Ōtorohanga District Council

AGENDA

Gambling Venues Policy Public Hearing

8 JUNE 2021

Members of the Ōtorohanga District Council

His Worship the Mayor M Baxter
Councillor R Johnson (Deputy Mayor)
Councillor K Christison
Councillor B Ferguson
Councillor K Jeffries
Councillor R Dow
Councillor RA Klos
Councillor A Williams

Meeting Secretary: Mr CA Tutty (Governance Supervisor)
Notice is hereby given that a special meeting of the Ōtorohanga District Council will be held in Saint David’s Community Hall, Corner Ranfurly and Turongo Streets, Ōtorohanga on Tuesday 8 June, 2021 commencing at 9am.

3 June 2021

Tanya Winter
CHIEF EXECUTIVE

ORDER OF BUSINESS:

PRESENT
IN ATTENDANCE
APOLOGIES
DECLARATION OF CONFLICTS OF INTEREST

REPORTS
ITEM 166 SUMMARY OF PUBLIC SUBMISSIONS – REVIEW OF GAMBLING VENUES POLICY 2
Relevant Community Outcomes

- The Ōtorohanga District is a safe place to live
- Ensure services and facilities meet the needs of the Community
- Foster an involved and engaged Community

Executive Summary

The purpose of this report is for Council to consider all submissions received during the public consultation and make decision on the proposed changes to the Gambling Venues Policy.

Recommendation(s)

It is recommended that:

1. The report including the public submissions made during consultation be received;
2. Subject to any such evidence that may be presented at the hearing, and pursuant to Section 101 of the Gambling Act 2003, and Section 97 of the Racing Industry Act 2020, Council resolve to confirm a policy for Class 4 Gambling in Ōtorohanga.

Background

The Gambling Venues Policy recently underwent its statutory triennial review. As a result, Council proposed to remove the current ‘sinking lid’ in favour for a ‘controlled increase in venues’.

Public consultation began on Friday 19th February and continued until Thursday 1st April. A total of 80 submissions were received, with 29 indicating that they intend to present their submissions to Council at the hearing.

Current Situation

Summary of Consultation Process

Formal public consultation on the proposed changes ran from 19th February to 1st April and was publically notified as follows:

- Ōtorohanga District Council Website – www.otodc.govt.nz/home/consultations - from 19th February to 1st April
- Facebook - www.facebook.com/OtorohangaDistrictCouncil - 10th March
- King Country News – 16th March

Submitters from previous reviews were also notified directly, by email, that consultation was taking place.

Submissions

A total of 80 submissions were received, with 29 submitters indicating they would like to present their submissions to Council. Included in this tally were submissions from Gaming Machine Association of New Zealand (GMANZ), Clubs New Zealand, Pub Charity, New Zealand Community Trust (NZCT), Hospitality New Zealand- Waikato Branch, Problem Gambling Foundation (PGF), Waikato District Health Board – Public Health Unit, Hāpai te Hauora Māori Public Health, The Salvation Army Oasis – Waikato, Te Rūnanganui o Ngāti Hikairo, Child Poverty Action Group, Ōtorohanga Support House, Ōtorohanga Lyceum Club and Rotary Club of Ōtorohanga.
Five of the submitters supported the proposed change to a ‘Controlled Increase in Venues’ policy, with three of those suggesting further changes to the proposed new policy. These recommended the inclusion of a relocation clause in the new policy (3) and removing the requirement for gaming venues to be 50m apart (1).

75 of the submitters opposed the proposed change, remaining in support of the current ‘sinking lid’ policy. One of those submitters suggested that the proposed change was not in alignment with the current Long Term Plan (LTP) Key Objectives nor the current Annual Plan Mission Statement. A further three submitters advocated that the proposal does not align with positive community outcomes. Six submitters indicated that they are in favour of a “true sinking lid” policy, with no allowance for relocation or mergers of gambling venues. Five submitters argued for a complete eradication of gambling venues in the District.

Public Hearing
The public hearing of submissions will occur on Tuesday 8th June. During this day, Council members will ensure they are familiar with the submissions received. Upon the completion of the hearing, Council will deliberate and consider all information presented to them during the hearing. Council may then decide whether they are in a position to make a decision, whether they require further information or whether they need to defer decision making to a later date.

Considerations

1. **Significance and Engagement**
   Under the current Significance and Engagement Policy, Council must take into account multiple factors when assessing the significance of proposals and decisions, and the appropriate level of engagement. With regards to the Gambling Venues Policy, the following factors have been considered:
   - The legal requirement to engage with the community
   - The level of community interest is high
   - The likely consequences are controversial

2. **Policy and Plans**
   Council is currently following requirements under the Gambling Act 2003 and the Racing Industry Act 2020 in relation to the regular review of policies relating to Gambling Venues within the District.

3. **Legal**
   Due to the proposal including a change to the current Gambling Venues Policy, Council has a legal requirement to consult with the community in accordance with the Special Consultative Process detailed in section 83 of the Local Government Act 2002.

4. **Financial**
   Council does not currently receive any remuneration by way of licence or consent fees from Gambling Venues in the District. Current operational budgets have covered the cost of this review process.

5. **Iwi**
   Local iwi groups have been identified as stakeholders in this policy process and included in the notification of the proposal and the submission process during consultation.

Andrew Loe  
GROUP MANAGER – ENVIRONMENT

Claire King  
BUSINESS SUPPORT – REGULATORY

**ATTACHMENTS:**

Appendix A: Public Hearing Schedule  
Appendix B: Summary of Submissions  
Appendix C: Submissions
## APPENDIX A

### Ōtorohanga District Council Gambling Venues Policy

**Public Hearing Schedule – Tuesday 8th June 2021**

<table>
<thead>
<tr>
<th>Submitter Name</th>
<th>Submission Number</th>
<th>Time</th>
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<tbody>
<tr>
<td>The Gaming Association of New Zealand (GMANZ) – Jarrod True</td>
<td>1</td>
<td>9:05am</td>
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<tr>
<td>Clubs NZ Incorporated – Jarrod True</td>
<td>2</td>
<td>9:10am</td>
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<td>Pub Charity – Martin Cheer</td>
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<td>Ōtorohanga Support House – Deb Hill</td>
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<td>Ōtorohanga Lyceum Club – Dianne Murphy</td>
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<td><strong>Morning Tea – 10:10am</strong></td>
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<td>Kenneth Phillips</td>
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<td>Richard and Ruve Wallace</td>
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<td>Susan Stevenson</td>
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<td>Problem Gambling Foundation – Andree Froude</td>
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<tr>
<td>Hāpai te Hauora Māori Public Health – Selah Hart</td>
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<tr>
<td>Michelle Saunders</td>
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<td><strong>Lunch – 12:00pm</strong></td>
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<td>Paul Singh</td>
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<td>Ninfa Gantuangco</td>
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<td><strong>Opportunity for Joint Cases to be Heard 1:30pm to 2:00pm</strong></td>
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<td>Winifred Tapara</td>
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<td>Vianni Ward</td>
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<td>Name</td>
<td>Contact Person (If different)</td>
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<td>The Gaming Machine Association of NZ (GMANZ)</td>
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<td>Larry Graham</td>
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<td>Pub Charity</td>
<td>Martin Cheer</td>
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<td>Melissa Renwick</td>
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<td>Taisha Abott</td>
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<td>Susan Turner</td>
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<td>Susan Stevenson</td>
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<td>Paula Carr</td>
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<td>Michael Clapcott</td>
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<td>Lane and Adelle Martin</td>
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<tr>
<td>Tim and Barbara Jones</td>
<td>Yes</td>
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- Believe it is immoral that pokie machines are deliberately placed in areas of high deprivation
- Would like Council to lead the way in ensuring our community have less of these machines, not more
- Requests a true sinking lid with no allowance for relocations or mergers
## Index of Submissions

<table>
<thead>
<tr>
<th>Page Number</th>
<th>Submitter Name</th>
<th>Organisation</th>
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<td>Jarrod True</td>
<td>The Gaming Machine Association of NZ (GMANZ)</td>
<td>Yes</td>
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<td>Larry Graham</td>
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<td>Melissa Renwick</td>
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<td>Richard Wall</td>
<td>Waikato DHB – Public Health Unit</td>
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<td>Selah Hart</td>
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<td>Susan Turner</td>
<td>Te Rūnanganui o Ngāti Hikairo</td>
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The Gaming Machine Association of New Zealand’s Submission on Otorohanga District Council’s Gambling Venue Policy

Introduction

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

2. The Association supports the replacement of the sinking lid with a policy that allows for the controlled increase in venues.

3. In addition to the above changes, the Association asks that:
   - A relocation policy be included; and
   - The requirement that new gaming venues not be within 50 metres of another gaming venue be deleted.

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 2019, approximately $294m of grant funding was approved across 26,337 grants to 9,688 different organisations. In addition, over $75m was applied by TAB New Zealand ($17m), Youhtown ($8m) and various RSAs and Workingmen’s Clubs ($50m) to support their own activities. Of the grants distributed in 2019, 52% were sports-related. The second most popular category was community (19.7%). This funding is crucial.

5. Club venues, such as the Otorohanga Club, tend to use their gaming funds to make internal grants to benefit their own members and to cover the running costs of the clubrooms. There is therefore very little general community funding that is available from the 18 machines located at the Otorohanga Club.

6. The gaming machines that are located in commercial venues, such as the Kawhia Hotel, are operated by third party gaming societies, which have a policy of returning money back to the community in which it was generated. The Otorohanga District only has one commercial venue, the Kawhia Hotel, with a mere 5 machines. The current ability for Otorohanga District residents to access gaming funding is therefore extremely limited.

7. Enabling new gaming venues to be established will provide Otorohanga District residents with an extremely valuable funding source.

Other Benefits from Gaming

8. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2018 Health and Lifestyles Survey⁴ 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).

Revenue Breakdown

9. 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

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⁴ https://kupe.hpa.org.nz/#!/gambling/gambling-participation/any-gambling-activities
is returned to the player in winnings. The money retained is typically allocated as follows:

### Typical Distribution of Gaming Machine Profits

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<tr>
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<th>GST Inclusive</th>
<th>GST Exclusive</th>
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<tr>
<td>Government Duty</td>
<td>20%</td>
<td>23%</td>
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<td>GST</td>
<td>13.04%</td>
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<tr>
<td>Problem Gambling Levy</td>
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<td>DIA Costs</td>
<td>2.9%</td>
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<td>Gaming Machine Depreciation</td>
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<td>8%</td>
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<tr>
<td>Repairs &amp; Maintenance</td>
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<td>Venue Costs</td>
<td>13.9%</td>
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<td>Society Costs</td>
<td>1.74%</td>
<td>2%</td>
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<tr>
<td>Donations</td>
<td>37.83%</td>
<td>43.5%</td>
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**Gaming Machines – Key Facts**

10. 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, almost 33 years ago.


12. 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.

13. The Ministry of Health keeps a record of the number of people in each territorial authority who seek help via phone, text, email or the face-to-face counselling services that are available. The most recently available data (the year from July 2017 to June 2018) shows that no person from the Otorohanga District sought help for problem gambling.

14. 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.

15. 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).

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Existing Gaming Machine Safeguards

16. Having a policy that allows for future growth is appropriate given the significant measures that are already in place to minimise the harm from gaming machines.

17. 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.

18. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.

19. There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is $2.50. The maximum prize for a non-jackpot machine is $500.00. The maximum prize for a jackpot-linked machine is $1,000.00.

20. 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.

21. Gaming machines in New Zealand do not accept banknotes above $20.00 in denomination.

22. ATMs are excluded from all gaming rooms.

23. All gaming venues have a harm minimisation policy.

24. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.

25. 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.

26. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.

27. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.

28. It is not permissible for a player to play two gaming machines at once.

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

30. 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).

31. 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

32. 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.

33. A review of the study’s methodology produced by TDB Advisory\(^4\) 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.

34. 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

35. 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.

36. 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.

37. A suggestion is also made that the increased retail spending would then result in the retail sector channelling their increased profits into things like sports sponsorship. It is,

\(^4\) http://www.gamblinglaw.co.nz/download/TDB_Advisory_Report.pdf
however, more likely that any increased profits from the retail spending would be retained by the business owners, many of whom are large corporates, based offshore.

38. 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 2.65 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”

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

A Controlled Increase in Venues is Reasonable

40. Having a policy that allows for a controlled increase in venues is reasonable, given the current environment of high regulation and naturally reducing machine numbers.

41. 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).

42. The New Zealand National Gambling Study: Wave 3 (2014)\(^5\) noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

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

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

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Introducing a Relocation Policy is Reasonable and Sensible

43. Council is asked to further expand the policy to include a relocation provision. Enabling venue relocation is good for harm minimisation and good for the district as a whole.

44. In September 2013, Parliament recognised the merit in enabling venues to relocate, and expressly amended the Gambling Act 2003 to enable venues to relocate and retain the same number of machines when a relocation consent was obtained.

45. Venue relocation is a harm minimisation tool. Venue relocation allows venues to move out of high deprivation areas and residential areas, to a more suitable areas, such as the central business districts. Not allowing relocation simply entrenches venues in undesirable locations.

46. Adopting a relocation provision would be in accordance with the national trend. Over the last four years, almost all other councils that have reviewed their gambling venue policy have adopted some form of relocation provision. Currently, approximately 55 councils have a relocation policy in place.

47. A relocation policy permits existing venues to re-establish after a natural disaster or fire. This is reasonable.

48. A relocation policy enables venues to move out of earthquake-prone buildings, dangerous buildings and insanitary buildings. This is positive on health and safety grounds.

49. Enabling relocation allows venues (particularly clubs) to move away from large premises, with large car parking areas, where such land may be better used for affordable high-density housing. Given the unaffordability of housing, the introduction of a relocation policy is entirely appropriate.

50. A relocation policy is positive as it assists with the revitalisation of the district. It allows 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.

51. 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.
52. 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.

53. 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 relocation prevents landlords demanding unreasonable rentals as it gives the venue operator the ability to relocate to an alternative venue.

54. The following wording is suggested for the new relocation provision:

**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 were permitted to operate at the old venue immediately before the old venue licence was 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.
Removal of the Requirement That Gaming Venues Must be 50 Metres Apart

55. In order to encourage and facilitate gaming venues to be established in the central business districts, Council is asked to remove the requirement that the new site cannot be within 50 metres of another class 4 gambling venue.

56. It is appropriate on harm minimisation grounds to encourage venues to be located in central business districts, away from undesirable locations, such as residential areas and high deprivation areas.

57. The establishment of new venues in the central business districts should be encouraged and made possible. The current requirement for the site to not be within 100 metres of sensitive sites and 50 metres of other class 4 gambling venues makes the establishment of a new venue very difficult.

58. While there may be some rationale for not wanting a new licensed venue to be close to a school, church, or playground, there is no logical reason for preventing a new venue being established close to an existing gaming venue.

59. There is no evidence to suggest that having gaming venues located close to each other in one central area increases harm.

60. Having venues located close to each other will not result in new, large, casino-like venues offering more than 18 machines. The Gambling Act does not permit two gaming venues to be located within the same place: s 65(2)(k). Each gaming venue must be located within its own building and run as a separate, independent business. New gaming venues are limited to a maximum of 9 gaming machines.

61. Having gaming venues spaced 50 metres apart from each other is counter-productive on harm minimisation grounds as this increases access to gambling. If a township has three gaming venues, one in the far north, one in the middle, and one in the far south, gaming is easily accessible by residents living in the northern, central, and southern part of the town. If all three venues were located side-by-side in the northern part of the town, gaming would become less accessible to the residents living close to the central and southern part of the town.

Oral Hearing

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

3 March 2021

Jarrod True
Counsel
Gaming Machine Association of New Zealand
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027 452 7763
gmanz.org.nz
Otorohanga District Gambling Venue Policy Review

Introduction

Clubs New Zealand (Clubs NZ) is the leading association for clubs in New Zealand. We represent more than 300 clubs around the country, including chartered clubs, community clubs, cosmopolitan clubs, workingmen’s clubs, sports clubs and returned services associations.

Clubs NZ supports the replacement of the sinking lid policy with a policy that allows for a controlled increase in venues.

Clubs NZ also asks that Council considers including a relocation provision in the new policy.

Problem Gambling Presentations

The extremely low number of problem gambling presentations from the Otorohanga District confirms that a sinking lid is no longer required.

The Ministry of Health keeps a record of the number of people in each territorial authority that seek help via phone, text, email or the face-to-face counselling services that are available. The most recently available data (the year from July 2017 to June 2018) shows no-one from the Otorohanga District sought help for problem gambling during the year. The presentation data\(^1\) is as follows:

\[
\begin{array}{ccc}
2012/13 & \text{new clients 1} & \text{total clients seen 1} \\
2013/14 & \text{new clients 0} & \text{total clients seen 2} \\
2014/15 & \text{new clients 0} & \text{total clients seen 1} \\
2015/16 & \text{new clients 1} & \text{total clients seen 1} \\
2016/17 & \text{new clients 0} & \text{total clients seen 0} \\
2017/18 & \text{new clients 0} & \text{total clients seen 0} \\
\end{array}
\]

Extremely Limited Number of Gaming Venues

The Otorohanga District has experienced a dramatic decline in gaming venues. In 2003, the Otorohanga District had 5 venues and 51 gaming machines. The Otorohanga District currently only has 2 gaming venues with a total of 23 gaming machines:

Kawhia Hotel 811 Powewe Street, Kawhia 5 gaming machines (Pub Charity)
Otorohanga Club 107 Maniapoto Street, Otorohanga 18 gaming machines

Gaming Machine Funding

Funding from the Kawhia Hotel

The opportunity for Otorohanga-based community and sporting groups to obtain grant funding is extremely limited due to the lack of gaming venues. In 2017, 2018 and 2019, external grants totalling $143,662.00 were made (predominately from the Kawhia Hotel venue). These included grants to:

- Kawhia Volunteer Fire Brigade
- Waikato Region BMX Association
- Adaptive Surfing New Zealand
- Kawhia Rowing Regatta Club
- Otorohanga Swimming Club
- The Kawhia Community Projects Trust
- Waihi Volunteer Fire Brigade
- Kawhia Primary School
- The Friends of Kawhia Museum
- Otorohanga Domain Sports Association
- Maungatautari Ecological Island Trust

Funding from the Otorohanga Club

The gaming machines at the Otorohanga Club generate funding to support the club, the club’s members, the club’s sporting adjuncts, and other local community groups. The Otorohanga Club’s membership as at 31 March 2020 totalled 1,619. The club had 14 sporting adjuncts.

The Otorohanga Club’s gaming machines generated $393,030.00 in funding in the year ended 31 March 2020. This money was used to make community donations, member and community welfare payments, provide support to the sporting adjuncts, and enabled the club to purchase new assets to benefit its members. The funding was also used to assist the club with its running costs, including the payment of $17,757.00 in rates to the Otorohanga District Council.

Allowing New Gaming Venues is Reasonable

Allowing new gaming venues to be established in a controlled manner is reasonable, given the current environment of high regulation and naturally reducing 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 the same, despite gaming machine numbers declining rapidly (4,618 gaming machines have been removed from the market).

The 2012 National Gambling Survey\(^2\) 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.

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.

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

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).

The current sinking lid is unlikely to reduce problem gambling, but is reducing the amount of funding available to community groups in the Otorohanga District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel 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

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.

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.

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.

TAB New Zealand 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.

SkyCity has launched an offshore-based online casino with a large selection of gaming machine games – www.skycitycasino.com.

A September 2018 Cabinet paper\(^4\) 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.

The Cabinet paper notes that health professionals and gambling harm treatment providers have expressed concern that online gambling may be

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\(^4\) [http://www.gamblinglaw.co.nz/download/Online_gambling_Cabinet_paper.pdf](http://www.gamblinglaw.co.nz/download/Online_gambling_Cabinet_paper.pdf)
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.”

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 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.

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.

**Venue Relocation**

Section 97A of the Gambling Act allows existing venues to relocate and retain their current machine numbers. In order to undertake such a relocation, Council must have a relocation policy in place and grant a relocation consent. Council is asked to adopt a relocation policy. Venue relocation is positive.

Over the last five years, almost all councils that have reviewed their gambling venue policies have adopted a relocation provision. Currently, approximately 55 councils have relocation provisions in place.

A relocation policy has a number of benefits.

Allowing relocation enables venues to move out of low social-economic areas to more suitable areas, such as the central business district.

Allowing relocation enables gaming venues to move to new, modern, refurbished premises. Permitting 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.

A venue is sometimes required to relocate to adjacent premises due to its fixed lease coming to an end or as a result of public works acquisition. In such circumstances it is fair and
reasonable for the policy to permit the venue to continue its current gaming machine operation.

Allowing relocation enables venues to move out of buildings that may be earthquake-prone.

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 relocation prevents landlords demanding unreasonable rentals, as it gives the venue operator the ability to relocate to an alternative venue.

Enabling relocation permits venues to re-establish after a natural disaster, flood, or fire.

Enabling relocation allows venues to move away from large premises, with large car parking areas, where such land may be better used for affordable high-density housing.

Not allowing relocation entrenches the existing venues in locations that may be undesirable.

Queenstown Lakes District Council recently adopted a new, modern relocation provision (details below). It is submitted that similar wording should be adopted by the Otorohanga District Council.

**Venue Relocation**

A new venue consent may 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 of the Class 4 and TAB Gambling Venue 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, to a maximum of eighteen (18) machines.

In accordance with section 97A(2)(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 do not wish to speak at the oral hearing. I ask that Council has regard to my written submission.

Larry Graham  
Chief Executive Clubs New Zealand Inc.  
PO Box 11 – 749  
Level 5, 181 Willis Street  
Wellington

Telephone (04) 815 9936  
Email: Larry@clubsnz.com
Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

* Please note: Submissions will only be accepted via email.
* It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
* If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter’s Details

Full Name: Martin Cheer, CEO Pub Charity Limited

Contact Person: as above

Email Address: mc@pubcharitylimited.org.nz

Phone Number/s: ______________________ (Daytime) 0274 715 745 (Mobile)

Submission Ont Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☐ We support the current ‘Sinking Lid’ Policy
☐ We support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Attached

PCL wishes to speak to its submission and will attend in person.

Mc

Chief Executive
Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed __________________________ Dated 17/3/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please email your completed form to claire@otode.govt.nz. No paper submissions will be accepted.

Privacy Statement

All submissions (including the name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of this policy review process and hearing. All information collected will be held at Ōtorohanga District Council, 17 Maniapoto Street, Ōtorohanga with Submitters having the right to access and correct personal information.
Otorohanga District Council
Gambling Venue Policy Review 2021

Submission of Pub Charity Limited
PO Box 27009
Wellington
Contact: Martin Cheer CEO
martin@pubcharitylimited.org.nz
(04) 385 6100
Policy Response

The ODC is conducting the triennial review of its Class 4 Gambling Venue Policy for the period 2021-2024.

This will be the Council's seventh opportunity to review this policy and Council are proposing a change from the current sinking lid policy to a policy allowing new venues to be considered on a case-by-case basis.

Pub Charity Limited (PCL) supports this proposed Policy Option and would like to speak to these submissions.
Executive Summary

- New Zealand has one of the lowest problem gambling rates in the world\(^1\) and Otorohanga is a low-risk community for gambling harm\(^2\).

- Class 4 gambling for the overwhelming majority of the community provides a safe vehicle for entertainment, socialising, recreation, and a source of fundraising for the community. It also creates jobs and economic stimulus for local businesses.

- The proposed Otorohanga District Council Class 4 Gambling Venue Policy is entirely consistent with the purposes of the Gambling Act 2003 which has a balanced set of objectives including the controlled growth of approved gambling like Class 4\(^3\).

- The Ministry of Health reports that in the last 5 years only 2 people have sought help for any form of problem gambling in the Otorohanga TLA.

- Contrary to media claims by the Medical Officer of Health and consistent with contemporary research\(^4\) there is empirical evidence from the Ministry of Health that shows no correlation between gaming machine numbers and problem gambling prevalence rates in the community\(^5\).

  .... the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing.\(^6\)

- Approved forms of gambling like Class 4 are a lawful activity and unlike the inference from the Medical Officer of Health, who plays no active part in the Ministry of Health’s problem gambling strategy, spending on gambling is not an inherently harmful activity.

- Allowing one or more new Class 4 venues, under the controls in the Gambling Act 2003, into an existing low risk market like the Otorohanga community would be highly unlikely to increase harm.

- The current policy has over time all but destroyed the fundraising opportunity represented by Class 4 venues while gambling spending in the Otorohanga community on all the other forms of gambling available in the community, like LOTTO, TAB and online gambling, is unchecked.

- The lack of flexibility in the current policy represents the very real risk that should the current non club venue close Class 4 fundraising for the wider community would disappear altogether.

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\(^2\) KPMG/DIA/Ministry of Health Policy Assessment Tool

\(^3\) S.3(a) & (c) of the Gambling Act 2003

\(^4\) "Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?", Abbot et al, 2006


Introduction

Pub Charity Limited (PCL) currently operates 1 venue and 5 gaming machines in the Otorohanga District Council (ODC) TLA.

This low turnover venue is the sole source of gaming funding distributed in the Otorohanga District and has generated, from January 2018 to the present, $97,516.96 in 12 donations to Otorohanga organisations.

PCL has also distributed funds from its national pool to organisations that provide services to the Otorohanga District like the Starship Hospital Foundation.

Public Policy is by nature a balancing act between the interests of different parties. In the case of community-based gaming machines there are multiple stakeholders;

- Those that play the machines for enjoyment
- Businesses that host the machines and derive income
- People whose employment is dependent on the activity
- Community groups and their beneficiaries that received grants from the proceeds
- The general public expecting authorities to provide a safe environment
- Those that are harmed from their gambling and those that advocate for them

Council is proposing an alternative to the current sinking lid policy to allow a balance between permitting responsible gambling, raising funds for the local community, and minimising harm in the community.

The underlying assumption of opponents of this change is that there is an immediate and linear relationship between exposure, that is the number of gaming machines per capita, and levels of problem gambling in a community.

Empirical evidence, known for some time in the problem gambling sector, shows that there is no direct correlation between harm and exposure to gaming machine and gaming venue numbers.

The flawed ideology behind the concept encourages those opposing the presence of gaming machines in the community to suggest if a reduction in numbers is beneficial then outright prohibition is better.

Prohibition was not envisaged by the Gambling Acts 2003, quite the opposite, and such an objective sits outside of the legislated mandate.

The Gambling Commission determined as much in GC 03/07\(^7\) when it found;

> ‘The Gambling Commission considered that the effect of the condition was to reduce gambling generally, and that it cut across what the Commission considered one of the primary purposes of the Gambling Act: to permit gambling.’

\(^7\) The Gambling Commission, GC 03/07 Lion Foundation v DIA
Sinking lids - Exposure Theory and the Prevalence of Problem Gambling

Some submitters will no doubt oppose the policy change and insist that a sinking lid is required to be maintained as the ODC policy. The underlying reason for that policy position is again the belief that there is a linear relationship between exposure to gaming machines and levels of problem gambling in the community.

There is no evidence that sinking lids have had any impact on total gambling spend or problem gambling prevalence a fact recognised by researchers over the years as a false premise.\(^8\)

It should also be noted the proposed Class 4 Gambling policy does not cover;

- Lotteries outlets, which have doubled in recent years, associated with 10.8% of problem gambling help seeking annually
- ‘Other’ forms of gambling like online, poker and housie, responsible for 7.8% of all problem gambling help seeking annually (and growing rapidly)
- Internet based options including on line mobile and app based gambling products like LOTTO On-line, TAB racing and sports betting apps and accounts
- On-line casinos and gaming machines
- Overseas on-line casinos and sports betting agencies.
- NZ Racing Board on track and mobile based sports betting, associated with 7.8% of problem gambling help seeking

The current gambling legislation that enables local Government gambling venue policies, was introduced in 2004 before the emergence of high-speed domestic internet or smartphone technology.

At the time the main access to gambling opportunities was to physically visit a state licensed venue or retail outlet. It was intuitive to consider that limiting or controlling access to gambling venues was both a means of controlling the supply of gambling, gambling spend, and potentially reducing harm.

Such thinking in 2021 is outdated.

The imposition of sinking lids on community gaming machines in a number of jurisdictions, including the two largest markets, Auckland and Christchurch, has led to a decline by over one third, or about 8,000, of the community gaming machines since 2004 in the New Zealand Market.

Over that time total spending, in inflation adjusted terms, on community gaming machines has fallen by $512M or 36% since 2004.

Despite this reduction in Class 4 spending the total spending on gambling in New Zealand has actually increased by over $300M annually.

Some submitters, even those funded within the Ministry of Health framework, claim that reducing community gaming venues and machines leads to better health outcomes. This is not evident in Ministry of Health’s own statistics for problem gambling prevalence rates on a national or local level.

\(^8\) 'Do Problem Gambling and EGMs Go Together Like a Horse and Carriage'; Abbot, M; 2006
The problem gambling prevalence rate in New Zealand, already some of the lowest in the world, stabilised in the 1990’s and have remained unchanged.

After numerous and regular studies the NZ Ministry of Health states;

- ‘From examination of the findings of other surveys, taking account of methodological differences and their likely impact, it is concluded that there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006.

- Again adjusting for the likely impact of methodological differences, it is concluded that the prevalence of lifetime probable pathological and problem gambling have probably not changed since the last time a lifetime assessment was made in New Zealand (1999).

- From examination of previous New Zealand prevalence studies, 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.”

If historical findings are considered it should not come as a surprise that enforcing sinking lids has not delivered. The only surprise is they keep getting endorsed by some TLA’s.

Long standing advice from local and international problem gambling clinicians and researchers indicated that imposing caps or sinking lids on gaming machine numbers in the expectation of a reduced incidence of problem gambling, has not been effective.

‘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. ...’

Professor Max Abbot, AUT, 2006

‘We find no evidence that the regional cap policy had any positive effect on problem gamblers attending counselling, on problem gambler counselling rates, or other help seeking behaviour.’

Study of the impact of caps on Electronic Gaming Machines; The South Australian Centre for Economic Studies; May 2006

The Benefit of Regulated Gambling Venues

Community gambling will either be undertaken in controlled and supervised environments or uncontrolled and unsupervised places, like on-line.
Rather than being something to supress or prohibit, Class 4 venues represent a ‘best case’ scenario for the monitoring of intervention in gambling behaviour.

Class 4 Games must be approved and meet specifications, bet sizes and prizes are limited, and the issuing of credit to gamble is prohibited.

Staff in Class 4 venues are trained to a high standard to monitor and supervise gambling participants, intervening as required with information and, in extreme cases, exclusion from gambling.

Since 2003 and 2004 several Councils, on advice from anti gaming groups, imposed restrictions or sinking lids on future community-based gaming machine or venue numbers, encouraged in the belief that by simply reducing one point of access to gambling, as opposed to implementing measures which reduce the harm caused by problem gambling, that problem gambling would be reduced.

That type of advice will no doubt be offered to the Council, again during this review.

After 13 years of such policies, and a reduction of over 8,000 community gaming machines there is no evidence that this has had any impact on reducing the already very low prevalence rate of problem gambling in New Zealand.

Rather than facing restrictions the NZ Racing Board recently announced an aggressive expansion of products and technology as have the Lotteries Commission.

‘We are looking to attract more responsible gambling ... to double our active [TAB] accounts over the next couple of years.’


TAB World Cup Promotion - ‘Sign-up a new TAB account with the promotion code GOAL and we’ll load a $20 bonus into your new account after you make your first deposit of at least $10.

Available to new digital account customers only. Promotion Code GOAL must be submitted at sign-up. Your $20 Bonus will be released into new account after first deposit has been made. Limit of 1 new account bonus per participant. Offer applies to new TAB customers only. Full promotion terms and conditions available at tab.co.nz/depbonus. Please gamble responsibly.’

Reducing controlled and supervised community spaces for gambling, like Class 4 venues, will simply accelerate the existing trend for gambling to move to commercial, uncontrolled and unsupervised channels, a trend already causing a great deal of concern internationally.

‘Interactive and online gambling is having devastating consequences; new gamblers are more easily recruited online and gambling sites are accessible 24 hours per day.’

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10 NZ Racing Board CEO John Allen, Sunday Star Times, November 12, 2017
11 The Royal Australian & New Zealand College of Psychiatrists, September 2017
Myths About Community Based Gaming Machines

During TLA gambling policy hearings a number of false claims are consistently repeated by those who oppose gaming machines in the community and it is clear from comments made from time to time by some Councillors that these claims are given an unwarranted degree of credibility.

I want to take the opportunity to address some of the common misinformation.

Myth #1 - Gaming machines are designed by psychologists to be addictive.

In my 16 years of industry experience I have visited gaming design studios in Australia and the United States, and some of the world’s major gaming machine manufacturers.

I am yet to meet a psychologist and I am not aware of any being employed.

Gaming machine games must meet strict technical design standards published by the State, Federal or Government Regulator for each jurisdiction.

All gaming machine games in operation in New Zealand, including all design features, pay tables graphics, must meet the Australasian Technical Standards for fairness and compliance set by the Federal Government of Australia and the Government of New Zealand administered by the Department of Internal Affairs.

The claim that gaming machines are ‘designed to addict’ was tested formally in a recent High Court case in the state of Victoria, Australia.

In Guy vs Crown Melbourne Ltd No. 2 (2018) FCA 3 a player claimed that she had developed a gambling addiction as a direct consequence of the design elements of the gaming machine and that Crown Casino had failed in its duty of care to her by deploying the machines.

In dismissing the claimant’s case in its entirety, the presiding Judge Justice Mortimer stated;

“\textit{I have concluded that none of the applicant’s causes of action are made out.}”

As far as New Zealand is concerned the Ministry of Health reports that gambling addiction from all types of gambling affects 0.2% of the adult population and the Ministry of Health reports of that 0.2% two thirds are relapsed addicts already known to the system.

Despite over 500,000 people playing gaming machines annually the incidence rate of gambling addiction is less than 0.1% of the adult population which is one of the lowest rates in the world and of that 0.1% less than half are associated with community-based gaming machines so about 1 in 2,000.

In light of the fact that the adult population has a reasonable degree of exposure to these machines in licensed premises the suggestion that an incidence of addiction of 1 in 2,000 people hardly supports the argument that they are designed to addict.

Myth #2 – Gaming Trusts Target the Poor

The location of potential gaming venues is not set by the licence holders like Pub Charity but by central and local Government statute, regulation and policy.
Under the current Gambling Act 2003 the only venues considered suitable for class 4 gaming were licensed premises.

The underlying thinking is these are locations already focused on an activity for persons of or over 18 years of age with staff already trained in host responsibility. In addition, the Act prohibits gambling being the primary activity of the venue so a dominant primary activity is required.

These regulatory restrictions mean the majority of suitable premises to host gaming machines are Taverns, Pubs and Hotels located in areas zoned commercial or mixed use.

**Myth #3 – The Proceeds Do Not Benefit the Community**

Unlike LOTTO which applies 82% of the funds its raises to national groups most Class 4 gaming societies have policies that ensure the majority (90% for PCL) of funds raised within a TLA are returned to local organisations within that TLA.

The remainder is set aside for regional and national groups.

In addition to these funding outcomes PCL and other societies were taxed over $300M ($30.9M for PCL) by central Government as well as paying over $12M annually towards the costs of problem gambling research, intervention and public awareness.

On an EBITDA basis Class 4 gaming has the most efficient rate of return.

**The Purpose of Class 4 Gambling - Community Funding**

Pub Charity Limited funding to organisations based in the ODC TLA since the last review is attached.

Funding contributions to national organisations like Starship Foundation and St Johns have not been listed here but can be seen at www.pubcharitylimited.org.nz if required.

While these amounts were considered ‘lost to the community’ the benefits accrued through Government expenditure from the Consolidated Fund in which they are deposited. In fact, love them or loathe them the people of Otorohanga District directly or indirectly benefit from Class 4 gambling every day.

**Summary**

Empirical evidence contained in reports by the NZ Ministry of Health show that restrictive policies like sinking lids on class 4 gambling have had no impact on problem gambling prevalence in the community or on total gambling spend. What they have achieved is reduced community funding and encouraged the migration of spending to other gambling activities.

There is little risk in the ODC proposal to allow for new class 4 venues, which are restricted to a maximum of 9 machines under the Gambling Act 2003, to be considered on a case-by-case basis.

**PCL supports the proposed ODC Class 4 Gambling Venue policy.**
<table>
<thead>
<tr>
<th>Approval date</th>
<th>Organisation name</th>
<th>Description of Purpose</th>
<th>Amounts</th>
</tr>
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<tbody>
<tr>
<td>28/03/2018</td>
<td>Kawhia Primary School Board of Trustees</td>
<td>Sporting equipment for our school.</td>
<td>$4,868.48</td>
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<td>24/04/2018</td>
<td>The Kawhia Community Projects Trust</td>
<td>New Playground equipment</td>
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<td>26/06/2018</td>
<td>Kawhia Volunteer Fire Brigade</td>
<td>New rescue gear</td>
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<td>Kawhia Rowing Regatta Club Incorporated</td>
<td>Club uniforms for Annual regatta on 1st January 2019</td>
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<td>27/09/2018</td>
<td>The Friends of Kawhia Museum Incorporated</td>
<td>Install new air conditioning equipment</td>
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<td>6/12/2018</td>
<td>Maihihi Playcentre</td>
<td>Topping up soft fall under the playground equipment</td>
<td>$1,296.00</td>
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<td>31/01/2019</td>
<td>Kawhia Volunteer Fire Brigade</td>
<td>Contribution towards new community rapid response vehicle</td>
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<td>27/06/2019</td>
<td>Allergy New Zealand Incorporated</td>
<td>Costs of singular Epipen supply</td>
<td>$3,000.00</td>
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<td>KAWHIA GOLF CLUB INCORPORATED</td>
<td>Accommodation.</td>
<td>$839.13</td>
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<td>Club uniforms, medals and trophies.</td>
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Submission to Ōtorohanga District Council on the proposed Class 4 Gambling Venues Policy

March 2021
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Executive summary

- Gaming trusts returned $294 million to the New Zealand community in 2019 in grants, while implementing the Gambling Act's stringent requirements for preventing and minimising harm from gambling.

- Council gambling venue policies are critical to maintaining the infrastructure that allows community funding from gaming trusts to be sustainable long term. Sinking lid and no-relocation policies destroy this infrastructure. Councils need to take a balanced approach to community benefit and potential harm from gambling.

- Over the past 15 years, more than 10,000 gaming machines have been removed from New Zealand communities, but the problem gambling rate has remained static at an average of around 0.5% of the adult population over this time (currently 0.1%-0.2%, according to the most recent studies). This is among the lowest problem gambling rates in the world. Canada’s, for example, is 3%.

- A sinking lid is a blunt instrument that reduces community funding by removing the fundraising infrastructure (i.e. gaming machines within entertainment venues) over time and does nothing to reduce problem gambling, which is a complex addiction.

- Research has shown that allowing gaming venues to relocate out of areas of high deprivation is more effective in reducing problem gambling than simply removing machines.

- A cap on gaming machine numbers and an effective relocation policy that allows venues to move out of deprived areas into the CBD is much fairer to hospitality business owners, as well as helping to address problem gambling.

- If gaming venues are removed from the community, gamblers may move to the online environment where gambling is unregulated and unmonitored, has no harm minimisation measures, incentivises spending and returns nothing to the New Zealand community.

Community organisations rely on pub gaming to survive

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

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

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

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

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

Every year, the gaming trust sector raises around $294 million\(^2\) for more than 9,700 worthwhile sports and community groups. The sector’s contribution to the community through funding, in addition to the contribution to government revenue from GST, other taxes and levies, is acknowledged by central government.

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

**The pub gaming sector has experienced a significant decline**

During the last 18 years the pub gaming sector has experienced a significant decline. Department of Internal Affairs (DIA) statistics show that, between 30 June 2003 and 30 June 2020:

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

**Council policies contribute to the decline in the pub gaming sector**

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

Such policies are based on the erroneous belief that limiting gaming machine numbers will limit problem gambling. In fact, despite the 41% reduction in gaming machine numbers during the past 18 years, New Zealand’s problem gambling rate has remained consistently low at around 0.3% to 0.7% of the population. The 2015 New Zealand Gambling Study (the most recent) found the rate was 0.2% and the latest Health and Lifestyles Survey found it was 0.1%. The 2012 New Zealand Gambling Study concluded “...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006.”\(^5\)

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

\(^1\) Page iii, Community Funding Survey, Point Research 2012.
\(^2\) Grant Distribution Modelling, KPMG, November 2020.
\(^3\) DIA statistics: https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict
\(^4\) Ibid.
\(^5\) Page 7, New Zealand 2012 Gambling Study: Gambling harm and problem gambling.
**Online gambling is an unregulated threat**

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

During the Covid-19 lockdown in 2020, the Health Promotion Agency found that 8% of gamblers gambled online for the first time and an additional 12% gambled online more than usual.⁶

**Location of gaming machines is more important than their number**

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

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

**NZCT’s recommendations**

New Zealand Community Trust recommends Ōtorohanga District Council:

- adopt the proposed policy of a Controlled Increase in Venues
- include an explicit relocation provision to allow venue operators to relocate their businesses for their own reasons, as well as when forced to by circumstances beyond their control.

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⁶ Impact on Covid-19: Topline results, April 17 2020, Health Promotion Agency
⁷ Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland, Gambling & Addictions Research Centre, AUT University, 2012.
⁸ Section 97A and 102(5A).
Pub gaming’s vital support for the community

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

Research\(^9\) shows that the annual entertainment value from the pub gaming sector to recreational players is around $250 million. The government revenue in the form of tax, duties and levies is also substantial and was over $279 million in 2014.

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

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

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

\(^{9}\) Maximising the benefits to communities from New Zealand’s community gaming model, BERL, February 2013.

\(^{10}\) Grant Distribution Modelling, KPMG, November 2020.
NZCT’s revenue distribution in 2018/19

Note: We are not showing the 2019/20 figures because that was not a typical year, thanks to the Covid-19 lockdown which significantly affected our business.

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

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

In 2018/19, we funded the equivalent of:

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

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

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

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

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

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

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

Why allowing relocations is important

Helping reduce harm
Research\(^\text{11}\) by Auckland University of Technology shows that problem gambling behaviour is influenced more by the distance to the nearest gambling venue, rather than the number of gambling venues within walking distance.

The Ministry of Health’s 2013 Gambling Resource for Local Government acknowledges this point and states that one of the major factors associated with increased prevalence of problem gambling is "location and/or density of gambling venues and machines."\(^\text{12}\) The Ministry of Health also found "being a problem gambler is significantly associated with living closer to gambling venues."\(^\text{13}\)

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

Supporting local hospitality businesses
Relocation clauses help ensure the continual improvement and growth of your local hospitality sector. Rather than tying gaming operations to a physical address, which may over time become a less desirable location, relocations allow gaming operators to move their business to more suitable premises. This is particularly important if premises are deemed unsafe or unusable for a lengthy period, such as after a fire or earthquake. The result is attractive and safe entertainment environments in your community.

Responding to future demand
Broad relocation clauses help gambling venue policies accommodate urban growth, re-zoning changes or changes in population demographics. This is not possible while gambling machine entitlements are linked to a physical address.

The DIA recommended relocation policies as a way of allowing territorial authorities to future-proof their class 4 gambling policies.\(^\text{14}\)

Allowing appropriate benefit and responsibility
Gaming machine entitlements sit with the property at a physical address, yet property owners are not regulated under the Gambling Act. In effect, the property owner holds the power, but has no responsibility for the gambling operation, unless they are also the operator of the site.

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

\(^{11}\) Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland, Gambling & Addictions Research Centre, AUT University, 2012.
\(^{13}\) Ibid.
\(^{14}\) Internal Affairs Policy Briefing 3: Options for improving territorial authority gaming machine policies, 28 March 2013.
Parliament’s directive is being acknowledged by other councils
Of the many local authorities (see the table below) that have completed a gambling venue policy review since 2015, only six have not allowed relocations in their policy after considering a new or amended clause.

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

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<th>Council</th>
<th>Submissions made</th>
<th>Review result</th>
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</table>

**Reasons to maintain the current policy on gaming machines and venues**

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

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

**Community funding**
Around $294 million is returned to the community every year through grants awarded by class 4 gaming societies. Many community organisations, such as sports clubs, hospices, rescue services and arts groups, would struggle or cease to function without this funding. There is currently no sustainable alternative to this funding to the level provided by gaming societies.
Class 4 gaming societies have probity processes we go through with every grant application to ensure the applicant is authentic and able to deliver the outcomes detailed in their grant application, and that any goods or services to be paid for by the grant are at arm’s length and free from any conflicts of interest.

**Difference between pub gaming societies, and clubs and New Zealand Racing Board**
The pub gaming model differs from the gaming run at clubs like RSAs and in New Zealand Racing Board (now known as RITA) venues. Those entities can apply the funds they raise to their own purposes, for example, maintaining clubrooms or funding race meetings. In its 2020 annual report, RITA advised its distributions totalled $152.3 million, only $2 million of which went to community sports organisations; the rest went to the racing industry. In contrast, class 4 societies like NZCT distribute all net proceeds to the community.

**Gaming machine numbers have little effect on problem gambling numbers**
It is naïve, misleading and wrong to assume that fewer gaming machines will result in fewer problem gamblers. A gambling addiction is a complex psychological condition, which is influenced by many factors and usually has co-morbidities, such as mental health issues and other addictions. As shown in the graph below, a reduction of almost 6,000 gaming machines across the country between 2007 and 2019 had no impact on the small percentage of problem gamblers nationally.

![Graph showing gaming machine numbers versus prevalence of problem gambling in New Zealand](image)

Note: In the 2006/07 Ministry of Health NZ Health Survey, 0.4% of the population were categorised as problem gamblers using the Problem Gambling Severity Index (PGSI). In the 2010 Health and Lifestyles Survey, the rate increased to 0.7%. In the preliminary findings from the 2012 New Zealand Health Survey, the rate was 0.3% of the population, but the 2012 New Zealand Gambling Study found the rate was 0.7% of people aged 18 years and over. The 2015 wave of the New Zealand Gambling Study found the rate was 0.2% and the 2016 Health and Lifestyles Survey found it was 0.1%.

**Gaming machines are a legal and valid entertainment choice**
Pub gaming is a legal, valid and enjoyable source of entertainment for Ōtorohanga residents and tourists alike. Most players regard gaming as light entertainment and know when to stop. The Gambling Commission has reminded councils and the regulator that “… conditions can only properly
be imposed if they reduce the harm caused by problem gambling, as distinct from simply reducing gambling activity which is a lawful and permitted activity under the Act."  

We recognise that Ōtorohanga District Council aims, through its Long-term Plan, to balance the needs of visitors and residents while achieving economic development. We support this objective and believe a vibrant hospitality sector is a vital part of achieving this outcome.

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

**Problem gambling rates have plateaued**

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

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

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

It also states that the current problem gambling rate has now dropped to an all-time low of 0.1% of the adult population (around 7,500 people), despite an upward trend in gaming machine expenditure. ‘Expenditure’ as measured by the Department of Internal Affairs, however, does not take account of inflation, population growth and other economic factors; expenditure on gaming machines is declining when adjusted for these.

**Problem gambling rates in New Zealand are relatively low**

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

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15 Gambling Commission decision GC 03/07.
16 Maximising the benefits to communities from New Zealand’s Community Gaming Model, BERL, February 2013.
17 Pg 8, NZ 2012 National Gambling Study: Overview and gambling participation.
18 Pg 18, ibid.
20 Maximising the benefits to communities from New Zealand’s community gaming model, BERL, February 2013.
<table>
<thead>
<tr>
<th>Country</th>
<th>Problem gambling prevalence (% population*)</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Zealand</td>
<td>0.1–0.2</td>
</tr>
<tr>
<td>UK</td>
<td>0.7</td>
</tr>
<tr>
<td>Norway</td>
<td>0.7</td>
</tr>
<tr>
<td>Australia</td>
<td>2.3</td>
</tr>
<tr>
<td>USA</td>
<td>2.6</td>
</tr>
<tr>
<td>Canada</td>
<td>3</td>
</tr>
</tbody>
</table>

* Mixture of CPGI, PGSI and SOGS scores

**Gaming machines can only be played in strictly controlled environments**

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

The DIA is responsible for monitoring the class 4 gambling industry, including venue ‘key persons’, bar staff and societies, to ensure they adhere to legislative requirements. The penalties for non-compliance include fines, suspensions, loss of operating or venue licence and potential criminal charges.

**Strict harm minimisation obligations**

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

- stake and prize money are limited
- odds of winning must be displayed
- gaming rooms are restricted to people over the age of 18 years
- gaming rooms can only be operated in adult environments, such as pubs, nightclubs and clubs
- play is interrupted every 30 minutes with an update on how long the player has been at the machine, how much money they’ve spent, and their net wins and losses
- $50 and $100 notes are not accepted
- no ATMs are allowed in licensed gambling areas
- gaming advertising is prohibited
- the DIA monitors every gaming machine’s takings
- syndicated play is prohibited
- all venues must have staff trained in gambling harm minimisation on duty whenever gaming machines are operating
- all venues must have a gambling harm minimisation policy in place
- all venues must display pamphlets and signs directing gamblers to help services
- venue staff must be able to issue and enforce Exclusion Orders
- venue staff must help problem gamblers if they have an ongoing concern about them.

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21 A range of different measurements are available to measure problem gambling rates. CPGI refers to the Canadian Problem Gambling Index, PGSI is the Problem Gambling Severity Index and SOGS is the South Oaks Gambling Screen.
Harm minimisation activities
Gaming trusts take legal obligations very seriously, none more so than those around minimising the harm that can be caused by gambling. To meet our harm prevention and minimisation requirements, NZCT provides a problem gambling resource kit to each of its gaming venues. The kit includes:

- NZCT’s Harm Prevention and Minimisation Policy
- A plain language harm prevention and minimisation manual and policy guide
- Exclusion orders and guidance on the exclusion order process
- A pad of gambling host responsibility record sheets to record any problem gambling issues and action taken by staff
- Signage, pamphlets and other problem gambling resources.

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

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

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

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

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

Support is available for problem gamblers
Each year the gambling industry pays $20 million to the government in the form of a problem gambling levy, so the Ministry of Health can implement its Preventing and Minimising Gambling Harm Strategic Plan (PMGH). These funds pay for the implementation of public health services, intervention services, research, evaluation and workforce development.
Two of the findings from the inaugural PMGH baseline report were that problem gambling services are effectively raising awareness about the harm from gambling, and interventions for gambling-related harm are moderately accessible, highly responsive and moderate to highly effective.\textsuperscript{22}

The world’s largest clinical trial\textsuperscript{23} for problem gambling treatment found that, one year after calling the Gambling Helpline, three-quarters of callers had quit or significantly reduced their gambling.

\textsuperscript{22} Page 16, Outcomes Framework for Preventing and Minimising Gambling Harm Baseline Report, May 2013.
\textsuperscript{23} The Effectiveness of Problem Gambling Brief Telephone Interventions, AUT, Gambling & Addictions Research Centre.
Further information about our submission

For further information, or if you have any questions about NZCT’s submission, contact Tanya Piejus, Communications Manager on (04) 495 1594 or tanya.piejus@nzct.org.nz.
Appendix 1: About NZCT

Established in 1998, NZCT is New Zealand’s largest gaming trust with 15% market share. Our publicans raise funds by operating gaming lounges within their pubs, hotels and other venues. In the 12 months to 30 September 2020, NZCT approved $29.4 million in grant funding to sporting, local government and community groups nationwide.

We have twin goals of serving both our publicans and the communities in which they operate. At least 75% of the funds we distribute are directed towards sports activities, making NZCT the largest funder of amateur sports participation in New Zealand. We focus on sport because of the many positive benefits it offers communities, such as:

- crime reduction and community safety
- economic impact and regeneration of local communities
- education and lifelong learning
- participation
- physical fitness and health
- psychological health and wellbeing
- social capital and cohesion.\(^\text{24}\)

Overseas research\(^\text{25}\) has found participation in sport can lead to increased health and productivity for individuals, and increased wealth or wellbeing of society as a whole. While amateur sport is our main focus, we are also strong supporters of other worthy community activities, including local government projects.

Who we are

We are proud of our robust grants system and of the quality of people involved with NZCT. All our trustees\(^\text{26}\) are highly regarded business and community leaders with extensive governance experience. They are supported by an experienced staff and 10 Regional Advisory Committees (RACs) who add local knowledge and insight to our grant decisions.

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\(^{24}\) Sport England’s Value of Sport Monitor.


\(^{26}\) Alan Isaac (NZCT chairman, professional director and sports administrator), Peter Dale (former Hillary Commission chief executive), David Pilkington (professional director), Kerry Prendergast (former mayor of Wellington) and Lesley Murdoch (Olympian and former New Zealand cricket captain, broadcaster).
Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

★ It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
★ If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter/s Details

Full Name: Hospitality NZ - Waikato Branch
Contact Person: Melissa Renwick
Email Address: melissa@hospitality.org.nz
Phone Number/s: 0275072771 (Daytime) 0275072771 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☐ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Please see letter attached.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them

Signed Melissa Penwick
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 01 April 2021

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

Privacy Statement

All submissions (including the name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of this policy review process and hearing. All information collected will be held at Ōtorohanga District Council, 17 Maniapoto Street, Ōtorohanga with Submitters having the right to access and correct personal information.
31 March 2021

Via email: claire@otodc.govt.nz

RE: Class 4 Gambling Venue Policy

Tenā koe,

Hospitality New Zealand (Hospitality NZ) is a member-led, not-for-profit organisation representing over 3,000 businesses, ranging across cafés, restaurants, bars, nightclubs, commercial accommodation, country hotels, and off-licences. We have a 119-year history of advocating on behalf of the hospitality and tourism sector.

Prior to COVID, the hospitality sector, which includes accommodation and food service operations, consists of around 22,800 enterprises in just under 24,400 geographic locations around the country. Collectively these enterprises employ just under 173,000 people.

Hospitality NZ welcomes the opportunity to submit on Class 4 Gambling Venue Policy Review 2020.

This letter supports your proposed changes to the Class 4 Gambling Venue Policy from a 'Sinking Lid' to a 'Controlled Increase in Venues'. Moreover, we applaud the council for having a wider view of business growth and opportunities within its region.

We note your comments in the proposed new policy;

"any person/s or organization wishing to establish a new Class 4 Gambling Venue in the Ōtorohanga District will be required to obtain the consent of the Council prior to making application for a licence from the DIA. Consent for the establishment of a new Class 4 Gambling Venue will be subject to case-by-case consideration at the discretion of Council."

We support this approach and agree that each application should be reviewed independently.

We would like to note that Hospitality NZ is currently rolling out Harm Minimisation Leadership programme has been created specifically for business owners and venue managers. It has been designed and written by key industry stakeholders including experienced operators, gaming trusts and legal experts and is considered best practice for gaming venues.

The leadership programme will not only give owners and operators the tools necessary to design and implement effective harm minimisation policies and procedures in their venues, but it will also support them to increase customer care and revenue.
It is important for us to highlight that the measures we are taking as an industry operating in this sector, we are forward thinking and are very pleased to see that councils are beginning to appreciate that with the right training and controls, the sector can be a valuable addition to the business community and of course, through the operating trusts, the community as a whole.

Thank you for the opportunity to submit on Class 4 Gambling Venue Policy Review 2020. Please do not hesitate to contact us if you have any further questions.

Ngā mihi nui,

[Signature]

Melissa Renwick  
Regional Manager  
Hospitality New Zealand
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EXECUTIVE SUMMARY

PGF Group advocates that Ōtorohanga District Council maintain a sinking lid policy. The Ōtorohanga District has a significant spend on pokies and this is a public health issue in your area. PGF Group is very concerned that a change from the sinking lid policy to a “Controlled Increase in Venues” policy is a backwards step for the District. Electronic Gaming Machines (EGMs) or ‘pokies’ that are in pubs, clubs and TABs are the most harmful form of gambling in New Zealand (Appendix 2), and although PGF Group advocates for sinking lid policies, we believe even this policy does not go far enough to minimise the harm from gambling in our communities.

Nationally, we continue to have 50% of pokies in our most deprived communities; 30-60% of the money being lost on pokies by problem gamblers, and a national spend that has been trending upward since 2014.

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

Information provided to the Council policy analyst may have included a risk assessment tool to enable an evaluation of gambling harm in Ōtorohanga, 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 area.

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 ŌTOROHANGA

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 year 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 Ōtorohanga’s gambling venue locations are included as Appendix 4.

Gambling in Ōtorohanga

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

• 2 gambling venues hosting 23 pokies.
• Both venues are located in very high deprivation areas. See Appendix 4.
• $977,122.43 was lost to pokies in Ōtorohanga in 2019; $2,677 a day; each pokie machine making an average of $42,484 during this period.

Gambling, the cost of living, and threshold of harm

The median income in Ōtorohanga is $26,700 per annum, $5,100 less than the national median. This is a weekly income of $513. The median rental is $240 per week so the remaining $273(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”.

Commercial implications

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

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

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

Class 4 pokies are a significant spend for deprived households.

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

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

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

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

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

The purpose of the Gambling Act is to:

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

Sinking lid policies

PGF Group submits that Ōtorohanga District Council keep the sinking lid policy and strengthen it with a clause that states no relocations of class 4 machines are allowed, and no club mergers are permitted. This is the best policy to control the growth of gambling and minimise harm.

PGF Group opposes the Ōtorohanga District Council’s proposal to move away from the sinking lid policy on pokie machines. As you know, the purpose of a sinking lid policy is to reduce, over time, and with harm reduction in mind, the number of machines operating within a specific area.

Council has cited “an increased opportunity for business growth in the Ōtorohanga District” as a reason for the "Controlled Increase in Venues" policy. Venues are however, restricted from growing their business with class 4 gambling machines.

The Gambling (Venue Payments) Regulations 2016 restrict payments made to venues and state that:  

A corporate society must not, in respect of a week at a particular venue, pay to a venue operator, payment that in total exceeds 1.28% of the week’s turnover.

In addition to the legislation that prevents venues from profiting from pokie machines (as a harmful product), the Sale and Supply of Alcohol Act 2012 does not allow venues to receive their primary income from gambling.

For the economic effects of Class 4 Gambling please refer to a recently commissioned report published by the New Zealand Institute of Economic Research which found that:  

- The cost to retail industry sales of Class 4 gambling is estimated to be $445 million for 2018/19.
- The increased retail sales would generate an additional 1,127 full-time equivalent jobs for 1,724 workers, worth approximately $50 million in wages and salaries.
- These additional jobs and workers would be concentrated in the food and beverage services, specialised food retailing, and supermarkets and grocery stores.
- The additional GST revenue expected is estimated to be $58.01 million, with the biggest shares coming from sales in the motor vehicle and parts retail sector (consistent with transport being a major expenditure category for households) and supermarkets and grocery stores.
- Income tax collected from additional retail sector workers is expected to be between $7 million and $7.6 million. The greatest contributor to this amount is expected to be the food and beverage sales
industry, followed by specialised food retailing, and supermarket and grocery store workers. For a full cost-benefit analysis, these effects would have to be balanced against the losses.

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 clubs are permitted to merge their class 4 machines. Allowing mergers enables the maintenance of existing numbers and risks creating ‘pokie dens’ in clubs. Research supports the argument that increased numbers of pokie machines leads to increased problem gambling prevalence.\(^8\)

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 three provisions:

- **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.

- **No relocations**: If a venue with pokie machines is forced to close or voluntarily closes, the council will not permit the pokies to be relocated to any venue within the council area.

- **No club mergers**: There will be no merging of club pokies under any circumstances.

PGF recommends these provisions:

1. Restrictions on venue and machine consents:
   
   (i) The Council will not grant consent for the establishment of any additional Class 4 venues or additional gaming machines under this policy.

   (ii) Venue relocation is prohibited. A gambling venue consent is for one venue (one premises) and is not transferable to another venue. The consent is given to a venue at a given address, not to a person or business. To remove doubt, if a corporate society proposes to change to a new venue, a new consent is required under s 98 (c) of the Gambling Act 2003 and clause (i) of this policy applies.

   (iii) Club mergers are prohibited. Once a venue or club ceases to operate, the machine numbers will not be allocated to any new or existing venue or club.

   (iv) Council will not provide consent under Sections 95(1)(f) or 96(1)(e) of the Gambling Act 2003 to any application by corporate societies with Class 4 licences seeking Ministerial discretion to increase the number of gaming machines permitted at a venue.

PGF recommends that the Ōtorohanga District Council include Best Practice Guidelines with the policy and encourages council to undertake a duty of care in monitoring venues. An example of these can be found in the Invercargill City Council Gambling Policy.
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.9 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 suicidality10 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.11

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.12

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.13

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%)14

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.15
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.16

Studies of problem gambling and links to criminal activity suggest that much of the related crime goes unreported.17 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.18

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”.19 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.20

### 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.21

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.22 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.23

In addition, more recent research has been conducted and is outlined in the section above-entitled Commercial implications.

### 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.24

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.25

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).

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.
Vulnerability

Factors contributing to being a risky gambler include ethnicity, deprivation, major life events, psychological distress, cannabis use and various gambling behaviours.\(^28\)

- 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.*\(^29\)

- Māori populations comprise 31% of intervention service clients\(^30\), but make up only 15% of the population.\(^31\)

- 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.\(^32\)

- Pacific populations comprise 21.2% of intervention service clients\(^33\), but make up only 7% of the population.\(^34\)

- Problem gambling strongly linked to mental health state and disorders.\(^35\)

- Many problem gamblers also use tobacco, alcohol and other drugs.\(^36\)
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 fundraising 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)).

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. These include the fixed amounts towards gambling duty and the problem gambling levy.

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.

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.
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.42

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:

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

- 56.4% had nicotine dependence
- 18.2% alcohol abuse
- 15.2% alcohol dependence
- 11.5% cannabis use disorder43

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%)44. 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.45 People who are already socially and economically disadvantaged are most susceptible to gambling problems.46

The revenue generated by gambling within a community is often spent in a more affluent community.47 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).48 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.49

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 on overseas websites has remained stable at around 2% since 2010.50 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 retaining the 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.
Appendix 1. Measure of gambling-related harm


Appendix 2. Clients assisted by primary gambling mode


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

48.3% of presentations to gambling services cite non-casino pokies as the primary mode of harmful gambling

10.7% of presentations to gambling services cite casino pokies as the primary mode
Appendix 3. Gambling expenditure statistics


Appendix 4. Deprivation of gambling venue locations in Ōtorohanga


Appendix 5. Ōtorohanga annual spend vs machine numbers 2015-2019

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...
13 As above.
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.

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).


As above.


As above


Ends.
Submission

Otorohanga District Council Class 4 Venues Gambling Policy Review

To: Gambling Venue Policy
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Otorohanga 3940
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Details of submitter: Public Health Unit
Waikato District Health Board

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Hearing: Waikato DHB wishes to verbally support its submission

Date: 29 March 2021

Introduction

1. Waikato District Health Board (Waikato DHB) presents this submission through its Public Health Unit. Regarding matters concerning public health, the Public Health Unit is the principal source of advice within Waikato DHB. Under the New Zealand Public Health and Disability Act 2000, Waikato DHB has responsibility to improve, promote and protect the health of people and communities. Additionally, there is a responsibility to promote the reduction of adverse social and environmental effects on the health of people and communities. With approximately 7,200 staff, Waikato DHB delivers health services to a population of more than 400,000 people across the Waikato region, and tertiary-level services to the midland region with a population of over 840,000.

2. Waikato DHB and Public Health appreciates the opportunity to provide comment on council’s proposed direction for class 4 gambling.
Submission and Recommendations

- Waikato Public Health and Waikato DHB supports the current Sinking Lid Policy and opposes the proposed ‘controlled increase in venues’ policy approach for the Otorohanga district.

- Waikato Public Health and Waikato DHB opposes any opportunity for class 4 venues to either merge or relocate.

- In its decision, our organisation urges Council to show leadership and consider the range of complex health and social issues affecting the quality of life of those impacted directly and indirectly by gambling, including the broader impacts on the community.

Waikato DHB’s position on gambling

3. Waikato DHB has a strong position on gambling policy, advocating that the adverse impacts of gambling far outweigh the benefits. Our organisation has been most active in class 4 venue gambling policy at the local government level where we continue to advocate for a true sinking lid policy approach and oppose all opportunities for class 4 venues to either relocate or merge.

4. Waikato DHB has a strategic imperative to achieve radical improvement in Māori health outcomes by eliminating health inequities for Māori. Māori are over represented with respect to problem gambling and experience disproportionate levels of gambling harm; 6.2% of Māori adults are problem or moderate-risk gamblers compared with prevalence for the total New Zealand population of 2.5%.

5. It is also important to note the link between socioeconomic deprivation and gambling harm and recognise the impact for both Māori and Pacific peoples who disproportionately reside in these areas.

6. As a health organisation, we are concerned at all levels of harm resulting from participation in class 4 gambling; from relationship breakdown and bills remaining unpaid to increased stress and anxiety in children, crime and fraud.

7. Our advocacy position is to raise awareness of the connections between health and gambling harm to ensure health remains a mainstream consideration in decision making at the population-health level. Our submission is presented to you from this perspective.

Key information

8. Waikato DHB and Public Health is concerned at the proposed direction to grow gambling opportunity across the district by way of a ‘controlled increase in venues’ policy. Introducing an increase in venues and associated increase in electronic gaming machines across the district will almost certainly lead to increases in harm to individuals, families, and the community through increased participation in gambling activity and corresponding spend.

9. The Gambling Act 2003 classifies gambling based on the amount of money spent and the risk of problem gambling associated with an activity. Classes of gambling range from Class 1 which is classified as low-stake low-risk gambling such as an
office sweepstake, through to class 4 which is classified as high-risk high-turnover gambling. *Pokies* are class 4 classified as high-risk high-turnover gambling.

10. Since class 4 gambling legislation, there has been a stronger reliance on gambling funds to support community and sport activities. The argument often used to maintain the status quo is that communities may lose out on valuable funds if the numbers of gaming machines and venues were to continue to fall. Community capability in using more traditional fundraising methods and/or developing innovative ways to raise funds is often undermined alongside this reliance on gambling funding.

11. In Otorohanga for example, the Gross Machine Proceeds (GMP) for the district in the past two and a half years (January 2018 to June 2020) was more than $3 million. In this same two and a half year period about $162,674 was returned to the community. This represents a return to the community of only 5.2%.

12. A significant amount of gambling proceeds are coming from those who can ill afford it.

**Gambling related harm**

13. Increasing the number of venues and associated electronic gaming machines, conflicts at a fundamental level with the Purposes of the Gambling Act 2003; and in particular s3(b) prevent and minimise harm from gambling, including problem gambling.

14. Gaming machines are recognised nationally and internationally as being the major cause of gambling harm and the main gambling mode of people seeking help. Approximately 60% of clients who have received help from problem gambling treatment services identify gaming machines as their main gambling mode. Gaming machines have been described as the ‘crack cocaine of gambling’ largely because gambling can and does occur in a continuous and prolonged manner.

15. Participation in frequent continuous gambling is concerning from a public health perspective, because this form of gambling is most closely associated with problem gambling.

16. Research indicates that each new gaming machine is associated with an increase of problem gambling by nearly one additional person.

17. While the Waikato DHB recognises that most people in New Zealand do not experience harm from participation in a gambling activity, a significant minority of people gamble in a way that puts them and their families/whānau and friends at risk of harm.

18. The New Zealand National Gambling Study 2015 indicates that two percent of the adult population were either problem or moderate-risk gamblers, and 4.6% were low-risk gamblers (experiencing some level of harm or negative consequences from their gambling). One in five New Zealand adults (22%) has been affected at some time by their own or the gambling of others. Six percent (214,000 New Zealand adults) reported at least one form of household-level harm such as going without something they needed or bills not being paid because of the money spent
on gambling. Māori and those living in high deprivation areas are more negatively impacted by the gambling of others.\textsuperscript{13}

19. A public health approach considers the burden of harm across the continuum and not just on the individual gambler. For example, harm at the individual and family/whānau level includes emotional and psychological stress, financial harm such as increased credit card debt, reduced performance at work or education, relationship conflict, disruption and breakdown and criminal activity.\textsuperscript{12}

20. Of particular concern, are the multiple forms of harm experienced by children under the care of those experiencing problems with gambling. Harm can include neglect; staying up late; losing sleep; missing school; being hungry; eating more take away or convenience foods, and potential vulnerability to abuse through lack of supervision.\textsuperscript{14}

21. Gambling harm at the community level can impact directly through crime and disorder; and indirectly through the costs that gambling affected households impose on the community. For example, a higher density of gaming machines was associated with a higher number of food parcels given out by the Salvation Army.\textsuperscript{15}

22. Low-risk gamblers contribute more to the total harm in the community despite being harmed less per person than problem gamblers.\textsuperscript{12} This is because of the greater number of low risk gamblers in New Zealand. The total burden of gambling harm to New Zealand communities was greater than common health conditions like diabetes and arthritis and was approaching the level of anxiety and depressive orders.\textsuperscript{12}

\textbf{Summary}

In summary, Otorohanga District Council is to be congratulated for its effective class 4 venues gambling policy to date. The district is planning for further growth which will not be enhanced with additional opportunities to gamble. Our organisation supports council to show leadership and maintain the current sinking lid policy.

Dr Richard Wall

Medical Officer of Health
References

5 Department of Internal Affairs. Gaming Machine Proceeds by District and Society Type.
6 Problem Gambling Foundation Group. Electronic Gaming Machine Grant Funding Report for Otorohanga District Council
7 The Gambling Act 2003
INTRODUCTION

1. We thank the Ōtorohanga District Council for the opportunity to submit on the upcoming Class 4 Policy.

2. Hāpai Te Hauora Tāpui Ltd (Hāpai) is the largest Māori Public Health organisation in Aotearoa. We are a kaupapa Māori Organisation, and are national leaders in population health, health promotion and education, policy, advocacy, research & evaluation, and infrastructure services. We support Māori whānau, hapū and iwi to play a role in decision-making on matters affecting their health and well-being.

3. Established as a tripartite agreement between Te Runanga o Ngāti Whātua, Raukura Hauora o Tainui and Te Whānau o Waipareira. In matters of Māori Public Health, Hāpai are the representative Māori Public Health body for two of the largest Iwi who hold mana whenua over Tāmaki Makaurau (Collectively with a number of other affiliate Iwi and Hapū), as well as one of the largest urban Māori Organisations in Tāmaki Makaurau.

4. Hāpai te Hauora (Hāpai) have a long-standing history in the provision of gambling service, by virtue of our contracting agreement with the Ministry of Health. Hāpai Te Hauora holds regional and national gambling service contracts, which focus on supporting gambling harm prevention and minimisation. Our mahi addresses both proximal and distal causes of gambling harm, from empowering thriving communities, developing community policy to safeguard communities against gambling harm and facilitating community awareness of gambling related harm as a primary prevention mechanism through to supporting safe gambling venues and availability of brief intervention screening.

5. Given our whakapapa (heritage), Hāpai continuously operates under a collective impact model alongside our owner organisations, through the Whānau Whānui framework which ensures that we are constantly and consistently aligning Public Health evidence, with the expertise of communities lived experiences, in order to enhance Māori well-being.

6. Hāpai operates from the philosophy of “Oranga Tangata, Oranga Whenua” as the simulative epitome of Te Āo Māori in practice. This speaks to the inextricable connectedness of humanity to the...
environment in all of its facets. “Oranga Tangata, Oranga Whenua” highlights the critical interdependence that Māori people have with their environment, reflected not only in its physical manifestations of land and water, but also in human and esoteric capitals.

7. As an organisation, Hāpai is committed to realising the health and well-being potential of Māori communities through working towards equitable health outcomes for whānau, hapū, iwi and hāpōri. We affirm that to achieve this, the impacts of broader social determinants of health need to be resourced equitably and made a political priority.

**BACKGROUND AND CONTEXT**

8. We recognise the upstream, macro level determinants of health that impact the everyday lives of New Zealanders. This echoes the empirical evidence provided by Te Āo Māori worldviews, and reiterates the need for comprehensive and cohesive cross-sector approaches to provide a socially, culturally, environmentally and economically responsive system.

9. In bringing an indigenously Māori perspective to the issue of gambling harm, it is important to note that Pre-colonial Māori society had no history of gambling, and until recently there was no word for ‘gambling’ in Te Reo Māori.

10. However, our participation in gambling harm minimisation is preceded by the impacts of gambling harm experienced in Māori communities through generations of colonisation, where gambling must now be understood as an activity which is embedded within multiple social, cultural, and economic contexts, with these all impacting on actions and outcomes for individuals and their whānau.

11. In 2021, New Zealand Māori make up some of the most damning statistics in gambling activities in Aotearoa New Zealand. Māori are at minimum, five times more likely to develop problem gambling behaviours than the general population, with more than a third of those engaged in gambling treatment services being Māori – this being an over-account given the incredible silence of gambling harm sufferance. One in four Māori are likely to be affected by gambling harm. This harm extends well beyond the individual gambler to their immediate and wider whānau, who often bear the brunt of gambling harm.

12. Māori experience disproportionate levels of gambling harm. Negative gambling outcomes include poverty, absolute poverty, alcohol and drug abuse, unemployment, relationship break down and

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fraud. It is essential to recognise that the destructive and cumulative harm the aforementioned determinants are inequitably distribute on Māori populations, that is whānau, hapū and iwi Māori.

13. The over-saturation of gambling venues within Māori and Pacific communities, many of whom also represent the lowest decile communities in NZ, is extremely concerning. Availability of pokie machines in these communities has been directly correlated with gambling harm. Despite this fact, pokie venues maintain high numbers and/or high expenditure in our most vulnerable communities. The proliferation of online gambling only adds further complexities to the attempts to minimise gambling harm.

14. This over representation of availability and accessibility to gambling environments so proximal to whānau, expressively influences their ability to partake in harmful gambling activity. While gambling as an activity presents limited immediate ‘physical’ threats to individuals, it is the environment that is created around those who gamble operating in often complete disconnect from external ques and support structures that causes the practise to be so devastating to whanau and communities. It can be fairly stated that the greatest loss’ is connection and participation within supportive whanau networks.

RECOMMENDATIONS

15. We implore the Ōtorohanga District Council to revoke its proposed policy, and to instead opt for some minor amendments to the 2010 policy. As Public Health experts, Hāpai see this as the only viable way forward.

16. Hāpai holds a firm opposition to the proposal outlined in the proposed policy change. We oppose controlled increase in venues policy, on the basis that such a policy is negligent. It fails to meet the minimum standard of the gambling act and perpetuates harm upon our most vulnerable communities. The proposed ‘controlled increase in venues policy’ signifies Ōtorohanga District’s dependence on gambling to promote business growth and gambling proceeds. The proposed policy prioritises businesses before health of the Ōtorohanga District.

17. Hāpai further make a number of recommendations which aim to advocate against the Ōtorohanga Class 4 proposed policy, to safeguard the wellbeing of our most vulnerable communities in the Ōtorohanga District.

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2 Ministry of Health. (2008). Raising the Odds? Gambling behaviour and neighbourhood access to gambling venues in New Zealand
18. The proposed policy is not upholding the minimum requirements of The Gambling Act 2003. The proposed policy fails to fulfil the purposes of preventing and minimising gambling harm, facilitating responsible gambling, and limiting opportunities for crime and dishonestly associated with gambling.

19. A controlled growth model will perpetuate the burden of gambling harm upon vulnerable populations. Hāpai holds that the proposed Policy fails to strike an appropriate balance between permitting responsible gambling, and minimising harm to the community. The growth in venues proposed is a misinterpretation of the purposes of The Gambling Act (2003). The proposed removal of the ‘Sinking Lid Policy’ to shift to a Controlled Increase in Venues’ does not safeguard the wellbeing of the community. Increased venues lead to increased gambling harm. 30% of all class 4 pokies expenditure come from moderate to severe risk gamblers in the Ōtorohanga district; the district will be additionally burdened if the increasing of venues is permitted.

20. Hāpai fails to identify the elements of the proposed policy that will secure and safeguard a ‘controlled’ increase in venues. The proposed policy places ‘controlled growth’ at the discretion of the council. Hāpai hold further concerns that the council of the Ōtorohanga District lack the contextual and applicable capabilities within both a public health and economic growth framework to be able to neutrally assess the appropriateness of new gambling venue applicants, as they are not educated in gambling harm prevention and minimisation.

21. Since 2010, the number of Class 4 venues in the Ōtorohanga District have reduced from 4 venues to two venues. Whilst this is a small number of venues, this is not reflected in the harm that Hāpai has seen in the form of whānau seeking support for gambling harm. The remaining two venues, and their machines still populate the most deprived areas of the Ōtorohanga District. Sinking lid policies reduce community exposure to gambling, and reduce accessibility.

22. As at February 2020, there were approximately 1,080 community venues in Aotearoa New Zealand with 14,856 gaming machines. These Gambling venues are disproportionately saturated within lower socioeconomic areas, with Māori populations highly concentrated in these areas, and equally, these communities are not represented in the funding which is returned to the community.

23. The proposed ‘Controlled Increase in Venues’ policy seeks to enhance the inequities that currently exist across New Zealand and perpetuate gambling harm. A Public Health harm minimisation approach to gambling has been established in the Ōtorohanga district, and has been an effective measure in reducing gambling harm in the area by reducing access and availability of pokie machines. The Ōtorohanga District has a legislative obligation under The Gambling Act (2003) to reduce gambling
harmful harms, and thus, have an obligation to ensure that effective approaches such as the sinking lid policies are not removed in favour of singular economic benefits.

24. Increase in Gambling venues with no regard for the socio-political context of this growth has the potential to increase harm at catastrophic rates. We know that gaming machine placement, and therefore density, does not disproportionately affect vulnerable communities by chance. Gambling venues are more likely to be located within a community on the basis of low community agency, poorer community access to democratic processes and industry choice of where more profit will be accumulated. Gambling machines, environments and gameplay are designed to be addictive. At base level their offer of entertainment provides minimal immediate gratification as the process itself depends on losing something with the ‘chance’ of gaining more.

25. Allowing more Class 4 venues to open in the Ōtorohanga District will increase the financial losses of the community to pokies. An increase in the number of venues will undoubtedly increase the gambling expenditure for the Otorohanga district, with no guarantee of an increase in community level funding for those who need it, or even a guarantee of investment into the Otorohanga District, given the failures of the pokies funding model.

26. Such an increase in venues or machine density won’t translate to a moving economy or growth in community investment, and will likely result in a multiplicity of gambling harms that will exacerbate themselves upon whānau. This is exemplified through the grants returned in 2019. Losses to Class 4 pokie machines in the Ōtorohanga District in 2019 totalled $997,000, while only $100,000 was returned through grants to the community.

27. The Ōtorohanga District is a high deprivation area, with an average deprivation score of 9 (10 being most deprived). People in these areas can least afford financial losses from gambling. Increasing accessibility to Class 4 venues will not see a proportional gain in grants returned to the community.

28. Hāpai see the gambling harm minimisation agenda, and its application to communities as clear and concise. Hāpai advocates for a divestment of funds from harmful avenues into supportive communities.

29. Hāpai also hold the position that the Gambling Act is both outdated and impractical in the current environment of gambling and the swing of this pendulum between safe entertainment and gambling
harm. Ultimately, Hāpai hopes to see thriving communities who are not dependent on the proceeds of harm for their whānau and communities to prosper.

**CLAUSE FEEDBACK**

30. Hāpai has concerns with the priorities of this policy. The Gambling Act (2003) is flawed, as it does not go far enough to ensure communities are protected from gambling harms. Hāpai insists that the council should look for ways to apply the act in ways that do not increase gambling harm, insofar of the minimum requirements of the act. It is alarming that ensuring the accessibility and availability of gambling has been stated as a priority of the policy in Clause 1 section b. This is in conflict with Clause 1 section d, which aims to encourage responsible gambling practices. The Gambling Act 2003 aims to minimise gambling harm; promoting the availability of Class 4 venues actively disregarding the purpose of the Act and the legislative requirements.

31. We object to any policy that aims to increase the number of Class 4 venues or pokie machines as proposed in Clause 1 c. Due to the demography of the district, it is more at risk of gambling harm. Kāwhia has a high Māori population, which was 48.6% as of the 2018 census. This is much higher than the general population of New Zealand. Māori are at minimum, five times more likely to develop problem gambling behaviours than the general population. We are concerned with the lack of accountability to the demography of the district in the proposed policy.

32. The Clause 2, section a iii, provides the definition of ‘unfit’ as defined under Section 4 of the Gambling (Gambling Harm Reduction) Regulations 2004. We believe defining what is unfit can be specified further as to ensure greater protection for the people of Ōtorohanga District. Determination of whether a venue is fit for hosting Class 4 pokies is up to the discretion of the council, and thus this process is not a robust enough policy to protect vulnerable communities. We go further to say that the intention of Ōtorohanga District Council should not be to implement gambling harm minimisation policy insofar as it meets the legislative requirements of The Gambling (Gambling Harm Reduction) Regulations 2004, but should go further and work towards safeguarding community wellbeing through more stringent, public health responses.

33. Hāpai strongly advocates for the continued prohibition of merging venues, as this counters the intent of the policies instituted by the Council. We oppose the merging of venues as stated in Clause 2 section b ii, Hāpai recommends that pokies are to come out of service when a club relocates rather than there be an increased availability of pokies at the merged location.
34. We support the inclusion of a proximity clause outlined in section 4. However, the 100 meter boundaries proposed to surround sensitive locations are concerning. This distance is not far enough to ensure reduced exposure to gambling; this distance needs to be lengthened to act as a protection measure. We fear this is not safe enough distance from schools to protect children from exposure to gambling when walking to and from schools.

35. Hē pai does not support Clause 5, particularly referencing to section 5 x, and 5 xi. In Section 5 x, does not include any protective measures to ensure equitable distributions of the fund collected through pokie use. As Māori contribute to funds collected through pokies at a higher rate, an equitable response would ensure these are the populations who should be accessing the returns.

36. Clause 5 xi requires documentation outlining the policies in place for Harm Minimisation and Problem Gambler Identification. Historically, we have seen this manifest in self-regulated host responsibilities that provide minimal protection for people engaging with pokies.

**CONCLUSION**

37. We thank you for your consideration in requesting feedback to your Policy. In future, please advise us of any other opportunity you have to provide insights and responses to such policies to ensure we continue to prevent and minimise harm from gambling across Aotearoa New Zealand.

38. Please feel free to forward any questions that you have regarding the comments that we have included in this submission. We would welcome the opportunity to present orally, should such an event arise.

Naku noa, nā

Ms Selah Hart  
Mana Amorangi | Chief Executive Officer  
Hāpai Te Hauora Tāpui Limited  
Level 1, 6-8 Pioneer Street, Henderson  
P: 021 083 27944 E: selah.hart@hapai.co.nz
Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

★ It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
★ If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter/s Details

Full Name: Taisha Abbott
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Phone Number/s: 07 - 839 6871 (Daytime), 02040046856 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.
☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☒ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed: _____________________________ Dated: 25.3.21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

Privacy Statement

All submissions (including the name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of this policy review process and hearing. All information collected will be held at Ōtorohanga District Council, 17 Maniapoto Street, Ōtorohanga with Submitters having the right to access and correct personal information.
The Salvation Army Oasis – Waikato

Submission to
Ōtorohanga District Council

on the
Draft Gambling Venue Policy Review 2021

Authorisation statement:

“This submission has been authorised by the National Operations Manager – Oasis within the Addiction, Supportive Accommodation and Reintegration Services of The Salvation Army”

We welcome the opportunity to make Oral Submissions

Please contact

Taisha Abbott
Public Health Worker
021 729 890
taisha.abbott@salvationarmy.org.nz
1 BACKGROUND

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

1.2 The Salvation Army Oasis service 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, gambling counselling had been provided in Wellington and Christchurch as needed for some years. Since then, the number of clients seeking help for gambling related problems has 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 gambling harm reduction clinical and public health services.

1.3 The Salvation Army Oasis offer free outpatient services for gamblers, their families and affected others, alongside public health services; and are staffed by qualified and experienced clinical and public health practitioners. The Army also has a national Addictions Leadership Team supported by the larger Salvation Army administrative infrastructure.
2 GENERAL COMMENTS

2.1 The Salvation Army has persistently engaged with Governments around gambling related harm. We continue to contend that one of the key focuses of the Gambling Act 2003 should be, as per section 3(b) of the Act, to *prevent and minimise the harm caused by gambling*. We submit that the Government and local Councils should make harm reduction a key focus of all gambling policy reforms they undertake.

2.2 As a provider of services to those affected by gambling harm, The Salvation Army Oasis sees the detrimental effects that gambling harm has on the wellbeing of communities around New Zealand. Our observations are supported by a wealth of New Zealand research which indicates that the range of potential harms from gambling spans multiple domains of individual and community wellbeing, including mental and physical health, material welfare, employment and productivity, quality of life and social cohesion. While recent estimates of the prevalence of problem gambling vary widely, it is likely that between 3.2% and 7.5% of adult New Zealanders are currently placed at risk by their gambling. This equates to between 292 and 685 local Ōtorohanga residents whose health is directly threatened by the current gambling environment. Policy remains one of the most effective means of addressing this threat.

2.3 Non-Casino Gaming Machines

The Salvation Army is particularly concerned with non-casino gaming machines (NCGMs), as this mode of gambling is responsible for the majority of the harm observed in New Zealand. The gambling industry itself acknowledges that NCGMs are more likely to induce harm than lottery products. NCGMs are also the most highly accessible mode of gambling in New Zealand aside from online gambling, with 1,255 outlets nationwide. The literature advocates for a number of practices to minimise and prevent problem gambling - one of the best-supported strategies involves limiting access to gaming machines.

2.4 Vulnerable Population Groups

Gambling addiction can be found across all groups in society, but it is those groups at the lower end of the socio-economic spectrum that suffer most. Groups most likely to be in poverty and hardship include women, sole-parent families, Maori, Pacific Island peoples, refugees, people living with disability or illness, beneficiaries and people in low-paid employment. Continued failure to address and respond to these inequities is not only
unjust, but in the case of Maori, also constitutes a violation of Clause 1 of Te Tiriti O Waitangi, which requires the Crown to protect the interests of tāngata whenua.16

2.5 Sustainability of Community Funding

The long-term trend of declining participation in gambling activities, including NCGM gambling, is likely to gradually reduce the availability of gambling-derived community funds with or without further regulatory intervention. The Salvation Army maintains that the Class 4 funding model is neither sustainable in the long term, nor favourable in the short term for New Zealand communities. Only about 40% of GST-inclusive NCGM revenue ever reaches grant recipients, and a high proportion leaves the regions as central government taxes and society costs.

Some of the charitable causes funded through Class 4 gambling are essential public goods and services. However, because a large proportion of gambling revenue is derived from those with the least disposable income, the Class 4 funding model has been criticised as being analogous to regressive taxation.17 Public opinion reflects such concerns – since 1985, the proportion of New Zealanders who are opposed to or uncertain about the use of gambling revenue to fund charitable causes has risen steadily.18 The Salvation Army believes that councils have an important role to play in incentivising communities to seek less harmful ways to fund necessary services.

2.6 The Gambling Environment in Ōtorohanga

a. In the year ending June 2020, $81,830.22 was lost in NCGMs in Ōtorohanga.19 This represents 0.07% of the total national spend, with Ōtorohanga residents making up about 0.18% of the national population.20 This representation may have decreased within the most recent quarter, due to venue closures as an impact of Covid-19. Because of this, it is important to not consider any recent statistical decreases without further recognising trends due to the pandemic only.

b. Accessibility is increased by Ōtorohanga’s small geographic footprint and ease of getting around.

c. Through our MVE work, The Salvation Army Oasis – Waikato has the opportunity to visit venues and observe the standard of host responsibility practice. We think it is relevant to note that, while the Gambling Act 2003 requires gambling venues to have in place a number of harm minimisation measures, the legislation is not consistently adhered to. While a small number of venues perform adequately, we feel that many fail to provide an acceptable standard of care to their customers. This sentiment is echoed by several of our clients, who have been able to enter venues from which they are excluded and
exhibit clear signs of harmful gambling without attracting the attention of venue staff. We are particularly concerned about the capacity of venues to protect the welfare of intellectually disabled people who have difficulties with gambling.

3 FEEDBACK ON THE SOCIAL IMPACT ASSESSMENT

3.1 The Salvation Army Oasis – Waikato wishes to acknowledge Ōtorohanga District Council for taking steps towards implementing a safer gambling environment. However, we wish to draw the Council’s attention to some points for consideration, including the need to make a Social Impact Assessment more accessible.

3.2 Gambling in Ōtorohanga – Risk Profile

a. Social Impact Assessments include guidelines issued in 2013 by KPMG, on behalf of the Ministry of Health. The Salvation Army Oasis – Waikato believes that these guidelines are problematic, and urges caution in their application for the following reasons:

b. Prevalence Rate

The method suggested for calculating a local prevalence rate is statistically and epidemiologically unsound. The authors suggest that an estimated local prevalence rate can be derived based on the national help-seeking rate of 9.3%, and the numbers of presentations to services. Unfortunately, since presentations to services include not only self-identified problem gamblers, but also significant others who are affected by someone else’s harmful gambling, this calculation is subject to numerator-denominator error. Furthermore, due to wide variation in the accessibility of problem gambling services across different districts, it is difficult to justify the assumption that the proportion of problem gamblers who present to services is nationally consistent.

c. Gambling Density

This metric includes per-capita density as well as expenditure but fails to consider geographic density. Physical proximity to gambling opportunities is recognised as a key determinant of gambling behaviour, and since vast variations in geographic density are likely to exist between rural and urban areas with the same per-capita density, we do not feel that this metric fully captures the most salient aspects of gambling accessibility.
For these reasons, we urge Ōtorohanga District Council not to place undue weight on any conclusions arrived at through the Community Risk Profile process. Instead, in the absence of reliable local prevalence estimates, we argue that 'intuitive' measures such as per-capita spend and the high accessibility of NCGMs in Ōtorohanga provide ample justification for a more restrictive policy.

3.3

a. Accessibility of the Ōtorohanga District Council Social Impact Assessment is difficult. Because of this difficulty, this section was inferred and based on National reports as opposed to local ones. It is unclear if the Ōtorohanga region has a Social Impact Assessment. We urge the council to make an assessment easier to access as it allows for greater understanding of the impact of gambling on residents.

b. Should the council complete an updated Social Impact Assessment we encourage research into the area of supply reduction and sinking-lid policies. From public health and health promotion research and literature, supply reduction is a proven effective strategy for reducing harm. Reviewing this strategy could help guide the council in future policy reviews. Reducing access to NCGM’s is likely to reduce harmful gambling behaviour over time.

4 FEEDBACK ON THE PROPOSED POLICY

4.1 Ōtorohanga District Council has the legislative power and authority to be much more proactive in relation to harm reduction. The Salvation Army Oasis – Waikato does not believe that the proposed policy does enough to counter the serious problem of gambling-related harm in Ōtorohanga.

4.2 Relocations

a. **We oppose** the Council’s proposal to permit gambling venues to relocate with the new council consent policy.

By permitting relocations, Council may unwittingly incentivise venues to move into vulnerable communities where they believe they will achieve higher turnover. Furthermore, the removal of a sinking lid policy on a basis of localised data from the previous quarter does not accurately represent the impacts of Covid-19 and venue closures and any mid to long term impacts. Analysis of a quarter’s data only is not robust enough to ensure any conclusions can be drawn.
At the end: If Ōtorohanga District Council elects to retain this provision, however, we suggest that the relocation consent process should include a requirement for venue operators to demonstrate how they will mitigate the negative effects of their relocation.

b. The range of harms which can result from gambling is broad and far-reaching; affecting whole communities, not just the 3.2-7.5% of New Zealanders who struggle with gambling each year. While it is difficult to quantify precisely the impact that gambling harm has on the Ōtorohanga region, a broadening of the current gambling venue policy in the Ōtorohanga region to increase community benefit does not address the harm that comes from EGM gambling. We strongly encourage the Council to adopt a Sinking Lid policy with no relocations.

4.3 Benefits of a Sinking Lid Policy
a. A Sinking Lid Policy with a no relocation clause is the only way to guarantee a reduction in NCGM numbers over time. A sinking lid policy would permit machine numbers to drop gradually, in tandem with the long-term trend of diminished participation in gambling. Addressing this may help encourage a healthy diversity of entertainment options to flourish in the Ōtorohanga region and contribute to the revitalisation of the Central Business District.

b. Evidence-based public policy which prioritises the health and wellbeing of communities is one of the most effective preventative tools available to us. A Sinking Lid is the only policy option endorsed by gambling researchers, public health experts, and New Zealand gambling service providers. The gradual reduction in NCGM’s as a harm minimisation approach is supported by global public health research and literature.

c. We are aware of discussion in the Class 4 sector that reducing NCGM numbers will drive patrons to online gambling. There is no evidence to support this claim and our work with gambling harm clients does not support this hypothesis either.

5 CONCLUSION
Gambling-related harm remains a stigmatised and neglected public health issue, yet the impact harmful gambling has on crime, poverty, employment, productivity, family functioning, and individual and community wellbeing is more significant than most people are aware. Through this policy review, Ōtorohanga District Council has an opportunity to make changes which will reduce harm and benefit our communities both now and in the future. We urge the council members, as leaders in our community, to adopt a Sinking Lid Policy with no relocations. To do so will demonstrate that council leadership places value on community wellbeing and is doing everything possible to support healthy communities, free from harm.


5 Ibid. [Prevalence rate among those aged 15 and older].


7 The NZHS and NGS survey different age groups – 15+ and 18+ respectively.


13 Centre for Social and Health Outcomes Research and Evaluation & Te Ropu Whariki (2008).

14 Centre for Social and Health Outcomes Research and Evaluation & Te Ropu Whariki (2010).


Vasiliadis et al. (2013).
30 March 2021

Tēnā Koutou te Kaunihera o Ōtorohanga whaanui,

Ngā mihi i runga i te āhuatanga o te wā.
Pai marire

Submission re: Class 4 Gambling Venue Policy Review 2020

Te Runanganui o Ngāti Hikairo are writing to inform you that we are opposed to the proposed changes to the Gambling Policy from a ‘Sinking Lid’ to a ‘Controlled Increase in Venues’. Council is proposing that an amendment to the current ‘Sinking Lid’ policy in favour of a ‘Controlled Increase in Venues’ policy, will support an increased opportunity for business growth in the Ōtorohanga District. We suggest that the social impact on the community will outweigh any proposed business growth opportunities.

Harmful gambling can cause stress-related physical and psychological ill health. Other adverse effects include family breakdown, domestic violence, criminal activity such as fraud, disruption to or loss of employment and social isolation. Harmful gambling can profoundly impact on the physical, emotional, and financial health of family, friends, workmates and others in the wider community. There is also the wider social cost of crime and dysfunctional communities and includes the police, the justice system, social welfare and charitable organisations working to alleviate poverty.

A disproportionate amount of gambling harm and gambling losses are carried by people on welfare benefits and in low-income areas. A study in 2005 found that almost 37% of food-bank clients were either problem gamblers themselves or were affected by the gambling of others. The ratio of pokies to people in well-off areas is 1 to 465, but the ratio of pokies to people in poorer areas is 1 to 75.5. In communities where there are fewer choices to get ahead financially,
there is greater belief or hope that “a big win” can take you out of poverty. According to the New Zealand Index of Deprivation (NZDep), Decile 1 represents areas least deprived in New Zealand while Decile 10 represents areas most deprived. The Ōtorohanga District scores at Decile 10, indicating an area considered to be most deprivation.

Due to socioeconomic disadvantage experienced by Maori, Maori are overrepresented in low socioeconomic communities. Kawhia is one of these communities, and we are sure that the existing number of Gaming machines in Kawhia already do considerable damage to whanau. We are opposed to any plans to increase the number of gambling machines in the district and would suggest that any decision to increase them would be irresponsible of the Council.

No reira
Ngā manaakitanga,

pp. Susan Turner
Chairperson
Te Rūnanganui o Ngāti Hikairo

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

* It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
* If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter/s Details

Full Name: Bell
Contact Person: Phi
Email Address: kcempi@qmail.com
Phone Number(s): 07 873 2789 (Daytime), 021 4 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

attach

(Filling this form vi complete order, the or go on the page, then jums and then is very difficult to re adjust. Finally after several hours of trying and freezing the whole document was lost and I had to start all over again. What a waste of my time.)
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature] Dated 14/02/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
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Submission Statement

I am completely opposed to the re-introduction of Gaming machines (Pokies) into the Ōtorohanga District Council’s area.

In 2010 the Council was given clear evidence of the harm these machines cause with no benefit back to the Community. The Council chose, at that time, to retain the Sinking lid policy which I fully endorse.

The facts have not changed about their harm and addictive nature, yet the Council is looking to bring in machines that cause harm in a socially deprived area.

I would refer you to: Gambling report – Results from the 2016 Health and Lifestyles Survey completed in 2018 Written by Thewaporn (Wa) Thimasarn-Anwar, Dr Hanna Squire, Dr Holly Trowland & Dr Greg Martin. Especially pages 19-21 which is titled “Class 4 Venues and Electronic gaming Machines (Pokies)”

I have copied extracts from that report and put them on Page 2 of my submission.

I have also included a “Stuff on line” report, on pages 3-4, written showing the concern in having Pokie machines in South Auckland area.

It is well documented that New Zealanders gamble. 70% of Kiwis had gambled at least once in the survey (that year) done in 2016. This included Lotto and horse & dog racing. This culture is not going to change in big way. When I worked at the Horotiu freezing works in 1974-75 I would watch lots of workers playing “Two Up” as soon as they got their pay packet, that week. In a few days the games would die down as they lost their money. The one guy who made money and I understand, had several nice houses in Ngaruawahia, lent out money at the rate of payback of 5 cents in every dollar.

Also if you would like an interesting book to read try reading Jared Savage’s book “Gangland”

He is a crime reporter and has followed the huge increase in production, sale and consumption of Methamphetamine in New Zealand. The gangs that do this work will then launder the money they get through machines accepting a loss as a price to pay for having “clean money”

Several years ago “The Tennis Club” in Ōtorohanga wanted to renew their court services. They did not get any money from the Gambling Trust but set about with hard work and determination to raise over $60,000 to resurface the Courts.

Has the Council been down to the Support house to talk to the workers there and get their views on problem gamblers and the effects on those around them?

In my Opinion the harm coming from Pokie machines is well known, but I will reiterate them:

Pokies are ‘addictive by design’. That means they have been deliberately designed to keep players using the machines for as long as possible.
Continuity
Pokies are a continuous form of gambling which means that any winnings can immediately be “reinvested.” In other words, you put the money in, push a button and you get a result within seconds. In contrast, Lotto is a non-continuous form of gambling; you purchase your Lotto ticket and wait up to a week for the result.

Isolation
Gambling on pokies is a very solitary activity unlike games played with other people. The environment also encourages uninterrupted and solitary play with Pokie rooms in bars often having dimmed lighting, no tables to socialise around and an entranceway that minimises scrutiny. It’s just the player and the machine.

False wins
This happens when the amount of money you get back as a win on a multi-line bet, is actually less than what you put in, yet the machine’s bells and whistles go off making you think you’ve won!

Nearly wins
Pokie machines give you the impression that you’ve nearly won so that you will keep on playing on the machine, when in fact, you haven’t.

Free spins
These just make you feel you’re doing better than you really are by making it look like you’re getting close to a win.

These Machines in my Youth were called “One Armed bandits”, because you pulled a lever and they took your money. Today they work in exactly the same way except with more bells & whistles.

In our district, I understand that we have 23 machines. 18 at the Workingman’s Club and 5 at the Kawhia Hotel.

In 2020 over $710,000 was lost in these machines. That is $31,000 on average to each machine. In Ōtorohanga alone, $560,000 didn’t make it back to the families. That’s a fair bit of money. If it goes into the Community, then that money goes around 4 times. That is a substantial loss to our area.

Please do not increase the number of machines and social harm they will bring to our Community
CLASS 4 VENUES AND ELECTRONIC GAMING MACHINES ('POKIES')

• 1 in 10 New Zealand adults (around 374,000; 10%) had played a gaming machine at a pub or club in the past year.

• Participation in pokies in pubs or clubs has been decreasing steadily since 2006/07, when it was 19%.

• Nearly half of New Zealand adults (46%) believed that pokies in pubs or clubs were harmful and over one third (35%) believed they are socially undesirable. The opinions that pokies are potentially harmful and socially undesirable have become less prevalent since 2010.

Pokies and alcohol

• The majority (59%) of New Zealand adults do not believe that ‘pokie machines make a pub or bar more enjoyable to spend time at.’ Respondents who agreed that pokie machines make a pub or club more enjoyable tended to be: Asian or Pacific peoples, those who live in medium and high deprivation areas, and those who engaged in a high number of gambling activities.

• 2 in 5 (42%) prefer to drink in pubs or bars that do not have pokie machines, and only 14% preferred to drink in pubs or bars that have pokie machines. Those who did not play gambling machines or pokies themselves were more likely to prefer to drink in pubs and bars that do not have pokie machines.

• Out of those who play pokies (either at pub or club and casino), around 1 in 3 (29%) reported that they spend more on pokies when they drink alcohol. Moderate-risk and problem gamblers and those involved in several gambling activities were more likely to spend more when they drink.

Pokie venues and staff interaction

Pokie players mostly reported no interaction with staff at gambling venues (49%). There were very few cases where staff had spoken to the pokie player with a concern about their gambling (0.3%) or given them a leaflet on gambling support services (0%).

The most commonly reported form of gambling associated with household harm was with electronic gaming machines in pubs and clubs. Gaming machines at pubs and clubs were also the most commonly reported gambling activity to be considered socially undesirable.

Consistent with previous years, ethnic inequalities in household experience of gambling harm persist, and pokies are the form of gambling most linked to harms and most recognised as causing problems. While online gambling, which is a potential emerging concern, does not feature as a prominent mode of gambling in the current data.

• Almost half (49%) of people who gamble on gaming machines/pokies in pubs or clubs at least monthly were found to be at risk.

The highest level of concern about the community levels of gambling were among Māori and Pacific peoples, those in high deprivation areas and those with some form of university degree.
Article from Stuff on Line

New figures from the Department of Internal Affairs (DIA) show pokie machines venues in south Auckland made over $26 million in profits in the final quarter of 2020.

This was up by 20 per cent on the $21,866,959 in the third quarter of last year. The figures are broken down by local board areas of south Auckland, including Franklin, Māngere-Ōtāhuhu, Manurewa, Ōtara-Papatoetoe, and Papakura.

Problem Gambling Foundation spokesperson Andree Froude said the latest stats from the DIA aren’t a surprise.

“In the fourth quarter of last year gaming machine profits ($252 million) nationally were the highest they’ve ever been since records started,” Froude said. “The fact 50 per cent of our pokie machine venues are in our poorest areas, like south Auckland, means the figures aren’t a total surprise, but they are concerning.”

She said the figures also show that, after a drop in the second quarter due to the Covid-19 lockdown, many people have returned to their old habits.

Froude said people often use pokies as a means of escape from stress and other factors in their lives and not just to gamble.

“And last year was a tough year for a lot of people,” she said.

In October the Auckland Council voted to retain its sinking lid policy for pokie machines in the region.

The policy means no new consents are issued for new venues and it prevents the machines from one club being transferred to another if it closes, helping to reduce the overall number of machines.

But the majority of the venues continue to be located in high-deprivation areas like south Auckland.

Froude said while sinking lid policies for pokie machines are a good way to minimise harm and keep a check on the numbers of machines and venues, they take a long time to work because they rely on venues closing.

And she said in areas like south Auckland there are still pokie machine venues everywhere.

“I think the whole community funding system which relies on money from pokies is also a problem and relies on money coming from our poorest communities. And of course the money doesn’t always go back to the communities it comes from.”

Froude said the Gambling Act 2003, which helps regulate the industry, is almost 20 years old and is no longer fit for purpose.
“We would like to see councils have more power over whether they want to have pokie machines in their communities because they review the venues every three years and I think they are starting to recognise that,” she said.

“A lot of communities don’t want them and there’s more recognition of the harm they cause.”

A report to the council’s Regulatory Committee in October last year illustrated the sheer scale of problem gambling in south Auckland.

According to the council paper over half the people in Auckland seeking treatment for pokie machine gambling addictions were from south Auckland. And just over half of those seeking help are gaming machine users.

A 2017 Ministry of Health study found individual gambling produced the same level of harm as high alcohol consumption, anxiety and depression.

And it found the cumulative harm of gambling was close to twice that of drug use disorders, bipolar affective disorder, eating disorders and schizophrenia combined.
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Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

* It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
* If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter/s Details

Full Name: Susan Huhana St
Contact Person: Susan Stevenson
Email Address:
Phone Number/s: 021 226 3476 (Daytime) 021 226 3476 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Please see attachment to my Submission Form.

Received
31 Mar 2021
Ötorohanga District Council
Susan Stevenson: Attachment to my Submission Form:

Submission Statement Class 4 Gambling Venue Policy.

Provide the reasons for your submission and policy choice.

I oppose the Council’s proposal to change the Class 4 Gambling Venue Policy from the Sinking Lid Policy to the Controlled Increase in Venues Policy because:

1. Increasing Gambling/Pokies Machines DOES NOT align to or with the Council’s Annual Plan Mission Statement which says:
   - “Otorohanga District Council will strive to be the best rural council in New Zealand, operating proactive policies which promote progress while taking into account social, cultural, economic and environmental needs.”

It is well-documented that increasing Gambling/Pokies machines is NOT considered a proactive policy for community developments; it also does NOT promote progress in ANY community.

2. Increasing Gambling/Pokies Machines DOES NOT align to or with the Council’s Long Term Plan (LTP) Five Key Objectives either:
   - Use Resources Efficiently: Council and the District must ensure that it makes the best possible use of the physical, social, economic and cultural resources available to it.
   - Support Young and Old: Both young and older people will be increasingly important in the future of the District, and initiatives that benefit these groups should be encouraged and where appropriate supported.
   - Enable Economic Growth: Opportunities for the development of additional housing and businesses should be facilitated, and the growth of existing businesses supported.
   - Enrich Our Local Identity: We should establish a greater sense of ‘who we are’ in our District, that reflects our predominantly rural character, our history and the diversity of our communities.
   - Build Community Resilience: The world is changing and the systems, organisations and processes that may have served well in the past may need to be changed to ensure that they are adequate and sustainable in the future.

Looking at the 5 key objectives it is plainly obvious that increasing Gambling Venues/Machines is NOT an efficient use of our resources; WILL NOT support our vulnerable young and old; DOES NOT FIT with our economic growth plan; DOES NOT enrich our local identity and will do nothing to Build Community Resilience.

Though the proposed controlled increase in Venues is probably best fit to be resisted.

3. The makeup of our population shows (ref LTP) our aging population over 65 is increasing as is our under 15’s. So Council should be looking to attract businesses/organisations that will support these sectors... not put them at risk.
4. Although it appears we have a good median income on the surface, it becomes apparent that the median income is inflated due to the high levels of income in our rural sector (ref LTP page 12). The financial gap between the financially secure and the financially vulnerable is increasing and along with the social stresses and issues that will escalate with more gambling venues.

5. In the new proposal, The Council has sole discretion of the decision/outcome for any applicant. I am concerned that this is a conflict of interest – how can Council be ‘neutral’ when they are wanting to “increase business AND still pay attention to social cost?” I believe this practice is not best practice and Council needs to establish a ‘group that is qualified to assess social impacts objectively.’

6. The prison expansion, power station and dairy factory will bring a financial increase to our district, the Council should be focussing on supporting new & existing businesses to be able to flourish and thrive instead of focussing on a gambling model that has proven time and time again to cause hardship socially, family stress issues, mental health risks and economic loss.

Summary
I cannot see any application of the LTP or the Annual Plan objectives within the new proposal. Changing to the new proposal is not viable for all of the reasons above and I believe the Council needs to be proactive, and go back to the sinking lid policy.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

My preferred decision is: Sinking Lid option, and Policy.

I would like Council to apply the mission statement and key objectives to ensure their decisions are aligned and supportive of.

I would like Council to create an independent, neutral panel of people that are trained and qualified to assess social impact issues.

Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

Privacy Statement

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter's Details

Full Name: Ōtorohanga Support House Whare Āwhina
Contact Person: Deb Hill
Email Address: manager@otosupport.nz
Phone Number/s: 873 8156 (Daytime) 027 577 1044 (Mobile)

Submission Date: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current 'Sinking Lid' Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

We support a true sinking lid.
We oppose all opportunities for class 4 venues to either relocate and/or merge.

At Ōtorohanga Support House Whare Āwhina we see the direct impact that gambling has on individuals and whanau.
Gambling is one of the contributing factors towards the demand for services we provide such as budgeting, foodbank, counselling, family support and family violence intervention.
Gambling addiction also has a detrimental impact on the clients as seen by outside organisations as noted by Mark Pitts-Brown our local probation officer.
Pokie machines are seductive in their appeal and quickly lead to addiction. This addiction can then become multiple as pokies have the same effect on the brain as chemical substances such as alcohol and drugs.

Possible effects from gambling:
• The children and whole family suffer from the lack of money available
• Gambling becomes normalised for children
• Leads to negative financial role modelling for children
• Can become multi-generational
• Impacts on physical and mental wellbeing
• Suicide – impacts on immediate whanau and the wider community

Ōtorohanga Support House Whare Āwhina stresses the importance of the role Ōtorohanga District Council has to play in minimizing gambling harm through regulation of the supply of pokie machines and access to them.
We offer the opportunity to work and engage alongside the Ōtorohanga District Council, to support and provide the community with resources that would help to raise awareness around the harms of problem gambling.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Keep policy as it stands.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated 31 March 2021
(submission, or person authorised to sign on behalf of the Submitter)

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* email to claire@otodc.govt.nz
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Submission Form
Ötorohanga District Council
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter's Details

Full Name: Ötorohanga Lyceum Club

Contact Person: Dianne Murphy

Email Address: colin.dianne.murphy@gmail.com

Phone Number/s: 07 873 8946 (Daytime) 021 034 0846 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☐ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Ötorohanga Lyceum Club supports the current Sinking Lid Policy. There is no justification to increase ANY gambling outlets in Ötorohanga. Gambling is addictive and causes great harm to individuals and families.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Lyceum support for the current Sinking Lid policy centers on the harm and damage done to people’s lives and the cost to rehabilitate people. Members have heard stories of families affected by someone’s addiction and the stress it causes. Recovery is not always successful.

Members have also asked why the decision on this policy was not widely advertised. The majority only heard about it in the last few days.

The funds that come back to the community is a pittance, merely 10%. The money that was lost to gambling would be welcomed if it was spent in Otorohanga in local businesses.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated

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Submission Form
Otorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter's Details:
Full Name: Michelle Dawn Saunders
Contact Person: 
Email Address: kouhwaizay5@gmail.com
Phone Number/s: 0273852953 (Daytime) 04738 29 3 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020
Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Banking Ltd’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

I was currently a part owner in the Kawhia hotel. I saw what effect the pokies have on people. There are families that come in and play, max out their cards and the old one will borrow money from the bar to carry on playing. When the pub is really busy, the staff have to leave behind the bar, the bar I feel is not supervised properly. We do not need any more pokies in the community.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Would like to see no more pokies brought into hotels. They have enough especially Rawhia Hotel. I feel they have an effect on small communities, and families. You only have to read all the comments on F.B. to see the overall majority are against pokies.

☐ Tick here if you are attaching further information or additional pages

Declaration

☑ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Claire Saunders

Pleated plesed

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Submission Form
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Class 4 Gambling Venue Policy
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<table>
<thead>
<tr>
<th>Submitter/s Details</th>
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<tbody>
<tr>
<td><strong>Full Name:</strong> BARBRO R. KANTA</td>
</tr>
<tr>
<td><strong>Contact Person:</strong> 13 Hillcrest Ave, 3900 Otorohanga</td>
</tr>
<tr>
<td><strong>Email Address:</strong></td>
</tr>
<tr>
<td><strong>Phone Number/s:</strong> 021 113 280 (Daytime)</td>
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**Submission On: Class 4 Gambling Venue Policy Review 2020**

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

As a local resident and ratepayer, I with this object to introducing more gaming venues and pokie machines to Ōtorohanga.

Personally gaming/gambling does not affect me however I know people/families who have suffered losses through gaming activities. So I do not find this a positive activity for Ōtorohanga community to support.

Kind regards

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Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Please maintain "Sinking lid" Policy:  

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]  
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 30.03.21

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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Submitter/s Details

Full Name: Tanya STANBURY PEA

Contact Person: [blank]

Email Address: t斯坦布里奇@gmail.com

Phone Number/s: 0274532214 (Daytime) 0274532214 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

I support the current ‘Sinking Lid’ Policy    □ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice

Otorohanga is my hometown where I was born here and I live here. My forefathers of Turner and Weeks families were born and lived here.

This submission is to represent the many generations before me and the values that we envisioned for the future and to speak for the many generations to come.

There is no argument that social change is inevitable and evolutionary and whilst most change is progressive and beneficial for the community and the country there are some that are detrimental and devastating. One such change to be in the latter category would be the gambling policy. I vigorously support status quo of the gambling policy.

Fact 1 - Historical gambling leads to problem gambling leads to addiction

Fact 2 - Gambling addictions is rising

Fact 3 - Out of any addiction are not only self-destructive but destructive to all who are associated with the addict be it relative, friend, work, social groups

(Continued on next page)
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Submitter/s Details
Full Name: [Redacted]
Contact Person:
Email Address: [Redacted]
Phone Number/s: 0872453244 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020
Submissions are invited from 19 February to 19 March 2021.

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

[Handwritten text]

Count
I support "the sinking lid policy" as it minimises the dissemination of the addictive product in the community.

To promote this product anywhere more than it currently would be like allowing "Alcohol" to be sold in dealers. Definitely businesses will be affected.

e.g. 1) The mental health business will increase
2) The family disintegration business will increase
3) The social chaos businesses such as Crime, Violence, Poverty will increase.

"Sinkings lid Policy" please.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

1) Maintain Status Quo.
2) Strategise to eradicate gambling completely over next 20 years, for instance, “The non-smoking policy is a great example.
3) Lobby government to regulate “on line” gambling and ideally take it “off line.”
4) We are a fantastic community with fantastic caring people. Let’s lead the way to a “gambling free community”

Future ki muri kia whakatika a mau i look to the past and invest in the future now with hope courage and determinate.

KIA KAIA OUR FANTASTIC DISTRICT COUNCIL.

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed: [Signature]

Dated: 30/3/2021

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

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Submitter’s Details

Full Name: NINFA GANITUANGCO
Contact Person: NINFA GANITUANGCO
Email Address: NINFA.GANITUANGCO@kotui.tradef.org.nz 07- 878 3680 (Daytime) 07- 878 3680 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☐ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Over the years, alcohol abuse, influence in risk behavior to the population, versus gambling been destroy lives of the people as it leads to uncontrollable urge to keep gambling despite the toll it takes on one’s life, which may risk something. The person values their increase willingness to involve in destructive pattern of behavior.

For me, working in the community Mental Health Service, it should be beneficial for our community to reduce the problem for the betterment of the people as the future generation.
Advice for Council Decision-making
Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declarations

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated 12/03/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

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Have your say on pokies in Ōtorohanga

Ōtorohanga District Council is seeking feedback on its proposed gambling venues policy for electronic gaming machines, more commonly known as ‘pokies’. The Council’s current policy is a “sinking lid policy” meaning that every time a pokie venue closes, it is not replaced, and the number of venues permitted in that district decreases by one.

Your Council is looking to change this to a “Controlled Increase in Venues” policy. This means anyone wanting to open further pokie venues can apply for a licence to the Department of Internal Affairs (DIA) provided consent is given by the Ōtorohanga District Council in the first instance. The Council will have the discretion to grant a new licence on a case-by-case basis. Given the Council have cited the desire to expand business opportunities, it seems clear their intention is to grant new consents. We think a sinking lid policy should be maintained.

Why is this important?
Currently Ōtorohanga district has 23 machines in two venues. In the 2019 year $977,000 was lost on these machines; that’s over $2,000 daily.

Some people support pokies because the gambling losses are used to fund community groups. By law, 40% of the losses are returned to the community. However, this isn’t always to the community where the money came from. For example, in the 2019 year, only $100,000 went back to the Ōtorohanga community, from $977,000.

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 general are clustered in areas of the highest deprivation, where people can least afford to lose significant amounts of money.

What needs to happen?
We are asking the Ōtorohanga District Council to continue with a sinking lid policy. That means the Council will refuse any pub or club that applies to host pokies and they cannot move around the district.

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

What do you think? Have your say! Submissions close 19th March 2021.

For full details about the Council’s proposed policy read here: https://www.otodc.govt.nz/home/consultations/

** 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 *

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<thead>
<tr>
<th>Contact name* First</th>
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<td></td>
<td></td>
<td>22 Omihi Crescent</td>
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<td>0210 254 7665</td>
<td><a href="mailto:lucas12@gmail.com">lucas12@gmail.com</a></td>
</tr>
</tbody>
</table>

If representing an organisation: Organisation name N/A

Position/title

Submission

Dear Ōtorohanga District Council,

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

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

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

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

because: Venues $ Match is NEEDED IN Ōtorohanga

Write your reasons here:

Hard copy submissions can be returned to the following addresses:
1. Email a completed submission form to claire@otodc.govt.nz
2. (NB. This is not a freepost)
IT IS DIFFICULT TO IMAGINE THAT AN INCREASE IN
REGARD TO GAMING VENUES AND MACHINE AVAILABILITY WOULD
RESULT IN BUSINESS DEVELOPMENT IN THE REGION

WITHOUT A SIGNIFICANT INCREASE IN AFFORDABLE HOUSING AND
EMPLOYMENT OPPORTUNITIES IT IS HARD TO ENVISAGE ANY
BENEFIT WHATSOEVER.

I THINK THAT THE FOLLOWING ANALYSIS NEEDS TO TAKE PLACE
SO THAT A SCIENTIFIC APPROACH TO A CHARGE IN POLICY
CAN HAPPEN:

1. WHAT IS THE TRUE REASON FOR THE PROPOSAL ie ARE LOCAL
   ESTABLISHED BUSINESSES ABLE TO APPLY

2. WHAT IS THE OCCUPANCY LEVELS AT PRESENT ie ARE ALL
   GAMING SEATS FULL AT ANY GIVEN TIME?

3. WHAT IS THE RETURN TO OUR LOCAL COMMUNITY SO WHY?

4. WHAT SAFEGUARDS ARE IN PLACE FOR EXISTING MACHINE
   OPERATIONS?

IF THERE IS AN INCREASE IN MACHINES WITHOUT PROPER
DUE DILIGENCE THEN EXISTING BUSINESS COULD SUFFER. ALSO
LOCATION OF VENUES IS CRITICAL AND IT MUST BE KEPT
IN MIND THAT INCREDIBLE AHEAD WILL, WITHOUT DOUBT, RESULT
IN HARM TO OUR MOST VULNERABLE.

ITS A BAD IDEA FROM BEGINNING TO END.
Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: [Handwritten: Paul Smith]

Contact Person:

Email Address: [Handwritten: summitsformsotorohanga@gmail]

Phone Number/s: [Handwritten: 0275 440 493] (Daytime) [Handwritten: ] (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☐ We support the current ‘Sinking Lid’ Policy
☐ We support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Tick here if you are attaching further information or additional pages

Declaration

☒ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated

30/3/2021

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

Privacy Statement

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Submission Statement

Please accept my submission in support of the current “Sinking Lid” Policy:

My support of the “Sinking Lid” Policy is based on the premise that the Otorohanga District has many strong and well-connected community clubs, clubs that have maintained the important interdependent relationship between the local businesses/farming community and themselves. This is a situation that is unique in NZ with so many community clubs now dependant on Pokie money. It is a situation that the “Sinking Lid” Policy has helped to maintain, so we need to protect it, not ditch it.

Having been involved in sports administration since the 1990’s, when I returned to Otorohanga in 2013 (after spending 23 years away) I was eager to understand how the Otorohanga Sports Club managed to maintain a club environment that most clubs are envious of. Visiting clubs always commented on the clubs excellent culture, the club is well known around New Zealand for it. I've concluded that one of the reasons is because it doesn’t raise its revenue from Pokies, it still raises it’s revenue the old fashion way, drawing on the local farmers and business people; it ensures they have ownership and they in turn feel comfortable sponsoring the club accordingly. In direct contrast, clubs that have become reliant on Pokie Money have lost their capacity to draw their revenue from their local communities. It leads to a weakening of the connection to the community, essentially it helps dislocate the social fabric of the community that they exist in. This is a critical problem that will need attention if clubs are to survive. My argument is that relying on Pokie machines is the heart of the problem not the solution, a society cannot rely on addiction and dependency of what is often the 10% of our lowest socio groups to fund the rest of our sports, art and cultural clubs, that is morally wrong and is not sustainable.

This premise is not something I have just thought up in response to this policy amendment, in 2019 I stated this in the Otorohanga Sports Presidents Report:

...Trust Funding can be a double-edged sword and is actually one of the contributing factors to the weakening of clubs, as members lose their sense of ownership and belonging. Clubs place their continued existence in the hands of an officials tick of approval on an application form. This is something we need to remain mindful of...

Presidents Report, Otorohanga Sports Club Inc, November 2019

So I urge Councillors to think deeply about this before changing the policy, I believe the “Sinking Lid” policy has meant that Otorohanga has missed a bullet, our clubs are not dependant on Pokie money, don’t change that.

Advice for Council Decision making

I believe that the Pokie industry as it exists is not sustainable and whether we have a Labour government or a National government, changes will be made. The harm being done is enormous, it manifests itself in many ways but I've seen it in our children who bear the brunt of their parents choices and the consequential outcomes impact on our schools and hospitals. Any person who has sat on a BOT of any school will be aware of this. A 2017 Ministry of Health study found individual gambling produced the same level of harm as high
alcohol consumption, anxiety and depression. It found the cumulative harm of gambling was close to twice that of drug disorders, bipolar affective disorder, eating disorders and schizophrenia combined.

Otorohanga District Council should lead the way as it has in the past in other areas by creating an Community Infrastructure fund from Rates that is used to ensure that our district has the adequate funding required to upkeep the infrastructure of our community clubs. This is so that our community clubs can focus on the operations and ensuring that the clubs provide an environment for our people to come together. One of the challenges our clubs have is that the up-keep of buildings in particular is more expensive than it has been in the past so an infrastructure fund would help a great deal, and morally we would be funding from the end of the socio-economic spectrum who can afford it, this is important.

The question that sometimes arises about people having access to alternative gambling facilities such as on-line has nothing to do with the Otorohanga District Council.

[Signature]

Paul Singh

30 March 2021.

Sports administration experience

I have been involved in the administration of community sport since the 1999, including being Deputy Chair of The Bay of Plenty Rugby Union between 1999 to 2008, I helped establish The Eastern Bay Rugby Sub Union in 1999, I have been President of two Rugby Clubs including the current President of Otorohanga Sports Club Inc. As a Chartered Accountant, I have in the past been the Auditor of many sports, cultural and educational clubs and institutions. I was a Board Member on The Chiefs Rugby Franchise between 2004 to 2008. As an administrator I have in the past applied for significant amounts of Pokie money, I know the territory well.
Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

★ It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
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<tr>
<td>Full Name: <strong>RICHARD and RUVE WALLACE</strong></td>
</tr>
<tr>
<td>Contact Person: <strong>Ruve Wallace</strong></td>
</tr>
<tr>
<td>Email Address: <strong><a href="mailto:ruve@extra.co.nz">ruve@extra.co.nz</a></strong></td>
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<tr>
<td>Phone Number(s): <strong>07 873 8123</strong> (Daytime) <strong>3</strong> (Mobile)</td>
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<tr>
<td>☐ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the <strong>Controlled Increase in Venues</strong></td>
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<td>Provide the reasons for your submission and policy choice</td>
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We are opposed to an increase of gambling outlets in the Otorohanga District. The Council’s contention that more gambling would benefit business growth in the District is not correct. Gambling does not benefit people. It does not benefit individuals, or families or businesses. It has the potential to become addictive and to damage and destroy lives.
Gambling is a health and safety matter which should be taken as seriously as all the other health and safety matters that the Council diligently cares for.
The suggestion that pokies are useful as entertainment and for funding cultural and sporting events is also spurious. Otorohanga people will not benefit from mindless, frustrating, disappointing, costly time spent at a pokie machine. There are already, in our District, many healthy, enjoyable opportunities and ways to be entertained and participate in cultural and sporting activities. More gambling outlets will not add anything good or worthwhile.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Leave the policy as it stands now

☐ Tick here if you are attaching further information or additional pages

Declaration:

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated

30/1/2021

Please submit your completed form by one of the following means:

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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**Submitter/s Details**
Full Name: Sarah W. (nee Brown)
Contact Person: Jack Marshall St. Ōtorohanga
Email Address: 
Phone Number/s: (Daytime) 09 599 (Mobile)

**Submission On: Class 4 Gambling Venue Policy Review 2020**

Submissions are invited from 19 February to 1 April 2021.

- [ ] I/we support the current ‘Sinking Lid’ Policy
- [ ] I/we support the Controlled Increase in Venues

**Submission Statement**
Provide the reasons for your submission and policy choice.

- I disagree with the current regulations as they impact negatively on our community.
- I believe the funds from the clubs should be used to support local events and initiatives.
- I feel that the current policies are not sufficient in protecting vulnerable members of our community.
- I am concerned that the current policies do not adequately address the risks associated with gambling.

I strongly support the implementation of the ‘Sinking Lid’ Policy to address the issues of revenue loss and community impact.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

□ Keep existing lid

b) Sinking

phase out all policy within 5 years

how we sports

clubs do funding - they didn't use to get those funds & society

was better for it.

Shame on Councillor

vote

□ Tick here if you are attaching further information or additional pages

Declaration

□ I/we do wish to be heard in support of this submission

□ we do not wish to be heard in support of this submission

□ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

Dated

(Person making the submission, or person authorised to sign on behalf of the Submitter)

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**Submission Form**

Ōtorohanga District Council: 
Class 4 Gambling Venue Policy

*Pursuant to the Gambling Act 2003*

- It is important that this form is **completed in full** and that we receive this submission prior to the closing date and time indicated on the Public Notice.
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As a teacher at Ōtorohanga College, I see the deprevation caused by pokie use in the experiences of our students. We do have students hungry at school (thankfully, free lunches have been started this week). Our students have many stresses in their lives, coping with parents with addictions whether gambling, drugs or alcohol is a true problem. Do not let more pokies in our community to do harm.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Sinking lid policy
Council funding to help people
with their addictions.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☒ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Dated 31/1/21

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

★ email to claire@otordc.govt.nz
★ post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
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Submission Form
Otahuhu District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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- If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter's Details

Full Name: Elizabeth Marain & Noel Hurley
Contact Person: Marain Hurley
Email Address: marayns@xtra.co.nz
Phone Numbers: 07 873 6101 (Daytime) 027 473 6101 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.
☐ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement:

Provide the reasons for your submission and policy choice.

The main reason for this submission is to support the “Sinking Lid” Policy. We are against the "Controlled Increase in Venues" because it opens up an opportunity for an increase in harmful property damage and harmful behaviour and actions within our community. Recent reports testify that Pokies in clubs, pubs and TAB's are the most harmful form of gambling environments. The gambling addict feels comfort in these spaces. We ask ODC elected members to reconsider and review the Gambling Venue Policy in good conscience in regard the safety, physical health and mental wellbeing of our community.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

We ask our elected members to be responsible as they review and consider this policy in good conscience for the promotion of our community’s health and wellbeing. Loosening the rules for venues will only lead to an increase in pokie machines and an increase in addiction behaviour that is harmful to the community. Its small minded to think of revenue gathering for the community when in fact it may be the exact opposite a great cost.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☒ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ______________________________ Dated 30/03/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submission Form
Ötorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: Jan Mai TAHANA

Contact Person: ________________________________

Email Address: terystaane@hotmail.com

Phone Number/s: ________________________________ (Daytime) 02108782110 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Being a resident and ratepayer of Ötorohanga I am very concerned to hear talk of having more Pokie Machines introduced into our community. Gambling is an addiction and I have seen first hand how this problem addiction can harm the person, their friends and especially their Whanau. It is no different from an alcoholic, or drug abuser's addiction having to lie cheat or steal to get their fix therefore I support the current "Sinking Lid" Policy.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Gamblers Anonymous have meetings. I would like a decision that a selected amount of Councillors attend at least one of these meetings and see first hand the harm gambling does for Starters, and how maintaining the Sinking Fund Policy will help keep our community and families safe from the harm these machines cause. Hopefully this will help all involved in this process make a better informed decision for our community.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(As making the submission, or person authorised to sign on behalf of the Submitter) Dated 19-03-2021

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Submitter/s Details

Full Name: Winifred Tauwhi Tapara
Contact Person: Claire Tapara
Email Address: Winnie.Tapara@gmail.com
(Daytime) 027 284 4523 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.
☐ I/we support the current 'Sinking Lid' Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

As a resident and a rate payer of Otorohanga, families within our area are struggling already. With the Covid 19 has made life struggles harder with redundancy and closures of company's and more people on benefits (WINZ) because of loss of jobs. People are struggling to put food on the table and keep a roof over their heads and being able to keep power on in the house and pay the rates for water Waikato and local. One night out with these pong game machine people have been known to spend rent money food and power money causing broken homes with domestic abuse and separation of parents and children.

I do not support people with gambling addiction or the "Otorohanga District Council" allow more machines in the area.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☐ I/we do not wish to be heard in support of this submission
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Signed ___________________________ Dated 12/3/2

(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: Te Pera Millar-Hetet
Contact Person: 
Email Address: gra122419@gmail.com
Phone Number/s: 0226358063 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

* The harm that more machines will have on the vulnerable.
* Low income families will suffer the consequences
* Harmful gambling
* Goes against the meaning and conception of Ōtorohanga
* The meaning of the name Ōtorohanga
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

I would prefer that Council reconsider lifting the sinking lid policy and rema just that. Consider the welfare of the people over making decisions for business purposes. Protect the vulnerable and provide the Community with a safe and prosperous Township. Those of us on the groundfloor already know the negative effect surrounding this policy change will have.

"Mā pango, mā whero, ka oti te mahi" Through operation of black and red the work will be completed. This proverb is relevant.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ________________ Dated __________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter/s Details

Full Name: MARGARET HINERANGI WERETA

Contact Person: 

Email Address: margaret@whenuakete.co.nz

Phone Number/s: 873-8059 (Daytime) 027-235-8241 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current 'Sinking Lid' Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I support the current "Sinking Lid" Policy, and am strongly against the introduction of Controlled Increase in Venues for gaming machines.

It is harmful to the families of those who play the gaming machines, who can least afford to lose money.

Saying there is plenty of support for the problem gambler is putting the ambulance at the bottom of the cliff. Prevention by not increasing gaming machines is better than the cure.

The community share of profits from gambling far outweigh any benefits returned to the community as a whole.

There are enough other forms of gambling without increasing the supply of gaming machines in Ötorohanga District.

I don't believe that increasing the number of gaming machines in Ötorohanga will necessarily increase the proceeds available to the community. It could well just see a reduction in the use of the Ötorohanga Club gaming machines, in favour of playing publicly available gaming machines.

What proof is there that the sinking lid policy is driving money out of town? Perhaps those who may go to the casino in Hamilton do so because it is an entertaining night out, rather than specifically to go gambling, and there is no proof that the same people would make use of publicly available gaming machines.

Bryan Ferguson has a conflict of interest between being Ötorohanga District Councillor, and past president and current councillor of Clubs NZ, the parent body of the Ötorohanga Club Inc, and past president and life member of Ötorohanga Club Inc.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Retain the current "Sinking Lid" Policy.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed __________________________ Dated 01/04/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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<tr>
<td>Phone Number/s:</td>
<td>07 8737165 (Daytime) 0274769559 (Mobile)</td>
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Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☐ I/we support the current 'Sinking Lid' Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I am not in support of the increase in the number of pokie machines in town. You are targeting the most vulnerable people who can ill afford to be spending money on pokies and having more of them just means more opportunity. It is very easy to say that we can support people with gambling addictions but this is like having an ambulance at the bottom of the cliff. We have enough and as said certainly don't need any more.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed Bev Moloney

(Dated 30.3.2021)

(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

★ It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
★ If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter/s Details

Full Name: Amanda Kiddie
Contact Person: Amanda Kiddie
Email Address: chefmaiko@gmail.com
Phone Number/s: 0278109503 (Daytime), 0278109503 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Gambling is known to entice our vulnerable and needy. The ratio of money given back within the community rarely aligns with what is lost in one's community.

The harm of gambling is often hidden, with the increase of online gambling, this is more than ever before. People will gamble 'no matter what', but we as a community need to minimise the risk of harm.

Maintaining the 'Sinking Lid' policy is the best way to safeguard our community at this time.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

I would like to see our elected member maintain our current policy.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ________________________________ Dated ________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

* email to claire@otode.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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Submitter/s Details

Full Name: Vianni Ward

Contact Person: Vianni Ward

Email Address: ree_gir121@hotmail.com

Phone Number/s: ____________ (Daytime) 0275498664 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☒ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I support the current sinking lid policy because it means there is an opportunity to grow gambling as a business in Ōtorohanga. The increase in machines has a flow on effect that could see increases in social problems that are commonly associated with gambling.

Problem gambling is a serious concern as it well documented that this can impact on areas such as health. Gambling addictions may lead to poverty, poor health outcomes & the impact on families can range from violence to low education.

There can be no beneficial outcomes if this District increased their gaming machines. Social problems outweigh social benefits.
The preferred decision is to maintain the sinking lid policy.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☒ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________  Dated 29/3/2021
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**Class 4 Gambling Venue Policy**

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<tbody>
<tr>
<td><strong>Full Name:</strong></td>
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<tr>
<td>Christopher Seaman</td>
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<td><strong>Contact Person:</strong></td>
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<tr>
<td><strong>Email Address:</strong></td>
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<tr>
<td><a href="mailto:Kamahia123456@gmail.com">Kamahia123456@gmail.com</a></td>
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<tr>
<td><strong>Phone Number(s):</strong></td>
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<tr>
<td>(Daytime) 0220210819 (Mobile)</td>
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<td>Provide the reasons for your submission and policy choice.</td>
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E tautoko ana au i tenei kaupapa tawhiti arā te kaupapa hou 'sinking lid' e kiarā ia iti iho au te tini o ngā mihini petipeti ki roto i te tāuhuroa. Mā tenei kaupapa ka āmihina au ngā whānau e ngārō au ngā pēhia nga runga i a tāuhuroa. He tino ke te kaupapa o kara ō ko te taka, he mā ke ngā mihini hei miro. Mā te naponi.

**Submission statement**

Firstly, I support this proposal, that is, the 'sinking lid' policy that proposes to minimise the amount of pokie machines in our region. This proposal will help our families relieve the burden that is upon all of us. The proposal listed up here (Controlled Increase in Venues) is a harmful one, as it only seeks to increase the number of machines that are detrimental to the community.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

```
E mahia ana ki te kaunihenga kia
papurutia te kaupapa here e iti iho ai
kia tani o nga whakarahi
mahi kia tango i
kia tango rohe.
E tika ana kia wharei te kaunihenga.
```

Advice for Council Decision-making

My wish is for the council to uphold this policy to reduce the amount of pokie machines in our region. It is only right that the council should do this.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed __________________________ Dated __________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Have your say on pokies in Ōtorohanga

Ōtorohanga District Council is seeking feedback on its proposed gambling venues policy for electronic gaming machines, more commonly known as ‘pokies’. The Council’s current policy is a “sinking lid policy” meaning that every time a pokie venue closes, it is not replaced, and the number of venues permitted in that district decreases by one.

Your Council is looking to change this to a “Controlled Increase in Venues” policy. This means anyone wanting to open further pokie venues can apply for a licence to the Department of Internal Affairs (DIA) provided consent is given by the Ōtorohanga District Council in the first instance. The Council will have the discretion to grant a new licence on a case-by-case basis. Given the Council have cited the desire to expand business opportunities, it seems clear their intention is to grant new consents. We think a sinking lid policy should be maintained.

Why is this important?
Currently Ōtorohanga district has 23 machines in two venues. In the 2019 year $977,000 was lost on these machines; that’s over $2,000 daily.

Some people support pokies because the gambling losses are used to fund community groups. By law, 40% of the losses are returned to the community. However, this isn’t always to the community where the money came from. For example, in the 2019 year, only $100, 000 went back to the Ōtorohanga community, from $977,000.

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 general are clustered in areas of the highest deprivation, where people can least afford to lose significant amounts of money.

What needs to happen?
We are asking the Ōtorohanga District Council to continue with a sinking lid policy. That means the Council will refuse any pub or club that applies to host pokies and they cannot move around the district.

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

What do you think? Have your say! Submissions close 19th March 2021.

For full details about the Council’s proposed policy read here: https://www.otodc.govt.nz/home/consultations/

**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 Margaret Last David
Address 19 Tekawa St
Region Ōtorohanga City
Phone* 0279673666 Email* margxwilliams@gmail.com
If representing an organisation: Organisation name
Position/title

Submission
Dear Ōtorohanga District Council,
This submission is regarding proposed changes to the Ōtorohanga District Council’s Class 4 Gambling Venue Policy.
I would like to support maintaining the sinking lid option with no relocations and club mergers:*

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

because: Gambling causes more harm good. We need to protect
our people and image of Ōtorohanga not exploit vulnerable for grants.

Hard copy submissions can be returned to the following addresses:
1. Email a completed submission form to chiire@otodc.govt.nz
2. (NB. This is not a freepost)
Submission Form
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Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

The submission on controlled increase in poker machines

I definitely oppose any relaxation of the existing policy. The reason given is that a percentage of the profits go back to the community. This is totally irrelevant, the levels of money coming back to the community are based on the revenue created from the poker machines, comes from the people that run poker machines.

It is a well known fact that while poker machines are readily available in the community, the community suffers.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ____________________________ Dated 31/3/21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
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Submitter/s Details
Full Name: Adele Phillips
Contact Person: Adele Phillips
Email Address: sandaphillips@xtra.co.nz
Phone Number/s: 07 873 8111 (Daytime) 021 056 562 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.
☐ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

I am strongly against increasing the number of gambling machines limit in Ōtorohanga. We gets small gains from having pokie machines but the harm does not only offset the financial gains. Money should never outweigh the mental health and well being of our residents.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed (Person making the submission, or person authorised to sign on behalf of the Submitter) Dated 29.3.21

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---

**Submitter/s Details**

Full Name: Alan John Talbot George
Contact Person: Alan John Talbot George
Email Address: gamagram@gmail.com
Phone Numbers: 027 611 8906 (Daytime) 027 611 8906 (Mobile)

**Submission On: Class 4 Gambling Venue Policy Review 2020**

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

There is a considerable amount of funding for public good that comes from gambling. True. However, the funding comes from a small base in the community and some of those people are spending money in this way that they cannot afford. If the council genuinely believes that funding should be provided then the funds can be raised across the whole community base by increasing rates.

I would rather businesses coming to Otorohanga based their business plan on offering other services not gambling.

Any increase in venues is likely to negatively impact the present venues rather than create new business.

I hope you will consider my wishes in your voting
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

I would like to see the present policy of a sinking lid remain in place.

☐ Tick here if you are attaching further information or additional pages

**Declaration**

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed: ____________________________ Dated: ______________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter/s Details
Full Name: Sharon Turner
Contact Person: as above.
Email Address: nkoroheke2@gmail.com
Phone Number/s: 027 281 1397 (Daytime) ______________________ (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☒ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

As a resident and ratepayer of Ōtorohanga I support the current “sinking lid” Policy and I encourage the council to maintain and strengthen it.

Extract from PGF fact sheet “Currently Ōtorohanga district has 23 machines in two venues. In the 2019 year $977,000 was lost on these machines; that’s over $2,000 daily.” Some people support pokies because the gambling losses are used to fund community groups. By law, 40% of the losses are returned to the community. However, this isn’t always to the community where the money came from. For example, on the 2019 year, only $100,000 went back to the Ōtorohanga Community, from $977,000.

Pokies are highly addictive machines and are the most harmful form of gambling. An increase in the number of pokies to Ōtorohanga will lead to increases in harm to individuals, families and the community through increased participation in gambling activity and corresponding spend. 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.

My submission is only a small snippet on what is known about gambling harm across Aotearoa. It is time for councils and Government to take a closer look at the relationship between harmful gambling, social disparity and a funding model that enables it.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

The decision I would like the council to make is to maintain the Sinking Lid Policy as this Policy supports the following objectives:
1. Control the growth of gambling
2. Contribute to the minimization of harm caused by gambling

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed
(Person making the submission, or person authorised to sign on behalf of theSubmitter)

Dated 29/3/2021

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Submitter/s Details

Full Name: ________________

Contact Person: ________________

Email Address: ________________

Phone Number/s: 09- ___________ (Daytime) ___________ (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 16 February to 1 April 2021.

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I am writing to oppose the Ótorohanga District Council’s current ‘sinking lid’ policy on pokies machines. Children are unfairly impacted by the negative effects of gambling and each and every member of the council must do all they can to ensure children in the district are protected from these harms. Evidence shows that beyond the financial distress caused by problem gambling, children of problem gamblers suffer from increased likelihood of mental health issues, are more likely to suffer physical violence or abuse and are more likely to go on to be problem gamblers themselves. Under no circumstances can this risk of harm to children be

These negative outcomes are at odds with your vision of a community that’s resilient with a cultural identity and one that supports young and
not be excluded through the relocation of pokies. It places the burden of liaison on those who can
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of theSubmitter)

Dated

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Submitter/s Details

Full Name: Dr John Burton
Contact Person: A/A
Email Address: burtonjardis@outlook.com
Phone Number/s: 07 871 0884 (Daytime) 021 173 151 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

✓ I/we support the current ‘Sinking Lid’ Policy  □ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I am making this submission as the wife of a long-time customer of a gaming machine. I accept that if there were no gaming machines there would be plenty of opportunities for people to gamble, but still gamble. However, I find it hard to justify the practice of further gaming machines in our community. The damage they do outweighs the money that they bring into the community. This money is often coming from the most vulnerable who often can least afford it and does significant damage to them and their families. The machines are often placed in venues where children are close available and they can decrease their ability to control their addiction.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Personally, I would like to see the cessation of all grocery machines. I believe the " lcd" policy is a way to gradually do this.

If the Council wishes to use business grant financial assistance, it should look at how people have contributed so much to the Otorohanga Medical Centre, Bank Health Centre. This was all contributed in a thought through way by genuine people who calculated that it would assist the health centres.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ________________________________ Dated 3/3/12
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter/s Details
Full Name: Katanga Hohepa
Contact Person: Katanga Hohepa
Email Address: Katanga.hohepa@kokintrust.org.nz
Phone Number/s: 021 023 74574 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020
Submissions are invited from 19 February to 19 March 2021.
☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

I am a Manager of Mental Health & Addictions Services within Maniapoto.
I do not support any policy that would increase venues for the business of alcohol or gambling, therefore I urge the council to maintain the current ‘Sinking Lid’ Policy.
Māori & Pacific adults are over-represented in problem gambling prevalence rates.
“Problem gambling is strongly linked to mental health state and disorders.”

Make a decision to maintain the Sinking Lid Policy.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission

☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]
(Dates [Signature])

Dated 12/03/21

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

Privacy Statement

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

* It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
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<table>
<thead>
<tr>
<th>Submitter/s Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Name: TREVOR REYNOLD SKILTON &amp; ALISON JUNE KAY SKILTON</td>
</tr>
<tr>
<td>Contact Person: TREVOR SKILTON</td>
</tr>
<tr>
<td>Email Address: <a href="mailto:tjskilton@slinghot.co.nz">tjskilton@slinghot.co.nz</a></td>
</tr>
<tr>
<td>Phone Number/s: (07) 873 7151 (Daytime) (Mobile)</td>
</tr>
</tbody>
</table>

**Submission On: Class 4 Gambling Venue Policy Review 2020**

Submissions are invited from **19 February to 1 April 2021**.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

(1) Community closure, as expressed by option 1 of Item 124 (Council Agenda 20 October 2020) and recommended for adoption by Council **NOT ACCEPTED**.

(2) Reasons for policy choice elaborated in attached document.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

continue present policy without change.

Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of theSubmitter)

Dated 1 April 2021

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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TRJ & AJK Skilton

Submission to Ōtorohanga District Council 2020 Review of Class 4 Gambling Venue Policy

Pursuant to Special Consultative Procedure (Section 83 Local Government Act, rev. 2014)

This document supports and expands the content of the attached Submission Form required by Council.

Community Desire:
Gambling venues are almost universally located in urban communities – in this case Ōtorohanga and Kawhia. The Ōtorohanga and Kawhia Community Boards provide a voice for their residents in the context of the wider District Council business focus.

The review process commenced with the Group Manager’s report and recommendation (item 124 of District Council Agenda, 20 October 2020) first being presented to the Kawhia and Ōtorohanga Boards. Both Boards adopted the recommendation for no change in the current policy on 25 September and 7 October 2020, respectively. This was the expressed wish of the urban communities.

District Council Resolution:

The District Council, when considering the report, rejected the ‘status quo’ recommendation in favour of the Option 2 policy to allow a controlled increase in venues.

Points recorded that ‘spoke to’ the Option 2 amendment were (paraphrased):
- Those wishing to use gambling machines would go out of town
- Ōtorohanga had no ‘open to public’ gambling venue (the present 18 machines at Otorohanga Club being for members only)
- Opportunity for new venues to have gaming machines
- Status quo impairs opportunities for business growth

These arguments in support of a change from the present policy are weak at best, especially when lined against the recognised deleterious effects of gambling machines on vulnerable population groups such as exist in Ōtorohanga and Kawhia.

Relevant Community Outcomes:

The 2020 report on Gambling Venue Policy has specific aims viz.:
- The Ōtorohanga District is a safe place to live
- Ensure services and facilities meet the needs of the Community
- Foster an involved and engaged Community

In relation to being a ‘safe place’, the Option 2 policy has potential to reduce safety, especially for the economic well-being of vulnerable individuals or population groups. Option 1 does not provide this potential for harm.

In relation to ‘needs’ it should be borne in mind that a need is something that is necessary – a necessity. Gambling facilities are far removed from genuine community needs such as road safety and ‘3 waters’. Clearly, provision of gambling facilities is NOT a community need and the existing policy is the most appropriate way of recognising this.

(continued over page)
In relation to ‘Foster an involved and engaged Community’ it is noted that Section 83 of the Local Government Act 2002 Amendment Act 2014 (Special Consultative Procedure) has been implemented by Council, as is required by law.

Section 83 (c) provides that prescribed information is made ‘as widely available as is reasonably practicable as a basis for consultation’. In this case the required Statement of Proposal was made available at Council’s website, the Council Office and Ōtorohanga and Kawhia Libraries. Presumably local Iwi groups identified as Stakeholders will have been notified directly.

We were not aware of this whole matter until hearing Mayor Baxter being interviewed about the proposed change by Radio NZ on 29 March 2021. The Waitomo News (now King Country News) is Council’s first choice for required public advertising but a search of back editions revealed that a call for submissions had not been advertised.

Not advertising publicly the availability of the Statement of Proposal by the best means reasonably available (King Country News) constitutes a failure to act in full accord with Section 83. Also, by not advertising, the Council failed in its stated aim of fostering an involved and engaged community.

Over the last year Council has ‘consulted’ on three matters – Kiwi House Loan, Dog Control Policy, Older Persons Housing Policy. A search of the newspaper’s back numbers only records advertising of the Dog Control Policy change, on 23 and 28 January 2020.

To achieve Council’s aim of fostering an involved and engaged community we submit that all consultations should be advertised in the local newspaper to advise where relevant information can be obtained.

Community Benefits:

The Gambling Act 2003 Section 3(g) provides for ‘ensuring that money from gambling benefits the community’. This provision is often cited as a beneficial outcome in providing gambling venues.

The Ōtorohanga Club accounts for YE March 2020 demonstrate a local example of such benefits:

<table>
<thead>
<tr>
<th></th>
<th>$1,558,186</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Revenue</td>
<td>$1,558,186</td>
</tr>
<tr>
<td>Revenue from Gaming</td>
<td>$649,452</td>
</tr>
<tr>
<td>Less Direct &amp; Indirect Gaming Costs</td>
<td>$281,986 (including depreciation)</td>
</tr>
<tr>
<td>Less Authorised Purpose Payments</td>
<td>$393,030 (essentially to help offset of other Club costs)</td>
</tr>
<tr>
<td>Available Balance (Deficit)</td>
<td>$25,564</td>
</tr>
</tbody>
</table>

Undistributed gaming funds available from previous years totalling $72,195 were carried forward and allowing for the 2020 year deficit only $46,631 remained for possible distribution to other community activities.

In summary, any funds that could be distributed to the wider community on an annual basis amount to not much!

Conclusion

As citizens in the Ōtorohanga Community for over 49 years we are disappointed by Council’s proposal to amend its Gaming Policy. On a personal note, with 37 years of service to Council, including 27 years of full-time employment in Management and Senior Management positions, it was even more disappointing to learn that the staff recommendation, which reflected both of the Communities desired option for no policy change, was overturned.

Fortunately the Special Consultative Procedure had to be actioned and eventually (almost by default) we learned of the matter. We trust that Council, with further consideration in light of submissions will revert to the best decision by adopting the original recommendation.

Trevor & Kay Skilton
Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

★ It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
★ If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter/s Details
Full Name: Kahurangi Poa
Contact Person: Macaea Hetaet
Email Address: kahurangi.poa@papiara.school.nz
Phone Number/s: 022 643 5924 (Daytime) 027 643 5924 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I was born and raised in Ōtorohanga. Although I live in Papiara all my whānau reside there. Ōtorohanga is my Papatanganga and whānau, where I often return on a regular basis. I am strongly against the change of policy from the current ‘Sinking Lid’ to the Controlled Increase in Venues.

26 years ago I was an active board member of the Oto Rugby Club. During that time there were moves to introduce gaming machines I vehemently opposed this decision as I felt it was detrimental to our players' lives, their families and it would be irresponsible of us to put such a burden onto our club. Thankfully common sense prevailed and the decision was quashed.

I believe the policy change would also be irresponsible and detrimental to our community. The council’s thoughts that it would create economic growth in businesses is a falsehood. Once people are addicted they actually go out of the community because of the shame, to spend their money. The only businesses that will see a rise in growth are

* Family violence
* Marriage counselling
* Debt collecting

Services

* Family violence
* Child poverty
* Mental health services

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Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

The preferred council decision is the current “Sinking Lid” Policy.

In future I would like to see more transparency when you are deciding on issues that will negatively impact on people in the community. By this I am referring to the issue/decision being made available to the public easily, not hidden amongst other areas of your website. The submission form in a format other than a pdf. Hence the reason why I am writing and scanning this submission.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ________________________________ Dated ________________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

* email to govt.n
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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Submitter/s Details

Full Name: SashTree Montgomery.
Contact Person: SashTree Montgomery.
Email Address: sashtreemontgomery@gmail.com
Phone Number/s: (Daytime) 020570236 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current 'Sinking Lid' Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

As a Dom $ breed Otorohanga Women, watching the silent yet harmful problem of gambling take over whanau within the community has been so maema. When putea is put into the machines, and small wins happen yet great loss is present, less money is available. For other members in the whanau. The addiction takes over, whanau are left with less money for kai on the table, less for rent, less for children and or education, and in some cases, no money at all.

The availability of machines does not need to be increased as the problem will no doubt increase too. We are a proud community and would not wish to put a negative stamp on the Otorohanga view.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ______________________ Dated ____________________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submission Form
Otortorhanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: Margaret Joan Walton
Contact Person:
Email Address: kero@kero.co.nz
Phone Number/s: 843 4199 (Daytime) 024 911 2552 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement:

Provide the reasons for your submission and policy choice.

I consider gaming machines generally detrimental to the community. Although they may provide a funding stream for community organisations, I don't believe this outweighs the negative effect of gambling.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Continue with the current "status quo" policy.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ____________________________  Dated _______________

(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter/s Details

Full Name: Elisabeth Marie Cowan
Contact Person: Liz Cowan
Email Address: liz@kamahi.co.nz
Phone Numbers: 0210551818 (Daytime), 0210551818 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☐ I/we support the current 'Sinking Lid' Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

In 2019 over $977,000 was lost on pokies in Ōtorohanga alone - over $2,600 every day. Some people support pokies because the gambling losses are used to fund community groups. By law, 40% of the losses must returned to the community. In the 2019, only $100,000 - ten percent - went back to the Ōtorohanga community from the almost $1 million lost.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

As per the recommendations of the PGF Group I support the current 'sinking lid' policy - this should include the following three provisions:

1. "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.

2. 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.

3. No club mergers. There will be no merging of club pokies under any circumstances".

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated 18/03/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
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<tr>
<td>Full Name: ROTARY ROHAN</td>
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<td>Contact Person: AN AN</td>
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<td>Email Address: evan lié <a href="mailto:rowan@gmail.com">rowan@gmail.com</a></td>
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<td>Phone Number/s: 07 873 0 9 (Daytime) 0274 813849 (Mobile)</td>
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Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

- [ ] I/we support the current 'Sinking Lid' Policy
- [ ] I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

The Rotary Club of Ōtorohanga has supported the 'Sinking Lid' policy for many years. At a meeting on 30/3/2021 a majority of the present voted to continue to support the policy.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 31/03/2021

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
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<tbody>
<tr>
<td>Full Name: Jonathan &amp; Deidre Swartzberg</td>
</tr>
<tr>
<td>Contact Person: Deidre Swartzberg</td>
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<td>Email Address:</td>
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<td>Phone Number/s:</td>
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**Submission On:** Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

- I/we support the current ‘Sinking Lid’ Policy
- I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

Otorohanga District Council

We hereby wish to state that we would not want there to be any further Gambling Venues in Otorohanga. We feel that the financial stability of our community would be at stake, as well as the financial position of families. There is a finite amount of spending capacity in Otorohanga, by adding gambling venues, the funds would just be moved from one area of spending to another, i.e. instead of for family provision, to games of chance to try and make a fast buck.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Dated)

(Person making the submission, or person authorised to sign on behalf of the Submitter)

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<tr>
<td>Submissions are invited from 19 February to 1 April 2021.</td>
</tr>
</tbody>
</table>

☐ I/we support the current 'Sinking Lid' Policy ☐ I/we support the Controlled Increase in Venues

<table>
<thead>
<tr>
<th>Submission Statement</th>
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<tbody>
<tr>
<td>Provide the reasons for your submission and policy choice.</td>
</tr>
<tr>
<td>I believe that most forms of gambling is</td>
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<td>for the</td>
</tr>
<tr>
<td>Least afford</td>
</tr>
<tr>
<td>break</td>
</tr>
<tr>
<td>money</td>
</tr>
</tbody>
</table>
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated /3/30

Please submit your completed form by one of the following means:

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Submitter/s Details

Full Name: Victoria Louisa Maikuku

Contact Person: 

Email Address: maivictori14@gmail.com

Phone Number/s: 0211193905 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☒ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Community Health and Wellbeing

- Following on from a recent Face Book post on 30/03/2021 - “Vote Katrina Christisan...” page. I commented about my concern in terms of ‘Health and Wellbeing’.
- I also wanted to know if the council had conducted enough research into our latest community gambling problems, mental health, crime, violence, and poverty statistics? I would've added references but would like to know what you know.
- What systems do you have in place for informing and educating our community about the effects?
- Are we following the DIA ‘engagement guidelines’ at Council level?
- Has the Council under, ‘Te Tiriti’, effectively consulted with our local Hapu/Iwi about effects, solutions, and cultural beliefs/attitudes to gambling?
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

I would prefer to keep the current policy
I would like my comments in the 'submission statement', to be taken into consideration if they have not already been included in the consultation process.

Think Health and Wellbeing - Think W-holistically - Think community

Kia ora,
I have commented that I do not wish to be heard in support of this submission, as I am not based in Otorohanga for work. If you feel that I should be present, then please send be the information on the day and time so that I can re-arrange my schedule.

Ngaa manaakitanga
Victoria

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed Victoria Maikuku

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Victoria Maikuku

Dated 31 March 2021

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

Privacy Statement

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 Submission Form  
Ōtorohanga District Council:  
Class 4 Gambling Venue Policy  
Pursuant to the Gambling Act 2003  

★ It is important that this form is **completed in full** and that we receive this submission prior to the closing date and time indicated on the Public Notice.  
★ If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

**Submitter/s Details**

Full Name: **REBECCA HARRIS**  
Contact Person: **AS ABOVE**  
Email Address: **bexnav70@gmail.com**  
Phone Number/s: **(Daytime) 0211611388 (Mobile)**  

**Submission On: Class 4 Gambling Venue Policy Review 2020**

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

As a resident of Ōtorohanga I support the current “Sinking Lid” Policy. It has been a successful policy, reducing harm to people and their families. The “Controlled Increase in Venues” Policy I feel would just lead to an increase in temptation to gamble, families suffering and crime to feed on individual addiction to gang gambling.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

I would like the Council to maintain the "Sinking Lid" Policy, as this is the policy that will cause less harm to the community.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]
(Donor making the submission, or person authorised to sign on behalf of the Donor)

Dated 07.03.21

Please submit your completed form by one of the following means:

* email to claire.otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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Őtorohanga District Council:
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Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: MATTHEW WILLIAM ROTCHIKO
Contact Person: AS ABOVE
Email Address: mw.rotschiko@gmail.com
Phone Number/s: 07 5737021 (Daytime) 0210498346 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☒ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I, Matthew Rotchiko, send this form to you in support of the current Sinking Lid Policy. As a resident and ratepayer, I firmly believe that there should not be anymore Gambling Venues introduced to our area as Gambling brings a lot of negativity and harm in the form of addiction, money being spent on machines instead of life’s necessities, time spent away from families.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

These sorts of things lead to poverty, broken families as well as crime to try and make ends meet.

As a voter and rate payer it is important that Council acts in the best interest for me and my family, as well as the community.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed __________________________ Dated 27-3-21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
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Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: Tihua Haerewa

Contact Person: __________________________

Email Address: hae e @ a u d . c o m Otorohanga

Phone Number/s: _________________________ (Daytime)
_______________________ (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Otorohanga, born and bred
‘Sinking Lid policy’

As a single parent of
I am deeply concerned,
among

want + love
boys illness
safety

boy
16.1

was does outcome
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Maintain a sinking lid policy and in the future direction of Otorohanga why can we not be the first town in New Zealand to be pokie free??

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 30.3.21

Please submit your completed form by one of the following means:

★ email to claire@otodc.govt.nz
★ post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
★ delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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* If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

Submitter/s Details

Full Name: Josephine Jane Montgomery

Contact Person: 

Home: 8 Harpers Avenue, Ōtorohanga

Email Address: 

Phone Number/s: (Daytime): 0272586713 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

As a resident + ratepayer of Ōtorohanga I support the current “Sinking Lid” Policy because it has been successful and has led to reduced harm. The Controlled increase in venues policy would lead to more RSA licences, gambling venues certainly a lose/lose situation. An increase in the number of policies will lead to increases in harm to individuals, families + the community through increased participation in gambling activity and corresponding spend.
The council decision I would like council to make is to learn about the harm caused by gambling and to maintain the sinking lid policy as this is the policy that will cause less harm to the community.

As a voter and a ratepayer, it is important that my elected representative vote in the “Best interests” of the people they serve.

☐ Tick here if you are attaching further information or additional pages

**Declaration**

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission

☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 23/3/2021

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

★ It is important that this form is **completed in full** and that we receive this submission prior to the closing date and time indicated on the Public Notice.
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<table>
<thead>
<tr>
<th><strong>Submitter/s Details</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Name: Sharon Jurgen</td>
</tr>
<tr>
<td>Email Address: <a href="mailto:sjurgen@gmail.com">sjurgen@gmail.com</a></td>
</tr>
<tr>
<td>Phone Numbers: (Daytime) 0212742992, (Mobile)</td>
</tr>
</tbody>
</table>

**Submission On:** Class 4 Gambling Venue Policy Review 2020

- [x] I/we support the current ‘Sinking Lid’ Policy
- [ ] I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

I support the current ‘Sinking Lid’ Policy.

As a rate payer and resident for over 50 years in Ōtorohanga, this is a decision that I have taken very seriously. I do not want to see any more pokie machines in Ōtorohanga, because I have seen the harm that they cause families and communities.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

The decision I would like Council to
is to maintain the Sinking Lid

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed _____________________________  Dated _____________________________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter's Details

Full Name: Rawinia Yorke
Contact Person: Rawinia Yorke
Email Address: Rawinia.Yorke@holuritrust.org.nz
Phone Number/s: (Daytime) 027-2319882 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

As a Whānau Pāi Primary Mental Health Support Worker in the Maniapoto rohe including Ōtorohanga I support the Sinking Lid Policy which will control the growth of gambling to minimise harm. Gambling harm is well documented Whānau do not need more gaming venues Communities do not need more gaming venues Return the community relate align as those who contribute the money and are often lose are least able to afford it.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ I support making Policy maintain

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission

☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Dates by making the submission, or person authorised to sign on behalf of the Submitter)

Dated 12/03/21

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

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Submitter/s Details

Full Name: HELE
Contact Person: AS ABOVE
Email Address: chelle.Hana@kotikiristrust.org.nz
Phone Number/s: 0272498557 (Daytime) 0272063754 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current 'Sinking Lid' Policy       ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

I am a Social Worker with Tamariki Ran atahi within te aniapoto ro e u port sinking lid policy as reduces sk & har caused by gaming machines to those in the Ōtorohanga community who are vulnerable. There are enoug social issues already in our communities that families face le a one wana ng to increase Gambling by openi g more gaming venues!
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

"Maintain Sinking Lid Policy"
Reduce, prevent + minimise harm from gambling, including problem gambling

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 12/03/2021

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Submitter/s Details

Full Name: Pania Atia Ngaokoropa
Contact Person: Pania Ngaokoropa
Email Address: pania.ngaokoropa@kokivitrust.org.nz
Phone Number/s: 02033745146 (Daytime) 02102374846 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

As a social worker currently working within the Maruapata Area, I see first hand the harmful effects caused by gambling addiction, and the layers of issues that accompany problem gamblers, poverty, care and protection issues, family violence, crime, homelessness, estranged relationships; the list goes on. An increase in gaming machines would widen a difficult increase in the above social issues, social harm, socially unacceptable.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ____________________________ Dated 15/3/21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

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Submitter's Details

Full Name: N Joyce Griggs-Tamaki
Contact Person: As above
Email Address: nola-griggs-tamaki@xtra.co.nz
0272 (Daytime) 0272 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Research
There is

Ōtorohanga

I am a Nurse working mental health.

Addictions Alcohol gambli
for ex young
to famil  Please No MORE.

Maintain Smoking Ltd Policy

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ____________________________  Dated 12/8/21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter/s Details

Full Name: Geoffrey Alba Richolale

Contact Person: as above

Email Address:

Phone Number/s: 07 871 2879 (Daytime) 021 305 698 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I work as a Community Mental Health Nurse in the region. Research indicates the social harm caused by alcohol abuse and a factor in suicides. That allowing alcohol and gambling venues to increase robs families of money to feed their addictions that Council has a moral obligation to limit them.
Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☑ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed: [Signature]
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated: 12/3/21

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

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Ōtorohanga District Council:
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Submitter/s Details

Full Name: Kealohena Padga
Contact Person: Kealohena
Email Address: Kealohena.padga@KoKiriTrust.org.nz
Phone Number/s: 0212565636 (Daytime) __________________ (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

✓ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

As a AOD Practitioner working in the addictions field & Whānau Ora Well Being field I see the harm gambling causes which include relationship breakdown, depression, suicide, reduced work productivity, job loss, bankruptcy, gambling related crime including family violence, crime committed to finance gambling, drug dealing and other alcohol harm. As there is a ripple effect which extends beyond gamblers but to whānau members, children, employees, friends the whole community.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

This is why I oppose increasing gambling machines in Otorohanga, with small populations, high % of Maori, elderly etc... that you would be increasing gambling harm instead of reducing harm.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 2/3/2021

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

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Submitter/s Details

Full Name: Tia Kingi
Contact Person: Tia Kingi
Email Address: Tia.Kingi@live.com
Phone Number/s: 07040291408 (Daytime) 07040291408 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☒ I/we support the current ‘Sinking Lid’ Policy    ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I support the Sinking Lid Policy as this is the best policy that ensures a reduction in the number of pokie machines. I am a Youth Intact Support Worker and have seen the reality of harm that problem gambling can create for youth within the Ōtorohanga community. The need or urge to gamble can lead to an increase in criminal activity and violence within families as individuals will be sourcing ways to fund the playing of pokie machines.
I would like to see Council maintain the current Sinking Lid Policy, as it is the best approach we currently have in reducing the availability to gamble on pokie machines. As a recently 'returned to Ōtorohanga' resident with my daughters I would like to ensure that is happy and prosperous. I believe more venues/more pokie machines will not align with these community values.

☐ Tick here if you are attaching further information or additional pages

**Declaration**

☒ I/we do wish to be heard in support of this submission

☒ I/we do not wish to be heard in support of this submission

☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature] Dated 12/3/2021

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

---

**Privacy Statement**

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Submission Form
Ōtorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

★ Please note: Submissions will only be accepted via email.
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Submitter/s Details
Full Name: Ruth Ward
Contact Person: 
Email Address: 
Phone Number/s: (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020
Submissions are invited from 19 February to 19 March 2021.
☐ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

I support the current as it is in place to p being issued a more pokie machines coming into the district. I have family who reside in the Ōtorohanga district and DO NOT want to see their future being harmed by the social issues and that ultimately will be created by an increase in gambling.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

The decision I would like Council to maintain the sinking lid with this policy cause harm to the community.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

R. Ward

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 17/3/21

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Submission Form

Otorohanga District Council: Class 4 Gambling Venue Policy
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Submitter/s Details

Full Name: Prayer Anana Kake Muraahi
Contact Person: Prayer Muraahi
Email Address: Prayer.Hohepa@korintrust.org.nz
Phone Number/s: 02702374382 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I am a youth support worker in the Maniapoto rōhe. Our rangatāhī have a lot of stresses of life to manage & are already at a critical stage of their lives. Introducing the possibility of gambling addictions on top of the social issues they may have will cause more harmful stress & anxiety.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Remove and ban all gaming machines.
Communities do not need them!!

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 12/03/21

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Submitter’s Details

Full Name: Nga Bovell-Otini
Contact Person: Nga Bovell-O
Email Address: Ngaoida Bovell-twifo.org

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☑ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

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Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

* No relocations of Class 4 machines allowed

☐ Tick here if you are attaching further information or additional pages

Declaration

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☒ I/we do not wish to be heard in support of this submission

☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated 12/31

(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter/s Details

Full Name: Stewart

Contact Person:

Email Address: 

0210841 (Daytime) 07 578 3680 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☐ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Do not increase in Venues, Controlled or not.

By doing so, you are encouraging and supporting increase in deprivation of Māori and Pacific peoples who are at greater risk of gambling addiction and harm. Why would you wish to add to the stats??
Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

- Minimise gambling harm for priority populations.
- Support health equity.
- Ensure links between public health and intervention services.
- Maintain a focus on improving health outcomes for the Pacific peoples within your region.

☐ Tick here if you are attaching further information or additional pages

**Declaration**

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated ____________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Ötorohanga District Council:
Class 4 Gambling Venue Policy
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Submitter/s Details

Full Name: Mavera Heter

Contact Person: as above

Email Address: mavera. heter@live.com

Phone Number/s: 027 498 4091 (Daytime) 027 498 4091 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

[ ] I/we support the current ‘Sinking Lid’ Policy  [ ] I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

Ötorohanga is the place I call home. Born and bred here, my whānau and I have a deep connection to the town, the people, the community. Writing this submission I speak for my whānau and their whānau, who do not have a voice yet to speak for themselves. I support a total ban to elimination of all Pokie Machines in the Ötorohanga District of ultimately Aotearoa. However as this is not yet an option, my submission supports the "Current Sinking Lid" Policy. For the following reasons:

1. It is currently the only policy that controls the number and location of Non-Casino Class 4 Gambling venues as well as the total number of gaming machines
2. Best approach (currently) in place to reduce the availability to gamble on Pokie Machines
3. Best safeguard (currently) available to reduce harm caused by Pokie machines to those in the community who are most vulnerable

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Submission Form
otorohanga District Council:
Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: Maraea Helet
Contact Person:
Email Address: maraea.helet@live.com
Phone Number/s: 0274984091 (Daytime) 0274984091 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020
Submissions are invited from 19 February to 1 April 2021.
☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

Continued

A policy that continues to make a reduction in the number of pokie machines venues is a good policy. In addition, the returns to the community rarely align with those who contribute the money and are often the least able to afford it. I fail to understand how one person’s hardship should fund a community goal.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

1. Maintain Sinking Lid Policy as it will cause less harm.
2. Lead by example to become the first local government to be "Pokie" free by banning/eliminating Pokie machines.
3. Lobby government to regulate "online" gambling or ideally take it offline.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 1/4/21

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

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Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

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Submitter/s Details

Full Name: 
Contact Person: Jean
Email Address: 
Phone Number/s: 04-875 7209 (Daytime) 

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I am not opposed to gambling per se but consider that polotcs are addictive and are targeted at the most vulnerable section of the community. We have enough social problems in our society without encouraging further issues. As a community we must look to more innovative ways of funding our amenities.

31 MAR 2021
Reg'd by the District Council
Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

- Tick here if you are attaching further information or additional pages

**Declaration**

- I/we do wish to be heard in support of this submission
- I/we do not wish to be heard in support of this submission
- If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated __________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter/s Details

Full Name: Sina Te Aroha Tainefu

Contact Person:

Email Address: sina.tearoha@gmail.com

Phone Number/s: 0224628828 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I support the ‘Sinking Lid’ policy because gambling machines have a major impact on our rangatahi and whānau. I am passionate about ensuring our rangatahi have support in their life by making sure that they have what they need the most. By doing that making sure the Council does not allow any more pokie machines in our community.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

I would like to see Council maintain the current Sinking Lid Policy as a Rangatahi of Ōtorohanga. I want to see young people thrive and flourish and be goal seekers of the world.

Gambling would not allow the young people of today to achieve their goals and aspirations. "māhia te mahi, hei painga mo te iwi" - te pura Herangi.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature] Dated 30/5/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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<tr>
<th>Submitter's Details</th>
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<tbody>
<tr>
<td>Full Name: Waikura Donna Hohepa</td>
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<td>Contact Person: Waikura Hohepa</td>
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<td>Email Address:</td>
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<tr>
<td>Phone Number/s: 027343266  (Daytime)</td>
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<td>Provide the reasons for your submission and policy choice.</td>
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</table>

* I am advocating for whānau that live in the Ōtorohanga district. **No more venues** & **No more pokies** in Ōtorohanga. They are detrimental to the wellness of whānau, hapu & whi.
Get rid of them all together!
Ban pokies from Otorohanga district.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ______________________________ Dated 12/03/2012
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter's Details

Full Name: ____________________________________________

Contact Person: _______________________

Email Address: ___________________________ @ hotmail.com

Phone Number/s: ________________________ (Daytime) ________________________ (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

√ I/we support the current ‘Sinking Lid’ Policy  □ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I am a Whānau Ora navigator within te rohe a Maniapoto. Whānau that I have been involved with are already struggling to make ends meet. Increasing venue numbers of Pokie machines increases the "risk" of gambling harm & addictions. This in turn contributes to neglect of children & family violence. Communities DO NOT NEED Pokies!!
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated 12/3/21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submitter’s Details

Full Name: Sichban Ariana Mariona Hohepa
Contact Person: Sichban Hohepa
Email Address: sichban.hohepa@korimutu.org.nz
Phone Number(s): 027 605 7544 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

✓ I/we support the current ‘Sinking Lid’ Policy  □ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I work in a Primary Health Organisation promoting and advocating wellness for whānau within the Maniapoto rohe, including Ototohanga District.

Allowing more licences for new venues and then pokie machines is not promoting Health & Well being. It maintain the current policy at all costs!
Make the decision
SINKING LID!!

- Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature]
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 12.3.2021

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Submitter's Details

Full Name: Carol Murray

Contact Person: 

Email Address: Expect the best@hotmail.co.nz

Phone Number(s): 02102940017 (Daytime) Same Number (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☑ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

I was a resident and ratepayer for many years and my whānau are all long time residents of Ötorohanga district. The proposal to amend the current “sinking lid” policy in favour of “controlled increase in Venues” policy is absurd. There are enough influences that communities are troubled with alcohol, drugs, mental health and now you are proposing more Gambling!! If you had the community well being at heart why would you propose to increase pokies?
**Advice for Council Decision-making**

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Maintain Sinking lid policy.

☐ Tick here if you are attaching further information or additional pages

**Declaration**

☐ I/we do wish to be heard in support of this submission  
☐ I/we do not wish to be heard in support of this submission  
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed  
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 12/03/2021

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Submitter(s) Details

Full Name: Anne Ashford
Contact Person: Anne Ashford
Email Address: anne.ashford@korivitrust.org.nz
Phone Number(s): 0912376091 (Daytime) 0279666431 (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

☑ I/we support the current 'Sinking Lid' Policy ☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

As a team leader, so mental health for Marae members including Ōtorohanga is particularly concerned. Having harm on Māori is documented and currently. The sinking lid policy is the best approach in preventing a minimising harm to whānau hapū & iwi.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed: ____________________________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated: 12/03/21

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**Submitter/s Details**

Full Name: Paula Cord

Contact Person: 

Email Address: paula@xtra

Phone Number/s: 0272586713 (Daytime) 

**Submission On: Class 4 Gambling Venue Policy Review 2020**

Submissions are invited from 19 February to 1 April 2021.

☑️ I/we support the current ‘Sinking Lid’ Policy ☐ I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

As a resident + ratepayer of Ōtorohanga I support the current “Sinking Lid” policy because it has been successful and has led to reduced harm. The controlled increased in venues policy would lead to more licences, gambling venues, certainly a lose/lose situation. An increased in the number of pokies will lead to increases in harm to individuals, families + the community through increased participation in gambling activity and corresponding spend.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

The decision I would like Council to make is to learn about the harm caused by gambling and to maintain the Sinking lid policy as this is the policy that will cause less harm to the community.

As a voter and a ratepayer it is important that my elected representative vote in the "Best Interests" of the people they serve.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ____________________________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated 23.03.2021

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
* delivery to reception at Ōtorohanga District Council office, 17 Maniapoto Street, Ōtorohanga

Privacy Statement:

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Submission Form

Otorohanga District Council: Class 4 Gambling Venue Policy
Pursuant to the Gambling Act 2003

* It is important that this form is **completed in full** and that we receive this submission prior to the closing date and time indicated on the Public Notice.
* If you have any questions in relation to making a submission, please email claire@otodc.govt.nz

<table>
<thead>
<tr>
<th>Submitter’s Details</th>
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<tbody>
<tr>
<td>Full Name: <strong>Michael John Chapcott</strong></td>
</tr>
<tr>
<td>Contact Person: <strong>Michael Chapcott</strong></td>
</tr>
<tr>
<td>Email Address: <a href="mailto:mychapcott@xtra.co.nz">mychapcott@xtra.co.nz</a></td>
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<td>Phone Numbers:</td>
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Submissions are invited from **19 February to 1 April 2021**.

☐ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

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<td>Provide the reasons for your submission and policy choice.</td>
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**I support the Sinking Lid Policy because I believe gambling has far more detrimental effects on society than the money that may be created in an increase in venues.**

I am having lived in this District for 55 years I am amazed that Elected members on Council would even consider opening the door on this issue thinking it may attract business into Town.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☐ I/we do not wish to be heard in support of this submission
☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated 31.05.2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please submit your completed form by one of the following means:

* email to claire@otodc.govt.nz
* post to Ōtorohanga District Council, PO Box 11, Ōtorohanga 3940
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Submission Form

Otorohanga District Council:

Class 4 Gambling Venue Policy

Pursuant to the Gambling Act 2003

* Please note: Submissions will only be accepted via email.
* It is important that this form is completed in full and that we receive this submission prior to the closing date and time indicated on the Public Notice.
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<tr>
<td>Full Name: Whakarongotai Pevan Christian Hohapa</td>
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<tr>
<td>Contact Person: Whakarongotai Hohapa</td>
</tr>
<tr>
<td>Email Address: <a href="mailto:Whakarongotai.hohapa@twca.ac.nz">Whakarongotai.hohapa@twca.ac.nz</a></td>
</tr>
<tr>
<td>Phone Number/s: 027 225 2368 (Daytime) 027 225 2368 (Mobile)</td>
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</tbody>
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Submission On: Class 4 Gambling Venue Policy Review 2020

✓ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

* The current policy has been successful in reducing the number of gaming machines operating in the District.
* Maintain the current policy as it has reduced the risk of gambling harm.
* Maintain the current policy as it better aligns with the relevant community outcome being Otorohanga District is a safe place to live.

Ref. Item 124 - Review of Gambling Venue Policies

Otorohanga District Council Website

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Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

Make the decision to maintain sinking lid policy!

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
☒ I/we do not wish to be heard in support of this submission

☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed [Signature] Dated 18/03/2021
(Person making the submission, or person authorised to sign on behalf of the Submitter)

Please email your completed form to claire@otodc.govt.nz. No paper submissions will be accepted.

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Class 4 Gambling Venue Policy
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Submitter's Details

Full Name: Aperehama Tui Hohepa
Contact Person: Aperehama Hohepa
Email Address: 
Phone Number(s): 027 273 8542 (Daytime) (Mobile)

Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 19 March 2021.

✔ I/we support the current ‘Sinking Lid’ Policy □ I/we support the Controlled Increase in Venues

Submission Statement

Provide the reasons for your submission and policy choice.

on whānau. It’s addictive nature can create financial stress and relationship problems for the whole whānau - not only those who have the problem of gambling. Support the whānau, hapu & iwi of
Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

☐ I/we do wish to be heard in support of this submission
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☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ___________________________ Dated __________
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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Submission On: Class 4 Gambling Venue Policy Review 2020

Submissions are invited from 19 February to 1 April 2021.

☑ I/we support the current ‘Sinking Lid’ Policy  ☐ I/we support the Controlled Increase in Venues

Submission Statement
Provide the reasons for your submission and policy choice.

We believe the potential harm pokies can cause individuals and whānau is greater than potential returns to our community by a controlled increase in venues.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

Declaration

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☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed ________________________________  Dated 1/4/21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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**Submitter/s Details**

Full Name: Shirley Wilson
Contact Person:
Email Address: shirley.willison21@gmail.com
Phone Number/s: (Daytime) 0224384260 (Mobile)

**Submission On: Class 4 Gambling Venue Policy Review 2020**

Submissions are invited from **19 February to 1 April 2021**.

☐ I/we support the current ‘Sinking Lid’ Policy
☐ I/we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

As a social worker, I have seen the impact problem gambling has on the whānau including the children. Problem gambling becomes normalised for the children who often witness a parent or adult Thal gamble. Finances within the whānau become strained, point where assistance is needed. It becomes an addiction & people are drawn to the lights, bells & made by the machines.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

☐ Tick here if you are attaching further information or additional pages

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☐ If others make a similar submission, I/we would like to consider presenting a joint case with them at the hearing.

Signed: [Signature]

(Person making the submission, or person authorised to sign on behalf of the Submitter)

Dated: 1-4

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**Submitter/s Details**

- **Full Name:** Timbara Jones
- **Contact Person:**
- **Email Address:** barb.tim*j@9gile.com
- **Phone Number/s:** 027 302 4981 (Daytime) __________________________ (Mobile)

**Submission On:** Class 4 Gambling Venue Policy Review 2020

**Submissions are invited from 19 February to 1 April 2021.**

☑ If we support the current ‘Sinking Lid’ Policy
☐ If we support the Controlled Increase in Venues

**Submission Statement**

Provide the reasons for your submission and policy choice.

In 2019 almost $1,000,000 was lost to poker machines in our district. The law states 40% of this money should be returned to our community, yet only $100,000 came back. Not much benefit to the community.

But much more important to us, is that pokies are highly addictive machines, almost 50% of people who seek help for their gambling use pokies outside of casinos. And we understand it is estimated 30% of money lost on pokies comes from people who can least afford it.

We believe it is immoral that poker machines are deliberately placed in areas of high deprivation, and we would like our Council to look the way in ensuring our community have less of these machines, not more.
Advice for Council Decision-making

Provide details of the preferred Council decision, including the nature of any conditions you would like to see imposed.

A true sinking lid policy on policy, that includes TAB venues with no relocations and no mergers.

☐ Tick here if you are attaching further information or additional pages

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Signed ________________________________ Dated 1.4.21
(Person making the submission, or person authorised to sign on behalf of the Submitter)

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