
ORDINARY MEETING

OF

COMMUNITY, SPORT AND RECREATION COMMITTEE

AGENDA

Time: 10.30 am
Date: Tuesday, 16 June 2015
Venue: Committee Room 1
Ground Floor, Council Offices
101 Wakefield Street
Wellington

MEMBERSHIP

Mayor Wade-Brown

Councillor Eagle (Chair)
Councillor Free
Councillor Marsh
Councillor Peck
Councillor Ritchie
Councillor Sparrow
Councillor Woolf

Have your say!

You can make a short presentation to the Councillors at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 803-8334, emailing public.participation@wcc.govt.nz or writing to Democratic Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number and the issue you would like to talk about.

AREA OF FOCUS

The focus of the Community, Sport and Recreation Committee is to build strong, safe, healthy communities for a better quality of life. It will be responsible for social infrastructure (including social housing), social cohesion, encourage healthy lifestyles, support local community events, protect public safety, and provide a wide range of recreation and sporting facilities for residents and visitors to use and enjoy.

Quorum: 4 members

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1 Meeting Conduct

1.1 Apologies

The Chairperson invites notice from members of apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

1.2 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

1.3 Public Participation

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under Standing Order 3.23.3 a written, oral or electronic application to address the meeting setting forth the subject, is required to be lodged with the Chief Executive by 12.00 noon of the working day prior to the meeting concerned, and subsequently approved by the Chairperson.

1.4 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows:

Matters Requiring Urgent Attention as Determined by Resolution of the Community, Sport and Recreation Committee.

1. The reason why the item is not on the agenda; and
2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

Minor Matters relating to the General Business of the Community, Sport and Recreation Committee.

No resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Community, Sport and Recreation Committee for further discussion.

2. General Business

REVIEW OF THE GAMBLING VENUES POLICY 2010

Purpose

1. To provide a list of submitters making oral submissions in support of their written submissions on the review of the Gambling Venues Policy 2010.

Recommendation

That the Community, Sport and Recreation Committee:

1. Receive the oral submissions.

Background

2. Under the Gambling Act 2003 and the Racing Act 2003, territorial authorities must have a class 4 (non-casino gaming machines) venues policy and Racing Board (TAB) venues policy, respectively.
3. The Council's existing policy (covering both types of venues) was adopted in June 2010 and is overdue for review.
4. On 18 March 2015 the Community, Sport and Recreation Committee agreed to release a consultation document seeking feedback on the review of the Gambling Venues Policy 2010. The document made a series of recommendations that aim to facilitate reasonable access to class 4 and TAB gambling, while taking a precautionary approach to minimising harm. Consultation ran from 20 April to 22 May 2015.
5. In total 756 submissions were received with a number of submitters indicating they wished to be heard. A schedule of submitters to be heard is attached at attachment 1 and copies of submissions received from those wishing to be heard are attached at attachment 2.

Attachments

- Attachment 1. Schedule of Submitters to Be Heard Page 8
Attachment 2. Submissions from Oral Submitters Page 10

Author	Geoff Lawson, Principal Programme Adv,Policy,
Authoriser	John McGrath, Acting Director Strategy and External Relations

Item 2.1 Attachment 1

Schedule of Submitters to be Heard

Please note that this schedule is subject to change.

Time	Name and Organisation	Submission Number	Page
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10.35	Caroline Glaser	41	94
10.40	Dr Pala Molisa	58	101
10.45	Claire Campbell	57	100
10.50	Geoff Curson, Newtown Budgeting and Advocacy	120	118
11.00	Leonie Dobbs, Tennis Central Region	32	47
11.10	Motekiai Fakatou, Methodist English Speaking Congregation	38	92
11.20	Jan Hall	44	97
11.30	Reina Harris, Salvation Army Social Policy and Parliamentary Unit	18	10
11.40	John Rawls	92	110
11.45	Graham Goodison	74	105
11.50	Kalyb Masoe-Hewitt	116	116
12.00	Michael Wemyss, NZ Racing Board	28	20
12.10	Elke Deidrichs	60	102
12.15	Emma Mawby	56	99
12.20	Maria Cotter, Wellington Branch of the Public Health Association	26	17
12.30	LUNCH		
2.00	Pesio Ah-Honi Siitia, Mapu Maia – Problem Gambling Foundation	35	51

2.10	George Darroch, Problem Gambling Foundation	36	53
2.20	Kim Abrahams	83	107
2.25	Kim Keeble	104	111
2.30	Julian Boorman	40	93
2.35	Paul Stevenson, Wellington Poverty Action	119	117
2.45	Fuailagi Samoa Saleupolu Heger	121	119
2.50	Bethany McRennan	107	112
2.55	Barney Wikitera	174	121
3.00	Afternoon Tea		
3.20	Charlotte Martin	72	104
3.35	Viliani Finau, Minister, Tongan Methodist Congregation	115	114
4.00	Bridget McFarlane	85	108
4.30	Philomena Nziramasanga	75	106
17 June 2015			
9.15	Vicki Hirini, Salvation Army Wellington Addiction Services	33	136
9.35	Sheila Reed, Age Concern	48	142
9.45	Bernard O'Shaughnessy	170	143
9.50	Martin Cheer, Pub Charity	22	125
10.00	Denise Roche, Green Party	9	123
10.10	Angela Paul, NZ Community Trust	29	27



Gambling Venues Policy
Wellington City Council

The Salvation Army New Zealand Fiji and Tonga Territory Submission

BACKGROUND

1. The Salvation Army is an international Christian and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and faith-based services, particularly for those who are suffering, facing injustice or those who have been forgotten and marginalised by mainstream society.
2. We have over 90 Community Ministry centres and Churches (Corps) across the nation, serving local families and communities. We are passionately committed to our communities as we aim to fulfil our mission of caring for people, transforming lives and reforming society through God in Christ by the Holy Spirit's power.¹
3. This submission has been prepared by the Social Policy and Parliamentary Unit. The Social Policy Unit works towards the eradication of poverty in New Zealand by encouraging policies and practices that strengthen the social framework.
4. This submission has been approved by Commissioner Robert Donaldson, Territorial Commander of The Salvation Army's New Zealand, Fiji and Tonga Territory.

¹ <http://www.salvationarmy.org.nz/our-community/mission/>

THE SALVATION ARMY PERSPECTIVE

The Salvation Army Problem Gambling Services:

5. The Salvation Army Oasis Problem Gambling Service was established in New Zealand in June 1997 in response to growing evidence that the considerable influx of gambling opportunities had a negative social impact on society. Since then the numbers of clients seeking help for gambling related problems has increased dramatically resulting in an expansion of our services across six major cities as well as satellite clinics throughout the country. We have a client base of approximately 2500 people.
6. The services we deliver are aimed at preventing and minimising gambling harm. We offer free accessible high quality client centred face-to-face counselling support and intervention for gamblers, their families and affected others. In addition, The Salvation Army delivers health promotion to minimise gambling harm in communities.

The Salvation Army Perspective:

7. The Salvation Army has persistently been engaged with the Government around gambling related harm. We continue to contend that one of the key focuses of the Gambling Act 2003 should be, as per section 3(b) of the Act, to *prevent and minimise the harm caused by gambling*. We submit that the Government and local Councils should make harm reduction a key focus of all gambling legislation and policy reforms they undertake.
8. As a provider of services to those affected by gambling harm, The Salvation Army sees the detrimental affects that problem gambling has on the wellbeing of whanau and communities around New Zealand. Aspects of the social climate created by gambling include significant harms caused in relationships, mental health and wellbeing, as well as unsustainable levels of debt. There are links between problem gambling and domestic violence and a correlation between child neglect and abuse. In relation to crime in our communities, one in every four male prisoners and one in every three female prisoners are likely to have a problem with gambling. Studies also indicate that in New Zealand and Australia that gambling is the most common motivator of fraud – with an average value of \$1.1 million per incident.

9. The Salvation Army is particularly concerned with Class 4 gaming machines, as these machines have been shown to induce the most harm. Class 4 gaming machines are also known as electronic gaming machines or pokies. The literature advocates for a number of practices to minimise and prevent problem gambling - one of the most effective and successful strategies involves limiting access to Class 4 gaming machines.

The Salvation Army perspective on the Wellington City Council policy proposals:

10. Overall, The Salvation Army opposes the policy recommendations offered by Council. We consider the proposals are significantly lacking. Wellington City Council has the legislative power and authority to be much more proactive in relation to gambling harm reduction. This significant power granted to local Councils comes from the Gambling Act 2003 where local authorities are charged with and enabled to control the growth of gambling, and prevent and minimise the harm caused by gambling. The Salvation Army encourages the Council to be more proactive in reducing gambling harms by adopting the recommendations outlined in this report.

Submissions in response to policy recommendations:

11. *Wellington Council Policy Recommendation: Continue to place maximum limits on the number of machines in most geographic areas. As with the existing policy, no limit would apply in the central city area.*
- a. The Salvation Army does not believe maximum limits are sufficient to reduce gambling harm. We strongly encourage the Council to adopt a Sinking Lid policy.
 - b. A Sinking Lid Policy with a no relocation clause would ensure no new licenses for gaming machines could be issued, and gaming machines could not be transferred to new venues. The impact would reduce the number of Class 4 venues slowly over time. Maximum limits do not reduce numbers.
 - c. We submit that the current policy of limitless Class 4 gaming machines in the Central Business District (CBD) needs to be changed. The Salvation Army contends that there is no valid reason that the people of Wellington central should have unrestricted access to Class 4 gaming machines. To follow this policy does not meet the requirement to prevent and minimise gambling harm.
 - d. We are concerned about increased access of Class 4 gaming machines to visitors to Wellington central and also the workers who come into the CBD for employment.
 - e. For workers, susceptible to the impact of gambling harm, increased access to Class 4 gaming machines creates a gambling environment within close proximity to their workplaces, and sometimes within workplaces.
 - f. The Salvation Army encourages Wellington to be the cultural capital of New Zealand. We believe the central business district is one of the key areas to showcase our culture. Class 4 machines do not enhance this culture.
12. *Wellington City Council Policy Recommendation: Lower the maximum limits that were established in the 2010 Policy so that no more than two further venues can be established in any zone. In practice this means the new limits would be the lesser of: the existing number of NCGMs in an area plus 18; or the current cap.*
- a. We applaud the Council's move to lower the maximum limits, but we submit that this policy still fails to reduce gambling harm.
 - b. We strongly advocate for Council to reduce harm reduction through the adoption of a Sinking Lid Policy.

- c. There are examples of other local Councils in New Zealand that have adopted a Sinking Lid Policy including two major cities, Christchurch and Auckland.

13. *Policy Recommendation: Allow venues to relocate and take their existing entitlement of machines with them, but only provided: they relocate to or within the central zone; or they relocate to or within an area identified as a "centre" in the Wellington District Plan; and the NCGMs at the new venue would not mean that any zone would be above its limit of machines.*

- a. We oppose this policy recommendation. We are not in favour of businesses being able to transfer their full quota of Class 4 machines to a new venue should they relocate.
- b. We encourage the Council to adopt a Sinking Lid Policy that has an emphasis on restricting venues being able to transfer entitlements. This will reduce the total number of Class 4 gaming machines over time and will be an effective and proactive way to reduce gambling harm in Wellington.

14. *Wellington City Council Policy Recommendation: Remove the requirement that only premises with an alcohol on-licence can be NCGM venues, but only where any NCGM venues without an on licence are located in "centres" identified in the Wellington District Plan.*

- a. The Council should not remove the requirement that only premises with an alcohol on-licence can be Non Casino Gambling Machine (NCGM) venues.
- b. The Gambling Act 2003 stipulates that gambling cannot be the primary business of the premises, and also requires that people under the age of 18 must not be allowed to participate in Class 4 gambling. While we agree that siting Class 4 gaming machines in licensed premises is not ideal, the intention was to protect young people. To argue that we need to widen the availability of Class 4 machines to additional venues which are not age restricted is a dangerous move, and would serve to normalise gambling. This policy would enable Class 4 machines to be placed in venues where younger (and much more vulnerable) people gather. Gambling harm seen in younger people is usually much harder to deal with, and because it occurs at a critical time in their development, can impact hugely on their whole of life outcomes.

15. *Wellington City Council Policy Recommendation: Retain the existing policy on Racing Board venues, meaning they may be established anywhere in the Wellington District, subject to the provisions of the Wellington City District Plan.*
- a. We submit that the existing policy on Racing Board venues should be changed. Racing Board venues should not be able to set up anywhere, but should be subject to restrictions as well.

The Salvation Army urges Wellington City Council to protect our most vulnerable communities

16. Gambling addiction can be found across all groups in society, but it is those groups at the lower end of the socio-economic spectrum that suffer most. Groups most likely to be in poverty and hardship include women, families, single parents, Maori, Pacific Island peoples, refugees, people with mental health issues, beneficiaries and people reliant on limited income.
17. Research illustrates some alarming statistics in relation to the location of Class 4 gaming machines in the most vulnerable communities. The Francis Group, in a 2009 report for the Ministry of Health, found that in poorer areas the ratio of Class 4 machines to people is one to 75, whereas in wealthy areas, the ratio is one machine to 465 people. The Salvation Army considers this to be inequitable and unjust. We consider that local Councils need to look closely at areas of residential deprivation and impose restrictions on the numbers of available machines in areas of high deprivation.
18. In Wellington our staff report that many Class 4 venues are situated in vulnerable communities, or are just outside, or on the margins of vulnerable communities. These vulnerable communities would be assisted by the adoption of a Sinking Lid Policy.

CONCLUSION

19. We submit that the primary way that Wellington City Council can reduce gambling harm in the community of Wellington is by regulating and limiting the use of Class 4 gaming machines.
20. We submit that the Wellington City Council needs to adopt the Sinking Lid Policy in all areas of the city.

This Submission has been written by The Salvation Army Social Policy and Parliamentary Unit.

We welcome the opportunity to present an oral submission to the Council.

For further information or discussion, please contact:

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Wellington City Council
Review of the Gambling Venues Policy 2010

May 22 2015

Submission on behalf of the Wellington Branch of the Public
Health Association

Contact details:

Ms Maria Cotter
Chair
Wellington Branch
Public Health Association
179 Daniell Street
Newtown
Wellington 6021

Tel: 021 0244 4591
Email: wellingtonpha@gmail.com

I am making this submission on behalf of the Wellington Branch of the Public Health Association (PHA)

I would like to make an oral submission

Responses to the question in the submission template

Question 1: Do you agree with the proposed changes in the draft policy?

The proposed changes include:

- Continuing to place maximum limits on the number of machines in most geographic areas. As with the existing policy, no limit would apply in the central city area. •

NO. We support the placing on maximum limits in all geographic areas. We would like the WCC to set maximum limits for the central city area also.

- Lower the maximum limits that were established in the 2010 Policy so that no more than two further venues can be established in any zone. In practice this means the new limits would be the lesser of:
 - the existing number of NCGMs in an area plus 18; or
 - the current cap

NO. We support the lowering of the maximum limits. We do not support allowing the establishment of a further two venues in any zone, which would mean an additional 18 NCGMs.

- Allow venues to relocate and take their existing entitlement of machines with them, but only provided:
 - they relocate to or within the central zone; or

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- *they relocate to or within an area identified as a “centre” in the Wellington District Plan; and*
- *the NCGMs at the new venue would not mean that any zone would be above its limit of machines.*

NO. We do not support an unlimited number of NCGMs in the central city. There would need to be much tighter controls on this provision for other zones to ensure they do not relocate into already high deprivation neighbourhoods, or further increase the density of NCGMs in vulnerable communities. We strongly urge the WCC to put in place a NCGM ‘sinking-lid policy’ for high deprivation neighbourhoods.

- *Remove the requirement that only premises with an alcohol on-licence can be NCGM venues, but only where any NCGM venues without an on-licence are located in “centres” identified in the Wellington District Plan.*

NO. We acknowledge that role alcohol plays in diminishing people’s control over their gambling behaviour. However, we strongly discourage opening up the NCGMs venues policy in a way that would allow children and young people under the age of 18 years to use or be exposed to NCGMs. We have serious concerns that the venues would not police underage access sufficiently, and that children and young people would be exposed to gambling, which would serve to normalise and increase the risk of them becoming problem gamblers in later life. Pokies are neither family friendly nor are they family entertainment.

- *Retain the existing policy on Racing Board venues, meaning they may be established anywhere in the Wellington District, subject to the provisions of the Wellington City District Plan*

NO. We would like to see the WCC put in place a maximum limit for Racing Board venues, and policies which further restrict access to forms of harmful gambling, including TABs. We have concerns about the current density and location of TABs, which are mostly in higher deprivation and vulnerable communities.

Question 2: If you disagree with any of the proposed changes in Question 1, can you provide additional information on your position?

We are concerned that the proposed policy and discussion document fails to fully recognise the harm that gambling, and in particular NCGMs, does in our Wellington community, particularly to our most disadvantaged residents. I

While recent figures show a decrease in the amount of money New Zealanders have lost on NCGMs, they continue to be some of the most harmful forms of gambling.

Two out of every five people who regularly use pokies already have a gambling problem or are at risk of developing one.

The harm caused by gambling goes beyond the player themselves. Losing money to the pokies very often means partners, children and whanau go without basic essentials. This can lead to poverty, illness, domestic abuse, crime and the breakup of families.

One in ten New Zealanders say a family member has gone without something they needed or a bill has gone unpaid because of gambling. Overwhelmingly pokies are the reason for this.

Maori and Pacific adults are about 3.5 times more likely than adults in the total population to develop gambling problems

Over 40% of the money lost on pokies comes from people experiencing gambling harm – that's nearly half the money lost on pokies coming from people who have a gambling problem.

In the last year more than \$36 million has been lost on Wellington's 679 pokies.

In Wellington, the current location of NCGMs are disproportionately located in high deprivation neighbourhoods. We ask that before the WCC Councillors vote on this policy that they each visit the NCGM and TAB venues in Kilbirnie and Newtown to see and understand who is using them.

We strongly urge Wellington City Council to place stronger limits on NCGMs as a way to improve and protect the health and wellbeing of its residents, and as a way to directly address the high rates of deprivation amongst our most vulnerable families.

Question 3: Any other suggestions of feedback

In our recent submission on the Wellington City Council's draft Long Term Plan (LTP) 2015-2025, we asked for commitment and investment to develop a shared 'Healthy Wellington Plan', to ensure we have a healthy and thriving population as our city grows into the future.

The Health Act 1956 (s23), it states "*the duty of every local authority is to improve, promote and protect public health within its district*". Gambling policy **must** be part of that "Healthy Wellington Plan". This is a key area where the WCC can make a direct and tangible difference to reducing problem gambling and the harm it does to communities and families.

Nga mihi nui

Thank you for the opportunity to make a submission.

Background to the Public Health Association

The Public Health Association is a national association, which provides a forum for information, debate and action on public health issues in New Zealand. Public health action is "*the organised efforts of society aimed at improving, promoting and protecting the health of the whole population*". Members of the PHA work in the public, private and not for profit sectors and collectively hold a high level of expertise on a range of issues that affect wellbeing. The Wellington Branch has over 100 members. Our association's vision is:

"Good health for all – health equity in Aotearoa"
"Hauora mo te katoa – oranga mo te Ao".



22 May 2015

Gambling Venues Policy Review
Wellington City Council
PO Box 2199
WELLINGTON

Submission on the Review of the 2010 Gambling Venues Policy

To the Community, Sport and Recreation Committee

1. Background

This submission is from the New Zealand Racing Board (NZRB). NZRB is an independent statutory board that operates New Zealand's official racing and sports betting agency, the TAB. NZRB employs 820 personnel and has a substantial retail network of 675 outlets nationwide.

NZRB distributes all profit back to the racing community, supporting thousands of jobs across the country. Last year NZRB distributed \$137 million back to the three racing Codes. NZRB also makes a significant contribution to the development of sport through commission we pay to national sporting bodies for sports on which we take bets (\$5 million).

1.1. Racing Industry in Wellington Region

The racing industry makes an important contribution to the Wellington region contributing \$120 million to the regional economy and supporting almost 3,400 full-time, part-time, casual and volunteer participants.

The Wellington Cup Carnival, held in January every year, is responsible for delivering more than \$8 million in economic impact to the Wellington economy. Attracting 20,000 attendees, it is an important event for inter-regional and international tourism.

1.2. NZRB Gaming

As well as operating the TAB betting business, NZRB also operates a modest gaming business representing 3.5% of the market. NZRB has held a Class 4 Operators Licence since 2011. Under the Gambling Act 2003, NZRB can only operate Class 4 gaming at a TAB Board Venue, (i.e. a venue that is either leased or owned by NZRB). This prevents NZRB from operating machines in a pub run by publican.

NZRB operates gaming in 35 sites across the country. Two of those sites are located in Wellington. Grassroots sports in the Wellington region has received over \$1.1 million in grants to clubs and sports organisations.

NEW ZEALAND RACING BOARD

106-110 Jackson Street, Petone 5012, PO Box 38899, Wellington Mail Centre 5045, New Zealand
Telephone: 0064 4 576 6999 Fax: 00 64 4 576 6942



2. Submission

NZRB welcomes the opportunity to provide a submission on the review of the 2010 Gambling Venues policy. We would like the opportunity to appear before the committee to speak to the submission.

We generally support the proposals contained in the consultation document. NZRB outlines its position on each proposal as follows:

2.1. Proposal: Continue cap on number of machines

NZRB supports this proposal.

NZRB emphasises the importance of distinguishing between the need to reduce problem gambling and more generally reducing gambling. As the Gambling Commission stated:

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

NZRB acknowledges the need to strike a balance between the benefits and harm that can come from gambling. We submit that the proposal as outlined in the consultation document strikes the right balance.

If the Council wanted to review the policy we would recommend a detailed consideration of the alternative options, experience of other territorial authorities, impact on community groups and a clear understanding of the potential outcomes before making any final policy decision.

The number of gaming machines in New Zealand has been in steady long-term decline since 2003. Since machine numbers peaked in New Zealand in 2003 at 25,221 (before the Gambling Act 2003 was passed), total machines have declined by 34%. As at March 2015 the total number of machines has reduced to 16,614.

This trend is mirrored in Wellington. Over the same period machines have decreased by 35% from 1050 to 679 machines. Since the current Council policy was introduced in 2010 machine numbers have declined 9.6% from 751 machines to 679 machines. The number of venues has dropped 12% from 50 to 44 venues.

One aspect we recommend Council consider is the long term effect of a declining number of machines on the availability of funding to community groups. Any changes Council make in this area flow through to a large number of community groups who rely on gaming funding to exist.



DIA statistics show that gaming machine proceeds in Wellington have dropped by \$2.6 million (7%) a year since the current council policy has been in place. In the four quarters to March 2015 gaming proceeds in Wellington City were \$36.2 million. Over the same period in 2010 proceeds were \$38.8 million.

The Auckland Council commissioned a study in 2012 which confirmed how essential gaming machine funding is and how difficult it would be for alternative funding to be found:

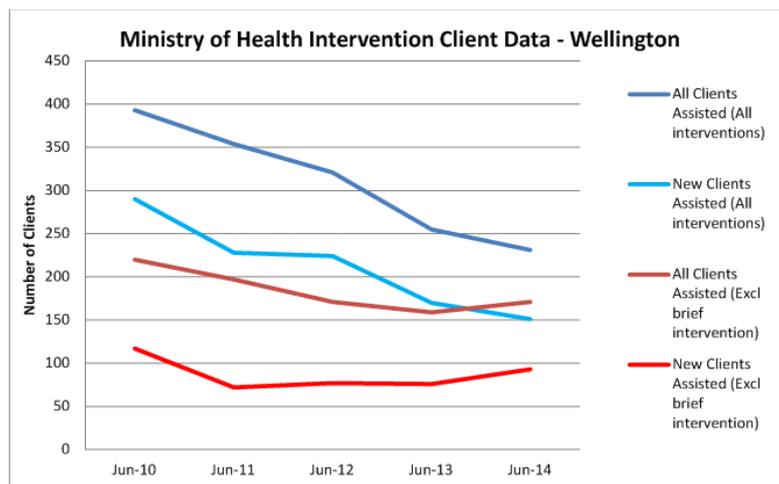
- 75% of respondents indicated their organisation is moderately or totally reliant on gaming machine funding to fund core business activities.
- 81% believed there would be a moderate to high risk to their organisation and their core business if they did not receive gaming funding.

In terms of problem gambling, the Ministry of Health keeps a record of the number of problem gambling clients who are assisted in each territorial authority. For the Wellington City area, interventions peaked during the year ending June 2010 and have declined since then.

The total number of clients assisted (including all interventions) has dropped by 41% between the year ending June 2010 and June 2014.

The number of new clients contacting the intervention service during the year has also dropped by 48% over the same period.

Excluding “brief interventions”, the number of new clients and total number of clients has dropped by over 20% across the same period.





In addition to the Wellington Council venues policy, NZRB notes that significant regulatory measures are in place to at a national level to minimise the harm from gaming. They include:

- A statutory age limit of 18
- Limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is \$2.50. The maximum prize for a non-jackpot machine is \$500 and for a jackpot linked machine is \$1,000.
- The design of the machine is highly regulated and controlled. For example a gaming machine is not permitted to generate a “near win” result.
- All gaming machines have a feature that interrupts play and displays a pop up message informing the player of the duration of the player’s session, the amount spent and the amount won or lost.
- All machines have a clock on the screen.
- All machines display the odds of winning.
- Gaming machines in New Zealand do not accept banknotes above \$20 in denomination.
- ATMs are excluded from gaming rooms
- All venues are required to have a harm minimisation policy, information on how to seek advice for problem gambling and signage encouraging players to gamble at levels they can afford.
- All venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training. NZRB contract Problem Gambling Foundation to provide these services.
- Limits on the type of venues that can host gaming machines (e.g. they cannot be located at sport stadiums, internet cafes or cinemas).

In light of this, there does not appear to be a clear need to change the cap policy.

Finally, it is worth noting that DIA undertook an analysis of the effect of various territorial authority gambling policies on non-casino gaming machines. They found that:

“different types of territorial authority Class 4 venue policies, such as sinking lids, caps and no limits on venues and gaming machines, make little difference on gaming machine numbers and expenditure in territorial authority districts. This is due to the few venue consents processed under the current framework and the large number of



gaming machines in venues that pre-date the Act that are not affected by these venue policies”.

The table below shows the change in non-casino gaming machine numbers and venues as a percentage of their 2004 number in 2011 across territorial authorities.

Changes in the Proportion of Gaming Machines and Venues by Territorial Authority

Territorial Authorities (#)		Average % of 2004 level
Sinking lids (19)	Venues	74%
	Machines	78%
Caps (37)	Venues	79%
	Machines	85%
Councils without caps or sinking lids (17)	Venues	74%
	Machines	81%
All Councils (73)	Venues	76%
	Machines	82%

DIA observed,

“On average territorial authorities had 76% of the number of venues and 82% of the gaming machines compared to 2004. Comparing territorial authorities with different type of policies shows that there is very little difference in the average reduction from 2004. Territorial authorities with sinking-lid policies had on average 74% of the number of venues and 78% of the number of machines in their districts compared to 2004, while territorial authorities without caps or limits had 74% of the number of venues compared to 2004 and 81% of the number of gaming machines”.

DIA also examined expenditure in three council areas with sinking lid policies and found “while these policies achieved some decrease in gaming machine profit, it is not uniform and not necessarily in line with the decrease in gaming machine numbers in each city”.

2.2. Proposal: Lower the maximum limits on gaming machines

NZRB accepts this proposal.

NZRB notes the proposal reduces the total NCGMs permitted under the cap by 10% in the 5 zones. This is a substantial decrease in the context of a long-term decline of NCGMs in the Wellington region.



2.3. Proposal: Allow venues to relocate

NZRB supports this proposal.

Allowing venues to relocate is both administratively more efficient and allows providers a degree of flexibility in responding to changing communities. We consider the restrictions set out in the consultation document are reasonable and preserve the overall intent of the policy.

Allowing relocation has a number of benefits:

- Giving owners the ability to relocate away from undesirable areas such as residential areas to more desirable areas such as centres.
- Assisting operators in moving away from high deprivation areas.
- Allowing venues to move out of buildings that may be earthquake prone.
- Allowing owners to relocate to new, modern and refurbished premises.

2.4. Proposal: Remove the requirement for an on-licence for NCGM venues

NZRB supports this proposal.

The current policy requires gaming machine venues to have a liquor licence. In effect this excludes NZRB from applying for licences as TAB board venues are alcohol free. NZRB objects to this policy for three reasons.

First, NZRB considers the absence of alcohol to be a positive for harm minimisation. The link between alcohol and problem gambling is well documented.

- Gambling Commission: "problem gamblers were four times more likely to have potentially hazardous drinking patterns than non-problems gamblers".
- Professor Max Abbott, "two or more alcoholic drinks increased reports of difficulty in resisting urges to gamble. Continued consumption during a gambling session also predicted unplanned, extended gambling".
- A study by Baron and Dickerson found that two or more alcoholic increased reports of difficulty in resisting urges to gamble. They study also found that continued alcohol consumption during a gambling session resulted in unplanned, extended gambling.
- The Ministry of Health found that problem gambling was significantly associated with current smoking and hazardous alcohol consumption. Compared to people with no gambling problems, problem gamblers had:



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

Second, this requirement is out of date and represents an attempt to impose an age restriction on people playing gaming machines. This is no longer required given the Gambling Act 2003 expressly imposes an age restriction.

Finally, the on-licence requirement is also out of step with other local authority policies across the country. Of 67 councils, only 6 prohibit TAB Board Venues hosting gaming machines. Wellington is the only city that has the prohibition in place. In addition, allowing NZRB to conduct gaming is consistent with the

2.5. Proposal: Retains the existing policy on Racing Board venues

NZRB supports this proposal.

NZRB operates 7 TAB Board Venues in Wellington. This number has remained static over the past 3 years. Retaining the current policy provides NZRB with a degree of flexibility in ensuring the retail network is fit for purpose. While over the past 5 years betting in New Zealand has grown modestly at 2.7% in real terms, betting turnover from the retail network has dropped as customer preferences shift:

- Retail share of total betting turnover has dropped from 52% to 42%
- Total retail betting turnover has dropped 6%.

This trend is reflected in Wellington as well with betting turnover at TAB Board venues down by 5.8% over the past 5 years. NZRB has no current plans to extend this network.

3. Contact Details

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

22 May 2015

Executive summary

The purpose of the pub gaming sector is to raise funds for the community.

In 2013/14 alone, the sector raised \$242 million for thousands of worthwhile sports and community groups. Many of these groups depend on pub gaming to survive¹ so it is important this fundraising system is sustainable. Unfortunately during the last 10 years the pub gaming sector has seen a significant decline:

- The number of pub gaming venues has reduced from 1,850 to 1,287 (a 30% reduction)
- The number of gaming machines operating has reduced from 22,231 to 16,717 (a 25% reduction)
- Pub gaming revenue has fallen from \$1,035 million to \$808 million (a 22% reduction)²

As a result, pub gaming funding for the community has reduced by approximately \$90 million each year for the past 10 years (based on an average return of 40%).

One of the contributors to this decline is the inflexibility of some council gambling policies, based on the erroneous belief that limiting gaming machine numbers will limit problem gambling. In actual fact, despite the 25% reduction in gaming machine numbers during the past 10 years, New Zealand's problem gambling rate has remained consistently low (around 0.3% of the population). The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006"³.

Latest research⁴ suggests that when it comes to preventing and minimising gambling harm, the *location* of gaming machines is more important than the *number* of gaming machines operating. Therefore NZCT:

- **Supports** the proposal to allow gambling venues to relocate to or within Wellington's CBD or other 'central' zones.
- **Supports** the continuation of an 'open' policy with regards to gaming machine numbers in the CBD.

Current market demand means the proposal to reduce the number of new gaming venues that could operate in suburban areas is unlikely to alter gaming machine numbers *at this stage*. However, we can see no tangible benefit from introducing this new limit other than potentially limiting future fundraising opportunities. Therefore NZCT:

- **Opposes** the proposal to reduce the number of new gaming venues that can be established in Wellington's suburban areas.

¹ Pg iii, Community Funding Survey, Point Research 2012, 75% of survey participants indicated their organisation is moderately or totally reliant on gaming funding to fund core business. 55% said there would be a high to extreme risk (and a further 26% said there would be a moderate risk) to their organisation and their core business if they did not receive this funding.

² DIA statistics

³ Pg 7, New Zealand 2012 Gambling Study: Gambling harm and problem gambling.

⁴ Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland, Gambling & Addictions Research Centre, AUT University, 2012

About NZCT

What we do

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

At least 80% of the funds we distribute are directed towards sports activities, making NZCT the largest funder of amateur sport in New Zealand. We focus on sport because of the many positive benefits it offers communities, such as:

- crime reduction and community safety
- economic impact and regeneration of local communities
- education and lifelong learning
- participation
- physical fitness and health
- psychological health and wellbeing
- social capital and cohesion⁵.

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

Who we are

We are proud of our robust grants system and of the quality of people involved with NZCT. All our trustees⁶ are highly-regarded business and community leaders with extensive governance experience (you may be aware that Kerry Prendergast, former mayor of Wellington, has been an NZCT trustee since 2011).

Our trustees are supported by an experienced staff and eight Regional Advisory Committees (RACs) who add local knowledge and insight to our grant decisions. Our Wellington RAC reviews and makes recommendations on grant applications submitted by organisations in your region.

This committee comprises Paul Elenio (former Fairfax general manager), Kevin Wilson (Sport Wellington's leadership and governance senior advisor) and Francie Russell (former Wellington Community Trust chief executive). Each committee member has a strong interest in sport and wide networks which enable them to provide funding recommendations based on local feedback.

⁵ Sport England's Value of Sport Monitor.

⁶ Alan Isaac (NZCT chairman, professional director and sports administrator), Peter Dale (former Hillary Commission chief executive), David Pilkington (professional director), Kerry Prendergast (former mayor of Wellington) and Lesley Murdoch (Olympian and former New Zealand cricket captain, broadcaster).

Current situation

In most countries, gambling is purely for commercial gain. New Zealand is different. We are one of only a few countries in the world with a 'community owned' model for pub gaming, where the net proceeds are returned to the community instead of to the private sector. Unfortunately, during the past 10 years the sector has experienced a significant decline:

- The number of pub gaming venues has reduced from 1,850 to 1,287 (a 30% reduction)
- The number of gaming machines operating has reduced from 22,231 to 16,717 (a 25% reduction)
- Pub gaming revenue has fallen from \$1,035 million to \$808 million (a 22% reduction)

This means pub gaming funding for the community has reduced by approximately \$90 million each year for the past 10 years (based on an average return of 40%).

Wellington's gaming machine numbers

Wellington's gaming sector has declined in line with national trends. Department of Internal Affairs (DIA) gambling statistics⁷ show there are currently 44 venues and 681 gaming machines operating in Wellington City. This equates to a 25% reduction in gaming venues since 2007 (when 59 venues were operating) and a 19% reduction in gaming machine numbers since 2007 (when there were 836 machines).

The Class 4 sector faces multiple challenges

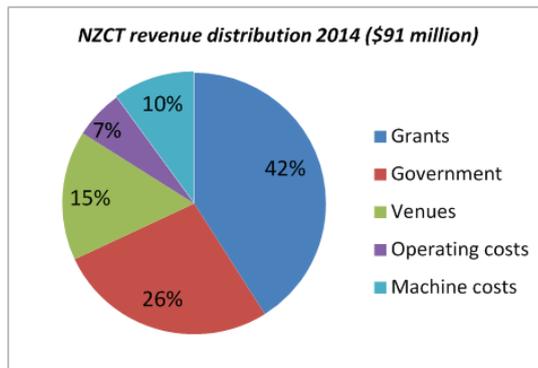
The Class 4 gambling sector is vulnerable to a number of new cost pressures. These may contribute to (or indeed speed up) the market decline noted above.

1. Increased minimum return

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

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

It is highly likely many societies will be forced to shed their lower performing gaming venues in order to achieve the new percentage return. Such venues are typically located in provincial towns – so it is likely some regions will see a significant reduction in gaming revenue (and therefore community grants) in the coming months.



⁷ DIA website, Gaming machines venues and numbers by region at 31 December 2014

Within the gaming sector, there is a concern that the increased percentage requirement will result in a lower overall dollar amount being returned to the New Zealand community via gaming grants.

2. Proposed fee increase

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

3. Increased competition

During the past four years, other modes of gambling (casinos, Lotteries products and the New Zealand Racing Board (NZRB)) have seen revenue increases – Lotto by an impressive 33%. While the Lotteries Commission does return funds to the community, casinos' profits go directly to their shareholders and the majority of NZRB distributions are directed towards the racing industry⁸.

In addition, the public has access to many overseas gambling websites where they can spend their entertainment dollar. While many Lotto and NZRB products are available online, the Class 4 gambling sector is prohibited from operating in the online space.

4. High compliance requirements

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

5. Imminent one-off costs

The introduction of new bank notes in 2015 and 2016 will require societies to outlay considerable costs in terms of the software and hardware required for gaming machine note acceptor upgrades. For NZCT alone the cost of this project is in the order of \$1 million.

In addition, by December 2015 all gaming machine jackpots must be downloadable. Each conversion from a manual to a downloadable jackpot costs somewhere between \$3,000 - \$20,000 to implement at a gaming venue. Based on today's number of venues (1,287), this project has added a cost burden to the sector in the order of \$3.8m - \$25m.

As a result of these two projects, societies have fewer funds available for distribution to the community.

⁸ Pg 6, NZRB Annual Report 2014 reports \$137.4 million total distributions, of which \$134.1m (97%) was directed to racing.

Our position

In the following pages we provide six key reasons why NZCT supports the continuation of the existing 'open' policy in the CBD, but opposes the proposal to limit the number of gaming venues in the suburbs. We also provide four reasons for supporting the proposed relocation clause.

Reasons to allow market forces to determine the number of gaming operations in Wellington:

1. Gaming machines are a legal and valid entertainment choice

Pub gaming brings many benefits to New Zealand. Business and Economic Research Ltd (BERL) research⁹ has calculated that each year the entertainment value to recreational players is circa \$250m, the grants value to the community is circa \$250m, and the government revenue value in the form of duties and levies is circa \$190m.

We recognise that Wellington City Council aims, through its Long Term Plan, to balance the needs of visitors and residents while achieving economic development. We support this objective and believe a vibrant hospitality sector is a key component to achieving this.

As long as the games are played responsibly (which they are - as noted on page 36 of your consultation document), pub gaming is a valid and enjoyable source of entertainment for residents and tourists alike. Most players regard it as light entertainment and know when to stop.

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

Local hospitality

NZCT operates 13 gaming venues in Wellington's CBD¹⁰, one in Miramar (The Cutting Sports Bar) and one in Kilbirnie (The Corner). These businesses contribute to your local economy, employing staff and providing hospitality options for residents and tourists alike.

The proposal to lower the maximum limit of venues operating in the suburban zones will hinder local business owners' future service offerings. As long as the number of machines remains under the existing caps, we believe there is no need for the council to intervene with the venue numbers.

As mentioned above, the Class 4 market is naturally declining, so we suggest it would be prudent to remove any restrictions which would negatively impact the future of this funding model.

⁹ Maximising the benefits to communities from New Zealand's Community Gaming Model, BERL, February 2013

¹⁰ The Backbencher Pub & Café, Bad Grannies, Corner Bar 169, Featherston Bar & Grill, Four Kings, The Grand, The Green Man, JJ Murphys, Lovelocks Sports Bar, Public and the Stadium Bar.

Community funding

NZCT has always been a strong supporter of Wellington sports organisations. In recent years we have also helped WCC fund several significant sports facilities - and we continue to support the council's Youth in Sport programme and annual Dragon Boat Festival (\$1,050,000 allocated to these activities since July 2012).

In the 12 months to May 2015 NZCT's gaming venues generated \$4,010,816 for distribution to authorised purposes. During this time we distributed \$3,278,300 directly to local organisations via 196 grants (see Appendix 1 for details). Approximately ten percent of the funds generated in Wellington were allocated to national organisations that provide local benefits throughout the country (eg: Life Fight Trust, Spirit of Adventure and Coastguard NZ).

NZCT funding benefits many thousands of people every year. To help us explain how our funds are used and who benefits from them, we encourage grant recipients tell us what they've achieved using with our help. Here are *just four* examples from the 196 local grants we've recently approved:

College Sport Wellington, Grant # 58465 (\$45,000 towards salaries)

College Sport Wellington is responsible for the ongoing delivery of a multicode sporting programme to 26,500 young people (13-18 years) in 39 secondary schools in Greater Wellington.



Wellington Netball Centre, Grant # 61880 (\$35,000 towards salaries)

Netball Wellington Centre is currently the third biggest centre in New Zealand with a base of 7,956 players, 400 coaches, 150 umpires, 15 bench officials, and up to 3,000 spectators and volunteers involved throughout its three satellites and two centre hubs.



Athletics Wellington, Grant #60863 (\$25,000 towards salaries)

One of the events the organisation's development officer runs is the annual Kids Cross Country Series - where children in years zero to eight can compete in one or several races held throughout the winter months.



Poneke Rugby Club, Grant #60311 (\$100,000 towards facility upgrade)

Poneke rugby club is extremely grateful to NZCT for helping our rugby club deliver positive community results in the wider Kilbirnie / Eastern Suburbs region over many years.

With over 300 children and 200 adults playing rugby for our club, our wider membership touches over 1,000 people, including families. The regular NZCT support for our coaching co-ordinator, jerseys and other playing equipment, makes the difference between our ability to deliver our services, or otherwise.

Our recent initiative to develop our building into a true "Community Hub", which is making great progress, has only been possible through the support of NZCT.

Within the next 6 months, our traditional rugby clubrooms will be host to multiple sports clubs and community groups and meetings, filling a much needed gap in the Eastern Suburbs. Images of our recently renovated clubrooms are attached.

Regards,

Ross Jamieson
Poneke Football Club
021 875031
rossdjamieson@gmail.com

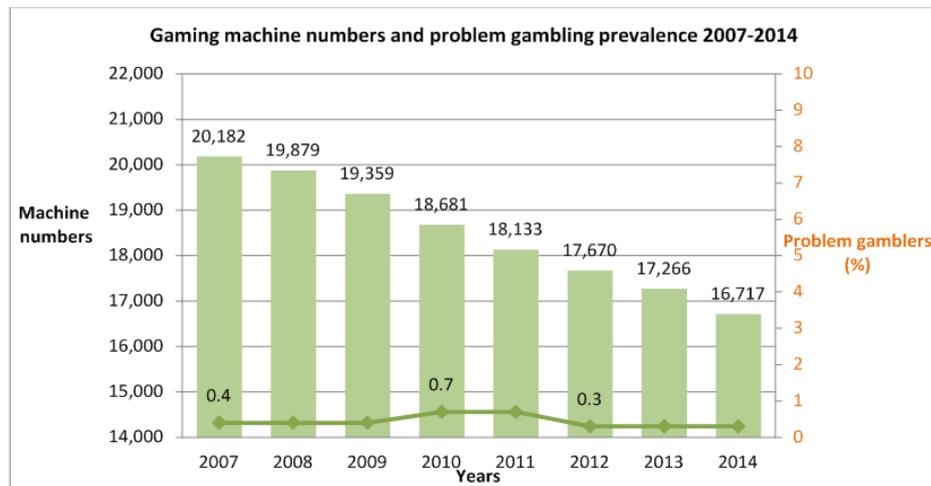


Difference between societies, clubs and NZRB

It is worth noting that the pub gaming model differs from clubs and NZRB. Those entities are able to apply funds to their own purposes (eg: maintaining clubrooms or funding race meetings), but Class 4 societies like NZCT must distribute funds to community groups. In its 2014 annual report, NZRB advised its distributions totalled \$137.4 million, with 97% of these funds (\$134.1 million) used for racing purposes.

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

It is misleading and inaccurate to assume that fewer gaming machines will result in fewer problem gamblers. A gambling addiction is a complex psychological condition, which is influenced by many factors. As shown in the graph below, a reduction of nearly 4,000 machines across the country between 2007 and 2014 had almost no impact on the small percentage of problem gamblers nationally.



In the 2006/07 Ministry of Health NZ Health Survey 0.4% of the population were categorised as problem gamblers using the Problem Gambling Severity Index (PGSI), in 2009/10 it was 0.7%, and in the 2011/12 survey it was 0.3% of the population. The latest survey findings are based on a sample size of 9,821 adults aged 15 years and over.

Problem gambling rates have plateaued

The latest problem gambling statistics come from the New Zealand 2012 National Gambling Study. This research found that the number of people who regularly participate in continuous forms of gambling (like gaming machines) has decreased from 18% in 1991 to 6% in 2012.¹¹ The study concluded that “Problem gambling and related harms probably reduced significantly during the 1990s but have remained at about the same level despite reductions in non-casino EGM [electronic gaming machine] numbers and the expansion of regulatory, public health and treatment measures.”¹²

¹¹ Pg 8, NZ 2012 National Gambling Study: Overview and gambling participation

¹² Pg 18, *ibid*

4. Problem gambling rates in New Zealand are relatively low

NZCT is committed to reducing and minimising the harm that can be caused by gambling. Thankfully, as can be seen in the table below, New Zealand has one of the lowest rates of problem gambling in the world¹³. The fact is relatively few New Zealanders are gambling at levels that lead to negative consequences. The majority of people who gamble know when to stop.

Country	Problem Gambling Prevalence (% population*)
New Zealand	0.3
UK	0.6
Norway	0.7
Australia	0.5 – 1.0
USA	2.3
Canada	2.6
*Mixture of CPGI, PGSI and SOGS scores ¹⁴	

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

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

Strict harm minimisation obligations

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

- Stake and prize money is limited
- Odds of winning must be displayed
- Gaming rooms are restricted to people over the age of 18 years
- Gaming rooms can only be operated in adult environments (eg: pubs, nightclubs, clubs)
- Play is interrupted every 30 minutes with an update on how long the player has been at the machine, how much money they’ve spent and their net wins/losses

¹³ Maximising the benefits to communities from New Zealand’s community gaming model, BERL, February 2013

¹⁴ A range of different measurements are available to measure problem gambling rates. CPGI refers to the Canadian Problem Gambling Index, PGSI is the Problem Gambling Severity Index and SOGS is the South Oaks Gambling Screen.

- \$50 and \$100 notes are not accepted
- No ATMs are allowed in licensed gambling areas
- Gaming advertising is prohibited
- The DIA monitors every gaming machine's takings
- Syndicated play is prohibited
- All venues must have staff trained in gambling harm minimisation on duty whenever gaming machines are operating
- All venues must have a gambling harm minimisation policy in place
- All venues must display pamphlets and signs directing gamblers to help services
- Venue staff must be able to issue and enforce Exclusion Orders.

NZCT's harm minimisation activities

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

- NZCT's Harm Prevention and Minimisation Policy
- Exclusion Orders and guidance on the Exclusion Order process¹⁵
- A Harm Minimisation Incident Register to record any problem gambling issues and action taken by staff, and
- Problem gambling pamphlets for distribution.

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



Training

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

6. Support is available for problem gamblers

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

¹⁵ As of 11 May 2015 NZCT is enforcing 71 Exclusion Orders in Wellington City (Public (12), The Corner (10), The Green Man (10), The Grand (9), JJ Murphys (6), Stadium Bar (5), The Backbencher Pub & Café (4), Corner Bar 169 (4), The Cutting (4), Four Kings (4), Featherston Bar & Grill (3)) for people who have elected to ban themselves from our gaming venues.

Encouragingly, two of the findings from the inaugural PMGH baseline report were: problem gambling services are effectively raising awareness about the harms from gambling and; interventions for gambling-related harm are moderately accessible, highly responsive and moderate to highly effective¹⁶.

It is also pleasing to note that the world's largest clinical trial¹⁷ for problem gambling treatment found that, one year after calling the Gambling Helpline, three-quarters of callers had quit or significantly reduced their gambling. This research provides a level of assurance for local communities, councils and the government.

Reasons to allow gaming operations to relocate within Wellington:

1. Relocation policies provide sensible options

Research¹⁸ by Auckland University of Technology shows that problem gambling behaviour is influenced more by the *distance* to the nearest gambling venue, rather than the *number* of gambling venues within walking distance. The Ministry of Health's 2013 Gambling Resource for Local Government acknowledges this point and states that one of the major factors associated with increased prevalence of problem gambling is 'location and/or density of gambling venues and machines'¹⁹. The Ministry of Health also found 'being a problem gambler is significantly associated with living closer to gambling venues'.²⁰

Allowing gaming operations to move out of high deprivation areas could potentially diminish gambling harm for at-risk communities.

2. Support local hospitality businesses

Relocation policies also help ensure the continual improvement and growth of your local hospitality sector. Rather than tying gaming operations to a physical address, which may over time become a less desirable location, relocations allow gaming operators to move their operations to more suitable premises. The DIA has recommended relocation policies as a way of allowing territorial authorities to 'future proof' their Class 4 gambling policies²¹.

Relocation policies also help the hospitality sector respond to consumer demand for attractive and safe entertainment environments. This is particularly important if premises are deemed unsafe or unusable for a lengthy period of time (eg: in the event of a fire or earthquake). And they incentivise building owners to upgrade their premises in order to attract and retain quality tenants (hospitality and gambling operators).

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

¹⁷ The Effectiveness of Problem Gambling Brief Telephone Interventions, AUT, Gambling & Addictions Research Centre

¹⁸ Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland, Gambling & Addictions Research Centre, AUT University, 2012

¹⁹ Pg 21, Ministry of Health Gambling Resource for Local Government, 2013

²⁰ *ibid*

²¹ Internal Affairs Policy Briefing 3: Options for improving territorial authority gaming machine policies, 28 March 2013.

3. Respond to future demand

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

4. Appropriate benefit/responsibility

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

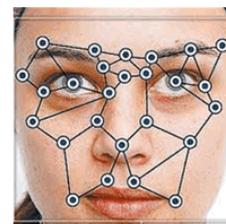
What does the future hold?

Online gambling a growing trend

In the United Kingdom about the same proportion of gamblers who play gaming machines in person, play online²². Unfortunately the NZ Health Survey does not cover online gambling, but we can assume the numbers here are not too different to the UK. This is a major concern for the gaming sector and your community. Not only is there no help available for online gamblers, but the money gambled does not return any funds to the community or the government.

Harm minimisation tool being trialled

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



²² British Gambling Prevalence Survey 2010, the Gambling Commission

Summary

We appreciate Wellington City Council wants to do its best to protect its residents from any potential harm that may be caused by gambling. Thankfully New Zealand has a relatively low problem gambling rate and there is effective help available to those who need it.

The Class 4 gambling sector exists to generate funds for the community. This model is working well, with thousands of Wellingtonians benefitting from the financial support we provide to their local community and sports groups.

Unfortunately the Class 4 gambling sector, and therefore the money it generates for the community, is declining. If current trends continue, there could be a real funding shortfall for such groups in future. Our view is that it is unnecessary and undesirable to place any further restrictions which could limit the ability of gaming societies to generate community funds.

Recommendations

Our recommendations are that the council:

- **Accepts** the proposed relocation clause and allow gambling venues to relocate to and within Wellington's CBD and other 'central' zones.
- **Retains** the current maximum limits on venue numbers, so business operators have the ability to offer gaming as an entertainment choice for patrons in future.

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

Angela Paul
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Appendix 1: NZCT Wellington Grants

In the 12 months to 7 May 2015, NZCT approved \$3,278,300 via 196 grants to sports and community groups in Wellington. We also funded a range of national organisations that provide benefits to Wellington residents (for example Special Olympics NZ (\$225k), NZ Olympic Committee (\$200k), Life Flight Trust (\$250k), Outward Bound Trust (\$75k), Spirit of Adventure Trust (\$75k) and Netball NZ (\$250k)).

Organisation	Amount	Purpose
All Kiwi Sports Club Inc	\$ 100,000	Towards various costs associated with the staging of 2015 Men's Cycle Classic
Athletics Wellington Inc	\$ 25,000	Towards salary of Development Manager from March 2015
Badminton Wellington Inc	\$ 20,000	Towards salaries from March 2015 plus shuttles and equipment
Bandolier Marching Club Inc	\$ 1,000	Towards accom for Masters team attending Marching NZ National Champs in Christchurch
Big Cheer Inc	\$ 2,000	Towards venue hire, staging, sound and lighting for event in Kilbirnie
Bowls Wellington Greenkeeping Assn	\$ 5,000	Towards purchase of agri-chemicals
Bowls Wellington Inc	\$ 17,500	Towards salary of CEO from November 2014
Brandon Intermediate School	\$ 1,000	Towards uniforms and transport to 2014 AIMS Games in Tauranga, September 2014
Britannia Sea Scout Group	\$ 12,000	Towards Sunburst boats and sails
Brooklyn 1909 Scout Group	\$ 2,500	Towards purchase of camping and training gear
Brooklyn Cricket Club	\$ 4,000	Towards cricket balls and gear for 2014/15 season
Brooklyn Northern United A F C	\$ 6,000	Towards coaching and ground hire from 20 May 2014 (excludes pre-season)
Brooklyn Smallbore Rifle Club	\$ 3,000	Towards sights, bipods, shooting jacket, glove, sling, telescope and soft-sided carry case
Cancer Soc of N Z Wellington Division	\$ 17,500	Towards hire of marquees for Relay For Life event in Wellington, March 2015
Cansurvive Dragon Boat Team Inc	\$ 3,000	Towards inflatable rescue boat and motor
CanTeen Wellington	\$ 5,000	Towards salaries of key youth workers from January 2015 (excludes expenses)
Capital BMX Club Inc	\$ 50,000	Towards construction of main track at Ian Galloway Park
Capital Swim Club Inc	\$ 15,000	Towards salary of Coaches, Assistant Coach and Director of Coaching from January 2015
Central Region Rowing Development Trust	\$ 40,000	Towards RDO, plant and equipment
Central Zone Deaf Rugby Union	\$ 3,000	Towards accom and flights to Christchurch for 23rd NZ National Deaf Rugby Championship
Challenge 2000 Trust Inc	\$ 5,000	Towards salary of Activities Based Learning Co-ordinator from January 2015
College Sport Wellington	\$ 45,000	Towards salaries of Sport Managers from October 2014
Creative Capital Arts Trust Inc	\$ 3,000	Towards stage and lighting for the Swan Dancehall at CubaDupa festival in March 2015
Cricket Wellington Inc	\$ 175,000	Towards salaries of Community Cricket team and CEO from November 2014
Cricket Wellington Inc	\$ 25,000	Towards salaries of Community Cricket staff from June 2015
Crofton Downs Primary School	\$ 600	Towards netball dresses, bibs and shorts (excludes bags and fleecy tops)
Dash Marching Club	\$ 1,000	Towards accommodation to attend National Marching Championships in Christchurch
Eastern Suburbs Cricket Club	\$ 25,000	Towards cricket gear and balls, and salary of Club Manager from September 2014
Evans Bay Yacht & Motor Boat Club Inc	\$ 5,000	Towards purchase of Opti training boats

Fencing Central Inc	\$	3,000	Towards Head Coach and Assistant Coaching contracts from May 2015
Fiji Football Assn Wellington	\$	1,000	Towards ground hire for IDC Tournament in October 2014
Harbour City Hockey Club Inc	\$	10,000	Towards turf fees for 2015 season
Hutt City United Softball Club Inc	\$	1,500	Towards ground hire for softball tournament in Lower Hutt
Hutt Valley Dodgers Softball Club Inc	\$	2,500	Towards travel and accom at NZ Women's Open Club Champs in Chch March 2015
Island Bay Softball Club Inc	\$	3,000	Towards uniforms and equipment for Juniors
Island Bay Tennis & Squash Club Inc	\$	5,000	Towards equipment only
Johnsonville Cricket Club Inc	\$	15,000	Towards cricket coaching from 1 October 2014
Johnsonville Lawn Tennis Club	\$	2,000	Towards junior tennis coaching from October 2014
Johnsonville Rugby Football Club Inc	\$	15,000	Towards salary of CCO from May 2015
Johnsonville Softball Club Inc	\$	3,000	Towards playing softball uniform
Junior Cricket Upper Hutt Inc	\$	1,000	Towards purchase of cricket gear
Kaibosh	\$	1,000	Towards salary of Volunteer Manager from 15 July 2014
Kaibosh	\$	4,000	Towards salary of Volunteer Manager from March 2015
Karori Cricket Club Inc	\$	2,000	Towards training facility hire, cricket balls, gear, and pitch covers
Karori Cricket Club Inc	\$	10,000	Towards playing equipment and salary of Club Development Officer from November 2014
Karori Junior Cricket Club	\$	4,000	Towards equipment
Karori Knights Softball Club	\$	2,000	Towards playing uniforms
Karori Lawn Tennis Club Inc	\$	900	Towards tennis balls
Karori Netball Club Inc	\$	1,000	Towards Coaching fees and court hire from June 2014
Karori Netball Club Inc	\$	1,500	Towards coaching and court hire from 16 February 2015
Karori Table Tennis Club	\$	1,800	Towards hall hire from 16 June 2014
Karori United Tennis Club Inc	\$	3,000	Towards purchase of tennis balls for 2014-15 season
Karori West Scout Group	\$	7,500	Towards flooring for scout hall
Khandallah Tennis & Squash Club Inc	\$	1,000	Towards van hire, accom and uniform for Nat Squash Tournament in Cambridge, Oct 2014
Khandallah Tennis & Squash Club Inc	\$	1,000	Towards junior coaching for Term 1 2015
Kilbirnie Tennis Club Inc	\$	900	Towards tennis balls
Kiwi Athletic Club Inc	\$	500	Towards equipment and management costs of 2014/15 athletics season
Lyll Bay Surf Life Saving Club Inc	\$	5,000	Towards salary of Coaching Coordinator from November 2014
Mahinawa Specialist School and Resource Centre	\$	1,000	Towards purchase of physiotherapy equipment
Makara Peak Mountain Bike Supporters Inc	\$	4,000	Towards equipment for maintaining track network at Makara Peak
Maranui Surf Life Saving Club Inc	\$	8,000	Towards cadet boards for junior members
Maranui Water Polo Club Inc	\$	3,500	Towards pool hire from 20 May 2014
Maranui Water Polo Club Inc	\$	3,500	Towards pool hire from May 2015
Marist A F C Inc	\$	4,000	Towards playing uniforms (excluding jackets) and coaching from June 2014
Marist A F C Inc	\$	5,000	Towards uniforms, ground levy, and coaching from April 2015

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Marist St Pats Rugby Football Club Inc	\$	20,000	Towards salary of Development Officer from December 2014
Mary Potter Hospice	\$	10,000	Towards salaries of Occupational Therapist and Social Worker from June 2014
Miramar Golf Club Inc	\$	2,000	Towards coaching for Junior Academy from November 2014
Miramar Rangers Assn Football Club Inc	\$	20,000	Towards replacement of lights and poles at training ground
Miramar Rangers Assn Football Club Inc	\$	20,000	Towards replacement of lights and poles at training ground
Miramar Softball Club Inc	\$	1,000	Towards ground and umpire fees from January 2015
N Z Choral Federation Wellington Region	\$	5,000	Towards venue and technical costs for Big Sing Regional Festival in June 2014
N Z Police Pipe Band Inc	\$	5,000	Towards equipment
Netball Wellington Centre Inc	\$	40,000	Towards salaries of centre staff from 20 May 2014
Netball Wellington Centre Inc	\$	40,000	Towards salaries of General Manager and Programme Coordinator from March 2015
Netball Wellington Centre Inc	\$	35,000	Towards salaries of Games Coordinator and Netball Dev Coordinator from May 2015
Newlands College	\$	5,000	Towards travel and Accommodation for Winter Tournament Week
Newlands Intermediate School	\$	5,000	Towards tennis nets and hockey goals for artificial turf facility
Newlands Softball Club	\$	4,000	Towards clubroom rental and equipment storage from 20 October 2014
Newtown Carols Trust	\$	4,000	Towards security and sound system for Govt House Newtown Carols 29 November 2014
Ngaio Lawn Tennis Club Inc	\$	2,000	Towards junior tennis coaching from October 2014
No 5 District Federation of NZ Soccer Inc	\$	17,000	Towards travel, accom and ground hire, for NZ Football National Age Group Tournament
No 5 District Federation of NZ Soccer Inc	\$	170,000	Salaries of CEO, Finance Mgr, Comms Mgr, Junior Ops, FD Administrator from Nov 2014
No 5 District Federation of NZ Soccer Inc	\$	20,000	Towards balls, bus hire for away games, vehicle leases and salary of Development/Goalnet Coordinator from April 2015
North Wellington Assn Football Club Inc	\$	5,000	Towards artificial turf training costs for 2015 season
North Wellington Junior Football Club Inc	\$	3,000	Towards salary of Club Manager
Northern United Rugby Football Club Inc	\$	10,000	Towards salary of Club Coaching Coordinator from September 2014
Onslow Amateur Athletic Club Incorporated	\$	2,500	Toward coaching and event support
Onslow College	\$	2,000	Towards cricket balls
Onslow Historical Soc Inc	\$	10,000	Towards Manager of Archives from May 2015
Onslow Junior Football Club and North Wellington Junior Football Club - 2 Clubs	\$	15,000	Towards salary of Coaching Director from 18 August 2014
Oriental Rongotai Football Club Inc	\$	20,000	Towards salary of Club Coaching Coordinator from January 2015
Oriental Rongotai Football Club Inc	\$	60,000	Towards uniforms, training equipment, ground hire, medical supplies and bus hire
Parafed Wellington Inc (formerly Wellington Paraplegic & Physically Disabled Assn Inc)	\$	5,000	Towards venue hire, uniforms, van and truck hire (excluding fuel), and airfares and accommodation for Wheelchair Rugby tournaments from 24 March 2015
PIC Netball Club	\$	3,000	Towards playing netball uniforms
Poneke Football Club Inc	\$	2,000	Towards ground hire from 20 May 2014
Poneke Football Club Inc	\$	20,000	Towards salary of Club Coaching Coordinator from November 2014(excludes expenses)
Poneke Football Club Inc	\$	100,000	Towards upgrade of a multi-purpose clubroom facilities
Poneke Football Club Inc	\$	100,000	Towards upgrade of multi-purpose facilities for Toitu Poneke Sports Complex

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Poneke Football Club Inc	\$	4,000	Towards purchase of playing jerseys for juniors
Poneke Kilbirnie Softball Club Inc	\$	4,000	Towards playing softball uniforms
Primary Sport Wellington Inc	\$	20,000	Towards salary of Director of Sport from January 2015 (excludes expenses)
Queen Margaret College Inc	\$	7,000	Towards transport and accommodation costs for teams attending Winter Tournaments
Queen Margaret College Inc	\$	5,000	Towards travel and accom for summer tournament expenses from 16 February 2015
Rongotai College	\$	15,000	Towards playing uniform, equipment, travel and accom to tournaments from July 2014
Royal Port Nicholson Yacht Club Inc	\$	20,000	Towards salaries of permanent and part time instructors
Royal Port Nicholson Yacht Club Inc	\$	25,000	Towards salaries of perm and part-time coaching instructors and Admin from March 2015
Saints Ltd	\$	150,000	Towards travel, accom, uniforms, and venue and court hire for 2015 season, and coaching from March 2015
Salamanca Tennis Club Inc	\$	1,000	Towards tennis balls and court hire from 15 July 2014
Samuel Marsden Collegiate School	\$	2,000	Towards travel and accommodation at Senior Tournaments in September 2014
SCANZ - T S Amokura	\$	5,000	Towards a new safety boat
Seatoun Assn Football Club Inc	\$	10,000	Towards first stage of clubroom upgrade
Skylight	\$	20,000	Towards office rental costs from July 2014
South Wellington Seido Karate	\$	5,000	Towards salary of Club Administrator from October 2014
Sport Wellington Region Inc	\$	60,000	Towards costs of running Round the Bays in February and Wellington Sports Awards in June 2015
Squash Wellington Districts Inc	\$	10,000	Towards salary of Squash Development Manager from 15 July 2014
St Catherines College	\$	5,000	Towards sports uniforms for rugby, netball and football teams
St Marys College Wellington	\$	3,000	Towards accommodation and vehicle hire (excludes school van) for North Island tournaments
St Marys College Wellington	\$	2,000	Towards travel and accommodation only to attend a Regatta in Cambridge
St Marys Old Girls Netball Club Inc	\$	3,000	Towards indoor training costs from April 2015
St Patricks College Wellington	\$	2,000	Accom for Senior Basketball team to attend NZ Schools Nationals in Palmerston North
St Patricks College Wellington	\$	1,500	Towards cricket balls
Swimming Wellington Inc	\$	15,000	Towards salary of Events and Admin Support from July 2014
Table Tennis Wellington Inc	\$	2,000	Towards venue hire from 20 May 2014
Talavera Municipal Tennis Club Inc	\$	5,000	Towards installation of floodlighting
Tawa College	\$	7,000	Towards vehicle hire and accommodation to various NZSS tournaments in North Island
Tawa Intermediate	\$	2,000	Towards accommodation and van hire (excludes school van) to Aims Games in Tauranga
Tawa Squash Club Inc	\$	5,000	Towards replacement of roof
Team Wellington Soccer Inc	\$	15,000	Towards salaries, equipment, ground charges, playing strip and video analysis from December 2014
Tennis Central Region Inc	\$	100,000	Towards salaries of key frontline roles and new General Manager from Dec 2014
Titahi Bay School	\$	2,000	Towards cost of construction of the skills extension features for bike track
Titahi Bay Surf Lifesaving Club Inc	\$	2,500	Towards accommodation to attend Surf Life Saving Nationals in Gisborne, March 2015
Twisters Tawa Gymnastic Club Inc	\$	5,000	Towards landing mats and mirrors

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Upper Hutt Rugby Football Club Inc	\$	10,000	Towards salary of Club Coaching Coordinator
Victoria University Cricket Club Inc	\$	3,500	Towards playing uniform and equipment
Victoria University Netball Club	\$	5,000	Towards playing netball uniforms and equipment
Victoria University of Wellington A F C	\$	2,000	Towards footballs for 2015 season
Victoria University of Wellington Hunters RLC Incorporated	\$	7,500	Towards playing jerseys, shorts and socks for junior's
Vincents Art Workshop Inc	\$	3,000	Towards salary of Coordinator from May 2015
Vogelmorn Tennis Club	\$	1,500	Towards coaching from term 1 2015
Wainuiomata Tennis Club Inc	\$	1,000	Towards coaching from December 2014
Waterside Karori A F C Inc	\$	15,000	Towards training ground hire, and coaching from June 2014
Waterside Karori A F C Inc	\$	5,000	Towards coaching and ground hire
Waterside Karori A F C Inc	\$	40,000	Towards Coaching from May 2015
Wellington Basketball Assn Inc	\$	25,000	Towards salaries of Office Mrg, League Commissioner, Dev Officer and Admin from 15 July
Wellington Basketball Assn Inc	\$	30,000	Towards salaries of Development Officer and Administration staff from March 2015
Wellington Brass Band Inc	\$	5,000	Towards purchase of musical instruments
Wellington City Council	\$	250,000	Towards Youth in Sport programme and annual Dragon Boat festival
Wellington City Mission Anglican Trust Board	\$	25,000	Salaries of four Mission staff from their Community Services programme
Wellington College	\$	15,000	Towards coaching of the school's rugby teams and coaches from 23 March 2015
Wellington College Old Boys and Victoria University of Wellington Rugby Football Club Inc	\$	20,000	Towards salary of Coaching Coordinator from February 2015
Wellington Collegians Cricket Club Inc	\$	10,000	Towards cricket balls for 2014/15 season
Wellington Darts Assn Inc	\$	2,000	Towards dartboards and stands
Wellington Diving Club Inc	\$	15,000	Towards salary of Head Coach from November 2014
Wellington East Girls College	\$	6,000	Towards accommodation and van hire for Winter Tournament Week
Wellington Fencing Club Inc	\$	2,000	Towards purchase of wireless scoring machines
Wellington Floorball Club Inc	\$	1,000	Towards venue hire of ASB Sports Centre from 17 June - 30 June 2014
Wellington Floorball Club Inc	\$	5,000	Towards purchase of floorball gear and equipment
Wellington Football Club Inc	\$	20,000	Towards salary of Coaching Coordinator from November 2014
Wellington Football Club Inc	\$	7,500	Construction of physiotherapy hot/cold tubs, repairs to gym & door installation, breakdown equipment
Wellington Free Ambulance Service Inc.	\$	100,000	Towards an ambulance
Wellington Girls College	\$	10,000	Towards travel and accommodation for teams to compete in various tournaments
Wellington Handball Federation	\$	2,000	Towards court hire for Wellington Secondary Schools handball league in term 4
Wellington Harrier Athletic Club Inc	\$	3,500	Towards accommodation costs in Christchurch
Wellington Harrier Athletic Club Inc	\$	900	Towards annual track and field levy for Newtown Park
Wellington Heat Basketball Inc	\$	2,000	Towards gym hire from March 2015

Item 2.1 Attachment 2

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Wellington Hockey Assn Inc	\$	30,000	Towards salaries of Operational staff and Chief Executive Officer from June 2014
Wellington Hockey Assn Inc	\$	25,000	Towards salaries of CEO, Community Hockey Mr, Hockey Officer and admin from Oct 2014
Wellington Hockey Assn Inc	\$	30,000	Towards salaries from January 2015
Wellington Hospitals Foundation	\$	8,000	Towards merino wool for Hospital Volunteer Knitters
Wellington Jazz and Music Festival Trust	\$	5,000	Towards technical/marketing costs for Festival in Wellington in June 2015
Wellington Kiwitag Football Inc	\$	2,500	Towards playing shirts, shorts and socks
Wellington Municipal Croquet Club Inc	\$	900	Towards a set of hoops
Wellington Pony Club Inc	\$	1,500	Purchase of representative tops and jackets
Wellington Red Hackle Pipe Band Inc	\$	2,000	Towards purchase of drums
Wellington Regional BMX Association Inc	\$	1,000	Towards hire of a marquee for BMX NZ National Champs in Christchurch, April 2015
Wellington Regional Orchestra Foundation Inc	\$	5,000	Towards salary of Concert Master and Music Director from May 2015
Wellington Repertory Theatre Inc	\$	1,000	Towards hire of theatre for staging of 'The Addams Family - The Musical'
Wellington Riding for the Disabled Assn Inc	\$	15,000	Towards salaries of Operations Manager and Senior Coach from March 2015
Wellington Roller Skating Club	\$	1,800	Towards venue hire from May 2015
Wellington Rugby Football Union Inc	\$	200,000	Towards 2014/15 Club Coaching Coordinator Programme from November 2014
Wellington Rugby League Zone of NZRL Inc	\$	100,000	Towards salaries from January 2015
Wellington Scottish Athletics Club Inc	\$	2,000	Towards vehicle hire for NZ road relay championships in Christchurch
Wellington Smallbore Rifle Assn Inc	\$	1,000	Towards accommodation for 2015 Teams of Ten Match in Dannevirke, May 2015
Wellington Softball Assn Inc	\$	50,000	Towards travel, accommodation, salary for representative teams for 2014/15 season
Wellington Somali Council Inc	\$	1,000	Towards playing uniforms (excluding shoes)
Wellington Speedway Society Inc	\$	3,000	Safety improvements to spectator seating
Wellington Water Polo Centre Inc	\$	20,000	Towards salary of Development Officer from November 2014
Wellington Youth Choir Inc	\$	1,000	Towards van hire for Waikato tour in August 2014
Wellington Youth Sailing Trust	\$	25,000	Towards Youth sailing scheme costs from 20 October 2014
WellTrust	\$	5,000	Towards salary of Counsellor from June 2014
WRFKA Berhampore Kindergarten	\$	1,000	Towards soft fall bark for play area
WRFKA Newtown Kindergarten	\$	500	Towards multicultural educational resources
Y W C A Hockey Club Inc	\$	3,000	Towards turf fees from 17 April 2015
YMCA Greater Wellington Charitable Trust	\$	2,000	Towards salary of Junior Sports Leagues Coordinator from June 2014
YMCA Greater Wellington Charitable Trust	\$	2,000	Towards volleyball equipment
Youth Development Trust Wellington Inc	\$	5,000	Towards salary for Regional Manager and Programme Coordinator from January 2015
	\$	<u>3,278,300</u>	



Submission to the:
WELLINGTON CITY COUNCIL

on the:
WELLINGTON CITY COUNCIL REVIEW OF THE GAMBLING VENUES POLICY 2010

Submission from:
TENNIS CENTRAL REGION (INC.)

This submission is representing the 3,000+ members of Tennis Central Region Inc. that reside in Wellington City.

Date:
22 May 2015

Representatives of Tennis Central Region (Inc.) wish to discuss the main points in this written submission at a hearing.

Address for contact:
Tim Shannahan
Chief Executive Officer
Tennis Central Region Inc.
Email: tim@tenniscentral.co.nz
Mobile: 021 126 3322

Introduction

Tennis Central Region (Inc.) is one of six regional tennis organisations recognised by Tennis New Zealand as responsible for the delivery of grass-roots tennis. Created in 2007, Tennis Central Region services the lower part of the North Island, specifically Taranaki, Manawatu, Wanganui, Wairarapa, Kapiti Mana, Hutt Valley and Wellington. Just under half of the Tennis Central Region's 7,000+ participants are Wellington City residents. These participants belong to twenty tennis clubs operating across Wellington City.

The Benefit of Gaming Proceeds to Sport & Recreation

As stated in the Sport New Zealand report 'Gaming Funding into the Sport and Physical Activity/Recreation Sector 2012', prepared in March 2014, "Funds from gaming remain an important source of income for the sector, with grants from all the gaming machine societies estimated to contribute \$100 million annually."

Sport and recreation is considered to be a quintessential element of New Zealand society. It is generally accepted that sport and recreation provides significant benefit to the New Zealand public. By engaging in sport, all New Zealanders access benefits including:

- Enhanced levels of physical fitness;
- Enhanced social skills and confidence;
- Enhanced self-esteem;
- Enhanced teamwork and leadership; and
- Enhanced self-discipline and goal setting abilities.

In the event of any level of reduction in Class 4 gaming machine funding to sport and recreation the sector will be required to make critical decisions that will either result in reduced sport and recreation services being provided to the general public or increased costs of participation to the general public. For this reason Tennis Central supports the overarching intent of the Council's revision of the Gambling Venues Policy. The capacity to retain existing gaming machine numbers means that the funding available to the sector is likely to remain similar, which benefits all sport and recreation clubs.

Furthermore, the intent to retain similar levels of gaming machines in each zone of Wellington City is also supported. Given some gaming trusts attempt to distribute funds within the area in which they are generated it is important to ensure that there is a reasonable spread of gaming machines across Wellington City and specifically within each ward. As a regional sport organisation Tennis Central has an obligation to make this statement on behalf of its affiliated clubs to ensure that all of them remain the beneficiaries of gaming machine proceeds in the future.

The Gambling (Gambling Harm Reduction) Amendment Bill of 2012 identified as one of its recommendations that funding be allocated within the ward in which the funds were generated. Given the potential for similar legislation to be contemplated in the future, it is important to the sustainability of the sport and recreation sector that gaming machines continue to be operated in all wards of Wellington City. By doing so, the Wellington City Council is actively protecting all sport and recreation clubs within its boundaries from the potential loss of a critical revenue source.

Acknowledgement of Problem Gambling

Tennis Central acknowledges that all forms of gambling, including Class 4 gaming machines, can cause harm to individuals, their families and the wider community. With between 0.3% and 1.8% of adults in New Zealand classified as problem gamblers at any time according to the paper 'Problem Gambling in New Zealand - A Brief Summary' (<http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf?file/ProblemGamblingFactsFinal.pdf>), it is recognised that problem gambling is an issue. Any efforts to address problem gambling should be given due consideration. The considered position of the Wellington City Council to recognise that gaming machines are only one form of gambling and that a reduction in the number of gaming machines may not address the issue of problem gambling is endorsed. A significant reduction in gaming machines may achieve nothing from a problem gambling perspective, but would significantly impact the sustainability of sport and recreation.

Conclusion

Tennis Central supports the proposed revisions to the Wellington City Council's Gambling Venues Policy.

Ensuring that the number of gaming machines can at least remain at similar levels as present ensures that vital funding to the sport and recreation sector remains in place. Until such time as an appropriate alternate source of equivalent funding for sport and recreation as is currently being provided by gaming machine proceeds is identified, no revisions to the Gambling Venues Policy that would reduce the number of gaming machines across Wellington City or in specific wards within the City should be contemplated.

Submission to the Wellington City Council

Review of the 2010 Gambling Venues Policy and Proposed New Policy

Mapu Maia is the Pacific Unit of the Problem Gambling Foundation of NZ and we were established in 2009 to address the needs of the Pacific community. We provide culturally appropriate services that are effective and relevant to the needs of individuals, families and communities. We work within the Pacific community in the Auckland and Wellington regions.

Our commitment to providing an appropriate and relevant Pacific service is demonstrated through:

- Qualified Pacific team of practitioners based in Auckland and Wellington
- Over 40 years combined experience working in clinical and public health roles within the Pacific community
- Evidence based practices and delivery
- Innovative and creative approach to service delivery – “back door” approaches
- Robust collaborative partnerships with communities services and agencies
- Active roles in providing advice and advocacy to local and central government on gambling, alcohol and smoking
- Mapu Maia delivers a holistic Pacific service integrating public health and clinical practice.

We wish to address our concerns of the Wellington City Council Proposed Gambling Policy for the reasons below:

1. We see the harm of pokie machine addiction in our Pacific community every day in the families and in particular the children that come into our service. We know the devastating affect that gambling addiction can have on relationships, employment, finances and sense of wellbeing.
2. Pacific people are four times more likely to experience a problem with gambling than the general population.
3. Pacific people have become the most-at-risk ethnicity to develop problem or pathological gambling behaviours. They are also at the high risk of other health and social problems including alcohol and drugs.
4. Research shows that Pacific have bi-modal gambling patterns, which means there are fewer gamblers, but those who gamble are spending disproportionately larger amounts of money (\$13,468 per annum per person) compared to Europeans (\$1,761), Maori (\$1,908) and Asians (\$2,829).
5. Over 40% of the money lost on pokies comes from problem gamblers.

There are many different contributing factors to Pacific people gambling, one being the accessibility of gambling venues in their community. The easy access of machines in bars and venues in local communities enables gamblers to play at their convenience. Research shows that Pacific people when asked felt that easy access to pokies in pubs and gambling venues contributed to problem gambling, and exposure to advertising about Lotto, the casino and the TAB on TV, radio, newspapers and on the Internet normalised gambling and emphasised luck in winning.

We believe that education and awareness of problem gambling go hand in hand with robust community policies that ensure that communities are safe and healthy. Council has an opportunity to make this happen for Wellington.

We work with many Pacific clients whom we have assisted to undertake multi-venue exclusions as well as self-banning themselves from casinos. This is by where they make an application to the venues to ban their access to the gaming area. Their photo is taken and a series of documents are

signed. This also involves the Department of Internal Affairs and the Trusts. This drastic action for them seems the only alternative in their battle to overcome gambling addiction.

Submission

- We do not support the removal of liquor licenses requirements for venues
 - We do not support the relocation of gaming machines or gaming licenses
 - We do not support the continued establishment of TAB venues within Wellington region
 - We believe that community funding will not be affected in the short term with a sinking lid policy. We support a more robust and transparent system of the distribution of community funding from Trusts.
-
- We fully support a "sinking lid" policy to help reduce gambling venue numbers over time, and therefore reducing gambling harm.

I wish to make an oral submission to the council.

Regards

Pesio Ah-Honi Siitia

Pacific Manager, Mapu Maia

National Public Health Manager

Problem Gambling Foundation of NZ

148 Cuba St, Te Aro, Wellington





**Submission on the
Wellington City Council
Gambling Venue Policy**

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EXECUTIVE SUMMARY

Electronic gambling machines (pokies) are not a harmless product that a few “weak willed” individuals need help with. These machines are designed to addict and are doing significant harm, which is why 2 in 5 regular gambling machine users develop a problem at some point. The 1-2% of our population experiencing direct—and often severe—harm from gambling is just the tip of the iceberg.

Each person with a gambling problem affects about 5-10 others. This means as many as 500,000 people are affected by the significant economic, health, personal, and social costs that gambling problems cause in New Zealand. The harms caused by gambling problems extend beyond individuals, affecting their families, friends, workmates, businesses and our community. For example, a study of gambling machines in Christchurch suggested that gambling machines in the region resulted in lost economic output of \$13 million, lost household income of \$8 million, and lost employment for 630 full-time equivalents.

How do we begin making changes? It’s obvious. We know that gambling machines are the major cause of gambling harm in New Zealand and have been identified as the main gambling mode of problem gambling clients seeking help. We know that a significant amount of the money lost in gambling machines—about 40-60%—is lost at the expense of people with gambling problems. We know these machines are concentrated in low-income areas.

Councils can make a difference. “Sinking lid” policies will help reduce gambling machine venue numbers over time, reducing availability and accessibility to gambling machines, and therefore reducing gambling harm. Seventeen Councils around New Zealand have taken the lead and introduced “sinking lid” policies; these include Auckland and Christchurch. They have been backed by the overwhelming majority of public opinion; that these machines are socially undesirable and that there should be fewer of them.

A “sinking lid” policy is a modest policy that only prevents new venues being allowed gambling machines. The strongest sinking lid policies state that when venues close those machines can’t be re-allocated elsewhere. In the absence of policies that give communities and Councils more power (such as being able to remove existing licences from poor or deprived communities), “sinking lid” policies are the best policies that Councils can introduce to minimise gambling harm in their local area.

It’s also important to remember that just 16% of adults use pub/club gambling machines over a 12 month period. And even fewer people (1% once a week, 6% once a month or more) use them on a regular basis. The vast majority of adults (84%) never use gambling machines.

We’ve assembled the information that follows from a vast body of research. We have included information from government agencies, government-commissioned reports, and peer-reviewed journals so that you have the best body of evidence possible to inform your decision. We have also included some less formal local information that we think you will find valuable.

Please do not hesitate to contact us if you have any questions.

RECOMMENDATIONS

- The Problem Gambling Foundation recommends that the Council adopt a “sinking lid” policy: a district wide ban on any additional class 4 gambling venues or machines (reduction in the number of venues and machines over time as a result of existing venues closing and machines not being re-licensed). A “sinking lid” policy would reduce the number of venues over time but would not affect existing venues or current community funding in the short term. A district-wide ban on any new venues or machines would reduce the harm caused by gambling, including the social and economic harm.
- The Wellington City Council does not remove the requirement that liquor licenses are a condition of pokie venue licenses. While alcohol has the potential to cause harm alongside gambling, such a removal is unlikely to cause widespread removal of alcohol licenses in pokie-containing venues (pubs and clubs).
- Instead, new venues (such as bowling alleys or other entertainment venues) would be allowed to host pokies, expanding access and putting machines in front of new audiences.

A ban on transfers is preferred

- Allowing venues to transfer will not lead to a reduction of venues, and therefore will not reduce harm from gambling in the way that a strong “sinking lid” policy would.

a) A ban on any new venues and machines is preferable to a cap

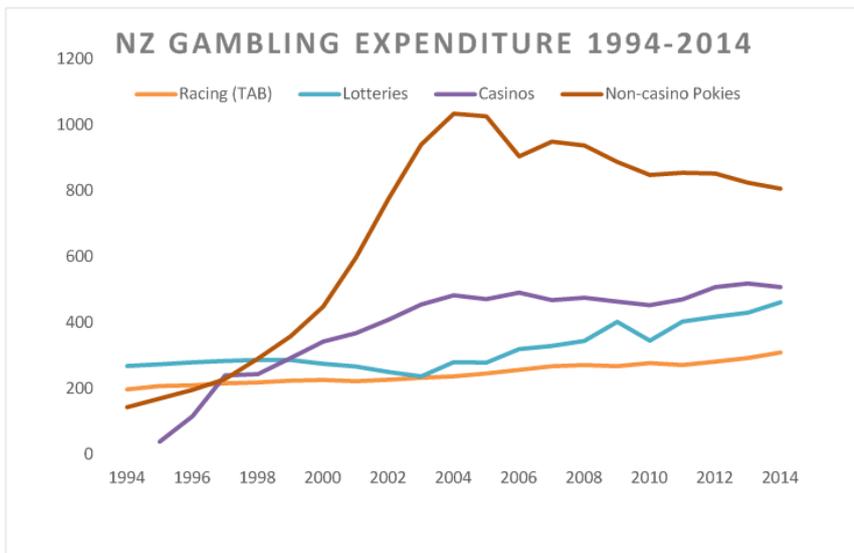
- A ban on any new venues and machines is preferable to a cap. It is possible that a cap on machine numbers or venues may result in a greater number of licensed venues and machines being located in poorer communities (i.e. venues shift from more prosperous localities, suburbs and town centres).

b) Restricting the number of venues is even more crucial than the numbers of machines

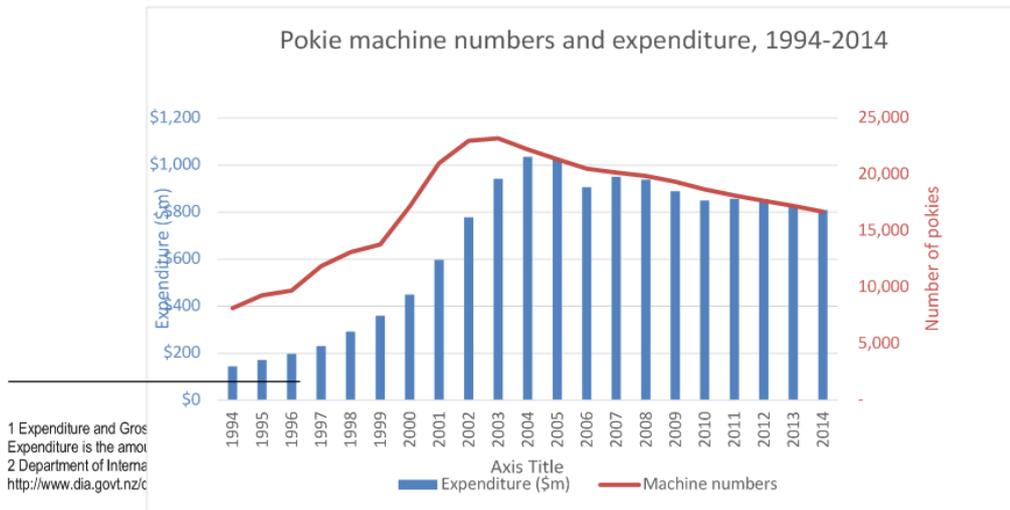
- It is likely that when gambling venues are widely dispersed throughout the community, they pose a bigger hazard for problem gambling than when they are concentrated in a few locations.
- Additionally, the restriction of venues is appropriate in Wellington because there are already a number of accessible machines in both deprived areas and the central city. Australian research has shown that venue caps are more effective than machine caps in moderating the accessibility drivers of problem gambling.

CONTEXT AND SUMMARY OF LOCAL STATISTICS

- Gambling expenditure¹ has expanded rapidly in New Zealand during the last 20 years. Gambling expenditure nearly quadrupled from \$482 million in 1990 to \$2.091 billion in 2014.² Of that amount, nearly 40% is lost to non-casino gambling machines, making it the largest of the four main gambling sectors.



- In the 2013/14 financial year, total gambling expenditure for the four main sectors increased 0.9% from the previous year due to an increase in expenditure on Lotteries and racing products.
- A decrease in machines has led to a gradual decrease in expenditure, following the



¹ Expenditure and Gros
Expenditure is the amor
² Department of Interna
<http://www.dia.govt.nz/c>

introduction of the Gambling Act 2003.

- New Zealand lost \$808 million to non-casino gambling machines last year, or \$2.21 million a day.
- This money is worth about 55 million minimum wage hours.
- Wellington lost \$36 million to non-casino gambling machines in the last year, or \$99,000 per day.
- Wellingtonians lost on average \$184 per adult. But just a small minority of adults use pokies in any year – 13.6% of adults. Losses per user are likely to be \$1352 per user, with problem gamblers spending much more than this.
- Estimates are that 1-2.5% of the population in New Zealand are problem gamblers or moderate-risk gamblers³ at any particular time.⁴ Based on these estimates approximately 1800 to 4500 people in Wellington could be problem or moderate risk gamblers.⁵
- There are also a significant number of people who are harmed by someone else's gambling. It is estimated that at approximately 5-10 people are adversely affected to varying degrees by behaviour from a person experiencing problem gambling.⁶ This could see between 10,000 and 20,000 people harmed from others' gambling in Wellington.⁷
- Over 74,000 people in New Zealand (2.4% of the population) would expect to have a better state of mental health if there were no gambling.⁸ Of these, 69,500 would benefit from stopping gambling on gambling machines. In Wellington, this is around 4400 people.
- Submissions by the New Zealand Community Trust and other gambling machine trusts have attempted to down-play the number of local problem gamblers by reporting the number of people who have sought help for gambling within the Council area. There is a difference between the number of people with gambling problems and the number of people who have sought help for those problems; it is

³ The term "problem gambler" refers to someone who scores 8 or more on the Problem Gambling Severity Index, and is defined as "Problem gambling with negative consequences and a possible loss of control." The term "moderate-risk gambler" refers to someone who scores 3-7 on the PGSI, and is defined as "Moderate level of problems leading to some negative consequences". The two terms are often combined when reporting prevalence of problem gambling.
⁴ Based on the New Zealand 2012 National Gambling Study, which reports that "0.7% of adults (23,504 people) are current (past 12 months) problem gamblers experiencing significant problems, and a further 1.8% (60,440) are moderate-risk gamblers, experience some gambling-related harms and at risk for the development of more serious problems". Source: Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2014). *New Zealand 2012 National gambling study: Gambling harm and problem gambling*. Wellington: Ministry of Health. Retrieved from https://www.health.govt.nz/system/files/documents/pages/national_gambling_study_report_2.pdf.
⁵ Statistics New Zealand. (2006). About a Place – Quick Stats. Retrieved 19 January 2012 from <http://www.stats.govt.nz/Census/2006CensusHomePage/QuickStats/AboutAPlace.aspx>
⁶ The 2006/2007 New Zealand Health Survey found that "almost 3% of people had experienced problems due to someone's gambling in the previous 12 months, and this is consistent with overseas studies that estimate that between 5 and 10 people are affected by behaviour of a serious problem gambler." Ministry of Health. 2009. Preventing and Minimising Gambling Harm: Consultation document. Six-year strategic plan; three-year service plan; problem gambling needs assessment; and problem gambling levy calculations. Wellington: Ministry of Health. Retrieved 19 January 2012, from [http://www.moh.govt.nz/moh.nsf/pages/mh/9057/\\$File/gambling-harm-consultation-jul09.pdf](http://www.moh.govt.nz/moh.nsf/pages/mh/9057/$File/gambling-harm-consultation-jul09.pdf)
⁷ The Australian Productivity Commission estimated 5-10 people (average: 7.3) were impacted by problem gambling. Productivity Commission. (1999). Australia's Gambling Industries, Report No. 10, AusInfo, Canberra, Vol 1, p. 7.34
⁸ Statistics New Zealand. (2006). About a Place – Quick Stats. Retrieved 19 January 2012 from <http://www.stats.govt.nz/Census/2006CensusHomePage/QuickStats/AboutAPlace.aspx>
⁹ Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 19 January 2012 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

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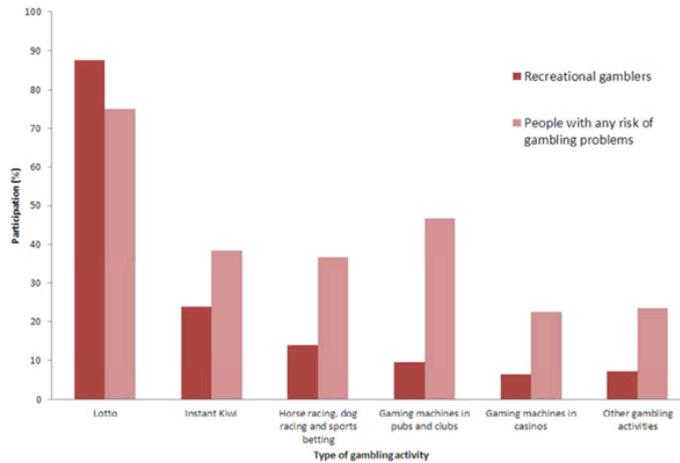
a gap we are seeking to close, and it is not a gap any of us can ignore. Those who seek help are just the tip of the iceberg both in terms of those with problem gambling but also in terms of the wide impact that problem gambling has on the community.

GAMBLING AND PROBLEM GAMBLING

GAMBLING MACHINES ARE THE PROBLEM

- Just 13.6% of adults use pub/club gambling machines over a 12 month period.⁹
- This means the \$808 million that gambling machines took last year doesn't add up from many people putting in a few coins. This figure would require each gambling machine user to spend—and lose—an average of over \$1,400.¹⁰
- Even fewer people use gambling machines on a regular basis (1% once a week, 3.4% once a month or more). The vast majority of adults (86%) never use gambling machines.¹¹ Regular users lose much more than the average \$1,400, and this is where the harm is concentrated.
- The number of people who gamble on non-casino gambling machines is small compared to the number of people who find that form of gambling socially undesirable.¹²
- While 13.6% may not seem like a lot, this number means much bigger problems; there is a serious concern for the 13.6% of the population that uses pokie machines because of the risk involved with gambling machine use.¹³

Proportion participating in various forms of gambling: recreational gamblers compared to gamblers at any risk of gambling problems



9 Tu, D. (2013). New Zealanders' participation in gambling: Results from the 2012 health and lifestyles survey. Wellington: Health Promotion Agency. Retrieved 29 April 2015 from http://www.hpa.org.nz/sites/default/files/2012_gambling_participation_report_final.pdf

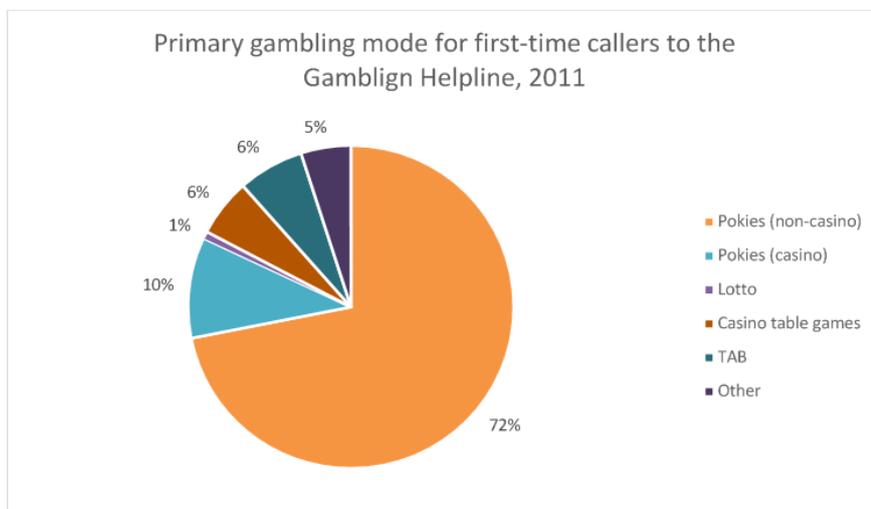
10 Based on approximate population (with adults as 15+), rendering a slightly more moderate figure. Estimates from Statistics New Zealand (2014). National Population Estimates: At 30 June 2013. Retrieved 30 June 2014 from http://www.stats.govt.nz/browse_for_stats/population/estimates_and_projections/NationalPopulationEstimates_HOTJun11qtr.aspx

11 Tu, D. (2013). New Zealanders' participation in gambling: Results from the 2012 health and lifestyles survey. Wellington: Health Promotion Agency. Retrieved 29 April 2015 from http://www.hpa.org.nz/sites/default/files/2012_gambling_participation_report_final.pdf

12 Department of Internal Affairs (2008). Peoples participation in, and attitudes to, gambling, 1985-2005. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/\\$File/GamblingParticipationSurvey1985-2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/$File/GamblingParticipationSurvey1985-2005.pdf)

13 Ministry of Health (2012). Problem Gambling in New Zealand: Preliminary Results from the New Zealand Health Survey. Wellington: Ministry of Health. Retrieved 29 January 2013 from <http://www.health.govt.nz/system/files/documents/publications/problemgambling-preliminary-findings.pdf>

- Gambling machines are no ordinary commodity; it is estimated that:
 - 2 in 5 (40%) of regular gambling machine users (participates weekly or more) report experiencing a problem.¹⁴
 - 1 in 5 (20%) of regular gambling machine users have current problems.¹⁵
- Non-casino gambling machines are the major cause of gambling harm in New Zealand (to individuals as well as the community). Non-casino gambling machines are the main gambling mode of problem gambling clients seeking help. In the most recently published Gambling Helpline report¹⁶:
- 72% of callers to gambling helpline counselling services cited non-casino gambling machines as their primary mode of gambling.

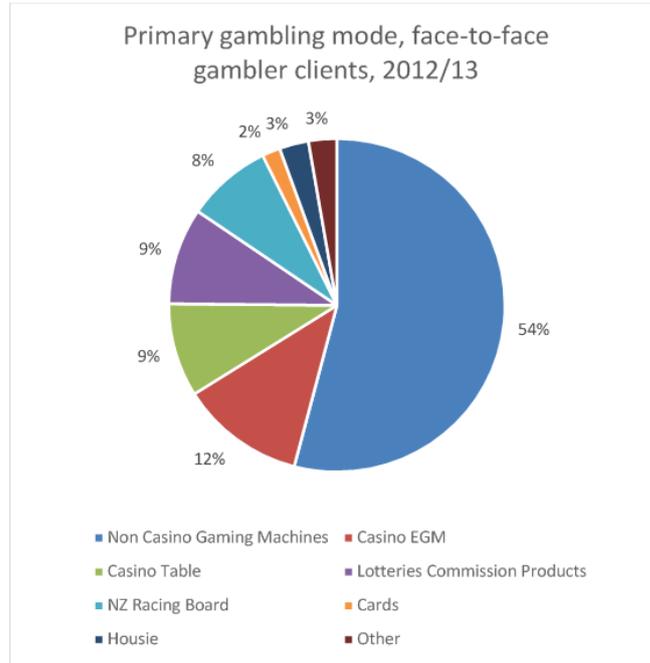


14 Devlin, M. & Walton, D. (2012). The prevalence of problem gambling in New Zealand as measured by the PGSI: adjusting prevalence estimates using meta-analysis. *International Gambling Studies*, 10.1080/14459795.2011.653384. Retrieved 31-May 2012 from <http://www.tandfonline.com/doi/abs/10.1080/14459795.2011.653384>

15 Department of Internal Affairs (DIA). (2009) Problem gambling in New Zealand – a brief summary. Retrieved 29 January 2013 from [http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/\\$file/ProblemGamblingFactsFinal.pdf](http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/$file/ProblemGamblingFactsFinal.pdf)

16 Ministry of Health. (2012). Gambling Helpline report for national statistics to 31 December 2011. Wellington: MOH. Retrieved 30 June 2014 from <http://www.health.govt.nz/system/files/documents/pages/gambling-helpline-report-july-dec-2011.pdf>

- 54% of gambler clients attending face-to-face counselling cited non-casino gambling machines as their primary mode of gambling, and a further 12% cited casino gambling machines.¹⁷



¹⁷ Ministry of Health (2013). Table 11: Problem gambling client presentation data. Provides information on client presentation numbers, both new and existing clients, by gambling industry sector, for the 2004/05 to 2012/13 Financial Years. Wellington, MOH. Retrieved from 30 June 2014 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data>

HOW GAMBLING MACHINES WORK

- Gambling machines are not a simple or harmless form of entertainment. A modern gambling machine is a subtle and sophisticated media experience, designed to keep people using the machine as long as possible.¹⁸

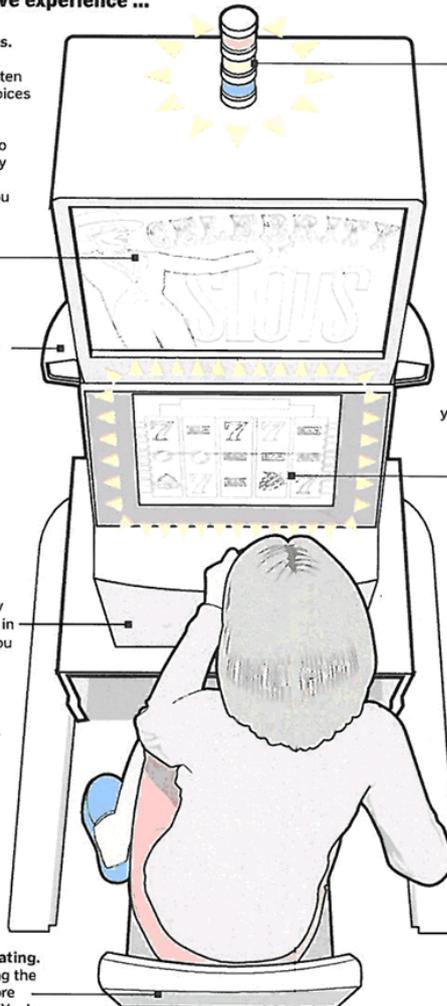
An immersive experience ...

Snazzy displays. Animated, entertaining, often including the voices and images of beloved TV and movie stars who goad you to play more and congratulate you when you win.

Directional speakers. They bathe you in sound, blocking out the noises from the room around you.

Easy payment plans. The new machines don't display dollar amounts — they deal exclusively in "credits" that you cash out later. This serves to separate you from the idea that it's actually money you're losing.

Comfortable seating. The higher paying the machine, the more comfy the chair. You're supposed to sink in and never want to get up.



Lots of positive feedback. Anytime you win — even if the amount is less than your wager — the machine's flashing screens and screaming congratulations make you think you've just won the Kentucky Derby.

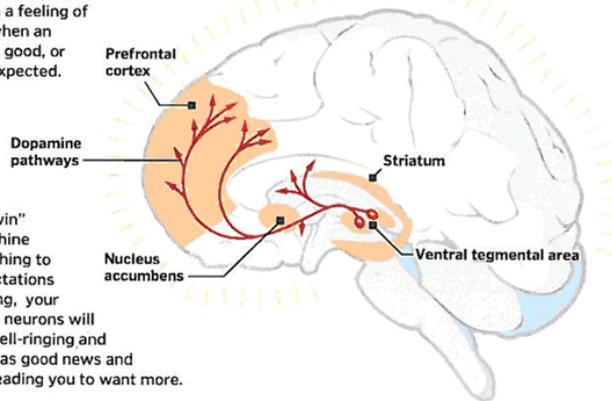
¹⁸ Mangels, J. and W. Neff (2011 May 15). How the machine works on you [infographic]. The Plain Dealer. Cleveland, OH.

... that has a profound effect

All this stimulation plays havoc with the **reward centers** of the human brain: those areas that are wired to anticipate some good result — such as the learning of a new skill — and make you feel good when it happens.

This reaction is fueled, in part, by the neurotransmitter **dopamine**. Special neurons in certain areas of your brain produce this chemical, which "rewards" the brain with a feeling of satisfaction when an outcome is as good, or better, than expected.

Although a "win" on a slot machine may have nothing to do with expectations or skill-learning, your dopaminergic neurons will take all that bell-ringing and light-flashing as good news and reward it — leading you to want more.



SOURCE: Luke Clark, University of Cambridge

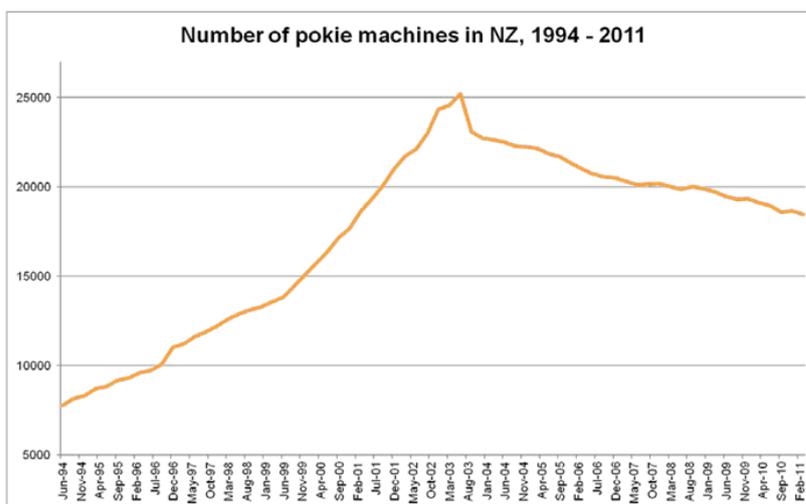
JOHN MANGELS, WILLIAM NEFF | THE PLAIN DEALER

-
- Gambling products use psychological tricks which take advantage of some of the faulty ways that we all, as human beings, think.
- You haven't won all night, so the big win is on the way: This is not true. Gambling exploits our human misunderstanding of statistical probability and our ingrained belief in luck (even though statistics always prove us wrong).
- The near-miss effect: Gambling machines exploit this, because a near-miss will trigger your brain in the same areas as if you had really won. These are also the same areas which are involved in drug addiction. This is why problem gamblers crave gambling and have compulsive thoughts about it. Machines will be programmed to show as many near-misses as they can get away with (most countries legislate how many times they can do this).
- Creating immersive environments: Gambling machines make you forget the outside world through clever design. Dark backgrounds and deep but bright jewel-like colours attract and stimulate the brain. Spot-lit areas draw your focus in. Sound and light at random times both disorients the user and stimulates the brain at the same time.
- Small wins: pokies feed users with small wins to keep them putting money in, disguising the much bigger cumulative losses.

Brain stimulation: The anticipation of gambling causes excitement, raised heart-rate, shallow breathing, and other nervous system responses. Winning and losing cause even greater responses, which are tied directly into our brain's reward centres. The design of modern gambling amplifies these even more. The reward areas of your brain take all the bell-ringing and light-flashing as good news and reward your neurons with large hits of dopamine. This happens even when you are losing, and is why gambling can operate just like a drug or alcohol addiction.

GAMBLING NUMBERS

- Before 1988 there were no legal electronic gambling machines in New Zealand. In March 2014 there were 17,182 machines.¹⁹



- A New Zealand study acknowledged that there are many forces of work at play that can reduce problem gambling prevalence, including public health work, adaptation (when no new machines are introduced) and policy. The report found strong support for the “access thesis,” which says that increases of non-casino gambling machines lead to an increase in problem gambling prevalence. **Specifically, the study found that there is an increase in problem gambling by nearly one person per each new machine.**²⁰
- The report went so far as to state in its conclusion that, “from the perspective of public policy, and particularly harm minimisation, holding or reducing EGM [electronic gambling machine] numbers would appear to be prudent based on our findings, and is likely to lead to reduced harm both through reduced availability and by enabling adaptation processes.”
- The same study supported the view that restricting the per capita density of gambling machines leads to a decrease in gambling harm.²¹
- In submissions to Councils, Jarrod True of the TAB challenged the findings of this study. Mr. True explains that “after reading the full study and reading the research

¹⁹ Department of Internal Affairs (DIA). (2014). Society, Venue and Gaming Machine Numbers: 31 March 2014. Retrieved 30 June 2014 from [http://www.dia.govt.nz/Pubforms.nsf/URL/Stats_31%20March%202014.pdf/\\$file/Stats_31%20March%202014.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/Stats_31%20March%202014.pdf/$file/Stats_31%20March%202014.pdf)

²⁰ Abbott, M., Storer, J., & Stubbs, J. (2009 December). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9 (3), 225 – 244. Retrieved 29 January 2013 from <http://www.tandfonline.com/doi/pdf/10.1080/14459790903257981>

²¹ *Ibid*, p.241.

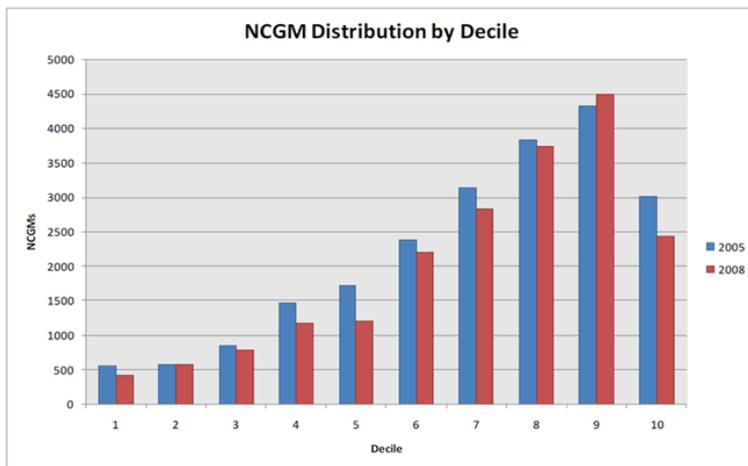
data it does not appear that any strong correlation exists [between gambling machine access and problem gambling]." This claim should be disregarded for two obvious reasons.

- Mr. True's analysis is contrary to conclusions articulated in the very abstract of the article, which states: "strong statistically meaningful relationships were found for an increase in prevalence with increasing per capita density of EGMs, consistent with the access hypothesis and supported by no evidence of plateauing of prevalence with increasing density of EGMs."
- The assertions put forth by Mr. True carry less authority than that of three well-respected and qualified researchers, who almost unarguably are more qualified to interpret their own statistics and research. Mr. True's assertions are also contrary to those accepted by the peer-review team that accepted the article for publication in the interdisciplinary journal where it appeared (a journal that was launched by a team of international experts with a commitment to the highest scholarly standards).
- The industry has, in the past, claimed that a decrease in gambling machine numbers will lead to an increase in other forms of gambling, but there is no need to be concerned that a sinking lid would have any such impact. There is no evidence that a decrease or removal of non-casino gambling machines leads to a "transfer" to other types of gambling.²²

²² Lund, I. (2009 March 26). Gambling behaviour and the prevalence of gambling problems in adult EGM gamblers when EGMs are banned: A natural experiment. *Journal of Gambling Studies*, 25:215-225.
Abbott MW. Do EGMs and problem gambling go together like a horse and carriage? *Gambling Research*. 2006;8(1):7-38.

GAMBLING MACHINE DENSITY AND LOCATION

- Studies and data from New Zealand²³ and Australia²⁴ indicate that there are significantly more venues and electronic gambling machines in low-socio economic communities.
- Across New Zealand there is a clear trend in the concentration of machines across deprivation areas: electronic gambling machines are more likely to be found in the more deprived areas of New Zealand.²⁵



- Another way of interpreting this data is to consider that in wealthy areas, the ratio of gambling machines to people is 1 to 465. In poorer areas, the ratio of gambling machines to people is 1 to 75. This means that a young person growing up in a poorer area will have 6 times more gambling machines in their community than a better-off peer.²⁶



23 Francis Group. (2009). Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health. Wellington: MOH.
 Huriwai, T., Rigby, J. E., & Wheeler, B.W. (2006) Pokies and poverty: Problem gambling risk factor geography in New Zealand. Health and Place, 12 (1): 86-96.
 24 Livingston, C., & Woolley, R. (2008). The relevance and role of gaming machine games and game features on the play of problem gamblers: Report for the Independent Gambling Authority (IGA). Adelaide, South Australia: IGA.
 Doughney, J. (2007). Ethical blindness, EGMs and public policy. Journal of Mental Health Addiction, 5, 311-319.
 25 Francis Group. (2009). Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health. Wellington: MOH.
 26 Wheeler, B., Rigby J., & Huriwai T. (2006). Pokies and poverty: problem gambling risk factor geography in NZ. Health & Place. 12(1)

- The key drivers for the comparative over-abundance of non-casino gambling machine venues in disadvantaged areas and areas with high proportions of “at risk” groups are unclear. On the demand side, there may be greater incentives to allocate machines in areas where they will be used more intensively and potential returns are highest. However, another explanation for the location may be in the distribution of venues, such as hotels and taverns. Affluent areas have a greater ability to resist the location of hotels and taverns in their communities; communities with high rates of home ownership tend to take a more long term view of planning and zoning issues.
- Whatever the explanation, the location of venues tends to concentrate the social costs in communities that are less able to bear them.²⁷

VULNERABILITY

- Certain population groups are more vulnerable to gambling problems in New Zealand. One major demographic factor is ethnicity.²⁸
 - Māori populations comprise 36.1% of intervention service clients²⁹ and 17.9% of Helpline callers³⁰, but make up only 15% of the population³¹.
 - There has been a rise in the number of Māori women seeking help for gambling problems. Māori women seeking help for their gambling problems almost exclusively (85.6% in 2008) cite non-casino gambling machines as their problematic mode of gambling.³²
 - Pacific populations comprise 19.8% of intervention service clients³³ and 6.2% of Helpline callers³⁴, but make up only 7% of the population³⁵.
 - Overall, Māori and Pacific adults are approximately four times more likely to be problem gamblers compared to the population.³⁶
- Another major demographic factor in problem gambling is location in a highly deprived socio-economic area.³⁷

27 Hancock, L. & O’Neil, M. (2010, August). Risky business: Why the commonwealth needs to take over gambling legislation (Alfred Deakin Research Institute). Retrieved 29 January 2013 from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>

Francis Group. (2009). Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health. Wellington: MOH.

Ministry of Health. (2008) Raising the odds? Gambling behaviour and neighbourhood access to gambling venues in New Zealand. Wellington: MOH. Retrieved 29 January 2013 from <http://www.health.govt.nz/system/files/documents/publications/raising-the-odds-may08.pdf>

28 Ministry of Health. (2009). Preventing and minimising gambling harm: Consultation document; six-year strategic plan; three-year service plan; problem gambling needs assessment; and problem gambling levy calculations. Wellington: Ministry of Health. Retrieved 29 January 2013 from <http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/strategic-direction-overview/strategic-plans>

29 For the most recently reported period, July 2013-June 2014. Ministry of Health (2015). Intervention Client Data. Retrieved 11 May 2015 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data#ethnicity>

30 For the most recently reported period, 2011. Ministry of Health (2012). Gambling Helpline client data. Retrieved 2 July 2014 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/gambling-helpline-client-data>

31 Statistics New Zealand (2014). 2013 Census – Major ethnic groups in New Zealand. Retrieved 2 July 2014 from <http://www.stats.govt.nz/Census/2013-census/profile-and-summary-reports/infographic-culture-identity.aspx>

32 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

33 For the most recently reported period, July 2013-June 2014. Ministry of Health (2015). Intervention Client Data. Retrieved 11 May 2015 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data#ethnicity>

34 For the most recently reported period, 2011. Ministry of Health (2012). Gambling Helpline client data. Retrieved 2 July 2014 from <http://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/gambling-helpline-client-data>

35 Statistics New Zealand (2014). 2013 Census – Major ethnic groups in New Zealand. Retrieved 2 July 2014 from <http://www.stats.govt.nz/Census/2013-census/profile-and-summary-reports/infographic-culture-identity.aspx>

36 Ministry of Health (2009). A focus on problem gambling: results of the 2006/07 New Zealand Health Survey. Wellington: Ministry of Health.

37 Ibid.

- Although there has been a reduction in the number of non-casino gambling machines since 2005, they continue to be concentrated in more deprived areas.
- Census area units with a deprivation decile rating of 8 or above accounted for 56% of all non-casino gambling machine expenditure.
- Māori and Pacific peoples are over-represented in these deciles, which may make them more vulnerable.
 - Other demographic factors of vulnerable populations include age (35-44) and lack of educational qualifications, as well as workforce status (unemployed or out of workforce).³⁸
 - Problem gambling is more common in individuals with major depression, anxiety, and personality disorders.³⁹
 - Substance abusers have a 2-10 fold increased risk for problem gambling.⁴⁰
 - There is increasing concern around the vulnerability of youth populations to gambling as well; youth and young adults have high rates of problem gambling.⁴¹

³⁸ Ibid.

³⁹ Ibid

Petry, N.M., Stinson, F.S. & Grant, B.F. (2005). Comorbidity of DSM-IV pathological gambling and psychiatric disorders: Results from the National Epidemiologic Survey on Alcohol and Related Conditions. *The Journal of Clinical Psychiatry*, 66, 564-574.

⁴⁰ Ministry of Health (2009). A focus on problem gambling: results of the 2006/07 New Zealand Health Survey. Wellington: Ministry of Health.

⁴¹ C. Messerlian, J. Derevensky & R. Gupta (2005) Youth gambling problems: a public health perspective. *Health Promotion International* 20 (1): 6-79.

HOW GAMBLING HURTS WELLINGTON

PERSONAL AND SOCIAL COSTS

“For many people and their families, however, gambling has harmful consequences, and the negative effects on the community are far-reaching. The social costs of gambling are out of proportion to the number of problem gamblers.”⁴²

- Though the number of problem gamblers in your community may seem small, the impact is serious and affects us all.
- Problem gambling imposes:
 - Personal costs (on the problem gambler).
 - Social costs (on family members, friends, co-workers, those with whom he or she has business relationships, and the general public as well).



Adapted from Australian Productivity Commission Report 1999

- The “personal costs” can include: **depression and anxiety; suicide** (either thoughts or attempts); financial indebtedness; **bankruptcy**, arrest, imprisonment, **unemployment, divorce**, and poor physical and mental health.⁴³
- The “social costs” can include: impacts on the families of people experiencing gambling harm (through **family violence**, household stress, poor parenting, and family break-up); impacts on employers (through lost production, **fraud and theft**); impacts on the government (through **costs to the police, the criminal justice system, and the social welfare system**).⁴⁴

⁴² Ministry of Health. 2010. Preventing and Minimising Gambling Harm: Six-year strategic plan 2010/11–2015/16. Wellington: Ministry of Health.

⁴³ Abbott, M. W. (2001, June). What do we know about gambling and problem gambling in New Zealand? Report number seven of the New Zealand gaming survey. Wellington: Department of Internal Affairs. Retrieved 29 January 2013 from <http://www.dia.govt.nz/Pub/forms.nsf/URL/Report7.pdf?file/Report7.pdf>

⁴⁴ Ibid.

- A 2008 study found that “those who had higher levels of participation in gambling activities (based on time spent and losses relative to income) reported experiencing significantly **worse physical health, worse mental health**, and poorer feelings about self and **lower satisfaction with life**”.⁴⁵
- Recent research confirms that the proportion of New Zealanders experiencing broader gambling harms is much higher than the prevalence for problem gambling. **One in six New Zealanders say a family member has gone without something they needed or a bill has gone unpaid because of gambling.**⁴⁶ This percentage was higher among Māori (38%) and Pacific (28%), and among those in more deprived (deciles 8-10) neighbourhoods.
- Problem Gambling Foundation staff are aware of the link between pokie use and begging on Wellington streets. Pokie machines are a driver of extreme poverty and begging. This is an area of considerable concern to Wellingtonians, and reducing the prevalence of pokie machines would go some way to addressing it.

PROBLEM GAMBLING AND CHILDREN

- When parents have problems with gambling, it is often children who suffer most. Young children can miss out on basic essentials if a parent has gambled away household money. Gambling can lead to broken homes, damaged relationships, physical and emotional harm, and a higher risk of the children becoming problem gamblers themselves. A single person’s harmful gambling can affect five to ten people, and children are vulnerable when it’s their parent or other close relative.
- A North American study found that children are often aware that their parents cannot provide them with items such as presents, school trips and even food not because of a lack of money but as a direct result of gambling behaviour.⁴⁷
- If children’s needs are not being met, they can suffer from health problems due to poor nutrition or malnutrition, and the responsibility of meeting these needs may fall on extended family, schools and social services. This can cause those children to feel that they are not cared for – or cared about – by their parents.⁴⁸
- For children of problem gamblers, feelings of neglect can be a daily struggle. The parent may spend a great deal of time gambling, move out due to arguments about their gambling, or just disappear unpredictably.

South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide. (2005, November). Problem gambling and harm: Towards a national definition. Victoria: Department of Justice. Retrieved online 29 January 2013 from <http://www.adelaide.edu.au/saces/gambling/publications/ProblemGamblingAndHarmTowardNationalDefinition.pdf>

45 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

46 Abbott, M.W., Gray, R.J., & Walker, S.E. (2012 April). Knowledge, views, and experiences of gambling and gambling-related harms in different ethnic and socio-economic groups in New Zealand. *Australian and New Zealand Journal of Public Health*, 36, 2 (153-159).

47 McComb, J., B. Lee and D. Sprenkle (2009). "Conceptualizing and treating problem gambling as a family issue." *Journal of Marital & Family Therapy* 35(4): 415-431.

48 Dyal, L., Y. L. Thomas and D. Thomas (2009). "The impact of gambling on Māori." *Ngā Pae o te Māramatanga*

- Losses can be emotional too. The parent's personality can become unrecognisable to their children, who feel gambling has become more important than family. Their relationship with their child or children can be damaged as they become more secretive, unreliable and prone to breaking promises.⁴⁹
- Children are more likely to suffer physical violence or abuse if they have parents with problem gambling, especially when combined with other problems such as alcohol abuse.⁵⁰ One study found that six out of 10 communities had increases in reported domestic violence (including spousal and partner abuse) after casinos were introduced in the area.⁵¹
- Problem gambling, especially when it is present alongside other disorders such as alcohol and drug abuse,⁵² can increase the risk of children developing unhealthy behaviours. Alcohol abuse, educational difficulties, emotional disorders and suicidal tendencies are more likely when a parent gambles.⁵³ Other associated problems include eating disorders, trouble sleeping⁵⁴, asthma, allergies, and gastrointestinal disorders.⁵⁵
- Of all the studies done on children of problem gamblers, one of the most consistent findings is that they are far more likely to become problem gamblers themselves. Children with a family history of problem gambling are between 2 and 10 times more likely to develop gambling problems later in life. If the person in their life who gambled was their father, it may be as much as 14 times more likely.⁵⁶
- A study of gambling in Māori communities outlines a model of how children are at risk if gambling is a part of their young lives. When exposed to gambling activities from an early age, in the form of housie games at home or Marae fundraising activities played by their parents or whānau, children grow up seeing gambling as a normal activity and central to social life. They may be allowed – even encouraged – to participate from a young age. Dysfunction at home, in the form of financial problems or domestic violence increases the risk that they will look to gambling for an escape. As they grow their gambling may become more intense until it has become problematic. From there, debt may spiral out of control, relationships may erode, and their children may be neglected.⁵⁷
- Children of problem gamblers face higher likelihoods of having some of the following disorders at some point in their life as compared to the general population.⁵⁸

49 Ibid.

Darbyshire, P., C. Oster and H. Carrig (2001). "The experience of pervasive loss: Children and young people living in a family where parental gambling is a problem." *Journal of Gambling Studies* 17(1).

50 Lesieur, H. and J. Rothschild (1989). "Children of Gamblers Anonymous members." *Journal of Gambling Behavior* 5(4): 269-281.

51 Shaw, M., K. Forbush, J. Schlinder, E. Rosenman and D. Black (2007). "The effect of pathological gambling on families, marriages and children." *CNS Spectrums* 12(8).

52 Rossen, F., R. Butler and S. Denny (2011). "An exploration of youth participation in gambling & the impact of problem gambling on young people in New Zealand." Ministry of Health.

53 Shaw, M., K. Forbush, J. Schlinder, E. Rosenman and D. Black (2007). "The effect of pathological gambling on families, marriages and children." *CNS Spectrums* 12(8).

54 Lesieur, H. and J. Rothschild (1989). "Children of Gamblers Anonymous members." *Journal of Gambling Behavior* 5(4): 269-281.

55 Horvath, V. and R. Pierce (2002). Pathological gambling and child neglect: A cause for concern. The Downside: Problem and Pathological Gambling. J. J. Marotta, J. A. Cornelius and W. R. Eadington. Carson City, Institute for the Study of Gambling and Commercial Gaming.

56 Dowling, N., A. Jackson, S. Thomas and E. Frydenberg (2010). "Children at risk of developing problem gambling." The Problem Gambling Research and Treatment Centre.

57 Dyall, L., Y. L. Thomas and D. Thomas (2009). "The impact of gambling on Māori." *Ngā Pae o te Māramatanga*.

58 Data based on a study of problem gamblers' family members vs a control group. Shaw, M., K. Forbush, J. Schlinder, E. Rosenman and D. Black (2007). "The effect of pathological gambling on families, marriages and children." *CNS Spectrums* 12(8).

- Alcohol disorders (31% vs 4%)
- Major depression (19% vs 7%)
- Drug use disorders (5% vs 2%)
- Antisocial personality disorder (5% vs 0%)
- Generalised anxiety disorder (8% vs 0%)
- Any psychiatric disorder (50% vs 11%)

CRIME

Problem gamblers are at high risk of committing crimes in order to finance their gambling activities.

- Gambling-related crime has received considerable public attention in recent years, including recent media attention.
- Offending by gamblers has been investigated in a number of New Zealand and international studies. Despite difficulties in determining the extent of gambling-related crime and the causal pathways, it appears that problem gamblers are at high risk of committing crimes in order to finance their gambling activities.⁵⁹
- In 2008 a New Zealand study found that 25% of those engaged in criminal activity would not have done so if it had not been for their gambling. This suggests that just below a third of the relevant population—10,000 people—committed illegal activities because of gambling.⁶⁰
- Problem gambling has been linked to criminal activity and studies have suggested that much of the crime goes unreported.⁶¹ Apart from the financial cost of gambling-related crime to organisations and individuals directly involved, there are often financial and other costs for people experiencing problem gambling who are convicted, as well as for their families.⁶²
- A 2009 New Zealand study found that “gamblers and significant others believe that a relationship exists between gambling and crime” and that “there is substantial unreported crime, a large proportion of which is likely to be related to gambling and that there are a large range of crimes committed in relation to gambling (particularly continuous forms of gambling), and not just financial crimes”.⁶³ They suggest that 10% of people experiencing problem gambling and 2/3 of those receiving counselling for gambling-related issues have committed a crime because of their gambling.

59 Wheeler, S., Round, D. and Wilson, J. (2010). 'The Relationship between crime and gaming expenditure in Victoria', Melbourne: Department of Justice, Victoria.

Abbott, M., Bellringer, M., Brown, R., Coombes, Dyall, L., R., McKenna, B., & Rossen, F. (2009). Problem gambling: Formative investigation of the links between gambling (including problem gambling and crime in New Zealand). Auckland: Auckland University of Technology, report prepared for the Ministry of Health. Retrieved 29 January 2013 from http://www.aut.ac.nz/resources/research/research_institutes/niphmhr/report_final_gambling_and_crime.pdf

62 South Australian Centre for Economic Studies (SACES) (2009), Social Impacts of Gambling: A Comparative Study. Report commissioned by the South Australian Independent Gaming Authority, April. Adelaide: South Australian Independent Gaming Authority. Retrieved 29 January 2013 from <http://www.iga.sa.gov.au/pdf/research/SocialImpactsOfGamblingAComparativeStudyApril2009-PublishedVersion.pdf>

60 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

61 May-Chahal, C. et al. (2007), Scoping Study for a UK Gambling Act: 2005 Impact Assessment Framework, London: Department for Culture, Media, and Sport. Retrieved 29 January 2013 from http://www.culture.gov.uk/images/research/scopingstudy_ga05iaf.pdf

60 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

61 Abbott, M., Bellringer, M., Brown, R., Coombes, Dyall, L., R., McKenna, B., & Rossen, F. (2009). Problem gambling: Formative investigation of the links between gambling (including problem gambling and crime in New Zealand). Auckland: Auckland University of Technology, report prepared for the Ministry of Health. Retrieved 29 January 2013 from http://www.aut.ac.nz/resources/research/research_institutes/niphmhr/report_final_gambling_and_crime.pdf

62 Australian Productivity Commission. (2010). Gambling: Inquiry Report. Canberra: Commonwealth of Australia. 16, 231, 280.

Department of Internal Affairs (DIA). (2009) Problem gambling in New Zealand – a brief summary. Retrieved 29 January 2013 from [http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/\\$file/ProblemGamblingFactsFinal.pdf](http://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/$file/ProblemGamblingFactsFinal.pdf)

63 Abbott, M., Bellringer, M., Brown, R., Coombes, Dyall, L., R., McKenna, B., & Rossen, F. (2009). Problem gambling: Formative investigation of the links between gambling (including problem gambling and crime in New Zealand). Auckland: Auckland University of Technology, report prepared for Ministry of Health. Retrieved 29 January 2013 from http://www.aut.ac.nz/resources/research/research_institutes/niphmhr/report_final_gambling_and_crime.pdf

ECONOMIC DEGRADATION

- New Zealand and international research has shown that losses that offer a sharp contrast to the often celebrated economic gains the gambling industry produces. Money for gambling is diverted from savings and/or other expenditure, and can have a negative impact on local businesses and the economic health and welfare of whole communities.⁶⁴
- A recent report noted that jobs and economic activities generated by gambling expenditure would exist elsewhere if that money was spent outside the gambling industry.⁶⁵
- Employment, normally considered a standard business cost, is framed within the gambling industry as a special benefit to the community. Even if gambling does create employment opportunities, a comparison of gambling and retail in terms of jobs created for every million dollars spent shows that gambling creates about half as many jobs as retail.⁶⁶
- The Christchurch City Council May 2009 study *Economic Impacts of NCGMs on Christchurch City* suggests that over the course of a year, gambling machines in Christchurch result in lost economic output of \$13 million, additional GDP of \$2 million, lost employment for 630 full-time equivalents, and lost household income of \$8 million.⁶⁷

64 Harrison, B. (2007). Casinos and regeneration: the story so far, briefing paper no. 1. London: IPPR (Institute for Public Policy Research, UK). Retrieved 29 January 2013 from <http://www.eukn.org/dsresource?objectid=146582>

65 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

66 Per million dollars spent, gambling generates approximately 3.2 jobs while retail produces approximately 6.3.

South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide. (2005, November). Problem gambling and harm: Towards a national definition. Victoria: Department of Justice. Retrieved online 29 January 2013 from [http://www.gamblingresearch.org.au/CA256902000FE154/lookup/GRA_Reports_Files1/\\$file/FinalReportPrinter.pdf](http://www.gamblingresearch.org.au/CA256902000FE154/lookup/GRA_Reports_Files1/$file/FinalReportPrinter.pdf)

67 Colegrave, F. & Simpson, M. (2009 May). The economic impacts of NCGMs on Christchurch City: Prepared for Christchurch City Council. Auckland: Covec, Ltd.

REDUCING GAMBLING HARM IN WELLINGTON

Increased availability of opportunities to gamble is associated with more gambling and more problem gambling.

- There is strong evidence that problem gambling harms can be reversed.⁶⁸ This means that at the least, there is the potential to reduce the prevalence of problem gambling, and at most, the prevalence of many other problems as well.
- A key question has been whether gambling machine supply contributes to problem gambling. Research has shown that indeed restricting accessibility of gambling venues and machines would help curb problem gambling.
- A recent New Zealand Ministry of Health survey found some significant associations between gambling accessibility and gambling behaviour. Gambling behaviour, they state, is strongly associated with the distance to the nearest gambling venue.⁶⁹ The more gambling venues there are within 5kms of a person's neighbourhood the more likely that the person would have gambled at the gambling venue in the last year.
- A range of other studies have also indicated a link between the availability of some types of legal gambling and problem gambling. The evidence for the availability hypothesis has been considered by official review bodies in New Zealand⁷⁰, Australia⁷¹, the United States⁷², and Canada⁷³. Each concluded that increased availability of opportunities to gamble was associated with more gambling and more problem gambling.
- A recently produced report, cited in a previous section, conducted a meta-analysis from numerous key Australian and New Zealand studies and found a strong statistically meaningful relationship between the increases in gambling prevalence with increased per capita gambling machine density. It also found that contrary to

68 Winters, K. C., Stinchfield, R. D., Botzet, A., & Slutske, W. S. (2005). Pathways of youth gambling problem severity. *Psychology of Addictive Behaviors*, 19(1), 104-107.

Abbott, M., Bellringer, M., Reith, G., & Volberg, R. (2004). A review of research on aspects of problem gambling: Final report. Auckland: Auckland University of Technology, report prepared for Responsibility in Gambling Trust, UK.

69 Ministry of Health. (2008) Raising the odds? Gambling behaviour and neighbourhood access to gambling venues in New Zealand. Wellington: MOH. Retrieved 29 January 2013 from <http://www.health.govt.nz/system/files/documents/publications/raising-the-odds-may08.pdf>

70 Ibid.

Day, P., Hiscock, R., Mason, K., & Pearce, J. (2008). A national study of neighbourhood access to gambling opportunities and individual gambling behaviour [Abstract]. *Journal of Epidemiology and Community Health*, 26, 849, 862-868.

Abbott, M., Clarke, D., Townsend, S., & Tse, S. (2006, July). Key indicators of the transition from social to problem gambling. *Journal of Mental Health and Addiction* 3, 29-40.

71 Hancock, L. & O'Neil, M. (2010, August). Risky business: Why the commonwealth needs to take over gambling legislation (Alfred Deakin Research Institute). Retrieved 29 January 2013 from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>

Bates, G., Jessop, G., Kyrios, M., Meredyth, D., Moore, S., & Thomas, A. C. (2009, November) Gambling and the multidimensionality of accessibility: More than just proximity to venues [Abstract]. *International Journal of Mental Health and Addiction*. Retrieved 29 January 2013 from <http://www.springerlink.com/content/9712354144832410/>

Doughney, J. 2006. The poker machine state in Australia: A consideration of ethical and policy issues. *International Journal of Mental Health and Addiction*, 4, 351-368.

72 Barnes, G. M., Hoffman, J. H., Tidwell, M. C. O., Wieczorek, W. F., & Welte, J. W. (2007). Type of gambling and availability as risk factors for problem gambling: A Tobit regression analysis by age and gender. *International Gaming Studies*, 7(2), 183-198.

73 Ontario Problem Gambling Research Centre. (2010). Problem Gambling Framework. Retrieved 29 January 2013 from Ontario Problem Gambling Research Centre Web site: <http://www.gamblingresearch.org/content/default.php?id=2007>

Robitaille, E., & Herjean, P. (2008). An analysis of the accessibility of video lottery terminals: the case of Montréal. *International Journal of Health Geographics*, 7(2).

Cantinotti, M., Jacques, C., Ladouceur, R., & Sevigny, S. (2008). Links between casino proximity and gambling participation, expenditure, and pathology. *Psychology of Addictive Behaviors*, 22(2), 295-301.

previous studies, there was no evidence for plateau of gambling prevalence with increased density of machines.⁷⁴

- A later study in the UK acknowledged that decreases in gambling-related problems are a complex process involving not only social adaptation, but also the implementation of public health policies and the provision of specialist services. The adaptation process also seems to be inconsistent across communities; different groups of people are affected differently by the process.⁷⁵
- Most reliable research would indicate that there is no single cause which triggers problem gambling. The phenomenon is a result of the combination of several factors, some of which have been outlined in the diagram below.⁷⁶ Several of these factors can be influenced by the Council.
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74 Abbott, M., Storer, J., & Stubbs, J. (2009). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9, 225-244.

75 Griffiths, M.D (2007). *Gambling addiction and its treatment within the NHS*. London: British Medical Association. Retrieved 29 January 2013 from http://www.bma.org.uk/images/gambling_tcm41-146741.pdf

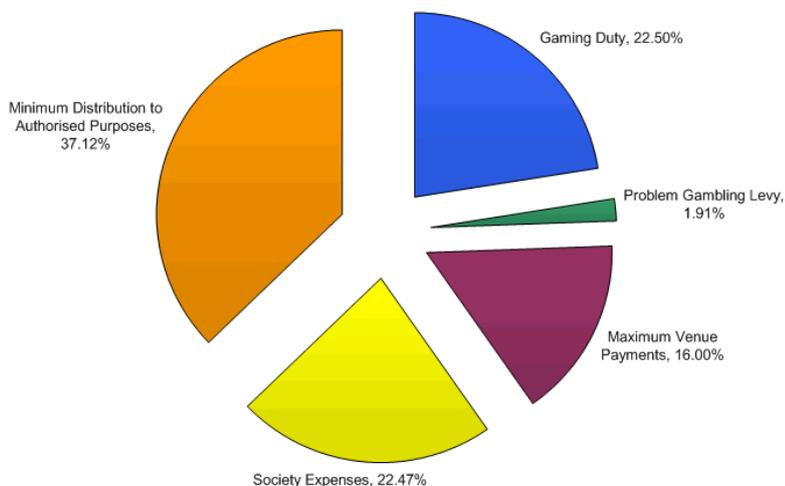
76 Productivity Commission. (1999). *Australia's Gambling Industries*, Report No. 10, AusInfo, Canberra, Vol 1, p. 323. Retrieved 29 January 2013 from http://www.pc.gov.au/_data/assets/pdf_file/0004/82552/gambling1.pdf

ETHICS OF GAMBLING FUNDING

HOW GAMBLING MACHINE TRUSTS WORK

- Gambling trusts were established under the Gambling Act 2003 in an attempt to off-set some of the harm caused by gambling by returning some of the gambling expenditure to the people in the form of community grants. **Although the purpose of the trusts is to distribute money to the community, the purpose of gambling is not to raise money for the community, and it should not be perceived as such.**
- Gambling machines are licensed to operate in pubs and clubs only as a form of community fundraising.⁷⁷ Licence holders must distribute their net proceeds to the community by way of grants.
- They are required to distribute a minimum of 37.12% of their GST exclusive gross proceeds for each of its financial years (Gambling (Class 4 Net Proceeds) Regulations 2004. Part 2 Section 9 (1) and 10).⁷⁸
- Legislation dictates that each dollar of gross proceeds (i.e., turnover [aggregate stakes] minus user wins) must be distributed in accordance with the pie chart shown in the figure below.⁷⁹ These include the fixed amounts towards gambling duty and the problem gambling levy.

Allocation of Gross Proceeds (excluding GST)



⁷⁷ Clubs are permitted to be societies and to operate their own machines in their own clubrooms. They are not required to make grants to other community organisations but can do so.

⁷⁸ Government also receives tax revenue from gambling taxes and levies which it redistributes for public purposes. NCGM gambling machines are the largest source of tax revenue: 20 percent tax rate, 1.1 percent problem gambling levy and GST (Inland Revenue 2006).

⁷⁹ Ministry of Health. 2009. Problem Gambling Resource for Local Government. Wellington: Ministry of Health. Retrieved 29 January 2013 from <http://www.health.govt.nz/system/files/documents/publications/problem-gambling-resource-local-government.doc>

- In 2005 (the last time DIA completed an analysis of grants), gambling machine societies allocated \$317 million to authorised purposes. 47% of that went to sports and physical activities, the single largest category of recipient in 2005. **In 2005 almost 8% (over \$20 million) went to horse racing, mostly for stake money for races.**⁸⁰
- While the grants made by community funding bodies like the New Zealand Lottery Grants Board are well documented, no comparable aggregate statistics are readily available for the allocation to authorised purposes of the profits of non-casino gambling machines.⁸¹
- The Problem Gambling Foundation believes that we need a more open, lower cost, and transparent system to end the rorts, the lack of compliance, and the illegal activity associated with the current gambling machine trusts system.⁸² We also want greater transparency around who does and doesn't get grants and why.
- The current gambling machine trust system (around 50 gambling machine trusts) is inefficient. Society expenses are approximately 22%⁸³ (over \$150 million) with much duplication of roles and resources.

REGRESSIVE NATURE

- Gambling generates significant funding for community purposes. However, gambling funding raises revenue at a very high cost. International and New Zealand studies have identified that gambling is sharply regressive. Income is effectively being redistributed away from low income communities.⁸⁴
- One attraction of using gambling to collect public funding is that it appears to be "painless" or "voluntary". The "painless voluntary donation" view has been criticised on grounds that it is highly regressive and exploits the false hopes or financial risk-taking of those on lower incomes. It is also argued that many of the gamblers contributing are, at the time of making their contribution, affected by drugs, alcohol, and possibly mental illness. **In other words, for a problem gambler, the contribution is not a voluntary one.**⁸⁵
- **A significant amount of the money generated from gambling comes at the expense of people with gambling problems.** A 2000 study in New Zealand estimated that problem gamblers account for about 20% of gambling

⁸⁰ Department of Internal Affairs. (2007). Where do gaming profits go? A survey of the allocation for authorized purposes of non-casino gaming machine profits in 2005. Page 33. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/\\$file/GamingMachineProfits_2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/$file/GamingMachineProfits_2005.pdf)

⁸¹ Ibid.

⁸² There have been a steady stream of media stories in recent years highlighting rorts and illegal activity surrounding pokie trusts and the pokie grant system. PGF has these documented in its online library and they can be made available on request.

⁸³ Department of Internal Affairs. (2007). Where do gaming profits go? A survey of the allocation for authorized purposes of non-casino gaming machine profits in 2005. Page 33. Wellington: DIA. Retrieved 29 January 2013 from

[http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/\\$file/GamingMachineProfits_2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamingMachineProfits_2005.pdf/$file/GamingMachineProfits_2005.pdf)

⁸⁴ Hancock, L. & O'Neil, M. (2010, August). Risky business: Why the commonwealth needs to take over gambling legislation (Alfred Deakin Research Institute working paper 11). Retrieved 29 January 2013 from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>

Uniting Care Australia (2009). Submission to the Productivity Commission Inquiry into Australia's Gambling Industries. Page 50. Retrieved 29 January 2013 from http://www.unitingcare.org.au/images/stories/submissions/sub_productivity_com_gambling_may09.pdf

⁸⁵ Bostock, W. (2005) Australia's gambling policy: motivations, implications and options. Journal of Gambling Issues, 13. Retrieved 29 January 2013 from <http://jgi.camh.net/doi/full/10.4309/jgi.2005.13.4>

expenditure.⁸⁶ A 2010 report in Australia said figures could be as high as 40-60% for gambling machine gambling.⁸⁷

- Studies involving cost benefit analysis have argued that the benefits from gambling for the majority of people gambling are individually very small relative to the costs borne by the minority of people experiencing gambling harm.⁸⁸
- Lower-income households spend proportionately more of their money on gambling than higher-income households.⁸⁹ People who are already socially and economically disadvantaged are most susceptible to gambling problems.⁹⁰ This can concentrate the negative impact of gambling in areas which are already deprived, and thereby increase inequalities in our communities.
- Furthermore, the revenue generated by gambling within a community is often spent in a more affluent community.⁹¹ A 2004 study examining distribution of community benefit funding from six major EGM trusts found that more affluent areas (such as Central Auckland and the North Shore) were receiving considerably more funding per capita than the lower income areas (such as Manukau City).⁹²

IMPACT OF PROPOSED POLICY ON COMMUNITY FUNDING

- There are concerns that a reduction in gambling machines will cause a reduction in gambling machine income to societies which will have the flow on effect of cutting the level of grants made to local community groups.
- While gambling machine revenue is declining, recent years have still seen record gambling machine grants to the community.⁹³
- Gambling machine trusts often insinuate that many community groups would not survive without gambling machine money. While it's true that some groups would suffer, gambling machine trusts account for only 10.2% of charitable giving in New

86 Abbott, M. W. and Volberg, R. A. (2000). Taking the Pulse on Gambling and Problem Gambling in New Zealand: A Report on Phase One of the 1999 National Prevalence Study. Wellington: DIA. Retrieved 29 January 2013 from http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Our-Research-and-Reports-New-Zealand-Gaming-Survey?OpenDocument#ph1

87 Australian Productivity Commission. (2010). Gambling: Inquiry Report. Canberra: Commonwealth of Australia. 16. Retrieved 29 January 2013 from http://www.pc.gov.au/_data/assets/pdf_file/0010/95680/gambling-report-volume1.pdf

88 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

89 McMullan, J.L. (2005). The Gambling Problem and Problem Gambling. Conference conducted at the 4th Annual Alberta Conference on Gambling Research, Public Policy Implication of Gambling Research, University of Alberta, Canada. Retrieved 29 January 2013 from <https://dspace.ucalgary.ca/bitstream/1880/47421/13/mcmullan.pdf>

90 Abbott, M., Landon, J., Page, A., Palmer, K., Thorne, H. (2010). Focused literature review for the problem gambling programme: Final report for the Health Sponsorship Council. Auckland University of Technology, Auckland. Retrieved 29 January 2013 from <http://www.hsc.org.nz/sites/default/files/publications/HSC-PG-ReviewFinal-Sept2010.pdf>

Doughney, J., & Kelleher, T. (2008/09). Victorian and Maribymong gambling: a case of diverted consumer spending. An Unconscionable Business: The Business: The Ugly Reality of Electronic Gambling: a Selection of Critical Essays on Gambling Research, Ethics and Economics. Cited in Borrell, J. (2009). Submission to the productivity commission gambling inquiry. Kildonan Uniting Care: Whittlesea, Melbourne. Retrieved 29 January 2013 from http://www.pc.gov.au/_data/assets/pdf_file/0006/87630/sub163.pdf

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

92 Adams, P., Brown, P., Brown, R., Garland, J., Perese, L., Rossen, F., & Townsend, S. (2004) Gambling Impact Assessment for Seven Auckland Territorial Authorities. Part One: Introduction and Overview. Centre for Gambling Studies, University of Auckland. Retrieved 29 January 2013 from http://www.fmhs.auckland.ac.nz/soph/centres/cgs/_docs/2004adams2_overview.pdf

93 Department of Internal Affairs. (2010). Gambling Expenditure Statistics 1986-2010. Retrieved 29 January 2013 from <http://www.dia.govt.nz/pubforms.nsf/URL/Expendstats1986-2010.pdf?file/Expendstats1986-2010.pdf>

Department of Internal Affairs. (2007). Where do gaming profits go? A survey of the allocation for authorized purposes of non-casino gaming machine profits in 2005. Page 33. Wellington: DIA. Retrieved 29 January 2013 from http://www.dia.govt.nz/pubforms.nsf/URL/GamingMachineProfits_2005.pdf?file/GamingMachineProfits_2005.pdf

Zealand; as a comparison, personal giving accounts for 58% of charitable giving in New Zealand.

- Existing gambling machine venues are not affected by a “sinking lid” policy. A “sinking lid” only prevents new venues from being granted a licence, so the decline in venues and machines happens gradually. Therefore, a “sinking lid” policy should not have an immediate or significant impact on community funding and allows for gradual transition.
- Some groups have even argued that gambling machine handouts actually weaken community groups and that traditional fundraisers are much better at building community spirit and keeping sports and other groups strong.⁹⁴
- When it comes to raising money through gambling, a 2007 survey indicated 51% of people felt that it did more harm than good. Only 26% felt that it did more good than harm.⁹⁵
- Very few people (12%) support the current gambling machine trust system of distributing gambling machine funding. People were most supportive of a system similar to the Lottery Grants Board.⁹⁶

94 Gamblefree Day prompts call for funding boycott. (2011 September 1). ONE News. Retrieved 29 January 2013 from <http://tvnz.co.nz/national-news/gamblefree-day-prompts-call-funding-boycott-4378621>

Inglis, S. (2011 August 20). Editorial: Gambling much bigger problem. Bay of Plenty Times. Copy available upon request.

de Graaf, P. (2010 July 18). Pub: Ditching pokies worth the gamble. Northern Advocate. Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/local/news/pub-ditching-pokies-worth-the-gamble/3917450/>

Thomas, A. (2009 February 16). Rugby – ‘crisis meeting’ resuscitates Mangakahia. Northern Advocate Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/sport/news/rugby-crisis-meeting-resuscitates-mangakahia/3795053/>

McNeilly, H. (2008 July 31). Giving up pokie funding right call: Mission. Otago Daily Times. Retrieved 29 January 2013 from <http://www.odt.co.nz/news/dunedin/15633/giving-pokie-funding-right-call-mission>

95 National Research Council. (2007). 2006/07 Gaming and betting activities survey: New Zealanders’ knowledge, views and experiences of gambling and gambling related harm. Commissioned by the Health Sponsorship Council. National Research Council: Auckland.

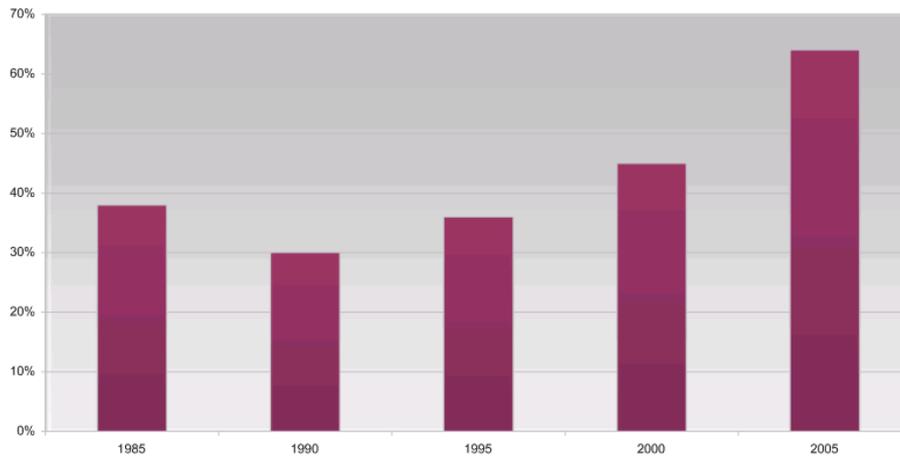
96 Ibid.

PUBLIC ATTITUDES

The majority of people consider gambling machines socially undesirable.

- The Department of Internal Affairs' national surveys of gambling conducted in 1985, 1990, 1995, 2000 and 2005 provide some indication of public attitudes over time.⁹⁷
- Over the period surveyed, New Zealanders had become increasingly concerned about the negative social impacts of gambling. There had been a steady increase in public awareness about problem gambling and the adverse impacts on individuals and the community.
- Those widely available forms most strongly linked to problem gambling in New Zealand (gambling machines, track betting and casino gambling) are also the forms of gambling that increasing proportions of adults regard as undesirable.
- In particular, the surveys found that the majority of respondents (64%) considered class 4 gambling machines to be socially undesirable.⁹⁸

**DIA Survey: Respondents' views on socially undesirable activities:
Non-casino gambling machines**



- Only 1% of adults said that there were any additional forms of gambling that they would like to see in New Zealand. Nearly half of respondents (46%) felt that the number of gambling venues in their area was about right, a further 41% thought there were too many places, and only 1% thought there were not enough places to gamble in the area they lived in.

97 Department of Internal Affairs (2008) Peoples participation in, and attitudes to, gambling, 1985-2005. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/\\$file/GamblingParticipationSurvey1985-2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/$file/GamblingParticipationSurvey1985-2005.pdf)
98 Department of Internal Affairs (2008) Peoples participation in, and attitudes to, gambling, 1985-2005. Wellington: DIA. Retrieved 29 January 2013 from [http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/\\$file/GamblingParticipationSurvey1985-2005.pdf](http://www.dia.govt.nz/Pubforms.nsf/URL/GamblingParticipationSurvey1985-2005.pdf/$file/GamblingParticipationSurvey1985-2005.pdf)

- Most of the 41% of respondents who thought that there were too many places to gamble in their area said that there were too many gambling machine venues (87%), followed by TABs (20%), Lotto/Keno/Instant Kiwi outlets and casinos (both 14%).
 - Over three-quarters of adults said that there should be special laws controlling gambling.
 - Over half said preventing criminal activity was a relevant consideration.
 - Over a third mentioned restricting opportunities to gamble.
 - 72% of people believed the role of Government in addressing gambling harm should be extensive.
- Community perception studies undertaken by other territorial authorities also indicate that communities generally hold negative views on gambling, with specific concerns that communities are being seriously damaged by the growth of the gambling industry.⁹⁹
- A Napier survey of residents (October 2009) showed that 82% think there are too many gambling machines.¹⁰⁰ A public survey in Nelson demonstrated overwhelming support for Councils having stronger powers to control the location and number of gambling machines.
- Similarly, a 2010 referendum of 14,386 people in Wanganui resulted in 11,491 people (80%) supporting a reduction of gambling machines.
- Seventeen councils now have adopted a “sinking lid” policy; twenty-three have adopted a sinking lid or a district-wide cap that is below their existing number of venues and machines.¹⁰¹
- These councils include Auckland and Christchurch. Both cities studied a large range of options and concluded that a sinking lid was the best way to build strong and diverse cities.

99 E.g. Nelson, Wanganui, Hastings, amongst others.

Support for tougher control on pokies. (2011 January 18). The Nelson Mail. Retrieved 29 January 2013 from <http://www.stuff.co.nz/nelson-mail/news/4552424/Support-for-tougher-controls-on-pokies>

Final results of referendum 10. (2010 October 9). Wanganui District Council Website. Retrieved 29 January 2013 from

<http://www.wanganuireferendum.govt.nz/Results.asp>

McCracken, H. (2010 September 15). \$100,000 a day lost on pokies. Hawke's Bay Today. Retrieved 29 January 2013 from

<http://www.hawkesbaytoday.co.nz/local/news/100000-a-day-lost-on-pokies/3922735/>

100 Napier City Council. (2009). Social Impact Assessment: Class 4 and TAB venues in Napier. Copy available upon request.

101 The strongest sinking lid policies have been adopted by councils such as Auckland, Christchurch City and Kawerau; these policies ban new venues, new machines, and transfers of existing venues or machines. Weak sinking lids (sinking lids that don't explicitly forbid transfers of pokie machines) exist in Far North, Gisborne, Gore, Hamilton, Gisborne, Hastings, Horowhenua, Invercargill, Kaipara, Otorohanga, South Waikato, Thames-Coromandel, Waiora, Wanganui, and Whangarei.

It is also worth noting that in effect, Central Hawke's Bay, Hauraki, Lower Hutt, Rotorua, Tararua, and Whakatane are currently practicing sinking lid policies; the caps they have set are lower than the current number of pokies in their council areas.

CONCLUSION

SUGGESTED POLICY

As stated at the beginning of this report, the Problem Gambling Foundation recommends that Wellington City Council adopt a “sinking lid” policy, a district ban on any new class 4 venues and machines or transfers.

NATIONAL OUTCOMES

- The Ministry of Health Six-Year Strategic Plan (2010-2016)¹⁰² has not changed significantly since the first strategic plan for problem gambling (2004-2010). A sinking lid policy would be consistent with the first four of the ten Ministry objectives to minimise the harms of problem gambling:
 - To reduce health inequalities related to problem gambling
 - That people participate in decision-making about local activities that prevent and minimise gambling harm in their communities
 - That healthy policy at the national, regional, and local level prevents and minimises gambling harm
 - That government, the gambling industry, communities, family/ whānau and individuals understand and acknowledge the range of harms from gambling that affect individuals, families/whānau and communities.

COMMUNITY OUTCOMES

- Wellington aspires to be among the best small cities in the world, offering an unbeatable quality of life.

This requires a high quality of life for *everyone* – and this can’t happen while a large number of Wellingtonians are experiencing the severe impacts that pokies cause.

Reducing the number of pokies through a sinking lid would contribute to the following outcomes:

- A fair, safe and healthy Wellington
- A democratic and responsive Wellington
- A vibrant urban environment that all Wellingtonians are proud of
- A culturally rich and creative Wellington
- A Wellington of prosperity and opportunity

102 Ministry of Health. (2009) Preventing and minimising gambling harm 2010-2016 (Revised Final Draft): Consultation document; Six-year strategic plan; three-year service plan; problem gambling needs assessment; and problem gambling levy calculations. Wellington: MOH. Retrieved 29 January 2013 from <http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/strategic-direction-overview/strategic-plans>

CLOSING THOUGHTS

- Gambling machines are not a harmless bit of fun for everyone. Gambling machines are addictive and dangerous machines, with harms that have dire consequences in Wellington. The monetary benefits from these machines are small relative to the high social and health costs which affect communities, families/whanau and individuals. They do not improve the fabric of the city, and are rejected by a large majority of Wellingtonians.
- Access to gambling is necessary for the development of problem gambling, reducing access is key to a public health approach. From a health and social perspective, there are already too many gambling machines in Wellington. Allowing new venues – in either the central city or the suburbs – will continue this situation, as will allowing them in new non-licensed premises.
- The Problem Gambling Foundation urges that the Wellington City Council adopts a “sinking lid” policy as an important beginning step for the gradual reduction of gambling machine harm in Wellington.

APPENDIX – REBUTTALS TO INDUSTRY CLAIMS

- With estimates that 1-2% of adults in New Zealand are problem gamblers, the industry often asks why Council should worry about such a small number of people. The fact is small numbers don't mean small problems. Only .003% of the population were killed or injured in traffic accidents in 2009, but Central and Local Government take the issue seriously because that minority affects us all: drink drivers, death and injury, costs on the health and justice system, not to mention emotional distress. The same is true of problem gambling—the social and economic impacts of problem gambling affect us all and need to be taken seriously.
- The industry claims that internet gambling is a serious problem, and that pokies are well regulated. However, neither the Problem Gambling Foundation, nor the Salvation Army, nor the Gambling Helpline have seen large numbers of internet gamblers. As shown in graphs above, these constitute just 1% of all cases of people seeking help, compared to pokies – which make up the large majority of all who seek help.
- The industry frequently claims that the “best evidence” of a relationship between gambling accessibility and gambling harm is to look at the correlation between machine numbers and problem gambling prevalence rates because “these factors are known.” At best, this argument has oversimplified the issue, and at worst, it has misrepresented it.
- They present a strange graph, with inconsistently spread dates on the X-axis, and no citation indicating where their prevalence rates for problem gambling come from making one of the “known factors” devoid of clarity and possibly applicability.
- Failing to cite or define “prevalence” makes this graph meaningless. The industry does say whether the figure is based on estimates of actual problem gambling prevalence, or on the prevalence of people seeking help. Plus, we know the impact of strong public health work and social marketing (i.e. television campaigns) can influence the numbers of people seeking help.
- The industry has also told other Councils that they ought to consider other problems, such as obesity, cocaine, or methamphetamine addiction, and focus on those instead. However, this policy review is about gambling and not these other issues, so it is meant to be the focus. A strong gambling policy won't prevent other community issues from being addressed.
- The industry breaks down the distribution of their funds in a way that conceals how much people lose. The image below implies that people only lose 8 cents for every dollar put into a machine.



➤ Gambling machines involve large amounts of repetition, and when this is clearly understood then the losses suggested in this diagram are magnified. Take an example where a user is on a machine with a 5-second spin rate (which is not even the minimum). If the user is betting 9 lines on a 5-cent machine with the maximum of 5 credits per line, the \$2.25 they wager every bet adds up to \$1,620 per hour.¹⁰³ If we actually apply what this diagram says, the numbers are less innocent than they initially appear.

➤ The industry has made recommendations based on what's best—for "community funds." However the gambling policy in Wellington is not about what's best for these funds—it's about what's best for people.

➤ **Figure B**¹⁰⁴

- Council will then ensure that the maximum available level of community funds is secured for the future.



➤ In the "FAQ" section of their website, when Pub Charity is asked where their funding comes from, they state, "Pub Charity licensed gaming machines."¹⁰⁵ Where the money actually comes from is people, and a significant amount of that money (an estimated 40-60%) comes from people with gambling problems.

➤ No one wants to deny that organisations accepting gambling machine funding are doing valuable work, but it is Council's responsibility to seriously reflect on where that money is coming from. **A sinking lid policy takes a courageous stance against**

¹⁰³ GamblingWatch. (2004). Pokies: Know the Facts Before You Spin.

¹⁰⁴ The Lion Foundation. (2011). Submission to the Invercargill City Council.

¹⁰⁵ Pub Charity. (2011). Frequently asked questions: Where do the donation funds come from? Retrieved 19-January 2012 from <http://www.pubcharity.org.nz/index.php/faqs>

the harms caused by gambling machines with only a gradual impact on the availability of gambling machine funding.

- Studies cited earlier that used cost benefit analysis have argued that the benefits from gambling are individually very small relative to the costs borne by people experiencing gambling harm.¹⁰⁶
- As mentioned previously in this document, many of the people governed by the Council recognise the harms of gambling machines. In fact, a 2007 survey indicated that only 26% of people felt raising money through gambling did more good than harm.¹⁰⁷
- The industry has tried to frame the gradual decrease in non-casino gambling machine expenditure as a threat to community funding.
- **Figure C¹⁰⁸**



- The Lion Foundation figure above illustrates an uncomfortable truth about the return on a community's investment in gambling—for every \$2.50 lost to a gambling machine, only about \$1 is returned to the community. It is more sustainable to prevent that money being lost from the community in the first place.
- The industry has also tried to assert that the decrease in non-casino gambling machine expenditure has led to an increase in other forms of gambling. This is an unfounded claim, and it detracts from the real issue.

106 Centre for Social and Health Outcomes Research and Evaluation. (2008). Assessment of the social impacts of gambling in New Zealand. Auckland: SHORE. Retrieved 29 January 2013 from http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf

107 National Research Council. (2007). 2006/07 Gaming and betting activities survey: New Zealanders' knowledge, views and experiences of gambling and gambling related harm. Commissioned by the Health Sponsorship Council. National Research Council: Auckland.

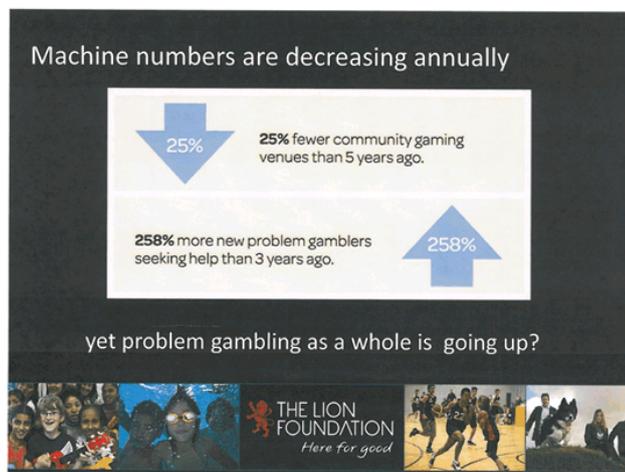
108 The Lion Foundation. (2011). Submission to the Invercargill City Council.



- The gambling machine industry is attempting to establish a causal relationship between these two trends. This supposed relationship has not been verified in any research.
- The gambling machine industry has ignored the Department of Internal Affairs' explanation for this trend; the DIA attributed the 2009/2010 increase in sports betting to the FIFA World Cup, and the lotteries increase to two unusually large jackpot draws.¹¹⁰
- While we should be concerned about the growth of online gambling, Councils are advised to bear in mind that this is not the issue at hand; Councils have no policy role to regulate online gambling.
- Online gambling also only represents a small fraction of people experiencing harm, compared with a majority of people experiencing harm from gambling machines. This policy review gives the Council an opportunity to reduce the extensive harm caused by non-casino gambling machines.
- The industry wants the council to feel that gambling restrictions will not have a meaningful impact on harm. They have attempted to use help-seeking statistics to demonstrate this.

¹⁰⁹ The Lion Foundation. (2011). Submission to the Invercargill City Council.

¹¹⁰ Department of Internal Affairs (DIA). (2010). Gamblers spent a little less in 2009/10. Retrieved 19-January 2012 from <http://www.dia.govt.nz/press.nsf/d77da9b523f12931cc256ac5000d19b6/8bdb1e0c7308dcb6cc2577ed0081c1a5!OpenDocument>



- While there is a correlation between gambling machine numbers and problem gambling, there is no significant correlation between machine numbers and help seeking. This graph implies that as gambling venue numbers decline, so too should help seeking. However, the number of people *receiving help* for problem gambling is not directly related to the number of gambling venues. Increases in seeking help is due to raised awareness and increased effectiveness of problem gambling help services.
- The industry themselves have inadvertently acknowledged this. For instance, when Dunedin reviewed their gambling policy in 2010, gambling machine trusts such as Pub Charity argued that the increase in help-seeking that year was unrelated to the existing gambling policy.
- The industry also claims “the best problem gambling solution is based on education, prevention, and treatment.” It is indeed such public health efforts (particularly the increase in radio and television ads promoting awareness of gambling harm, and other awareness-raising activities in the community) that have increased the number of people with gambling problems seeking help regardless of the number of venues.
- Still, research has indicated that regulating the accessibility of gambling plays an important role in reducing gambling and its harms. **The Council has the power to do this swiftly and effectively by implementing a “sinking lid” policy.**
- Numerous industry submissions claim that 98% of people are not “adversely affected” by gambling. This is a non-sequitur. People with gambling problems do not exist in a vacuum; their partners, children, and whanau are impacted by problem gambling, as are their workplaces and communities. Furthermore, the

111 The Lion Foundation. (2011). Submission to the Invercargill City Council.

relationship between gambling and harms such as crime and economic degradation suggest that we are all in some way adversely affected by problem gambling.

- The Jarrod True (TAB) submission also criticises the Problem Gambling Foundation, saying, “What the Problem Gambling Foundation doesn’t mention in their submissions is that when Professor Max Abbott looked only at the New Zealand data in 2006 he concluded that a sinking lid policy or a cap on machine numbers will have little (if any) impact on problem gambling.”
- It’s strange that the TAB submission would reference another Max Abbott study, since it previously attempted to discredit the statistical analysis that Professor Abbott and his colleagues completed together. The TAB submission doesn’t seem to mind this inconsistency, however.
- The TAB submission also skews the findings of this report, which does not actually “look only at New Zealand data.” Professor Abbott looks at a decade of international findings in order to convey the complexity of problem gambling issues, and the challenges surrounding the establishment of causation and the interplay of a variety of other factors. Abbott goes on to say that “it is apparent that future research, apart from refining the measurement of EGM exposure at macro and micro levels, will need to pay greater attention to the roles that other environmental and individual factors play in problem development and cessation.” This contemplative paper and call for additional research, if anything, should urge us to carefully consider and monitor gambling policy and its outcomes.
- Since the release of this paper, a later (2009) Abbott study found that for every new machine in a community, there is an increase of about 1 (.8) problem gamblers; the same study supported the view that restricting the per capita density of gambling machines leads to a decrease in gambling harm.¹¹² These sorts of causal impacts can have very real impacts on our communities.

112 Abbott, M., Storer, J., & Stubbs, J. (2009 December). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9 (3), 225 – 244. Retrieved 29 January 2013 from <http://www.tandfonline.com/doi/pdf/10.1080/14459790903257981>

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* MOTEKIAI FAKATOU
 Address* 80 EREBROKE CRESCENT
 Phone* 027 2955012 Email fabakou@xtra.co.nz
 If representing an organisation: Organisation name Methodist English speaking Congregation
 Position/title Minister

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

**Please note all submissions (including personal details of
submitters – name, address and phone numbers) will be public documents.**

.....
 1. In these areas of Wellington, I would like there to be... (tick one box per row)

	More pokies	The same amount of pokies	Fewer pokies
Southern Ward (97)			✓
Northern Ward (126)			✓
Eastern Ward (113)			✓
Onslow Ward (0)		✓	
Western Ward (35)			✓
Lambton (6)			✓
Central Area Zone (476)			✓

(Note: numbers in parentheses are current amount of pokies in each ward.)

2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time.

I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

Pokie machines contribute to problem gambling. Problem gambling can destroy relationships. I have worked with Pacific people where there is a huge sense of shame and whakama for gamblers. I see many broken families and relationships in our community that is caused by problem gambling.

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Julian Boorman
 Address* 29 Ellice Street, Mount Victoria
 Phone* 04 385 7665 Email _____
 If representing an organisation: Organisation name _____
 Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

Please note all submissions (including personal details of submitters – name, address and phone numbers) will be public documents.

1. In these areas of Wellington, I would like there to be... (tick one box per row)

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Northern Ward (126)			✓
Eastern Ward (113)			✓
Onslow Ward (0)		✓	✓
Western Ward (35)			✓
Lambton (6)			✓
Central Area Zone (476)			✓

(Note: numbers in parentheses are current amount of pokies in each ward.)

2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time.

I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

People/businesses that profit from gambling are parasitic. They pokies exploit the vulnerable (harming them) and do not add/contribute to society. The harm is not justified by donations from Pub Charities

(More space on the opposite page)

George Darroch

From: Problem Gambling Foundation of New Zealand <no-reply@wufoo.com>
Sent: Monday, 11 May 2015 2:54 p.m.
To: George Darroch
Subject: Make a submission - Wellington gambling policy [#9]

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Name * Caroline Glaser

Address * 
1/72 Makara Road Karori
Wellington 6012
New Zealand

Phone 04 476 3511

Number *

Email * carolineglasernz@gmail.com

Organisation Problem Gambling Foundation
name

Position/title Volunteer



Please tick this box if you would be willing to appear before Wellington City Council to give an oral submission.

Southern Fewer pokies

Ward (97) *

Northern Fewer pokies

Ward (126) *

Eastern Fewer pokies

Ward (113) *

Onslow The same amount of pokies

Ward (0) *

Western Fewer pokies

Ward (35) *

Lambton (6) Fewer pokies
*

Central Area Fewer pokies
Zone (476) *

2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time.

3. The Council is proposing to remove the requirement for venues to have liquor licenses. I support this option.

4. The Council is proposing to continue to allow TAB venues to establish I support this option.

anywhere
within
Wellington.

5. I would also like to say...

This is my second year of volunteering at local events to promote the good work that Problem Gambling Foundation are doing, and I really get a lot out of them and enjoy talking and meeting people. To see communities and organisations getting together to organise a great day out is really positive and gives hope. Last year I was struck by just how many people are affected by gambling. I had not realised just how much everyone around them is also so deeply affected, having no money left or attention, and feeling helpless to intervene, knowing that those pokies are just there with little else to do in some areas. They were so keen to help and do something through an effective organisation. This time I also learnt just how big an impact there is on communities as well as individuals, and is summed up by my seeing of the local gaming lounge in Taita promoting working together with communities. To then see many groups having their funding and workers cut, and the people organising the fair at Taita admitting to having funds from gambling as they could not get it from anywhere else. All day long we talked with people who were desperate to stop their gambling, and to not have it there around them all the time. Seems insane to profit out of poor communities, and then fund them from a small amount of their profit to have a day talking about how to stop gambling. All agree- they don't want the pokies.

44

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Jan Hall
 Address* 233 Riddiford Street
 Phone* 021-430-511 Email _____
 If representing an organisation: Organisation name —
 Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

Please note all submissions (including personal details of submitters – name, address and phone numbers) will be public documents.

1. In these areas of Wellington, I would like there to be... (tick one box per row)

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Central Area Zone (476)			

(Note: numbers in parentheses are current amount of pokies in each ward.)

2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time.

I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add... I support the sinking lid

I support the funds made in this ward be funded back to Newtown.

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Heather Carside
 Address* 39 Sydenham Street, WELLINGTON 6012
 Phone* 04 475-8855 Email heathercarside@orcon.net.nz
 If representing an organisation: Organisation name Wellington Methodist parish
 Position/title Member of Lam Congregation Leaders Meeting
 Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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Onslow Ward (0)			<input checked="" type="checkbox"/>
Western Ward (35)			<input checked="" type="checkbox"/>
Lambton (6)			<input checked="" type="checkbox"/>
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I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

Harm done to the community by gambling at police machines, and by other gambling opportunities too should not be increased by WCC's actions. There is certainly no need to make gambling available to those under 18yrs by allowing machines out of licensed premises!

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* EMMA MARBY

Address* 34 LINK RD NEWLANDS WELLINGTON

Phone* 0211294565 Email emma.marby@windotiore.com

If representing an organisation: Organisation name _____

Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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Western Ward (35)			<input checked="" type="checkbox"/>
Lambton (6)			<input checked="" type="checkbox"/>
Central Area Zone (476)			

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I support / do not support this option.

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I support / do not support this option.

5. I would like to add...

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Claire Campbell

Address* 33 Biddle Cres, Taita, Lower Hutt

Phone* 029 6500091 Email CampelaraBell@gmail.com

If representing an organisation: Organisation name _____

Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

**Please note all submissions (including personal details of
submitters – name, address and phone numbers) will be public documents.**

1. In these areas of Wellington, I would like there to be... (tick one box per row)

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I support / do not support this option.

5. I would like to add...

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* DRPALA MOLISA

Address* 8 MOIR ST

Email pala.molisa@vuw.ac.nz

Phone (day)* 021254 1956

Phone (alternative) _____

If representing an organisation:

Organisation name _____

Position/title _____

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Western Ward (35)			<input checked="" type="checkbox"/>
Lambton (6)			<input checked="" type="checkbox"/>
Central Area Zone (476)			<input checked="" type="checkbox"/>

(Note: numbers in parentheses are current amount of pokies in each ward.)

2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time. I support / do not support this policy.

3. I would like to add... Pokies exploit poverty-stricken & more vulnerable communities, they feed & reinforce despair, they exacerbate family breakdown & contribute to culture of domestic violence
(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Elke Diedrichs

Address* 56 Rosetta Road

Email elke.diedrichs@wellington.goethe.org

Phone (day)* 04 385 6924

Phone (alternative) 021 521309

If representing an organisation:

Organisation name _____

Position/title _____

Please note all submissions (including personal details of submitters – name, address and phone numbers) will be public documents.

Please tick this box if you would be willing to appear before Wellington City Council to give an oral submission.

1. In these areas of Wellington, I would like there to be... (tick one box per row)

	More pokies	The same amount of pokies	Fewer pokies
Southern Ward (97)			✓
Northern Ward (126)			✓
Eastern Ward (113)			✓
Onslow Ward (0)			✓
Western Ward (35)			✓
Lambton (6)			✓
Central Area Zone (476)			✓

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(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* B. KINRAID
 Address* 74 Kilbirnie Cres.
 Phone* 0212541169 Email _____
 If representing an organisation: Organisation name _____
 Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

(More space on the opposite page)

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Contact name* Charlotte Martin

Address* 94/11 Arlington St, Mount Cook

Email _____

Phone (day)* 0224129913

Phone (alternative) _____

If representing an organisation:

Organisation name _____

Position/title _____

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Lambton (6)			✓
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3. I would like to add...

they run families + take them out.

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Graham Goodisson

Address* 1/1 Tasman St Mt Cook

Email 1000graham@gmail.com

Phone (day)* 021 318949

Phone (alternative) _____

If representing an organisation:

Organisation name _____

Position/title _____

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Western Ward (35)			<input checked="" type="checkbox"/>
Lambton (6)			<input checked="" type="checkbox"/>
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2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time. I support / do not support this policy.

3. I would like to add...

More opportunities to gamble is not a solution.

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* PHILOMENA NZIRAMASANGA

Address* 1 E/255 THE TERRACE WELLINGTON

Phone* 021160 4163 Email philonziramasing

If representing an organisation: Organisation name SELF

Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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Western Ward (35)			
Lambton (6)			
Central Area Zone (476)			✓

(Note: numbers in parentheses are current amount of pokies in each ward.)

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I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

Destroys lifes/family and community.

(More space on the opposite page)

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Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Kim Abrahams

Address* 22 Redies drive Belmont

Phone* 021-668704 Email _____

If representing an organisation: Organisation name _____

Position/title Personal Banker

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

(More space on the opposite page)

Item 2.1 Attachment 2

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *

Contact name* Bridget Macfarlane
 Address* 14 Wyndrum Ave, Waterloo, Lower Hutt 5011
 Phone* 021 101 6520 Email bridget.macfarlane@gmail.com
 If representing an organisation: Organisation name _____
 Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

**Please note all submissions (including personal details of
submitters – name, address and phone numbers) will be public documents.**

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I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Te Po Hohua

Address* 59 Duncan Tce

Email TePoHohua@gmail.com

Phone (day)* 021 08252205

Phone (alternative) _____

If representing an organisation:

Organisation name _____

Position/title _____

Please note all submissions (including personal details of submitters – name, address and phone numbers) will be public documents.

Please tick this box if you would be willing to appear before Wellington City Council to give an oral submission.

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(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* JOHN RAWLS

Address* Appt Apt 135, 40 The Terrace, Wellington 6011

Email jprawls@hotmail.com

Phone (day)* 020 456 7809

Phone (alternative) -

If representing an organisation:

Organisation name -

Position/title -

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Please tick this box if you would be willing to appear before Wellington City Council to give an oral submission.

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3. I would like to add...

Pokies destroy lives.

(More space on the opposite page)

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Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* Kim Keeble

Address* 1 Haell St, Newtown, Wellington

Phone* 0210427824 Email kimmyarty@hotmail.com

If representing an organisation: Organisation name _____

Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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submitters – name, address and phone numbers) will be public documents.**

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I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

I Dont support this type of addiction!!

(More space on the opposite page)

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Contact name* Bethaney McRennan

Address* 29 Cecil Rd, Wadestown WH-6018

Phone* 4720884 Email _____

If representing an organisation: Organisation name _____

Position/title FO

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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I support / do not support this policy.

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I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.
I support / do not support this option.

5. I would like to add... Gambling tends to encourage those who can't afford to, to "live in hope" + those who have money to waste to throw it away when many poor + struggling people could benefit from it. It also occurs
(More space on the opposite page)

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corrupt practices on the part of the
~~own~~ business ownership. & despite
the fact that some claim to support
charities, sport, etc any sharing
is a ~~small~~ scant fraction of the
over all gains

this is a most ill advised proposal

Please return completed form to PGF, either in print or scanned form, to:

Email: pgf@pgfnz.org.nz

Mail: PO Box 6506, Marion Square, Wellington 6141

115

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* VILIAMI FINAU
 Address* 88 ORIEL AVE
 Phone* (04) 2322290 Email viliami@wesleychurch.org.nz
 If representing an organisation: Organisation name _____
 Position/title MINISTER OF TONGAN CONGREGATION.

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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submitters – name, address and phone numbers) will be public documents.**

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I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

What is the benefit of having more pokie machines in Wellington?
This is the question I ask when I see:
- Tongan parents take their young children to a venue, only
to neglect them while they go play on these machines.

(More space on the opposite page)

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- Parents spending their money on pokie machines and not on the groceries for their families.

- The damage to family relationships caused by problem gambling.

Again, I ask: what is the benefit of pokie machines in Wellington?

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Mail: PO Box 6506, Marion Square, Wellington 6141

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Contact name* Kalyb Masoe-Hewitt

Address* 47 Boulcott St

Email Kalybmasoe22@gmail.com

Phone (day)* 027 817 15 17

Phone (alternative) " "

If representing an organisation:

Organisation name _____

Position/title _____

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(More space on the opposite page)

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Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* WELLINGTON POVERTY ACTION / PAUL STEVENSON
 Address* 26A Wrentham Ave Nelson
 Phone* 476-7024 Email WellingtonPovertyAction@gmail.com
 If representing an organisation: Organisation name _____
 Position/title FOUNDER

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

Please note all submissions (including personal details of submitters – name, address and phone numbers) will be public documents.

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I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add... THIS IS EXTREMELY HARSH ON

THE POOR SOCIETY

(More space on the opposite page)

NEWTOWN BUDGETING & ADVOCACY SERVICE

Level 1
94 RIDDIFORD STREET
NEWTOWN
PH: 04 389 8121
EMAIL: newtownbudget@xtra.co.nz

14th May 2015

Wellington City Council
P.O. Box 2199
WELLINGTON

RE – Submission on Gambling Policy

Dear Wellington City Council,

I am writing on behalf of the Newtown Budgeting and Advocacy Service to express concern about current proposals to increase the availability of gambling machines in the Wellington area.

Our service regularly sees people who are suffering due to financial problems and this often includes debt due to addictions including gambling. This addiction causes a great deal of shame for people. It is often when things are really serious that they decide to look for help. We have noticed that this can affect people from all walks of life. An example would be of a man on a very good income who had no money left for food because he had borrowed from so many sources to support his addiction to using these machines. This addiction not only ruins the individual's life but can also cause harm to surrounding family and society as a whole.

I understand that other cities in New Zealand have adopted a sinking lid to decrease numbers of venues and machines over time so it is disappointing to hear that Wellington are considering such big increases in numbers.

In summary our service would like to make the following recommendations.

- Make no increase in the availability of gambling machines in Wellington.
- Adopt a sinking lid policy to decrease numbers of machines overtime.

We trust that you will take into account this submission when making a final decision. I would appreciate the opportunity to also make an oral submission.

Yours sincerely

Geoff Curson
Coordinator.

Submission to the Wellington City Council – Gambling Venues Policy

Firstly, although I work at the Problem Gambling Foundation, this is a personal submission, prompted by my concern for the city in which I live.

1. I do not support an unlimited number of pokie machines in the central city area.
2. I do not support the allowance for machines to be moved (relocate) without applying for a new license if they:
 - relocate to or within the central zone; or
 - relocate to or within an area identified as a "centre" in the Wellington District Plan; and
 - the NCGMs at the new venue would not mean that any zone would be above its limit of machines.
3. I do not support the lowering of the maximum limits that were established in the 2010 policy, so that no more than two further venues can be established in any zone.
4. I do not support the removal of the requirement for pokie venues to hold an alcohol license.
5. I do not support the allowance of TAB venues to be established anywhere in the Wellington District.
6. I would like the Council to consider adopting a sinking lid policy, and if so, would fully support its adoption.
7. I would like an opportunity to make an oral submission.

Prior to my current role, I had very little awareness of problem gambling in our community. You could say I had a relatively naïve understanding of problem gambling. What it is exactly, the impact it has on people, and how it came to exist in the first place. Over the past eighteen months or so, my awareness and knowledge of problem gambling has grown considerably. This has highlighted not only the hidden and invisible nature of problem gambling as an addiction, but also what seems to me very little awareness of gambling harm in the wider community and the complexity of the environment that fosters it.

Firstly, it was quite disconcerting to learn that compared to the general population, Pacific people are significantly affected by problem gambling. Furthermore, in addition to the research available about gambling harm, the more powerful learning for me has come about through engaging with people. Listening to them share about their experience, their reality, and their life with gambling harm. For many of them, it is gambling harm that has been caused by pokie machines.

I am gravely concerned about the possible increase in availability of pokie machines in Wellington. These machines are harmful and can insidiously eat away at a fundamental element of our community – relationships. As a Samoan, relationships are at the core of who we are and our sense of identity in our family and in our community. Thus highlighting the significance of this type of gambling harm for Samoans.

The stories people have shared with me reveal gambling harm that is significant and multifaceted. Harm that is not limited to, but includes the breakdown of families, the loss of trust in couples, the loss of financial ability to provide for their family, the fear of potential violence inflicted on a family due to money loans, the shame and stigma of gambling and its impact on one's sense of identity, self-worth, and belonging.

Yes, I do acknowledge the benefits of community funding available through the provision of pokie machines. However, I also pose the question: at the end of the day, does this benefit outweigh the cost?

Regarding the proposed policy, I do not think it does enough to curb the growth of pokie machines in the Wellington. It also does not do enough to reduce or minimise their impact on our community.

A sinking lid policy would ensure the number of machines does not increase. I fully support a sinking lid policy for Wellington, as one of a number of ways that the harms of gambling can be addressed.

In closing, I would like the Council to consider this well-known whakataūki:

Hutia te rito o te harakeke,	<i>If the heart of the harakeke was removed,</i>
Kei whea te kōmako e kō?	<i>Where will the bellbird sing?</i>
Kī mai ke ahau;	<i>If I was asked,</i>
He aha te mea nui o te Ao?	<i>What is the most important thing in the world;</i>
Māku e kī atu,	<i>I would be compelled to reply,</i>
He tāngata, he tāngata he tāngata.	<i>It is people, it is people, it is people!</i>

Fa'afetai tele lava,

Fuailalagi Samoa Saleupolu Heger
16b Liddel Grove
Island Bay
Wellington 6023

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *. 174

Contact name* Barney Wikitera
 Address* 72B Cuadela Crescent, Cuadela Village
 Phone* 0211834820 Email barney.wikitera@gmail.com
 If representing an organisation: Organisation name _____
 Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

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 I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.
 I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.
 I support / do not support this option.

5. I would like to add...
-I am in full support of reducing gambling harm in all forms through a decrease in gambling choices.
-Pokies are one form of gambling that causes harm to families, becoming addictive + det. mental.

(More space on the opposite page)

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *. 174

Contact name* Lise Jubilee Wikitara
 Address* 223 Cuadalupe Crescent Avenala Village
 Phone* 0211795772 Email lj.mataeimi@gmail.com
 If representing an organisation: Organisation name _____
 Position/title _____

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

Please note all submissions (including personal details of submitters – name, address and phone numbers) will be public documents.

1. In these areas of Wellington, I would like there to be... (tick one box per row)

	More pokies	The same amount of pokies	Fewer pokies
Southern Ward (97)			<input checked="" type="checkbox"/>
Northern Ward (126)			<input checked="" type="checkbox"/>
Eastern Ward (113)			<input checked="" type="checkbox"/>
Onslow Ward (0)			<input checked="" type="checkbox"/>
Western Ward (35)			<input checked="" type="checkbox"/>
Lambton (6)			<input checked="" type="checkbox"/>
Central Area Zone (476)			<input checked="" type="checkbox"/>

(Note: numbers in parentheses are current amount of pokies in each ward.)

2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time.

I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

I am in full support of reducing gambling harm in all forms through a decrease in gambling choices.

(More space on the opposite page)

Submitter Details

First Name: **Denise**
Last Name: **Roche**
Organisation: **Green Party of Aotearoa New Zealand**
Street: **Floor G, Bowen House, 1 Bowen Street**
Suburb: **Wellington Central**
City: **Wellington**
Country:
PostCode: **6011**
Daytime Phone: **04 817 6763**
Mobile: **0211802506**
eMail: **denise.roche@parliament.govt.nz**

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission

Question 1: Do you agree with the proposed changes in the draft policy?

The proposed changes include:

Continuing to place maximum limits on the number of machines in most geographic areas. As with the existing policy, no limit would apply in the central city area.

- Yes
 No

Lower the maximum limits that were established in the 2010 Policy so that no more than two further venues can be established in any zone. In practice this means the new limits would be the lesser of:

- the existing number of NCGMs in an area plus 18; or
- the current cap.

- Yes
 No

Allow venues to relocate and take their existing entitlement of machines with them, but only provided:

- they relocate to or within the central zone; or
- they relocate to or within an area identified as a "centre" in the Wellington District Plan; and
- the NCGMs at the new venue would not mean that any zone would be above its limit of machines.

- Yes
 No

Remove the requirement that only premises with an alcohol on-licence can be NCGM venues, but only where any NCGM venues without an on-licence are located in "centres" identified in the Wellington District Plan.

- Yes
 No

Retain the existing policy on Racing Board venues, meaning they may be established anywhere in the Wellington District, subject to the provisions of the Wellington City District Plan.

- Yes
 No

Question 2: If you disagree with any of the proposed changes in Question 1, can you provide additional information on your position?

Comments

Given the amount lost on pokie machines in Wellington and the potential harm caused by these machines I believe the Council should introduce a sinking lid policy that would reduce the numbers of pokies over time. Since 2010 the current policy of capping the number of pokie machines has only resulted in a reduction of 42 machines. I do not support the policy allowing for venues to relocate within specified zones because again it maintains the nett affect of the same number of machines being available and consequently the same amount of harm being caused.

Question 3: Do you have any other suggestions or feedback?

Comments

While the numbers of people with problem gambling behaviours are low around 40% of the proceeds from gambling come from those people. Until such time as electronic gambling machines can be made safe - (for example with pre-commit cards and real-time player tracking) the Council should have a duty of care to problem gamblers reduce gambling opportunities.

Attached Documents

File
The Review of the Gambling Venues Policy 2010



21 May 2015

Cr Paul Eagle
The Chair
Community, Sport and Recreation Committee
Wellington City Council
PO Box 2199
Wellington

Dear Sir

RE: Submission of Pub Charity on Proposed 2015 Gambling Venues Policy

Pub Charity is one of the largest class 4 gaming operators in New Zealand and operates 2 of its 154 venues in the Wellington City Council area, being 1841 Bar & Restaurant in Johnsonville and The Waterloo Bar & Grill in the CBD.

Between May 2014 and April 2015 Pub Charity distributed \$743,478.00 to 143 local community organisations, and a further \$3,840,419.00 drawn from funds raised across the country distributed to 50 national and regional organisations based in Wellington.

Pub Charity supports the 2015 policy proposal as written and would like to speak to the Committee on the matter.

Comments

Consultation Documents - I have been involved in making submissions to Local Government on gambling policy since they were first required to be reviewed in 2006. My roles, initially at the Lion Foundation, and since 2007 at Pub Charity have involved commenting on policy from the Far North to Invercargill.

The common issue is the dearth of accurate information for decision makers substituted in many cases by emotive rhetoric.

I want to congratulate Council staff who have provided a balanced briefing document and a reasonable policy.

Problem Gambling Prevalence – Prior to 1999 problem gambling was treated as a mental health issue in keeping with its origins as a control disorder, with interventions and treatment focussed on individuals managed by central government agencies.

In 1999 this approach was abandoned and a public health approach was adopted shifting responsibilities to the community at large including local government. In an environment where the regulating agency controls the environment this can be an effective strategy. With gambling

Pub Charity Limited
L2, 190 Taranaki Street, PO Box 27009, Wellington 6141
P - 04 385 6100 F - 04 384 1630 E - enquiries@pubcharitylimited.org.nz
W - www.pubcharitylimited.org.nz

however local government does not have total control or responsibility of the gambling environment limiting the potential efficacy of policy.

Control is further undermined by the rapid growth of internet gambling enabled by the expansion of high speed broadband.

Many critics of the sector ignore the reality of this situation and adopt a simplistic approach to policy claiming exposure as the direct driver of problem gambling prevalence in the community.

In fact the evidence is to the contrary. While not a direct proxy for harm rates of help seeking for gambling issues as reported by the Ministry of Health is used by all parties as an indication of prevalence rates.

Those reports show help seeking rates in decline while gaming machine numbers doubled between 1993 and 2003 and those same rates increasing in certain periods post 2003 as gaming machine numbers declined substantially.

Also contradicting the exposure = harm mantra are the facts that areas of high exposure ratios like Selwyn and Buller help seeking rates are extremely low and in some years nil. This contrasts with areas like Manukau and Auckland City which actually have very low rates of 'exposure' per head of population but higher rates of help seeking.

Interestingly between 2007-2010 problem gambling help seeking rates spiked while gaming machine numbers decline rapidly. This gives some clues to the macro-environmental factors that factor in many issues of social harm.

Conclusion

Class 4 gambling is source of entertainment, lawful gambling, and a very significant fund raising activity for Wellington community groups.

Pub Charity believes the Council, with his policy, continues to strike a good balance between managing public health responsibilities, supporting commercial and community interests, public freedoms to legally participate in class 4 gambling, and the realities of the limited nature of the efficacy of this type of public health tool.

Yours sincerely



Martin Cheer
Chief Executive

WCC TLA & Wgtn Based National Donations 1 May 2014 to 30 April 2015			
TLA Name	Applicant Name	Purpose	Amount
Wellington City	Wellington Regional Orchestra Foundation	Music hire, van lines equipment cartage, Orchestra travel & music in schools program	\$ 10,000.00
Wellington City	Netball Wellington Centre Inc	Tournament costs	\$ 6,000.00
Wellington City	Wellington Rugby Football Union	Ground hire	\$ 9,000.00
Wellington City	Wellington Floorball Club Inc	Venue hire	\$ 2,000.00
Wellington City	Sport Wellington	Audio, visual, lighting, trophy design and production costs	\$ 10,000.00
Wellington City	North Wellington Junior Football Club	Coaching services	\$ 6,000.00
Wellington City	Cricket Wellington	Lighting improvements to the Basin Reserve Indoor Nets	\$ 18,533.00
Wellington City	Capital Swim Club	Pool lane hire for 3 months	\$ 5,000.00
Wellington City	Wellington Repertory Theatre Inc	Advertising costs	\$ 500.00
Wellington City	Northern United Hockey Club Inc	Goal keeper gear and training gear	\$ 354.65
Wellington City	Johnsonville Rugby Football Club Inc	Refurbishment of clubs kitchen	\$ 15,000.00
Wellington City	Wellington Rugby Football Union	Entry fees	\$ 5,000.00
Wellington City	Wellington Regional Asthma Society Inc	Salary	\$ 18,864.00
Wellington City	Dance Aotearoa NZ Ltd	Technical and production costs	\$ 5,000.00
Wellington City	Wellington Jazz Orchestra	Musical arrangements and CD production and design only	\$ 5,088.50
Wellington City	Johnsonville Softball Club Inc	2014-2015 WCC season ground fees	\$ 2,673.91
Wellington City	Johnsonville Softball Club Inc	White softball knickers and blue belts	\$ 2,868.26
Wellington City	Cricket Wellington	Hutt City Council ground fees	\$ 10,000.00
Wellington City	Wellington Repertory Theatre Inc	Costs for printing posters and flyers	\$ 330.00
Wellington City	Wellington Museum Trust	Venue hire costs	\$ 2,000.00
Wellington City	Dance Aotearoa NZ Ltd	Performance costs and coordination of the Swan Dancehall project costs	\$ 3,632.00
Wellington City	Wellington Regional Orchestra Foundation	Venue hire, equipment cartage, programmes and venue hire	\$ 3,000.00
Wellington City	Youthdance Education Trust	Costs towards the running of International Dance Day 2015	\$ 3,114.00
Wellington City	Netball Wellington Centre Inc	Flights	\$ 4,000.00

Wellington City	Johnsonville Rugby Football Club Inc	Rugby equipment	\$ 12,000.00
Wellington City	Port Nicholson Poneke Cycling Club	Accommodation	\$ 4,000.00
Wellington City	Khandallah Croquet Club Inc	Jims mowing in March and April	\$ 1,095.00
Wellington City	Capital Swim Club	Pool lane hire from March to December 2015	\$ 5,000.00
Wellington City	Storm Marching Team	Accommodation	\$ 4,000.00
Wellington City	Johnsonville Softball Club Inc	Vehicle hire	\$ 2,563.48
Wellington City	Wellington Floorball Club Inc	Venue hire for the month of march	\$ 3,000.00
Wellington City	St Mary's College	New rowing boat	\$ 10,000.00
Wellington City	Kaibosh	Annual licence fees and blackboard payment services credit card	\$ 3,731.18
Wellington City	Dress For Success Wellington	4 x pedestal fans and battery powered cash register	\$ 930.00
Wellington City	Throughblue	Meeting room hire for two hours every Friday	\$ 2,691.00
Wellington City	Kidzstuff Theatre For Children Inc	Costume, printing, design and lighting hire costs	\$ 2,325.00
Wellington City	Newlands Scout Group	Retaining wall	\$ 7,877.50
Wellington City	Healthy Future Families Trust	Evaluation to determine the effects of the garden to table programme	\$ 9,000.00
Wellington City	Wellington Sexual Abuse Network	Laptop, speakers and projector	\$ 1,350.30
Wellington City	Island Bay Softball Club Inc	Wgtn city council ground fees	\$ 2,490.00
Wellington City	Parafed Wellington Inc	Programme costs 2015	\$ 10,000.00
Wellington City	Twisters Tawa Gymnastic Club Inc	20x Leotards	\$ 3,340.57
Wellington City	Capital Sports Performance Inc	Travel and accommodation	\$ 4,646.00
Wellington City	Crofton Downs Primary School	Reading recover readers	\$ 503.53
Wellington City	Maranui Surf Life Saving Club	Compressed air line, bucket hats, caps, nipper rash vests and competition hats	\$ 3,000.00
Wellington City	Canteen Central	Key youth worker for member services and patient services salaries	\$ 10,000.00

Wellington City	Queen Margaret College Inc	Set of intermediate sculling rowing blades	\$ 3,429.56
Wellington City	Diabetes Wellington Inc	Cover costs of the field officer's carpark for six months	\$ 350.43
Wellington City	Sri Lankan Seniors Assn Inc	Bus hire	\$ 1,000.00
Wellington City	SCANZ - TS Amokura	Replacement for Viking wooden safety boat	\$ 5,000.00
Wellington City	Sri Lanka Assn Of NZ	Support the Cultural Training workshop	\$ 1,000.00
Wellington City	Tawa Intermediate School	Artificial Sports Turf	\$ 5,000.00
Wellington City	Diabetes Wellington Inc	Communication costs for 12 months	\$ 3,621.70
Wellington City	Maranui Surf Life Saving Club	1 rescue board only	\$ 1,950.00
Wellington City	Twisters Tawa Gymnastic Club Inc	Gymnastic equipment	\$ 5,000.00
Wellington City	Crofton Downs Primary School	Outdoor canvas curtains	\$ 1,450.00
Wellington City	Wellington Womens Boarding House	New beds and painting and maintenance of bedrooms	\$ 4,600.00
Wellington City	Radio Heritage Foundation	Office and technology equipment	\$ 888.17
Wellington City	Wellington Region Kidney Society Inc	Electric lifting chair, medical drip stands, sharps bin yearly collection and medical cleaning kits	\$ 4,000.00
Wellington City	Kilbirnie Branch NZ Society Of Genealogist	Hiring of kitchen equipment and heaters	\$ 1,158.49
Wellington City	Menzshed Wellington	Rent	\$ 2,166.68
Wellington City	United Sri Lanka Assn Inc	Hall and facilities hire	\$ 3,910.00
Wellington City	Probus Club of Johnsonville	Bus Travel	\$ 602.60
Wellington City	Girl Guiding NZ Wellington East District	Seminar fees	\$ 1,913.04
Wellington City	Southern Cross Kids Camp NZ	Camp site hire of Palm Grove	\$ 5,000.00
Wellington City	Tawa Rugby Football Club Inc	Installation of synthetic turf	\$ 10,000.00
Wellington City	Wellington Hockey Association Inc	Van hire	\$ 1,694.00
Wellington City	Squash Wellington	Travel, accommodation and entry fees	\$ 6,052.00
Wellington City	Wellington Lacrosse Assn	Pitch hire for the league game days	\$ 3,240.00
Wellington	Te Tai Timu Club	Accommodation and	\$ 4,072.00

City		tournament costs	
Wellington City	Tawa Swimming Club	Infinity start system	\$ 2,384.37
Wellington City	Wellington Basketball Association	Tournament controller only	\$ 3,450.00
Wellington City	Western Suburbs Rugby Football Club Inc	Increase internal lights in clubrooms	\$ 6,200.00
Wellington City	Tawa Junior Football	Coaching and gear costs	\$ 2,903.48
Wellington City	Netball Central Zone Ltd	Accommodation for the U23 Representative team to attend championships	\$ 4,434.78
Wellington City	Wellington Water Polo Board	Accommodation and van hire for womens U20 Women's Pan Pacific games	\$ 2,500.00
Wellington City	Marist St Pats Rugby Club Inc	Laptop	\$ 1,000.00
Wellington City	Wellington Rowing Club	Uniforms & vehicle/boat transport	\$ 1,453.00
Wellington City	Table Tennis Wellington Assn Inc	Venue hire	\$ 1,500.00
Wellington City	Choirs Aotearoa NZ Trust	Accommodation and marketing costs	\$ 2,000.00
Wellington City	Wellington Wander Search	Tracking receiver, magnetic base and handheld aerials and radio pendants	\$ 4,962.25
Wellington City	RNZPS - Wellington Branch Inc	Painting of roof and exterior rooms	\$ 8,000.00
Wellington City	Gillies McIndoe Research Institute	Living costs	\$ 7,000.00
Wellington City	Wellington Hospitals & Health Foundation	T1 Ventilator	\$ 39,735.00
Wellington City	Wellington Basketball Association	Travel	\$ 10,000.00
Wellington City	Newlands College	Costs to attend the National Secondary School Netball Championships	\$ 2,843.48
Wellington City	Pride Awards Trust	DVD award footage	\$ 1,730.75
Wellington City	Oriental Bay Residents Association Inc	2 x new swimming rafts for Oriental Bay	\$ 5,000.00
Wellington City	Liberty Swing Band Inc	Accommodation	\$ 3,270.00
Wellington City	Wellington Region Free Kindergarten Assn - Paparangi	Two laptops	\$ 3,150.00
Wellington City	House Of Grace Trust Inc	Everyday running costs	\$ 5,000.00
Wellington	Redwood Club	Dining room chair	\$ 528.00

Wellington City	Olympic Harrier Club	Running coach costs	\$ 3,150.00
Wellington City	Camp Quality - Wellington Central	Transport costs	\$ 9,173.91
Wellington City	Eastern Suburbs Cricket Club	Cricket equipment	\$ 5,000.00
Wellington City	Special Olympics Mana	Accommodation and transport	\$ 1,715.45
Wellington City	Tawa Bowling Club	Club shirts and jackets	\$ 5,575.00
Wellington City	Kiwi Athletic Club	MTA petrol vouchers	\$ 1,500.00
Wellington City	Wellington Hockey Association Inc	Travel and accommodation costs	\$ 7,500.00
Wellington City	North Wellington AFC	Accommodation, entry fees and travel	\$ 6,583.97
Wellington City	Johnsonville Bowling Club	Contract for green keeper	\$ 5,000.00
Wellington City	Wellington Hockey Association Inc	Accommodation costs to attend National Tournament in Palmerston North	\$ 5,000.00
Wellington City	Tawa Association Football Club Inc	Hire of training ground and 2 rental cars	\$ 2,973.00
Wellington City	Age Concern Wellington Inc	2x ex-lease computers monitors, software, installation and configuration costs	\$ 2,473.40
Wellington City	Hutt Hockey Club Inc	Practice and match hockey balls	\$ 2,500.00
Wellington City	Wellington Russian Club Charitable Trust	Costs for the Russian-speaking Cultural Festival 2014	\$ 3,500.00
Wellington City	Kidzstuff Theatre For Children Inc	Costume, publicity and lighting hire costs	\$ 1,578.43
Wellington City	Wellington After Care Assn	Computers	\$ 9,024.00
Wellington City	Wellington Basketball Association	Accommodation	\$ 3,200.00
Wellington City	Wellington Multiple Sclerosis Society	Salary assistance	\$ 25,000.00
Wellington City	Emerge Supported Employment Trust	Laptop computer	\$ 1,695.00
Wellington City	Mary Potter Hospice Foundation Wgtn	Upgrading of air conditioning	\$ 26,063.00
Wellington City	Rnzps Onslow Branch	set up course resources only	\$ 3,150.00
Wellington City	Nota Bene	Contribution to venue hire and musician fees	\$ 1,985.00
Wellington	Arts Access Aotearoa	contractor to deliver training	\$ 3,200.00

City		only	
Wellington City	Newlands School	Chromebooks for all students	\$ 10,050.00
Wellington City	Tawa-Lyndhurst Tennis Club	Purchasing eight championship level tennis nets	\$ 3,027.95
Wellington City	Johnsonville Lawn Tennis Club	Technifibre tennis balls	\$ 1,400.00
Wellington City	Wellington Regional BMX Association Inc.	Awards	\$ 1,681.01
Wellington City	North Wellington AFC	Towards costs of footballs and playing shirts	\$ 9,994.77
Wellington City	Stagecraft Theatre Inc	90 x auditorium chairs	\$ 2,500.00
Wellington City	Creative Capital Arts Trust	Printing of the program booklet for the 2015 NZ Fringe Festival	\$ 5,000.00
Wellington City	Post & Anti-Natal Distress Support Group	New laptop computers	\$ 2,248.00
Wellington City	Challenge 2000	Summer School holiday programme	\$ 1,208.67
Wellington City	He Whanau Manaaki o Taraua Free Kindergarten - Johnsonville West	Excavation and construction costs outdoor development project	\$ 3,000.00
Wellington City	Kahurangi Friends Inc	Design costs for Kotahi and outdoor family evening	\$ 500.00
Wellington City	Wellington Softball Assn	Hireage of 11 grass diamonds and 5 lime diamonds for the season	\$ 8,000.00
Wellington City	Tennis Central Region Incorporated	Medals and trophies only	\$ 2,028.00
Wellington City	Karori Sanctuary Trust Inc.	projector lamps	\$ 10,167.00
Wellington City	Male Survivors of Sexual Abuse Trust - Wellington	Computer System including Hardware and Software for Peer Support	\$ 4,215.03
Wellington City	Tawa Association Football Club Inc	Annual Hilton Petone preseason tournament	\$ 869.00
Wellington City	Tawa Rugby Football Club Inc	Funding to assist with medical supplies, training and playing equipment etc as per resolution	\$ 5,000.00
Wellington City	Polish Senior Citizens Club	Members outing to Paraparaumu in February 2015	\$ 631.30
Wellington City	Samaritans Of Wellington	Writing a book on the history of Samaritans of Wellington	\$ 5,000.00
Wellington City	Marist St Pats Rugby Club Inc	Weights and associated gym equipment	\$ 1,088.70

Wellington City	Newlands Softball Club	Air travel to the National Clubs Tournament	\$ 4,104.00
Wellington City	Tennis Central Region Incorporated	New signage	\$ 2,678.00
Wellington City	Wellington Basketball Association	Accommodation	\$ 3,000.00
Wellington City	Johnsonville Cricket Club	Cricket gear and rental of the Farnborough centre	\$ 11,000.00
Wellington City	Brain Injury Assn Wellington Inc	Travel costs and monthly support group meeting	\$ 2,800.00
Wellington City	Ronald Mcdonald House Wellington Trust	Renovations and refurbish	\$ 50,000.00
Wellington City	Johnsonville Cricket Club	Playing equipment only	\$ 3,100.31
Wellington City	SANZ Brooklyn	Refurbishment of toilet and bathroom area	\$ 5,000.00
Grand Total	Wellington City Total	143	\$ 743,477.56
TLA Name		Purpose	Amount
National	Applicant Name	Database costs	\$ 20,000.00
National	Basketball NZ Inc	Airfares	\$ 5,913.04
National	Basketball NZ Inc	Writers in schools programme	\$ 5,000.00
National	Nz Book Council Inc	Part venue hire	\$ 4,500.00
National	Musical Theatre NZ Inc	Salary of a General Manager	\$ 5,000.00
National	Musical Theatre NZ Inc	Design and Printing of the Musical theatre NZ strategic plan 2015 - 2020	\$ 4,000.00
National	Musical Theatre NZ Inc	Writers in schools, office administration and promotional materials	\$ 5,000.00
National	Nz Book Council Inc	Key operating expenses for 12 months and major touring costs	\$ 350,000.00
National	Royal NZ Ballet	Venue costs	\$ 5,000.00
National	Chamber Music New Zealand Trust	The Circular costs per year	\$ 6,000.00
National	National Council Of Women Of Nz Inc	Venue costs	\$ 5,000.00
National	Chamber Music New Zealand Trust	Accommodations, venue hire and printing of catalogues	\$ 16,658.39
National	Central Dog Obedience Region	Advertising and medals	\$ 3,962.00
National	NZ Kung-Fu Wushu Federation Inc	Trainers for 3 months	\$ 3,215.00

National	NZ Epilepsy Assist Dogs	Kowhai Trees	\$ 1,035.00
National	NZ Bird Rescue Charitable Trust	Community Operational expenditure	\$ 325,000.00
National	Life Education Trust NZ	Operating costs of 12 mobile classrooms	\$ 100,000.00
National	Life Education Trust NZ	Two computers and software	\$ 5,849.64
National	Save Animals From Exploitation Inc	Equipment, travel and uniform	\$ 2,000.00
National	NZ Police Pipe Band	Producing 2,500 copies of the Palliative Care Handbook	\$ 9,910.00
National	Hospice NZ	Hire of equipment for the gala evening and art storage racks	\$ 4,000.00
National	NZ Affordable Art Trust	5x Tablets including accessories, camera and voice recorder	\$ 4,180.00
National	NZ Indian Central Association Inc	Audio visual requirements	\$ 5,000.00
National	NZ Federation of Graduate Women Inc - Wellington Branch	Venue hire and medals	\$ 7,500.00
National	Union Of NZ Karate Organisations Inc	Travel and accommodation costs	\$ 20,000.00
National	Nz Orienteering Federation	Team uniforms	\$ 5,000.00
National	Floorball NZ Inc	Bus Hire and Accommodation	\$ 5,600.00
National	Brass Band Assn of NZ Inc	Construction of the future exhibit Meet the Locals project	\$ 500,000.00
National	Wellington Zoo Trust	Core operating costs	\$ 350,000.00
National	Life Education Trust NZ	5 x Medela Lactina and 5 x Medela Symphony breastpumps to support neonatal families	\$ 24,815.35
National	Neonatal Trust NZ	Redesign of the Birthright NZ logo and tagline	\$ 1,805.00
National	Birthright NZ Inc	Recruitment, training and building of volunteer scout leaders	\$ 50,000.00
National	Sanz - NZ	uniforms only	\$ 3,500.00
National	Climbing NZ Inc	Contractor fees for the Sport Development Officer	\$ 5,000.00
National	NZ Croquet Council Inc	The 4th Annual NZ Marist North verse South Primary Schools match	\$ 29,878.50
National	NZ Marist Rugby Football Federation	Accommodation	\$ 8,000.00
National	Brass Band Assn of NZ Inc	Split Tour concerts (North Island)	\$ 25,000.00
National	Nz Symphony Orchestra	Veterinary fees and some travel expenses	\$ 6,000.00

National	Endurance NZ	To assist with the costs of funding the NZ Marist 7s coaching school	\$ 5,000.00
National	New Zealand Marist Rugby Football Federation Inc	Playing and training uniforms, basketballs, coaching and training equipment	\$ 6,051.00
National	NZ Deaf Basketball Inc	Operating costs 1 to 18 as per resolution	\$ 500,000.00
National	Asthma And Respiratory Foundation of NZ Inc	2014/15 Community education plan	\$ 500,000.00
National	Diabetes Nz Inc	Clinical leadership programme	\$ 50,000.00
National	Parkinsonism Society Of Nz Inc	Activities related to raising awareness of dementia, capability development, information resources and member support	\$ 497,838.00
National	Alzheimers NZ Inc	Registration costs to attend the National Training Seminar	\$ 2,347.82
National	Pregnancy Help Inc National	Course costs for students attending Outward Bound courses	\$ 300,000.00
National	Outward Bound Trust Of Nz	Costs to source train assess and place a hearing dog with a deaf or hearing Impaired NZ	\$ 30,000.00
National	Hearing Dogs For Deaf People NZ	Web hosting costs	\$ 5,848.00
National	NZ Organisation for Rare Disorders	Costs of a conference phone	\$ 1,695.10
National	Eventing NZ	Medical cover	\$ 3,317.23
		50	\$ 3,840,419.07



Te Ope Whakaora

**The Salvation Army Wellington Addiction Services – Gambling
(Oasis Centre)**

Submission to
Wellington City Council Review 2015

Of the
2010 Gambling Venues Policy and Proposed New Policy

The Salvation Army's Wellington Addiction Services (Oasis Centre) welcome the opportunity to make Oral Submissions

Please contact

Vicki Hirini
Public Health Worker
Ph. 04 389 6566
Mob. 0272230375
Vicki_Hirini@nzf.salvationarmy.org

Background

The Salvation Army is an international Christian and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and faith-based services, particularly for those who are suffering, facing injustice or those who have been forgotten and marginalised by mainstream society.

The Salvation Army Oasis Centre for Problem Gambling was formerly established in June 1997 in response to the growing evidence that the considerable influx of gambling opportunities were having a negative social impact on society. Previous to the Auckland Oasis Centre's establishment in 1997, gambling counselling had been provided in Wellington and Christchurch when needed for some years. Since then the numbers of clients seeking help for gambling related problems have increased dramatically. Consequently The Army's problem gambling services have expanded to six regions (Auckland, Waikato, Tauranga, Wellington, Christchurch and Dunedin), with satellite clinics across the country. We are funded by the Ministry of Health to provide problem gambling clinical and public health services.

The Salvation Army Addiction Services – Gambling (Oasis Centres) offer free outpatient service for gamblers, their families and affected others, alongside public health services, and are staffed by qualified and experienced clinical and public health practitioners. The Army also has a national addictions leadership team supported by the larger Salvation Army administrative infrastructure.

This submission has been prepared by the Wellington Addiction Services – Gambling (Oasis Centre) with the support of the Social Policy and Parliamentary Unit. The Social Policy Unit works towards the eradication of poverty in New Zealand by encouraging policies and practices that strengthen the social framework.

General comments

Gambling Causes Harm in our Communities

As a provider of services to those with addiction issues, The Salvation Army Wellington Oasis Centre sees the detrimental effects that problem gambling has on whanau and communities around New Zealand. We see first-hand significant harm to the wellbeing of whanau and communities. Significant harms are caused in relationships, mental health and wellbeing and unsustainable levels of debt. There are links between problem gambling and domestic violence and a correlation between child neglect and abuse^{1,2}. In relation to crime in our communities, one in every four male prisoners and one in every three female prisoners are likely to have a problem with gambling². In addition, KPMG's Fraud Survey of New Zealand and Australia found that gambling was the most common motivator of fraud – with the average value of \$1.1 million per incident³.

The Salvation Army Wellington Oasis Centre believes the siting of most pokie venues in the most vulnerable neighbourhoods is a social injustice.

Gambling in Wellington

In the last twelve months the people of Wellington City have lost **\$36.25 million** on Electronic Gaming Machines (EGMs).

There are **679 EGMs** and **44 venues** in Wellington City Council's area.

The Salvation Army Wellington Oasis Centre supports a Sinking Lid Policy

Williams and Simpson⁴ propose a number of practices to minimise and prevent problem gambling. The most effective and successful strategy they cite in their research is – **Limit the access to pokie/electronic gambling machines.**

We submit that the easiest way Wellington City Council can protect vulnerable and at risk members of our communities, is to adopt a Sinking Lid Policy. Other City and District Councils who have acknowledged the harm pokies cause and adopted a Sinking Lid Policy include; Far North, Kaipara, Whangarei, **Auckland Council**, Waikato District Council, Otarahanga, **Hamilton**, South Waikato, Thames/Coromandel, Gisborne, Kawerau, Wairoa, Whanganui, Hastings, Horowhenua, **Christchurch City Council**, Gore and Invercargill.

Feedback on proposed policy

Overall The Salvation Army Wellington Oasis Centre **opposes** the proposed gambling venues policy 2015. We encourage the Council to be more proactive in reducing gambling harm by adopting a Sinking Lid Policy for Wellington City.

1. *Continue to place maximum limits on the number of machines in most geographic areas. As with the existing policy, no limit would apply in the central city area.*

The Salvation Army Wellington Oasis Centre does not support this aspect of the policy. We submit that Wellington Central Business District (CBD) should have restrictions on Electronic Gambling Machines (EGMs):

As stated on the Wellington City Council website, Wellington is New Zealand's Centre of government and the world's southernmost capital city. It is also the country's cultural capital, third most populous urban area in New Zealand and home to many museums, theatres and arts festivals. It is submitted that Wellington central should not have unrestricted EGMs.

Given the availability of EGMs in central Wellington, workers who come into the CBD are at higher risk of problem gambling in their working environments. Visitors who come into the CBD are subject to a higher number of EGMs. We want our CBD to be the cultural capital of New Zealand, we do not believe EGMs enhance our culture. We believe that any increase in EGM availability could lead to increased levels of gambling harm for Wellington City.

2. *Lower the maximum limits that were established in the 2010 Policy so that no more than two further venues can be established in any zone. In practice this means the new limits would be the lesser of:*
 - *the existing number of NCGMs in an area plus 18;*
 - or*
 - *the current cap.*

While we support limiting the number of EGM venues in Wellington City, we do not support this aspect of the proposed policy overall. The Salvation Army Wellington Oasis Centre would like to see a Sinking Lid Policy in place which would mean no further venues in any zone within the city. This would reduce the number of EGM venues slowly, over a period of time, whereas the current proposed policy does not reduce current numbers at all.

3. *Allow venues to relocate and take their existing entitlement of machines with them, but only provided:*
 - *they relocate to or within the central zone; or*
 - *they relocate to or within an area identified as a "centre" in the Wellington District Plan; and*
 - *the NCGMs at the new venue would not mean that any zone would be above its limit of machines.*

The Salvation Army Wellington Oasis Centre opposes venue transfers. We encourage the Council to adopt a Sinking Lid Policy, with no relocations.

We are not in favour of one venue transferring their *full quota* of Electronic Gambling Machines to a new venue if they want to relocate.

We find many venues are just outside, or on the margins of vulnerable communities and have been there for some time. Should relocations be allowed, we suggest the Council only allow venues to transfer a *reduced* number of EGMs to new venues. This reduction is much healthier as it reduces the total amount of EGMs for the whole community.

4. *Remove the requirement that only premises with an alcohol on-licence can be NCGM venues, but only where any NCGM venues without an onlicence are located in "centres" identified in the Wellington District Plan.*

The Council should not remove the requirement that only premises with an alcohol on-licence can be NCGM venues.

The Gambling Act 2003 stipulates that gambling cannot be the primary business of the premises, and also requires that people under the age of 18 must not be allowed to participate in Class 4 gambling. While we agree that siting (EGMs) in licensed premises is not ideal, the intention was to protect young people.

To argue that we need to widen the availability of Electronic Gaming Machines to additional venues which are not age restricted, is a dangerous move and would serve to normalise gambling. This policy would make EGMs available in venues where younger (and much more vulnerable) people gather. Gambling harm seen in younger people is usually much harder to deal with, and because it occurs at a critical time in their development, can impact hugely in their whole of life outcomes⁵.

5. *Retain the existing policy on Racing Board venues, meaning they may be established anywhere in the Wellington District, subject to the provisions of the Wellington City District Plan.*

The Salvation Army Wellington Oasis Centre submits that there should be a limit on the number of Racing Board venues in the Wellington District. We submit that the Wellington City Council needs to adopt the Sinking Lid Policy in all areas of the city.

Conclusion

We submit that the primary way that Wellington City Council can reduce gambling harm in the community of Wellington is by regulating and limiting the use of Class 4 gaming machines.

We submit that the Wellington City Council needs to adopt the Sinking Lid Policy in all areas of the city.

Notes

1. Shaw M., Forbush, K., Schlinder, J., Rosenman, E. & Black, D. (2007). The effect of pathological gambling on families, marriages and children. *CNS Spectrums* 12(8).
2. Centre for Social and Health Outcomes Research and Evaluation and Te Ropu Whariki (2008) *Assessment of the Social Impacts of Gambling in New Zealand*. Wellington: Ministry of Health.
3. KPMG (2009), Fraud Survey 2008
4. Williams, R. J. & Simpson, R. I. (2008). *Promising Practices in the Prevention of Problem Gambling*. Report prepared for the Ontario Problem Gambling Research Centre. Guelph, Ontario, Canada
5. Rossen, F., Butler, R. & Denny, S. (2011). *An exploration of youth participation in gambling and the impact of problem gambling on young people in New Zealand*. Centre for Gambling Studies, Prepared for the Ministry of Health. Auckland UniServices Limited, The University of Auckland

Please enter your contact details below. They will be used by Wellington City Council staff for purposes relating to this item of business only, including contacting those who have asked to appear before the committee. Required fields are marked with an *.

Contact name* SHEILA REED And House
 Address* PO Box 11-108, Mairangi St Wgtn 6142; 138-140 Wakefield St Wellington
 Phone* 499-6646 Email ean.wgtn@acwellington.org.nz
 If representing an organisation: Organisation name Age Concern
 Position/title Elder Abuse & Neglect Prevention Co-ordinator

Tick this box if you are willing to appear before Wellington City Council to give an oral submission.

Please note all submissions (including personal details of submitters – name, address and phone numbers) will be public documents.

1. In these areas of Wellington, I would like there to be... (tick one box per row)

	More pokies	The same amount of pokies	Fewer pokies
Southern Ward (97)			<input checked="" type="checkbox"/>
Northern Ward (126)			<input checked="" type="checkbox"/>
Eastern Ward (113)			<input checked="" type="checkbox"/>
Onslow Ward (0)			<input checked="" type="checkbox"/>
Western Ward (35)			<input checked="" type="checkbox"/>
Lambton (6)			<input checked="" type="checkbox"/>
Central Area Zone (476)			<input checked="" type="checkbox"/>

(Note: numbers in parentheses are current amount of pokies in each ward.)

2. A 'sinking lid' policy sees venue numbers decrease; after a venue closes, the number of allowed venues decreases by one, reducing pokie numbers over time.

I support / do not support this policy.

3. The Council is proposing to remove the requirement for venues to have liquor licenses.

I support / do not support this option.

4. The Council is proposing to continue to allow TAB venues to establish anywhere within Wellington.

I support / do not support this option.

5. I would like to add...

I see many cases where elderly people are harmed by the gambling addiction of family members. The need of the addict for money is so great that they often then financially abuse their parents causing distress to the superannuitant

(More space on the opposite page)

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**The Review of the Gambling Venues
Policy 2010: submission form**

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Item 2.1 Attachment 2

Section one - details for the submission form

Enter your name and contact details

Mr Mrs Ms Miss Dr

First name* Last name

Street address*

Phone/mobile Email

* Mandatory fields

I am making a submission As an individual On behalf of an organisation I would like to make an oral submission

Name of organisation

We are keen to get your views on the Wellington City Council Gambling Venues Policy.

You can have your say:

- submitting online at Wellington.govt.nz,
- emailing a submission policy.submission@wcc.govt.nz
- complete this form, detach and post back to us (no postage required)
- phoning us on 04 499 4444
- requesting an opportunity to make an oral submission.

Submissions close at 5pm, Friday 22 May 2015.

Disclaimer:
All submissions (including name and contact details) are published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

Section two - questions

Question 1: Do you agree with the proposed changes in the draft policy?

The proposed changes include

- Continuing to place maximum limits on the number of machines in most geographic areas. As with the existing policy, no limit would apply in the central city area. Yes No
- Lower the maximum limits that were established in the 2010 Policy so that no more than two further venues can be established in any zone. In practice this means the new limits would be the lesser of:
 - the existing number of NCGMs in an area plus 18; or
 - the current cap. Yes No
- Allow venues to relocate and take their existing entitlement of machines with them, but only provided:
 - they relocate to or within the central zone; or
 - they relocate to or within an area identified as a "centre" in the Wellington District Plan; and
 - the NCGMs at the new venue would not mean that any zone would be above its limit of machines. Yes No
- Remove the requirement that only premises with an alcohol on-licence can be NCGM venues, but only where any NCGM venues without an on-licence are located in "centres" identified in the Wellington District Plan. Yes No
- Retain the existing policy on Racing Board venues, meaning they may be established anywhere in the Wellington District, subject to the provisions of the Wellington City District Plan. Yes No

Question 2: If you disagree with any of the proposed changes in Question 1, can you provide additional information on your position?

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Question 3: Do you have any other suggestions or feedback?

YES - see attached comments

Thank you for your comments. Please return this submission form by 5pm 22 May 2015.

1st fold here - fasten here once folded

**Please return this submission form
by 5pm 22 May 2015.**

2nd fold here

Free Post Authority Number 2199

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

CARRIED BY NEW ZEALAND POST 410-07 20 MAY 2015

>>> FROM WELLINGTON, NEW ZEALAND >>>



FreePost Wellington City Council
Proposal: Review of the 2010 Gambling Venues Policy (COP01)
Wellington City Council
PO Box 2199
Wellington 6140

My Notes : Additional submissions :

- ① I'm delighted that expenditure on Polies is dropping, but suspect its going to lotto.
- ② This legislation is another example of a NASTY NATIONAL COURT who dump problems on society and local Bodies.
- ③ However WCC must continue with its smiling lid policy on Polie machines, and in fact make it tighter.
Take the polie Machines out of the Suburbs & put them all in the CBD.
- ④ I think the 3 big polie owing societies are thieves. They are super rich & inward looking. I think 80% of revenue from Polies should go back to the community rather than the 42% now. I watch parliament when the Act was debated & the National Court speakers were ~~dismissing~~ ^{terrible} crooks.
- ⑤ Did you know that the majority of money from polies is gained in the POOR areas of society yet then go

for funding of sports projects in the
Rich areas of Society. eg. Newtown Police
revenue funds Karori sports fields!

(6) If you look at the so called charities
who operate the police revenue you
can see most of the funds are
paid out to

a) Sports

b) Rugby sports

c) Men sports

throughout NZ.

(7) Take the Police machines away from the
Booze licence areas. When people drink
then they gamble on police etc.

(8) Increase the application fee to \$1000.00

(9) If Wadestown Ngāio (etc) (the Rich does)
arent DEPRIVATED (pg 10) well lets help them out
by sending all the police machines to their
area!

(10) Anyway, at the end of the day
I will go along with what ever
Council Officers propose, because they
run the city, & dont need ratepayer
opinion.