm is higher than the prevalence for problem gambling (Appendix 1). One in six New Zealanders say a family member has gone without something they needed or a bill has gone unpaid because of gambling.⁸ In results on second-hand harm from the 2018 Health and Lifestyles survey, 7% of adults (268,000) reported:

experiencing at least one form of household-level gambling harm (including having an argument about time or money spent on gambling, or going without or bills not being paid because too much money was spent on gambling by another person. Māori respondents were most likely to be affected by household gambling harms.

Broader harm for many is also critical harm for some. A number of studies have shown a clear link between problem gambling and suicidality⁹ and PGF regularly see people who have considered or attempted taking their own lives. Suicide is another acute phenomenon in New Zealand and should be carefully considered in terms of gambling policy making.

Harmful gambling and children

Children suffer greatly as a result of harmful gambling. They can regularly miss out on basic essentials if a parent has gambled away household money and there is a far greater risk the children of problem gamblers will inherit the same issue themselves.¹⁰

Children become aware 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. If a child's most basic needs are not 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.

The children of problem gamblers can also suffer emotionally, and 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 disappear unpredictably. Their relationship with their child or children can be damaged as they become more secretive, unreliable and prone to breaking promises. The parent's personality can become unrecognisable to their children, who feel gambling has become more important than family.¹¹

A study of gambling in Māori communities outlines a model of how children are at risk if gambling is part of their young lives. When exposed to gambling activities from an early age, children grow up seeing gambling as a normal activity and central to social life – they may also 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.¹²

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.

- 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%)¹³

Gambling and crime

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.¹⁴

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 a quarter of the relevant population, or about 10,000 people, committed illegal activities because of gambling.¹⁵

Studies of problem gambling and links to criminal activity suggest that much of the related crime goes unreported.¹⁶ Apart from the financial cost of gambling-related crime to organisations and individuals directly involved, further serious consequences are experienced by problem gamblers and their families if they are convicted of criminal activities.¹⁷

A 2009 New Zealand study found that “gamblers and significant others believe that a relationship exists between gambling and crime” and “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”.¹⁸ They suggest that 10% of people experiencing problem gambling and two thirds of those receiving counselling for gambling-related issues have committed a crime because of their gambling.

Family violence

The Ministry of Health and Auckland University of Technology have recently released research highlighting the links between problem gambling and family violence. Fifty per cent of participants (people seeking help from problem gambling services) claimed to be victims of family violence, and 44% of participants claimed to be perpetrators of family violence, in the past year.¹⁹

Economic degradation

There is limited data and analysis regarding the economic impact of gambling in New Zealand. However, New Zealand and international research has revealed the losses offer a sharp contrast to the often-celebrated economic gains. Money for gambling is diverted from savings and/or other expenditure, and can have a negative impact on local businesses and the economic health and welfare of whole communities.²⁰

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.²¹ A 2008 report noted that jobs and economic activities generated by gambling expenditure would exist elsewhere if that money was spent outside the gambling industry.²²

Remedies to problem gambling

A New Zealand study acknowledged there are many forces at play that can reduce problem gambling prevalence, including public health work, adaptation (when no new pokies are introduced) and policy. The report found strong support for the “access thesis,” which says that increases of non-casino pokies lead to an increase in problem gambling prevalence. The study found that there is an increase in problem gambling by nearly one person per each new machine.²³

The report concludes that, “from the perspective of public policy, and particularly harm minimisation, holding or reducing electronic gambling machine numbers would appear to be prudent based on our findings, and is likely to 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.²⁴

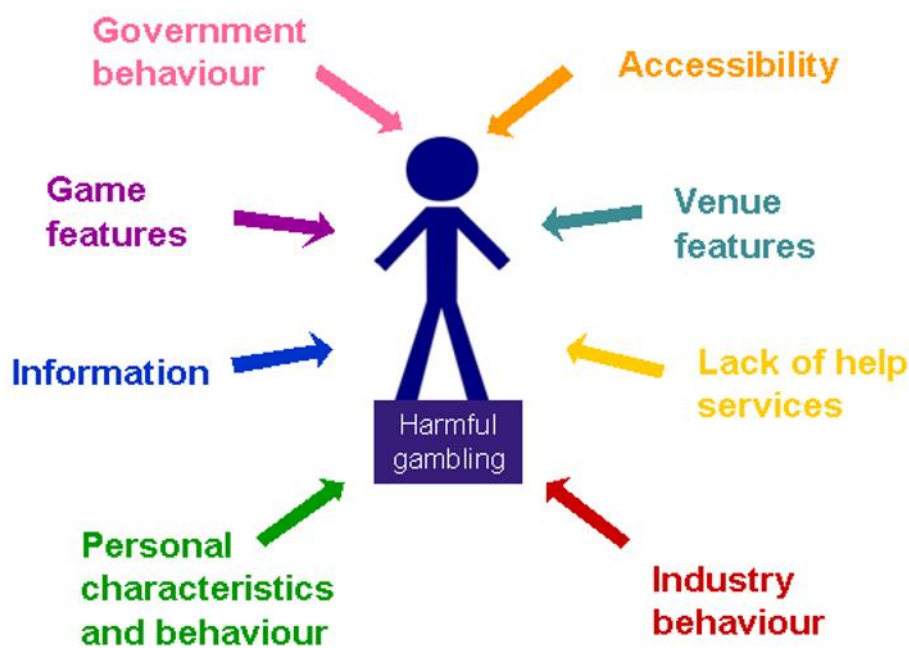
Gambling Venues Sub: 010

There is evidence that problem gambling harms can be reversed. This means that there is the potential to reduce the prevalence of problem gambling, and with it, the prevalence of many other problems as well.

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 Zealand, Australia, the United States, and Canada. Each concluded that increased availability of opportunities to gamble was associated with more gambling and more problem gambling.

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.

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 following diagram. Several of these factors can be influenced by the Council.



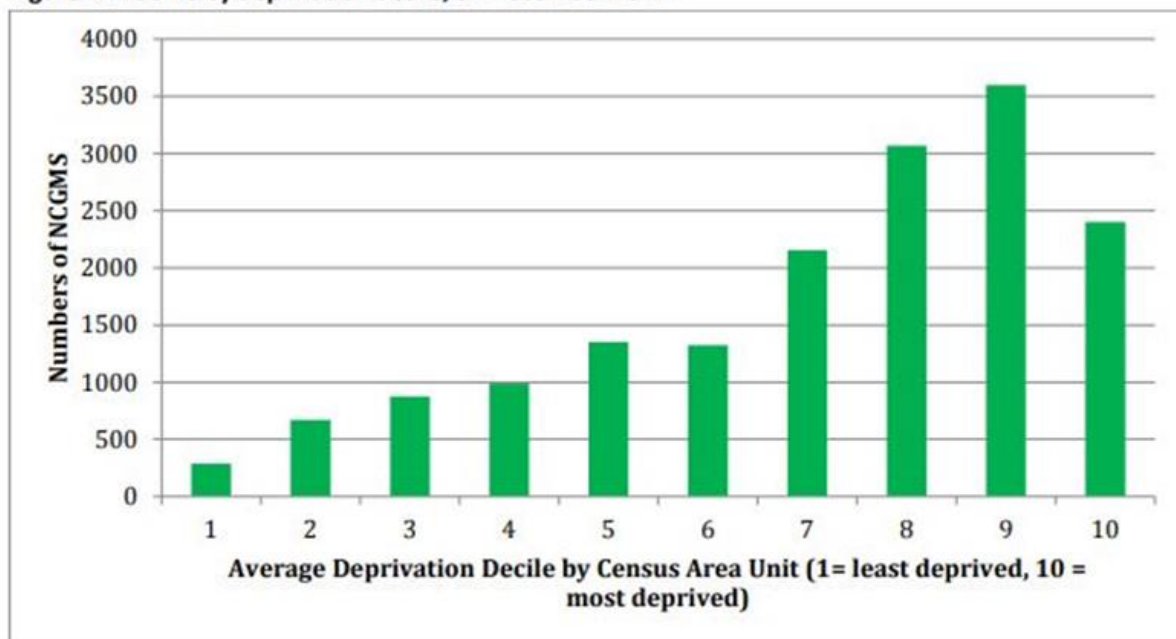
POKIE MACHINES: LOCATION, DENSITY AND DEPRIVATION

Pokie machines are disproportionately located in the poorest communities. According to a report commissioned by the Ministry of Health, *Informing the 2015 Gambling Harm Needs Assessment*, there are five times as many pokies in the most deprived areas of New Zealand as the least deprived, and pokies in the most deprived areas provide over half (56%) of the total expenditure.

The report goes further to discuss the likelihood of people living in areas of the highest deprivation developing harmful gambling, and that the proportion of pokies in these areas is growing:

The NZHS [New Zealand Health Survey] highlighted that the likelihood of problematic gambling increased as the level of deprivation increased. People living in neighbourhoods with the highest levels of deprivation (i.e. the most deprived) were five times more likely to report moderate-risk/problem gambling than those living in neighbourhoods with the lowest levels of deprivation (i.e. the least deprived). Neighbourhoods with higher levels of deprivation also appear to be more likely to offer opportunities for gambling. In 2014, 54.2 percent of NCGMs were located in CAUs with average deprivation deciles of 8 and higher – a slightly higher proportion than in 2011 (52.4 percent), and notably higher than 2009 (48 percent).

Figure 7: NCGMs by deprivation decile, 31 December 2014



25

The key drivers for the abundance of non-casino pokie venues in disadvantaged areas and areas with high proportions of “at risk” groups are unclear. On the demand side, there may be greater incentives to allocate pokies in areas where they will be used more intensively, and potential returns are highest. However, another explanation for the location may be in the distribution of venues, such as hotels and taverns.

Affluent areas have a greater ability to resist the location of hotels and taverns in their communities; communities with high rates of home ownership tend to take a more long-term view of planning and zoning issues. Whatever the explanation, the location of venues tends to concentrate the social costs in communities that are less able to bear them.²⁶

Vulnerability

Factors contributing to being a risky gambler include ethnicity, deprivation, major life events, psychological distress, cannabis use and various gambling behaviours.²⁷

- Māori and Pacific adults are over-represented in problem gambling prevalence rates:

Māori and Pacific people continue to have very high problem gambling prevalence rates. This means that unless more focus is placed on understanding why this is the case, and processes put in place to change the current situation, Māori and Pacific communities will continue to be disproportionately affected by gambling-related harm.²⁸

- Māori populations comprise 31% of intervention service clients²⁹, but make up only 15% of the population.³⁰
- 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 pokies as their problematic mode of gambling.³¹
- Pacific populations comprise 21.2% of intervention service clients³², but make up only 7% of the population.³³
- Problem gambling strongly linked to mental health state and disorders.³⁴
- Many problem gamblers also use tobacco, alcohol and other drugs.³⁵

THE ETHICS OF GAMBLING FUNDING

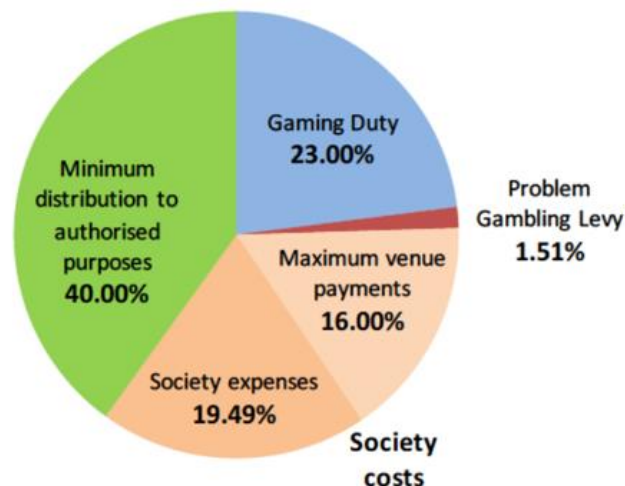
How pokie trusts work

Pokie trusts were established under the Gambling Act (2003) in an attempt to offset harm by returning some of the profits 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. Pokie machines are licensed to operate in pubs and clubs solely as a form of community fundraising³⁶ and licence holders must distribute their net proceeds to the community by way of grants.

Trusts and societies are currently required to distribute a minimum of 40% of their GST exclusive gross proceeds for each financial year according to the Gambling Regulations 2004 (Class 4 Net Proceeds: Part 2 Section 9 (1) and 10)).³⁷

Legislation dictates that each dollar of gross proceeds (i.e. turnover [aggregate stakes] minus user winnings) must be distributed in accordance with the pie chart shown in the figure below.³⁸ These include the fixed amounts towards gambling duty and the problem gambling levy.

Allocation of class 4 gaming machine gross proceeds
(excluding GST)



Every year approximately \$300 million is returned to the community from the proceeds of gambling on pokies outside of casinos. In 2015, 49% of the total funding (\$122m) went to sports, up from \$106m in 2014.

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 pokie machines.³⁹

There needs to be a more open, lower cost, and transparent system of reporting for the gambling trusts system. Of particular concern are issues of personnel and conflicts of interest, compliance with the Gambling and Sale and Supply of Alcohol Acts and providing greater clarity around the criteria by which funding is administered.

Regressive nature of gambling funding

Gambling generates significant funding for community purposes. However, gambling funding comes with a very high human cost and more equitable and less harmful forms of funding should be investigated. International and New Zealand studies have identified that gambling is sharply regressive. Income is effectively being redistributed away from low income communities.⁴⁰

One attraction for governments to collect public funding through gambling is that it appears to be "painless" or "voluntary" – meaning those contributing are less aware they are doing so through their participation in an activity not overtly framed as a form of taxation. The "painless voluntary donation" view has been criticised on grounds that it exploits the false hopes or financial risk-taking of those on lower incomes.⁴¹

The cognizance of problem gamblers, who supply such a large proportion of the funds, at the time of making their contribution is another argument against this form of fundraising. A study by Dowling et al., 2015, cited in a needs assessment prepared for the Addictions Team, Ministry of Health, reports:

prevalence estimates of psychiatric disorders in individuals seeking psychological or pharmacological treatment for problem gambling. Results from 36 studies were included and the authors found that:

- 56.4% had nicotine dependence
- 18.2% alcohol abuse
- 15.2% alcohol dependence
- 11.5% cannabis use disorder⁴²

The same study also found "that nearly three quarters had either a current or past psychiatric co-morbidity. The main current psychiatric disorders found were mood disorders (23.1%), alcohol use disorders (21.2%) and anxiety disorders (17.6%)⁴³ In other words, for a problem gambler, the contribution is not a voluntary or painless one.

Studies involving cost/benefit analysis have argued that the benefits from gambling for the majority of people are individually very small relative to the costs borne by the minority of people experiencing gambling harm.⁴⁴ People who are already socially and economically disadvantaged are most susceptible to gambling problems.⁴⁵

The revenue generated by gambling within a community is often spent in a more affluent community.⁴⁶ A 2004 study examining distribution of community benefit funding from six major pokie trusts found that more affluent areas (such as Central Auckland and the North Shore) were receiving considerably more funding per capita than the lower income areas (such as Manukau City).⁴⁷ It is our experience that jazz festivals and sports fields in wealthier suburbs are well funded, while high deprivation suburbs are not.

Impact of proposed policy on community funding

Pokie trusts often espouse that many community groups would not survive without pokie money. While it is true that some groups would suffer, pokie 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 pokie 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 pokies happens gradually. Therefore, a sinking lid policy should not have an immediate or significant impact on community funding.

Some groups have even argued that pokie handouts actually weaken community groups and that traditional fundraisers are much better at building community spirit and keeping sports and other groups strong.⁴⁸

PGF recognises the risks online gambling poses to people with gambling problems. However, pokie trusts often attempt to divert attention from pokies to online gambling. Some pokie trusts have gone so far as

saying “a sinking lid accelerates the migration to online gambling” from which communities lose all funding benefits.

There is no research to say that people move, or are moving from pokies to online gambling. The 2018 *Health and Lifestyles survey* shows that the proportion of New Zealanders gambling online via overseas websites has actually fallen since 2014.⁴⁹ Gambling clients report they do not experience the same ‘pull’ of online gambling as pokies. If a person has a problem with sports betting, for example, it does not necessarily follow that they will be harmed by pokies; a person addicted to online slot machines cannot be assumed to gamble harmfully when playing cards. Gambling behaviour cannot be generalised in this way.

Councils do not set online gambling policy as this the responsibility of central Government. Approximately half the people receiving counselling from problem gambling services are doing so because of their addiction to non-casino pokies. This is something that Council can help address, and PGF strongly encourages Council to do so by adopting a true sinking lid.

About PGF Group

The Problem Gambling Foundation of New Zealand is now trading as PGF Group (PGF), the ‘umbrella brand’ for PGF Services, Asian Family Services, and Mapu Maia. Services are delivered under contract to the Ministry of Health (MoH) and funded from the gambling levy to provide free, professional and confidential counselling, advice and support and deliver a broad programme of public health to prevent and minimise gambling harm.

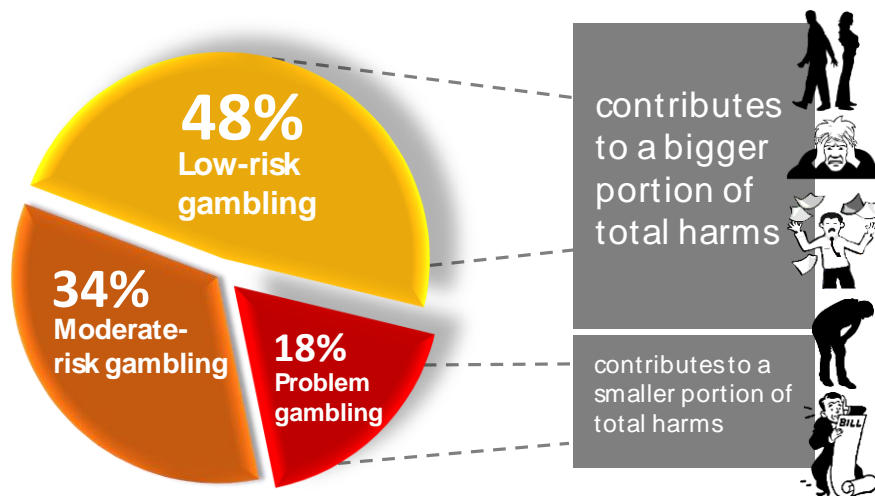
Asian Family Services provides free counselling and support in eight languages: face-to-face, via the Asian Helpline, and also through public health services for the Asian community. Asian Family Services operates from bases in Auckland and Wellington and supports clients working from Hamilton and by phone to Christchurch.

Mapu Maia is a Pasifika service, providing free counselling, support and public health services to the Pasifika community. Services operate from bases in Auckland, Wellington and Christchurch.

APPENDICES

Appendix 1. Measure of gambling-related harm

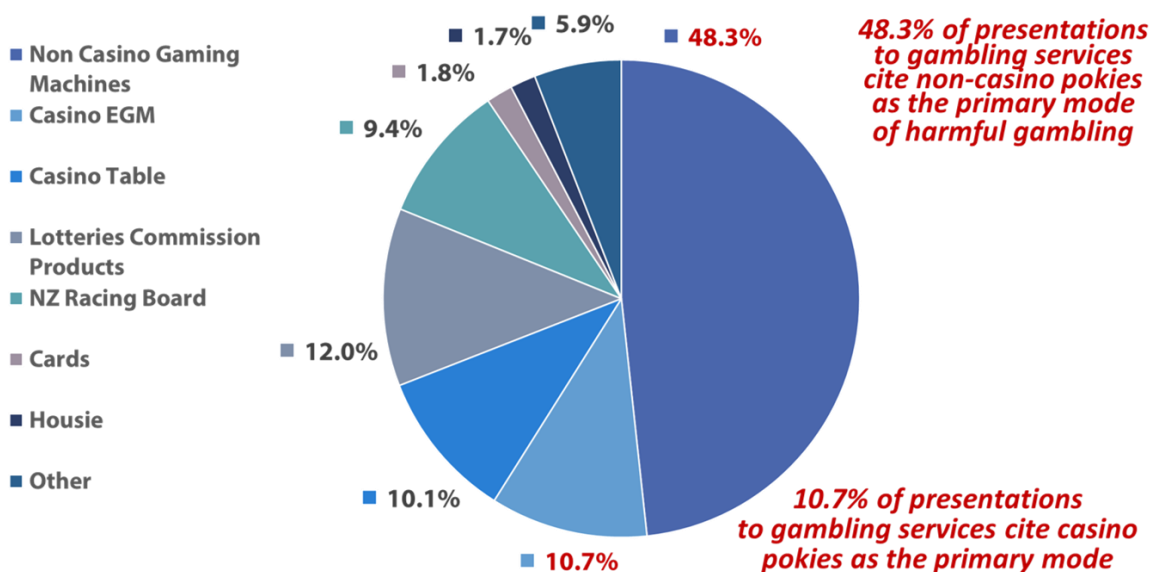
Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.



Appendix 2. Clients assisted by primary gambling mode

Ministry of Health Manatū Hauora. (2019). *Clients assisted by primary problem gambling mode* [Excel spreadsheet]. Retrieved from www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ppgm

CLIENTS GAMBLING HARM SERVICES PROVIDERS BY PRIMARY GAMBLING MODE 2017/18



Appendix 3. Gambling expenditure statistics

Department of Internal Affairs Te Tari Taiwhenua. (2020). 2011-2019 Gambling Expenditure Statistics [XLSX]. Retrieved from www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Gambling-Expenditure-Statistics

Gambling operators' key financial statistics (actual)

All values are actual (not inflation adjusted), in NZ dollars, GST inclusive and rounded to the nearest million (\$'000000).



Te Tari Taiwhenua
Internal Affairs

Financial Year	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
NZ Racing Board (TAB)									
Expenditure	273	283	294	310	325	342	338	350	332
Prizes (dividends)	1,261	1,336	1,422	1,522	1,748	1,928	1,907	1,913	1,926
Turnover	1,533	1,619	1,717	1,833	2,073	2,270	2,245	2,262	2,258
NZ Lotteries Commission									
Expenditure	404	419	432	463	420	437	555	561	530
Prizes	521	529	515	526	473	537	652	686	645
Turnover	926	948	947	989	894	974	1,207	1,246	1,175
Gambling Machines (outside casinos)									
Expenditure	856	854	827	806	818	843	870	895	924
Prizes	8,365	8,395	8,166	7,976	8,141	8,550	8,931	9,154	9,440
Turnover	9,222	9,245	8,995	8,783	8,949	9,393	9,801	10,049	10,364
Casinos									
Expenditure	448	483	490	486	527	586	572	578	616
Total									
Expenditure	1,982	2,038	2,042	2,065	2,091	2,209	2,334	2,383	2,402

Note: This table must be read in conjunction with the explanations included with this data release (tab 4).

Totals may differ from the sum of column entries due to rounding.

With each new release of this information, gambling operators review their previous years' data and, where necessary, provide revised information.

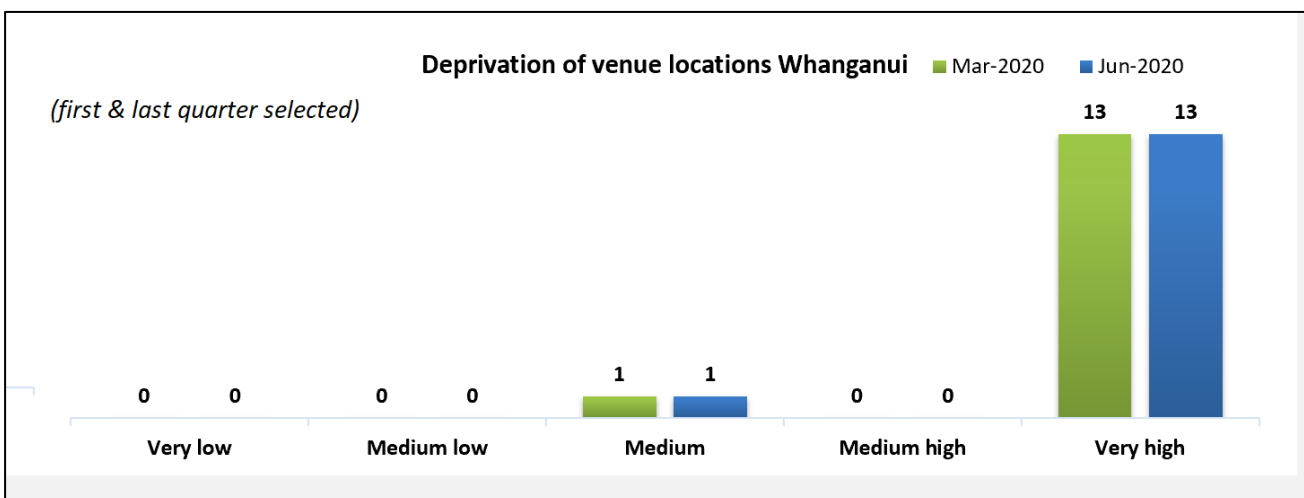
Please disregard previously released gambling expenditure statistics for the above financial years.

Disclaimer: The Department has compiled these statistics using information from the Electronic Monitoring System and gambling operators.

The Department of Internal Affairs disclaims and excludes all liability for any claim, loss, demand or damages of any kind whatsoever (including for negligence) arising out of, or in connection with, the use of this information.

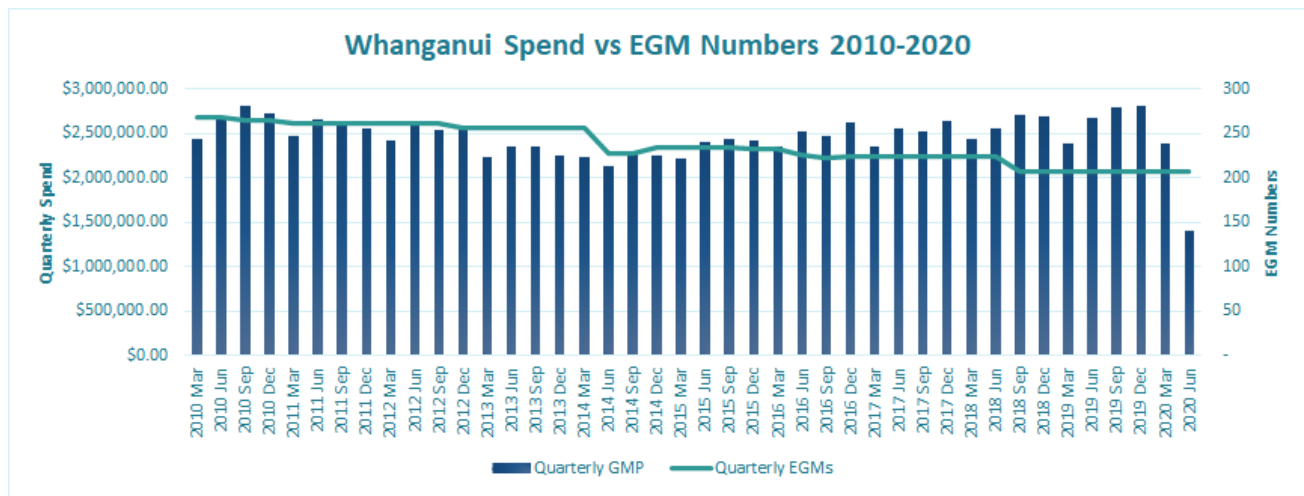
Appendix 4. Deprivation of gambling venue locations in Whanganui

Te Tari Taiwhenua | Department of Internal Affairs. (2020). GMP quarterly dashboard (as at June 2020) [Excel file]. Retrieved from [www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Gaming-Machine-Proceeds-\(GMP\)-Data](http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Gaming-Machine-Proceeds-(GMP)-Data)



Appendix 5. Whanganui quarterly spend vs machine numbers 2010-2020

Financial and EGM data sourced from Te Tari Taiwhenua | The Department of Internal Affairs. (2020). *Gaming machine venues, numbers and expenditure by territorial authority/district* [Excel files]. Retrieved from https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Gaming-Machine-Venues-Numbers-and-Expenditure-by-Territorial-AuthorityDistrict



¹ The Department of Internal Affairs Te Tari Taiwhenua. (2020). *Class 4 Gambling Key Performance Indicators Updated 12-February-2020*. Retrieved from [www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Statistics/\\$file/C4-A3-KPIs-2019.pdf](http://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Statistics/$file/C4-A3-KPIs-2019.pdf)

² Productivity Commission. (2010). *Gambling*, Report no. 50. Canberra, Australia.

³ Allen & Clarke. (2015). *Informing the 2015 Gambling Harm Needs Assessment*. Report for the Ministry of Health, Wellington: Allen & Clarke Policy and Regulatory Specialists Ltd.

⁴ Abbott, M., Bellringer, M., & Garrett, N. (2018). *New Zealand National Gambling Study: Wave 4 (2015). Report number 6*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

⁵ Health Promotion Agency Te Hīringa Hauora. (2020). *Gambling participation frequency 2018*. Retrieved from <https://kupe.hpa.org.nz/#!/gambling/gambling-participation-frequency>

⁶ Sapere Research Group. (2018). *Gambling Harm Reduction Needs Assessment*. Wellington: Ministry of Health.

⁷ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>

⁸ Abbott, M. W. (2012). Knowledge, views, and experiences of gambling and gambling-related harms in different socio-economic groups in New Zealand. *Australian and New Zealand Journal of Public Health*, 36(2), 153–159.

⁹ Moghaddam, J. F. (2015). 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*.

¹⁰ Dowling, N. J. (2010). *Children at risk of developing problem gambling*. The Problem Gambling Research and Treatment Centre.

¹¹ Dyal, L. T. (2009). *The impact of gambling on Māori. Ngā Pae o te Māramatanga*. Ngā Pae o te Māramatanga.

¹² As above.

¹³ Shaw, M. F. (2007). The effect of pathological gambling on families, marriages and children. *CNS Spectrums*, 12(8).

- ¹⁴ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*. Auckland University of Technology. AUT Gambling and Addictions Research Centre, prepared for the Ministry of Health. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/research-and-evaluation/implementation-2004-2007/formative-investigation-between-gambling-including-pg-and-crime-nz>
- ¹⁵ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ¹⁶ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*.
- ¹⁷ Productivity Commission 2010, *Gambling*, Report no. 50. Canberra, Australia.
- ¹⁸ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*.
- ¹⁹ Auckland University of Technology. (2017). *Problem Gambling and Family Violence in Help-Seeking Populations: Co-Occurrence, Impact and Coping*. Wellington: Ministry of Health.
- ²⁰ Harrison, B. (2007). *Casinos and regeneration: the story so far, briefing paper no. 1*. London: IPPR (Institute for Public Policy Research, UK).
- ²¹ 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). *Problem gambling and harm: Towards a national definition*. Victoria: Department of Justice. Retrieved 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)
- ²² Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ²³ 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(3), 225–244.
- ²⁴ As above.
- ²⁵ Allen & Clarke. (2015). *Informing the 2015 Gambling Harm Needs Assessment*. Report for the Ministry of Health, Wellington: Allen & Clarke Policy and Regulatory Specialists Ltd.
- ²⁶ Hancock, L., O’Neil, M. (2010). *Risky business: Why the commonwealth needs to take over gambling legislation* (Alfred Deakin Research Institute). Retrieved from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>; Francis Group. (2009). *Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health Manatū Hauora*;
- ²⁷ Abbott, M., Bellringer, M., & Garrett, N. (2018). *New Zealand National Gambling Study: Wave 4 (2015). Report number 6*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.
- ²⁸ As above
- ²⁹ For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>
- ³⁰ Statistics New Zealand (2019). *2013 Census – Major ethnic groups in New Zealand*. Retrieved from <https://www.stats.govt.nz/infographics/major-ethnic-groups-in-new-zealand>
- ³¹ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ³² For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>
- ³³ Statistics New Zealand (2019). *2013 Census – Major ethnic groups in New Zealand*. Retrieved from <https://www.stats.govt.nz/infographics/major-ethnic-groups-in-new-zealand>

³⁴ Sapere Research Group. (2018). *Gambling Harm Reduction Needs Assessment*. Wellington: Ministry of Health.

³⁵As above

³⁶ 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.

³⁷ 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% tax rate, 1.1% problem gambling levy and GST (Inland Revenue 2006).

³⁸ Internal Affairs. (2016). *Pokies in New Zealand: a guide to how the system works*. Retrieved from [https://www.dia.govt.nz/Services-Casino-and-Non-Casino-Gaming-Gambling-in-Pubs-and-Clubs-\(Class-4\)#guide](https://www.dia.govt.nz/Services-Casino-and-Non-Casino-Gaming-Gambling-in-Pubs-and-Clubs-(Class-4)#guide)

³⁹ As above.

⁴⁰ Hancock, L. & O'Neil, M. (2010). *Risky business: Why the commonwealth needs to take over gambling legislation*. (Alfred Deakin Research Institute working paper 11). Retrieved 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*. Retrieved from http://www.unitingcare.org.au/images/stories/submissions/sub_productivity_com_gambling_may09.pdf

⁴¹ Bostock, W. (2005) Australia's gambling policy: motivations, implications and options. *Journal of Gambling Issues*, 13. Retrieved 2013 from <http://jgi.camh.net/doi/full/10.4309/jgi.2005.13.4>

⁴² Sapere Research Group. 2018. *Gambling Harm Reduction Needs Assessment*. Wellington: Ministry of Health.

⁴³ As above

⁴⁴ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>

⁴⁵ 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. Retrieved 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 2013 from http://www.pc.gov.au/__data/assets/pdf_file/0006/87630/sub163.pdf

⁴⁶ Adams, P. J., Rossen, F. V. (2005). *The ethics of receiving funds from the proceeds of gambling*. Centre for Gambling Studies, University of Auckland.

⁴⁷ 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 from http://www.fmhs.auckland.ac.nz/soph/centres/cgs/_docs/2004adams2_overview.pdf

⁴⁸ 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*; 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/>;
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>

⁴⁹ Health Promotion Agency. (2018). *Kupe 2018: Health and Lifestyles Survey* [Indicator: Online gambling on overseas website]. Retrieved from <http://kupe.hpa.org.nz/>

Ends.

From: [Whanganui District Council](#)
To: awrowing@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Tuesday, 17 November 2020 9:39:18 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	770112139201717
First name	Grader (Graeme)
Last name	Howells
Email address	awrowing@gmail.com
Postal address	Box 5033 Aramoho WHANGANUI 4542
Daytime phone number	0274892498
Organisation name	Aramoho Whanganui Rowing Club Inc
Your role	Club Secretary
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	60 years or over
Ethnicity	NZ European
Location	Springvale (Springvale West, Springvale East, Mosston)
Would you be interested in being involved in further consultation opportunities with Council?	No

KEY ISSUES	
<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p style="text-align: center;">Strongly disagree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>The WDC Policy will not decrease problematic gambling and will have a deleterious impact on our Club and other non-profit organizations within the region who obtain grants from pokie machine revenue currently. The Committee of the Aramoho Whanganui Rowing Club unanimously recommend the alternative of having machine numbers capped at November 2019 numbers</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p style="text-align: center;">Neither agree nor disagree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	
	<p>An ongoing reduction in machine numbers will result in decreased revenue for agencies to distribute back to the community. In the past financial year our club received \$60.600 of grants from this source. Spread over about 60 active members, this loss of income would result in subscriptions being trebled in broad terms. With the majority of our members currently coming from Whanganui High School, many of our members and families will not be able to continue and</p>

Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:

potential recruitment will also be adversely impacted. A loss of membership will result in higher costs being borne by fewer numbers which will further exacerbate the problem. Our Club is a community asset and has been existence for 145 years and will struggle to provide the recreational enjoyment and life benefits of rowing to future generations of Whanganui citizens. It needs to be noted that our Club is not solely reliant on grants - In the past financial year over \$15000 was separately raised via ergathons, raffles, hay stacking etc. however there is a limit to how much more can be extracted from the Whanganui Community in the future. Capping the number of machines at the current level will at least enable the majority of people who undertake this form of recreation to continue in the knowledge that the income gained will be distributed back to the local community, rather than nationally or abroad. Our Club has a proud history of success and the life skills benefits gained by many over the years would far outweigh the negative effect of those with gambling issues who can be monitored more effectively in a capped machine environment rather than pursuing alternatives.

Supporting documents	File(s) not provided
I would like to speak in support of my submission	Yes
Submission method	Online

From: [Whanganui District Council](#)
To: mahangawilliams@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Tuesday, 17 November 2020 11:13:29 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	746112313202817
First name	Mahanga
Last name	Williams
Email address	mahangawilliams@gmail.com
Postal address	2/5 St Leonard Street
Daytime phone number	+64272433561
Organisation name	Mana Man
Your role	President
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	50 - 59 years
Ethnicity	Maori
Location	St Johns Hill / Otamatea
Would you be interested in being involved in further consultation opportunities with Council?	Yes
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>To prevent further social harm. Less pokies = less harm within our community. Negative social impacts of gambling include - o Decrements to physical and mental health (both morbidity and mortality); o Emotional or psychological distress; o Financial harm; o Reduced performance at work or education; o Relationship disruption and harm to others, including parenting issues and domestic abuse; o Criminal activity; and o Alcohol and other addiction.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Neither agree nor disagree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Gambling harm is often hidden, but when recognised can manifest itself as crime, violence and violent crime, issues with physical and mental health, negatively impact relationships, and loss of productive/employment.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	
<p style="text-align: center;">Supporting documents</p>	<p>File(s) not provided</p>

I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: jeff@phillipselect.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 10:10:13 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	027111010201318
First name	Jeff
Last name	Phillips
Email address	jeff@phillipselect.co.nz
Postal address	17 PICKWICK ROAD WHANGANUI 4571
Daytime phone number	0274430998
Organisation name	Whanganui Swimming
Your role	Swimming- Board Member
Have you submitted to the Whanganui District Council before?	Yes
Gender	Male
Age group	50 - 59 years
Ethnicity	NZ European
Location	St Johns Hill / Otamatea
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly disagree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>On behalf of Whanganui Swimming we oppose the sinking lid policy and request a cap at the current gaming machine numbers (208 gaming machines). As charitable trust we rely heavily on gaming machine funding to offset the costs associated with employing a professional swim coach as well as lane hire at the Splash Center. As we are a youth orientated sport with a large portion of our swimmers coming from low decile parts of the city reducing gaming funding to our organization will make it unsustainable in its current format. Lack of gaming funding means we would have to increase fees which will drive numbers down and reduce the amount of Splash Center lane hire required (note this impacts the WDC as we are a major user of this facility), ultimately our coaching will need to revert back to a volunteer basis</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Neither agree nor disagree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	
<p style="text-align: center;">Please use this space to provide any further comments regarding this consultation. In particular, if you</p>	

disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	
Supporting documents	File(s) not provided
I would like to speak in support of my submission	Yes
Submission method	Online

From: [Whanganui District Council](#)
To: [shirley.forward](#)
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 10:35:35 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	448111035203418
First name	Shirley
Last name	Forward
Email address	shirleyforward1@gmail.com
Postal address	55 Rimu Street
Daytime phone number	0273386337
Organisation name	Neighbourhood Support Wanganui Inc.
Your role	Chair
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	60 years or over
Ethnicity	NZ European
Location	Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

<p align="center">KEY ISSUES</p>	
<p align="center">Current Policy</p> <p align="center">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p align="center">Strongly disagree</p>
<p align="center">Please provide reasons for your response</p>	<p>Without funding we cannot exist, and while we don't ask for a large amount from this source we do rely heavily on the amount we are given.</p> <p>Neighbourhood Support works with decile 1 schools to help instill the sense of community and responsibility for that community that children need to achieve in life. Many of them may well become ratepayers and work locally or even own a business so those values will be essential. We need the resources to carry out that work which is why we approach NZCT.</p>
<p align="center">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p align="center">Strongly disagree</p>
<p align="center">Please provide reasons for your response</p>	<p>We feel the policy should be reconsidered, not improved.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Instead of the 'sinking lid' policy we feel Council should consider a cap on current numbers of gaming machines. We do not consider the number excessive, with our rapidly increasing population. If a business is forced to rebuild following a massive disaster, surely they need assistance not punitive measures that could close another local business.</p>

Supporting documents	File(s) not provided
I would like to speak in support of my submission	Yes
Submission method	Online

From: [Whanganui District Council](#)
To: gfeist@xtra.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 2:47:43 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	004111447204318
First name	Graham
Last name	Feist
Email address	gfeist@xtra.co.nz
Postal address	1130 Brunswick Road
Daytime phone number	0276588680
Organisation name	Badminton Whanganui and Wanganui Community Sports Centre
Your role	Secretary/Treasurer of Badminton and Chairman of Sports Centre
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	60 years or over
Ethnicity	NZ European
Location	Blueskin- Maxwell
Would you be interested in being involved in further consultation opportunities with Council?	Yes

KEY ISSUES	
Current Policy	
<p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly disagree
Please provide reasons for your response	<p>Number of machines should be held at the current number instead of a sinking lid. A natural disaster or a Covid outbreak causing closures for finance reasons could decimate the number of machines available. Many organisations are dependent on receiving class 4 funding to keep their organisations viable. Reduced availability of funding will force closure or greatly reduced services for these organisations. Over the last 20 years the Sports Centre has received more than \$250k and Badminton has received over \$95k in class 4 funding. Reduced availability of funding will reduce the option of activities resulting in a less active Whanganui population.</p>
Updates to the Policy	
<p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	
Please provide reasons for your response	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	

Supporting documents	File(s) not provided
I would like to speak in support of my submission	Yes
Submission method	Online

From: [Whanganui District Council](#)
To: hepimalcom@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 3:02:29 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	983111502202718
First name	Malcom
Last name	Hepi
Email address	hepimalcom@gmail.com
Postal address	36 TINIRAU STREET WHANGANUI EAST WHANGANUI 4500
Daytime phone number	02108328876
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	40 - 49 years
Ethnicity	Maori
Location	Whanganui East (Williams Domain, Wembley Park, Kowhai Park)
Would you be interested in being involved in further consultation opportunities with Council?	No

KEY ISSUES	
<p>Current Policy</p> <p>That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly agree
Please provide reasons for your response	We need less machines in Whanganui
<p>Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Strongly agree
Please provide reasons for your response	Tighten up on loopholes
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	Māori are at risk of harm, this needs to be stopped
Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: deladams56@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 3:26:16 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	716111526201518
First name	Del
Last name	Kitson
Email address	deladams56@gmail.com
Postal address	24 SEDGEBROOK STREET WHANGANUI EAST WHANGANUI 4500
Daytime phone number	0212605302
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	60 years or over
Ethnicity	Maori
Location	Whanganui East (Williams Domain, Wembley Park, Kowhai Park)
Would you be interested in being involved in further consultation opportunities with Council?	No

KEY ISSUES	
<p>Current Policy</p> <p>That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly agree
Please provide reasons for your response	Reduce the amount of machines in Whanganui
<p>Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Strongly agree
Please provide reasons for your response	Clearer and consistent means less loopholes
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	These machines are addictive and Ive seen first hand what they have done to my extended whānau.
Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: akiwistorm@hotmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 3:49:46 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	063111549204618
First name	Stormie
Last name	Hunter Rogan
Email address	akiwistorm@hotmail.com
Postal address	36 TINIRAU STREET WHANGANUI EAST WHANGANUI 4500
Daytime phone number	0211481934
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	40 - 49 years
Ethnicity	Maori
Location	Whanganui East (Williams Domain, Wembley Park, Kowhai Park)
Would you be interested in being involved in further consultation opportunities with Council?	No

KEY ISSUES	
<p>Current Policy</p> <p>That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly agree
Please provide reasons for your response	The less machines in Whanganui the better
<p>Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Strongly agree
Please provide reasons for your response	Wording need to be definitive to reduce the risk of loopholes
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	Pokies addictions in my experience has seen whānau go hungry, become violent, get drunk and depressed because of the loses and mental health starts to slide downhill.
Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

 <p>WHANGANUI DISTRICT COUNCIL Te Kaunihera a Rohe o Whanganui</p>	<p>Submission: Gambling Venues Policy</p>
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Submissions close 5.00pm Friday 20 November 2020

Privacy statement: Please be aware when providing personal information that this submission form is part of the public consultation process. As such, this document (including contact details) will be copied and made publicly available. Personal information will be used for the administration of this consultation process and decision-making. All information will be held by the Whanganui District Council, 101 Guyton Street, and submitters have the right to access and correct personal information.

Online: You can complete this submission online at www.whanganui.govt.nz/haveyoursay

Alternatively, please return this form, or send your written submission to:

Review of Gambling Venues Policy
 Whanganui District Council
 101 Guyton Street
 Whanganui 4500

Email: policysubmissions@whanganui.govt.nz

YOUR DETAILS (please print your details clearly)

Name: Sam Beatson-Shaw

E-mail: Sam.beatson-shaw@wdhb.org.nz

Postal Address: 100 Heads rd Gonville, Whanganui

..... Post code 4501

Best daytime contact number: 0212046716

Organisation: If you are completing this submission on behalf of an organisation please name the organisation and your role:

..Public Health Centre.. Whanganui District Health Board.. Kaihoe/Health promotion.....

Oral submissions

If you wish to speak to Council in support of your written submission please tick the box below.

- Yes I would like to speak in support of my submission (*please ensure you have completed the details above, including contact **phone number***)

Note: Hearings will be in early December 2020. If you have indicated that you wish to speak on your submission we will contact you to arrange a time.

If you would be interested in being involved in further consultation opportunities with Council please tick the box below and ensure your contact details have been completed.

Yes I would like to be involved in future consultation and am happy for you to retain my contact details.

Thank you for your submission

Please indicate your level of agreement with the following proposals presented in review of the Gambling Venues Policy.

KEY ISSUES	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Class 4 (Pokies) Gaming and Tab Venues					
Retain existing sinking lid policy					
This would mean that Council continues its existing policy and that no additional electronic gaming machines or venues would be established.	✓				
Please provide reasons for your response	<p>A sinking lid helps to reduce the availability of EGM which has been linked to a reduction in gambling related harm. Additionally by disallowing the relocation and club mergings of existing venues will strengthen the existing sinking lid substantially.</p> <p>.....</p> <p>.....</p> <p>.....</p>				
Form of the Policy					
That the drafting of the existing policy be improved by:					
<ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, to make it clearer and more consistent.	✓				
Please provide reasons for your response?	<p>.....</p> <p>The policy could be revised to be made more clear. Specifically by including the terminology "new venue" and "existing venue" will improve the clarity of the policy.</p> <p>.....</p> <p>.....</p> <p>.....</p>				

Thank you for your submission

OPTIONAL:

Have you submitted to Council before? (Circle one)

Yes **No**

Gender: Female **Male** Another gender (specify if you feel comfortable)

.....

Age: Under 18 Years **18 – 29 years** 30 – 39 years 40 – 49 years
50 – 59 years 60 years and over

Location: (tick one)

- Aramoho (Lower Aramoho, Upper Aramoho)
 - Bastia Hill / Durie Hill
 - Blueskin- Maxwell
 - Castlecliff (Castlecliff North, Castlecliff South, Mosston)
 - Fordell-Kakatahi
 - Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
 - Marybank-Gordon Park
 - Putiki
 - St Johns Hill / Otamatea
 - Springvale (Springvale West, Springvale East, Mosston)
 - Whanganui Central (Laird Park, Whanganui Central, Whanganui Collegiate)
 - Whanganui East (Williams Domain, Wembley Park, Kowhai Park)
 - Other
-

Ethnicity: (circle all that apply)

- NZ European** **Maori** Asian Pacific Peoples
- Middle Eastern/Latin American/African
- Other

Thank you for your submission



This submission is written on behalf of Whanganui District Health Board Public Health Centre. We thank you for the opportunity to submit on the Whanganui District Class 4 Gambling and TAB Policy Submission.

This submission is written on behalf of Whanganui District Health Board Public Health Centre. We thank you for the opportunity to submit on the Whanganui District Class 4 Gambling and TAB Policy Submission.

“Gambling harm is often hidden but can be recognised in poverty and loss of savings, damage to mental health, susceptibility to other addictive behaviours, crime, violence, broken down relationships, and poor performance in work”. -**2020 Gambling venues Policy Review statement of proposal.**

We support the Council’s decision to retain the sinking lid policy and update existing terminology to include “new venue” and “existing venue” to improve the clarity of the policy. We are also suggesting that you strengthen the sinking lid policy by adding a clause that provides no relocations and club mergers to enhance the sinking lid.

The link between Gambling, mental health and wellbeing is well documented. As much as 100,000 New Zealanders mental wellbeing may be harmed as a direct result of gambling. Additionally, women with low, moderate, or high risk of problem gambling are also at significantly higher risk for anxiety and depressive disorders based off (Abbott et al.,2012) findings. Amongst a cohort of 79 people attending a gambling harm treatment service, 80% reported suicidal ideation based off (Battersby et al., 2006) study. Suicide is complex and multi-faceted; it would be an oversimplification to assert gambling causes suicide. However, evidence from (Wong et al, 2010) supports a direct link between gambling, suicidal ideation and suicide attempts.

The Whanganui District is more susceptible to gambling related harm due to high rates of social deprivation- 69% of the population living within the highest deprivation scales, decile 8-10, and a high rate of Maori population- 26% of the total population, compared to the rest of New Zealand. Shore, 2008 found that both Maori and people living in social deprivation experience gambling harm disproportionately and tends to occur alongside coexisting issues such as hazardous drinking and smoking.

Further, the Whanganui Districts electronic gaming machine (EGM) rate of 1 EGM per 218 people is higher, compared to the national average of 1 EGM per 338 people. Therefore, ample access to and opportunity for gambling is readily available locally. The current Gambling and TAB venues sinking lid policy strikes a good balance between the positive and negative effects of gambling as it continues to impede the expansion of further EGMs into the District while still allowing for gambling. The restriction aims to

minimise gambling related harm as it is generally considered the greater the density of EGMs for a population, the greater the risk of problem gambling. For this reason, we support the WDC decision to retain the sinking lid with the additional clause that provides for no relocations and club mergers.

References:

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.

Battersby, M., B. Tolchard, M. Scurrah and L. Thomas (2006). "Suicide ideation and behaviour in people with pathological gambling attending a treatment service." *International Journal of Mental Health and Addiction* 4(3): 233 -246.

Shore. (2008). Assessment of the social impacts of Gambling in New Zealand. Auckland: Ministry of health.

Wong PW, Cheung Dy, Conner KR, Conwell Y, Yip PS. (2010). Gambling and completed suicide in Hong Kong: a review of coroner court files. *Prim care companion J Clin psychiatry*.

From: [Whanganui District Council](#)
To: petrina@ntota.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 6:06:35 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	289111806203418
First name	Petrina
Last name	Clark
Email address	petrina@ntota.co.nz
Postal address	38 BENNETT STREET GONVILLE WHANGANUI 4501
Daytime phone number	0210498748
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	
Ethnicity	Maori
Location	Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
Would you be interested in being involved in further consultation opportunities with Council?	No

KEY ISSUES	
<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p style="text-align: center;">Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>In my experience within the community there are lots of people in lower socio economic communities that are impacted by these addictive machines. The sinking lid is actually an opportunity to reduce pokie machines in our community. Less pokies machines mean less harm in our community. The shame and anti social behaviour of those that have gambling issues also means that its hard for people to reach out for help. Most money leaves the community and therefore our economy.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p style="text-align: center;">Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Anything that's going to solidify policy in a positive way that is going to reduce gambling harm is great for our community</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Its not exactly a Robin Hood scenario. Its more like steeling from the poor to help fundraise mainly sports activities for those that know how to fill in the complex forms for funding and can meet that criteria.</p>

Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: evelyn@ntota.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Wednesday, 18 November 2020 7:05:56 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	789111905205518
First name	Evelyn
Last name	Hiri-Gush
Email address	evelyn@ntota.co.nz
Postal address	30 BURTTTS ROAD DURIE HILL WHANGANUI 4500
Daytime phone number	0211898765
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	30 - 39 years
Ethnicity	Maori
Location	Bastia Hill / Durie Hill
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>When you weigh up the pros and cons, hands down I have seen the damage that pokies do and continue to do in our community (For those that are lower socio economic, it impacts them through poverty, hunger, violence, mental health and other addictions such as alcohol and drugs) If we can continue to make pokies redundant then we are moving in the right direction.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Improvement reducing harm to our community through policy is great. I would suggest consulting with those that are impacted on the most, Māori. it would be great to see WDC act as a good example of a how a treaty partner should be, have Māori part of the decision making process, not make decisions for Māori.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Lead by example and look to be the first City in New Zealand to be pokies free.</p>

Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: murphy.l@whs.ac.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 11:04:55 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	700111104205419
First name	Lisa
Last name	Murphy
Email address	murphy.l@whs.ac.nz
Postal address	Purnell St
Daytime phone number	0276669884
Organisation name	Whanganui High School
Your role	Director of Sport
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	40 - 49 years
Ethnicity	NZ European
Location	Springvale (Springvale West, Springvale East, Mosston)
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly disagree</p>
<p>Please provide reasons for your response</p>	<p>The WDC Policy will not decrease gambling and will have a huge impact on Club, Schools and other non-profit organizations within the region who obtain grants from pokie machine revenue currently. We would like to see the Machine numbers capped at November 2019 numbers.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Neither agree nor disagree</p>
<p>Please provide reasons for your response</p>	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may</p>	<p>An ongoing decrease in machine numbers will see revenue decrease for agencies to distribute back into the communities. Whanganui High School receives around \$30,000 of grants from this source, which helps enable our sports teams to compete at the NZ Secondary School Nationals in their chosen sport. Without this financial support our families would not be able to afford to pay for their son or daughter to go to these tournaments. Our families and teams also fundraise for the tournaments to help provide this experience for our talented students. We also run a very successful Sports Performance Pathway Programme which students are apart of</p>

have:	to develop their fundamental skills at a young age and further their sporting ability in the 5 years at WHS. Grants have supported our coach for us to be able to run this successful programme over the years. Capping the number of machines at the current level will at least enable the majority of clubs, schools and non profit organizations knowledge that the income gained will be distributed back into the local community rather than nationally and abroad.
Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: netball@netballwhanganui.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 11:07:03 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	012111107200319
First name	Kate
Last name	Osborne
Email address	netball@netballwhanganui.co.nz
Postal address	98 Peat Street Whanganui 4500
Daytime phone number	021 2955961
Organisation name	Netball Whanganui Inc
Your role	General Manager
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	30 - 39 years
Ethnicity	NZ European
Location	St Johns Hill / Otamatea
Would you be interested in being involved in further consultation opportunities with Council?	Yes
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly disagree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Netball Whanganui benefits greatly from gaming machine grant funding. It is the only way we are a financially viable sports organisation. We receive grant funds to pay wages, repairs and maintenance of our facilities at Laird Park and to supply gear to our representative teams. It also allows us to remain an affordable sport to our members. Without grant funding the fees to participate in netball will increase significantly therefore making participation in this sport a lot harder if not unaffordable for a large number of our community. Apart from gaming machine grant funding there is very minimal options to source funds for our operating costs. In 2019 community grants put \$1,571,651.00 into the Whanganui district which equated to 118 organisation's like ours financially benefiting. We would prefer to see the council implement a cap on gaming machines at the current number of 208 rather than a sinking lid policy. A cap would allow the current funding to continue whilst ensuring there are no further gaming machines installed within our region. We can appreciate issues around problem gambling however our understanding is that our regions rate is very low at 0.2% and this has not reduced even with a gaming machine reduction of 25% over the past 10 years.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; 	<p>Neither agree nor disagree</p>

<ul style="list-style-type: none"> Updating the structure; and Updating definitions, to make it clearer and more consistent. 	
Please provide reasons for your response	
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	
Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Will Johnston](#)
To: [!Policy Submissions](#)
Subject: FW: Class 4 Gambling Policy 2020 - submission
Date: Thursday, 19 November 2020 2:30:16 PM
Attachments: [Submission - Whanganui District Council Nov 2020.pdf](#)
Importance: High

From: Samantha Alexander <Sam.Alexander@lionfoundation.org.nz>
Sent: Thursday, 19 November 2020 2:29 PM
To: Will Johnston <Will.Johnston@whanganui.govt.nz>
Subject: Class 4 Gambling Policy 2020 - submission
Importance: High

Dear Will

Please find attached hereto our submission in respect of the current review of the Class 4 Gambling Policy.

We would appreciate an opportunity to make an oral presentation at the hearing of the review. I can be contacted on my mobile or by email.

It would be appreciated if you would kindly acknowledge receipt.

Many thanks.

Kind Regards

Sam Alexander

Compliance Manager

Mobile: 027 208 8588

Email: sam.alexander@lionfoundation.org.nz

Private Bag 106605, Auckland City, Auckland 1143
Level 2, Custom House, 50 Anzac Avenue, Auckland 1010
Office: 0800 802 908 | Fax: +64 9 488 7747 | Web: www.lionfoundation.org.nz

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THE LION FOUNDATION



Submission to WHANGANUI DISTRICT COUNCIL: Proposed
Gambling Venue Policy Class 4

NOVEMBER 2020

1. INTRODUCTION

This submission outlines The Lion Foundation's (TLF) response to the Whanganui District Council's Proposed Gambling Venues Policy.

The Lion Foundation is one of New Zealand's largest gaming machine societies by venue number, machine number and money returned to the community through grants. We currently operate 23 electronic gaming machines (EGMs) at two venues in the Whanganui District.

Formed in 1985, we have given back over \$950m in grants to local, regional and national community causes since our inception and over \$38m in our 2019/2020 financial year.

The Lion Foundation acknowledges the process undertaken by the Council Policy Advisors. Our New Zealand community funding model is one of the most efficient in the world and we support any review that allows consideration to be given to the total impact that gambling has on and within our communities. In New Zealand, gaming is not operated for commercial gain, but rather for community gain.

2. SUMMARY OF THE LION FOUNDATION'S POSITION

The Lion Foundation acknowledges that the Whanganui District Council is proposing to retain the sinking lid policy, making only minor amendments of a mostly non-substantive nature to the existing policy.

The Lion Foundation submits that given the current environment of high regulation and naturally reducing machine numbers as well as the fact that there is no evidence to support the finding that a reduction in venues or machines results in a reduction in problem gambling, it is appropriate to consider the replacement of the sinking lid policy with a cap set at the current number of gaming machine venues and electronic gaming machines operating within the district.

We would appreciate the opportunity to make an oral submission to Council at the hearing of this review.

3. ABOUT THE LION FOUNDATION (TLF)

The Lion Foundations' purpose, simply put, is to effectively and efficiently sustain community funding. Our aim is to protect and help people build better communities in a way that is safe, ethical, transparent, and consistent with the intent of the Gambling Act.

Our focus is on compliance and the reduction of gambling harm. The Lion Foundation is not here to grow or promote Gambling, but to ensure that the proceeds of Class 4 gambling is re-distributed to the communities in which they were generated in the most efficient and effective way possible.

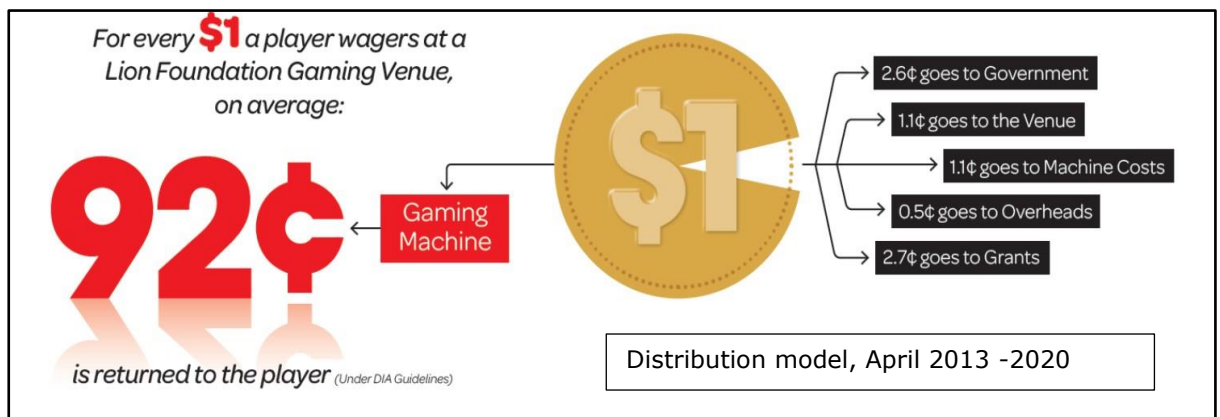
TLF aims to return at least 90% of funds back to the community of origin (where the funds were generated), with the remaining 10% of funds being returned to organisations providing a national benefit to all New Zealanders.

All local and regional grants are considered by a Regional Grants Committee.

We are a broad based, inclusive funder - that is, we fund a wide range of organisations across all community groups. It is our policy to distribute grants to the following community sectors:

- Sport: 40%
- Community, Arts & Culture: 30%
- Health : 15%
- Education: 15%

The Lion Foundation distribution of proceeds from its operations is:



The Problem Gambling Foundation often express the view that at least 60% of the revenue from the Gambling operation is retained by Class 4 Societies and used to operate their business. This is factually incorrect as can be seen from the above representation.

We are acutely aware of our responsibilities and obligations to prevent and minimise harm caused by problem gambling. We actively train all venue staff to recognise and provide help to problem gamblers; providing extensive information and material to assist with the prevention and reduction of harm caused by problem gambling.

4. THE LION FOUNDATION IN WHANGANUI DISTRICT COUNCIL

We currently operate 23 electronic gaming machines (EGMs) at two venues in the district – Sportz Bar and The Grand Hotel.

In the period **1 January 2019 – 31 December 2019** TLF distributed:

- **\$413,666** within the Whanganui District. The funds distributed can be represented as:
 - ❖ Sports - \$123,520
 - ❖ Community/Arts/Culture - \$124,849
 - ❖ Education – \$67,297
 - ❖ Health - \$98,000

A list of grants distributed in the Whanganui District is attached – Annexure A.

In the period **1 January 2020 – 30 October 2020** TLF distributed:

- **\$204,342** within the Whanganui District. The funds distributed can be represented as:
 - ❖ Sports - \$81,680
 - ❖ Community/Arts/Culture - \$32,803
 - ❖ Education – \$53,920
 - ❖ Health - \$35,939

A noticeable decline of grants distributed in in 10 months of a year affected by a global pandemic. A list of grants distributed in the Whanganui District is attached – Annexure B.

- In addition to the above amount, approximately 10% of funds generated in the Hastings District is allocated to grants distributed to organisations that provide a benefit to all New Zealand communities. Some organisations funded include:

Life Education Trust	Royal NZ Ballet	Graeme Dingle Foundation
New Zealand Red Cross	NZ Football	Surf Lifesaving NZ Inc
Special Olympics NZ	Netball NZ	Basketball NZ
Endometriosis N Z	Autism NZ	Royal NZ Plunket Soc Inc
Barnardo's N Z	NZ Spinal Trust	Mobility Assistance Dogs Trust
Assistance Dogs NZ	NZ Rugby League Inc	Paralympics NZ Inc

It is also important to note that TLF has stringent processes that are employed when a grant is assessed to ensure that grant funding lands where it is supposed to land.

In addition to the distribution of gaming proceeds to a variety of organisations, “pokies in pubs” contributes to the micro-economics of the District. We submit that it is also important to recognise the economic value currently generated by the gambling sector when considering whether or not a sinking lid policy is required and /or appropriate. Venues that are licenced to operate class 4 gaming machines provide employment to numerous residents of the district. Payments are also made to Venue Operators that host gaming machines. This further supports the hospitality industry within the district. Furthermore, organisations receiving grant funding spend these funds within their local community business organisations thereby adding a further layer of economic benefit.

5. PROPOSED POLICY

Retention of existing sinking lid -

- We request that the Council consider a more balanced approach to the Class 4 Gambling policy. Replacing the sinking lid policy with a cap at current numbers of venue and EGMs currently operating is appropriate given the significant measures that are already in place to minimise the harm from gaming machines. By way of example (not an exhaustive list):
 - ❖ There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine;
 - ❖ There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won;
 - ❖ Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination;
 - ❖ ATMs are excluded from all gaming rooms;
 - ❖ All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling;
 - ❖ All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling;
 - ❖ All gaming venues have a harm minimisation policy;
 - ❖ All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training;
 - ❖ It is not permissible for a player to play two gaming machines at once;
 - ❖ 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).
- Replacing the existing sinking lid policy with a cap equal to the current number of EGMs operating within the District will achieve the purpose of the Councils' policy as set out in clause 4 of the proposed policy.
- There is no evidence that a reduction in venues or machines results in a reduction in problem gambling¹.
- Gaming machine numbers and the number of gaming venues has declined steadily since 2003. Since the peak in Class 4 gaming machine numbers of 25,221 in 2003, the number of machines has declined steadily with the latest figures showing 14,828 machines as at 31 March 2020. Venues numbers have declined from over 2000 venues in 2003, to 1078 at March 2020.²

¹ National Gambling Study, MOH, 2012-2015. *The National Gambling Study (NGS) was the first NZ longitudinal study into gambling, health, lifestyles, and attitudes about gambling. Evidence to date shows that there is no correlation between the number of machines and the prevalence of people seeking help for problem gambling.*

Funded by the Ministry of Health, the NGS started in 2012 with a randomly selected national sample and followed those respondents over 4 years. The Study showed that despite a reduction in the number of machines from 18,000 in 2012 to 16,000 in 2018, the problem gambling risk did not change significantly from 2012 to 2015. Given population growth, per capita expenditure actually decreased over this period.

² Department of Internal Affairs – Quarterly statistics

- The New Zealand National Gambling Study: Wave 4 (2018) noted that the problem gambling rate risk did not change significantly from 2012 to 2015 and had remained the same over the last 10-15 years despite gaming machine numbers decreasing³.
- A more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups. Reducing gaming machine venues reduces casual and recreational play. This reduces machine turnover and the amount of funding generated for grant distribution.
- Figures from the Ministry of Health's Intervention Client data⁴ report that in the Whanganui District Council a total of 16 clients have sought help in the period July 2017 – June 2018; 7 of which presented as *new clients*. These figures exclude those classified as brief intervention clients. Unfortunately, no figures are available for the 2018-2019 period as at time of writing this submission.
- Of great concern is the fact that problem gambling associated with offshore based online gambling is growing exponentially. Offshore online gambling providers do not have to operate in accordance with the Gambling Act, do not offer any harm minimisation features to protect players; do not contribute to New Zealand communities.
- Furthermore, offshore based online gambling poses considerable risk in that:
 - ❖ It is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
 - ❖ Has no restrictions on bet sizes;
 - ❖ Has no capacity for venue staff to observe and assist people in trouble;
 - ❖ Reaches new groups of people who may be vulnerable to the medium;
 - ❖ Provides no guaranteed return to players;
 - ❖ Is more easily abused by minors;
 - ❖ Is unregulated, so online 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.

Relocation Policy

TLF acknowledges that the provisions pertaining to potential relocation of Class 4 Venues are not affected by the current review.

Venue relocation is accepted to be an effective harm minimisation tool – it allows for venues to relocate from high deprivation areas to more suitable areas. In addition, a venue relocation policy

- ❖ Enables venues to re-establish after a natural disaster, flood, or fire.
- ❖ Enables venues to move out of earthquake-prone and dangerous buildings.
- ❖ Enables venues to move to new refurbished and fit-for-purpose premises.
- ❖ Creates fairness in cases of public works acquisition or lease termination.
- ❖ Prevents landlords demanding unreasonable rentals.

³ The New Zealand National Gambling Study: Wave 4 (2015), final report March 2018

⁴ https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#total_assisted Refer table 10

6. HARM MINIMISATION

The Lion Foundation is committed to preventing and minimising harm from gambling, including problem gambling, whilst facilitating a responsible and legal form of recreational gambling.

We are committed to creating safe gambling environments in all our venues, and minimising the harm caused by problem gambling. Each year the Class 4 Gambling industry contributes significant amounts to a problem gambling fund. This funding allows the Ministry of Health to support and treat gambling addiction and to increase public awareness.

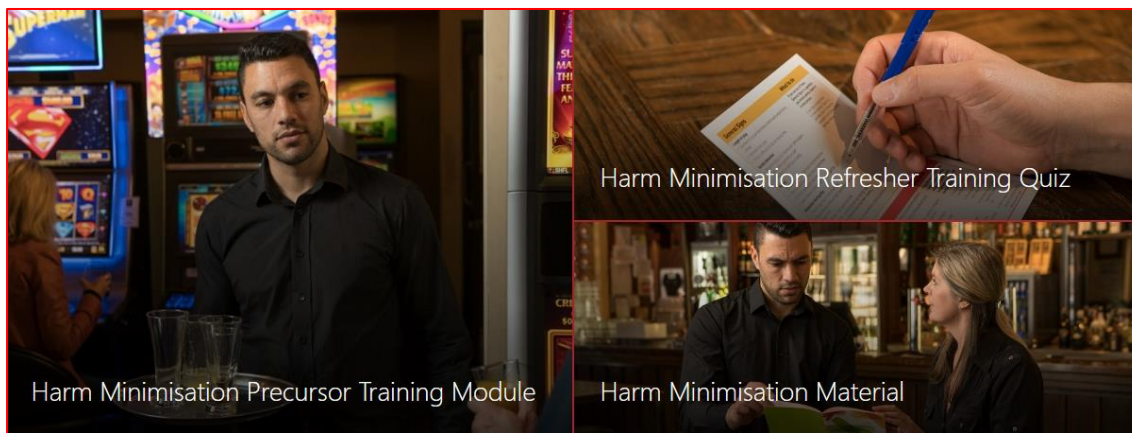
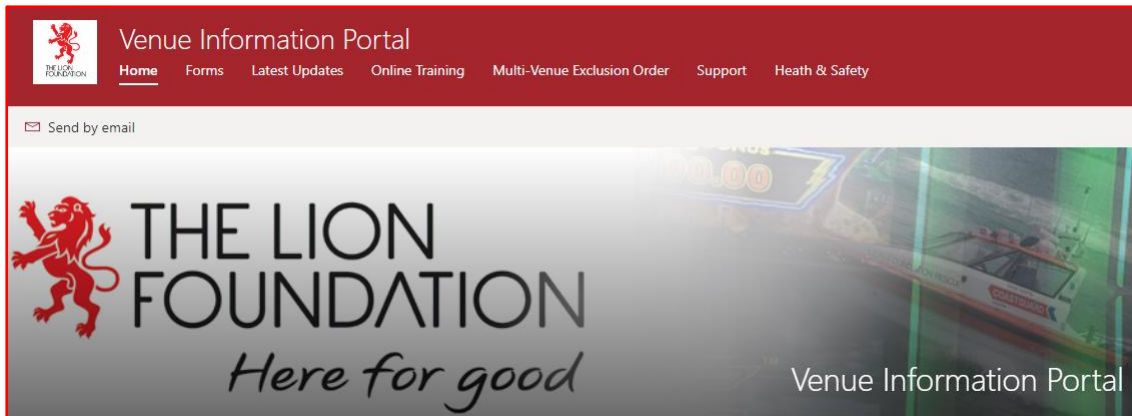
We continue to have strong relationships with service providers such as The Salvation Army Oasis Centre, Problem Gambling Foundation, Abacus (problem gambling training provider), and agencies such as the Health Promotion Agency. Our Venue Operators and their staff are proactive in their referring potential problem gamblers to the various service providers.

We ensure our Venue Operators, and their gaming staff are fully trained in all relevant areas of harm minimisation. All venue staff involved in gaming at The Lion Foundation venues undertake frequent face to face training courses (including refresher courses) run by experienced TLF personnel. The training courses have been developed by industry professionals with a wealth of experience in the gaming and hospitality sectors. The training focuses on problem gambling – how to observe and identify problem gamblers, how to support problem gamblers and how to ensure that harm is minimised. Gaming rooms may not be operated unless a person fully trained in harm minimisation is on duty. In addition to the ongoing training, our industry trained staff are constantly in contact with the venue staff and operators and are available to assist with a variety of matters at a moment's notice – either in person or telephonically.

All venue staff are constantly reminded of their obligations in terms of the Harm Minimisation Policy. The Department of Internal Affairs has approved the TLF Harm Minimisation Policy. Venues and their staff are also subject to compliance inspections by the DIA.

The Lion Foundation offers a range of harm minimisation material to the gambler – including, but not limited to, wallet cards with information for potential problem gamblers, signage in and around gaming rooms from the Health Promotion Agency, etc. Venue staff interaction and supervision and observation of patrons is also key to the minimisation of harm. Important harm minimisation information has been translated into 8 different languages by The Lion Foundation and is available at the venues.

By accessing a customised *Venue Information Portal* (screenshot extracts below), venue personnel have immediate access to a suite of harm minimisation products. These include educational videos, the suite of Health Promotion Agency material, training aids, industry updates, Health and Safety material. A Gambling Harm Service referral form is immediately accessible and assists problem gamblers receive the help that they require from the Salvation Army and other service providers.



We support the introduction of new harm minimisation measures, provided they are based on good evidence that they will have a positive impact on the reduction in harm caused by gambling.

7. SOCIAL COSTS OF GAMBLING - PROBLEM GAMBLING IN CONTEXT

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 on 25 March 1988, 32 years ago.

The social costs associated with problem gambling are of a much smaller magnitude than alcohol, tobacco and other drugs. Problem gambling is 1 to 2 percent of the social cost of alcohol, tobacco or other drugs.⁵ The costs of problem gambling are not to be trivialised, but the policy formulated to address this issue should be based on the evidence of its prevalence and impact, and considered in light of the magnitude and response to other products where there is harmful use.

The prevalence of problem gambling is low and has dropped from a rate of 0.4% of the adult (over 18 years and over) population in 2006/7 to 0.2% in 2015⁶.

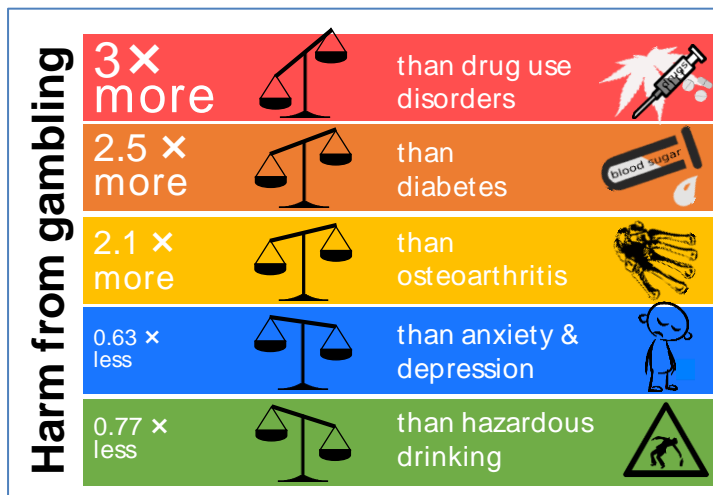
⁵ BERL Report: Maximising the Benefits to Communities from New Zealand's Community Gaming Model

⁶ Problem Gambling in New Zealand, findings from the NZ Health Survey, Ministry of Health, March 2018

All gaming machine societies contribute to a problem gambling fund. This fund provides funding to the Ministry of Health to support and treat gambling addiction and to increase public awareness. As previously stated, a very well-funded problem gambling treatment service exists.

The Problem Gambling Foundation (and other opponents) relied on a report, titled “*Measuring the Burden of Gambling Harm*” which was produced for the Ministry of Health by Central Queensland University (CQU) and Auckland University of Technology (AUT) in May 2017.

The representation below has been used to represent the key findings of the report by PGF when advocating for sinking lid policies:



The Gaming Machine Association of New Zealand (GMANZ) commissioned a ‘*two-sided review of a one-sided analysis of gambling*’ – a rigorous, balanced and comprehensive assessment of the Burden of Harm report. In August 2019, TDB Advisory⁷ concluded that **these outlandish comparisons were made possible by a long line of deliberate selection biases and errors**. The errors revealed by the TDB Advisory review include either deliberately or by mistake using a biased population sample (participants were not randomly selected), attributing all harms to gambling and none to associated behaviours (such as smoking), and treating all harm as stemming 100% from gambling rather than allowing for the use of gambling as a coping mechanism or as a symptom of harms rather than the cause.

In June 2020, the **New Zealand Taxpayers Union** issued a press release:

*Union spokesperson Louis Houlbrooke says: “This deeply flawed report by Central Queensland University (CQU) and Auckland University of Technology (AUT) has been the basis of gambling policy advice from the Ministry of Health for several years. An independent review by TBD Advisory has found that Ministers have been consistently misled in relation to the number of problem gamblers and the overall impact of gambling on Kiwis' well-being, based on this one report.”*⁸

⁷ http://www.gamblinglaw.co.nz/download/TDB_Advisory_Report.pdf

⁸ <https://www.scoop.co.nz/stories/PO2006/S00269/315000-spent-on-gambling-report-is-a-busted-flush.htm>

We would request that the decision makers, in arriving at a balanced decision, at least take the time to read the TBD Advisory report.

8. COMMUNITY FUNDING

In 2019, approximately \$290 million was returned to New Zealand communities.

There is a significant reliance on gaming trusts for community funding. In the absence of any **sustainable alternative**, this has become even more apparent as NZ grapples with the Covid-19 pandemic: -

Stuff.co.nz (3 April 2020) Sport Minister Grant Robertson: "One important community funding source that has dried up under COVID-19 is gaming machines and local trusts, which support grassroots programmes across most sports. I've been talking to the Minister of Internal Affairs about the way in which the gaming trusts, because clearly, there has been a significant decline in revenue through gambling. It will take some time to piece together what that package would look like, but we certainly understand the impact it's having, particularly on community sport, to not have that gaming-trust funding."

Stuff.co.nz (9 April 2020) Andrew Pragnall (CE – NZ Football): Gaming machines could make up 20 to 30 percent of a club or Federation's revenue according to Pragnall and he was worried where that would leave some of them after the pandemic.

Stuff.co.nz (16 April 2020) : A halt on gambling during Covid-19 lockdown will see community groups miss out on millions of dollars' worth of funding.

The full effects of Covid-19 have yet to become evident – more especially after the resurgence of the virus in our communities in recent days. It is still very much unknown whether or not hospitality venues will be able to keep their doors open post the cessation of various Government subsidies. Class 4 Gaming provides employment opportunities for members of the community - including local hospitality businesses, trusts and societies, equipment providers and technicians – a significant number of jobs in our cities, towns and communities.

9. A RECENT DEVELOPMENT

The Salvation Army and Problem Gambling Foundation have recently released a report commissioned from the New Zealand Institute of Economic Research (NZIER)⁹. This independent report suggests that there would be significant economic benefit to the retail sector in both income and job creation if spending on class 4 "pokies" was stopped. The report estimates that this additional retail spending would generate an additional 1,127 full-time equivalent jobs for 1,724

⁹ The retail employment and tax costs of Class 4 gambling in New Zealand - June 2020; NZ Institute of economic Research (Inc)

workers, along with an additional \$58m of GST revenue and additional income tax of \$7m from the retail spend.

Unfortunately, however, the economic value **currently generated** by the class 4 gambling sector has not been considered and was in fact acknowledged to have been outside of the scope of the report. We submit that the report is therefore a misrepresentation of the net value of such a move, given that it takes no account of the value that would be lost. What the Salvation Army and Problem Gambling Foundation appear to be saying is that it will be acceptable to deprive the charitable and not for profit sectors of funding and valuable employment opportunities in favour of a profit driven commercial retail sector. This is somewhat disingenuous.

The authors draw a conclusion that the increased retail spending would then result in the retail sector channelling their increased profits into things like sports sponsorship. It is, however, more likely that any increased profits from the retail spending would be retained by the business owners, many who are large corporates, based offshore.

The report fails to consider the freedom of adult New Zealanders to spend money on a legalised form of entertainment. That spending provides them with legal entertainment, relaxation and social interaction. Those benefits would be lost if people were not able to spend their money on Class 4 gambling. The report also disregards the fact that whilst the Class 4 Sector is legally required to distribute funding from gaming proceeds, there is no such obligation, legal or otherwise, on retail businesses.

10. CONCLUSION

It is our submission that the Council's policy needs to optimise the balance between reasonable controls over the incidence of problem gambling against the generation of funds for the community from legitimate gaming.

Finally, we are not here to grow gambling; we believe though that pragmatic use of funds generated by this legalised form of entertainment make a hugely positive contribution to community life across New Zealand.

For further comment or information please contact Tony Goldfinch at The Lion Foundation on 027 565 3677: or email: Tony.Goldfinch@lionfoundation.org.nz; or Samantha Alexander on 0272 088 588 or email: Sam.Alexander@lionfoundation.org.nz;

Annexure A – Grants 1 January 2019 – 31 December 2019

Whanganui District Council	Community - Culture - Arts	Whanganui Volunteer Centre Trust	\$3,393.00
		Wanganui Enterprises Trust	\$14,000.00
		Matipo Community Development Charitable Trust	\$20,000.00
		Whanganui Literary Festival Trust	\$3,000.00
		Citizens Advice Bureau Inc Whanganui	\$5,000.00
		Community House Whanganui Assn Inc	\$5,000.00
		Whanganui Peoples Centre	\$5,000.00
		Womens Network (Wanganui) Inc	\$4,000.00
		Brass Wanganui Inc	\$4,000.00
		Wanganui Toy Library Inc	\$1,665.00
		Hakeke Street Community Centre	\$1,630.00
		Wanganui Community Arts Centre Trust	\$2,415.00
		Whanganui Creative Space Trust	\$6,000.00
		Christian Social Services (Whanganui)	\$8,000.00
		Koriniti Marae Maori Reservation Trust	\$40,000.00
	Bason Botanic Gardens Trust	\$1,746.00	
	Subtotal		\$124,849.00
	Education	Whanganui Collegiate School	\$6,929.00
		Tawhero School	\$8,000.00
		Whanganui High School	\$3,700.00
Whanganui Intermediate School		\$3,200.00	
Birthright Wanganui Inc		\$10,000.00	
Cullinane College		\$7,000.00	

	St Johns Hill School	\$5,000.00
	Kaitoke School (Wanganui)	\$1,129.00
	Springvale Playcentre	\$1,375.00
	Whangaehu School	\$5,000.00
	Family Support Services Whanganui Trust	\$10,000.00
	Young Mens Christian Association Central Inc	\$5,000.00
	N Z P F - Rapanui Brunswick Playcentre	\$964.00
	Subtotal	\$67,297.00
Health	Whanganui Safe and Free Inc	\$13,000.00
	Brain Injury Assn Whanganui Inc	\$7,000.00
	Mental Illness Survivors Team Inc	\$5,000.00
	Alzheimers Wanganui Inc	\$7,000.00
	Hearing Assn Wanganui Branch Inc	\$7,000.00
	CCS Disability Action Whanganui Inc	\$5,000.00
	Age Concern Whanganui Inc	\$9,000.00
	Hospice Whanganui	\$25,000.00
	KidsCan Charitable Trust	\$10,000.00
	Wanganui Group of the Riding for the Disabled Assn Inc	\$10,000.00
	Subtotal	\$98,000.00
Sport	Wanganui Roller Sports Inc	\$4,000.00
	Sailability Whanganui Trust	\$7,000.00
	Gonville-Castlecliff Bowling Club Inc	\$5,000.00
	Wanganui Marist Rugby Football Club Inc	\$10,000.00
	Mid Central Zone of N Z R L Inc	\$10,000.00
	Castlecliff Golf Club Inc	\$2,000.00
	Wanganui Rugby Football Union Inc	\$25,000.00
	Awa Kings Muay Thai Club Inc	\$4,000.00

	Central Squash Assn Inc	\$3,500.00
	Aramoho Wanganui Rowing Club Inc	\$5,000.00
	Wanganui Squash Rackets Club Inc	\$5,000.00
	Ratana Paa Kaihoe Trust	\$10,000.00
	Wanganui Sailing Club Inc	\$5,000.00
	Union Boat Club Inc	\$11,220.00
	Bowls Wanganui Inc	\$1,800.00
	Wanganui Football Charitable Trust	\$15,000.00
	Subtotal	\$123,520.00
Subtotal		
Total		\$413,666.00

Annexure B – Grants 1 January 2019 – 30 October 2020

Whanganui District Council	Community - Culture - Arts	Wanganui A & P Assn Inc	\$4,000.00
		Whanganui Repertory Theatre Inc	\$7,289.00
		Community House Whanganui Assn Inc	\$10,000.00
		Hakeke Street Community Centre	\$1,514.00
		Wanganui Competitions Soc Inc	\$10,000.00
	Subtotal		\$32,803.00
	Education	Mosston School	\$25,000.00
		Churton School	\$15,000.00
		Whanganui High School	\$4,000.00
		W M F K A - St Johns Hill Kindergarten	\$6,401.00
		Whanganui Collegiate School	\$3,519.00
	Subtotal		\$53,920.00
	Health	Brain Injury Assn Whanganui Inc	\$5,000.00
		CCS Disability Action Whanganui Inc	\$6,000.00
		Wanganui Group of the Riding for the Disabled Assn Inc	\$7,939.00
		Alzheimers Wanganui Inc	\$7,000.00
		Wanganui Multiple Sclerosis Soc Inc	\$10,000.00
	Subtotal		\$35,939.00
	Sport	Central Squash Assn Inc	\$2,625.00
		Wanganui Cricket Assn Inc	\$14,000.00
		Wanganui Sailing Club Inc	\$1,642.00
		Aramoho Wanganui Rowing Club Inc	\$5,000.00
		Whanganui (N Z) Masters Games Trust	\$45,000.00
Athletics Manawatu Wanganui Inc		\$4,000.00	

Gambling Venues Sub: 024

		Wanganui Roller Sports Inc	\$4,413.00
		Wanganui Marist Rugby Football Club Inc	\$5,000.00
	Subtotal		\$81,680.00
Subtotal			
Total			\$204,342.00

From: [Whanganui District Council](#)
To: bridget.belsham@wanganuirugby.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 2:59:47 PM



Submission: Gambling Venues Policy

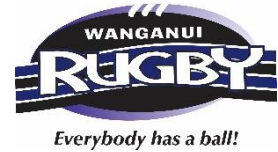
Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	983111459204619
First name	Bridget
Last name	Belsham
Email address	bridget.belsham@wanganuirugby.co.nz
Postal address	PO BOX 4213 WHANGANUI WHANGANUI 4541
Daytime phone number	0272859010
Organisation name	Wanganui Rugby Football Union Inc.
Your role	Chief Executive Officer
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	40 - 49 years
Ethnicity	NZ European
Location	Springvale (Springvale West, Springvale East, Mosston)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

KEY ISSUES	
Current Policy	
<p>That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly disagree
Please provide reasons for your response	Please see attached document.
Updates to the Policy	
<p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Neither agree nor disagree
Please provide reasons for your response	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	
Supporting documents	WDC - Gambling Submission.pdf - Received
I would like to speak in support of my submission	Yes
Submission method	Online

WANGANUI RUGBY FOOTBALL UNION

Submission on Review of Whanganui District Council Gambling Venue Policy



Wanganui Rugby Football Union strongly oppose the 'Sinking Lid' policy currently being reviewed and request a 'Cap' at the current numbers of 208 gaming machines.

Wanganui Rugby's main purpose is to foster & develop rugby in our community and with over 3,000 participants involved in rugby (Players, Referees, Coaches & Administrators), we need funds to operate our core business.

Each year we are very fortunate to obtain between \$110-\$150k in funding from Community Grant funders who obtain their funding from gaming machines.

The majority of this funding is used as a contribution towards staff salaries which is our best resource. To ensure we continue to promote and deliver rugby to our Coaches, Players, Referees, Administrators, Schools, Clubs and our wider community it is imperative that we retain all of the staff roles we currently have.

We also have the challenge of servicing a large geographical area which includes Taihape, Waiouru, Ohakune, Raetihi, Ratana, Marton, Waverley & Central Whanganui which comes with associated costs. Funding towards Operational Expenses such as Ground Hireage, Electricity, Office Lease, Vehicle Lease etc is also applied for each year to assist with these costs.

If we did not obtain assistance towards some of these costs including staff salaries, it would mean reduced staff numbers and limited programmes being offered to our community.

We also lease a number of grounds off the Whanganui District Council and we would not be able to retain our current usage or use the grounds at all, which would also mean loss of income for the Whanganui District Council.

With already significantly reduced funding from NZ Rugby & Commercial Sponsors, due to the impacts of Covid-19, it would be extremely difficult to obtain replacement funding for Community Grants at this level. Wanganui Rugby is heavily reliant on Community Grant funding to service our community and we would need to seriously reassess what we can provide, if this funding was reduced considerably or removed entirely.

Rugby provides both physical & mental health benefits, which improves the overall wellbeing of our Whanganui community. During these tough times, sport has given people an opportunity to keep motivated and get fit, spend time with their friends and families and get back to some normality and we do not want this to change.

It is critical that the Whanganui District Council seriously considers placing a 'Cap' on the current gaming machine numbers instead of imposing a 'Sinking Lid' policy. I am happy to make an oral submission on behalf of the Wanganui Rugby Football Union as required.

A handwritten signature in blue ink that reads 'Belsham'.

Ngā mihi
Bridget Belsham
CHIEF EXECUTIVE OFFICER

From: [Whanganui District Council](#)
To: alaska@ntota.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 3:49:55 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	415111549205419
First name	Alaska
Last name	Dobbs
Email address	alaska@ntota.co.nz
Postal address	55 PATERSON STREET ARAMOHO WHANGANUI 4500
Daytime phone number	020 40992888
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	18 - 29 years
Ethnicity	Maori
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>The less pokies in Whanganui, the better. Māori are the ones that are hit hardest by these addictive machines in lots of negative ways.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Mitigating any risk of loopholes and being clear and consistent is great.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Become the first city in NZ to be pokies free.</p>
<p>Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p>Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: emzkaraz@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 4:07:11 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	454111607201019
First name	Emily
Last name	Kara
Email address	emzkaraz@gmail.com
Postal address	13 MAIRE STREET GONVILLE WHANGANUI 4501
Daytime phone number	0226952447
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	18 - 29 years
Ethnicity	Maori
Location	Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
Would you be interested in being involved in further consultation opportunities with Council?	No

<p align="center">KEY ISSUES</p>	
<p align="center">Current Policy</p> <p align="center">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Pokies are harmful and addictive. I have seen plenty of whānau struggle in many ways to overcome the pain that these machines cause.</p>
<p align="center">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>clearer is good</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>We don not need pokies in our community.</p>
<p align="center">Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p align="center">Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: kaynaririnui@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 4:17:21 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	623111617202019
First name	Kayna
Last name	Ririnui
Email address	kaynaririnui@gmail.com
Postal address	2 B PATAPU STREET WHANGANUI EAST WHANGANUI 4500
Daytime phone number	02040377852
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	Maori
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No

KEY ISSUES	
<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly agree
Please provide reasons for your response	In my experience pokies are harmful and addictive
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Strongly agree
Please provide reasons for your response	updates are good
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	pokies are harmful and addictive
Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: tahuparaebutlertrish2@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 8:10:14 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	171112010201319
First name	Trish
Last name	Tahuparae
Email address	tahuparaebutlertrish2@gmail.com
Postal address	26 NIXON STREET WHANGANUI EAST WHANGANUI 4500
Daytime phone number	0212152847
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Pokies devastate our communities</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>makes it better to understand</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>You can't win on these machines...false hope of winning big</p>
<p style="text-align: center;">Supporting documents</p>	<p>File(s) not provided</p>
<p style="text-align: center;">I would like to speak in support of my submission</p>	<p>No</p>
<p style="text-align: center;">Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: savaanah007@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 8:19:15 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	266112019201419
First name	Marama
Last name	Akapita
Email address	savaanah007@gmail.com
Postal address	71 CARLTON AVENUE TAWHERO WHANGANUI 4501
Daytime phone number	0212334019
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Pokies are a waste of time and destroy our whānau</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Once your hooked on these machines its hard to ask for help and even harder on your wider whānau. They are the ones that suffer the most. The lies, and disruption is heart breaking adding stress is not healthy for our kids especially.</p>
<p style="text-align: center;">Supporting documents</p>	<p>File(s) not provided</p>
<p style="text-align: center;">I would like to speak in support of my submission</p>	<p>No</p>
<p style="text-align: center;">Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: ragdog@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 8:29:33 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	738112029203219
First name	Aaron
Last name	Chadwick
Email address	ragdog@gmail.com
Postal address	33 RANGIORA STREET CASTLECLIFF WHANGANUI 4501
Daytime phone number	0221396263
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>We need less venues and preventing more of these toxic machines in is a must</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Improvement</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Get rid of them all. The do way more harm than good. In my experience those that feed these machines do not benefit. Steel from the poor and give to the rich.</p>
<p style="text-align: center;">Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p style="text-align: center;">Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: dannyhealey85@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 8:50:12 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	744112050201119
First name	Danny
Last name	Healey
Email address	dannyhealey85@gmail.com
Postal address	25 TONGARIRO STREET CASTLECLIFF WHANGANUI 4501
Daytime phone number	0224322719
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Close them all down. Waste of money</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Pokies are to addictive</p>
<p style="text-align: center;">Supporting documents</p>	<p>File(s) not provided</p>
<p style="text-align: center;">I would like to speak in support of my submission</p>	<p>No</p>
<p style="text-align: center;">Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: jaimchadwick358@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 8:54:28 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	491112054202719
First name	Jay
Last name	Chadwick
Email address	jaimchadwick358@gmail.com
Postal address	28 WIKITORIA ROAD PUTIKI WHANGANUI 4501
Daytime phone number	0212594916
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p style="text-align: center;">Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p style="text-align: center;">Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	
<p style="text-align: center;">Supporting documents</p>	<p style="text-align: center;">File(s) not provided</p>
<p style="text-align: center;">I would like to speak in support of my submission</p>	<p style="text-align: center;">No</p>
<p style="text-align: center;">Submission method</p>	<p style="text-align: center;">Online</p>

From: [Whanganui District Council](#)
To: tysontauri1@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 9:08:24 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	901112108202319
First name	Tyson
Last name	Tauri
Email address	tysontauri1@gmail.com
Postal address	6 FRASER PLACE ARAMOHO WHANGANUI 4500
Daytime phone number	0226917157
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	<p>Less venues and machines the better. These things are so addictive.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p style="text-align: center;">Please provide reasons for your response</p>	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Pokies wreck families.</p>
<p style="text-align: center;">Supporting documents</p>	<p>File(s) not provided</p>
<p style="text-align: center;">I would like to speak in support of my submission</p>	<p>No</p>
<p style="text-align: center;">Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: adrian.campbell@printing.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 9:23:37 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	534112123203619
First name	Adrian
Last name	Campbell
Email address	adrian.campbell@printing.com
Postal address	110 CAMPBELL STREET WHANGANUI 4500
Daytime phone number	0273562261
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	Maori
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>We don't need more venues or pokies in Whanganui.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Policy improvement is great.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Pokies are addictive</p>
<p>Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p>Submission method</p>	<p>Online</p>

From: [Lauren Tamehana](#)
To: [!Policy Submissions](#)
Subject: Submission on Gambling Policy November 2020 final
Date: Thursday, 19 November 2020 10:49:43 PM
Attachments: [Submission on Gambling Policy November 2020 final.docx](#)

Kia ora

Please see the attached submission from Safer Whanganui

Nga mihi

Lauren

Lauren Tamehana | Community Wellbeing Manager

OUR VALUES

Positive & Encouraging | Collaborative Brilliance | Make Great Happen



Safer Whanganui Submission on Whanganui District Class 4 Gambling and TAB Policy Submission:

Introduction:

Safer Whanganui is a community led Council mandated coalition that provides leadership and direction to achieve a safer community. Safer Whanganui achieved international accreditation in 2010 and reaccreditation in 2016. Safer Whanganui is made up of a Steering Group with 16 members of key government, non- government and community agencies and eight Reference Groups;

Whanganui District Council already has a sinking lid policy and we encourage the council to not only maintain the sinking lid but to also strengthen it. We are asking council to consider adding a clause that provides no relocations and club mergers to enhance its sinking lid. Electronic Gaming Machines (EGMs) or 'pokies' that are in pubs, clubs and TABs are the most harmful form of gambling in New Zealand. Safer Whanganui advocates for sinking lid policies, but we believe even this policy does not go far enough to minimise the harm from gambling in our communities.

Gambling machine numbers in the Whanganui district are reducing but only in small numbers, from 235 to 208 over the last five years. Thirteen of Whanganui's fourteen pokie venues are situated in the very high deprivation areas of Whanganui. Nationally, we continue to have 50% of pokies in our most deprived communities; 30-60% of the money being lost on pokies by problem gamblers, and a national spend that has been trending upward since 2014.

The extent of gambling harm in Aotearoa is often misrepresented when it is said problem gambling is limited to 0.2% of the population. The Ministry of Health's *Strategy to Prevent and Minimise Gambling Harm 2019/20 to 2021/22*, estimates 252,000 people are being harmed, which is the population of Hamilton, our fourth largest city. An effective policy at a council level is critical and importantly, it is an area over which Council can exercise its authority.

Funding communities based on a model that relies on our lowest income households putting money they cannot afford to lose into pokie machines is unethical and inequitable; disproportionately impacting Māori and Pacific peoples who generally live in the areas where the majority of these machines are situated.

What is happening nationally?

In 2019, collectively across the country \$939 million was spent in pokie machines in pubs, clubs and TABs, however only \$241 million was paid out in grants to community and sports groups. The table below shows where the funding went.

New Zealand 2019 Funding Areas	Total Dollars Paid Out
Community	\$120,812,075
Sports	\$120,444,774
Total	\$241,256,849

Four of the community groups received \$1 million dollars or more. Of the sports grants 19 million went to rugby, including 1.5 million to Auckland Rugby union.

Gambling in Whanganui

Based on Census 2018 population data, and gambling statistics from the Department of Internal Affairs (DIA), Whanganui currently has:

- 14 gambling venues hosting 208 pokies – a machine for every 187 adults in the District.
- Of the 14 venues, thirteen are in areas where the deprivation level is categorised as very high: the remaining one in a medium high area.
- In 2019 the total revenue collected from pokies in Whanganui was \$10,735,860 million.

A quick review of the funding granted by Gaming Machine Trusts in Whanganui showed that for 2019 there was \$626,440.00 returned to the community (this does not include funding that went to national organisations and trickled down to Whanganui) There are three gaming Trusts that operate pokies machines in Whanganui venues.

Trust	Sport	Community	Education	Council
NZCT (6 venues)	\$211,078.00	\$35,475.00	\$6,000.00	
Lion Foundation (2 venues)	\$167,953.00	\$118,080.00	\$68,029.00	\$19,825.00
Grassroots * (1 venue)				
	\$379,031.00	\$153,555.00	\$74,029.00	\$19,825.00

- Did not pay out to any Whanganui organisations in 2019

We need our community to understand the harm that is caused by pokie machines, yes they do provide support within the community to sports groups, education and social service organisations but the money coming back into the community in the way of grants is nowhere near what is going out. Imagine what a difference the \$10 million would make if it stayed within our community. Whanganui District Council has a good policy but if it is changed to a comprehensive sinking lid policy where if a venue closes and the pokies cannot go to another venue and no new Class 4 licences can be issued then we will have a policy that is really working towards an equitable reduction in harm for our community.

Nga mihi

Lauren Tamehana on behalf of Safer Whanganui

From: [Whanganui District Council](#)
To: wanganuisoftball@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Thursday, 19 November 2020 11:44:21 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	931112344202019
First name	Lindsay
Last name	Edwards
Email address	wanganuisoftball@gmail.com
Postal address	71 Portal Street
Daytime phone number	021 674 624
Organisation name	Whanganui Softball Association Inc
Your role	Secretary
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	60 years or over
Ethnicity	NZ European
Location	Bastia Hill / Durie Hill
Would you be interested in being involved in further consultation opportunities with Council?	Yes
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly disagree</p>
<p>Please provide reasons for your response</p>	<p>The present 208 gaming machines and 14 venues for our area, provide a reasonable return by way of payments made. To continue to take those machines and the capability of their delivery of funds, would seriously jeopardise the amount of funding that we presently enjoy. Already there are nearly 100 less machines than in 2003. This policy should now be capped, to prevent any further reduction in funding through the gaming machine resource. Whanganui Softball would be nowhere right now if it had not been for funding prived through these machines. Presently we enjoy ownership of our own clubrooms, the fencing and infrastucture at our ballpark, and have benefitted in maintenance and repair costs to ensure the facilities are maintained up to acceptable standards. This has all been trough NZCT funding, accounting for grants in excess of \$150,00.00 over the past 12 years. Through their help, the complex at 29 Puriri Street, initiated by the Braves club, and in later years finished off by the Clubs within the Association, has been saved. From time to time, the NZCT have also helped out with smaller grants, allowing payments of key costs, and by way of assistance with uniform and travelling costs for representative teams opver the years. Throughout al of this, Whanganui now boasts a user friendly, safe and secure family oriented facility, the envy of a number of much larger Softball Associations than ours. All this only possible through funding - the bulk of which has been provided by the revenue</p>

	collected by NZCT through the gaming machines.
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Strongly disagree
Please provide reasons for your response	The Policy should in our view be "capped" No More machines, and in the event of losing any of the machines through attition or whatever, then replacement machines can be bought. Cap at 203 with 14 venues.
Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:	Replacing this sort of funding agency with any other, beggars belief. There is no corporate or Governmental agency that could match the output of the money raised, for giving away to worthy recipients
Supporting documents	File(s) not provided
I would like to speak in support of my submission	Yes
Submission method	Online

From: [Whanganui District Council](#)
To: tamehana71@xtra.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 6:54:51 AM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	897110654205020
First name	Hone
Last name	Tamehana
Email address	tamehana71@xtra.co.nz
Postal address	71 Putiki Drive Putiki
Daytime phone number	0272949471
Organisation name	Putiki Marae
Your role	Chairperson
Have you submitted to the Whanganui District Council before?	Yes
Gender	Male
Age group	
Ethnicity	Maori
Location	Putiki
Would you be interested in being involved in further consultation opportunities with Council?	Yes
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>We are concerned about the harm to Maori from gambling and the inequitable distribution of funds back into our community that does not end up in the high deprivation communities that the money came from.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Yes we would like to see a policy that is strong and continues to reduce any opportunity for more machines in our community</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	
<p>Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p>Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: jay@ntota.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 12:33:39 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	562111233203820
First name	Jay
Last name	Rerekura
Email address	jay@ntota.co.nz
Postal address	11 TIPAI STREET WHANGANUI EAST WHANGANUI 4500
Daytime phone number	
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Alcohol drugs and pokies are connected to negative outcomes in Whanganui</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Better policy is great</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Alcohol drugs and pokies are connected to negative outcomes in Whanganui</p>
<p>Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p>Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: andre@ntota.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 12:40:11 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	263111240201020
First name	Andre
Last name	Taylor
Email address	andre@ntota.co.nz
Postal address	5 TUI PLACE GONVILLE WHANGANUI 4501
Daytime phone number	0275556222
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	40 - 49 years
Ethnicity	Maori
Location	Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
Would you be interested in being involved in further consultation opportunities with Council?	No

<p align="center">KEY ISSUES</p>	
<p align="center">Current Policy</p> <p align="center">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>A sinking lid is a must. Reducing venues and pokies machines are essential to reducing the harm that pokies cause in our community</p>
<p align="center">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Policy updates are great.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Reducing gambling harm needs an holistic approach. A quadruple bottom line lens is essential to reducing gambling harm.</p>
<p>Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p>Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: Charles@ntota.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 1:26:16 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	321111326201520
First name	Charles
Last name	Chadwick
Email address	Charles@ntota.co.nz
Postal address	142 GUYTON STREET WHANGANUI 4500
Daytime phone number	0212278884
Organisation name	Nga Tai o Te Awa
Your role	Health Promotion
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	
Ethnicity	Maori
Location	Whanganui Central (Laird Park, Whanganui Central, Whanganui Collegiate)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

<p align="center">KEY ISSUES</p>	
<p align="center">Current Policy</p> <p align="center">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Sinking lid is currently the best option of reducing gambling machines within our community.</p>
<p align="center">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>Please consider me when these is done.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>I would like to give a verbal submission and talk about the many experiences that the community has shared with me both good and bad.</p>
<p align="center">Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>Yes</p>
<p align="center">Submission method</p>	<p>Online</p>

Whanganui District Council (WDC) is seeking feedback on its proposed gambling venues policy on the 'pokies'. The WDC's current policy is a 'sinking lid' which should be retained as a public health measure. In addition to the sinking lid no relocations should be allowed. That means once a pokie venue closes, the pokie machines will not be moved into another community but instead will exit the system. A sinking lid is the most effective way to reduce the number of pokies over time and prevent gambling harm.

Why is this important?

- Whanganui has 14 pokie venues and in 2019 the 208 pokie machines made over \$10.7 million – at a rate of \$29,000 a day.
- Pokies are highly addictive and are the most harmful form of gambling.
- It is estimated that 30% of the money lost on pokies comes from people experiencing harm.
- A National Gambling Study (2015) found that 8.2% of the adult population used pokies in pubs once a year and 3.7% in clubs. This means that most of the community funding generated by pokies is coming from a small number of people.
- Pokie machines in Whanganui are clustered in areas of the highest deprivation, where people can least afford to lose significant amounts of money.

What needs to happen?

WDC's needs to retain its sinking lid policy with the addition of no relocations permitted. That means the Council will refuse pubs/clubs that apply to host pokies.

The WDC's consultation process is public, and your comments will be available for public inspection. Your submission won't be returned to you. If you require a copy, please make one before submitting.

Your name, phone number and email address are required for this submission and will also be made public by the Council.

What do you think? Have your say! Submissions close 20th November 2020.

For full details about the Council's proposed policy read here: <https://www.whanganui.govt.nz/Your-Council/Have-Your-Say/Consultations/Review-of-Gambling-Venues-Policy>

** NOTE: Council's consultation process is public and your comments will be available for public inspection. Your submission won't be returned to you. If you require a copy, please make one before submitting. Required fields are marked with an *

Contact name* First BAZ Last WOODLOCK
 Address 444 SH 4.
 City Whanganui State / Province / Region _____
 Postal / Zip Code _____ Country bazwoodlock@gmail.com
 Phone* 021 757223 Email* _____
 If representing an organisation: Organisation name _____
 Position/title _____

Submission

Dear Whanganui District Council,

This submission is regarding proposed changes to the Whanganui District Council's Class 4 Gambling Venue Policy.

I would like to support the current sinking lid option with no relocations and club mergers: *

- A true sinking lid on pokies that includes TAB venues with NO relocations and NO mergers.
- Please tick if you are willing to appear before the Whanganui District Council to give an oral submission.

because: without one, the problem gambling issues will not decrease.

As a current problem gambler - continued overleaf...

Hard copy submissions can be returned to the following addresses:
 1. Whanganui District Council, 101 Guyton Street, Whanganui 4500
 2. (NB. This is not a freepost)

(with PGF support.)

I know of temptation & it
needs "capping". asaf!

Whanganui District Council (WDC) is seeking feedback on its proposed gambling venues policy on the 'pokies'. The WDC's current policy is a 'sinking lid' which should be retained as a public health measure. In addition to the sinking lid no relocations should be allowed. That means once a pokie venue closes, the pokie machines will not be moved into another community but instead will exit the system. A sinking lid is the most effective way to reduce the number of pokies over time and prevent gambling harm.

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** NOTE: Council's consultation process is public and your comments will be available for public inspection. Your submission won't be returned to you. If you require a copy, please make one before submitting. Required fields are marked with an *

Contact name* First John Niko Last Maahi
 Address 42 Mitchell Street, Aramoho, Whanganui
 City Whanganui State / Province / Region _____
 Postal / Zip Code 4500 Country dotearoa
 Phone* _____ Email* inmaihia@gmail.com
 If representing an organisation: Organisation name Nga Tai o te Awa Trust
 Position/title Chairperson

Submission

Dear Whanganui District Council,

This submission is regarding proposed changes to the Whanganui District Council's Class 4 Gambling Venue Policy.

I would like to support the current sinking lid option with no relocations and club mergers: *

- A true sinking lid on pokies that includes TAB venues with NO relocations and NO mergers.
- Please tick if you are willing to appear before the Whanganui District Council to give an oral submission.

because: _____

 _____ continued overleaf....

Hard copy submissions can be returned to the following addresses:
 1. Whanganui District Council, 101 Guyton Street, Whanganui 4500
 2. (NB. This is not a freepost)

Whanganui District Council (WDC) is seeking feedback on its proposed gambling venues policy on the 'pokies'. The WDC's current policy is a 'sinking lid' which should be retained as a public health measure. In addition to the sinking lid no relocations should be allowed. That means once a pokie venue closes, the pokie machines will not be moved into another community but instead will exit the system. A sinking lid is the most effective way to reduce the number of pokies over time and prevent gambling harm.

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What needs to happen?

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What do you think? Have your say! Submissions close 20th November 2020.

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** NOTE: Council's consultation process is public and your comments will be available for public inspection. Your submission won't be returned to you. If you require a copy, please make one before submitting. Required fields are marked with an *

Contact name* First JOSEANNA Last GOODHALL
 Address 3A Virginia Road
 City WHANGANUI State / Province / Region WHANGANUI
 Postal / Zip Code 4500 Country NEW ZEALAND
 Phone* _____ Email* prjgoodhall@gmail.com
 If representing an organisation: Organisation name _____
 Position/title -

Submission

Dear Whanganui District Council,

This submission is regarding proposed changes to the Whanganui District Council's Class 4 Gambling Venue Policy.

I would like to support the current sinking lid option with no relocations and club mergers: *

A true sinking lid on pokies that includes TAB venues with NO relocations and NO mergers.

Please tick if you are willing to appear before the Whanganui District Council to give an oral submission.

because: GAMBLING IS A DISEASE

continued overleaf....

Hard copy submissions can be returned to the following addresses:

1. Whanganui District Council, 101 Guyton Street, Whanganui 4500
2. (NB. This is not a freepost)

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Contact name* First RENATA Last NIKORA
 Address 27 KARYN
 City WHANGANUI State / Province / Region _____
 Postal / Zip Code _____ Country AOTEAROA
 Phone* _____ Email* _____
 If representing an organisation: Organisation name _____
 Position/title _____

Submission

Dear Whanganui District Council,

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I would like to support the current sinking lid option with no relocations and club mergers: *

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- Please tick if you are willing to appear before the Whanganui District Council to give an oral submission.

because: MAKE POOR PEOPLE
POORER
 _____ continued overleaf....

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Contact name* First CHRIS Last MASON
Address 8 AOTEA STREET CASTLECLIFF
City WHANGANUI State / Province / Region
Postal / Zip Code Country
Phone* 0273334192 Email*
If representing an organisation: Organisation name
Position/title

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because: KAORE PAITEENEI MAHI

continued overleaf....

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Contact name* First Janet Last Tutaki
Address
City Whanganui State / Province / Region
Postal / Zip Code 0274598512 Country NZ
Phone* Email*
If representing an organisation: Organisation name Linedancing Team Position/title

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continued overleaf....

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Contact name* First Jackie Last Premidge
 Address _____
 City Whanganui State / Province / Region _____
 Postal / Zip Code _____ Country _____
 Phone* 0274-427639 Email* _____
 If representing an organisation: Organisation name Line Dancing Ropu
 Position/title _____

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Contact name* First Cavoi Last Tyson Ramaka
 Address 23 Tuhi Place Gorsefield Whanganui
 City Whanganui State / Province / Region Manawatu
 Postal / Zip Code 4500 Country Hoteroro N.Z
 Phone* 0224477185 Email* _____
 If representing an organisation: Organisation name Kaumātua Kaunihara
 Position/title Kuia Whanganui

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Contact name* First Sharon Last MCKENZIE
Address 22 D'Arcy Rd
City Whanganui State / Province / Region
Postal / Zip Code Country N.Z.
Phone* 343 7972 Email*
If representing an organisation: Organisation name
Position/title

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because: Less Pokies is good

continued overleaf...

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Contact name* First Janie Last Teika
 Address 16 Alexander St
 City Whanganui State / Province / Region _____
 Postal / Zip Code _____ Country New Zealand
 Phone* 027 737 2313 Email* _____
 If representing an organisation: Organisation name Maori Nga Tae O Te Aua
 Position/title Kuia

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because: It absorbs money from families when one becomes obsessed with it, or plays it too often.

continued overleaf...

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Contact name* First Hohepa last Peke
 Address 27 Ashton tr castlecliff
 City Whanganui State / Province / Region Manawatu
 Postal / Zip Code 4401 4501 Country New Zealand
 Phone* 0220817824 Email* tearakaunapeke@gmail.com
 If representing an organisation: Organisation name _____
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because: Its hard to live with pokier machines in our lives.

continued overleaf...

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1. Whanganui District Council, 101 Guyton Street, Whanganui 4500
2. (NB. This is not a freepost)

From: [Whanganui District Council](#)
To: niall.miller@tab.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 2:53:04 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	449111453200320
First name	Niall
Last name	Miller
Email address	niall.miller@tab.co.nz
Postal address	106-110 Jackson street Petone
Daytime phone number	027 511 3219
Organisation name	TAB New Zealand
Your role	Gaming Manager
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	30 - 39 years
Ethnicity	NZ European
Location	Other: Lower Hutt
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly disagree</p>
<p>Please provide reasons for your response</p>	<p>Please see attached</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Agree</p>
<p>Please provide reasons for your response</p>	<p>Please see attached</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Please refer to the attached</p>
<p>Supporting documents</p>	<p>Whanganui District Councils Gambling Venue Policies - Google Docs.pdf - Received</p>
<p>I would like to speak in support of my submission</p>	<p>Yes</p>
<p>Submission method</p>	<p>Online</p>

TAB New Zealand's Feedback on Whanganui District Council's Gambling Venue Policy

Introduction

1. TAB New Zealand (TAB NZ), formerly the New Zealand Racing Board, is a statutory body established through the Racing Industry Act 2020 which provides betting services to New Zealanders and makes returns back to New Zealand racing and sporting organisations.
2. When you bet with the TAB on the gallops, trots or greyhounds, take a punt on the All Blacks or European football, every betting dollar contributes to grassroots racing and sports in New Zealand as well as the livelihoods of thousands of Kiwis involved in these sectors. Each year, around \$170 million is returned to New Zealand racing and sports.

Summary

3. TAB NZ invites Council to:
 - Remove the cap on TAB Venues
 - Retain the current relocation policy
 - replace the class 4 sinking lid policy with a **CAP** at current machine number (208).

TAB Board Venues

4. A TAB Venue (formally a TAB Board Venue) is a venue owned or leased by TAB New Zealand for the primary purpose of providing racing and sport bets.
5. A Council's TAB Policy only applies to standalone TAB Board Venues. The policy does not apply to Pub TABs or Club TAB's, venues with TAB self-service terminals and remote forms of TAB betting.
6. Any new restriction or prohibition on the establishment of TAB Board Venues could simply result in an increase in the number of TAB agencies that are incorporated in bars, clubs and hotels. Any new restriction or prohibition on TAB Board Venues will also lead to an increase in betting online, with the TAB or with offshore betting providers (e.g. www.centrebet.com.au). Offshore betting providers do not contribute to New Zealand via taxes. Offshore betting providers do not contribute to the New Zealand problem gambling levy. Further, the harm minimisation procedures of offshore-based betting providers are unknown.
7. A TAB Board Venue provides an environment with staff who are extremely 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 incorporated in a bar, club or hotel, or when betting is done remotely online.

Understanding the Different Types of TAB Venues;

TAB Board Venues

8. Below are TAB Board Venues - council has jurisdiction over these types of venues:



TAB Te Rapa, Hamilton - TAB Board Venue



Albany, Auckland TAB Board Venue

Pub TABs

9. Below is 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

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



Kamo Club, Whangarei

TAB Board Venues and Harm Minimisation

11. TAB Board Venues offer one of the safest environments to partake in gambling.
12. TAB NZ takes its statutory responsibilities under the Racing Industry Act 2020 to minimise problem gambling very seriously. TAB NZ conducts its business activities with integrity and is committed to providing a safe and enjoyable environment for customers to wager responsibly.
13. All TAB Board Venues are connected via closed circuit television to a central monitoring office.
14. All TAB Board Venues have signage displayed that encourages players to gamble only at levels they can afford. This includes the TAB's Has the Fun Stopped? Take a Time-out responsible gambling campaign, which is prominently displayed in all TAB Board Venues. The signage provides advice on how to seek assistance for problem gambling
15. TAB Board Venues are subject to regular internal audits and spot checks to ensure adherence to the legislative and regulatory requirements, along with the TAB NZ's own problem gambling policy requirements.
16. No automatic teller machines are located at any TAB Board Venues.
17. TAB NZ provides problem gambling awareness training to each employee and agent.

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

18. 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 show the clean, well-lit, modern look.

Alcohol Free Environment a Positive

19. All the TAB Board Venues are alcohol-free. All the TAB facilities that are not contained within a formal TAB Board Venue are located in venues where there is alcohol available (such as pubs, clubs and hotels). 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 consumption is known to contribute to problem gambling.

20. The Baron and Dickerson study¹ found that two or more alcoholic drinks increased reports of difficulty in resisting urges to gamble. The study also found that continued 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.

21. In the commentary of the special edition of the Journal of Gambling Studies², Peter Nathan commented 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.

22. 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*³ 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.

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

¹ 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).

² Nathan, P. (2005) Commentary, Special Issue, Journal of Gambling Studies, 21(3), 355-361 (www.gamblinglaw.co.nz/download/Misc/Nathan.pdf).

³

<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 nights, bar staff can 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. Photos below demonstrate the difference between the two types of venues on a Friday night.



Sports Bar with a TAB terminal



TAB Board Venue

TAB Board Venues Have Modest Trading Hours

24. 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:

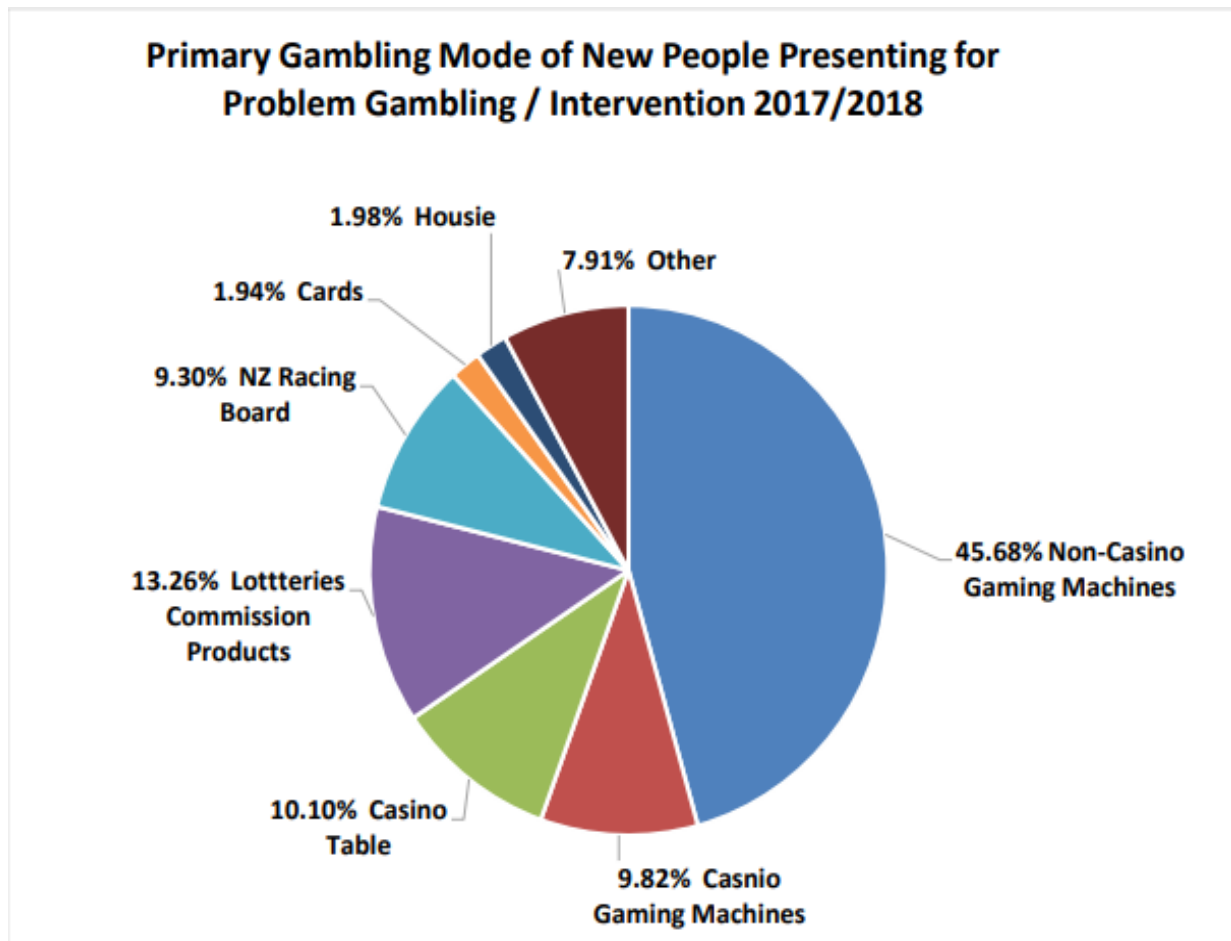
Monday:	11am - 7pm
Tuesday:	11am - 7pm
Wednesday:	11am - 8pm
Thursday:	11am - 10pm
Friday:	11am - 10pm
Saturday:	9am - 8pm
Sunday:	11am - 7pm

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

25. Wagering does not need the same restrictions as gaming machine gambling. TAB Board Venues are different from gaming machine venues with no rapid and repetitive gambling undertaken on a gaming machine. Race and sports betting does not have a high prevalence of problem gambling. Approximately **9.3%** of all new problem gamblers indicate a problem with race or sports betting. In contrast to this, approximately 55.5% of new problem gamblers report a problem with gaming machines (including casino gaming machines)⁴.

⁴

http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#to tal_assisted.



Gambling & Class 4 Gaming Machines Facts

26. The Gambling Act 2003 seeks to balance the potential harm that can occur from gambling against the benefits of using gaming machines as a mechanism for community fundraising.
27. In the 2018 calendar year, approximately \$276m of grant funding was approved across 28,000 grants to 11,000 different organisations⁵. In addition to this, over \$71m was 'applied' by the New Zealand Racing Board (TAB) (\$14m), Youthtown Foundation (\$8m) and various RSAs and Workingmen's and Chartered Clubs across New Zealand (\$50m) to support their own activities.
- Quite simply, this funding is crucial.
28. Gambling is an extremely popular form of entertainment. The New Zealand National Gambling Study: Wave 4 (2015)⁶ found that 75% of New Zealanders had participated in some form of gambling in the previous 12 months.
29. Gaming machines have been present in New Zealand communities since the early 1980s with the first gaming licence being issued on 25 March 1988, 32 years ago.

⁵ <https://www.gmanz.org.nz/resource/2018-community-distribution/>

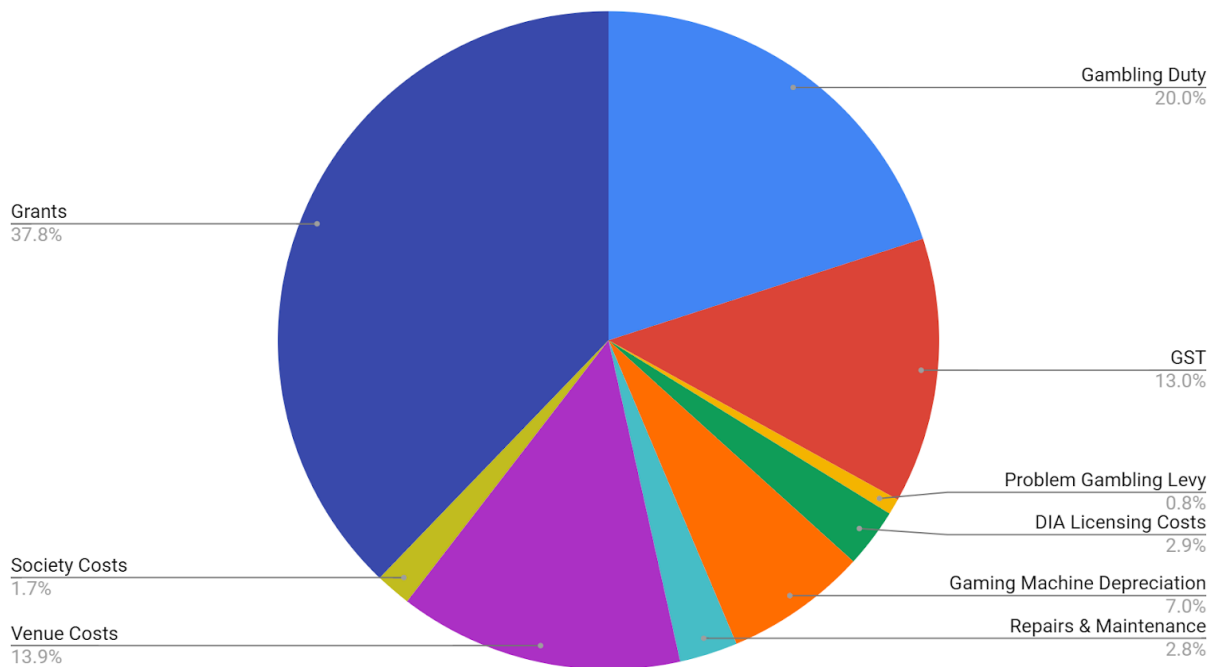
⁶ <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf>

30. Gaming machines have been in natural decline since the introduction of the Gambling Act 2003 when New Zealand had 25,221 gaming machines in operation. As of March 2020, New Zealand had 14,828 gaming machines in operation.
31. New Zealand has a very low problem gambling rate by international standards. The New Zealand National Gambling Study: Wave 4 (2015)⁷ found the problem gambling rate for **ALL** forms of gambling was 0.2% of people aged 18 years and over.
32. All Gambling providers contribute to a problem gambling fund. This fund provides approximately \$20 million 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.
33. 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 Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).
34. Class 4 Gaming societies (non clubs) are required to return a **minimum** of 40% of their gross proceeds to authorised purposes and contribute nearly 34% on Gambling Duty, GST and the Problem Gambling Levy - equalling a near 75% community benefit.
35. In the year 2018/19 financial year, class 4 gambling contributed over \$320m to the New Zealand Government by way of taxes, duty and levies.
36. Revenue breakdown;

As per the regulations - the 'return to player' on a non-casino gaming machine is required to be set between 78% and 92%, with most being set at 91.5%. On average, for every \$1.00 gambled, 91.5 cents is returned to the player as winnings. The money retained (Gaming Machine Profits) is typically allocated as follows:

⁷ <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf>

Distribution of Gaming Machine Profits - GST Inclusive



A “Capped” Class 4 Policy is Reasonable

37. Replacing the councils sinking lid policy with a capped class 4 policy is reasonable, given the current environment of high Government regulation and naturally reducing machine numbers;
38. There is **NO** direct correlation between gaming machine numbers and problem gambling rates. Over the last ten years, the problem gambling rate has remained the same, despite gaming machine numbers declining rapidly .
39. The 2012 National Gambling Survey⁸ 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.

⁸ http://www.health.govt.nz/system/files/documents/pages/national_gambling_study_report_2.pdf

40. The New Zealand National Gambling Study: Wave 3 (2014)⁹ noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

In contrast to the 1990s, there is no evidence that problem gambling prevalence decreased with decreasing participation rates during the 2000s. When methodological differences between studies are taken into account, it appears that problem gambling prevalence has remained much the same during the past 10 to 15 years.

...gambling participation has decreased substantially in New Zealand during the past 20 years, and problem gambling and related harm has probably plateaued...

41. New Zealand's leading expert on Problem Gambling, Professor Max Abbott, published a paper in 2006 titled *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 Abbott noted:

EGM reductions and the introduction of caps generally appear 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).

42. A more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, 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 online gaming.

43. Setting a cap at current gaming machine numbers is appropriate as:

- The gaming machine numbers have already declined considerably.
- The problem gambling rate, for all forms of gambling, is low (0.2% of the adult population) and likely to remain low.

⁹ <http://www.health.govt.nz/system/files/documents/pages/national-gambling-study-final-report-report-no.5.pdf>

- There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last ten years, the problem gambling rate has remained static, despite gaming machine numbers declining rapidly (4,472 gaming machines have been removed from the New Zealand market).
- The current restrictions are accelerating the migration of the gambling spend to offshore internet- and mobile-based offerings that make no community grants and pay no New Zealand taxes.

Existing Gaming Machine Safeguards

44. A capped policy is appropriate given the significant measures that are already in place to minimise the harm from gaming machines.
45. The Gambling Regulations and Game Rules contain a range of measures to aid the key intention of the Gambling Act 2003 to control the growth of gambling, and to prevent and minimise the harm caused by gambling including;
 - There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
 - Restrictions on venues suitable for hosting gaming machines, the primary activity of all gaming venues must be focused on persons over 18 years of age
 - No automated teller machines (ATMs) allowed in the gambling area of a venue
 - There are restrictive limits for Maximum stake (\$2.50) and prize limits (\$500) for gaming machines
 - A feature on every gaming machine which interrupts play at intervals of not more than 30 minutes of continuous play (the messages display information about the duration of play, amount of money spent and net wins or losses) - A message is then displayed asking the player whether they wish to continue with their session or collect their credits.
 - Restrictions on jackpot amounts (\$1,000), branding and advertising
 - Requirement to give venue staff problem gambling awareness training
 - Requirement to make information about problem gambling available to provide information about the characteristics of problem gambling and how to seek advice for problem gambling to patrons
 - Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
 - All gaming venues have a harm minimisation policy.
 - All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.
 - All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.

- Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
- It is not permissible for a player to play two gaming machines at once.
- All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
- 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).
- It is not permissible to use the word “jackpot” or any similar word in advertising that is visible from outside a venue.

Relocations

46. The current Relocation Provision in the policy is supported.
47. Venue relocation is a harm minimisation tool. Allowing venue relocation is positive and enables venues to move out of residential areas to more suitable areas, such as;
 - From a high deprivation area to a lower deprivation area.
 - From an unsuitable site such as a residential area or an area close to a sensitive site (e.g., a school or library) to a more suitable area such as a central business district.
 - To new, modern, vibrant, refurbished premises.
 - Out of earthquake-prone buildings.
 - Out of large blocks of land that could be used for more suitable purposes, such as new high-density affordable housing.
48. TAB NZ does not understand nor support the position taken by certain lobby groups in complaining that too many venues are in high deprivation areas, and then recommend councils not allow relocations (gold standard sinking lid policy). This position entrenches venues in unsuitable and unsafe locations.

Unintended Consequence – Rise in Online and Offshore Gambling

49. The Gambling Act addresses responsible gambling, focusing on;
 - The **integrity** of gambling - Lawful, fair and honest participation.
 - The **environment** gambling is conducted in is safe and secure.
 - Gambling **without pressure or devices** to encourage gambling at levels that may cause harm.
 - **Informed participation** in gambling who understand the nature of the activity and do not participate in ways that may cause harm.

50. Any reduction in the local gaming machine venue offerings will have unintended consequences - simply leading to a migration of the gambling spend to other forms of gambling, namely offshore online gambling sites, without responsible gambling attributes.
51. It's illegal to advertise offshore gambling within New Zealand. However, it is not illegal for New Zealanders to participate in offshore online gambling sites, and a simple Google search can result in easy access to all forms of online gambling - including exact replicas of the gaming machines currently available in Class 4 venues.
52. The Lotteries Commission reported in its 2018/19 Annual Report that online sales accounted for 19 percent of its total sales (\$227.6m) compared with 16 percent of its total sales (\$201.1m) in the previous year and 13 percent the year before that.
53. SkyCity launched an offshore-based online casino in August 2019 with over 1,300 online games available and within a year had over 35,000 registered customers.
54. TAB NZ online channels makes up nearly 60 percent of its total betting turnover, up 2.2 percentage points on last year.
55. TAB NZ estimates that the total online spend with offshore gambling websites by New Zealanders for the previous 12 months to August was **\$570-\$580m**. This consisting of;
 - **\$120-\$125m** on offshore wagering providers, and
 - **\$450-\$455m** on offshore online casino game providers.
56. TAB NZ estimates that total online spend with offshore casino game providers has increased 56% year-on-year and 40% on a three year compound annual growth rate.
57. TAB NZ estimates that the spend for the quarters to April 2020 and to July 2020 was \$119m and \$139m respectively, representing an increase of 67% and 133% respectively, on the same quarters for the previous year. Clearly showing an increase in offshore gambling during the initial COVID-19 Lockdown.
58. The above highlights the increase in online gambling. Offshore online gambling poses a considerable risk to New Zealand, as it:
 - Is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
 - Has no restrictions on bet sizes, provides no guaranteed return to players;
 - Has no capacity for venue staff to observe and assist people in trouble;
 - Reaches new groups of people who may be vulnerable to the medium;
 - Is more easily abused by minors;
 - Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and

- Is completely unregulated, so 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 offshore sites offer sizable cash bonuses to a customer's account for each friend that they induce to also open an account and deposit funds.
59. Offshore-based online gambling does not generate any community funding, nor does it generate any tax revenue for the Government, nor does it make any contribution to the health and treatment services as no contribution is made to the problem gambling levy.

Oral Hearing

60. TAB New Zealand would like to make a presentation at the upcoming oral hearing.

Niall Miller
TAB New Zealand

From: [Whanganui District Council](#)
To: greg@datainn.co.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 3:18:19 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	359111518201820
First name	Greg
Last name	Tichbon
Email address	greg@datainn.co.nz
Postal address	
Daytime phone number	0272495088
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Male
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No
KEY ISSUES	

<p style="text-align: center;">Current Policy</p> <p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>The ability for our community to reduce the harm caused by gaming machines by having a sinking-lid policy is the best safe-guard available at this time.</p>
<p style="text-align: center;">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>Gaming machines cause harm to people. Vulnerable people, their families, and their communities are more likely to be adversely effected. Gaming machines and the venues are set up so as to entice and keep people highly engaged. Vulnerable communities are targetted by the positioning of venues within our region This design and locations cause addiction. The software is designed so that people will inevitably lose. An email was recently sent from Lion Foundation (and others?) to organisations that have been the recipients of funding, encouraging them to make submissions supporting a cap as opposed to the existing sinking lid policy, and to encourage the recipient organisations to hilight the benefit of funding provided to organisations. The email has not,</p>

	obviously, mentioned the significant issues caused by this form of gambling, which remains hidden to many people. It seems from the Council research that in 2019 there may have been 15% to 20% returned to our community. Even if the number of gaming machines were to be reduced there is still plenty of scope for the gaming industry to actually increase their level of funding to the community.
Supporting documents	Email from Lion Foundation.txt - Received
I would like to speak in support of my submission	No
Submission method	Online

Gambling Venues Sub: 054

We know that the Council doesn't always have insight into the good that community funding generated from Class 4 "Pokies in Pubs". This where you can help. It would be greatly appreciated if you would take the time and trouble to make a submission opposing the retention of a sinking lid policy, and suggesting that the council consider adopting a policy which imposes a cap on the number of gaming machines the district. By making a submission, you will be able to provide a balanced perspective to the policy decision making. We suggest that you :

- Detail the value/benefit of the gaming funding " Photos can tell 1000 words;
- Detail how difficult it would be to obtain replacement funding. In the current Covid -19 climate funding is becoming increasingly harder to secure.
- Detail the consequences of reduced gaming funding. What services/events/facilities would your organisation no longer be able to provide
- How many people within your organisation benefit from funding.

From: [Whanganui District Council](#)
To: anashuya.richards@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 3:47:24 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	037111547202420
First name	Ana
Last name	Fletcher
Email address	anashuya.richards@gmail.com
Postal address	24 ALMA ROAD GONVILLE WHANGANUI 4501
Daytime phone number	0210362743
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	No
Gender	Female
Age group	30 - 39 years
Ethnicity	Other,Sri Lankan Tamil
Location	Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

<p align="center">KEY ISSUES</p>	
<p align="center">Current Policy</p> <p align="center">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>I support a sinking lid policy because it helps to reduce harm in our community.</p>
<p align="center">Updates to the Policy</p> <p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	<p>Strongly agree</p>
<p>Please provide reasons for your response</p>	<p>I support this to the extent that it would give greater effect to the intentions behind using a sinking lid policy.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	
<p align="center">Supporting documents</p>	<p>File(s) not provided</p>
<p>I would like to speak in support of my submission</p>	<p>No</p>
<p align="center">Submission method</p>	<p>Online</p>

From: [Whanganui District Council](#)
To: jkumeroa@teorahou.org.nz
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 4:05:01 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	006111605200120
First name	Judy
Last name	Kumeroa
Email address	jkumeroa@teorahou.org.nz
Postal address	30 Totara St Tawhero Whanganui
Daytime phone number	0274266494
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	Yes
Gender	Female
Age group	50 - 59 years
Ethnicity	NZ European, Maori
Location	Gonville (Balgownie, Tawhero, Gonville South, Gonville East, Gonville West)
Would you be interested in being involved in further consultation opportunities with Council?	Yes

KEY ISSUES	
Current Policy	
<p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly agree
Please provide reasons for your response	Having a sinking-lid policy is the best safe-guard available at this time, to reduce the harm caused by gaming machines to those in our community who are vulnerable.
Updates to the Policy	
<p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Strongly agree
Please provide reasons for your response	Close the gaps which allow activity that do not reflect the intention of the sinking lid policy
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	<p>* Gaming machines and the venues are set up so as to entice and keep people highly engaged. * Vulnerable communities are targetted by the positioning of venues within our region. * The design of gaming machines cause addiction. The software is designed so that people will inevitably lose. * I note in conversation with recipient organisations of pokies funds that they tend to either ignore the social cost or position themselves as potential victims if sinking lid has an impact on their income. These are generally good people doing generally good things in community. However they seem unable to appreciate that is our own vulnerable people pouring their</p>

	finances, their childrens food money, their rent and their souls down the slots. Recipient organisations have a vested interest in maintaining high machine useage and although they are otherwise socially responsible they appear to have a cognitive dissonance in this area. * This is another misery industry preying on the weak and yet somehow presenting themselves as caring for community.
Supporting documents	File(s) not provided
I would like to speak in support of my submission	No
Submission method	Online

From: [Whanganui District Council](#)
To: theramagesnz@gmail.com
Subject: Policy Submission Acknowledgment - Submission: Gambling Venues Policy
Date: Friday, 20 November 2020 4:17:47 PM



Submission: Gambling Venues Policy

Thank you for your submission. We appreciate you participating in the consultation process on this issue. This email is a formal acknowledgement of Whanganui District Council's receipt of your submission. Please print a copy of this page for your records.

Reference number	084111617204720
First name	Keith
Last name	Ramage
Email address	theramagesnz@gmail.com
Postal address	29 EASTOWN ROAD WHANGANUI EAST WHANGANUI 4500
Daytime phone number	0273746182
Organisation name	
Your role	
Have you submitted to the Whanganui District Council before?	
Gender	
Age group	
Ethnicity	
Location	
Would you be interested in being involved in further consultation opportunities with Council?	No

KEY ISSUES	
Current Policy	
<p style="text-align: center;">That Council retains the existing sinking lid policy for Class 4 (Pokies) venues and machines; and TABs.</p> <p>The effect of the sinking lid policy is to prevent new gambling venues from opening and more gambling machines from being introduced in Whanganui.</p>	Strongly agree
Please provide reasons for your response	<p>Class 4 gambling entices and disadvantages the vulnerable. Although possible, returns to the community rarely align with those who contribute the money when they are the least able to afford it. Without a radical bylaw that prohibits Class 4 venues and machines a sinking lid policy is the best approach we currently have in reducing the availability to gamble and thus reduce the harm.</p>
Updates to the Policy	
<p>That the drafting of the existing policy should be improved by:</p> <ul style="list-style-type: none"> • Closing existing gaps; • Updating the structure; and • Updating definitions, <p>to make it clearer and more consistent.</p>	Strongly agree
Please provide reasons for your response	<p>Make it work. From what I understand there has been very little reduction in the number of venues or machines in our city in recent years.</p>
<p>Please use this space to provide any further comments regarding this consultation. In particular, if you disagreed with any of the proposals please let us know why and provide any alternative suggestions you may have:</p>	
Supporting documents	File(s) not provided
I would like to speak in support of my	

submission	No
Submission method	Online

From: Tanya Piejus <tanya.piejus@nzct.org.nz>
Sent: Wednesday, 18 November 2020 9:54 AM
To: Will Johnston <Will.Johnston@whanganui.govt.nz>
Subject: NZCT's submission on the class 4 gambling venues policy

Hi, Will

Please find attached NZCT's submission on the class 4 gambling venues policy. We would like to speak to our submission at the public hearing.

Thanks
Tanya



Submission to
Whanganui District Council
on the proposed
Class 4 Gambling Venues Policy

November 2020

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Executive summary

- Gaming trusts returned \$294 million to the New Zealand community in 2019 in grants, while implementing the Gambling Act's stringent requirements for preventing and minimising harm from gambling.
- Community organisations in the Whanganui region received more than \$972,000 from NZCT alone in the 2019/20 financial year.
- Council gambling venue policies are critical to maintaining the infrastructure that allows community funding from gaming trusts to be sustainable long term. Sinking lid and no-relocation policies destroy this infrastructure. Councils need to take a balanced approach to community benefit and potential harm from gambling.
- There is no evidence that a sinking lid policy is the best option for Whanganui. Sinking lids are founded on the fundamental error that removing gaming machines means less harm. This is not true and not supported by the facts.
- Over the past 15 years, more than 10,000 gaming machines have been removed from New Zealand communities, but the problem gambling rate has remained static at an average of around 0.5% of the adult population over this time (currently 0.1%–0.2%, according to the most recent studies). This is among the lowest problem gambling rates in the world. Canada's, for example, is 3%.
- In the year to June 2018, only 16 Whanganui residents were assisted by problem gambling service providers.
- A sinking lid is a blunt instrument that reduces community funding by removing the fundraising infrastructure (i.e. gaming machines within entertainment venues) over time and does nothing to reduce problem gambling, which is a complex addiction.
- Research has shown that allowing gaming venues to relocate out of areas of high deprivation is more effective in reducing problem gambling.
- A cap on gaming machine numbers and an effective relocation policy that allows venues to move out of deprived areas into the CBD is much fairer to hospitality business owners, as well as helping to address problem gambling.
- If gaming venues are removed from the community, gamblers may move to the online environment where gambling is unregulated and unmonitored, has no harm minimisation measures, incentivises spending and returns nothing to the New Zealand community.

Community organisations rely on pub gaming to survive

The purpose of the pub gaming sector is to raise funds for the community. Many community sports, arts and other groups depend on pub gaming to survive. It is crucial that this fundraising system is sustainable long term.

In nominal terms, between 31 March 2004 and 31 December 2017 class 4 revenue declined from \$1,027 million to \$870 million (-15%). The decline when adjusted for inflation was \$495 million (-36%).

In the same period, community funding from non-club societies reduced from \$389 million to \$300 million – a decline of 23% in real terms. The inflation-adjusted equivalent of the \$389 million distributed by the non-club sector in Q1 2004 would be more than \$526 million today. This highlights the extent of decline in fundraising capacity.

Seventy-five percent of groups surveyed in 2012 indicated their organisation is moderately or totally reliant on gaming funding to support their core business. Fifty-five percent said there would be a high to extreme risk to their organisation and their core business if they did not receive this funding.¹ There is no evidence that this situation has changed for the better since then.

The reduction in gaming trust funding has had a negative impact on community organisations, with many organisations and activities ceasing to operate and others severely reduced in capacity and capability. Grassroots community organisations are struggling with few alternative sources for funding available to replace the loss of gaming funding. Voluntary organisations are increasingly reliant on nationwide public donation campaigns to stay afloat. Covid-19 has only worsened this situation.

Every year, the gaming trust sector raises around \$294 million² for more than 9,700 worthwhile sports and community groups. The sector's contribution to the community through funding, in addition to the contribution to government revenue from GST, other taxes and levies, is acknowledged by central government.

We anticipate that the Government will regulate to require gaming societies to return at least 80% of the net proceeds they generate to the region where the funds were raised. This means communities that do not operate gaming machines will be unlikely to receive gaming grants and their local sports and community groups will suffer. NZCT already aims to return 92% of our funds locally.

The pub gaming sector has experienced a significant decline

During the last 17 years the pub gaming sector has experienced a significant decline. Department of Internal Affairs (DIA) statistics show that, between 30 June 2003 and 30 June 2020:

- the number of gaming venues reduced from 2,122 to 1,074 (a 49% reduction)³
- the number of gaming machines operating reduced from 25,221 to 14,847 (a 41% reduction)⁴.

Council policies contribute to the decline in the pub gaming sector

One of the main contributors to the decline of the pub gaming sector is the inflexibility of council gambling policies, particularly those with sinking lids on gaming machine numbers and those that do not allow relocation of venues in a broad range of circumstances.

¹ Page iii, Community Funding Survey, Point Research 2012.

² *Grant Distribution Modelling*, KPMG, November 2020.

³ DIA statistics: https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict

⁴ Ibid.

Such policies are based on the erroneous belief that limiting gaming machine numbers will limit problem gambling. In fact, despite the 41% reduction in gaming machine numbers during the past 17 years, New Zealand's problem gambling rate has remained consistently low at around 0.3% to 0.7% of the population. The 2015 New Zealand Gambling Study (the most recent) found the rate was 0.2% and the latest Health and Lifestyles Survey found it was 0.1%. The 2012 New Zealand Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006."⁵

Regulatory changes in 2014 increasing the minimum percentage of gaming machine profits to be returned to the community to 40% from 37.12% has put additional pressure on many gaming societies. This is forcing them to shed venues not contributing enough, given other cost pressures.

Online gambling is an unregulated threat

The public has access to a growing number of overseas gambling websites where they can spend their entertainment dollar. These sites are highly accessible, even to minors, often offer inducements to keep players betting, and have no bet size restrictions or guaranteed return to players. They do not return any funds to the New Zealand community or the New Zealand Government, and have no harm minimisation measures in place.

During the Covid-19 lockdown, 8% of gamblers gambled online for the first time and an additional 12% gambled online more than usual.⁶

Location of gaming machines is more important than their number

Research⁷ suggests that when it comes to preventing and minimising gambling harm, the location of gaming machines is more important than the number of gaming machines operating. The Government acknowledged this point in 2013 when it amended the Gambling Act⁸ to require local authorities to consider adding relocation clauses to their gambling policies.

As well as harm minimisation benefits from allowing venues to relocate out of areas of high deprivation, relocation clauses provide sensible options for business owners who are otherwise at the mercy of building owners who know they have captive tenants. Relocation clauses also give councils more flexibility for re-zoning and city planning.

NZCT's recommendations

New Zealand Community Trust recommends Whanganui District Council:

- replace the sinking lid with a cap at current numbers (14 venues and 208 machines)
- expand the current relocation provision to allow venues to relocate for their own reasons as well as if forced to by extraordinary circumstances.

⁵ Page 7, *New Zealand 2012 Gambling Study: Gambling harm and problem gambling*.

⁶ Impact on Covid-19: Topline results, April 17 2020, Health Promotion Agency

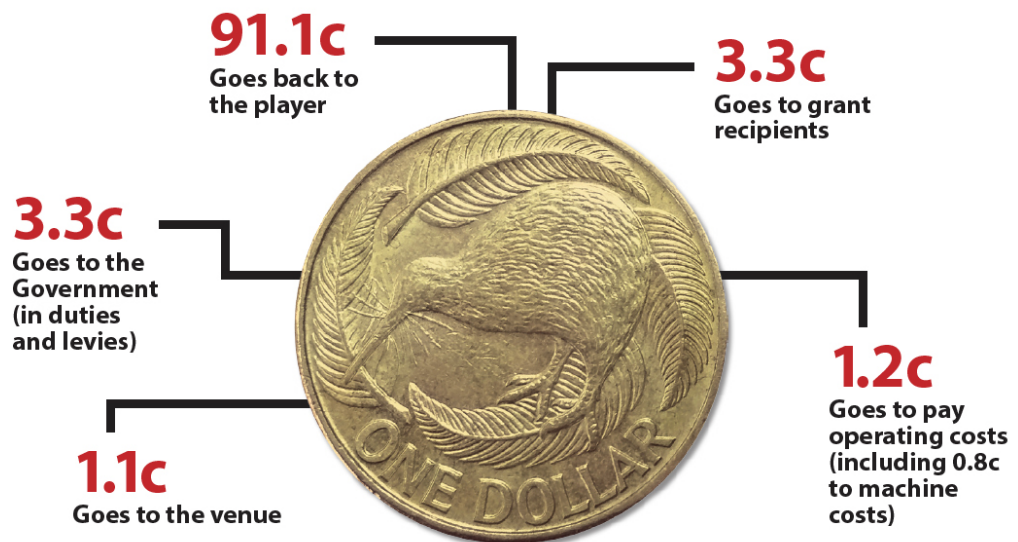
⁷ *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*, Gambling & Addictions Research Centre, AUT University, 2012.

⁸ Section 97A and 102(5A).

Pub gaming's vital support for the community

In most countries, gambling is purely for commercial gain. New Zealand is different. We are one of the few countries with a community-focused model for pub gaming, where the proceeds are returned to the community instead of the private sector.

For every dollar a player wagers at an NZCT gaming room, on average:



Research⁹ shows that the annual entertainment value from the pub gaming sector to recreational players is around \$250 million. The government revenue in the form of tax, duties and levies is also substantial and was over \$279 million in 2014.

Grants distributed by gaming machine trusts were 10% of the total philanthropic funding to the community and voluntary sector in 2011 and were at almost twice the level given by New Zealand businesses. In 2019, the amount of funds returned to the community from non-casino, non-club gaming grants was \$294 million.¹⁰ Class 4 gaming societies are required to distribute a minimum return of 40% to the community, on top of government fees, levies and GST, site rental, and machine and operating costs (see the chart on the next page showing NZCT's revenue distribution for the 2018/19 reporting period).

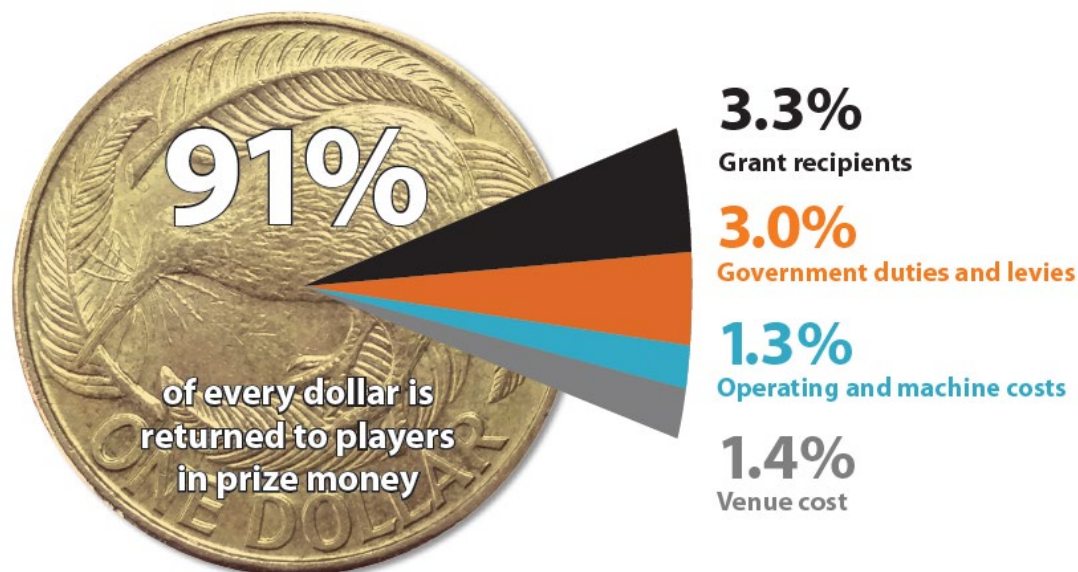
Each year the gambling industry pays around \$20 million to the government, so the Ministry of Health can implement its Preventing and Minimising Gambling Harm Strategic Plan. These funds pay for the implementation of public health services, intervention services, research, evaluation and workforce development.

Pub gaming is tightly regulated and no more than 16% of gaming proceeds can be paid to gaming venue operators to cover site rental, including staff costs and business overheads relating to the gambling operation.

⁹ *Maximising the benefits to communities from New Zealand's community gaming model*, BERL, February 2013.

¹⁰ *Grant Distribution Modelling*, KPMG, November 2020.

NZCT's revenue distribution in 2018/19



In the year ending 30 September 2019, NZCT distributed \$44.99 million to 1,992 sports and community groups through 2,294 grants.

Amateur sport is our main focus, so around 75% of the grants we distribute go to sports organisations. Each year, NZCT funds around 50 different sports.

In 2018/19, we funded the equivalent of:

- uniforms for 49,998 rugby teams (one uniform costs \$60), or
- 2,999,867 footballs (one football costs \$15), or
- 5,625 four-person waka (one waka costs \$8,000), or
- more than 2.25 million hours – or 256.8 years – of coaching (one hour of coaching costs \$20), or
- 30 artificial playing fields (one field costs \$1.5 million).

To raise this much money themselves, our grant recipients would have had to:

- cook and sell more than 22.4 million \$2 sausages at sausage sizzles and every person in New Zealand would need to buy and eat five sausages, or
- sell five \$2 raffle tickets to every man, woman and child in New Zealand each year, or
- wash more than 8.9 million cars at \$5 a wash, which would take 10 people continuously washing cars for 30 minutes around 50 years to achieve.

Sport New Zealand's report *The Value of Sport* states:

“Survey results indicate that the great majority of the general public agree that physical activity through sport, exercise and recreation is valuable. Whether individuals are ‘active’ or not, whether they are ‘sporty’ or not, whether they even like sport or not, most New Zealanders see value in sport and active recreation.

“Evidence from a wide range of international and national sources support many of New Zealanders’ perceptions, confirming that sport adds value to the lives of individuals, communities and the nation.

“Put simply, sport and active recreation creates happier, healthier people, better connected communities and a stronger New Zealand.”

NZCT's position

In the following pages, we provide five reasons why we advocate for gaming venues to be allowed to relocate to new premises in a broad range of circumstances. We also provide seven reasons why we oppose a sinking lid.

Why allowing relocations is important

Helping reduce harm

Research¹¹ 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".¹² The Ministry of Health also found "being a problem gambler is significantly associated with living closer to gambling venues."¹³ Allowing gaming operations to move out of high-deprivation areas could potentially diminish gambling harm for at-risk communities.

Supporting local hospitality businesses

Relocation clauses 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 business to more suitable premises. This is particularly important if premises are deemed unsafe or unusable for a lengthy period, such as after a fire or earthquake. The result is attractive and safe entertainment environments in your community.

Responding to future demand

Broad relocation clauses help gambling venue policies 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.

The DIA recommended relocation policies as a way of allowing territorial authorities to future-proof their class 4 gambling policies.¹⁴

Allowing appropriate benefit and responsibility

Gaming machine entitlements sit 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 no responsibility for the gambling operation, unless they are also the operator of the site.

A broad relocation clause distributes the benefit and responsibility more fairly, enabling the gambling operator to choose where they wish to establish their business. A building owner could hike rents and ignore building maintenance because they know they have a captive tenant. In contrast, having a broad relocation clause incentivises building owners to maintain and upgrade their premises to attract and retain high-quality tenants.

¹¹ *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*, Gambling & Addictions Research Centre, AUT University, 2012.

¹² Page 21, *Ministry of Health Gambling Resource for Local Government*, 2013.

¹³ *Ibid.*

¹⁴ *Internal Affairs Policy Briefing 3: Options for improving territorial authority gaming machine policies*, 28 March 2013.

Parliament's directive is being acknowledged by other councils

Of the many local authorities (see the table below) that have completed a gambling venue policy review since 2015, only six have not allowed relocations in their policy after considering a new or amended clause.

This reflects legislative change in September 2013, which required councils beginning a review of their gambling policy for the first time following the Gambling Act amendment to consider introducing a relocation clause (section 102(5A)).

Council	Submissions made	Review result
Thames-Coromandel	March 2015	Added relocation option
Wellington City	May 2015	Added relocation option
Westland	May 2015	Added relocation option
Hutt City	June 2015	Added relocation clause
Kaipara	June 2015	Added relocation option
Invercargill City	July 2015	Added relocation option
Waipa	August 2015	Added relocation option
Waitaki	September 2015	Added relocation option
Gisborne	November 2015	Added relocation option
Whakatane	April 2016	Added relocation clause
Matamata-Piako	April 2016	Added relocation clause
Southland	July 2016	Added relocation option
South Taranaki	August 2016	Added relocation option
Palmerston North	October 2016	Existing relocation option remains unchanged
Tasman	No public consultation	No relocations allowed
Otorohanga	March 2017	No relocations allowed
Hastings	March 2017	Existing relocation clause amended
Auckland	No public consultation	No relocations allowed
Napier	May 2017	Existing relocation clause amended
Rotorua	May 2017	Existing relocation clause amended
Queenstown	June 2017	Re-consulting on relocation clause in November 2017
Wairoa	June 2017	Existing relocation clause remains unchanged
Waitomo	No public consultation	Existing relocation clause remains unchanged
Hauraki	October 2017	No relocations allowed
New Plymouth	October 2017	Added relocation option
Horowhenua	October 2017	Existing broad relocation clause remains unchanged
Manawatu	September 2017	Existing broad relocation clause remains unchanged
Central Hawke's Bay	November 2017	Added relocation option
Dunedin	December 2017	Added relocation option
Thames-Coromandel	No public consultation	Existing relocation clause remains unchanged
Kawerau	December 2017	No relocations allowed
Taupo	October 2017	Existing relocation clause remains unchanged
Whanganui	October 2017	Added relocation option
Stratford	March 2018	Broad relocation policy introduced
Hamilton	February 2018	Proposal to remove relocation policy rejected
Marlborough	December 2017	Broader relocation policy introduced
South Waikato	March 2018	Existing relocation clause remains unchanged
Christchurch	No public consultation	No relocations allowed
Tauranga	November 2018	Broader relocation policy introduced
Nelson	October 2018	Existing relocation clause remains unchanged

Waitaki	September 2018	Relocation clause broadened
Waikato	August 2018	Existing relocation clause remains unchanged
Selwyn	June 2018	Existing relocation clause remains unchanged
Grey	June 2018	Relocation clause broadened
Kapiti	November 2018	Relocation clause clarified
Kaipara	November 2018	Existing relocation clause remains unchanged
Masterton/South Wairarapa/Carterton	May 2019	Existing relocation clause remains unchanged
Tararua	May 2019	Existing relocation clause remains unchanged
Matamata-Piako	April 2019	Existing relocation clause remains unchanged
Gisborne	March 2019	Existing relocation clause remains unchanged
Southland	June 2019	Existing relocation clause remains unchanged
Whangarei	May 2019	Existing relocation clause remains unchanged
Waipa	May 2019	Existing relocation clause remains unchanged
Porirua	July 2019	Existing relocation clause remains unchanged
Whakatane	April 2019	Existing relocation clause remains unchanged
Hamilton	June 2019	Existing relocation clause remains unchanged
South Taranaki	June 2019	Existing relocation clause remains unchanged
Tasman	August 2019	No relocations allowed
Invercargill	July 2019	Relocation clause improved
Rangitikei	October 2019	Existing relocation clause remains unchanged
Timaru	October 2019	Relocation clause added
Central Otago	February 2020	Existing relocation clause remains unchanged
Upper Hutt	July 2020	Existing relocation clause remains unchanged

Reasons to maintain the current policy on gaming machines and venues

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

Local hospitality sector

Businesses that host gaming machines are typically pubs and hotels. Gaming machine venues contribute to your local economy by employing staff and providing hospitality options for residents and tourists.

Community funding

Around \$294 million is returned to the community every year through grants awarded by Class 4 gaming societies. Many community organisations, such as sports clubs, hospices, rescue services and arts groups, would struggle or cease to function without this funding. There is currently no sustainable alternative to this funding to the level provided by gaming societies.

In the year to 30 September 2020, NZCT distributed \$972,313 through 73 grants that had a direct benefit to Whanganui residents (see appendix 2 for details). Most of this was for sporting purposes, as per our trust deed. However, we also funded salaries at Community House Whanganui Association and Presbyterian Support Central, decodable books for Kai Iwi School, a harpsichord for the NZ Opera Training School Trust, pipe chanters for the Pipe Band Society 5WWCT, tools for Wanganui Enterprises Trust, and equipment for Wanganui Toy Library.

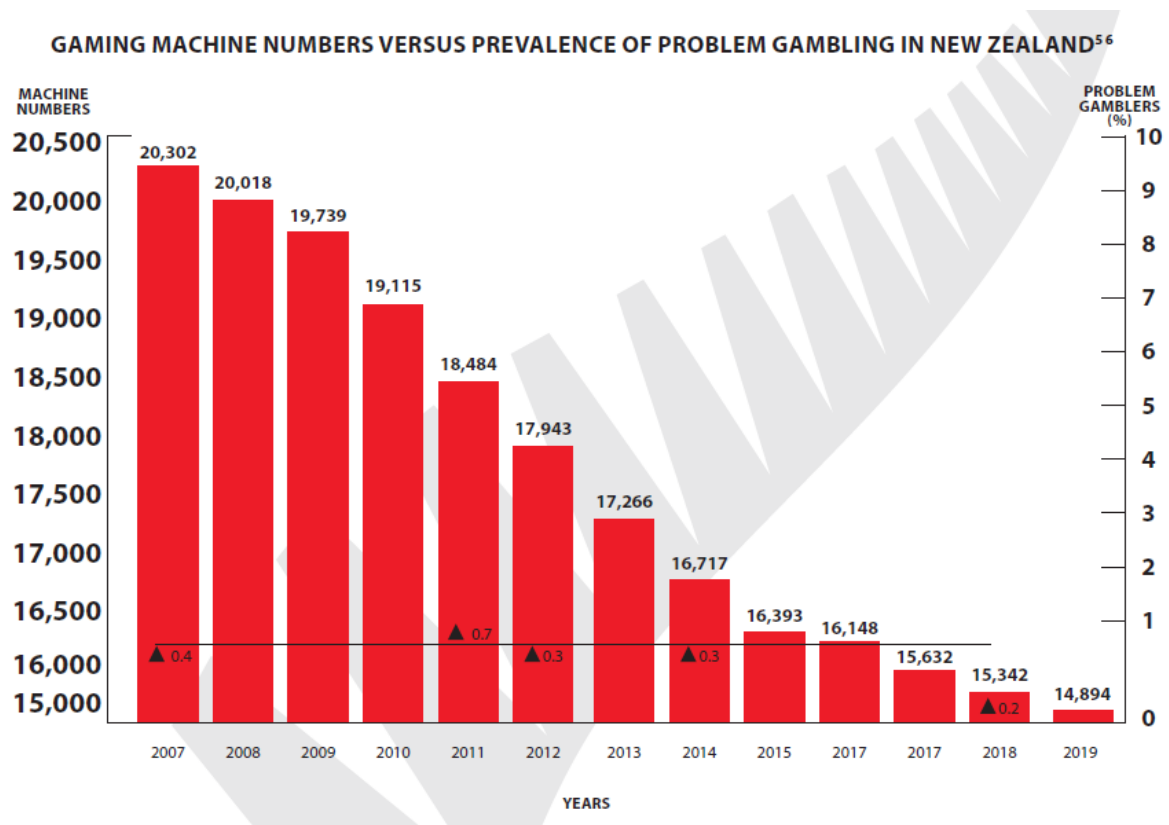
Class 4 gaming societies have probity processes we go through with every grant application to ensure the applicant is authentic and able to deliver the outcomes detailed in their grant application, and that any goods or services to be paid for by the grant are at arm's length and free from any conflicts of interest.

Difference between pub gaming societies, and clubs and New Zealand Racing Board

The pub gaming model differs from the gaming run at clubs like RSAs and in New Zealand Racing Board (now known as RITA) venues. Those entities can apply the funds they raise to their own purposes, for example, maintaining clubrooms or funding race meetings. In its 2019 annual report, RITA advised its distributions totalled \$166.5 million to the racing industry and only \$4.1 million to community sports organisations. In contrast, class 4 societies like NZCT distribute all net proceeds to the community.

Gaming machine numbers have little effect on problem gambling numbers

It is misleading and wrong 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 more than 5,000 gaming machines across the country between 2007 and 2019 had no impact on the small percentage of problem gamblers nationally.



Note: 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 New Zealand Gambling Study found the rate was 0.7% of people aged 18 years and over. The 2015 wave of the New Zealand Gambling Study found the rate was 0.2% and the 2016 Health and Lifestyles Survey found it was 0.1%.

Gaming machines are a legal and valid entertainment choice

Pub gaming is a legal, valid and enjoyable source of entertainment for Whanganui 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 “... conditions can only properly 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.”¹⁵

We recognise that Whanganui District 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 vital part of achieving this outcome.

Pub gaming brings many benefits to New Zealand. Business and Economic Research Ltd (BERL)¹⁶ calculated in 2015 that each year the entertainment value to recreational players was around \$250 million, the grants value to the community was also around \$250 million (now \$294 million), and the Government revenue value in the form of tax, duties and levies was around \$279 million.

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, decreased from 18% in 1991 to 6% in 2012.¹⁷ The study concluded: “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.”¹⁸

The 2016 National Gambling Study (the most recent) found the problem gambling rate was 0.2% and concluded: “From 2012 to 2015, overall gambling participation has declined whilst problem gambling and low-risk and moderate-risk gambling levels have remained static. This poses a public health challenge of identifying the factors to explain the persistence of harm despite declining gambling participation. One reason may be a high relapse rate [66%].”

The 2016 Health and Lifestyles Survey states that “In 2016, 3.1% of New Zealand adults 18 years and over had experienced an occasion when they had gambled more than intended, but this proportion has been dropping steadily since 2006/07 when it was 11%.”

It also states that the current problem gambling rate has now dropped to an all-time low of 0.1% of the adult population (around 7,500 people), despite an upward trend in gaming machine expenditure.¹⁹

Problem gambling rates in New Zealand are relatively low

NZCT is committed to reducing and minimising the harm that can be caused by gambling. As can be seen in the table on the next page, New Zealand has one of the lowest rates of problem gambling in the world.²⁰ Relatively few New Zealanders are gambling at levels that lead to negative consequences; most people who gamble know when to stop.

¹⁵ Gambling Commission decision GC 03/07.

¹⁶ *Maximising the benefits to communities from New Zealand's Community Gaming Model*, BERL, February 2013.

¹⁷ Pg 8, *NZ 2012 National Gambling Study: Overview and gambling participation*.

¹⁸ Pg 18, *ibid*.

¹⁹ DIA media release: <http://livenews.co.nz/2017/04/21/new-zealand-gaming-pokie-spending-patterns-continue/>

²⁰ *Maximising the benefits to communities from New Zealand's community gaming model*, BERL, February 2013.

Country	Problem gambling prevalence (% population*)
New Zealand	0.1–0.2
UK	0.7
Norway	0.7
Australia	2.3
USA	2.6
Canada	3
*Mixture of CPGI, PGSI and SOGS scores ²¹	

Gaming machines can only be played in strictly controlled environments

Corporate societies licensed to conduct class 4 gambling are fully aware of their obligations under the Gambling Act 2003. All gaming rooms are operated by trained staff at licensed venues.

The DIA is responsible for monitoring the class 4 gambling industry, including venue ‘key persons’, bar staff and societies, to ensure they adhere to legislative requirements. The penalties for non-compliance include fines, suspensions, loss of operating or venue 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 are 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, such as pubs, nightclubs and 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 and 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
- venue staff must help problem gamblers if they have an ongoing concern about them.

²¹ 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.

Harm minimisation activities

Gaming trusts take legal obligations very seriously, none more so than those around minimising the harm that 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
- a plain language harm prevention and minimisation manual and policy guide
- exclusion orders and guidance on the exclusion order process
- a pad of gambling host responsibility record sheets to record any problem gambling issues and action taken by staff
- signage, pamphlets and other problem gambling resources.

NZCT also provides all its gaming venues with the Health Promotion Agency's harm minimisation signs to display in and around the gaming area, wallet cards with information for potential problem gamblers and host responsibility resources for staff.

Ongoing obligations

The Gambling Act obliges venue staff to provide ongoing help to a potential or current problem gambler. Offering help once, and then ignoring continued warning signs, is not sufficient.



A venue is automatically in breach of the law if an excluded person enters the gambling area. Venues must be able to show they have robust systems and processes in place that restrict excluded people from entering.

Training

NZCT provides face-to-face and online problem gambling training to staff at each of its gaming venues and trains over 500 staff a year.

Trainers deliver a presentation on problem gambling and take staff members through each part of the problem gambling resource kit in detail. Venue staff also work through an online training tool, which includes an assessment that they must pass. Refresher training is provided annually. Gaming venues are continually reminded of their obligation to ensure a person trained in harm minimisation is always on duty when gaming machines are operating.



Support is available for problem gamblers

Each year the gambling industry pays \$20 million 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.

Two of the findings from the inaugural PMGH baseline report were that problem gambling services are effectively raising awareness about the harm from gambling, and interventions for gambling-related harm are moderately accessible, highly responsive and moderate to highly effective.²²

The world's largest clinical trial²³ for problem gambling treatment found that, one year after calling the Gambling Helpline, three-quarters of callers had quit or significantly reduced their gambling.

²² Page 16, *Outcomes Framework for Preventing and Minimising Gambling Harm Baseline Report*, May 2013.

²³ *The Effectiveness of Problem Gambling Brief Telephone Interventions*, AUT, Gambling & Addictions Research Centre.

Further information about our submission

For further information, or if you have any questions about NZCT's submission, contact Tanya Piejus, Communications Manager on (04) 495 1594 or tanya.piejus@nzct.org.nz.

Appendix 1: About NZCT

Established in 1998, NZCT is New Zealand’s largest gaming trust with 16% market share. Our publicans raise funds by operating gaming lounges within their pubs, hotels and other venues. In the 12 months to 30 September 2019, NZCT approved \$44.99 million in grant funding 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 75% of the funds we distribute are directed towards sports activities, making NZCT the largest funder of amateur sports participation 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 cohesion.²⁴



Overseas research²⁵ 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.

Who we are

We are proud of our robust grants system and of the quality of people involved with NZCT. All our trustees²⁶ are highly regarded business and community leaders with extensive governance experience. They are supported by an experienced staff and 10 Regional Advisory Committees (RACs) who add local knowledge and insight to our grant decisions.

²⁴ Sport England’s Value of Sport Monitor.

²⁵ http://www.ausport.gov.au/information/asc_research/publications/value_of_sport.

²⁶ 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).

Appendix 2: Grants to Whanganui District - October 2019 to September 2020

Grant #	Organisation	Total Amount Approved	Amount drawn from Whanganui District	Date of Approval Purpose
81183	Aramoho Whanganui Rowing Club Inc	\$15,599.60	\$15,599.60	17/12/2019 Towards coxed four/quadruple sculls
81197	Athletics Wanganui Inc	\$3,000.00	\$3,000.00	22/01/2020 Travel (excludes driver's accommodation)
83542	Community House Whanganui Association Inc	\$5,000.00	\$5,000.00	31/08/2020 Salary
82534	Gonville-Castlecliff Bowling Club Inc	\$5,000.00	\$5,000.00	29/06/2020 Salary
79655	Kai Iwi School	\$1,995.00	\$1,995.00	29/11/2019 Towards decodable books
79967	NZ Opera Training School Trust	\$9,251.14	\$9,251.14	29/11/2019 Towards purchase and assembler of Harpsichord
79982	Pipe Band Society 5WWCT Inc	\$4,710.00	\$4,710.00	22/10/2019 Towards bagpipe chanters
80284	Presbyterian Support Central	\$5,000.00	\$5,000.00	18/02/2020 Salary
80129	Ratana Paa Kaihoe Trust	\$9,625.50	\$9,625.50	29/11/2019 Towards shipping container
80514	Rivercity Boxing Club Inc	\$12,000.00	\$12,000.00	18/02/2020 Salary
80133	Tamaūpoko Community Led Trust	\$48,000.00	\$48,000.00	22/10/2019 Towards purchase of a van/minibus
82725	Tennis Wanganui Inc	\$25,000.00	\$25,000.00	29/06/2020 Contract fee - Development Officer
80490	Wanganui Area Neighbourhood Support Groups Inc	\$335.92	\$335.92	17/12/2019 Towards rugby balls
81214	Wanganui Braves Softball and Sports Club Inc	\$2,429.59	\$2,429.59	22/01/2020 Equipment
82702	Wanganui City Football Club Inc	\$2,065.22	\$2,065.22	29/06/2020 Hire of changing sheds and training lights; Travel costs
83813	Wanganui City Football Club Inc	\$2,046.29	\$2,046.29	22/09/2020 Equipment and training bibs
81259	Wanganui Collegiate School	\$6,000.00	\$6,000.00	22/01/2020 Travel and accommodation
80402	Wanganui Darts League Inc	\$6,363.40	\$6,363.40	29/11/2019 Towards wall repairs and door replacement
83838	Wanganui East Bowling Club Inc	\$7,158.47	\$7,158.47	22/09/2020 Sunshade cover
79721	Wanganui Enterprises Trust	\$2,035.25	\$2,035.25	22/10/2019 Towards air compressor - Industrial Belt Drive
83368	Wanganui Enterprises Trust	\$8,725.00	\$8,725.00	31/08/2020 Docking saw
80628	Wanganui Golf Club Inc	\$25,000.00	\$25,000.00	17/12/2019 Towards purchase of greens mower
83093	Wanganui Lightning United Inline Hockey Club Inc	\$2,520.00	\$2,520.00	31/08/2020 Accommodation
81161	Wanganui Marist Rugby Football Club Inc	\$21,931.14	\$21,931.14	18/02/2020 Medical supplies - tape; Van hire for travel in 2020 season; Rugby playing uniforms; Netball playing uniforms
82015	Wanganui Motor Cycle Club Inc	\$50,700.00	\$50,700.00	6/08/2020 Airfence barriers; Contract fee - Administrator
80282	Wanganui Pirates Rugby Football Club Inc	\$10,000.00	\$10,000.00	22/10/2019 Towards playing uniforms
81541	Wanganui Rugby Football Union Inc	\$80,000.00	\$80,000.00	22/01/2020 Women's & Secondary School Development Officer; Rugby Development Officer; Game Development Manager
83827	Wanganui Rugby Football Union Inc	\$43,424.20	\$43,424.20	22/09/2020 Salary - Women's & Secondary School Development Officer; Salary - Chief Executive Officer; Salary - Finance Officer/PA; Salary - Rugby Development Officer
83064	Wanganui Sailing Club Inc	\$23,000.00	\$23,000.00	31/08/2020 Yachts and trolleys
80562	Wanganui Sports Foundation	\$50,000.00	\$50,000.00	22/10/2019 Towards contract fee for Manager
81389	Wanganui Swimming Club Inc	\$32,000.00	\$32,000.00	29/06/2020 Lane hire; Salary - Head Coach
80674	Wanganui Tech Cricket Club Inc	\$1,000.00	\$1,000.00	29/11/2019 Towards ground hire (excludes affiliation and levy fees) from 29/11/2019
80552	Wanganui Toy Library Incorporated	\$1,413.70	\$1,413.70	18/02/2020 Towards equipment
83578	Whanganui Creative Space	\$2,400.00	\$2,400.00	22/09/2020 Salary
83748	Whanganui Intermediate School	\$20,000.00	\$20,000.00	22/09/2020 Confidence course/Playground
83216	Whanganui NZ Masters Games Trust	\$80,000.00	\$80,000.00	22/09/2020 Salary - Marketing & Events Coordinator - excludes allowances; Salary - Sports Partner Liaison - excludes allowances; Salary - Games Manager - excludes allowances
81554	Whanganui Squash Rackets Club Inc	\$30,432.00	\$30,432.00	6/08/2020 Club upgrade
81999	Whanganui Volunteer Centre Trust	\$10,000.00	\$10,000.00	6/08/2020 Salary

Grant #	Organisation	Total Amount Approved	Amount drawn from Whanganui District	Date of Approval Purpose
80932	Womens Network Wanganui Inc	\$5,000.00	\$5,000.00	22/01/2020 Salary
80204	Young Mens Christian Association Central Inc	\$12,584.85	\$12,584.85	22/10/2019 Towards purchase and installation of Bratt Pan
80246	Youth Services Trust Whanganui	\$5,000.00	\$5,000.00	22/01/2020 Salary
		\$687,746.27	\$687,746.27	
Grants to regional and multi-regional organisations that benefit Whanganui District				
80786	Bike Manawatu Inc	\$10,000.00	\$4,500.00	22/01/2020 Salary
82011	Brain Injury Association Central Districts Inc	\$3,600.00	\$1,692.00	6/08/2020 Salary
82626	Cancer Society of NZ Central Districts Division Inc	\$20,000.00	\$2,350.00	6/08/2020 Salary - Volunteer Coordinator - Gisborne; Salary - Volunteer Coordinator - Hawkes Bay; Salary - Volunteer Coordinator - Manawatu; Salary - Volunteer Coordinator - Taranaki
81143	Central Districts Cricket Association Inc	\$135,607.60	\$4,897.56	17/12/2019 Towards salary for Head Coach - Central Hinds; Towards District Development programmes (excluding Wanganui Cricket); Towards fee for Emerging Talent and Womens Strength and Conditioning Coach; Towards equalised tournament costs
80752	Central Zone Deaf Rugby Union Inc	\$4,319.97	\$349.92	17/12/2019 Towards travel and accommodation (excludes food)
83563	Hockey Manawatu Inc	\$46,659.00	\$17,730.42	31/08/2020 Salary - Office Manager; Salary - General Manager
83184	Manawatu Badminton Association Inc	\$31,000.00	\$11,780.00	22/09/2020 Salary - Shuttletime Coaching Coordinator - excludes allowances; Salary - General Manager - excludes allowances; Salary - Executive Manager - excludes allowances
80471	Manawatu Cricket Association Inc	\$95,000.00	\$43,700.00	29/11/2019 Towards salary of Director of Cricket; Towards Connected Clubs Initiative; Towards salary of General Manager - Community Cricket; Towards salary of Women's Community Cricket Coordinator
83160	Manawatu Rugby Union Inc	\$75,000.00	\$35,250.00	6/08/2020 Salary - Chief Executive Officer; Salary - Coach Development Manager; Salary - Operations Manager
80587	Manawatu Scottish Society of NZ Inc	\$30,000.00	\$13,800.00	29/11/2019 Towards building upgrade (excludes design fees)
81653	Manawatu Softball Association Inc	\$20,000.00	\$9,200.00	22/01/2020 Accommodation - Excludes catering
81081	Manawatu Wanganui Golf Inc	\$40,000.00	\$18,000.00	17/12/2019 Salary
80926	Netball Central Zone Inc	\$248,200.00	\$18,354.00	18/02/2020 Salary - Umpire and Bench Lead; Salary - Coach Relations - Wellington (excluding kiwisaver); Salary - Junior and Youth Lead; Salary - Community Netball Manager (excluding fundraising element); Salary - Coach Relations - Manawatu (excluding kiwisaver); Salary - Community Emerging Talent Manager (excluding kiwisaver and fundraising element); Salary - CEO (excluding kiwisaver and fundraising element)
83117	Netball Central Zone Inc	\$108,000.00	\$9,397.65	6/08/2020 Salary - Admin and Finance Officer; Salary - Junior Development and Youth Lead; Salary - Chief Executive Officer; Salary - Community Emerging Talent Manager; Salary - Coach Relations - Wellington; Salary - Umpire and Bench Lead
79608	No 4 District Federation of NZ Football T/A Central Football Inc	\$160,000.00	\$25,000.00	22/10/2019 Towards salary of Football Development Officer - Poverty Bay; Towards salary of Community Development Manager/Community Development Officer - Hawke's Bay; Towards salary of Community Development Officer - Taranaki; Towards salary of Football Development Officer - Whanganui; Towards salary of Women's Football/Futsal Development Officer - Hawke's Bay; Towards salary of Football Development Officer - Manawatu
83936	No 4 District Federation of NZ Football T/A Central Football Inc	\$160,000.00	\$19,000.00	22/09/2020 Salary - Community Development Officer - Taranaki - excludes allowances; Salary - Community Development Officer - Whanganui - excludes allowances; Salary - Community Development Officer - Manawatu - excludes allowances; Salary - Community Development Officer - Poverty Bay - excludes allowances; Salary - Community Development Officer - Hawkes Bay - excludes allowances; Salary - Community Development Manager/Community Development Officer - Hawkes Bay - excludes allowances
80747	No 5 District Federation of NZ Football Inc - Capital Football Inc	\$111,080.00	\$2,171.61	29/11/2019 Towards travel (excludes service fee)
83085	Special Olympics Lower North Island Regional Council	\$12,610.00	\$1,112.40	6/08/2020 Van hire and accommodation; Mountain passes
81287	Swimming Manawatu Inc	\$6,032.61	\$2,775.00	22/01/2020 Pool hire
83155	Swimming Manawatu Inc	\$3,862.20	\$1,815.24	6/08/2020 Pool hire
80671	Tennis Central Region Inc	\$87,000.00	\$12,234.38	29/11/2019 Towards salary of Participation Manager; Towards salary of Senior Events Coordinator; Towards salary of Events & Operations Manager

Grant #	Organisation	Total Amount Approved	Amount drawn from Whanganui District	Date of Approval	Purpose
83746	Wellington Softball Association Inc	\$50,000.00	\$3,040.00	22/09/2020	Salary
		\$1,457,971.38	\$258,150.18		
Grants to national organisations that benefit Whanganui District					
83098	Basketball NZ Inc	\$65,555.40	\$3,081.10	6/08/2020	Contract fee - Capital Zone; Contract fee - Regional Coordinator - Southland; Contract fee - Regional Coordinator - Otago; Contract fee - Regional Coordinator - Canterbury; Contract fee - Regional Coordinator - Manawatu; Contract fee - Regional Coordinator - Hawkes Bay; Contract fee - Regional Coordinator - Bay of Plenty; Contract fee - Regional Coordinator - Auckland; Contract fee - Regional Coordinator - North Harbour
81717	Get Kids Active Charitable Trust	\$25,000.00	\$1,421.75	29/06/2020	Costs associated with Tough Guy Challenge
80272	Greasy Chain Charitable Trust Board	\$1,535.00	\$706.10	29/11/2019	Towards first aid and ambulance service
83157	Gymsports NZ Inc	\$100,000.00	\$1,410.00	6/08/2020	Salary - Community Sport Manager (excludes wage subsidy); Salary - National Support Administrator (excludes wage subsidy); Salary - Relationship Team Manager, excludes wage subsidy; Salary - Midlands Relationship Manager (excludes wage subsidy); Salary - Central Relationship Manager (excludes wage subsidy); Salary - Southern Relationship Manager (excludes wage subsidy)
83684	Halberg Foundation	\$120,000.00	\$3,344.00	22/09/2020	Salary - Disability Sport Advisor - Canterbury, Tasman, West Coast; Salary - Disability Sport Advisor - Wellington/Hawkes Bay; Salary - Disability Sport Advisor - Taranaki/Whanganui; Salary - Disability Sport Advisor - Bay of Plenty/Gisborne; Salary - Disability Sport Advisor - Waikato; Salary - Disability Sport Advisor - Counties Manukau
80196	Hockey NZ Inc	\$111,249.96	\$468.00	22/10/2019	Towards fee for Regional Development Programme - Tauranga; Towards salary of Community Coaching Manager; Towards salary of Community Hockey Manager - Central; Towards fee for Regional Development Programme - Canterbury; Towards fee for Regional Development Programme - Waikato; Towards salary of Community Hockey Manager - Canterbury; Towards salary of Community Hockey Manager - Participation; Towards salary of Event Manager (excludes fundraising element); Towards fee for Regional Development Programme - North Harbour; Towards fee for Regional Development Programme (Otago/Central Otago, North Otago, Invercargill, Eastern Southland); Towards salary of Community Hockey Manager - Capability; Towards salary of GM Community Hockey & Events (excludes fundraising element)
80577	Louise Perkins Foundation	\$5,000.00	\$2,300.00	29/11/2019	Salary
80701	Parkinsons NZ Charitable Trust	\$30,000.00	\$7,500.00	18/02/2020	Salary - Parkinsons Community Educator - Whanganui; Salary - Parkinsons Community Educator - Taranaki; Salary - two Parkinsons Community Educators - Bay of Plenty
82788	Special Olympics NZ	\$125,000.00	\$4,700.00	29/06/2020	Salaries - Regional Sports Coordinators; Salary - Sports Director - Auckland; Salary - Team Lead RSC - Central North Island
83209	Surf Life Saving NZ Inc	\$50,000.00	\$1,485.80	22/09/2020	Salary - Sport Manager Eastern Region; Salary - Sport Manager Central Regional; Salary - Sport Manager Southern Region
		\$633,340.36	\$26,416.75		
		Grant total	\$972,313.20		