



 **Nelson City Council**  
te kaunihera o whakatū

# AGENDA

**Meeting of the Nelson City Council  
to hear submissions to the**

**Gambling Policy Review**

**Tuesday 23 July 2013  
Commencing at 10.30am  
Council Chamber  
Civic House  
110 Trafalgar Street, Nelson**

Membership:

His Worship the Mayor Aldo Miccio, Councillors Ian Barker, Ali Boswijk (Deputy Mayor), Gail Collingwood, Ruth Copeland, Eric Davy, Kate Fulton, Paul Matheson, Jeff Rackley, Pete Rainey, Rachel Reese, Derek Shaw and Mike Ward

**23 July 2013**

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## **Apologies**

### **1. Interests**

- 1.1 Updates to the Interests Register
- 1.2 Identify any conflicts of interest in the agenda

### **2. Confirmation of Order of Business**

### **3. Submissions to the Speed Limited Bylaw Amendment**

- 3.1 Hearing Schedule **3**  
Document number 1553195
- 3.2 Submissions Index **4-5**  
Document number 1552845
- 3.3 Copy of Submissions **6-262**  
Document number 1551497

# Hearing Schedule Gambling Policy Review

Tuesday 23 July 2013

Time	Sub No.	Speaker's Name	Organisation
10.30		Welcome	
10.35	38	Emma Lamont-Messer and Terry Williamson	The Lion Foundation
10.40			
10.45	1	Dr Phil Townshend and Glen Beattie	Clubs New Zealand Incorporated
10.50			
10.55	6	Frank Saxton	
11.00	9	Jeanette Swift and Tony Crosbie	Hospitality New Zealand
11.05	30	Jarred True	On behalf of New Zealand Racing Board
11.10			
11.15	44	Graeme Ambler or Martin Sheer	Pub Charity
11.20			
11.25	28	Sally-Anne Hughes	New Zealand Community Trust
11.30			
11.35			
11.40	36	Hamish Kennedy and Frans Delanski	Nelson Tasman Hospice
11.45			
11.50	17	Dr Philip Townshend	Problem Gambling Foundation
11.55			
12.00	46	Ed Shuttleworth	Nelson Cricket Association
12.05			
12.10	43	Sue Bateup	Health Action Trust Nelson
12.15			
12.20	20	Vern Mardon	
12.25			

## Submissions Index - Gambling Policy Review

Page No.	Submission No.	First Name	Surname	Organisation	Do you wish to speak at the hearing?
6	1	Barry (Gus)	Rieper	Clubs New Zealand Incorporated	Yes
43	2	Queenie	Ballance	National Council of Woman of New Zealand	No
45	3	Carl	Jackson	Athletics New Zealand	No
46	4	Colleen	Earl	United Bowling Club/ Bowls Nelson	No
48	5	Dean	Lawrence	Spirit of Adventure Trust	No
50	6	Frank	Saxton		Yes
51	7	John	Greaney		No
53	Proforma Cover Page for identical submissions				
54	8	Annette	Robinson	Nelson A&P Association	No
55	9	Tony	Crosbie	Hospitality New Zealand, Nelson Branch	Yes
63	10	Jane and Graeme	Muir		No
53	11	Diane	Hancock	United Bowling Club	No
53	12	Bob	Hancock	United Bowling Club	No
64	13	Dianne	Armstrong	Arthritis New Zealand	No
65	14	Dominique	Leeming	Coastguard Southern and Central Regions	No
70	15	Harry	Maher	NZ Land Search & Rescue	No
72	16	Grant	Cossett	Hockey Nelson	No
74	17	Philip	Townshend	Problem Gambling Foundation of New Zealand	Yes
53	18	Christopher	Mitson		No
53	19	Ken	Meredith	Nelson Residents' Association Incorporated	No
53	20	Vern	Mardon		Yes
53	21	Julie	Carter	Camp Quality New Zealand	No
53	22	Paul	Kellett	Epilepsy Association of New Zealand Inc	No
94	23	Bruce	Burk	Bowls Nelson Inc	No
96	24	Allen	Johnson	Stoke Bowling Club	No
97	25	Matthew	McMillan	Te KAhui Hauora o Ngati Koata Trust	No
100	26	Sandy	Fontwit		No
101	27	Wanderers Cricket Club		Wanderers Cricket Club	No
103	28	Sally-Ann	Hughes	New Zealand Community Trust	Yes
120	29	Susan	Langston	Community Gaming Association	No
130	30	Jarrod	True	Harkness Henry Lawyers	Yes
53	31	Gary	Agnew	Motueka Cricket Club	No

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171	33	Ross	Wylie		No
172	34	Andrew	Flexman	Tasman Rugby Union	No
175	35	Debbie	Christie	Primary Health Organisation	No
177	36	Hamish	Kennedy	Nelson Tasman Hospice	Yes
181	37	Chris	Varcoe	Nelson Basketball Association (Inc)	No
182	38	Nigel	Murray-Brown	Lion Foundation	Yes
195	39	Hilary	Genet	Nelson Marlborough District Health Board	No
198	40	Kimberley	Waters	Canteen	No
201	41	Jackie	Gurden	Gurden Consulting Ltd	No
203	42	Stephen	Fitchett		No
209	43	Sue	Bateup	Health Action Trust Nelson	Yes
213	44	Graeme	Ambler	Pub Charity	Yes
239	45	George	Verry	United Fire Brigades' Association	No
240	46	Ed	Shuttleworth	Nelson Cricket Association	Yes
242	47	Nigel	Muir	Sport Tasman	No
53	48	Graham	Seatter	Sir Edmund Hillary Outdoor Pursuits Centre of NZ	No
244	49	Donna	Dicken	Hockey New Zealand	No
248	50	Clive	Beaumont	Nelson Bays Football	No
250	51	Gary	Hinks	Soccer Nelson / Nelson Suburbs FC	No
253	52	Jock	Sutherland		No
53	53	Karla	Lowrie	Stoke Rugby Club	No
53	54	Steffan	Eden	Stoke Rugby Club	No
53	55	Abbie	Cederman	Stoke Rugby Club	No
53	56	Todd	Austin	Stoke Rugby Club	No
53	57	Jo	Maclean	Stoke Rugby Club	No
53	58	Kirsten	Johnsen	Stoke Rugby Club	No
53	59	Stu	Tunnilliff	Stoke Rugby Club	No
53	60	Peter	Havill	Stoke Rugby Club	No
53	61	M	Lowrie	5 Woodstock Place	No
258	62	Errol	Millar	Nelson Greypower	No
260	63	Kelvin	Scoble	Wakatu Cricket Club	No
262	64	Rachael	Higgs		No
53	65	Debbie	Jordan	Nelson Basketball Association	No

**Natascha Van Dien**

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**From:** Administration Support  
**Subject:** FW: Gambling Class 4 Venue Policy Submission  
**Attachments:** Clubs NZ Submission - Nelson City Council Venue Policy Submission.pdf

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**From:** Barry Rieper [<mailto:gus@clubsnz.com>]  
**Sent:** Friday, 7 June 2013 11:29 a.m.  
**To:** Jenny Hawes  
**Cc:** Glen Beattie  
**Subject:** Gambling Class 4 Venue Policy Submission

Jenny, Please find attached Clubs New Zealand's submission on the Nelson City Council Gambling Class 4 Policy.

Clubs New Zealand wishes to be heard at the Oral Hearing. Mr. Glen Beattie, Clubs New Zealand Marlborough – Nelson Board Member will speak on our submission.

A hard copy of the Clubs New Zealand submission has been sent to the Nelson City Council.

Kind Regards

*Barry (Gus) Rieper*

**National Operations Manager**

**Clubs New Zealand Incorporated**

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Submission by

## **Clubs New Zealand**

### **Review of the Nelson City Council Class 4 Gambling Venue Policy 2007**

**10<sup>th</sup> June 2013**

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#### **1. About Clubs New Zealand**

Clubs New Zealand was formed in 1912, adopted its current structure in 1981 and changed its name from New Zealand Chartered Clubs to Clubs New Zealand in 2001. The Association represents clubs that employ over 3,800 staff and currently have over 280,000 members.

The Association's member clubs have successfully operated under the privileges, responsibilities and rights of the historic permanent charters document since as far back as 1870, in the provision of alcohol, member services and entertainment to its members. Some clubs continue to operate under their Colonial Charter while the rest have Club Licences under the Sale of Liquor Act 1989 (soon to be replaced by the Sale and Supply of Alcohol Act 2012).

Clubs New Zealand represents 300 clubs (cosmopolitan, workingmen's, RSA's, commercial traveller and sporting clubs) across communities throughout New Zealand. It works with its member clubs to provide a number of member services including but not restricted to various forms of entertainment; gaming machines and the provision of TAB outlets; while encouraging member participation in Clubs New Zealand sporting tournaments.

Clubs New Zealand offers a choice of 17 different sporting codes, catering for approximately 10,000 participants (57 National, North and South Island Clubs New Zealand tournaments per annum). This participation number excludes the hundreds of usual club sporting fixtures which normally take place throughout the country.

- 1.1 The culture which exists in clubs is one of care and protection of our members. The reason for this approach is that we believe that the quality of the environment and the culture of the organisation are keys to ensuring the protection and well being of those who choose to participate in the consumption of alcohol and playing of pokies in a safe, friendly, controlled environment. Clubs provide a culture where the consumption of alcohol and gambling are not the predominant purpose for which the premises are used but rather the social intercourse of its members through other sporting and social activities.

The nature of our member clubs enables staff and members to keep a watchful eye on our members and where appropriate act in the interest of their wellbeing.

Clubs have become the centre of communities; they provide a social focal point, and a safe and secure venue for which members can enjoy food, gaming, sports, and alcohol. Within the clubs there are host responsibility practices and policies as well as licence conditions that require food and alternative transport to be in place and available to drinkers.

All clubs must provide staff trained in harm minimisation whenever the gaming machines are operating and we believe the training provided to club staff by Clubs New Zealand (through our relationship with the Problem Gambling Foundation) is of the highest quality.

The analysis of the 2004 New Zealand health behaviours survey – alcohol use, shows that only a small proportion of drinkers drink in controlled environments where host responsibility is key (Ministry of Health, 2007). Clubs New Zealand is one of these where we take the care and protection of our members from any harm very seriously.

Questions regarding this submission should be directed to:

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National Operations Manager  
Clubs New Zealand Inc.  
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Wellington  
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Fax (04) 499 7222  
Email: [gus@clubsnz.com](mailto:gus@clubsnz.com)  
Website: [www.clubsnz.org.nz](http://www.clubsnz.org.nz)

## 2. Wish to be heard:

Glen Beattie, representing Clubs New Zealand, wishes to speak to the Clubs New Zealand submission.



### **3. Clubs New Zealand Submission**

Government clearly indicated it accepted that there is a vast difference between the provisions of machines in clubs versus pubs when it passed legislation indicating the number of machines that could be licensed in any one club venue was 18, with the single exception being that where a merger of clubs occurred, then the maximum number of machines in the venue thus created would be the number of machines operated in the clubs being merged, or 30 machines, whichever is the lesser number.

The submission highlights the reasons Clubs New Zealand believes the number of gaming machines permitted in clubs should be as stated in the Gambling Act 2003 and the Policy of Council should reflect this.

It may require additions or alterations to the Nelson City Council policy which is currently under review, to bring about these changes.

In particular, this relates to Section 95 and Section 96 of the Gambling Act 2003 in regards to clubs operating up to 18 machines and up to 30 machines if two or more clubs merge. Both of these circumstances are subject to obtaining territorial authority consent and approval from the Minister.

Clubs New Zealand asks that the council ensures the following two paragraphs are included into new policy to mirror sections 95 and 96 of the Act. This will ensure that the new policy does not impinge on the number of machines a club may be allowed to operate according to the Gambling Act 2003.

### **4. Numbers of Gaming Machines Allowed Per Venue**

- Clubs that merge shall be allowed to increase the number of machines operated at a venue in accordance with Section 95 of the Gambling Act 2003 and must not exceed the lesser of 30 or the sum of the number of gaming machines specified in all of the corporate societies' class 4 venue licences at the time of the application.
- Clubs that obtained a venue licence after 17 October 2001 may apply under Section 96 of the Gambling Act 2003 to operate up to 18 Machines.

These statements are consistent with those stated in Sections 95 and 96 of the Gambling Act 2003.

Clubs New Zealand further recommends that the policy includes the ability for relocation of all of a club's gaming machines to a new venue, as per the number of machines prior to relocation.

This gives operators the opportunity of more flexibility in their businesses, an opportunity especially in economic times such as these that may enhance their chance of viability. It would allow clubs to shift premises should the need arise through natural disaster or economic requirements such as mergers, amalgamations or upgrading of facilities.

## 5. **Net Proceeds – Applied versus Distributed**

Legislation provides for clubs to **apply** the net proceeds from their class 4 gaming machines to their community, this being the club and its members through authorised purposes.

This application of net proceeds isn't widely understood by the public as it differs markedly to the system in place for societies and trusts (who predominantly operate their machines out of pubs) that mostly **distribute** their net proceeds to the community at large by the way of grants.

While not a requirement, many clubs make it their business to involve their outside community by providing funding and making available club facilities for public functions such as fund raising events. They also offer their premises for local community groups to use, usually at no cost to the organisations involved.

## 6. **Clubs versus Pubs**

Clubs have a proven record in gambling harm minimisation. The Ministry of Health, Department of Internal Affairs, Inland Revenue Department and the Government have all found differences in the rates of presentation among people who cited gaming at pub venues and gaming at club venues as their main mode of gambling.

The Government has therefore recommended splitting the non-casino gaming machine sector into two gambling sectors – gaming machines in pubs and gaming machines in clubs, for calculating and collecting the 2013 gambling levy.

Graham Ramsey, CEO of the Problem Gambling Foundation, included the following statement in his submission to the Gambling Commission regarding the calculation of the problem gambling levy:

*"There's now recognition for the difference [between clubs and pubs]. We've been arguing about this and certainly the statistics are there."*

*"Clubs have demonstrably shown they are a safer environment. We can't see why they are lumped together with pubs."*

*"Clubs have an ethos that they are there for their members. They have invested heavily in training and other additional tools."*

The same consideration could be given to splitting Territorial Authorities (TAs) Class 4 Venue Policies, with a separate policy for Clubs (a precedent that has already been set by a number of TAs, who has separated their TAB Venue Policy from their Class 4 Venue Policy).

Such consideration would ensure that local policies which may include 'sinking lid' or 'capped' gaming machine number provisions, wouldn't impinge on local clubs and would be consistent with Sections 95 and 96 of the Gambling Act 2003.

It is this difference between pubs and clubs that proves that clubs really do care for their patrons as they are also their members. Gaming is but one small but important part of the entertainment that we provide for our members and we pride ourselves in putting our member's welfare first.

## **7. Clubs are Different to Pubs**

- Access is limited to members and guests of members.
- Alcohol and/or gambling are not the predominant purpose of the premises. Social interaction and sporting activities is the main purpose.
- Club staff know members personally. Anyone gambling excessively is quickly identifiable.
- Club staff are able to approach any potential problem gambler in a less threatening manner due to the personal rapport.
- Focus of the club management is not to provide a financial return to their owners but to ensure a safe place of entertainment and enjoyment for their members.
- Gaming proceeds are returned directly to the club for the benefit of the members.
- Clubs have modest hours of operation, frequently closing at 10pm on weekdays.

## 8. Mergers and Amalgamations

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

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

## 9. Consideration

Clubs New Zealand asks that you take into consideration the benefits that our clubs are providing to their communities through the application of class 4 gaming authorised purposes.

Clubs allow our members to safely enjoy themselves on the pokies and at the same time provide measureable returns to our local community.

We believe that with the addition or alteration to your policy, including allowing clubs to relocate their gaming venues on an as required basis; will ensure the future of safe class 4 gaming in clubs while maintaining the current overall level of class 4 gaming machines in Nelson.

*Barry (Gus) Rieper*

**National Operations Manager**  
Clubs New Zealand Incorporated

Natascha Van Dien

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**From:** Barry Rieper [gus@clubsnz.com]  
**Sent:** Thursday, 11 July 2013 2:07 p.m.  
**To:** Administration Support  
**Subject:** FW: Clubs NZ Submission to the 2013 Nelson City Council Gambling Policy Review  
**Attachments:** Clubs NZ Submission to the 2013 Nelson City Council Gambling Policy Review.pdf

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**From:** Barry Rieper  
**Sent:** Friday, 5 July 2013 12:57 p.m.  
**To:** Barry Rieper  
**Subject:** Clubs NZ Submission to the 2013 Nelson City Council Gambling Policy Review

Hi Jenny, is it possible that you could please place the attached document with the Clubs New Zealand submission on the Nelson City Council Class 4 Gambling Venue Policy review?

Doctor Phil Townsend will be accompanying Mr Glen Beattie when they speak on our submission at the policy hearing.

Thank you.


Kind Regards

*Barry (Gus) Rieper*

**National Operations Manager**



**Clubs New Zealand Incorporated**

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## **Clubs NZ Submission to the 2013 Nelson City Council Gambling Policy Review 2013**

### **Background**

Nelson City has two clubs in its jurisdiction operating NZ Racing Board and Class 4 gambling. The focus of the NCC Gambling Policies for Class 4 Gambling and for gambling offered under the Racing Act 2003 is to ensure that that these types of gambling are provided in a manner that minimises the harms of gambling.

### **The proposal to limit the number of Pokies that merging Club venues can have to a maximum of 18**

Clubs NZ objects to this proposal. We submit that the environment in which Clubs provide Class 4 gambling is demonstrably safer than that provided in the rest of the Class 4 sector, that is, the Class 4 gambling provided in pubs by the Gambling Societies. We submit that since Clubs offer safer gambling than other sectors of the gambling industry that the NCC policy should encourage Clubs as gambling providers over other providers

This contention is supported by the Ministry of Health which recently summarised this issue in its document Ministry of Health 2012 *Preventing and Minimising Gambling Harm: Consultation document*.

In this document the Ministry was produced in the context of calculating the Problem Gambling Levy which is based on the harm that can be attributed different gambling modes. In this document the Ministry argued from a variety of research sources that in that Club gambling should be separated from Pub gambling as Club gambling is demonstrably safer. The Ministry cited the only reason for not separating pub and Club gambling in reducing the levy for Clubs as the incapacity of the Inland Revenue Department to carry this out.

The following paragraphs from this document outline the evidence establishing Clubs are a safer gambling environment:

“Information from problem gambling services indicates that fewer people seek help for problems associated with club machines, even after taking into account the lower number of club machines and their lower average per-machine-spend. Machines in clubs comprised just over 20% of all licensed NCGMs as at 30 June 2011, and spending on club machines was 13.3% of all NCGM expenditure in the quarter ended 30 June 2011. By contrast, fewer than 10% of people citing NCGMs as a primary problem gambling mode in 2010/11 named club machines.

There is also growing research evidence suggesting that club machines are less likely to be associated with harm. For example, the SHORE/Whariki (2008) study found that longer times spent playing machines in clubs was associated with far fewer negative impacts on 13 domains of life than longer times spent playing machines in bars. Similar findings emerged from the Opus study of

gambling venue characteristics (In Press). It noted that 'despite clubs being found to have longer playing durations, they were also shown to have significantly lower PGSI [Problem Gambling Severity Index] scores for those gamblers that took part in the intercept survey'.

Ministry of Health 2012

The Gambling Commission when considering this very question in the 2007 and 2010 Levy rounds also noted that Clubs provided a safer gambling environment. In addition the Problem Gambling Foundation of New Zealand in its submission to the Gambling Commission and the Ministry as part of the 2012 Problem Gambling Levy round has argued from its own data recording problem gamblers presenting to its treatment services that Clubs provide a demonstrably safer gambling environment for both Class 4 and Racing Act gambling.

A copy of the Nelson Suburban Club's Harm Minimisation Gambling Policy is attached as Appendix One of this document for your information and to allow you to see the comprehensive nature of Clubs Gambling Policies.

### **The Proposal to institute a sinking lid on Pokie venues**

We support the NCC proposal for a "sinking lid" on Class 4 machine numbers in Nelson provided the provision in the Gambling Act s95 (4)b(i) for two Clubs which merge to have up to 30 gaming machines is unfettered by this aspect of the policy.

We note that although very few Clubs have used this provision in NZ that the Blenheim Club is one of those few and provides gambling in a safe environment with 30 machines.

This would not affect the sinking lid policy as where two clubs did amalgamate there would be no increase in the number of gaming machines as both clubs would bring their existing machines to the combined venue.

### **The proposal to separate the NCC Gambling Policy into two policies one for Class 4 gambling under the Gambling Act 2003 and a separate one to cover gambling under the Racing Act 2003**

We question the rationale for having a separate NCC policy for Racing Act gambling and Gambling Act gambling on the basis that any stand alone TAB would also most likely offer Class 4 gambling. There are currently 32 stand alone TAB's in NZ which also have Class 4 or pokie gambling. On this basis having a separate policy for Racing Act gambling just means these venues would have to adhere to two gambling policies that duplicate most of the conditions and aims.

### **ATM Provisions of the 2007 Policy**

Though we don't specifically object to this provision we suggest that the requirement in the policy for new venues to "not be within 100 metres of an ATM" is both outdated and redundant. The Gambling Act prohibits ATM's from being in the gambling area of a Class 4 venue and most existing venues already have ATM's located outside the defined gambling area.

## Appendix One

**Nelson Suburban Club (Incorporated)**  
**Host Responsibility Policy (Gambling at a Class 4 venue)**

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## Commitment to being a Responsible Host of a gambling venue

As a member of Clubs New Zealand, this club is committed to being a responsible host to patrons who gamble within our club and a responsible member of the wider community, which collectively hosts gambling activity in New Zealand.

Patrons of the club include members, guests accompanied by members, reciprocal visitors from affiliated clubs and any other person who is lawfully on the club's premises.

This commitment extends to the following policy areas:

- **PRODUCT Safety:** We ensure we only provide gambling opportunities that are considered safe by current New Zealand standards. When considering *new* gambling products, we take into account information available to us through appropriate formal channels suggesting which new gambling products are *least likely* to be associated with harm from gambling.
- **Socially Responsible MARKETING:** We only promote gambling activity at our club in responsible ways.
- **Restricted ACCESS:** Access to gambling areas by those prohibited by law from gambling at our venue is responsibly blocked and monitored, and access is not enhanced for others known to be vulnerable to harm from gambling, particularly problem gambling.
- **INFORMED patrons:** We ensure we provide appropriate information to patrons to enable them to assess the risks of gambling in realistic ways and to monitor their own gambling effectively.
- **Responsible VENUE DESIGN:** The gambling area of our club is designed to minimise problem gambling behaviours, and to maximise the likelihood that episodes of problem gambling will be noticed and dealt with appropriately.
- **Responsible DELIVERY:** Our club is staffed adequately to ensure that staff are able to monitor patrons for signs of problem gambling, and our staff are instructed (and appropriately trained) to intervene in appropriate ways when any patron shows signs of problem gambling behaviours.
- **Responsible INTERACTION with the COMMUNITY:** We assist the community to deal with gambling-related harm, and to plan for future gambling related activity, by sharing appropriate venue-related information and cooperating with relevant research initiatives.

### ***Harm Prevention and Minimisation Policy***

This Host Responsibility policy incorporates (but is not limited to) the following specific policy requirements of the *Gambling Act 2003*:

- Our statement of how our club “*proposes to minimise the risks of problem gambling (including the society’s policy for identifying problem gamblers)*” as required by s50(2)(c), including how the policy is communicated to patrons [s308(3)]; and
- Our statement of how our club “*proposes to minimise the risks of problem gambling and underage gambling at the class 4 venue)*”, relating policy to actual procedures at our venue, and taking into account the physical, staffing and other specific features of our club, as required by s65(2)(d); and
- Our description of why “*the possibility of persons under 18 years of age gaining access to class 4 gambling at the class 4 venue is minimal*” at our club, as required by s67(1)(b).
- Our guidelines for issuing (patron or venue initiated) exclusion orders, (under ss309-312)
- Our process for taking “*all reasonable steps to use the problem gambler identification policy to identify actual or potential ‘problem gamblers’*”, as required by s308(4), including how the policy is communicated to venue staff.

#### **Specific policies addressed below:**

- Our **PROBLEM GAMBLER IDENTIFICATION POLICY** [see 2.1 below], as required by s308(1); and
- Our **EXCLUDED PATRON IDENTIFICATION POLICY** [see 2.2 below], identifying the measures we take to ensure that this club can
  - **identify** persons who are the subject of an exclusion order issued under s309(3) or section 310(1); or subject to conditions of re-entry imposed under section 309(4) or section 310(2), and
  - take reasonable steps to **prevent their entry to the gambling area** in our club, and
  - **remove them** if they have entered the gambling area [s312(3)].
- Our **UNDER-AGE GAMBLER IDENTIFICATION POLICY** [see 2.3 below], identifying the measures we take to ensure that this club has:
  - “*effective procedures operating to minimise the possibility of a person under 18 years participating in class 4 gambling*” [s302(4)(b)], and
  - identifying the procedures we use to give “*reasonable grounds to believe*” that a person participating in class 4 gambling in our club is “*18 years or over*” [s302(5)&(6)]; and

## Specific Policies Related to Identifying Particular Patrons at Risk

### ***PROBLEM GAMBLER IDENTIFICATION POLICY***

Set out below is the **definition** of problem gambling used with our club, and a list of **visible behaviours** and/or forms of **information** that we use to **identify patrons** who we have reasonable grounds to consider as **actual or potential ‘problem gamblers’**.

Taken together, these elements constitute the “**PROBLEM GAMBLER IDENTIFICATION POLICY**” used within our club.

We also state our club policy and expectations of our staff when problem gambling behaviours are identified within our club.

### **What is problem gambling?**

- The law of New Zealand defines problem gambling as “*gambling that causes harm or may cause harm*”.
- Harm can be caused in **just one gambling session** – if a patron gambles more **money** than they can afford and so cannot pay their bills, feed their family, or meet other obligations, or gambles during **time** they should be doing other things (e.g. caring for children, going to work) and so cannot fulfil their personal or community responsibilities.
- Harm can also be caused by **frequent gambling sessions** over an **extended period**. This can cause patrons to get into debt, neglect their families, their work, or their other relationships and obligations, or even to break the law (e.g. stealing). Eventually this can lead to stresses that result in depression, alcohol abuse, family violence, lost jobs, and poorer communities. Problem gambling can even lead to death (from suicide).
- Problem gambling **hurts more people than just the gambler**, and this club recognises that we (and our staff) have a role in **preventing** problem gambling behaviours from getting started, and **intervening** if problem gambling episodes occur at our venue.

### **Who can be a ‘problem gambler’?**

In this club we recognise that:

- **Anyone** can be a problem gambler.
- Research shows that **some groups** are more likely to be at risk of problem gambling than other (e.g. the young, the elderly, unemployed, recent immigrants) but **any** patron may show signs of problem gambling.

- Anyone can *develop* a problem gambling problem, even though they did not have one before. This is more likely if they have experienced some stress in their lives that was not previously there (e.g. divorce, loss of job, bereavement).
- Research into problem gambling strongly suggests that patrons are more at risk of developing problem gambling if they are:
  - Without company or a functional support network (e.g. people new to the area, recently bereaved), and using gambling to fill an emotional need; and/or
  - Without sufficient meaningful activity (e.g. unemployed, retired), and using gambling to stop boredom, and/or
  - Uncomfortable alone in a public social situation (e.g. women in bars or clubs), and using gambling as a way to 'fit in' or not feel alone, and/or
  - Financially stressed, and considering gambling as a possible solution to financial difficulties, and/or
  - Emotionally distressed, and using gambling as a way to 'escape' their problems or unhappy mood.
- Problem gambling is *common*, especially among people who gamble regularly. Recent research in New Zealand (see DIA website) indicates that at least *one in five regular gamblers on gaming machines* might have a problem at some time. The DIA considers that "*regular gambling is gambling that occurs once a week or more*".

## What signs suggest problem gambling might be an issue?

In this club we recognise that:

- **Patron behaviours** that can indicate problem gambling include:
  - Frequent gambling sessions; and/or
  - Lengthy gambling sessions; and/or
  - Anxiety when unable to access gambling (e.g. regularly waiting for the club to open, reluctance to leave at closing time, distress when no machine available); and/or
  - Attempts to gamble in excess of normal (e.g. jamming machines so they spin without pressing buttons, attempting to play more than one machine at a time); and/or
  - Continuing to gamble after a sizeable win (e.g. a jackpot), and/or
  - Frequent attempts (especially during a gambling session) to access funds not brought venue for that purpose. This may take the form of going outside (to an ATM), attempting to cash cheques or make EFTPOS withdrawals, or even to borrow from staff or other patrons; and/or
  - Visible distress during or after a gambling session.

- **Information provided about patrons** that can indicate problem gambling include:
  - Concerns expressed by family, work mates or friends of a patron about their gambling behaviour; and/or
  - Family, work mates or friends of a patron attempting to contact patrons via the venue; and/or
  - Information provided by the patron which suggests that their personal circumstances now include high risk elements; and/or
  - Patron comments that suggest that they are concerned or worried about their own gambling behaviour.
- **Staff Observations** that can indicate that patron may not be able to make an informed choice about gambling (and therefore be at risk of problem gambling) include:
  - Behaviours indicating alcohol or other intoxication; and/or
  - Visible distress related to something other than gambling (e.g. illness, an argument).
- **Any one sign**, by itself, may indicate problem gambling. A patron does not have to show many or all signs noted above for problem gambling to be considered.

## **Our obligation to a patron showing signs of problem gambling**

In this club we recognise that is our **legal** and **good host** responsibility to:

- **Notice** signs that problem gambling is occurring at our club; and
- **Intervene** when those signs indicate potential or actual problem gambling by a patron; and
- **Respond appropriately** to actual and potential problem gambling situations, by:
  - Ensuring that the patron is "approached" at an appropriate moment; and
  - Ensuring that providing appropriate **information** (including referrals) is provided to the patron; and
  - Ensuring that the patron is treated in ways that are **sensitive, non-judgmental**, but **effective** in ensuring that the actual or potential problem gambling does not continue in our club, and
  - Issuing **exclusion orders** when appropriate.

## **Club procedures when signs of problem gambling exist**

In this club the appropriate procedures for responding to signs of problem gambling are:

- Where **patron behaviours** indicate potential or actual problem gambling:

- Staff should first **notify the duty manager** of the description, name (if known) and whereabouts of the patron about whom they are concerned, and give a factual description of the patron's behaviour(s) that raised that concern.
- The duty manager will then
  - **investigate** the concern; and
  - **decide** whether concern is warranted; and
  - if concern appears to be warranted, either "**approach**" the patron at an appropriate moment, or delegate a suitably trained staff member to do so. (For details, see 2.1.6 and 2.1.7 below.)
- Where **patron behaviours** indicating potential or actual problem gambling **continue** after the initial concern has been considered unwarranted (or **recur** during a subsequent gambling session):
  - Staff should first **notify the duty manager** of the continuing or recurring behaviours causing concern.
  - The duty manager will then
    - **investigate** the concern; and
    - **inform** staff of why the ongoing behaviour does not warrant concern; or
    - **treat the concern as now warranted** and proceed appropriately.
- Where a **patron raises concerns** (i.e. says they have a gambling problem):
  - The concern will be presumed to be warranted; and the appropriate staff alerted.
  - The duty manager will then **treat the concern as warranted** and proceed appropriately.
- In all matters where a concern has been raised about potential or actual problem gambling within the club, an appropriately dated **record** should be made by the duty manager of
  - The name and/or description of the patron about whom concern has been raised, and
  - The nature and source of the concern raised, and
  - The staff involved in raising the concern, and
  - The action taken (including a decision not to take further action) and the reasons for that action.

### Staff Guidance: How to “approach” a patron showing signs of problem gambling

This club recognises that we have a good host responsibility (as well as a legal duty [s309(1)]) to “**approach**” a patron who we have “*reasonable grounds to believe is a problem gambler*”.

- In this club the appropriate procedures for “approaching” a patron in these circumstances are interpreted as follows:
  - Such approaches to patrons should be conducted in a **sensitive, respectful** and **helpful** manner, and with understanding that the well-being of the patron is the central aim; and
  - Such approaches must be by the duty manager or a properly delegated (and trained) staff member; and
  - Such approaches should be made **proactively** and, if possible, at a **natural intervention point**. e.g.
    - A win which must be attended by a staff member,
    - A request for service (food, drinks, access to EFTPOS or change) by the patron,
    - A point where a person takes a break from gambling, and is available for conversation.
  - Staff making such approaches should be **well prepared**, with all necessary information and materials to hand before making the approach. e.g.
    - Pamphlets, cards, name of local helping agency person.
  - Such approaches should take into account the likely embarrassment of the patron, so a **relatively private space** should be offered for ongoing discussion with the patron.
- In this club the duty manager and any staff delegated to approach patrons in this regard have been given appropriate training.

### Staff Guidance: Information to provide to patron showing signs of problem gambling

This club recognises that it has a good host responsibility (as well as a legal duty [s309(1)]) to “**offer information or advice**” when we “**approach**” a patron who we have “*reasonable grounds to believe is a problem gambler*”.

We accept that we have a responsibility to make this information or advice as **effective** as possible in preventing problem gambling behaviour in our club and in our community.

- The information we offer in these circumstances includes:
  - Information about the **characteristics** and **potential risks and consequences** of problem gambling (see 2.1.1 – 2.1.3 above);
  - Information about how to get help from **problem gambling services**;

- Information about *exclusion options*;

NOTE: Club resources available to assist in providing this information are listed at 4.7.1 and location of displays of related materials is noted at 4.7.2.

- Further information and advice we offer in these circumstances includes a clear statement of ***what the club requires the patron to do*** in order to close this episode of concern.

Options include ***patron agreement*** to:

- Leave the gambling area for a break of an agreed length; or
  - Leave the gambling area for the rest of the day; or
  - Limit visits to the gambling area to an agreed number of hours per day and/or days per week; or
  - Only visit the gambling area when attended by an appropriate person (e.g. named friend) who can assist with preventing problem gambling behaviours; or
  - Complete appropriate forms requesting self-exclusion (if the patron indicates this is acceptable).
- ***Where agreement can be reached with the patron*** which will satisfy the club's concerns about the patron's potential or actual problem gambling, that the agreement is recorded and that
    - As a matter of club policy any subsequent breach of the agreement will be taken as a clear sign that the patron has problems with gambling, and that an exclusion order should be issued.
  - ***Where no agreement can be reached with the patron*** which will satisfy the club's concerns about the patron's potential or actual problem gambling, that:
    - As a matter of club policy the duty manager will "*issue an exclusion order to the person that prohibits the person from entering the gambling area of the class 4 venue [...] for a period of up to 2 years*". [s309(3)]
    - As a matter of club policy, the exclusion order issued by the duty manager will require "*the person to whom it is issued, as a condition of reentry, to participate, during the period of exclusion, in a procedure prescribed by regulations made under section 316(1)(e)*." [s309(4)].



**EXCLUDED PATRON IDENTIFICATION POLICY**

- Club procedure for issuing exclusion orders is provided at 2.2.1.
- This club maintains a **register** of all exclusion orders issued.
- Stocks of related forms and instructions for completing the register and filing exclusion orders are provided and maintained, and staff responsible for issuing exclusion orders are adequately trained.
- The register contains **sufficient description** (including a photo if possible) **of the excluded patron** for staff to be very likely to recognise the person should they be seen on the premises.
- The Manager, and all staff are required to **review the register at least once a week** to promote familiarity with persons excluded from this venue.
- Staff are **alerted** to additions to the register
  - by way of information distributed at weekly staff meetings and one to ones with Gaming Manager.
- Staff **signing** members and guests **into the club** are particularly mindful of the need to consider whether the member or guest is subject to an exclusion order.
- Where a person with an exclusion order seeks to attend the non-gambling areas of the club, all staff are **alerted** to their presence.
  - By verbal instruction from Duty Manager,
- The gambling area is monitored and checked regularly [see 3.5.4] for the presence of excluded persons.

**Staff Guidance: Club procedure for issuing exclusion orders**

- The **procedures** for managing concerns raised about actual or potential problem gambling within this club are set out in the **PROBLEM GAMBLER IDENTIFICATION POLICY** [see 2.1].
- Following these procedures may result in a patron requesting a self-exclusion order [under s310], or the manager issuing an exclusion order [under s309].
- When a self exclusion order [s310] is requested:
  - The order must be issued "**promptly**". Normal procedure at this club is for the order to be issued immediately, if requested by a patron on the premises.
  - If the self-exclusion order is requested over the phone, or by letter or email, the appropriate forms are to be posted by the end of the next business day.

- The request for a self-exclusion order must be noted in the record of problem gambling concerns [see 2.1.7].
- When a venue-initiated exclusion order [s309] is considered warranted [see policy at 2.1.7]:
  - the order is to be issued *immediately*.
- This club maintains a *register* of all exclusion orders issued.
  - The register must be completed promptly after the issue of an exclusion order, such that it contains sufficient description (including a photo if possible) of the excluded patron for staff to be very likely recognise the person should they be seen on the premises.
- The location of the register, exclusion order forms, instructions on completing the forms and filing requirements is noted at 4.5.

***UNDER-AGE GAMBLER IDENTIFICATION POLICY***

This club recognises that it has a good host responsibility (as well as a legal duty [s302]) to prevent persons under 18 years from participating in class 4 gambling within our club.

Measures taken in this club to prevent such access are:

**Limits on access to club**

- This club controls access to its premises.  
[See 3.3 Safe Access and 3.5 Responsible Venue Design.]

**Barriers to access to gambling area included in venue design**

- Barriers to access to the gambling area are described at 3.5.3.

**Relevant signage on gambling area**

- A clear sign is mounted at the entrance to the gambling area stating that entry is forbidden to club patrons aged under 18 years.

**Monitoring of gambling area for underage persons**

- The gambling machines only operate during hours of high supervision – i.e. during hours provided for in the liquor licence.
- The gambling area is monitored and checked regularly [see 3.5.4] for the presence of persons who are known to be under 18 years, or look under the age of 25 years.
- Although it is noted that persons under 18 years are not uniformly prohibited from entering the gambling area of a class-4 venue, the presence of such persons in the gambling area is actively discouraged. Patrons bringing young persons who require supervision into the club are actively encouraged to supervise those young persons, and discouraged from gambling during periods when they are responsible for providing that supervision.

**Procedure for establishing age of patrons who look under 25 years of age**

- Where a person in the gambling area is thought to look under 25 years of age, suitable proof of age is requested.
- Where a person wins a prize (e.g. a jackpot) that requires manual payment, the age of the person is considered before payment is made.
- In this club, suitable proof of age is considered to be:
  - A passport

- A New Zealand photo drivers' licence
- Club Membership Card.

## Specific Responsible Host measures implemented In this club

### **PRODUCT Safety:**

- We ensure we only provide gambling opportunities that are considered safe by current New Zealand standards within this club.

### **Current gambling products:**

- Current Class 4 gambling products provided by this venue are:
  - Electronic Gambling machines (EGMs), of the following description:
    - See Current List Attached
- All Class 4 gambling products (listed above) provided by this venue meet **current** New Zealand **legal requirements**.

In particular:

- All EGMS meet standards required by the *Gambling Act 2003*, and under the terms of our Class 4 licence.
- All EGMS purchased after 1 October 2005 display the correct time **[Reg 7(4)]**
- All EGMS purchased after 1 October 2005 provide the game information required **[Reg 7]** relating to:
  - the odds of winning the game (including the 5 top and bottom winning combinations);*
  - the average winnings paid out to players of the game over a particular period of time or a particular number of plays;*
  - the maximum and minimum player spend rate for the game*
- All EGMS purchased after 1 October 2005 provide the session information required **[Reg 8]**, via a 'pop-up' which:
  - interrupts play at regular intervals (not exceeding 30 minutes of continuous play); and*
  - informs the player of –*
    - the duration of the player's session of play; and*
    - the amount, expressed in dollars and cents, that the player has spent during the player's session of play; and*
    - the player's net wins or net losses during the player's session of play; and*
  - asks the player whether or not he or she wishes to continue with his or her session of play.*

### **New Gambling products**

- When considering new gambling products, we take into account information available to us through appropriate formal channels suggesting which new gambling products are **least likely** to be associated with harm from gambling.
- Appropriate formal channels considered by this club are: Department of Internal Affairs information bulletins (Gambits); Clubs New Zealand

communications (informed by wider sources, e.g. the development of New Zealand Best Practice Guidelines).

## ***Socially Responsible MARKETING:***

- We only promote gambling activity at our club in responsible ways.

### **Signage and information provided at the venue**

- This club has ***no exterior signage*** advertising or promoting gambling opportunities available within the club.
- ***Interior signage*** actively promotes responsible gambling, particularly by:
  - Encouraging patrons only to gamble at levels they can afford.
  - Offering written materials about problem gambling in visible and accessible locations
  - Not emphasising gambling at the expense of other club activities.
  - Not pressuring patrons to gamble.
  - Not targeting youth or other vulnerable, at risk, or disadvantaged groups.
  - Not misrepresenting prizes (e.g. jackpots), or the likelihood of winning them.

### **Newsletters and other Promotions**

- We actively ***promote responsible gambling*** in our newsletters and other promotions, particularly by:
  - Encouraging patrons only to gamble at levels they can afford.
  - Offering information about problem gambling
  - Not emphasising gambling at the expense of other club activities.
  - Not pressuring patrons to gamble.
  - Not offering promotions which reward lengthy or rapid play.
  - Not targeting youth or other vulnerable, at risk, or disadvantaged groups.
  - Not misrepresenting prizes (e.g. jackpots), or the likelihood of winning them.
- Newsletters or other promotional material relating to gambling is ***not sent to excluded patrons***.

### **Website**

- The Clubs New Zealand website makes available a generic Host Responsibility policy which is compatible with our club policy.

## Advertising

- Clubs New Zealand endorses the Advertising Standards Authority's code for Advertising Gaming and Gambling. This club does not engage in advertising outside those standards.

## **Restricted ACCESS:**

- Access to gambling areas by persons prohibited by law from gambling at our venue is responsibly prevented and monitored, and access is not enhanced for others known to be vulnerable to harm from gambling, particularly problem gambling.

## **Limiting access to club premises**

- This club is designed so we can control who has access to our premises. [See 3.5.1]

## **Preventing access to gambling areas for minors**

- This club is designed so we can limit entry to the club [see 3.5.1] and monitor the gambling area [see 3.5.2].
- Particular controls on access for minors are:
  - Our procedures for checking the age of patrons [see our **UNDER-AGE GAMBLER IDENTIFICATION POLICY** at 2.3 above].
  - Our procedures for monitoring the gambling area [see 3.5.4].
  - Special controls at times when youth have been encouraged to be on the premises (e.g. during a youth tournament)
  - CCTV surveillance of the designated gaming area and full time staffing of the Gaming Office at busy periods of time.

## **Preventing access to gambling areas for persons subject to exclusion order**

- This club is designed so we can limit entry to the club [see 3.5.1] and the gambling area [see 3.5.2].
- Particular controls on access for persons subject to an exclusion order are:
  - Our procedures for being alert to the presence of excluded persons [see our **EXCLUDED PATRON IDENTIFICATION POLICY** at 2.2 above].
  - Our procedures for monitoring the gambling area [see 3.5.4].

## **Limiting access to gambling areas for persons showing signs of being at risk of problem gambling**

- If the use of our Problem Gambler Identification Policy identifies a patron's behaviour as warranting concern, their access to the gaming area may be limited by:
  - Patron agreement (see 2.1.7 which may limit access by time, day, or other factor), or
  - Exclusion order (see 3.3.3)

## **Limiting access to gambling for club staff**

- Research has recognised that prolonged exposure to gambling is a risk factor, making venue staff a noted vulnerable group. In recognition of this,
- Our staff are forbidden to gamble at this club on any day on which they are required to work.
- Our staff are forbidden to gamble on machines when our club is closed to members.
- All of our staff receive on induction:
  - a copy of this Clubs Gambling Policy
  - a copy of "Signs of Problem Gambling".
  - Information from local problem gambling providers on problem gambling and problem gambling treatment services.

## **Not enhancing access to gambling areas for other groups known to be vulnerable to problem gambling**

- No enhanced physical access (e.g. transport) or inducements (food, drink) are provided to encourage increased gambling by groups known to be vulnerable to problem gambling.

In particular

- No enhanced gambling access is provided in ways that target days Income Support payments are made to beneficiaries.

## **Not enhancing access to prolonged gambling sessions**

- This club does not provide a reservation system for machines.

## ***INFORMED patrons:***

- We ensure we provide appropriate information to patrons to enable them to assess the risks of gambling in realistic ways and monitor their own gambling effectively.



### Types of information provided

- This club has signage related to gambling as listed below (3.4.2).
- This club has printed copies of *this* policy (which includes our Problem Gambler Identification Policy) available to give to patrons on request.
- This club has stocks of the following written materials:
  - Information about the *characteristics* and *potential risks and consequences* of problem gambling (see 2.1.1 – 2.1.3);
  - Information about how to get help from *problem gambling services*, including on-site assistance;
  - Information about *exclusion options*;
- The location of the stock of written materials is noted at 4.7.1

### Signs displayed

- The location of the signs displayed in this club is noted at 4.6. They include:
  - *Signs* indicating that we operate a **PROBLEM GAMBLER IDENTIFICATION POLICY (Reg 11)** and that copies are available on request.
  - *Signs* encouraging patrons to *gamble only at affordable levels (Reg 11) of money and time.*
  - *Signs* containing advice about *where to get assistance* for problem gambling (Reg 11).
  - *Signs* re underage gambling.

### Information for patrons displayed:

- The location of pamphlets, cards and other 'take away' information for patrons displayed in this club is noted at 4.7.2. Such information include:
  - *Pamphlets* containing general *information about problem gambling* (Reg 11).
  - *Pamphlets* and *cards* containing advice about *where to get assistance* for problem gambling (Reg 11).
  - *Pamphlets* containing *information* about *exclusion options*.
  - *Pamphlets* containing information on the *odds of winning* on gaming machines (Reg 11).

### Information provided by staff

- *All staff* are required to be aware of this Host Responsibility policy as part of their job description, and aspects of it are regularly discussed at staff meetings.

- **All staff** are trained to be aware of the location of signs and materials, and to point them out and/or provide materials to patrons on request.
- **All staff** are trained to be aware of the nature and consequences of problem gambling, and encouraged to discuss this in terms of host responsibility should a patron engage them in conversation on this topic.

## **Responsible VENUE DESIGN:**

- The gambling area of our club is designed to minimise problem gambling behaviours, and to maximise the likelihood that problem gambling will be noticed and dealt with appropriately.

### **Entry controls to club**

- This club is designed so we can control who has access to our premises. These controls include:
  - Reception desk adjacent to the entrance to the Gaming area with membership cards to be shown. This desk is staffed from 8am daily.

### **The gambling area**

- The gambling area in our club, **as defined in the Class-4 Venue licence**, consists of:
  - The area outlined and specified in the licence.
- The gambling area is positioned where it is most out of the line of sight of areas where young people are most likely to normally be present (e.g. dining area, toilets, video amusements, play areas)

### **Entry controls to gambling area**

- This club is designed so we can limit entry to the gambling area. These controls include:
  - Direct supervision of entrance from Reception desk and administration offices, CCTV coverage of entrance relayed to bar and high staffing levels of dedicated gaming office.

### **Monitoring of the gambling area**

- This club is designed so we can monitor the presence of persons in our gambling area. These controls include:
  - The gambling area is checked
    - By staff observing via **electronic monitoring** every 20 minutes.
    - By **visual check by bar staff** every 30 minutes
    - By a **staff member walking through it** every 30 minutes

- Checking *includes*
  - Checking for signs of problem gambling behaviours (per our **PROBLEM GAMBLER IDENTIFICATION POLICY** [see 2.1],
  - Checking for excluded persons, (per our **EXCLUDED PATRON IDENTIFICATION POLICY** [see 2.2])
  - Checking for persons who look under the age of 25 (per our **UNDER-AGE GAMBLER IDENTIFICATION POLICY** [see 2.3])
  - Checking for intoxicated persons

## **Gambling area environment**

- This gambling area in our club is designed to maximise patron awareness of the need to gamble responsibly, and to minimise lengthy or frequently repeated gambling sessions. These design features include:
  - This club does not provide a reservation system for machines.

## **Reality checks for gambling patrons**

- Our club recognises that patrons involved in machine gambling can lose touch with time, and not be aware of the length of time they have been gambling. In recognition of this, we provide the following 'reality checks' for patrons:
  - **Clocks** – A wall clock is visible from every part of the gambling area.
  - **Staff** monitoring the area *remind* patrons engaged in lengthy gambling sessions that it healthy to take a regular break.
  - Staff regularly walk round the gambling area.

## **Access to funds for gambling**

- Our club recognises that accessing funds for gambling in excess of those brought to the venue for that purpose is one of the signs of actual or potential problem gambling. As such, we closely monitor patron requests to access funds via club systems.
- Financial monitoring and controls include:
  - It is our policy to restrict the use of EFTPOS for gambling by notifying the duty manager where a member is repeatedly using the EFTPOS facility for gambling cash.

## **Responsible DELIVERY:**

- Our club is staffed adequately to ensure that staff are able to *monitor* patrons for signs of problem gambling, and our staff are instructed

(and appropriately trained) to *intervene* in appropriate ways when any patron shows signs of problem gambling behaviours.

## **Management commitment to harm minimisation**

- The Committee and Management of this club are fully committed to the concepts and duties of host responsibility in gambling, as expressed in this policy.

## **Appropriate staffing levels and job descriptions**

- This club ensures staffing levels are maintained to ensure adequate monitoring of patron gambling and the gambling area.
- This club ensures that the duties of monitoring patron gambling and the gambling area are adequately represented in staff job descriptions.
- Staff job descriptions are regularly updated. See 4.3.1 for location of present and past job descriptions.
- Copies of the staff list and duty roster are retained. See 4.3.2 for location of present and past records.
- These records are kept for 12 months

## **Staff training**

- **All staff** are made aware of the potential for harm from gambling, including problem gambling. In particular:
  - All staff are required to be aware of this Host Responsibility policy as part of their **job description**, and aspects of it are regularly discussed at **staff meetings**.
  - All staff are trained to be aware of the location of signs and materials, and to point them out and/or provide materials to patrons on request.
  - All staff are trained to aware of the nature and consequences of problem gambling, and encouraged to discuss this in terms of host responsibility should a patron engage them in conversation on this topic.
- **Staff with responsibility for the gaming area** have undertaken (or are undertaking) the Problem Gambling Foundation of New Zealand Harm Minimisation / Host Responsibility training (which meets the minimum requirements of *The Gambling Act 2003* and related Regulations [Reg 12]).
- A list of current staff with responsibility for the gaming area is maintained by the manager. This list shows the job title and name of each staff member, and records the dates of commencement and completion of their training.
- See 4.3.3 for location of list.

### Staff support

- Staff with responsibility for the gaming area are supported in carrying out their responsibilities under this policy by:
  - Having a job description which adequately describes their duties under this policy, and which provides for adequate time to discharge those duties, and
  - Being provided with a support package (provided by PGF) which includes:
    - Self directed study guide
    - Access to 24/7 support line for cues, information and other support in relation to interventions in problem gambling episodes.
    - Further information from Clubs NZ and PGF websites
    - Telephone or face-to-face advice from a PGF therapist /educator.

### Club procedure for intervening when signs of problem gambling noticed

- The **procedures** for managing concerns raised about actual or potential problem gambling within this club are set out in the **PROBLEM GAMBLER IDENTIFICATION POLICY** [see 2.1].
- Maintaining and safeguarding the **record** of problem gambling concerns, and consequent decisions and actions is the responsibility of the manager, who may delegate this duty to the duty manager.
  - See 4.4 for location of the record of problem gambling concerns.
  - For security, a copy of the record is made regularly 2 years. See 4.4 for storage location.

### Club procedure for dealing with enquiries from family/whanau, friends, work place, etc of patron

- Where family/whanau, friends, work place colleagues or other significant others of a patron raise concerns about a patron:
  - They will be informed that the club has a policy for identifying problem gamblers, and that we will monitor the patron's behaviour in accordance with that policy, and
  - A copy of this policy will be offered to the person making inquiries, and that this can be collected by them from the club or faxed, emailed or posted to them, and
  - The person making enquiries will be referred to the local Problem Gambling Foundation of New Zealand office where they can receive support and assistance with dealing with actual or potential gambling problems in the family, workplace or community.

- Concerns about a patron's gambling communicated to this club by family/whanau, friends, work place colleagues or other significant others of the patron *will be considered to be a 'problem gambling concern'* per our **PROBLEM GAMBLER IDENTIFICATION POLICY** [see 2.1.5], and recorded and treated as outlined therein.

### **Club procedure for issuing exclusion orders**

- The **procedures** for managing concerns raised about actual or potential problem gambling within this club are set out in the **PROBLEM GAMBLER IDENTIFICATION POLICY** [see 2.1].
- Following these procedures may result in a patron requesting a self-exclusion order [under s310], or the manager issuing an exclusion order [under s309].
- The **procedures** for issuing a patron or venue initiated exclusion order are set out in the **EXCLUDED PATRON IDENTIFICATION POLICY** [see 2.2].
- This club maintains a **register** of all exclusion orders issued. [2.2]
  - The register contains sufficient description (including a photo if possible) of the excluded patron for staff to be very likely to recognise the person should they be seen on the premises.
- The register, exclusion order forms, instructions on completing the forms and filing requirements, are kept together.
  - See 4.5 for location of the current register.
  - A camera is maintained on the premises for the purpose of taking photographs to accompany the order. See 4.5 for location.
- For security, a copy of the register is made regularly. See 4.5 for location.

**Responsible INTERACTION with the COMMUNITY:**

- We assist the community to deal with gambling-related harm, and to plan for future gambling related activity, by sharing appropriate venue-related information and cooperating with relevant research initiatives.

**Information provided to the community via Government**

- This venue supplies information to the community about gambling-related activity (including gambling related harm) via returns required by law to:
  - The Department of Internal Affairs
  - Inland Revenue
  - Department of Statistics
  - Territorial Local Authorities (TLAs)

**Other Information provided to the community**

- This club recognises that gambling may affect whole communities.
- When requested for information by recognised problem gambling helping agencies and other community groups, we will provide information available to us about gambling at this club, which may **help prevent or minimise harm from gambling** (including problem gambling), unless there is a legal impediment to sharing that information (e.g. patron privacy).
- When requested for information by recognised community groups, we will provide information available to us about gambling at this club, which may **assist with community planning in relation to gambling**, unless there is a legal impediment to sharing that information (e.g. patron privacy).
- When requested by Clubs New Zealand, this club will cooperate with research initiatives designed to assist in identifying, preventing and/or minimising harms from gambling.

## Locations Summary:

### **Relevant Licenses:**

- Notice Board in the access entrance to the gaming area.

Note: The gambling area is located in the designated supervised or restricted area as noted in our liquor licence.

### **Current version of Club Host Responsibility Policy**

- Notice Board in the access entrance to the gaming area.

### **Current Information about Staffing**

#### **Job Descriptions**

- Staff Files in General Manager's office

#### **Staff lists and duty rosters**

- Copy located on wall in staff room, posted onto the Staff Facebook page and retained with Payroll records.

#### **List of staff with responsibility for the gambling area**

- Gaming office

### **Register of Problem Gambling Concerns**

- Gaming Office

Note: Related forms (such as *proforma* agreements with patrons) and instructions are kept with the register.

For security a **copy** of the register is kept at:

- Administration Office

### **Register of Exclusion Orders Issued**

- Gaming Office

Note: Related forms and instructions (such as exclusion order forms, instructions on completing the forms and filing requirements) are kept with the register.

For security a **copy** of the register is kept at:

- Administration Office

A **camera** for taking photos of excluded persons is located:

- Administration Office

### **Relevant Signs**

#### **Exterior signage**

- This club has *no exterior signage* advertising or promoting gambling opportunities available within the club. (3.2.1)



### Interior signage

- Interior signage includes:

**Signs** indicating that we operate a **PROBLEM GAMBLER IDENTIFICATION POLICY** (Reg 11) and that copies are available on request are located:

In gaming office

Signs encouraging patrons to gamble only at affordable levels (Reg 11) of money and time are located:

- **Signs** containing advice about *where to get assistance* for Problem gambling (Reg 11) are located:

#### **Notice Board in gaming room**

- **Signs re underage gambling:**
  - A clear sign is mounted at the entrance to the gaming room stating that entry is forbidden to club patrons aged under 18 years.

## **Relevant Information Materials**

### **Stock of materials**

This club has stocks of the following written materials:

- Information about the **characteristics** and **potential risks and consequences** of problem gambling (see 2.1.1 – 2.1.3);
  - Club Resources available:
    - Club Care [pamphlets, written copies of this policy, etc]
- Information about how to get help from **problem gambling services**;
  - **Club Resources available:**
    - Club care Pamphlets
    - *Problem Gambling Foundation help 0800 664 262*
    - Copies of this policy
    - On site assistance
    - Club Care www.ClubCare.org.nz*
- Information about **exclusion options**;
  - Club Resources available:
  - Exclusion Orders
  - Pamphlets (Information on odds of winning, problem gambling, signs of problem gambling. Phone numbers to get help.

**Public Display of Information**

This club displays the following written materials in the public areas of the club for patrons to take away with them:

- **Pamphlets** containing general **information about problem gambling** (Reg 11) are located:






Gaming room

- **Pamphlets** and **cards** containing advice about **where to get assistance** for problem gambling (Reg 11) are located:

Gaming room

- **Pamphlets** containing **information about exclusion options;**
- **Pamphlets** containing information on the **odds of winning** on gaming machines (Reg 11) are located:

In Gaming room

Key to highlighted sections	
Colour	Meaning
	Relates to section in the Gambling Act 2003
	Relates to section of this Clubs NZ Host Responsibility Policy
	Clubs to personalize policies (in accordance with the Gambling Act 2003) in these spaces e.g. location of information in club
	Clubs have the option to choose "either/or" to personalize their policies (in accordance with the Gambling Act 2003)
	Statement of club policy. Each club needs to confirm that this is their policy

Natascha Van Dien

---

**From:** Submissions  
**Sent:** Thursday, 13 June 2013 3:26 p.m.  
**To:** Administration Support  
**Subject:** FW: Gambling Policy Review submission  
**Attachments:** June 2013 sub NCC gambling policy draft.doc

**Categories:** Yellow Category

-----  
**From:** Queenie Ballance[SMTP:QUEENIEBEE@CLEAR.NET.NZ]  
**Sent:** Thursday, June 13, 2013 3:26:06 PM  
**To:** Submissions  
**Subject:** Gambling Policy Review submission  
**Auto forwarded by a Rule**

I attach submission from the Local Issues group Nelson Branch National Council of Women of New Zealand

Queenie Ballance, group convener



NATIONAL COUNCIL OF WOMEN OF NEW ZEALAND (Inc)  
Te Kaunihera Wahine o Aotearoa

Nelson Branch  
6 Brougham Street  
Nelson 7010

13 June 2013

Submission on  
**STATEMENT OF PROPOSAL  
GAMBLING POLICY REVIEW**

Name: Queenie Ballance, convener Local Issues Group of Nelson Branch of National Council of Women of New Zealand (NCWNZ)

Address: 6 Brougham Street, Nelson South, Nelson 7010

Phone: 539 0459

Email: [queeniebee@clear.net.nz](mailto:queeniebee@clear.net.nz).

I do not wish to be heard.

This submission has been prepared by Nelson Local Issues Group Nelson Branch NCWNZ. The make up of the branch reflects the wider community in having a range of ages, socio-economic and educational backgrounds, and as women help to represent 50% of the ratepayers and the 'average' person.

NCWNZ works for the well-being of women, families and society by informing women, encouraging debate and action, and then conveying comment to relevant authorities. The organisation networks with member affiliations.

We support the proposals of the Nelson City Council with regards to the Gambling Policy Review. We commend the choice of 'sinking lid' policy and that with any merging of venues the number of pokie machines is restricted to a maximum of 18 machines.

We also support the separation of the current Gambling Policy into two separate policies.

We appreciate the opportunity to respond to this document

**Natascha Van Dien**

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**From:** Submissions  
**Sent:** Wednesday, 12 June 2013 4:17 p.m.  
**To:** Administration Support  
**Subject:** FW: Nelson City Gambling Review Policy

**Categories:** Yellow Category

---

**From:** Carl Jackson[SMTP:CARL@ATHLETICS.ORG.NZ]  
**Sent:** Wednesday, June 12, 2013 4:17:07 PM  
**To:** Submissions  
**Subject:** Nelson City Gambling Review Policy  
**Auto forwarded by a Rule**

To Nelson City Council,

Athletics New Zealand is against the proposed sinking lid policy that you are looking to adopt.

As a benefactor of charity funds, that are distributed through gaming trusts, we are able to deliver societal outcomes into the community on not just a national level but also on a regional level.

We recently flew up people from Athletics Nelson to a Distance Forum held in Auckland. Without charity funds, this would not be possible.

I hope that you reconsider this policy with the above in mind, and take into account the lack of funds that will be available for the community through the effects on this policy.

Thanks Carl



---

**Carl Jackson | Commercial & Marketing Manager | Athletics New Zealand**

The Pavilion Millennium Institute 17 Antares Pl Rosedale Auckland 0632  
PO Box 305 504 Triton Plaza Auckland 0757

Mob:+64 21 5285 03

Email: [carl@athletics.org.nz](mailto:carl@athletics.org.nz)

[Website](#) | [Facebook](#) | [Twitter](#)

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Natascha Van Dien

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**From:** Submissions  
**Sent:** Thursday, 13 June 2013 4:13 p.m.  
**To:** Administration Support  
**Subject:** FW: Emailing: Submission form 1 - 2013.docx  
**Attachments:** Submission form 1 - 2013.docx

**Categories:** Yellow Category

-----  
**From:** Council Enquiries (Inquiry)  
**Sent:** Thursday, June 13, 2013 4:13:16 PM  
**To:** Submissions  
**Subject:** FW: Emailing: Submission form 1 - 2013.docx Auto forwarded by a Rule

-----Original Message-----

**From:** Colleen Earl [<mailto:Colleen@printhouse.co.nz>]  
**Sent:** Thursday, 13 June 2013 2:34 p.m.  
**To:** Council Enquiries (Enquiry)  
**Subject:** Emailing: Submission form 1 - 2013.docx

<<Submission form 1 - 2013.docx>> Please find my submission attached Colleen Earl

Your message is ready to be sent with the following file or link attachments:

Submission form 1 - 2013.docx

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number	
File Ref		INITIALS	

Name Colleen Earl

Daytime phone 0274377092

Address 642 Main Road, Stoke, Nelson

Organisation represented (if applicable) United Bowling Club / Bowls Nelson

Do you wish to be heard in support of your submission?  YES  NO # of pages

\_\_\_\_\_ If you do not tick a box we will assume you do not wish to be heard.

#### Public information

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

As a member of an organisation that benefits from charitable gaming machine funding,

- Gaming machines have been in pubs in New Zealand for a long time.
- Most people play machines without any problems, the money that the machines generate for our organisation is important.
- Getting access to funding is hard enough without reducing the number of gaming machines.

I do not support the proposal by the Nelson City Council (clause 1) to place a 'sinking lid' on gaming machine numbers.

It is increasingly hard for clubs to survive these days and without the money from gaming machines many many Will not be able to continue, this would be a tragedy for young and old. Sport and other organizations are so important in keeping young people on a straight path and helping the older population in feeling a part of something And keeping active. Please don't make it even harder for us to provide something positive.

Date 13.6.2013 Signature Colleen Earl

*Help with making a submission overleaf...*



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te kaunihera o whakatū

PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

Natascha Van Dien

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**From:** Submissions  
**Sent:** Thursday, 13 June 2013 8:55 a.m.  
**To:** Administration Support  
**Subject:** FW: Submission on Gambling Policy Review  
**Attachments:** Spirit-of-Adventure-Trust-Council-Submission-Nelson-Council-2013.docx

**Categories:** Yellow Category

---

**From:** Council Enquiries (Enquiry)  
**Sent:** Thursday, June 13, 2013 8:54:58 AM  
**To:** Submissions  
**Subject:** Submission on Gambling Policy Review  
**Auto forwarded by a Rule**

## Submission on Gambling Policy Review

**Your name**

Dean Lawrence

**Organisation represented (if applicable)**

Spirit of Adventure Trust

**Your address**

PO Box 2276  
Shortland Street  
Auckland

**Your phone number**

09 3732060

**Your email address**

[dean.lawrence@spiritofadventure.org.nz](mailto:dean.lawrence@spiritofadventure.org.nz)

**Would you like to talk about your submission at a hearing?**

No

**Your submission**

**Would you like to upload a file in support of your submission?**

Spirit-of-Adventure-Trust-Council-Submission-Nelson-Council-2013.docx - [Download File](#)



Spirit of Adventure Trust  
Submission to Nelson City Council  
Proposed Gambling Venue Policy

The Trust notes that this form of gambling is a legalised activity in New Zealand, but does not as a matter of Trust advocacy promote any form of gambling activity, that is an individual's right to decide.

It is also worth noting that there are a range of activities or products that are both legal and readily available to people, which for a **minority** of the population are problematic and can cause issues.

- The Trust does support appropriate services or systems to be in place to assist those with problems.

Gaming Grants were distributed to charities and community groups for authorised purposes.

- Currently funding from Gaming machines in your locality assist people in your community in attending the Youth Development programmes on board the Spirit of New Zealand.
- These groups are delivering services to the communities helping to create the social fabric we all enjoy.
- There would be an impact on those services if funding was cut.
- It is an activity that generates taxable income.

Should a sinking lid policy be implemented by Council this will result in a reduction and ultimate loss of legal form of income to the charitable and community sector.

The Council policy document does not provide nor indicate any viable alternative to replace the loss of this funding stream for charitable entities.

- Council policy will deny a legal funding source to charities. Yet gambling will remain readily available through other avenues.

We would prefer to see the current capped policy retained.

Dean Lawrence  
Chief Executive Officer

6v

Frank Saxton  
417 Wakefield Quay  
Nelson 7010

Ph (03) 546 6098  
021 1556040  
[franksaxton@gmail.com](mailto:franksaxton@gmail.com)

Saturday, 8 June 2013

Gambling Policy Review  
Nelson City Council  
P.O. Box 645  
Nelson.



Submission on the Gaming Policy:

I am surprised and disappointed that the council is not seeking submissions on the 100 meter (from churches, schools etc) rule. This was the nub of the problem last time and yet this time there is to be no talk of it.

Sinking Lid.

I do not think the sinking lid policy is a good one. It does not allow for changes in the market place. As the total numbers decrease the value of the remaining ones will accrue a super normal profit to their owners. It is likely that the proportion of machines owned by the trusts will decline as the portion of the machines owned by the Clubs increases. The problem here is that the clubs grow ever grander in their buildings and fitout. The clubs of course keep the profits within themselves and return little to the community. The trusts, on the other hand, are required to be generous with their granting policy.

I wish to speak to my submission.

Yours faithfully

A handwritten signature in black ink, appearing to be "Frank Saxton". The signature is fluid and cursive, with a large initial "F" and "S".

Frank Saxton

**Natascha Van Dien**

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**From:** Submissions  
**Sent:** Friday, 14 June 2013 8:07 p.m.  
**To:** Administration Support  
**Subject:** FW: poker Machine submission  
**Attachments:** Submission form 1 - 2013.docx

**Categories:** Yellow Category

-----  
**From:** The Greaneys [[SMTP:GREANEY@XTRA.CO.NZ](mailto:SMTP:GREANEY@XTRA.CO.NZ)]  
**Sent:** Friday, June 14, 2013 8:06:45 PM  
**To:** Submissions  
**Subject:** poker Machine submission  
Auto forwarded by a Rule

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number	
File Ref		INITIALS	

Name John Greaney

Daytime phone 989135

Address 60A Abraham Heights Nelson

Organization represented(if applicable) \_\_\_\_\_

Do you wish to be heard in support of your submission?  YES of pages

\_\_\_\_\_ If you do not tick a box we will assume you do not wish to be heard.

**Public information**

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

\_\_\_\_\_

As a member of an organization that benefits from charitable gaming machine funding and also as an individual,

\_\_\_\_\_

- Gaming machines have a place within our society if individuals that play them have support if they go off the rails
- Most people play machines without any problems, but those that do have problems each individual pay a tax that is there to help them with support
- The money that the machines generate is mostly used to local support groups and organizations that do not get Central or local Government funding because of fiscal restraints. These groups and organization do so much work that benefits both Governments groups at no cost to them.
- An old saying "Play sport keep out of court".
- Getting access to funding is hard enough, without reducing the number of gaming machines.

\_\_\_\_\_

I do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on

Gaming machine numbers.

\_\_\_\_\_

Date \_\_\_\_\_ Signature \_\_\_\_\_

Help with making a submission overleaf...



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www.nelsoncitycouncil.co.nz

In the interests of saving paper the following submissions are identical to the one submitted by Annette Robinson (submission number 8, page 19):

<b>Submission No.</b>	<b>Name</b>	<b>Organisation</b>
11	Diane Hancock	
12	Bob Hancock	
22	Paul Kellett	
31	Gary Agnew	
48	Graham Seatter	The Sir Edmund Hillary Outdoor Pursuits Centre of New Zealand
53	Karla Lowrie	Stoke Rugby Club
54	Steffan Eden	Stoke Rugby Club
55	Abbie Cederman	Stoke Rugby Football Club
56	Todd Austin	Stoke Rugby Football Club
57	Jo MacLean	Stoke Rugby Club
58	Kirsten Johnsen	Stoke Rugby Club
59	Stu Tunnilliff	Stoke Rugby club
60	Peter Havill	Stoke Rugby
61	M Lowrie	
65	Debbie Jordan	Nelson Basketball Association

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only	
Submission Number	8v
INITIALS	

**RECEIVED**  
17 JUN 2013  
NELSON CITY COUNCIL  
Records

Name Annette Robinson

Daytime phone 03 544 7181

Address 8 Manchester Way Annesbrook, Nelson 7011

Organisation represented (if applicable) Nelson A & P Association

Do you wish to be heard in support of your submission?     YES  NO # of pages  
*If you do not tick a box we will assume you do not wish to be heard.*


**Public information**  
*Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.*

The consultation/proposal my submission relates to:  
Gambling Policy Review

My submission is:  
As a member of an organisation that benefits from charitable gaming machine funding,

- Gaming machines have been in pubs in New Zealand for a long time.
- Most people play machines without any problems, the money that the machines generate for our organisation is important.
- Getting access to funding is hard enough without reducing the number of gaming machines.

I do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on gaming machine numbers.

Date 14<sup>th</sup> June 2013                      Signature 

*Help with making a submission overleaf...*



**Nelson City Council**  
te kaunihera o whakatū

PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

Natascha Van Dien

---

**From:** Submissions  
**Sent:** Monday, 17 June 2013 2:43 p.m.  
**To:** Administration Support  
**Subject:** FW: Gambling Policy Review Submission  
**Attachments:** NELSON CC GAMING POLICY SUBMISSION.pdf  
  
**Categories:** Yellow Category

---

**From:** [Jeanette.Swift@hospitalitynz.org.nz](mailto:Jeanette.Swift@hospitalitynz.org.nz) [SMTP:JEANETTE.SWIFT@HOSPITALITYNZ.ORG.NZ]  
**Sent:** Monday, June 17, 2013 2:45:15 PM  
**To:** Submissions  
**Subject:** Gambling Policy Review Submission  
**Auto forwarded by a Rule**

Dear Sir/Madam,

Could you please submit this for the gambling policy.

Kind regards,  
Jeanette

**Jeanette Swift**  
Regional Manager

M:0274 305 074 F:04 384 8044  
24hr:0800 500 503 E:[jeanette.swift@hospitalitynz.org.nz](mailto:jeanette.swift@hospitalitynz.org.nz)



PO Box 3263  
Richmond 7050

 [www.hospitalitynz.org.nz](http://www.hospitalitynz.org.nz)

 Hospitality New Zealand on Twitter

 Hospitality New Zealand on Facebook



**Submission by**

**Hospitality New Zealand Nelson Branch**

**To**

**Nelson City Council**

**Gambling Policy 2013**

**June 2013**

**Hospitality New Zealand, Nelson Branch**

**PO Box 3263, Richmond, Nelson**

**Tony Crosbie, Nelson Branch Gaming Representative**

**Jeanette Swift, Regional Manager**

**Email: [jeanette.swift@hospitalitynz.org.nz](mailto:jeanette.swift@hospitalitynz.org.nz)**

**Phone: 0800 500 503 or 0274 305 074**



1. **Introduction**

- 1.1 Hospitality New Zealand is the industry association representing the majority of venues in which Class 4 gaming machines are operated.
- 1.2 The Association's membership accounts for approximately 15,000 gaming machines operated to raise funds for the community and provide entertainment to their patrons.
- 1.3 Hospitality New Zealand has approximately 2400 members throughout New Zealand and represents the majority of venue operators, operating class 4 gaming machines outside casino's and the club sector. In the Nelson Tasman area the Association has in excess of 100 members.

2. **Positive Aspects of Gambling for the Community**

- 2.1 The operation of gaming machines in Class 4 venues is a key fund raising mechanism for the community. Indeed, it is important to remember that Class 4 Gaming provides a major source of funding for community projects, educational institutes, ambulances, and amateur sports teams and innumerable other socially beneficial activities. Millions of dollars are distributed to the community every year from gaming machine societies and trusts. Monies collected by corporate societies from gaming machines in bars provide community groups and organisations with access to funds that would otherwise not be available. Without the input of gaming funds Nelson City and organisations involved would have to undertake vast fund raising activities, probably including the raising of rates.
- 2.2 The overall negative image of gaming fails to take into the account all public class 4 gaming funds must be distributed as follows: \*

For every \$100 put into a machine:

\$90 is returned to the players.

\$1.60 is allocated to cover venue expenses. \*\*

\$2.40 is used to cover the gaming society's (Trust's) administration costs.

\$2.25 is passed to central government as tax.

\$3.75 is returned to the community in the form of grants.

*\*Note: This structure does not apply to Club based gaming machines.*

*\*\*Note: This is a maximum and must be justified in terms of actual, reasonable, and necessary expenses additionally these payments are made under close and regular scrutiny of the Department of Internal Affairs.*

- 2.3 The Association and its members support the objectives of the policy with regard to the minimisation of harm caused by gambling and allowing individuals to safely participate in class 4 gambling in Nelson City Council.

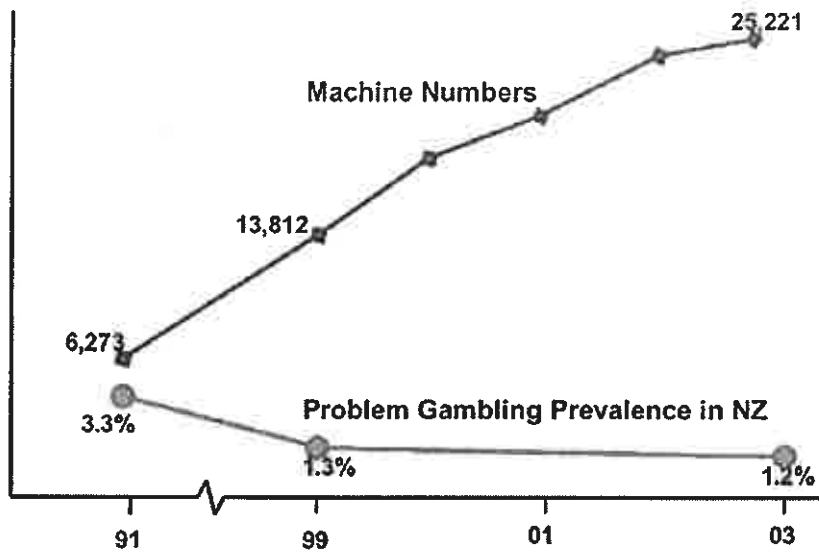
As responsible hosts our members take seriously the issue of problem gambling and their responsibilities in this area. It should be noted that while some 95% of New Zealanders gamble in some form or another, problem gambling equates to only 1-2% of the population and the vast majority of gaming machine players do so within their means for entertainment and enjoyment. Those who have a problem with gambling need to be helped; however they will not be helped by limiting the number and location of machines. Such limitations will simply reduce grants available to the community.

- 2.4 Further, all class 4 venues are strictly monitored and controlled through electronic monitoring, trust auditing and enforcement.

### **3. Gaming Machine Numbers and Problem Gambling**

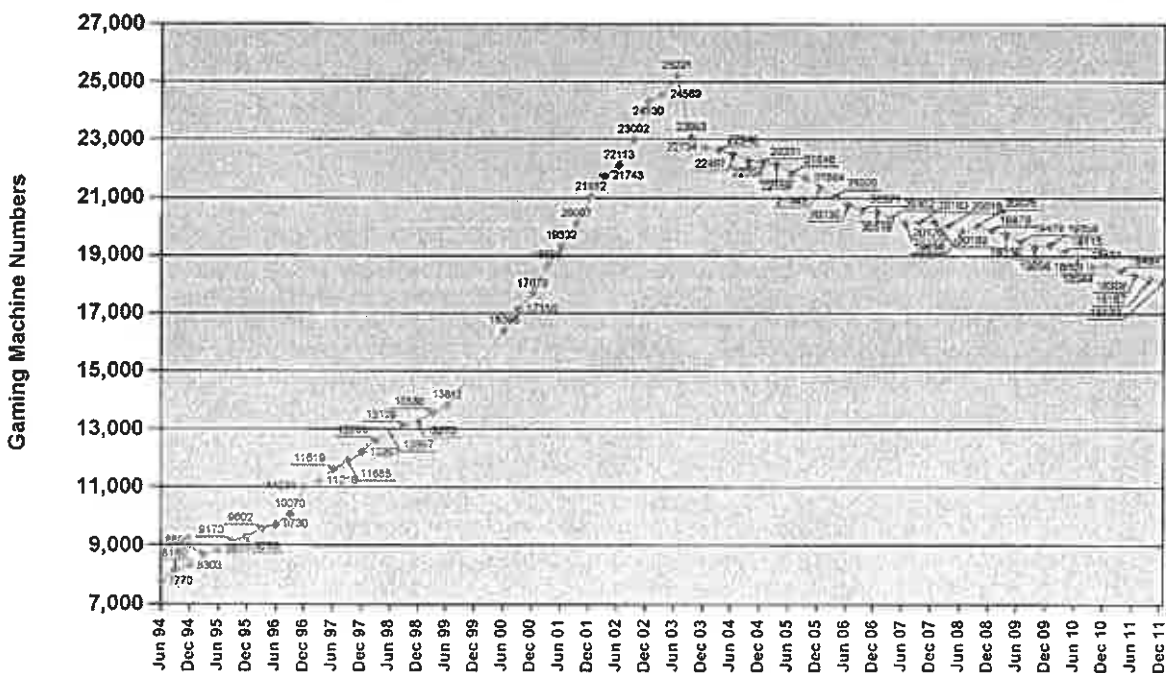
- 3.1 There is strong evidence that the number of gaming machines available in a community has no correlation to the number of problem gamblers. The graph below has been prepared from figures from Ministry of Health reports and the Department of Internal Affairs records.

## PG Prevalence risk and machine numbers



Moreover, despite the initial growth in the number of machines, shown above, the actual number of machines in New Zealand has been on a long term decline. As illustrated below (Department of Internal Affairs Publication 2011).

Gaming Machine Numbers: June 1994 to December 2011 at 3-Monthly Intervals



Importantly during this time of reducing numbers of machines coupled with increased advertising and media attention of problem gambling services the number of problem gamblers remains static and in line with historical levels. Recent *worst* estimates place only 1.4% of the population at risk (Help Seeking by Problem Gamblers, The problem Gambling foundation of New Zealand, April 2009) and current publications state that 1-2% of the population *could* be problem gamblers. (Problem Gambling Foundation Fact sheet 2 2011).

- 3.2 Problem gambling, like any addiction, is a destructive illness that requires focused treatment and attention. However, rather than reducing gaming machines via a sinking lid policy, the Association considers that education measures targeted at problem user to be more effective. These include, but are not limited to, the present measures of information on responsible gambling at venues, the use of personal exclusions and player information displays (PIDs or 'pop ups') displaying personal statistics to machine users.
- 3.3 A sinking lid policy will deter future developments of new hospitality businesses in Nelson. Gaming machines are often considered a significant component of hotels and taverns and if pokies are not an option to any new venues the investment may not be considered viable. The council should consider whether it wants to be responsible for deterring investment in hospitality in the city.

***The Number of Class 4 Gaming Machines available in New Zealand has no discernible effect on the number of problem gamblers identified. Creating a sinking lid policy will however reduce the pool of funds available for distribution in the region and deter from future investment on new hotels and taverns.***

#### **4 Differential Treatment of Clubs and Taverns.**

The differential treatment of club based and tavern based gambling frustrates the hospitality industry greatly. As set out above the money collected in tavern based gambling is closely monitored and controlled; the return to the tavern is capped at 16% and every dollar must be justified as an actual reasonable and necessary cost. Conversely the money collected in clubs may be spent on the operation of the club and the supposed generosity of clubs with the gaming funds is a fallacy. In 2000 Clubs spent

37 million dollars on their own operations and distributed 1.6 million to community. In 2005 these figures were even worse at 42 million and 1.3 million. (Department of Internal Affairs report “where do the profits go?”)

We acknowledge the reduction from 30 to 18 machines maximum following a club merger. Nonetheless clubs are still in a more favourable position than taverns and hotels.

***It is totally inappropriate to treat Clubs differently based on the presumption at they are in some way more generous or less dangerous places to gamble than taverns.***

### **5 Separating the Gaming Policy**

The Association has no objection regarding separating the Gambling Policy into two separate policies – one regarding pokie venues and the other relating to TAB venues.

#### **Summary**

Hospitality New Zealand Nelson Branch reiterates the commitment of its members to working with the Council, and with the community in which they live and operate their premises, to continue to raise vital funding for that community, and to minimising any harm caused by gambling by acting as responsible hosts and operators.

The Association members believe the Council should maintain the status quo and the current cap on gaming machines at the figure of 285. The Association does not believe that introducing a sinking lid policy will meet the Council objective of “the potential problem for problem gambling by reducing over time the number of pokie venues and machines in Nelson.” A sinking lid is not an effective response to problem gambling and instead we recommend focused education measures including information on responsible gambling at venues, the use of personal exclusions and player information displays to be more effective measures to treat individual problem gamblers.

The Association does not believe that Clubs should be treated in any way more favourably than taverns based on unsupported assumptions.

## Submission 9

We appreciate the opportunity to make the above comments and continue to be available for consultation on this important issue for the community.

**The Association wishes to be heard at the public meeting on this matter.**

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Attn Nicky Mc Donald Gambling Policy  
**Date:** Thursday, 20 June 2013 9:44:12 a.m.

---

-----  
From: Sheryl Skinner on behalf of Council Enquiries (Inquiry)  
Sent: Thursday, June 20, 2013 9:44:10 AM  
To: Submissions  
Subject: FW: Attn Nicky Mc Donald Gambling Policy  
Auto forwarded by a Rule

-----Original Message-----  
From: Jane Wickham [<mailto:j.wickham@clear.net.nz>]  
Sent: Wednesday, 19 June 2013 8:13 p.m.  
To: Council Enquiries (Enquiry)  
Subject: Attn Nicky Mc Donald Gambling Policy

Dear Nicky

We are writing in support of an amendment to the current policy on Class 4 (pokie) venues by introducing a "sinking lid" policy. We also support separating the current Gambling Policy into two separate policies - one for pokie venues and one for TAB venues to enable easier management.

Yours sincerely

Jane Wickham and Graeme Muir  
7 Barrett Court  
Stoke  
Nelson 7011 Ph 03 5474223

Nelson City Council Public Consultation Submission form

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only	
Submission Number	13
File Ref	INITIALS

Name Dianne Armstrong

Daytime phone 04 4721450

Address P O Box 10020, Wellington

Organisation represented (if applicable) Arthritis New Zealand

Do you wish to be heard in support of your submission?  YES x  NO # of pages 2

*If you do not tick a box we will assume you do not wish to be heard.*

Public information

*Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.*

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:


As a member of an organisation that benefits from charitable gaming machine funding,

> Gaming machines have been in pubs in New Zealand for a long time. Gaming has formed part of society since the beginning of time

> Most people play machines without any problems, the money that the machines generate for our organisation is vital.

> Getting access to funding is hard enough without reducing the number of gaming machines. We believe it is unfair that one form of gambling is considered. TAB and Lotto should surely be under the spotlight if Councillors believe gambling is harmful the fact that those forms are covered by different acts is an EXCUSE for you. At least sitting at a machine I am visible. Betting and buying Lotto on line I am not. 1:6 people have arthritis. Without the funding support of Gaming societies residents in Nelson may well be deprived of the advice and support needed to ensure they can participate in your community and remain in the workforce. If you continue to reduce our access to funds we will look to your solution as to how that funding stream will be replaced for the betterment of the community you represent.

I do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on gaming machine numbers.

Date 17 June 2013 Signature 

*Help with making a submission overleaf...*

1063272 - July 2012



Jackie Scrivner

From: Submissions 14 ✓  
 Sent: Thursday, 20 June 2013 2:44 p.m.  
 To: Administration Support  
 Subject: FW: Submission from Coastguard New Zealand on the Gambling Policy Review  
 Attachments: CNZSubmissionToNCCGamblingPolicyReviewJune13.pdf

Categories: Orange Category, Yellow Category

-----  
 From: Dominique Leeming [SMTP:DOMINIQUE.LEEMING@NZCOASTGUARD.ORG.NZ]  
 Sent: Thursday, June 20, 2013 2:43:16 PM  
 To: Submissions  
 Cc: Patrick Holmes  
 Subject: Submission from Coastguard New Zealand on the Gambling Policy Review  
 Auto forwarded by a Rule

Good afternoon

Please find attached a submission on the Gambling Policy Review made on behalf of Coastguard New Zealand.

Thank you for this opportunity.

Kind regards  
 Dominique

**Dominique Leeming** CFRE  
 Fundraising Manager – Coastguard Southern & Central Regions

Unit 16, 35 Riccarton Road, Christchurch 8011 | PO Box 1118, Christchurch Box Lobby, Christchurch 8140  
 ddi 03 281 8837 | mob 021 277 2291 | fax 03 348 7083 | web [www.coastguardsouth.org.nz](http://www.coastguardsouth.org.nz)



THE CHARITY SAVING LIVES AT SEA



Coastguard. This email may contain information which is confidential and/or subject to legal privilege. If you are not the intended recipient, please immediately notify the sender and delete the email.

# 14 Gambling Policy Review

Submission to the Nelson City Council

June 2012

THE CHARITY SAVING LIVES AT SEA



Royal New Zealand Coastguard Incorporated

Chartered 1910

Chartered 1910

Chartered 1910

Chartered 1910

Chartered 1910

Chartered 1910



14

**Submission to:** Nelson City Council

**Regarding:** Gambling Policy Review

**Date:** June 2013

**Address:** Gambling Policy Review  
Nelson City Council  
PO Box 645  
Nelson 7040

**Submission Author:** Patrick Holmes  
CEO  
Coastguard New Zealand

**Author Email:** [patrick.holmes@nzcoastguard.org.nz](mailto:patrick.holmes@nzcoastguard.org.nz)

**Author Phone:** 09 973 4980  
or 021 486 636

1.0 Introduction 14

This submission is from the Royal New Zealand Coastguard Incorporated (known as Coastguard New Zealand). I DO NOT wish to appear before the Council to speak to our submission.

## 1.1 Coastguard New Zealand Overview

Coastguard is the charity saving lives at sea. It is the primary provider of marine search and rescue services throughout New Zealand. This includes providing services, not only in the coastal areas, but also the major lakes and rivers of New Zealand.

Coastguard is made up of a network with four Regions (Northern, Eastern, Central and Southern) and 71 Coastguard Units (60 water based Units, 10 air patrol Units and one 24/7 Communications Unit).

Coastguard has 2,434 professional volunteers who make up its completely voluntary unpaid professional 'workforce'. This is complimented by 22 paid support staff, based in the four Regional Offices and National Office that assist in co-ordinating Coastguard activity nationwide.

Our volunteers don't ask for a cent for the work they do. They do however need the very best equipment and training that we can give them. This is why funding support from both individual New Zealanders and funding organisations is so vital.

## 1.2 Coastguard Central Region Statistics

For the year ended 30 June 2012 Coastguard volunteers responded to:

Radio calls	312,547
Calls for assistance	2,885
Calls involving the Police	454
<b>Number of people brought home to safety</b>	<b>6,634</b>
Number of volunteer hours dedicated to training, fundraising and saving lives	363,108
<b>Coastguard Volunteers</b>	<b>2,434</b>

Coastguard throughout New Zealand receives approximately \$ 14,400,000 in funding per year (figure based on a 4 year average).

Of this funding 12% comes from government and 32% from grants, including from gaming machine societies (pokie money). We estimate that 17% total Coastguard income comes from gaming machine societies.

## 2.0 Purpose

When reviewing the Gambling Policy, Coastguard New Zealand would like to strongly urge the Nelson City Council to take into consideration the significant benefits that charitable gaming societies provide by way of funding to many community groups, just like Coastguard. Without that funding, these groups would be unable to contribute to the well-being of our communities as they currently do. Volunteers and community group members are continually being pushed to provide a greater share of the burden for community

14  
activities and projects that benefit the wider community and Coastguard New Zealand contends that funding through charitable gaming societies helps to reduce those burdens.

Charity Gaming Organisations are a key provider of funds for the replacement of our designated rescue vessels that our separate local Units throughout the country are responsible for operating as well as other capital items. Without this source of funding it would be virtually impossible for our local units to raise the necessary funds required for replacement vessels and other capital items for their communities.

The 'Social Impact Assessment of the Draft Nelson City Council Gambling Policy' (SIA Report) conducted in 2006 states that only "a small minority of individuals suffer mental and/or economic harm as a result of gambling". The same report goes on to say (page 23) that the number of machines affects the amount of money distributed back to the community, therefore any reduction in numbers could have a detrimental effect on community organisations. Further it states that "funding for community groups impacts a larger percentage of the population than those affected by problem gambling".

The SIA Report recommended "leaving the number of Non-casino gaming machines at the current level" which at that time was 328.

### 3.0 Interpretation

Below are our views on clause relevant to our organisation:

- 3.1 Coastguard New Zealand does not support the Council's proposal, in amendment (i) in which the Council proposes the introduction of a 'sinking lid' policy. Coastguard New Zealand instead supports maintenance of the current cap of 285 machines agreed by the Council in 2010.
- 3.2 Coastguard New Zealand does not wish to express a view on amendment (ii) of the proposed review.

### 4.0 Conclusion

Coastguard New Zealand thanks the Council for the opportunity to submit on this important Policy Review. Coastguard believes that the proposed Gambling Policy Review creates a serious risk to many charitable, sporting and educational organisations including Coastguard.

Yours sincerely

Patrick Holmes  
CEO  
Coastguard New Zealand

**Natascha Van Dien**

---

**From:** Submissions  
**Sent:** Monday, 24 June 2013 9:07 a.m.  
**To:** Administration Support  
**Subject:** FW: Nelson CC Gambling Policy Submission  
**Attachments:** Nelson CC Gambling Policy Submission.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Yellow Category

---

**From:** Harry Maher[SMTP:CEO@LANDSAR.ORG.NZ]  
**Sent:** Monday, June 24, 2013 9:07:03 AM  
**To:** Submissions  
**Subject:** Nelson CC Gambling Policy Submission  
**Auto forwarded by a Rule**

**Harry Maher**  
Chief Executive  
NZ Land Search & Rescue

027 691-5107

## Submission on the Nelson City Council Gambling Policy Review

This submission is from the Chief Executive of New Zealand Land Search and Rescue Incorporated (LandSAR)

I can be contacted at: [ceo@landsar.org.nz](mailto:ceo@landsar.org.nz) Phone = (027) 691- 5107

### Submission

New Zealand Land Search and Rescue Inc. (LandSAR) is the volunteer organisation that supports the New Zealand Police and Rescue Coordination Centre (RCCNZ) with land based search and rescue expertise throughout New Zealand.

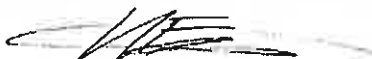
LandSAR has over 3,900 trained Search and Rescue volunteers who are members of 63 Land Search and Rescue Groups, organised into seven regions or areas throughout New Zealand. LandSAR also has specialist disciplines such as Swift Water Rescue and three national specialist Groups – Search Dogs, Alpine Cliff Rescue and Caving.

In 2011/12 LandSAR volunteers undertook 421 searches for NZ Police and the RCCNZ, rescuing 265 people and directly saving 50 lives.

Each year LandSAR applies for and receives over \$200,000 from gaming machine funded trusts both locally and nationally (e.g. Lion Foundation, NZ Community Trust). These monies are applied to support for the whole volunteer search & rescue system, going especially towards training support and equipment. Without this financial support our ability to support the NZ Police in saving lives would be significantly compromised.

LandSAR believes that the 'sinking lid' proposals contained within the Nelson City Council Gambling Policy Review have the potential to be detrimental to LandSAR and other Search & Rescue volunteer organisations as this policy will act to reduce the pool of funding available from gambling machine trusts both locally in Nelson and nationally. This reduction in available funds will reduce the opportunity for LandSAR and other volunteer groups to gain funds for Search & Rescue training and equipment.

We do not wish to be heard in support of this submission.



**Harry Maher**

Chief Executive - New Zealand Land Search and Rescue Inc.

## Natascha Van Dien

---

**From:** Submissions  
**Sent:** Monday, 24 June 2013 10:27 a.m.  
**To:** Administration Support  
**Subject:** FW: Gambling Policy Review submission.  
**Attachments:** Submission form 1 - 2013.wps

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Yellow Category

---

**From:** Helen Bennett on behalf of Council Enquiries (Inquiry)  
**Sent:** Monday, June 24, 2013 10:26:42 AM  
**To:** Submissions  
**Subject:** FW: Gambling Policy Review submission.  
**Auto forwarded by a Rule**

### Helen Bennett

Customer Service Officer

Nelson City Council  
*te kaunihera o whakatū*  
PO Box 645 Nelson 7040 New Zealand  
03 546 0227 or 027 378 7354  
[www.nelsoncitycouncil.co.nz](http://www.nelsoncitycouncil.co.nz)

---

**From:** Grant Crossett [<mailto:crossettg@xtra.co.nz>]  
**Sent:** Monday, 24 June 2013 8:34 a.m.  
**To:** Council Enquiries (Enquiry)  
**Subject:** Gambling Policy Review submission.

### Grant Crossett Contracting Ltd.

Grant Crossett BAppMgt/Dip Bus Stud  
Biodiversic ( Invasive Pest animals) management systems and design.  
Pest and predator control monitoring specialist.  
Strategic Management Consultant.  
Communications/Management/Personnel Training design and delivery.

P/F: +64 35475733

M: 0272566230

E: [crossettg@xtra.co.nz](mailto:crossettg@xtra.co.nz)

W: [www.biodiversity-and-business-management.co.nz](http://www.biodiversity-and-business-management.co.nz)

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The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number	
File Ref		INITIALS	

Name Grant Crossett

Daytime phone 035475733

Address 14 Ashbury St Stoke Nelson 7011

Organisation represented (if applicable) Hockey Nelson

Do you wish to be heard in support of your submission? **NO**

*\_\_\_\_\_ If you do not tick a box we will assume you do not wish to be heard.*

**Public information**

*Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.*

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

As a member of an organisation that benefits from charitable gaming machine funding,

- Gaming machines have been in Hotels in New Zealand for a long time.
- Most people play machines without any problems, the money that the machines generate for our organisation is important.
- Getting access to funding is hard enough without reducing the number of gaming machines.
- This is a concern as this shows a degree of social engineering and the disruption to personal choice.

I do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on gaming machine numbers.

Date 24/6/13

Signature 

Natascha Van Dien

---

**From:** Submissions  
**Sent:** Tuesday, 25 June 2013 11:36 a.m.  
**To:** Administration Support  
**Subject:** FW: Submission on the NCC Gambling Policy Review  
**Attachments:** Nelson CC Gamblinig Submission 2013.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

-----  
**From:** Phil Townshend [SMTP:PHIL.TOWNSHEND@PGFNZ.ORG.NZ]  
**Sent:** Tuesday, June 25, 2013 11:34:49 AM  
**To:** Submissions  
**Subject:** Submission on the NCC Gambling Policy Review  
**Auto forwarded by a Rule**

Hi  
Please accept my submission on the Nelson City Council Gambling Policy Review. I would like the opportunity to speak to this submission

Regards

Philp Townshend PhD Registered Psychologist | Research Director  
**Problem Gambling Foundation of New Zealand**  
**email:** [phil.townshend@pgfnz.org.nz](mailto:phil.townshend@pgfnz.org.nz) | **ph**+64 3 5482230 | **m**+64 27 2290088

*Building healthy communities together free from gambling harm*  
[www.pgfnz.org.nz](http://www.pgfnz.org.nz) | [facebook.com/pgfnz](https://www.facebook.com/pgfnz) | [twitter.com/pgfnz](https://twitter.com/pgfnz) | **Gamblefree Day 1 September**

***This communication is confidential and may be legally privileged. If you have received it in error you must not use, disclose, copy or retain it. Thank you.***

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



**Submission on the Nelson City Council's 2013 Review of the  
 Gambling Policy**

June 2013

Name: Philip Townshend

Phone 035482230 or 0272290088

50 Halifax St Nelson

I am writing this submission in my capacity as Research Director for the Problem Gambling Foundation of NZ

I would like to speak to Nelson City Council about my submission

The council have invited submissions on the proposal to changes the existing NCC Gambling Policy. I would like to confine my submission to the specific proposals for changes announced by the NCC on the understanding that except for these changes the NCC Gambling Policy will be the policy adopted in 2007.

**1. The Proposal to institute a sinking lid on Pokie venues**

I support this proposal; The NZ experience since the year 2000 shows that sinking lids do work and the disadvantages that have been attributed to them in fact do not occur. The table below shows that Pokie machine numbers and the amount lost by gamblers are closely correlated, that both peaked in the 03-05 period and that both have been decreasing consistently since that time.

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
<b>\$Million spent on Class IV pokie machines</b>												
450	597	777	941	1035	1027	906	950	938	889	849	856	854
<b>Number of Class IV machines</b>												
15000	17150	20087	24330	22497	21846	20739	20302	20182	19736	18944	18484	17943

DIA 2013

Two arguments are commonly advanced against sinking lids. One is that the reduction in machine numbers that a sinking lid would cause will result in less money coming back to the community. Not only is this argument incorrect but there are good reasons why Nelson should expect a greater level of Pokie funding in the future even with a lower number of Pokie machines as a result of a sinking lid policy.

The NZ evidence overall is that since 06 although there has been a reduction in the number of Pokies and venues, the amount of money returned to community including sports that have professional arms and racing, has not dropped significantly as demonstrated in the table below.

In NZ from 2006 to 2011 the amounts granted were

\$ 269,124,463	\$ 261,668,788	\$ 248,405,123	\$ 292,983,708	\$ 236,017,254	\$ 260,676,172
2,006	2,007	2,008	2,009	2,010	2,011

DIA 2012

It can be seen that the amount per annum dipped below the current total in some years but the average was \$261,5 million for the period which is almost identical to the most recent year for which data are available. The return to communities has continued at about the same levels as a result of the Pokie Trusts improving the proportion of the losses they return to the community.

In addition in the past the societies that operate Pokie machines tended to channel grant money into national projects and to projects based in larger cities effectively draining money from smaller centres such as Nelson. The best data available on this come from the Problem Gambling Foundation's data base which has been audited by Price Waterhouse (an audit funded by the Ministry of Health). This shows that although these societies are required to return 37.12% of Pokie losses to the community smaller communities tend to receive funding in the range of 10-12% of total losses as the balance goes into larger communities.

Over last two years and most societies have implemented policies to return higher proportions of the total gamblers losses to the community in which they were collected. As these policies come into effect Nelson can expect to receive increased Pokie funding even if as the total dollar amount lost in this area decreases.

The second and also spurious argument against sinking lids is that Councils should maintain Pokie numbers as in some way this protects people from gambling on the internet and there is evidence that internet gambling is even more harmful than Pokie gambling.

While it is true that there is good evidence that gambling on internet Pokies, Casino Games and Poker is more harmful than all other kinds of gambling, there are also good NZ prevalence studies that show that NZers are not adopting internet gambling. Only 2% of NZers gamble on the internet and this gambling is mainly the purchase of Lotto tickets (which are recognised as a low harm gambling mode) rather than the use of internet Pokies Casino Games and Poker. This view is explicitly supported by the Ministry of Health who in their 2013-2016 Gambling Harm Minimisation Plan have stated that they do not see internet gambling as becoming a significant problem in NZ during this period.

**2. The proposal to limit the number of Pokies that merging Club venues can have to a maximum of 18**

I do not support this measure as a plethora of evidence exists showing that Club venues are safer gambling environments than Pub venues. This view has been acknowledged in previous NCC documents, in the various documents prepared by the Ministry of Health and in independent research carried out in the SHORE study 2008. In Nelson there are only two Clubs that could merge and if they did the result would be a Club with 25 Pokies. On the basis of all available evidence if this were to happen the resulting club would offer an alternative to Pub Pokie gambling venues that would be safer than an 18 machine Pub venue and thus should be encouraged.

**3. The proposal to separate the NCC Gambling Policy into two policies one for Class 4 gambling under the Gambling Act 2003 and a separate one to cover gambling under the Racing Act 2003.**

I object to this proposal as it is irrelevant to Nelson.

New NZRB venues- that is, stand alone TAB's have a mixture of both Pokie gambling and TAB gambling. There are already 32 mixed Class 4 and Racing Act gambling venues like this in NZ and as the NZRB is now a registered class 4 gambling society under the Gambling Act it is reasonable to expect that any new

NZRB venue(s) in Nelson would also be mixed Act gambling venues. This undermines the rationale for separating these two types of gambling venues.

I submit that separating these Racing Act and Gambling Act into two policies would add complexity and confusion without having any practical advantage for Nelson.

**4. The proposal to retain the existing NCC Gambling Policy except for the items addressed above.**

I support the proposal to retain the existing, that is the 2007 NCC Gambling Policy with the addition of a sinking lid as retaining the 2007 gambling policy would amount to the NCC keeping faith with the robust consultative process that was undertaken in forming the this policy and as this policy is currently working very well.

Philip Townshend  
Research Director  
Problem Gambling Foundation

Ruth Killman

---

From: Administration Support  
Subject: FW: Gambling Policy Online Submission

From: Gambling Policy Online Submission  
Sent: Wednesday, September 26, 2012 7:28:45 PM  
To: Submissions  
Subject: Gambling Policy Online Submission  
Auto forwarded by a Rule

## Gambling Policy Online Submission

**Your name (required)**

Christopher Mitson

**Organisation represented (if applicable)**

**Your phone number**

548 0152

**Your address**

41 Orsman Crescent

**Your email address (required)**

[cmitson@gmail.com](mailto:cmitson@gmail.com)

**Your submission**

There is incontrovertible evidence that pokie machines are damaging to society, particularly to lower-income members of society.

I urge the council to reduce the number of pokie machines or, at the very least, to adopt a sinking lid policy and issue no more licences.

In addition, I would like to see the permitted distance from ATMs/playgrounds, schools, kindergartens, etc. doubled from the existing limits.

**You can upload a PDF, Word Document or Image in support of your submission**

**Would you like to upload file in support of your submission?**

**Would you like to speak to council in support of your submission?**

No

**Optional demographic information**

**Have you made a submission before?**

No

**Would you like to be contacted by email with future Council feedback opportunities?**

Yes

**Email address:**

[cmitson@gmail.com](mailto:cmitson@gmail.com)

Nelson Residents' Association Incorporated – Submission 20130623

**NELSON CITY COUNCIL LONG TERM COUNCIL PLAN 2012-2022**

**The Gambling Policy Review (re The Gambling Act 2003 & The Racing Act 2013)**

23 June 2013

Your ref 1326758: The Association has considered the proposals contained in this document.

**Numbers of Class 4 Gambling Machines & Venues**

Members of the association consider that in the interest of reduction of potential gambling addiction problems, the option to establish a sinking lid on class 4 gambling venues should be adopted with the present cap being reduced with immediate effect to the level of the actual number of existing installed machines as at 12 March 2013 (257).

The disadvantage cited in the consultation document that “A sinking lid is likely to have little effect on the availability of gambling in the short term” is hardly relevant in the circumstances since if such a restraint is not applied, there will be no possibility of removing the temptation of the “pokies” from our city.

The hardship caused to families by gambling addiction is real and creates unnecessary demands on the voluntary support services which are obliged to pick up the pieces.

It is our opinion that the alleged benefits provided by charitable trusts returning funding to the community are illusory and do not compensate for the monies extracted from the addicted players.

The disadvantage of possible job losses in the hospitality business should not be a problem. Any business which requires exploitation of gamblers feeding gambling machines does not deserve to be financially viable.

**Location of Class 4 Gambling Machines & Numbers**

We are surprised to see the option for removal or reduction of some or all of the current restrictions relating to location contained in the current policy has reappeared in this review bearing in mind that this was the issue which caused council to be involved in expensive litigation at the ratepayers' expense. We are totally opposed to relaxation of the present restrictions.

**Location of Automatic Teller Machines**

Automatic Teller Machines should be installed in shopping precincts for the general convenience of the community but not to provide easier access for addicted gamblers. If necessary, restrictions on the location of class 4 gambling venues may be appropriate.

**New Zealand Racing Board Venue Policy**

In view of the important contributions which the New Zealand Racing Industry provides to the country's economy, considerable employment opportunities and the pleasure enjoyed by the race-going public, we consider that the proposal to separate the gambling policy into two separate policies should be adopted by council.

Yours sincerely

Ken Meredith

Secretary/Treasurer, Nelson Residents' Association Incorporated

76 Tahunanui Drive NELSON 7011

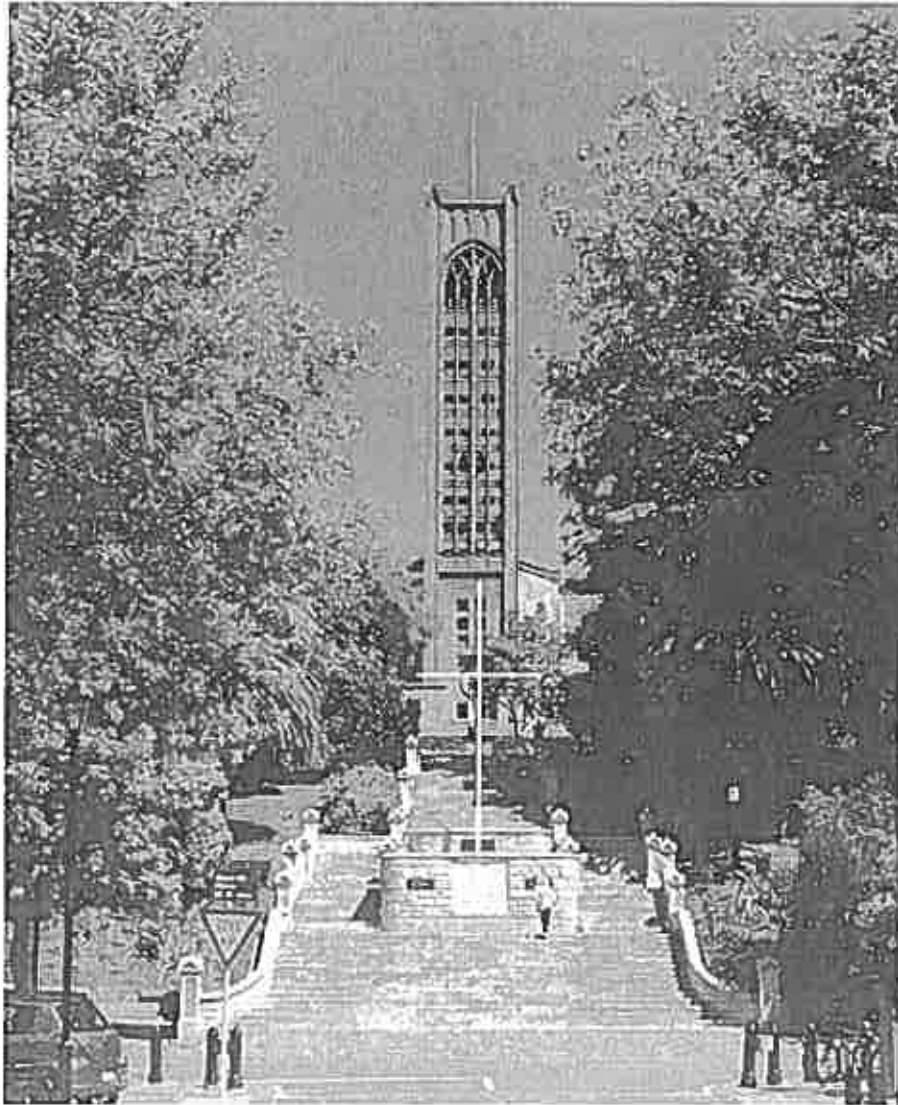
Ph:03-548-6790 Email: nelresass @ xtra.co.nz



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7 JUN 2013  
NELSON CITY COUNCIL

# Nelson City Council

## Gambling Policy Review 2013



**Submission from: Vern Mardon**

Date: 24 June 2013

## Contents

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• The Benefits of Gaming Trusts (Gaming Machines)	7
• Reasons Why Nelson City Council Proposal is Flawed	8
• Misleading Information by Many Opponents of Gaming Trusts	9
• Other Matters for Consideration	10
• Conclusion	11

## Personal Details

**Name:** Vernon (Vern) Thomas Mardon

**Postal address:** PO Box 7082 Nelson 7042

**Home address:** 202 Collingwood Street Nelson 7010

**Home phone number:** (03) 548 9993


**Work phone number:** (03) 548 8827

**Mobile phone number:** (027) 436 3869

**E-mail address:** [vern@suretyplus.co.nz](mailto:vern@suretyplus.co.nz)

I confirm that the above details are correct and that this submission has been completed by me.

Signature: \_\_\_\_\_



Vernon Thomas Mardon

Date: 24 June 2013

## Hearing

I wish to present my submission at a hearing and request that you make provision for this. My presentation will not take more than 15 minutes.

## Submission Reference

My submission relates to the following part of the Nelson City Council *Summary of Statement of Proposal Gambling Policy Review*, Document Reference 1486824.

### Clause 1

To amend the current policy on class 4 gambling (pokie) venues by introducing a 'sinking lid'. A sinking lid means that no new consents for pokie venues will be issued by Nelson City Council, with an exception for the merger of class 4 club venues (e.g. RSAs, working men's clubs, sports clubs). Where class 4 club venues merge the number of pokie machines permitted will be considered on a case-by-case basis and will not exceed a maximum of 18 machines for the merged venue. This is a change from the current policy where the maximum allowable number of machines per merged club venue is 30.

## Submission

### Nelson City Council Gambling Policy Review

#### Introduction

I am making this submission to you to **strongly oppose** Clause I of your proposal as outlined in Council Document No 1486824 **Summary of Statement of Proposal Gambling Policy Review**.

My submission is made in my capacity as an individual. However, I have considerable experience in obtaining funding from trusts in my capacity as Chair of the Saxton Field Pavilion Charitable Trust, Secretary-Treasurer of the Top of the South Athletics Charitable Trust and Secretary-Treasurer of Athletics Nelson.

#### The Proposal

The proposal is to amend the current policy on Class 4 gambling (pokie) venues by introducing a "sinking lid". Sinking lid means that no new consents for pokie venues will be issued by the Nelson City Council with an exception for the merger of Class 4 club venues (e.g. RSAs, working men's clubs, sports clubs). The proposal also states that where Class 4 club venues merge, the number of pokie machines permitted will be considered by you on a case-by-case basis and will not exceed a maximum of 18 machines for the merged venue.

### The Benefits of Gaming Trusts (Gaming Machines)

With the amount of negative publicity given to Gaming Trusts and their gaming machines (much of it unsubstantiated, emotional comment), it is important to consider the real benefits that Gaming Trusts provide for the community.

- Gaming Trusts contribute millions of dollars per year towards local community facilities and organisations. New Zealand Community Trust alone has contributed \$11.8 million funding to the Nelson region since 2003, including a substantial contribution towards the Saxton Stadium. The Nelson City Council would be hypocritical if it did not acknowledge the benefits it has received from Gaming Trusts. At Saxton Field alone, millions of dollars have been donated towards what is now recognised as one of New Zealand's most outstanding sports complexes.
- Gaming Trusts contribute funding to a very wide section of the community. Not only do they contribute to the building of facilities for sport, the arts, schools and small communities such as Victory Square, but they also enable sports and arts events to be run, and assist with coaching, teaching and travel for many of our young people.
- It should be noted that for all organisations, each year it is getting harder to fund worthwhile projects. Funding from all sources is drying up due not insubstantially to today's economic environment. By reducing the number of gaming machines, the Nelson City Council will make it even harder.
- Opponents of the Gaming Trusts, to support their cause, regularly make comments such as "donations distributed are not benefiting the 'communities that generate them' and that donations are 'not meeting priority needs', and are being siphoned off into 'corrupt purposes, other rorts... or to national bodies' ". (Quote from supporters of the Flavell Bill). These comments are wrong. Gaming Trusts are meticulous in the manner in which they accept applications for funding and subsequently, distribute the funds. While there have been a very small number of cases where there has been misuse, all the major Gaming Trusts are professional and extremely concerned to ensure that their funding helps the community.
- Most people enjoy playing the machines without any problems. It is fun for them to have a bit of a gamble and at the same time, know that as much money as possible is going back to their community. Gaming machines have been in New Zealand hotels for a long time and with very few exceptions, hotel proprietors have managed the machines well.
- Over the last 15 years, regulation for Gaming Trusts has been constantly improved to ensure it is very unlikely that funds are misused. The organisations with whom we have dealt with over the years have embraced the regulation that benefits consumers and the community.
- Gaming Trusts are being treated unfairly in the proposal, compared to RSAs, working men's clubs and sports clubs. Unlike these organisations, the profits from Gaming Trusts go to the general community as a whole.

### Reasons Why Nelson City Council Proposal is Flawed

The proposal put together by Nelson City Council (Clause 1) as outlined in Council Document No 1486824 *Summary of Statement of Proposal Gambling Policy Review* is flawed for the following reasons.

- Problem gambling prevalence has not changed in the last nine years. Statistics show that in 2006/2007, problem gambling represented 0.4% of the population; in 2011/2012 it was 0.3%. (Source: 2006/07 NZHS; July 2011 - March 2013 NZHS, preliminary findings). This indicates that despite strong publicity from the opponents of gaming machines, problem gambling is not a significant problem.
- Gaming machine numbers have unwillingly reduced by 30% since 2004, with no change in problem gambling statistics. It is therefore logical to assume that further reducing the number of gaming machines will have no impact on problem gambling.
- The amount of money spent on gambling has remained consistent. However, while TAB, Lotto and casino gambling income has increased, the income for Gaming Trusts has significantly reduced. This indicates that gamblers will spend their money regardless. If one product such as gaming machines is removed, then gamblers will spend their money on other products.
- Although statistics show that problem gambling is not limited to gaming machines, your proposal unfairly disadvantages Gaming Trusts. To compound the matter, while Gaming Trusts contribute significantly to the community, organisations such as the TAB, RSA, working men's clubs, sports clubs, and casinos contribute little or nothing to the community and utilise the profits for their own means.
- The biggest threat to problem gamblers is not gaming machines, but online gambling, behind closed doors and away from support services. Ironically, this is not monitored by the Department of Internal Affairs, and the Nelson City Council proposal makes no mention of this area of abuse.



### Misleading Information by Many Opponents of Gaming Trusts

A real issue for the general public is the considerable amount of misinformation generated by opponents of Gaming Trusts. While I appreciate that these people are sincere, I question their integrity in quoting information that is inaccurate or emotive to promote their cause. In my opinion their cause is tarnished when such information is promoted as being “absolutely right”, when in fact it is substantially flawed.

Set out below are examples of some of the misinformation promoted by these organisations, including staff members of Nelson City Council, who because of the conflict of interest should not be involved in policy making.

- ***Between 10,000 and 60,000 (0.3% and 1.8%) adults have gambling problems in New Zealand (Source: Centre for Social and Health Outcomes Research and Evaluation 2008).*** Research that shows a margin of error of 600% should be taken with a grain of salt. One suspects that the correct figure is closer to 10,000 rather than 60,000 otherwise they would have used the higher figure in their statistics. At just 0.3%, one can safely assume that problem gambling, while totally crippling for problem gamblers and their families, is not a major issue.
- ***One in five regular pokie players is likely to have a gambling problem (Source: Health Sponsorship Council 2011).*** If this is the case, based on 10,000 problem gamblers (as outlined above), only 50,000 people play the pokies. This is another example of the inaccuracy of the research.
- ***10,000 New Zealanders engage in illegal activities because of their gambling (Source: Centre for Social and Health Outcomes Research and Evaluation).*** Based on their research above, if there are 10,000 problem gamblers and their statistics are accurate, every problem gambler is involved in illegal activities!
- ***Over 74,000 New Zealanders suffer from inferior mental health because of gambling (Source: *ibid*).*** The assumption is made that gambling causes inferior mental health. While it may be so in some cases, if the research was more thorough, it would try to ascertain how many of the 74,000 were suffering from mental health, regardless of their gambling.
- ***One in six New Zealanders say a family member has gone without something they needed or a bill has gone unpaid because of gambling (Source: Health Sponsorship Council 2011).*** This is another broad sweeping statement. How accurate was their survey, but more importantly, how many people were surveyed, what cross-section of the community were surveyed, and how wide across the community was the survey conducted?

These “Statistics” were quoted in the Nelson City Council Memo to Mayor and Councillors by Jenny Hawes, Principal Adviser Community (undated) Clause 4.1 National Statistics. Her memo has shown no balance for discussion as she has not provided any information or statistics from Gaming Trusts to enable the Mayor and Councillors to make an informed decision. One would assume that council staff would be obliged to provide evidence from both sides of the discussion when putting together such a major discussion document.

### Other Matters for Consideration

As the Nelson city Council is reviewing its gaming policy, it should also review the success (or lack thereof) of organisations such as Problem Gambling Foundation. Some factors to consider are as follows.

- Class 4 contributes \$13 million of the \$18.5 million problem gambling levy used by the Ministry of Health to contract education, research and clinical services. Taking into consideration the statistics on problem gambling, is the country getting value for money when such a large amount is siphoned off to problem gambling, rather than being used in the community?
- After nine years of funding by Gaming Trusts, the community deserves much more accountability from the anti-gaming advocates for their lack of performance and misleading advice.
- An investigation of the financial accounts of Problem Gambling Foundation makes interesting reading on how their funding is utilised. The Problem Gambling Foundation owns its own building, and spends substantial money in areas other than problem gambling
- The Health Department carefully monitors problem gamblers who actually seek help. In 2011, Nelson registered 59 new problem gamblers and a total of 108 problem gamblers were assisted in the same year. Depending on the statistics used, they represent 0.25% - 1.76 % of all problem gamblers assisted, ranking Nelson 59<sup>th</sup> out of 75 areas surveyed. Nelson doesn't have a major gambling problem.

**Conclusion**

While I appreciate that there are problem gamblers who need help, they are a small minority. I am opposed to any regulation where a small minority dictates policy and regulation which impacts unnecessarily on the majority. In this case, Nelson City Council in its wisdom wishes to introduce regulation on behalf of 0.3% to 1.8% (!) of the population at the expense of 98.2 to 99.7% of the population.

I therefore strongly oppose Clause 1 of your proposal as outlined in Council Document No 1486824, ***Summary of Statement of Proposal Gambling Policy Review.***

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Submission on Gambling Policy Review  
**Date:** Wednesday, 26 June 2013 5:25:36 p.m.

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**From:** Council Enquiries (Enquiry)  
**Sent:** Wednesday, June 26, 2013 5:25:34 PM  
**To:** Submissions  
**Subject:** Submission on Gambling Policy Review  
**Auto forwarded by a Rule**

## Submission on Gambling Policy Review

**Your name**

Julie Carter

**Organisation represented (if applicable)**

Camp Quality New Zealand

**Your address**

PO Box 20430  
Bishopdale  
Christchurch 8543

**Your phone number**

03 359 6191

**Your email address**

admin@campquality.org.nz

**Would you like to talk about your submission at a hearing?**

No

**Your submission**

Camp Quality NZ is a volunteer organisation established 27 years ago, we are dedicated to bringing fun, hope & happiness to children aged 5-16 living with cancer.

Our regions organise a range of activities including week-long summer camps, family days, reunions and social occasions for our children as well as year-round support for their families.

At a cost of more than \$600,000 we deliver quality recreational programmes to upwards of 300 youngsters supported by an equal number of highly trained companions. These 'buddies' provide 24/7 one-on-one care for their campers backed up by nurses, staff and volunteers.

Charitable gaming machine funding provides significant support for our organisation by the way of grants for camp clothing, transport, accommodation and activities and general administration and meeting costs, training forums and

office equipment.

Without this funding our organisation would struggle to provide its current programmes.

The Camp Quality NZ position is that sinking lid policies do not reduce problem gambling.

We are concerned with the damage such a policy may do over time to the local charity sector through reduced availability of the funding that currently enables organisations like ours to achieve our goals.

**Would you like to upload a file in support of your submission?**

23

P O Box 3517  
Richmond 7020

Phone: 03 547 9705

Email: [bjburke@clear.net.nz](mailto:bjburke@clear.net.nz)



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28 June 2013

Nelson City Council  
P O Box 645  
Nelson

**Submission Gaming Policy Review**

Enclosed is our submission on the Gaming Policy Review.

Yours faithfully

A handwritten signature in black ink, appearing to read 'B H Burke'. The signature is written in a cursive style with a large initial 'B'.

B H Burke  
Secretary

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number: <u>23</u>	
File Ref		INITIALS	

Name BRUCE BURKE

Daytime phone 54 79 705

Address PO BOX 5517 RICHMOND

Organisation represented (if applicable) BOWLS NELSON INC.

Do you wish to be heard in support of your submission?  YES  NO # of pages

1 If you do not tick a box we will assume you do not wish to be heard.

**Public information**

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal <sup>OUR</sup> my submission relates to:  
GAMBLING POLICY REVIEW

My submission is:

- WE ARE AN ORGANISATION THAT BENEFITS FROM CHARITABLE GAMING MACHINE FUNDING
- THIS POLICY HAS THE POTENTIAL TO REDUCE THE AVAILABILITY OF FUNDS FROM GAMING TRUSTS.
- CLUBS AND COMMUNITY GROUPS COULD SUFFER FINANCIAL DIFFICULTIES IF THIS POLICY IS PURSUED.
- GAMING MACHINES HAVE BEEN IN PUBS IN NEW ZEALAND FOR A LONG TIME.
- MAJORITY OF PEOPLE PLAY MACHINES WITHOUT ANY PROBLEMS, THE MONEY THAT THE MACHINES GENERATE FOR OUR ORGANISATION IS IMPORTANT.
- GETTING ACCESS TO FUNDING IS HARD ENOUGH WITHOUT REDUCING THE NUMBER OF MACHINES

WE DO NOT SUPPORT THE PROPOSAL BY NELSON CITY COUNCIL (CLAUSE 1) TO PLACE A "SINKING FUND POLICY" ON GAMING MACHINE NUMBERS

Date 28/06/13 Signature Bruce (Bowls NZ Inc)  
SECRETARY

Help with making a submission overleaf...



PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only	
	Submission Number 24
File Ref	INITIALS

Name Allen Johnson

Daytime phone (03)5471411

Address 14 Masefield Street Stoke, Nelson 7011

Organisation represented (if applicable) STOKE BOWLING CLUB

Do you wish to be heard in support of your submission?  YES  NO # of pages

           If you do not tick a box we will assume you do not wish to be heard.

**Public information**

*Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.*

The consultation/proposal my submission relates to:

Gambling Policy Review

**RECEIVED**  
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Our submission is:

Gambling is inherent in our character which appeals to a large segment of the population.

It takes many forms, ranging from sweepstakes, raffles, Lotto tickets, horse and dog racing, and also on sports fixtures, and incidents during contests.

Without doubt, the Pokie machines are very popular with a comparatively small number, providing an outlet for their particular interest. Many forms of gambling induces punters to invest their dollars

in the avenue of their choice, and it would be manifestly unfair to apply a sinking lid policy to Pokie machine outlets only.

It is acknowledged that there is a problem with some gamblers who cannot control the urge to indulge their habit and result in financial penury, but it is their individual choice as to the form of investment he or she opts for.

Pokie machine outlets are an easier target for those who wish to impose their will on others. It is impossible to inhibit gambling activity for those who invest their dollars by way of telephone or by computer. It does, however, give the legislating authority a tool with which to appease the minority at the expense of the balance of the population who wish to indulge in a democratic right.

Yes, sporting bodies do have a vested interest, as these organisations benefit from the return of a proportion of Pokie profits to a very wide range of bodies. Without those grants sports clubs may be looking to local authorities to help fill the gap if Pokie returns were to diminish.

We feel that it would be inconsistent for a regulating body to focus on one type of outlet while ignoring others.

We do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on gaming machine numbers.



**Natascha Van Dien**

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**From:** Administration Support  
**Subject:** FW: Submission on Gambling Policy Review

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**From:** Council Enquiries (Enquiry)  
**Sent:** Monday, July 01, 2013 10:18:41 AM  
**To:** Submissions  
**Subject:** Submission on Gambling Policy Review  
**Auto forwarded by a Rule**

## Submission on Gambling Policy Review

**Your name**

Mathew McMillan

**Organisation represented (if applicable)**

Te Kahui Hauora o Ngati Koata Trust

**Your address**

50 HalifaxStreet  
Nelson

**Your phone number**

03 5482230

**Your email address**

[gambling@koata.iwi.nz](mailto:gambling@koata.iwi.nz)

**Would you like to talk about your submission at a hearing?**

No

**Your submission**

Submission on the Nelson City Council's 2013 Review of the Gambling Policy  
1st July 2013

I am making this submission in my capacity as a Problem Gambling Counsellor and Health Promoter employed by Te Kahui Hauora o Ngati Koata Trust. I work closely with Phil Townshend of PGF Nelson and we provide services in Nelson, Tasman and Blenheim. I plan to be in attendance for the reading of submissions but do not believe I will need to speak to my submission though am happy to answer questions.

It is my understanding that the NCC plans to adopt the 2007 policy except for the proposed changes it has outlined. Below are my thoughts on these proposed changes.

1. The Proposal to institute a sinking lid on Pokie venues

I support this proposal; The NZ experience since the year 2000 shows that sinking lids do work and the disadvantages that have been attributed to them in fact do not occur. The table below shows that Pokie machine numbers and the amount lost by gamblers are closely correlated, that both peaked in the 03-05 period and that both have been decreasing consistently since that time.

DIA 2013

Two arguments are commonly advanced against sinking lids. One is that the reduction in machine numbers that a sinking lid would cause will result in less money coming back to the community. Not only is this argument incorrect but there are good reasons why Nelson should expect a greater level of Pokie funding in the future even with a lower number of Pokie machines as a result of a sinking lid policy.

The NZ evidence overall is that since 2006 although there has been a reduction in the number of Pokies and venues, the amount of money returned to community including sports that have professional arms and racing, has not dropped significantly as demonstrated in the table below.

In NZ from 2006 to 2011 the amounts granted were

DIA 2012

It can be seen that the amount per annum dipped below the current total in some years but the average was \$261,5 million for the period which is almost identical to the most recent year for which data are available. The return to communities has continued at about the same levels as a result of the Pokie Trusts improving the proportion of the losses they return to the community.

In addition in the past the societies that operate Pokie machines tended to channel grant money into national projects and to projects based in larger cities effectively draining money from smaller centres such as Nelson. The best data available on this come from the Problem Gambling Foundation's data base which has been audited by Price Waterhouse (an audit funded by the Ministry of Health). This shows that although these societies are required to return 37.12% of Pokie losses to the community smaller communities tend to receive funding in the range of 10-12% of total losses as the balance goes into larger communities.

Over last two years and most societies have implemented policies to return higher proportions of the total gamblers losses to the community in which they were collected. As these policies come into effect Nelson can expect to receive increased Pokie funding even if as the total dollar amount lost in this area decreases.

The second and also spurious argument against sinking lids is that Councils should maintain Pokie numbers as in some way this protects people from gambling on the internet and there is evidence that internet gambling is even more harmful than Pokie gambling.

While it is true that there is good evidence that gambling on internet Pokies, Casino Games and Poker is more harmful than all other kinds of gambling, there are also good NZ prevalence studies that show that New Zealanders are not adopting internet gambling. Only 2% of NZers gamble on the internet and this gambling is mainly the purchase of Lotto tickets (which are recognised as a low harm gambling mode) rather than the use of internet Pokies Casino Games and Poker. This view is explicitly supported by the Ministry of Health who in their 2013-2016 Gambling Harm Minimisation Plan have stated that they do not see internet gambling as becoming a significant problem in NZ during this period. I believe it is important for the NCC to be aware of the fact that over 80% of people presenting to problem gambling services in Nelson identify the Pub Pokies as their main form of harmful gambling, with over one third being family members and others affected rather than being the problem gambler themselves. Approximately 32% of people presenting to our service identify as being Maori.

2. The proposal to limit the number of Pokies that merging Club venues can have to a maximum of 18.

I do not support this measure as a plethora of evidence exists showing that Club venues are safer gambling environments than Pub venues. This view has been acknowledged in previous NCC documents, in the various documents prepared by the Ministry of Health and in independent research

## Submission 25

carried out in the SHORE study 2010. In Nelson there are only two Clubs that could merge and if they did the result would be a Club with 25 Pokies. On the basis of all available evidence if this were to happen the resulting club would offer an alternative to Pub Pokie gambling venues that would be safer than an 18 machine Pub venue and thus should be encouraged.

3. The proposal to separate the NCC Gambling Policy into two policies one for Class 4 gambling under the Gambling Act 2003 and a separate one to cover gambling under the Racing Act 2003. I object to this proposal as it is irrelevant to Nelson.

New NZRB venues- that is, stand alone TAB's have a mixture of both Pokie gambling and TAB gambling. There are already 32 mixed Class 4 and Racing Act gambling venues like this in NZ and as the NZRB is now a registered class 4 gambling society under the Gambling Act it is reasonable to expect that any new NZRB venue(s) in Nelson would also be mixed Act gambling venues. This undermines the rationale for separating these two types of gambling venues.

I submit that separating these Racing Act and Gambling Act into two policies would add complexity and confusion without having any practical advantage for Nelson.

4. The proposal to retain the existing NCC Gambling Policy except for the items addressed above. I support the proposal to retain the existing, that is the 2007 NCC Gambling Policy with the addition of a sinking lid as retaining the 2007 gambling policy would amount to the NCC keeping faith with the robust consultative process that was undertaken in forming this policy and as this policy is currently working very well.

With Thanks

Mathew McMillan  
Te Kahui Hauroa o Ngati Koata Trust

**Would you like to upload a file in support of your submission?**

**Ruth Killman**

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**From:** Administration Support  
**Subject:** FW: Gambling Policy Online Submission

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**From:** Gambling Policy Online Submission  
**Sent:** Thursday, October 04, 2012 9:32:16 AM  
**To:** Submissions  
**Subject:** Gambling Policy Online Submission  
Auto forwarded by a Rule

## Gambling Policy Online Submission

**Your name (required)**

Sandy Fontwit

**Organisation represented (if applicable)****Your phone number**

03-5451334

**Your address**

26 Athol Street

**Your email address (required)**[sandyfontwit@slingshot.co.nz](mailto:sandyfontwit@slingshot.co.nz)**Your submission**

Gambling should be tightly regulated in Nelson to minimize harm to people who cannot afford to lose money and cannot control their compulsive behavior. The potential for harm far outweighs any return of money to the public by gambling interests, which is hypocritical at best. Even the term "gaming machines" is a hypocritical manipulation of language which attempts to erase the serious connotations of gambling and substitute the idea of "fun and games." A more apt term is "one armed bandits." These devices with their flashing lights and sounds are completely mindless and addictive ways of losing money (we all know the House Always Wins), requiring not even the lowest level of skill. Since most politicians, both local and national, are totally gutless and will not support an outright ban, I support the "sinking lid" proposal.

**You can upload a PDF, Word Document or Image in support of your submission****Would you like to upload file in support of your submission?****Would you like to speak to council in support of your submission?**

No

**Optional demographic information****Have you made a submission before?****Would you like to be contacted by email with future Council feedback opportunities?**

No

**Email address:**[sandyfontwit@slingshot.co.nz](mailto:sandyfontwit@slingshot.co.nz)

The Nelson City Council wants your opinion.  
Please tell us what you think.  
Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number	
File Ref		INITIALS	

Name Wanderers Cricket Club

Daytime phone 03-5423344

Address P.O.Box 46 Brightwater, Nelson

Organisation represented (if applicable) \_\_\_\_\_

Do you wish to be heard in support of your submission?     YES     NO    # of pages

\_\_\_\_\_ *If you do not tick a box we will assume you do not wish to be heard.*

**Public information**

*Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.*

The consultation/proposal my submission relates to:

\_\_\_\_\_ **Gambling Policy Review** \_\_\_\_\_

My submission is:

\_\_\_\_\_ As a member of an organisation that benefits from charitable gaming machine funding, \_\_\_\_\_

\_\_\_\_\_ > Gaming machines have been in pubs in New Zealand for a long time. \_\_\_\_\_

\_\_\_\_\_ > Most people play machines without any problems, the money that the machines generate for our organisation is important. \_\_\_\_\_

\_\_\_\_\_ > Getting access to funding is hard enough without reducing the number of gaming machines. \_\_\_\_\_

\_\_\_\_\_ Our sporting Club would be unable to survive without gaming funding. \_\_\_\_\_

\_\_\_\_\_ The problem gamblers that are targeted in the sinking lid policy will still gamble in some form.  
So the policy is a waste of time and hitting at other well worth while groups that are integral parts of our community.

I do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on gaming machine numbers. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date 1.7.2013 Signature D.Drogemuller

*Help with making a submission overleaf...*



**Nelson City Council**  
te kaunihera o whakatū

PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

### How to make a submission

Remember to have your say – online or in writing. You can make a submission online at the Council's website, [www.nelsoncitycouncil.co.nz](http://www.nelsoncitycouncil.co.nz), at Civic House, 110 Trafalgar Street, Nelson, or any of the Nelson Public Libraries. More information is available in all these locations, or you can phone 546 0200 to ask for it to be posted.

All submissions will be considered by Councillors before making a decision.

Anyone can make a submission. All submissions are publicly available, as required by the Local Government Act 2002. Submissions will be used only for the purposes of this consultation process.

Early submissions are appreciated, to help submission processing.

### Identify your submission

Please make sure you attach the cover sheet/submission form to any submission you make to assist in tracking submissions. Please number all the pages of your submission and put your name at the bottom of all pages. This will help if any become detached from your cover sheet. If you choose not to use this cover sheet, please include your name, address and contact telephone number. This is so we can contact submitters who wish to speak at the hearings, and so we can reply to you with the result of Council's deliberations on submissions.

### Make it readable

Type your submission if possible, or use black ink and write legibly on one side of paper only. This will ensure the photocopies we make of your submission will be easy to read.

### Separate headings

Divide your submission into separate points if you want to comment on more than one part, to help Council understand your submission better. For each point, say specifically to which part(s) your submission relates. Say concisely what your concern is OR what you support. Tell us the reasons why you support or oppose this part, and say how you want the Council to respond to your submission.

Send your  
submission to: Freepost 76919  
Consultation  
Nelson City Council  
PO Box 645  
Nelson 7040

or deliver to: Civic House, ground  
floor  
110 Trafalgar Street,  
Nelson

or: any Nelson Public  
Library

or: By email to  
[enquiry@ncc.govt.nz](mailto:enquiry@ncc.govt.nz)



**Submission to  
Nelson City Council  
on the proposed  
Gambling Venues Policy**

**2 July 2013**

## Executive summary

This submission gives an overview of pub gaming in New Zealand and an introduction to New Zealand Community Trust (NZCT). It outlines our response to the Council's proposed gambling venues policy.

NZCT opposes your proposal to introduce a sinking lid policy for the following reasons:

- The Nelson community will lose out on the funding that the lost gaming machines currently provide.
- Reducing the number of machines will not reduce the number of problem gamblers in the city. Research shows that despite machine numbers dropping by 12 per cent in New Zealand since 2007, problem gambling has remained at relatively low levels (currently 0.3 per cent of the population according to the 2011 Ministry of Health National Health Survey).
- The issue of problem gambling needs to be considered in context. The ratio of problem gamblers in the Nelson City is the same as the national average (2.9 per thousand people). Furthermore, the social cost of problem gambling is only a fraction of that caused by alcohol, tobacco and other drugs.
- Robust systems and significant funding is in place to support problem gamblers, including two problem gambling service providers in Nelson.
- Pub gaming machines can only be played in a strictly controlled environment and they are a valid entertainment choice for residents who play responsibly. They are also an important component of your local hospitality sector.

We realise that Nelson City Council wants to be seen to be implementing a fair and balanced policy that takes account of both the good and the harm associated with Class 4 gambling. However, far more people in the region will be affected negatively rather than positively if the Council introduces a sinking lid policy.

The end result of a sinking lid policy is likely to be many anxious community organisations and their members, who face even more uncertainty about their future funding. It may also cause deterioration in the quality of existing gaming venues because landlords know they have 'captive' tenants (and therefore have no incentive to upgrade their buildings).

Your 7,000 recreational pokie players may feel their Council is treating them as if they were all problem gamblers. Finally, there is likely to be absolutely no change in problem gambling statistics.

Our recommendation is to cap machine numbers at the current level (257). At this level the machine density of 5.9 is higher than the national average of 4.5 machines per thousand people, but the rate of problem gambling in Nelson appears to be no higher than the national average.

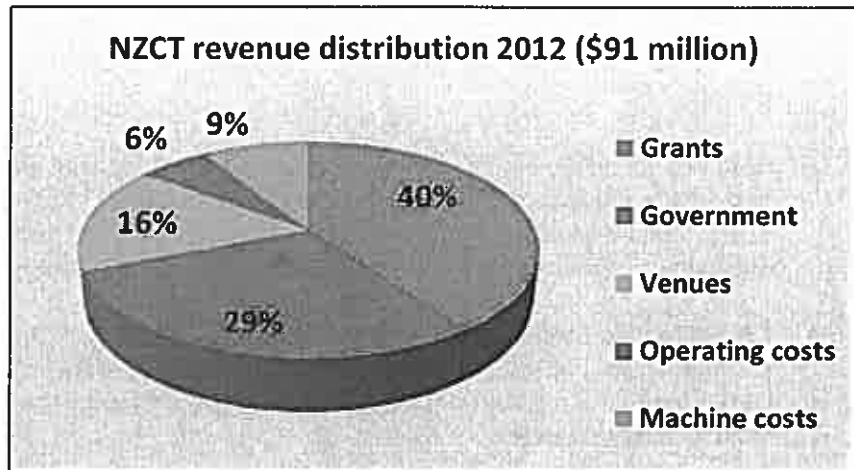
It is likely that machine numbers will continue to fall, even with a cap, as the national trend has been a decline of 2-3 per cent per annum for many years. However publicans operating gaming machines will have slightly more flexibility to move to better venues in lower risk areas, if there is any margin that opens up under the cap, and community organisations will be reassured that their funding is slightly more secure.



## Introduction

In most countries, gambling is purely for commercial gain. New Zealand is different. We are one of only a few countries in the world with a unique 'community owned' model for pub gaming, where the net proceeds are returned to the community instead of the private sector.

A minimum of 37.12 per cent of gross gaming proceeds is required by law to go back to the community in the way of grants. Last year NZCT returned 40 per cent of gross machine proceeds to New Zealand communities.



A further 29 per cent goes to the Government in duties and levies. The balance goes to the pubs that host the gaming machines and the trusts that administer them.

Pub gaming brings many benefits to New Zealand. BERL research <sup>1</sup> has calculated that the entertainment value to recreational players is circa \$250m, the grants value to the community is circa \$250m, and the government revenue value in the form of duties and levies is circa \$190m. If sinking lid policies are introduced more widely across the country, these benefits will clearly decrease.

NZCT is one of New Zealand's largest gaming trusts. Our publicans raise funds by operating gaming lounges within their hotels. We have twin goals of serving both our publicans and the communities in which they operate. NZCT plays a significant role within the New Zealand amateur sporting fraternity. While amateur sport in New Zealand is our main focus, we are also a strong supporter of other worthy community activities, including local government projects. In the 12 months to 31 December 2012, we distributed \$38.7 million to sporting, local government and community groups nationwide.



NZCT has three venues in Nelson and during the last year, they enabled us to return \$614,520 (115% of the funds available) to your community. Funds available for distribution for the period 1st January to 31st December 2012 amounted to \$534,583, from total generated

revenue of \$1,425,141 (37.5%). In addition, we funded a host of national bodies such as Lifelight Trust, Spirit of Adventure, Yachting NZ and Outward Bound, which also benefit the people of Nelson.

<sup>1</sup> Maximising the benefits to communities from New Zealand's community gaming model, BERL, February 2013

## Our position

NZCT opposes the proposed policy of a sinking lid on the number of machines operating in Nelson for the following reasons;

1. **The Nelson community will lose out on the funding that the lost gaming machines currently provide.**

NZCT has a policy of returning net proceeds to the communities in which they were raised – our by-line is 'Local Gaming, Local Funding'.

Currently we have three gaming venues (Malbas, Ocean Lodge and Shark Bar)<sup>2</sup> in Nelson and during the year to 31 December 2012 these pubs made it possible to fund 70 grants to local sporting organisations such as Nelson Basketball Association, Nelson Cricket Association and Nelson Bays Football Incorporated.



The Nelson Marlborough Helicopter Trust received a significant grant last year and we also funded community groups such as the Nelson Music Festival Trust, Habitat for Humanity Nelson and the Bishop Suter Art Gallery Trust.

A sinking lid policy will inevitably decrease the number of machines and the revenue they generate for community groups. Some sporting clubs and community groups may have to fold if there is not enough funding to support them.

2. **Reducing the number of machines will not reduce the number of problem gamblers.**

### Reducing machine numbers (a sinking lid) is not an effective policy

As shown in the figure below, a reduction of more than 2000 machines across the country since 2007 has had almost no impact on the small percentage of problem gamblers nationally. In the 2006/07 Ministry of Health NZ Health Survey<sup>3</sup> 0.4 per cent of the population were categorised as problem gamblers using the Canadian Problem Gambling Index, in 2009/10 it was 0.7 per cent, and in the 2011/12 survey it was 0.3 per cent of the population. The latest face-to-face survey findings are based on a sample size of 9821 adults aged 15 years and over.

<sup>2</sup> The Globe Tavern also contributed funding but is no longer with NZCT

<sup>3</sup> Problem Gambling in New Zealand, Preliminary Findings from the New Zealand Health Survey, Ministry of Health, August 2012

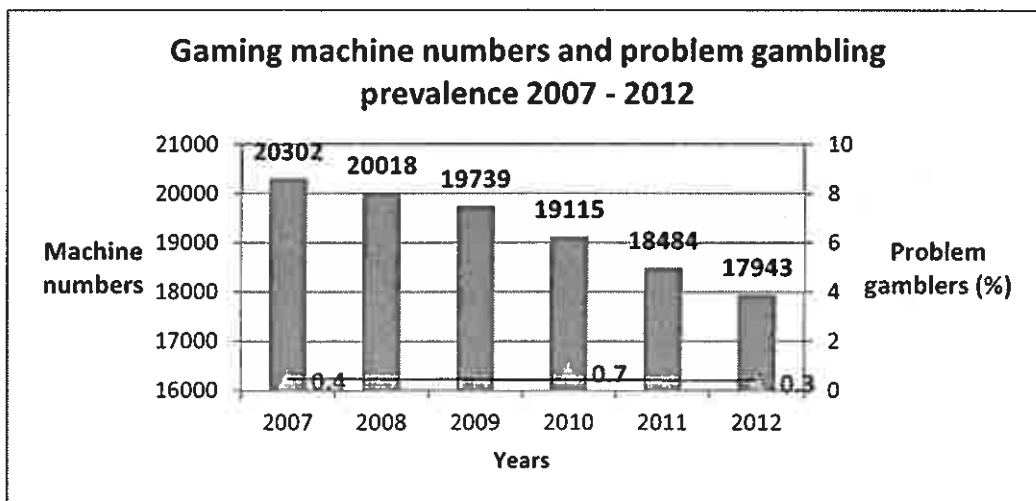
According to research by BERL, New Zealand has one of the lowest rates of problem gambling in the .

Country	Problem Gambling Prevalence (% population*)
New Zealand	0.3
UK	0.6
Canada	2.6
Norway	0.7
Australia	0.5 – 1.0
USA	2.3

\* Mixture of CPGI, PGSI and SOGS scores

The evidence is clear, relatively few New Zealanders are gambling at levels that lead to negative consequences. While there is no doubt that the damage for those who are problem gamblers is high, the reality is, the majority of Nelson residents who gamble know when to stop.

Figure 1. Gaming machine numbers versus prevalence of problem gambling in New Zealand <sup>4 5</sup>



The latest Department of Internal Affairs gaming statistics show that there are currently 257 gaming machines operating in the Nelson City region, which is 32 fewer machines than in March 2007. Nelson City also has five less gaming venues (now 19 pubs) than in 2007.

<sup>1</sup> Maximising the benefits to communities from New Zealand’s community gaming model, BERL, February 2013

<sup>3</sup> Intervention Client Data, Service User Data, Problem Gambling, Ministry of Health website, 2013

<sup>4</sup> Gaming statistics, Department of Internal Affairs website, 2013

<sup>5</sup> Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Nelson City, Gambling & Addictions Research Centre, AUT University, 2012

The number of problem gamblers seeking assistance has remained at relatively low levels during this time. Seventy eight people sought help from Problem Gambling service providers in 2007 and 132 sought help in 2011<sup>3</sup>. Unfortunately reducing machine numbers is not an effective strategy for reducing problem gambling. It is as effective as reducing the number of bars for alcoholics. As long as there are still bars around, an addict will find them.

#### Reducing machine proximity may be more effective

Research by Auckland University of Technology (AUT)<sup>6</sup> 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. A relocation clause, which allows machines to be relocated away from high risk areas where the machines are closer to problem gamblers' homes, may be a more effective policy tool. A relocation clause can also be used in circumstances where a venue is required to establish at a new site. These circumstances could include damage from fire, flood or earthquake or site redevelopment.

#### Nelson City machine density

Nelson City's current Class 4 gaming machine density of 5.9 machines per thousand people is slightly higher than the rest of New Zealand (4.5).

**Table 1. Countries with significant gaming machine market share ranked by machines per 1,000 people (2010)<sup>1</sup>**

Country	World Market Share	Gaming machines	Population (millions)	Machines per 1,000 people
Japan	63.6%	4,590,246	126.8	36.2
Macau	0.2%	14,491	0.6	25.6
Netherlands	0.5%	38,155	1.7	22.7
Australia	2.8%	200,057	21.5	9.3
Czech Republic	0.9%	63,641	10.2	6.2
Italy	4.6%	330,000	58.1	5.7
Spain	3.4%	246,651	46.5	5.3
Denmark	0.4%	27,150	5.5	4.9
<b>New Zealand</b>	<b>0.3%</b>	<b>18,944</b>	<b>4.3</b>	<b>4.5</b>
United Kingdom	3.4%	248,000	62.3	4.0
Canada	1.3%	92,266	33.8	2.7
Romania	0.8%	59,814	22.0	2.7
Germany	2.9%	212,000	82.3	2.6
United States	10.4%	751,520	310.2	2.4
Poland	0.8%	55,000	38.5	1.4
Norway	0.4%	2,773	4.7	0.6
Argentina	0.3%	19,040	41.3	0.5
South Africa	0.3%	22,460	49.1	0.5
Singapore	0.0%	2,000	4.7	0.4
Sweden	0.0%	1,500	9.1	0.2
				Source: TNS (2011)

<sup>1</sup>Maximising the benefits to communities from New Zealand's community gaming model, BERL, February 2013

The number of machines per person provides a rough indicator of the general accessibility of gaming machines. New Zealand sits towards the middle of the pack in the table above, at 4.5 machines per 1,000 people, similar to Denmark and the United Kingdom, but at half the level of Australia (at 9.3 machines per 1,000 people) <sup>1</sup>.

**3. The number of problem gamblers seeking help in Nelson is the same as the national average and the social cost of problem gambling is a fraction of that caused by tobacco, alcohol and drugs.**

**The vast majority of Nelson City residents gamble responsibly**

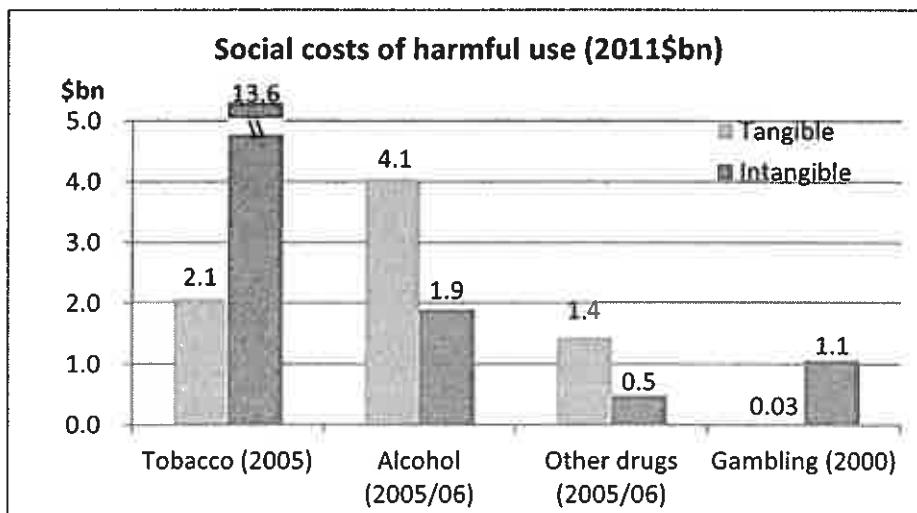
The latest available statistics from the Ministry of Health (MoH) show that during 2011, 132 people (2.9 per thousand) in the Nelson City region sought help for problem gambling <sup>3</sup>. The national average for people seeking help is also 2.9 problem gamblers per thousand people.

The Health Sponsorship Council 2010 Health and Lifestyles Survey found that 16 per cent of New Zealanders play the pokies. In terms of actual numbers across Nelson, this means around 7,200 of your residents are recreational pokie players.

**The social cost of problem gambling is only a fraction of other social ‘harms’**

The estimated social cost of problem gambling in New Zealand, while significant to the families involved, is just 1-2 per cent of the social cost of alcohol, tobacco and other drugs<sup>1</sup>. Figure 2 below shows the estimated social costs of harmful use of tobacco, alcohol, other drugs and gambling.

**Figure 2. Social costs of harmful use: tobacco, alcohol, other drugs and gambling <sup>1</sup>**



(Note: as the estimated intangible cost of tobacco was \$13.6 billion, which dwarfs the other categories, the scale is truncated at \$5.0 billion for ease of viewing<sup>1</sup>).

<sup>3</sup> Intervention Client Data, Service User Data, Problem Gambling, Ministry of Health website, 2013

<sup>1</sup> Maximising the benefits to communities from New Zealand’s community gaming model, BERL, February 2013

Although the social costs of problem gambling should not be trivialised, the policy formulated to address this issue should be tempered in light of the magnitude to other products where there is harmful use<sup>1</sup>.

#### **Australian data should not be used for New Zealand**

Contrary to statements made by the Problem Gambling Foundation (PGF), there is no evidence available that suggests that problem gamblers in New Zealand account for 40 per cent of all gambling expenditure. There is currently no New Zealand data available to support this claim. The figure used by PGF has come from a 2010 Australian Productivity Commission report. The Australian gambling environment is very different to New Zealand, with the density of gaming machines more than double (see Table 1 above), and the gambling spend per capita nearly double (see Figure 3 below). Consequently, the New Zealand percentage of gambling expenditure by problem gamblers is likely to be far lower than in Australia.

Given that problem gambling appears to affect relatively few of Nelson's pokie players, and that the tangible costs of problem gambling are a fraction of the other 'social harms', we wonder why such a blunt instrument as a sinking lid policy is being considered? Councillors may be interested to know that earlier this year several other Councils (e.g. Ruapehu, Rangitikei, and Western Bay of Plenty) who were proposing to introduce sinking lids have actually chosen not to, after reviewing the evidence.

The councils shown in the table below represent a range of policies, population sizes, and problem gambling ratios and provide a good comparison with Nelson gaming statistics.

**Table 2. Comparison of national gaming statistics across different councils (2011)**

Council	Policy	Population	Machines	Machines / 1000 people	Problem gamblers	Problem gamblers /1000 people
Rotorua	Cap	70,400	416	5.9	365	5.2
Kawerau	Sinking lid	6,750	72	10.7	103	15.4
Nelson	Cap	45,000	257	5.9	132	2.9
Dunedin	Open	98,000	559	5.7	275	2.8
Wellington	Floating Cap	180,000	780	4.3	385	2.1
Christchurch	Sinking lid	348,000	1770	5.1	1363	3.9
<b>New Zealand</b>		<b>4,116,900</b>	<b>18,994</b>	<b>4.5</b>	<b>12,248</b>	<b>2.9</b>

#### **4. Robust systems and significant funding are in place to support problem gamblers**

As a corporate society licensed to conduct class 4 gambling, NZCT is fully aware of its obligations under the Gambling Act 2003 to prevent and minimise the harm which can be caused by gambling, including problem gambling. NZCT takes these obligations very seriously.

<sup>3</sup> Intervention Client Data, Service User Data, Problem Gambling, Ministry of Health website, 2013

<sup>4</sup> Gaming statistics, Department of Internal Affairs website, 2013

We provide significant funding to the Ministry of Health through an annual levy (\$1.5 million in 2012). This funding assists Nelson City's problem gambling support providers in Vanguard St (Te Kahui Hauora o Ngati Koata Trust) and Pascoe St (Problem Gambling Foundation).

NZCT provides a problem gambling resource kit to each of its gaming venues. The kit includes:

- NZCT's harm prevention and minimisation policy
- exclusion orders and guidance on the exclusion order process
- a harm minimisation incident register to record any problem gambling issues and action taken by staff, and
- problem gambling pamphlets for distribution.



### Training

NZCT provides problem gambling training to staff at each of its gaming venues. Trainers deliver a presentation on problem gambling and take staff members through each part of the problem gambling resource kit in detail. Refresher training is also provided at regular intervals. Gaming venues are continually reminded of their obligation to ensure a person trained in harm minimisation is on duty. We do this via our gaming venue operator newsletter and our regional managers during their regular visits to gaming venues.



### Signage

In addition to the problem gambling resource kit, NZCT also provides all its gaming venues with signs to display in and around the gaming area.

### Online gamblers have no support systems

Imposing restrictions on gaming machines and gaming venues may actually drive gamblers away from the controlled environment of gaming lounges, to the uncontrolled environment of online gambling. Online gambling is growing at a rapid rate.

In the United Kingdom about the same proportion of gamblers play slot machines online, as those who play in person<sup>7</sup>. Unfortunately the NZ Health Survey does not cover online gambling, but we can probably assume the numbers are not too different to the UK. Not only is there no help available for online gamblers, but the money gambled does not return any funds to the community or to the government.

This is a major concern for the pub gaming sector and should also be a concern for the Council. The unintended consequence of a sinking lid may actually be an increase in online problem gambling.

### Exciting new harm minimisation tool currently in trial phase

NZCT is proud to be associated with the trial of a potentially ground breaking tool in harm minimisation. Using the facial recognition software found at international airports, a Hamilton company has developed a version that will cause a gaming machine to stop playing if it recognises a problem gambler that has requested to be excluded. This software could be available in 12 to 18 months, and will be far more effective for reducing harm than a sinking lid policy.

<sup>7</sup> British Gambling Prevalence Survey 2010, the Gambling Commission

5. Pokie playing can only be played in a controlled environment and is a valid entertainment choice for residents who play responsibly. It is also an important component of the local hospitality sector

**Personal choice to gamble**

We recognise that Nelson City Council aims, through its Long Term Plan, to balance the needs of visitors and residents while achieving economic development. We support this objective and believe a vibrant hospitality sector is a key component to achieving both economic development and a variety of tourism choices. ‘Pokie-playing’ is a valid and enjoyable source of entertainment for residents and tourists alike, as long as the games are played responsibly.

Most pokie players, like Lotto players, do so to ‘have a little thrill’. They regard it as light entertainment, and the majority of players in Nelson City know when to stop.

**Pokie expenditure is directly related to disposable income <sup>1</sup>**

The figure below from BERL shows that gambling expenditure tends to increase with income. The expenditure per person in New Zealand sits slightly above many of the European countries examined and broadly in line with Finland and the UK (marked by the purple dots), but well below Australia. Australian pokie players tend to spend far more per person than New Zealand pokie players.

**Figure 3: Gambling spend and income: Europe and Australasia <sup>1</sup>**

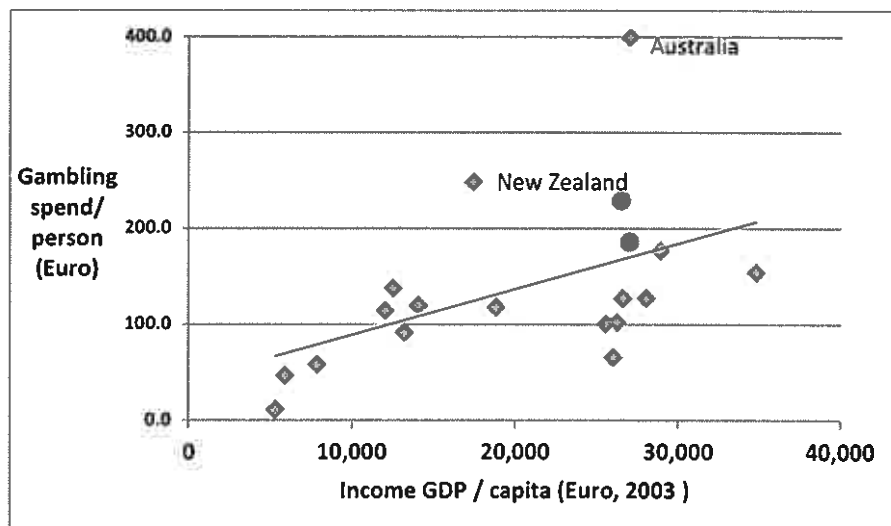
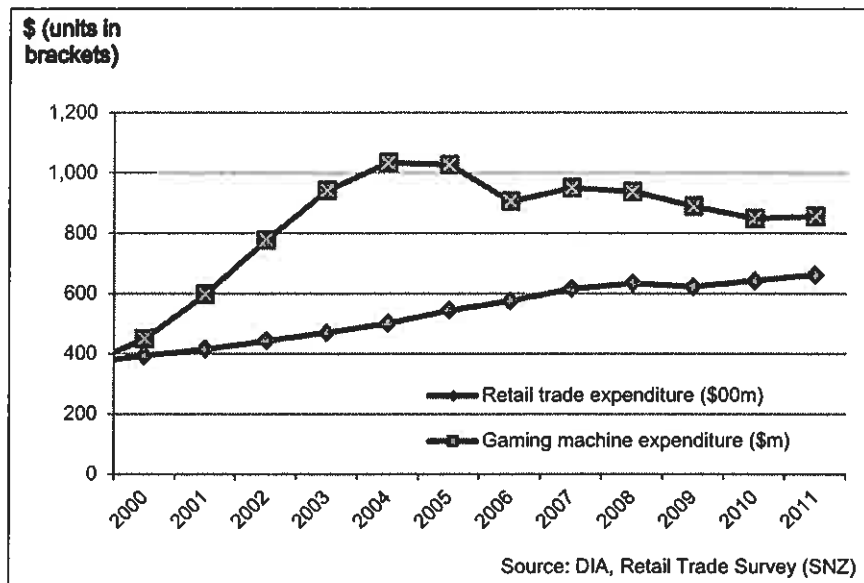


Figure 3 shows that as discretionary income increases so does gambling expenditure, and as disposable income reduces, so does gambling expenditure. Figure 4 below illustrates the same point by charting New Zealand retail expenditure since 2001 alongside gaming expenditure.

<sup>1</sup>Maximising the benefits to communities from New Zealand’s Community Gaming Model, BERL, February 2013



Figure 4. Gaming spend and retail expenditure <sup>1</sup>

As discretionary income has increased, so has retail expenditure and gaming expenditure. The gaming industry reforms around 2003 are reflected by the downturn in expenditure thereafter, but overall the trend for gaming spend is the same as retail spend.

#### Pokie players are typical New Zealanders

A survey of pokie players undertaken in 2005 by the Department of Internal Affairs shows that they are a diverse group of people, and that they are not from low income or minority ethnic backgrounds as is commonly portrayed. The personal characteristics of pokie players in New Zealand in 2005 are shown in the table below. In almost all respects, they reflect the same characteristics as the general population, except for ethnic background and education levels.

The age spread of pokie players is similar to the general population, except there are lower proportions of <24 year olds, since people under 18 years old are not allowed to play. There are slightly higher proportions of 25-44 year olds (41 per cent of participants versus 28 per cent of the general population are aged between 25 and 44 years).

The ethnic background of players is represented by slightly higher numbers of Maori (21 per cent) than in the general population (14 per cent). The perception that only people with low incomes play pokies is dispelled by the statistics for the general population which show there are lower levels of pokie players with incomes under \$20,000 (37 per cent) than in the general population (43 per cent).

The percentage of unemployed and non-labour force that play pokies (36 per cent) is roughly the same as in the general population (34 per cent). Also interesting is the education level of pokie players, which appears to be higher than that of the general population (43 per cent with a tertiary qualification, versus only 22 per cent of the general population).

<sup>1</sup>Maximising the benefits to communities from New Zealand's Community Gaming Model, BERL, February 2013

Table 3: Personal characteristics of non-casino gaming machine participants <sup>6</sup>

Characteristic	Category	Pokie players (%)	General population 2006 census (%)
<b>Age</b>	<24 years	21	35
	25-44 years	41	28
	45-64 years	27	24
	>65 years	10	12
<b>Ethnicity</b>	Maori	21	15
	Pacific	5	7
	Asian	<1	9
	General	73	68
<b>Personal income</b>	<\$20,000	37	43
	\$20-40,000	31	30
	>\$40,000	32	27
<b>Occupation</b>	Unemployed/non labour force	36	34
	Employed	64	66
<b>Highest qualification</b>	Non-tertiary	57	78
	Tertiary	43	22

Most pokie players in Nelson City are typical New Zealanders, they have a legal right to gamble, and pub gaming is conducted in a highly controlled environment. Why would the Council want to reduce the availability of a legitimate form of entertainment for more than 7,000 responsible residents?

<sup>6</sup>People's participation in, and attitudes to gambling 1985-2005, Department of Internal Affairs, 2005

## Recommendation

We realise that Nelson City Council wants to implement a fair and balanced policy that takes account of both the good and the harm associated with Class 4 gambling. However, far more people in the region will be affected negatively rather than positively if the Council introduces a sinking lid policy.

The end result of a sinking lid policy is likely to be many anxious community organisations and their members, who face even more uncertainty about their future funding. It may also cause deterioration in the quality of existing gaming venues because landlords would know they have 'captive' tenants (and therefore no incentive to upgrade their buildings).

In addition, your 7,000 recreational pokie players may feel their Council is treating them as if they were all problem gamblers. Finally, there is likely to be absolutely no change in problem gambling statistics.

Our recommendation is to cap machine numbers at the current level (257).

It is likely that machine numbers will continue to fall, even with a cap, as the national trend has been a decline of 2-3 per cent per annum for many years. However publicans operating gaming machines will have slightly more flexibility to move to better venues in lower risk areas, due to any margin that may open up under the cap, and community organisations will be reassured that their funding is slightly more protected.

## NZCT Nelson City Grants

In the year to December 2012, NZCT distributed \$614,520 to 70 sporting and community groups in the city and also funded a host of national organisations that benefit Nelson.

Organisation	Purpose	Amount
Ashton Kilties Marching Team	Towards airfares to attend NZ Marching Championships	\$2,000
Ashton Senior Marching Team	Towards van hire for NZ Champs in Hamilton	\$900
Athletic College Old Boys Cricket Club	Towards playing equipment	\$3,000
Athletics Nelson Inc	Towards accommodation to attend NZ Cross Country Championships	\$1,500
Baseline Basketball Club Inc	Towards stadium hire, travel and accommodation, coaching, plus salary of Head Coach and Administrator	\$40,000
Bishop Suter Art Gallery Trust	Towards purchase a sound system	\$4,000
City of Nelson Highland Pipe Band	Towards snare drums, bass drums and harnesses	\$10,000
Excelsior Under 12's Marching	Towards accommodation to attend South Island Championships	\$1,000
Futures Positive Beginnings	Towards upgrade of playground equipment	\$2,000
Glen Hira Rural Fire Force	Towards a new portable pump	\$4,800
Golden Downs Golf Club Inc.	Towards installation of water pump and timer system	\$1,500
Habitat for Humanity Nelson	Towards bathroom and laundry fittings for a new house currently being built	\$2,000
Jacks Netball Club	Towards indoor venue hire	\$2,500
Manuka Community House	Towards equipment and covering of foam squabs	\$1,000
National Academy of Distance Running	Towards office rental and secretarial services	\$3,000
Nayland College Board of Trustees	Towards van hire, airfares and accommodation for senior netball team to attend Secondary School Championships	\$2,000
Nayland College Board of Trustees	Towards airfares for boys basketball competing in South Island Secondary Schools tournament in Dunedin	\$3,500
Neighbourhood Support Nelson Inc	Salary and operating costs for Neighbours Day	\$2,000

Nelson Badminton Assn Inc	Towards accommodation, vehicle hire and airfares for U15 and U17 rep team to attend tournaments	\$3,000
Nelson Basketball Assn Inc	Towards salary of Executive Officer	\$9,000
Nelson Basketball Assn Inc	Towards airfares, accommodation and vehicle hire for Womens National League tournament	\$3,000
Nelson Basketball Assn Inc	Towards travel and accommodation for U13 & 15 teams to attend National Championships	\$5,000
Nelson Basketball Assn Inc	Towards salary of Operations and Development Officer	\$6,000
Nelson Bays Football Inc.	Towards salaries of General Manager and Administration Assistant from October 2012	\$15,000
Nelson Bays Squash Inc	Towards salary of Squash Development Officer	\$6,000
Nelson Bays Tennis Assn	Towards coaching for juniors	\$2,000
Nelson Budget Service Inc	Towards upgrade and streamlining of IT equipment	\$3,500
Nelson College	Towards vehicle hire, ferry travel and accommodation to attend National Secondary Schools Championships	\$3,000
Nelson College	Towards building of a new Trades Centre at the College	\$50,000
Nelson College	Towards travel and accommodation for BBNZ Secondary School Championships	\$2,500
Nelson College for Girls	Towards accommodation and ferry travel to attend Volleyball Championships	\$3,000
Nelson College for Girls	Towards travel and accommodation to National Football tournament	\$3,000
Nelson College for Girls	Towards van hire, airfares and accommodation for touch team in Hamilton	\$3,000
Nelson Cricket Assn Inc	Towards salary of General Manager and Operations Manager	\$40,000
Nelson Cricket Assn Inc	Towards salaries of General Manager and Community Cricket Coordinator	\$40,000
Nelson Hockey Assn (1993) Inc	Towards salaries of Executive Officer and Regional Development Officer	\$20,000
Nelson Marine Radio Assn Inc	Towards upgrade of radios and equipment	\$2,600
Nelson Marist Rugby Football Club	Towards flights, accommodation and van hire to travel to Spillane Cup in New Plymouth	\$3,000
Nelson Marlborough Rescue Helicopter Trust Inc	Towards standing fees and purchase of forwards looking infra red	\$100,000
Nelson Motorcycle Club Inc	Towards first aid cover for Nelson Mini MX Champs	\$800

Nelson Music Festival Trust	Towards costs of staging Festival	\$5,000
Nelson Netball Centre Inc	Towards salary of Development Manager	\$10,000
Nelson Rowing Club	Towards salary of Head Coach	\$20,000
Nelson Rowing Club	Towards salary of Head Coach	\$10,000
Nelson Softball Assn	Towards salary of CEO/Development Officer	\$21,500
Nelson Softball Assn	Towards travel and accommodation for U15 boys to Dunedin	\$6,000
Nelson Speedway Assn Inc	Towards travel and accommodation to attend inaugural teams race challenge	\$3,000
Nelson Squash Rackets Club Inc	Towards Club Development Manager	\$4,000
Nelson United Softball Club	Towards match balls	\$1,500
Nelson City Underwater Hockey Club Inc	Towards togs and caps	\$2,500
Netball Tasman Inc	Towards airfares and accommodation to attend NZ Netball Championships	\$5,000
Order of St John Nelson	Towards ambulance	\$15,000
Softball Mainland Inc	Towards airfares for Mens and Women's team for National Championships	\$6,000
Special Olympics Nelson	Towards venue hire for Regional Games	\$3,200
Suburban Netball Club	Towards uniforms and training venue hire	\$3,000
Suburbs A F C	Towards playing uniforms and coaching	\$14,000
Suburbs A F C	Towards salaries of Director of Football and junior coaching,	\$2,400
Suburbs A F C	Towards equipment, medical and administration services for Summer Soccer	\$4,000
Tahunanui Bowling Club Inc	Towards payment of Greenkeeper	\$2,000
Tasman Regional Sports Trust	Towards various costs associated with Nelson Sports Awards	\$15,000
Tasman Rugby Union Inc	Towards salary of Rugby Operations Manager from October 2012	\$24,000
United Bowling Club	Towards van hire and accommodation to travel to Regional Interclub Playoffs	\$1,720

United Bowling Club	Towards costs of greens maintenance	\$2,000
United Bowling Club	Towards stacker chairs	\$1,400
Upper South Island Softball Inc	Towards travel and accommodation for representative teams to Hamilton and Hastings	\$5,000
Wakatu Cricket Club Inc	Towards coaching	\$3,000
Wakatu Cricket Club Inc	Towards ground fees	\$2,200
Wanderers Rugby Football Club Inc	Towards jerseys, shorts, socks and balls	\$4,000
Wanderers Rugby Football Club Inc	Towards first aid, equipment, playing uniform, balls for league teams, holders and wet weather gear, plus bus travel	\$3,000
Wanderers Rugby Football Club Inc	Towards one day playing uniforms for cricket and ground fees	\$5,000
		<b>\$614,520</b>

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

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Community Gaming Association Inc

*Raising money for our communities*

**Submission from Community Gaming Association  
in response for input to proposed  
Nelson City Council  
Class 4 Gambling Policy Review**

**EXECUTIVE SUMMARY**

Community Gaming Association (CGA) would be delighted if an increase to the cap on machines and venues was a realistic proposal and while we believe that this would benefit the local community, understand that submissions from some pressure groups will ensure that this is not an option.

It is therefore our considered opinion that a capped number relating to gaming machines of 201 which is a lift from the 173 gaming machines operating currently is the most appropriate method of addressing gambling issues facing Council.

We do not believe a sinking lid policy as referred to in your Draft Class 4 Gambling and Racing Board Venue Policy – Statement of Proposal will achieve what some submitters believe is appropriate and in fact the outcome of unintended consequences becomes a real issue.

However, the capped option comes with a strong recommendation that gaming licenses are transferable. Transferability will allow existing levels of community funding to continue. It will also allow the removal of gaming machines (pokies) from one area to another which addresses the view that lowering the number of machines in lower socio-economic areas (and we strongly contest this misconception) can be achieved without the subsequent reduction in machine numbers and resulting drop in funding.

Given that the Flavell Bill, due for its second reading has the proviso that at least 80% of funding must be returned to the local community then moving gaming machines away from selected areas will have the effect of reducing funding to those areas.

- Class 4 gaming returns \$360m annually to local communities. Millions of people throughout our country benefit from the availability of those funds.



- It returns around \$360m to Government in the form of Duty and GST.
- Class 4 gaming funds the Problem Gambling Foundation (PGF).
- Conversely Casinos in Auckland and other centres return less than 2.5% (of profit, not turnover) to communities.
- If the funding Class 4 gaming makes within communities is reduced or removed, who or what is going to fill that void?
- Is Council going to underwrite community activities now funded through Class 4 gaming?

Gaming in New Zealand is viewed world wide as a tremendous example of gaming and communities working hand in hand. New Zealand's system of using funds generated through gaming to fund community activity is recognised as being innovative. Gambling is going to happen regardless of whether there is a proportion of returns going to the community or not. The designers of New Zealand's system have been far-sighted in developing a system that diverts funds to the community.

Whilst appreciating Council has a difficult path to tread in this area in trying to appease all parties, it needs to be noted that actions that undo this innovative system could become an example of unintended consequences that reduce community funding and harm society when the intent was to improve it.

To assist your own Council with some comparisons in the matter of gambling and TAB venue policies; in preparing for its own consultation process, Auckland Council commissioned a community funding survey. The survey data is summarised in the report *Community Funding: A Focus on Gaming Grants* dated 4 September 2012. The report confirms how essential gaming machine funding is to a very large number of Auckland community organisations and how extremely difficult it would be for such funding to be obtained from alternative sources. The key findings of the survey are:

- In 2011 over \$90m was distributed to Auckland based community organisations for authorised purposes.
- One-third of the respondents (33%) considered gaming trusts to be a major source of funding, with a further 37% indicating that they were a moderate funding source.
- Most respondents (75%) indicated that their organisation is moderately or totally reliant on this source to fund core business.
- Most respondents (55%) believed that there would be a high to extreme risk to their organisation and their core business if they did not receive gaming funding. A further one quarter (26%) said that there would be a moderate risk if they did not receive it.

- Two-thirds of respondents (68%) said that they thought that they would be unlikely to find another source of funding if gaming funding was not available.

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

Council staff also commissioned an economic impact report. The Economic Impact Report dated 10 August 2012 confirmed that the non-casino electronic machine sector is making a positive economic contribution in Auckland. The report at page 22 concluded: Overall, the non-casino gaming machine industry (NCEGM) has a positive economic impact on the Auckland economy. This assessment suggests that the social dividend, funded out of GMP, is largely responsible for any positive impact the NCEGM Industry. Any policy regarding changes to the NCEGM Industry need to carefully assess the impacts it will have in order to maximise what is the best outcome for society because community, sport, heritage and other community projects are funded by the social dividend.

There is some middle ground in this debate and we would like to think that emotion will be put to the side, that unshakable facts speak for themselves and that a rational approach to accommodating the needs of the 97% of the population who gamble in a responsible manner are not marginalised. It is not unreasonable for the majority of the population to feel slighted by suggesting they are not capable of making informed decisions on gambling and that they are in some way in need of Council intervention.

The nub of the matter is that communities have built tremendous facilities, developed sporting organisations and allowed them to thrive. We are major contributors to art/culture as well as working within schools, all of this as a result of the association with Class 4 gaming.

We want to see legacy funding continue and to ensure this is achieved we need Council to take a lighthouse approach and be recognised for bringing an even hand to the process.

We believe that the same drivers and information contained in the report Auckland Council commissioned can equally apply in the Nelson City Council deliberations, other than scale, this base of information is replicated throughout the country. I am not trying to suggest that the two areas are exactly the same however in the matter of Class 4 gaming the similarities will be pronounced.

## OVERVIEW AND BACKGROUND INFORMATION FOR COUNCIL

- CGA represents community and regionally based fundraising organisations that operate gaming machines and are licensed by the Department of Internal Affairs (DIA).
- CGA supports the basis on which gaming was permitted to operate within New Zealand, and that is to raise funds for local communities, for the benefit of those communities.
- CGA is opposed to a sinking lid policy on gaming as the direct result of this is a reduction in funding for community organisations that rely on this for fundraising to provide support within their local community. There is no solid evidence that sinking lid policies deliver measurable outcomes for the community/individuals or lower harm minimisation issues.
- CGA also understand and appreciate that there is a balance to be achieved in Council deliberations to ensure all parties are seen and heard via submissions; however there is a great deal of emotive and ill informed commentary regarding the impact of gaming machines and we contend that there is far more good achieved within communities as opposed to the very small percentage of the population that have an issue with their operation.

New Zealand has a low problem gambling rate. At the New Zealand Gaming Expo Conference in March 2006, Professor Max Abbott presented a comparison of New Zealand's problem gambling rates. The comparison showed the results of several countries when the same consistent screen had been applied. The following table was shown by Professor Abbott:

Comparing National Problem Gambling Prevalence Rates Jurisdiction	Year	SOGS-PY = 5+
Norway	2002	0.2%
New Zealand	1999	0.5%
Sweden	1999	0.6%
Great Britain	2000	0.8%
Spain	1996	1.4%
United States	2000	1.9%
Australia	1999	2.3%

More recent surveys have confirmed the low problem gambling rate. The 2012 New Zealand Health Survey found the problem gambling rate was 0.3% (PGSI screen).

The problem gambling levy is struck on a three-yearly cycle, with the current levy covering the period 1 July 2010 – 30 June 2013, as per the table below.

**Problem Gambling Services – Proposed Ministry of Health Spend 2010–2013 (GST exclusive) Services**

	2010/11 (\$)	2011/12 (\$)	2012/13 (\$)	Total
Public health services*	6,757,795	7,090,551	6,965,362	20,813,708
Intervention services*	8,413,180	8,549,343	8,563,730	25,526,253
Research contracts	2,499,073	2,224,073	1,423,000	6,146,146
Ministry operating costs	957,044	978,617	1,000,839	2,936,500
<b>Total</b>	<b>18,627,092</b>	<b>18,842,584</b>	<b>17,952,931</b>	<b>55,422,607</b>

DIA surveys have continued to show that a very high proportion of Class 4 gaming venues are effectively managing their harm minimisation responsibilities and the PGF, through the Ministry of Health, receives significant funding which is ring fenced for the treatment of those who have clinically proven issues with gaming. Last year from Class 4 gaming alone some \$12.8m was our contribution to this organisation, a total of \$18.5m from the Industry and surveys continue to show that there is no significant increase in problem gambling statistics; this presupposes that treatment is going to genuine cases.

There is a compelling case that allowing new operations to open with gaming machines can increase the flow of funds back to communities as well as providing employment opportunities within the hospitality industry and the resulting tax increase.

### **GAMING INFORMATION**

There are a number of points we would like to make in support of our submission as follows:

- The gaming industry does not want to see an increase in gamblers with addictive behaviours and works hard to reduce these numbers.
- We would argue that it is better to have more players spend less than one individual spend more, so education and assistance is our goal.
- In recognition of this, gaming has seen a reduction in machines from 18 to 9, a maximum \$1,000 win on jackpots and a maximum stake bet of \$2.50.
- We also have PIDS, a player interruption program that automatically brings up player information on screen advising players of spend, wins, losses so there is ample support in keeping players advised of their current playing statistics.

- Venues are also required to have gaming information pamphlets and problem gaming information freely available.
- There is no jackpot advertising permissible that can be seen from the footpath as opposed to Lotto who are televised into homes throughout the country every week as well as being able to advertise enormous jackpot wins in supermarkets, dairies and the like.
- Lotto has now conceded that their rates of referrals as a consequence of super jackpots has increased and this was reflected in the recent recommendations from the Gambling Commission to the Ministry of Health that contribution rates to problem gambling levies from Lotto needed to increase in respect of these referrals.
- All hotel venue staff are trained and can exclude players who admit to having a problem.
- No ATMs are allowed in gaming rooms.
- Problem gamblers have proven to be very mobile and they simply migrate from one location to another so lowering machine numbers does nothing to change this behaviour. We have information that states that gamblers will drive up to 100kms to another gaming venue so the sinking lid process simply exacerbates the situation.

It is worth noting that should additional barriers to access and playing be implemented players will simply find alternate opportunities far less controlled to wager on.

There is a great deal of misinformation regarding gaming and I have added below how the split is actually achieved, the second tranche of figures is showing how the Industry has been declining, with the subsequent reduction in community funding.

- Pay 20% in Gaming Duty calculated on the monthly GMP of the gaming trust.
- Pay 15% GST on the total GMP of the gaming trust.
- Pay 1.48% of the GMP of the gaming trust plus GST to PGF = \$12.8m last year from Class 4 gaming, this total does not include Casinos' contribution.
- A cap of 16% on GST exclusive revenue as to what we can pay in venue payments as a gaming trust, venue costs are individually governed by the DIA.
- We must return at least 37.12% to communities of GST exclusive GMP.

- We must maximise the return to communities by restricting our operating costs to Actual, Reasonable, and Necessary (ARN).
- In addition we must pay licensing fees to the DIA, which accounts for approximately an additional 1% of GMP.

The emphasis is maximising the returns to the community whilst minimising the operating costs of gaming trusts. It is a heavily regulated and audited industry and licenses are only issued on being compliant and approved by the DIA.

Some other figures you might find interesting as follows:

- Quarterly turnover from gaming machines in Dec 2007 was \$245.3m.
- Quarterly turnover from gaming machines in Sept 2012 was \$212.9m
- In the fourth quarter of 2011 revenue was down by \$1m in Sep, compared to the previous Sep.
- Venues operating in Dec 2003 were 2,031.
- Venues operating in Dec 2011 were 1,410.
- Machines operating at Dec 2000 were approx 26,000.
- Machines operating at 31 Dec 2007 were 20,182.
- Machines operating at 31 Dec 2011 were 18,133.
- Machines operating at 30 Sep 2012 were 17,827.
- Machines operating at 2 April 2013 are now down to 17,537.
- Gaming machine revenue has declined by 1.9% or \$16.7m year ended Sep 2012.

And as at 1 May 2013 the following information was released by the DIA.

- Gaming expenditure in the country's 1,367 pubs and clubs dropped 4% in the year to March, and 10% on the last quarter of 2012.
- The figures, released by the DIA, also show there were fewer licence holders, gambling venues and gaming machines at the end of March compared with 12 months earlier.
- Licence holder numbers fell from 359 to 353, venue numbers dropped from 1,403 to 1,367 and the number of gaming machines from 18,001 to 17,542.

- For the 12 months ending Mar 2013, expenditure was down 4% from \$865.4m to \$828.7m, and spending dropped from \$214.6m in the fourth quarter of 2012 to \$192.7m in the first quarter of this year.
- PGF Chief Executive, Graeme Ramsey, believed the decline was largely due to growing awareness of the harm pokies caused. This is a specious comment and does this organisation little credit. .
- The amount spent on other forms of gambling was increasing, so the total amount gambled each year remained static at about \$2 billion. The implication here is that players are migrating to other forms of gambling as sinking lid policies are instituted which means they are moving away from charitable gaming to gaming that provides no community benefit, for instance internet gambling. This must be of concern to councils throughout the country as advised this reflects directly on community funding.

These figures will be further impacted when the mandatory removal of hand pay jackpots is implemented in 2015.

Between 1991 and 1999 the problem gambling rate declined considerably despite gaming machine numbers doubling and gaming machine expenditure trebling. Between 2006 and 2010 the problem rate increased, despite the number of gaming machines in New Zealand falling considerably in the same period. Between 2010 and 2012 the problem gambling rate appears to have fallen sharply, despite only a gradual decline in gaming machine numbers during the same period.

**When viewed as the whole, survey results confirm that there is no direct correlation between gaming machine numbers and addictive gambling rates.**

The reasons for an increase or decrease in problem gambling are complex and multi-faceted, not simply the direct by-product of an increase or decrease in machine numbers.

One of the major concerns is that neither governments nor Council has the funding to replace these grants and the process that is required. Whilst there are well meaning opinions from some sectors of the community, if you were to poll those organisations that have received funding they would advise that without that support many of the organisations would cease to exist as there is no facility to replace these funds. Sponsorships in these tight economic times are severely reduced and there are insufficient philanthropy-based organisations to underpin it so:

- Sports clubs that receive funding provide children outlets and involve them locally and keep them off the streets with the associated issues that stem from it. Funding from Class 4 gaming cuts right across local communities through education, health, the arts and numerous other examples and I doubt there is one member of councils throughout New

Zealand that has not experienced the good that comes from this form of gaming or at the very least knows someone that has been a grant recipient.

- Class 4 gaming licenses are a tremendous example of how gaming and communities can co-exist and remains an admired example of how it should work in the global gaming market. I have travelled to overseas jurisdictions and can tell you that we are admired for the way gaming is regulated with the community being the *raison d'être*.
- The matter of internet gaming is a growing threat that the PGF recognise as extremely dangerous due to the unregulated nature of its operation, and is not subjected to stringent checks and balances, in fact there is very little control applied on internet gaming sites.

It is worthy in the context of this deliberation to consider the following points:

- Offshore based online gambling poses considerable risks.
- Online gambling is highly accessible, being available 24 hours a day from the comfort and privacy of your home.
- Online gambling has no restrictions on bet sizes.
- Online gambling has no capacity for venue staff to observe and assist people in trouble.
- Online gambling reaches new groups of people who may be vulnerable to the medium.
- Online gambling provides no guaranteed return to player.
- Online gambling is more easily abused by minors.

If a reduction in gaming machines only redirects gamblers to offshore based internet gambling there is no harm minimisation advantage in that strategy. In addition, there are further disadvantages in the fact that no community funding is generated for New Zealanders, no tax revenue is generated for the New Zealand Government and no contributions are made via the New Zealand problem gambling levy.



**CONCLUSION**

We do not believe a sinking lid policy will provide the outcomes that some councils seeks to achieve, in fact the outcome for communities should Council pursue the sinking lid option, is laced with a flow on effect that will see community funding continue to dry up.

I cannot believe for a moment that Council sees this as being a desirable outcome.

There are less than 0.3% of registered individuals who exhibit issues surrounding gaming, this is significantly less than those with alcohol and smoking addictions and yet we still see a disproportionate control level applied to reining in gaming, at the expense of the majority of players who conduct themselves appropriately. A sinking lid approach does nothing to address these anomalies.

We have operated under the imposition of a sinking lid mentality for some nine years and there is no evidence to suggest or support that this has had any effect on gambling related referrals. The alternate views propounded by the Industry warrant serious considerations to ensure the ongoing viability of the tremendous association gaming and communities in New Zealand share is protected and not diminished to appease a commercial operators conditions.

Thank you for considering our views, as always we are prepared to answer any questions that may arise from this submission.



**Brian Corbett**  
**Executive Director**  
**Community Gaming Association**

Jackie Scrivner

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**From:** Submissions  
**Sent:** Wednesday, 3 July 2013 3:11 p.m.  
**To:** Administration Support  
**Subject:** FW: Nelson City Council-s TAB Board Venue and Class 4 Gambling Venue Policies  
**Attachments:** Submission on Nelson City Council -TAB Board Venue Policy.pdf; Submission on Nelson City Council's Gambling Venue Policy.pdf

**Categories:** Orange Category

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**From:** Janice Franks on behalf of Jarrod True [SMTP:JARROD.TRUE@HARKNESS.CO.NZ]  
**Sent:** Wednesday, July 03, 2013 3:11:04 PM  
**To:** Submissions  
**Cc:** [bruce.proudfoot@nzracingboard.co.nz](mailto:bruce.proudfoot@nzracingboard.co.nz)  
**Subject:** Nelson City Council-s TAB Board Venue and Class 4 Gambling Venue Policies  
**Auto forwarded by a Rule**

Please find attached New Zealand Racing Board's submissions on the Nelson City Council's TAB Board Venue and Class 4 Gambling Venue Policies. We wish to speak to our submissions.

**Jarrod True** | Partner | Harkness Henry, Lawyers, Private Bag 3077, Hamilton 3240 | DDI +64 7 834 6680 | Mobile +64 27 452 7763 | Fax +64 7 839 4043

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# The New Zealand Racing Board's Submission on Nelson City Council's Class 4 Gambling Venue Policy



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NEW ZEALAND  
RACING BOARD  
ESTABLISHED 1977

JWT-464501-152-36-V1:jef

The New Zealand Racing Board's Submission on the Nelson City Council's Class 4  
Gambling Venue Policy

Background

1. The New Zealand Racing Board holds a class 4 operator's licence. This licence enables it to conduct class 4 gambling at its TAB Board Venues. Approximately 30 of the 80 TAB Board Venues in New Zealand have gaming machines on-site.

Executive Summary

2. The New Zealand Racing Board opposes council's proposed sinking lid on gaming machines in Nelson City and invites council to retain the status quo cap of 285 gaming machines. If a sinking lid is adopted, the New Zealand Racing Board suggests that the policy allow for the relocation of existing class 4 gaming machine venues within the city, where such a relocation will result in the machine numbers reducing (18 machine venues would reduce to 9 machines and 9 machine venues would reduce to 8 machines) and the machines moving to a more desirable area.

Gaming Machines - Key Facts

3. Gaming machines were first introduced into New Zealand in the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, over 25 years ago.
4. In 2010, 81.4% of New Zealand residents aged 15 and over had participated in some form of gambling in the previous 12 months.<sup>1</sup> In 2010, 16% of people had played a non-casino gaming machine. This figure had reduced from 19% in 2008.<sup>2</sup>
5. New Zealand has a low problem gambling rate. At the New Zealand Gaming Expo Conference in March 2006, Professor Max Abbott presented a comparison of New

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<sup>1</sup> Gray, R 2011 *New Zealanders' Participation in Gambling: Results from the 2010 Health and Lifestyles Survey* – Health Sponsorship Council  
<sup>2</sup> Gray, R 2011 *New Zealanders' Participation in Gambling: Results from the 2010 Health and Lifestyles Survey* – Health Sponsorship Council

Zealand's problem gambling rates. The comparison showed the results of several countries when the same consistent screen had been used (the comprehensive South Oaks Gambling screen). The following table was shown by Professor Abbott:

#### Comparing National Problem Gambling Prevalence Rates

Jurisdiction	Year	SOGS-PY = 5+
Norway	2002	0.2%
New Zealand	1999	0.5%
Sweden	1999	0.6%
Great Britain	2000	0.8%
Spain	1996	1.4%
United States	2000	1.9%
Australia	1999	2.3%

Sources: Abbott & Volberg, 2000; Becoña, 1996; Lund & Norlund, 2003; Orford et al, 2003; Productivity Commission, 1999; Volberg et al, 2001; Welte et al, 2001

6. More recent surveys have confirmed the low problem gambling rate. The 2012 New Zealand Health Survey<sup>3</sup> found the problem gambling rate was 0.3% (Problem Gambling Severity Index screen).
7. The Problem Gambling Foundation offers a 24 hour, 365 day per year problem gambling helpline. Free, confidential help is available in 40 languages including: Amharic, Arabic, Assyrian, Bengali, Bosnian, Cantonese, Cook Island Maori, Croatian, Dari, Farsi, French, Gujarati, Hindi, Japanese, Khmer, Korean, Kurdish, Lao, Mandarin, Maori, Myanmar, Nepali, Niuean, Pashto, Portuguese, Punjabi, Russian, Samoan, Serbian, Sinhalese, Somali, Spanish, Taiwanese, Tamil, Thai, Tokelauan, Tongan, Tuvaluan, Ukrainian, Urdu, and Vietnamese.
8. All gaming machine societies since 2004 have been required to contribute to a problem gambling fund. This fund provides approximately \$18,500,000.00 per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring fenced and not able to be redirected to other health areas.
9. The problem gambling levy is struck on a three-yearly cycle, with the levy covering the period 1 July 2013 – 30 June 2016 being as per the table below.

<sup>3</sup> <http://www.health.govt.nz/publication/problem-gambling-new-zealand-preliminary-results-new-zealand-health-survey>

**Problem Gambling Services – Ministry of Health Budget 2013–2016 (GST exclusive)**

Services	2013/14 (\$m)	2014/15 (\$m)	2015/16 (\$m)	Total (\$m)
Public health services	6.779	6.858	6.835	20.472
Intervention services	8.330	8.550	8.420	25.300
Research and evaluation	2.630	2.125	1.875	6.630
Ministry operating costs	0.957	0.979	1.001	2.937
<b>Total</b>	<b>18.696</b>	<b>18.512</b>	<b>18.131</b>	<b>55.339</b>

New Gaming Machine Regulations

10. Class 4 gambling is highly regulated, regulation which is described by the Department of Internal Affairs as world leading. Since the current policy was first introduced the following new regulatory safeguards have been imposed:
- a. The Gambling (Harm Prevention and Minimisation) Regulations 2004;
  - b. The Gambling (Class 4 Net Proceeds) Regulations 2004;
  - c. The Gambling (Infringement Notices) Regulations 2004;
  - d. The Gambling (Infringement Notices) Amendment Regulations 2006;
  - e. The Gambling (Class 4 Bankings) Regulations 2006;
  - f. The Gambling (Fees) Regulations 2007;
  - g. The Gambling (Problem Gambling Levy) Regulations 2010; and
  - h. The Gambling (Class 4 Net Proceeds) Amendment Regulations 2011.
11. The regulations are comprehensive and include the following:
- a. A list of unsuitable and prohibited venues, e.g. sports stadiums, internet cafes, and cinemas. The Regulations provide that the primary activity of the venue must be focused on persons over 18 years of age. The types of venues permitted are accordingly limited to licensed premises, clubs, TAB agencies and massage parlours etc;
  - b. Limits on stake and prize money. 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. These limits only apply to gaming machines in pubs and clubs. Gaming machines at casinos do not have these

restrictions and offer considerably larger stakes and prizes. It is also not illegal in New Zealand to participate in internet gambling. Internet gambling stakes and prizes are unrestricted;

- c. A requirement that gaming machines have a feature that interrupts play and displays a pop up message. The pop up message informs the player of the duration of the player's session, the amount spent and the amount won or lost. The message is then displayed asking the player whether they wish to continue with their session or collect the credits;
  - d. A prohibition on the use of the word "jackpot" or any similar word in advertising and a prohibition on advertising being visible from outside a venue;
  - e. A requirement that pamphlets must be at the venue which provide information on odds and also information about the characteristics of problem gambling and how to seek advice for problem gambling;
  - f. A requirement that signage be displayed in venues which encourages players to gamble only at levels they can afford and advice on how to seek assistance for problem gambling;
  - g. A requirement that one staff member must be present at all times who has undertaken comprehensive problem gambling awareness and intervention training; and
  - h. A requirement that a minimum of 37.12% of gaming machine proceeds are distributed to the community each year.
12. Other restrictions have also been imposed since the current policy was first introduced including:
- a. In September 2004 the Department set limits on the amount of venue payments that may be paid to gaming machine venues. The limits ensure that costs are kept to a minimum and thus the proceeds available to the community are maximised;

- b. In June 2006 a new set of comprehensive Game Rules were established by the Department. The Game Rules set out in detail how gaming machines must be operated and how issues such as player disputes and machine malfunctions must be dealt with; and
- c. All gaming machine venues must be connected to an electronic monitoring system. The electronic monitoring system ensures greater accountability of gaming machine turnover.

No Need to Change the Status Quo – A More Restrictive Cap or Sinking Lid Will Not Reduce Problem Gambling

- 13. Council currently has a cap of 285 class 4 gaming machines. A more restrictive cap or sinking lid policy will not reduce problem gambling but will reduce community funding opportunities. It is submitted that such an approach is unjustified in the current environment of high regulation and naturally reducing machine numbers. It is submitted that the current cap be retained.
- 14. The number of gaming machines in New Zealand has been in steady decline since 2003. In 2003 New Zealand had 25,221 gaming machines. In March 2013 New Zealand had 17,542 gaming machines. Nelson City has also experienced a natural decline in venue numbers and machine numbers. In 2003 Nelson City had 26 venues and 333 gaming machines. Nelson City currently has 19 venues and 257 gaming machines.
- 15. There is no conclusive evidence indicating that caps or sinking lids reduce problem gambling. The New Zealand problem gambling prevalence rate over time bears no correlation to the number of gaming machines operating in New Zealand.
- 16. There are two groups of nationally representative published problem gambling studies that have used the same screening test, one group used the South Oaks Gambling Screen (SOGS-R screen) and one group used the Problem Gambling Severity Index (PGSI screen). The table below details the surveys that have been undertaken.



Survey Year	Survey Name	Screen	Problem Gambling Rate	Survey Size
1991	1991 National Prevalence Survey	SOGRS-R	1.2% people were current pathological gamblers (SOGRS-R score of 5)	3,933
1999	1999 National Prevalence Survey <sup>4</sup>	SOGRS-R	0.5% of people aged over 18 years had a SOGRS-R score of 5	6,452
2006/2007	2006/07 New Zealand Health Survey <sup>5</sup>	PGSI	0.4% people aged 15 years and over	12,488
2010	2010 Health and Lifestyles Survey <sup>6</sup>	PGSI	0.70%	1,740
2012	2011/12 New Zealand Health Survey <sup>7</sup>	PGSI	0.30%	9,821

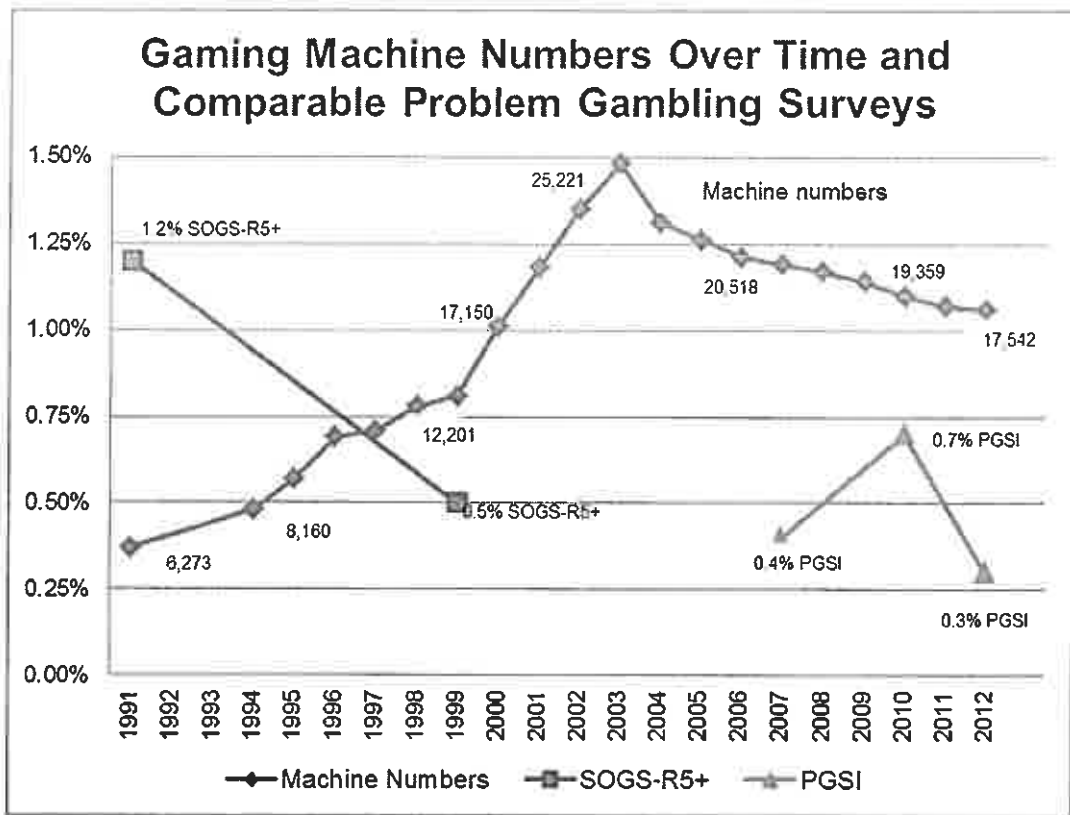
17. The graph below details the machine numbers over time and the only directly comparable published New Zealand surveys. Between 1991 and 1999 the problem gambling rate declined considerably despite gaming machine numbers doubling and gaming machine expenditure trebling. Between 2006 and 2010 the problem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

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

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

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

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



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

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

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

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

19. The proposed sinking lid policy is unlikely to reduce problem gambling but will reduce the amount of funding available to Nelson City community groups. Problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming



machines or worse move to another form of gambling such as offshore based internet and mobile phone gambling.

### Gaming Machine Funding

20. Recently, the Auckland City Council commissioned a community funding survey. The survey data is summarised in the report *Community Funding: A Focus on Gaming Grants* dated 4 September 2012.<sup>8</sup> The report confirms how essential gaming machine funding is to a very large number of community organisations and how extremely difficult it would be for such funding to be obtained from alternative sources. The key findings of the survey are:

- Most respondents (75%) indicated that their organisation is moderately or totally reliant on gaming machine funding to fund core business activities.
- Most respondents (81%) believed that there would be a moderate to high risk to their organisation and their core business if they did not receive gaming funding.
- Two-thirds of respondents (68%) said that they thought that they would be unlikely to find another source of funding if gaming funding was not available.

21. The report concluded:

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

### Positive Economic Impact From the Gaming Industry

22. Auckland City Council also recently commissioned an economic impact report on the impact of the class 4 gambling industry. The Economic Impact Report dated

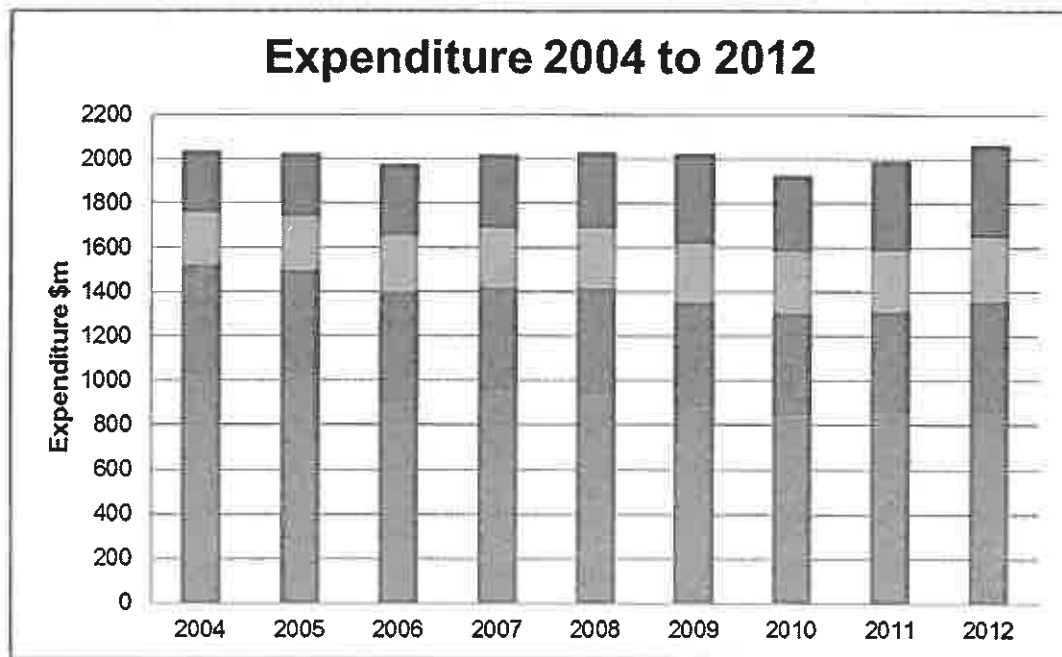
<sup>8</sup> [www.gamblinglaw.co.nz/download/Research/Auckland\\_City\\_Community\\_Funding\\_Report.pdf](http://www.gamblinglaw.co.nz/download/Research/Auckland_City_Community_Funding_Report.pdf)

10 August 2012<sup>9</sup> confirmed that the non-casino gaming machine sector makes a positive economic contribution. The report at page 22 concluded:

Overall, the non-casino gaming machine industry has a positive economic impact on the Auckland economy.

Unintended Consequences – Possible Increase in Internet and Mobile Phone Gambling

- 23. Any reduction in the gaming machine offering 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.
- 24. The graph below shows the total gambling expenditure for New Zealand from 2004 to 2012.



Year	2004	2005	2006	2007	2008	2009	2010	2011	2012
Lotteries Commission	282	280	321	331	346	404	347	404	419
Racing Board (TAB)	239	247	258	269	272	269	278	273	286
Casinos	484	472	493	469	477	465	454	461	509
Gaming Machines (outside Casinos)	1035	1027	906	950	938	889	849	856	854
<b>Total Expenditure</b>	<b>2039</b>	<b>2027</b>	<b>1977</b>	<b>2020</b>	<b>2034</b>	<b>2028</b>	<b>1928</b>	<b>2005</b>	<b>2068</b>

<sup>9</sup> [www.gamblinglaw.co.nz/download/Research/Auckland\\_City\\_Economic\\_Impacts\\_Report.pdf](http://www.gamblinglaw.co.nz/download/Research/Auckland_City_Economic_Impacts_Report.pdf)



25. The above data shows a downward trend for expenditure on non-casino gaming machines and an upward trend on the amount spent on TAB offerings and Lotteries Commission offerings. The total amount gambled from 2004 to date has remained reasonably steady. This data suggests that a reduction in gaming machine numbers reduces non-casino gaming machine expenditure, but not total gambling expenditure, i.e. it may promote a migration to other forms of gambling. Other forms of gambling have a lower return to player and a lower return to the community.
26. Traditionally overseas based online gambling has not been available to people in lower socio-economic areas due to limited access to computers, the internet and limited access to credit cards. However, this has all changed. The internet is progressively becoming a normal feature of commercial and social exchange. A Nextbook Premium Andriod 4.0 Tablet (with a 7 inch screen and wifi) can currently be purchased from the Warehouse for a mere \$149.00. Today the most basic of prepaid smart phones includes internet access and the ability to download apps. The introduction of Visa debit cards and Prezzy Cards mean that a bad credit rating is no longer a barrier to being able to spend money online or via mobile apps.
27. It now takes only a simple search and a few minutes to download to your computer, tablet or mobile phone any type of casino game your imagination desires, including an exact replica of the gaming machine programs currently available in New Zealand venues. International Gaming Technology (an international provider of pokie machines with a New Zealand presence) has produced a 58 page brochure<sup>10</sup> detailing their online and mobile offering. The catch phrase is *The Playing Field is Now Everywhere, Online and Mobile Gaming by IGT, It's a whole new game.*
28. In 2010 the number of people who had participated in internet gambling or mobile phone gambling was approximately the same total percentage as the number of people who had played table games at one of the six casinos.<sup>11</sup>
29. The Ministry of Health records the primary mode of gambling reported by new clients.<sup>12</sup> The problem gamblers who report that their primary mode of gambling is

<sup>10</sup> [http://media.igt.com/marketing/PromotionalLiterature/IGT\\_Online\\_Mobile\\_Games\\_Portfolio.pdf](http://media.igt.com/marketing/PromotionalLiterature/IGT_Online_Mobile_Games_Portfolio.pdf)

<sup>11</sup> Gray, R 2011 *New Zealanders' Participation in Gambling: Results from the 2010 Health and Lifestyles Survey* – Health Sponsorship Council.

<sup>12</sup> [http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total\\_assisted](http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted)

internet or mobile phone gambling are currently recorded in the category "other". In the 2007/2008 financial year 31 new clients were recorded as being in the other category. This amount has increased by a multiple of 10 times to 328 people in 2011/2012.

30. The Problem Gambling Foundation's Research Director, Dr Philip Townshend recently undertook a study on the harm caused by the various modes of Gambling. In Dr Townshend's 2011 paper *Quantifying the Harms of Internet Gambling Relative to Other Gambling Products*<sup>13</sup>, he described offshore based internet gambling as the most harmful mode of gambling and the new *crack cocaine of gambling*.
31. On 7 October 2011 the Nelson Mail printed the following article:

**Internet Gambling seen as 'threat'**

Gambling has been on the rise again in Nelson and internet gambling is having more of a worrying impact, says an addiction specialist.

Nelson research director for the Problem Gambling Foundation, Philip Townshend, said the last few months had been quite a "busy period" for gambling in the region.

The foundation was also starting to see more internet gambling which was concerning, he said.

Research by Dr Townshend last year showed that while there were a much smaller number of internet gamblers, they were much more likely to need treatment for addiction compared with other gamblers.

"So although a lot less people use the internet [to gamble], it seems from the data it's a much more dangerous product."

He said it was likely more people would take up internet gambling.

Unlike in real life, where the most you can bet on a pokie machine is \$2.50 per spin, on the internet you could spend \$100 per spin, he said.

"A hundred dollars every three seconds ... that's serious money going down the tube."

The internet offered both the "best and the worst" in terms of a gambling environment, he said.

"You can have the best host responsibility because there's so much information about a person's gambling patterns, but because its also a highly unregulated environment, you can get the worst of ethics".

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<sup>13</sup> [www.gamblinglaw.co.nz/research/Relative\\_Gambling\\_Harms\\_Townshend\\_2011.pdf](http://www.gamblinglaw.co.nz/research/Relative_Gambling_Harms_Townshend_2011.pdf)



gambling offer. Due to the lower margins and costs the overseas based providers can engage in extensive advertising and provide large rebates to players.

37. Current domestic research<sup>15</sup> has estimated 174,000 New Zealanders gambled online with an offshore operator (all forms of gambling), with per annum customer losses estimated at \$110m.
38. Offshore based online gambling however poses considerable risks:
- a. Offshore based online gambling is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
  - b. Offshore based online gambling has no restrictions on bet sizes;
  - c. Offshore based online gambling has no capacity for venue staff to observe and assist people in trouble;
  - d. Offshore based online gambling reaches new groups of people who may be vulnerable to the medium;
  - e. Offshore based online gambling provides no guaranteed return to player;
  - f. Offshore based online gambling is more easily abused by minors;
  - g. Offshore based online gambling has reduced protection to prevent fraud, money laundering or unfair gambling practices. The most notable recent example being 'Full Tilt Poker' which is alleged by the US Attorney's Office to have diverted USD444m from customer accounts to its directors and shareholders, despite being regulated by the Alderney Gambling Control Commission (Guernsey); and
  - h. As an unregulated form of gambling, on-line gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend that they induce to also open an account and deposit funds.

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<sup>15</sup> Nielsen



39. If a reduction in gaming machines only redirects gamblers to offshore based internet gambling there is no harm minimisation advantage in that strategy. In addition, there are further disadvantages in the fact that no community funding is generated for New Zealanders, no tax revenue is generated for the New Zealand Government and no contributions are made via the New Zealand problem gambling levy.

## Additional Information for Council Staff

40. Additional information on the class 4 sector and problem gambling can be downloaded, including:
- a. *Class 4 Gambling Statistics and Research Paper – Information for Territorial Authorities – 1 March 2013*  
[www.gamblinglaw.co.nz/download/Research/TAInfo.pdf](http://www.gamblinglaw.co.nz/download/Research/TAInfo.pdf)
  - b. *Problem Gambling Resource for Local Government – last updated April 2010*  
[www.gamblinglaw.co.nz/download/Research/TA\\_info\\_April\\_2010.pdf](http://www.gamblinglaw.co.nz/download/Research/TA_info_April_2010.pdf)

## Review Process

41. The current process is a review process. This suggests that the status quo should be reviewed and only amended if there is evidence to show that there is some defect in the current policy.

## Allowing Relocation if a Sinking Lid Policy is Adopted

42. If a sinking lid policy is adopted it is submitted that it is appropriate to allow existing venues to relocate in certain circumstances. The inclusion of a relocation clause in the policy recognises that there are circumstances where it becomes necessary for class 4 venues to establish at a new site. These circumstances might include destruction or damage to existing premises (fire, earthquake etc), lease termination, public works acquisition, site redevelopment and so on.
43. Once a venue has obtained consent its value is artificially increased. This often leads to landlords demanding higher than normal rentals. Allowing relocation prevents landlords demanding unreasonable rentals.



44. Allowing relocation is likely to assist in reducing overall gaming machine numbers. If a non-club 18 machine venue was to relocate the maximum number of machines that could currently be installed at the new non-club venue is 9 machines. The venue may however be prepared to relocate and reduce to 9 machines knowing that it will still have some form of gaming offering. If the venue is required to abandon its gaming operation altogether, the venue may however elect not to move.
45. The following councils have a sinking lid policy but allow existing venues to relocate in certain circumstances:
- a. Hamilton City Council;
  - b. Hastings District Council;
  - c. Horowhenua District Council;
  - d. Kaipara District Council;
  - e. Kawerau District Council;
  - f. South Waikato District Council;
  - g. South Wairarapa District Council;
  - h. Wairoa District Council;
  - i. Waitakere City Council; and
  - j. Whangarei District Council.
46. It is not uncommon for the relocation to be conditional upon the overall machine numbers at the venue reducing and the venue relocating from a low decile area to a higher decile area.
47. The ability to relocate existing venues has been dismissed by council staff due to a mistaken belief that a provision that allowed relocation would be unlawful. On page 3 of the Statement of Proposal it is noted:
- Some councils have previously permitted existing venues to "relocate" under certain conditions, or in specific circumstances. A strict interpretation of the Gambling Act 2003 does not allow for this, so it is not included as a valid option.
48. It is correct that a class 4 venue licence is not transferable. A class 4 venue licence relates to the land, rather than the business. It is also correct that when a business with gaming moves to a new location, gaming can be re-established as of right at the

old premises within a 6 month period. The Gambling Act 2003 does not make any reference to venues relocating. The Gambling Act 2003 does not however prohibit a council adopting a gambling venue policy that has provisions that cater for a relocation in appropriate circumstances.

49. It is entirely possible and perfectly lawful for council to adopt a policy that allows for a new class 4 gambling venue consent to be issued when:

- An existing venue is closing down; and
- The business at the previous location is establishing at a new location.

50. The relocation provision should however have a provision requiring council to be satisfied that gaming will not be re-established at the old location within 6 months. Such an assurance can be provided by the applicant submitting a deed of covenant from the land owner of the old premises confirming that they will not permit gaming to be re-established at the old site within six months.

51. The Department of Internal Affairs' website includes a page headed *Info for Territorial Authorities*.<sup>16</sup> The Department notes on their website that when adopting a gambling venue policy regard should be had to relocation proposals. The website states:

Make sure the wording of your policy clearly covers every situation you intend it to cover. The policy should clearly state how it would operate in every circumstance envisaged by the Act (i.e. club applications under sections 95 and 96, and proposals for a group to relocate from one venue to another.)

52. The Gambling (Gambling Harm Reduction) Amendment Bill ("the Bill") is a private members bill that was introduced by Te Ururoa Flavell of the Maori Party. The Bill was first introduced to Parliament on 9 September 2010. The Bill had its first reading and was referred to select committee on 9 May 2012. On 17 June 2013, the select committee report and recommendations were published.

53. The amended Bill requires territorial authorities to consider whether to include a relocation policy within their gambling venue policy. In considering whether to include a relocation policy, the territorial authority must consider the social impact of gambling in high-deprivation communities within its district.

<sup>16</sup> [http://www.dia.govt.nz/diawebsite.nsf/wpg\\_URL/Services-Casino-and-Non-Casino-Gaming-Info-for-Territorial-Authorities?OpenDocument](http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Services-Casino-and-Non-Casino-Gaming-Info-for-Territorial-Authorities?OpenDocument)



54. The proposed new relocation section is as follows:

**97A Effect of relocation**

(1) This section applies when—

- (a) a territorial authority has adopted a relocation policy (as defined in **section 101(5)**); and
- (b) in accordance with that policy, the territorial authority grants consent in respect of a venue (the **new venue**) to replace an existing venue (the **old venue**); and
- (c) a new class 4 venue licence is granted in respect of the new venue.

(2) When this section applies,—

- (a) the Secretary must cancel the class 4 venue licence that relates to the old venue, in which case—
  - (i) the cancellation takes effect on the date on which the new class 4 venue licence takes effect; and
  - (ii) there is no right of appeal against the cancellation; and
- (b) despite section 100(1)(b)(i), the maximum number of gaming machines permitted to operate at the new venue at the time when the new class 4 venue licence takes effect is the same as the maximum number of gaming machines permitted to operate at the old venue immediately before the licence relating to the old venue is cancelled; and
- (c) for the purposes of this Act,—
  - (i) if the old venue was a venue to which section 92 applied, the new venue must be treated as a venue to which section 92 applies; and
  - (ii) the old venue must be treated as if no class 4 venue licence had ever been held by any society for that venue (which means that, under section 98, consent will be required for that venue if a class 4 venue licence is subsequently applied for in relation to it).

55. In light of the pending change to the Gambling Act 2003, it is submitted that it is appropriate for council to now adopt a relocation provision as part of the overall gambling venue policy.

## Conclusion

56. It is acknowledged that the council needs to strike a balance between the costs and benefits of class 4 gambling. It is accepted that a small percentage (0.3% of the adult population) who play gaming machines do have a problem with their gambling. Casual expenditure on gaming machines is a form of entertainment for a lot of people and over 99% of the public are not adversely affected. Gaming machines provide a considerable amount of community funding to local community groups each year. This funding is the lifeblood of many organisations within Nelson City.
57. The gaming industry has now reached a point where it is heavily regulated by legislation which is described by the Department of Internal Affairs as world leading. Gaming machine numbers are in decline, gaming machine revenue is trending down and gaming machine participation is reducing. In light of the new regulations which are now in place and the natural decline in the gaming machine industry it is submitted that there is no need to change the current cap of 285 class 4 gaming machines.
58. A reduced cap or sinking lid will not reduce problem gambling but will reduce community funding opportunities. A reduced cap or sinking lid may encourage people to seek out other forms of gambling, including offshore based internet and mobile phone based gambling. This form of gambling is very harmful and provides no return to the local community and no contribution to employment, taxation and health services in New Zealand.
59. If a sinking lid policy on gaming machines is adopted, it is submitted that the policy should allow existing venues to relocate in certain circumstances. Allowing relocation avoids rental and property prices being artificially inflated and allows venues to refurbish and redevelop. Allowing relocation will also assist to reduce overall machine numbers and see venues move to higher decile areas.

60. We wish to speak to our submission. Please allocate 10 minutes to talk about class 4 gambling venue issues and a further 10 minutes to discuss our separate submission on TAB Board Venues.

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2 July 2013

# The New Zealand Racing Board's Submission on Nelson City Council's TAB Board Venue Policy



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## The New Zealand Racing Board's Submission on Nelson City Council's TAB Board Venue Policy

### Background

1. The New Zealand Racing Board is a statutory body operating under the Racing Act 2003. The New Zealand Racing Board is the authority responsible for administering racing, racing betting and the racing judicial system in New Zealand and is the only entity which can legally conduct racing betting in New Zealand. The New Zealand Racing Board has approximately 80 stand alone TAB Board Venues in New Zealand. The TAB Board Venues are owned or leased by the New Zealand Racing Board and controlled and run by the New Zealand Racing Board.
2. The New Zealand Racing Board currently has three Pub TABs and two self service terminals in Nelson City as follows:

Name	Address	Type of Outlet
Hardys Bar	135 Hardys Street, Nelson	Pub TAB
Ocean Lodge Hotel	20 Muratai Street, Nelson	Pub TAB
Turf Hotel	228 Songer Street, Stoke	Pub TAB
Nelson Suburban Club	168 Tahunanui Drive, Nelson	Self service terminal
Wakatu Hotel	Collingwood & Bridge Streets, Nelson	Self service terminal

3. Nelson City currently has no TAB Board Venues, i.e. stand alone TABs. Council only has jurisdiction over TAB Board Venues, i.e. stand alone TABs. Council consent is not required under the legislation to establish a TAB facility in a bar, hotel or club.

### Executive Summary

4. The New Zealand Racing Board strongly supports the proposed separation of the TAB Board Venue policy and class 4 venue (gaming machine) policy.





5. The New Zealand Racing Board also invites council to consider removing the restriction on ATMs being within 100 metres of a TAB Board Venue. Given the abundance of ATMs this provision is practically very restrictive.

## Racing in New Zealand and the Tasman-Nelson/Marlborough Region

6. The New Zealand Racing Board via its TAB operation funds and promotes racing in New Zealand. Racing in New Zealand:
  - Contributes more than \$1.6 billion to the New Zealand economy;
  - Creates more than 16,930 full time jobs;
  - Involves over 52,000 people who participate in the racing industry via employment or as a club member, volunteer or owner. This amounts to one in every 83 New Zealanders;
  - Holds more than 1,000 race meetings a year, attended by more than 1 million people;
  - Generates more than \$167 million in export sales of horses;
  - Pays more than \$39 million to the Government each year from wagering taxes alone;
  - Financially supports over 260 community groups and charities; and
  - Supports over 400 community organisations via the sharing of racing club facilities and resources.
7. In economic terms, the New Zealand racing industry (\$1.6 billion) is comparable in size to the wine industry (\$1.5 billion) and the seafood industry (\$1.7 billion).
8. The racing industry is strong in the Tasman-Nelson/Marlborough region. The racing industry in the Tasman-Nelson/Marlborough region is responsible for the generation



of more than \$6.89 million in value added contribution to GDP. In Tasman-Nelson/Marlborough there are:

- More than 530 full time, part time, casual and volunteer racing industry participants. This equates to more than 68 full time equivalent jobs, generating more than \$3.2 million in wages and salaries for those employees;
  - 3 racing clubs;
  - 3 racing tracks;
  - Over 345 racing club members;
  - Over 10 race meetings held annually;
  - Over 14,850 people who attend local race meetings each year;
  - Over 90 breeders (who spent \$1.26 million in the 2008/2009 financial year);
  - Over 25 trainers (who spent \$1.04 million in the 2008/2009 financial year);
  - Over 60 racing animals in training; and
  - Over 270 local owners (who received in the 2008/2009 financial year \$1.1 million in prize money).
9. The above findings are set out in full in an October 2010 report, *Size and Scope of the New Zealand Racing Industry.*<sup>1</sup>

#### Separation of the TAB Board Venue Policy from Class 4 Gambling Venue Policy

10. Council currently has one policy which covers both TAB Board Venues and class 4 gambling.
11. When council adopts a gaming machine policy, the policy is adopted under section 101 of the Gambling Act 2003. When formulating the gaming machine policy council has regard to the purpose of the Gambling Act 2003, which includes as one of its purposes the “control of growth”.

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<sup>1</sup> [http://static.tab.co.nz/control/data/nzrb-other-reports/NZRB\\_Size\\_and\\_Scope\\_Final.pdf](http://static.tab.co.nz/control/data/nzrb-other-reports/NZRB_Size_and_Scope_Final.pdf).



12. In contrast to the gaming machine policy, a TAB Board Venue policy is adopted under section 65D of the Racing Act 2003. Council must have regard to the Racing Act's purpose when formulating the TAB Board Venue policy.
13. The Gambling Act and Racing Act have very different purposes. The Racing Act's purpose does not include the "*control of growth*", quite the opposite. The Racing Act has a very clear purpose, namely to facilitate race and sports betting. The Racing Act's purpose is:
- to provide effective governance arrangements for the racing industry; and
  - to facilitate betting on galloping, harness, and greyhound races, and other sporting events; and
  - to promote the long-term viability of New Zealand racing.
14. It is submitted that the TAB Board Venue Policy should refer to the Racing Act's purpose and be considered having regard to that purpose.
15. At the Nelson City hearing on 13 May 2010 council obtained advice from their senior legal advisor regarding the separation of the two policies. In the written report to council it was noted:
- Advice from the Senior Legal Advisor is that as the Racing Act 2003 is a separate piece of legislation then arguably Council should have a separate [TAB] policy.
16. The following councils have separate class 4 and TAB Board Venue policies:
- Chatham Islands Council
  - Gore District Council
  - Grey District Council
  - Hamilton City Council
  - Hastings District Council
  - Horowhenua District Council
  - Hurunui District Council
  - Hutt City Council
  - Kaipara District Council



- Kapiti Coast District Council
- Matamata-Piako District Council
- New Plymouth District Council
- Opotiki District Council
- Otorohanga District Council
- Palmerston North City Council
- Rangitikei District Council
- Southland District Council
- South Taranaki District Council
- Upper Hutt City Council
- Waimakariri District Council
- Waimate District Council
- Waipa District Council
- Wairarapa District Council
- Wairoa District Council
- Western Bay of Plenty District Council
- Whangarei District Council

17. Over the last three years the New Zealand Racing Board has during the consultation process requested that councils separate their policies. Almost all councils spoken to to-date have indicated that they will separate the policies. Recently the Christchurch City Council, Gore District Council, Grey District Council, Horowhenua District Council, Hurunui District Council, Hutt City Council, Kaipara District Council, Kapiti Coast District Council, Nelson City Council, New Plymouth District Council, Otorohanga District Council, Palmerston North City Council, Southland District Council, South Taranaki District Council, Upper Hutt City Council, Waimakariri District Council, Waimate District Council, Wairoa District Council, Western Bay of Plenty District Council and Whangarei District Council amended their policy and formally separated the TAB and class 4 policies. The Hurunui District Council in their letter of 28 September 2009 stated:

The Council agreed to adopt two gambling venue policies; one for TAB venues and another for Class 4 venues. It was agreed that these venue types are very different and that this will enable the merits of restrictions on either type of gambling to be debated separately, should it arise in the future.

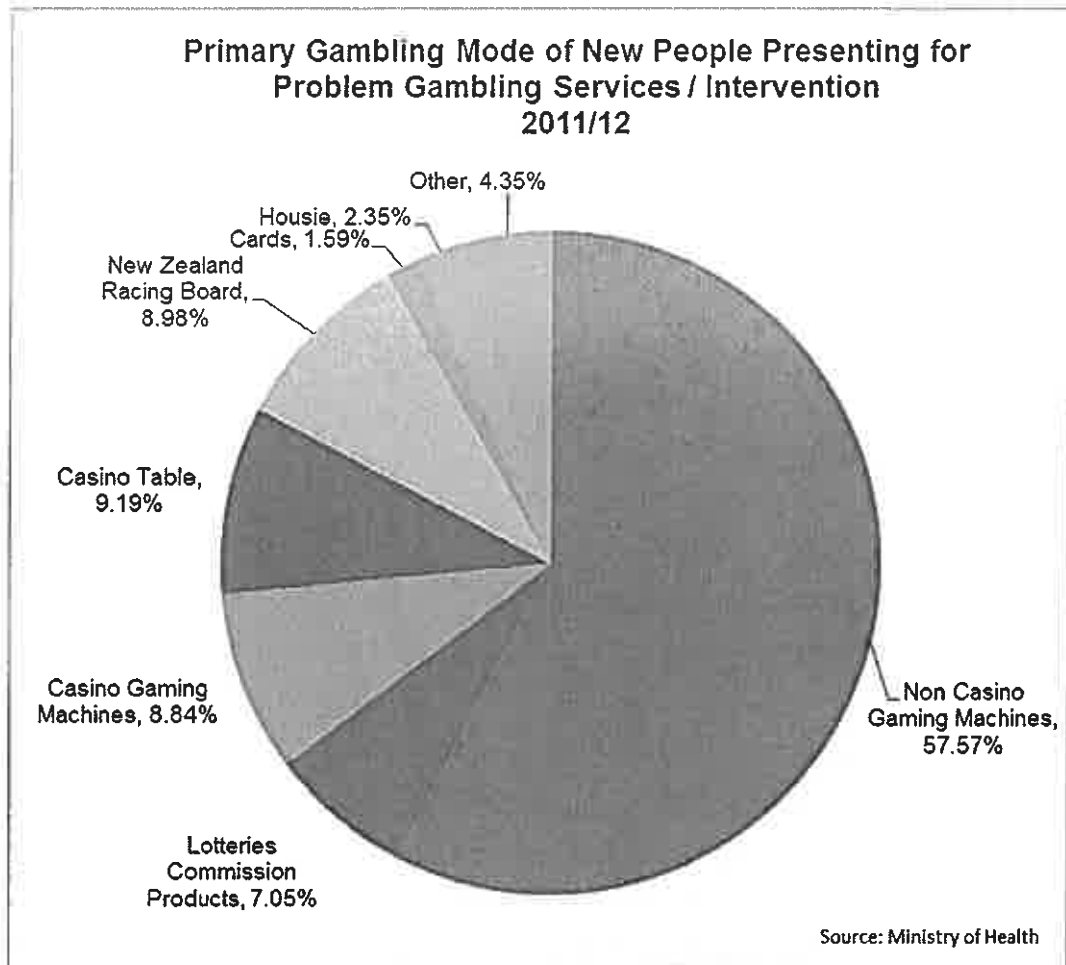


18. By incorporating both policies in one combined document and having a single public consultation the discussion and submissions focus on the harm caused by gaming machines without due consideration being given to TAB Board Venues. The writer has attended almost all the gambling venue public consultation hearings held by the various councils in New Zealand over the last seven years and found that the process was dominated entirely by criticism in respect of gaming machines without any consideration being given to the separate issue of TAB Board Venues. Despite thousands of submissions being made to local councils over the last seven years, only a handful of submissions have suggested that TAB Board Venues be restricted.
19. TAB Board Venues are different from class 4 venues. Race and sports betting is different from the rapid and repetitive gambling undertaken on a gaming machine. Race and sports betting does not have a high prevalence of problem gambling. Only approximately 6.98% of all new problem gamblers indicate a problem with race betting. Only 2.00% of all new problem gamblers report a problem with sports betting. In contrast to this, approximately 66.41% of new problem gamblers report a problem with gaming machines (both casino gaming machines and non-casino gaming machines). The Ministry of Health's website<sup>2</sup> details the primary mode of gambling for new problem gambling clients for the 2011/2012 financial year as follows:

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<sup>2</sup> [http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total\\_assisted](http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted)





Source: Ministry of Health Website [http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total\\_assisted\\_](http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted_)

20. In the 2010 Health Sponsorship Council report it was noted that people who participated in horse and race betting were predominately low-risk gamblers.<sup>3</sup> The report states at page 22:

Regular sports and racing betting was more likely to be done by low-risk gamblers, whereas regular pokie machine playing was more associated with moderate risk and problem gambling.

21. TAB Board Venues are operated by the New Zealand Racing Board, a statutory body. TAB Board Venues are highly supervised, have highly trained staff and are subject to regular internal audits.

<sup>3</sup> Gray, R 2011 *New Zealanders' Participation in Gambling: Results from the 2010 Health and Lifestyles Survey – Health Sponsorship Council* [http://www.hsc.org.nz/sites/default/files/publications/Gambling\\_Participation\\_final-web.pdf](http://www.hsc.org.nz/sites/default/files/publications/Gambling_Participation_final-web.pdf)



22. It is now common for councils to have very different policies for class 4 gambling and TAB Board Venues. Several councils have a sinking lid in respect of their class 4 policy but no restriction on TAB Board Venues. Examples include:

- Christchurch City Council;
- Gisborne District Council;
- Hastings District Council;
- Kaipara District Council;
- Nelson City's current policy;
- Tararua District Council;
- Thames-Coromandel District Council;
- Waikato District Council;
- Wairoa District Council; and
- Waitakere City Council.

23. A policy that enables a new TAB Board Venue to establish will not result in an increase in gaming machines. Some TAB Board Venues also have class 4 gambling. However, in order to establish a new TAB Board Venue with gaming machines, two consents would be required, a TAB Board Venue consent under the TAB policy and a separate class 4 gambling consent under the gaming machine policy.

#### Advantages of a Separate TAB Board Venue Policy

24. Having a separate TAB Board Venue policy has the following advantages:

- A separate policy ensures each policy is technically and legally correct;
- A separate policy ensures that a major channel of the New Zealand Racing Board's operation is given a fair hearing with due consideration; and
- A separate policy ensures that only relevant considerations are taken into account.



Disadvantages of a Separate TAB Board Venue Policy

25. Separating the two policies will result in council staff spending a small amount of additional time formally reviewing two policies rather than one. However given that the TAB Board Venue policy is unlikely to be controversial the additional time incurred will be nominal. Both policies are legally required to be reviewed every three years. If any change to the policy is considered each policy must have a full public consultation process undertaken. Given that there is unlikely to be any negative public feedback or concern regarding TAB Board Venues it is likely that the TAB Board Venue policy will be reviewed by council staff and then rolled over for a further three years without a full public consultation process. If a full public consultation process is undertaken this is likely to only attract two or three public submitters and be able to be dispensed with within half an hour (this was the recent experience in Christchurch and Wairarapa). If a small amount of additional time is required due to the separation of the policies, it is submitted that this additional time is justified as a matter of good governance.

TAB Board Venues and Harm Minimisation

26. The New Zealand Racing Board takes its statutory responsibilities under the Racing Act 2003 to minimise problem gambling very seriously. The New Zealand Racing Board conducts its business activities with integrity and is committed to providing a safe and enjoyable environment for customers to wager responsibly.
27. The New Zealand Racing Board participates in the Problem Gambling Expert Advisory Group established by the Ministry of Health and Department of Internal Affairs, to ensure that it has a high understanding of the issues associated with problem gambling, and the effective management of problem gambling.
28. All TAB Board Venues are connected via closed circuit television to a central monitoring office.
29. All TAB Board Venues have signage displayed which encourages players to gamble only at levels they can afford and provides advice on how to seek assistance for problem gambling.



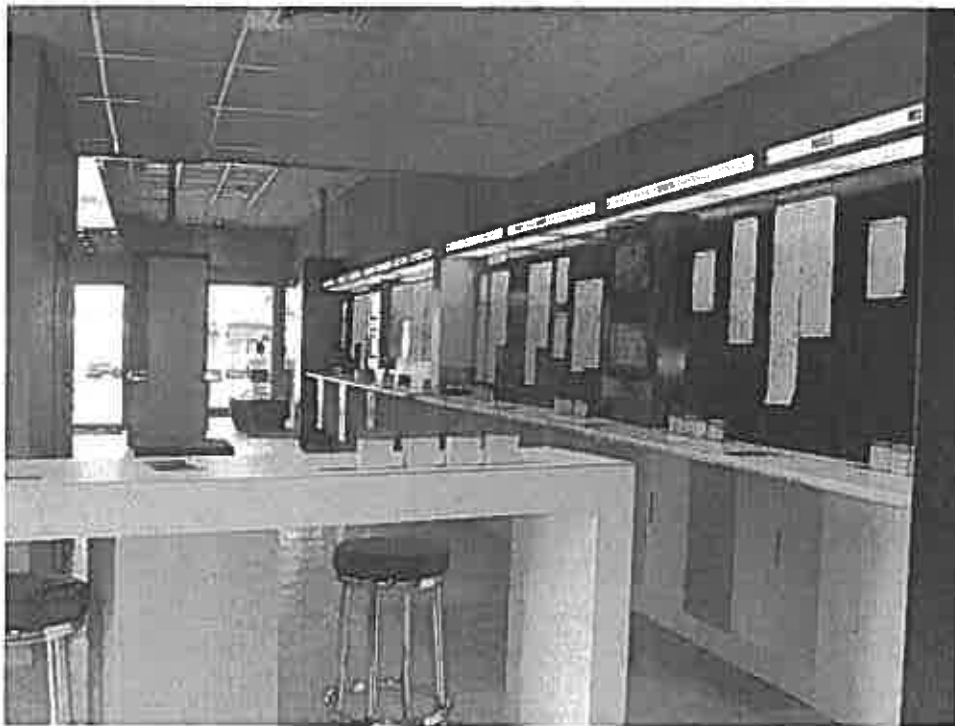


30. TAB Board Venues are also subject to regular internal audits and spot checks to ensure adherence to the legislative and regulatory requirements along with the New Zealand Racing Board's own problem gambling policy requirements.
31. No automatic teller machines are located at any TAB Board Venue.
32. All TAB Board Venues have a harm minimisation policy. The policy was developed in conjunction with the Problem Gambling Foundation and is recognised as being industry leading.
33. All TAB Board Venue staff have received specialist harm minimisation training. The training is undertaken by the Problem Gambling Foundation and is comprehensive. The staff are trained to take appropriate action if a person shows the behavioural signs, or is at risk of, or is identified as, having a gambling problem. This includes providing information about problem gambling support services.
34. When a TAB venue supervisor has reasonable grounds to believe a customer may have difficulties related to gambling, the venue supervisor is required to approach the customer. The venue supervisor is instructed to strike up a conversation with the customer, and as part of the conversation ask the customer about his or her gambling. During this discussion concerns are raised about the customer's habits. The venue supervisor is then required to provide the person with information on problem gambling, and problem gambling service providers.
35. Where a customer has been identified as a potential or actual problem gambler, the venue supervisor provides the customer with information pamphlets on responsible gambling that contains the following:
  - the recognised signs of problem gambling;
  - gambling helpline contact number; and
  - the New Zealand Racing Board's "Self Exclusion" and "Set Your Limits" processes.



36. The venue supervisor is also required to remind the customer:
- in the case of a wagering venue, of the ability to refuse to accept any bet without giving a reason for doing so; and
  - that they can exclude themselves from any gaming machine area at the venue for up to two years.
37. The TAB Board Venues in New Zealand are being remodelled. The photos below show the clean, modern look of the new TAB Board Venues.





JWT-464501-152-35-V1:jef





#### The Problem Gambling Foundation

38. The New Zealand Racing Board's harm minimisation training is industry leading. The New Zealand Racing Board is one of the few organisations which has contracted the Problem Gambling Foundation to undertake all its on-site training. The use of an independent third party ensures that a comprehensive training package is provided based on the latest research from around the world. The trainers are experts in their field, who have considerable experience in dealing with problem gamblers on a one on one basis.
39. The New Zealand Racing Board has been acknowledged by the Problem Gambling Foundation as having an extremely high host responsibility standard. In 2007 the Hamilton TAB applied to the Hamilton City Council for gambling venue consent. The then Chief Executive of the Problem Gambling Foundation, John Stansfield, commented on the application in his email of 22 November 2007 as follows:

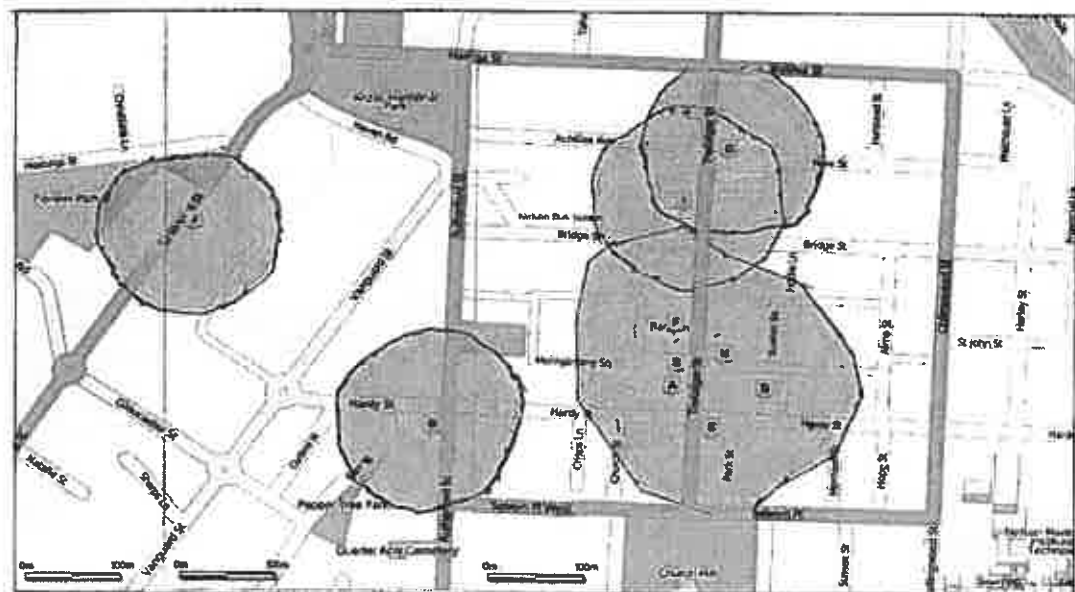
We acknowledge the significant effort of NZRB in improving their host responsibility policy and agree **it is one of the best and probably the best operating in Hamilton...**

40. The consent application was subsequently granted by the Hamilton City Council.



Location Restriction – 100m from an ATM

41. Establishing a new TAB Board Venue in Nelson City would be almost impossible given the abundance of ATMs. The major trading banks have ATMs conveniently located on almost every corner. Further, companies now offer non branded ATMs to convenience stores. The store receives a small commission per transaction. ATMs can be established and removed at will.
42. Below is a map detailing the areas which are within 100m of an ATM. The map confirms that the restriction prohibits any new venue being established in the bulk of the central CBD.



Access within 100m of an ATM

43. The location of ATMs was considered by Parliament when the racing regulations and gambling regulations were set. After reviewing all the research Parliament elected to prohibit ATMs from TAB Board Venues and ATMs from gaming lounges. There is no research or evidence to suggest that a further restriction is warranted.
44. Finally, a restriction on ATMs is in practice ineffective due to the existence of EFTPOS terminals in all gambling venues.



## Conclusion

45. TAB Board Venues are different from class 4 venues. Race and sports betting has a very low prevalence of problem gambling. Only approximately 6.98% of all new problem gamblers indicate a problem with race betting. Only approximately 2.00% of all new problem gamblers report a problem with sports betting. The proposed separation of the TAB Board Venue policy and class 4 policy is fully endorsed. The separation will ensure that the TAB Board Venue policy is considered on its own merits without irrelevant considerations being taken into account.
46. It is submitted that it is appropriate to reconsider the restriction prohibiting a TAB Board Venue being located within 100m of an ATM. ATMs are very common and can be set up overnight. The restriction makes it extremely difficult for a new TAB Board Venue to be established and is ineffective given that cash out can be obtained from EFTPOS terminals.
47. We wish to speak to our submission. Please allocate 10 minutes to talk about TAB Board Venue issues and a further 10 minutes to discuss our separate submission on the issue of gaming machine gambling.

  
\_\_\_\_\_  
Jarrod True  
Solicitor for New Zealand Racing Board  
[Jarrod.True@harkness.co.nz](mailto:Jarrod.True@harkness.co.nz)  
0800 426 254  
0274 527 763

2 July 2013



**Submission on the Nelson City Council's 2013 Review of the Gambling Policy**

32 ✓

June 2013

Name: Josephine Faragher

Phone: 03 5489336

Address: 36<sup>A</sup> Jenner Rd Nelson.

I am writing this submission in my capacity as social worker →  
health manager.

~~I would like to speak to Nelson City Council about my submission~~

The council have invited submissions on the proposal to changes the existing NCC Gambling Policy. I would like to confine my submission to the specific proposals for changes announced by the NCC on the understanding that except for these changes the NCC Gambling Policy will be the policy adopted in 2007.

**1. The Proposal to institute a sinking lid on Pokie venues**

I support this proposal; The NZ experience since the year 2000 shows that sinking lids do work and the disadvantages that have been attributed to them in fact do not occur. The table below shows that Pokie machine numbers and the amount lost by gamblers are closely correlated, that both peaked in the 03-05 period and that both have been decreasing consistently since that time.

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
<b>\$Million spent on Class IV pokie machines</b>												
450	597	777	941	1035	1027	906	950	938	889	849	856	854
<b>Number of Class IV machines</b>												
15000	17150	20087	24330	22497	21846	20739	20302	20182	19736	18944	18484	17943

DIA 2013

Two arguments are commonly advanced against sinking lids. One is that the reduction in machine numbers that a sinking lid would cause will result in less money coming back to the community. Not only is this argument incorrect but there are good reasons why Nelson should expect a greater level of Pokie funding in the future even with a lower number of Pokie machines as a result of a sinking lid policy.

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The NZ evidence overall is that since 06 although there has been a reduction in the number of Pokies and venues, the amount of money returned to community including sports that have professional arms and racing, has not dropped significantly as demonstrated in the table below.

In NZ from 2006 to 2011 the amounts granted were

\$ 269,124,463	\$ 261,668,788	\$ 248,405,123	\$ 292,983,708	\$ 236,017,254	\$ 260,676,172
2,006	2,007	2,008	2,009	2,010	2,011

DIA 2012

It can be seen that the amount per annum dipped below the current total in some years but the average was \$261,5 million for the period which is almost identical to the most recent year for which data are available. The return to communities has continued at about the same levels as a result of the Pokie Trusts improving the proportion of the losses they return to the community.

In addition in the past the societies that operate Pokie machines tended to channel grant money into national projects and to projects based in larger cities effectively draining money from smaller centres such as Nelson. The best data available on this come from the Problem Gambling Foundation's data base which has been audited by Price Waterhouse (an audit funded by the Ministry of Health). This shows that although these societies are required to return 37.12% of Pokie losses to the community smaller communities tend to receive funding in the range of 10-12% of total losses as the balance goes into larger communities.

Over last two years and most societies have implemented policies to return higher proportions of the total gamblers losses to the community in which they were collected. As these policies come into effect Nelson can expect to receive increased Pokie funding even if as the total dollar amount lost in this area decreases.

The second and also spurious argument against sinking lids is that Councils should maintain Pokie numbers as in some way this protects people from gambling on the internet and there is evidence that internet gambling is even more harmful than Pokie gambling.



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While it is true that there is good evidence that gambling on internet Pokies, Casino Games and Poker is more harmful than all other kinds of gambling, there are also good NZ prevalence studies that show that NZers are not adopting internet gambling. Only 2% of NZers gamble on the internet and this gambling is mainly the purchase of Lotto tickets (which are recognised as a low harm gambling mode) rather than the use of internet Pokies Casino Games and Poker. This view is explicitly supported by the Ministry of Health who in their 2013-2016 Gambling Harm Minimisation Plan have stated that they do not see internet gambling as becoming a significant problem in NZ during this period.

**2. The proposal to limit the number of Pokies that merging Club venues can have to a maximum of 18.**

I do not support this measure as a plethora of evidence exists showing that Club venues are safer gambling environments than Pub venues. This view has been acknowledged in previous NCC documents, in the various documents prepared by the Ministry of Health and in independent research carried out in the SHORE study 2010. In Nelson there are only two Clubs that could merge and if they did the result would be a Club with 25 Pokies. On the basis of all available evidence if this were to happen the resulting club would offer an alternative to Pub Pokie gambling venues that would be safer than an 18 machine Pub venue and thus should be encouraged.

**3. The proposal to separate the NCC Gambling Policy into two policies one for Class 4 gambling under the Gambling Act 2003 and a separate one to cover gambling under the Racing Act 2003.**

I object to this proposal as it is irrelevant to Nelson.


New NZRB venues- that is, stand alone TAB's have a mixture of both Pokie gambling and TAB gambling. There are already 32 mixed Class 4 and Racing Act gambling venues like this in NZ and as the NZRB is now a registered class 4 gambling society under the Gambling Act it is reasonable to expect that any new NZRB venue(s) in Nelson would also be mixed Act gambling venues. This undermines the rationale for separating these two types of gambling venues.

I submit that separating these Racing Act and Gambling Act into two policies would add complexity and confusion without having any practical advantage for Nelson.

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4. The proposal to retain the existing NCC Gambling Policy except for the items addressed above.

I support the proposal to retain the existing, that is the 2007 NCC Gambling Policy with the addition of a sinking lid as retaining the 2007 gambling policy would amount to the NCC keeping faith with the robust consultative process that was undertaken in forming the this policy and as this policy is currently working very well.

  
21/7/2013

Natascha Van Dien

---

**From:** Submissions  
**Sent:** Thursday, 4 July 2013 9:59 a.m.  
**To:** Administration Support  
**Subject:** FW: Submission on Gambling Policy Review

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

---

**From:** Ross Wylie[SMTP:ROSSWY@HOTMAIL.COM]  
**Sent:** Thursday, July 04, 2013 9:58:36 AM  
**To:** Submissions  
**Subject:** Submission on Gambling Policy Review  
**Auto forwarded by a Rule**

Gambling Policy Review  
Submission to the Nelson City Council

**Comment:**

Gambling in the broadest sense has been a part of civilisation whether for monetary gain, dominance or achievement in the many opportunities that life offers.

I prefer to see policies by local authorities that encourage people to have the will power to develop their own physical and or intellectual attributes to provide sustainable incomes or benefits as individuals or collectively rather than rely on the charity of others or the luck of throwing the dice.

The Proposal:

1. I agree with the Council's overall objective of their Gambling Policy which states;  
"To support and promote harm minimisation principles for gambling activities within the Nelson City area."
2. I support paragraph 3, The Proposal, as part of the Gambling Policy Review, especially statements (i) and (ii) for incorporation into Council's Gambling Policy.

Yours faithfully

Ross E J Wylie  
4 July 2013  
93 Mount Street,  
Nelson South  
Nelson 7010



4 July 2013

Tasman Rugby Union  
PO Box 7157  
Nelson

FREEPOST 76919  
Consultation  
NCC  
PO Box 645  
Nelson 7040

**By Email – [enquiry@ncc.govt.nz](mailto:enquiry@ncc.govt.nz)**

Dear Sir/Madam

**Submission: Gambling Policy Review**

Submission made on behalf of:

**Tasman Rugby Union**

The contact person in respect of this submission is:

Andrew Flexman  
Chief Executive Officer  
Direct Dial – 03 546 7722/Mobile - 0274995980

Thank you for the opportunity for Tasman Rugby Union to provide a submission on the Gambling Policy Review.

I do not wish to appear before the Committee to speak to our submission.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Andrew Flexman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrew Flexman  
Chief Executive Officer  
Tasman Rugby Union

## Gambling Policy review

### Summary:

The Tasman Rugby Union wishes to oppose the Nelson City Council's proposal to introduce a 'sinking lid' policy around gaming.

The Tasman Rugby Union and sport in general is heavily reliant on this source of funding to support their programmes, competitions and infrastructure. Without access to these funds there will be a decline in participation in organised sport which will in turn have negative social impacts.

The social impacts will in our submission far outweigh the negative impacts associated with problem gambling. The pokie machine industry redistributes a significant portion of proceeds generated into problem gambling for the benefit of the very small percentage of the population that grapple with addiction. If local and/or central government were genuinely focused on reducing the harmful effects of gambling then the internet should be targeted. At least the pokie machine environment can be monitored and regulated to mitigate the harmful effects.

### Tasman Rugby Union and Gaming Funding:

Nelson Bays Rugby Union was first formed in 1870. Marlborough Rugby Union was formed in 1888. These two Unions amalgamated to produce what is known today as the Tasman Rugby Union, formed in 2005

The Nelson Bays Union is comprised of 20 Rugby Clubs & Schools (excluding Primary Schools) – including Nelson RFC one of the first official Rugby Clubs formed in New Zealand in 1868. The Marlborough Rugby Union is comprised of 11 Rugby Clubs & Schools (excluding Primary Schools).

In excess of 240 Teams from U-6 through to Division 1 take to the fields each Saturday between the Unions. During the Representative Season we select and fund approximately 26 provincial teams across the Nelson/Marlborough Region.

The total number of rugby players, coaches, referees and administrators across the region are as follows:

#### Nelson Bays

- Junior Players = 2291;
- Senior Players = 771;
- Coaches = 241;
- Referees = 42;
- Admin = 147;
- Total = 3492

#### Marlborough

- Junior Players = 1205;
- Senior Players = 686;

- Coaches = 142,
- Referees = 32,
- Admin = 46;
- Total = 2111

#### Tasman

- Admin = 15;
- Coaches = 27;
- Total = 42

The Tasman Rugby Union is heavily reliant on gaming funding to support the community game in our region. In the last 5 years we have received approximately \$500,000 per annum for this purpose. We are currently operating in an extremely tough financial environment and we simply could not continue to operate viably without this source of funding. If gaming funding is removed or substantially reduced where is the shortfall coming from?

It is also important to mention the likely social consequences of less participation in sport. We have a mantra in this province that "*participation in sport keeps kids out of court*". Our youth are growing up today in an increasingly complex world where many important values are lost along the way. The lessons of sport create better people able to make a meaningful contribution to society beyond just exploits on a playing field.

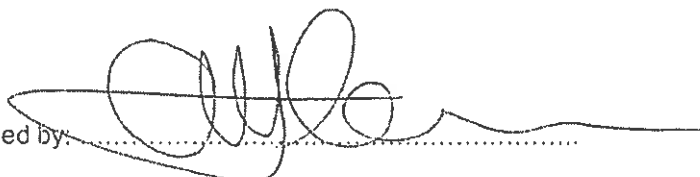
We are not convinced that there is a strong link between the number of pokie machines in the community and problem gambling. Indeed, all of the statistics and reports that we have read suggest that NZ has a very low rate of problem gambling. It is a sad reality of our society that people with addictive personalities will always find a way to gamble whether it is on pokie machines or via other avenues. Would it not be more sensible to regulate against the proliferation of online gambling sites rather than pokie machines where controls can be put in place?

#### **Conclusion:**

The Tasman Rugby Union welcomes initiatives that support targeted and workable efforts to reduce harm from all forms of legal gambling. However, there will always be people that become addicted to some form of gambling in society; it is human nature as opposed to a direct by-product of pokie machines. It seems that the response to addiction and/or social harm is disproportionately focused on pokie machines.

For the reasons outlined above the Tasman Rugby Union **does not support** the proposal by NCC to place a 'sinking lid' on gaming machine numbers.

Signed by: .....



Andrew Flexman  
Chief Executive Officer  
Tasman Rugby Union

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Submission on Gambling Policy Review  
**Date:** Friday, 5 July 2013 8:35:56 a.m.

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-----  
**From:** Council Enquiries (Enquiry)  
**Sent:** Friday, July 05, 2013 8:35:53 AM  
**To:** Submissions  
**Subject:** Submission on Gambling Policy Review  
**Auto forwarded by a Rule**

# Submission on Gambling Policy Review

**Your name**

Debbie Christie

**Organisation represented (if applicable)**

Primary Health Organisation

**Your address**

20 New Street  
Nelson

**Your phone number**

035458873

**Your email address**

debbie.christie@nbph.org.nz

**Would you like to talk about your submission at a hearing?**

No

**Your submission**

1/ I agree with maintaining the proposal to maintain the 2007 Gambling Policy as a lot of work went into this.

2/ I agree with a sinking lid policy which many other councils have adopted.

3/ I do not support the proposal to limit the number of machines to 18 should two clubs merge as there is a huge amount of evidence showing that Club venues are safer gambling environments than Pub venues.

4/ I do not support the proposal to separate the NCC Gambling Policy into two policies one for Class 4 gambling under the Gambling Act 2003 and a separate one to cover gambling under the Racing Act 2003. New NZRB venues- that is, stand alone TAB's have a mixture of both Pokie gambling and TAB gambling. There are already 32 mixed Class 4 and Racing Act gambling venues like this in NZ and as the NZRB is now a registered class 4 gambling society under the Gambling Act it is reasonable to expect that any new NZRB venue(s) in Nelson

would also be mixed Act gambling venues. This undermines the rationale for separating these two types of gambling venues. I submit that separating these Racing Act and Gambling Act into two policies would add complexity and confusion without having any practical advantage for Nelson.

**Would you like to upload a file in support of your submission?**



**Bev McShea**

---

**From:** Submissions  
**Sent:** Friday, 5 July 2013 10:54 a.m.  
**To:** Administration Support  
**Subject:** FW: Draft Gambling Policy - Nelson Tasman Hospice Trust Submission  
**Attachments:** NCC Gamble Policy - NT Hospice submis 6 July 2013.pdf

---

**From:** Jane McLeod on behalf of Council Enquiries (Inquiry)  
**Sent:** Friday, July 05, 2013 10:54:22 AM  
**To:** Submissions  
**Subject:** FW: Draft Gambling Policy - Nelson Tasman Hospice Trust Submission  
**Auto forwarded by a Rule**

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**From:** Hamish Kennedy [<mailto:project.manager@nelsonhospice.org.nz>]  
**Sent:** Friday, 5 July 2013 10:23 a.m.  
**To:** Council Enquiries (Enquiry)  
**Cc:** 'elspethkennedy@xtra.co.nz'; Marie Johnstone; [Graeme@pubcharity.org.nz](mailto:Graeme@pubcharity.org.nz); NZCT; Liz Redmond ([liz@pelorustrust.net.nz](mailto:liz@pelorustrust.net.nz)); [jonny.gritt@lionfoundation.org.nz](mailto:jonny.gritt@lionfoundation.org.nz); 'info@trillian.co.nz'; 'info@southerntrust.org.nz'  
**Subject:** Draft Gambling Policy - Nelson Tasman Hospice Trust Submission

Please find attached my submission on behalf of the Nelson Tasman Region Hospice Trust, for the NCC Mayor and Councillors' information and consideration.

Kind regards,

**Hamish Kennedy**

**Project Manager - Fundraising & Marketing**  
Nelson Tasman Region Hospice

23 Alma Street, Buxton Square | PO Box 712, Nelson 7010 | Ph: 03 546 7254 | Home: 03 548 3797  
E: [project.manager@nelsonhospice.org.nz](mailto:project.manager@nelsonhospice.org.nz) | W: [www.nelsonhospice.org.nz](http://www.nelsonhospice.org.nz)

*Atawhaihia, Manaakīhia Mō Ake Tonu - To Care Always*

**Nelson Tasman Hospice**  
*to care always*

*Have a positive day!*

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only	
	Submission Number
File Ref	INITIALS

Name HAMISH KENNEDY, Project Manager

Daytime phone 03 548 3797

Address c/- PO Box 283, Nelson 7011

Organisation represented (if applicable) Nelson Tasman Region Hospice Trust

Do you wish to be heard in support of your submission?  YES  NO # of pages

           If you do not tick a box we will assume you do not wish to be heard.

**Public information**

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

As a member of an organisation that benefits from charitable gaming machine funding,

- > Gaming machines have been in New Zealand for a long time.
- > Most people play machines without any problems, the money that the machines generate for our organisation is important.

Therefore we do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on gaming machine numbers.

**Our detailed submission is attached**

Date 6 July 2013 Signature 

*Help with making a submission overleaf...*



**Nelson City Council**  
te kaunihera o whakatu

PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

Submission to Nelson City Council.

### Gambling Policy Review

The Nelson Tasman Region Hospice Trust has over a number of years established a beneficial relationship with most of the charitable trusts involved in the distribution of funds derived from Pokie machine operation. Since the year 2000 we have received in excess of \$2,000,000.

An organization such as ours requires funding at these levels, in our case to bridge the funding gap between the government contribution and the needs of our service.

The fact that the majority of trusts administration is situated outside of the Nelson region has not appeared in any way to inhibit the amount of funds distributed in our area. The quarterly publicizing of grant applications and amounts approved, upon inspection, clearly shows that Nelson is well represented. Although they may not be required to do so the grants are made in order to reflect the earnings of the outlets.

We don't deny the effects on a small number of people with gambling problems, this is somewhat mitigated the fact that the trusts are required to provide 1.4% or \$13,000,000 of the total \$18.5M to the Ministry of Health for harm minimization initiatives. Further more the provision of regulations such as machine monitoring, bet restrictions, limited prizes and onsite training of staff helps to identifying issues earlier. Each venue must by law have signage and be supervised by trained staff to identify and provide intervention services to those who identify themselves as problem gamblers. Voluntary and registered self-exclusion from venues is available. The Industry is heavily regulated and monitored

If the answer to social harm was to prohibit pokies, then the \$50M spent over the last 9 years on research would say this. It doesn't. The issues are much more complex than that and linked to many other factors.

The majority of pokie gamblers are not problem gamblers, their legitimate partaking of a lawful leisure pursuit has benefit to community groups for funding not otherwise available to organisations such as ours limited to government contracts which are constantly pressuring further community support to make up the shortfall in provision of quality services. Any reduction in funding from the community such as that provided by Pokie Trusts will have a direct correlation in the quality of services that we provide. In other words, less money will mean reduced services.

Our position is that sinking lids won't work. Gambling as a whole is still reasonably constant. Picking on pokies simply changes gamblers buyer behaviour to other forms of gambling products such as government supported LOTTO and TAB. Online gambling is growing driving people behind closed doors away from support. In 2004 anti-gaming advocates said less machines would create less Problem, but the number of machines have fallen by 30% and similar dollar value 'taken' from the community such as our organisation.

Nelson Tasman Region Hospice Trust

Charities Commission Registration Number: CC24279 | PO Box 283, Nelson 7040 | [www.nelsonhospice.org.nz](http://www.nelsonhospice.org.nz)

The sinking lid policy would not only result in an increasingly smaller pool of grants, but would also deny legitimate, existing and potential, operators from pursuing their business in the event that venue is required to change site or new site is proposed. A sinking lid policy will negatively affect the local economy through contribution to local expenditure, employment with negative consequences of reduced social and cultural benefits. A sinking lid policy is an easy political 'out' enabling those making such a decision to deny the consequences of their action due to time. Politicians simply won't be around when the impact of their decision is revealed.

We believe that the capped option fulfills the needs of the community, the gambler and the not for profit groups that rely on charitable trust for support enabling the professionals involved with our organization to get on with what they do best.

The Nelson Tasman Hospice Trust opposes a sinking lid policy proposed by Nelson City Council.

Hamish Kennedy  
Project Manager

The Nelson City Council wants your opinion. Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number	
File Ref		INITIALS	

Name Nelson Basketball Association (Inc)

Daytime phone 03 547 6419

Address 104 Neale Avenue, Stoke, Nelson

Organisation represented (if applicable) \_\_\_\_\_

Do you wish to be heard in support of your submission?  YES  NO # of pages

\_\_\_\_\_ If you do not tick a box we will assume you do not wish to be heard.

Public information

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

\_\_\_\_\_

As a not for profit regional sporting organisation that benefits from charitable gaming machine funding, the ramifications of a sinking lid policy are wide reaching. Community funding is hard to access, the commercial support in Nelson Tasman is limited, the socio-economic groups, wide. Sport is quickly becoming a full user pays past time and without support from gaming machine trusts many, many people will not have the opportunities to participate.

\_\_\_\_\_

- Gaming machines have been in pubs in New Zealand for a long time.
- Most people play machines without any problems, the money that the machines generate for our organisation is important.
- Getting access to funding is hard enough without reducing the number of gaming machines.

\_\_\_\_\_

I do not support the proposal by the Nelson City Council (clause1) to place a 'sinking lid' on gaming machine numbers.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date 05 July 2013

Signature 

Help with making a submission overleaf...



Nelson City Council

P.O. Box 615, Nelson 7010, 03 546 0200

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
File Ref		Submission Number	
		INITIALS	

Name Nigel Murray-Brown, GM operations

Daytime phone (09) 487 0396

Address Private Bay 102920, North Shore, Auckland 0745

Organisation represented (if applicable) The Lion Foundation

Do you wish to be heard in support of your submission?  YES  NO # of pages 6 double sided.  
\_\_\_\_\_ If you do not tick a box we will assume you do not wish to be heard.

**Public information**

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

Please see submissions attached.

Date 5 July 2013 Signature [Signature]

Help with making a submission overleaf...



PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

### How to make a submission

Remember to have your say – online or in writing. You can make a submission online at the Council's website, [www.nelsoncitycouncil.co.nz](http://www.nelsoncitycouncil.co.nz), at Civic House, 110 Trafalgar Street, Nelson, or any of the Nelson Public Libraries. More information is available in all these locations, or you can phone 546 0200 to ask for it to be posted.

All submissions will be considered by Councillors before making a decision.

Anyone can make a submission. All submissions are publicly available, as required by the Local Government Act 2002. Submissions will be used only for the purposes of this consultation process.

Early submissions are appreciated, to help submission processing.

### Identify your submission

Please make sure you attach the cover sheet/submission form to any submission you make to assist in tracking submissions. Please number all the pages of your submission and put your name at the bottom of all pages. This will help if any become detached from your cover sheet. If you choose not to use this cover sheet, please include your name, address and contact telephone number. This is so we can contact submitters who wish to speak at the hearings, and so we can reply to you with the result of Council's deliberations on submissions.

### Make it readable

Type your submission if possible, or use black ink and write legibly on one side of paper only. This will ensure the photocopies we make of your submission will be easy to read.

### Separate headings

Divide your submission into separate points if you want to comment on more than one part, to help Council understand your submission better. For each point, say specifically to which part(s) your submission relates. Say concisely what your concern is OR what you support. Tell us the reasons why you support or oppose this part, and say how you want the Council to respond to your submission.

Send your  
submission to: Freepost 76919  
Consultation  
Nelson City Council  
PO Box 645  
Nelson 7040

or deliver to: Civic House, ground  
floor  
110 Trafalgar Street,  
Nelson

or: any Nelson Public  
Library

or: By email to  
[enquiry@ncc.govt.nz](mailto:enquiry@ncc.govt.nz)





Submission to Nelson District Council on the Statement of  
proposal Gambling Policy Review

June 2013



## Executive Summary

Our submission outlines The Lion Foundation's response to the Nelson City Council Statement of Proposal Gambling Policy Review, as it relates to Class 4 Gaming Machines and Venues.

The Council's proposal is to adopt a sinking lid policy, with no option for venues to relocate under any circumstances.

In summary, the submission from The Lion Foundation is that the Council:

- **Maintain the existing policy of a cap of 285 gaming machines; and**
- **Ensure that venue operators are able to relocate gaming venues where a venue can no longer operate at a site due to circumstances beyond the control of the operator or lessee.**

We oppose a move to a sinking lid policy:

- **It is taking a blunt instrument to the problem gambling harm issue with arbitrary consequences to the level of available community funds.** We consider a more sophisticated suite of policy tools needs to be developed so there is a better way of balancing the need to maintain the level of community funding, supporting business and reducing the incidence of people seeking help for problem gambling.
- **There is no evidence that a reduction in venues or machines results in a reduction in problem gambling.** In fact evidence to date shows there is no correlation between the number of machines and the prevalence of people seeking help from problem gambling. As a result, an arbitrary sinking lid policy of itself is unlikely to reduce the incidence of problem gambling.
- **There is limited understanding of the impact on community funding levels** arising from the closure of any particular venue as a result of the withdrawal of gaming machines under the sinking lid policy.
- **A sinking lid policy will discourage hospitality operators establishing new businesses, and will also lead to job losses within the hospitality industry.** In the right environment, gaming is a key component of a total entertainment package offered to the Nelson community by the hospitality industry.

We support the continuation of the existing "cap" policy, in conjunction of the ability of venue operators to relocate their venue/s:

- **The continuation of a cap (presently set at 285) on machine numbers will safeguard against any increase in the incidence of**

**problem gambling.** If operators can relocate their gaming rooms they will be able to maintain the levels of funding that are currently in place in the area.

- **We fully support harm minimisation measures that assist in reducing gambling harm.** We have robust systems in place to minimise the harm caused by gambling and there is a high level of funding from the sector to support problem gamblers. We believe focusing on making these measures more effective is a better way of dealing with the issue of gambling harm than imposing a policy that will have the inevitable result of reducing funding to the community.

## **Introduction to The Lion Foundation**

- The Lion Foundation is New Zealand's largest gaming society by venues, machine numbers and money returned to the community through grants. We operate over 2,500 gaming machines in nearly 200 venues across New Zealand.
- We seek to return 80% to 90% of funds back to the community of origin (where the funds were generated), with the remainder going to important national causes such as St John Ambulance, Coastguard, Plunket, Surf Lifesaving and many others. These national funds are usually spent providing services to regional areas or supporting projects implemented at regional level.
- Formed in 1985, we have given back over \$645m in grants to regional and national community causes since our inception and over \$45m in our 2012/2013 financial year, representing over 40% of gross machine revenue.
- We are a broad based funder, that is, we fund a wide range of organisations across all community groups. Our policy prescribes that our grants are committed to the following community sectors:

Sport	40%
Community	30%
Health	15%
Education	15%
- Our aim is to be New Zealand's leading charitable trust, nationally recognised and respected for helping people achieve great things in the community.

### **The Lion Foundation in Nelson**

The Lion Foundation is the largest gaming trust operating in the Nelson District with 67 gaming machines in operation in 5 venues. Our machines operate at the Wakatu Hotel, Molly's Sports Bar & Club, 623 in the City, 623 on the Rocks, and Hangar 58.

### **Grants**

For the financial years 2007/2008 to 2012/2013, the total sum of grants to the Nelson area is over \$14.2m.

In the 12 months from April 2012-March 2013, The Lion Foundation has given around 80 grants to local and national groups operating in the Nelson area, comprising a total value of over \$3.6m.

A full list of the grants given to groups and organisations in Nelson is included as an appendix to this submission.

### **Discussion of the Nelson City Council Proposal**

Our stance is that decisions made at council level cannot be completely separated from what is happening at a national level within the Class 4 Gaming sector.

With the Gambling Harm Reduction Bill report released on 18 June, we believe the measures that will be introduced will mark a significant step forward in the evolution of the sector that is in the best interests of the community and for a trust like the Lion Foundation. Until the Bill is implemented in law, the responsible approach would be to maintain the status quo as a cap on current machine numbers, as potential changes may impact on machine and venue numbers irrespective of council policy.

### ***The Value of Gaming to Community Funding***

There is a significant reliance on gaming trusts for community funding. Research undertaken by Auckland Council<sup>1</sup> for their gambling policy review clearly demonstrates the reliance on gaming funds to support community causes. A total of 990 grant recipients were contacted and 192 completed an on-line survey. One of the key findings from the research is that 75% of respondents indicated their organisation is moderately or totally reliant on this source of funding. Over two-thirds (68%) thought they would be unlikely to find another source of funding if gaming funding was unavailable.

A recent study undertaken by Massey University<sup>2</sup> concluded:

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

<sup>2</sup> The impact of grant funding on communities in NZ: A case study, Massey University March 2013

"...Foundation funding is having a significant impact on the social well-being in NZ with every New Zealander being served 2.75 times directly and 12.7 times indirectly by organisations funded by the Foundation. Therefore should funding cease or be reduced, the ongoing existence of organisations delivering outcomes will be severely impacted, leading to a detrimental outcome on the social well-being of NZ communities."

"Evidence shows that recipients of Foundation grants are collectively assisting NZ with the shortfalls in community needs... the benefits are potentially having a much wider impact than what organisations are giving themselves credit for."

A sinking lid policy will have a marked impact on community funding infrastructure and will increase the demand for funding from other local sources.

Over time a sinking lid policy can only have the effect of eliminating gaming machines altogether. This is not a responsible decision by council given the reliance on gaming funds from community groups.

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.<sup>3</sup> 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 impact of a sinking lid approach is likely to be twofold – a disincentive for the hospitality industry to invest in new premises, and an ongoing decline in funds available for distribution to the community.

If a sinking lid policy were to be the favoured option for council, we strongly recommend that council allow existing venues to relocate to a new site in certain circumstances. These circumstances could be defined in the Gambling Policy and might include public works acquisition, site redevelopment, destruction or damage to existing premises (fire, earthquake etc.) lease termination as examples. In all cases adequate evidence would need to be provided to council as proof the existing premises were no longer to operate gaming machines, for example a declaration from the landlord, copy of resource consent to redevelop a site for a completely different purpose etc.

There is no evidence that a reduction in venues or gaming machines results in a reduction in problem gambling. Numerous studies into problem gambling rates over a number of years, and against a backdrop of an increase, then steady decline of gaming machine numbers, show the prevalence of problem gambling

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<sup>3</sup> Berl Report: Maximising the Benefits to Communities from New Zealand's Community Gaming Model

is low and bears no correlation with any change in the number of gaming venues and machines.

The majority of gamblers are recreational gamblers with only a very small proportion at risk of problem gambling. The prevalence of problem gambling is low and has dropped from a rate of 0.4% of the adult population in 2006/7 to 0.3% in 2011/12, as per the following table<sup>4</sup>.

Problem gambling level	2006/07	2011/12
No gambling	34.9%	47.9%
Recreational gambling	59.9%	49.0%
Low-risk gambling	3.5%	1.8%
Moderate-risk gambling	1.3%	1.0%
Problem gambling	0.4%	0.3%

Problem gambling rates bear no correlation with any change in the number of gaming venues and machines. As a result, an arbitrary sinking lid policy of itself is unlikely to reduce the incidence of problem gambling.

The policy also 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.

We consider that maintaining the current cap of 285 machines is an appropriate policy that will maintain community funding, support local business while being cognisant of the harm caused by gambling. That ratio could possibly be set at a slightly lower rate than is currently in place, thus ensuring only limited growth in machines or venues is possible, but maintaining the funding levels to the community that are currently in place.

#### **Gaming Machine and venue numbers**

- 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 17,542 machines as at 31 March 2013.<sup>5</sup>
- The reduction over the past 3 years has been across most territorial authorities throughout New Zealand, with total Class 4 venue numbers

<sup>4</sup> Problem Gambling in New Zealand, preliminary findings from the NZ Health Survey, Ministry of Health, August 2012

<sup>5</sup> Department of Internal Affairs website

falling from 1,491 to 1,367, and gaming machine numbers falling from 19,359 to 17,542, a decline of 8.3% and 9.4% respectively.

### Gambling Participation

There have been significant changes in gambling participation levels over the 5 year period between 2006/07 and 2011/12, as reported by the Ministry of Health National Health Survey<sup>6</sup>.

Some of the key findings are as follows:

- The proportion of New Zealanders taking part in gambling declined between 2006/07 and 2011/12 from 65.1% to 52.1%.
- The biggest decline was among Maori, from 71.6% to 53.3%.
- The prevalence of problem gambling declined between 2006/07 and 2011/12 from 0.4% to 0.3% of the total population.
- The prevalence of gambling by type has changed significantly with a big drop in the percentage of the population engaging in certain gambling types. Of relevance, gaming machines in pubs and clubs has dropped from 10.3% to 6.1% which may well reflect the decline and therefore availability of gaming machines.

### Gambling Expenditure

Although there is a long term decline in gambling participation, the latest statistics from the Department of Internal Affairs show total gambling expenditure (expenditure = turnover less prizes) in the 2012 year has increased from the prior 12 months driven by increases in all forms except Gaming Machines (Class 4)<sup>7</sup>.

The breakdown by form of gambling is as follows:

	2012	2011	Change
NZ Racing Board	\$286m	\$273m	+4.8%
Lotteries	\$419m	\$404m	+3.7%
Gaming Machines (Class 4)	\$854m	\$856m	-0.2%
Casino	\$509m	\$471m	+8%

<sup>6</sup> Problem Gambling in New Zealand, preliminary findings from the NZ Health Survey, Ministry of Health, August 2012

<sup>7</sup> Department of Internal Affairs website



- 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.

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 Nigel Murray-Brown at The Lion Foundation on (021) 380 444 or Email: [nigel.murray-brown@lionfoundation.org.nz](mailto:nigel.murray-brown@lionfoundation.org.nz)*



## Appendix

The Lion Foundation grants to the Nelson area: April 2012-March 2013

Abbeyfield NZ Inc.	\$5,000
Adult Learning Support Nelson Inc.	\$8,000
Alzheimers Soc Nelson Inc.	\$4,000
Amputee Soc of Nelson & Marlborough Inc.	\$1,500
Athletics Nelson Inc.	\$8,000
Auckland Point School	\$4,800
Autism NZ Inc. - Nelson/Marlborough	\$1,400
Bowls Tahunanui Inc.	\$3,000
Canteen - Nelson Branch	\$5,000
CCS Disability Action Nelson Marlborough Inc.	\$15,000
Central Districts Cricket Assn. Inc.	\$5,000
Chamber Music NZ Trust	\$5,000
Citizens Advice Bureau - Nelson Tasman Inc.	\$2,000
Club 24 Inc.	\$2,000
Enner Glynn Playcentre	\$800
Faith & Light Living Waters Community Nelson Inc.	\$3,500
Garin College	\$2,848
Hearing Assn. Nelson Inc.	\$250
Inclusive Sport Trust	\$2,975
Life Education Trust Nelson - Tasman	\$10,000
Lifeline Nelson Inc.	\$2,000
Marist Rugby Football Club Nelson Inc.	\$40,000
Motueka Cricket Club Inc.	\$10,000
NDFKA - Brook Kindergarten	\$3,000
NZ String Quartet Trust	\$2,000
Nelson Asthma Soc Inc.	\$3,000
Nelson Badminton Assn. Inc.	\$5,000
Nelson Bays Football Inc.	\$10,000
Nelson Bays Volleyball Assn.	\$14,000
Nelson Bays Youth Teams Racing Assn. Inc.	\$3,000
Nelson City Council	\$3,250
Nelson College for Girls	\$8,684
Nelson College Old Boys Assn. Inc.	\$2,500
Nelson Cricket Assn. Inc.	\$12,000
Nelson Environment Centre	\$5,000
Nelson Golf Club Inc.	\$5,000
Nelson Historic Theatre Trust	\$3,600
Nelson Marlborough Axemen's Centre Inc.	\$1,000
Nelson Marlborough Rescue Helicopter Trust Inc.	\$5,000
Nelson Music Festival Trust	\$5,000
Nelson Playcentres Assn. Inc. - Victory Playcentre	\$591

Nelson Region Hospice Trust	\$6,000
Nelson Rugby Football Club Inc.	\$11,275
Nelson Santa Parade Trust Inc.	\$2,500
Nelson Savage Club Inc.	\$2,315
Nelson Softball Assn. 2008 Inc.	\$8,000
Nelson South Swimming Club Inc.	\$10,000
Nelson Triathlon & Multisport Club Inc.	\$1,800
Nelson Volunteer Coastguard In.	\$10,000
Off Your Rockers Choir Inc.	\$1,520
Parent to Parent NZ Inc. - Nelson	\$3,000
Richmond Croquet Club	\$900
Richmond Group Riding For the Disabled Inc.	\$3,939
Rutherford Street Kindergarten Inc.	\$679
Sexual abuse, Support & Healing (SASH - Nelson) Nelson Inc.	\$6,000
SLD Nelson Inc.	\$275
Soccer Nelson Inc.	\$4,000
Softball Mainland Inc.	\$1,000
South Island Secondary Schools Netball Assn. Inc.	\$2,000
Southern Coaches & Officials Assn. Inc.	\$6,000
Special Olympics NZ - Upper South Island Regional Council	\$1,250
Sport Fishing For Youth	\$2,844
Stoke Bowling Club Inc.	\$1,500
Stoke School	\$12,900
Stoke Sports Club Inc.	\$5,000
Swimming Nelson Marlborough Inc.	\$3,000
Tasman Rugby Union Inc.	\$30,000
Tasman Volleyball Assn. Inc.	\$10,000
Te Tauihu o te Waka a Maui Maori Cultural Council	\$1,500
Te Whatukura	\$3,500
Village Theatre Soc	\$10,000
Volunteer Nelson Inc.	\$2,500
Waimai Hockey Club Inc.	\$1,500
Waimea Amateur Swimming Club	\$2,000
Waimea Intermediate School	\$8,000
Waimea Volleyball Club Inc.	\$3,000
Whakatu Marae Committee Inc.	\$5,000
Whakatu te Korowai Manaakitanga Trust	\$6,000
Wheelchair Basketball NZ Inc.	\$3,000
Woodlands Centre Charitable Trust Inc.	\$8,840



# Nelson Marlborough District Health Board

## **Submission on Nelson City Council Statement of Proposal to its Gambling Policy 2013**

**July 2013**

For more information please contact:

Hilary Genet

Public Health Service

NMDHB

Email: [hilary.genet@nmdhb.govt.nz](mailto:hilary.genet@nmdhb.govt.nz)

Phone: 03 5461545

Nelson Marlborough District Health Board (NMDHB)'s role is to enhance the health and well-being of the people of Te Tau Ihu. NMDHB appreciates the opportunity to comment on the Nelson City Council (NCC) Statement of proposal to its Gaming Strategy 2013. NCC, through the development of a robust Gaming Policy, has a vital role in enhancing and supporting the wellbeing of all people in Nelson.

Our submission is based on the understanding that, except for the two changes proposed, the NCC Gambling Policy 2007 will be retained in its current form.

**1. The proposal to introduce a 'sinking lid' to class 4 gambling 'pokie' venues**

The NMDHB is supportive of this proposal. Research has confirmed that increased availability and accessibility to gambling products, in particular the availability and accessibility of gaming (aka pokie) machines leads to an increase in prevalence of problem gambling (1, 2, 3 ).

Harm resulting from problem gambling extends well beyond problem gamblers and can persist for many years after the problematic gambling behaviour stops. (4)

Money for gambling is diverted from savings and/or other expenditure and can have a negative impact on local business and the economic health and welfare of communities. (4)

Non-casino gaming machines were cited by more new gambling clients as their problem at face to face intervention services provided by health services (4), and significantly more first time callers to the Gambling Helpline also identified pub gaming machines as their problem.(5)

Physical health is reported to be worse amongst problem gamblers, particularly those who spend longer periods of time gambling on gaming machines (6)

**2. The proposal to separate the current Gaming Policy into two separate policies, one for Class 4 gambling venues and a separate one for New Zealand Racing Board ( TAB) venues**

The New Zealand Racing Board and societies that are racing clubs under the Racing Act 2003 are included under the Gambling Act 2003 and are registered class 4 venues. We submit that there is no advantage in separating the current policy into two separate policies.

**3. The proposal to retain the existing NCC Gambling Policy except for the items identified above.**

The NMDHB supports the proposal to retain the existing, 2007 NCC Gaming Policy

**Bibliography**

1) Orme, C. (2008). *Problem Gambling: The Hidden Disorder*. Mindnet: Mental Health Foundation of New Zealand. <http://www.mentalhealth.org.nz/newsletters/view/article/4/33/>

2) Abbott, M. (2001). *What Do We Know About Gambling and Problem Gambling in New Zealand?* The Department of Internal Affairs: Wellington

3) Department of Internal Affairs. (2009). *Problem Gambling in New Zealand – A Brief Summary*. [http://www.dia.govt.nz/diawebsite.nsf/wpg\\_URL/Services-Casino-and-Non-Casino-Gaming-Problem-Gambling-in-New-Zealand-A-Brief-Summary?OpenDocument](http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Services-Casino-and-Non-Casino-Gaming-Problem-Gambling-in-New-Zealand-A-Brief-Summary?OpenDocument)

4) Problem Gambling Foundation in NZ. (2012) *Green Paper for Vulnerable Children 28 February 2012*. <http://www.msd.govt.nz/documents/about-msd-and-our-work/work-programmes/policy-development/green-paper-vulnerable-children/submissions/problem-gambling-foundation.pdf>

5) Ministry of Health ( 2011) *Gambling Helpline New Zealand Report for National Statistics to 31 December 2011*

6) Thorn H et al ( 2012) *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*. Gambling and Addictions Research Centre, Auckland University of Technology.

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Submission to Nelson Council - gambling policy review  
**Date:** Monday, 8 July 2013 7:40:33 a.m.  
**Attachments:** [Submission re Nelson Council Gambling Policy Review.pdf](#)

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**From:** Jane McLeod on behalf of Council Enquiries (Inquiry)  
**Sent:** Monday, July 08, 2013 7:40:30 AM  
**To:** Submissions  
**Subject:** FW: Submission to Nelson Council - gambling policy review  
**Auto forwarded by a Rule**

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**From:** Kimberley Waters [mailto:kimberleyb@canteen.org.nz]  
**Sent:** Friday, 5 July 2013 5:46 p.m.  
**To:** Council Enquiries (Enquiry)  
**Subject:** Submission to Nelson Council – gambling policy review

Hi there,

Thank you for the opportunity to have say on the proposed changes to the Nelson Council's Gambling Policy, in particular the 'sinking lid' option. Please find attached our submission.

If there is any additional paperwork to be completed or a different process in which we should have followed to submit this, please advise.

Warm Regards, Kimberley



**Kimberley Waters**  
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e. [info@canteen.org.nz](mailto:info@canteen.org.nz)

5<sup>th</sup> July 2013

Gambling Policy Review Submissions

Nelson City Council

PO Box 645

Nelson

Kia Ora,

**Subject: Submission to Nelson Council – gambling policy review**

This submission is written on behalf of CanTeen New Zealand and is endorsed and co-signed by CanTeen's National President and Chief Executive. CanTeen New Zealand is a nationally linked and regionally focused charitable organisation that receives funding from non-casino gaming machines.

Non-casino gaming machine grant funding supports our organisation in providing psycho-social support services, development opportunities and empowerment for our members – 13 to 24 year olds living with cancer as patients, siblings and bereaved siblings. Without this funding CanTeen would not be able to provide the level of support our members and their families need. Over 60 members living across Nelson and their families all benefit from the current community funding model.

The money that the machines generate for CanTeen is vastly important. We are the only organisation in the Nelson community that is dedicated to supporting young people living with cancer and without this money our service delivery would be severely affected. Currently non-casino gaming machine grant income equates to approximately \$10,000 to \$12,000 per annum or up to 25% of CanTeen Nelson's total annual income. We see on a daily basis the huge benefits this essential community funding stream provides to our members and community.

Non-Casino gaming machine grant income helps fund a number of CanTeen Nelson's key operational costs such as rent, utilities, phone/internet and other essential daily operating costs. Non-Casino gaming machine grant income also helps to fund our psycho-social service delivery, including contributing to the costs of our key Youth Worker driven support services as well as development, education and training programmes, resources, peer support and many other opportunities that young people living with cancer benefit from.

Whilst we aspire towards self-sufficiency by undertaking our own fundraising efforts, the money raised through these efforts does not meet all our budget demands and we still rely on the support of charitable non-casino gaming trusts to ensure we can continue to deliver the level of service and support young people living with cancer need.



➤ @CanTeenNZ #CanTeenNZ

[canteen.org.nz](http://canteen.org.nz)

As an organisation that benefits from this funding we oppose the intent of this policy because we do not think enough consideration has been made into the implications that this policy will have on community groups, nor do we think this is the only way to solve the issue of problem gambling in our community.

Gaming machines have been in pubs and clubs in Nelson for a long time. Most people play machines without any problems. Research indicates that only 2% of all gamblers are recognised as problem gamblers. While we understand and sympathise with the severity of problem gambling we do not feel this sinking lid policy proposal addresses this social issue. By removing non-casino gaming machines, problem gamblers could be pushed into gambling practices that are not as safe, such as online and potentially even illegal gambling.

Whilst we appreciate that the current policy might need to be changed to make sure that the issue of problem gambling is addressed, we do not support the current proposed policy changes around non-casino gaming machines as we feel the proposal does not address the issue of problem gambling nor identify a solution to the significant reduction in community funding available for essential services such as CanTeen.

Thank you for the opportunity to voice our concerns as a community organisation who will be significantly impacted by policy change.

Yours sincerely



Guy Alexander  
President and Patient Member



David Pearce  
Chief Executive





**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Submission to Gaming Policy Review  
**Date:** Monday, 8 July 2013 9:35:11 a.m.  
**Attachments:** [Submission.pdf](#)

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**From:** Sheryl Skinner on behalf of Council Enquiries (Inquiry)  
**Sent:** Monday, July 08, 2013 9:35:08 AM  
**To:** Submissions  
**Subject:** FW: Submission to Gaming Policy Review  
**Auto forwarded by a Rule**

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**From:** Jackie Gurden [mailto:[jgurden@xtra.co.nz](mailto:jgurden@xtra.co.nz)]  
**Sent:** Monday, 8 July 2013 9:32 a.m.  
**To:** Council Enquiries (Enquiry)  
**Subject:** Submission to Gaming Policy Review

Managing Director  
Gurden Consulting Ltd  
PO Box 499  
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027 420 0491

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## Submission to: Nelson City Council Gaming Policy Review

From: Jackie Gurden 15 Weenink Rd Greymouth ph 027 420 0491

Organisation Represented: Self

I do not wish to be heard in support of my submission.

I would like to make the following submission to the Nelson City Council Gaming Policy Review.

*I am concerned from the information I have read in relation to this policy that consideration does not appear to have been fully given to the negative impact of reducing the number of gaming machines and therefore the funding gaming invests back into the community. A further factor is the behaviour of gamblers and if in fact a reduction in machines will reduce gambling or simply lead to a redistribution of those who are addicted to machines in other areas.*

*In today's economy, community funding through both private and public sectors is increasingly difficult to obtain. The Christchurch earthquake recovery has placed further pressure on the level of funding available.*

*Many community and sporting groups now rely on gaming trust funds to help finance their services and activities. These funds are also critical to assist with financing of major community infrastructure projects. In some cases in projects I have been involved with, up to \$1M has been obtained from gaming trusts. Without this funding these project would not have been possible. While my experiences are largely West Coast based, I expect the situation is similar in Nelson.*

*If Nelson City Council adopts the sinking lid policy this type of community funding will be reduced and many community groups and projects will struggle.*

*In considering this policy I strongly encourage the Nelson City Council to consider comprehensively and independently the number of groups, projects and positive impact of gaming trusts and whether or not reducing the number of machines from that currently in operation will in fact address the issue of gambling. I expect the negative impact of such a move would be far greater than is currently recognised and that the retention of the current level of gaming has a significant positive benefit to the community and further, that the sinking lid policy should not be adopted.*

Jackie Gurden



8 July 2013

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Gambling Submission attached  
**Date:** Monday, 8 July 2013 11:02:08 a.m.  
**Attachments:** [Gambling Submission to NCC.pdf](#)

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**From:** Jane McLeod on behalf of Council Enquiries (Inquiry)  
**Sent:** Monday, July 08, 2013 11:02:06 AM  
**To:** Submissions  
**Subject:** FW: Gambling Submission attached  
**Auto forwarded by a Rule**

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**From:** Steve Fitchett [mailto:[FI@nelsoncollege.school.nz](mailto:FI@nelsoncollege.school.nz)]  
**Sent:** Monday, 8 July 2013 10:53 a.m.  
**To:** Council Enquiries (Enquiry)  
**Subject:** Gambling Submission attached

Many thanks

S Fitchett

The Nelson City Council wants your opinion. Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number	
File Ref		INITIALS	

Name Stephen G Fitchett

Daytime phone 021 547 347

Address 126 Nayland Rd, Nelson

Organisation represented (if applicable) Individual

Do you wish to be heard in support of your submission?  YES  NO # of pages 4

*If you do not tick a box we will assume you do not wish to be heard.*

**Public information**

*Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.*

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

Attached

Date 8/7/13

Signature

*Help with making a submission overleaf...*



**Nelson City Council**  
te kaunihera o whakatū

PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

A submission to the NCC Gambling Policy Review  
[This submission is four pages including this page]

**From:**

Steve Fitchett

I do not wish to present this in person.

**Contact:**

Mail: 126 Nayland Road, Nelson

Ph: 021547347

**Who am I?**

I am an individual who fills many and varied roles in Nelson. These roles presently or recently include:

**Employment:**

- Resource Manager, Nelson College
- Accounting Teacher, Nelson College

**Volunteer:**

- Teacher in Charge of Basketball, Nelson College for 23 years
- Coach and/or Manager of a numerous sporting teams [basketball and rugby] both secondary school and representative for 38 years
- Patron of the Nelson Basketball Association Inc
- Director of the Fico Finance Nelson Giants Ltd
- Board Member of the NZ National Basketball League Ltd
- Deputy Chairman of the Saxton Field Stadium Society Inc
- Chair of the Saxton Stadium Building Committee
- Member Saxton Field User Group

**Parent:**

- A parent of three children, two of whom have represented NZ

I wish to make a submission against the Proposed NCC Gambling Policy, specifically:

## **The Proposal to operate a 'sinking lid' policy in Nelson**

The existing NELSON CITY COUNCIL GAMBLING POLICY has one objective:

To support and promote harm minimisation principles for gaming activities within the Nelson City area

The new Proposed Policy seems to change this objective to:

"minimise the potential for problem gambling by reducing over time the number of pokie venues and machines in Nelson." [Gambling policy review NCC]

The word 'potential' seems to be the justification to move from the existing 'capped' approach to the new 'sinking lid' approach in relation to the number of machines.

Should this change to a 'sinking lid' on the number of machines be adopted Nelson and the Nelson community will be the losers.

A decrease in the number of machines will ultimately decrease the amount of trust funding available in Nelson. This will not be good for Nelson and Nelsonians.

- Without gaming funding the majority of community organisations and educational institutions will face financial difficulty
- Without gaming funding community organisations will not be able to continue to do the great work they presently do
- Without gaming funding community organisations will not be able to offer the community the facilities, resources and support they currently do
- Without gaming funding schools will not be able to offer the facilities and resources they currently do
- Without gaming funding the NCC will need to spend more to provide community facilities

## **Trust funding enables things to happen in Nelson?**

The Nelson community relies on trust funding to enable many activities to take place and community facilities to be built. Basically trust funding makes things possible.

For all my 'employment' and 'volunteer' activities, including 'teaching', trust funding is vital in enabling these jobs and/or activities to take place and new facilities to be built.

Nelson is a smaller centre distant from other areas of NZ. This distance makes it very expensive for people in Nelson to participate in cultural and sporting activities elsewhere in NZ.

In my job as the Resource Manager at Nelson College I am responsible for many funding requests that enable school co-curricula activities to take place – Kapa Haka,

S Fitchett:

Submission to the Gambling Policy Review

sports groups, drama and music groups, etc all depend on trust funding. Nelson College is not a 'rich' school [decile 7] and without trust funding the pupils will miss out on opportunities to grow and develop as the costs of participating will become too great. The expression "a child in sport stays out of court" is almost always true. It applies equally to cultural activities. I have seen many 'problem' students from lower socio-economic families turn their lives around due to opportunities made possible by trust funding.

The Trusts have also granted large sums of money that has made the building of the college's new Trade Centre and the Whare [Te Ara Poutama] possible. These buildings contribute greatly to the development of many boys in the college, in particular the boys from the lower socio economic areas of Nelson. These facilities are not funded in any way by the Ministry of Education but enable the college to offer the pupils much more opportunity in their studies and learning.

In 2012 Nelson College benefited by approximately \$150 000 from 'trust' grants. In the context of running schools – all of which rely on 'locally raised funds' – trust money is vital.

Trust funding is just as important to Regional and National Sporting Organisations enabling them to operate with lower affiliation fees and to offer a wider range of activities. Trust funding is vital to the Tasman Regional Sports Trust in providing resourcing enabling a wider range of community activities to be offered.

Many junior, school and regional level coaching and development programmes are made possible by trust funding. The 'Coachforce' coaches would be one example. The primary school 'Coaching in Schools Basketball Programme' is another. Much – possibly the majority - of sporting equipment belonging to regional sporting organisations, schools and clubs has funded by the trusts.

Children will miss out at the representative level without trust funding. The majority of parents are finding the travel costs associated with these activities are very prohibitive and this means that without trust funding players and participants will not be able to participate unless they come from a high socio-economic family.

The greatest legacy of trust funding in Nelson is possibly Saxton Field. In the last few years alone the trusts have poured millions of dollars into these facilities that will remain for the long term benefit of Nelson and Nelsonians. The netball, volleyball, table tennis, basketball, hockey, athletics, cricket, soccer and softball facilities have depended heavily on trust funding. As well as the facilities themselves the trusts have also often provided funding for the equipment required for the sports to operate.

As someone involved with the building of the Saxton Stadium from day one, I know this project would not have got off the ground, let alone been completed, without the large sums of money put in by one trust at the beginning to 'kick start' the project.

Community groups and regional sports bodies rely on trust funding to exist. Trust funding is used to cover the administration of the majority of these groups as well as staff training [community groups] and coaching [sports groups]. It enables these

groups to get on with the operation of their organisation rather than spend the majority of their time fundraising.

Trust funding is allocated locally. It supports the area it is raised in. Any decrease in trust funding available will have a serious effect on Nelson and Nelsonians. A decrease in trust funding will mean many of the activities and/or facilities provided by different organisations will decrease and/or vanish. It is not possible for the local authority to pick up the costs presently covered by trust funding.

Over the last few years trust funding has become harder and harder to get. This has already made it very hard to offer some activities. If there is a further decrease in trust funding more and more people will miss out on activities and new facilities will not be possible. The end result will be more idle and bored youth and adults, leading to an increasing social and fiscal cost to the community. These costs will far outweigh any present costs generated by gambling.

### **Why the present 'cap' should stay or expand**

The number of problem gamblers is actually very small. A reduction in the number of machines will not decrease the number of problem gamblers in Nelson.

Decreasing the number of machines, and therefore the ability to generate trust funding, will not stop people gambling – they will just move their gambling to another method such as the TAB, Lotto, Big Wednesday, etc. This may already be happening. Through my involvement in Basketball NZ, I am aware that TAB betting on basketball is up a huge amount despite there being a decrease in the games available to bet on. The funds from the TAB, Lotto, etc will not necessarily be allocated to Nelson as they will be part of a national fund. Nelson and Nelsonians will be the losers.

The gaming machines fulfil a recreational need for a sector of the population. The population of Nelson is increasing. The recreational demand for machines, and the subsequent funding generated, will also increase. The recreational and funding benefits to Nelson and Nelsonians are so great there is a need to maintain – or increase - the present cap to satisfy the needs of this expanding population.

The NZ Government has granted the Skycity Casino an increase in their pokie machine numbers even though it has no control over where the extra income generated is spent. The Government believes the benefits of the expansion in machine numbers outweighs any increased in problem gambling. This seems to be in direct conflict with the NCC's justification in adopting a 'sinking lid' approach to the number of gaming machines.

Nelson and Nelsonians will be the losers.

I would ask that the NCC does not change to a 'sinking lid' policy.



**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Health Action Trust Submission on NCC 2013 Review of the Gambling Policy  
**Date:** Monday, 8 July 2013 11:25:48 a.m.  
**Attachments:** [Health Action Trust Submission on NCC 2013 Review of the Gambling Policy.pdf](#)

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**From:** Suzanne Bateup[SMTP:SUE@HEALTHACTION.ORG.NZ]  
**Sent:** Monday, July 08, 2013 11:25:42 AM  
**To:** Submissions  
**Subject:** Health Action Trust Submission on NCC 2013 Review of the Gambling Policy  
**Auto forwarded by a Rule**

Please find my submission attached,

Kind regards,

*Sue Bateup*

*Mental Health Promoter  
Health Action Trust Nelson*

**26 New Street, Nelson  
Tel: 03 5482798 ext 5  
Web: [www.healthaction.org.nz](http://www.healthaction.org.nz)**

**Health Action Trust**  
**Submission on the Nelson City Council**  
**2013 Review of the Gambling Policy**

8 July 2013

Name: Sue Bateup

Organisation: Health Action Trust Nelson

Address: 26 New Street, Nelson

Phone: 5482798 ext. 5

Email: [sue@healthaction.org.nz](mailto:sue@healthaction.org.nz)

I do want to speak to this submission.

I am writing this submission in my capacity as Mental Health Promoter at Health Action Trust, in particular regard to the mental health and wellbeing of older people in the Nelson community.

The council have invited submissions on the proposal to change the existing NCC Gambling Policy. I will confine my submission to the specific proposals for changes announced by the NCC on the understanding that except for these changes the NCC Gambling Policy will be the policy adopted in 2007, with the 2010 additions.

**1. The Proposal to institute a sinking lid on pokie venues**

I support this proposal and applaud the Council for taking this step. The New Zealand experience since the year 2000 shows that sinking lids do work and the disadvantages that have been attributed to them in fact do not occur.

Two arguments are commonly advanced against sinking lids policies:

- A) One is that the reduction in machine numbers that a sinking lid would cause will result in less money coming back to the community. This is incorrect as Nelson should expect a greater level of Pokie funding in the future even with a lower number of Pokie machines as a result of a sinking lid policy. The NZ evidence overall is that since 2006, although there has been a reduction in the number of Pokies and venues, the amount of money returned to community including sports that have professional arms and racing, has not dropped significantly. Over last two years and

most societies have implemented policies to return higher proportions of the total gamblers losses to the community in which they were collected. As these policies come into effect Nelson can expect to receive increased Pokie funding even if as the total dollar amount lost in this area decreases.

- B) The second argument against sinking lids is that Councils should maintain Pokie machine numbers, as in some way this protects people from gambling on internet pokies, casino games and poker which is even more harmful than Pokie gambling. While it is true that there is good evidence that internet gambling is more harmful than all other kinds of gambling, there are also good NZ prevalence studies that show that New Zealanders are not adopting internet gambling. Only 2% of New Zealanders gamble on the internet and this gambling is mainly the purchase of Lotto tickets (which are recognised as a low harm gambling mode) rather than the use of internet pokies, casino games and poker. This view is explicitly supported by the Ministry of Health who in their 2013-2016 Gambling Harm Minimisation Plan have stated that they do not see internet gambling as becoming a significant problem in NZ during this period.

**2. The proposal to limit the number of Pokies that merging Club venues can have to a maximum of 18.**

I support the reduction from 30 to 18 machines, but would like the sinking lid policy to extend into this area to the extent that if there is a merger of clubs, the total pokie machines at the merged venue do not add up to more than there were originally at the separate venues, even if this total is under 18 machines.

I have concerns for the mental health and wellbeing of older people in Nelson where gambling is easily available at venues such as the RSA and other clubs. These are important places for social connection for this age group. The risks of problem gambling for older adults are the same as those faced by younger gamblers—a sudden, devastating loss of financial security and accompanying legal troubles. But older adults with gambling problems also have unique risks. Reduced cognitive capacity among some older people can make it difficult for them to make sound decisions. Also, older adults living on a fixed income with limited savings can't necessarily afford the financial drain of a gambling disorder. Because of these issues, I fully support the sinking lid policy extending into this area.

3. **The proposal to separate the NCC Gambling Policy into two policies one for Class 4 gambling under the Gambling Act 2003 and a separate one to cover gambling under the Racing Act 2003.**

I disagree with this proposal as it is irrelevant to Nelson. Separating the Racing Act and Gambling Act into two policies would add complexity and confusion without having any practical advantage for Nelson.

4. **The proposal to retain the existing NCC Gambling Policy except for the items addressed above.**

I support the proposal to retain the existing 2007/10 NCC Gambling Policy with the addition of a sinking lid. The 2007/10 policy was developed with a robust consultative process that and this policy is currently working very well.

For further information about the risks for older people and gambling please see:

- McCready, J., Mann, R.E., Zhao, J. & Eves, R. (2008, June). Correlates of gambling-related problems among older adults in Ontario. *Journal of Gambling Issues*, (22). Retrieved from [http://www.problemgambling.ca/EN/Documents/FA\\_OntarioAdultsOlderAdults.pdf](http://www.problemgambling.ca/EN/Documents/FA_OntarioAdultsOlderAdults.pdf)
- Surface, D. (2009). High Risk Recreation — Problem Gambling In Older Adults. *Social Work Today*. Vol. 9 No. 2 P. 18. Retrieved from <http://www.socialworktoday.com/archive/031109p18.shtml>

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Consultation: Submission Gambling Policy  
**Date:** Monday, 8 July 2013 12:59:21 p.m.  
**Attachments:** [Nelson Submission pdf 2013.pdf](#)

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**From:** Sheryl Skinner on behalf of Council Enquiries (Inquiry)  
**Sent:** Monday, July 08, 2013 12:59:13 PM  
**To:** Submissions  
**Subject:** FW: Consultation: Submission Gambling Policy  
**Auto forwarded by a Rule**

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**From:** Graeme Ambler [<mailto:Graeme@pubcharity.org.nz>]  
**Sent:** Monday, 8 July 2013 12:46 p.m.  
**To:** Council Enquiries (Enquiry)  
**Subject:** Consultation: Submission Gambling Policy

Please find attached a submission from Pub Charity regarding the Gambling Policy Review  
Nelson City Council is presently undertaking.

Please advise if you have any issues with reading the attached document.

Regards

Graeme Ambler  
Donations Manager  
Pub Charity  
DDI: 04 382-4415 | M: 027 470 5049 | E: [graeme@pubcharity.org.nz](mailto:graeme@pubcharity.org.nz)



Level 2, 190 Taranaki Street  
PO Box 27 009, WELLINGTON 6141  
P: 04 385 6100 | F: 04 384 1630 | [www.pubcharity.org.nz](http://www.pubcharity.org.nz)

**Disclaimer** - The comments contained within this correspondence are those of the author and do not represent the Net Proceeds Committee of Pub Charity and in providing these comments is not legal advice nor should be seen or interpreted as comfort of future donation application success. It is not within the province of Pub Charity staff to make comments on the suitability or otherwise of any application or proposed application for a donation. The processing of applications in accordance with the requirements of the Gambling Act 2003 rests entirely with the Net Proceeds Committee.

*"If you think you are too small to be effective,  
you have never been in bed with a mosquito." – Betty Reese*



08 July 2013

Consultation  
 Nelson City Council  
 PO Box 645  
 Nelson 7040  
[enquiry@ncc.govt.nz](mailto:enquiry@ncc.govt.nz)

## Submission: Draft Class 4 Gambling and Racing Board Venue Policy

### Introduction

This submission is made by Pub Charity, a licenced Class 4 Gaming Machine Operator at 165 venues nationwide operating 1941 machines. Pub Charity deals with around 5,600 applications per year distributing around \$29M per annum in 3,675 donations throughout 58 Local Authorities in New Zealand.

#### Contact:

Graeme Ambler  
 Pub Charity  
 Level 2, 190 Taranaki Street, PO Box 27 009, Wellington 6141

Phone: 04 385 6100; 04 382 4429; DDI: 382 4415; Mobile: 027 470 5049;  
 Email: [graeme@pubcharity.org.nz](mailto:graeme@pubcharity.org.nz); Web Page: [www.pubcharity.org.nz](http://www.pubcharity.org.nz)

Pub Charity requests to speak about our submission at a Council hearing.

### Overview

Thank you for the opportunity to comment on the Nelson City Council proposed Class 4 Gambling Policy

Pub Charity operates machines at the following venues in your District:

Venue	Address	Number of Gaming Machines
Bush Tavern	87 Grove St	9
Post Boy Hotel	50 Gloucester St	18
Rattle & Hum	141 Bridge St	9
Star & Garter Tavern	252 Queen St	18
4/19		54/257

Pub Charity opposes the Councils proposal of a sinking lid gambling policy.

Pub Charity submits that a capped policy set at current levels of machines and venues be implemented.

Pub Charity submits that:

- Economic and social benefit from Class 4 gambling is far greater than the cost of gambling.
- Gambling is a valid and legal form of entertainment.
- Problem gambling, whilst serious for the individual, is not a significant national health issue.
- Class 4 gambling has robust systems and processes in place.
- Reducing machines and venues will not affect problem gambling prevalence rates.

### Summary

Pub Charity has a goal to provide 'Enduring Community benefit' achieved through ring fencing funds raised by local authority and giving priority to applications physically located to venues. Pub Charity distributes funds to a wide range of interest groups such as community, sport, emergency services, education, health, art and culture, not just one interest group.

Pub Charity supports the Council in its efforts to reach its long term goals specifically with emphasis on being socially balanced and economically prosperous.

Playing on pokies is a legal and legitimate entertainment enjoyed by 99.7% of the population who have no problem with gambling. Pub Charity considers that it assists the Council to reach its district goals through:

- Its contribution to the community's wellbeing as detailed in Appendix A: Donations to Nelson City for period Sept 2009 – May 2013.
- In addition, venues in Nelson have also contributed towards National organisations through donations as detailed in Appendix B: National Grants 01/10/20011 – 31/03/2013 considered by Pub Charity to provide benefit to the community of Nelson.
- Commercial operations at venues contributing to local GDP, employment and hospitality trade.

Pub Charity does not agree with options that reduce venues or machine numbers as evidence since 2004 explicitly shows that this action has no bearing on prevalence rates of problem gamblers. Picking on pokies simply places a burden on the charity sector reducing community wellbeing and increasing government (Central and Local) community funding obligations.

Gaming machines are just one form of gambling. Whilst gaming machine numbers and revenue has reduced over the last nine years, other forms of gambling revenue have increased at a national level. Gambling expenditure as a whole has remained reasonably constant with no change to problem gambling prevalence rates. This clearly shows that sinking lid policies that simply pick on one form of gambling don't have any impact in regard to the social impact of gambling as a whole.

Internet online gambling is of concern. It is internationally one of the highest growth industries and accessible through the mobile phone network. It is not monitored, it does not contribute to New Zealand society and it can be played behind closed doors away from support services.

Class 4 gambling operates under heavy regulations including host responsibility actions ranging from electronic monitoring of expenditure of players to training of staff at venues. In addition Pub Charity has its own harm minimisation policy.

Class 4 gambling contribute some \$13M to the total \$18.5M Problem Gambling levy paid to the Health Department to educate, undertake research and provide clinical services to problem gamblers. Pub Charity fully supports Problem Gambling clinical services. Problem Gambling is 'bad for business' and those identified are referred to clinical services.

Pub Charity believes that the existing political environment and resulting perception of the industry is unfounded. The evidence since 2004 is clear that picking on pokies doesn't control the growth of gambling or reduce prevalence rates of problem gambling. Whilst there is always room for improvement, the existing system is far from broken. Whilst Council is limited to regulation of venue location, venue numbers and machine numbers, it can also contribute through liaison direct to the Government Departments to ensure performance and regulatory accountability.

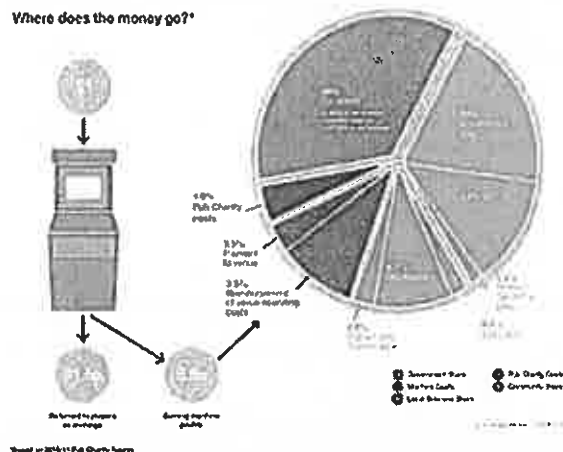
The moral dilemma that Council face is simple: To reduce gaming machines, forcing people to other forms of gambling; force gambling behind closed doors away from support services; regulate peoples freedom of choice; reduce community economic, social and cultural wellbeing; or not. Pub Charity submits that a capped figure of existing machines and venues is satisfactory regulation.



## Discussion

### A. Benefit Generated by the Pub & Club Gaming Industry

1. The Class 4 gambling sector is legally designed to provide a 'social dividend' to society. After its operating cost it contributes to Tax (roughly 1/3rd of GMP) and Community in the form of grants (a minimum of 1/3rd of GMP). By law, and enforced by the Department of Internal Affairs, 100% of funds generated are used to maximise community benefit. There are no shareholders to profit from proceeds only community stakeholders.
  - a. Class 4 Pub & Club Gaming pays highest Gambling Duty rate at 20%.<sup>1</sup>
  - b. A detailed graph describing where gaming funding goes follows. Information is taken from Pub Charity annual reports available on [www.pubcharity.org.nz](http://www.pubcharity.org.nz) and reflects typical gaming society expenditure.



2. Class 4 Pub & Club Gaming provides a simple, fast, independent and non-political funding stream that serves grass root community organisations efficiently and effectively.<sup>2</sup>
  - a. Access to funds is easy in comparison to other funders with simple forms and easy criteria. We are told by fundraisers that it takes minutes to organise an application to Pub Charity for a large value but months for the likes of Lotto at a very much less value.
  - b. At Pub Charity, meetings are held monthly (except December) to consider applications with payments made the week after decisions are made. This allows organisations to adapt to their changing environment and encourages innovation.
  - c. Our Net Proceeds Committee is not government appointed and therefore no hidden agendas or pre conceived community needs are involved in any decision. At Pub Charity we are proud of our Net Proceeds Committee robust decision making that takes into account not only the business case of the application but also includes local tacit knowledge of the decision makers who are resident throughout New Zealand. Each application must be agreed by three authorised signatures.
3. The cultural and economic leverage effect that grants to local organisations have upon the local economy has large flow on effects.
  - a. The charitable sector is very large contributing 105,000 paid employees and 4.9% to GDP<sup>3</sup>.

<sup>1</sup> Refer:

[http://www.gamblingcommission.govt.nz/GCwebsite.nsf/Files/ProblemGamblingIcvvReport12Annex2/\\$file/PGLAnnex22012.pdf](http://www.gamblingcommission.govt.nz/GCwebsite.nsf/Files/ProblemGamblingIcvvReport12Annex2/$file/PGLAnnex22012.pdf)

<sup>2</sup> Point Research (2012) Community Funding: A focus on gaming grants. Auckland Council.

<sup>3</sup> Retrieved 7 June 2013 from: <http://www.ocvs.govt.nz/news-and-updates/index.html/Nonprofitsasignificantanddiverseeconomicforcenbspeveninnbsprecession19>

- b. Many organisations claim that they could not deliver what they do deliver without gaming support. (75% of organisations are at risk of reduced capability if gaming sector funding reduces<sup>4</sup>).
  - c. Funds distributed enable other activity to happen so as an example should a sport tournament be funded in the area, this would attract not only local participation but also attract participation from outside the district, in effect maintaining domestic tourism.
    - i. Sport New Zealand report the sport sector alone is on par with the dairy industries contribution to the New Zealand economy<sup>5</sup>.
4. Gaming Machine funding of Charities is important to charities and significant to New Zealand economy contributing \$274.3M in 2011 and \$272M in 2006:

Total Giving		
Trust & Foundation	\$(M) 2011 <sup>6</sup>	\$(M) 2006 <sup>7</sup>
Voluntary		
Family & Individual	271.1	115.5
University	11.5	9.2
Statutory		
Community Trust	103.2	111.8
Energy	114.5	116.3
Licensing	3.7	6.3
Gaming	274.3	272.0
Lottery	192.2	110.9
Personal	1,546.2	442.7
Business & Corporate	150.8	89.1
<b>TOTAL</b>	<b>2,667.6</b>	<b>1,274</b>

5. Class 4 Gambling is one legal gambling ‘product’ enjoyed by the majority of the population who have no problems with gambling.

*“Estimates of people’s participation in gambling vary from survey to survey, depending on the date of the survey, its size and response rate, its methodology, what is considered a gambling activity, and how an adult is defined. Even so, some common findings emerge from all the research carried out in New Zealand (including Department of Internal Affairs 2008; Gray 2011; Health Sponsorship Council 2007; Ministry of Health 2009, 2012a). Key findings are:*

- Most adults in New Zealand gamble at least occasionally.
- However, only a minority participate in any gambling activity other than buying raffle tickets or buying New Zealand Lotteries Commission products.
- Differences among rates of participation in different gambling activities are more pronounced when the frequency of participation is considered.
- Participation rates appear to be declining for most forms of gambling (although, in some cases, expenditure may be increasing).<sup>8</sup>

6. Economic benefit is generated by venues through normal commercial practice. Gaming Machines form only one minority part of their business as per the Gambling Act 2003 and enforced by Department of Internal Affairs. On average 2.1 FTE are committed to gaming machines. Any policy that implies reduction of venues or machines increases the chance of employment redundancy from venues.
7. According to Local Government New Zealand, “The Gambling Act 2003 is designed to balance harm and benefit. Little to no research is available to describe the balance so how can local government make policy on something it has no evidence about.”<sup>9</sup>

<sup>4</sup> Point Research (2012) Community Funding: A focus on gaming grants. Auckland Council.

<sup>5</sup> SPARC,(2011) The economic and social value of sport and recreation to New Zealand: An overview. Wellington: SPARC p 1

<sup>6</sup> Slack, A, & Molano, W (2012) Giving New Zealand Philanthropic Funding 2011. Philanthropy NZ: Wellington

<sup>7</sup> Slack, A. & Leung-Wai, J (2007) Giving NZ Philanthropic Funding 2006. Philanthropy NZ: Wellington

<sup>8</sup> MoH (2013) Regulatory Impact Statement: Problem Gambling Levy for 2013/14 to 2015/16. Ministry of Health; Wellington. Retrieved 24/5/2013 from: <http://www.health.govt.nz/publication/preventing-and-minimising-gambling-harm-three-year-service-plan-and-levy-rates-2013-14-2015-16>

**B. Problem Gambling**

- 8. Problem gambling, even though significant to individuals involved, is not a significant national problem.
  - a. Problem gambling in New Zealand is the lowest in the western world. Ministry of Health report the following problem gambling risk levels:

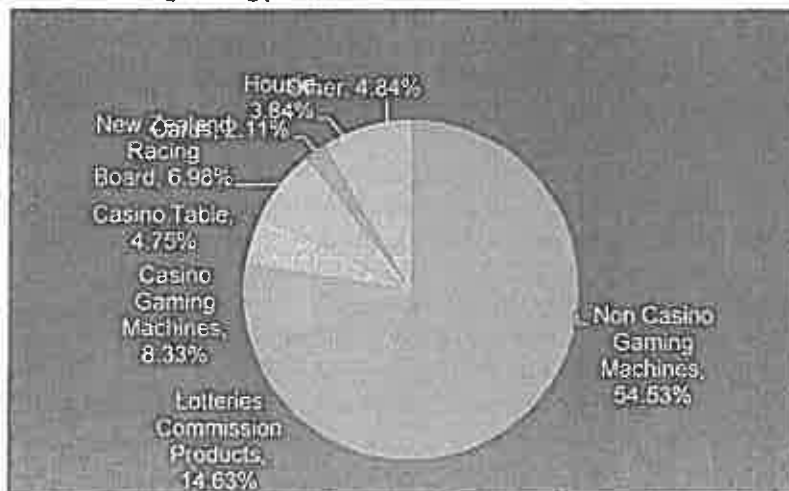
Problem Gambling Risk Level	2006/07	2011/12
No gambling	34.9	47.9
Recreational gambling	59.9	49.0
Low risk gambling	3.5	1.8
Moderate risk gambling	1.3	1.0
Problem gambling	0.4	0.3

Source 2006/07 NZHS, July 2011-March 2013 NZHS, preliminary findings

- b. You're 10 times more likely to have a serious car accident than seek problem gambling support.
- c. Statistics NZ state the Adult population of Nelson at 42,891<sup>10</sup>. The Ministry of Health records the following number of people have sought problem gambling assistance within Nelson:

Year	New Clients Assisted (Brief Intervention) <sup>11</sup>	All Clients Assisted (Brief Intervention) <sup>12</sup>
2005	54	71
2006	42	66
2007	40	67
2008	65	95
2009	57	106
2010	89	137
2011	59	108

- d. Primary gambling mode of new people presenting for Problem Gambling Intervention services (2010/2011) tell us that 54% of problem gamblers identify non-casino gaming machines and 45% other forms of gambling products.



Refer: [http://www.gamblingcommission.govt.nz/GC/website.nsf/Files/Problem Gambling Levy Report 12 Annex 22 file/PGIAnnex22012.pdf](http://www.gamblingcommission.govt.nz/GC/website.nsf/Files/Problem%20Gambling%20Levy%20Report12Annex22file/PGIAnnex22012.pdf) para 48-54

<sup>10</sup> Retrieved 7 June 2013 from: [http://www.stats.govt.nz/browse\\_for\\_stats/population/estimates\\_and\\_projections/SubnationalPopulationEstimates\\_HOTPYe30Jun12/Tables.aspx](http://www.stats.govt.nz/browse_for_stats/population/estimates_and_projections/SubnationalPopulationEstimates_HOTPYe30Jun12/Tables.aspx)

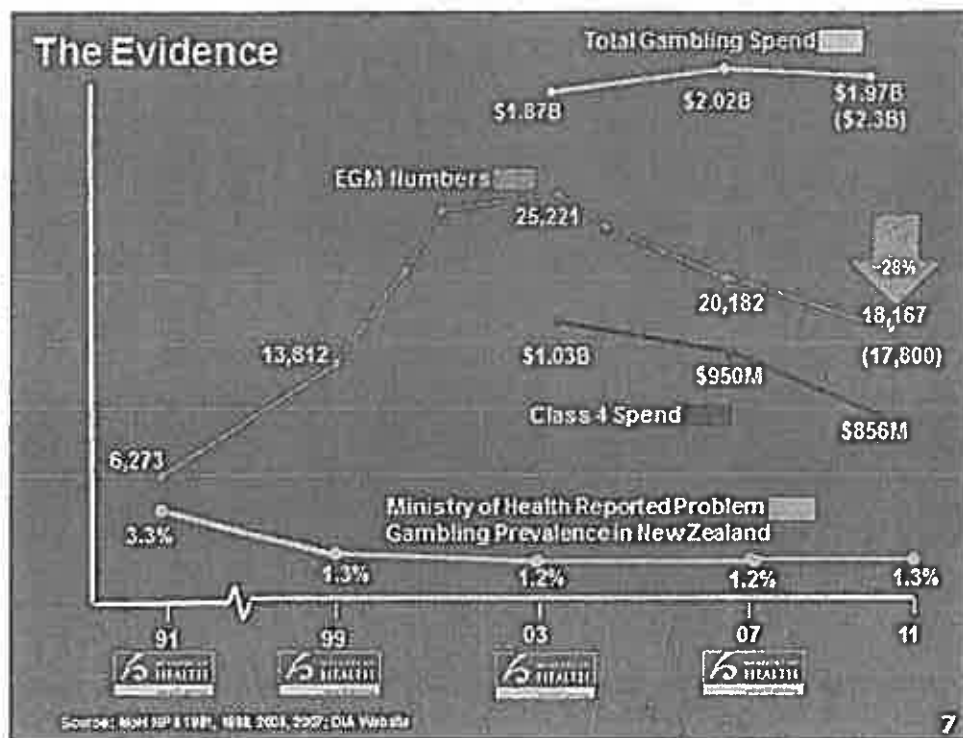
<sup>11</sup> MOH (2013) Table 10. Clients Assisted by Territorial Authority (Ex Brief Intervention type) Retrieved 24/5/2013 from: <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data#territorial>

<sup>12</sup> MOH (2013) Table 10. Clients Assisted by Territorial Authority (Ex Brief Intervention type) Retrieved 24/5/2013 from: <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data#territorial>

9. Class 4 contributes \$13M of the \$18.5M problem gambling levy used by Ministry of Health to contract education, research and clinical services to the problem gambling service provider sector.
  - a. An estimated \$8M is used for Clinical treatment.
  - b. "the unavailability at this stage of the systematic and comprehensive evidence on the effectiveness of the strategy that will become available through the outcomes monitoring and reporting framework over the 2013/14 to 2015/16 period"<sup>14</sup>. Is NZ getting value for money for what otherwise would be community money?
10. Problem Gamblers do not account for as much as 40% of expenditure on pokies as quoted by Green Party & Problem Gambling Foundation. AUT is quoting from an 'Australian Productivity report' which was discredited by the 'Australian Institute of Public Affairs' as:
  - a. "Advocates have used the Commission's data to justify their proposals, even though the data presented is subject to a host of important limitations rendering it inadmissible as a solid evidence base for policymaking."<sup>15</sup>
11. Problem gambling is taken seriously by Pub Charity. Pub Charity undertakes Venue staff training on Harm Minimisation. Its objective is to ensure problem gambling risk is eliminated or at the very least minimised. (see Appendix C – Harm Prevention and Minimisation Policy & Venue Check List).

**C. No Link To Problem Gambling**

12. In 2004, anti-gaming advocates told us less machines would mean less problem gamblers and control the growth of gambling. NZ has unwillingly declined in machine and venue numbers through a mix of regulation and natural attrition. Nine years later, Pub Charity calls for these anti gaming advocates to account because evidence shows they were wrong. And they were wrong at the community's expense.



<sup>13</sup> Source: Ministry of Health Website [http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total\\_assisted](http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data#total_assisted)

<sup>14</sup> MoH (2013) Regulatory Impact Statement: Problem Gambling Levy for 2013/14 to 2015/16. Ministry of Health: Wellington. Retrieved 24/5/2013 from: <http://www.health.govt.nz/publication/preventing-and-minimising-gambling-harm-three-year-service-plan-and-levy-rates-2013-14-2015-16> pii

<sup>15</sup> Novak, J & Wilson, T. (Oct 2011) Gambling away perspective: A review of the evidence justifying electronic gaming regulations.

13. All modes of gambling expenditure since 2008 has remained relatively constant

Reported Gambling Expenditure 2008 to 2012 <sup>16</sup> Actual dollars (non-inflation adjusted) for gambling operators' financial year-end.					
	2008 \$m	2009 \$m	2010 \$m	2011 \$m	2012 \$m
NZ RACING BOARD (TAB)	272.4	269.3	278.4	272.8	286.2
NZ LOTTERIES COMMISSION	346.0	403.8	346.6	404.5	418.7
GAMING MACHINES (outside Casinos)	938.3	889.1	849.2	856.2	854.0
CASINOS	476.9	465.4	453.9	471.4	509.3
TOTAL	2033.6	2027.5	1928.1	2004.9	2068.2

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

14. Picking on pokies has not made a difference to the prevalence rate of problem gambling.
- Problem gambling prevalence rates<sup>17</sup> have hardly changed with the decline in Class 4 gambling as above table (Problem Gambling Risk Levels) shows.
    - "Comparisons with the similar 2006/07 New Zealand Health Survey (Ministry of Health 2009), which also used the PGSI, indicate that the proportion of people who were problem gamblers did not change significantly between 2006/07 and 2011/12, but the proportions of people who were low-risk and moderate-risk gamblers decreased"*<sup>18</sup>
15. Other forms of gambling have grown or increased their market share of gambling expenditure.
- See above - Record gambling expenditure in 2011-12 as reported by Department of Internal Affairs
  - The gamblers buyer behaviour is such that if one gambling product is removed, they will spend it on another form of gambling. Just the same as any other consumer good buying behaviour. Consumers will always find a way around regulation to satisfy their need.
16. Online Internet Gambling growth is a threat to the industry over the next three years with reports indicating rapid international growth since 2004 and social media take up, e.g. Facebook. Problem Gambling Foundation report that this form of gambling is not monitored or well known.<sup>19</sup> One must ask why such an important aspect has been over looked by providers?

<sup>16</sup> Record gambling expenditure in 2011-12 reported by Department of Internal Affairs Retrieved May 2013 from: Source: [http://www.dia.govt.nz/diawebsite.nsf/wpg\\_URL/Resource-material-Information-We-Provide-Gaming-Statistics#two](http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Gaming-Statistics#two)

<sup>17</sup> DIA (2013) [http://www.dia.govt.nz/Pubforms.nsf/URL/LineGraph\\_31%20March%202013.pdf/\\$file/LineGraph\\_31%20March%202013.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/LineGraph_31%20March%202013.pdf/$file/LineGraph_31%20March%202013.pdf)

<sup>18</sup> MoH (2013) Regulatory Impact Statement: Problem Gambling Levy for 2013/14 to 2015/16. Ministry of Health; Wellington. Retrieved 24/5/2013 from: <http://www.health.govt.nz/publication/preventing-and-minimising-gambling-harm-three-year-service-plan-and-levy-rates-2013-14-2015-16> p5

<sup>19</sup> Gambling Commission (2012) Retrieved from: [http://www.gamblingcommission.govt.nz/GCwebsite.nsf/Files/ProblemGamblingLevyReport12Annex2/\\$file/PGLAnnex22012.pdf](http://www.gamblingcommission.govt.nz/GCwebsite.nsf/Files/ProblemGamblingLevyReport12Annex2/$file/PGLAnnex22012.pdf) para 81-84

**Appendix A:****Donations to Nelson City for period Sept 2009 – May 2013.**

<b>Applicant Name</b>	<b>Purpose</b>	<b>Donation</b>
Abbeyfield Nz Inc	Air Fares, Accommodation & Van Hire	\$ 4,500.00
Adult Learning Support Nelson Inc	Teaching resources, photocopy paper, digital camera	\$ 1,372.36
Adult Learning Support Nelson Inc	Software, projector, and phone	\$ 2,667.78
Age Concern Nelson Inc	Vehicle and painting building	\$ 2,783.00
Aikido Nelson	Training uniforms	\$ 1,110.95
Alzheimers Society Nelson Inc	Notebook Computers	\$ 1,335.30
Ashton Kilties Marching Team	Accommodation	\$ 1,800.00
Ashton Kilties Marching Team	Accommodation	\$ 1,950.00
Atawhai Playcentre	Laptops and cameras	\$ 2,133.33
Athletics Nelson Inc	National mountain running championship event expenses	\$ 3,992.12
Bishop Suter Art Gallery Trust Board	Folding chairs	\$ 1,633.00
Bishop Suter Art Gallery Trust Board	Art gallery bench seats	\$ 8,080.00
Bowls Nelson Inc	Laptop Growsafe Course & Renewal of Approved Handlers Certificate	\$ 1,643.00
Bowls Nelson Inc	Travel and accommodation	\$ 4,000.00
Brain Injury Assn (Nelson) Inc	Presentation costs	\$ 4,235.00
Bridge Valley Christian Trust	Waterproof mattress covers	\$ 5,000.00
Canteen Nelson/Marlborough	Wages, rent, telephone/internet costs and financial services	\$ 3,000.00
Casting For Recovery Nelson	Waders and boots	\$ 3,400.00
CCS Disability Action Nelson Marlborough Inc	Photocopier	\$ 7,550.00
CCS Disability Action Nelson Marlborough Inc	Office Furniture	\$ 2,951.91
CCS Disability Action Nelson Marlborough Inc	Wages and Administration costs	\$ 3,432.00
Celtic Flute School of NZ	Venue hire	\$ 1,000.00
Celtic Flute School of NZ	Venue hire	\$ 1,000.00
Chandrakirti Centre	3 x Bio Loo Toilet Units	\$ 4,000.00

Citizens Advice Bureau - Nelson-Tasman Inc	Computers	\$ 2,922.00
City Of Nelson Highland Pipe Band Inc	Drum heads	\$ 1,000.00
City Of Nelson Highland Pipe Band Inc	New Pipe Bags	\$ 1,000.00
Colonel Noel Percy Adams Trust (Melrose) Society	Carpet and underlay	\$ 1,995.65
Cystic Fibrosis Assoc. of NZ - Nelson	National conference attendance costs	\$ 3,000.00
Cystic Fibrosis Assoc. of NZ - Nelson	Conference attendance	\$ 9,173.25
Epilepsy Assn of NZ Nelson/Marlborough	Staff development & Training expenses	\$ 2,500.00
Epilepsy Assn of NZ Nelson/Marlborough	Computer & associated hardware	\$ 5,413.00
Epilepsy Assn of NZ Nelson/Marlborough	Salary and fuel costs	\$ 3,650.00
Epilepsy Association of NZ - Nelson/Marlborough	Projector	\$ 649.00
Eventing Nelson	St Johns Attendance	\$ 427.92
Eventing Nelson	Ambulance attendance	\$ 546.35
Federal Hockey Club	Uniforms	\$ 2,423.00
Garin College	Music equipment	\$ 6,000.00
Gymnastics Nelson	Venue Hire	\$ 2,000.00
Habitat for Humanity (Nelson) Ltd	Purchase Stove	\$ 781.73
Hearing Assn Nelson Inc	Heat Pump	\$ 3,057.77
Hearing Assn Nelson Inc	Upgrade foyer & meeting room	\$ 4,842.30
Hearing Assn Nelson Inc	Ultravac machine	\$ 2,066.00
Hope School BOT	5 iPads	\$ 1,600.00
Kidpower Teenpower & Fullpower Trust Inc	Equipment	\$ 1,341.42
Life Line Nelson	Telephone counselling training	\$ 1,990.00
Lifeline Nelson	External Supervision from July 2010 to July 2011	\$ 853.33
Lifeline Nelson	Travel, accommodation & costs to attend conference	\$ 900.00
Lifeline Nelson	Staff Training	\$ 3,820.00
Maitahi Outrigger Canoe Club	Safety boats	\$ 920.00
Manuka Community House Inc	Garden Shed	\$ 2,107.83
Marching Nelson	Airfares & Accommodation	\$ 788.00

ME/CFS Nelson Support Group Inc	Scanner & Toner	\$ 494.00
ME/CFS Nelson Support Group Inc	Computer	\$ 1,999.00
Moutere Hills Community Centre	Uniforms and equipment	\$ 740.43
Nayland College	Accommodation & Van	\$ 2,000.00
Nayland College	Travel & accommodation	\$ 3,500.00
Nelson A & P Association	Ambulance/ Medical Services	\$ 1,600.00
Nelson A & P Association	Ambulance Medical Coverage	\$ 1,600.00
Nelson A & P Association	Medical coverage	\$ 1,000.00
Nelson Basketball Assn Inc	Tournaments	\$ 3,000.00
Nelson Basketball Assn Inc	Accommodation & Travel	\$ 3,000.00
Nelson Basketball Assn Inc	Accommodation, Vehicle Hire, Entry Fees, Food & Fuel	\$ 3,000.00
Nelson Basketball Assn Inc	Transport, Accommodation, Entry Fees	\$ 3,000.00
Nelson Basketball Assn Inc	Travel, accommodation & entry fees	\$ 1,900.00
Nelson Basketball Assn Inc	Entry fees	\$ 2,000.00
Nelson Basketball Assn Inc	Entry fees	\$ 3,000.00
Nelson Basketball Assn Inc	Salary	\$ 8,000.00
Nelson Bays Football Inc	Uniforms	\$ 2,000.00
Nelson Bays Football Inc	Uniforms	\$ 4,000.00
Nelson Bays Harmony Chorus	Costume fabric	\$ 1,000.00
Nelson Bays Tennis Association	Laptop Computer	\$ 1,000.00
Nelson Bays Volleyball Association	Equipment & Uniforms	\$ 4,000.00
Nelson Bays Youth Teams Racing Assn Inc	Yacht	\$ 5,000.00
Nelson Bays Youth Teams Racing Assn Inc	Purchase Yacht	\$ 2,300.00
Nelson City Brass Inc	Travel costs	\$ 2,000.00
Nelson City Council	Production Costs	\$ 5,000.00
Nelson City Council	Stage sound and lighting costs	\$ 7,000.00
Nelson Civic Choir Inc	Soloists costs	\$ 3,000.00
Nelson Climbing Club	Flights	\$ 4,074.00
Nelson Climbing Club	Airfares to National Competitions	\$ 7,500.00
Nelson Climbing Club	Travel costs	\$ 4,000.00



Nelson College For Girls	Air fares, minivan & accommodation	\$ 3,812.00
Nelson College For Girls	InterIslander & accommodation	\$ 4,000.00
Nelson Contract Bridge Club	Bridge Terminals & accessories	\$ 4,000.00
Nelson Cricket Association Inc	Travel costs	\$ 3,000.00
Nelson district golf Referees Ass	Uniform Shirts	\$ 800.00
Nelson Dog Training Club Inc	2 x Judge Sheds	\$ 2,383.50
Nelson Dog Training Club Inc	Purchasing laptop & associated costs	\$ 2,217.94
Nelson Dog Training Club Inc	250 Ribbon sashes	\$ 1,499.31
Nelson Drag Racing Association Inc	Track Timer	\$ 9,465.00
Nelson Drag Racing Association Inc	Event sanctioning and Insurance, and aerodrome hire.	\$ 3,500.00
Nelson Hockey Association	1st Aid	\$ 1,200.00
Nelson Hockey Association	Tops	\$ 1,500.00
Nelson Hockey Association	Tops & skirts	\$ 1,568.00
Nelson Hockey Association	Equipment and goalkeeper tops	\$ 2,067.13
Nelson Hockey Association	Accommodation	\$ 10,000.00
Nelson Hockey Association 1993 Inc	Hockey Balls	\$ 1,400.00
Nelson Hockey Association 1993 Inc	First Aid services	\$ 1,000.00
Nelson Indoor Bowls Assn	Travel & Accommodation	\$ 1,558.00
Nelson Indoor Bowls Assn	Accommodation & Travel	\$ 800.00
Nelson Jazz Club Inc	Security and St Johns	\$ 1,000.00
Nelson Marlborough Rescue Helicopter	Helicopter Utility Basket	\$ 5,000.00
Nelson Marlborough Rescue Helicopter Trust	Purchasing a Stryker M1 Stretcher	\$ 11,588.00
Nelson Motorcycle Club Inc	Emergency Cover Costs	\$ 1,624.38
Nelson Motorcycle Club Inc	Clay Supply	\$ 5,633.85
Nelson Mountain Bike Club	Accommodation, travel & entry	\$ 2,000.00
Nelson Musical Theatre Inc	Storage units	\$ 3,600.00
Nelson Netball Centre	Accommodation and Travel	\$ 10,000.00
Nelson Performing Arts Competitions Inc	Printing	\$ 1,400.00
Nelson Poultry & Pigeon Assn	Laptop	\$ 749.00
Nelson Railway Society Inc	Treatment of sleepers	\$ 2,200.00

Nelson Railway Society Inc	Radiator	\$ 4,200.00
Nelson Region Hospice Trust	Wages	\$ 20,000.00
Nelson Rowing Club Inc	Safety Coaching Boat	\$ 5,200.00
Nelson Rowing Club Inc	Conference Attendance	\$ 1,735.11
Nelson Rowing Club Inc	Purchase 4 Quad Rowing Skiffs	\$ 10,000.00
Nelson Rugby Football Club Inc	First Aid / Ambulance - 2010 season	\$ 1,000.00
Nelson Rugby Football Club Inc	Ground charges	\$ 2,000.00
Nelson Rugby Football Club Inc	Rent	\$ 2,880.00
Nelson Santa Parade Trust	Hire of sound systems	\$ 3,467.00
Nelson Savage Club	Service badges & bars	\$ 595.00
Nelson Savage Club	Transport	\$ 1,000.00
Nelson South Swimming Club	Accommodation	\$ 3,000.00
Nelson Speedway Association Inc	Replace Locks & Keys	\$ 2,999.26
Nelson Speedway Association Inc	Build new toilet block	\$ 25,000.00
Nelson Speedway Association Inc	Repairs to concrete wall	\$ 7,000.00
Nelson Speedway Association Inc	Relocate and upgrade building	\$ 40,000.00
Nelson Suburbs Football Club Inc	Playing shirts and socks	\$ 5,000.00
Nelson Triathlon Club	Gibbs Hill Challenge Costs	\$ 1,700.63
Nelson Whalers Inline Hockey Club inc	Accommodation & Travel	\$ 2,500.00
Nelson Womens Refuge	Wages, utilities, stationery, rent and vehicle running costs	\$ 10,000.00
Nelson Womens Refuge	Wages and operational costs	\$ 20,000.00
Nelson Yacht Club	Dinghys x 6	\$ 26,060.88
Nelson's Neighbourhood Centre	Laptop	\$ 1,066.32
NZ Dancesport Assn of Nelson Inc	Easter Festival costs 23/24 April 2011	\$ 5,000.00
NZ Dancesport Assn of Nelson Inc	Funding for 2012 Easter championships & festival	\$ 5,000.00
Parent To Parent Nelson	Training & Conference costs, phone & office Rental	\$ 3,988.00
Parent To Parent Nelson	Travel & registration fees	\$ 700.00
Parent To Parent Nelson	National training attendance	\$ 890.00
Parent To Parent Nelson	National conference attendance costs	\$ 1,021.00

Parent To Parent Nelson	Course attendance	\$ 890.00
Parikarangeranga Ki Rangitoto Trust	Laptop computers & Wireless adapter	\$ 1,379.00
Post Natal Depression Support Network	Printing costs	\$ 500.00
Riding For The Disabled Whakatu	Hay and feed	\$ 1,705.00
Sexual Abuse Support & Healing - Nelson	Audit fee, training and recruitment costs	\$ 1,000.00
Silveraires Leisure Marching	Accommodation & Travel	\$ 3,000.00
Soccer Nelson Inc	Training gear	\$ 1,071.00
Soccer Nelson Inc	Coaching Course	\$ 1,800.00
Soccer Nelson Inc	Ground fees only	\$ 1,250.00
Soccer Nelson Inc	Ground fees and Rental vehicle	\$ 1,300.00
St Josephs School Parent Teacher Assn	Blinds	\$ 1,000.00
Stoke Bowling Club	Defibrillator	\$ 1,000.00
Stoke Bowling Club	Water tank,Storm water disposal & Car park	\$ 5,000.00
Suburbs AFC	Ground Rental	\$ 1,000.00
Suburbs AFC	Ground Fees	\$ 1,500.00
Suburbs AFC	Ground fees	\$ 2,500.00
Tasman Aquatic Multisport Development Trust	Feasibility study	\$ 5,000.00
Tasman Hockey	Leg Guards, Kickers & Gloves	\$ 2,225.00
Tasman Hockey	Uniforms	\$ 2,846.27
Tasman Rugby Union	Uniforms, equipment and Referee operational costs	\$ 19,000.00
Tasman Tennis Centre	Resurfacing of courts	\$ 4,400.00
Tasman Volleyball Association Inc	Venue Hire, Tournament Management & Equipment	\$ 1,029.24
Top Of The South Athletics Trust	Asphalt surrounds & Safety fence	\$ 5,000.00
Top Of The South Athletics Trust	Asphalting & Fencing	\$ 5,000.00
United Bowling Club	Maintaining greens for 6 months	\$ 4,500.00
United Bowling Club	Greenkeepers fees	\$ 3,000.00
United Bowling Club	Hot water zip	\$ 1,300.00
United Bowling Club	Greens maintenance	\$ 3,000.00

Victory Community Anglican Church	Van	\$ 5,333.33
Waimea Old Boys Rugby Football Club	Security system	\$ 1,580.00
Whenua Iti Trust Inc	Course Outdoor Equipment	\$ 1,201.23
<b>TOTAL</b>		<b>\$ 637,925.11</b>

### Appendix B: National Grants 01/10/20011 - 31/03/2013

Applicant Name	Amount Approved
Altrusa International Inc District Fifteen	\$ 1,000.00
Alzheimers NZ Inc	\$ 245,721.16
Amputees Federation Of N Z	\$ 11,484.00
Aphasia Association Of NZ Inc	\$ 25,000.00
Arthritis Foundation Of NZ Inc	\$ 350,000.00
Arts On Tour NZ Trust	\$ 10,000.00
Arts On Tour NZ Trust	\$ 7,126.95
Asia NZ Foundation	\$ 11,610.00
Asthma And Respiratory Foundation of NZ Inc	\$ 7,783.10
Asthma And Respiratory Foundation of NZ Inc	\$ 500,000.00
Asthma New Zealand	\$ 22,080.00
Athletics NZ Inc	\$ 19,739.00
Athletics NZ Inc	\$ 21,394.02
Bach Musica NZ	\$ 6,000.00
BikeNZ Inc	\$ 30,000.00
BikeNZ Inc	\$ 11,000.00
BikeNZ Inc	\$ 100,000.00
Birthright NZ Inc	\$ 13,121.00
BMX NZ Inc	\$ 4,000.00
Boxing NZ Inc	\$ 7,477.40
Brass Band Assn of NZ Inc	\$ 6,000.00
Brass Band Assn of NZ Inc	\$ 5,000.00
Bromeliad Society of New Zealand	\$ 4,300.00
Camp Quality NZ	\$ 9,975.00
Canoe Racing NZ Inc	\$ 12,000.00
Canoe Racing NZ Inc	\$ 19,000.00
Canoe Slalom NZ Inc	\$ 5,191.25
Canteen NZ	\$ 50,000.00
Choirs Aotearoa NZ Trust	\$ 2,082.00
Chronic Pain & Fatigue Trust	\$ 5,000.00
Coeliac New Zealand Inc	\$ 10,750.00
Crohns & Colitis NZ Charitable Trust	\$ 50,000.00
Cystic Fibrosis Assn Of NZ Inc	\$ 20,000.00
Cystic Fibrosis Assn Of NZ Inc	\$ 10,000.00
Dance Aotearoa NZ Ltd	\$ 5,569.41
Deaf Aotearoa NZ Inc	\$ 250,000.00

Diabetes NZ Inc	\$ 214,000.00
Disabled Snow sports NZ Inc	\$ 6,564.40
Dyspraxia Support Group Of NZ Inc	\$ 1,684.00
Dyspraxia Support Group Of NZ Inc	\$ 7,480.00
Endometriosis NZ	\$ 15,000.00
Epilepsy Assn Of NZ	\$ 20,000.00
Epilepsy Assn Of NZ	\$ 35,000.00
Epilepsy Assn Of NZ	\$ 20,000.00
Equestrian Sports NZ	\$ 3,000.00
Friends Of Brain Injured Children Of NZ	\$ 8,505.00
Gifted Children Char Advancement Trust	\$ 14,400.00
Girls Brigade NZ Inc	\$ 5,000.00
Girls Brigade NZ Inc	\$ 5,000.00
Haemophilia Foundation of NZ Inc	\$ 10,000.00
Halberg Trust	\$ 18,571.41
Hearing Dogs For Deaf People NZ	\$ 20,000.00
Hospice NZ	\$ 8,021.00
Ice Speed Skating NZ Inc	\$ 3,000.00
Leisure Marching Nationals	\$ 2,256.00
Leonie Coates Gynaecological Cancer Trust	\$ 1,858.15
Leukaemia & Blood Foundation Of NZ	\$ 25,000.00
Life Education Trust NZ	\$ 415,000.00
Life Education Trust NZ	\$ 300,000.00
Make-A-Wish Foundation Of NZ Trust	\$ 5,345.18
Make-A-Wish Foundation Of NZ Trust	\$ 3,500.00
Maori Womens Welfare League	\$ 3,000.00
Marching NZ Incorporated	\$ 2,048.64
Melanoma Foundation of NZ	\$ 5,448.62
Melanoma Foundation of NZ	\$ 6,196.84
Mobility Assistance Dogs Trust	\$ 8,000.00
Modern Pentathlon NZ Inc	\$ 4,000.00
Modern Pentathlon NZ Inc	\$ 13,288.00
Motor Neurone Disease Assn NZ	\$ 44,000.00
Multiple Sclerosis Society NZ Inc	\$ 10,000.00
Muscular Dystrophy Assoc of NZ	\$ 10,407.60
National Foundation For The Deaf	\$ 25,000.00
National Male Choir Of NZ Inc	\$ 2,540.44
National Male Choir Of NZ Inc	\$ 2,806.96
National Railway Museum Of New Zealand	\$ 311,000.00
Neonatal Trust NZ	\$ 20,000.00
New Zealand Chinese Association Auckland Inc	\$ 2,000.00
New Zealand Croquet Council Inc	\$ 3,000.00
New Zealand Federation of Roller Sports Inc	\$ 10,856.00
New Zealand Kiwi Foundation	\$ 753.01
New Zealand Marist Rugby Football Federation Inc	\$ 10,000.00

New Zealand Mounted Games Assoc	\$ 5,000.00
New Zealand Mounted Games Assoc	\$ 1,284.80
New Zealand Toastmasters	\$ 570.00
NZ 420 Class Association Inc	\$ 5,000.00
NZ Academy Of Highland & National Dancing	\$ 2,000.00
NZ Academy Of Highland & National Dancing	\$ 2,500.00
NZ Aids Foundation	\$ 5,000.00
NZ Angling & Casting Assn Inc	\$ 1,000.00
NZ Aria Trust	\$ 5,000.00
NZ Badminton Academy	\$ 6,766.92
NZ Canoe Polo	\$ 2,000.00
NZ Canoe Polo	\$ 2,500.00
NZ Choral Federation	\$ 5,000.00
NZ Choral Federation	\$ 3,000.00
NZ Continence Assn	\$ 8,689.33
NZ Council Of Victim Support Groups	\$ 2,000.00
NZ Country Music Association Inc	\$ 950.00
NZ Croquet Council Inc	\$ 7,000.00
NZ Curling Association	\$ 7,420.00
NZ Dance Advancement Trust	\$ 17,240.00
NZ Dancesport Trust	\$ 50,000.00
NZ Deaf Rugby Football Union	\$ 4,766.00
NZ Down Syndrome Assn Inc	\$ 100,000.00
NZ Federation of Multicultural Councils Inc	\$ 8,500.00
NZ Federation of Multicultural Councils Inc	\$ 6,177.00
NZ Federation Of Roller Sports	\$ 3,108.00
NZ Federation of Young Farmers Clubs Inc	\$ 9,553.00
NZ Film Archive	\$ 25,882.49
NZ Grand Prix Hydro Plane Drivers Inc	\$ 5,000.00
NZ Hockey Federation Inc	\$ 10,000.00
NZ Ice Hockey Federation	\$ 5,000.00
NZ Indoor Bowls Inc	\$ 9,500.00
NZ Kennel Club Inc	\$ 5,000.00
NZ LAM Charitable Trust	\$ 10,833.00
NZ Land Search & Rescue Inc	\$ 50,000.00
NZ Land Search & Rescue Inc	\$ 17,733.69
NZ Lavender Growers Assn Inc	\$ 1,200.00
NZ Marist Rugby Football Federation	\$ 7,200.00
NZ Marist Rugby Football Federation	\$ 10,000.00
NZ Masters Billiards & Snooker Assn	\$ 2,760.00
NZ Miniature Horse Assn	\$ 5,749.14
NZ Miniature Horse Assn	\$ 5,749.14
NZ Mounted Games Assn Inc	\$ 3,500.00
NZ Mounted Games Assn Inc	\$ 14,959.00
NZ National Horse & Pony Show Assn	\$ 5,000.00

NZ National Maritime Museum	\$ 6,000.00
NZ National Maritime Museum	\$ 10,000.00
NZ Offshore Powerboat Assn Inc	\$ 8,450.00
NZ Offshore Powerboat Assn Inc	\$ 3,928.95
NZ Opera Ltd	\$ 95,000.00
NZ Parent Teacher Assn Inc	\$ 3,530.00
NZ Pinto Horse Society Inc	\$ 2,500.00
NZ Police Pipe Band	\$ 18,136.30
NZ Polocrosse Council Inc	\$ 2,000.00
NZ Pops Orchestra Foundation Trust	\$ 6,000.00
NZ Power Boat Association	\$ 1,000.00
NZ Riding For The Disabled Assc Inc	\$ 21,143.40
NZ Rowing Assn Inc	\$ 35,960.00
NZ Science & Technology Charitable Trust	\$ 3,000.00
NZ Sign Language Teachers Assn Inc	\$ 2,182.00
NZ Spinal Trust	\$ 100,000.00
NZ Sports Hall Of Fame	\$ 10,000.00
NZ Sports Hall Of Fame	\$ 10,000.00
NZ Sports Journalists Assn Inc	\$ 5,750.00
NZ Symphony Orchestra	\$ 100,000.00
NZ Water Polo Association Inc	\$ 20,000.00
NZ Water Ski Assn Inc	\$ 1,200.00
NZ Wheelchair Rugby	\$ 3,405.00
NZ Wheelchair Rugby	\$ 8,252.00
NZ Williams Syndrome Assn	\$ 6,000.00
NZBSA Motorcycle Owners Club	\$ 2,472.50
Outline NZ Inc	\$ 4,556.00
Outward Bound Trust Of NZ	\$ 300,000.00
Outward Bound Trust Of NZ	\$ 300,000.00
Parents Inc	\$ 3,850.00
Parkinsonism Society Of NZ Inc	\$ 90,052.00
Performing Arts Competitions Asso Of NZ	\$ 4,166.75
Philatelic Youth Council Of NZ Inc	\$ 400.00
Photoplayer Restoration Trust	\$ 5,000.00
Physical Education New Zealand	\$ 10,000.00
Pregnancy Help Inc	\$ 1,000.00
Prison Fellowship NZ	\$ 5,421.73
Recreate NZ	\$ 1,690.43
RNZE Charitable Trust	\$ 5,580.95
RNZE Charitable Trust	\$ 96.60
Royal Agricultural Soc NZ Inc	\$ 3,960.00
Royal Forest and Bird Protection Society of NZ	\$ 7,541.52
Royal NZ Ballet	\$ 373,994.00
Royal NZ Pipe Bands Assn	\$ 50,000.00
Royal NZ Pipe Bands Assn	\$ 50,000.00

Save Animals From Exploitation Inc	\$ 17,265.00
Scout Assn Of NZ	\$ 50,000.00
Sevens With Altitude Inc	\$ 220,000.00
Sir Edmund Hillary Outdoor Pursuits	\$ 235,662.60
Special Olympics NZ	\$ 265,000.00
Speld NZ Inc	\$ 5,000.00
Speld NZ Inc	\$ 4,900.00
Spirit Of Adventure Trust	\$ 500,000.00
Sri Lanka Assn Of NZ	\$ 2,000.00
Starjam Charitable Trust	\$ 39,458.00
Storylines Childrens Literature Charitable Trust	\$ 10,000.00
Surf Life Saving NZ Inc	\$ 100,000.00
Surf Life Saving NZ Inc	\$ 38,350.00
Surfing NZ Inc	\$ 7,745.00
Tae Kwon Do Union Of NZ Inc	\$ 3,893.50
Tennis NZ Inc	\$ 35,000.00
Tennis NZ Inc	\$ 20,000.00
Triathlon NZ Inc	\$ 100,000.00
Underwater Hockey NZ	\$ 8,476.20
Union Of NZ Karate Organisations Inc	\$ 8,000.00
United Fire Brigade Assn Of NZ Inc	\$ 20,000.00
United Nations Association Of NZ	\$ 2,000.00
Volleyball NZ Inc	\$ 50,000.00
Wheelchair Basketball NZ	\$ 12,000.00
Wheelchair Basketball NZ	\$ 12,000.00
Worldskills NZ	\$ 7,325.22
<b>TOTAL</b>	<b>\$ 7,476,322.70</b>



Appendix C: Venue Check List & Harm Prevention and Minimisation Policy

Venue Compliance  
Self Checklist



Person completing:

Name

Date

Signage and forms in the Gaming Area

ALL THE PUB CHARITY'S SIGNAGE SUPPLIED MUST BE ON DISPLAY. THIS INCLUDES:

- Is there a copy of the Venue License?  Yes  No
- Is there a statement that encourages players to gamble at a level they can afford?  Yes  No
- Is there information on how to seek assistance for problem gambling?  
(This also includes information on self-exclusion and explains that copies of the Harm Prevention and Minimization Policy are available on request)  Yes  No
- Are the Secretary of Internal Affairs contact details for complaints about Pub Charity, or the conduct of gaming at this venue on display?  Yes  No
- Are there donations application forms and question/complaint information?  Yes  No
- Are there locked player instructions?  Yes  No

FORMS AND PAMPHLETS

- Are the problem gambling pamphlets/advice cards provided by Pub Charity available?  
(These include odds of winning, problem gambling characteristics, and where to seek advice.)  
Does the venue have a good supply of these on display and on hand?  Yes  No
- Are the donations application forms provided by Pub Charity available?  
Does the venue have a good supply of these on display and on hand?  Yes  No

OTHER GRANT INFORMATION

- Can you confirm there is no unauthorised or non-Pub Charity signage in regard to the application for donations at the venue?  Yes  No

JACKPOT INFORMATION (IF ONE IS INSTALLED), THIS INCLUDES:

- Is the jackpot display positioned in a place where it has maximum visibility to players connected to it?  Yes  No
- Are the required signs and instruction notices displayed (including warning machine identification)?  Yes  No
- Is the Jackpot Controller located in a secure and separately lockable container and is easily enclosed in a cabinet?  Yes  No

Signage near/at every gaming machine

- Do all gaming machines have an Under 16 message on them?  Yes  No
- Do the 'One Player per Machine' message (Gaming Rule 8) on display?  Yes  No
- Do the 'No Syndicated Play' message (Gaming Rule 9) on display?  Yes  No

Signage at the principle entrance to the venue

Is a copy of the Venue Licence on display?  Yes  No

Is the grant application and competent information signage on display?  Yes  No

Signage/advertising outside the venue

Is there a jackpot display (which may involve electronic activity) within the Gaming Area visible from outside the venue?  Yes  No

Has the word 'Gaming' been used outside the venue (e.g. published through any media, or on any signage)?  Yes  No

Has the word 'Casino' been used anywhere (outside or inside the venue (e.g. in media or signage)?  Yes  No

Venue Personnel

**ENTRANCE VISIBILITY**

Do staff have a clear view of all entrances to the Gaming Area under normal circumstances?  Yes  No

**HARM MINIMISATION**

Do staff know what to do if they suspect a person is a problem gambler or are approached by a person who admits to having a gambling problem?  Yes  No

Are all Duty Managers aware of how to carry out: manager-initiated exclusions and self-initiated exclusions in line with Pub Charity's policy?  Yes  No

Are staff aware of and enforcing the one-player-one-machine rule and the no syndicates rule?  Yes  No

**STAFF TRAINING**

Are all personnel involved in the venue's gaming operation recorded in the 'Staff Training Register'?  Yes  No

**KEY PERSONNEL**

- Have there been any changes to key personnel involved with the venue?  
This includes Venue Manager, Venue Operator (company), Company Director(s), and Company Shareholder(s)  
NOTE: Pub Charity must be notified if there are any changes to key personnel.  Yes  No

- Have any personal information details changed since the issue date of the current Venue Licence?  Yes  No

**GAMING EQUIPMENT KEY REGISTER**

Is the venue Gaming Equipment Key Register being maintained correctly? (Refer to Game Rule 13)  Yes  No

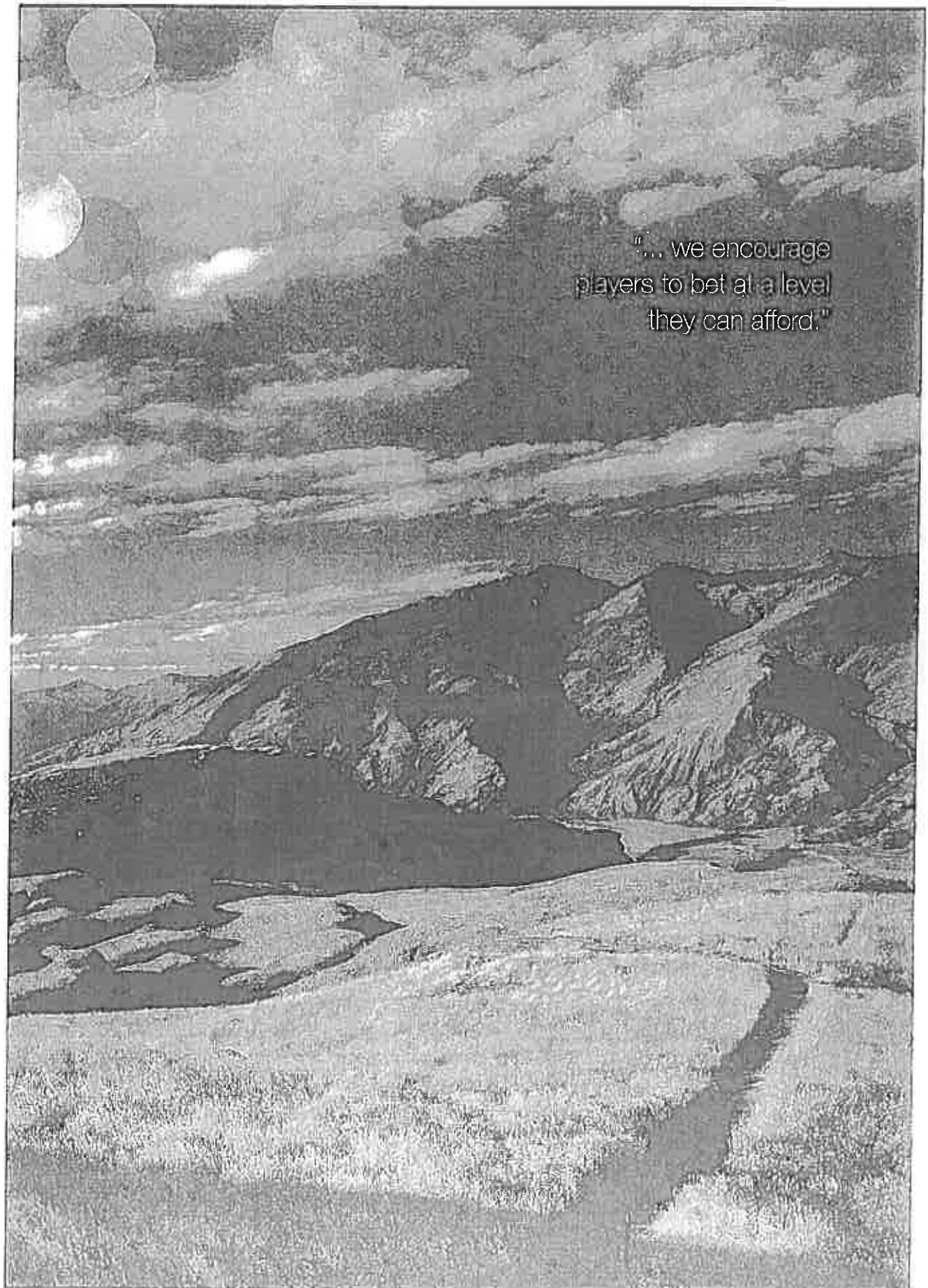
Contact Pub Charity

Has the venue been visited by a DIA Inspector of Gaming recently?  Yes  No

If so, was Pub Charity advised? (If Pub Charity was not advised, please tick so)  Yes  No

Are there any issues/queries that require attention/ addressing by Pub Charity staff? If so, please contact Pub Charity.  Yes  No

# Harm Prevention and Minimisation Policy



"... we encourage  
players to bet at a level  
they can afford."

Members of Pub Charity and their Venue Operators accept a duty to provide a responsible gaming environment. In this environment, the potential for harm is minimised and patrons can make informed decisions about their participation in gaming activities.

---

#### INTRODUCTION

For over 500,000 New Zealanders every year, gaming machines provide a harmless and enjoyable form of entertainment and leisure activity within the hospitality industry. However, it is acknowledged that some individuals may be at risk of developing addictive gambling behaviour. It is the objective of Pub Charity to ensure that this risk is eliminated or at the very least minimised.

It is our policy to minimise any harm caused by gambling and, where possible, to intervene and identify *problem gamblers* and offer them appropriate assistance, as the law requires. We encourage players to bet at a level they can afford.

---

#### WHAT IS A PROBLEM GAMBLER

A problem gambler is a person "*whose gambling causes harm or may cause harm*" (Gambling Act 2003). Harm in the Gambling Act 2003 is defined as:

- (a) means harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and
- (b) includes personal, social, or economic harm suffered—
  - (i) by the person; or
  - (ii) the person's spouse, civil union partner, de facto partner, family, whanau, or wider community; or
  - (iii) in the workplace; or
  - (iv) by society at large

Evidence of harm or potential harm may include the following:

- Self disclosure by the individual that he/she is a problem gambler and has suffered harm or that his/her gambling has caused "others" harm. Such disclosure may be a full disclosure, a partial disclosure or a veiled disclosure; for example "I don't know how I will pay this week's rent".
- Evidence (documented and verified) supplied by a family member or significant other that harm has been caused by the person's gambling.
- Any evidence of harm brought to the attention of venue manager or other venue staff.

**"Any gambler who considers they are a problem gambler may request venue personnel to issue an exclusion order under the Gambling Act 2003."**

---

#### HOW WE CAN HELP

Any gambler who considers they are a problem gambler may request venue personnel to issue an Exclusion Order under the Gambling Act 2003.

Individuals who self-identify as problem gamblers or who are identified as potential or actual problem gamblers will be offered information and advice.

This information will include the provision of Exclusion Orders and problem gambling literature. Venue staff will facilitate the use of Exclusion Orders in accordance with their legal responsibilities under the Gambling Act 2003 in order to prevent problem gamblers from gambling at venues.

We are required by law to intervene and actively identify any persons who, in good faith, we believe may be actual or potential problem gamblers in the venues in which Pub Charity operates gambling.

"Problem Gambling can be described as occasional or regular gambling to excess, to the extent that it leads to problems in other areas of life, particularly with finances and inter-personal relationships. These problems can range from minor ones involving, for example, arguments with family members over gambling expenditure, to problems involving a compulsive addiction to gambling resulting in major financial or inter-personal difficulties"

"The harmful effects of problem gambling can include financial problems, problems at work (ranging from poor performance to fraud), alcohol abuse, mental health problems and family violence. Problem Gambling almost invariably affects not only the gamblers themselves but also the other people in their lives" (Department of Internal Affairs, 2005).

To ensure the objectives are met, and that staff at each Pub Charity venue are aware of their responsibilities, each venue will appoint a Venue Nominee.

The Venue Nominee will be responsible for ensuring the venue maintains responsible gambling policy standards. The Venue Nominee at all Pub Charity venues is the designated Venue Manager whose name appears on the Venue Licence issued by the Department of Internal Affairs. A copy of this licence is displayed in the Gaming Room.

Pub Charity will ensure appropriate problem gambling literature is available as both signage and brochures. The Venue Manager will ensure literature is available at all times.

Problem gambling literature will be predominantly displayed in gaming areas and other prominent areas identified by the Venue Manager.

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## IDENTIFYING PROBLEM GAMBLERS

The policy for identifying problem gamblers includes the identification of potential and actual problem gamblers. All gamblers have the potential to develop a gambling problem and are therefore identified as potential problem gamblers. Some potential problem gamblers will be more at risk than others.

The characteristics of a potential problem gambler include, but are not limited to, the following:

- Waiting for a venue to open or being last to leave
- Frequent attendance in the gaming area
- Prioritising gambling above family, friends, employment, self (hygiene) e.g. neglecting children
- Playing for extended periods
- Requests for credit
- Attempt to cash cheques
- Long sessions of play
- Exhibiting disorderly behaviour
- Appearing distressed
- Mood swings
- Causing damage to machines
- Frequent EFTPOS transactions
- Declined EFTPOS transactions
- Abusive behaviour
- Attempts to borrow money
- Attempts to sell personal affects.

---

## HELPING TO MINIMISE HARM

Pub Charity realises the limitations of observational data alone in identifying potential and actual problem gamblers.

All Pub Charity venues will maintain an Incident Register for harm minimisation, to document all actions taken with respect to gamblers (both potential and actual problem gamblers).

This documentation will establish compliance with the objectives of the Gambling Act 2003 relating to harm minimisation and harm prevention. Documentation will result in responsible action taken by staff who will recognise, in the completion of this documentation, the need to be fair and objective. This documentation will be essential if required for any review process.

---

**UNDER AGE GAMBLERS**

"If venue staff at any Pub Charity venue has reasonable grounds to suspect that a person is under the age of 18, they will refuse to pay out any money won by that person."

Persons participating in gaming must be at least 18 years old.

Every person under the age of 18 commits an offence and is liable to summary conviction to a fine not exceeding \$500.00 if they participate in gambling at a Pub Charity venue.

Every Corporate Society that allows a person under the age of 18 to participate in gambling commits an offence and is liable on summary conviction to a fine not exceeding \$5,000.00.

Every Venue Manager or key person employed at a Pub Charity venue who allows a person under the age of 18 to participate in gambling commits an offence and is liable on summary conviction to a fine not exceeding \$1,000.00.

**Evidence of age**

Patrons should not be offended if asked for evidence of age documentation.

There are three evidence of age documents that are acceptable:

- Valid passport
- New Zealand (photo) Drivers Licence
- HANZ 18+ Card.

If venue staff at any Pub Charity venue has reasonable grounds to suspect that a person is under the age of 18, they will refuse to pay out any money won by that person. Under age gambling may indicate a potential problem gambling issue.

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**TREATMENT PROVIDERS**

There are problem gambling help services in most areas of New Zealand. Free help can be obtained by calling one of the toll free numbers listed below.

- Problem Gambling Helpline – 0800 654 655
- Ministry of Health – 0800 611 116
- Woodlands Centre – 0800 333 122
- Problem Gambling Foundation – 0800 664 262

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**ADMISSION TO PUB CHARITY CLASS 4 VENUES**

Under section 307 of the Gambling Act 2003 the following conditions apply:

- The fact that a venue is licensed as a Class 4 venue does not entitle any person to enter or remain on these premises.
- Any person at this venue, must leave if required to do so by a representative, or on behalf of the holder of the venue's class 4 venue licence.
- The holder of the class 4 venue licence, or any person acting on behalf of the licence holder, does not need to give any reason for denying entry to a person, or requiring a person to leave this venue.

---

**POLICY DETAILS SPECIFIC TO THIS VENUE**

If there are some Harm Prevention and Minimisation details specific to this particular venue, they will be attached.

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Submission on Gambling Policy Review  
**Date:** Monday, 8 July 2013 1:24:56 p.m.

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**From:** Council Enquiries (Enquiry)  
**Sent:** Monday, July 08, 2013 1:24:55 PM  
**To:** Submissions  
**Subject:** Submission on Gambling Policy Review  
**Auto forwarded by a Rule**

## Submission on Gambling Policy Review

**Your name**

George Verry

**Organisation represented (if applicable)**

United Fire Brigades' Association

**Your address**

86 Main Road  
Tawa, Wellington

**Your phone number**

04 237 2681

**Your email address**

george.verry@ufba.org.nz

**Would you like to talk about your submission at a hearing?**

No

**Your submission**

After reviewing the Nelson City Council's proposal on the Gaming Review Policy, the United Fire Brigades' Association supports the status quo. We take this view based upon our status as a not for profit organisation that has added value for our predominantly volunteer membership through supplementary grant funding.

We are also aware that a number of our volunteer brigades – comprising 8,000 individuals – have also sought financial support through various trusts that are funded through pokie machines.

**Would you like to upload a file in support of your submission?**

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Gambling Policy Review  
**Date:** Monday, 8 July 2013 2:56:59 p.m.

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**From:** Ed Shuttleworth[SMTP:ED@NELSONCRICKET.ORG.NZ]  
**Sent:** Monday, July 08, 2013 2:56:49 PM  
**To:** Submissions  
**Subject:** Gambling Policy Review  
**Auto forwarded by a Rule**

Dear Council,

The below email is a short informative submission from Nelson Cricket Association.

This email will not enter into the debate on gambling and current policy, however it will seek to highlight to council the likely impact of the reduction and eventual withdrawal of gaming funding to our sport.

Cricket has flourished in the past 18 months. We have seen a 40% growth in the participation of our sport, taking numbers to over 6000. More First Class games per season than ever in our history. The accreditation of Saxton Oval as an International stadium, with international games likely to be played there in the next 7 months. None of the above would have been possible without the support of gaming funds. Gaming funds have allowed us to employ 2 staff members, including a new General Manager role, a position which would not exist if these funds were to disappear.

Within Cricket there are multiple stakeholders who rely heavily on game funding; Schools, Club and Representative and each of these are extremely reliant on these funds.

Without game funding assistance the cost of the game will rise dramatically, which will directly impact participation levels and affect the successes we have seen over the past 18 months.

Ground Fees, Equipment, Uniforms, Staff, Travel and Competitions subsidy allow any individual to participate in our sport, which locally runs under the motto

“making cricket fun, successful and available to everyone in our community”.

As the representative for cricket in the region from International, First Class, Rep, Club, School and Community I am happy to speak on the above in more detail if required.

Again, as I highlighted initially I am keen not to enter the debate on the politics of the gambling act but do believe it is vital all realise that the catastrophic impact the



reduction and removal of gaming funding will have to our game and many other codes.

Thank you for taking the time to read this.

Best Regards  
Ed Shuttleworth

General Manager – Nelson Cricket Association  
021548281

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Nelson City Council Gambling Policy Submission  
**Date:** Monday, 8 July 2013 3:07:18 p.m.  
**Attachments:** [Nelson City Council Gambling Policy Submission 8 July 2013.docx](#)

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**From:** Nigel Muir[SMTP:NIGEL.M@SPORTTASMAN.ORG.NZ]  
**Sent:** Monday, July 08, 2013 3:06:20 PM  
**To:** Submissions; Council Enquiries (Enquiry)  
**Cc:** Richard Kempthorne (Richard.Kempthorne@tasman.govt.nz);  
Jeff Rackley (jeff@havenrealty.co.nz)  
**Subject:** Nelson City Council Gambling Policy Submission  
Auto forwarded by a Rule

Please find attached our submission on the Nelson City Council's Gambling Policy Review.

Kind regards Nigel

**Nigel Muir**  
CEO  
Sport Tasman

Registered Charity (CC11102)  
142 Saxton Road East, Stoke  
PO Box 3197, Richmond, Nelson 7050  
ph: 03 546 3304  
mob: 027 546 3301  
email: [nmuir@sporttasman.org.nz](mailto:nmuir@sporttasman.org.nz)  
web: [www.sporttasman.org.nz](http://www.sporttasman.org.nz)  
facebook: [www.facebook.com/sporttasman.nz](http://www.facebook.com/sporttasman.nz)



**KiwiSport**  
Next round closes  
9 August 2013

**Note:**

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient. Sport Tasman and any of its subsidiaries each reserve the right to monitor all e-mail communications through its networks.

Any views expressed in this message are those of the individual sender, except where the message states otherwise and the sender is authorised to state them to be the views of any such entity.

Thank You.



Sport Tasman

## Our response to the proposed "Sinking Lid" Gambling Policy Review.

To: Consultation, The Nelson City Council, Gambling Policy Review, 8 July 2013.

From: Nigel Muir, Sport Tasman, Phone 03 546 7910.

**Acknowledgement of Problem Gambling:** Sport Tasman acknowledges that all forms of gambling, including gaming machines, can cause harm to individuals, their families and other people they come into contact with. It is however important to recognize that at any given time, between 0.3% and 1.8% of adults in New Zealand are classified as problem gamblers.

**Value of Sport and Recreation:** Any change in the sustainability of sport and recreation has a wide reaching impact on the health, wellbeing, vibrancy, social connectedness and economic resilience of the top of the South Island. For this reason we **oppose** changes to the Gambling Policy that will reduce the available funding.  
**Our Response to the Gambling Policy review:**

PROPOSED CHANGE	POSITION
1. To amend the current policy on class 4 (pokie) venues by introducing a "sinking lid"	<p><b>Oppose this change:</b> Based for four reasons:</p> <ol style="list-style-type: none"> <li>1. This policy change would reduce the amount of funds available to sport and recreation in our community.</li> <li>2. There is evidence that a sinking lid policy will have no impact. Despite a 30% reduction in gaming machines and revenues since 2004, New Zealand's overall gambling market has remained constant. Gamblers simply move their gambling to other forms which has a flow on impact of less money to support local communities.</li> <li>3. There is a conflict of interest with the council controlling the number of machines and also utilising funding for Council assets from such machines.</li> <li>4. The number of machines operating in Nelson City has been steadily declining and currently site below the cap. In December 2011 there were 248 machines operating across 18 class 4 venues vs 265 licensed to operate.</li> </ol>
2. To separate the current Gambling Policy into two separate policies. The first to cover the criteria for granting or withholding consent for the establishment of pokie venues. The second to cover the criteria for granting or withholding consent for the establishment of TAB venues	<p><b>Neutral:</b> We understand that this change is driven by the fact that pokie and TAB venues are governed by different legislation and hence have different issues.</p>

The areas highlighted in our submission will have a significant impact on the sport and recreation and charitable sector.

We would ask that the Nelson City Council amends its policy as outlined in our submission.

Yours sincerely

Nigel Muir

Sport Tasman, PO Box 3197, Richmond, Nelson 7050

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Hockey New Zealand Submission - Gambling Policy Review.  
**Date:** Monday, 8 July 2013 3:35:28 p.m.  
**Attachments:** [HNZ Submission to Nelson City Council - Gambling Policy Review 5 July 2013.pdf](#)

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**From:** Jacqui Swan[SMTP:JACQUI@HOCKEYNZ.CO.NZ]  
**Sent:** Monday, July 08, 2013 3:34:54 PM  
**To:** Submissions  
**Subject:** Hockey New Zealand Submission - Gambling Policy Reveiw.  
**Auto forwarded by a Rule**

Please find attached Hockey New Zealand's submission to Nelson City Council relating to the Gambling Policy Review.

Kind regards  
Jacqui Swan  
Administration Manager  
Mobile: 027 6030081

  **Follow the Black Sticks**



The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
		Submission Number	
File Ref		INITIALS	

Name Donna Dicken -

Daytime phone 09-630-2932

Address 14, Normandy Rd, Mt Eden, Auckland

Organisation represented (if applicable) Hockey New Zealand

Do you wish to be heard in support of your submission?  YES  NO # of pages

           If you do not tick a box we will assume you do not wish to be heard.

**Public information**  
Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

As a member of an organisation that benefits from charitable gaming machine funding,

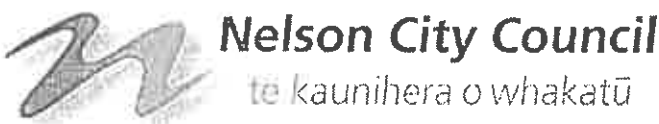
- > Gaming machines have been in pubs in New Zealand for a long time.
- > Most people play machines without any problems, the money that the machines generate for our organisation is important.
- > Getting access to funding is hard enough without reducing the number of gaming machines.

I do not support the proposal by the Nelson City Council (clause 1) to place a 'sinking lid' on gaming machine numbers.

Date 5/7/13

Signature 

Help with making a submission overleaf...



PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz



5 July 2013

Nelson City Council  
P O Box 645  
Nelson

**Re: Nelson City Council Gambling Policy Review  
On behalf of Hockey NZ & Nelson Hockey Association**

We wish to register our concern regarding the effect that the 'sinking lid policy' will have on funding for Hockey & Sport in general. Over the past few years we have experienced nationally a reduction in Gaming Grants as a result of the various Councils sinking lid Policies.

As the National Organisation for Hockey we, our Regions, Associations and Clubs rely heavily on grants from the various Gaming Trusts around the country. Further impact on this source of funding as a result of the continued 'sinking lid policy' could be catastrophic for us and amateur sport nationally.

***Hockey in your region*** relies on funding from Gaming Trusts to survive. With it we are able to provide a wide range of hockey activities, much of which is centered on the amateur junior level from Primary / Intermediate / Secondary Schools to Club and national representative teams.

Without the generous support of the Gaming Trusts many of our grassroots programmes benefiting in excess of 100,000 people nationally and specifically throughout the Nelson Region would not be able to be continued, which could ultimately lead to the demise of hockey in the Regions.

We cannot **emphasis enough**, that without the continued support of Gaming Trust's, many of our coaching and development initiatives would not be possible.

Just as importantly, involvement from players and participants of all ages has a significant social benefit for the community.

Hockey indeed sport in general is an invaluable tool for developing peoples self-esteem, their ability to interact with others, building confidence and a host of other skills to stand them in good stead throughout their lives.

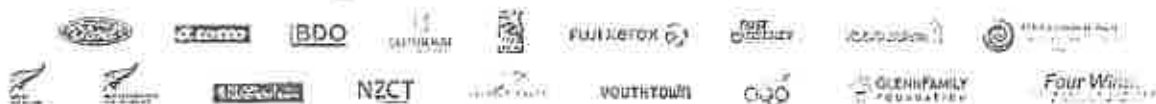
**An Overview of Our Organisation**

Hockey New Zealand is fundamentally charged with harnessing the enthusiasm and love of the game, and providing a framework to promote the sport throughout the country from grassroots to elite.

223,000 youth played hockey over the last 12 months, with 100,000 school children targeted through our small sticks programme over the next 5 years, over 80,000 registered winter & summer club players.

Hockey is recognised as a well governed and managed sport - nationwide we administer and provide hockey to: 8 Regions, 32 Associations, 300 Clubs, 2500 Primary Schools & 440 Secondary Schools.

Proudly supported by: Active Post  
Principal Partner of Small Sticks



## Summary

The "sinking lid policy" imposes possible further restrictions on one of the main areas of funding for us as NSO (National Sports Organisation) our Regions, Associations & Clubs

We ask that the committee take strong note of this, and consider not to adopt the "sinking lid policy", and make changes to allow for the retention of this avenue of community based funding.

Without that the future of hockey within the Nelson region, throughout New Zealand and amateur sport in general is seriously under threat.

Kind regards

A handwritten signature in black ink, appearing to read 'Donna Dicker', with a long horizontal line extending to the right.

**Donna Dicker**  
**Finance Manager**

**From:** [Submissions](#)  
**To:** [Administration Support](#)  
**Subject:** FW: Nelson City Council Gambling Policy Submission  
**Date:** Monday, 8 July 2013 3:35:49 p.m.  
**Attachments:** [Nelson City Council gambling submission July 8 2013.docx](#)

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**From:** Clive Beaumont[SMTP:CLIVE.BEAUMONT@MAINLANDFOOTBALL.CO.NZ]  
**Sent:** Monday, July 08, 2013 3:35:35 PM  
**To:** Submissions; Council Enquiries (Enquiry)  
**Subject:** Nelson City Council Gambling Policy Submission  
**Auto forwarded by a Rule**

Dear Sir

Please find attached our submission with regard to the above Policy

**Clive Beaumont** General Manager  
Mob 027 647 5600 Ph 03 547 5600



**Nelson Bays  
Football**

[www.nelsonbaysfootball.co.nz](http://www.nelsonbaysfootball.co.nz) A District Branch of Mainland Football





**Our response to the proposed “Sinking Lid” Gambling Policy Reivew.**

**Acknowledgement of Problem Gambling:** Nelson Bays Football acknowledges that all forms of gambling, including gaming machines, can cause harm to individuals, their families and other people they come into contact with. It is however important to recognize that at any given time, between 0.3% and 1.8% of adults in New Zealand are classified as problem gamblers.

**Value of Sport and Recreation:** Any change in the sustainability of sport and recreation has a wide reaching impact on the health, wellbeing, vibrancy, social connectedness and economic resilience of the top of the South Island. For this reason we **oppose** changes to the Gambling Policy that will reduce the available funding.  
**Our Response to the Gambling Policy review:**

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<p>1. To amend the current policy on class 4 (pokie) venues by introducing a “sinking lid”</p>	<p><b>Oppose this change:</b>Based for four reasons:</p> <ol style="list-style-type: none"> <li>1. This policy change would reduce the amount of funds available to sport and recreation in our community.</li> <li>2. We are advised there is evidence that a sinking lid policy will have no impact. Despite a 30% reduction in gaming machines and revenues since 2004, New Zealand’s overall gambling market has remained constant. Gamblers simply move their gambling to other forms which has a flow on impact of less money to support local communities.</li> <li>3. There is a conflict of interest with the council controlling the number of machines and also utilising funding for Council assets from such machines.</li> <li>4. The number of machines operating in Nelson City has been steadily declining and currently sit below the cap. In December 2011 there were 248 machines operating across 18 class 4 venues vs 265 licensed to operate.</li> </ol>
<p>2. To separate the current Gambling Policy into two separate policies. The first to cover the criteria for granting or withholding consent for the establishment of pokie venues. The second to cover the criteria for granting or withholding consent for the establishment of TAB venues</p>	<p><b>Neutral:</b>We understand that this change is driven by the fact that pokie and TAB venues are governed by different legislation and hence have different issues.</p>

The areas highlighted in our submission will have a significant impact on the sport and recreation and charitable sector as the funding provided plays a key role in the sport we are able to offer, as the biggest recreational sport in the district.

We would ask that the Nelson City Council amends its policy as outlined in our submission.

Yours sincerely  
 Clive Beaumont  
 General Manager  
 Nelson Bays Football, PO Box 2105, Stoke, Nelson





Submission 51

Saxton Road East

PO Box 2161, Stoke

Nelson 7041

51

[www.nelsonsuburbs.co.nz](http://www.nelsonsuburbs.co.nz)

AMI is Principal Sponsor of  
Nelson Suburbs Football Club

08 July 2013

Gambling Policy Review  
Nelson City Council  
P O Box 645  
NELSON

**Re: Submissions on Proposed Gambling Policy Review**

My name is Gary Owen Hinks and I am the Operations Manager for Nelson Suburbs Football Club Inc and Soccer Nelson Inc. One of my roles for both organisations is to apply for gaming machine funding through various gaming trusts with machines based in Nelson.

Nelson Suburbs Football Club is based at Saxton Field in Nelson and caters for all football players, male and female, from 5 year old onwards. Soccer Nelson administers the Nelson Suburbs men's Premier League team that plays in a travelling league with Christchurch based teams. Between us we cater for approximately 350 local Nelson players to ensure they have the opportunity to play their chosen sport, winter and summer, at whatever level that may be.

I write on behalf of both organisations regarding the proposed Gambling Policy Review.

Over the last 3 years (as at end of September) Gaming Machine Trusts have contributed \$473000 to our 2 organisations which included money for facilities, coaching, playing apparel, equipment, travel, operating expenses etc. Without this funding, **which I add would not have been available from any other source**, the promotion, coaching and administration of football would be seriously affected. If we were to calculate the additional cost to our 350 parents and players, of replacing this funding, it would equate to approx. \$450 per person per annum.

I would now urge the Council to seriously consider the detrimental effects a sinking lid policy would have on community organisations, such as ours, by reducing available funding. Without this gaming funding many community groups, not just sport groups, will not survive. As a representative of the above 2 organisations I suggest that any reduction or cessation of grants to our organisations will result in parents and players not being able to afford to play football. Think of the social consequence of this. More young people on the streets more crime and more problems in our society.

Maybe the Council itself should also consider where they will find money they currently source from Gaming Trusts to carry out some of their own functions.

I question the disadvantages that are set out in the "Statement of Proposal" which states that a sinking lid "May reduce over time the return of funding to the community from charitable trusts operating pokie machines in Nelson, however it is unlikely to have a significant impact in the short term". I suggest to you that already the reduced number of gaming machines in the City is having an impact with less funding available now.

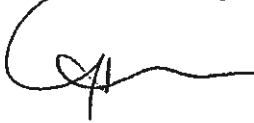
The objective set out in the current policy (from NCC website) states: "To support and promote harm minimisation principles for gaming activities within the Nelson City area". Yes there are some people who have a problem with gambling. According to figures from a 2011/2012 Preliminary NZ Health Survey **99.7% of the adult population are not categorised as problem gamblers.**

Can I suggest to you that the sinking lid policy focuses inappropriately on only the perceived harm that gambling does to our community but does not recognize that there is also a benefit to a **much larger section** of the community through gaming grants to sports, community groups and the Council itself. I suggest that the evidence shows that harm minimization issues are already being addressed by the strict controls that exist under current statute and regulations.

I urge the Council to maintain the fixed cap of 285 machines.

I thank you for the opportunity to provide this written submission and I decline the opportunity to speak to my submission.

Yours faithfully



Gary Hinks  
Operations Manager

RECEIVED  
Submission 52  
08 JUL 2013

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only	
Submission Number	52 ✓
File Ref	INITIALS

Name Josh Sutherland  
 Daytime phone 5481469  
 Address 135 Champion Road  
Richmond 7020  
 Organisation represented (if applicable) Nelson

Do you wish to be heard in support of your submission?  YES  NO # of pages

\_\_\_\_\_ If you do not tick a box we will assume you do not wish to be heard.

**Public information**

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

Gambling Policy Review

My submission is:

As a member of an organisation that benefits from charitable gaming machine funding,

- > Gaming machines have been in pubs in New Zealand for a long time.
- > Most people play machines without any problems, the money that the machines generate for our organisation is important.
- > Getting access to funding is hard enough without reducing the number of gaming machines.

I do not support the proposal by the Nelson City Council (clause 1) to place a 'sinking lid' on gaming machine numbers.

Date 7 July 2013 Signature JS Sutherland

Help with making a submission overleaf...



**Nelson City Council**  
te kaunihera o whakatu

PO Box 645 • Nelson 7040 • 03 546 0200  
www.nelsoncitycouncil.co.nz

1. A Massey University MBA project found that funding from the Lion Foundation was having a significant positive impact on the social well being of New Zealand. There seems no reason to find that the impact of other funders is less positive.
2. The Lion Foundation annual report advises that the surberid policy has contributed to many community groups being disappointed.
3. Community groups advise that that it has never been harder to obtain funds from government or corporate sponsors and there is a greater reliance on grants from gaming machines.

Lyndal

4. The Ministry of Health and Department of Internal Affairs advise that problem gamblers number between .03 and 1.8% of New Zealanders. Thus 98% of New Zealanders do not have a gambling problem.

Yet they and the community groups with which they are involved are being disadvantaged because of less than 2% - the lowest common denominator.

The majority of gamblers are simply recreational gamblers.

5. The Ministry of Health says that gambling is in decline

6. Lotto at 60% is the most common form of gambling followed by instant Kiwi at 30% and gaming machines at 10%.

4.

10%

52

Yet it is gaming machines which are constantly targeted by the anti gambling industry.

7. a Sunday led policy ignores population growth.

8. 80% of gaming machine income is distributed to the communities from which funds are derived - Lear Report.

Thus there is a need for more machines, not less to benefit the community.

9. There appears to be a biased view of Council staff that the benefits of gaming machines to <sup>98%</sup> the community are outweighed by the disadvantages to less than 2% of the community.

J. J. J. J.



5.

It seems that the staff have  
been captured by the self  
serving anti gambling lobby.

10. I have seen the submission  
made by Vernon Mardon and I  
concur with it.

JG Mardon

**Natascha Van Dien**

---

**From:** Submissions  
**Sent:** Tuesday, 9 July 2013 1:12 p.m.  
**To:** Administration Support  
**Subject:** FW: SUBMISSION TO GAMBLING REVIEW POLICY

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Yellow Category

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**From:** Errol Millar[SMTP:ERROL.TINA@CLEAR.NET.NZ]  
**Sent:** Tuesday, July 09, 2013 1:13:11 PM  
**To:** Submissions  
**Subject:** SUBMISSION TO GAMBLING REVIEW POLICY  
**Auto forwarded by a Rule**

**NELSON GREYPOWER SUBMISSION TO GAMBLING POLICY REVIEW**

No matter what the addiction, alcohol, drugs, gambling etc, addicts will find a source for their wants. If there was not one gambling machine or TAB outlet in Nelson, addicts will travel to find one. That is a fact.

Perhaps unfortunately "Pokie Machines" have become a way of life. Many organisations rely heavily on grants from the respective trusts set up to administer gambling machine profits. If this source of funds is eliminated, many clubs, societies, and community groups would be forced to seek funds from other sources, which in the main be aimed at grants from ratepayers through their local authorities, or simply fold up. This added demand on public monies would have a major impact on already unaffordable rate increases, which Nelson Greypower is totally opposed to.

The changes to the local government act require councils to concentrate on core services with a provision for "Local Public services". This category is being treated as allowing a wide range of public services but any future requests may fall short of qualifying for assistance and we implore you to think deeply about any "sinking lid policy" and the effects it will have on funding local organisations.

We do agree controls be maintained and it may be more beneficial to ensure advertising promoting machines at venues was prohibited rather than the removal of machines themselves. Most venues in Nelson have their machines in a designated area which is not visible from the street. In reality a reduction policy without a goal of total prohibition of machines and TAB outlets is really nothing more than "window dressing".

The Government has allowed a massive increase in machines in Auckland so any action taken at a local level has already been undermined. Many of those holding licences for pokies and TAB outlets rely quite heavily on these amenities to supplement their income and are financially important.

We do not support prohibition but recommend sensible controls of outlets without allowing emotional factions to influence reasonable coverage. The proximity issue is emotive but there is merit in keeping such sites well clear of places where children congregate. i.e. schools, kindergartens

To summarise, the current cap could remain but the maximum number of machines in sites reduced when ownership changes, allowing new premises to gain licences while maintaining the cap.

# Submission 62

Locations in or near residential areas MOST CERTAINLY need to take into account the “child” factor.

The reasons given for the separation of policies for class 4 gambling (Pokie) venues and NZ Racing Board (TAB) venues seems reasonable.

Errol Millar,

Chairperson

NCC Local Body Sub-Committee

Nelson Greypower

**Natascha Van Dien**

---

**From:** Submissions  
**Sent:** Monday, 8 July 2013 3:08 p.m.  
**To:** Administration Support  
**Subject:** FW: Submission - Gambling Policy Review  
**Attachments:** 4113\_001.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Yellow Category

---

**From:** Sheryl Skinner on behalf of Council Enquiries (Inquiry)  
**Sent:** Monday, July 08, 2013 3:08:28 PM  
**To:** Submissions  
**Subject:** FW: Submission - Gambling Policy Review  
**Auto forwarded by a Rule**

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**From:** Kelvin Scoble [<mailto:kscoble@jacal.co.nz>]  
**Sent:** Monday, 8 July 2013 3:03 p.m.  
**To:** Council Enquiries (Enquiry)  
**Subject:** Submission - Gambling Policy Review

Good afternoon

My submission for the **Gambling Policy Review** is attached to this email.

If you have any difficulty reading the contents of the submission, please contact me to clarify the situation.

Yours sincerely

**Kelvin Scoble**  
**Tax Consultant**  
 027 699 8444

JOHNSTON ASSOCIATES CHARTERED ACCOUNTANTS  
 Level 1 126 Trafalgar Street, Nelson 7010  
 PO Box 587 Nelson 7040  
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**From:** [copier@jacal.co.nz](mailto:copier@jacal.co.nz) [<mailto:copier@jacal.co.nz>]  
**Sent:** Monday, 8 July 2013 3:05 p.m.  
**To:** Kelvin Scoble  
**Subject:** Attached Image



NELSON CITY COUNCIL

The Nelson City Council wants your opinion.  
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only	
Submission Number	64V
File Ref	INITIALS

Name Rachael HIGGS  
 Daytime phone (03) 548 9488 <sup>no</sup> answerphone 021 026 86970  
 Address 1/212 Hampden St, Nelson 7010  
 Organisation represented (if applicable) —

Do you wish to be heard in support of your submission?  YES  NO # of pages  
 \_\_\_\_\_ If you do not tick a box we will assume you do not wish to be heard.

Public information  
 Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:  
Statement of Proposal: Gambling Policy Review

My submission is:  
In support of the Proposal (i) on Class 4 Gambling Venues to introduce a sinking lid policy - also support the new merger policy with a maximum of 18 machines (+ hopefully fewer). We know the potential harm policies can bring + for a business to rely on that source of income to survive is not acceptable.

It appears that Proposal (ii) is the best option so I also support that.

Date 8/7/13 Signature R L Higgs

Help with making a submission overleaf...



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