



Submission on the Gambling Venues Policy

Dear City Councilors,

I urge you to take the strongest action possible to reduce gambling harm: Option A, a sinking lid.

- Please ensure that pokies in TABs *are* included in the sinking lid.
- Mergers and relocations of Class 4 venues should *not* be allowed, in order that pokies are phased out as soon as possible.

Pokies have no place in a fair city. These are machines that are designed to addict, and which are placed predominantly in lower income neighbourhoods. The only ethical approach is to phase them out as soon as possible.

It is tragic that community funding has become dependent on problem gambling. What a mess this has created. The essential work of community groups should not rely on the continuation of gambling harm. Efforts to reduce harm should not be seen as an attack on the community sector, drawing group after group to oppose them. How have we gotten here?! This funding model must change.

Please see this system for what it is – regressive, exploitative and intractable without wise leadership – and please use your power to dismantle it. Implement a sinking lid as one step to reduce harm and to start the transition to a fairer funding model.

I would like to make an oral submission.

Kind regards,

Kate Day

Anglican Advocacy



CRICKET WELLINGTON INC.

CREATING OUTSTANDING CRICKET EXPERIENCES FOR THE PEOPLE OF WELLINGTON

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand

To whom it may concern,

Subject: Wellington City Council - Gambling Venues Policy: Statement of Proposal

Cricket Wellington's Position: In support of Option C: No Change to current policy

OVERVIEW:

What do you think about when you think of summer in New Zealand? Days at the beach, Tip Top ice-cream, BBQ's and potentially the sound of cheers from a six hit in backyard cricket or a great catch taken from a classic game of beach cricket? It is almost undeniable that summer elicits emotional connections to New Zealand's number one summer sport: cricket! From the beach to the backyard to the Basin Reserve; cricket continues to grow in popularity, and it is our responsibility to ensure the game, and sport in general, remains accessible and affordable for all.

Cricket Wellington is the regional sports organisation for cricket in the greater Wellington region. We are tasked with creating outstanding cricket experiences for Wellingtonians, and we are proud to do so. Our clubs, our participants, our volunteers all rely on Cricket Wellington to administer the game and we, like our clubs, rely heavily on gaming funding to safeguard the future survival of cricket in our region.

There are currently 22 affiliated cricket clubs in the Wellington region with over 8,500 active participants, 200 umpires, 435 registered coaches and numerous volunteers forming the backbone of our vibrant cricketing community. The Wellington City Council is the local territorial representative for Cricket Wellington and 9 of our affiliated clubs as highlighted below:

Brooklyn Cricket Club	Eastern Suburbs Cricket Club
Johnsonville Cricket Club	Karori Cricket Club
North City Cricket Club	Onslow Cricket Club
Victoria University Cricket Club	Wellington Collegians
Wellington Indian Sports Club	

Cricket Wellington and our member clubs are focussed on getting more people playing and loving cricket. We are driven to create a vibrant, integrated and participant focussed environment that inspires. During the 2019-20 season, we;

- delivered our school awareness, Yeah! Girls and School Yard Smash programmes to 20,687 Tamariki and Rangatahi across 128 schools
- developed and supported 95% of junior and youth team coaches through our coach education programme
- increased the number of games covered by umpires by 10%



CRICKET WELLINGTON INC.

CREATING OUTSTANDING CRICKET EXPERIENCES FOR THE PEOPLE OF WELLINGTON

- grew male and female participation by 9.3% with the highlight statistic being an 11% growth in college cricket teams, including the establishment of cricket teams at Aotea College and Wainui High School for the first time in six years

As measured by our voice of participant survey (which we conduct annually at the end of each season), overall member satisfaction is improving. What was identified from the feedback, is that to enhance satisfaction, our participants would like to see the quality of facilities that they play on improved and this requires significant financial investment.

Cricket Wellington receives 40% of our annual income from gaming trust funding. These grants directly fund the administration and delivery of community cricket in Wellington, including \$73,000 on average per annum to pay for Wellington City Council Ground Fees. If there was an inability to access money generated via gaming machines, then the sustainability of cricket in Wellington would be seriously jeopardised and we would be forced to introduce a user pays system and increase affiliation fees, which will undoubtedly make the game too expensive to play and administer for the majority of our participants, facility users and clubs.

Our clubs also access funding for various projects, initiatives, and programmes to support costs associated to cricket which include balls, equipment, apparel, facility hire, ground hire, delivery programmes and coaching. Grant funding obtained by clubs equated to \$738,831 in 2019-20, with \$289,278 received by clubs within the Wellington City Council region. There is no denying that this money is critical in supporting the survival and sustainability of club cricket in Wellington.

The Wellington Regional Sport and Active Recreation Strategy highlights how important regular participation in sport and recreation is for the physical, mental, and social wellbeing in the community. This is more critical than ever as the financial impact of COVID-19 will have varying effects on our communities and will see the accessibility of sport become increasingly more difficult. This again highlights the support required from gaming funds to ensure that sport remains a vehicle for physical health and wellbeing.

Our ability to service the game and our community cannot be achieved without the substantial amount of grant funding that our sport receives. We have a responsibility as supporters, fans, participants, administrators, partners and ultimately as guardians of the game, to protect the future of not only active participation in cricket, but in all sport. Therefore, Cricket Wellington is supportive of Option C – for there to be no change to the existing Wellington City Council Gambling Venues Policy.

The funding we receive from gaming grants creates real value for our entire cricket community in Wellington as highlighted below:

- \$440k annually – funding of community cricket delivery and administration support
- \$73k annually – funding of ground fees in Wellington and paid to Wellington City Council
- \$45k annually – funding of facility hire for community cricket
- \$40k annually – funding of facility upgrades for Health and Safety purposes

A reduction in funding would cripple our ability to deliver cricket in our community including participant development and engagement opportunities through our delivery programmes for our Tamariki and Rangatahi, coach development and education, umpire training, volunteer support, facility quality and access, and administration support for clubs.



CRICKET WELLINGTON INC.

CREATING OUTSTANDING CRICKET EXPERIENCES FOR THE PEOPLE OF WELLINGTON

SUMMARY:

- Cricket Wellington is advocating for Option C: No change to current policy
- Support Letters from affiliated Cricket Wellington clubs are attached
- We will take the opportunity to speak to this submission

The time for change is not now. We need financial support more than ever and we need funding to be sustainable so that we can continue to deliver outstanding cricket experiences for the people of Wellington. We need the ongoing backing from Wellington City Council to protect the funding we so desperately require.

Kind Regards,

Cam Mitchell [CEO]

Cricket Wellington

Liz Green [General Manager]

Cricket Wellington



24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Eastern Suburbs Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Eastern Suburbs Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

The Eastern Suburbs Cricket Club is represented by the Wellington City Council as our local territorial authority and in 2019-20, 34% of the overall club income was generated through gaming funds. The impact that class 4 funding has on our organisation is considerable, and without it the ability to service our participants, coaches and volunteers would be significantly inhibited.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. We work hard to diversify income every year, but it is a challenge to generate sponsorship and fundraising money, and as the financial effects of Covid-19 are realised, we are acutely aware that accessing funding from alternative sources will become increasingly difficult and unfeasible.

Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

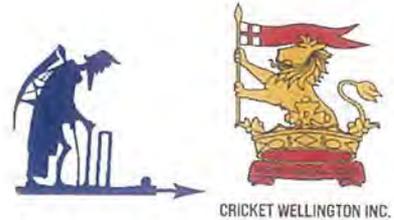
Regards,

Gordon Dry
Eastern Suburbs Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140 New Zealand

Subject: Wellington City Council – Gambling Venues Policy Letter of Support:



CLUB:	Hutt District Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Hutt District Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink, appearing to read 'Campbell Mackie', written in a cursive style.

Campbell Mackie

Hutt District Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Johnsonville Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Johnsonville Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

The Johnsonville Cricket Club is represented by the Wellington City Council as our local territorial authority and in 2019-20, 44% of the overall club income was generated through gaming funds. The impact that class 4 funding has on our organisation is considerable, and without it the ability to service our participants, coaches and volunteers would be significantly inhibited.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. We work hard to diversify income every year, but it is a challenge to generate sponsorship and fundraising money, and as the financial effects of Covid-19 are realised, we are acutely aware that accessing funding from alternative sources will become increasingly difficult and unfeasible.

Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink that reads 'Rick Mudgway'.

Rick Mudgway
Johnsonville Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand

Junior Cricket
Upper Hutt



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Junior Cricket Upper Hutt
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Junior Cricket Upper Hutt, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

Malcolm Benge
Junior Cricket Upper Hutt

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Naenae Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Naenae Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in blue ink, appearing to read 'Brent Wenlock'.

Brent Wenlock
Naenae Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Northern Park Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Northern Park Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink, appearing to read 'Iain MacIntyre'.

Iain MacIntyre
Northern Park Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



CRICKET WELLINGTON INC.

Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Petone Riverside Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Petone Riverside Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink, appearing to read "Allan Hewson".

Allan Hewson
Petone Riverside Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Porirua City Junior Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Porirua City Junior Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink that reads 'Rochelle Roddick'.

Rochelle Roddick
Porirua City Junior Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Stokes Valley Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Stokes Valley Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

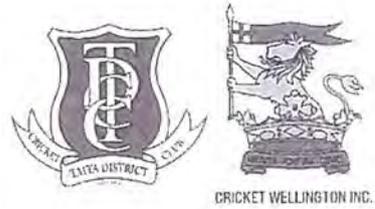
Regards,

A handwritten signature in black ink, appearing to read 'Brendon Wood', written in a cursive style.

Brendon Wood
Stokes Valley Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Taita Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Taita Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink, appearing to read "Dave Gillespie".

Dave Gillespie
Taita Cricket Club

30/9/20

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Upper Hutt United Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Upper Hutt United Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink, appearing to read "Dan Henderson", written over a white background.

Dan Henderson
Upper Hutt United Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Victoria University Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Victoria University Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

The Victoria University Cricket Club is represented by the Wellington City Council as our local territorial authority and in 2019-20, 60% of the overall club income was generated through gaming funds. The impact that class 4 funding has on our organisation is considerable, and without it the ability to service our participants, coaches and volunteers would be significantly inhibited.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. We work hard to diversify income every year, but it is a challenge to generate sponsorship and fundraising money, and as the financial effects of Covid-19 are realised, we are acutely aware that accessing funding from alternative sources will become increasingly difficult and unfeasible.

Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in blue ink, appearing to read "Colin Owens".

Colin Owens
Victoria University Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Wainuiomata Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Wainuiomata Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

We are part of the wider cricket community in the Wellington region, and although the Statement of Proposal for the Gambling Venues Policy by Wellington City Council does not directly influence our club, we want to provide our support for Cricket Wellington and affiliated clubs within the Wellington City Council boundary.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. Importantly, we require funding to remain sustainable as a club and we are acutely aware that all clubs in Wellington are reliant on gaming funding for similar reasons as outlined above. We are concerned that without this income avenue for clubs within the Wellington City Council boundary, the future sustainability of clubs will be at risk. We need all clubs to survive, now more than ever.

Additionally, Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink that reads "Justin Morgan".

Justin Morgan
Wainuiomata Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



CRICKET WELLINGTON INC.

Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Wellington Collegians Cricket Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Wellington Collegians Cricket Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

The Wellington Collegians Cricket Club is represented by the Wellington City Council as our local territorial authority and in 2019-20, 14% of the overall club income was generated through gaming funds. The impact that class 4 funding has on our organisation is considerable, and without it the ability to service our participants, coaches and volunteers would be significantly inhibited.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to fund affiliation fees, purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. We work hard to diversify income every year, but it is a challenge to generate sponsorship and fundraising money, and as the financial effects of Covid-19 are realised, we are acutely aware that accessing funding from alternative sources will become increasingly difficult and unfeasible.

Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in blue ink, appearing to read "Scott Ryland", with a long horizontal flourish extending to the right.

Scott Ryland
Wellington Collegians Cricket Club

24 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand



Subject: Wellington City Council – Gambling Venues Policy

Letter of Support:

CLUB:	Wellington Indian Sports Club
AFFILIATION:	Cricket Wellington
OPTION:	Support Option C

On behalf of the Wellington Indian Sports Club, we endorse Cricket Wellington's submission supporting Option C: No change to current policy.

Various community organisations and clubs have traditionally been dependent on gaming funding, and although reliance on funding is volatile, there is a real absence of other feasible options that will regularly provide income for clubs, like ourselves, to help with costs associated with running a sustainable cricket club. Gaming funding aids our ability to purchase cricket balls, cricket equipment, apparel, and to support various club initiatives targeting participation. We work hard to diversify income every year, but it is a challenge to generate sponsorship and fundraising money, and as the financial effects of Covid-19 are realised, we are acutely aware that accessing funding from alternative sources will become increasingly difficult and unfeasible.

Cricket Wellington is a significant supporter of cricket clubs in Wellington and is responsible for various community initiatives that directly benefit clubs. We understand that changes made to the Wellington City Council Gambling Venues Policy will have a direct impact on their ability to generate income and therefore support clubs, like ourselves.

We stand behind Cricket Wellington and support the collective club position in support of Option C.

Regards,

A handwritten signature in black ink, appearing to read 'Ashwin Patel'.

Ashwin Patel
Wellington Indian Sports Club



Wellington City Gambling Venue Policy – One Foundation Submission

Summary

One Foundation Limited is a gaming society that has five gaming venues in Wellington City:

- Clockworks, 191 Main Road, Wellington.
- Duke of Wellington, 29 Waterloo Quay, Wellington.
- Fringe Bar, 26-32 Allen Street, Wellington.
- Local Bar, 3-5 Strathmore Avenue, Wellington.
- The Office Café & Bar, 124 Riddiford Street, Wellington.

One Foundation asks that Council:

- Retains the current ward-based caps (the introduction of a sinking lid is opposed).
- Expands the relocation provision to enable venues within the CBD to move to another, more suitable location, within the CBD.

Grant Funding

Non-casino gaming machines are the largest funders of Wellington-based grassroots organisations. The funding (including the non-published funding used by clubs) is over \$3.6 million to organisation within Wellington City annually; and over \$61 million to organisations within the Wellington region annually.

No alternative funding is available.

Harm Minimisation Measures

When making a decision regarding what restrictions Council should impose (if any), regard must be had to the considerable number of harm minimisation measures that are already in place.

One Foundation operates its gaming machines in a responsible manner. Access is limited to persons aged 18 years and over and steps are taken to prevent problem gambling at the venue.

The machines have limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is \$2.50. The maximum prize for a non-jackpot machine is \$500.00. The maximum prize for a jackpot-linked machine is \$1,000.00.

The machines have a feature that interrupts play and displays a pop-up message. The pop-up message informs the player of the duration of the player's session, the amount spent and the amount won or lost. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.

The machines do not accept banknotes above \$20.00 in denomination.

ATMs are not located in the gaming rooms.

All of our venues have a comprehensive written harm minimisation policy in place.

As part of the monitoring of the gaming room venue, staff are required to enter data in a control sheet every half an hour. The control sheet details the number of players on each machine and whether they are male or female. This process ensures that the staff are regularly monitoring the gaming room and keeping a record of the persons playing. This process helps staff to identify any person who may be subject to an exclusion order. The process also helps to identify any person who may need to be approached due to an extended session of play.

Date: 1, 11, 17

Staff Initial	JAN 1	JAN 2	JAN 3	JAN 4	JAN 5	JAN 6	JAN 7	JAN 8	JAN 9	JAN 10	JAN 11	JAN 12	JAN 13	JAN 14	JAN 15	JAN 16	JAN 17	JAN 18
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HAVE YOU CHECKED ALL YOUR VENUE'S EXCLUSION ORDERS? STONE SIGN - TENDS TO BORROW MONEY FROM CUSTOMERS OR STAFF

Staff Member Name: Vicki, Alice, Sebina

Our venues use the Health Promotion Agency's gambling harm reference cards. These cards detail the general and strong signs of problem gambling and outline what our staff should do when the signs are observed.

Contents of this Book

1. HPA Gambling Harm Reference Cards
2. Daily Gaming Room Control sheets x 31
3. Daily Incident Observation Register sheets x 31
4. Exclusion Orders (multi use for MVE's, Self and Venue Initiated) x 6
5. Extra Daily Incident and Observation Register sheets x 6

Use of this book will assist your venue fulfil your obligations under the Gambling Act 2003 and associated regulations. Most importantly Harm Minimisation and Problem Gambling.

Be a responsible host. Get to know the guests using the gaming machines and look for signs that change such as spending more, playing for longer.

Make sure you always have Problem Gambling advice on hand such as the "Spending HPA's" cards and the HPA "Spending more on the pokies than you wanted?"

GAMBLING HELPLINE 0800 654 655

Other First Sovereign Trust Limited Manuals

- Harm Minimisation Manual
- Armed Robbery Safety Kit

Gambling Harm Reference Card

General Signs	What to do
Length of play <ul style="list-style-type: none"> • Excessive play for an individual (e.g. 12 hours) • Excessive time spent • Plays for long periods of time Social behaviour <ul style="list-style-type: none"> • Becomes angry if he/she loses (or other players) • Blame someone else for their loss • Complaints about other players Money <ul style="list-style-type: none"> • Plays long sessions (e.g. 12 hours) in one session • Plays for long periods of time • Plays for long periods of time • Excessive time spent Behaviour during play <ul style="list-style-type: none"> • Talks to other people while playing 	If you see any of these General Signs in a gambler, you should gently check in on that person. <ul style="list-style-type: none"> • If you have reason to believe a gambler is a problem gambler, you should approach them and offer them support.
Strong Signs	What to do
<ul style="list-style-type: none"> • Excessive play for an individual (e.g. 12 hours) • Excessive time spent 	If you see any of these Strong Signs in a gambler, decide which staff member is best to approach them. That staff member should: <ul style="list-style-type: none"> • Approach the gambler calmly and discreetly • Provide them with a brief introduction about what you can offer • Offer them support to contact a gambling helpline or other support • Offer them support to contact a gambling helpline or other support

health promotion agency | INTERNAL AFFAIRS | CHOICE OF CHANGE

All our venue staff undertake comprehensive problem gambling awareness and intervention training. Refresher training is provided on a 12-monthly basis.

In addition to the above we will also keep a daily incident and observation register. Any incident that gives rise to potential concern is recorded in the register. If multiple minor

incidents are noted, the venue manager is required to approach the player and provide information and advice. The register is also a great way for the staff to share their observations with other staff who are on different shifts.

The gaming room has pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.

Gambling Helpline
Free, confidential, 24/7
0800 654 655
Text: 0800
choice-notchance.org.nz

Free support
Gambling support services have qualified and professional staff who understand harms from gambling and can help – without judging. Make an appointment to meet with someone who can provide free and confidential support to both you and your family, to help you get things back on track. Call the Gambling Helpline on 0800 654 655 to be put in touch with a free service in your area.

Exclude yourself
Through a simple process called self-exclusion, you can choose to ban yourself from one or more pokie rooms that you visit regularly. This means these places will not let you gamble there for a period of time nominated by you. A period of six months to two years is recommended. A venue can also exclude you if they have ongoing concerns about your gambling. To find out more ask the venue staff or contact the Gambling Helpline on 0800 654 655.

Spending more on the pokies than you wanted?

Should I be concerned?
Do any of these sound familiar...
• Spending more time or money than you planned?
• Playing more to try to win back losses?
• Making excuses or hiding how much you play?
• Feeling guilty or worried about your gambling?
• Feeling sick to the pit of your stomach when you've finished playing?
If so, it's time to make some changes.

Can you beat the odds?
The odds are you will lose. Pokie machines are not designed to help players make money. They are meant to be a form of entertainment. You might sometimes have a win but, if you keep playing, you are likely to lose all the money you put in. One out of every three regular pokie players is likely to have a gambling problem.

How do pokies work?
A pokie machine is a computer designed to take in more money than it pays out – there is no skill or trick to cheat it. Each spin is random and will have an equal chance of winning as the last. It doesn't matter how long you sit at a machine or if it hasn't paid out in a while, you will probably lose. Games are designed to give free spins to make you think you are doing well so you keep playing. You should only gamble with as much as you can afford to lose.

Helpful tips
Here are some ideas to help keep things in check:
• Set a limit – only take the cash you can afford to lose.
• Leave the bank cards at home.
• Set up automatic payments for household bills.
• Take regular breaks to clear your head.
• Be honest with yourself and others about your gambling. Visit choice-notchance.org.nz for more tips and information.

Our gaming rooms have signage that encourages players to gamble only at levels they can afford. The signage also explains how to seek assistance for problem gambling. The signage is state-of-the-art electronic signage that includes the latest video clips from the *Choice Not Chance* campaign to end harmful gambling.



Video links: <https://youtu.be/r0d4AWfkBOE>
https://youtu.be/zrEkaQ_lfNo

<https://youtu.be/qXlob2UZPRg>
<https://youtu.be/7981oARw7B4>
<https://youtu.be/BAkNzYalx8I>

Any person who advises that they have a problem with their gambling is excluded from the venue. The exclusion is similar to a trespass order, in that it makes it illegal for the person to re-enter the gaming room for a set period of up to two years.

Our venue staff do not permit a player to play two gaming machines at once.

All our machines have a clock on the main screen. All the machines display the odds of winning.

A Concern with How Gamblers Spend their Disposable Income

The Salvation Army and Problem Gambling Foundation recently released a report commissioned from the New Zealand Institute of Economic Research suggesting that there would be significant economic benefit to the retail sector in both income and job creation if spending on gambling was halted. The report claims that this extra retail spending would generate an additional 1,127 full-time equivalent jobs for 1,724 workers, along with an additional \$58m of GST revenue and additional income tax of \$7m from the retail spend.

The report, however, fails to take into consideration the economic value currently generated by the gambling sector. The report specifically acknowledges that this was outside its scope. It is therefore a misrepresentation of the net value of such a move, given that it takes no account of the value that would be lost. What the Salvation Army and Problem Gambling Foundation appear to be saying is: let's take money – and jobs – away from the charity and not for profit sectors – health and rescue, education, community and social support services, environment, and arts and heritage – and give it to the commercial sector.

A suggestion is also made that the increased retail spending would then result in the retail sector channelling their increased profits into things like sports sponsorship. It is, however, more likely that any increased profits from the retail spending would be retained by the business owners, many of whom are large corporates, based offshore.

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

The "Costs of the System"

The Problem Gambling Foundation have also recently suggested that 60% of the revenue from gaming machines goes towards the costs of running the system (with the remaining 40% being the returns to the community). In fact, the community benefit is much more like 80%,

with the approximately 40% share that makes up the various taxes, duties and GST in effect also being a community contribution, going into the public purse to contribute to public good. The actual 'running of the system' is only about 20%. This 20% represents money to businesses – local hospitality businesses, trusts, equipment providers and technicians – and a significant number of jobs in our cities, towns and communities.

Evidence-Based Decision Making – Is a Sinking Lid Right for the Wellington City?

Gambling venue policy reviews are emotive reviews that attract a lot of interest from the public, and strong submissions organised by the problem gambling treatment providers. The treatment providers always advocate for a sinking lid policy, regardless of the level of gambling harm in the relevant city or district. One Foundation asks that council considers the evidence and makes an evidence-based, balanced decision having regard to what is right for Wellington City.

The Ministry of Health records the number of people who seek help for problem gambling from each territorial authority. This includes the people who use the helpline, text service, or obtain face-to-face counselling.

Compared with other cities of similar size, Wellington City has an extremely low problem gambling rate. In the year July 2017 to June 2018 (the most recent data available) 63 new persons from Wellington City sought help for problem gambling. Wellington has a population of 214,537 people. In contrast, in the same period, 103 new people from Hamilton City sought help for problem gambling. Hamilton has a population of 209,406.

Venue Relocation

Venue relocation is positive. The current relocation provision, however, prevents venues within the CBD relocating to another site within the CBD.

Venues within the CBD should be able to relocate when they are required to move due to circumstances outside their control such as lease expiry, public works acquisition, and site redevelopment. This is fair and reasonable.

The relocation provision should also allow CBD venues to move to buildings that have better earthquake ratings; to new, modern premises; and in cases where the landlord is imposing unreasonable terms.

Allowing venues to move out of earthquake-prone buildings is a matter of health and safety.

Permitting local businesses to relocate and upgrade their premises results in a more modern, attractive offering to the public. This helps to revitalise business districts, improves the local economy, and encourages tourism.

Currently, once a venue has obtained a licence to host gaming machines its value is artificially increased. This often leads to landlords demanding higher than normal rentals. The adoption

of an expanded relocation provision would prevent CBD landlords demanding unreasonable rentals, as it gives the venue operator the ability to relocate to an alternative venue.

Council is asked to adopt the following wording for the new relocation clause:

Venue Relocation

A new venue consent will be issued by Council in the following circumstances:

- (a) where the venue is intended to replace an existing venue within the district;
- (b) where the existing venue operator consents to the relocation; and
- (c) where the proposed new location meets all the other requirements in this policy.

In accordance with section 97A of the Gambling Act 2003, when a relocation consent is sought under this relocation provision, the new venue may operate up to the same number of machines that was permitted to operate at the old venue immediately before the old venue licence is cancelled as a result of the relocation.

In accordance with section 97A(c) of the Gambling Act 2003, when the new venue is established following a consent being granted under this relocation provision, the old venue is treated as if no class 4 venue licence was ever held for the venue. The old venue will therefore require a new territorial authority consent from Council before being relicensed to host gaming machines and will be limited to a maximum of 9 machines if such a consent is issued by Council.

Oral Hearing

I wish to make a presentation at the upcoming Council hearing.

Also please have regard to my written submission.

8 September 2020

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September 2020

Sport NZ Submission to Wellington City Council

GAMBLING VENUES POLICY – Statement of Proposal

Policy.submission@wcc.govt.nz

Introduction

1. Thank you for the opportunity to provide feedback on the Gambling Venues Policy – Statement of Proposal. This submission represents the view of Sport NZ – the Government Agency responsible for promoting and supporting quality experiences in play, active recreation and sport, to improve levels of physical activity and wellbeing for all New Zealanders.

The importance of Class 4 funding to community wellbeing

2. The proceeds from gambling represents the most critical source of funds for community sport and recreation, comprising approximately \$246m per annum (compared with \$23m from Government¹ in 2019/20). The proceeds from gambling comprises:
 - Class 4 - \$171m (via \$150m from pubs, \$20m from clubs and \$1m from TAB)
 - Lotto - \$65m (via \$55m from LGB profits and \$10m through LGB committees)
 - Sports betting - \$10.2m² (via commission payments to national sports organisations)
 - Casinos - \$0.5m (via sponsorships).
3. Returning funds to sport and recreation is an effective way for gambling agencies to demonstrate they are positively impacting New Zealand communities, (as is required under New Zealand's gambling regulatory regime). This includes improvements in the wellbeing of all New Zealanders.

There is no replacement fund

4. Class 4 funding is a critical source of funding to community organisations. It is accessible, widely distributed, and meets community demand in a timely manner.

¹ Rising to \$32m from 2022/23

² Anticipated to grow under current racing reforms

5. The disruption to this funding source during Covid-19 Alert Levels 3 and 4 (when funding halted) demonstrated how critical this funding is to the immediate and ongoing viability of community organisations.
6. Had the Government not provided immediate recovery support, many of these organisations would likely have been lost to the community.
7. There is no obvious alternative ongoing funding source to replace Class 4 gambling. While diversifying revenue streams is good practice, the reality is this is difficult to achieve for community entities, with limited commercial and philanthropic options in New Zealand.
8. The most obvious replacement source is increasing the cost to participants. As cost is a barrier to participation, this will simply contribute to sport and recreation being inaccessible to an increasing proportion of New Zealanders.
9. The only recent example of a critical funding source to sport and recreation being discontinued was the banning of sponsorship associated with smoking in the late 1990s. This did not have a significant impact as a new and larger source of funding became available at that time. That source of funding was Class 4.
10. Since its introduction in the 1990s, community organisations have become reliant on this source of funding. Any reduction of this funding will need to be carefully managed.

Sinking lid impact may be immediate

11. In its submission documentation WCC suggests the introduction of a sinking lid policy is a *long-term solution and provides plenty of time for (community) groups and the government to look at more ethical and sustainable funding arrangements.*
12. The introduction of a sinking lid policy may have a more immediate impact on funding to community groups than the above statement suggests.
13. A sinking lid policy means that when an existing Class 4 venue closes, consent for another to be established will not be given, and the funding from the machines from that venue will be lost.
14. The disruptions from Covid-19 have greatly increased the threat to the ongoing viability of a number of Class 4 venues. As such disruptions are anticipated to continue, we can expect an increase in the number of venues closing, the effect of which will be immediate on community organisations reliant on Class 4 funding.

Difficulty in legislating away gambling

15. Reducing harm from gambling has the right intentions. However, it is arguable whether reducing the number of machines will have an impact on problem gambling. Indeed, history has shown us that it is very difficult to legislate to reduce gambling.
16. While a balance needs to be struck between gambling and minimising gambling harm, the worst case scenario is that New Zealanders increase their gambling with offshore agencies – resulting in gambling harm and no benefit to New Zealand communities (including funding for harm minimisation initiatives). In 2019 offshore spend by New

Zealanders is estimated to be between \$253million and \$350million, and more than \$500million by 2021.³

17. Online gambling is becoming more accessible and attractive with advances in mobile technologies such as wireless Internet and cellular communications improvements. 5G wireless will soon become prevalent, which will enhance streaming speeds and the delivery of high definition visuals. It is also anticipated more online casino platforms will emerge, further driving improved player experience as a consequence of growing competition.
18. This suggests increasing numbers of people will gamble online. Indeed, the global online gambling market is expected to double in size over the next five years from the 2017 market capitalisation of \$73 billion to the 2024 market capitalization of \$150 billion⁴.
19. This is already being evidenced via betting with the NZ TAB. Fifty-two percent of bets in 2018 were conducted online. This percentage has been steadily increasing.

What a sinking lid policy is putting at risk

20. Nine out of 10 young people participate in sport and recreation, as do three out of four adults. 92% of New Zealanders believe that being physically active keeps people healthy and 89% agree that it relieves stress and is good for their mental health. Sport and recreation is also a means to connect communities and the sports industry contributes \$4.9b to the NZ economy.
21. Active recreation and sport activities play a significant part in people's lives in Wellington and the wider region.
22. Sport New Zealand's 2015 report on The Economic Value of Sport and Recreation to the Wellington Region identified the following:
 - Nearly 9 out of 10 (89.7 per cent) young people (5-17 years) in the region spend at least three hours per week in organised or informal sport and recreation activity.
 - Over 8 out of 10 (86.5 per cent) adults (18 years or older) take part in at least one sport or recreation activity (excluding walking and gardening) over a year.
 - These activities are supported by 115,000 volunteers.
 - Volunteers contributed 8.1 million hours to sport and recreation in 2013/14.
 - The estimated market value of these volunteered services is \$122.7 million at 2013 values.
 - Sport and recreation industries provide employment for people in the Wellington region
 - More than 4,000 people (4,311) work in sport and recreation industries
 - The sport and recreation sector (narrowly defined) is estimated to have contributed \$388.6 million to regional GDP in 2012/13, or 1.3 per cent.
 - Sport and recreation education is important in Wellington schools with just over five per cent of the National Curriculum being related to sport and recreation.

³ Datamine report

⁴ Statistica (2019)

23. A further Sport NZ study exploring the value of sport to New Zealanders, their communities and our country found that participation in active recreation and sport leads to:
- Happier, healthier people (both physically and mentally)
 - Better connected communities as a result of strengthened social and community networks
 - A stronger New Zealand – financially and through strengthened regional and national identity.

Preferred option

24. After consideration of the Statement of Proposal, Sport NZ's preferred option is Option C: No change to the current arrangements relating to machines and venues in Wellington.
25. We would welcome the opportunity to speak to this submission.

Ngā mihi

DAVE ADAMS

Head of Government Relations and Strategic Foresight

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sportnz.org.nz





Wellington City Council
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Gambling Venues Policy
PO Box 2199
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Email: policy.submission@wcc.govt.nz

Class 4 Gambling Venue Policy Review – Submission

Introduction

Grassroots Trust Central Limited (GTCL) is dedicated to providing local funding to local communities. GTCL is also very supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused from gambling. GTCL has reviewed the Wellington City Council's 2020 Statement of Proposal and The Social Impacts of Gambling in Wellington reports. GTCL responds to Wellington City Council's proposed changes below.

- GTCL **DOES NOT SUPPORT** Council's proposal and preferred option to implement a sinking lid policy (Option A), which allows no new venues or machines in Wellington.
- GTCL **DOES NOT SUPPORT** Council's proposal to lower the caps on the maximum number of machines by 87, align zone names to the 2019 Representation Review and reinstate the Primary Activities Clause (Option B).
- GTCL **SUPPORTS OPTION C** which would retain the current ward caps at the current number of gaming machines and venues but also **REQUESTS** Council consider supporting the expansion of provisions around their current relocation policy, allowing relocations of venues within the Wellington Central Area Zone.

Is the Wellington City Council's proposal fair?

There is no evidence to suggest that reducing venue and gaming machine numbers reduces gambling-related harm.

As council has mentioned in their Statement of Proposal, the total number of operating gaming machines and venues across New Zealand has continued to naturally decline. The same can also be said for Wellington City as a region, which has also continued to decline **without the need to implement a sinking lid policy**. Venue numbers in Wellington City have reduced by almost half (46%) between 2004 and 2019 reducing from 74 venues to 40 venues. Comparatively, the number of gaming machines also declined over the region by 39%, from 1024 gaming machines in 2019 to 626 gaming machines in 2019. These results remain comparable with other major New Zealand cities such as Auckland and Christchurch.

Secondly, not allowing venue relocations within the Wellington Central Area Zone is another attempt to reduce venue and gaming machine numbers and only entrenches venue operators in premises that may be a health and safety risk. Relocation provisions in a policy are good for any city, allowing venue operators to move out of earthquake prone, dangerous, and insanitary premises and into new venues that tend to be smaller, modern, and vibrant. Such relocations create a positive

entertainment precinct, support the local economy, and encourage tourism. Redevelopments of this nature are positive and should be encouraged.

Like many businesses, the Hospitality Industry has also been affected considerably by the worldwide COVID-19 pandemic. Almost overnight New Zealand's economy shut down with the country being sent into lockdown and having to endure social distancing restrictions. These restrictions resulted in temporary closure for many hospitality businesses for substantial periods of time and significantly limiting their operations, resulting in sharp declines in revenue.

The survival of businesses relies on the demand for product and supplies. Ensuring customers return, will rely on Hospitality operators doing the research to find out what makes customers feel safe in this new normal that is now faced around the COVID-19 pandemic. This research may include options to relocate their businesses to premises that encourage a positive entertainment area and also support the local economy and tourism.

Council also mentions that although machine and venue numbers continue to decline; gambling expenditure continues to rise. This could also be contributed to the fact that New Zealand's resident population has seen a dramatic increase from 4 million in 2003 to a little over 5 million in 2020, considered as possibly being the fastest growth seen in New Zealand History.

About GTCL

GTCL is a Class 4 Gaming Society licensed under The Gambling Act 2003 that generates funding for the community through the supply and operation of gaming machines in bars and pubs.

Operating from Hamilton, GTCL operates gaming machines at eleven Class 4 Venues across the Bay of Plenty, East Coast, Hawkes Bay, Manawatu and Wellington Regions.

The number of venues will increase over the next couple of months with three new venues also transferring their gaming operation to GTCL. GTCL operates gaming machines at two Class 4 Gaming Venues in Wellington City:

- Bay 66 Bar & Bistro - 18 Gaming Machines
- Newtown Sports Bar – 18 Gaming Machines

GTCL is governed by a professional Board of Directors consisting of Chairman, Sean Hannan; and Directors, Kath Grieve (Business Consultant); Mike Knobloch (Accountant); Andrew Lockyer (International Sales Executive) and Martin Bradley (former Lawyer).

Grant Funding

Class 4 Gaming Venues enable extremely valuable funding to be provided to a large range of local community groups. Approximately \$300 million in gaming machine funds is provided to over 11,000 community organisations each year across New Zealand. For the year ending December 2019, approximately \$16.3m (40% of Gaming Machine Proceeds) was returned in grant funding to the Wellington City region. Class 4 Gaming societies are the only gambling operators that focus on supporting grassroots community organisations. No other gambling provider provides this level of support for grassroots organisations. Grants make a positive difference to many community organisations, which would struggle to survive without this funding. There is no easy substitute for these funds.

Funding received by community organisations is critical to their ongoing sustainability. The Lottery Grants Board makes a small number of large grants to large organisations. The New Zealand Racing Board predominately uses the funds from race and sports betting to support the racing industry. The profits from the six commercial casinos are paid out to their commercial shareholders (save for a

token amount in community grants). No grant money is paid by offshore-based online gambling providers.

GTCL is required by law to return a minimum 40% of gross proceeds to authorised purposes and it is GTCL's intention to distribute these funds back to the community that it was generated, across the sport, community and education sectors. Our funding turnaround is quick, with grant decisions being made monthly.

Many organisations throughout New Zealand including the Wellington City region have benefited from a GTCL grant. For the period 1 July 2019 to 31 August 2020, GTCL made **\$397,980.42 in grants to sixty-three separate organisations who provide essential services to and within the Wellington City region** – see full list attached to this submission.

With the recent effects of COVID-19 being felt nationwide, the sustainability of our local community organisations has become even more imperative now. Community organisations have suffered significantly with the closure of Class 4 Gaming Venues during Levels 3 & 4, and the shortfall in funding has put their ability to continue providing their essential services at serious jeopardy. GTCL would like to highlight some community organisations within Wellington City that have benefited from funding from GTCL already:

 <p>Rongotai College & Wellington East Girls College</p> <p>Rongotai College is a boys secondary school in the south eastern suburb of Rongotai, and Wellington East Girls College is a girls secondary school which sits directly above Mount Victoria Tunnel.</p> <p>Both schools have a strong history of academic achievement and understand the importance of providing sporting opportunities for all students to promote and encourage fair play and good sportsmanship at all levels, as well as safe and effective curriculum-based teaching outside the classroom by way of school camps.</p> <p>GTCL shares this ethos, and recently showed their support by granting funding of over \$40,000 in the last 12 months by way of 33 individual grants toward sports equipment and school camp expenses</p>	 <p>Lyall Bay & Maranui Surf Life Saving Clubs</p> <p>We are a swimming nation. New Zealand boasts 15,000 km of coastline and 90% of us live within 40 minutes of a beach. But our glorious surf can be a deadly playground. Since 1910, ordinary Kiwis have volunteered their weekends to patrol our beaches saving thousands of lives and keeping people safe.</p> <p>Surf Lifeguards can be the difference between life and death and every volunteer Surf Lifeguard knows the powerful motivation of saving or protecting a life.</p> <p>GTCL understands the critical role that Surf Life Saving Clubs such as Lyall Bay & Maranui Surf Life Saving play within our communities and recently provided \$9,000 in funding toward critical safety equipment and essential operational expenses.</p>
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Malaghan Institute of Medical Research

The Malaghan Institute of Medical Research is New Zealand's world-leading independent biomedical research institute, harnessing the power of the immune system to improve human health.

GTCL supports good quality and often life changing medical research, and recently approved funding of \$10,000 towards purchasing a pharmaceutical refrigerator and scales.



Wellington Tennis Club Incorporated

Based in Newtown, Wellington Tennis Club's membership is made up of tennis players from Mt Victoria, Roseneath, Hataitai, Melrose, Newtown, Berhampore, Mt Cook, Te Aro and Central Wellington.

The Club recently developed three of their tennis courts and GTCL proudly supported this by granting \$6,000 to support this much needed project.

In 2012, Auckland Council commissioned a community funding survey. The survey data is summarised in the report *Community Funding: A Focus on Gaming Grants*.¹ The report confirms how essential gaming machine funding is to a very large number of grassroots organisations and how extremely difficult it would be for such funding to be obtained from alternative sources. The key findings of the survey are:

- Most respondents (75%) indicated that their organisation is moderately or totally reliant on gaming machine funding to fund core business activities.
- Most respondents (55%) believed that there would be a high to extreme risk to their organisation and their core business if they did not receive gaming funding. A further one-quarter (26%) said that there would be a moderate risk if they did not receive it.
- Two-thirds of respondents (68%) said that they thought that they would be unlikely to find another source of funding if gaming machine funding was not available.

Machine Numbers and Gambling Harm

There is no evidence to support the notion that taking Gaming Machines out of our communities will reduce problem gambling. In fact, the problem gambling rate in New Zealand continues to plateau, remaining low for the last 15 years. The New Zealand National Gambling Study: Wave 4 (2015)² found that problem gambling only affects 0.2% of New Zealand's adult population and this is despite a reduction of 10,000 gaming machines in the last 15 years. The Problem Gambling Rate is for all forms of gambling, not just gaming machine gambling.

¹ www.gamblinglaw.co.nz/download/Research/Auckland_City_Community_Funding_Report.pdf

² www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf

Ministry of Health figures show that 75% of adult New Zealanders regularly participate in gambling for entertainment, including Lotto, gaming machines, horse and dog racing, sports betting, and casinos. About 33% of those enjoy playing licensed gaming machines.

As reported by The Health and Lifestyles Survey 2016³, only 0.1% of gamblers (representing 6000 kiwis over the age of 18 years) are classified as problem gamblers. Comparing these figures to that of Wellington City as a percentage of the New Zealand population (4%) and the perspective of the problem in Wellington City emerges, showing that problem gambling in Wellington City is low. Also, worth noting is that The Health and Lifestyles Survey 2016 also showed that the most common forms of gambling in New Zealand is playing LOTTO, Instant Kiwi or participating in a raffle. During the period July 2017 to June 2018, there were 63 new problem gambling clients within Wellington City. For the same period, the total number of active problem gambling clients for Wellington City was 127.

On average, for every dollar that is played in a gaming machine, 91 cents of that dollar is paid out in prizes. This is the highest rate of return for any form of legal gambling in New Zealand. Reducing machine numbers has been tried as a tool to address gambling-related harm but it has not worked as there is no link between gaming machine numbers and harm caused. The graph below shows the dramatic reduction in gaming machine numbers over the last ten years and the corresponding flat problem gambling rate as reported by the last New Zealand National Gambling Study: Wave 4 (2015) prepared for the Ministry of Health:



Reducing venues and machine numbers merely reduces community funding and accelerates the migration of gambling to online providers where there is zero return to the community. There is no direct correlation between gaming machine numbers and problem gambling rates.

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

The 2012 National Gambling Survey concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report confirmed how essential gaming machine funding is to a very large number of community organisations and how

³ www.hpa.org.nz/research-library/research-publications/new-zealanders-participation-in-gambling-results-from-the-2016-health-and-lifestyles-survey

extremely difficult it would be for such funding to be obtained from alternative sources. The report stated on pages 17 and 18:

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

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

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

More Help Seeking Does Not Necessarily Mean More Problem Gambling

The fact that more people may now be seeking help does not necessarily mean that problem gambling is increasing. An increase in help seeking could be due to the following contributors:

- New Zealand’s estimated resident population reached over 5 million in March 2020. The population growth from 4 million in 2003 is thought to be the fastest million in New Zealand’s History, taking only 17 years to reach this milestone;
- A change in society’s attitude towards seeking counselling services and seeking help. People are these days more aware of the services available to them and are more inclined to seek help;
- The general economic decline. A sharp increase in help seeking experienced in the period from 2008 to 2011 corresponds with the global financial crisis. A reduction in disposable income tends to bring any gambling loss to the fore;
- A corresponding increase in television, radio and newspaper advertising by treatment providers has allowed gamblers to be more aware of the counselling services offered.

Harm Prevention & Minimisation - Support & Systems

Class 4 Gaming Societies are heavily regulated by the Department of Internal Affairs, socially responsible and very committed to Harm Prevention & Minimisation.

GTCL and its venues are committed to creating a ***Culture of Care*** for our gambling customers; and operate within a comprehensive Society and Venue Harm Prevention and Minimisation Policy. We expect venue management to support their staff to provide a Culture of Care for gambling customers and to become Responsible Gambling Hosts. We aim to provide an environment that supports Responsible Gambling and understand that although for some people gambling is a form of entertainment for others there are some harmful effects.

There is already a regulatory requirement for staff and managers of Class 4 Gaming Venues to be trained in how to monitor and recognise problem gamblers; and how to intervene appropriately to

ensure that they seek help and support for their problem. This, in our view, is the most effective way of helping the very small proportion of people who have a problem to manage that, whilst leaving the greatest proportion of people to fulfil their legitimate desire to gamble responsibly. GTCL, like all other Class 4 Gaming Societies provide significant funding to the Ministry of Health through an annual Problem Gambling Levy. This equates to almost \$11 million a year that the Government is receiving through the Problem Gambling Levy to help those at risk from their gambling. This funding helps to assist problem gambling support services in the Wellington City Region, including the Problem Gambling Foundation, The Salvation Army, and the Gambling Helpline.

On top of this Class 4 Gaming Societies across New Zealand spend an additional \$3-4 million each year on Harm Prevention & Minimisation initiatives such as training, compliance checks and administering the Exclusion Process. GTCL provides significant on-going training to venue management and staff on how to identify and support problem gamblers. Dedicated field staff are available at any time to provide the Harm Prevention & Minimisation Training and support to venue management and staff.

GTCL also provides the following resources to venues:

- GTCL Venue Harm Minimisation Policies;
- Full Health Promotion Agency Gamble Host Packs including Quick Reference Guides to help identify Problem Gamblers, Posters and Training Tips;
- Problem Gambling Pamphlets;
- Daily Gaming Diary and Problem Gambling Observation Pad to record any problem gambling observations and action staff may take;
- Exclusion Order Books and an Exclusion Order process;
- Signage to display in and around the gaming room.

Example Venue Resources to assist with problem gambling provided by GTCL



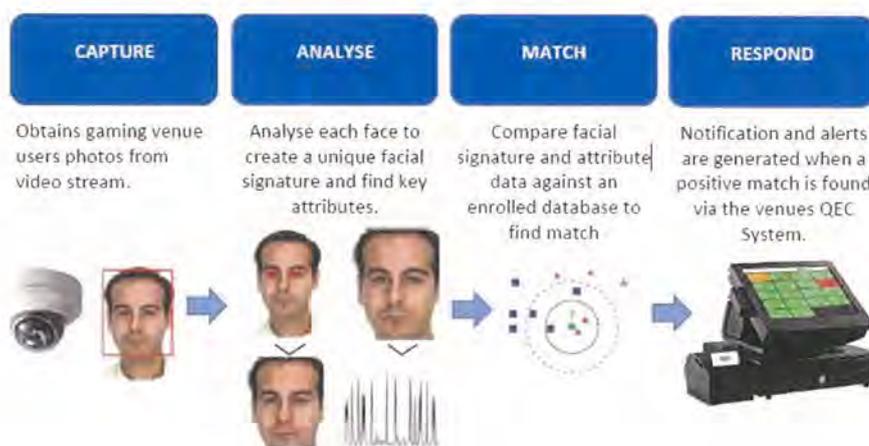
GTCL and its venues also fully support the Multi-venue Exclusion (MVE) & National Database Exclusion Program which operates across New Zealand; providing Problem Gamblers with the option to exclude themselves from multiple venues at once.

Harm Prevention & Minimisation Technology - Facial Recognition

GTCL is a big believer in staying up to date with the latest technology offered in the industry, such as Facial Recognition and CONCERN/Persons of Interest.

Facial Recognition software known as “The Guardian” is a fully integrated solution for recognising registered problem gamblers as they enter and move around a gaming venue. Multiple high-definition cameras are installed to cover entranceways, thoroughfares, and gaming room activity. Cameras interface with a specialised controller which will detect people entering or moving around the venue and record unique faces. Once the faces have been detected, they are then sent to the central, cloud-based, facial recognition system, which will compare facial data received from the cameras to identify any persons of interest. These persons of interest may be self-excluded problem gamblers registered in the database. Notifications and alerts are generated through the Venue Management System so that staff become aware of excluded gamblers present at their venue.

The Guardian – Four Very Simple Steps



This system is cost prohibitive so where Facial Recognition is not installed at a venue, all GTCL venues are provided with CONCERN/Person of Interest, which electronically records Excluded Persons and integrates with the National Exclusion Database. Venue Staff accept new multi-venue exclusion orders electronically received through CONCERN/Person of Interest which is operating on their front of house gaming management system. Venue Staff are also able to regularly view photos to assist with their monitoring of the gaming area.

Unintended Consequences – Increase in Internet and Mobile Phone Gambling

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

In April 2020, the Health Promotion Agency released a Report on the Impact of COVID-19⁴ on Alcohol Consumption, Smoking, Gambling and Health & Wellbeing. The Health Promotion Agency reported that 1190 New Zealanders over the age of 18 took part in the online survey which took place during days 13 – 19 of the Level 4 Lockdown period. The report found that:

- 20% of the respondents were either gambling more than usual online or gambling for the first time online; and
- Of those respondents that reported increased online gambling, 51% advised that the reason for this was *"I can't go to my usual places to gamble or to buy tickets so I have switched to gambling online for now"*.

It now takes only a simple search and a few minutes to download to your computer, tablet or mobile phone any type of casino game you desire, including an exact replica of the gaming machine programs currently available in New Zealand venues.



Offshore-based online gambling, poses considerable risks because it:

- Is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
- Has no restrictions on bet sizes;
- Has no capacity for venue staff to observe and assist people in trouble;
- Reaches new groups of people who may be vulnerable to the medium;
- Provides no guaranteed return to players;
- Is more easily abused by minors;
- Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and
- Is unregulated, so online gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend that they induce to also open an account and deposit funds.

Any reduction in gaming machines only redirects gamblers to offshore-based internet gambling and there is no harm minimisation advantage in that strategy. By reducing the number of class 4 gaming venues, this may actually drive gamblers away from the controlled environment of a gaming lounge, to an uncontrolled environment of online gambling which cannot be monitored at all. In addition, there are further disadvantages in the fact that no community funding is generated for New Zealanders, no tax revenue is generated for the New Zealand Government and no contributions are made via the New Zealand problem gambling levy.

⁴ <https://www.hpa.org.nz/research-library/research-publications/the-impact-of-lockdown-on-health-risk-behaviours>

Conclusion

As noted in our introduction, GTCL is supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused from gaming.

GTCL requests that Council consider no change to the current gaming machine and venue cap numbers however consider expanding the current relocation provisions to include the Wellington Central Area Zone, allowing relocations for those venues inside this zone to relocate within the zone, who may be earthquake prone, dangerous and insanitary.

Kind regards

On behalf of the Grassroots Trust Central Board of Directors



Sean Hannan
Chairman

New Zealand Festival

PO Box 10113
Wellington 6143
New Zealand
Festival.nz

1 October 2020

Re: Submission regarding the Wellington City Gambling Policy Review

Tēnā koe,

I wanted to take this opportunity to acknowledge the impact of gaming trust support on the New Zealand Festival of the Arts.

This submission is not reflective of our views on gambling and gaming machines but seeks to outline the impact of the funding these trusts provide our organisation, events, artists and audiences. As Wellington City Council is a major funder and partner, we are obligated to outline the risks to New Zealand Festival of the Arts events and activities if gaming trust funding was no longer available, or significantly reduced.

The funding support we receive from gaming trusts is significant, representing approximately 7% of the income New Zealand Festival of the Arts in the 2020 financial year. In the past, Wellington City Council and other funders have had strong expectations that we are able to leverage additional revenue to fund the Festival in order for us to be sustainable. Gaming trust funding has gone towards staffing costs, local accommodation, community outreach/programming, City venue hire, print, AV and technical supplier costs. As a not-for-profit organisation, this funding is critical to allow us to present artistic events and bring the arts to communities across the Wellington region and further afield. This support also enables us to keep our events accessible and as affordable as possible – two thirds of our audiences experience free events in the Festival.

It's important to acknowledge that funding for the arts in the region is now more crucial than ever while our communities manage the long-term impacts that the Covid-19 pandemic has had on all aspects of life in New Zealand. We are working to mitigate the impact of this crisis on our artists, supporters and our audiences – and ensure that the arts plays a key role in maintaining the wellbeing of communities over this time. The support we currently receive from gaming trusts is an important part of that mix. Without alternative funding to replace it, loss of gaming trust revenue would further exacerbate an already challenging landscape where sponsorship, donations and box office revenue are under pressure due to the major economic downturn facing the country and the world.

The Festival's impacts are significant, we provide substantial cultural, social and economic benefit for the City and region. Enabled through the support of Aotearoa gaming trusts and our other funders, partners and supporters, the 2020 New Zealand Festival of the Arts delivered:

- 200+ events, including 92 free experiences

New Zealand Festival

- We welcomed 500 artists from 33 countries to engage, entertain and challenge
- Our most accessible and inclusive Festival to-date, 16 accessible events delivered, 8 of which were free
- Free events enjoyed by more than 100,000 people
- *Te Ata*, a groundbreaking festival for youth in Porirua placing young people at the helm of collective action through creative expression
- 14 new productions by New Zealand artists commissioned
- More than 8,500 youth engaged through free events, workshops, family focused content, SchoolFest and more.

Thank you for considering our submission regarding this policy review.

Ngā mihi nui,

A handwritten signature in black ink, appearing to read 'Meg Williams', with a large, sweeping flourish extending to the right.

Meg Williams
Executive Director



Submission to the:
WELLINGTON CITY COUNCIL

on the:
GAMBLING VENUES POLICY – STATEMENT OF PROPOSAL

Submission from:
TENNIS CENTRAL REGION (INC.)

This submission is representing the 17 tennis clubs in Wellington City and 3,000+ members and casual participants of Tennis Central Region Inc. who reside in Wellington City.

Date:
1 October 2020

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.), on behalf of the 17 tennis clubs located in Wellington City and more than 3,000 tennis club members and casual participants that reside in Wellington City, appreciates the opportunity to present this submission to Wellington City Council on the Gambling Venues Policy – Statement of Proposal.

Background

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.

Tennis Central has four key focus areas, which are:

- Participation and development – successfully supporting clubs to grow the game; and guiding players and coaches through the participation pathway.
- Performance – successfully deliver a range of events and tournaments for performance-focused participants; and support performance achievement.
- Organisational excellence – continuous improvement in our organisational performance.
- Sustainability – operating a sustainable business underpinned by secure revenues and prudent reserves.

The ability of Tennis Central to achieve desired outcomes specific to these key focus areas is aligned to the financial resources available to Tennis Central and its member clubs. At the present time the vast majority of revenue for the sport comes from player fees, player subscriptions and funding sources. Class 4 gaming machine proceeds is the predominant funding source to the sport of tennis.

Benefits provided by Class 4 gaming machines to Tennis

The main concern that the tennis community has in relation to the potential changes to the Wellington City Council's Gambling Venues Policy is that the available funding will ultimately diminish. At the present time the

funding received from Class 4 gaming machine proceeds by Tennis Central and its affiliated tennis clubs reduces the capacity to which cost is a barrier to participation. Very few sport and recreation organisations charge the true cost of their sport or recreation to participants. It is widely accepted that true cost would result in sport and recreation being unaffordable to many and therefore inaccessible to sectors of the community, in particular those from the lower socio-economic demographic.

Funding received from Class 4 gaming machine trusts could support any number of projects. Examples include:

- Tennis court re-surfacing to ensure courts at the Wellington Renouf Tennis Centre and tennis clubs remain of a suitable standard for on-going use;
- Purchasing equipment, such as modified tennis nets for juniors, tennis balls and uniforms;
- Reducing costs for travel and accommodation for players, typically junior players, to attend national tennis events;
- Reducing the costs of various participation programmes through subsidising coach and programme deliverer costs; and
- Contributing to salaries, wages and contract fees of personnel that are responsible for delivery of tennis.

Funding towards any and all projects has one ultimate outcome. It reduces the extent to which participants must pay the true cost of providing tennis.

Any reduction in Class 4 gaming machine proceeds will have two significant outcomes:

1. Cost will become a barrier to participation, which will ultimately result in a decline in participants; and
2. Tennis Central and tennis clubs will have to reduce the services and experiences they provide, which will ultimately result in a decline in participants.

Preferred position: Gambling Venues Policy

The preferred position of the tennis community is Option C - No change to the current arrangements relating to gaming machines and venues in Wellington.

In stating this preferred position, it is done so on the basis of preserving existing funding sources for the reasons already identified. The Wellington City Council should not consider any alternate position, including Option A or Option B, until it has considered the wider impact on society of a change to the Gambling Venues Policy. Such consideration would include confirming what alternate source of funding is available to the sport and recreation sector, and other community organisations that benefit from this source of funding, to ensure cost does not become a barrier to participation.

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. As a result, any efforts to address problem gambling should be given due consideration.

The Benefit of Sport and Recreation (including Tennis)

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 and recreation, 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.

Any decision that would ultimately reduce the Class 4 gaming machine funding available to sport and recreation will cause harm to Wellington as many of its people will lose the opportunity to engage in sport and recreation and gain the benefits that are offered through participation in sport and recreation.

Conclusion

Tennis Central requests that the Wellington City Council retains the status quo, opting for Option C. The proceeds of Class 4 gaming machines do too much good in society that needs to be suitably replaced before any significant change to the Wellington City Council's Gambling Venues Policy should be approved. A reduction in Class 4 gaming machines will almost certainly result in a decrease in funding available for community organisations.

22 September 2020

Wellington City Council
PO Box 2199
Wellington 6140
New Zealand

RE: Submission on the Gambling Venues Policy



PO Box 26042
Wellington 6442
L1, 223 Thorndon Quay
Thorndon, Wellington 6021
☎ 04 939 1102
✉ csw@collegesport.org.nz
📘 CollegeSportWellington
🌐 www.collegesport.org.nz

As Executive Director, I write this submission on behalf of College Sport Wellington and its 40 member secondary schools.

College Sport Wellington is a registered charitable organisation and we are the guardians of sport in the 40 secondary schools of the Greater Wellington region north to including Otaki. We are the primary deliverers of sporting competitions and development opportunities to the 27,000 students in these schools. Last year just under 60% of the students in this region played sport for their school – the highest of the major metropolitan areas and in part we attribute this to the broad programme opportunities we provide.

In support of this submission, we know and are regularly identified as national leaders in this sector and are obviously keen to maintain and where possible grow further our engagement with rangitahi and the sporting communities of the region. This is evidenced by the School Sport New Zealand census where we annually compare our performance against the other major metropolitans. The attached census and supporting analysis shows this and points to the excellent work carried out by College Sport Wellington and its member schools.

As with all Sports Organisations, the last several months have been a challenging time for College Sport Wellington. However, through careful financial management and planning, we have managed to re-engage our students in physical activity opportunities. With the bulk of winter sports now completed, we have recrafted the calendar so that our students missed only a fraction of their normal sporting opportunities. At the same time, we have used this opportunity to look at how we can offer other participation opportunities that engage even more students. Looking ahead, we're confident College Sport Wellington will come out of the current challenges stronger and more focused.

However it is with deep concern we note the proposal to introduce a sinking lid policy for Class 4 gaming in Wellington City. The effect of such a policy on College Sport Wellington and its member schools, particularly at this time, would be profound and to the detriment of our rangitahi. We therefore support Option C, that being no change to the current arrangements, relating to machines and venues in Wellington. The basis for supporting Option C is as follows:

There is no evidence to justify a change from the status quo.

- There has been no significant rise in the number of machines and/or venues. We understand that since 2004, venue numbers have reduced, and that gaming machine numbers have also reduced by 25% over the last 10 years. The level of gambling and the

problem gambling rate has remained at the same level over that time. New Zealand has one of the lowest problem gambling rates in the world.

The timing of the proposed changes and the current environment

- The community funding model currently used to distribute Class 4 gaming is working well. However, Covid-19 has had a devastating effect on many sectors including active recreation and sport because of lockdown impacting the flow of funds and the inability of Class 4 organisation to hold reserves. This has put at risk many secondary school sport activities and the consequent value that these activities create for communities.

No viable, sustainable alternative funding sources

- Fewer machines mean fewer grants. In the last 12 months funding generated across the wider region from Class 4 gaming was \$61 million of which \$16.9 million was returned to community activity in Wellington city. There are no other sources of funding currently that would provide a substitute for the amount of Class 4 funding being accessed by the community.
- Community active recreation and sport organisations have traditionally been reliant on Class 4 gaming, and while this makes these organisations vulnerable this is their reality where they are using a funding source that is regularly available and accessible in the absence of other viable funding options. There are organisations in our region who would become insolvent almost immediately without this funding.
- As an organisation we work hard to diversify our income, however corporate dollars are extremely difficult to access, fundraising activity does not generate a high return, and there is unlikely to be any Government funding set aside to cover the activities that are currently funded by Class 4. As we move as a country into a recession, this will make accessing funding from alternative sources even more difficult.
- In the case of College Sport Wellington and its schools, funding received mitigates the barrier of cost to participation. We work very hard to keep the cost of participation to an absolute minimum, and as such, run a very lean organisation. Without this funding, and given the limited corporate dollars available, our alternative is to meet a shortfall through increased student levies and participation fees. This will create a greater barrier to participation, particularly for our most disadvantaged rangitahi.

The magnitude of good overlooked

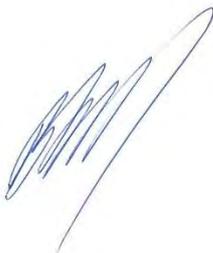
- We acknowledge there is a social cost to gambling when this becomes a problem for an individual impacting family and friends. However, for the sake of balance, the vast social value created by the funding generated from gambling must also be properly acknowledged. Children, in particular, are the beneficiaries of the application of these funds.
- It is important to recognise that this funding is not applied to projects or programmes that are 'nice extras'. Funding in the vast majority of instances is used to support core costs incurred within sport and recreation and in many cases to keep the doors open. The common categories across which funding can be classified are salaries, facility hire costs, sports equipment, maintenance, events, tournaments and camps, and coaching.

Other considerations:

- Class 4 Gaming is well-regulated to provide a financial return to the community for the benefit of those communities and moves to reduce or remove this opportunity will have some undesirable consequences over time.
- The sinking lid option is proposed to address the harm done by Class 4 gaming. However, the proposal does not give thought to the harm that may be created as a consequence of the withdrawal of the community services that are currently funded through Class 4 gaming returns. In the case of active recreation and sport the value to individuals and communities is well documented.
- There will also be some financial consequences for Wellington City Council should a sinking lid policy be applied. As an example, gaming funding is often accessed to cover costs associated with facility and ground hire from Wellington City Council. In addition, there will be expectations on Council to fund activities that were previously funded through gaming proceeds, in order to at least preserve the status quo in terms of delivery of active recreation and sport services.
- Taking gaming machines out of communities will not reduce problem gambling. As we saw through Covid-19 lockdown, people who want to gamble will find other ways to do so. While the extent of online gambling by New Zealanders has yet to be fully researched, it is obvious from overseas research and anecdotal evidence that online gambling is growing very quickly. Online gambling options are more harmful as a consequence of being unsupervised, less regulated, incentivised to encourage more gambling, and using virtual money rather than cash. And, there is no return to the community.

We thank the Wellington City Council for the opportunity to make a submission on this proposal, and urge Councillors to consider the wider impacts upon the active recreation and sport sector if a sinking lid policy is introduced.

Yours Faithfully,



Bryan Dickinson
Executive Director

2019 BY THE NUMBERS

15,718



5,718 Students pulled on their school colours in 2019. This equates to 7,232 females and 8,486 males.



Netball, Football, Basketball, Rugby and Futsal continue to be the top 5 sports played by students

26%

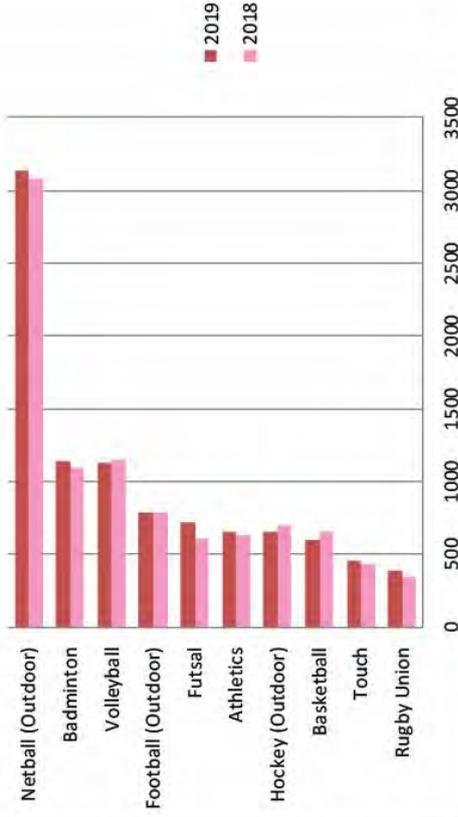
of Teaching staff were involved in Sport



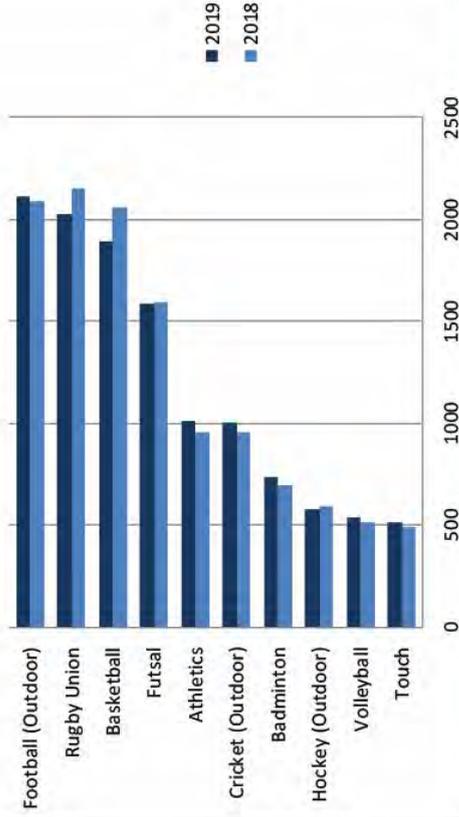
58%

Students participated in sport

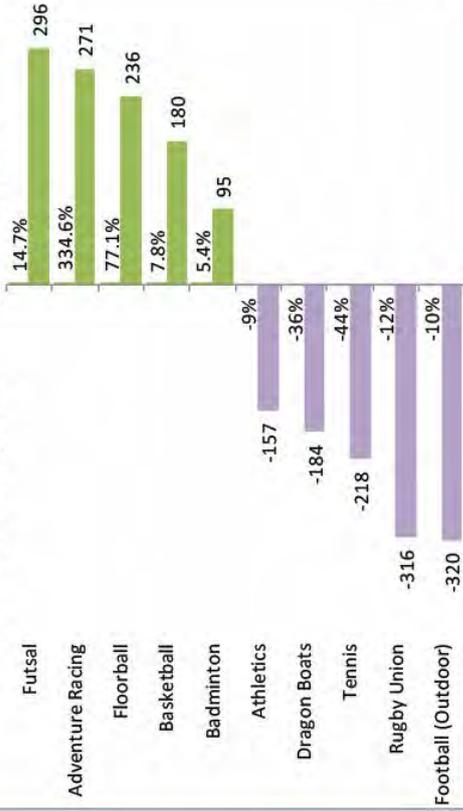
Top 10 Girls Secondary School Sports in Wellington 2019 v 2018



Top 10 Boys Secondary School Sports in Wellington 2019 v 2018



Significant increases and decreases in participation in secondary school sport in Wellington 2019 vs 2016



Gambling Venues Policy consultation

19

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Your views on the Gambling Venues Policy will help inform councillors and help finalise the new Gambling Venues Policy.

The Council will consider your feedback and the new policy, if adopted, will come into effect from 1 December 2020.

Submissions close at 5pm on Thursday 1 October 2020.

Your details

Your name*	Raman Chhina
Your email or postal address*	[REDACTED]
You are making this submission	Wellington Indian Association
<input type="checkbox"/> as an individual	
<input checked="" type="checkbox"/> on behalf of an organisation. Your organisation's name*	
I would like to make an oral submission to the Councillors	
<input checked="" type="checkbox"/> Yes	mobile.
<input type="checkbox"/> No	[REDACTED]
If yes, please give your phone number so that a submission time can be arranged*	

*mandatory field

What is your preferred option?

<input type="checkbox"/> Option A Implement a sinking lid
<input type="checkbox"/> Option B Lower the caps on the maximum number of machines by 87, align zone names to the 2019 Representation Review and reinstate the Primary Activities Clause
<input checked="" type="checkbox"/> Option C Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is: The current ward caps should be retained. The relocation policy should be expanded to allow relocations within the CBD (currently the policy only allows venues to relocate from outside the Central Area Zone to within the Central Area Zone).

What strengths does your preferred option have over the other options?

Gaming machine funding is extremely important to a large number of community organisations within Wellington City. The current funding provided by the gaming trusts is vital. There is no replacement funding available.

The current caps strike a fair balance. It is appropriate that they remain. The introduction of a more restrictive policy will adversely affect community funding and increase the migration of the gambling spend to online providers. Offshore-based online gambling providers do not make any community grants, do not create any local employment, and do not pay any taxes to the New Zealand Government.

Is there any other information you want to include in your submission?

I also consider that it is fair and reasonable to expand the current venue relocation provision to enable existing gaming venues within the Central Area Zone to move to new, modern premises, to move to buildings that have a higher earthquake rating, and to move if the current landlord is imposing unreasonable terms.

Free Post WCC

**Absolutely Positively
Wellington City Council**

Me Heke Kī Pōneke



FREEPOST 2199
259/1001

Gambling Venues Policy – 2591001
PO Box 2199,
Wellington 6140

Gambling Venues Policy consultation

24

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Your views on the Gambling Venues Policy will help inform councillors and help finalise the new Gambling Venues Policy.

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Submissions close at 5pm on Thursday 1 October 2020.

Your details

Your name*	TIM BIGNALL
Your email or postal address*	[REDACTED]
You are making this submission	
<input type="checkbox"/> as an individual	
<input checked="" type="checkbox"/> on behalf of an organisation. Your organisation's name*	TE MAORI CULTURAL CNTR
I would like to make an oral submission to the Councillors	
<input checked="" type="checkbox"/> Yes	[REDACTED]
<input type="checkbox"/> No	
If yes, please give your phone number so that a submission time can be arranged*	

*mandatory field

What is your preferred option?

<input type="checkbox"/> Option A Implement a sinking lid
<input type="checkbox"/> Option B Lower the caps on the maximum number of machines by 87, align zone names to the 2019 Representation Review and reinstate the Primary Activities Clause
<input checked="" type="checkbox"/> Option C Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is: The current ward caps should be retained. The relocation policy should be expanded to allow relocations within the CBD (currently the policy only allows venues to relocate from outside the Central Area Zone to within the Central Area Zone).

What strengths does your preferred option have over the other options?

Gaming machine funding is extremely important to a large number of community organisations within Wellington City. The current funding provided by the gaming trusts is vital. There is no replacement funding available.

The current caps strike a fair balance. It is appropriate that they remain. The introduction of a more restrictive policy will adversely affect community funding and increase the migration of the gambling spend to online providers. Offshore-based online gambling providers do not make any community grants, do not create any local employment, and do not pay any taxes to the New Zealand Government.

Is there any other information you want to include in your submission?

I also consider that it is fair and reasonable to expand the current venue relocation provision to enable existing gaming venues within the Central Area Zone to move to new, modern premises, to move to buildings that have a higher earthquake rating, and to move if the current landlord is imposing unreasonable terms.

Free Post WCC

**Absolutely Positively
Wellington City Council**

Me Heke Ki Pōneke



FREEPOST 2199
259/1001

Gambling Venues Policy - 2591001
PO Box 2199,
Wellington 6140

3/12/18



**REGIONAL ACTIVE RECREATION AND SPORT SECTOR
SUBMISSION TO WELLINGTON CITY COUNCIL'S
PROPOSED GAMBLING VENUES POLICY**

WELLINGTON CITY COUNCIL

on the:

GAMBLING VENUES POLICY – Statement of Proposal

Joint submission from:

SPORT WELLINGTON and REGIONAL/NATIONAL ACTIVE RECREATION AND SPORT SECTOR ORGANISATIONS

- Capital Football
- Tennis Central
- Netball Wellington Centre
- Wellington Rugby
- D Sport
- Cricket Wellington
- Bowls Wellington
- Squash Wellington
- Swimming Wellington
- Gymnastics NZ
- Touch NZ
- Y-Central
- Wellington Hockey
- Wellington Softball
- Capital Basketball
- Wellington Rugby League

Date:

1 October 2020

Address for contact:

Phil Gibbons ONZM

Chief Executive

Sport Wellington

Email: philg@sportwellington.org.nz

Phone: 021 650 604

INTRODUCTION

1. Thank you for the opportunity to provide feedback on the Gambling Venues Policy – Statement of Proposal. This is a joint submission from regional/national active recreation and sport organisations and Sport Wellington.

THE VALUE OF ACTIVE RECREATION, AND SPORT

2. Active recreation and sport activities play a significant part in people's lives in Wellington and the wider region.
3. Sport New Zealand's 2015 report on The Economic Value of Sport and Recreation to the Wellington Region identified the following:
 - Nearly 9 out of 10 (89.7 per cent) young people (5-17 years) in the region spend at least three hours per week in organised or informal sport and recreation activity.
 - Over 8 out of 10 (86.5 per cent) adults (18 years or older) take part in at least one sport or recreation activity (excluding walking and gardening) over a year.
 - These activities are supported by 115,000 volunteers.
 - Volunteers contributed 8.1 million hours to sport and recreation in 2013/14.
 - The estimated market value of these volunteered services is \$122.7 million at 2013 values.
 - Sport and recreation industries provide employment for people in the Wellington region
 - More than 4,000 people (4,311) work in sport and recreation industries
 - The sport and recreation sector (narrowly defined) is estimated to have contributed \$388.6 million to regional GDP in 2012/13, or 1.3 per cent.
 - Sport and recreation education is important in Wellington schools with just over five per cent of the National Curriculum being related to sport and recreation.
4. A further Sport NZ study exploring the value of sport to New Zealanders, their communities and our country found that participation in active recreation and sport leads to:
 - Happier, healthier people (both physically and mentally)
 - Better connected communities as a result of strengthened social and community networks
 - A stronger New Zealand – financially and through strengthened regional and national identity.

OPTION C – OUR PREFERRED OPTION

5. After consideration of the Statement of Proposal, our preferred option is Option C: No change to the current arrangements relating to machines and venues in Wellington.

Why Option C?

6. We support Option C because:

There is no evidence to justify a change from the status quo.

- There has been no significant rise in the number of machines and/or venues. We understand that since 2004, venue numbers have reduced, and that gaming machine numbers have also reduced by 25% over the last 10 years. The level of gambling and the

problem gambling rate has remained at the same level over that time. New Zealand has one of the lowest problem gambling rates in the world.

The timing of the proposed changes and the current environment

- The community funding model currently used to distribute Class 4 gaming is working well. However, Covid-19 has had a devastating effect on many sectors including active recreation and sport because of lockdown impacting the flow of funds and the inability of Class 4 organisation to hold reserves. This has put at risk many community activities and services provided through active recreation and sport and the consequent value that these activities create for communities.

No viable, sustainable alternative funding sources

- Fewer machines mean fewer grants. In the last 12 months funding generated across the wider region from Class 4 gaming was \$61 million of which \$16.9 million was returned to community activity in Wellington city. There are no other sources of funding currently that would provide a substitute for the amount of Class 4 funding being accessed by the community.
- Community active recreation and sport organisations have traditionally been reliant on Class 4 gaming, and while this makes these organisations vulnerable this is their reality where they are using a funding source that is regularly available and accessible in the absence of other viable funding options. There are organisations in our region who would become insolvent almost immediately without this funding.
- Organisations are working hard to diversify their income however, corporate dollars are extremely difficult to access, fundraising activity does not generate a high return, and there is unlikely to be any Government funding set aside to cover the activities that are currently funded by Class 4. As we move as a country into a recession, this will make accessing funding from alternative sources more difficult.

The magnitude of good overlooked

- We acknowledge there is a social cost to gambling when this becomes a problem for an individual impacting family and friends. However, for the sake of balance, the vast social value created by the funding generated from gambling must also be properly acknowledged. Children, in particular, are the beneficiaries of the application of these funds.
- It is important to recognise that this funding is not applied to projects or programmes that are 'nice' extras. Funding in the vast majority of instances is used to support core costs incurred within sport and recreation and in many cases to keep the doors open. The common categories across which funding can be classified are salaries, facility hire costs, sports equipment, maintenance, events, tournaments and camps, and coaching.

COMMENT

- We acknowledge there is a negative impact of gambling. While New Zealand has one of the lowest problem gambling rates in the world (0.2% across all forms of gambling) we recognise that there is a need for help and assistance for those for whom gambling is an addiction and detrimental to their wellbeing.

- The industry pays an annual problem gambling levy of \$20 million to the Government and gaming trusts directly spend \$3-4 million each year on other harm prevention and minimisation initiatives.
- We support the continued funding to address this issue.
- This is the funding system that is currently available to sector groups. There are no viable alternatives and funding from other sources is difficult to access despite the hard work and continued effort of sector organisations to do. Covid-19 has made this even tougher.
- Class 4 Gaming is well-regulated to provide a financial return to the community for the benefit of those communities and moves to reduce or remove this opportunity will have some undesirable consequences over time.
- The sinking lid option is proposed to address the harm done by Class 4 gaming. However, the proposal does not give thought to the harm that may be created because of the withdrawal of the community services that are currently funded through Class 4 gaming returns. In the case of active recreation and sport the value to individuals and communities is well documented. <https://sportnz.org.nz/media/1312/the-value-of-sport-main-report.pdf>
- There will also be some financial consequences for Wellington City Council should a sinking lid policy be applied. As an example, gaming funding is often accessed to cover costs associated with facility and ground hire from Wellington City Council. In addition, there will be increased expectations on Council to fund activities that were previously funded through gaming proceeds, to at least preserve the status quo in terms of delivery of active recreation and sport services. Some of these impacts are listed later in this submission.
- Taking gaming machines out of communities will not reduce problem gambling. As we saw through Covid-19 lockdown, people who want to gamble will find other ways to do so. While the extent of online gambling by New Zealanders has yet to be fully researched, it is obvious from overseas research and anecdotal evidence that online gambling is growing very quickly. Online gambling options are more harmful because they are unsupervised, less regulated, incentivised to encourage more gambling, and use virtual money rather than cash. And there is no return to the community.

In conclusion:

- We thank you again for the opportunity to provide you with feedback on your Statement of Proposal for change to your Gambling Venues Policy.
- For the reasons outlined in this submission we support Option C: No change to current policy
- We will take the opportunity to speak to this submission.



Phil Gibbons ONZM
CEO, Sport Wellington
on behalf of sector organisations

APPENDIX 1: Statements of impact

College Sport Wellington

- Funding from gaming makes up 15% of CSW's annual revenue
- Among other things, projects funded in 2019 included:
 - 3000 medals for students
 - Venue hire for Volleyball, Netball, Basketball
 - The sports listed above (venue hire) represent some of our more expensive to run – due to using the council facilities (ASB in particular).
 - First Aid Services (Wellington Free Ambulance and Wellington Sports Med) for CSW events
 - Officials standing fees; umpires, referees etc etc
- We run a relatively lean operation, so there is no fat to trim if gaming funding reduces. Shortfalls will need to be made up from entry fees and student levies, given the likelihood of sponsorship is lessened for the foreseeable future.

Swimming Wellington

Gaming funding was used to fund:

- Tog Box – a joint initiative between Swimming Wellington and Water Safety NZ to collect second-hand togs and goggles throughout the Wellington Region and redistribute them to children in low decile schools so they are able to participate in water education programmes for safety and health. Many kids were missing out because they didn't have togs. Trust funding is required to have the time and resources necessary to develop and operationalise this sort of initiative. (This sits outside core business for both organisations but provides a valuable service to the community).

In the absence of gaming funding

- We have an expectation that council would significantly reduce pool hire costs for swimming events to offset the Class 4 funding currently received for that purpose – otherwise event entry costs would have to go up significantly and accessibility and participation for children would be severely compromised

Capital Football

- WCC charges Capital Football for the use of their grounds to run football competitions. This cost is built into affiliation fees and subsequently passed onto clubs as part of the cost to play in Capital Football competitions. Clubs apply for and access Class 4 Gaming to support the costs of such fees.
- Capital Football estimates that \$168,000 of the total WCC ground charges (\$258,00) are successfully applied for and accessed through Class 4 Gaming. On top of this clubs personally book their own training times through the WCC for a further \$100,000 of which we estimate that at least 90% would be funded by Class 4 Gaming. This brings the total payment (per year) to WCC to \$258,000. This number is for football only, if WCC were to factor in other codes it would be well and above \$500,000.



Wellington City Council
Sent via email
Policy.submission@wcc.govt.nz

17 September 2020

The Review of Gaming Venues Policy: Submission

The Tararua Mountain Race is operated by the Tararua Mountain Race Trust which was established in 2011 by some previous participants and members of the Wellington mountain running community.

The purpose of the Trust is to support mountain running activities with any profits from the event going to LandSAR (Land Search and Rescue) in the Wellington Region.

The six volunteer Trustees, all of whom are past or present competitors are: Terry Patterson (Chair), Paul Helm, Jo Holden, Ben Clendon, Allan Stowell and Mike Sheridan.

Cat McBean took over the role as the Race Director for 2017. Cat has been involved with the race for over 5 years at the start and finish. Cat works in sport management and has volunteered for a number of iconic outdoor races and events, such as the Mountains to Sea and The Big Coast.

Who is Wellington LandSAR?

LandSAR Wellington is an organisation of unpaid professionals that provide search and rescue services to the Police and the Rescue Coordination Centre across the greater Wellington region. Their members are **available 24 hours a day, 7 days a week to help the lost, missing and injured**. In a typical year they donate over 16,000 hours of their time in training and operations to the community.

Their members are dedicated volunteers that deliver their services for free. They provide an operational response to emergencies that is completely free of charge to either the victim or government.

Operations can happen anywhere, including in suburban areas, Wellington's regional and forest parks, rural areas, in the hills and mountains and along our coastline. They're just as likely to be searching for a dementia sufferer in Wellington as a trumper in the Tararua Forest Park. **In just one year they responded to 27 incidents (2,449 hours), held 16 training activities (1,490 hours) and held 11 other events (233 hours). They rescued 45 victims.**



Gambling Problem Acknowledged

We recognise there is a negative impact of gambling. The 0.5% of gamblers who do have a problem need help and assistance with this addiction, however, we understand 1.3% of Class 4 profits are allocated to addressing this issue. We strongly support the continued funding to address this.

We also believe there has not been any significant decline in the number of problem gamblers resulting from the implementation of the sinking lid policy in other Territorial Local Authorities. Therefore we see this proposed policy of Wellington City Council as a blunt instrument, the efficacy of which is questionable.

Community Benefit

Especially for small community organisations, reliance on Class 4 funding is the reality of sport, recreation, community service delivery in New Zealand – especially in a COVID19 world.

For the Tararua Mountain Race we use Class 4 funding to offset the logistical costs of running this event, such as event insurance, van and portaloos hire, race bibs and first aid. By having this funding to offset these costs, it has allowed the **Trust to donate significant funds to Wellington LandSAR** from race proceeds.

From this year's event, the Trustees confirmed a donation of:

- \$4,000, adding to previous year's donations of
- \$6,000 (2019),
- \$3000 (2018),
- \$7,000 (2017), plus
- \$24,000 from earlier races.

What has LandSAR done with their donations?

\$2,000 went towards **emergent technology** allowing for increased efficiency and enable quick response to the ever-changing search environment, assisting searchers to find lost trampers, hunters and walkers more quickly.

\$3,000 went towards better purposed **Utility Vests** which is part of a 5-year roll-over programme to kit out members with the highly versatile and visible vests. The extra pockets, ID slot and radio pocket made the vests more practical in the outdoor setting for volunteers.

\$2,000 went to AREC - Amateur Radio Emergency Corp (AREC) who used these funds to purchase more **radio equipment**, vital for any search and rescue operation.



Why is community benefit so important?

Currently Class 4 gambling is legal. We believe it is far better for profits to be returned to the community than distributed as dividends to investors.

It is an unfortunate truth that Class 4 funding underwrites the fabric of our volunteer sport, active recreation, arts and community organisations.

So, until such time as an alternative funding source is established, Class 4 funding will remain the lifeline for volunteer organisations providing essential and important community services.

The real truism for us as a Trust is, without the support of Class 4 funding, organisations such as Wellington LandSAR would struggle to exist, and if they do, people who go into the outdoors and get lost or injured will face a higher risk of an adverse outcome – including death.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Cat McBean". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Cat McBean
Race Director

Geoff Lawson

From: Cook, David [REDACTED]
Sent: 01 October 2020 15:02
To: BUS: Policy Submission
Subject: Gambling Venues Policy - Submission

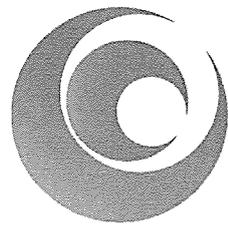
Gambling Venues Policy – Submission

I am strongly in favour of Option A – sinking lid.

In my immediate neighbourhood of Newtown we are saturated with Pokies venues. The benefit that communities gain from the proceeds is far outweighed by the misery generated from these addictive machines. My neighbours have been telling me very sad stories about their own struggles with pokies and the negative impact on friends and whanau. We need to actively move towards eliminating them and finding alternatives for supporting community organisations.

Can I please make an aural submission?

Thank you
David Cook



PGF GROUP

Healthy and resilient communities in a just society

WELLINGTON CITY COUNCIL CLASS 4 GAMBLING AND BOARD VENUE POLICY 2020

Paula Snowden
Chief Executive
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EXECUTIVE SUMMARY

The best Class 4 gambling venue policy for Wellington City Council to adopt is a comprehensive sinking lid policy, with no relocations, no venue mergers, and no new venues permitted. EGMs or 'pokies' that are in pubs, clubs and TABs are the most harmful form of gambling in New Zealand (Appendix 2), and although PGF Group advocates for sinking lid policies, we believe even this policy does not go far enough to minimise the harm from gambling in our communities.

Gambling machine numbers in Wellington City are reducing but only in small numbers, from 676 to 633 over the last five years. We continue to have 50% of pokies in our most deprived communities; 30-60% of the money being lost on pokies by problem gamblers, and a national spend that has been trending upward since 2014.

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

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

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

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

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

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

CLASS 4 GAMBLING IN NEW ZEALAND AND WELLINGTON

Expenditure and national gambling trends

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

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

Gambling in Wellington City

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

- 40 gambling venues hosting 633 pokies – a machine for every 258 adults in the City.
- 20 of the 40 gambling venues are sited in areas classed as having medium-high levels of deprivation. A breakdown of the progression of Class 4 gambling venue locations versus deprivation is included as Appendix 4.
- \$40.72 million lost to pokies in 2019; \$111,500 a day; each pokie machine making an average of \$64,300 during this period.

Gambling, the cost of living, and threshold of harm

The median income in Wellington is \$36,100 per annum, \$4,300 more than the national average. This is a weekly income of \$694. The median rental is \$350 per week so the remaining \$344 (before tax) must then provide food, power, petrol, the doctor, clothes, school trips etc.

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

Funding

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

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

Fifty percent of the 14,828 machines (7,414) are in the most deprived communities. Problem gamblers contribute between 30% - 60% of the amount paid out in community grants meaning that people

experiencing harm either lose the amount equal to grants or considerably more: \$282m, \$376m or \$563m. We have provided you with a copy of this paper.

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

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

Commercial implications

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

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

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

Class 4 pokies are a significant spend for deprived households.

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

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

Analysis (NZIER) indicates that the retail sector generates approximately four jobs per million dollars in sales from diverted gambling expenditure. Diverting \$40.7 million in gambling losses has the potential for up to 160 jobs of which up to 64 jobs would be in retail in Wellington City.

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

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

WHAT MAKES A GOOD POLICY?

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

The purpose of the Gambling Act is to:

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

Sinking lid policies

PGF Group commends the Wellington City Council on the decision to consult on a sinking lid as the preferred option. However, PGF Group submits that a comprehensive sinking lid, with no relocations or club mergers permitted, is the best policy to control the growth of gambling and minimise harm. We note that TAB venues are excluded from the sinking lid proposal, but we have been assured that any new Class 4 venue regardless of type will not be granted Council consent to operate under the sinking lid policy if it is adopted.

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

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

A sinking lid policy is compromised where machine relocation is permitted and/or venues and clubs are permitted to merge. Allowing pokies machines to be moved around an area means the machine numbers stay the same. Allowing mergers also enables the maintenance of existing numbers and risks creating 'pokie dens.' Research supports the argument that increased numbers of pokie machines leads to increased problem gambling prevalence.⁷

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

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

PGF RECOMMENDATIONS ON GAMBLING POLICY

PGF recommends the policy should include the following two provisions:

- **No relocations:** If a venue with pokie machines is forced to close or voluntarily closes, the council will not permit the pokies to be relocated to any venue within the council area.
- **No club mergers:** There will be no club mergers under any circumstances.
- **A ban on any new venues:** No permit will be given to operate any new venue or club in the council area if that venue proposes having pokies, including TAB venues.

PGF recommends these provisions:

1. Restrictions on venue and machine consents:

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

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

Gambling License and Liquor License

Some Class 4 venues struggle financially and use the income from pokie machines to “prop them up.” This is non-compliant with both the Gambling Act 2003 and the Sale and Supply of Alcohol Act 2012. This occurs when the primary activity is not entertainment, nor from the sale of alcohol and food.

Although the Gambling Act 2003 does not provide any legislative powers for councils to remove gambling licenses, District Licensing Committees can and have refused liquor license applications where the primary activity has been gambling. The most relevant decision was made by the Gisborne District Licensing Committee vs Kaiti Club Hotel Tavern. This was upheld by the Alcohol Regulatory Licensing Authority.

Class 4 venues operating in this manner need to be identified by either the Department of Internal Affairs or District Licensing Committees; however, this has not been the case in practice, and it took community action in both cases above to identify these issues. PGF Group recommends that council dedicate resources to investigating and monitoring venues to ensure all are compliant with legislation.

SOCIAL COST OF GAMBLING

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

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

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

Harmful gambling and children

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

Children become aware their parents cannot provide them with items such as presents, school trips and even food, not because of a lack of money but as a direct result of gambling behaviour. If a child's most basic needs are not met, they can suffer from health problems due to poor nutrition or malnutrition and the responsibility of meeting these needs may fall on extended family, schools and social services.

The children of problem gamblers can also suffer emotionally, and feelings of neglect can be a daily struggle. The parent may spend a great deal of time gambling, move out due to arguments about their gambling or disappear unpredictably. Their relationship with their child or children can be damaged as they become more secretive, unreliable and prone to breaking promises. The parent's personality can become unrecognisable to their children, who feel gambling has become more important than family.¹¹

A study of gambling in Māori communities outlines a model of how children are at risk if gambling is part of their young lives. When exposed to gambling activities from an early age, children grow up seeing gambling as a normal activity and central to social life – they may also participate from a young age. Dysfunction at home, in the form of financial problems or domestic violence increases the risk that they will look to gambling for an escape. As they grow, their gambling may become more intense until it has become problematic.¹²

Children of problem gamblers face higher likelihoods of having some of the following disorders at some point in their life as compared to the general population.

- Alcohol disorders (31% vs 4%)
- Major depression (19% vs 7%)
- Drug use disorders (5% vs 2%)
- Antisocial personality disorder (5% vs 0%)
- Generalised anxiety disorder (8% vs 0%)
- Any psychiatric disorder (50% vs 11%)¹³

Gambling and crime

Offending by gamblers has been investigated in a number of New Zealand and international studies. Despite difficulties in determining the extent of gambling-related crime and the causal pathways, it appears that problem gamblers are at high risk of committing crimes in order to finance their gambling activities.¹⁴

In 2008 a New Zealand study found that 25% of those engaged in criminal activity would not have done so if it had not been for their gambling. This suggests that a quarter of the relevant population, or about 10,000 people, committed illegal activities because of gambling.¹⁵

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

A 2009 New Zealand study found that “gamblers and significant others believe that a relationship exists between gambling and crime” and “there is substantial unreported crime, a large proportion of which is likely to be related to gambling and that there are a large range of crimes committed in relation to gambling (particularly continuous forms of gambling), and not just financial crimes”.¹⁸ They suggest that 10% of people experiencing problem gambling and two thirds of those receiving counselling for gambling-related issues have committed a crime because of their gambling.

Family violence

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

Economic degradation

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

Employment, normally considered a standard business cost, is framed within the gambling industry as a special benefit to the community. Even if gambling does create employment opportunities, a comparison of gambling and retail in terms of jobs created for every million dollars spent shows that gambling creates about half as many jobs as retail.²¹ A 2008 report noted that jobs and economic activities generated by gambling expenditure would exist elsewhere if that money was spent outside the gambling industry.²²

Remedies to problem gambling

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

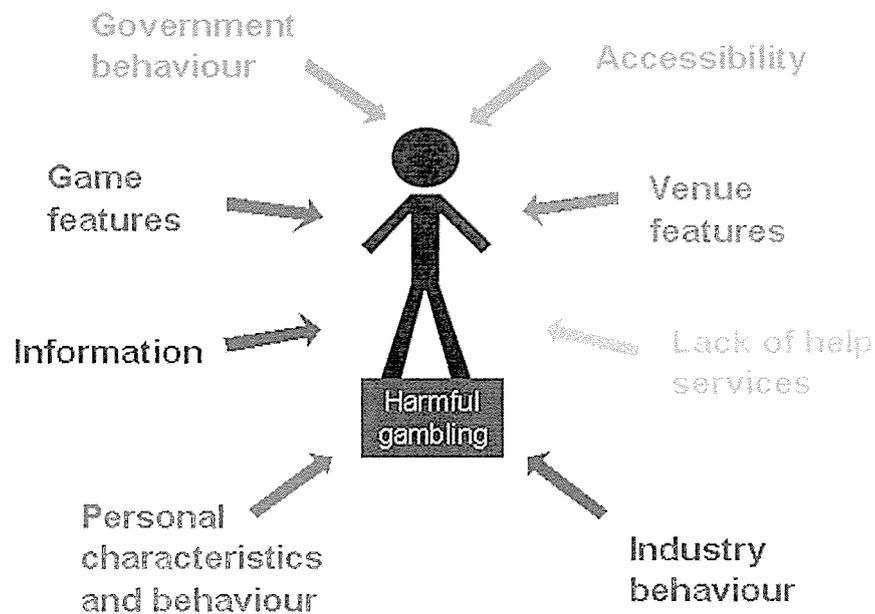
The report concludes that, “from the perspective of public policy, and particularly harm minimisation, holding or reducing electronic gambling machine numbers would appear to be prudent based on our findings, and is likely to lead to reduced harm both through reduced availability and by enabling adaptation processes.” The same study supported the view that restricting the per capita density of gambling machines leads to a decrease in gambling harm.²⁴

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

A range of other studies have also indicated a link between the availability of some types of legal gambling and problem gambling. The evidence for the availability hypothesis has been considered by official review bodies in New Zealand, Australia, the United States, and Canada. Each concluded that increased availability of opportunities to gamble was associated with more gambling and more problem gambling.

A later study in the UK acknowledged that decreases in gambling-related problems are a complex process involving not only social adaptation, but also the implementation of public health policies and the provision of specialist services. The adaptation process also seems to be inconsistent across communities; different groups of people are affected differently by the process.

Most reliable research would indicate that there is no single cause which triggers problem gambling. The phenomenon is a result of the combination of several factors, some of which have been outlined in the following diagram. Several of these factors can be influenced by the Council.



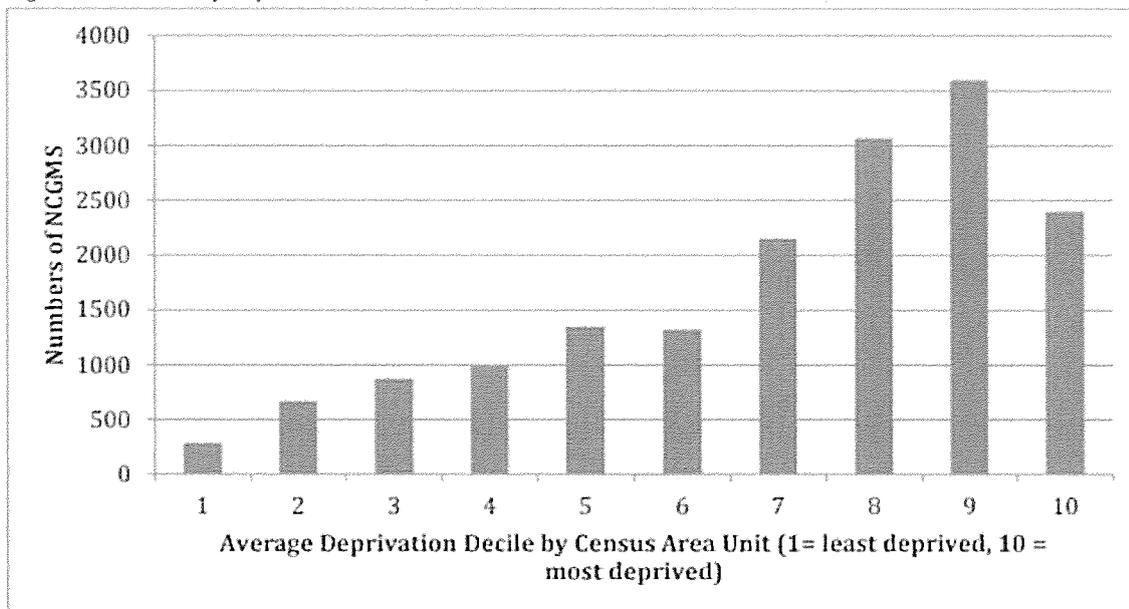
POKIE MACHINES: LOCATION, DENSITY AND DEPRIVATION

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

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

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

Figure 7: NCGMs by deprivation decile, 31 December 2014



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

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

Vulnerability

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

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

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

- Māori populations comprise 31% of intervention service clients²⁹, but make up only 15% of the population.³⁰
- There has been a rise in the number of Māori women seeking help for gambling problems. Māori women seeking help for their gambling problems almost exclusively (85.6% in 2008) cite pokies as their problematic mode of gambling.³¹
- Pacific populations comprise 21.2% of intervention service clients³², but make up only 7% of the population.³³
- Problem gambling strongly linked to mental health state and disorders.³⁴
- Many problem gamblers also use tobacco, alcohol and other drugs.³⁵

THE ETHICS OF GAMBLING FUNDING

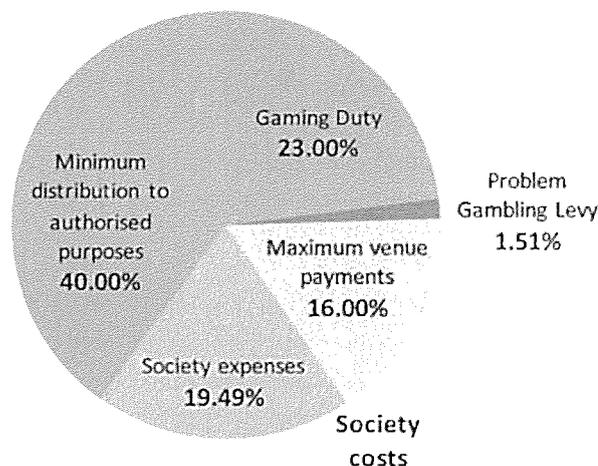
How pokie trusts work

Pokie trusts were established under the Gambling Act (2003) in an attempt to offset harm by returning some of the profits in the form of community grants. Although the purpose of the trusts is to distribute money to the community, the purpose of gambling is not to raise money for the community, and it should not be perceived as such. Pokie machines are licensed to operate in pubs and clubs solely as a form of community fundraising³⁶ and licence holders must distribute their net proceeds to the community by way of grants.

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

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

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



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

While the grants made by community funding bodies like the New Zealand Lottery Grants Board are well documented, no comparable aggregate statistics are readily available for the allocation to authorised purposes of the profits of pokie machines.³⁹

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

Regressive nature of gambling funding

Gambling generates significant funding for community purposes. However, gambling funding comes with a very high human cost and more equitable and less harmful forms of funding should be investigated.

International and New Zealand studies have identified that gambling is sharply regressive. Income is effectively being redistributed away from low income communities.⁴⁰

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

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

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

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

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

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

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

Impact of proposed policy on community funding

Pokie trusts often espouse that many community groups would not survive without pokie money. While it is true that some groups would suffer, pokie trusts account for only 10.2% of charitable giving in New Zealand; as a comparison, personal giving accounts for 58% of charitable giving in New Zealand.

Existing pokie venues are not affected by a sinking lid policy. A sinking lid only prevents new venues from being granted a licence, so the decline in venues and pokies happens gradually. Therefore, a sinking lid policy should not have an immediate or significant impact on community funding.

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

PGF recognises the risks online gambling poses to people with gambling problems. However, pokie trusts often attempt to divert attention from pokies to online gambling. Some pokie trusts have gone so far as saying “a sinking lid accelerates the migration to online gambling” from which communities lose all funding benefits.

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

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

About PGF Group

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

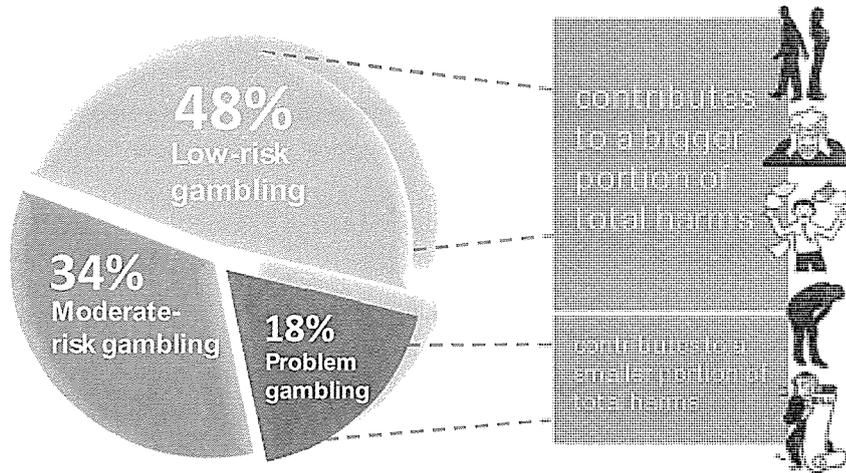
Asian Family Services provides free counselling and support in eight languages: face-to-face, via the Asian Helpline, and also through public health services for the Asian community. Asian Family Services operates from bases in Auckland and Wellington and supports clients working from Hamilton and by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

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

APPENDICES

Appendix 1. Measure of gambling-related harm

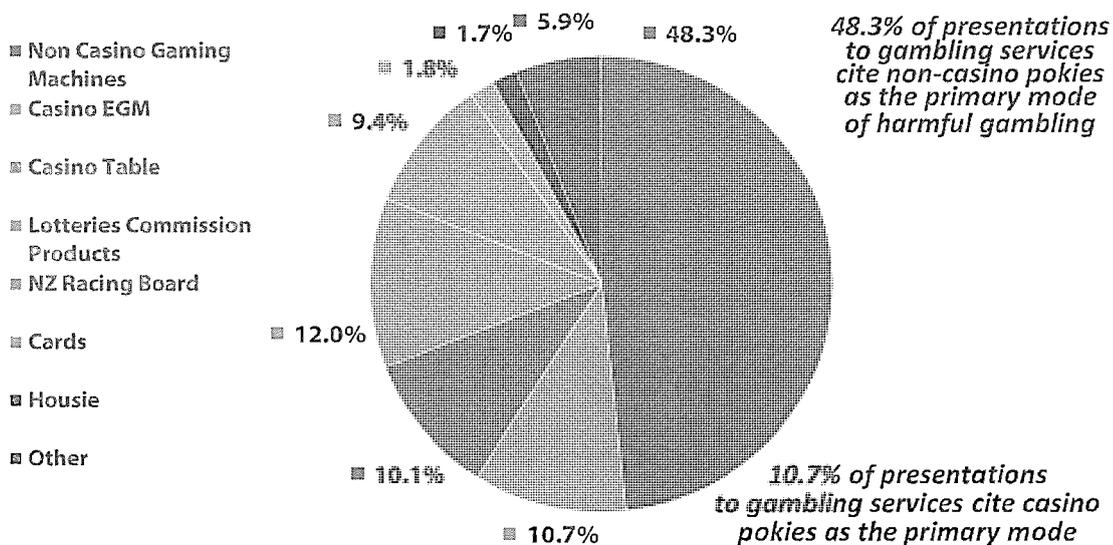
Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.



Appendix 2. Clients assisted by primary gambling mode

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

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



Appendix 3. Gambling expenditure statistics

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

Gambling operators' key financial statistics (actual)

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



Te Tari Taiwhenua
Internal Affairs

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

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

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

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

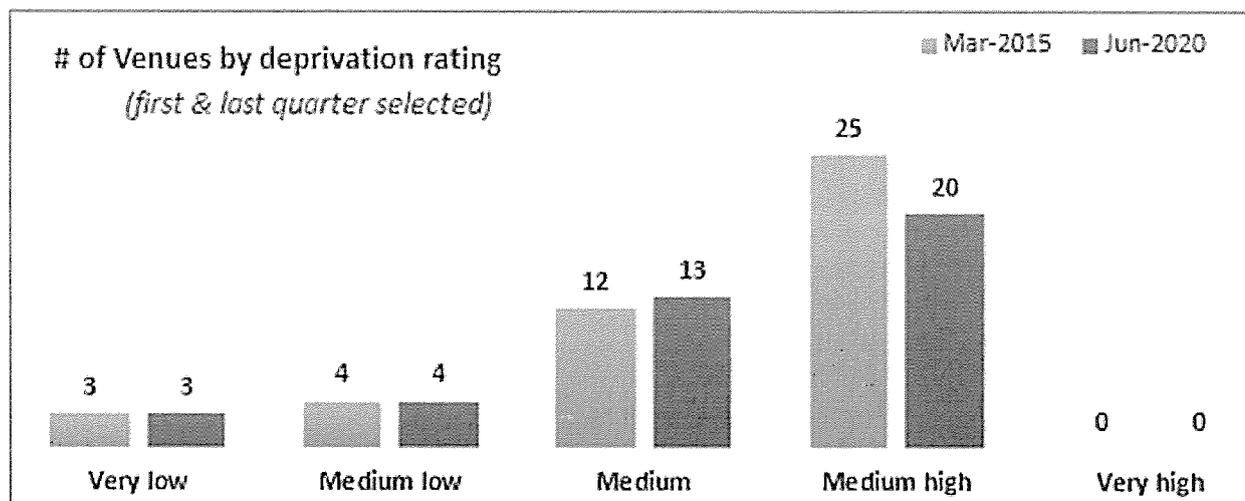
Please disregard previously released gambling expenditure statistics for the above financial years.

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

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

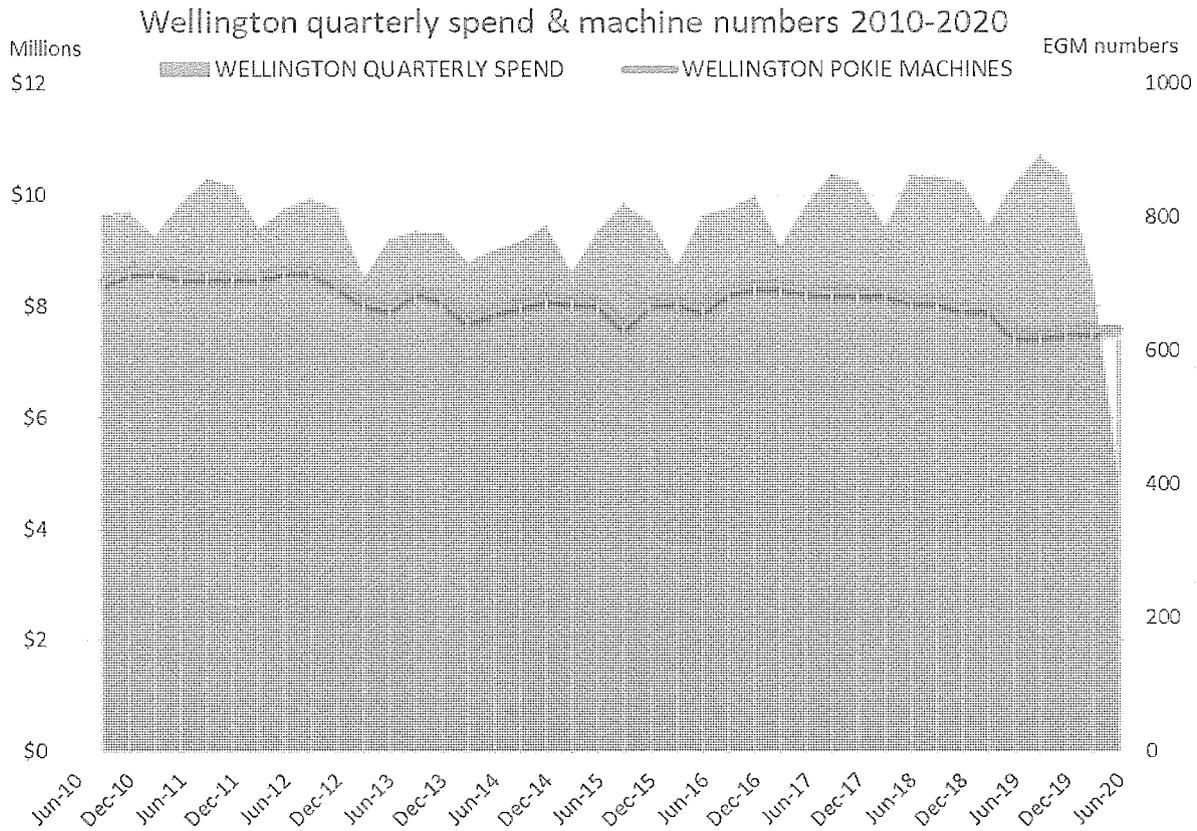
Appendix 4. Deprivation of gambling venue locations for Wellington City

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



Appendix 5. Wellington City quarterly spend vs machine numbers 2010-2020

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



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

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

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

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

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

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

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- ⁷ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ⁸ Abbott, M. W. (2012). Knowledge, views, and experiences of gambling and gambling-related harms in different socio-economic groups in New Zealand. *Australian and New Zealand Journal of Public Health*, 36(2), 153–159.
- ⁹ Moghaddam, J. F. (2015). Suicidal ideation and suicide attempts in five groups with different severities of gambling: Findings from the National Epidemiologic Survey on Alcohol and Related Conditions. *American Journal on Addictions*.
- ¹⁰ Dowling, N. J. (2010). *Children at risk of developing problem gambling*. The Problem Gambling Research and Treatment Centre.
- ¹¹ Dyal, L. T. (2009). *The impact of gambling on Māori. Ngā Pae o te Māramotanga*. Ngā Pae o te Māramatanga.
- ¹² As above.
- ¹³ Shaw, M. F. (2007). The effect of pathological gambling on families, marriages and children. *CNS Spectrums*, 12(8).
- ¹⁴ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*. Auckland University of Technology. AUT Gambling and Addictions Research Centre, prepared for the Ministry of Health. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/research-and-evaluation/implementation-2004-2007/formative-investigation-between-gambling-including-pg-and-crime-nz>
- ¹⁵ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ¹⁶ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*.
- ¹⁷ Productivity Commission 2010, *Gambling*, Report no. 50. Canberra, Australia.
- ¹⁸ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*.
- ¹⁹ Auckland University of Technology. (2017). *Problem Gambling and Family Violence in Help-Seeking Populations: Co-Occurrence, Impact and Coping*. Wellington: Ministry of Health.
- ²⁰ Harrison, B. (2007). *Casinos and regeneration: the story so far, briefing paper no. 1*. London: IPPR (Institute for Public Policy Research, UK).
- ²¹ Per million dollars spent, gambling generates approximately 3.2 jobs while retail produces approximately 6.3. South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide. (2005). *Problem gambling and harm: Towards a national definition*. Victoria: Department of Justice. Retrieved from [http://www.gamblingresearch.org.au/CA256902000FE154/Lookup/GRA_Reports_Files1/\\$file/FinalReportPrinter.pdf](http://www.gamblingresearch.org.au/CA256902000FE154/Lookup/GRA_Reports_Files1/$file/FinalReportPrinter.pdf)
- ²² Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ²³ Abbott, M., Storer, J., Stubbs, J. (2009). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9(3), 225–244.
- ²⁴ As above.
- ²⁵ Allen & Clarke. (2015). *Informing the 2015 Gambling Harm Needs Assessment*. Report for the Ministry of Health, Wellington: Allen & Clarke Policy and Regulatory Specialists Ltd.
- ²⁶ Hancock, L., O'Neil, M. (2010). *Risky business: Why the commonwealth needs to take over gambling legislation* (Alfred Deakin Research Institute). Retrieved from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>; Francis Group. (2009). *Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health Manatū Hauora*;

²⁷ Abbott, M., Bellringer, M., & Garrett, N. (2018). *New Zealand National Gambling Study: Wave 4 (2015). Report number 6*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

²⁸ As above

²⁹ For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>

³⁰ Statistics New Zealand (2019). *2013 Census – Major ethnic groups in New Zealand*. Retrieved from <https://www.stats.govt.nz/infographics/major-ethnic-groups-in-new-zealand>

³¹ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>

³² For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>

³³ Statistics New Zealand (2019). *2013 Census – Major ethnic groups in New Zealand*. Retrieved from <https://www.stats.govt.nz/infographics/major-ethnic-groups-in-new-zealand>

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

³⁵ As above

³⁶ Clubs are permitted to be societies and to operate their own machines in their own clubrooms. They are not required to make grants to other community organisations but can do so.

³⁷ Government also receives tax revenue from gambling taxes and levies which it redistributes for public purposes. NCGM gambling machines are the largest source of tax revenue: 20% tax rate, 1.1% problem gambling levy and GST (Inland Revenue 2006).

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

³⁹ As above.

⁴⁰ Hancock, L. & O’Neil, M. (2010). *Risky business: Why the commonwealth needs to take over gambling legislation*. (Alfred Deakin Research Institute working paper 11). Retrieved from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>; Uniting Care Australia (2009), *Submission to the Productivity Commission Inquiry into Australia’s Gambling Industries*. Retrieved from http://www.unitingcare.org.au/images/stories/submissions/sub_productivity_com_gambling_may09.pdf

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

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

⁴³ As above

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

⁴⁵ Abbott, M., Landon, J., Page, A., Palmer, K., Thorne, H. (2010). *Focused literature review for the problem gambling programme: Final report for the Health Sponsorship Council*. Auckland University of Technology. Retrieved 2013 from <http://www.hsc.org.nz/sites/default/files/publications/HSC-PG-ReviewFinal-Sept2010.pdf>; Doughney, J., Kelleher, T. (2008/09). *Victorian and Maribyrnong gambling: a case of diverted consumer spending. An Unconscionable Business: The Business: The Ugly Reality of Electronic Gambling: a Selection of Critical Essays on Gambling Research, Ethics and Economics*. Cited in Borrell, J. (2009). *Submission to the productivity commission gambling inquiry*. Kildonan Uniting Care: Whittlesea, Melbourne. Retrieved 2013 from http://www.pc.gov.au/___data/assets/pdf_file/0006/87630/sub163.pdf

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

⁴⁷ Adams, P., Brown, P., Brown, R., Garland, J., Perese, L., Rossen, F., Townsend, S. (2004). *Gambling Impact Assessment for Seven Auckland Territorial Authorities. Part One: Introduction and Overview*. Centre for Gambling Studies, University of Auckland. Retrieved from http://www.fmhs.auckland.ac.nz/soph/centres/cgs/_docs/2004adams2_overview.pdf

⁴⁸ Gamblefree Day prompts call for funding boycott. (2011 September 1). *ONE News*. Retrieved 29 January 2013 from <http://tvnz.co.nz/national-news/gamblefree-day-prompts-call-funding-boycott-4378621>; Inglis, S. (2011 August 20). Editorial: Gambling much bigger problem. *Bay of Plenty Times*; De Graaf, P. (2010 July 18). Pub: Ditching pokies worth the gamble. *Northern Advocate*. Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/local/news/pub-ditching-pokies-worth-the-gamble/3917450/>; Thomas, A. (2009 February 16). Rugby – ‘crisis meeting’ resuscitates Mangakahia. *Northern Advocate* Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/sport/news/rugby-crisis-meeting-resuscitates-mangakahia/3795053/>; McNeilly, H. (2008 July 31). Giving up pokie funding right call: Mission. *Otago Daily Times*. Retrieved 29 January 2013 from <http://www.odt.co.nz/news/dunedin/15633/giving-pokie-funding-right-call-mission>

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

Ends.



Ending community sector dependence on pokie funding

White Paper

Updated Friday 17 July 2020

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ABOUT THIS PAPER

PGF Group, Hāpai Te Hauora and the Salvation Army have long been concerned at the reliance many community groups have on grants from pokie trusts or societies to underpin their operations.

Many of these groups share our concerns because of the ethical dilemma it poses for them. The services that these organisations provide are largely essential to many people and they deserve to have certainty and sustainability in their funding providers. The current system of funding from pokies does not provide that surety, relying on a small group of people in our poorer communities putting money into the machines.

A number of important community social services and sporting groups rely on community funding and know that in doing so the money is often coming from the very whānau and communities they are trying to support into wellbeing.

The COVID-19 Level 4 lockdown and the consequent closure of hospitality businesses has starkly highlighted the dependency of community organisations on grants from pokie machine losses in the Class 4 gambling sector.

There is no better time to look at reforming this system for funding community services to give more direction and certainty in a whole of community approach.

At this time, the system needs to be substantially supported. We believe there should be a publicly funded continuation of grant distribution for a year from the time of the beginning of the alert level 4 lockdown and there are a number of ways this could be done.



EXECUTIVE SUMMARY

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

Community	\$120,812,075
Sports	\$120,444,774
Total	\$241,256,849

- Four of those groups received \$1 million in one year. The top recipients in the calendar year 2019 are listed in the table below.

Community	
Supreme Sikh Council of New Zealand	\$4,241,691
New Zealand Flying Doctor Trust	\$2,513,000
Canterbury West Coast Air Rescue Trust	\$1,952,267
Bruce Pulman Park Trust 2018	\$1,947,789

Sports	
Auckland Rugby Union Inc.	\$1,520,000
Waikato Rugby Union	\$897,427
NZ Metropolitan Trotting Club	\$747,677
Bay of Plenty Rugby Union	\$707,914
Auckland City FC	\$639,213

- Problem gamblers contribute between 30% - 60% of the amount paid out in community grants meaning that problem gamblers either lose the amount equal to grants or considerably more: \$282m, \$376m or \$563m.
- Grants in 2019 totalled \$289 million.

- Fifty percent of the 15,476 machines (7,700) are in the most deprived communities (decile 8-10 on the Ministry of Health measurement of deprivation).
- It is estimated that community groups and services would need up to approximately \$60 million to continue uninterrupted services to their communities and the wider public, for six months.
- It is estimated that sports groups would need about \$60 million to continue uninterrupted services to their respective disciplines for six months.
- However, government may want to review the larger Unions' needs in relation to measures they are taking themselves to manage the impact of COVID-19 level 4 and beyond.
- If pokie machine losses were replaced with a government grants programme, four things would be achieved:
 - Community and sports funding would be secured so services can continue to be delivered where they are needed.
 - Losses from the most deprived communities would stop being diverted to national public programmes and national sports interests.
 - Transparency about who gets what money and what it is used for would be provided.
 - Time would be provided to review the whole programme and manage the reintroduction of pokie machines in ways that did not exacerbate gambling harm and is manageable as the COVID-19 levels of lockdown are worked through.

THE POKIE SYSTEM

Trusts and Societies were created to collect gambling proceeds and distribute grants. Together with clubs they make up the Class 4 gambling sector.

There are currently 34 Trusts and Societies holding licenses for the 15,470 Class 4 pokie machines. It should be noted that this excludes the 3078 pokies in casinos and casinos are sited as the largest contributor to problem gambling for the Asian community. A Trust or Society may be based in one location but will have their machines in venues across New Zealand.

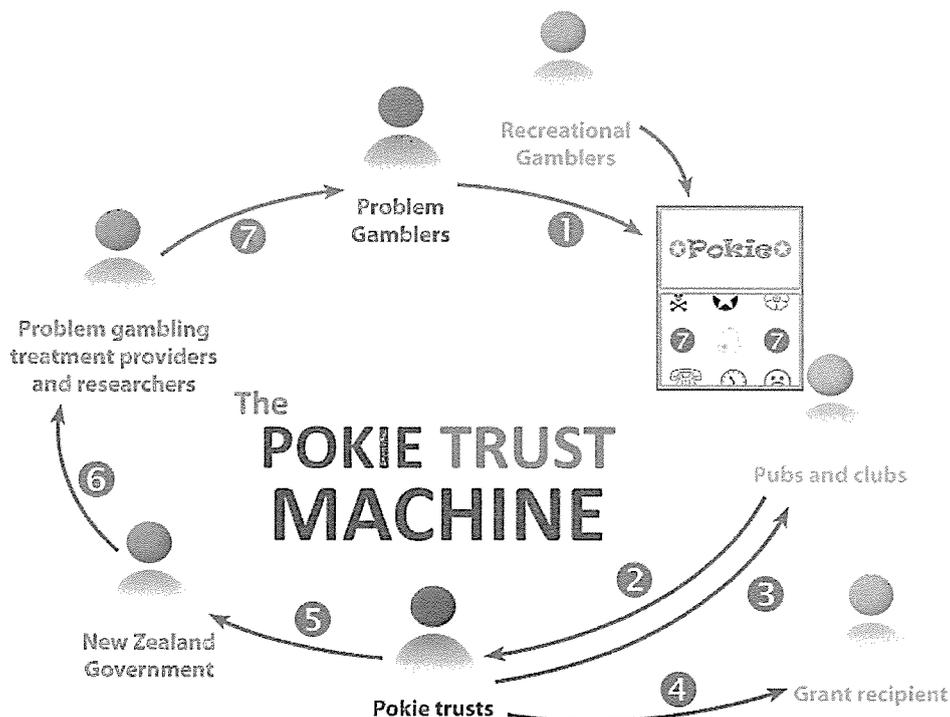
In the 2019 calendar year, Class 4 Trusts and Societies had a surplus of \$124 million¹ to run their operations which largely incur processing, management and machine replacement and maintenance costs.

There are 205 clubs with 2,702 machines reported in Department of Internal Affairs (DIA) gambling statistics who retain all gambling proceeds for the purposes of the club.

At Territorial Local Authority (TLA) gambling policy reviews, the Class 4 sector are well heard and often with legal representation. They are also supported by groups who receive funding in the form of grants. The voice heard the least is that of the problem gambler and their family and community.

There is also significant risk of self-interest and inequity in the system when the Boards of the Trusts and Societies are self-appointed and only accountable to themselves when deciding which groups do and do not receive the proceeds of pokie losses.

¹ Calculated using 40% of ex GST losses for the grants distributed and 16% of the ex GST losses for the venue payment



WHERE IS THE MONEY COMING FROM?

In the 2019 calendar year, \$939 million (GST inc.) was lost in pokie machines in pubs, clubs and TABs (Class 4 gambling).

Only 1.3% of New Zealanders regularly use pub pokie machines¹, and 50% of the 15,476 machines (7,700) are in the most deprived communities (decile 8-10 on the Ministry of Health measurement of deprivation). It is therefore reasonable to conclude that the majority of the money being paid out by Trusts and Societies to community groups is coming from the poorest New Zealanders.

There are a range of estimates on how much of pokie machine expenditure comes from problem gamblers, outlined in the table at Appendix 1. The rate of losses from problem gamblers is at best equal, but most likely exceeds the amount paid out in community grants that go back to the families and communities who lost the \$939 million in 2019.

At whatever percentage, it is evident that community grants come from a small number of people who cannot afford this level of losses and even less so now with the impacts of COVID-19.

We think there should be a publicly funded continuation of the Class 4 system payments for a year from the time of the beginning of the level 4 lockdown. This could be done in a number of ways, but services should get a roll-over to take them through this transition.

In doing so, groups can continue to support communities of interest or specific communities and provide wider population needs where for some time, there will likely be more not less demand.

The DIA estimate that 30% of Electronic Gaming Machine (EGM) expenditure is from problem and moderate risk-gamblers (2016). This is based on self-reported expenditure from National Gambling Study (NGS) participants. Self-reported EGM (pokie) gambling expenditure has historically been shown to be inaccurate.

Published sections of the NGS have already warned that self-reported expenditure does not often correspond to actual expenditure, especially for EGM gamblers². The NGS self-reported EGM expenditure estimates for Class 4 gambling were \$296m in 2012, \$193m in 2013, and \$157m in 2014; the actual expenditure recorded by the DIA was \$854m, \$826m, and \$808m, respectively³. Similarly, an Australian study found respondents in the ACT reported an expenditure that was 45% of their actual spend⁴.

A NZ study relating time and money spent gambling with quality of life measurements noted that their use of self-reported expenditure data likely underestimated losses, and their results would have been stronger if they had an objective way to measure expenditure⁵. Whatever estimate is applied, it is problem gamblers who support the community funding scheme and many of the recipients perform necessary and valuable services to the community and the public of New Zealand.

1 Health Promotion Agency (HPA) 2018. *Kupe 2016: Health and Lifestyles Survey [data file]*. Retrieved from <http://kupe.hpa.org.nz/>

2 Abbott, Bellringer, Garrett, & Mundy-McPherson, 2014, pp. 140-141; Bellringer, Garrett, Kolandai-Matchett, & Abbott, 2015

3 Bellringer et al., 2015, p. 72

4 Australian Institute for Gambling Research, 2001

5 Lin et al., 2010

THE FUNDING MODEL

The money lost on pokie machines is called Gross Machine Proceeds (GMP). GMP is the amount wagered, less the amount paid back as prizes. The money collected is applied in a complex model before it can be distributed in grants.

Venue Payments A Trust can pay up to 1.28% of the venue's turnover that week to a venue as commission, meaning higher earning venues can be paid proportionately more.

Prior to 2016, venues were paid on a fixed rate. Payments to all venues across the financial year must still not exceed 16% of losses for that year.

Problem gambling levy The levy is 0.78% of GMP and funds treatment services, public health and research.

Trust Operating Costs These must be kept as low as possible and only used for "reasonable" costs. The true proportion will be unique to each Trust based on their grant contributions etc. but estimated at 20%.

Regulator fees Fees are 3% and are paid to the Department of Internal Affairs.

Gaming duty Duty is 20% (GST inclusive, paid to the Crown): Section 12C of the Gaming Duties Act 1971.

Community grants Grants must be 40% of GMP but Trusts can pay more.

The table at Appendix 2 details the source of GMP and the amount distributed in grants for the year ended December 2019. The Department of Internal Affairs publishes GMP figures quarterly.

GRANT DISTRIBUTION

In the year to December 2019, a total of 13,000 organisations received approximately \$241 million in grants (according to the PGF Group grants analysis system which uses discoverable published grants lists from the gambling societies and trusts rather than the theoretical figure of 40% of GMP).

PGF categorises grants into community services, community groups and sports groups.

Community services are classified as groups that provide paid and volunteer services. Community groups are classified as groups that service a discreet population and include faith-based groups but also include arts societies and some research groups.

Sports groups include everything from large Unions to local tennis clubs and children's sports. Grants are generally shared 50/50 between sports groups and community groups and services.

For grant recipients, many of which support laudable causes and communities, the Class 4 community funding programme represents revenue of between \$250 million to \$300 million per year. Few community recipients can see any alternative to meet their revenue needs.

2019 calendar year grants split

Community	\$120,812,075
Sports	\$120,444,774
Total	\$241,256,849

CLASS 4 GRANTS FOR COMMUNITY SERVICES

The types of community groups that benefit from Class 4 funding include amateur dramatics, arts groups and recreational groups outside clubs.

It also includes health, mental health and social services groups, often working with vulnerable people and communities. Other groups might include groups like those involved in public-benefit research but who aren't providing any services, for example some medical researchers.

The community services which benefit from the community funding scheme are all services which the whole of the New Zealand public benefit from either directly or indirectly.

The existence of an ambulance service, for example, may not be used by each of us, but that it is there for those who do, is a benefit to all New Zealanders.

These groups of beneficiaries are more difficult to plan for because they are often small and are only known in their immediate communities.

A way of dealing with this is to provide more government support to the Community Organisation Grants Scheme (COGS). An alternative model is to utilise the regional community foundations.

Government guidance could be provided for the philanthropic sector on applications and criteria but recognising these programmes often service valuable niche and localised organisations. At current grant levels the funding programme would be about \$60 million per annum. Community group dependency is significant.

A categorised list of community funding recipients can be found at Appendix 3.

CLASS 4 GRANTS FOR SPORT

Approximately \$120 million, or about half of the money raised through the Class 4 community funding scheme, goes to sports.

National sports bodies and community sports groups are now highly dependent on Class 4 gambling losses. This dependency, in terms of the history of New Zealand sport is relatively contemporary.

While there may be long standing relationships and "rollover" application processes in place between some sports groups and some Trusts or Societies, this is not the case for all. For some groups the annual and uncertain application cycle limits development.

A categorised list of sport funding recipients can be found at Appendix 4.

IMPACT ON TAX COLLECTED

The benefits to government from gambling losses are made up of the:

- GST collected
- gaming machine duty and levy, providing problem gambling services and research
- community funding not demanded from Vote

The GST is a function of money spent and it seems very reasonable to assume that if the money spent on pokies in Class 4 was not spent there, it would be spent elsewhere, and with the possibility that a multiplier effect would see revenue to the government increased.

The gaming machine duty is an income/turnover tax proxy. As such, this may equal the amount of income tax the government

collects through businesses paying income tax on the level of income that would have been spent on pokies (ex GST). This approximation may overstate or understate the tax take by the government from taxable business activity.

A multiplier effect may act in the government's favour in this regard if the money was going through non-pokie businesses. The levy is derived from gambling losses and is a function of the size of the problem. Gambling treatment services are not taxpayer funded.

Government dependency is not significant with opportunity money spent for the tax gathered from losses, to be spent on other consumables.

COVID-19

The grants system on which valuable community services survive is based on the assumption that it is acceptable for a small proportion of New Zealanders living in the poorest communities to lose money in support of a national benefit. Many community groups would rather not take pokie funding to deliver their programmes but have no other option.

There is little transparency about the application process and who gets what grants. In addition, some Trusts and Societies are approving grants from proceeds of pokie losses gathered from areas outside of which the community group may be operating. The Class 4 funding system may be seen as a way to keep the hospitality industry afloat at the time of this pandemic. The Gambling Act (2003) prohibits venues operating as pokie dens (section 69A(e) and 70 (1) (i)).

As lockdown levels change and pubs are permitted to operate, the license conditions for pokie machines must be maintained and monitored. If a pub with pokies does not reopen, then the machines cannot be moved to another location if the TLA gambling policy prohibits this. Nor can alternative venues increase their number of pokie machines, if the TLA policy precludes this.

Of note also is that gambling policy reviews are subject to TLA public consultation processes. As 50% of pokies are in the poorest areas in New Zealand and these areas are likely to be in need of significant COVID-19 income support for the foreseeable future, it would make sense to ensure that gambling harm is not further exacerbated, despite the need to support community and sports groups.

AN INTERIM SOLUTION

Pubs and clubs face a long and uncertain future before revenue streams return. Even if pubs return to some normal operation it is likely that social distancing rules for various levels of lockdown may preclude some or all pokie machines operating in the same way.

Both limited patronage and the limited number of machines able to be used at any one time will impact on gambling losses. This is positive. However, it will also flow into less revenue for the community grants programme.

Most Trusts and Societies have suspended grants, effective from COVID-19 alert level 4 lockdown.

An interim solution is for the Government to directly fund current community and sports grant recipients as part of its COVID-19 support packages. This could be done for a six month period while the whole programme is reviewed.

It is estimated that community groups and services would need up to about \$60 million to continue uninterrupted services to their community groups and wider public, for six months. This will cover the period of level 4 lockdown through to September 2020.

It is estimated that sports groups would need about \$60 million to continue uninterrupted services to their respective disciplines for six months. However, government may want to review the larger Unions' needs in relation to measures they are taking themselves to manage the impact of COVID-19 Level 4 and beyond.

If pokie machine losses were replaced with a government grants programme several things would be achieved.

Firstly, community and sports funding would be secured so services can continue to be delivered.

Secondly, there would be transparency about who gets what money and what it is used for. This does not mean that funding would only go to approved government projects but does mean there can be some equity oversight.

Importantly, losses from the most deprived communities would stop being diverted to national interests.

Finally, this will provide time to review the whole programme and manage the reintroduction of pokie machines in ways that does not exacerbate gambling harm and is manageable as the COVID-19 levels of lockdown are worked through.

ABOUT THE AUTHORS

PGF Group

The Problem Gambling Foundation is now trading as PGF Group, with Asian Family Services, Mapu Maia Pasifika Service, and PGF Services, part of this overarching brand. The organisation is a Charitable Trust operating nationally with services delivered under contract to the Ministry of Health (MoH) and funded from the gambling levy.

Established in 1988 as the Compulsive Gambling Society, the organisation started out as a telephone service then expanded to include face-to-face services as demand grew. In 2001, the Problem Gambling Foundation succeeded the Compulsive Gambling Society and today, we deliver treatment and public health services nationwide. We have a skilled and diverse workforce with staff who are qualified in clinical work and in health promotion.

PGF Services provide free counselling, advice and support to gamblers and their families and work to ensure that support for our Māori clients fits a kaupapa Māori way of working. Our specialist teams provide culturally and linguistically appropriate support to Asian and Pasifika communities living in New Zealand.

Hāpai Te Hauora

In 1996, Hāpai Te Hauora Tapui Ltd (Hāpai) was established as a regional provider of Māori public health services in the greater Auckland region. Hāpai was created from a tripartite Memorandum of Understanding between Te Rūnānga o Ngāti Whātua, Raukura Hauora o Tainui and Te Whānau o Waipareira Trust Board. The subsequent arrangement provided an integrated and collaborative entity that cemented regional Maori public health services in one place for Tāmaki Makaurau.

The mission and vision of Hāpai is to increase opportunities for Māori to enjoy good health and to be sustained by healthy environments. This is done by providing a strategic focus that is underpinned by our values, evidence based research, innovation and leadership for the advancement of health and well-being for all. Work is undertaken regionally and nationally to address health inequities and provide strategic solutions for long term outcomes across all areas of well-being.

The Salvation Army Oasis

For over two decades, The Salvation Army has provided help to those impacted by harmful gambling. The Salvation Army Oasis was formally established in June 1997 in Auckland in response to growing evidence that the proliferation of gambling opportunities was having a negative impact on society. Prior to this in 1992 and 1995, services to support gamblers were established in Wellington and then Christchurch after the opening of the Christchurch casino. Consequently, the Army's reducing gambling harm services have expanded to seven regions across New Zealand.

We are funded by the Ministry of Health to provide preventing and minimising gambling harm clinical and public health services. We have a diverse team of professional and clinically qualified and registered counsellors and public health practitioners. Our team support and encourage wellbeing and reduce gambling harm through education, self-reflection and creative and research based therapies. Public health workers provide accurate information and education to raise awareness and support community and professional groups, services and Government to be free from gambling harm.

APPENDICES

Appendix 1: Problem gambler contribution to annual GMP

Rate of problem gambler contribution to losses	2019 Losses	2019 Grants (40% of 2019 Losses less GST)	Contribution from problem gamblers
30% Department of Internal Affairs	\$939 million	\$292 million	\$282 million
40% Australian Productivity Commission minimum	\$939 million	\$292 million	\$376 million
60% Australian Productivity Commission maximum	\$939 million	\$292 million	\$563 million

Appendix 2: 2019 GMP Sources and Distribution of Grants

2019 Calendar Year	\$ Millions	Non-club Class 4 operating payments
Class 4 losses	939	
Club losses	98	
Non-club losses	841	
GST on non-club losses	110	
Non-club losses less GST	731	
GST exclusive Machine duty (23%)	168	
Non-club tax paid losses	563	
Grants (40% ex GST losses)		292
Venue payments (16% ex GST losses)		117
Levy (0.78% ex GST losses)		6
Fees (3% ex GST losses)		22
Total gambling society operating payments	437	437
Gambling society surplus to run the trust	126	
Percentage of ex GST paid losses available to trust	17%	

Appendix 3: 2019 Community Services and Community Groups sub-categories

Community groups	\$37,838,195
Education	\$23,466,718
Arts	\$12,952,443
Health related	\$10,446,792
Community services	\$10,420,915
Faith based	\$6,819,355
Search and Rescue (excluding surf clubs)	\$6,656,072
Māori	\$5,092,069
Kindergartens/Childcare/Plunket	\$2,452,638
Ambulance services	\$2,401,716
Council	\$1,516,343
Fire Services	\$748,819
Total	\$120,812,075

Appendix 4: 2019 Sport Groups sub-categories

Rugby	\$19,982,236
Other sports	\$19,861,454
Soccer	\$11,295,064
Cricket	\$8,908,166
Water sports	\$8,046,758
Racquets	\$6,012,940
Sports stadiums/academies/events centres	\$5,478,896
Hockey	\$4,757,123
Basketball	\$4,743,441
Netball	\$4,524,828
Surf lifesaving clubs	\$4,438,863
Bowling	\$3,431,502
League	\$3,179,766
Racing	\$2,861,218
Cycling	\$2,695,279
Special Olympics/sports for the disabled	\$2,433,512
Gym sports	\$2,341,199
Softball	\$1,766,541
Athletics	\$1,412,553
Equestrian/pony clubs	\$1,303,274
Motorsports	\$970,161
Total	\$120,444,774



ROYAL NEW ZEALAND BALLET

A submission to Wellington City Council on the proposed renewal of the Gambling Venues Policy, under the Gambling Act 2003

This submission is made by Lester McGrath, Executive Director, and Susannah Lees-Jeffries, Director of Marketing and Development, on behalf of the Board, staff and artists of the Royal New Zealand Ballet.

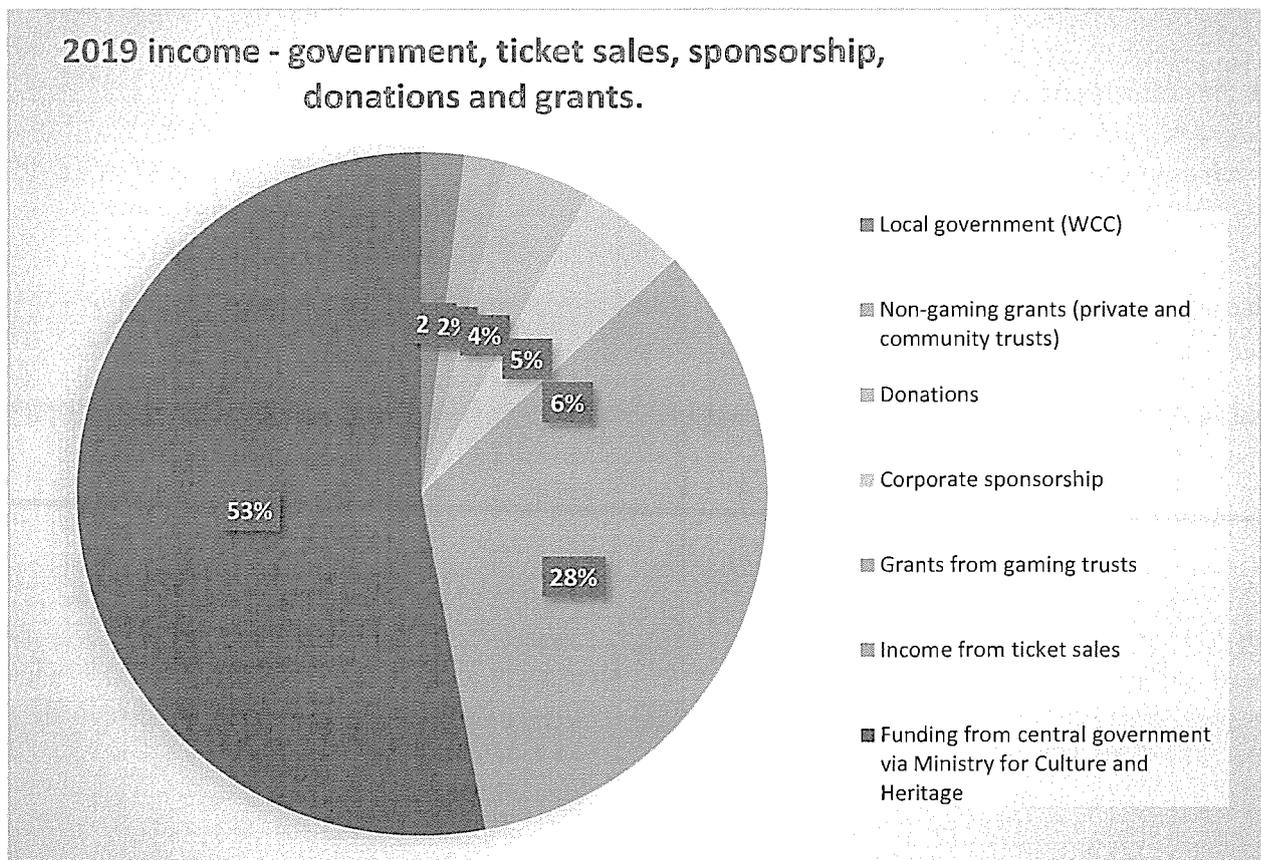
We would be pleased to make an oral submission in support of this written submission.

1. The Royal New Zealand Ballet greatly appreciates Wellington City Council's commitment to supporting the arts in Wellington through both the long-term plan and the arts and culture grants programme.
2. We know that WCC recognises the value of the local and national arts and events sector in making Wellington a vibrant place to live, a popular destination for visitors from around Aotearoa, and a major employer in our city. We would particularly like to acknowledge and thank WCC for its inclusion of arts, culture and events as eligible for support through the City Recovery Fund as our sector grapples with the effects of the COVID-19 pandemic.
3. Like most of our colleagues in the arts and events industry, the Royal New Zealand Ballet is a charity, and relies on diverse sources of income in order to deliver a local and national programme of performances, community events and accessibility initiatives.
4. Over the year ending 31 December 2019, the Royal New Zealand Ballet received grants of \$587,500 from gaming trusts. This represented just under 6% of our total operating budget for the year, and in fact, after funding from central government and income from ticket sales, grants from gaming trusts are our third largest source of income. This proportion has been consistent for the last decade.
5. As can be seen from the breakdown below, the Royal New Zealand Ballet is fortunate in being able to generate income from a wide range of sources. However, there can be significant fluctuations in earned income from year to year, and this variation is largely outside the control of the RNZB.
6. Of the six gaming trusts which made grants to the RNZB in 2019, five (Pub Charity Limited, the Lion Foundation, NZCT, the Four Winds Foundation and the Pelorus Trust), totaling \$558,000 helped to fund our activities in the Wellington region.
7. In 2019, activities and initiatives directly funded by grants from gaming trusts included:

- Contributions to the RNZB's outgoings in running the company's office and studio premises at the St James Theatre and latterly at the RNZB Dance Centre and the temporary offices on Willeston Street.
- Contributions to venue hire (The Opera House) in Wellington and nationally, and to local and national equipment hire and freight costs.
- Contributions towards the salary of a full-time dance educator and our Education and Community Manager, working on programmes including dance workshops in Rimutaka Women's and Men's Prisons, workshops in schools and school holiday workshops and free family performances at Te Papa. Activities at Te Papa included special 'relaxed performances' for children on the autistic spectrum and their families, engaging with Wellingtonians who often feel excluded from regular performances and arts events.
- Subsidised transport for children from low-decile schools to attend the schools' matinee of *Hansel & Gretel* at the Opera House.

8. It is reasonable to ask whether the activities supported by gaming trusts could be funded from other sources. The RNZB submits that were income from gaming trusts were to drop or disappear a wholly new source of funding would need to be established to replace this vital revenue source.

9. In the case of the RNZB the table below shows the various sources of revenue which support our annual programme.



10. Corporate sponsorship is difficult to secure – something which is unlikely to change in the present recessionary environment – and may take years to develop. We are limited by the size of the potential pool of companies with the financial capacity and wherewithal to engage in sponsorship, both in Wellington and in New Zealand as a whole, and by the exclusivity demanded by all sponsors within their industry sector. Activities currently supported by gaming trust revenue are unlikely to appeal to corporate sponsors as they are not easily able to generate tangible commercial benefits.
11. The present reliance on the Opera House as our sole performing venue in Wellington also makes the development of new corporate investment challenging, as sponsors are reluctant to host clients or undertake customer-facing activations in such an inadequate venue.
12. Community trusts are oversubscribed, and in Wellington in particular, have limited resources. We have seen a welcome growth in donations from personal supporters in recent years, but this income currently corresponds to just two thirds of the income received annually from gaming trusts. The current COVID-19 recessionary operating environment is seeing increased pressure placed on community trusts to support charities providing social services for people in need.
13. We are working hard to increase private donations and have had some success. Our percentage of funding from private donations is double that achieved by most other performing arts organisations. However, it is unrealistic to think that we can grow private philanthropy by 150% to cover the potential loss of revenue provided by gaming trusts.
14. The arts, events and sports sectors are under great financial pressure. Our ability to earn income from ticket sales is severely compromised in the COVID-19 environment, particularly when restrictions on public gatherings at events apply. There is also a limit to what we might be able to earn at the box office or from other commercial activities in the longer term.
15. We do not believe that there are at present new funding models, or untapped sources of funding for us to explore, although these would be required if funding from gaming trusts was to diminish or dry up.
16. The RNZB notes WCC's concern that Class 4 gaming machines promote problem gambling, hence the desire to reduce the number of machines in the community. The RNZB submits that removing gaming machines will not reduce gambling per se and points to the dramatic increase in online gambling in recent years, where profits are not returned to support local charitable activities but go offshore.
17. The RNZB would like to see a more consistent regulatory framework across the board if there is a desire to tackle problem gambling, with adequate and sustainable replacement funding established for beneficiaries of grants from gaming trusts
18. Until that time we ask that Wellington City Council does not add to the uncertainty and financial strain facing many arts, community and sports organisations by reducing the availability of funding from gaming trusts in Wellington through the adoption of a sinking lid policy.



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Wellington City Council
Gambling Venues Policy
P O Box 2199
WELLINGTON 6140

1st October 2020

**RE: WELLINGTON CITY COUNCIL GAMBLING VENUES POLICY -WELLINGTON HOCKEY
SUBMISSION**

INTRODUCTION

Thank you for giving Wellington Hockey the opportunity to provide feedback on the above policy.

This submission is on behalf of Wellington Hockey and our affiliated clubs and outlines our views on the proposed changes to the Gambling Venues Policy.

The preferred position of the Hockey Community is Option C – No changes to the current arrangements relating to gaming machines and venues in Wellington.

BACKGROUND

Wellington Hockey is based at the National Hockey Stadium in Berhampore where we have three Hockey turfs that are the hub of our community.

We provide Hockey opportunities to more than 4,000 Hockey players, 49 clubs, colleges and schools in the Wellington Region.

Our clubs that are based in the Wellington City Council area are as follows:

Island Bay Hockey Club
Wellington Indians Sports Club
Brooklyn Geckos
Northern United Hockey Club
Harbour City United Hockey Club
Karori Hockey Club
Karori Junior Hockey Club
Tawa Titans Hockey Club

Tawa Junior Hockey Club
Victoria University Hockey Club

Wellington Hockey prides itself on its vision and mission which are:

Vision: Inspiring a lifelong love of Hockey

Mission: Making great Hockey happen

Our strategy statement is as follows:

WHA is a trusted, reliable community partner. We are here to support our community.

Benefits of Class 4 gaming to the Hockey Community

The community funding model currently used to distribute Class 4 gaming is working well.

The money we receive goes directly back to our community to ensure that our members can continue to enjoy the sport they love at a reasonable cost.

If the Wellington City Council introduce a sinking lid policy to gaming machines, the amount of money our community can access will diminish over time. This will have a negative impact on what we as a Regional Sports Organisation can offer our community as well as what our clubs can offer their members.

Currently some of the areas Class 4 gaming is helping the Hockey Community are:

- Support for our power bills – we pay approx. \$60,000 per year in electricity with the majority going on floodlights.
- Community programmes – funding we receive enables us to go into schools and introduce children to Hockey and provide Have a Go opportunities for many.
- Contributing towards salaries, wages – we simply would not exist without the support received in this area.
- Helping with the costs of our representative teams travelling to tournaments – without this support there would be many children who would not be able to participate.
- Facilities – many upgrades to our facilities would not be possible without funding support.

Many of our clubs apply for Class 4 gaming to help towards their training and game fee costs.

This money is passed on to Wellington Hockey to help cover the cost of the lease fees charged by Wellington City Council for the hire of the National Hockey Stadium. This cost in 2020 was \$110,000.

Any reduction in Class 4 gaming proceeds will have two significant outcomes:

- Cost will become a barrier to participation which will result in a decline in people being able to enjoy our sport
- The ability for Wellington Hockey and its clubs to be able to continue to pay for its facilities will be put under extreme pressure

SUMMARY

Whilst we acknowledge that the impact of problem gambling can be significant in the community, we also believe that the social benefits of sport and the people that we can impact cannot be underestimated.

We see on a daily basis the importance of sport to people's health and wellbeing, and want to be able to keep providing this to our community without any more financial pressure than we already experience.

CONCLUSION

Wellington Hockey requests that the Wellington City Council retains the status quo – Option C on the Gambling Venues Policy.

The impact that Class 4 gaming money can make on the Sport and Recreation sector, therefore on the health of Wellington's population cannot be put at risk by choosing any other option.

Our submission is available on our website (www.wellingtonhockey.org.nz) and shared with our members.

Kind regards

Lisa Jones
CEO, Wellington Hockey

With support from Hutt United Hockey Club



Submissions to the WCC Class 4 Gambling Policy

October 2020

Pub Charity Limited
190 Taranaki St
Wellington

Contact – Martin Cheer (0274) 715 745

Introduction

My name is Martin Cheer and I am the CEO of Pub Charity Limited (PCL), which along with its predecessor, has operated gaming machines in New Zealand and Wellington continuously since 1987.

PCL currently operates one venue with 18 machines in Wellington City and 4 venues with a total of 72 machines across the wider Wellington region.

PCL supports the status quo for Wellington’s Class 4 Gambling Policy and rejects calls for a sinking lid.

PCL wishes to speak to its submissions.

Conflicts of Interest

I attended the recent subcommittee meeting that briefly discussed the draft policy. I was surprised when a group of councillors rejected the WCC policy recommendation and proposed a sinking lid as the preferred option.

The Committee Chair did not address the issue of Conflicts of Interest, nor canvas Councillors to determine if any such conflict existed, despite a number being significantly involved in organisations that receive Class 4 Gaming funding.

In addition to that failure, I became extremely concerned when Councillor Rebecca Mathews thought it appropriate to take a ‘selfie’ prior to that meeting, with the CEO of the anti-gambling lobby group and promoter of sinking lid policies, Paula Snowden from the Problem Gambling Foundation (PGF), which she then posted. (see page 2)

Such bias evident in Councillor Mathews and others, shows an organised group with an obvious conflict of interest. Best practice governance is to have them stand aside from any related policy decision.



Submissions

The Councillors in the sub-committee hearing heard verbal evidence that experts within the problem gambling sphere have rejected the suggestion that sinking lids on physical gambling opportunities reduce gambling harm (even before the emergence of online and social media-based gambling)

In what was clearly a predetermined position from a number of Councillors, they then favoured and accepted anecdotal testimony over actual empirical evidence from Government agencies and Gambling Harm experts.

In what now verges on urban myth, Councillors were told a sinking lid would;

Reduce gambling activity and spend

Reduce problem gambling

and in addition, would;

Divert economic activity into retail that would result in an increase in employment.

On that basis, the majority of Councillors felt a sinking lid on Class 4 Gambling was the preferred policy option. As a regular participant in these policy discussions since 2005, I always hope that elected officials would bring mental rigour and independent thinking to policy decisions involving public health, consider all stakeholders, and avoid personal bias and blinding political ideology.

Unfortunately, that is often not the case.

For the Record

There is clear and established evidence since 1998 that a reduction in Class 4 Gaming Venues and Gaming Machine numbers;

- **Does not reduce gambling activity and spend**
- **Does not reduce problem gambling prevalence**

In fact, evidence suggest the unavailability of controlled and supervised gambling spaces encourages the migration of people to offshore online gambling either directly or thru social media

Gambling Spend

Local and Central Government policies since 2004, have resulted in substantial declines of gaming machine numbers, from 25,000 to less than 15,000. Combined with population growth, this reduction has seen the ratio of machines to adult population reduce by 50%.

Based on the assertion put forward by those proposing a sinking lid policy, both Gambling Harm and spend should have declined substantially. This is the justification that Councillor Mathews et al based their decision to support a sinking lid.

The evidence says otherwise. Please note the graph below does not consider the On-line Gambling market or 'Other Gambling' spend for New Zealander's, which has grown to a DIA estimated \$381M for the 18 months prior to August 2019 and continues to grow since especially through the COVID-19 lockdown. Lotteries products and TAB are also not included below.

'Control the growth of gambling ...'



Problem Gambling

Ms Snowden from the Problem Gambling Foundation proclaimed sinking lids to be, *'one of the most effective means of reducing harm'*. So convinced was she of her argument, and perhaps her audience, that she then offered absolutely no evidence to support her claim, or why it conflicts with evidence from Problem Gambling researchers.

Now disgraced researcher Professor Max Abbott, globally recognised expert on Problem Gambling (his misdemeanours did not relate to his research findings) is on record as saying;

'EGM reductions and introductions of caps generally appear to have little impact ... more recently, in some jurisdictions, that have experienced prolonged and increased availability [of gaming machines], prevalence rates [of problem gambling] have remained constant or declined. ...'

PG Researcher Professor Max Abbott, (formerly) AUT

What does Ms Snowden or Councillor Matthews know that Professor Abbott missed?

Again the empirical evidence from Government agencies does not support Ms Snowden's anecdotal urgings.

'Minimise harm ...'



The Ministry of Health has reported the following for a number of years, completely contradicting Ms Snowden's argument.

'It is concluded that there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006.

It is considered likely that the prevalence of problematic gambling, both current and lifetime, within the range assessed as pathological, problem and moderate-risk, reduced significantly during the 1990s and has since stayed at about the same level.

The above conclusion is consistent with the findings of a recent meta-analysis of prevalence studies conducted world-wide since the late 1980s; in all major world regions examined prevalence increased in association with increased gambling availability, especially casino gambling and EGMs, then levelled out and declined' –

NZ Ministry of Health 2015

So what does Ms Snowden and Councillor Matthews know that the Ministry of Health does not ?

Why do the actual statistics for Problem Gambling prevalence in New Zealand NOT reflect the materialised benefits promised by Councillor Mathews and Ms Snowden?

Councillor Mathews is not alone and Ms Snowden's deliberate misinformation campaign is spread far and wide. Here is as comment from Hasting CC;

'The availability and accessibility of gambling opportunities was one of the strongest predictors of problem gambling.

"Put simply, there is a general consensus that increased gambling availability has resulted in an increase in problem gambling" – Hastings CC'

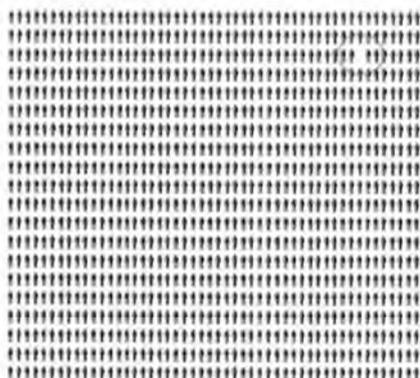
Clearly both statements, when based on the actual evidence, are wrong!

The Actual Size of the Problem

Councillor Fleur Fitzsimons is on record as saying;

'The Council had a responsibility to use its powers to regulate and to reduce harm, and support residents.

Problem gambling is tearing families apart in Wellington, so I support a sinking lid as one small step to reducing gambling related harm.'



PROBLEM GAMBLING

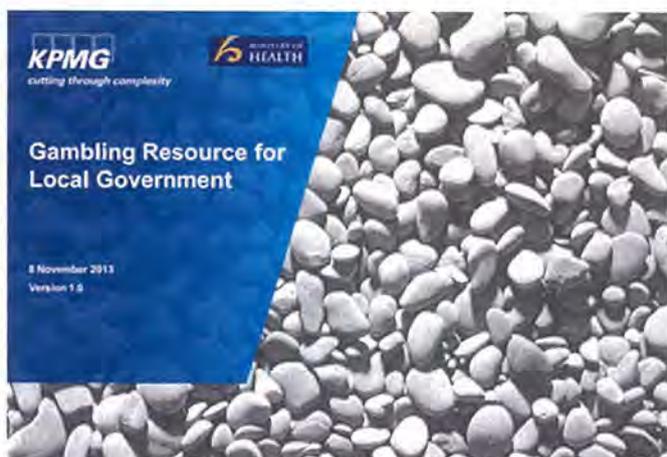
- INCIDENCE RATE IN NZ
- 0.1% (PGSI)
- PREVALENCE RATE 0.3%

Problem Gambling affects a relatively small cohort within the general population and the majority of those affected have high levels of co-morbidity with other mental and personal issues. In many cases Problem Gambling behaviour is not causative but associative. Even if community Gambling was the only gambling option (which it's not) people would be experiencing poor health outcomes anyway.

Unfortunately, the millions in the Health Budget given to Ms Snowden's PGF from a levy on gambling proceeds, appears to be mostly wasted, not on health interventions but on blatant politicking.

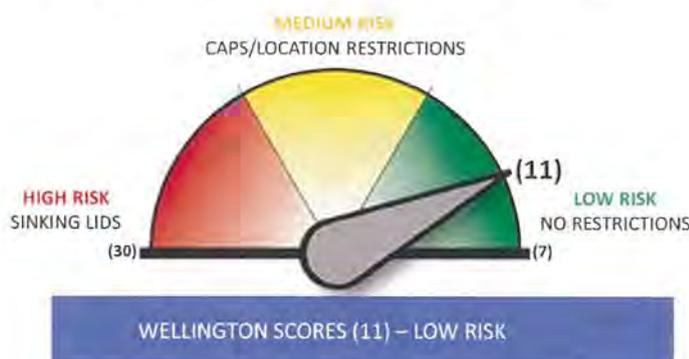
The KPMG/DIA/MoH Assessment Tool

In 2013, in a measure designed to improve and standardise independent advice to Local Government, the DIA and MoH commissioned KPMG to build an analytical tool to assist TLA Policy Staff and Councillors measure Gambling Harm in their Communities and give clarity to the extent of possible problems to be addressed when reviewing Gambling Policy .



The tool inputs data from the DIA, MoH and Statistics NZ for Gambling Machine density, help seeking, expenditure per head of population, ethnic diversity, community deprivation, and availability of services, and to assess risk within a TLA.

Wellington City scored 11 - Low risk with little policy restrictions required.



Economic Impact

Ms Snowden made much of the economic cost of money spent on Class 4 Gambling and tabled a report from the NZIER suggesting Gaming spend diverted into retail would create 1,200 jobs and produce a net amount of economic benefit.

Ms Snowden again chose to be selective in her advice to Council.

In a disclaimer in the NZIER Report, the author clearly states that no attempt was made to quantify the economic benefit of the money being spent in local businesses, employing local people and funding local organisations. (see attached Press release from GMANZ)

Employment alone in Class 4 Venues linked to their Gaming operations, employs an estimated 2-3,000 people. The Net Proceeds and Tax result in thousands more jobs as well in Retail and Service activity.

There is also a major flaw in the thinking that spending would migrate to local retail when it has been shown during COVID lockdowns to migrate to offshore Gambling with no economic benefit to New Zealand as per the following article:

Covid-19: Salvation Army worries about rise in online gambling sites

10:10 am on 4 April 2020

The Salvation Army's gambling addiction support service is worried about the increased number of online gambling sites.

The head of the organisation's gambling services division, Oasis, said it had been noticeable since the nationwide lockdown came into force.

Lisa Campbell said the rise in the number of unregulated overseas online gambling websites had coincided with the closure of pokie venues and casinos, and online availability of New Zealand Lotto and TAB services.

Online gambling companies were now advertising on social media, possibly because they saw people in isolation as a captive audience, Campbell said.

The ads for overseas gambling websites were cropping up frequently when she was on Facebook in a private capacity, she said.

She was concerned that the tailored nature of how social media advertising worked, meant that others, including at-risk gamblers, were getting the same ads.

"I'm concerned they're using this opportunity to bring people into online gambling now, which is pretty awful to see that happening.

"I am sure they see social isolation as a great opportunity to expand business without any thought for the additional harm this could cause, further exacerbating the financial and mental harm on people already."

Oasis was now compiling information on online blocking tools that people can use to block internet gambling sites, Campbell said.

"We have heard from some clients who say they are really concerned about how they will cope, both financially and practically, at home with family or alone during the lockdown period, and are feeling very anxious, and some have asked for more support than normal."

Campbell said similar advertising was apparent before the lockdown but she was now seeing it more frequently.

Lotto and TAB were the only legal online providers of gambling, she said.

"They have said they're stopping advertising around the scratchies and other products during this time, so they're only advertising Lotto.

"The bigger concern is the overseas gambling websites where there's no regulation, which are potentially the biggest problem for us."

Summary:

PCL supports the status quo for the WCC Class 4 Gambling Policy.

Best practice governance requires those Councillors with conflicts of interest to stand aside.

There is no evidence that a sinking lid will achieve the health outcomes suggested, however it will lead to a decline in Community funding over time.

The claimed economic benefits of a prohibition on Gaming Machines is an illusion.

Should the Council consider a sinking lid as a means of eventual prohibition, it opens WCC to Judicial review as such an outcome under the current Gambling Act would be ultra vires.

If the WCC does find Gaming Machines so abhorrent, can I suggest Council and its proxies stop applying for the proceeds, as they are one of the larger recipients.

Attachments:

MEDIA RELEASE: GAMING MACHINE ASSOCIATION OF NEW ZEALAND (11 August 2020)

The Salvation Army and Problem Gambling Foundation this week released a report commissioned from New Zealand Institute of Economic Research outlining the significant economic benefit that would apparently accrue to the retail sector in both income and job creation if spending on gambling on pokie machines was halted.

The report claims that this extra retail spending would generate an additional 1,127 full-time equivalent jobs for 1,724 workers, along with an additional \$58m of GST revenue and additional income tax of \$7m from the retail spend.

What the report is lacking, however, is any consideration of the economic value currently generated by the gambling sector – in fact, the report specifically acknowledges that this was outside its scope. It's therefore a serious misrepresentation of the net value of such a move, given it takes no account of the value that would be lost.

In the end, what the Salvation Army is saying, is: let's take money – and jobs – away from the charity and not for profit sectors – health and rescue, education, community and social support services, environment, and arts and heritage – and give it to the commercial sector. It's an odd stance for a community organisation like the Salvation Army to take.

In a rather naïve statement, the CEO of the Problem Gambling Foundation (Scoop, 10 August 2020) seems to think that the retail sector would then channel their increased profits into things like sports sponsorship. Many of our retail businesses – particularly in the increasingly popular online retail sector – are owned by overseas interests, for a start.

The press release also disingenuously refers to 60% of the revenue from pokie machines going towards the costs of running the system (with the remaining 40% being the returns to the community).

In fact, the community benefit is much more like 80%, with the approximately 40% share that makes up the various taxes, duties and GST in effect also being a community contribution, going into the public purse to contribute to public good. The actual 'running of the system' is only about 20%.

And let's not forget that this 20% also represents money to businesses – local hospitality businesses, trusts, equipment providers and technicians – and a significant number of jobs in our cities, towns and communities.

The report – and the subsequent reporting of it – also fails to address the freedom of New Zealanders to do what they want to with their discretionary spending. Ministry of Health data indicates that over 1.8 million adult New Zealanders enjoy spending their money on the pokies, Lotto, Instant Kiwi, sports and track betting and other forms of gambling. That spending provides them with entertainment, relaxation and social interaction.

Those benefits would be lost if people were not able to spend their money on gambling – all to deal with the tiny (less than 0.5% of the population) number of people who have a gambling problem. The laws and regulations and the measures that have been introduced by the sector are more than adequate to protect and support this small number.

For more information:

Mike Knell
Acting Chair, GMANZ
027 280 2063
Mike.Knell@nzct.org.nz

Pub Charity Limited Donation Recipients Wellington City since 2018:

Approval date	Organisation name	Purpose	Amount funded
1/02/2018	Choirs Aotearoa New Zealand Trust	Course costs and Concert activities	\$ 10,000.00
1/02/2018	Dance Aotearoa New Zealand	Printing and mail out of the DANZ magazine	\$ 3,941.56
1/02/2018	Eastern Suburbs Cricket Club Incorporated	New cricket balls	\$ 2,500.00
1/02/2018	Eastern Volleyball Club Incorporated	Venue & Vehicle hire, flights, accommodation & Contracts	\$ 1,625.00
1/02/2018	New Zealand Basketball Academy Incorporated	Basketball development/skills training and gym hire	\$ 4,956.52
1/02/2018	New Zealand Festival	Technical costs - moorings and barge hire	\$ 10,000.00
1/02/2018	New Zealand String Quartet Trust	Venue Hire	\$ 3,000.00
1/02/2018	North Wellington Football Club Incorporated	Accommodation and travel for under 17 Nationals	\$ 3,500.00
1/02/2018	Polish Senior Citizens Club	Bus hire	\$ 607.83
1/02/2018	Thorndon Club Incorporated	to fix the southern tennis fences on courts 4 and 5	\$ 2,500.00
1/02/2018	Victoria University Netball Club Incorporated	Facility Hire for the 2018 Season	\$ 5,000.00
1/02/2018	Wellington Brass Band Incorporated	Uniforms, instruments repairs and new instruments	\$ 4,800.00
1/02/2018	Wellington Collage	2 sets of rugby jerseys	\$ 1,500.00
1/02/2018	Wellington High School and Com Ed Centre		\$ 3,000.00
1/02/2018	Wellington Land Search and Rescue Incorporated	Pull-up banners	\$ 1,067.20
1/02/2018	Wellington Sexual Abuse Help Foundation	Rent in 2018 for the Wellington Office	\$ 5,000.00
1/02/2018	Wellington Softball Association Incorporated	In schools softball coaching program	\$ 4,000.00
7/03/2018	Dementia Wellington Charitable Trust	Signage, website and replacement f old PCs	\$ 5,000.00
7/03/2018	Capital BMX Club Incorporated	Contracting Fulton Hogan to supply and apply pavecoat	\$ 2,000.00
7/03/2018	Churton Park Community Association Incorporated	Assistance with Neighbours Day Multicultural Fair on 25th March 20	\$ 1,163.00
7/03/2018	Kaibosh	Applying for software support and processing fees	\$ 2,500.00
7/03/2018	Team Wellington Soccer Incorporated	Home and away playing strips	\$ 5,000.00
7/03/2018	The Swimming Trust of Wellington	Funding towards an air handling system for a new community swim	\$ 5,000.00
7/03/2018	United Nations Association of New Zealand (United N	15 full participant scholarships and 10 Maori and Pasifica scholarsh	\$ 3,000.00
7/03/2018	Victoria University of Wellington Association Football	Match and training footballs for the 2018 season.	\$ 2,000.00
7/03/2018	Victoria University Rowing Club Incorporated	To travel to the University Rowing Championships in Karapiro, Victori	\$ 2,000.00
7/03/2018	Wellington Baseball Association Incorporated	Baseballs	\$ 3,000.00
7/03/2018	Wellington Floorball Club Incorporated	Venue Hire	\$ 5,000.00
7/03/2018	Wellington Regional Orchestra Foundation Incorpora	Financial assistance to cover some of their costs for their concert.	\$ 2,500.00
7/03/2018	Wellington Repertory Theatre Incorporated	Venue Hire	\$ 1,000.00
7/03/2018	Wellington Rugby Football Union Incorporated	Hiring the three courses for our 49th annual tournament	\$ 5,000.00
12/03/2018	Rewa Rewa School		\$ 5,000.00
28/03/2018	Central Zone Deaf Rugby Union Incorporated	Accommodation	\$ 2,000.00
28/03/2018	Challenge 2000 Trust	Costs of purchasing new tools	\$ 2,000.00
28/03/2018	Crohn's & Colitis New Zealand Charitable Trust	To purchase a robust and effective Windows based computer system	\$ 5,000.00
28/03/2018	Equestrian Sports New Zealand Incorporated	Medical and ambulance services	\$ 4,500.00
28/03/2018	Johnsonville Community Centre Incorporated	Rents	\$ 1,288.00
28/03/2018	Kidstuff Theatre For Children Incorporated	Production assistance for our April School Holiday Show - Bad Jelly tl	\$ 2,200.00
28/03/2018	Northern United Junior Hockey Club Incorporated	Additional goalkeeping equipment	\$ 2,495.03
28/03/2018	Porirua Grand Traverse Trust	Event Management, timing services and all traffic management on r	\$ 10,619.35
28/03/2018	Sexual Abuse Prevention Network	Two laptops and the associated costs including labour and accessori	\$ 1,509.95
28/03/2018	Skylight trust	Office rental costs	\$ 2,379.20
28/03/2018	Sri Lanka Association of New Zealand (SLANZ) Incorp	Gratuity payments for voluntary tutors	\$ 1,500.00
28/03/2018	Te Ora Hou Wellington East Trust	T-shirts	\$ 650.00
28/03/2018	The Mary Potter Hospice Foundation	3 x Patient bathrooms	\$ 20,086.00
28/03/2018	The Wellington Multiple Sclerosis Society Incorporated	Salaries	\$ 24,675.05
28/03/2018	Virtuoso Strings Charitable Trust Board	Tutors for April holiday programme	\$ 4,500.00
28/03/2018	Wellington Irish Dance Trust Board	Costs of an adjudicator	\$ 2,000.00
24/04/2018	CanTeen Wellington	Key Youth Worker salaries	\$ 10,000.00
24/04/2018	DANZ	Printing and mailout	\$ 2,000.00
24/04/2018	Hill Street Early Childhood Centre Incorporated	Heatpump	\$ 1,000.00
24/04/2018	Kidz Need Dadz Charitable Trust Wellington (Incorpor	6 project operation costs	\$ 10,000.00
24/04/2018	Poneke Football Club Incorporated	Under 10 Junior rugby team travelling to Rugby Tournament Queens	\$ 3,000.00
24/04/2018	Presbyterian Support Central	Counselling sessions for vulnerable Palmerston North women and ch	\$ 8,400.00
24/04/2018	Samaritans of Wellington Incorporated	Photocopying, stationery, printing, postage, heating and lighting, me	\$ 5,000.00
24/04/2018	Sport Wellington	Audio visual and technical costs	\$ 5,000.00
24/04/2018	Supertonic Incorporated	Venue hire costs for our May 2018 concert Shakespeare's Sister	\$ 1,250.00
24/04/2018	The Central Shetland Sheepdog Club Incorporated	Costs of the forthcoming championship shows	\$ 1,200.00
24/04/2018	The Footnote Dance Trust Board	Costs of hiring a van and trailer	\$ 2,500.00
24/04/2018	Young and Hungry Arts Trust	Actor costs	\$ 4,000.00
29/05/2018	Table Tennis Wellington Incorporated	Venue hire	\$ 1,750.00
29/05/2018	Indian Ink Trust	Venue hire	\$ 5,000.00
29/05/2018	Marist St Pats Rugby Football Club Incorporated	Medical and physiotherapy tape for 2018 season	\$ 3,500.00
29/05/2018	North Wellington Junior Football Club Incorporated	Footballs and turf hire	\$ 3,500.00
29/05/2018	Squash Wellington Districts incorporated	Coaching resource to deliver the Squash Wellington 2018 Annual pla	\$ 5,000.00
29/05/2018	Te Kura Kaupapa Maori o Nga Mokopuna	Transport, accommodation and trailer hire	\$ 4,000.00
29/05/2018	The Karori Golf Club Incorporated	New trim / surrounds mower	\$ 5,000.00
29/05/2018	Wellington Gilbert & Sullivan Society Inc	Truck hire	\$ 3,500.00
29/05/2018	Wellington Municipal Croquet Club (Incorporated)	Stage 4 - works on lawn are being timber retaining walls and associa	\$ 5,000.00
29/05/2018	Wellington Rugby Football Union Incorporated	Training and support equipment	\$ 2,800.00
29/05/2018	Wellington West Netball	Netball court hire costs.	\$ 3,624.27
31/05/2018	Wellington Jazz And Music Festival Trust	Cost of lighting in the Wellington Opera House for the 2018 Wellingt	\$ 4,000.00
26/06/2018	The Outpaved Rescue Trust	Venue hire and AV equipment hire for 2018 Rescue Conference	\$ 4,310.60
26/06/2018	Johnsonville School	Half the costs of repairing and replacing items of playground equipm	\$ 5,000.00
26/06/2018	Olympic Harrier & Athletic Club Incorporated	Junior coaching for 26 weeks	\$ 2,034.78
26/06/2018	Parent Help Wellington Incorporated	Promotional material for Parent Helpline	\$ 2,333.43

26/06/2018	Tawa Association Football Club Incorporated	Junior soccer balls, junior First Kicks coaching and training facility co	\$	3,500.00
26/06/2018	Wellington Baseball Association Incorporated	Leased automobile for Wellington Baseball Development Officer to c	\$	5,000.00
26/06/2018	Wellington Basketball Association Incorporated	Contribution towards court hire costs for youth basketball program	\$	10,000.00
26/06/2018	Wellington Competitive Bowlers Association Incorporated	Level one and level two coaching Ten Pin Bowling framework for 10	\$	3,782.61
26/06/2018	Wellington Gilbert & Sullivan Society Incorporated	Support the cost of rehearsal studio hire in preparation for the Socie	\$	2,500.00
26/06/2018	Wellington Hospitals Foundation	New Dialysis machine for the Intensive Care Unit	\$	42,000.00
1/08/2018	Age Concern Wellington Incorporated	Contribution towards the salary and travelling costs of the Communi	\$	10,000.00
1/08/2018	BATS Theatre Limited	Purchase, training and servicing of Evac Chair	\$	2,750.00
1/08/2018	Capital Swim Club Incorporated	Pool lane hire for the Club at Wellington Regional Aquatic Centre an	\$	7,170.00
1/08/2018	KidzStuff Theatre For Children Incorporated	Contribution towards expenses relating to 2018 season of Robyn Ho	\$	3,540.00
1/08/2018	Kiwi Athletic Club Incorporated	Travel costs for five coaches from October 2018 to March 2019	\$	1,500.00
1/08/2018	North Wellington Football Club Incorporated	Tournament entry fees, travel, accommodation and replacement pla	\$	5,000.00
1/08/2018	St Mary's College (Wellington) BOT	Weights equipment	\$	3,309.00
1/08/2018	The Footnote Dance Trust Board	Contribution towards printing costs for programmes and posters for	\$	5,151.61
1/08/2018	Twisters Tawa Gymnastic Club Incorporated	Medals and trophies for 2018 Twisters Gymnastics Competition	\$	1,864.50
1/08/2018	United Sri Lanka Association "USLA(NZ)" Incorporated	Hall Hire	\$	3,000.00
1/08/2018	Wellington Batucada Incorporated	Replacement instruments, straps and sticks	\$	5,000.00
1/08/2018	Wellington South Fencing Club Incorporated	Toitu Ponake - contribution towards The Hub Foundation Club Mem	\$	1,000.00
1/08/2018	Wellington Sri Lankan School	Annual rental fees for hire of classrooms	\$	2,540.00
29/08/2018	Capital Harmony Chorus	One day hire of local town hall	\$	637.50
29/08/2018	Cricknet Wellington Incorporated	One Club Programme with Johnsonville Cricket Club	\$	10,000.00
29/08/2018	Diabetes Wellington Incorporated	Two month's rent for Wellington centre	\$	2,362.87
29/08/2018	Friendship Club of Johnsonville	Bus fees for members on a one day outing	\$	799.00
29/08/2018	Johnsonville Playcentre	Two new sand pit covers	\$	976.00
29/08/2018	JOHNSONVILLE RUGBY FOOTBALL CLUB INCORPORAT	Rugby training and playing equipment	\$	5,264.90
29/08/2018	Kahurangi Friends Incorporated	Sound equipment and hiring of shipping containers for a family frien	\$	3,000.00
29/08/2018	Khandallah Tennis & Squash Club Incorporated	Inter-club tennis balls for Junior Tennis	\$	1,404.00
29/08/2018	Marist AFC Incorporated	Expenses for Referees, medical attendance of First Aid and medals fo	\$	4,426.17
29/08/2018	Primary Sport Wellington Incorporated	Food and Accommodation for a team of 81 primary aged children ar	\$	9,000.00
29/08/2018	Star Boating Club Incorporated	New Safety Boat	\$	8,000.00
29/08/2018	The Wellington Jazz Orchestra Incorporated	Contribution towards production fees for the Wellington concert of	\$	6,000.00
29/08/2018	Thorndon Club Incorporated	Dehumidifiers for squash rooms	\$	7,960.00
29/08/2018	Wellington Basketball Association Incorporated	Contribution towards the costs of replacement representative team	\$	5,000.00
29/08/2018	Wellington College	Accommodation for 2nd XI football team to attend National Champi	\$	3,500.00
29/08/2018	Wellington Hockey Association Incorporated	Travel and accommodation for U15 National Tournament	\$	8,000.00
29/08/2018	Wellington Irish Dance Trust Board	Venue hire, adjudicator fee and sound system hire for dance compet	\$	2,100.42
29/08/2018	Wellington Regional Orchestra Foundation Incorporated	Contribution towards Venue hire costs and NZVL instrument cartage	\$	5,000.00
29/08/2018	Wellington Treasure Trust	Contribution towards venue hire costs for annual festival	\$	2,000.00
27/09/2018	Johnsonville Bowling Club Incorporated	12 month contract fee for Green Keeper	\$	12,000.00
27/09/2018	Johnsonville Cricket Club Incorporated	Cricket balls, helmets and sundry gear for 2018/19 season	\$	10,000.00
27/09/2018	Johnsonville Softball Club Incorporated	New playing uniforms for junior softball teams	\$	5,000.00
27/09/2018	The Women's Boarding House (Wellington) Incorpora	Two commercial washing machines and two commercial driers for th	\$	4,618.33
27/09/2018	Wellington Free Ambulance Service Trust	Contribution towards five new patient transfer service cars	\$	47,379.60
27/09/2018	Wellington Hospitals Foundation	Portable Ultrasound Machine for the Vascular Access Service at Well	\$	20,000.00
27/09/2018	Wellington Russian Club Charitable Trust	Dance Group, hall hire, furniture restoration and advertising for fest	\$	2,500.00
2/11/2018	Asthma New Zealand Incorporated	Asthma / COPD awareness & education in the community - Asthma I	\$	30,000.00
2/11/2018	New Zealand Blind Cricket Association Incorporated	Costs associated with travel and accommodation for the 2018/2019	\$	21,530.00
2/11/2018	Camp Quality Wellington/Central Districts	Accommodation costs for 2019 Summer camp	\$	10,000.00
2/11/2018	Churton Park Tennis And Recreational Club Incorpora	Repairs/resurfacing of tennis courts	\$	5,000.00
2/11/2018	Island Bay Softball Club Incorporated	Ground hire for training for softball and baseball teams 2018/19 sea	\$	770.00
2/11/2018	Johnsonville Tennis Club Incorporated	Tennis balls for 2018/19 season	\$	2,349.60
2/11/2018	Life Education Trust NZ	Distribution through the National office to the 32 Community Trusts	\$	455,000.00
2/11/2018	Onslow Gymnastic Club Incorporated	Hall Hire	\$	5,000.00
2/11/2018	Sacred Heart Cathedral School	Contribution towards artificial turf for lower playground	\$	10,000.00
2/11/2018	Tennis Central Region Incorporated	Purchase of trophies, medallions and engraving for 2018/19 tournam	\$	3,000.00
2/11/2018	The Swimming Trust of Wellington	Contribution towards the cost of water blasting and re-painting the	\$	5,000.00
2/11/2018	The Wellington Regional Sports Education Trust	Contribution towards ambulance services and traffic management p	\$	10,000.00
2/11/2018	Wellington College	Room and meal rate for Lincoln University NZ High Performance Cen	\$	5,000.00
2/11/2018	Wellington Samoa Rugby Union Incorporated	Team travel and accommodation for participation in regional compe	\$	3,570.73
6/12/2018	Creative Capital Arts Trust	Contribution towards printing costs for festival programmes	\$	2,500.00
6/12/2018	Kids Camps New Zealand	Contribution towards accommodation for campers and volunteers	\$	3,500.00
6/12/2018	Netball Central Zone Incorporated	Training venue costs for team	\$	3,000.00
6/12/2018	New Zealand Tango Festival Charitable Trust	Payment for a venue including sound system for a festival	\$	5,400.00
6/12/2018	Newtown Festival Trust	Stage and sound system for 2019 festival	\$	5,000.00
6/12/2018	Polish Senior Citizens Club	Bus hire for members' 2019 outing	\$	752.68
6/12/2018	Post and Ante-Natal Distress Support Group (Wellington)	Contribution towards room hire	\$	4,000.00
6/12/2018	Sri Lankan Seniors' Association Incorporated	Printing a souvenir for anniversary of association	\$	500.00
6/12/2018	St Patrick's College - Wellington	Reserve jackets for 2019 season and beyond	\$	5,000.00
6/12/2018	Te Kura Toi Whakaari o Aotearoa: New Zealand Drama	Contribution towards the purchase of a lathe	\$	1,500.00
6/12/2018	The Performance Arcade Trust	Scaffolding and related expenses for 2019 performance	\$	3,500.00
6/12/2018	Victoria University Netball Club Incorporated	Contribution towards facility hire	\$	5,000.00
6/12/2018	Wellington Sexual Abuse Help Foundation	Contribution towards 2019 office rent	\$	5,000.00
6/12/2018	Zeal Education Trust - Wellington	New furniture for youth facility	\$	3,500.00
31/01/2019	Crofton Downs Primary School	Mobile laptop storage unit	\$	2,799.00
31/01/2019	Marist St Pats Rugby Football Club Incorporated	Contribution towards travel and accommodation costs related to a r	\$	3,000.00
31/01/2019	Netball Wellington Centre Incorporated	Contribution towards accommodation and meals plus training and n	\$	2,500.00
31/01/2019	New Zealand Portrait Gallery Trust	Staging the Edith Amituanai exhibition, Edith and George	\$	7,000.00
31/01/2019	North Wellington Football Club Incorporated	Contribution towards the costs of playing uniform and training equip	\$	3,500.00
31/01/2019	Olympic Harrier & Athletic Club Incorporated	Six months coaching costs for junior members	\$	2,034.78
31/01/2019	Parafed Wellington Incorporated	New uniforms for sports teams	\$	10,000.00

31/01/2019	Star Boating Club Incorporated	Contribution towards the purchase of a second hand rowing boat	\$ 2,500.00
31/01/2019	Summer Shakespeare Trust Board	Contribution towards the cost of lighting for production	\$ 2,000.00
31/01/2019	Team Wellington Soccer Incorporated	Grass match ground fees, artificial training ground fees and playing	\$ 3,000.00
31/01/2019	Thorndon Club Incorporated	Half annual tennis balls	\$ 1,500.00
31/01/2019	Victoria University Rowing Club Incorporated	Travel costs to New Zealand University Rowing Championship.	\$ 3,500.00
31/01/2019	Wellington Diving Club Incorporated	New laptop to support the scoring of competitions	\$ 1,519.00
31/01/2019	Wellington Jazz And Music Festival Trust	Backline costs including hire of instruments and amplifiers	\$ 3,725.00
31/01/2019	WELLINGTON ROWING CLUB INCORPORATED	Transport and accommodation for club competing in the 2019 New	\$ 8,000.00
31/01/2019	Wellington Rugby Football Union Incorporated	Contribution towards winter ground hire costs for 2019	\$ 5,000.00
31/01/2019	YouthDance Education Trust	Contribution towards the promotion and running of a free communi	\$ 2,511.00
1/03/2019	Epilepsy Association Of New Zealand Incorporated	Educator salaries for our national field programme	\$ 100,000.00
1/03/2019	Wellington District Brass Bands Association Incorporated	Accommodation costs and hire of rehearsal rooms	\$ 3,200.00
1/03/2019	Wellington Power Boat Club Incorporated	Water closure, hire of the NZPBA rescue craft	\$ 900.00
1/03/2019	Parent to Parent Wellington	Wages - Regional Coordinator	\$ 5,000.00
1/03/2019	Capital Blues Incorporated	Cost associated with Cuba Dupa	\$ 3,768.75
1/03/2019	College Sport Wellington Incorporated	Venue Hire Expenses for Wellington Volleyball Tournament	\$ 5,000.00
1/03/2019	Parent Help Wellington Incorporated	Information Material for Parent Helpline Promotion	\$ 1,500.00
1/03/2019	The Printing Museum (Incorporated)	Fitout Costs for Wellington Centre for Book Arts	\$ 3,500.00
1/03/2019	Virtuoso Strings Charitable Trust Board	Music tutors - April Virtuoso Strings Holiday Programme	\$ 4,000.00
1/03/2019	Wellington Regional Orchestra Foundation Incorporated	Conductors fee, Signature Choir Fee and NZVL instrument cartage fo	\$ 5,000.00
28/03/2019	New Zealand Choral Federation Incorporated	Venue hire and associated venue costs	\$ 4,488.37
28/03/2019	Central zone deaf rugby union incorporated	Accommodation Central Zone Deaf Rugby) in Auckland	\$ 3,000.00
28/03/2019	KAI BOSH	Funding towards the donor management system	\$ 4,136.82
28/03/2019	KIDZSTUFF THEATRE FOR CHILDREN INCORPORATED	Funding assistance with show 1 2019	\$ 3,212.50
28/03/2019	Marist AFC Incorporated	First aid equipment, first team strip and embroidery	\$ 2,885.51
28/03/2019	New Zealand School Of Dance	Upright piano	\$ 5,000.00
28/03/2019	North Wellington Junior Football Club Incorporated	To Purchase coaching aids and equipment for the junior football clu	\$ 3,472.31
28/03/2019	PORT NICHOLSON & PONEKE CYCLING CLUB INCORPORATED	Funding for toilets, signage, security, first aid, Race plates & Race tin	\$ 6,000.00
28/03/2019	Squash Wellington Districts Incorporated	Coaching.	\$ 6,000.00
28/03/2019	The Mary Potter Hospice Foundation	Contribution toward Isolation room and sluice Room	\$ 20,000.00
28/03/2019	Wellington Baseball Association Incorporated	Facility Hire.	\$ 7,513.04
28/03/2019	WELLINGTON FLOORBALL CLUB INCORPORATED	Requesting funding for venue hire for Kilbirnie ASB stadium.	\$ 6,617.39
28/03/2019	Wellington Irish Dance Trust Board	Adjudicator's fees, flights, and accommodation.	\$ 2,432.48
28/03/2019	Wellington Rugby Referees Association Incorporated	purchase of replacement referee jerseys and warm up tops	\$ 8,000.00
30/04/2019	EVOLocity Limited	Contribution towards electric vehicle kits.	\$ 16,000.00
30/04/2019	Ekta NZ Incorporated	Accommodation, promotion and advertising	\$ 5,000.00
30/04/2019	HURRICANES YOUTH RUGBY COUNCIL INCORPORATED	Contribution towards 12 sets of referee jerseys, shorts and socks.	\$ 1,000.00
30/04/2019	Muscular Dystrophy Association (Tuatara/Central Region)	To purchase a replacement cough machine.	\$ 11,060.00
30/04/2019	Paparangi Scout Group	Contribution towards cost of 22 Scouts and 4 leaders to attend 22n	\$ 10,156.00
30/04/2019	SEATOUN ASSOCIATION FOOTBALL CLUB INCORPORATED	To purchase playing kits, match balls and training bibs.	\$ 4,000.00
30/04/2019	SRI LANKA ASSOCIATION OF NEW ZEALAND (SLANZ) INCORPORATED	To pay gratuity payments to the tutors responsible for providing volu	\$ 1,500.00
30/04/2019	TAWA ASSOCIATION FOOTBALL CLUB INCORPORATED	To fund training facilities	\$ 4,000.00
30/04/2019	THE ORPHEUS CHOIR OF WELLINGTON INCORPORATED	Contribution towards artist fees for the performance of Mozart's Re	\$ 750.00
30/04/2019	THE WELLINGTON MULTIPLE SCLEROSIS SOCIETY INCORPORATED	1/4 salaries for field workers, telephone & internet costs, motor veh	\$ 28,441.22
30/04/2019	The Wellington Regional Sports Education Trust	Contribution towards audio-visual and technical costs	\$ 5,000.00
30/04/2019	Thorndon Club Incorporated	To purchase squash balls	\$ 600.00
30/04/2019	Wellington Basketball Association Incorporated	Contribution towards the costs of 2019 youth basketball program -ri	\$ 10,000.00
3/05/2019	St Patrick's College - Wellington	Pool hire fees for 2019 season	\$ 1,043.40
30/05/2019	CAPITAL SWIM CLUB INCORPORATED	July pool lane hire.	\$ 6,225.18
30/05/2019	JOHNSONVILLE RUGBY FOOTBALL CLUB INCORPORATED	To purchase balls, reversible bibs, kicking tees and netting ball carry	\$ 2,090.00
30/05/2019	New Zealand Choral Federation - Wellington Region	Contribution towards venue hire	\$ 3,500.00
30/05/2019	Newlands College	Funding for Kapa Haka group to attend 3 day workshop 13-16 June 2	\$ 2,868.00
30/05/2019	Sexual Abuse Prevention Network	To purchase laptops and associated accessories	\$ 4,857.00
30/05/2019	St Bernard's School (Brooklyn)	To purchase 25 Chromebooks	\$ 5,000.00
30/05/2019	UNITED NATIONS ASSOCIATION OF NEW ZEALAND (UNZNZ) INCORPORATED	Catering for the NZ Model United nations 2019 conference	\$ 4,000.00
30/05/2019	Wellington College	Contribution towards accommodation and van hire- to support the l	\$ 5,000.00
30/05/2019	Wellington Municipal Croquet Club (Incorporated)	Contribution towards 6 sets of croquet balls	\$ 1,000.00
30/05/2019	WELLINGTON TREASURE TRUST	Venue hire	\$ 12,950.00
27/06/2019	WELLINGTON ZOO	Giraffe Enclosure	\$ 400,000.00
27/06/2019	KIDZ NEED DADZ CHARITABLE TRUST WELLINGTON	(This application has been created to the overturned application PCL	\$ 10,000.00
27/06/2019	Age Concern Wellington Incorporated	Salary	\$ 4,003.00
27/06/2019	BROOKLYN NORTHERN UNITED ASSOCIATION FOOTBALL CLUB INCORPORATED	Coaching and training facilities.	\$ 2,425.95
27/06/2019	Challenge 2000 Trust	Costs for holiday programme.	\$ 1,181.47
27/06/2019	KAPI-MANA BRIDGE CLUB INCORPORATED	This application has been created to overturn applications PCL40989	\$ 4,000.00
27/06/2019	Olympic Harrier & Athletic Club Incorporated	Junior coaching for 6 months 27th July 2019-25th January 2020.	\$ 2,034.78
27/06/2019	Red Scare Theatre Trust	To hire a storage unit.	\$ 1,606.90
27/06/2019	The Zimbelstern Foundation	Contribution towards technical hire	\$ 1,500.00
27/06/2019	VOGELMORN COMMUNITY GROUP CHARITABLE TRUST	Operational costs.	\$ 3,000.00
27/06/2019	Wellington Hospitals Foundation	To purchase 2 x Omnibeds.	\$ 42,599.00
27/06/2019	Western Suburbs Rugby Football Club Incorporated	Replacing the roof on the gymnasium at Wests Clubrooms	\$ 10,000.00
1/08/2019	Age Concern Wellington Incorporated	3 x mobile phone handsets and a colour printer.	\$ 897.38
1/08/2019	NETBALL CENTRAL ZONE INCORPORATED	Venue hire and accommodation	\$ 2,227.44
1/08/2019	North Wellington Football Club Incorporated	Travel and accommodation for Youth National U19 Tournament.	\$ 4,333.92
1/08/2019	Samaritans of Wellington Incorporated	Operational costs.	\$ 1,544.00
1/08/2019	SANZ Johnsonville Scout Group	Contribution towards jamboree fees.	\$ 8,500.00
1/08/2019	The House of Grace Trust Inc	3 months operating costs.	\$ 559.48
1/08/2019	THE ORPHEUS CHOIR OF WELLINGTON INCORPORATED	Contribution towards artist fee.	\$ 1,500.00
1/08/2019	Wellington District Theatre Federation Incorporated	Contribution towards venue hire.	\$ 1,200.00
1/08/2019	WELLINGTON RUSSIAN CLUB CHARITABLE TRUST	Russian cultural festival 2019 - Venue hire, Advertising and performe	\$ 2,500.00
29/08/2019	Heart Kids New Zealand Incorporated	IT Equipment, Web Maintenance and Stationery	\$ 21,500.00

29/08/2019	DRESS FOR SUCCESS WELLINGTON INCORPORATED	Showroom fittings and furniture.	\$	7,461.19
29/08/2019	Friendship Club of Johnsonville	Bus trip to Kaitoki.	\$	520.00
29/08/2019	Indian Ink Trust	Macbook Pro	\$	2,867.82
29/08/2019	JOHNSONVILLE CRICKET CLUB INCORPORATED	Cricket balls, gear, helmets and team clothing.	\$	45,089.00
29/08/2019	JOHNSONVILLE RUGBY FOOTBALL CLUB INCORPORATED	Medical and first aid supplies.	\$	7,930.80
29/08/2019	Johnsonville Tennis Club Incorporated	Replacement and upgrade of the Honours Board	\$	1,610.00
29/08/2019	Johnsonville Terrace Centre Trust Board	Contribution towards counselling fees.	\$	8,000.00
29/08/2019	Khandallah Arts Theatre Incorporated	Contribution towards replacing curtains and blinds at Cochran Hall.	\$	1,515.71
29/08/2019	KHANDALLAH TENNIS & SQUASH CLUB INCORPORATED	Tennis balls for junior tennis.	\$	1,547.00
29/08/2019	KidzStuff Theatre For Children Incorporated	Funding assistance towards show 3 2019 for Technical Manager, Set	\$	3,394.00
29/08/2019	Onslow Gymnastic Club Incorporated	Hall hire for gymnastic training.	\$	2,956.30
29/08/2019	Primary Sport Wellington Incorporated	Entry fees and travel costs.	\$	6,331.10
29/08/2019	STAR BOATING CLUB INCORPORATED	Contribution towards sliding boat rack.	\$	5,000.00
29/08/2019	Wellington Basketball Association Incorporated	Air relax unit and court hire.	\$	5,109.57
29/08/2019	Wellington Floorball Club Incorporated	Venue hire and goalie gear.	\$	7,486.44
26/09/2019	Thorndon School	Four TV sets and rolling stands.	\$	4,000.00
31/10/2019	New Zealand Water Polo Association Incorporated	Pool hire costs - under 14 and under 16 events	\$	30,013.00
31/10/2019	NEW ZEALAND KUNG FU, WUSHU FEDERATION INCORPORATED	Medals for National Kung-Fu Wushu Championships	\$	2,107.00
31/10/2019	Johnsonville Tennis Club Incorporated	Replacement of light fittings	\$	51,785.00
31/10/2019	LIFE EDUCATION TRUST NZ	Distribution of operating grants and support through the National Office	\$	465,000.00
31/10/2019	NGAIO LAWN TENNIS CLUB INCORPORATED	Replace the carpets in clubrooms	\$	3,179.13
31/10/2019	North Wellington Football Club Incorporated	To replace playing uniforms and equipment.	\$	4,782.62
31/10/2019	Onslow College	Flights for rowers and support crew	\$	7,443.48
31/10/2019	Outward Bound Trust of New Zealand	Course costs for students	\$	300,000.00
31/10/2019	Paparangi School	For Sports Uniforms	\$	4,318.00
5/12/2019	Age Concern Wellington Incorporated	8 weeks salary for Health Promotion and Community Support Coordinator	\$	7,080.00
5/12/2019	CCCS Newlands Church Choir	Keyboard/piano and cultural uniform for performance.	\$	2,180.00
5/12/2019	New Zealand opera limited	Refer to previous application PCL44740	\$	50,000.00
5/12/2019	Samaritans of Wellington Incorporated	Contribution towards salary for Volunteer Co-ordinator.	\$	5,000.00
5/12/2019	THE LIFE FLIGHT TRUST	Purchase and installation of a portable ultrasound machine for Life Flight	\$	13,950.00
5/12/2019	The Onslow Cricket Club Incorporated	Playing uniforms including clads.	\$	4,245.65
5/12/2019	The Wellington Regional Sports Education Trust	Medic services for Wellington Round the Bays - 16th February 2020.	\$	8,342.00
5/12/2019	WELLINGTON RED HACKLE PIPE BAND INCORPORATED	A set of tone/reed protectors.	\$	3,150.00
5/12/2019	Wellington Water Polo Board Incorporated	Pool hire at Huiia Pool.	\$	3,000.00
30/01/2020	Bellevue School - Newlands	To purchase iPads.	\$	12,368.00
30/01/2020	DRESS FOR SUCCESS WELLINGTON INCORPORATED	Contribution towards Phase 2 Enhanced Service & Improvements.	\$	12,000.00
30/01/2020	Johnsonville Softball Club Incorporated	Accommodation and Van/Trailer hire for the Mens Club Opens - 17th	\$	4,795.17
30/01/2020	Olympic Harrier & Athletic Club Incorporated	Junior coaching for 6 months 26th January 2020 - 26th July 2020.	\$	2,034.78
30/01/2020	Onslow Branch of Wellington Pony Club Incorporated	5 cross country jumps.	\$	1,874.50
30/01/2020	Polish Senior Citizens Club	Transport for 2020 outing to Waikanae/Paraparaumu.	\$	963.70
30/01/2020	The Performance Arcade Trust	Scarfolding stage, stairs and engineers fees for 2020 performance.	\$	2,725.00
30/01/2020	Wellington Baseball Association Incorporated	Field Hire for 2019/20 season.	\$	2,151.30
30/01/2020	Wellington Irish Dance Trust Board	Costs for grade exams in 2020.	\$	3,488.71
30/01/2020	Wellington Sexual Abuse Help Foundation	1 months rent for March 2020.	\$	5,812.50
30/01/2020	Young and Hungry Arts Trust	Contribution towards 3-week wages for actors for the 2020 national	\$	4,750.00
30/01/2020	YouthDance Education Trust	Theatre hire, sound technicians and promotion for International Dance	\$	3,819.00
26/02/2020	JOHNSONVILLE BOWLING CLUB INCORPORATED	Greenkeeper's salary for 12 months.	\$	12,000.00
26/02/2020	JOHNSONVILLE RUGBY FOOTBALL CLUB INCORPORATED	Insurance for clubrooms for 2020-2021 season.	\$	11,250.00
26/02/2020	KidzStuff Theatre For Children Incorporated	Costume and insurance costs.	\$	1,481.20
26/02/2020	NETBALL WELLINGTON CENTRE INCORPORATED	Registration fees and accommodation to attend the National tournament	\$	2,500.00
26/02/2020	PORT NICHOLSON & PONEKE CYCLING CLUB INCORPORATED	Costs for Cycling NZ Schools North Island Mountain Bike Championships	\$	2,375.00
26/02/2020	THE WELLINGTON JAZZ ORCHESTRA INCORPORATED	Theatre hire.	\$	1,950.00
26/02/2020	Victoria University Netball Club Incorporated	Contribution towards facility hire.	\$	3,000.00
26/02/2020	Victoria University Rowing Club Incorporated	Flights to attend AON 2020 University Rowing Championships in Twickenham	\$	3,000.00
26/02/2020	WELLINGTON COMPETITIVE BOWLERS ASSOCIATION	Playing shirts for teams competing in the National Team Championships	\$	1,428.00
26/02/2020	Wellington Regional Orchestra Foundation Incorporated	Venue hire for Beethovens Big Birthday Bash - March 2020.	\$	3,310.00
26/02/2020	WELLINGTON VOLUNTEER CENTRE	To purchase a flag.	\$	665.00
3/08/2020	Epilepsy Association of New Zealand Incorporated	Salary for educators	\$	100,000.00
3/08/2020	Amesbury School	Sports coaching and travel to ASB Sports Centre.	\$	5,000.00
3/08/2020	Big Buddy Mentoring Trust	Laptop (incl peripherals) and phone.	\$	4,071.40
3/08/2020	College Sport Wellington Incorporated	Venue hire and timing services August - September 2020.	\$	3,954.85
3/08/2020	Friendship Club of Johnsonville	Transport cost for trip to Kapiti Coast - November 2020	\$	545.00
3/08/2020	Johnsonville Tennis Club Incorporated	Replacement/upgrade of electrical fixtures and fittings	\$	4,400.00
3/08/2020	Life Education Trust NZ	Distribution through the National Office and core Life Education Trust	\$	381,500.00
3/08/2020	NETBALL WELLINGTON CENTRE INCORPORATED	Court hire	\$	2,000.00
3/08/2020	Paparangi School	New Chromebooks.	\$	5,230.00
3/08/2020	Sacred Heart Cathedral School	iPads (incl cases) and chrome books.	\$	5,857.68
3/08/2020	Squash Wellington Districts Incorporated	Academy Coaching	\$	6,000.00
3/08/2020	St Brigids School (Johnsonville)	20 new iPads including cases and set up.	\$	13,953.60
3/08/2020	WELLINGTON FLOORBALL CLUB INCORPORATED	Court hire for end of July - August 2020	\$	8,000.00
31/08/2020	Alex Moore Park Sport and Community Incorporated	Contribution towards construction costs of a new sport and community	\$	25,000.00
31/08/2020	Johnsonville Cricket Club Incorporated	Cricketer gear.	\$	20,002.59
31/08/2020	Olympic Harrier & Athletic Club Incorporated	Junior coaching for six months	\$	2,034.78



**SPORT WELLINGTON SUBMISSION TO WELLINGTON
CITY COUNCIL'S PROPOSED GAMBLING VENUES
POLICY**

WELLINGTON CITY COUNCIL

on the:

GAMBLING VENUES POLICY – Statement of Proposal

Date:

1 October 2020

Address for contact:

Phil Gibbons ONZM

Chief Executive

Sport Wellington

Email: philg@sportwellington.org.nz

Phone: 021 650 604

INTRODUCTION

1. Thank you for the opportunity to provide feedback on the Gambling Venues Policy – Statement of Proposal.
2. Sport Wellington is a Regional Sports Trust (RST) established in 1990 with charitable status under the Charities Act.
3. We are the independent body for physical activity (play, active recreation, and sport) in the greater Wellington region, dedicated to improving the health and wellbeing of the communities we serve. We believe that being regularly physically active can transform peoples' lives through generate positive social and wellbeing outcomes for individuals and communities.
4. Our strategic priorities as outlined in our Strategy 2032 are:
 - Less active people become more active
 - Opportunities to be active better meet the needs of participants
 - A connected and effective regional physical activity system

THE VALUE OF ACTIVE RECREATION, AND SPORT

5. Active recreation and sport activities play a significant part in people's lives in Wellington and the wider region.
6. Sport New Zealand's 2015 report on The Economic Value of Sport and Recreation to the Wellington Region identified the following:
 - Nearly 9 out of 10 (89.7 per cent) young people (5-17 years) in the region spend at least three hours per week in organised or informal sport and recreation activity.
 - Over 8 out of 10 (86.5 per cent) adults (18 years or older) take part in at least one sport or recreation activity (excluding walking and gardening) over a year.
 - These activities are supported by 115,000 volunteers.
 - Volunteers contributed 8.1 million hours to sport and recreation in 2013/14.
 - The estimated market value of these volunteered services is \$122.7 million at 2013 values.
 - Sport and recreation industries provide employment for people in the Wellington region
 - More than 4,000 people (4,311) work in sport and recreation industries
 - The sport and recreation sector (narrowly defined) is estimated to have contributed \$388.6 million to regional GDP in 2012/13, or 1.3 per cent.
 - Sport and recreation education is important in Wellington schools with just over five per cent of the National Curriculum being related to sport and recreation.
7. A further Sport NZ study exploring the value of sport to New Zealanders, their communities and our country found that participation in active recreation and sport leads to:
 - Happier, healthier people (both physically and mentally)
 - Better connected communities as a result of strengthened social and community networks

- A stronger New Zealand – financially and through strengthened regional and national identity.

OPTION C – OUR PREFERRED OPTION

8. After consideration of the Statement of Proposal, our preferred option is Option C: No change to the current arrangements relating to machines and venues in Wellington.

Why Option C?

9. We support Option C because:

There is no evidence to justify a change from the status quo.

- There has been no significant rise in the number of machines and/or venues. We understand that since 2004, venue numbers have reduced, and that gaming machine numbers have also reduced by 25% over the last 10 years. The level of gambling and the problem gambling rate has remained at the same level over that time. New Zealand has one of the lowest problem gambling rates in the world.

The timing of the proposed changes and the current environment

- The community funding model currently used to distribute Class 4 gaming is working well. However, Covid-19 has had a devastating effect on many sectors including active recreation and sport because of lockdown impacting the flow of funds and the inability of Class 4 organisation to hold reserves. This has put at risk many community activities and services provided through active recreation and sport and the consequent value that these activities create for communities.

No viable, sustainable alternative funding sources

- Fewer machines mean fewer grants. In the last 12 months funding generated across the wider region from Class 4 gaming was \$61 million of which \$16.9 million was returned to community activity in Wellington city. There are no other sources of funding currently that would provide a substitute for the amount of Class 4 funding being accessed by the community.
- Community active recreation and sport organisations have traditionally been reliant on Class 4 gaming, and while this makes these organisations vulnerable this is their reality where they are using a funding source that is regularly available and accessible in the absence of other viable funding options. There are organisations in our region who would become insolvent almost immediately without this funding.
- Organisations are working hard to diversify their income however, corporate dollars are extremely difficult to access, fundraising activity does not generate a high return, and there is unlikely to be any Government funding set aside to cover the activities that are currently funded by Class 4. As we move as a country into a recession, this will make accessing funding from alternative sources more difficult.

The magnitude of good overlooked

- We acknowledge there is a social cost to gambling when this becomes a problem for an individual impacting family and friends. However, for the sake of balance, the vast social value created by the funding generated from gambling must also be properly

acknowledged. Children, in particular, are the beneficiaries of the application of these funds.

- It is important to recognise that this funding is not applied to projects or programmes that are 'nice' extras. Funding in the vast majority of instances is used to support core costs incurred within sport and recreation and in many cases to keep the doors open. The common categories across which funding can be classified are salaries, facility hire costs, sports equipment, maintenance, events, tournaments and camps, and coaching.

COMMENT

Problem gambling

- We acknowledge there is a negative impact of gambling. While New Zealand has one of the lowest problem gambling rates in the world (0.2% across all forms of gambling) we recognise that there is a need for help and assistance for those for whom gambling is an addiction.
- Gaming trusts and hospitality staff must adhere to the Gambling Act's regulations including having active harm prevention and minimisation measures in place. The industry pays an annual problem gambling levy of \$20 million to the Government and gaming trusts directly spend \$3-4 million each year on other harm prevention and minimisation initiatives.
- We support the continued funding to address this issue.
- Taking gaming machines out of communities will not reduce problem gambling. As we saw through Covid-19 lockdown, people who want to gamble will find other ways to do so. While the extent of online gambling by New Zealanders has yet to be fully researched, it is obvious from overseas research and anecdotal evidence that online gambling is growing very quickly. Online gambling options are more harmful because they are unsupervised, less regulated, incentivised to encourage more gambling, and use virtual money rather than cash. And there is no return to the community.

Funding options

- Class 4 Gaming is well-regulated to provide a financial return to the community for the benefit of those communities. Moves to reduce or remove this opportunity will have some undesirable consequences over time.
- This is the funding system that is currently available to sector groups. There are no viable alternatives and funding from other sources is difficult to access despite the hard work and continued effort of sector organisations to do. Covid-19 has made this even tougher.

Unintended consequences

- The sinking lid option is proposed to address the harm done by Class 4 gaming. However, the proposal does not give thought to the harm that may be created because of the withdrawal of the community services that are currently funded through Class 4 gaming returns. In the case of active recreation and sport the value to individuals and communities is well documented. <https://sportnz.org.nz/media/1312/the-value-of-sport-main-report.pdf>

- There will also be some financial consequences for Wellington City Council should a sinking lid policy be applied. As an example, gaming funding is often accessed to cover costs associated with facility and ground hire from Wellington City Council. In addition, there will be increased expectations on Council to fund activities that were previously funded through gaming proceeds, to at least preserve the status quo in terms of delivery of active recreation and sport services. Some of these impacts are listed later in this submission.

The potential impact on Sport Wellington

- The impact of reduced availability of gambling funding will be significant for Sport Wellington and ultimately the sector we serve and support.
- We source funding to support coaching delivery, facilitation costs associated with the delivery of leadership development, staff development, generating insights and evaluation information, regional workforce development, programme delivery that enhances other contracted programme roll-out, and operational costs such as rent, power, and salaries.
- Round the Bays is an iconic Wellington event. It provides an opportunity for people within and outside Wellington to set goals, train for, and participate in a large and positive community experience. Delivery costs of this event are covered through accessing gaming funding and an inability to do so would compromise this event significantly.

IN CONCLUSION

- We thank you again for the opportunity to provide you with feedback on your Statement of Proposal for change to your Gambling Venues Policy.
- For the reasons outlined in this submission we support Option C: No change to current policy
- We will take the opportunity to speak to this submission.



Phil Gibbons ONZM
CEO, Sport Wellington

Survey Responses

28 March 2019 - 20 October 2020

Submissions for the Gambling Venues Policy

Kōrero mai | Wellington City Council

Project: Gambling Venues Policy





Respondent No: 16

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. **Your name**

Aneira Komene

Q2. **Your email or postal address**

[REDACTED]

Q3. **Your phone number**

[REDACTED]

Q4. **You are making this submission:**

as an individual

Q5. **What is the name of your organisation**

not answered

Q6. **Would you like to make an oral submission to the Councillors?**

Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)

Q7. **What is your preferred option?**

Option A: Implement a sinking lid

Q8. **What strengths does your preferred option have over the other options?**

It reduces psychological stress factors and it also reduces financial loss for people whom does not have the finances that in reality doesn't exist. It reduces crime rates e.g Beneficiaries whom gamble can barely survive on the benefit and they usually turn to a criminal mindset when they need to feed the urge and some degrade themselves so much for a gamble they lie to themselves and steal and lie to family and friends they burgle they scam they do everything and anything they can to get money even sell their souls or sell their children off to feed the addiction. It's a very bad addiction gambling and I would know cos I've been a gambler for 20+years. And I've come across people who do these things even I've done these things except sell my soul and children off as I don't have any children and wouldn't ever dare Inthe world do it to my own if ever! This eliminating gambling will end financial crisis for us people whom live here in Wellington, we are barely even surviving due to fact our country is in a world pandemic.

Q9. **Is there any other information you want to include in your submission?**

As a extreme excessive gambler, I'd like for you to help me by eliminating them here in Wellington as it's only putting everyone in financial strife and leaving us whom gambler in debt or somehow a situation that puts us in that poverty line making us struggle even before the struggle got real. Help me help us. Gambling needs to be eradicated from Wellington, and when I say gambling I'm specifically talking pokies!



Respondent No: 23

[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Cyrus Frear
-
- Q2. **Your email or postal address** [Redacted]
-
- Q3. **Your phone number** [Redacted]
-
- Q4. **You are making this submission:** as an individual
-
- Q5. **What is the name of your organisation** not answered
-
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
-
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:
-
- Q8. **What strengths does your preferred option have over the other options?**
- We've got bigger fish to fry at the moment! Dedicating resources to gambling policy is unwise and unnecessary. More importantly, gambling addiction should be addressed from a deeper level. The behaviour is only the top of the iceberg, and putting draconian measures in place to minimise exposure to gambling only channels the desire towards other harmful activities. Finally, people should be free to supply and receive goods and services; option A is simply against the most basic human right: freedom!
-
- Q9. **Is there any other information you want to include in your submission?**
- The Islamic regime in Iran has banned sale, supply and consumption of alcohol for more than 40 years, and severely punishes those who drink alcohol in any amount (up to 80 lashes). What do people do? not drink? Wrong! They buy industrial alcohol or methanol from pharmacies and drink that instead in enclosed areas with fear and stress, and a big number of them go blind every year due to consuming alcohol that was not made to be drunk!
-



Respondent No: 40

[Redacted]
[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Annaliese Johnston
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** as an individual
- Q5. **What is the name of your organisation** not answered
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid
- Q8. **What strengths does your preferred option have over the other options?**
- Sinking lid means that numbers of pokie machines will reduce over time. I believe this is the best option for our community in Wellington. Gambling harm from pokies disproportionately impacts vulnerable people and communities. According to the Problem Gambling Foundation, pokies are considered the most harmful form of gambling. They give players unrealistic impressions of the odds of winning, confuse people about how much money they have lost, and encourage sustained periods of gambling – often in the hope of recovering losses. They also disproportionately feature in poorer communities and can exacerbate existing inequality and social harms, including family violence. As a resident of Kelburn I don't see any pokies in my community and it is unjust that other communities have to bear the burden of them. I believe a sinking lid policy is the best and least harmful policy for Wellington council to choose. Other councils around the nation have adopted this policy and it is time Wellington caught up. I also encourage the council to both vote for the sinking lid policy and include the policies of not allowing relocation of pokies and no mergers, and to ensure that TABs are included in the sinking lid policy. These elements will ensure a strong harm prevention approach to pokies in Wellington.
- Q9. **Is there any other information you want to include in your submission?**
- not answered



Respondent No: 44

[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Manu Ward
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** as an individual
- Q5. **What is the name of your organisation** not answered
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid

Q8. What strengths does your preferred option have over the other options?

A sinking lid policy would have the effect of reducing the number over time of these harmful machines. This would allow community groups time to transition to more ethical funding models. It would eventually result in less money lost to gambling from my suburb in Newtown, ultimately benefitting families and economy of our suburb.

Q9. Is there any other information you want to include in your submission?

Please strengthen the proposed sinking lid policy to include bans on relocations and venue mergers (following the example of Gisborne, among others). It should also explicitly include TAB venues in the same policy. As a resident of Newtown since 2002, I have had involvement with community development initiatives particularly with social housing tenants at Te Ara Hou and Newtown Park Flats, through organisations such as Urban Vision, the Newtown Community Centre, and St Thomas church. One woman I know recently took the courageous step of banning herself from all local gaming venues, but in moments of weakness was still able to travel to the next suburb to find a venue where she was not known. The Health Promotion Agency (HPA) report of 2018 states that half (49%) of pokies users (at least monthly) experienced some harm from their gambling. This indicates that the "small" gambling problem is really concentrated at pokies. The DIA has estimated that 30% of money lost to pokies are from problem gamblers. Pokies target the most vulnerable to make fundraising easier. This is an unethical funding model, particularly in a recession, and to portray the resulting community grants as a net social benefit is disingenuous. I acknowledge that fundraising is hard work. My daughter's kindergarten regularly holds raffles for specific needs. But none of us would ever dream of deliberately targeting problem gamblers who will readily hand over cash they cannot afford, just to make it faster and easier to pay for a new sandpit (for example)! Yet that is exactly the nature of fundraising with pokies machines. I once set up a community playgroup in Berhampore, and out of principle, only applied for grants from ethical sources, such as COGS, because I could not in good conscience avail of gambling funds. I am sure that if the real source of the funding was more transparent, many more community groups would feel this way. Pokies machines are carefully designed for psychological manipulation, to keep a user playing longer and with the feeling of "almost winning". But the odds of winning is based on a digital algorithm that is not actually equivalent to an old-style mechanical slot machine. Reportedly 19 of 67 territorial authorities already adopt a sinking lid policy in NZ, including Auckland, Christchurch, Dunedin, Invercargill, and Porirua. Let us follow their example. For the sake of the most vulnerable, we must dream of a future where these machines are simply not in our city at all.



Respondent No: 50

[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Joshua Bruce
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** as an individual
- Q5. **What is the name of your organisation** not answered
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

Outlined on previous answer. Repeated below. I believe you should implement both option A and option B at the same time. Reducing the number of machines, reinstating the regulations outlined, changing the boundaries and also implementing a sinking lid policy. If I had to chose one I would choose option A but believe both together is a stronger decision. In reality without additional public pressure option A is effectively do nothing. Secondly I believe that the upcoming bottle recycling deposit scheme provides a huge opportunity for alternative community funds. If all bottles collected via kerbside recycle were considered donations to a community fund admistered by the community trust, plus any venues / gambling trusts which committed to giving up their pokie machies over 3 years also got a proportion of the funds to distribute, plus a phase out grant to venues as they withdrew their machines over the 3 years. Then all parties win and the community is better off. When those at the bottom suffer we all suffer. When they suffer we pay more for health care, support services, mental health and addiction counselling, crime, policing, state care if children the list goes on... when they suffer, we pay. Just sometimes / most the time we don't realise or think it doesn't affect us. Council have an opportunity to call out the best in people and not just regulate change, but inspire it. We need to consider gaming trusts and business owners and call on those who really do care about people and their communities as most do to take a proactive and unified step towards positive change.

Q9. Is there any other information you want to include in your submission?

not answered



Respondent No: 56

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. **Your name** Mino Cleverley
- Q2. **Your email or postal address** [REDACTED]
- Q3. **Your phone number** [REDACTED]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Pacific Advisory Group (PAG), Wellington City Council
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid
- Q8. **What strengths does your preferred option have over the other options?**
As a group, PAG unanously wishes to see reduced harm to our communities that problem gambling may facilitate and sees A as the best option to help achieve this we believe.
- Q9. **Is there any other information you want to include in your submission?**
not answered



Respondent No: 58

[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Susannah Lees-Jeffries
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Royal New Zealand Ballet
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

We feel that gaming trusts benefit the community through significant financial support for community, cultural and sporting organisations. At a time of economic uncertainty it would be well-nigh impossible to replace this support with funding from other sources. Reducing the number of gaming venues in Wellington will reduce community funding.

Q9. Is there any other information you want to include in your submission?

We have prepared a short written submission outlining the Royal New Zealand Ballet's position in more detail and will be emailing this to policy.submission@wcc.govt.nz.



Respondent No: 73

[Redacted]
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[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Sai Lealea
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Wellington Fijian Pastors Group
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid

Q8. What strengths does your preferred option have over the other options?

Submission to the Wellington City Council on the "Gambling Venues Policy" from the Wellington Fijian Pastors Group

Introduction This is a submission by the Wellington Fijian Pastors Group (WFPG) on the proposed Gambling Venues Policy of the Wellington City Council. The WFPG is comprised of church pastors and elders from the main Fijian churches in Wellington. They have the interest of their parishioners and members of their families and communities in mind in making this submission. It is a submission that:

- provides a brief background to the policy
- outlines the rationale behind the proposal;
- sets out the position they take on the policy; and
- concludes with brief remarks.

The WFPG also welcomes the opportunity to appear as a group to present its submission to the City Council if provided. Background: Wellington City Council is seeking feedback on its proposed gambling venues policy for electronic gaming machines, more commonly known as 'pokies'. The Council has powers to determine which TABs, pubs and clubs can host pokie machines. The current policy limits the number of machines in certain areas, but we would like the policy to include a 'sinking lid'. That means no new pokies venues would be able to open in the Wellington area. We think a sinking lid is the best policy to reduce the number of pokie machines and reduce gambling harm

Why is this important? Currently, Wellington City has 633 pokies across 40 venues. In 2019, people in Wellington lost over a staggering \$40 million on these machines. Some people support pokies because the gambling losses are used to fund community groups. But only 40% of the losses are returned to the community and not always into the community it comes from. Pokies are highly addictive and are the most harmful form of gambling. It is estimated that 30% of the money lost on pokies comes from people experiencing harm. Pokies outside casinos make up almost 50% of the people who seek help about their gambling. Pokie machines in Wellington are clustered in the most deprived neighbourhoods in the city where people can least afford to lose significant amounts of money. What needs to happen? We are asking the Wellington City Council to implement a sinking lid policy. That will mean the Council will refuse new consents to any TAB, pub or club that applies to host pokies. This will reduce, over time, the number of pokie machines in Wellington City. We know that Wellington City Council can do the right thing and listen to the people in their community. The council can make the changes to respond to the harm pokies are causing. Conclusion The WFPG fervently believes that a sinking lid policy is the best option for Wellington and its residents going forward as it provides a gradual path to reducing the number of machines and venues while considering other avenues of fundraising.

Q9. Is there any other information you want to include in your submission?

As a group, we would like to see research undertaken on the negative impact of gambling on vulnerable groups and communities, such as Pasifika peoples in Wellington City. As well, the better appraisal of the growing availability of online gambling should be made a priority and where feasible, regulation of gambling activities should be made a responsibility of Territorial Local Authorities (TLAs) instead of central government, where regulatory or mitigating responses can often be delayed and Not necessarily "fit for purpose" thereby reducing its effectiveness.



Respondent No: 79

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Q1. **Your name** Etienne Wain
- Q2. **Your email or postal address** [REDACTED]
- Q3. **Your phone number** [REDACTED]
- Q4. **You are making this submission:** as an individual
- Q5. **What is the name of your organisation** not answered
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid

Q8. What strengths does your preferred option have over the other options?

We need to decrease the number of pokies in Wellington. They prey on those of lower incomes and those with gambling addictions (often there is a large overlap between the two groups) and as such have no place in a fair and just society. Any good they do in the community through providing funding to community groups is outweighed by the negative impacts pokies have on individuals and families. A sinking lid is superior to the other options because it guarantees an eventual decrease in the number of pokey machines in Wellington, hopefully eventually to zero.

Q9. Is there any other information you want to include in your submission?

Ideally we'd be implementing a sinking lid AND decreasing the maximum number of machines for existing license holders at the same time, just to get rid of them faster. Actually, to this end my preferred option would be to get rid of them wholesale right now and end their hold over people in Wellington.



Respondent No: 83

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. Your name

Pene Hippolite

Q2. Your email or postal address

[REDACTED]

Q3. Your phone number

[REDACTED]

[REDACTED]

[REDACTED]

Q4. You are making this submission:

on behalf of an organisation.

Q5. What is the name of your organisation

Maori Basketball NZ Inc

Q6. Would you like to make an oral submission to the Councillors?

Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)

Q7. What is your preferred option?

Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

Support for local business, support for the local communities as the money is put back into the local community. Evidence tells us that the problem gambling rate is low, approx 0.1% and this has not changed over the last 10 years even though gaming machine numbers have been reduced by 25%. The funding given out \$61 million to the Wellington region over 2017 and 2018 has enhanced the lives on thousands of Wellingtonians and these funds will be reduced if we go to option A or B. Restrictive caps or sinking lid encourage people to go online and gamble, this means there is no supervision of gambling and can be done via credit cards, it does not generate grant funding or any taxation income and provides no support for local businesses. It is difficult if not impossible to get local sponsorship to cover the loss of grant funding. Only option C allows for small growth, where both A and B reduce growth and therefore funding. There is no evidence to change the status quo, individuals would not go out and spend the money elsewhere as adults go out have dinner and may play a little, it is seen as entertainment. Prohibition has never worked, people will just find other ways to gamble and sports, arts etc. will find it very hard to continue to provide positive and rewarding activities for the community.

Q9. Is there any other information you want to include in your submission?

Maori Basketball NZ Inc Background: Māori Basketball NZ run the largest Basketball tournament in NZ, in 2020 we had 240 teams attend from all regions of NZ and Australia, this equates to approx 5000 people attending this tournament, including special olympic athletes- we are the only mainstream Basketball tournament that have special olympics participants attend. Maori Basketball was established to provide an opportunity for: 1. An indigenous Maori National Basketball tournament for all Maori and their whanau (both Maori and Non Maori) to participate in. 2. To improve the physical fitness and wellbeing of families. 3. To provide a platform to change the norms of the New Zealand Basketball community and broader community to become more aligned to Te Ao Maori. 4. Create activities for Urban Maori to take part in Te Ao Maori. 5. To grow an international indigenous basketball calendar. 6. To grow Te Reo. 7. To build and align our kapa haka program for all to attend and present at. What we do know is that to build stronger, iwi, hapu and whanau connections, grow Te Reo and a sense of belonging within their communities: sports, physical activity and kapa haka have a huge impact. This tournament brings together those 3 key activities and allows Maori and non Maori to understand who they are and be proud of this. It is a powerful learning from the tournament. All communities, particularly Maori, that participate in sport and recreation develop strong social bonds, are safer places and the people who live in them are generally healthier and happier than places where physical activity isn't a priority. Our iwi train all year for this tournament and for many it is the highlight of the year. In 2020 our tournament was highlighted on both National and Maori television, highlighting the uniqueness of the tournament and the emphasis on Te Ao Maori. Breakdown of Ages/Teams 2019 2020 Kōtiro 59 66 Tama 82 97 Wāhine 18 18 Tāne 23 35 Open Mixed 14 14 Pākeke - Masters 45+ 4 8 Special Olympics 2 2 202 240 This tournament showcases Maori in a positive light and continues to grow each year. The tournament brings together whanau, hapu and iwi to display their talents both on and off the court. We have a kapa haka evening that all teams /iwi must perform at. Added to that a key of the tournament is to grow Te Reo and we are seeing evidence of this each year as more Te Reo is being spoken and our prize giving was in Te Reo Maori, along with some of our games that were live streamed. The cost to run this tournament each year and subsequent Maori Basketball events is in excess of \$300,000.00, we would not be able to run this event and keep the entry fee at a reasonable price to allow all of our iwi to attend (many come from lower socioeconomic areas and would miss out) without the help of grant funding. We work hard to keep our entry fee to a level that all can afford and all costs down, we have looked for sponsorship to help cover costs, but this is either non-existent or typically very hard to get. Funding is used to cover venue hire, provide our key referees with accommodation, cover staffing, first aid, medals, live streaming, resources for Te Reo Maori and the development of an App. We do not want any iwi, tamariki or kaumatua to miss out and evidence suggests that this tournament continues to grow with more Maori and non Maori (allowed to play in Open mixed grade only) attending each year. Many of our participants will not get to a Basketball NZ National Championship, this is there national championships. It means Mum, Dad, grand dad and the children can all be at the event to support each other and can all be playing, refereeing, score benching or supporting. An example of this was a grandfather who came to the event for the first time in 2020 and was able to watch his 14 children play at one place and time. Another is the young urban Maori boy who had a troubled life, knew he had Maori ancestry but did not know what this meant, he attended the tournament in 2019 and learnt about what being a young Maori meant, was surrounded by positive experiences and subsequently has put his life back on track. He would not have been able to attend without the grant funding support in his community and the funding support given to run the event. We have a huge number of these success stories and are happy to share them with you. The quality of basketball on display is also improving at a relative rate to our participation levels, as evidenced by a high number of NBL, former NBL players as well as Age grade and National Age Grade representatives distributed throughout our competition. Last year was the first year we added live streaming capabilities, we could not have done this without grant funding, and as such we only did it on 1 court, we had over 70k unique views across our tournament, which was a vastly higher number than we expected. We also used funding to debut tournament mobile administration app that helped the families of our participants identify easily, where the games were and when they were scheduled, as well as the results were in real time. The funding we receive from grant funding is critical for this tournament to continue, without it we would have to limit numbers, and iwi to be able to attend, at worst not run the tournament. Pene Hippolite General Manager, Māori Basketball Pene@maoribasketball.org.nz



Respondent No: 84

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

Q1. **Your name**

Tanya Piejus

Q2. **Your email or postal address**

[REDACTED]

Q3. **Your phone number**

[REDACTED]

Q4. **You are making this submission:**

on behalf of an organisation.

Q5. **What is the name of your organisation**

New Zealand Community Trust (NZCT)

Q6. **Would you like to make an oral submission to the Councillors?**

Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)

Q7. **What is your preferred option?**

Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. **What strengths does your preferred option have over the other options?**

See submission document sent separately.

Q9. **Is there any other information you want to include in your submission?**

See submission document sent separately.



Respondent No: 88

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. **Your name**

Lili Tuioti

Q2. **Your email or postal address**

[REDACTED]

Q3. **Your phone number**

[REDACTED]

Q4. **You are making this submission:**

on behalf of an organisation.

Q5. **What is the name of your organisation**

Salvation Army Newtown Worship and Community Centre

Q6. **Would you like to make an oral submission to the Councillors?**

Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)

Q7. **What is your preferred option?**

Option A: Implement a sinking lid

Q8. **What strengths does your preferred option have over the other options?**

It begins to reduce the number of pokie machines in the Wellington region as the gambling venues policy will prevent any new venue licences from being issued and prohibits relocation of pokie machines. The reduction in pokie machines over time will diminish the harm that problem gambling currently has on individuals, their families and the community at large.

Q9. **Is there any other information you want to include in your submission?**

not answered



Respondent No: 92

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Q1. **Your name** Marlene Levine
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Wellington Jewish Community Centre
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

Gambling in local venues has at least some level of supervision. Online gambling has no supervision, and I see there is more and more in the way of easily accessible online gambling opportunity. Gambling in local venues provides tax income and charitable donations. Online gambling does not. The Wellington Jewish Community Centre is a charitable trust. I am the chair of the WJCC Board of Directors. We have been the beneficiaries of grants from The Lion Foundation. I understand that their grants come from gaming machines at local venues, so we benefit from this. We benefit in a huge way, providing facilities for community members that we would never have without The Lion Foundation's help. The help we received from The Lion Foundation most recently allowed us to undertake the first stage of a long-term development project for our existing community facilities at 80 Webb St in Wellington. This project was long overdue, and includes fixing a leaking roof and removing asbestos. We depended on a grant from the Community Facilities Fund for most of the work, but there were some unforeseen items that were not budgeted for. We used the generous grant from the Lion Foundation to undertake 3 items: 1) get a new front door compatible with the upgrade of our security system, 2) insulate the parts of the roof we fixed, and 3) pay extra scaffolding hire that was incurred because of the COVID-19 lockdown. We could not have done this without the help of the Lion Foundation.

Q9. Is there any other information you want to include in your submission?

not answered



Respondent No: 94

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

- Q1. **Your name** Danny Muthumala
- Q2. **Your email or postal address** [REDACTED]
- Q3. **Your phone number** [REDACTED]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Sri Lanka Association of New Zealand (SLANZ) Inc
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

Option C provides continuous revenue to Lion Foundation to offer community grants to charitable organisations and other voluntary organisations in NZ. SLANZ is a Wellington based organisation serving the Sri Lankan Community since 2004. The Lion Foundation has funded \$2,000 to SLANZ every year for the past 10 years to pay off Tawa Community Centre and Linden Social Centre hall hire (owned by Wellington City Council). SLANZ cannot survive or continue with planned activities each year if funding is not available. Any alternative funding is not possible under the current economic situation in the country. If the gaming funding is reduced or suspended, SLANZ will not be able to serve the Community in Wellington.

Q9. Is there any other information you want to include in your submission?

SLANZ activities are heavily dependant on grants donors such as The Lion Foundation, Pub Charity, Hutt Mana charitable trust, Trust House, Pelorus Trust, WCC, PCC, Sargood Bequest and NZ Lottery Grants. SLANZ is a non profit, charitable organisation serving the Sri Lankan Community in Wellington since 2004. If SLANZ cannot obtain grants from The Lion Foundation to pay off monthly rental fees to Wellington City Council for the hire of Tawa Community Centre and Linden Social Centre for conducting Sri Lankan Cultural workshop classes for children and young adults, the activities will come to a halt as SLANZ cannot afford to pay monthly rental fee to Wellington City Council for the venue hire. There are two beneficiaries from grants received by Lion Foundation. They are SLANZ and WCC. All the money received from the Lion Foundation is paid back to WCC. Therefore I urge the WCC Councillors to reconsider their decision to continue with option C above for the benefit of the community. Thank you.



Respondent No: 96

[Redacted]
[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

Q1. **Your name**

Lisa Jones

Q2. **Your email or postal address**

[Redacted]

Q3. **Your phone number**

[Redacted]

Q4. **You are making this submission:**

on behalf of an organisation.

Q5. **What is the name of your organisation**

Wellington Hockey

Q6. **Would you like to make an oral submission to the Councillors?**

Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)

Q7. **What is your preferred option?**

Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

Wellington City Council Gambling Venues Policy P O Box 2199 WELLINGTON 6140 1st October 2020 RE: WELLINGTON CITY COUNCIL GAMBLING VENUES POLICY -WELLINGTON HOCKEY SUBMISSION INTRODUCTION Thank you for giving Wellington Hockey the opportunity to provide feedback on the above policy. This submission is on behalf of Wellington Hockey and our affiliated clubs and outlines our views on the proposed changes to the Gambling Venues Policy. The preferred position of the Hockey Community is Option C – No changes to the current arrangements relating to gaming machines and venues in Wellington. BACKGROUND Wellington Hockey is based at the National Hockey Stadium in Berhampore where we have three Hockey turfs that are the hub of our community. We provide Hockey opportunities to more than 4,000 Hockey players, 49 clubs, colleges and schools in the Wellington Region. Our clubs that are based in the Wellington City Council area are as follows: Island Bay Hockey Club Wellington Indians Sports Club Brooklyn Geckos Northern United Hockey Club Harbour City United Hockey Club Karori Hockey Club Karori Junior Hockey Club Tawa Titans Hockey Club Tawa Junior Hockey Club Victoria University Hockey Club Wellington Hockey prides itself on its vision and mission which are: Vision: Inspiring a lifelong love of Hockey Mission: Making great Hockey happen Our strategy statement is as follows: WHA is a trusted, reliable community partner. We are here to support our community. Benefits of Class 4 gaming to the Hockey Community The community funding model currently used to distribute Class 4 gaming is working well. The money we receive goes directly back to our community to ensure that our members can continue to enjoy the sport they love at a reasonable cost. If the Wellington City Council introduce a sinking lid policy to gaming machines, the amount of money our community can access will diminish over time. This will have a negative impact on what we as a Regional Sports Organisation can offer our community as well as what our clubs can offer their members. Currently some of the areas Class 4 gaming is helping the Hockey Community are: • Support for our power bills – we pay approx. \$60,000 per year in electricity with the majority going on floodlights. • Community programmes – funding we receive enables us to go into schools and introduce children to Hockey and provide Have a Go opportunities for many. • Contributing towards salaries, wages – we simply would not exist without the support received in this area. • Helping with the costs of our representative teams travelling to tournaments – without this support there would be many children who would not be able to participate. • Facilities – many upgrades to our facilities would not be possible without funding support. Many of our clubs apply for Class 4 gaming to help towards their training and game fee costs. This money is passed on to Wellington Hockey to help cover the cost of the lease fees charged by Wellington City Council for the hire of the National Hockey Stadium. This cost in 2020 was \$110,000. Any reduction in Class 4 gaming proceeds will have two significant outcomes: • Cost will become a barrier to participation which will result in a decline in people being able to enjoy our sport • The ability for Wellington Hockey and its clubs to be able to continue to pay for its facilities will be put under extreme pressure SUMMARY Whilst we acknowledge that the impact of problem gambling can be significant in the community, we also believe that the social benefits of sport and the people that we can impact cannot be underestimated. We see on a daily basis the importance of sport to people's health and wellbeing, and want to be able to keep providing this to our community without any more financial pressure than we already experience. CONCLUSION Wellington Hockey requests that the Wellington City Council retains the status quo – Option C on the Gambling Venues Policy. The impact that Class 4 gaming money can make on the Sport and Recreation sector, therefore on the health of Wellington's population cannot be put at risk by choosing any other option. Our submission is available on our website (www.wellingtonhockey.org.nz) and shared with our members. Kind regards Lisa Jones CEO, Wellington Hockey With support from Hutt United Hockey Club

Q9. Is there any other information you want to include in your submission?

not answered



Respondent No: 102

[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Drew James
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Creative Capital Arts Trust
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

To ensure that charitable organisations, providing essential community services, such as cultural and social wellbeing, education, sports and health are able to continue their delivery with the support of Gaming Trusts There is currently no discussion around viable alternative funding in a very challenging economic environment The current Covid-19 environment puts enormous strain on our services to deliver in an uncertain and challenging environment

Q9. Is there any other information you want to include in your submission?

Yes. This will be emailed separately to Jim Lewis to accompany the submission.



Respondent No: 104

[Redacted]
[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Terry Shubkin
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Young Enterprise
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

Q8. What strengths does your preferred option have over the other options?

The strength of t option C is that it provides certain continuity to the current funding streams for charities and community groups link Young Enterprise, the significant risk of a sinking lid policy is that the number of venues/machines could be reduced very quickly as a result of things like Covid-19 (lockdowns resulting in venues going out of business), moderate/large earthquake damaging buildings, etc.

Q9. Is there any other information you want to include in your submission?

A PDF version of this submission can be downloaded from the following link: <https://www.dropbox.com/s/wenl0yd8z5y1k/Letter%20in%20response%20to%20Gambling%20Venues%20Policy.pdf?dl=0>

Submission on Gambling Venues Policy Recommendation It is our strong recommendation to the Council to vote in favor of Option C: No change to the existing policy, or another change we haven't considered. Overview New Zealand is facing a substantial problem with our economy in the wake of Covid-19, and youth sit at the heart of both the immediate and long-term solution. The future of work was a hot topic prior to the impacts of the pandemic being felt, but now more than ever preparing and empowering our rangatahi to be successful in an ever-changing workforce is essential for the long-term prosperity of New Zealand. All key decision makers and organisations across Aotearoa have a responsibility to support the growth and development of work-ready skills in our youth for the benefit of all New Zealanders. Empowering our rangatahi to be innovative, business savvy, collaborative, and resilient, inspiring them to take risks, be leaders and be curious. It is now crucial to develop a workforce who knows how to pivot, be agile, can understand business and markets (national and global) and is able to identify opportunities. With a focus on the future leaders as well who are able and skilled job creators, mentors and entrepreneurial minded. The role of YES Our vision is to grow a more prosperous New Zealand through enterprise. At its heart, YES is about developing leaders, changemakers and disruptors. YES is part of the solution to the problem New Zealand is facing. Empowering our rangatahi with the skills, confidence, experience, and networks they need to thrive in business and in life will support the continued growth of a sustainable economy. Young Enterprise Trust is proud to have been working with secondary school students and teachers in Aotearoa for almost 40 years, supporting and inspiring the next generation of employees, leaders, and entrepreneurs. We are a national organisation employing 37 staff, with 14 of those based in our Wellington City HQ office. In 2020 over 4000 year 12 and 13 students from 200 schools took part in the flagship programme, The Lion Foundation Young Enterprise Scheme (YES). YES is an experiential programme

where students set up and run a real business, with real products or services created by them and real end of year profit and loss. YES is supplemented with a range of feeder programmes and extreme experiences. Outside of YES, Young Enterprise also provides free teaching resources to New Zealand teachers as well as free in person facilitated experiences such as the BP Business Challenge and Growing NZ Innovation Challenge. Our recommendation on the Gambling Venues Policy We whole heartedly believe in the current climate, that the benefit to community, local organisations and educational opportunities that gaming machines provide by feeding money back into the community far outweighs the low level of problem gambling in the Wellington region. We believe this is not the appropriate time to make changes to the Gambling Venues Policy, and recommend to the Council to vote in favor of Option C: No change to the existing policy, or another change we haven't considered. In this letter we will go over some of our background and, the effects that changes to the gambling venues policy would make to how we operate as an organisation. We will elaborate on this letter at an oral submission at a later date:

- Where our money currently comes from, how we spend it and, how a reduction in funding would affect us and our students
- Funding challenges in the current environment
- The outcomes we deliver

Where our money currently comes from, how we spend it and, how a reduction in funding would affect us and our students

Young Enterprise is a for-purpose charitable trust supporting the growth of New Zealand's future generation of workers, leaders, and entrepreneurs. As a charitable trust we are reliant on funding from Government, private organisations, individuals, and charitable trusts such as The Lion Foundation. The Lion Foundation has been a supporter of Young Enterprise Trust since 2001. Their funding currently makes up 16% of our annual income, this contributes greatly to our ability to make our programme equally accessible to as many New Zealand students as possible. For one student to participate in the Young Enterprise Scheme the cost for them is \$35, this gives them access to everything they will need from the start of the year long programme to the end, including in class support from our regional staff. Given we are a national charity with our head office in Wellington City, any reduction to our funding from The Lion Foundation as a result of reduced gaming funds being created in the Wellington region will not just impact our approximately 400 Wellington based students but our 4000+ students right across Aotearoa. At Young Enterprise Trust we have worked hard for many years to ensure our revenue streams are as secure and sustainable as possible. As a result our portfolio is very balanced with approximately one-third of our revenue being from corporate sponsorship, one-third from central government (cross department collaborations) and one-third from The Lion Foundation, other grants, donations and student fees. In practice it costs Young Enterprise Trust \$400 per student who participates in the programme, so in 2020 the programme cost \$1,600,000 to run and only \$140,000 of that was covered by student fees. At this stage any drop in funding will result in one of two things. 1. We will be forced to cut parts of our programme, resulting in us delivering a less transformative experience for our students, and to less students, or 2. We will be forced to raise the cost for students to participate in our programme making it significantly less accessible. Even a 10% drop in funding would require us to more than double the fee a student would have to pay to participate in our programme. We already know that in the lower socio-economic areas of Aotearoa some student already struggle to pay the \$35 fee, increasing this would limit even further the ability for some students to benefit from this valuable learning and personal growth experience. Funding challenges in the current environment COVID-19 has already had an impact on how we operate now and will have to operate in the future. We have already received a drop in financial support from two organisations as a result of the pandemic, as well as one of our sponsors withdrawing their sponsorship entirely for the 2021 financial year. We also realise that this is just the start, and there will almost certainly be a further reduction in our sponsorship/funding revenue as the true impacts of the economic climate are felt. As a charity we are constantly on the lookout for new funding opportunities to improve our programmes for the betterment of our students. Funding conversations we had been having prior to COVID-19 as well as new opportunities have become increasingly more difficult to get across the line, and we know we are not the only not for profit organisation facing these same challenges. The Lion Foundation provides us with a much-needed financial contribution towards the overall operation of our organisation – they support the 'non-shiny' things that allow us to function behind the scenes, things that others won't sponsor or fund. The outcomes we deliver Over the past 40 years YES really has created well-equipped and driven young businesspeople, and we have the numbers to prove that they have gone on to make a positive contribution to New Zealand. For a small, lean charity we offer many opportunities for rangatahi across New Zealand and always have plenty going on. Most people know of our flagship programme The Lion Foundation Young Enterprise Scheme (YES) where senior secondary students set up and run their own business, but what a lot of people don't know is the depth and breadth of what we do, over the past few years:

- 29,724 students took part in our flagship programme, YES between 2010-2019
- 10,392 YES resources have been downloaded in the past 12 months
- Since 2015 2,104 Pasifika students have participated in YES, 476 of those are registered this year
- Since 2015 3,332 Māori students have participated in YES, 752

of those are registered this year • 85% of alumni would recommend YES to current students • 69% of alumni say that YES positively influenced their decision-making process post-secondary school • 86% of alumni did tertiary study, of which 67% studied business Summary and our recommendation We are lucky enough to see firsthand the positive community outcomes achieved from Gaming Trust funding, we can also confirm that the loss or reduction of this funding would be catastrophic for Charities like ourselves. Although our revenue portfolio is balanced, seeking and securing new revenue streams takes many hours of work, negotiation and attempts and is often still unsuccessful – this is and will continue to be the case even more so with the economic effects of the pandemic still to be felt – although we never stop trying. It is our strong recommendation to the Council to vote in favor of Option C: No change to the existing policy, or another change we haven't considered. Submitted by: This letter has been prepared and submitted by Young Enterprise Trust, a registered charity in New Zealand since 1986 (charities registration number CC21103). Any questions can be directed to: Terry Shubkin Chief executive officer Email: terry.shubkin@youngenterprise.org.nz Phone: 021 611 312 Ngā mihi mahana, Terry Shubkin



Respondent No: 107

[Redacted]
[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Paul Barber
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** as an individual
- Q5. **What is the name of your organisation** not answered
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid

Q8. What strengths does your preferred option have over the other options?

I strongly support the Council's preferred option, Option A to implement a sinking lid policy that allows no new venues or machines in Wellington. It is heartening to see the information provided by the council that shows how the number of gaming venues and machines has been declining over recent years. Implementing a clear sinking lid policy will help preserve these gains and ensure that the number of these machines continues to decline.

Q9. Is there any other information you want to include in your submission?

I would like to emphasise that a true sinking lid policy should also apply to TAB venues (p.5 paragraph 5.1) and not allow any transfers or relocations of machines or mergers of licenses. This is contrary to what is stated on p.4 of the Statement of Proposal document that says "provide for relocation of Class4 venue licenses in certain circumstances". The current policy of a cap on venue numbers is not sufficient to achieve genuine progress in reducing the number of machines and the associated gambling harm. The cap proposed under Option 2 of 660 is actually higher than the number of machines that currently exist (633) so it is not actually even a genuine cap. Option 2 would not achieve the Council's legal role "to manage the risk of gambling harm to the extent this can reasonably be done" (p.4). Implementing the sinking lid policy will not have an immediate large impact of associated community funding sourced through gambling trusts. This will allow time for other sources of funding to be sought by community groups and Wellington City Council that do not involve inflicting the level of harm that Class 4 gambling does on people in our city.



Respondent No: 108

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[Redacted]

[Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

- Q1. **Your name** Brad Olsen
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** Wellington City Youth Council
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid

Q8. What strengths does your preferred option have over the other options?

Noting that harms of gambling, and the amount of money that is used on these activities that cannot therefore be spent by households, Youth Council views it as desirable to reduce the potential for gambling to occur by adopting a sinking lid policy on Class 4 gambling machines. This sinking lid policy will stop any additional gambling machines from operation and will over time see the number of gambling machines fall.

Q9. Is there any other information you want to include in your submission?

As there is no option to upload a document, I will email Youth Council's full written submission to Jim Lewis. We would ask that this document is considered as our submission.



Respondent No: 110

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Q1. **Your name** Niall Miller
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** [Redacted]
- Q4. **You are making this submission:** on behalf of an organisation.
- Q5. **What is the name of your organisation** TAB New Zealand
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option C: Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:
- Q8. **What strengths does your preferred option have over the other options?**
Please refer to the attached
- Q9. **Is there any other information you want to include in your submission?**
Please refer to the attached



Respondent No: 113

[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]

- Q1. **Your name** Fuailalagi Samoa Saleupolu Heger
- Q2. **Your email or postal address** [Redacted]
- Q3. **Your phone number** not answered
- Q4. **You are making this submission:** as an individual
- Q5. **What is the name of your organisation** not answered
- Q6. **Would you like to make an oral submission to the Councillors?** Yes (Please ensure you provide your phone number so that an oral hearing time can be arranged)
- Q7. **What is your preferred option?** Option A: Implement a sinking lid
- Q8. **What strengths does your preferred option have over the other options?**
not answered
- Q9. **Is there any other information you want to include in your submission?**
I would like the Council to include TAB venues, no relocations, and no mergers as part of the sinking lid policy.

(14)

Dear Wellington City Council,

I am writing to express my concern about the enormous harm caused by pokies and to urge you to adopt a SINKING LID POLICY for the Gambling Venues Policy decision.

I know personally through my church several people who are or have been addicted to pokies. It destroys lives. We have a duty to find a way to fund our community groups that does not rely on capitalizing on addicts' helplessness before machines that are designed to prey on their addiction, planted throughout our poorest neighborhoods. Pokies result in great waste, great suffering, and hungry, neglected children.

I have participated in various arts groups funded through gambling. But I do not want this to continue. I would find time myself to support hobbies, and firmly believe we can and must find other ways.

I support, within a sinking lid policy, a ban on relocations and mergers

I am willing to make an oral submission if possible →

I have observed the harm these machines cause, and additionally, the statistics confirm that the amount lost in poor neighborhoods, daily, is staggering. The fact that a part of it (far from all of it) is used to fund hobbies in middle class suburbs is of little comfort.

Change is not easy, but we have to change this. Our society cannot rely on something that is actively destructive to some of its most vulnerable members. I fully support a smoking bid policy, with a ban on relocations + mergers of poker machines.

Yours sincerely,

Phoebe Wright



Gambling Venues Policy consultation

15

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Your views on the Gambling Venues Policy will help inform councillors and help finalise the new Gambling Venues Policy.

The Council will consider your feedback and the new policy, if adopted, will come into effect from 1 December 2020.

Submissions close at 5pm on Thursday 1 October 2020.

Your details

Your name*	Bernard O'Shaughnessy
Your email or postal address*	[REDACTED]
You are making this submission	
<input checked="" type="checkbox"/> as an individual	
<input type="checkbox"/> on behalf of an organisation. Your organisation's name*	
I would like to make an oral submission to the Councillors	
<input checked="" type="checkbox"/> Yes	
<input type="checkbox"/> No	
If yes, please give your phone number so that a submission time can be arranged*	

*mandatory field

What is your preferred option?

<input type="checkbox"/> Option A Implement a sinking lid
<input type="checkbox"/> Option B Lower the caps on the maximum number of machines by 87, align zone names to the 2019 Representation Review and reinstate the Primary Activities Clause
<input checked="" type="checkbox"/> Option C Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is: ① Reduce Pokie machines by 50%. ② Redistribute equally across all wards ③ Fund sports/Art facilities to replace Pokie funds eg. spend the \$4m per month now being lost on hawm!

What strengths does your preferred option have over the other options?

It's time to have a new focus
and stop sports funding being at
expense of poor people.

Is there any other information you want to include in your submission?

YES - I will be tabling a
full submission before Council,
so this is just a para forming note.

Free Post WCC

**Absolutely Positively
Wellington City Council**

Me Heke Ki Pōneke

Free 



1/5
FREEPOST 2199
259/1001

Gambling Venues Policy - 2591001
PO Box 2199,
Wellington 6140

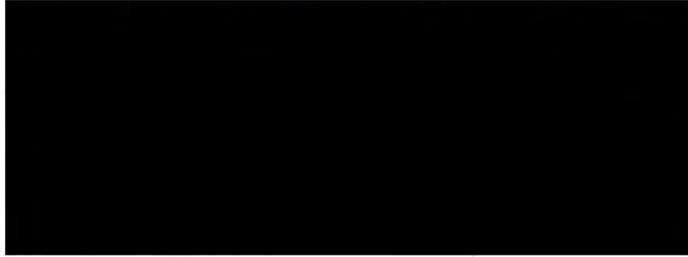


13 Sept 2020

16

GAMBLING VENUES POLICY - SUBMISSION

Steven Woodward



NEWTOWN
WELLINGTON

I support the SINKING LD proposal,

I am a recovering compulsive gambler. I have seen first hand the amount of pain and brokenness it causes. I would sit at the pokies machine for several hours. I don't want any more Pokies in Newtown or anywhere else.

I have seen the devastating affects of gambling and the harm it does. We used to constantly have arguments about gambling and money in our family. I was even kicked out of home.

Please think about the devastation that your council will be doing if you put more pokies in pubs.

I would like to make an oral submission.

Steven Woodward

18



Have your say on pokies in Wellington

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

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

If you require a special private hearing where your identity will be protected and you have experienced gambling harm, please contact PGF Group on: 0800 664 262.

Wellington City Council is seeking feedback on its proposed gambling venues policy for electronic gaming machines, more commonly known as 'pokies'. The Council's current policy limits the number of machines in certain areas, but we would like the policy to include a 'sinking lid'. That means no new pokie venues would be able to open in the Wellington area. We think a sinking lid is the most effective way to reduce the number of pokies over time and prevent gambling harm.

Why is this important?

Currently Wellington City has 633 pokies across 40 venues. In 2019, people in Wellington lost over a staggering \$40 million on these machines.

Some people support pokies because the gambling losses are used to fund community groups. But only 40% of the losses are returned to the community.

Pokies are highly addictive machines and are the most harmful form of gambling. It is estimated that 30% of the money lost on pokies comes from people experiencing harm. Pokies outside casinos make up almost 50% of the people who seek help about their gambling. The National Gambling Study found in 2015 that 8.2% of the adult population used pokies in pubs once a year and 3.7% in clubs. This means that most of the community funding generated with pokies is coming from a small number of people. Pokie machines in Wellington are clustered in medium deprivation areas where people can least afford to lose significant amounts of money.

What needs to happen?

We are asking the Wellington City Council to implement a sinking lid policy. That means the Council will refuse any pub or club that applies to host pokies.

We know that Wellington City Council can do the right thing and listen to the people in their community. The council can make the changes to respond to the harm pokies are causing and introduce a sinking lid policy.

Please use this form to make a submission to the Wellington City Council. Submissions are open until **1 October 2020**.

What do you think? Have your say! Submissions close 1 October 2020.

For full details about the Council's proposed policy read here: <https://www.letstalk.wellington.govt.nz/waste-by-law>

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

Contact name* First David Last Hank

Address* [Redacted]

City Wgtn State / Province / Region [Redacted]

Postal / Zip Code [Redacted] Country [Redacted]

Phone* [Redacted] Email* [Redacted]

If representing an organisation: Organisation name [Redacted]

Position/title [Redacted]

Have your say on pokies in Wellington



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

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

If you require a special private hearing where your identity will be protected and you have experienced gambling harm, please contact the Problem Gambling Foundation on the confidential phone line: 0800 664 262.

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Why is this important?

Currently Wellington City has 633 pokies across 40 venues. In 2019, people in Wellington lost over a staggering \$40 million on these machines.

Some people support pokies because the gambling losses are used to fund community groups. But only 40% of the losses are returned to the community.

Pokies are highly addictive and are the most harmful form of gambling. It is estimated that 30% of the money lost on pokies comes from people experiencing harm. Pokies outside casinos make up almost 50% of the people who seek help about their gambling.¹ This means that most of the community funding generated from pokies is coming from a small number of people. Pokie machines in Wellington are clustered in medium deprivation areas where people can least afford to lose significant amounts of money.

What needs to happen?

We are asking the Wellington City Council to implement a sinking lid policy. That will mean the Council will refuse any pub or club that applies to host pokies. Over time, perhaps several years, pokies will be phased out as existing venues cease to host pokies.

We know that Wellington City Council can do the right thing and listen to the people in their community. The council can make the changes to respond to the harm pokies are causing.

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Contact name* First Robert ~~Lee~~ Last Lee

Address* [Redacted]

City Porirua State / Province / Region Wellington

Postal / Zip Code 5024 Country New Zealand

Phone* [Redacted] Email* [Redacted]

If representing an organisation: Organisation name N/A

Position/title N/A

Submission

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- 1. PO Box 2199, Wellington 6140
- 2. (NB. This is not a freepost)

Have your say on pokies in Wellington

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- A true sinking lid on pokies that includes TAB venues with NO relocations and NO mergers.
- Please tick if you are willing to appear before the Wellington City Council to give an oral submission.
- Please tick this box if you would like to give an oral submission and be anonymous.

I think this is needed because: People continuously struggle
over there are already a lot
of machines in the community.
Putting a cap on the number of
machines will definitely help
the communities who have
a lot of access to machines
to minimize the money put
into the machines.

I am happy to speak on
my own experiences too in hopes
it may help someone out there
going thru the same struggles

¹ Ministry of Health Manatū Hauora. (2019). Intervention client data. Retrieved from

www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data

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Contact name* First Akesa Last Taurua

Address* [REDACTED]

City Wellington State / Province / Region Tawa

Postal / Zip Code 5028 Country New Zealand

Phone* [REDACTED] Email* _____

If representing an organisation: Organisation name _____

Position/title _____

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Contact name* First TOFA Last FAGALOA

Address* [REDACTED]

City WELINGTON State / Province / Region _____

Postal / Zip Code 6023 Country _____

Phone* [REDACTED] Email* [REDACTED]

If representing an organisation: Organisation name _____

Position/title _____

Submission

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- Please tick if you are willing to appear before the Wellington City Council to give an oral submission.
- Please tick this box if you would like to give an oral submission and be anonymous.

I think this is needed because:

Pacific Island population
over-represented in gambling.
Social impacts on families
Inter generational effects eg.
abuse / family violence
Economic impacts (negative)
Break down of family units.

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Contact name* First Lench Last Matagi

Address* [REDACTED]

City Porirua State / Province / Region Wellington

Postal / Zip Code 5024 Country NZ

Phone* [REDACTED] Email* [REDACTED]

If representing an organisation: Organisation name [REDACTED]

Position/title [REDACTED]

47

What needs to happen?

We are asking Wellington City Council to implement a sinking lid policy. That means Council will refuse any pub, bar, or club that applies to host pokies.

We know that Wellington City Council can do the right thing and listen to the people in their community. Council can respond to the harm pokies are causing by introducing a sinking lid policy.

What do you think? Have your say! Submissions close 1 October 2020

Full details of Council's proposed policy are [here](#)

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CONTACT DETAILS

First name* Tavita Jnr

Last name* Tuifao

Address* [Redacted]

Phone* [Redacted]

Email* [Redacted]

Organisation name if representing an organisation:

Name Porirua Whanau Centre

Position/title Porirua family violence prevention co-ordinator

If you have experienced gambling harm or for any reason you require a special private hearing where your identity will be protected, please contact PGF Group on 0800 664 252.

Have your say on pokies in Wellington

SUBMISSION

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BECAUSE:

Hard copy submissions can be returned to the following addresses:

1. PO Box 2199, Wellington 6140
2. (NB. This is not a freepost)

Freephone: **0800 212 122**
Email us: **help@mapumaia.nz**
Website: **www.mapumaia.nz**

Mapu Maia Wellington Office
Level 5, 148 Cuba St, Wellington 6011
PO Box 6506, Marion Square, Wellington 6141

Have your say on pokies in Wellington

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Contact name* First Anetorea Last Sain

Address* [REDACTED]

City Wellington State / Province / Region L/Hutt

Postal / Zip Code 5014 Country New Zealand

Phone* [REDACTED] Email* [REDACTED]

If representing an organisation: Organisation name Church of the Nazarene

Position/title Pastor



ASB Sports Centre
72 Kemp Street
Wellington 6022

16 September 2020

Sent via email
Policy.submission@wcc.govt.nz

The Review of the Gambling Venues Policy: Submission form

dsport (previously known as Parafed Wellington) is a **charity** managed by a board of elected volunteers, which was established in 1969.

Our vision is for Wellington to be a diverse and inclusive region.

dsport is underpinned by the principles of
inspire, enable, achieve

1 in 4 people in New Zealand identify as disabled

95,000
young people (0-14 years)

We inspire disabled people to believe in themselves. To aspire to being involved in sport and active recreation. To dream.

We enable disabled people to get into sport and active recreation. We don't believe in can't. Rather how can we. How can we make this fun and make this work? We persevere and we build strength collectively.

But more importantly, our members achieve. They overcome adversity, find work-arounds and creative solutions to achieve. And for some, they will achieve their dreams.

Sport New Zealand (2018) in their *Value of Sport* report stated "sport and active recreation creates a happier, healthier people, better connected communities and a stronger New Zealand" and that sport is 'in our DNA'.

25 percent of New Zealanders identify as disabled (Statistics New Zealand, 2013).

Article 30 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) explicitly requires countries, including Aotearoa New Zealand, to take appropriate measures to encourage and promote disability-specific sport.

In the recently published Sport NZ strategic direction *Every Body Active* (Sport New Zealand, 2019b), **disabled people were identified as a priority group, given their lower participation rates in sport and active recreation.** Peter Miskimmin, CE of Sport NZ has stated "we want a system that is equitable and where disabled people can be as active as non-disabled people".

We are a membership-based organisation, with 200 disabled people (aged 5 years and older), their family and whanau as members. Many of our members are not in a position to pay for our services. Our annual **membership fees** account for only **2% of our income.** **We rely upon contestable funding from gaming trusts, government and local community funding to deliver our services and programmes.** The majority of our funding comes from gaming trusts.

Gambling problem acknowledged

We acknowledge there is a negative impact of gambling. The 0.5% of gamblers (we understand there are 44 in Wellington City who have excluded themselves from venues) who do have a problem need help and assistance with this addiction, however, we understand 1.3% of Class 4 profits are allocated to addressing this issue. We support the continued funding to address this issue.

We also believe there has not been any significant decline in the number of problem gamblers resulting from the implementation of the sinking lid policy in other Territorial Local Authority areas. We see this proposed policy of Wellington City Council as a blunt instrument, the efficacy of which is questionable.

Celebrating the community benefit

Especially for small community organisations, reliance on Class 4 funding is the sad reality of sport, recreation, community service delivery in New Zealand. **Gaming has been supporting sport for over 60 years – it started with Golden Kiwi.** It is not a new phenomenon.

Gaming comes in many forms in our country, most noticeably racing is televised and TAB odds are often discussed before major sporting events, and Lotto NZ product ads are beamed into our living rooms. In the 2019 Lotto Statement of Intent, the sales target for **2021/22** is set at **in excess of \$1.4 billion.** More readily available at supermarkets and dairy's, Lotto "sells the dream" and actively promotes where the profits go and the communities which benefit.

Unfortunately Class 4 gaming providers are legally prohibited from doing similar, so here are some examples of where the **\$61+ m** Class 4 funding goes to in Wellington:

Essential emergency services:

- Life Flight Trust Rescue Helicopter
- Wellington Free Ambulance
- Wellington Coastguard
- Surf Lifesaving Clubs

Support a range of conservation and arts:

- Wellington Zoo
- Zealandia
- NZSO
- NZ Ballet
- NZ School of Dance
- Circa Theatre

Enable us to celebrate the fabric of Wellington City

- Cuba Dupa
- NZ Festival of the Arts
- Dragon boat Festival
- Chinese New Year Festival
- Te Matatini Kapa Haka Aotearoa

For dsport, it provides our members with the following:

- Wheelchair Rugby - training & competition
- Boccia - training & competition
- Hosting competitions in our region - Wheelchair Rugby and Boccia
- Our Youth Group (5-18 year olds) to participate in over 20 active recreation activities a year, ranging from rock climbing, ice skating, circus hub, athletics
- For our young members to participate in the Sport Wellington Round the Bays and the Sanitarium Weet-bix Tri annually
- Our team of 12-14 young disabled athletes to attend the Halberg Games in Auckland annually – the only dedicated sporting event for young disabled New Zealanders

“Competing at the Halberg Games ... has opened up doors to many more opportunities for me to pursue. I’ve gained confidence that through my challenges I can do anything I want to do. It’s been great to see the smiles, hear the laughter and see everyone so happy at the games. It’s about enjoying each other’s company and knowing you are “equal”. TP (17 years)

We are the only organisation in Wellington providing sport and active recreation programmes and services to physically disabled members of our community.

These funds allow us to collaboratively work with

- Peke Waihangā Artificial Limb Service – working with young amputees to get them activity blades to increase their mobility and engagement in sport and active recreation
- Paralympics New Zealand – our high performance pathway for Para athletes
- Massey University – designing clothes suitable for different types of physical impairments
- Wellington City Council – helping make Wellington City accessible for all

- Sport Wellington – helping make Wellington sport accessible for all and role modelling disability sport

“The day provided a big boost to our daughter’s confidence. Being alongside other kids that are amputees put her on a level playing field and made her realise that she is fortunate to be so physically able”.

Mum of a 13 year old girl

WCC Sinking Lid Proposal

1. From dsport’s perspective, any change of gaming policy needs to be considered within the wider context of total social wellbeing not just problem gambling. dsport believes without fully identifying the wider positive societal impacts of Class 4 funding, any policy decision is inherently flawed and unbalanced.
2. The proposed WCC policy identifies the impact of problem gambling and proposes solutions to address this issue but neglects to address any consequential outcome of policy change on wider social issues.
3. Namely, if the location and number of NCGMs are reduced, what are the impacts on income generation from the machines and the income distribution into the community and the organisations like those mentioned above?
4. What opportunity cost is WCC prepared to accept with changes in gaming venue policy vs continued delivery of sport and recreation within the community?
5. If WCC’s policy change results in a reduction of funding to community groups, **WCC must accept the financial consequence** in lower income distribution to the community and underwrite the difference – such as the Government did when the SmokeFree legislation was implemented. Does WCC believe rate-payers would accept further rates rises to offset this decision?
6. Regardless of your party politics and whether you agree or not with **Class 4 funding going to the community**, it does and it is the financial reality for most sport and recreation organisations. The issue to be addressed is whether the greater societal benefits from Class 4 funding outweigh the smaller negative effects of problem gambling. We believe it does so.
7. The onus on WCC is to ensure the opportunities presented to the community by NCGM and gaming funding are best utilized and as such any policy must consider all possible outcomes of the proposed policy decisions.
8. Given the arguments above: **dsport does not agree with the proposed sinking lid policy and believes the status quo should remain.**

To dsport the message we are hearing from WCC is it's OK for:

- disabled people to miss out on sport and active recreation
- disabled kids not to have any opportunities to experience what other kids often take for granted
- WCC to not accept its duty under the UN Convention on the Rights of Persons with Disabilities
- WCC is content to continue to marginalize and stigmatize a large sector of our community

With Class 4 funding it means our members can inspire, enable and achieve.

“He’s an active young man, who loves various activities such as swimming, boogie boarding, bush walks etc. He used to play soccer several years ago but unfortunately his condition prevents him from playing team sports like this these days... or so we thought!

(He) absolutely loved playing Powerchair Football! It was awesome watching him and the others out there playing a sport in which the playing-field was levelled for all of them - possibly for the first time in their lives. By the end of the day not only did (he) and the others have beaming smiles, they all looked really satisfied about being able to get stuck into a sport competitively.

I think participating in a team sport is so important for kids and adults alike. Learning how to be part of a team, and working towards a common goal is a key skill to have in life and it helps foster/develop self-confidence.

We would love to help support (him) follow and develop this new found passion of Powerchair Football and be part of a team.”

Dad of an 8 year old boy

We will not be able to support this young boy’s aspirations to participate in a new sport – Powerchair football – if we do not receive Class 4 funding next year.

The challenge dsport leaves you with is ... are WCC Councillors prepared to tell this young boy and his parents, he is not worthy of their support? That he should not be inspired, he should not be enabled and that he should not be able to achieve?

dsport would like to present this submission in person.

Yours sincerely



Catriona McBean
Manager

The Gaming Machine Association of New Zealand's Submission on Wellington City Council's Gambling Venue Policy



Big Brothers Big Sisters
of Wellington
Tuakana Teina



Contact Persons:

Mike Knell
Acting Chair
Gaming Machine Association of NZ
Mike.Knell@nzct.org.nz
027 280 2063

Jarrold True
Counsel
Gaming Machine Association of NZ
jarrod.true@truelegal.co.nz
027 452 7763

The Gaming Machine Association of New Zealand's Submission on Wellington City Council's Gambling Venue Policy

Introduction

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

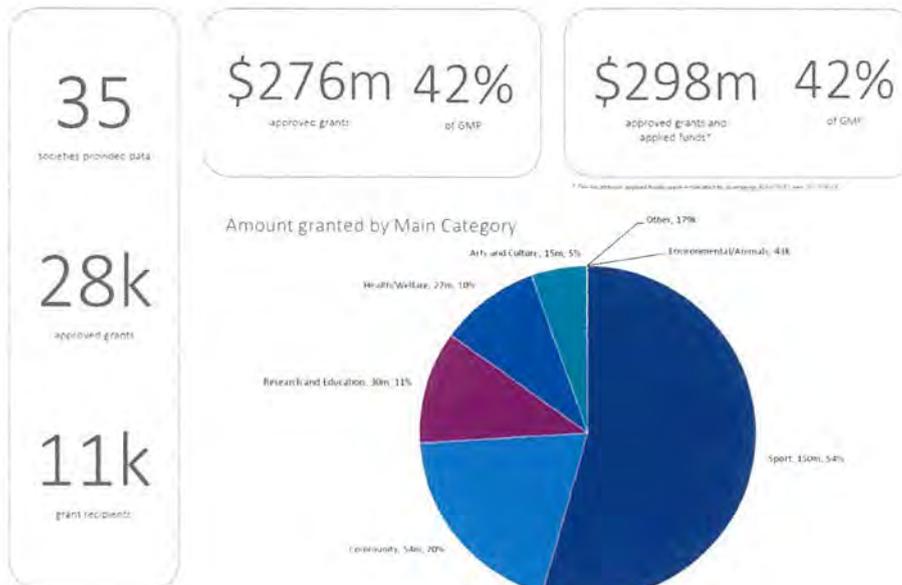
Summary

2. The Association supports the status quo caps (option C). The Association opposes the introduction of a sinking lid policy.
3. The Association asks that the current relocation provision be expanded to enable venues currently located within the Central Area Zone to relocate within the Central Area Zone.

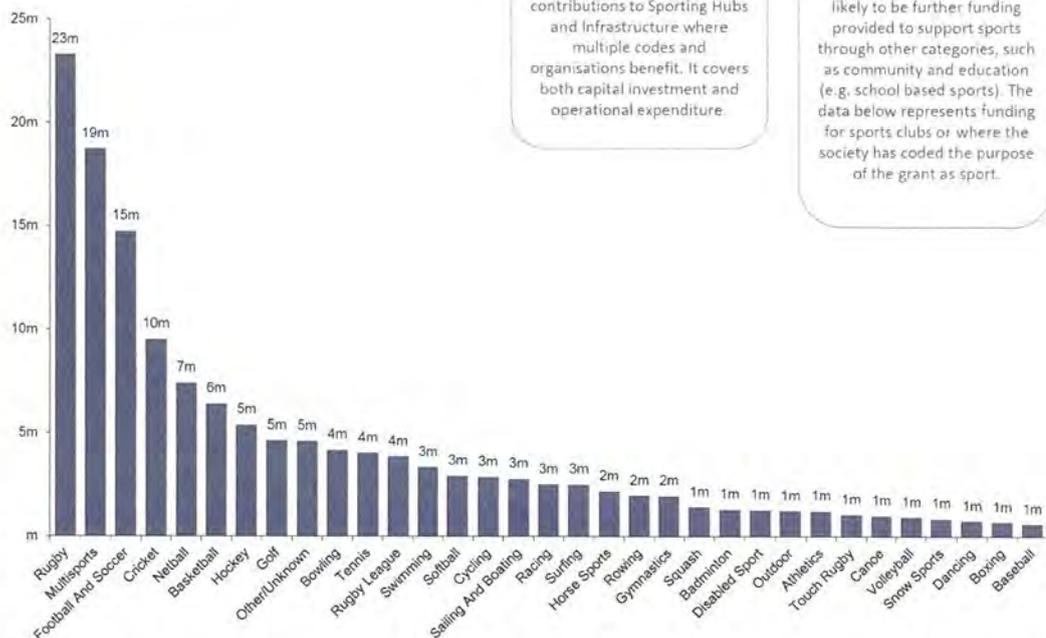
Gaming Machine Funding

4. The Gambling Act 2003 seeks to balance the potential harm from gambling against the benefits of using gaming machines as a mechanism for community fundraising. In 2018, approximately \$276m of grant funding was approved across 28,074 grants to 10,853 different organisations.¹ In addition, over \$71m was applied by TAB New Zealand (\$14m), Youthtown (\$8m) and various RSAs and Workingmen's Clubs (\$50m) to support their own activities. In total, 54% of the grants distributed in 2018 were sports related. The second most popular category was community (20%). This funding is crucial.

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



Amount granted by Sport



- In 2017 and 2018, gaming grants totalling approximately \$61 million were made to community organisations based in the Wellington region.
- The total authorised purpose funding (including the non-published club authorised purpose payments) received from Wellington City-based venues in 2019 was over \$16.29 million. Examples of recent local grants include:

\$41,400.00 to Wellington East Girls' College



\$26,900.00 to Age Concern Wellington Incorporated



\$88,800.00 to Lyall Bay Surf Life Saving Club Incorporated



\$90,000.00 to Toitu Poneke Sports & Community Centre



\$47,000.00 to Creative Capital Arts



\$111,800.00 to Wellington Free Ambulance Service



\$43,500.00 to Rongotai College



\$110,800.00 to GOYANZ Incorporated



7. The total grants amount quoted by the Problem Gambling Foundation is less than the \$16.29 million stated above, as the Problem Gambling Foundation's data is gathered from society websites, and not all societies publish their authorised purpose payments. The funds applied and distributed by club societies, for example, are not published. Further, if the grant recipient's name does not indicate that it is located within the territorial

authority, the amount of that grant is not included in the Problem Gambling Foundation's figures.

Other Benefits from Gaming

8. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2018 Health and Lifestyles Survey² found that 67.2% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,650,000 adults).
9. In the 2019 calendar year, Wellington-based non-casino gambling contributed \$15.06 million to the government by way of taxes, duty and levies.
10. In the 2019 calendar year, the gaming machine industry paid approximately \$6.51 million to Wellington-based hospitality businesses, thus supporting local employment and business growth.

Revenue Breakdown

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

Typical Distribution of Gaming Machine Profits

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	0.78%	0.90%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.83%	43.5%

Gaming Machines – Key Facts

12. Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, 32 years ago.
13. Gaming machine numbers are in natural decline. In 2003, New Zealand had 25,221 gaming machines. In June 2020, New Zealand had 14,847 gaming machines.

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

14. In 2004, Wellington city had 75 venues. Currently, Wellington city has only 40 venues.
15. New Zealand has a very low problem gambling rate by international standards. The New Zealand National Gambling Study: Wave 4 (2015)³ found the problem gambling rate was 0.2% of people aged 18 years and over. The problem gambling rate is for all forms of gambling, not just gaming machine gambling.
16. The Ministry of Health records the number of people who seek help for problem gambling from each territorial authority. This includes the people who use the helpline, text service, or obtain face-to-face counselling. Compared with other cities of similar size, Wellington City has an extremely low problem gambling rate. In the year July 2017 to June 2018 (the most recent data available) 63 new persons from Wellington City sought help for problem gambling. Wellington has a population of 214,537 people. In contrast, in the same period, 103 new people from Hamilton City sought help for problem gambling. Hamilton has a population of 209,406.
17. All gaming machine societies contribute to a problem gambling fund. This fund provides approximately \$20 million per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring-fenced and not able to be redirected to other health areas.
18. An excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year. Free, confidential help is available in 40 different languages. Free face-to-face counselling is also available and specialist counselling is available for Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

Existing Gaming Machine Safeguards

19. The current policy is appropriate given the significant measures that are already in place to minimise the harm from gaming machines.
20. Limits exist on the type of venues that can host gaming machines. The primary activity of all gaming venues must be focused on persons over 18 years of age. For example, it is prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas.
21. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
22. There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is \$2.50. The maximum

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

prize for a non-jackpot machine is \$500.00. The maximum prize for a jackpot-linked machine is \$1,000.00.

23. All gaming machines in New Zealand have a feature that interrupts play and displays a pop-up message. The pop-up message informs the player of the duration of the player's session, the amount spent and the amount won or lost. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.
24. Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
25. ATMs are excluded from all gaming rooms.
26. All gaming venues have a harm minimisation policy.
27. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
28. All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.
29. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
30. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
31. It is not permissible for a player to play two gaming machines at once.
32. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
33. The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).
34. It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

Burden of Harm Report

35. In May 2017, a report titled *Measuring the Burden of Gambling Harm* was produced for the Ministry of Health. In the report, "low risk" gambling, such as buying a Lotto ticket, was claimed to be as bad for a gambler's health as the untreated amputation of a leg,

while “problem gambling” was claimed to be as bad as suffering from a severe stroke or terminal cancer.

36. A review of the study’s methodology produced by TDB Advisory⁴ concludes that these outlandish comparisons were made possible by a long line of deliberate selection biases and errors. The errors revealed by the TDB Advisory review include either deliberately or by mistake: using a biased population sample (participants were not randomly selected); attributing all harms to gambling and none to associated behaviours (such as smoking); and treating all harm as stemming 100% from gambling rather than allowing for the use of gambling as a coping mechanism or as a symptom of harms rather than the cause.
37. The Association has called for the report to be officially withdrawn, or to be subject to an official warning against its use.

A Concern with How Gamblers Spend their Disposable Income

38. The Salvation Army and Problem Gambling Foundation recently released a report commissioned from the New Zealand Institute of Economic Research suggesting that there would be significant economic benefit to the retail sector in both income and job creation if spending on gambling was halted. The report claims that this extra retail spending would generate an additional 1,127 full-time equivalent jobs for 1,724 workers, along with an additional \$58m of GST revenue and additional income tax of \$7m from the retail spend.
39. The report, however, fails to take into consideration the economic value currently generated by the gambling sector. The report specifically acknowledges that this was outside its scope. It is therefore a misrepresentation of the net value of such a move, given that it takes no account of the value that would be lost. What the Salvation Army and Problem Gambling Foundation appear to be saying is: let’s take money – and jobs – away from the charity and not for profit sectors – health and rescue, education, community and social support services, environment, and arts and heritage – and give it to the commercial sector.
40. A suggestion is also made that the increased retail spending would then result in the retail sector channelling their increased profits into things like sports sponsorship. It is, however, more likely that any increased profits from the retail spending would be retained by the business owners, many of whom are large corporates, based offshore.
41. The report fails to address the freedom of adult New Zealanders to do what they want with their discretionary spending. Ministry of Health data indicates that over 1.8 million adult New Zealanders enjoy spending their money on gaming machines, Lotto, Instant Kiwi, sports and track betting and other forms of gambling. That spending provides them with entertainment, relaxation and social interaction. Those benefits would be lost if people were not able to spend their money on gambling.

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

The “Costs of the System”

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

The Current Policy is Reasonable

43. The current policy is reasonable, given the current environment of high regulation and naturally reducing machine numbers.
44. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last ten years, the problem gambling rate has remained the same, despite gaming machine numbers declining rapidly (4,618 gaming machines have been removed from the market).
45. The 2012 National Gambling Survey⁵ concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report stated on pages 17 and 18:

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

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

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

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

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

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

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

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

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

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

48. A more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups in Wellington City. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines, or worse, may move to another form of gambling such as offshore-based internet and mobile phone gambling.

Unintended Consequences – Increase in Internet and Mobile Phone Gambling

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



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

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

SIGN UP NOW

Opt in required. Offer valid on first deposit only. Bonus 100% up to a max of \$100. 35x bonus wagering req. in 30 days. 70 free spins awarded on eligible games, 10 per day valid for 7 days.

Game weighting and T&Cs apply

- Lobby New Games Live Casino Top 12 Jackpots Baccarat Slots Table Games More ▾

Slots



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

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

- Has no restrictions on bet sizes;
 - Has no capacity for venue staff to observe and assist people in trouble;
 - Reaches new groups of people who may be vulnerable to the medium;
 - Provides no guaranteed return to players;
 - Is more easily abused by minors;
 - Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and
 - Is unregulated, so on-line gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend that they induce to also open an account and deposit funds.
57. Offshore-based online gambling does not generate any community funding for New Zealanders, does not generate any tax revenue for the New Zealand Government, and does not make any contribution to the New Zealand health and treatment services as no contribution is made to the problem gambling levy.

An Expanded Relocation Provision is Supported

58. Venue relocation is positive. The current relocation provision, however, prevents venues within the Central Area Zone relocating to another site within the Central Area Zone. Council is asked to expand the relocation provision to enable venues within the Central Area Zone to relocate.
59. CBD venues should be permitted to re-establish after a natural disaster or fire. This is reasonable.
60. CBD venues should be permitted to move out of earthquake-prone buildings, dangerous buildings, and insanitary buildings.
61. Allowing CBD venues to relocate will assist with revitalisation of the city. It would allow CBD gaming venues to move to new, modern, refurbished premises. Allowing local businesses to upgrade their premises and provide a more modern, attractive offering to the public helps to revitalise business districts, improves the local economy, and encourages tourism.
62. The first venue to relocate under the amendments made to the Gambling Act 2003 was the Te Rapa Tavern in Hamilton. The photos below show the old rundown premises and the new modern premises. The redevelopment cost \$3,000,000.



The old Te Rapa Tavern



The new Te Rapa Tavern

63. A venue is sometimes required to relocate to adjacent premises due to its fixed lease coming to an end or public works acquisition. When it is clear that the same business exists but has simply relocated a short distance, it is fair and reasonable for the policy to permit the venue to continue its current gaming machine operation.
64. Currently, once a venue has obtained a licence to host gaming machines its value is artificially increased. This often leads to landlords demanding higher than normal rentals. Allowing CBD relocations would prevent CBD landlords demanding unreasonable rentals as it gives the venue operator the ability to relocate to an alternative venue.

Oral Hearing

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

18 September 2020

Mike Knell
Acting Chair
Gaming Machine Association of NZ
Mike.Knell@nzct.org.nz
027 280 2063

Jarrod True
Counsel
Gaming Machine Association of NZ
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027 452 7763

gmanz.org.nz

Netball Wellington Centre

ASB Sports Centre
72 Kemp Street
PO Box 14845
Kilbirnie
Wellington 6022



25 September 2020

Sent via email

Policy.submission@wcc.govt.nz

The Review of the Gambling Venues Policy: Submission form

We thank you for the opportunity to provide feedback on the Gambling Venues Policy – Statement of Proposal.

Netball Wellington Centre is a Not For Profit managed by a board of elected volunteers with a professional background, which was established in June 1930.

We are a membership based organisation, with membership base of over 11,000 aged from 5 through to 85. We have a large membership base from low socio economic backgrounds that struggle financially to be involved in netball. We have a policy that no child should be disadvantaged or miss out due to finances and rely upon contestable funding from gaming trusts, government and local community funding to delivery our services and programmes to the many – rather than just the privileged. The majority of our funding does come from gaming trust to which we re extremely thankful for as is our hapori.

We evaluate how we feel that money from gambling is being used to support our hapori to play sport or do activities that they would not normally be able to go to due to affordability. The funding support is going towards things needed – not niceties. They go to core costs so Not for Profit and/or Charities can survive. We acknowledge there is a negative impact to gambling. The 0.5% of gamblers (we understand there are 44 in Wellington City who have excluded themselves from venues) who do have a problem need help and assistance with their addiction, and we fully endorse the continued 1.3% of Class 4 funding being allocated to support these individuals in addressing their addiction

Celebrating the community benefit of Sport

Sport New Zealand (2018) in their *Value of Sport* report stated “sport and active recreation creates a happier, healthier people, better connected communities and a stronger New Zealand” and that sport is ‘in our DNA’. With going through COVID19 we saw what it was doing to our hapori when they couldn’t play their sport and how excited and energised they were when we did get back into.

We have seen first handed the following benefits:

- Happier and healthier people both physically and mentally. COVID19 has increased mental health issues from stress, depression and anxiety and research has shown that exercise can improve health outcomes mentally and physically.
- Better connected communities as a result of strengthened social and community networks for players and their whanau. We also believe this drives down a lot of the anti social behaviour.
- A stronger New Zealand – financially and through strengthened local, regional and national identity. Netball contributes to the GDP through the employment of people and the hosting of various competitions, tournament and programmes here in the Wellington City.

Netball Wellington Centre

ASB Sports Centre
72 Kemp Street
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Wellington 6022



Option C – our preferred option

After careful consideration our preferred option is C – no change to the current arrangement relating to machines in Wellington.

Our 'Why' for this:

- There is no evidence to justify the change as there has not been a rise in machines or venues. We believe that both the venues and the machines numbers have reduced. Even with reduced venues and machines the level of gambling hasn't altered so clearly reducing venues and machine numbers more won't actually reduce the level of gambling. New Zealand has one of the lowest rates of problem gambling around the world.
- When looking at the sinking lid policy that Wellington City Council want to implement and at other Territorial Local Authorities that have implemented it already, it is our understanding that there has not been a significant decline in the number of problem gamblers. We therefore question the research and the 'why' around the Wellington City Council wanting to impose such a policy here in Wellington and 'what' outcomes they believe they will achieve.
- Class 4 community funding model currently works well. COVID19 has had a devastating effect on Netball because of lockdown impacting funding fluidity and the inability of Class 4 organisations to hold reserves. This has put at risk many netball activities and services provided and the consequent value that these activities create for our netball hapori.
- The Wellington City Council are not providing another viable option for alternative funding sources for entities like us. Fewer machines means less money coming back into the community for the likes of sporting entities, Art and Rec, Schools, Emergency services such as Life Flight, Health organisations such as MS Society and Cancer Society. All of these organisations are providing a service to our Wellington people. Services that are needed. Without Class 4 funding these services would not be available or affordable. Are Wellington City Council ready for the impact and pick up the funding gaps that will be evident with considering this sinking lid policy.
- Many organisations bring money into the Wellington City by hosting events. These events will not proceed without Class 4 funding support. This further reduce income into the Wellington City Council and businesses located in the Wellington City. Businesses will be forced to close, employment opportunities will reduce, and social and sporting opportunities will be only available to the privileged, with an increase in anti social behaviour and mental health issues. This is painting a very gloomy picture for the overall Wellington economy and well being of their hapori.
- Has Wellington City Council budgeted for a downfall in revenue and considered how they will inject money into the community to help keep the city alive and their people safe and healthy? People will leave Wellington as there won't be the employment opportunities and who wants to stay in a City that is DULL to live in with all the social and recreational activities removed and many the emergency and healthy care services no longer available.
- Class 4 funding is well-regulated to provide a financial return to the Wellington communities. We know and understand the harm of gambling but we strongly believe that the harm of

Netball Wellington Centre

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removing this funding will have a far greater negative impact on the many compared to the 44 problem gamblers identified here in the Wellington City.

- We strongly believe that the reduction in the machines and venues here in Wellington won't reduce the number of people gambling with the money going to areas outside of Wellington &/or overseas. We know it is better to have the money coming back into our community and through a well managed and well regulated process and hope that the Wellington City Council and their members can see this too.
- We want to be able to provide active play and netball to everyone and without Class 4 funding sadly this won't be doable. Netball will become a privileged/elite sport and those that need to be engaged in sport and rec won't be and this will lead to much bigger issues for the Wellington City Council to deal with. Have the Council considered also the number of their venues that will remain empty and under utilised. There are already too many assets in the Wellington City/Region that are dormant &/or under utilised and by introducing this sinking lid policy we believe this will add to this growing list.

Summary

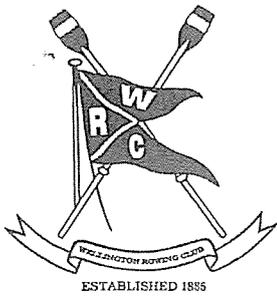
We thank you for the opportunity to submit this feedback on your Statement of Proposal for change to your Gambling Venues Policy.

We strongly support option C for all the reasons mentioned above.

We would like the opportunity to speak to this submission.

A handwritten signature in black ink that reads "Sue Geale".

Sue Geale
General Manager
Netball Wellington Centre



Wellington Rowing Club
Taranaki Street Wharf
PO Box 3273
Wellington 6140

www.wellingtonrowing.org.nz

Gambling Venues Policy
P.O Box 1299
Wellington

21st September 2020

Dear members of the Gambling Policy Unit,

We wish to make a submission to your gambling policy review, we are keen to make an oral submission as well.

Wellington Rowing Club

Rowing has long been associated with Wellington Harbour, going back to professional rowing in the 1870s. The Club was established in 1885, so the Club is now into its 135th year.

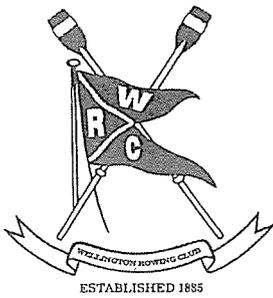
The Club's objective is to be beneficial to the community by fostering and carrying out the sport of rowing in Wellington city, under the affiliation of the New Zealand Rowing Association and Wellington Rowing Association. It is an Incorporated Society, with charitable status.

The Club serves school-age, university, and adult rowers, and provides coaching and facilities to support the most novice of rowers, through to New Zealand representatives. Four of Wellington's secondary schools, as well as Victoria University of Wellington's rowing club, use the Club's plant and facilities. A total of over 250 rowers.

Throughout its long history, it has on occasions struggled for existence, and at other times, has been at the forefront of New Zealand rowing. A recent drain on finances has been the need to strengthen our heritage building as well as requirement to replace roof and paint the exterior, removing lead paint at the same time and remediate structural problems identified during that process. The overall cost of this work is in excess of NZD600k.

We have been and continue to be supported by a variety of organisations as this funding was well beyond the means of our club. A significant amount funding has been via generous grants from organisations involved in gambling including lottery's commission and Lion foundation.

The club has produced its share of champions and New Zealand representatives. In 2019, our Ladies eight won a gold medal at the National Club Championships and we enjoyed an array of other medals at that event. We were also very successful at regional regattas through the season which sadly had been cut short with Maadi Cup, University and Masters regattas all cancelled due to the coronavirus. We are able to attract rowers to our club through provision of good quality modern rowing plant well supported by very good coaches (volunteers) and strong administration (volunteers).



Wellington Rowing Club
Taranaki Street Wharf
PO Box 3273
Wellington 6140

www.wellingtonrowing.org.nz

A significant contributor to the clubs success has been through our ability to provide quality rowing plant, on-land training equipment and safety boats. The subscriptions we charge are kept low as additional costs through the season relating to regattas add a burden to our rowers. We subsidize the operational costs through fund raising and income obtained from letting out our upstairs function room. Unfortunately this income stream has dried up due to Covid.

The Club is reliant on the time and effort invested by many volunteers – from the coaches and committee members, through to parents and supporters who attend and supervise rowing camps and regattas and volunteers who maintain and repair rowing related equipment. We carry out a number of fund-raisings during the season, run a corporate challenge to tap into corporate support, we are however highly dependent on funding from charitable organisation for rowing related equipment and support for our squads to get to national championships which are held either at Lake Karapiro in the North Island of Twizel in the South Island.

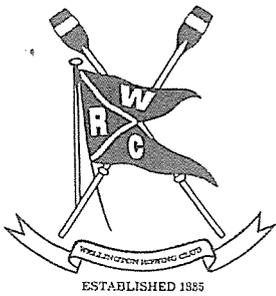
This particular “Covid” year, and for the foreseeable future, due to no university rowing, no corporate challenge possible and many other planned events curtailed, our finances are under considerable strain. While we appreciate we are not alone in this unique circumstance, as a sports club, we will need to rely even more on charitable organization funding support if we are to provide much needed rowing plant to support the increased interest and engagement of young people in the sport of rowing.

Over the last 5 years, 2015-2019, we have applied to the following organisations for funding to be applied to much needed rowing equipment including new boats, indoor rowing machines and safety boats.

Gambling organization	Funds applied for	Funds Received	Success percentage
New Zealand Racing	\$53,324	\$41,752	78
Lion Foundation	\$76,562	\$23,000	30
Infinity Foundation	\$70,034	\$50,700	71
Pub Charity	\$23,500	\$12,000	51
Four Winds	\$28,300	\$12,000	42
NZCT	\$46,100	\$17,600	38

We normally do not seek 100% of our required funding, using our own fund raising efforts to fill gaps. When we do not receive the full amount from a grant application then we struggle to fill the larger gap. Approaches to corporates have not been fruitful apart from the corporate rowing challenge we try and run each year. We do not have a raft of wealthy benefactors although our Alumni and Life Members do provide significant financial support when approached.

With Covid, many more organisations will be seeking the support of charitable trusts and hence we expect our success rate to fall. Already in 2020 we applied for support to a charitable organization to



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support the much needed purchase of a coxless four but were unsuccessful due to limited funding available.

If this Gambling Review was to result in implementation of a sinking lid policy then reducing funding from charitable institutions would materially impact the future success of our club and of rowing as a vibrant sport in Wellington. If a major event were to happen such as an earthquake then under the sinking lid policy then almost overnight funding would dry up. We have seen this impact with Covid.

We earnestly urge the Gambling Venue Policy Review team to not introduce a sinking lid at this time but to continue to allow the current policy to continue. This would allow sporting and community clubs such as ourselves to continue to offer current and prospective members opportunities. COVID has impacted businesses and recreational organisations hard. Recreation and sports are a vital cog in enabling young people to engage in useful healthy activity even though there may be incredibly strong financial pressures.

We ourselves are responding through offering a greatly expanded scholarship programme to assist financially challenged persons wishing to row.

We are interested in making an oral submission.

Kind regards,

A handwritten signature in black ink, appearing to read 'Huw Mitchell'.

Huw Mitchell
President
Wellington Rowing Club



TAWA BOWLING CLUB Inc.

PO Box 51041
Tawa
WELLINGTON 5249

Phone 04 232 5404
Email tawabowlingclub@outlook.com

27 September 2020

Wellington City Council
Gambling Venues Policy-2591001
P O Box 2199
Wellington 6140

Policy.submission@wcc.govt.nz

Review of the Gambling Venue Policy

Thank you for the opportunity to make a submission on the Sinking Lid Policy currently being considered by the Council.

Introduction:

As one of the biggest lawn bowling clubs in the greater Wellington region, we are categorically in favour of Option C-No Change. The Sinking Lid Policy proposal will have serious long-term implications for bowls as a game and for all bowling clubs in our region.

Class 4 gaming continues to be heavily and well regulated with operators abiding by a duty of care to their patrons. Considering the rise in online gambling and the lack of regulations around those activities, it would suggest that problem gambling could actually increase through reducing access to machines.

Class 4 gaming invests money directly into the community

Unlike other gambling activities, Class 4 Gaming invests money directly into the local community. The community funding model currently used to distribute Class 4 gaming money is working well. Fewer machines mean fewer grants and there are no other sources of funding currently that would provide a substitute for the amount of Class 4 funding being accessed by the Wellington community.

Sports organisations like our bowling club has traditionally been reliant on Class 4 gaming as a funding source that is regularly available and accessible in the absence of any other alternative funding option. Without this funding I am sure our club would cease to operate.

Our Bowling Club greens and clubrooms are on reserve land held under a lease from the Council. Our clubrooms are currently hired out as a venue for meetings in support of the community. If we were to close down, this would not only impact financially on the Council but there would be a facility that provides community services, but no users.

Funding also enables our Club to do positive meaningful work beyond simply playing bowls. This includes helping to support the elderly members of the Club in the Tawa community and other close by suburbs, as well as create a safe and inclusive environment. Sport and recreation education is also important in schools and we as a Club provide the pupils of the local Tawa College the opportunity to learn the game of bowls. As well, each year during the month of August the Club runs 'Have a Go Days' with a view to recruiting new members from the community to the game.

Use of Funding

Funding is used by the Club to support core costs incurred to help to continue functioning and to keep the doors open. The common areas include the Greenkeepers salary, affiliation fees, the purchase of equipment and other major operational costs. Over the years gaming funding has also helped our club to cover costs associated with providing a new green, repainting of the clubrooms, updating the interior of the club and maintaining the club surrounds.

Conclusion

The membership of our bowling club is largely retired with limited discretionary income, so the Class 4 funding helps to subsidise our member participation, otherwise the game will become inaccessible except for the wealthy. Consequently, the continued opportunity to apply for and receive funding, becomes more critical to keep our 'head above water' and for the Club to remain in operation.

For the reasons outlined in this submission we support Option C No Change to the current policy, on behalf of the Club and our Tawa community.

The original of this submission has been sent separately by post.

Yours sincerely


Graham Williams

President Tawa Bowling Club





Te Ope Whakaora

Oasis

Reducing Gambling Harm

The Salvation Army Oasis, Wellington

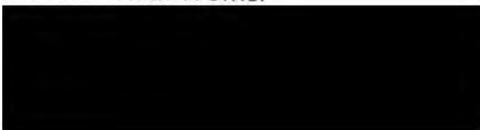
Submission to
Wellington City Council Review 2020

Of the
Gambling Venues Policy and Proposed New Policy

The Salvation Army Oasis, Wellington, welcome the opportunity to make Oral Submissions

Please contact

Vicki Hirini
Public Health Worker



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 (TSA) Oasis was formerly established in June 1997 in response to the growing evidence that the considerable influx of gambling opportunities was having a negative social impact on society. Before 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 preventing and minimising gambling harm services have expanded to seven regions (Auckland, Waikato, Tauranga, Wairarapa, Wellington, Christchurch and Dunedin), with satellite clinics across the country. We are funded by the Ministry of Health to provide preventing and minimizing gambling harm clinical and public health services.

TSA Oasis 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. TSA also has a national addictions leadership team supported by the larger Salvation Army administrative infrastructure.

This submission has been prepared by Wellington Oasis with the approval of the National Addictions Office.

General comments

Gambling Causes Harm in our Communities

As a provider of services to those with addiction issues, TSA Wellington Oasis sees the detrimental effects that harmful gambling has on individuals, 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.

TSA Wellington Oasis believes the siting of most Electronic Gaming Machines (EGMs or pokies) venues in the most vulnerable high deprivation communities is a **social injustice**.

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.

Given the availability of EGMs in central Wellington, workers who come into the CBD are at high risk of gambling harm in the ease of access to EGMS surrounding their working environments. Visitors who come into the CBD are subject to a higher density 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.

The Gambling Act 2003 stipulates that gambling cannot be the primary business of the premises and 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.

Wellington City has a range of educational institutions attracting large numbers of students to the city. 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.

Gambling in Wellington

In the last twelve months the people of Wellington City have lost **\$34,309,766.90** on pokies despite the closure of venues during Covid 19 this year.

There are **633 EGMs** and **40 venues** in Wellington City Council's area.

The Salvation Army Oasis supports a Sinking Lid Policy

Williams and Simpson⁴ propose several 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. On 21 August 2019 Porirua City also added a sinking lid to their gambling policy.

Feedback on proposed policy

Overall, The Salvation Army Wellington Oasis **supports** the proposed gambling venues policy 2020. We encourage the Council to be proactive in reducing gambling harm by adopting the Sinking Lid Policy for Wellington 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 across all areas of the city.

We recognise and applaud Wellington City Council for supporting this as their preferred option for their Gambling policy review. Thank you.

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

Four Winds

FOUNDATION

Submission on Wellington City Council Gambling Venue Policy

Introduction

Four Winds Foundation Limited is a Class 4 gaming society with the following venues in the Wellington City Council area:

- Brooklyn Bar, Brooklyn
- Corner Bar, Kilbirnie
- One Fat Bird, Karori
- The Mermaid, Wellington Central

Summary

1. Four Winds supports the status quo (Option C) and opposes any proposed 'sinking lid policy'.
2. Four Winds requests that the current relocation policy be expanded to enable venues currently located with the 'Central Area Zone' to relocate within this zone.
3. Four Winds wishes to speak to our submission 

Gaming machine funding

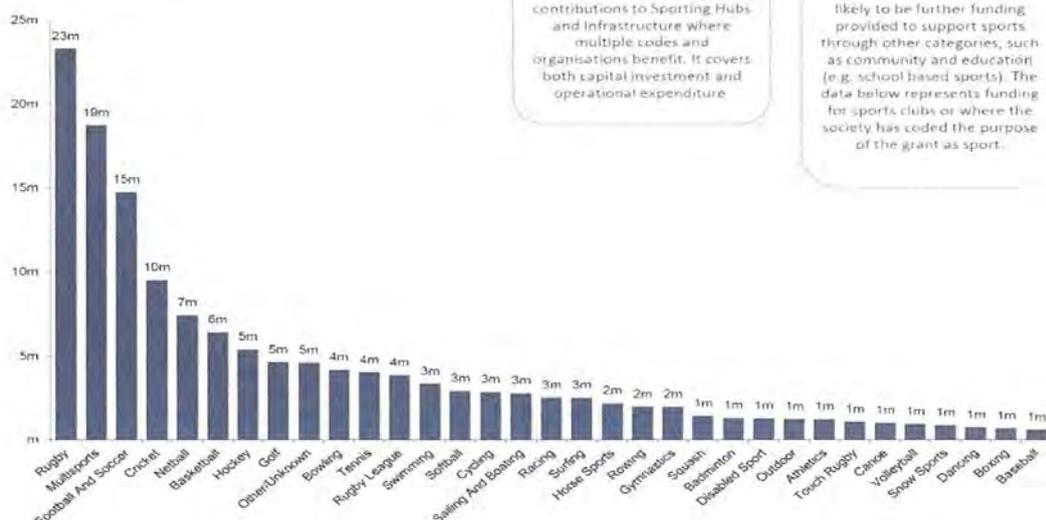
The Gambling Act 2003 seeks to balance the potential harm from gambling against the benefits of using gaming machines as a mechanism for community fundraising.

In 2018 \$276 million of grant funding was approved across 28,074 recipients to 10,853 separate organisations.

54% of grants distributed in 2018 were sport related with community related recipients receiving 20% - this funding is critical (and has never been more so with 2020 events)



Amount granted by Sport



2017/2018 \$61m was granted to community organisations within the Wellington region

2019 – Four Winds sample grants from Wellington venues

Included:

\$100,000	Basin reserve Trust
\$19,785	Creative Capital Arts Trust
\$20,000	Kaibosh
\$154,000	Sport Wellington
\$10,000	Evans Bay Intermediate
\$35,000	Wellington Free Ambulance

Benefits

Gambling is a **popular form of entertainment that most New Zealanders participate in** with the 2018 Health and Lifestyles Survey finding that 67.2% of adult New Zealanders had participated in some form of gambling in the previous 12 months (*estimated to be 2,650,000 adults*).

In the 2019 calendar year, **Wellington-based non-casino gambling contributed \$15.06 million to the government by way of taxes, duty and levies.**

In the 2019 calendar year, the **gaming machine industry paid approximately \$6.51 million to Wellington-based hospitality businesses, thus supporting local employment and business growth.**

Revenue Breakdown

'Return to players' on a non-casino gaming machine are required to be set between 78% and 92%, with most being set at 91.5%.

On average for every \$1.00 gambled, 91.5 cents is returned to the player in winnings.

The money retained is typically allocated as follows:
Typical Distribution of Gaming Machine Profits

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	0.78%	0.90%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.83%	43.5%

Key facts

1. Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, 32 years ago.
2. **Gaming machine numbers are in natural decline.** In **2003**, New Zealand had **25,221 gaming machines**. In **June 2020**, New Zealand had **14,847 gaming machines**.
3. In **2004**, **Wellington city** had **75 venues**. In **2020**, **Wellington city** has only **40 venues**.
4. New Zealand has a **very low problem gambling rate by international standards**. The New Zealand National Gambling Study: Wave 4 (2015) found the **problem gambling rate was 0.2% of people aged 18 years and over**. The problem gambling rate is for all forms of gambling, not just gaming machine gambling. (**Equates to 20 persons per 10,000**)
5. The **Ministry of Health records the number of people who seek help for problem gambling from each territorial authority**. This includes the people who use the helpline, text service, or obtain face-to-face counselling. Compared with other cities of similar size, **Wellington City has an extremely low problem gambling rate**. In the year July 2017 to June 2018 (the most recent data available) **63 new persons from Wellington City sought help for problem gambling**. **Wellington has a population of 214,537 people**. In contrast, in the same period, 103 new people from Hamilton City sought help for problem gambling. Hamilton has a population of 209,406.
6. **All gaming machine societies contribute to a problem gambling fund**. This fund provides **approximately \$20 million per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness**. The funding is ring-fenced and not able to be redirected to other health areas.
7. An excellent, well-funded problem gambling treatment service exists. The **problem gambling helpline is available 24 hours a day, 365 days per year**. **Free, confidential help is available in 40 different languages**. **Free face-to-face counselling is also available and specialist counselling is available for Māori, Pasifika and Asian clients**. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

Existing Safeguards

- Strict limitations exist on the type of venues that can host gaming machines. The primary activity of all gaming **venues must be focused on persons over 18 years of age**. It is **prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas**.
- There is a statutory age limit that **prohibits persons under 18 years of age playing a gaming machine**.
- **All gaming machines in New Zealand have a feature that interrupts play and displays a pop-up message**. The pop-up message informs the player of the duration of the player's session, the amount spent and the amount won or lost. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.
- Gaming machines in New Zealand **do not accept banknotes above \$20.00 in denomination**.
- **All gaming venues have a harm minimisation policy**.
- All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
- All gaming **venues have signage that encourages players to gamble only at levels they can afford**. The signage also details how to seek assistance for problem gambling.
- All gaming **venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training**.
- Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
- It is not permissible for a player to play two gaming machines at once.
- All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
- The **design of a gaming machine is highly regulated and controlled**. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).
- It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

Costs of the system

The Problem Gambling Foundation have recently suggested that 60% of the revenue generated from gaming machines is the costs of running the system (with the remaining 40% being the returns to the community).

In fact, **the community benefit is much more like 80%**, with the approximately 40% share that makes up the various taxes, duties and GST in effect also being a community contribution, going into the public purse to contribute to public good.

The actual '**running of the system**' is **only about 20%** with this 20% representing money to businesses – local hospitality businesses, trusts, equipment providers and technicians – and a significant number of jobs in our cities, towns and communities.

Current Policy

The current policy is reasonable, given the **current environment of high regulation and naturally declining machine numbers.**

There is **no direct correlation between gaming machine numbers and problem gambling rates.** Over the last ten years, the problem gambling rate has remained constant despite gaming machine numbers declining rapidly (*4,618 gaming machines have been removed from the market*).

A **more restrictive policy** is unlikely to reduce problem gambling, but **will, over time, reduce the amount of funding available to community groups in Wellington City.** Reducing gaming machine venues reducing casual and recreational play, and therefore the amount of money for grant distribution.

Problem gamblers are persons who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines, or worse, may move to another form of gambling such as offshore- based internet and mobile phone gambling where identifying and treating their addiction is not possible.

Unintended consequences

Any **reduction in local offering may have unintended consequences, as this could lead to a migration of the gambling spend to offshore internet- and mobile-based offerings**. While it's illegal to advertise overseas gambling in New Zealand, it's not illegal to participate in gambling on overseas-based websites or mobile phone apps

A simple search and a few minutes to download to a computer, tablet or mobile phone any type of casino game you desire, including an exact replica of the gaming machine programs currently available in New Zealand venues. New Zealanders love gambling online with the Lotteries Commission reporting in its 2017/18 Annual Report that online sales accounted for 16 per cent of its total sales (\$201.1m), compared with 13 per cent the previous year.

The New Zealand Racing Board noted in its latest six-monthly report that **online channels made up 59.2 per cent of its betting turnover, up 2.2 percentage points on last year with its online platforms were the fastest-growing channels**. SkyCity has launched an offshore-based online casino with a large selection of gaming machine games.

A September 2018 Cabinet paper⁷ on online gambling suggests that New Zealanders gambled approximately \$300 million with offshore providers in 2017, with the **online market growing annually at between 12 and 20 per cent**.

The Cabinet paper notes "It [online gambling] has the potential to drive changes in behaviour to a greater, and more harmful, extent than some land-based gambling."

Offshore-based online gambling poses considerable risks because it:

- Is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
- Has no restrictions on bet sizes;
- Has no capacity for venue staff to observe and assist people in trouble;
- Reaches new groups of people who may be vulnerable to the medium;
- Provides no guaranteed return to players;
- Is more easily abused by minors;
- Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and
- Is unregulated, so on-line gamblers are often encouraged to gamble more by being offered inducements by being offered the opportunity to gamble on credit. For ex: many overseas sites offer sizable cash bonuses to a customer's account for each friend they induce to open an account & deposit funds

Offshore-based online gambling does not generate community funding for Kiwis or tax revenue for the New Zealand Government.

Does not make any contribution to New Zealand health or treatment services as no contribution is made to the problem gambling levy.

Increased relocation provision is supported

Four Winds strongly supports as **venue relocation has many community positives**. The current relocation provision prevents venues within the Central Area Zone relocating to another site within the Central Area Zone. Council is asked to expand the relocation provision to enable venues within the Central Area Zone to relocate.

CBD venues should be permitted to re-establish after a natural disaster or fire with CBD venues also permitted to move out of earthquake-prone buildings, dangerous buildings, and insanitary buildings as this is only fair and reasonable.

Allowing CBD venues to relocate **assists revitalisation of the city**. It would allow CBD gaming venues to move to new, modern, refurbished premises. Allowing local businesses to upgrade their premises and provide a more modern, attractive offering to the public helping to **revitalise business districts, improve local economy, and encourage tourism**.

Hearing

Four Winds wishes to speak to our submission



Thank you for the opportunity to submit.

Randal Godfrey
General Manager, Four Winds Foundation



To: Jim Lewis
From: Susan Elliot
Date: 30 September 2020
RE: Submission Ban and Phasing Out of Pokie Gambling Machines

I was appalled to learn that the Wellington City Council is not fully supporting a ban on new pokie gambling machines with the goal of having them eliminated from our community over the next two years.

Evidence¹ clearly shows gambling has a deleterious effect on children and families, and this damage disproportionately affects low-income children and families.

I believe It is a predatory business model that ultimately sees far more pokie machines situated in the communities that can least afford to sustain them. The financial gain from pokies and gambling must not outweigh the cost of gambling to our poorest communities and whanau. This industry is creating a vicious cycle necessitating an 'ambulance at the bottom of the cliff' approach; an approach we can ill-afford when we could be more easily be addressing the causes.

As a New Zealander and a member of Child Poverty Action Group, I believe a scenario where children too often suffer from illness, hunger, inadequate housing, and sometimes abuse, as a result of their parents' crippling addiction to gambling cannot be allowed to continue. In particular, it is untenable that a Council so invested in community care and support can condone this practice. It is time to minimise the impact of problem gambling on the lives of our children.

Please act now to support a ban on new pokie gambling machines with the goal of having them eliminated from our community over the next two years.

This submission fully supports the Problem Gambling Foundation submission.

I would be happy to speak to this submission.

Respectfully submitted,



Susan Elliot

Wellington

¹ Auckland University of Technology. 2017. Problem Gambling and Family Violence in Help-Seeking Populations: Co-Occurrence, Impact and Coping. Wellington: Ministry of Health)



28/9/2020

Gail Duncan [REDACTED] for

Social Justice Group

St Peter's Church

The Anglican Parish of Te Aro

211 Willis Street

Te Aro

Wellington

To Jim Lewis
Intermediate Policy Adviser
jim.lewis@wcc.govt.nz
Wellington City Council

Submission on WCC Gambling Venues Policy

In relation to this matter we have considered the report from the New Zealand Institute of Economic Research commissioned by the Salvation Army and the Problem Gambling Foundation.

The figures relating to class four or non-casino electric gambling machines NZ wide are concerning and we are deeply concerned particularly in terms of their social cost and the drain on the wider economy.

We note there are 633 of these machines and 40 venues in the Wellington City Council jurisdiction and some \$40.7m is lost by gamblers playing these machines in Wellington, a huge sum. Over \$30m is retained by pubs, clubs and TABs but only \$9.4m paid out to community organisations and sporting bodies. This ratio of social contribution, only around 25%, is paltry given the only cost to the organisation housing these machines is floor space and machine rental which should be minimal but is probably not.

With 633 machines and 40 venues in the Wellington area there is easy access to this activity. The addictive effect of pokie machine gambling is well documented, with the major impact falling on poorer communities and on areas where Maori and Pasifika live. Access is too easy.



The funds removed from base economic activity have a negative effect on the local community economy. The amount lost to pokie machine on Wellington's venues amounts to \$82,000 daily. This is direct baseline economic activity that is not happening because the necessary funds for that activity are drained away from those who can least afford it (and that includes the community merchants in the areas where the machines are concentrated). The combination of pokie machines in venues licenced to sell alcohol is problematic as those who are drinking and using the machines would be expected to gamble more compulsively while under the influence of alcohol.

We do not consider that the social contribution from funding organisations through charitable donations comes close to offsetting the social harm done by the consequences of addicted and compulsive gambling on these machines.

The community groups and sports organisations that rely on applications for pokie grants have no assurance of continuing support or transparency as to the mechanisms for distribution.

There are many charitable associations making grants which are not drawn from gambling losses. We recommend more publicity about these.

For these reasons we support these proposals:

- a sinking lid on the number of pokie machines in the Wellington area.
- no transfer of machines to a new pub or owner if the venue closes.
- reinstatement of the clause that would prevent non-designated premises from becoming venues with pokie machines.

Gail Duncan on behalf of Social Justice Group
28 September 2020

Wellington City Council
 Gambling Venues Policy
 PO Box 2199
 WELLINGTON 6140



1st October 2020

RE: WELLINGTON CITY COUNCIL GAMBLING VENUES POLICY – STATEMENT OF PROPOSAL – CAPITAL FOOTBALL SUBMISSION

To whom it may concern,

INTRODUCTION

Thank you for the opportunity to provide feedback on the *Gambling Venues Policy – Statement of Proposal*. This submission is made by the Capital Football Federation (and co-signing clubs) and outlines our views and that of the football community on the proposed changes to the Wellington City Council (WCC) Gambling Venues Policy.

Our position is to propose *Option C: No change to the current arrangements relating to machines and venues in Wellington*.

Class 4 Gaming is already well regulated to provide a financial return to community sport for the benefit of players. Attempts to reduce or remove this opportunity will have undesirable consequences over time.

The WCC proposal of a sinking lid policy suggests that it will address the harm done by Class 4 Gaming. The proposal does not give sufficient thought to the damage that may be created as a consequence of the withdrawal on community sport that is currently funded through Class 4 Gaming returns. **It is Capital Footballs understanding that *sinking lids* are founded on error. Less machines resulting in less harm is flawed by facts provided by the Ministry of Health over the past 15 years.** Further, we are currently operating in an unprecedented era due to COVID-19 and are yet to see the full impacts of this which brings into question the timing of the WCC proposal. In participation terms this proposed policy will directly affect 22,163 football players in the Wellington region.

THE VALUE OF CAPITAL FOOTBALL AND SPORT

Capital Football's mission is to provide, develop and safeguard the future of football in the wider Wellington region. With 42 clubs and 22,163 players we are the largest regional sporting organisation in the wider Wellington region in terms of player base.

The graph below breaks down playing numbers by age group and gender. In 2019 Capital Football had 6,782 junior, 5,331 youth, 3,550 senior, and 6500 futsal players. 8,996 of these players are from the WCC region (excluding futsal) and are represented across 14 of our 42 clubs:

Brooklyn Northern United
 Brooklyn Northern Juniors
 Island Bay United AFC
 Marist AFC
 Tawa AFC

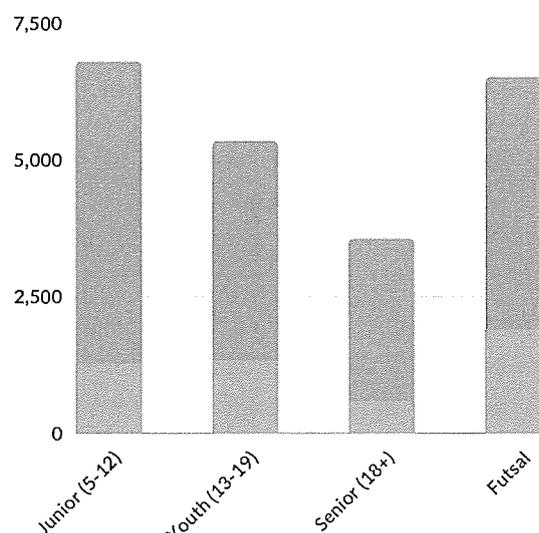
North Wellington
 North Wellington Juniors
 Wellington Olympic AFC
 Onslow Junior FC
 Miramar Rangers AFC

Seatoun AFC
 Victoria University
 Waterside Karori AFC
 Wellington United AFC

Capital Football and Clubs access funding for projects or programmes to support core costs incurred within football and in many cases to keep the doors open. The common categories across which funding can be classified are salaries, ground charges, sports equipment, maintenance, events, tournaments, coaching, etc.

CAPITAL FOOTBALL
 PLAYING NUMBERS
 2019

22,163
 PLAYERS



*NUMBERS BASED OFF 2019 REGISTRATIONS

A recent Sport NZ study¹ exploring the value of sport to New Zealanders, their communities and our country found that participation in sport leads to:

Happier, healthier people (both physically and mentally):

- *being physically active is a key determinant of wellbeing*
- *sport and physical activity can reduce rates of a range of mental health conditions such as depression and anxiety*
- *Sport and physical activity can reduce rates of many physical health related disorders and improve health outcomes as a result*

Better connected communities as a result of strengthened social and community networks:

- *A sense of belonging is important to New Zealanders' feelings of wellbeing*
- *Evidence suggests that participation in sport and physical activity can help to develop feelings of belonging and inclusion particularly for new migrant populations*
- *Sport and recreation programming can reduce the incidence of antisocial behaviour.*

A stronger New Zealand – financially and through strengthened regional and national identity:

- *The sport and recreation sector's contribution to GDP is significant and growing*
- *The number of people employed in the sector is large and growing*
- *hosting major sporting events improves host city feelings of pride.*

¹ Sport NZ (2017). Value of Sport and Active Recreation to New Zealanders. Accessed from: <https://sportnz.org.nz/media/1313/angus-associates-value-of-sport-final.pdf>

Capital Football and our Clubs play a support role in providing opportunities for players, coaches, referees, volunteers, supporters, and administrators to be involved in community sport. Class 4 Gaming plays a pivotal role in providing funding for these opportunities.

WELLINGTON CITY COUNCIL – SECONDHAND RECIPIENTS

Within the WCC *Gambling Venues Policy – Statement of Proposal* there is no reference to the potential financial consequences for the WCC should a sinking lid policy be applied. There are 14 football clubs within the WCC region who annually apply and access Class 4 Gaming to cover the costs of ground charges set by the Council. There are two obvious issues here:

1. The WCC will potentially be removing access to Class 4 Gaming funds that go directly back to them for the payment of use of their grounds.
2. In the current environment of COVID-19 people do not need any added financial pressure, and with the full effects of COVID-19 yet to be displayed it is irresponsible of the WCC to suggest otherwise

Below is a breakdown (based on 2019 data) of the WCC ground charges to Capital Football for the use of their grounds to run football competitions. This cost is built into affiliation fees and subsequently passed on to clubs as part of the cost to play in Capital Football competitions. Clubs apply for and access Class 4 Gaming to support the costs of such fees.

CAPITAL FOOTBALL WCC CHARGES - PASSED TO CLUBS	2019
Artificial turf	\$ 133,000
Grass pitches	\$ 50,000
Total	\$ 183,000
CLUBS % (ESTIMATE) FUNDED BY CLASS 4 GAMING	
Wellington based clubs - 90%	\$ 134,000
Other clubs in greater Wellington (TA's) - 25%	\$ 34,000
Total	\$ 168,000
% OF ADDITIONAL TRAINING CHARGES (DIRECTLY TO CLUBS)	
Wellington based clubs - 90%	\$ 90,000
TOTAL PAYMENT TO WCC FUNDED BY CLASS 4 GAMING	\$ 258,000 (per year)

Capital Football estimate that \$168,000 of the total WCC ground charges are successfully applied for and accessed through Class 4 Gaming. On top of this, clubs personally book their own training times through WCC for a further \$100,000 of which we estimate that at least 90% would be funded by Class 4 Gaming. This brings the total payment (per year) to the WCC to **\$258,000**. This number is for football only, if the WCC were to factor in other codes it would be well in excess of **\$500,000** per year.

If the WCC proposal of a sinking lid policy were to come into effect, the above \$258,000 would ultimately fall back on players, and families. Over time the percentage of this will only increase.

The WCC *Gambling Venues Policy – Statement of Proposal* fails to address this which will not only have a significant impact on football but potentially on the WCC. Again, the WCC fails to address that any decrease in accessible funding would simply be passed back to participants (i.e. through club subscriptions).

TIMING AND LACK OF VIABLE ALTERNATIVE FUNDING SOURCES

The community funding model currently used to distribute Class 4 Gaming is working well. As stated above helps support Capital Football's 22,163 players and 42 clubs to have the opportunity to play and be involved in football on an annual basis. Due to the current environment sport faces there is a real feeling of uncertainty directly related to COVID-19 and the availability of alternative funding sources.

COVID-19 has had a devastating effect on many sectors including sport because of lockdown impacting the flow of secure income from gambling machines and the inability of Class 4 organisations to hold reserves. This has put at risk many regional sport organisations who deliver sporting value to their communities. We are yet to see the full impacts of COVID-19, and it suggested that it will not be until 2021/2022 where we will see the true effects on sport. Some examples to date of this impact are:

- Capital Football reduced staff hours to 80% of FTE (for an eight-week period) due to the financial risk of losing \$40,000 every week the season was not played;
- Auckland Football Federation cancelling their season after only eight rounds of competition
- New Zealand Rugby Union laying off 25% of their staff;
- Large government pay-outs to New Zealand Netball, The Warriors, Super Rugby Clubs, and the Phoenix.

Now is not the time to put further pressure on community sport.

Fewer machines mean fewer grants:

- In the last 12 months funding generated across the wider region from Class 4 Gaming was \$61 million of which \$16.9 million was returned to community sport in Wellington city.
- There are no other sources of funding currently that would provide a substitute for the amount of Class 4 funding being accessed by the community.

Many sport organisations have traditionally been reliant on Class 4 Gaming, and while this makes these organisations vulnerable this is their reality where they are using a funding source that is regularly available and accessible in the absence of other viable options. There are organisations in our region which would become insolvent almost immediately without this funding as seen by many of the options taken by those regional sports bodies to avoid such during and following lockdown in early 2020.

Further, in 2012, the Auckland City Council commissioned a community funding survey². The study confirmed how essential gaming machine funding is to a very large number of community sport organisations and how extremely difficult it would be for such funding to be obtained from alternative sources. The key findings of the survey were:

- Most respondents (75%) indicated that their organisation is moderately or totally reliant on gaming machine funding to fund core business activities.
- Most respondents (55%) believed that there would be a high to extreme risk to their organisation and their core business if they did not receive gaming funding. A further one-quarter (26%) said that there would be a moderate risk if they did not receive it.
- Two-thirds of respondents (68%) said that they thought that they would be unlikely to find another source of funding if gaming funding was not available.

² Auckland City Council (2012). Community Funding: A Focus on Gaming Grants. Accessed from: <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/docsresearchongambling/community-funding-focus-gaming-grants.pdf>

The study concluded: Gaming Trust funding is a major source of community sport funding for organisations in the Auckland Region.

Organisations are working hard to diversify their income. However, such income is extremely difficult to access, fundraising activity does not generate a high return, and there is unlikely to be any Government funding set aside to cover the activities that are currently funded by Class 4. As we move as a country into a recession, this will make accessing funding from alternative sources even more difficult

NO EVIDENCE TO JUSTIFY CHANGE

It is Capital Football's opinion that there is no evidence to justify a change from the status quo. From what we understand, there has been no significant rise in the number of machines and/or venues. We understand that since 2004, venue numbers have reduced, and that gaming machine numbers have also reduced by 25% over the past 10 years. The level of gambling and the problem gambling rate has remained at the same level over that time.

New Zealand has one of the lowest problem gambling rates in the world. According to the Gaming Machine Statistics and Research Paper 2020³ the problem gambling rate is 0.2% of people aged 18 years and over in New Zealand. The problem gambling rate is for all forms of gambling, not gaming machine gambling alone.

We acknowledge there is a social cost to gambling when this becomes a problem for an individual impacting family and friends. However, for the sake of balance, the vast social value created by the funding generated from gambling must also be properly acknowledged. Children, in particular, are the beneficiaries of the application of these funds.

OUR POSITION – OPTION 'C'

As clearly outlined our position is to propose *Option C: No change to the current arrangements relating to machines and venues in Wellington.*

Taking gaming machines out of communities will not reduce problem gambling. As we saw through COVID-19 lockdown, people who want to gamble will find other ways to do so. While the extent of online gambling by New Zealanders has yet to be fully researched, it is obvious from overseas research and anecdotal evidence that online gambling is growing very quickly. Online gambling options are more harmful as a consequence of being unsupervised, less regulated, incentivised to encourage more gambling, and using virtual money rather than cash. And, there is no return to the community.

SUMMARY

The problems of the few should not outweigh the benefit to the many. Our position has clearly been outlined in this submission; to summarise below:

1. **The value of Capital Football and Sport** – 42 clubs and 22,163 players benefit from Class 4 Gaming funding in the Wellington region. If this is slowly taken away this loss in funding will directly affect participation and put unneeded pressure on organisations and individuals.

³ J True & M Cheer (2020). Gaming Machine Gambling Statistics and Research Paper – Information for Territorial Authorities. Accessed from: <http://www.gamblinglaw.co.nz/download/TAlInfo.pdf>

2. **WCC second-hand recipients** – Capital Football and our Clubs alone pay approx. \$258,000 to the WCC annually for ground charges. This policy fails to address this which will not only have a significant impact on football and its players but directly on the WCC.
3. **The timing of the proposed changes and lack of viable alternative funding sources** – due to the current environment sport faces there is a real feeling of uncertainty directly related to COVID-19 and alternative funding sources. The removal of Class 4 Gaming will only amplify this.
4. **No evidence to justify change** – New Zealand has one of the lowest problem gambling rates in the world of 0.2%. History has illustrated that the removal of machines (25% in 10 years) has no correlation to the decrease in gambling rates.

CONCLUSION

We thank you again for the opportunity to provide feedback on your *Statement of Proposal* for change to your Gambling Venues Policy. For the reasons outlined in this submission we support *Option C: No change to current policy*.

The contact person for this submission at Capital Football is Todd Bryant (todd@capitalfootball.org.nz; 021746104).

We wish to appear before Council to speak to our submission.

Please note that this submission is on our website (<http://www.capitalfootball.org.nz>) and has been shared with our members.

Kind regards,



Todd Bryant

Business Development Manager

Capital Football (for and on behalf of the below clubs)

- | | | |
|------------------------------------|-------------------------------------|------------------------------------|
| 1. Brooklyn Northern United | 2. Brooklyn Northern Juniors | 3. Island Bay United AFC |
| 4. Tawa AFC | 5. North Wellington | 6. North Wellington Juniors |
| 7. Wellington Olympic AFC | 8. Waterside Karori AFC | 9. Wellington United AFC |
| 10. Miramar Rangers AFC | 11. Seatoun | 12. Victoria University |
| 13. Western Suburbs | 14. Petone FC | 15. Stop Out Sports Club |
| 16. Stokes Valley FC | | |

Submission to WCC re Gambling Venues Policy Consultation

Nadine Coulter

[REDACTED]
Hataitai
Wellington 6021

I am making this submission as an Individual.

I WOULD LIKE TO MAKE AN ORAL SUBMISSION TO THE COUNCILLORS – YES PLEASE

Phone number [REDACTED]

I work part time and then have volunteered a significant amount of time over the past seven years for:

- Wellington United Junior Football Club;
- Wellington East Girls College;
- Rongotai College.

Why do I volunteer? Primarily to make sure that boys and girls have access to sport (and sporting equipment) - in particular those families from low socio-economic families and refugee families.

My preferred option is **Option C – No change to the existing policy**

The basis for supporting Option C includes:

The HUGE financial, social and wellbeing grant funding has had on hundreds of young people. I would like to start by giving some tangible examples of the difference grants have made:

- In previous years, the **Wellington East Girls College Softball team** had been champions but in 2019 it was decided they could not travel to Christchurch to compete for financial reasons. They girls were upset and the families felt powerless – at almost \$1,000 per girl (and some families had two talented girls in the team) they decided as a team not to go. I secured grant funding to pay for their accommodation, most of their flights, van hire and so they got to go. We also applied for funding for a brand new strip (the first time the school ever had one) and they wore it with pride. They won the competition and some of the girls were subsequently selected to be in the New Zealand team. The families wrote to us about how grateful they were for this funding.
- **Rongotai college** has just recently been awarded \$11k towards **Waka Ama paddles and life vests**. Up to now, they had none of this gear and had to rely on the generosity of Wellington College to “borrow” their gear in order to go to tournaments. This meant a limit in numbers for an activity that for many boys has significant cultural significance. This year, we can send at least four teams. The boys are ecstatic and more boys will be signing up.
-
- **School Camp for Rongotai College financial support** for students who otherwise could not go which gives the chance to enhance the boys hauora and wellbeing away from academic goals and is summed up by their Dean. *“Camp is a chance to remind them that school is not just about what happens in the classroom. Allowing the boys to celebrate the end of their*

junior school journey before they embark upon the rigours of NCEA is a big part of why we changed to a Y10 Camp. I feel that this is a perfect way to let the boys come together and just be kids for one last time before the start of Y11 and the hunt for credits begins”.

- **Circus Training for a Wellington East Girls College, Te Aka Supported Learning class.** The skills gained included physical development, social communication skills, ability to take positive risks, confidence to perform, and gaining trust in each other. One student had a goal for the year of being able to move her arm in a full circle. By the end of the circus sessions she had developed her arm strength and movement so much that she performed on the high trapeze for our Circus Showcase. This was a huge achievement. The cost of these types of programmes are always prohibitively expensive given the high ratio of instructor support required per student. The girl’s families predominantly come from lower socio economic backgrounds where there is no spare money to spend on these types of programmes. Day to day life can be a struggle for these families. No such programme was run in 2019 because of this reason. To complicate matters, the girl’s families cannot fundraise easily with the girls and cannot leave the girls home alone to go out and fundraise. Due to Covid, the circus training is a highlight for these families in 2020.
- **General Sports Equipment.** Neither school can afford the gear that is needed each year to support winter and summer sports codes. We estimate fees would double/if not triple without the aid of grant funding and no capital sports equipment would ever get purchased.
Examples of general replacement gear funded: netballs, netball bibs, cricket balls, footballs, futsal balls, hockey goal keepers equipment, hockey balls, floorball sticks, floorballs, team uniforms, training bibs, volleyball nets, basketballs, gym mats and equipment, water polo balls, kapa haka uniforms, athletic shoes, handball goals, table tennis tables, ground hire, pool hire, ASB hire and we have many more items needed.
Examples of capital equipment funded: Basketball shooting machine, cricket nets, cricket bowling machine, football goals, cricket nets, gym gear (treadmill, rowing machines, spin bikes), covered trailer, waka ama paddles, life vests, dragon boat paddles, futsal goals, floorball rink, music choir risers and netball poles. Both schools have many more capital items required and everything is expensive.
Support for tournaments for: Basketball, Football, Waka Ama, Athletics, Hockey, Rowing, Underwater Hockey.

Why Accessing Sponsorship is difficult, if not impossible

Sponsorship will NOT replace grant funding. I have found in the last ten years I have been involved in volunteer positions that corporate sponsorship makes up about 2% of any funds received. Most bigger Wellington companies (ie car dealerships, investment companies) are usually aligned with either their target markets or where they went or where their children currently go to school which are usually high decile or private schools. The schools I volunteer do not fall into either of these two categories. It took Wellington East six months to gain \$7,000 of sponsorship money compared to \$60,000 of grant funding being sourced in the same period. Rongotai College has not gained any corporate sponsorship and is unlikely to being a decile 6 school.

Grant Funding supports local businesses

Local businesses are supported by grant funding. All grant organisations require grant funding to be used to purchase goods from a NZ Supplier. I have sourced over \$300,000 over the past seven years, a lot of which has gone to local Wellington Businesses (Kilbirnie Sports, Circus trainers, Billabong Trailers, Van hire companies) or to WCC for ground/pool/ASB court hire. If the grant machines go, this will no longer happen.

Grant Funding helps lower socio economic and refugee families

Grant funding goes towards summer and winter tournament trips, camps, uniforms, ground hire which frees up money that can help families who struggle to pay their tournament or sports fees. Covid has meant an extra burden for some families and so far the schools have just let the girls and boys continue to play despite not paying fees. This is not sustainable in 2021 or beyond.

Grant Funding allows kids to play more than one sport

The grant funding means for some families, their talented children can play more than one sport. With academy fees, uniforms, shoe costs, families with more children have restricted their children to one sport. Research shows that children should be allowed to pursue multiple sports before selecting a specialised sport in their late teens. Without grant funding, some young girls and boys will not find their preferred sport or drop out altogether losing the enjoyment and mental and health aspects of sport and even the opportunity to become a "New Zealand" representative.

Grant Funding has a positive outcome on a young persons' mental wellbeing

The value sport plays at schools, indeed for young adults in general cannot be understated. In addition to the well-publicised physical and mental health benefits, young adults involved in sport are shown to be more engaged in learning, achieve better academically, have greater self-esteem, and have fewer behavioural issues in the classroom. Furthermore, sport encourages collaboration and teamwork.

For some young adults' sport is their life and some of the bigger items of equipment (basketball shooting machine, floorball rink) will help on their way to becoming NZ representatives or gain university scholarships. This equipment usually is around \$12-\$20k each and without grant funding, it will never be sourced by the school. This is proven by the fact, Rongotai College has waited 15 years for the basketball shooting machine and Wellington East Girls College, 20 years to outfit the sports gym. As discussed above, corporate sponsorship will not fill this gap and over the years both Colleges will again have spaces with broken outdated gear.

Removing gaming machines from Wellington will not stop gambling

I do not believe people will stop gambling if you remove the machines. They will just gamble overseas and NO money will then be returned to the Wellington Region – to the schools who will get huge benefits for their girls and boys, to the NZ suppliers where the money is spent (a huge part being Wellington suppliers), and there will be no funding available to help the problem gamblers (currently funded by the gaming machines). Who will then help the problem gamblers (I do not think WCC will be able to afford to replacement that funding, let alone replace the gap in grant funding)?

School Sports fees will have no option but to be increased.

College Sport Wellington who also receives grant funding to subsidise ground fees (largely paid to WCC) will need to on charge these costs. I have estimated that each sport may easily increase by at least \$200. If you are a family with three children, each wanting to play two sports, the sports fees may cost at least \$1,800 per year plus winter/summer tournament fees which may mean a family with three children playing two sports may need to find up to \$5,000 plus EXTRA each year. If they have been affected by Covid, how will they find this money? I have heard so many stories of Mums and Dads having to say no and how heart breaking this is. That is why I started volunteering in the first place.

In conclusion, yes I agree that gambling is not always ideal for a small proportion of the gambling community but the benefits from the gaming funding is HUGE. The effects on hundreds of families – parents who will struggle to play, girls and boys who gain so many things from sport. The lockdown and Covid showed us how important sport is to a young person's life. PLEASE DON'T make it harder than it already is to have sports gear and sports opportunities. The schools I volunteer for still have a long way to go in many sporting codes to have proper gear compared to other higher decile or private schools. Please keep the status quo so that not only does the community have proper funding, the grants organisations can continue to help fund support for problem gamblers.

Wellington East Girls College Softball Champions 2019

Extract from their Coach (a father) on behalf on the team:

"We left as a School Team, played as a Softball Team and came home as a Family. This wouldn't have been possible without the support of One Foundation and Infinity Foundation for their funding. With your support we were able to go out there and play the game we love and bring home the title".





Wellington City Council Submission

OLÉ FOOTBALL ACADEMY |
OCTOBER 2020



About Us

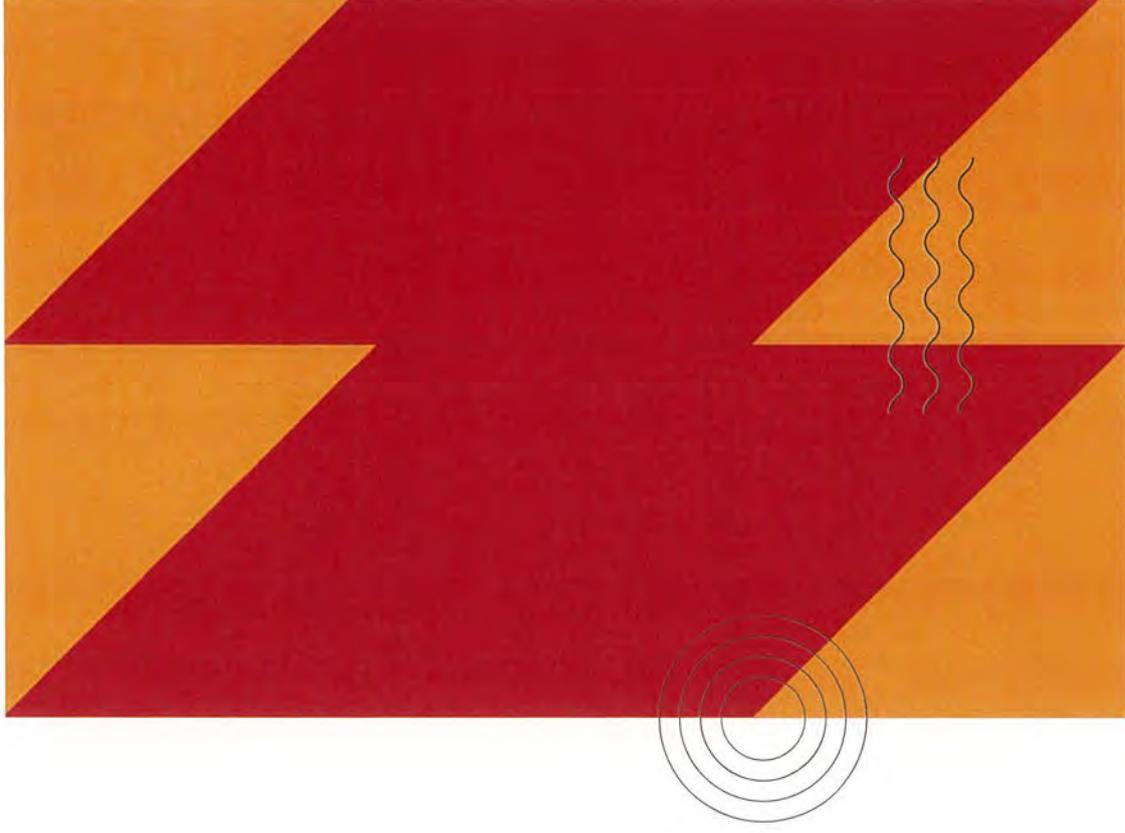


OLÉ FOOTBALL ACADEMY

Olé Football Academy has been a stronghold for families of children pursuing a holistic education through sport in the greater Wellington community since 1997.

Currently, the academy works full-time with approximately 350 children from the greater Wellington region, not including the thousands of children that Olé's Grassroots Football In Schools Programme reaches on an annual basis, primarily engaging with students from low-decile schools.

Olé Football Academy has a "no-barriers-to-entry clause" meaning that all children interested in pursuing a holistic education through sport are offered the opportunity to play no matter a family's socioeconomic status. No child has or will ever be turned away from the academy due to the inability to pay programme associated costs. Olé also has an extensive scholarship programme to help families afford the opportunity for their children to play and pursue sport and education.



We Rely On Class 4 Funding

THE IMPACT A SINKING LID POLICY WOULD HAVE ON US

Class 4 gaming is critical to the impact that we are able to have at the Olé Football Academy in the Greater Wellington region. We are able to provide a stable, holistic educational opportunity for thousands of youths. Through Class 4 funding, we are fortunate to have the facility and staff required to provide a positive environment. Class 4 gaming accounts for approximately 50% of our overall budget. The other 50% comes from "user pays" paid by our players' families. Without Class 4 funding, our overall situation would be dire.

The only way for us to continue operating would require a combination of significant sacrifices that would have a serious impact on the community:

- a) The Olé Football In-Schools program, Street Soccer and Cannons Creek Football League would not be able to be staffed and administered.
- b) Staff and facilities would need to be reduced, which in turn reduces the amount of youths we can have in the programs at Olé.
- c) The user pays cost would be increased, putting further pressure on family budgets.



Impact

In the last 12 months we have been active in the local business community to seek other sponsorship. Many hours of planning, proposals and meetings took place and we are proud of the \$10,000.00 we received and are thankful for the support. However, this is not a viable option for replacing the Class 4 gaming funding that we receive. We will continue doing the best we can to attract community support and sponsorship, but we have already exhausted this pathway.

In addition, Class 4 funding cuts would result in staff reductions. Olé staff are already stretched in their time, and funding cuts would further stress resources. This would create less time for staff to think about and execute other funding options like sponsorship.

We are thankful for the Class 4 gaming funding that we receive, and strongly believe in the good that it creates in the community. The reality is that we are very dependent on Class 4 funding in order to survive as an organisation. We are not experts in problem gambling in the Wellington region, but it is important to us and we work to have as much information about the space as possible. We know that problem gambling exists, but we also know that there are good support services and it is a small portion of the population. More importantly, we do not see evidence to support the problem gambling numbers reducing as a result of lowering the number of gaming machine units.

Olé Football Academy does not agree with the proposed sinking lid policy and believes the status quo should remain.

We would like to present this submission in-person.

Our Support

"The Olé Academy sets high standards of training and behaviour and this has a highly positive influence on these young footballers both in their sporting development, but also academically and as good all round citizens. In that regard the Olé Academy has been a great addition to the community providing positive pathways for our young people and encouraging them to achieve their full potential.

I would whole heartedly say that the Olé Academy has been an excellent addition to the community and any support provided would go back into the development of our youth which can only be positive."

- Murray Lucas
Tawa College Principal

1st October 2020



To Whom It May Concern

The Ole Football Academy has been in the Porirua area since 1997 and plays a big part in providing many programmes to our youth in the Porirua basin. It has grown from it's early beginnings and now has a staff of 10 full time and four part time staff.

There are approximately 350 children from aged nine to 20 who go through the facility weekly. It boasts one of the best artificial turfs in NZ and the children train at their base in the Porirua Hospital grounds four times a week. This in itself keeps those children, some of whom are at risk, well focused and with a clear supporting pathway to becoming a valuable contributing adult in our community.

The Academy also provides football programmes to 12 primary schools along with many community programmes in the Porirua region.

Should the Academy have to close down because of a lack of funding, there would be a big hole in our community in the holistic and sporting area of our city.

Regards

Anita Baker
Mayor
Koromatua
mayor@porirua.govt.nz

poriruacity

Tel: 04 237 1400
porirua.govt.nz

Porirua City Council
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poriruacity

Gambling Venues Policy consultation

Absolutely Positively
Wellington City Council
Me Heke Kī Pōneke

Your views on the Gambling Venues Policy will help inform councillors and help finalise the new Gambling Venues Policy.

The Council will consider your feedback and the new policy, if adopted, will come into effect from 1 December 2020.

Submissions close at 5pm on Thursday 1 October 2020.

Your details

Your name* <i>David Wilson</i>
Your email, or postal address* [REDACTED]
You are making this submission <input type="checkbox"/> as an individual <input checked="" type="checkbox"/> on behalf of an organisation. Your organisation's name* <i>Die Football Academy</i>
I would like to make an oral submission to the Councillors <input checked="" type="checkbox"/> Yes [REDACTED] <input type="checkbox"/> No [REDACTED]
If yes, please give your phone number so that a submission time can be arranged*

*mandatory field

What is your preferred option?

<input type="checkbox"/> Option A Implement a sinking lid
<input type="checkbox"/> Option B Lower the caps on the maximum number of machines by 87, align zone names to the 2019 Representation Review and reinstate the Primary Activities Clause
<input checked="" type="checkbox"/> Option C Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is: The current ward caps should be retained. The relocation policy should be expanded to allow relocations within the CBD (currently the policy only allows venues to relocate from outside the Central Area Zone to within the Central Area Zone).

1011774

What strengths does your preferred option have over the other options?

Gaming machine funding is extremely important to a large number of community organisations within Wellington City. The current funding provided by the gaming trusts is vital. There is no replacement funding available.

The current caps strike a fair balance. It is appropriate that they remain. The introduction of a more restrictive policy will adversely affect community funding and increase the migration of the gambling spend to online providers. Offshore-based online gambling providers do not make any community grants, do not create any local employment, and do not pay any taxes to the New Zealand Government.

Is there any other information you want to include in your submission?

I also consider that it is fair and reasonable to expand the current venue relocation provision to enable existing gaming venues within the Central Area Zone to move to new, modern premises, to move to buildings that have a higher earthquake rating, and to move if the current landlord is imposing unreasonable terms.

Free Post WCC

**Absolutely Positively
Wellington City Council**

Me Heke Ki Pōneke



FREEPOST 2199
259/1001

Gambling Venues Policy - 2591001
PO Box 2199,
Wellington 6140



Submission to WELLINGTON CITY COUNCIL:
Proposed Gambling Policy [Class 4] 2020

SEPTEMBER 2020

1. INTRODUCTION

This submission outlines The Lion Foundation's (TLF) response to the Wellington City Council's proposed Gambling Venues Policy – Statement of Proposal 2020.

The Lion Foundation is one of New Zealand's largest gaming machine societies by venue number, machine number and money returned to the community through grants. We currently operate 117 electronic gaming machines (EGMs) at seven venues in Wellington City.

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

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

2. SUMMARY OF THE LION FOUNDATION'S POSITION

The Lion Foundation **does not support** the introduction of a sinking lid policy - **Option A**; which is the Council's preferred option.

The Lion Foundation submits, however, that given the current environment of high regulation and naturally reducing machine numbers as well as the fact that there is no evidence to support the finding that a reduction in venues or machines results in a reduction in problem gambling, it would be appropriate to retain the status quo – **Option C**.

Our full submission is set out hereinafter. We would appreciate an opportunity to present an oral submission.

3. ABOUT THE LION FOUNDATION (TLF)

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

Our focus is on compliance and the reduction of gambling harm. The Lion Foundation is not here to grow or promote Gambling.

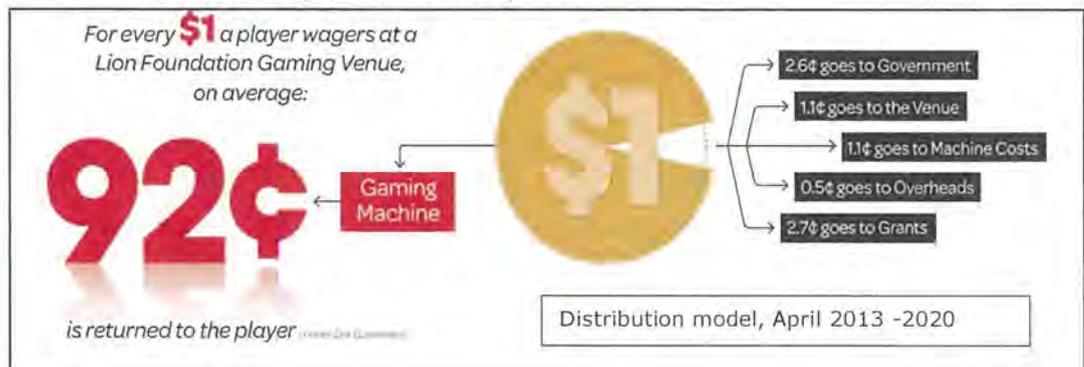
TLF aims to return at least 90% of funds back to the community of origin (where the funds were generated), with the remaining 10% of funds being returned to organisations providing a national benefit to all New Zealanders.

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

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

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

The Lion Foundation distribution of proceeds from its operations is:



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

4. THE LION FOUNDATION IN WELLINGTON CITY COUNCIL

We currently operate 117 electronic gaming machines (EGMs) at seven venues in the City.

In the period 1 January 2019 – 31 August 2020 TLF distributed:

- **\$2,754,930** within the Wellington City Council. The funds distributed can be represented as:
 - ❖ Sports - \$1,095,604
 - ❖ Community/Arts/Culture - \$901,141
 - ❖ Education – 197,059
 - ❖ Health - \$561,126

A complete list of grants distributed in Wellington City is attached – Annexure A.

- In addition to the above amount, grants totalling **\$365,363** were distributed to organisations which could provide evidence of a direct benefit to the residents of the city. This figure includes the contribution made from funds generated by the gaming operations in Wellington City for National organisations (see table below).

It should also be noted that The Lion Foundation distributes community funds to organisations providing **emergency services**. These organisations receive little or no central government funding. By

way of example – in the period March 2017 – February 2020 an amount of \$633,013 has been distributed to Wellington Free Ambulance Service Inc to purchase frontline ambulances. Funds generated from the gaming operation in the Greater Wellington Region allows Wellington Free Ambulance Service Inc to continue to deliver lifesaving services to all New Zealanders.

The Lion Foundation also provides funding towards organisations that benefit all New Zealand Communities (National organisations). Some organisations funded include:

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

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

In addition to the distribution of gaming proceeds to a variety of organisations, “pokies in pubs” contributes to the micro economics of the City. The Social Impacts of Gambling in Wellington Report (*Report*) produced in support of the current policy review identifies the need to support local businesses and employers in Wellington, however it does not recognise the economic value currently generated by the gambling sector when concluding that a sinking lid policy is required. Venues that are licenced to operate class 4 gaming machines provide employment to numerous residents of the City. Payments are also made to Venue Operators that host gaming machines. This further supports the hospitality industry within Wellington City.

5. PROPOSED POLICY – A DISCUSSION

Adoption of Sinking Lid Policy – Option A

- As stated, The Lion Foundation does not support the adoption of a of a sinking lid policy and supports the retention of the status quo (Option C).
- There is, with respect, insufficient evidence to support a change in the policy. The 2015 Gambling Venues Policy, which imposes a cap on the number of EGMs in identified wards, is working. The Report identifies that the number of venues has *declined steadily from 74 in 2004 to 40 in 2019*. The report also identifies that the number of EGMs has also decreased *from a high of 1024 in 2004 to 626 in 2019*.
- The Report correctly identifies that money spent on Class 4 gambling is increasing, despite declining venues and EGMs. The statistics provided by the Department of Internal Affairs are

very clear in this regard. Population growth, amongst other factors, contribute to this increase.

- Furthermore, the Report acknowledges that 65 % of New Zealand’s adult population present as non-problem gamblers – with a small percentage presenting as low risk gamblers (3.3), Moderate -risk gamblers (1.5 %) and problem gamblers (0.1%).
- Figures from the Ministry of Health’s Intervention Client data¹ report that in Wellington City a total of 127 clients have sought help in the period July 2017 – June 2018. Of this number – 63 presented as *new clients*.
- The Gambling Venues Policy 2015, coupled with significant measures to minimise the harm from gambling machines is achieving the objectives of the Gambling Act – which seeks to balance the potential harm from gambling against the benefits of using proceeds from *pokies in pubs* for community fundraising. Significant measures to minimise harm, include by way of example (not an exhaustive list):
 - ❖ There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine;
 - ❖ There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won;
 - ❖ Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination;
 - ❖ ATMs are excluded from all gaming rooms;
 - ❖ All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling;
 - ❖ All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling;
 - ❖ All gaming venues have a harm minimisation policy;
 - ❖ All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training;
 - ❖ It is not permissible for a player to play two gaming machines at once;
 - ❖ The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).
- The Gambling Venues Policy 2015 is still in keeping with the Ministry of Health’s recommended policy of restricting locations and numbers of gaming machines based on the risk profile of the district.
- Despite rhetoric from the opponents of gambling, there is no evidence that a reduction in venues or machines results in a reduction in problem gambling². This statement is also supported by the Report which has informed the current review.

¹ https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#total_assisted

² National Gambling Study, MOH, 2012-2015. *The National Gambling Study (NGS) was the first NZ longitudinal study into gambling, health, lifestyles, and attitudes about gambling. Evidence to date shows that there is no correlation between the number of machines and the prevalence of people seeking help for problem gambling. Funded by the Ministry of Health, the NGS started in 2012 with a randomly selected national sample and followed those*

- Gaming machine numbers and the number of gaming venues has declined steadily since 2003. Since the peak in Class 4 gaming machine numbers of 25,221 in 2003, the number of machines has declined steadily with the latest figures showing 14,828 machines as at 31 March 2020. Venues numbers have declined from over 2000 venues in 2003, to 1078 at March 2020.³
- The New Zealand National Gambling Study: Wave 4 (2018) noted that the problem gambling rate risk did not change significantly from 2012 to 2015 and had remained the same over the last 10-15 years despite gaming machine numbers decreasing⁴.
- Of great concern is the fact that problem gambling associated with off-shore based online gambling is growing exponentially. Offshore online gambling providers do not have to operate in accordance with the Gambling Act, do not offer any harm minimisation features to protect players; do not contribute to New Zealand communities.
- Furthermore, offshore based online gambling poses considerable risk in that:
 - ❖ It is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
 - ❖ Has no restrictions on bet sizes;
 - ❖ Has no capacity for venue staff to observe and assist people in trouble;
 - ❖ Reaches new groups of people who may be vulnerable to the medium;
 - ❖ Provides no guaranteed return to players;
 - ❖ Is more easily abused by minors;
 - ❖ Is unregulated, so online gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend that they induce to also open an account and deposit funds.
- A sinking lid policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups. Reducing gaming machine venues reduces casual and recreational play. This reduces machine turnover and the amount of funding generated for grant distribution.
- It is short sighted to suggest that the effects of a sinking lid policy will only be felt over a lengthy period of time. One natural disaster in Christchurch significantly accelerated the effects of the sinking lid policy. Community organisations had no warning or time to identify and secure alternative funding sources.
- Most notably however, is the stark absence of a significant reason to support a policy change in the Social Impacts of Gambling in Wellington Report. In a time of economic crisis and recession, we respectfully submit that *now* is not the time to adopt a policy, significantly altering the City's previous approach to gambling, with a blunt instrument designed primarily to support political aspirations.

respondents over 4 years. The Study showed that despite a reduction in the number of machines from 18,000 in 2012 to 16,000 in 2018, the problem gambling risk did not change significantly from 2012 to 2015. Given population growth, per capita expenditure actually decreased over this period.

³ Department of Internal Affairs – Quarterly statistics

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

Relocation Policy:

- The Gambling Act 2003 was amended [September 2013] to enable venues to relocate and retain the same number of EGMs when a Territorial Licencing Authority consent has been obtained.
- Venue relocation is an effective harm minimisation tool – it allows for venues to relocate from high deprivation areas to more suitable areas.
- The current relocation policy contained within the Gambling Venues Policy 2015, allows for a venue relocations in certain situations:-
 - ❖ Relocation to Central Area Zone;
 - ❖ Relocation to an area identified as a “centre”, but excluding the Neighbourhood Centres, in the Wellington District Plan; and
 - ❖ The NCGMs in the new venue would not result in more NCGMs in a zone than is allowed under the policy.
- The existing relocation policy however does not permit relocation of venues within the Central Area Zone. Thus, where for example a venue is already operating in an earthquake prone building within the Central Area Zone, the venue cannot be relocated to a safe, more modern fit for purpose building. TLF submits that an amendment to the Relocations Class 4 Venues clause to permit relocations within the Central Area Zone will permit venues to relocate to new, modern premises which will in turn lead to a more vibrant and invigorated CBD.

6. SOCIAL COSTS OF GAMBLING - PROBLEM GAMBLING IN CONTEXT

Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued on 25 March 1988, 32 years ago.

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

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

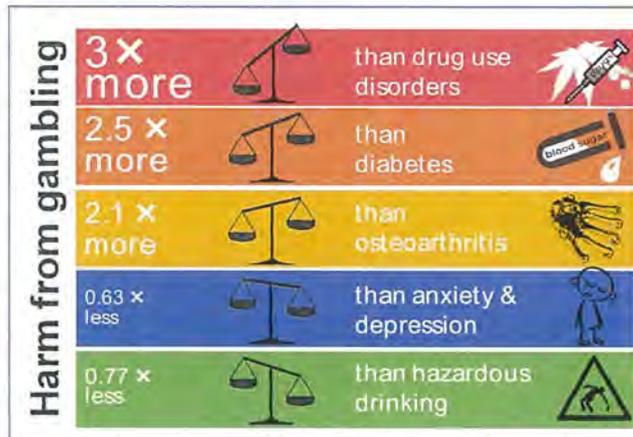
All gaming machine societies contribute to a problem gambling fund. This fund provides funding to the Ministry of Health to support and treat gambling addiction and to increase public awareness. As previously stated, a very well-funded problem gambling treatment service exists.

The Social Impact Of Gambling In Wellington Report (at page 25) *still* relies on the report from May 2017, a report titled “*Measuring the Burden of Gambling Harm*” which was produced for the Ministry of Health by Central Queensland University (CQU) and Auckland University of Technology (AUT). The

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

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

representation below has been used to represent the key findings of the report by, inter alia, the Problem Gambling Foundation:



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

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

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

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

7. HARM MINIMISATION

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

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

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

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

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

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

All venue staff are constantly reminded of their obligations in terms of the Harm Minimisation Policy. The Department of Internal Affairs has approved the TLF Harm Minimisation Policy.

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

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



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

8. COMMUNITY FUNDING

Approximately \$280 million is returned to New Zealand communities annually from the Class 4 funding model. Whilst Lotto NZ proudly supports over 3000 good causes every year⁹, the Class 4 gambling sector supports approximately 11 000 community organisations every year¹⁰.

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

Stuff.co.nz (3 April 2020) Sport Minister Grant Robertson: "One important community funding source that has dried up under COVID-19 is gaming machines and local trusts, which support grassroots programmes across most sports. I've been

⁹ <https://mylotto.co.nz/>

¹⁰ http://www.gamblinglaw.co.nz/download/Gaming_Machine_Grant_Data_2018.pdf

talking to the Minister of Internal Affairs about the way in which the gaming trusts, because clearly, there has been a significant decline in revenue through gambling. It will take some time to piece together what that package would look like, but we certainly understand the impact it's having, particularly on community sport, to not have that gaming-trust funding."

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

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

The full effects of Covid-19 have yet to become evident – more especially after the resurgence of the virus in our communities in August 2020. It is still very much unknown whether or not hospitality venues will be able to keep their doors open post the cessation of various Government subsidies. Class 4 Gaming provides employment opportunities for members of the community - including local hospitality businesses, trusts and societies, equipment providers and technicians – a significant number of jobs in our cities, towns and communities.

9. A RECENT DEVELOPMENT

The Salvation Army and Problem Gambling Foundation have recently released a report commissioned from the New Zealand Institute of Economic Research (NZIER)¹¹. This report suggests that that there would be significant economic benefit to the retail sector in both income and job creation if spending on class 4 "pokies" was stopped. The report estimates that this additional retail spending would generate an additional 1,127 full-time equivalent jobs for 1,724 workers, along with an additional \$58m of GST revenue and additional income tax of \$7m from the retail spend.

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

The authors draw a conclusion that the increased retail spending would then result in the retail sector channelling their increased profits into things like sports sponsorship. It is, however, more likely that any increased profits from the retail spending would be retained by the business owners, many who are large corporates, based offshore. It should also be borne in mind that there is no obligation (legal or otherwise) on any retail business owners to part with their profits for sponsorships as is being suggested.

¹¹ The retail employment and tax costs of Class 4 gambling in New Zealand - June 2020; NZ Institute of economic Research (Inc)

The report fails to consider the freedom of adult New Zealanders to spend money on a legalised form of entertainment. That spending provides them with legal entertainment, relaxation and social interaction. Those benefits would be lost if people were not able to spend their money on Class 4 gambling.

10. CONCLUSION

It is our submission that the Council's policy needs to optimise the balance between reasonable controls over the incidence of problem gambling against the generation of funds for the community from legitimate gaming. The proposed Sinking Lid Policy does not optimise this balance.

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

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

Annexure A – Grants 1 January 2019 – 31 August 2020

COMMUNITY - CULTURE –

ARTS

Young and Hungry Arts Trust	4,000
Wellington Zoo Trust	10,000
Wellington Volunteer Centre	10,000
Wellington Treasure Trust	6,000
Wellington Repertory Theatre Inc	1,500
Wellington Regional Orchestra Foundation Inc	8,000
Wellington Regional Folk Foundation Inc	4,000
Wellington Potters Assn Inc	2,217
Wellington Museums Trust Inc	60,000
Wellington Jewish Community Centre Inc	25,000
Wellington Jazz Orchestra Inc	6,000
Wellington Jazz and Music Festival Trust	10,000
Wellington Irish Dance Trust Board	20,000
Wellington City Mission (Anglican) Trust Board	30,000
Wellington City Council	11,250
Wellington Circus Trust	8,000
Wellington Brass Band Inc	10,000
Wellington Access Broadcasting Soc Inc	10,000
Vincent's Art Workshop Inc	10,000
Victoria University of Wellington Debating Soc Inc	573
United Pinoy Assn of Wellington Trust	2,000
Theatre Archives N Z Trust	2,000
Te Kura Toi Whakaari o Aotearoa: N Z Drama School Inc	10,000
Taki Rua Productions Soc Inc	12,000
Strathmore Park Community Centre Trust	1,209

Stagecraft Theatre Inc	3,000
Sri Lanka Assn of N Z Inc	2,000
Samaritans of Wellington Inc	6,000
Samaritans of Wellington Inc	4,332
Read NZ Te Pou Muramura Inc	12,000
Read NZ Te Pou Muramura Inc	17,000
Philanthropy N Z	10,000
Performance Arcade Trust	4,000
Orpheus Choir of Wellington Inc	5,000
N Z Tango Festival Charitable Trust	4,000
N Z School of Dance	6,000
N Z Portrait Gallery Trust	20,000
N Z Festival	120,000
N Z Family and Foster Care Fed Inc	30,000
N Z Family and Foster Care Fed Inc	30,000
N Z Choral Fed Inc Wellington Region	4,000
Nextstage Theatre Charitable Trust	3,000
Newtown Festival Trust	30,000
Kidzstuff Theatre for Children Inc	5,000
Kaibosh	28,000
Kahurangi Friends Inc	3,000
Good Bitches Trust	20,000
Dress for Success Wellington Inc	20,000
Creative Capital Arts Trust	45,000
Communities Action Trust N Z (CATNZ)	15,000
City Gallery Wellington Foundation	15,000
Citizens Advice Bureau Wellington Inc	10,766

Circa Theatre Inc	60,000
Changemakers Resettlement Forum Inc	10,000
Carter Observatory Trust	20,000
Capital Blues Inc	794
Bellyful Wellington South	1,500
Basin Reserve Trust	50,000
Arts Access Aotearoa Whakahauihou Katoa O Hanga Charitable Trust	8,000
Alliance Francaise Wellington Inc	5,000
	901,141

EDUCATION

W M F K A - Matairangi Community Kindergarten	3,000
W M F K A - Island Bay Kindergarten	5,000
W M F K A - Hataitai Kindergarten	4,000
W M F K A - Berhampore Kindergarten	4,000
Wellington High School and Com Ed Centre	974
Wellington East Girls College	7,000
Victoria University of Wellington Foundation	10,000
Tawa School	5,000
Tawa College	1,900
St Patricks College Wellington	10,000
St Marys College Wellington	4,000
St Brigids School	2,500
St Anthony's School	6,000
South Wellington Intermediate School	3,000
S A N Z - Britannia Sea Scout Group	5,000
Queen Margaret College	8,772
Parent Help Wellington Inc	5,000

Parent Help Wellington Inc	5,000
Onslow College	9,750
Newtown School	2,470
Newlands College	2,500
Mount Cook Preschool Inc	2,000
Linden School	3,750
Life Education Trust - Wellington City	15,000
Kidzone Public Servants Newtown Childcare Centre Inc	7,410
Kidz Corner Miramar Trust	5,000
Henwood Trust	20,000
Hampton Hill School	1,122
Family Space Charitable Trust	4,000
Crofton Downs Primary School	1,000
Birthright Wellington Inc	10,000
Big Brothers Big Sisters Wellington	12,000
Adelaide Early Childhood Centre Inc	911
2020 Communications Trust	10,000
	197,059

Health	
Youthline Wellington Inc	15,000
Youthline Wellington Inc	16,000
Wellington Womens Refuge Group Inc	10,200
Wellington Womens Health Collective	5,300
Wellington Volunteer Coastguard Inc	10,000
Wellington Sexual Abuse Help Foundation	7,000
Wellington Rape Crisis Inc	609
Wellington Hospitals Foundation	80,000

Wellington Free Ambulance Service Inc	50,000
Wellington Free Ambulance Service Inc	35,514
Vulnerable Support Charitable Trust	37,495
Te Ha Ora: The Asthma and Respiratory Foundation Charitable Trust	10,000
Te Ha Ora: The Asthma and Respiratory Foundation Charitable Trust	10,000
Surf Life Saving N Z Inc - Central Region	20,000
Shakti Ethnic Womens Support Group (Wellington) Inc	5,000
Riding for the Disabled Assn Wellington Group Inc	10,000
Perinatal Mental Health N Z	3,500
People First N Z Inc	8,000
Mary Potter Hospice Foundation Inc	30,000
Malaghan Institute of Medical Research	40,000
Lyall Bay Surf Life Saving Club Inc	6,276
Little Shadow Inc	3,232
Huntingtons Disease Assn (Wellington) Inc	5,000
Diabetes Youth (Wellington) Inc	5,000
Diabetes N Z Wellington Inc	6,000
Dementia Wellington Inc	12,000
Challenge 2000 Trust	15,000
CCS Disability Action (Wellington Branch) Inc	10,000
Cancer Soc of N Z Inc Wellington Division Inc	35,000
Asthma N Z Inc - Wellington Region	15,000
Arthritis N Z (Kaiponapona Aotearoa)	25,000
Age Concern Wellington Inc	20,000
	561,126

Wellington Water Polo Board	5,000
Wellington Veterans Tennis Club Inc	5,000
Wellington Touch Assn Inc	2,000
Wellington Tennis Club Inc	10,000
Wellington South Fencing Club	2,500
Wellington South Fencing Club	2,500
Wellington Softball Assn Inc	10,000
Wellington Scottish Athletics Club Inc	4,000
Wellington Rugby League Zone of N Z R L Inc	15,000
Wellington Rugby Football Union Inc	50,000
Wellington Rowing Club Inc	20,000
Wellington Regional Sports Education Trust	63,000
Wellington Heat Basketball Inc	8,000
Wellington Heat Basketball Inc	6,000
Wellington Harrier Athletic Club Inc	3,000
Wellington Football Club Inc	22,033
Wellington Floorball Club Inc	5,000
Wellington Fire Service Golf Club Inc	2,000
Wellington Diving Club Inc	8,000
Wellington Collegians Cricket Club Inc	4,000
Wellington College Old Boys & Victoria University of Wellington RFC Inc	60,000
Wellington College Old Boys & Victoria University of Wellington RFC Inc	60,000
Wellington Basketball Assn Inc	30,000
Waterside Karori Assn Football Club Inc	30,000
Waterside Karori Assn Football Club Inc	40,000
Victoria University of Wellington Cricket Club Inc	10,000

SPORT

Tup Radford Inter-Collegiate Yachting Trust	5,000
Tu-Nui-A-Te-Ika Inc	5,840
Thorndon Club Inc	5,000
Tennis Central Region Inc	20,000
Team Wellington Soccer Inc	20,000
Tawa Tennis Club Inc	15,000
Tawa Assn Football Club Inc	10,000
Star Boating Club Inc	4,500
Squash Wellington Districts Inc	20,000
Special Olympics NZ - Lower North Island Regional Council	12,000
Royal Port Nicholson Yacht Club Inc	12,000
Royal Port Nicholson Yacht Club Inc	25,000
Richter City Roller Derby	3,000
Primary Sport Wellington Inc	10,000
Port Nicholson & Poneke Cycling Club	10,000
Poneke Football Club Inc	10,000
Onslow Cricket Club Inc	5,000
N Z Fed of Multicultural Councils Inc	5,000
N Z Basketball Academy - Youth Basketball Club Inc	10,000
North Wellington Football Club Inc	8,000
North Wellington Football Club Inc	8,000
Northern United Hockey Club	3,000
Netball Wellington Centre Inc	3,200
Netball Wellington Centre Inc	4,484
Netball Central Zone Inc	20,000
Netball Central Zone Inc	40,000
Miramar Rangers Assn Football Club Inc	39,756

Miramar Rangers Assn Football Club Inc	30,000
Marist St Pats Rugby Football Club Inc	20,000
Marist St Pats Rugby Football Club Inc	15,000
Marist A F C Inc	6,924
Maranui Surf and Life Saving Club Inc	5,000
Kiwi Athletic Club Inc	897
Island Bay Softball Club Inc	2,000
GOYANZ Inc	20,000
Eastern Suburbs Cricket Club Inc	5,000
Diving N Z Inc	5,000
Cricket Wellington Inc	45,000
College Sport Wellington Inc	15,000
College Sport Wellington Inc	5,000
Capital Swim Club Inc	2,470
Capital Football Inc	8,000
Capital Football Inc	4,500
Bowls Wellington Inc	5,000
Badminton Wellington Inc	40,000
Badminton Wellington Inc	40,000
Athletics Wellington Inc	10,000
	1,095,604

Submission on Wellington City Council's Gambling Venue Policy

John-Luke Day

Preferred Option: Option A - A Sinking Lid

My preferred option is **Option A - A Sinking Lid**. It is the option that best addresses gambling harm from class 4 electronic gaming machines (pokies) in our communities. I have learnt about the terrible damage pokies cause. I hope the Council will listen to those who have suffered addiction at the hands of pokies and take action.

However, I believe Option A can be strengthened. I would like to see the proposed sinking lid include:

1. **a prohibition on venue mergers** - no permission should be given for bars and clubs that host pokies to merge and bring their machines together in the same venue;
2. **a prohibition on relocations** - no permission should be given for bars and clubs to relocate their machines to an alternative premises; and
3. **application to TAB venues** - it is unclear from the Statement of Proposal whether TAB venues that host pokies would be subject to the sinking lid; they should be.

For the remainder of this submission I would like to rebut several arguments you are likely to hear against the sinking lid proposal.

Community funding

It is likely many submitters will say they are concerned at the drop in community funding if a sinking lid is implemented. There are several responses to this concern.

First, if a sinking lid is implemented, funding from pokies will continue at similar levels for several years, if not decades. Only when a venue closes or decides not to host pokies will pokies numbers be reduced. It is a **long-term** phase out. It will provide ample opportunity to transition to alternative funding models.

Second, pokies as a community model is fundamentally broken. Societies that run pokies must only return 40% of GMP (losses on pokies) to community funding. It is a highly inefficient revenue-gathering mechanism. More problematic though is the fact that \$1 in every \$3 lost on pokies is from a player suffering a level of gambling harm. Pokies are clustered in the most deprived parts of the City. Our hobbies are therefore being funded to a large part by people who

can least afford to lose money. Community funding from pokies funding is NOT a net benefit to Wellington. And even it was, it is morally wrong to cause harm to one person in order to benefit another.

Online gambling

Some submitters may say that if pokies are reduced, players will shift to online gambling instead. Online gambling is less regulated, they may say, and the proceeds are not returned to the community.

The first response is there is little evidence that people who play pokies will move to online gambling. In fact what limited evidence there is suggests the opposite. The crown entity the Health Promotion Agency has recently surveyed pokies players about their gambling behaviour before and after the Covid-19 level 4 lockdown when pokies venues were closed. It found that fewer people were gambling online after lockdown, indicating pokies players were not shifting to online forms of gambling as a substitute for pokies.¹

Second, gambling on pokies is fundamentally different to gambling online. Pokies provide multi-sensory stimulation that online gambling on a personal device cannot replicate. Pokies are located in specially designed rooms, within a comfy environment at a bar or club. I know from having spoken to several members of the Newtown neighbourhood where I live that one of the lures of pokies is they are in a warm room on a cold day.

Third, and most importantly, the problems associated with online gambling are not within the purview of the Council's powers. In passing the Gambling Act, Parliament gave local authorities particular responsibility for class 4 gambling; not online gambling. To the extent there are issues with online gambling, that is a matter for the Central Government to regulate. It is not a legitimate argument that the Council should allow the harm caused by pokies to continue in order to avoid potentially greater harm from online gambling. Rather, the proper solution is for the Council to exercise its statutory responsibility in respect of pokies and for the Central Government to address online gambling.

Support for the hospitality sector

Some submitters may say that it is important to retain high numbers of pokies in order to support the businesses that host the machines. Those businesses receive payment for hosting machines and submitters may say it is important that the Council supports these businesses.

The Gambling Act 2003 is clear that hosting pokies is supposed to be cost neutral for venues. Section 5A provides that the only costs that can be deducted from gambling proceeds and paid to venues are costs that are "actual, reasonable and necessary". The intention of the Gambling Act is to have the pubs participate in the "community funding" system and to have their costs of

¹ Health Promotion Agency *Impact of Covid-19* (July 2020)
<https://www.hpa.org.nz/research-library/research-publications/post-lockdown-survey-the-impact-on-health-risk-behaviours> at 42.

doing so recompensed from the takings. But the intention of the Gambling Act is not to make "hospo" viable.

Advice from the Department of Internal Affairs about this is explicit. The Department requires that pubs and clubs do not rely on pokies revenue for survival.²

It should also be noted that under a sinking lid policy, current licence holders will still be permitted to host pokie machines until they choose otherwise. Consequently, a sinking lid will not force a reduction in machine numbers nor prevent venues from receiving revenue. A sinking lid policy supports "business viability" in exactly the same way as the other options proposed.

Lastly, a recent report from NZIER has analysed the economic implications of removing pokies machines from our communities.³ It has found:

- The cost to retail industry sales of class 4 gambling is estimated to be \$445 million for 2018/19 nationally.
- If there were no class 4 gambling, increased retail sales would generate an additional 1,127 FTE jobs for 1,724 workers.
- The GST revenue generated from new retail sales is estimated to be \$58.01 million.
- Income tax collected from additional retail workers is between \$7 - 7.6 million.

To isolate the financial impacts on businesses that currently host pokies is to ignore the wider impacts and opportunity costs pokies have to our economy.

Rates of problem gambling are low

People opposed to a sinking lid are likely to point to the relatively low rates of problem gambling in the community. The Council's social impact assessment, for instance, highlights 0.1% of the population are "problem gamblers" based on the PGSI criteria.

The difficulty with referring to rates of problem gambling generally is it does not target the specific harm caused by pokies, and more specifically, people who play pokies regularly. The Health Promotion Agency reports, according to their surveys, pokies players are more than twice as likely to be at-risk of some level of gambling related harm compared to other gamblers.⁴ It also found that about a third of people who played pokies at least monthly are at-risk gamblers. Problem Gambling Foundation cites Department of Internal Affairs research that shows \$1 in every \$3 lost on pokies machines comes from moderate or problem gamblers.

These findings are sobering. They should not be lost among broad statements about gambling harm generally.

² See DIA advice here at pages 6 and 11-12:

http://www.gamblinglaw.co.nz/download/Research/Pokies_in_New_Zealand_a_guide_to_how_the_system_works.pdf

³ NZIER *The retail and tax costs of Class 4 gambling in New Zealand* (June 2020)

https://www.pgfi.nz/uploads/7/1/9/2/71924231/final_report_-_diverting_gambling_losses_22_june.pdf

⁴ Health Promotion Agency *Pokies in pubs and clubs – participation, harm and spending Results from the 2018 Health and Lifestyles Survey for past-year pokie gamblers in pubs and clubs* (2019)

<https://www.hpa.org.nz/research-library/research-publications/pokies-in-pubs-and-clubs-%E2%80%93-participation-results-from-the-2018-health-and-lifestyles-survey>.

I wish to present an oral submission to Council.

John-Luke Day



Gambling Venues Policy consultation

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Your views on the Gambling Venues Policy will help inform councillors and help finalise the new Gambling Venues Policy.

The Council will consider your feedback and the new policy, if adopted, will come into effect from 1 December 2020.

Submissions close at 5pm on Thursday 1 October 2020.

Your details

Laura Kelly

Your name*
Your email or postal address*
You are making this submission <input type="checkbox"/> as an individual <input checked="" type="checkbox"/> on behalf of an organisation. Your organisation's name <i>Wellington Irish Dance Trust Board</i>
I would like to make an oral submission to the Councillors <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please give your phone number so that a submission time can be arranged*
*mandatory field

What is your preferred option?

<input type="checkbox"/> Option A Implement a sinking lid
<input type="checkbox"/> Option B Lower the caps on the maximum number of machines by 87, align zone names to the 2019 Representation Review and reinstate the Primary Activities Clause
<input checked="" type="checkbox"/> Option C Other (including no change to the existing policy, or another option we haven't listed). Please tell us what this is:

What strengths does your preferred option have over the other options?

Please see attached

Is there any other information you want to include in your submission?

Please see attached

Free Post WCC

**Absolutely Positively
Wellington City Council**

Me Heke Ki Pōneke



FREEPOST 2199
259/1001

Gambling Venues Policy – 2591001
PO Box 2199,
Wellington 6140

SUBMISSION TO WELLINGTON CITY COUNCIL

GAMBLING VENUES POLICY CONSULTATION



Wellington Irish Dance Trust Board

What Good Comes From Gaming Funding?

The Wellington Irish Dance Trust Board supports children, teenagers and adults by providing Irish dance lessons and performance opportunities to children and adults from all cultures. The organisation offers 25 lessons weekly to 75 children and 95 teens and adults. They develop fitness, teamwork and a strong work ethic and of course they make many new friendships.

Community Events

We like to support Community events, where the public can watch and take part in the Irish culture.

Each year we hold a free two-day festival at Te Papa Tongarewa, where dancers have the opportunity to perform to members of the community. Last year, over 800 people from Wellington and around New Zealand came to watch!

In March this year, we played a huge part in the St Patrick's Day Parade and performances on the Wellington wharf, where thousands attended.

We like to support other cultural groups and have performed at their celebrations, including Chinese New Year, the Diwali Festival and the Scottish festival - Pipes in the Park.

Always keen to support other charitable organisations, we perform annually at the Special Children's Christmas Party in Porirua and the Save the Children NZ fair at Homewood in Karori.

We also enjoy entertaining older members of the community at retirement homes. During the past year, we have visited Sprott House in Karori, Rita Angus in Kilbirnie, Village at the Park in Newtown, Longview Retirement Home in Tawa, and Malvina Major in Khandallah.

The Wellington City Council's annual Christmas celebration - A Very Welly Christmas is a highlight of the year for our dancers.



**SUPPORTING
WELLINGTON
COMMUNITY EVENTS**

What good comes from gaming funding?

Health and Fitness

The benefits to those who attend our classes includes a high level of fitness, increased motivation, focus, new friendships, goal setting, motivational skills, mental health support, confidence and presentation skills and a sense of pride in their achievements. We believe Irish dancing has had a positive impact on the dancers especially during the Covid lockdown this year. It has kept up their spirits and given them something to be motivated towards.

We hope that the events they are performing in this year will be beneficial to the Community in the same way.



RECENT WORKSHOPS

How difficult would it be to obtain alternative funding?

Our organisation continually works towards raising funds to support the dancers by:

- Raffles
- Sausage sizzles
- Sponsorship of the dance sections and programme at our annual festival
- Dancing for private events

It is becoming increasingly difficult and extremely time consuming to raise money in this way.

Our major costs are (approximately):

- Hall hire - \$20,000
- Teacher wages - \$100,000
- Festivals, workshops and competitions - \$25,000
- Performance costumes - \$30,000



**ST PATRICK'S DAY
2020 WELLINGTON
CITY PARADE**



Will facilities or events be cut if there is no further funding?

We currently hire 4 school halls and a community centre to teach classes. Since the 2016 Kaikoura earthquake which also badly shook Wellington, many buildings including the Wellington Irish Society clubrooms are no longer habitable. The lack of venues available to groups such as ours has meant that rental costs have increased dramatically. (In 2016, we were paying \$15 per hour. Now our hourly rate is \$40 per hour.)

Without funding, many classes will be cut and children whose parents are unable to travel to other classes will miss out.

The Capital City Feis, held annually at Te Papa Tongarewa has now become a popular event for Dancers and spectators from around NZ. We also had competitors from Australia in 2018 and 2019. With over 800 audience members, we see this as a growing event, bringing people into Wellington city. Unfortunately there are very few venues in Wellington that are of suitable size. We have used the Lower Hutt Little Theatre in the past but like many others it is currently closed for earthquake strengthening. It is hard to envisage how we could hire a venue such as this without support. Many of our dancers enjoy the competitive side of Irish dancing. Many families simply cannot afford the costs that this entails. To enable them to have the same opportunities as other dancers, we support them by assisting with competition entry fees, travel within NZ and overseas, performance costumes etc.

Without funding, some lower income families simply can't compete.

We offer a free Teacher Training Programme for our junior teachers. Many are students with no income and we feel that it is important to support and encourage them in gaining a dance teacher qualification.

Without financial assistance, we could not offer the programme and would lose prospective teachers.



Would there be an increase in costs if there was no funding and what would the impact be on participation?

We currently have 5 dancers on full scholarships. Our policy is that no dancer is turned away due to financial reasons.

In 2019, we opened a class in the Lyall Bay and Kilbirnie Community Centre where some of the dancers we teach struggle to afford the costs associated with an extra curricular activity. At this time, with a worldwide pandemic, several families have been affected by job losses. Without funding, we would most definitely have to raise fees and discontinue our scholarships. This would impact negatively on many dancers and they would no longer be able to participate.



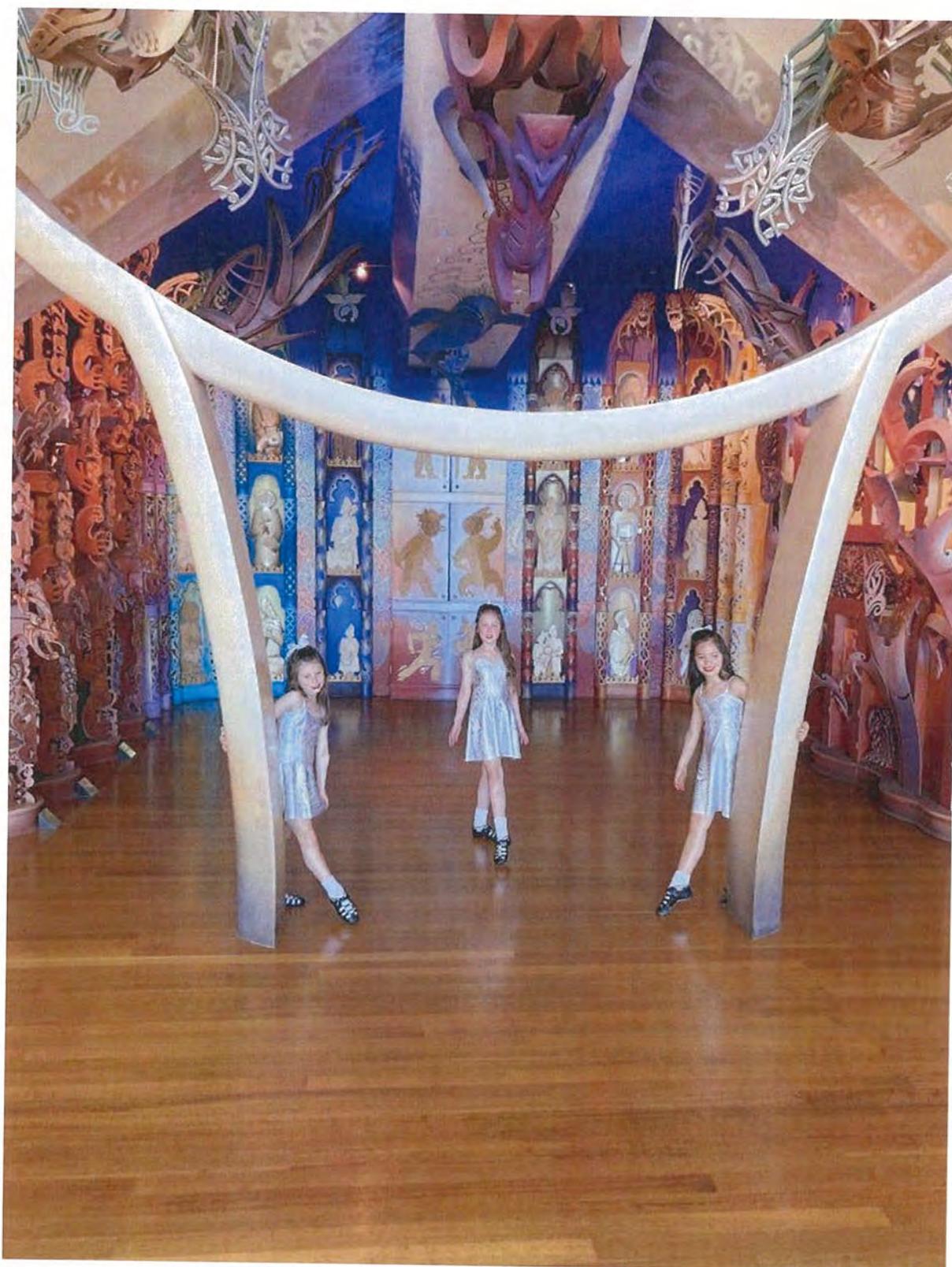
KUINI VIDAL

Kuini started Irish dancing when she was four years old, she is now 20 and is still just as enthusiastic and motivated when it comes to her dance! The Wellington Irish Dance Trust Board sponsors Kuini's lessons so that she can continue to benefit from Irish dancing and pursue her goals without being hindered by the costs involved.

"In the time I have been dancing, I have learned many lessons which translate to other aspects of my life. Dancing taught me to always be happy if I have done the best I could do, and that hard work will always pay off. I believe dancing contributed to the work ethic I now have and use to achieve in different ways in my personal life."

She is a five times New Zealand National Champion!





**CELEBRATING TE WIKI O TE REO MAORI &
INTERNATIONAL IRISH DANCE DAY
TE MARAE RONGOMARAEROA - SEPTEMBER 2020**

**The Wellington Irish Dance Trust Board
wishes to thank you for considering
our submission**





WELLINGTON CITY COUNCIL CLASS 4 GAMBLING AND BOARD VENUE POLICY 2020

Pesio Ah-Honi

National Director Pacific Services

Email: pesio.ah-honi@mapumaia.nz

Ph: 04 979 8326

This Mapu Maia submission was drafted by Mapu Maia. Although it contains some content included in the PGF Group submission (which Mapu Maia endorses), some sections specifically focus on the policy's impact on Pasifika peoples in Wellington City.

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Executive Summary

Mapu Maia is a Pacific problem gambling service dedicated to promoting and protecting the public health of all Pasifika peoples living in New Zealand. Mapu Maia advocates for better policies which will reduce gambling harm in the community and enable the resilience and health of Pasifika.

The best Class 4 gambling venue policy for Wellington City Council to adopt is a comprehensive sinking lid policy, with no relocations, no venue mergers, and no new venues permitted. EGMs or 'pokies' that are in pubs, clubs and TABs are the most harmful form of gambling in New Zealand (Appendix 2), and although PGF Group advocates for sinking lid policies, we believe even this policy does not go far enough to minimise harm from gambling in our communities.

Gambling machine numbers in Wellington City are reducing but only in numbers, from 676 to 633 over the last five years. We continue to have 50% of pokies in our most deprived communities; 30-60% of the money being lost on pokies by problem gamblers, and a national spend that has been trending upward since 2014.

While these factors remain, harm will continue. It is important to note that the extent of harm cannot be measured by presentations to treatment services alone, because evidence shows that most people do not present to services for help, and every person with a gambling problem affects approximately six other people. In addition to this, research supports that Pasifika people, who make up 8.1% of the New Zealand population, are more likely to live in areas with higher deprivation and greater opportunities to gamble, aggravating factors which contribute to gambling and potential gambling-related harm.²⁶

Measuring gambling harm is often referred to as the tip of the iceberg because each person with a gambling problem affects six other people.¹ Pasifika people are more than twice as likely to experience harm than those identifying as European/Other.²⁵

The extent of gambling harm in Aotearoa is often misrepresented in council hearings when it is said problem gambling is limited to 0.2% of the population. The Ministry of Health's *Strategy to Prevent and Minimise Gambling Harm 2019/2020 to 2021/2022*, estimates 252,000 people are being harmed, which is the population of Hamilton, our fourth largest city. An effective policy at a council level is critical and importantly, it is an area over which Council can exercise its authority.

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

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

Class 4 Gambling in New Zealand and Wellington

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

Almost half (48.3%) of the gamblers who sought professional help in 2017/18 cited non-casino pokies as their primary mode of gambling (Appendix 2). Over \$939 million was lost on pokies in the 2019 calendar year² or \$2,57 million a day. A conservative estimate is 40% of pokie losses are incurred by those with a gambling problem.³ EGMs are also disproportionately located in the poorest areas. There are five times as many pokies in the most deprived areas of New Zealand as the least deprived areas.⁴ The deprivation levels of Wellington City's gambling venue locations are included as Appendix 4.

Pacific Hubs and Pokie Hubs in Wellington City

Wellington City is home to 8,928 Pasifika people, with high concentrations in certain areas. Two notable geographical areas are the (Southern) Strathmore-Berhamphore corridor and the (Northern) Johnsonville-Tawa region.²⁷ Both areas have a prominent Pasifika presence. In conjunction with this, both geographical areas can be identified as pokie "hubs", as they take up a relatively-high proportion of Wellington City's current pokie machines.

The Strathmore-Berhamphore corridor is home to 2,940 Pasifika people, around 33.5% of Wellington City's Pasifika population. Of this community, 1,839 Pasifika people (62.5%) live in medium-high deprivation (NZDep decile 8).²⁸

There are 11 Class 4 venues and 172 pokie machines in Strathmore-Berhamphore corridor (Strathmore, Miramar, Kilbirnie, Rongotai, Newtown and Island Bay). That is 27% of the Territorial Local Authority's (TLAs) total machines, the second largest cluster outside of the CBD.

Both Johnsonville and Tawa collectively hold 1,986 Pasifika people, just over 22% of Wellington City's Pasifika population.²⁹

There are 8 Class 4 venues and 113 pokie machines between Johnsonville and Tawa, 17.8% of the TLA's total machines and the third largest cluster outside of the CBD.

Both hubs combine to make 45% of Wellington City's pokie machines. When adding these two hubs with the CBD hub (Te Aro, Lambton, Pipitea) of 261 pokie machines, it amounts to 546 pokies machines, 86% of the TLA's total. There are no other significant clusters making up the remaining 14%, meaning there are three pokie hubs in the Wellington City region, two of which are Pasifika-dense areas.

Mapu Maia submits that Pacific communities are not at fault for 'living in the wrong geographical area', but that Class 4 pokie machines are spread inequitably which in turn place Pasifika at risk of socioeconomic harm. Mapu Maia submit that a comprehensive sinking lid policy can go some way to address these harms.

Gambling in Wellington City

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

- 40 gambling venues hosting 633 EGMs – a machine for every 258 adults in the City.
- 20 of the 40 gambling venues are sited in areas classed as having medium-high levels of deprivation (Health index 7-8). A breakdown of the progression of Class 4 gambling venue locations versus deprivation is included as Appendix 4.
- \$40.72 million lost to pokies in 2019; \$111,500 a day; each EGM making an average of \$64,300 during this period.
- Between Johnsonville and Tawa alone, \$8,625,732.81 was lost to pokies in 2019; each machine making an average of \$76,333 during this period. Note, this is higher than that of the TLA average.

Social cost of gambling

Harmful gambling and children

Children suffer greatly as a result of harmful gambling. They can regularly miss out on basic essentials if a parent has gambled away household money and there is a far greater risk the children of problem gamblers will inherit the same issue themselves.¹⁰ One in five Pacific youth recorded that they worry about the level of gambling in their homes, with one in nine experiencing at least one household problem.²⁶

Family problems and violence

The Ministry of Health and Auckland University of Technology have recently released research highlighting the links between problem gambling and family violence. Fifty per cent of participants (people seeking help from problem gambling services) claimed to be victims of family violence, and 44% of participants claimed to be perpetrators of family violence, in the past year.¹¹ People living in areas of high social deprivation were 4.5 times as likely to experience gambling-related arguments or money problems related to gambling. As mentioned in this submission, Pasifika are over-represented in highly deprived communities, thus making the establishment of pokie machines in Pacific-dense areas a concern.²⁵

Sinking lid policies

Mapu Maia submits that a comprehensive sinking lid, with no relocations or club mergers permitted, is the best policy to control the growth of gambling and minimise harm. A comprehensive sinking lid policy will ensure that Pasifika, among other at-risk groups will be protected in that there can be no expansion of Class 4 establishments, only gradual decline. This type of policy ensures pokies that currently exist cannot move to another venue.

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

A sinking lid policy is compromised where machine relocation is permitted and/or venues and clubs are permitted to merge. Allowing EGMs to be moved around an area means the machine numbers stay the same. Allowing mergers also enables the maintenance of existing numbers and risks creating 'pokie hubs'. Research supports the argument that increased numbers of EGMs leads to increased problem gambling prevalence.⁹

Mapu Maia advocates for the health of all Pasifika living in Wellington City irrespective of whether they reside in its three identified pokie hubs. We support a comprehensive sinking lid policy with prohibition of venue relocation/mergers so no harm is simply shifted from one community to another.

Mapu Maia recommendations on gambling policy

Mapu Maia recommends the policy should include the following two provisions:

- **No relocations:** If a venue with EGMs is forced to close or voluntarily closes, the council will not permit the EGMs to be relocated to any venue within the council area.
- **No club mergers:** There will be no club mergers under any circumstances.
- **A ban on any new venues:** No permit will be given to operate any new venue or club in the council area if that venue proposes having EGMs, including TAB venues.

Mapu Maia recommends these provisions:

1. Restrictions on venue and machine consents:

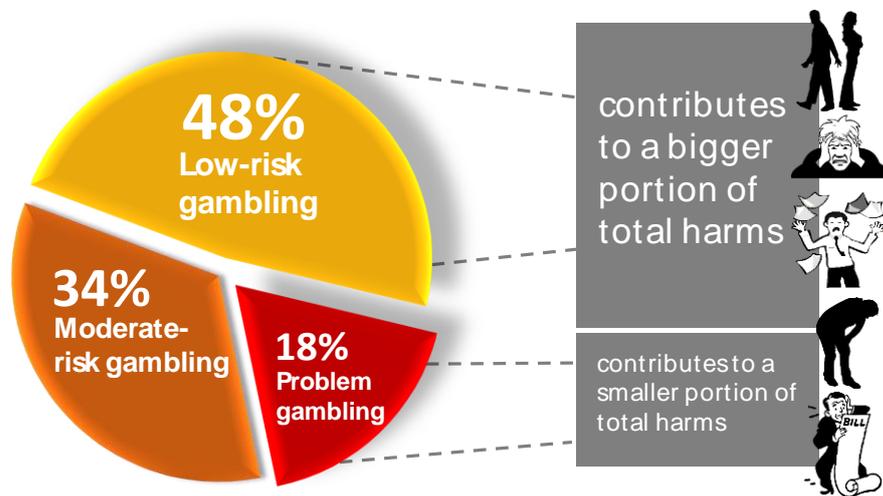
- (i) The Council will not grant consent for the establishment of any additional Class 4 venues or additional gaming machines under this policy.
- (ii) Venue relocation is prohibited. A gambling venue consent is for one venue (one premises) and is not transferable to another venue. The consent is given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

Mapu Maia recommends that the Wellington City Council include Best Practice Guidelines with the policy and encourages council to undertake a duty of care in monitoring venues.

Appendices

Appendix 1. Measure of gambling-related harm

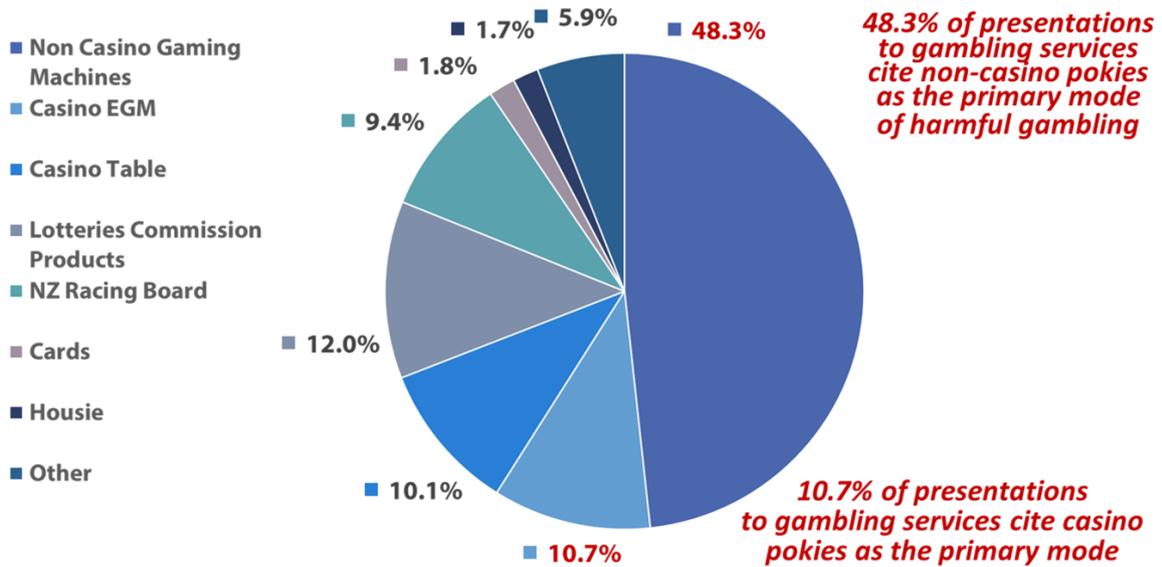
Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.



Appendix 2. Clients assisted by primary gambling mode

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

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



Appendix 3. Gambling expenditure statistics

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

Gambling operators' key financial statistics (actual)

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



Te Tari Taiwhenua
Internal Affairs

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

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

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

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

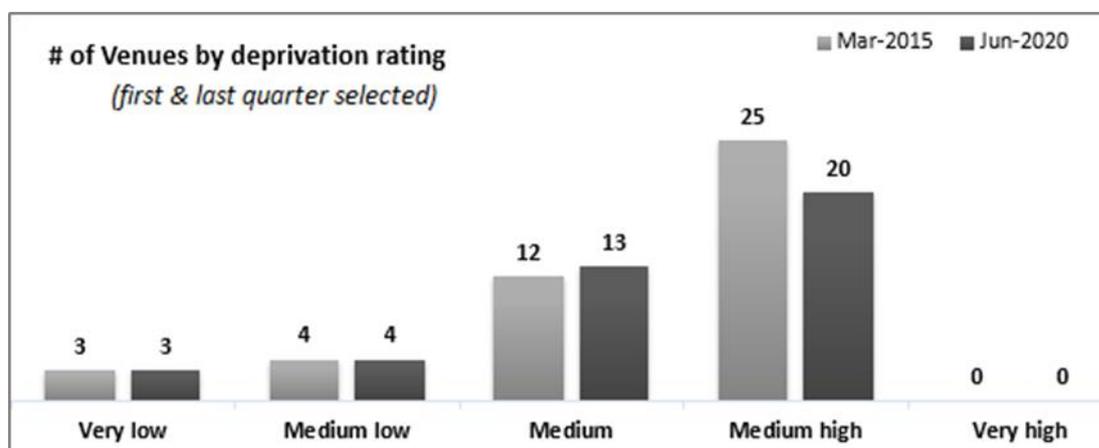
Please disregard previously released gambling expenditure statistics for the above financial years.

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

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

Appendix 4. Deprivation of gambling venue locations for Wellington City

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



¹ Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.

² Abbott, M., Bellringer, M., & Garrett, N. (2018). *New Zealand National Gambling Study: Wave 4 (2015). Report number 6*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

³ Goodwin, B. C., Browne, M., Rockloff, M. & Rose, L. (2017). A typical problem gambler affects six others. *International Gambling Studies*, 17:2, 276-289. doi: 10.1080/14459795.2017.1331252

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

⁵ Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.

⁶ The Department of Internal Affairs Te Tari Taiwhenua. (2020). *Class 4 Gambling Key Performance Indicators Updated 12-February-2020*. Retrieved from [www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Statistics/\\$file/C4-A3-KPIs-2019.pdf](http://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Statistics/$file/C4-A3-KPIs-2019.pdf)

⁷ Productivity Commission. (2010). *Gambling*, Report no. 50. Canberra, Australia.

⁸ Allen & Clarke. (2015). *Informing the 2015 Gambling Harm Needs Assessment*. Report for the Ministry of Health, Wellington: Allen & Clarke Policy and Regulatory Specialists Ltd.

⁹ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>

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

¹¹ Auckland University of Technology. (2017). *Problem Gambling and Family Violence in Help-Seeking Populations: Co-Occurrence, Impact and Coping*. Wellington: Ministry of Health.

¹² Abbott, M., Storer, J., Stubbs, J. (2009). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9(3), 225–244.

¹³ As above.

- ¹⁴ Allen & Clarke. (2015). *Informing the 2015 Gambling Harm Needs Assessment*. Report for the Ministry of Health, Wellington: Allen & Clarke Policy and Regulatory Specialists Ltd.
- ¹⁵ Hancock, L., O'Neil, M. (2010). *Risky business: Why the commonwealth needs to take over gambling legislation* (Alfred Deakin Research Institute). Retrieved from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>; Francis Group. (2009). *Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health Manatū Hauora*
- ¹⁶ Abbott, M., Bellringer, M., & Garrett, N. (2018). *New Zealand National Gambling Study: Wave 4 (2015). Report number 6*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.
- ¹⁷ As above
- ¹⁸ For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>
- ¹⁹ Statistics New Zealand (2019). *2013 Census – Major ethnic groups in New Zealand*. Retrieved from <https://www.stats.govt.nz/infographics/major-ethnic-groups-in-new-zealand>
- ²⁰ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ²¹ For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>
- ²² Statistics New Zealand (2019). *2013 Census – Major ethnic groups in New Zealand*. Retrieved from <https://www.stats.govt.nz/infographics/major-ethnic-groups-in-new-zealand>
- ²³ Sapere Research Group. (2018). *Gambling Harm Reduction Needs Assessment*. Wellington: Ministry of Health.
- ²⁴ As above
- ²⁵ Ministry of Health, 2019. *Strategy to Prevent and Minimise Gambling Harm 2019/2020 to 2021/2022*: Wellington: Ministry of Health
- ²⁶ Bellringer, M.E, Prah, P., Iustini., L., & Abbott, M. (2019). *Gambling behaviours and associated risk factors for 17 year old Pacific youth*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre. Report for Ministry of Health.
- ²⁷ Capital & Coast District Health Board. (2019). *Pacific Population Health Profile. Analysis to support localities planning by CCDHB*. Report prepared for Capital and Coast District Health Board.
- ²⁸ As above
- ²⁹ As above
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From: Ross Jamieson

Sent: 24 September 2020 14:26

To: BUS: Policy Submission <policy.submission@wcc.govt.nz>

Cc: Jamie Collier

Subject: Submission to the WCC : Gambling Venues Policy 2020

Dear Sir / Madam,

I am writing to provide our submission to the WCC concerning the Gambling Venues Policy 2020.

As Chair of the Toitu Ponake Community & Sports Centre Incorporated ("the**hub**"), based at Kilbirnie Park, I represent our Management, Staff & Board in registering our strong support for **Option C** (being the status quo).

Since our official opening in 2017, the**hub** has made a significant and positive impact on the people of the Eastern Suburbs and greater Wellington. I am proud to attach our **Overview Document (Past, Present & Future 2017-2020)** which not only includes example images of the diverse range of community events we host, but also demonstrates our staggering **763% increase in community bookings**. Our stated vision, purpose and values focus on improving the social and physical health of our community, along with their mental wellbeing. This is in line with WCC's own health policies and initiatives. If it had not been for the disruption of Covid19, the**hub** was well on target to growing our 2019 community and club use by further 30% again.

Whilst the**hub** welcomed a WCC annual plan contribution of \$750k towards our construction costs in 2016-2017, the total expenditure was delivered on budget at \$2.5m. The balance of \$1.75m was made up of member Club contributions (\$250k), Lottery Grants Board (\$500k) and Class 4 gaming funding (\$1m). **Class 4 funding contributed towards 40% of our total build costs**. After 4 years of dedicated fund raising by our volunteer members, we are in no doubt that without the impact of Class 4 funding, we simply would not have the**hub** - and all the community good it delivers each day.

Whilst we are currently investigating a formal booking system to support our operations, our management estimate that the**hub** welcomes on average **1,500 - 2,000 people a week** through our social, meeting and physical training rooms. This ranges from people involved in Rugby, Darts, Netball, Softball, Swimming, Diving, Karate, Yoga, Child Care, First Aid Courses, Fencing, Family Celebrations, Funerals, Church Groups, along with many other community gatherings and events. Our membership and visitors represent all walks of Wellington life, we are diverse, welcome multiple cultures, socio groups, all genders and ages ranging from 4 - 95 years. We boast 1,800 members associated with our foundation clubs, with this number increasing as we attract and welcome new groups to the**hub**. Some of these are established groups moving to our venue, whilst others are new groups that are forming simply BECAUSE the**hub** was available and affordable. In 2019 we were awarded a WCC Accessibility Award in recognition of our engagement with our community.

Since its opening, the **hub** has never called on the WCC for operational support or funding.

For the year ended 31 March 2020, it cost us \$340k to operate the **hub**, including maintenance, wages for our 1.75 staff, building lease and other multiple OPEX costs. The building is valued at over \$7m, with our landlord, Ponoke Rugby Club, covering the rates, insurance and depreciation costs. Our 1.75 staff spend 75% of their time welcoming and managing club and community groups to our venue. The balance of their time is devoted to operational matters and administration.

Our \$340k of costs are covered by :

* Membership Fee's	7%
* Venue Hire Fee's	34%
* Food & Beverage Profits	4%
* Sponsorship & Other Income	8%
* Class 4 Funding	47% (\$160k)

As you can see, the Class 4 funding is **absolutely vital** to our operational viability and our biggest source of revenue. Whilst over time we might be able to squeeze a few more % points out of venue hire and membership fee's, this would come with the risk of our venue becoming unaffordable to club and community groups. Corporate sponsorship is exceptionally hard, and time consuming, to attract, and no longer comes in large figures. As an example, our biggest and highest profile club, Ponoke Rugby Club, worked exceptionally hard in 2020 to sell their front of jersey key logo mark, for both their top teams, earning only \$5,000 per annum from that.

If, the WCC moves to reduce the amount of Class 4 funding available to the **hub**, I am in no doubt that we will become unviable. We would not be able to replace that income, so would need to balance our books by either :

- * seeking WCC OPEX funding (year on year)
- * reducing our staff by 50%
- * closing during weekdays and/or reducing operational hours
- * cancelling community health and recreation programmes we operate

Whilst this would a massive blow to our operation (potentially the end of it), and undermining the successful foundations our waged staff and hundreds of volunteers have built, it would also be directly at odds with the WCC's own health and wellbeing mandates and initiatives.

I would also add that at this time our hospitality venues require support, not the threat of diminishing business. My observation is that these venues provide safe and supported environments, whilst the distributing Trusts (we work with NZCT, One Foundation, Four Winds, Air Rescue and Lion Foundation primarily) operate to strict and well governed compliance procedures.

I encourage the WCC Councillors to vote for **Option C (status quo)** and allow organistions like ours to continue to deliver healthy social and recreational opportunities to the people of Wellington.

I would be willing to, and would appreciate, the opportunity to make an oral submission to the WCC at the appropriate time.

Thank you for your consideration and I would be pleased to respond to any questions you might have.

Yours sincerely,

Ross Jamieson
Chairman
the**hub**
Toitu Poneke
Kilbirnie Park, Wellington
W: www.toituponeke.com



Vision

A strong, dynamic, sustainable and inclusive **hub**, meeting the needs of its stakeholders and the community it serves.

Purpose

To support, strengthen, promote and advocate for sport, active recreation and community groups for children and adults, and to maximise the facilities, the partnerships and the opportunities the **hub** provides.

Values

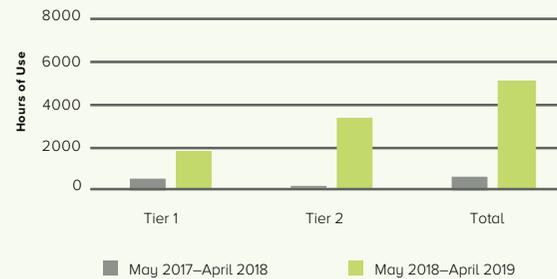
- A** All are welcome
- C** Community is at our heart
- T** Teamwork is essential
- I** Integrity in all that we do
- V** Vibrant environment
- E** Excellence is our aim

Past, Present and Future 2017–2020

763%

thehub saw a 763% total increase in usage over the last 12 months – specifically an increase of over 300% in Tier 1 usage and an astounding over 3,000% increase in Tier 2 usage. **This equates to an average of over 100 hours of ‘wider community use’ per week and growing.**

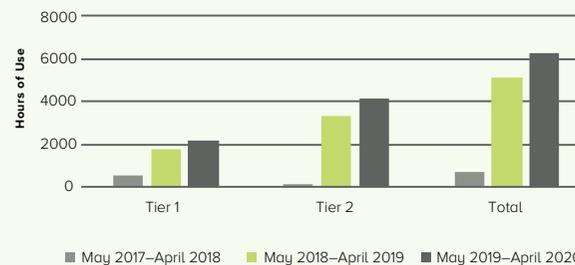
thehub May 2017–April 2019: A Comparison



20%

If we assume a modest 20% increase in Tier 1 usage over the next year, and a further modest 25% increase in Tier 2 usage over the same time frame, we can see that growth will only continue.

thehub May 2017–April 2020: Projection



Tier 1: Our Foundation Clubs

- Poneke Rugby Seniors & Juniors
- PK Softball and Capital Slowpitch
- Wellington Darts Association
- Capital Swim Club
- Wellington Diving Club
- Wellington South Fencing Club

Tier 2: Community Groups (a sample)

- Man Up Kilbirnie
- Gaelic Football & Hurling Club
- NZ Rugby Foundation
- Kenworthy Dojo
- Whanau Manaaki Kindergartens Association
- Yoga with Penina
- NZ Elite Underwater Hockey
- Wellington Indian Sports Club
- Kilbirnie Karate
- Sport NZ
- St Johns First Aid
- Coaching Courses
- Sport Wellington
- Capital City Scottish Country Dance Club
- Work & Income, Wellington Service Centre
- Ethiopian Community Centre
- Hurricanes
- All Blacks
- Black Ferns



For more information or bookings, please contact:

Jamie Collier, General Manager Email: toituhub@gmail.com Call: **027 435 4137**

Full venue, price and booking information: toituponeke.com

Address: **thehub, 49 Kilbirnie Crescent, Kilbirnie, Wellington**

