

# AGENDA

Extraordinary Meeting of the  
**Buller District Council**

**Commencing at 3:30pm**  
**Wednesday 13 November 2024**

*To be held at the*  
Clocktower Chambers  
Palmerston Street  
Westport



## CORE COUNCILLOR ROLE AND RESPONSIBILITIES

The Governance role entails:

- Strategic planning and decision-making;
- Policy and strategy review;
- Community leadership and engagement, and stewardship;
- Setting appropriate levels of service;
- Maintaining a financially sustainable organisation; and
- Oversight/scrutiny of Council's performance as one team.

The governance role focusses on the big picture of 'steering the boat' - management's role focusses on 'rowing the boat'

Our commitments to best support each other and meet the challenges and opportunities of 2024 include:

### CLEAR AND RESPECTFUL COMMUNICATION

We are committed to:

Actively listening and not interrupting;

Remaining conscious of 'tone', body language, and amount of time speaking (allowing time for others);

Responding/answering in a timely manner; and

Being honest, reasonable, and transparent.

### TRUST AND RESPECT

We recognise that trust and respect must be earned and that a team without trust isn't really a team. Trust can be built by:

Valuing long-term relationships; being honest; honouring commitments; admitting when you're wrong; communicating effectively; being transparent; standing up for what's right; showing people that you care; being helpful; and being vulnerable.

### CONTINUOUS LEARNING AND IMPROVEMENT

Continuous learning and improvement are critical for growing together as a team.

We are committed to constantly reviewing what is going well and what needs to improve in relation to the way we work together, the processes we follow, and the outcomes we deliver.

NONE OF US IS AS SMART AS ALL OF US

# Council

<b>Chairperson:</b>	<b>Mayor</b>
<b>Membership:</b>	The Mayor and all Councillors
<b>Meeting Frequency:</b>	Monthly – or as required.
<b>Quorum:</b>	A majority of members (including vacancies)

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## Purpose

The Council is responsible for:

1. Providing leadership to, and advocacy on behalf of, the people of Buller district.
2. Ensuring that all functions and powers required of a local authority under legislation, and all decisions required by legislation to be made by local authority resolution, are carried out effectively and efficiently, either by the Council or through delegation.

## Terms of Reference

1. To exercise those powers and responsibilities which cannot legally be delegated by Council:
  - a) The power to set district rates.
  - b) The power to create, adopt and implement a bylaw.
  - c) The power to borrow money, or purchase or dispose of assets, other than in accordance with the Long Term Plan.
  - d) The power to adopt a Long Term Plan or Annual Plan, or Annual Report.
  - e) The power to appoint a Chief Executive Officer.
  - f) The power to adopt policies required to be adopted and consulted on under the Local Government Act 2002 in association with the Long Term Plan, or developed for the purpose of the Council's governance statement, including the Infrastructure Strategy.
  - g) The power to adopt a remuneration and employment policy for Chief Executive Officer.
  - h) The power to approve or change the District Plan, or any part of that Plan, in accordance with the Resource Management Act 1991.
  - i) The power to approve or amend the Council's Standing Orders.
  - j) The power to approve or amend the Code of Conduct for Elected Members.
  - k) The power to appoint and discharge members of committees.
  - l) The power to establish a joint committee with another local authority or other public body.
  - m) The power to make the final decision on a recommendation from the Parliamentary Ombudsman, where it is proposed that Council not accept the recommendation.
  - n) Health & Safety obligations and legislative requirements are met.

2. To exercise the following powers and responsibilities of Council, which the Council chooses to retain:
- a) Resolutions required to be made by a local authority under the Local Electoral Act 2001, including the appointment of an electoral officer and reviewing representation arrangements.
  - b) Approval of any changes to Council's vision, and oversight of that vision by providing direction on strategic priorities and receiving regular reports on its overall achievement.
  - c) Adoption of governance level strategies, plans and policies which advance Council's vision and strategic goals.
  - d) Approval of the Triennial Agreement.
  - e) Approval of the local governance statement required under the Local Government Act 2002.
  - f) Approval of a proposal to the Remuneration Authority for the remuneration of Members.
  - g) Approval of any changes to the nature and delegations of the Committees.
  - h) Approval of funding to benefit the social, cultural, arts and environmental wellbeing of communities in Buller District
  - i) Ensuring Buller is performing to the highest standard in the area of civil defence and emergency management through:
    - i) Implementation of Government requirements
    - ii) Contractual service delivery arrangements with the West Coast Regional Group Emergency Management Office
  - j) All other powers and responsibilities not specifically delegated to the Risk and Audit Committee, subcommittees, independent hearing panels or Inangahua Community Board.



# Buller District Council Extraordinary Meeting



Venue: Clock-tower Chambers, Westport. This meeting will be Live-Streamed on the Buller District Council YouTube Channel.

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**BULLER DISTRICT COUNCIL**

**EXTRAORDINARY MEETING**

**13 NOVEMBER 2024**

**AGENDA ITEM: 1**

**Prepared by** Simon Pickford  
Chief Executive Officer

**APOLOGIES**

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**1. REPORT SUMMARY**

That Buller District Council receive any apologies or requests for leave of absence from elected members.

**2. DRAFT RECOMMENDATION**

**That there are no apologies to be received and no requests for leave of absence.**

**OR**

**That Buller District Council receives apologies from (insert councillor name) and accepts councillor (insert name) request for leave of absence.**

**BULLER DISTRICT COUNCIL  
EXTRAORDINARY MEETING**

**13 NOVEMBER 2024**

**AGENDA ITEM: 2**

**Prepared by** Simon Pickford  
Chief Executive Officer

**MEMBERS INTEREST**

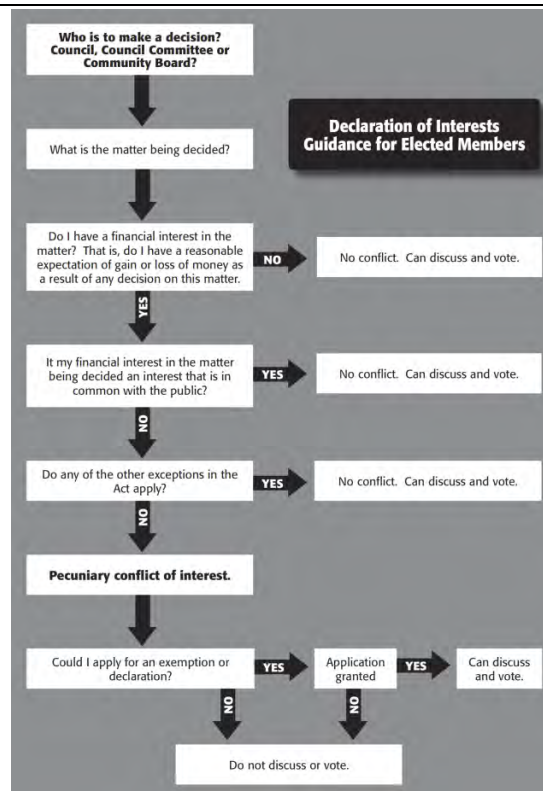
Members are encouraged to consider the items on the agenda and disclose whether they believe they have a financial or non-financial interest in any of the items in terms of Council's Code of Conduct.

Councillors are encouraged to advise the Governance Secretary, of any changes required to their declared Members Interest Register.

The attached flowchart may assist members in making that determination (Appendix A from Code of Conduct).

**DRAFT RECOMMENDATION:**

**That Members disclose any financial or non-financial interest in any of the agenda items.**



**BULLER DISTRICT COUNCIL**

**EXTRAORDINARY MEETING**

**13 NOVEMBER 2024**

**AGENDA ITEM: 3**

**Prepared by** Tarsha Armstrong  
Compliance and Licensing Inspector

**Reviewed by** Michael Aitken  
GM Regulatory Manager (Interim)

**Attachments**

1. Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy – Buller District Council.
2. Application for Territorial Authority consent for class 4 gaming venue from The Trust Community Foundation Limited.
3. Submissions received to The Trust Community Foundation Limited application.
4. Officer's Report on The Trust Community Foundation Limited application.

**Public Excluded:** No

**APPLICATION BY COSMOPOLITAN HOTEL, WESTPORT UNDER BULLER DISTRICT COUNCIL CLASS 4 GAMBLING AND TOTALISATOR AGENCY BOARD (TAB) VENUE POLICY**

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**1. REPORT SUMMARY**

This covering report outlines the application under the Class 4 Gambling and Totalisator Agency Board (TAB) Policy ('the Policy'), received from Paul Adams on behalf of The Trust Community Foundation Limited (Ltd) for the Cosmopolitan Hotel. As provided for under the Policy Council will hear from the applicant and those who made submissions today. Deliberations considering the officer's report, the application and all submissions will be undertaken before making a decision.

This covering report and attached officer's report (**Attachment 4**) outlines the application, objections and policy considerations for Council.

## 2. DRAFT RECOMMENDATION

That Council:

- a. Receives this report and accompanying officer's report.
- b. Considers the application by The Trust Community Foundation Limited to operate a further three gaming machines at the Cosmopolitan Hotel, 136 Palmerston Street, Westport.
- c. Considers all the submissions received to the application; and
- d. Either:
  - i. Grants the application by The Trust Community Foundation Ltd for the addition of three new machines to the Class 4 gambling venue at the Cosmopolitan Hotel in Westport: OR
  - ii. Declines the application by The Trust Community Foundation Ltd for the addition of three new machines to the Class 4 gambling venue at the Cosmopolitan Hotel in Westport.

## 3. ISSUES & DISCUSSION

### BACKGROUND

As required under legislation, Council has a Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy (the Policy). Under that Policy new gambling venues and new gambling machines are subject to an application being made to, and considered by, Council. The Policy is attached as **Attachment 1**.

The application must be publicly notified, and submissions/objections are invited from the public. As noted above, decisions on applications are made by Council following a hearing at which the applicant, and everybody who has made a written submission on the application, can be heard.

### Application and Submissions

The Trust Community Foundation Ltd has made an application (**Attachment 2**) for an additional three gaming machines on their premises at the Cosmopolitan Hotel at 136 Palmerston Street, Westport. The venue currently has permission to operate six gaming machines, the additional number bringing the total to nine if the application was to be approved.

Five submissions (all in opposition) were received to the application (**Attachment 3**):

- Trevor Wilson
- Vince Barry of Te Whatu Ora
- Ross Bradley
- Kristy Kang of PGF Group
- Nel van Greevenbroek of Buller Budget Advisory Service Incorporated

A full report covering the matters to be considered under the policy is attached in the accompanying officer's report (**Attachment 4**).

#### **4. CONSIDERATIONS**

##### **4.1 Strategic Impact**

Consideration of this application is made under the criteria outlined in the Council's Class 4 Gambling and TAB Venue Policy.

##### **4.2 Significance Assessment**

The application does not meet the threshold criteria of the Significance and Engagement Policy.

##### **4.3 Risk Management Implications**

This decision does not provide Council with a significant risk as Council is following all the requirements for consideration of an application under its Class 4 Gambling and TAB Venue Policy.

Public notification of the application has been undertaken as required under the Policy.

##### **4.4 Values**

This decision will be made with consideration to the Policy that the Buller District Council has adopted. These align with the Buller District Values of being Community Driven together with One Team, Future Focused, Integrity and We Care.

##### **4.5 Policy / Legal Considerations**

As noted above this decision will be made in accordance with the criteria set out in Council's Class 4 Gambling and TAB Venue Policy.

It is noted that the policy is currently under review with the first stage of public consultation having been undertaken. Submitters to the policy review will be heard at this meeting. Council will then decide on the direction a draft policy will take including the following options:

- Status Quo;
- Capped approach; or
- Sinking lid

#### **4.6 Tangata Whenua Considerations**

The decision does not involve a significant decision in relation to ancestral land or a body of water or other elements of intrinsic value, therefore this decision does not specifically impact Tangata Whenua, their culture and traditions.

It is noted statistics show that Māori are disproportionately impacted by gambling and are 3.13 times likely to experience gambling harm compared with non-Māori.

In 2018, Statistics New Zealand summarised that 11.2% of Buller's population are Māori.

#### **4.7 Views of Those Affected**

As required by the Policy public notification of the application was made and the opportunity to make objections/submissions was outlined in the public notices. Public notices were placed in the local newspaper and on Council's website twice within the time periods set out in the policy.

Five submissions were received, and all were in opposition to the application.

Of the five, two were from the Buller area (a member of the public and Buller Budget Advisory Service), two from organisations (Te Whatu Ora and Problem Gambling Foundation), and one from a member of the public who resides in Auckland.

#### **4.8 Costs**

There is no financial implication relevant to this decision.

#### **4.9 Benefits**

Council is making this decision based on the Class 4 Gambling and TAB Venue Policy which outlines the matters which may or may not benefit the community in making this decision. These matters are set out in the officer's report Attachment 4.

#### **4.10 Media / Publicity**

This decision may attract media interest which will be managed by the Council's Communication's team.



## CLASS 4 GAMBLING AND TOTALISATOR AGENCY BOARD (TAB) VENUE POLICY

<b>Source:</b>	Council		
<b>Date:</b>	23/09/2009		
<b>Reviewed:</b>	30/06/2015	<b>Next review:</b>	30/06/2018
<b>See also:</b>	Gambling Act 2003, Racing Act 2003		

### PURPOSE

To manage the establishment of Class 4 gambling and TAB venues to minimise the adverse effects of gambling on the Buller district.

### BACKGROUND

This policy applies to Class 4 and Totalisator Agency Board (TAB) gambling, and to Class 4 gambling and TAB venues.

**Class 4 gambling** is gambling that involves the use of gaming machines outside a casino, and from which the profits are distributed to authorised purposes (i.e. back to the community).

**Class 4 venues** are the licenced premises where gaming machines are located.

**TAB venues** are premises that are owned or leased by the New Zealand Racing Board and where the main business carried on at the premises is providing racing betting or sports betting services under the Racing Act 2003.



## **COUNCIL CONSENT FOR CLASS 4 GAMING MACHINES AND TAB VENUES**

Consent is required from Council for the following:

- To establish a new Class 4 venue.
- To increase the number of gaming machines at an existing Class 4 venue to more than the number operating at that venue on 22 September 2003, or more than the number previously consented to by Council.
- To establish a new TAB venue.
- The first time application is made to the Department of Internal Affairs for a Class 4 venue licence for a venue which did not hold such a licence on 17 October 2001.

Any building which holds a venue consent and which is destroyed or damaged by fire or other hazard may have that consent re-approved without further public notification. Such re-approval will not apply to any relocation of venue.

## **KEY ISSUE ONE**

There are some recognised benefits from allowing Class 4 and TAB gambling. A number of community groups rely on funding from the proceeds of Class 4 gambling. Some members of the community derive entertainment from these forms of gambling, and participate in them responsibly.

## **OBJECTIVE**

To allow those who wish to participate in gaming machine and TAB gambling to do so within the district.

## **POLICY**

Class 4 gambling venues and TAB venues may be established in Buller subject to:

1. Meeting application and fee requirements;
2. The primary activity of the premises being onsite entertainment, recreation, or leisure focused on persons 18 years and over; and

3. The premises being authorised under the Sale and Supply of Alcohol Act 2012 to sell and supply liquor for consumption on the premises.

## **METHOD OF IMPLEMENTATION**

Applications for Council consent must be on the approved form and must provide:

1. Name and contact details for the application;
2. Street address of premises proposed for the venue;
3. A site plan covering both gambling and other activities proposed for the venue, including details of each floor of the venue and location of each gaming machine or TAB;
4. Details of the proposal including the number of gaming machines or other gambling facility;
5. Details of liquor licence(s) applying to the premises; and
6. Any relevant gambling harm minimisation policy.

Application fees for territorial authority consent will be set annually as part of the Annual Plan process.

The applicant is responsible for meeting the cost of publicly notifying the application.

Applications will not be considered until all of the required information has been received and the application fee has been paid. Council may request additional information if it considers it necessary to making a decision on an application.

## **EXPLANATION/REASONS**

By allowing Class 4 and TAB venues to establish in Buller, we are allowing those who wish to participate in these types of gambling to do so.

By specifying the types of premises which are suitable to be Class 4 and TAB venues, and by requiring applicants for consent to provide detailed information about their proposal

before a decision is made on their consent allows us to minimise the potential for adverse effects arising from gambling.

## **KEY ISSUE TWO**

There is the potential for gambling to cause harm to individuals, and the community as a whole, especially in cases of problem gambling.

## **OBJECTIVE**

To prevent and minimise the harm caused by gambling, including problem gambling.

## **POLICY**

The maximum number of gaming machines allowed at Class 4 venues are as follows:

- Class 4 gambling venues licenced after 17 October 2001 shall be allowed a maximum of nine gaming machines.
- Class 4 gambling venues licenced before 17 October 2001 shall be allowed a maximum of 18 gaming machines.

## **METHODS OF IMPLEMENTATION**

No single venue will be allowed to exceed the maximum number of gaming machines.

When considering an application for consent, Council will have regard to the characteristics of the venue and may impose a maximum number on the consent that is less than the applicable maximum number above.

## **EXPLANATION/REASONS**

Restricting the number of gaming machines that may operate in the district limits the opportunities people have to gamble. Limiting gambling opportunities will help prevent and minimise harm from gambling.

Restricting the types of venues which can be Class 4 venues will assist in the identification of problem gamblers, as they will become recognisable to venue staff. Identifying that somebody has a gambling problem is the first step in preventing harm caused by problem gambling.

### **KEY ISSUE THREE**

Council has a responsibility under the Gambling Act 2003 and the Racing Act 2003 with regards to the provision of Class 4 gambling and TAB venues in the district.

### **OBJECTIVE**

To ensure the Council and the community has influence over the provision of new gambling venues within the district and additional opportunities for gambling at existing venues.

### **POLICY**

In considering all applications relating to Class 4 gambling venues Council may consider any matter, but will consider the following:

- (i) Characteristics of the district and parts of the district.
- (ii) Locations of kindergartens, early childhood centres, schools, places of worship and other community facilities.
- (iii) The number of gaming machines that should be permitted at any venue.
- (iv) The cumulative effects of additional opportunities for gambling in the district.
- (v) How close any venue shall be permitted to any other venue.
- (vi) What the primary activity at any venue is.

In considering all applications relating to TAB venues Council may consider any matter, but will consider the following:

- (i) Characteristics of the district and parts of the district.
- (ii) Locations of kindergartens, early childhood centres, schools, places of worship and other community facilities.
- (iii) The cumulative effects of additional opportunities for gambling in the district.

#### **METHODS OF IMPLEMENTATION**

The decision on Council consents will be made by full Council following a hearing at which the applicant and everybody who has made a written submission on the application will have the opportunity to be heard.

When considering the cumulative effects of additional opportunities for gambling in the district for Class 4 venues, Council will take into account both the number of gaming machines currently operating, and the number of gaming machines currently able to operate.

#### **EXPLANATION/REASONS**

Ensuring Council considers the listed matters when determining all applications for consent will help ensure that Council has influence over the establishment of new Class 4 venues and over the provision of additional gaming machines at existing venues, when the resulting number of machines will be greater than the number the venue is currently able to operate.

This will also help ensure that Council exercises its influence consistently across all applications for consent.

Requiring that consideration be given to public submissions, both written and as presented at hearings, will help ensure that the views of the community are taken into account when Council makes decisions on consents.

#### **KEY ISSUE FOUR**

The impacts of both the benefits and the harm resulting from gambling are felt by the community.

#### **OBJECTIVE**

To facilitate community involvement in decisions about the provision of gambling.

#### **POLICY**

All applications for Council consent will be available for public submission.

Submitters will have the opportunity to speak to their submission at the hearing of the consent application.

In making their decision Council will give consideration to all submissions received.

#### **METHODS OF IMPLEMENTATION**

All applications will be twice publicly notified in a newspaper circulating in the area to which the application relates. Notifications will be placed at least seven days apart, but no more than 14 days apart. Council staff will be responsible for placing the public notifications.

The public notifications will advise people of the opportunity to make a written submission on the application.

Copies of the application will be made available at Council offices, Buller libraries and on Council's website. Information will be included on the opportunity to make a written submission.

## EXPLANATIONS/REASONS

Community feelings on gambling range from full support to total opposition.

Supporters of gambling often note the following benefits:

- The money distributed to community groups and organisations from the proceeds of Class 4 gambling.
- The entertainment value of responsible gambling.

Opponents of gambling often note the following harmful effects of gambling:

- The amount of money spent and lost by gamblers.
- Problem gambling and the impact this has on the life of the gambler, their family and the community as a whole.

Giving all members of the community the opportunity to comment on applications for consent to create additional gambling opportunities will help ensure that the full range of opinions and issues are heard and taken into account when Council makes its decision on an application.



**APPLICATION FOR TERRITORIAL AUTHORITY CONSENT**  
**CLASS 4 GAMBLING VENUE**  
 Section 99 of the Gambling Act 2003

Name: PAUL AOAMS  
 Organisation or Trust: THE TRUST COMMUNITY FOUNDATION LTD  
 Contact Address: [REDACTED]  
[REDACTED]

Contact Phone: \_\_\_\_\_

Email Address: \_\_\_\_\_

Name & Street Address of premises proposed for the Class 4 Licence:

COSMOPOLITAN HOTEL  
136 PALMERSTON STREET  
WESTPORT 7825

The primary activity of this venue is: HOTEL

Signature: [REDACTED]

Application is made for consent for a gambling venue to incorporate the following:

Number of existing Gaming Machines located at premises: 6

Number of new or additional Gaming Machines proposed: 3

Please enclose the following with the application:

- ☐ A site plan covering both gambling and other activities proposed for the venue including details of each floor of the venue and location of gaming machines or TAB
- ☐ Details of liquor licence(s) applying to the premises
- ☐ Deposit of \$250.00\*
- ☐ Locations and distances from the nearest gaming venue, kindergarten, early childhood centres, schools, places of worship and other community facilities
- ☐ Any relevant gambling harm minimisation policy

\* Please note this is a deposit only and Council operates on a full cost recovery system. If the cost of processing this application is more than the deposit the applicant will be charged the additional amount. The applicant is also responsible for meeting the cost of publicly notifying the application.

The personal information that you provide in this form will be held and protected by Buller District Council in accordance with our privacy policy (available at [bullerdc.govt.nz/privacy](http://bullerdc.govt.nz/privacy) and at council libraries and service centres) and with the Privacy Act 2020. Council's privacy policy explains how we may use and share your personal information in relation to any interaction you have with the council, and how you can access and correct that information. We recommend you familiarise yourself with this policy





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www.bullerdc.govt.nz • www.westcoast.co.nz  
Buller District Council

AL 016A  
petaj 30/09/15

Licence No:  
Decision:  
Buller DLC ref:

54/TA/001/2024  
DLC/097/2024  
TA24001

### **TEMPORARY AUTHORITY ORDER**

*Sale and Supply of Alcohol Act 2012 – Section 136*

Pursuant to the Sale and Supply of Alcohol Act 2012, an Order is hereby made whereby DJ 14 Limited is authorised to sell and supply alcohol on the premises situated at **136-138 Palmerston St, Westport** and known as "**Cosmopolitan Hotel**" to any person for consumption on the premises and to let people consume alcohol there.

This order is subject to the following conditions:

1. Ensure that the current off-licence remains in force for the term of the Order and that any annual fees due during this time are paid.
2. Comply with the same duties, conditions, obligations and liabilities as required by the current on licence 54/ON/011/2020.
3. Comply with the conditions of the Order.

This order commences on 17/06/2024 and shall expire on 17/09/2024 unless a substantive licence has been issued prior to the expiry date.

**DATED** at Westport this 17th day of mJune 2024.

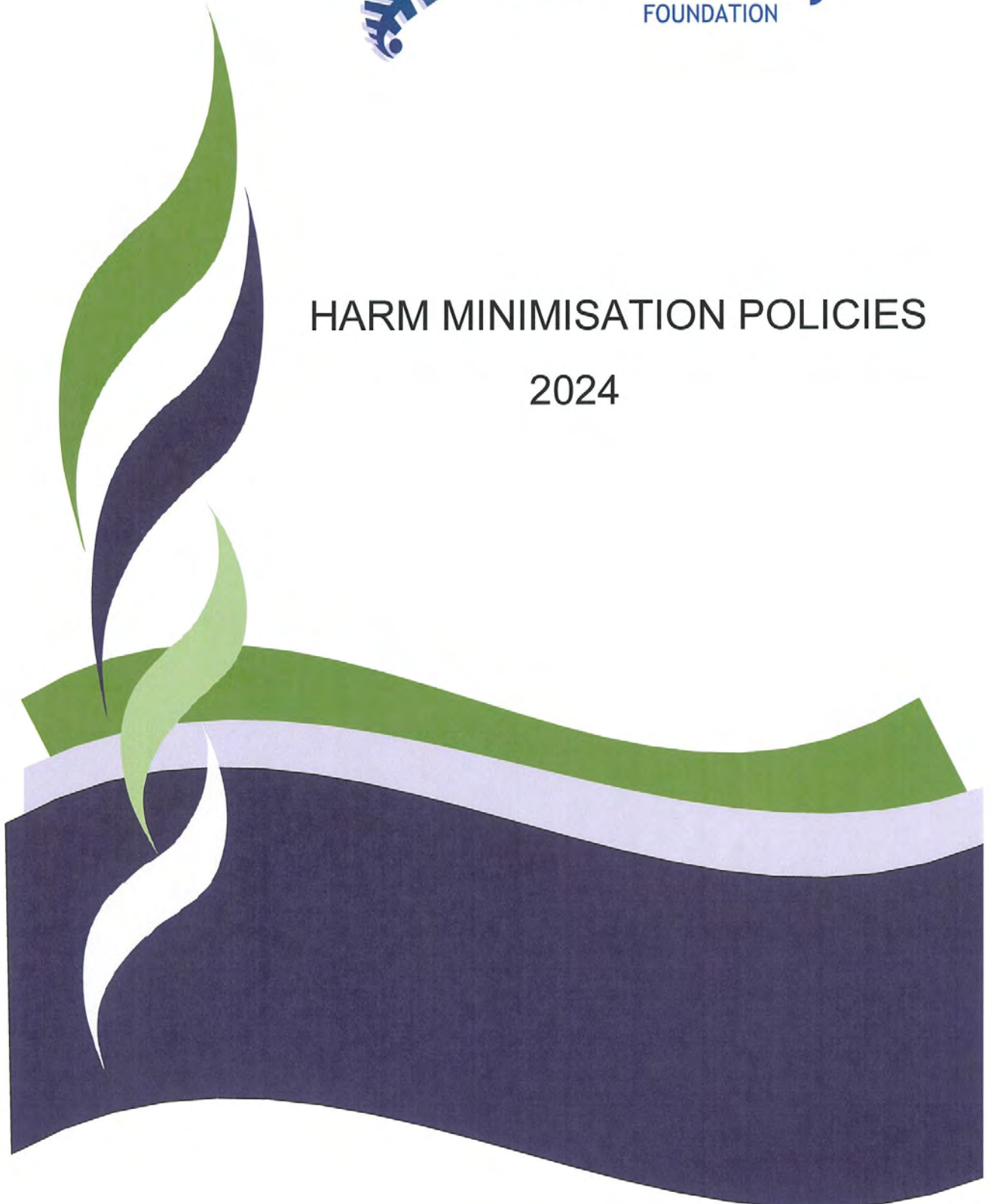
Nathan Riley  
**SECRETARY**  
**BULLER DISTRICT LICENSING COMMITTEE**

#### Notes:

1. Any order or subsequent order is subject to the underlying licence being valid for the period of the order.
2. This order shall be displayed prominently at the principal entrance to the premises.



# HARM MINIMISATION POLICIES 2024



## Introduction

Class 4 Gambling is looked upon as just another form of entertainment for most people, however it is openly acknowledged that there are some who do find it difficult to keep within acceptable limits and therefore will experience negative outcomes as a result of their gambling. Sadly, it affects their families and friends in many instances as well.

The Trusts Community Foundation, hereafter referred to as TTCF and/or this Foundation, is totally accepting of the fact that every Class 4 Gambling society has a role to play in developing a set of policies that will assist venue personnel meet their obligations in terms of harm prevention, firstly by being able to identify signs of harm and secondly having the knowledge and skills to deal with each situation.

The 2023 version of the Gambling (Harm Prevention and Minimisation) Regulations 2004 have dramatically upped the ante in terms of the regulatory obligations for Class 4 Gambling societies, Venue Operators and in particular Venue Managers.

## Current Strategies

- Each venue is provided with a comprehensive Resource Kit that contains all the items listed in **Appendix 1**.
- An online Training Module was developed in 2021. It was designed primarily as a basic education process for inductees and so provides a general overview for any new employee that is designated to play a role in supervising the gaming machine operation at a venue. In recent times all venue personnel were encouraged to undergo the training process for a second time as a refresher. The uptake was almost 100% which was rather gratifying.
- Area Managers have provided face to face training, both as a follow up to the online process as well as ensuring that key personnel are brought up to speed with any new sector related developments e.g., before and after the new Regulations came into effect on December 1<sup>st</sup>, 2023

## Future Strategies

- A second online training module is currently under development. It is scheduled to be completed by 30<sup>th</sup> June 2024, with the intention that key venue personnel have undergone this part of their training by 1<sup>st</sup> August 2024. The primary focus of this module is all aspects of harm prevention.
- Area Managers will provide face to face training, both as a follow up to the online process as well as ensuring that key personnel are brought up to speed with any new sector related developments on an ongoing basis.
- TTCF plans on developing and introducing further online training modules in the future.

### **Ongoing Venue Support**

- Provide all venue personnel associated with supervising the gaming machine operation with the necessary harm prevention and minimisation related training as soon as practicably possible after they take over the business and/or commence employment. This will start with the induction module and shortly thereafter the harm prevention module.
- Area Managers will provide follow up face to face training. All training interactions at each venue will be entered into a Training Register for future reference.
- The TTCF Administration Office will continue to proactively contact every venue operator at least once a month to check whether there are any new staff members that require training and/or any existing personnel who feel they need some additional training. Area Managers also check on general training needs as part of their call cycle visits.
- Area Managers conduct regular compliance assessments at each venue, with a particular emphasis on ensuring that:
  - a) Venue Operators, Venue Managers and key personnel are taking their harm minimisation obligations seriously, particularly when it comes to identifying any person that is displaying the signs and then dealing with the situation appropriately.
  - b) Gaming Room Sweep Reports and Incident Registers are being properly utilised.
  - c) All required signage is displayed appropriately in and around the gaming area
  - d) All key venue personnel know where to find the TTCF Venue Resource Kit.
- Area Managers have checked all venues to ensure that the ATM is in sight of the main service area and neither the gaming machines nor the jackpot signs are visible from outside the venue.

### **Venue Personnel Obligations**

The Regulations hold Venue Managers to account with the overall responsibility of ensuring that a suitably qualified staff member has been designated to take charge of supervising the gaming machine area and ATM or EFTPOS usage throughout the time that the gaming area is available to the public. While it is preferable that the Venue Manager assumes control when they are on duty, it is inevitable that there will be occasions when they have no option but to delegate these responsibilities.

It must be noted that because the legislation deems the Venue Manager to be ultimately responsible, it is imperative that they choose wisely and ensure the person or persons they assign to the role are totally aware of their obligations and responsibilities.

Regardless of who performs the day-to-day roles, the Venue Manager is required to review gaming area sweep records and incident registers on at least a weekly basis. They are required to record details of any follow up they have had with staff members and/or players at the time they sign off their review.

Other key day to day responsibilities is listed below:

- A gaming area sweep must be carried out 3 times an hour with at least 10 minutes between sweeps. **Appendix 7** details the minimum information that must be recorded during each sweep.
- Identify any player that is showing possible signs of harm, as specified in **Appendix 8**.
- Have a conversation with any player showing any of these signs of harm. The intent of such a conversation is to ascertain whether the player should simply take a break, seek counselling and/or expert advice, complete a self-exclusion order or be issued with a venue exclusion order.
- All conversations must be entered in the Incident Register for future reference **Appendix 9**.

## Appendix 1

**TTCF's Resource Folder will contain the following items:**

- A copy of the Venue Licence including an approved list of gaming machines, jackpot (where applicable) and any special conditions imposed by the Secretary of Internal Affairs
- A copy of the Class 4 Game Rules
- A copy of the Foundation's Harm Minimisation Policies
- Problem Gambling Exclusion Orders (Self-initiated and Venue initiated)
- Instructions on the Multi Venue Exclusion processes
- A copy of the Venue Specific Harm Minimisation Initiatives
- Extracts from the Gambling Act 2003 and any updated associated Regulations as they pertain to the venue operator
- Regularly Updated Harm Minimisation Training Register
- Sweep Record and Incident Register Booklets
- A list of all Service Provider contact details
- Section 82 Signage (Information about class 4 gambling conducted at the venue)
- Harm Minimisation signage and brochures (Identifying problem gamblers)
- Game Rule 9 signage (Syndicated Play and Only One Gaming Machine per Player)
- Under 18 Age Restriction signage
- Grant Application signage
- Jackpot Information signage
- Problem Gambling Service Providers contact details
- Harm Minimisation Brochures



# THE TRUSTS COMMUNITY FOUNDATION

As a licensed Class 4 Gambling operator here in New Zealand, this Foundation is committed to meeting its regulatory and statutory obligations at all times.

Should you have a grievance with any aspect of our operation then details of how and where to lodge a Complaint is detailed below:

If the complaint relates to our Grant Application process, it must be in writing:

**The Trusts Community Foundation**  
**Private Bag 93108**  
**Henderson**  
**Auckland 0605**

If the complaint relates to the conduct of Class 4 Gambling at this venue or the Foundation itself:

**The Department of Internal Affairs (Gambling Compliance)**  
**PO Box 805**  
**Wellington 6140**  
**Tel: (04) 495-7200 or 0800 257 887**

For General Enquires: Phone 0800 882 3583, Option 1

*The Gambling Act 2003 prohibits venue operators, management, and personnel from being involved in the grant application process. This includes the decisions about, or in managing the application or distribution of the net proceeds from Class 4 Gambling.*





**NO PERSON SHALL PLAY MORE THAN  
ONE GAMING MACHINE AT A TIME  
&  
SYNDICATED PLAY IS STRICTLY PROHIBITED**

There is a linked Jackpot system operating in this gaming area.

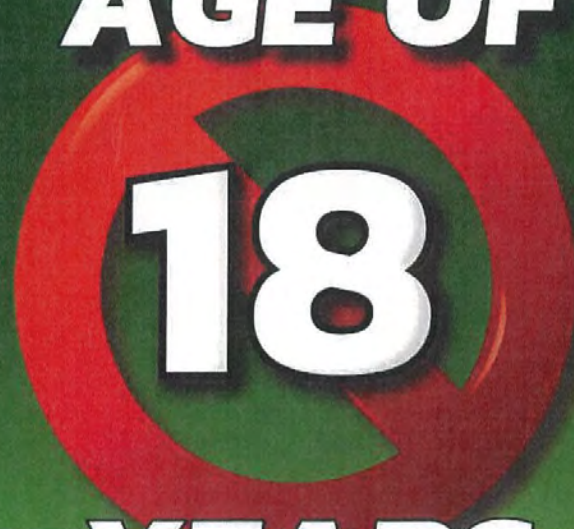
No person shall engage in syndicated play with any other player or players and/or solicit or induce any player to take part in such an arrangement. Similarly they must not induce or intimidate a player to vacate the machine they are playing.

Any person or persons found to be acting in breach of these requirements will be asked to leave the gaming area immediately, noting that they will also forfeit their rights to claim any wins and/or prizes owing to them.





**PERSONS  
UNDER THE  
AGE OF**



**YEARS**

**ARE NOT PERMITTED TO  
ENTER THE GAMING AREA  
OR PLAY  
THE GAMING MACHINES**

Parents are asked to supervise toddlers and young children at all times to ensure that they do not enter the gaming area whilst on the premises







## GRANT APPLICATIONS

TTCF operates an online application module on our website and welcomes applications for funding from any eligible local community based organisation.

It is strongly recommended that all applicants familiarise themselves with our current funding criteria BEFORE signing in to the online application module.

It's all there on the homepage of our website  
[www.ttcfltd.org.nz](http://www.ttcfltd.org.nz)

Should you require assistance at any stage of the process please contact our Grants Office by

**Telephone: 0800 882 3583, Option 2**

**OR**

**Email: [grants@ttcfltd.org.nz](mailto:grants@ttcfltd.org.nz)**





## Appendix 6



**Please don't be offended if  
we ask about your gambling.  
It's part of our staff's job.**

This venue has a policy for identifying and minimising gambling harm to players, which is available on request.



Te Tari Taiwhenua  
Internal Affairs

Te Whatu Ora  
Health New Zealand



## Harm Minimisation Gaming Room Sweep Report

[illegible]

## Appendix 8

### Definition of Harm:

Harm or distress of any kind caused or exacerbated by a person's gambling. This includes personal, social or economic harm suffered by any person, their spouse or partner, family, whanau, workplace, community or society at large.

### The 7 signs of harm:

- Withdrawing or attempting to withdraw cash from an ATM or EFTPOS device on two or more occasions in one day to use for gambling at the venue.
- Gambling during 9 or more consecutive gambling area sweeps
- Attempting to borrow money from venue personnel or other venue customers to use for gambling
- Leaving children in a car or otherwise unattended at the venue
- Waiting to gamble as soon as the venue opens
- Refusing to stop gambling at the venue with the venue is closing or otherwise appearing unable to stop gambling
- Appearing visibly distressed or angry either during or after gambling, (for example crying, holding their head in their hands, or hitting a machine)

### A problem gambler is anyone “whose gambling causes harm or may cause harm.”

In this way, ‘problem gambling’ does not necessarily mean ‘pathological gambling’ in a clinical sense. To make this clear, throughout these policies the term ‘harmful gambling’ has been used instead of the term ‘problem gambling’.

### Effects of Problem or ‘Harmful’ Gambling

While one person may be able to afford to spend \$20 on gambling, for another it may mean going without basic grocery items that week and while someone may be happy and safe spending a couple of hours in front of a gaming machine, for another that might take them away from caring for their children or other important responsibilities.

The financial and emotional stress arising from harmful gambling is likely to be affecting a person's household, their wider family and friends' network, and even their workplace.

Problems are likely to range from the person concerned having arguments with family members over the amount of money being spent on gambling, through to them facing major financial and/or interpersonal difficulties arising from a compulsive addiction to gambling.

## Appendix 9 HARM MINIMISATION INCIDENT & INTERVENTION RECORD

Staff Name: ..... Date: ..... / ..... / ..... Time: .....

Name/Description: .....

General Signs	Tick	Action Taken	Tick
<b>Length of Play</b>		Asked if the player was OK	
Gambles for long periods (9 gaming room sweeps) without a break	<input type="checkbox"/>	Questioned whether it was a good idea to continue playing	<input type="checkbox"/>
Gambles most days	<input type="checkbox"/>	Suggested the player take a break	<input type="checkbox"/>
Finds it difficult to stop at closing time	<input type="checkbox"/>	Suggested the player leave the venue for the day	<input type="checkbox"/>
<b>Social Behaviour</b>		Asked the player about their gambling	<input type="checkbox"/>
Becomes angry at or stands over other players	<input type="checkbox"/>	Made a note to continue to monitor the player	<input type="checkbox"/>
Is rude to other players or staff	<input type="checkbox"/>	Provide the Player with an HPA Brochure	<input type="checkbox"/>
Complaints to staff about losing	<input type="checkbox"/>	Explained the self-exclusion procedure	<input type="checkbox"/>
<b>Money</b>		Issued exclusion order	<input type="checkbox"/>
Puts large wins straight back into machine	<input type="checkbox"/>	Offer a Multi Venue Exclusion order	<input type="checkbox"/>
Tries to withdraw money two or more times from Eftpos	<input type="checkbox"/>	Speak to other staff about your concerns.	<input type="checkbox"/>
Uses venue ATM for the second time	<input type="checkbox"/>		
Leaves venue to find more money to gamble	<input type="checkbox"/>		
<b>Behaviour during play</b>			
Tries to play two or more machines	<input type="checkbox"/>		
Plays intensely without reacting to what is going on around them	<input type="checkbox"/>		
Plays very fast (high spend per line)	<input type="checkbox"/>		
Shows frustration (grunting/groaning, playing roughly)	<input type="checkbox"/>		
Shows some signs of distress (looks depressed, sweating, nervous/edgy)	<input type="checkbox"/>		
Has gambling rituals or superstitions (rubbing, talking to machine)	<input type="checkbox"/>		
<b>Strong Signs</b>	Tick	<b>Other comments:</b>	
Gambler tells staff that gambling is causing them problems	<input type="checkbox"/>	.....	
Shows obvious signs of distress (crying, holding head in hands, shaking)	<input type="checkbox"/>	.....	
Has an angry outburst towards staff, customer or machine (shouting/swearing, kicking/hitting machine)	<input type="checkbox"/>	.....	
Appearance or personal hygiene deteriorates significantly	<input type="checkbox"/>	.....	
Tries to borrow money from customers or staff	<input type="checkbox"/>	.....	
Leaves children in their car while they gamble	<input type="checkbox"/>	.....	
Friends or family raise concerns about gambler	<input type="checkbox"/>	Signed: .....	
Goes out of their way to avoid being seen at venue (including asking staff to not let others know they are there)	<input type="checkbox"/>	Reviewed by: ..... (Venue manger)	



## Appendix 10



## Venue Specific Initiatives

<b>Name of Venue:</b>	<b>Date:</b>
<b>Staff Training</b>	
<ul style="list-style-type: none"> <li>Name of person/s specifically assigned with the responsibility of ensuring all staff are familiar with the Foundation's set of Harm Minimisation policies.</li> </ul>	
<b>Comments:</b>	
<ul style="list-style-type: none"> <li>Provide details on how this is actioned</li> </ul>	
<b>Comments:</b>	
<ul style="list-style-type: none"> <li>Confirm that the venue's induction programme includes a session regarding Harm Minimisation, dealing with exclusion orders and preventing access to minors</li> </ul>	
<b>Comments:</b>	
<b>Monitoring Gaming Area</b>	
<ul style="list-style-type: none"> <li>Detail how often staff inspect the gaming area and list who is responsible for ensuring this happens</li> </ul>	
<b>Comments:</b>	
<b>Identifying Problem Gamblers</b>	
<ul style="list-style-type: none"> <li>Describe how the patrons in or around the gaming area are monitored for signs of problem gambling</li> </ul>	
<b>Comments:</b>	

<ul style="list-style-type: none"> <li>List the names of staff members who are responsible for making the ultimate decision regarding banning a patron from the venue</li> </ul>
<b>Comments:</b>
<ul style="list-style-type: none"> <li>List the names of staff members who are designated specifically to deal with patrons that request to be self-banned</li> </ul>
<b>Comments:</b>
<b>Identification of Minors</b>
<ul style="list-style-type: none"> <li>Confirm that all staff are aware that gaming patrons must be 18 years of age or older and that they know what an acceptable form of ID is i.e., NZ Drivers Licence, Passport, Student ID (with photo), NZ Firearms Licence or Pub Card</li> </ul>
<b>Comments:</b>
<ul style="list-style-type: none"> <li>Detail how public access into the gaming area is monitored on an ongoing basis and specifically what processes are in place to deal with those patrons suspected of being underage</li> </ul>
<b>Comments:</b>
<ul style="list-style-type: none"> <li>Confirm that staff are aware of the Foundation's "all-inclusive policy" i.e. babies and toddlers are considered to be minors and are prohibited from the gaming area</li> </ul>
<b>Comments:</b>
<b>Host Responsibility</b>
<ul style="list-style-type: none"> <li>Detail what policies have been established to ensure that Gaming Machines are not operated outside of the hours the primary activity at the venue is also being offered</li> </ul>
<b>Comments:</b>
<ul style="list-style-type: none"> <li>Detail what policies have been established to ensure that credit is not able to be offered for gambling purposes</li> </ul>
<b>Comments:</b>



<ul style="list-style-type: none"> <li>Detail what steps are taken to ensure a player does not play more than one Gaming Machine at a time</li> </ul>	
Comments:	
<ul style="list-style-type: none"> <li>Detail what checks are conducted to ensure that the following requirements are met:               <ul style="list-style-type: none"> <li>a) All required signage is on display</li> <li>b) Adequate stocks of problem gambling pamphlets are available</li> <li>c) Information on how to apply for Grant funding is displayed</li> </ul> </li> </ul>	
Comments:	
<ul style="list-style-type: none"> <li>Over and above completing a "player dispute/machine malfunction report", detail what systems and procedures are in place to deal with situations that require independent investigation and/or expert opinion.</li> </ul>	
Comments:	
<ul style="list-style-type: none"> <li>Detail the policies in place to ensure staff do not gamble while on duty</li> </ul>	
Comments:	
<ul style="list-style-type: none"> <li>Detail any other initiatives the venue has in place in relation to any of the headings listed above</li> </ul>	
Comments:	
<b>Signed</b>	
Venue Manager:	Date:
Venue Operator:	Date:

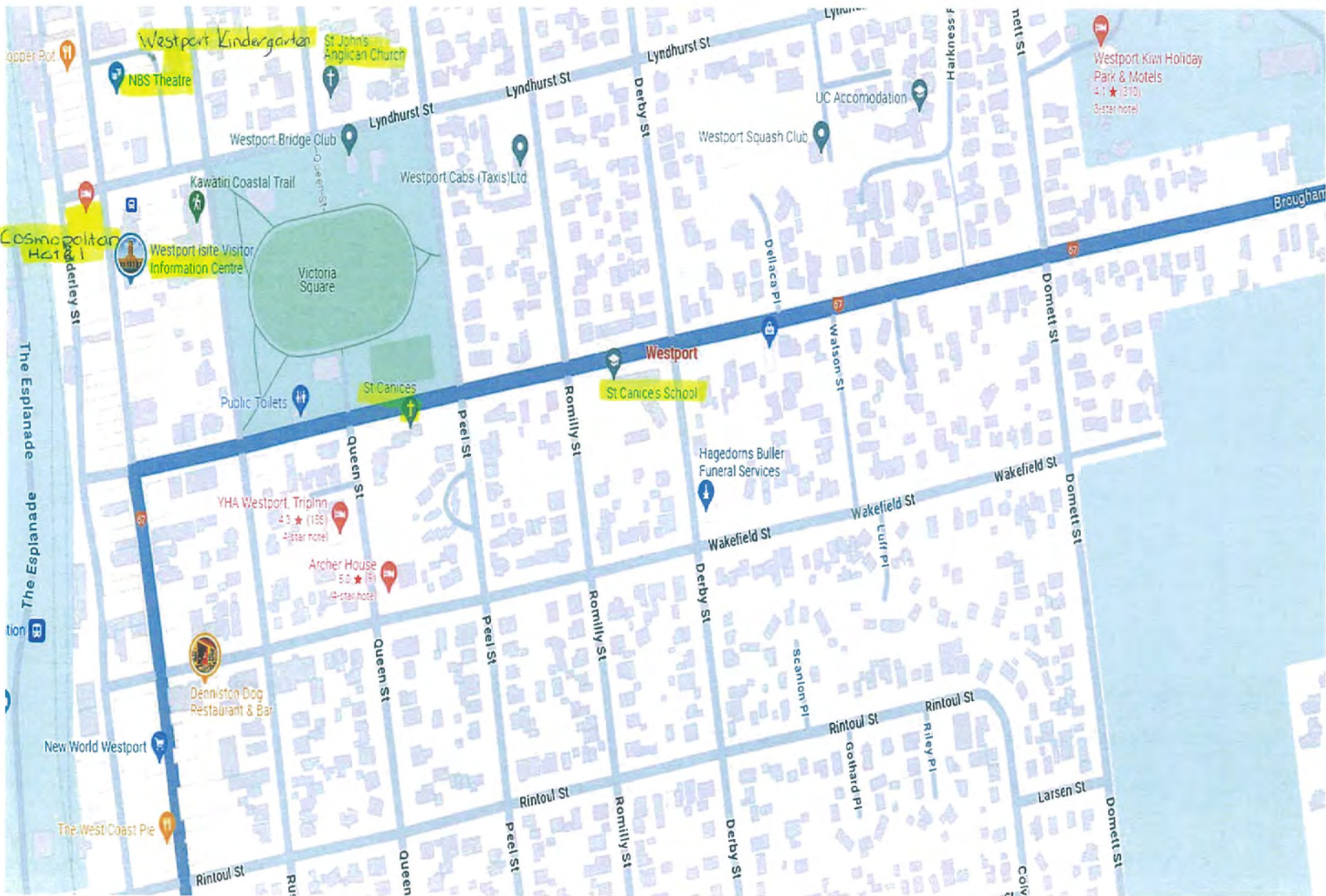


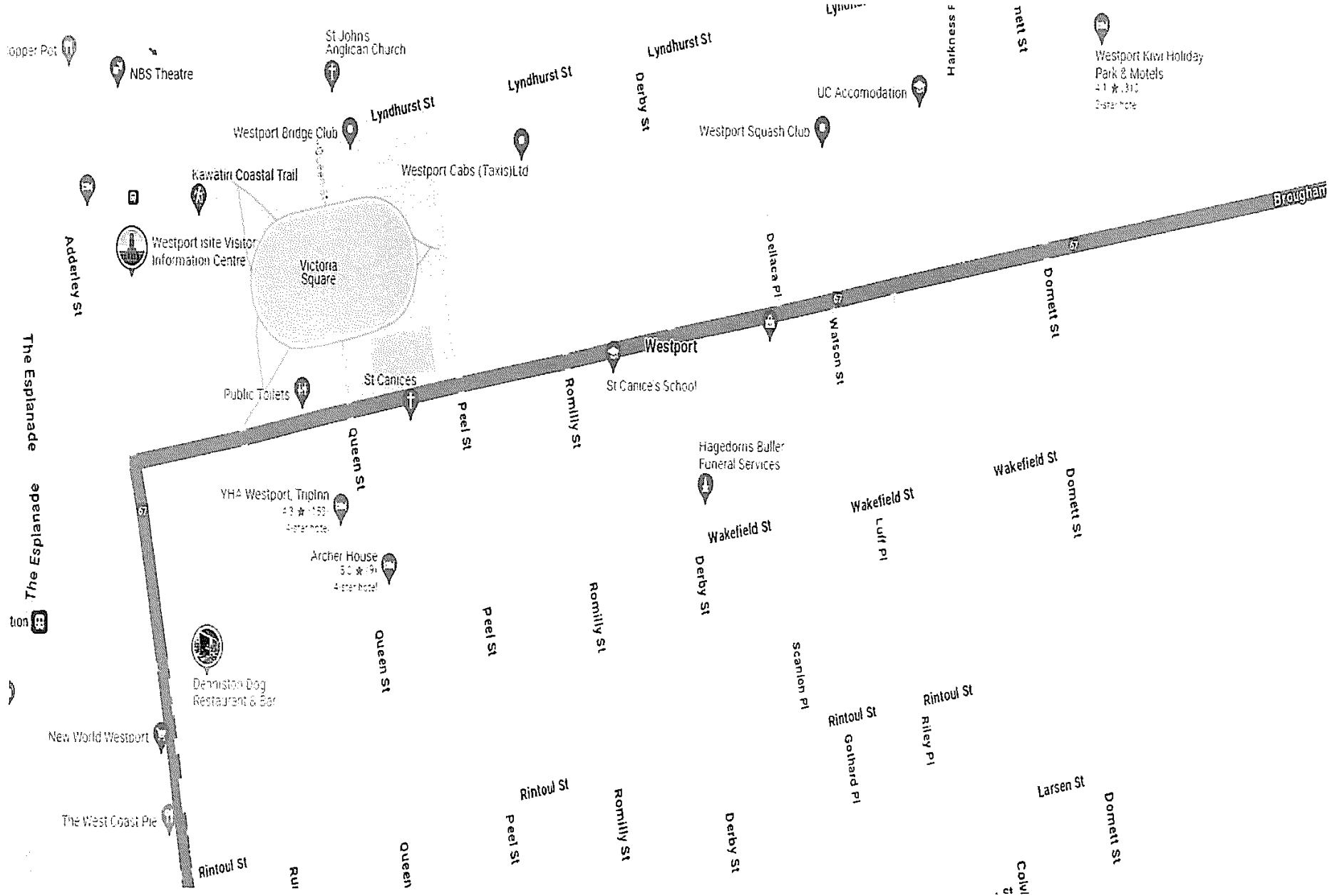
## Venue Specific Initiatives

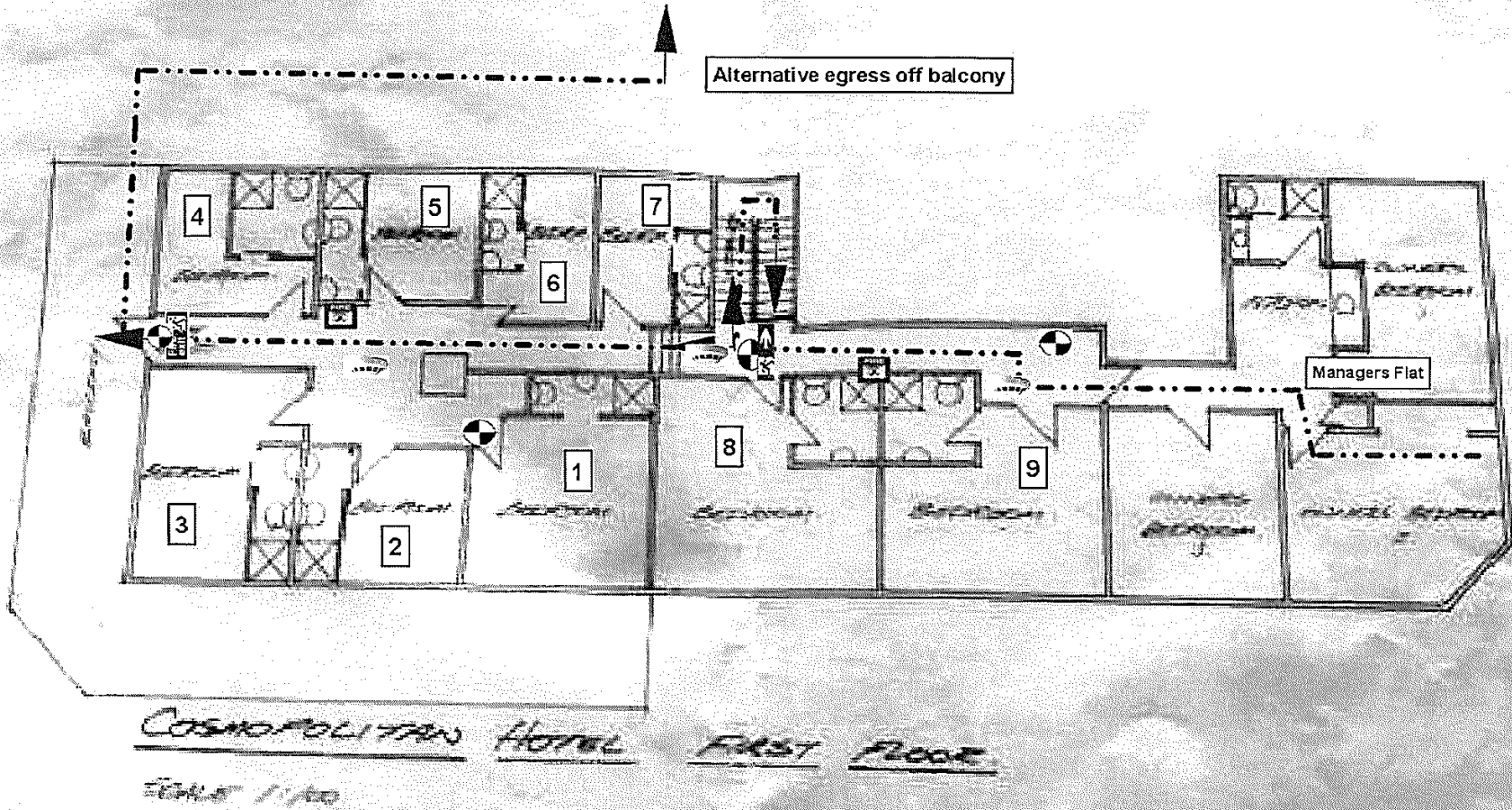
Name of Venue: COSMOPOLITAN HOTEL		Date: 01/07/2024
<b>Staff Training</b>		Comments
<ul style="list-style-type: none"> <li>Name of person/s specifically assigned with the responsibility of ensuring all staff are familiar with the Foundation's set of Harm Minimisation policies</li> </ul>		Venue Manager
<ul style="list-style-type: none"> <li>Provide details on how this is instigated</li> </ul>		Induction programme for all new staff involved in gaming
<ul style="list-style-type: none"> <li>Confirm that the venue's induction programme includes a session regarding harm minimisation (including identifying problem gambling), dealing with exclusion orders (self and venue initiated) and preventing access to minors</li> </ul>		Yes
<b>Monitoring Gaming Area</b>		With the aid of a CCTV system and regular staff visits
<ul style="list-style-type: none"> <li>Detail how often staff inspect the gaming area and list who is responsible for ensuring this happens</li> </ul>		
<b>Surveillance</b>		Yes a camera system with a monitor in the bar area for staff to view
<ul style="list-style-type: none"> <li>Does the venue have a Camera Surveillance system installed and if so what role does it play in monitoring the gaming area on an ongoing basis?</li> </ul>		
<b>Identifying Problem Gamblers</b>		Staff observations using techniques learnt in TTCF in-house Harm Min training programme
<ul style="list-style-type: none"> <li>Describe how the patrons in or around the gaming area are monitored for signs of problem gambling</li> </ul>		
<ul style="list-style-type: none"> <li>List the names of staff members who are responsible for making the ultimate decision regarding banning a patron from the venue</li> </ul>		Venue Manager
<ul style="list-style-type: none"> <li>List the names of staff members who are designated specifically to deal with patrons that request to be self banned</li> </ul>		Venue Manager

<p><b><u>Identification of Minors</u></b></p> <ul style="list-style-type: none"> <li>Confirm that all staff are aware that gaming patrons must be 18 years of age or older and that they know what is an acceptable form of ID i.e. NZ Drivers Licence, Passport, Student ID (with photo), NZ Firearms Licence or Pub Card</li> </ul>	<p>Yes all staff are aware of this regulation</p>
<ul style="list-style-type: none"> <li>Detail how public access into the gaming area is monitored on an ongoing basis and specifically what processes are in place to deal with those patrons suspected of being under age</li> </ul>	<p>Access is visible from the main bar, anyone looking close to the age of 18 is asked to provide proof of age</p>
<ul style="list-style-type: none"> <li>Confirm that staff are aware of the Foundation's "all inclusive policy" i.e. babies and toddlers are considered to be minors and are prohibited from the gaming area</li> </ul>	<p>All staff are made aware of this in TTCF Harm Min training</p>
<p><b><u>Host Responsibility</u></b></p> <ul style="list-style-type: none"> <li>Detail what policies have been established to ensure that Gaming Machines are not operated outside of the hours the primary activity at the venue is also being offered</li> </ul>	<p>Machines are only switched on when the bar is open for business</p>
<ul style="list-style-type: none"> <li>Detail what policies have been established to ensure that credit is not able to be offered for gambling purposes</li> </ul>	<p>Venue has a "No Credit" policy</p>
<ul style="list-style-type: none"> <li>Detail what steps are taken to ensure a player does not play more than one Gaming Machine at a time</li> </ul>	<p>Trust supply stickers stating this is not permitted, staff are made aware of this in Harm Min training</p>
<ul style="list-style-type: none"> <li>Detail what checks are conducted to ensure that the following requirements are met:               <ol style="list-style-type: none"> <li>All required signage is on display</li> <li>Adequate stocks of problem gambling pamphlets are available</li> <li>Adequate stocks of Grant application forms are available</li> </ol> </li> </ul>	<p>Visual check of this at the close of business each day</p>
<ul style="list-style-type: none"> <li>Over and above completing a "player dispute/machine malfunction report", detail what systems and procedures are in place to deal with situations that require independent investigation and/or expert opinion.</li> </ul>	<p>Contact TTCF for assistance</p>
<ul style="list-style-type: none"> <li>Detail the policies in place to ensure staff do not gamble while on duty</li> </ul>	<p>Venues internal policy is to not let staff ever play the venues gaming machines</p>
<ul style="list-style-type: none"> <li>Detail any other initiatives the venue has in place in relation to any of the headings listed above</li> </ul>	<p>Ensure all DIA and TTCF policies are adhered to</p>













The Trusts Community Foundation

Funding Granted in Westport

from

Three Class 4 Gaming Machine Venues

April 2021 – June 2024



application_i	operator_name	applicant_name	purpose	decision_descri	round_name	amount_approved	gen_category_name	_notes
37244	Westport	Westport Amateur Swimming Club	Funding towards pool hire for 2021 season	Approved	April 2021	2000	Sport & Recreation	B
37265	Westport	Buller Grey Power	Registration for delegates to attend the National Grey Power AGM to be held in Nelson 13-15 July 2021	Approved	April 2021	430	Community Wellbeing	A
37364	Westport	Westport Bowling Club Inc.	Funding for assistance towards the rates.	Approved	May 2021	4079	Sport & Recreation	A
37449	Westport	Buller Gorge Marathon Trust	Funding towards our Race Director Salary.	Approved	June 2021	15000	Sport & Recreation	B
37478	Westport	Buller High School	Funding towards accommodation & transport costs for Netball & Hockey teams attending tournaments	Approved	June 2021	6493.92	Education	H
37483	Westport	Potikohua Charitable Trust	Funding towards covering overheads and wages for the Volunteer Co-ordinator.	Approved	June 2021	10000	Community Wellbeing	H & L
37541	Westport	Kawatiri Group Riding for the Disabled	Funding towards the cost of wages for our Coach at Kawatiri Riding for the Disabled.	Approved	July 2021	10000	Sport & Recreation	A
37562	Westport	Palm Street Gallery Incorporated	Funding towards operational costs.	Approved	July 2021	8372.14	Environment, Heritage & / A	
37581	Westport	The Stroke Foundation of New Zealand	Funding towards the salary support for our Community Stroke Advisor based on the West Coast	Approved	July 2021	4927.38	Community Wellbeing	A
37710	Westport	Sunset Speedway	Funding towards the purchase of fire extinguishers required to operate our race track	Approved	December 2021	5060	Sport & Recreation	A
37798	Westport	RNZ Plunket	Funding to support the operational expenses, including wages, for our Westport Community Service Coordinator who facilitates Westport Plunket Family Support Services.	Approved	January 2022	7000	Community Wellbeing	A
37830	Westport	Westport Returned Soldiers Bowling Club	To assist with Trophies for the 2022 Classic Fours Bowling Tournament to be held in February 2022.	Approved	January 2022	1997.18	Community Wellbeing	L
37845	Westport	Buller Rugby Union Inc	Funding towards our Rugby Development Officers Wages.	Approved	February 2022	40000	Sport & Recreation	A
			Funding to help with the cost of replacing our roof which is in desperate need of replacement.					
37849	Westport	White Star Rugby Football Club Inc		Approved	February 2022	62780	Sport & Recreation	A
37855	Westport	Westport Golf Club Inc	Funding towards the replacement of 3 aluminum ranch sliders .	Approved	February 2022	15170	Sport & Recreation	A
37867	Westport	Life Education Trust West Coast	Funding towards the salary for the Educator and associated accommodation costs with travel to the region.	Approved	February 2022	10000	Community Wellbeing	A
37910	Westport	Westport Trotting Club Inc	Funding towards race day and operational expenses.	Approved	February 2022	62553.55	Sport & Recreation	L
37951	Westport	Ngakawau Rugby Football Club Inc	Funding towards jerseys and shorts for 3 additional teams.	Approved	March 2022	6786	Sport & Recreation	A
37998	Westport	Buller Basketball Association Incorporated	Funding towards the part time Administration Manager's wages.	Approved	Special Meeting March 2	19500	Sport & Recreation	A
			Funding towards the wages for our part-time Co-ordinator/Financial Mentor and our Part-time Financial Mentor.					
38027	Westport	Buller Budget Advisory Service Incorporated		Approved	April 2022	30000	Community Wellbeing	A
38066	Westport	Homebuilders West Coast Trust	Funding towards operating expenses.	Approved	April 2022	12077.4	Community Wellbeing	N
38083	Westport	Westport Old Boys Rugby Football Club	Funding towards repairs, ground rental and bus hire	Approved	April 2022	12910.44	Sport & Recreation	A
38115	Westport	West Coast Penguin Trust	Funding to purchase two 'Hand Held EID Tag Readers HR4', for the purpose of reading passive integrated transponder tags in blue penguins and gathering data to better inform conservation actions and outcomes.	Approved	May 2022	1737.39	Environment, Heritage & / A	
38132	Westport	Buller Gorge Marathon Trust	Funding towards the bus transport costs for the Oparara Wilderness Trail Run in Karamea on June 25th 2022.	Approved	May 2022	2564	Sport & Recreation	A
38234	Westport	Karamea Community Inc	Funding towards protective flooring squares for the new school/community hall.	Approved	June 2022	12000	Community Wellbeing	L
38254	Westport	Buller High School	Funding towards accommodation & travel costs for sports tournaments	Approved	June 2022	5072.38	Education	H
38288	Westport	Westport Bowling Club Inc.	Funding towards insurance and 12 months telephone rental.	Approved	July 2022	1543.39	Sport & Recreation	I
			Funding towards 12 weeks salary support for our part time Community Stroke Advisor (CSA) who works out of our Greymouth Office but who's area of work stretches from Karamea to Haast.					
38298	Westport	The Stroke Foundation of New Zealand		Approved	July 2022	2500	Community Wellbeing	B
38329	Westport	Potikohua Charitable Trust	We are applying for funding towards our overheads so we can continue with supporting our community.	Approved	July 2022	10000	Community Wellbeing	B
			Funding towards upgrading Basketball uniforms, Ipad's, storage and coding equipment					
38330	Westport	St Canice's School		Approved	July 2022	15000	Education	B
			Accommodation costs for 20 players travelling to the 44th Annual Seddon Shield Pool Tournament held in Marlborough.					
38341	Westport	Westland Pool Association		Approved	July 2022	5394.54	Sport & Recreation	A
38376	Westport	Westport Returned Soldiers Bowling Club	Funding towards maintenance and green upkeep	Approved	August 2022	6856.26	Community Wellbeing	A
38390	Westport	Black's Point Trust Board	Funding towards reprographic equipment to assist with digitising of Museum records and exhibits.	Approved	August 2022	840	Environment, Heritage & / L	
38509	Westport	Buller Sports Alliance	To cover the salary of the Sport Development Officer for 6 months.	Approved	October 2022	17550	Sport & Recreation	L
38553	Westport	Buller Country Music Club Inc.	Funding to purchase two sound speakers.	Approved	October 2022	2250	Environment, Heritage & / A	
38572	Westport	Buller Cricket Association Incorporated	Funding towards Cricket Development Officer salary	Approved	October 2022	15000	Sport & Recreation	A
38574	Westport	Westport Kindergarten Association Incorporated	Funding towards replacing clearlite and maintenance	Approved	October 2022	14799.87	Education	A
38596	Westport	Buller Agricultural & Pastoral Association	Funding to cover the ground costs of running the A & P show on 14th January 2023.	Approved	November 2022	6000	Community Wellbeing	A
38608	Westport	Karamea Historical Society Incorporated	Funding towards facility renovations	Approved	November 2022	50000	Environment, Heritage & / B	
38649	Westport	Kawatiri Group Riding for the Disabled	Funding towards our riding coach's wages.	Approved	November 2022	10000	Sport & Recreation	A
38689	Westport	Westport Golf Club Inc	Funding towards greenkeepers salary	Approved	January 2023	26000	Sport & Recreation	A
38711	Westport	RNZ Plunket	Funding towards operational costs	Approved	January 2023	8000	Community Wellbeing	A
38745	Westport	Westport Rugby Football Club Inc.	Funding towards purchasing team uniforms, replacing carpet, vinyl and outside decking	Approved	January 2023	35154.78	Sport & Recreation	L & N

38746 Westport	Westport South School	Funding towards transport and accommodation for Year 8 Urban Experience to Wellington March 2023	Approved	January 2023	8452.16 Education	H
38771 Westport	Buller Gorge Marathon Trust	Funding towards bus hire for the Buller Gorge Marathon 11th February 2023	Approved	January 2023	8504.8 Sport & Recreation	A
38796 Westport	NZ Council of Victim Support Groups Inc	Funding towards the Service Coordinator and the Support Worker who manages the cases for Victim Support Westcoast.	Approved	February 2023	10944.23 Community Wellbeing	A
38823 Westport	Bowls Buller Incorporated	Funding towards travel and accommodation to send teams to the National Intercentre Tournament to be held in Christchurch from the 16th March to the 19th March 2023 and also to the National Inter-club Tournament in Wellington from the 13th to the 16th April 2023.	Approved	February 2023	15000 Sport & Recreation	B
38830 Westport	Buller Volleyball Association	Funding to upgrade the Volleyball Net System and to assist with hosting our annual Invitation Volleyball Tournament.	Approved	February 2023	5461 Sport & Recreation	H
38832 Westport	Granity Players	Funding for the purpose of investing in radio microphones and associated equipment for the staging or community theatre projects in Buller coinciding with our upcoming production Broadway Musical "Big River".	Approved	February 2023	9550 Environment, Heritage & / A	
38839 Westport	Buller Rugby Union Inc	To part fund our Rugby Development Officer Wages	Approved	March 2023	25000 Sport & Recreation	B
38844 Westport	Life Education Trust West Coast	Funding towards the annual operating expenses of visiting the Buller region in 2023.	Approved	March 2023	10000 Community Wellbeing	A
38868 Westport	Buller Womens Golden Oldies Hockey	Funding towards costs attending NZ South Island Tournament 19-21st May	Approved	March 2023	3000 Sport & Recreation	
38909 Westport	Buller Basketball Association Incorporated	Funding towards Administration manager salary	Approved	March 2023	10000 Sport & Recreation	B
38973 Westport	Potikohua Charitable Trust	Funding towards overheads and wages for a Community Navigator/ Support.	Approved	April 2023	21530 Community Wellbeing	H
38999 Westport	Westport Old Boys Rugby Football Club	Funding towards playing equipment, ground rental and bus hire	Approved	April 2023	7210.14 Sport & Recreation	A
39002 Westport	Karamea Golf Club	Funding towards operational costs.	Approved	April 2023	6611.48 Sport & Recreation	I
39017 Westport	White Star Rugby Football Club Inc	Funding towards publishing club history book	Approved	April 2023	6980 Sport & Recreation	A
39169 Westport	Buller High School	Funding towards accommodation costs to attend SISS Tournament in Invercargill from 26th August 2023 to 1st September 2023.	Approved	June 2023	4786.08 Education	H
39211 Westport	Buller Health Trust	Funding towards two dental units and associated equipment.	Approved	May 2023	135880 Community Wellbeing	A
39240 Westport	Buller Rugby Referees Association Incorporated	Funding towards the purchase of new referee uniforms	Approved	July 2023	3277 Sport & Recreation	A
39265 Westport	Ngakawau Rugby Football Club Inc	Funding towards the purchase of a Trimax mower	Approved	July 2023	17000 Sport & Recreation	A
39339 Westport	The Stroke Foundation of New Zealand	Funding towards the Community Stroke Advisor salary	Approved	August 2023	13206.24 Community Wellbeing	A
39358 Westport	Westland Pool Association	Funding towards accommodation for the Representative Pool teams to represent the district from 1st - 2nd September 2023.	Approved	July 2023	3150 Sport & Recreation	A
39361 Westport	Buller Cricket Association Incorporated	Funding for ground rental for junior and senior cricket, cricket balls for community club cricket and to repair cricket nets for health and safety reasons.	Approved	August 2023	19793.04 Sport & Recreation	A
39408 Westport	St Canice's School	Funding towards new technology equipment and sports equipment.	Approved	September 2023	26833.34 Education	H & L
39415 Westport	Kaitiaki Mokihinui Charitable Trust	Funding to repair/ maintain parts of the pathway along the Chasm Creek Walkway, Seddonville, Buller.	Approved	September 2023	7611.55 Environment, Heritage & / A	
39440 Westport	Westport Bowling Club Inc.	Funding towards rates and power.	Approved	September 2023	6362.17 Sport & Recreation	N
39448 Westport	RNZSPCA Inc	Funding towards the salary of the West Coast Centre Support and Volunteer Coordinator to cover her adoption work across Westport.	Approved	September 2023	4000 Community Wellbeing	A
39592 Westport	Westport Trotting Club Inc	Funding towards running costs of our annual December race meeting and operational expenses.	Approved	October 2023	71979.51 Sport & Recreation	L
39594 Westport	Buller Agricultural & Pastoral Association	Funding is towards ground rental for annual AMP Show in January 2024.	Approved	November 2023	6000 Community Wellbeing	A
39595 Westport	Buller Budget Advisory Service Incorporated	Funding towards wages for two part time workers.	Approved	November 2023	20000 Community Wellbeing	A
39634 Westport	Buller Sports Alliance	Funding towards Sports Development Officers salary	Approved	November 2023	18525 Sport & Recreation	A
39643 Westport	Westport South School	Funding towards the Year 8 Urban experience 18th March - 22nd March 2024.	Approved	November 2023	9279.06 Education	H
39646 Westport	Palm Street Gallery Incorporated	Funding is towards operational costs.	Approved	November 2023	7556 Environment, Heritage & / A	
39653 Westport	Buller Gorge Marathon Trust	Funding towards First Aid for the Buller Gorge Marathon 10th February 2024	Approved	November 2023	4955 Sport & Recreation	B
39713 Westport	Rangimarie Croquet Club Inc	Funding towards the re-roof of the clubhouse, which was built Circa 1950.	Approved	January 2024	11900 Sport & Recreation	A
39717 Westport	Homebuilders West Coast Trust	Funding towards our Westport Office's operating expenses and lawn mowing.	Approved	January 2024	4623.45 Community Wellbeing	L
39792 Westport	RNZ Plunket	Funding towards operational expenses and wages for the Westport Plunket office.	Approved	January 2024	10000 Community Wellbeing	A
39835 Westport	Life Education Trust West Coast	Funding towards annual operating costs of our mobile classroom, the salary for our educator, and associated accommodation costs in the Westport region.	Approved	February 2024	16500 Community Wellbeing	B
39899 Westport	Westport Golf Club Inc	Funding towards our Green keepers wages.	Approved	March 2024	10000 Sport & Recreation	B
39924 Westport	Buller Rugby Union Inc	Funding towards our Game Development Officer Wages	Approved	March 2024	10000 Sport & Recreation	B

39959 Westport	Westport Rugby Football Club Inc	Funding towards operational costs, uniforms, training equipment, transport to attend matches and catering equipment	Approved	March 2024	15000 Sport & Recreation	B
39971 Westport	Buller Basketball Association Incorporated	Funding towards salary of our Administration Manager	Approved	March 2024	5000 Sport & Recreation	B
39977 Westport	Buller Volleyball Association	Funding towards administration costs, coaching & tournament management costs	Approved	March 2024	2222.5 Sport & Recreation	B
40026 Westport	Ngakawau Rugby Football Club Inc	Funding towards a replacement tractor	Approved	April 2024	32250 Sport & Recreation	A
40097 Westport	Kaitiaki Mokihinui Charitable Trust	Funding towards the Administrator's salary	Approved	May 2024	5200 Environment, Heritage & / A	
40116 Westport	Buller Health Trust	Funding towards our permanent GP salary	Approved	May 2024	25000 Community Wellbeing	B
40129 Westport	Buller Rugby Referees Association Incorporated	Funding towards the purchase of Camcorders	Approved	May 2024	6547.83 Sport & Recreation	A
40210 Westport	Northern Buller Museum, Granity	Funding towards a Walkway to the first tunnel of the Millerton Incline.	Approved	June 2024	56731 Environment, Heritage & / A	
40230 Westport	Buller High School	Funding towards transport and accommodation to attend the SISS Tournament from 2nd to 6th September 2024.	Approved	June 2024	11104.5 Education	A
					<b>1345916.7</b>	

Submission from **Trevor Wilson** on the application by The Trust Community Foundation<sup>1</sup> to increase the number of Gaming Machines at the Cosmopolitan Hotel, situated at 136 Palmerston Street Westport, from six to nine.

I oppose the increase in the number of gaming machines (GMs).

1. The population of Westport has a high exposure rate for gambling opportunities.
  - i. There is a total of 39 GMs in 4 venues.
  - ii. The National average ratio of GMs<sup>2</sup> to total population<sup>3</sup> is 28 to 10,000.
  - iii. The total population of Westport is approximately 4,250 which gives a ratio<sup>4</sup> of GMs to total Westport population of 91 to 10,000.
2. In 2023, over \$1 billion was spent on Class 4 gambling/pokies nationwide, with Buller District<sup>5</sup> contributing \$2.4 million.
3. High-risk and high-turnover, pokies are the most harmful form of gambling in New Zealand.
4. Gaming machine players are spending longer hours playing pokies, betting more per game and/or possibly more players are playing on the machines.
5. Rapid play, lack of natural breaks, and variable outcomes contribute to persistent gambling despite losses.
6. Pokies induce a dissociative 'flow state', particularly appealing to those with a gambling addiction.
7. The more opportunities to gamble the greater the resultant harm.
8. More people are seeking help from gambling harm advice services in recent years.
9. Declining this application will ensure gambling harm does not increase.

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<sup>1</sup> I note that Mr. J W Poyter, the sole director DJ 14 Limited and new owner of Cosmopolitan Hotel, has not been mentioned in the application.

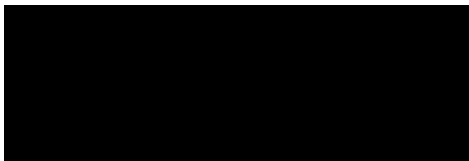
<sup>2</sup> See the [DIA quarterly lists](#) for 31 March 2024 data.

<sup>3</sup> From [2023 Census data](#)

<sup>4</sup> The ratio for the whole of the Buller District is 55 to 10,000

<sup>5</sup> From a PGF Group [factsheet](#)

10. Class 4 gambling is widely recognized as the most harmful form of gambling in New Zealand. The accessibility and addictive nature of these machines have led to significant levels of gambling harm, especially among vulnerable populations. The harm extends beyond financial loss, impacting mental health, relationships, and community well-being. Increasing the number of gaming machines in any community is likely to result in an escalation of these harms.
11. While the gambling industry contributes to community funding, the overall economic and social costs of gambling often outweigh the benefits. The profits from gaming machines are derived largely from the losses of those who can least afford it. In Buller, where deprivation levels are already concerning, the additional machines could lead to increased financial strain on individuals and families.
12. The introduction of more gaming machines will likely increase gambling harm within the community, particularly among high-risk groups such as Māori, Pasifika and those living in socio-economically deprived areas.
13. The strain on mental health and social services is expected to rise as more individuals and families experience the negative impacts of gambling. This includes an increase in demand for services related to financial counselling, mental health support, and social services.
14. Given the significant risks associated with increasing the number of Class 4 gaming machines, I strongly recommend that the Buller District Council based on the potential for increased harm and the lack of demonstrated community benefit decline this application.
15. I believe that the well-being of the Buller community should be the primary consideration in any decision regarding gambling facilities. The proposed increase in gaming machines presents significant risks to public health, particularly for vulnerable populations. I urge the Buller District Council to prioritize the health and social welfare of its residents by declining this application and considering stronger measures to reduce gambling harm in the community.



**Trevor Wilson**

9 August 2024

09 August 2024

Buller District Council  
6-8 Brougham Street  
Westport

Tēnā koutou

## Submission on Cosmopolitan Hotel's Class 4 gaming application

1. Thank you for the opportunity to submit on the Cosmopolitan Hotel's Class 4 gaming application. This submission has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu services the South Island including Te Tai o Poutini.
2. NPHS recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.
4. NPHS is focused on the achievement of equitable health outcomes. We use the Ministry of Health's definition of equity:  
*In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.<sup>1</sup>*
5. This submission sets out matters of interest and concern to NPHS Te Waipounamu, and our recommendations are based on evidence about public health and equity.
6. NPHS Te Waipounamu supports the submission made by Problem Gambling Foundation and encourages Council to consider the feedback they have provided.

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<sup>1</sup> Ministry of Health – Manatū Hauora (2024, July 2). Achieving equity. <https://www.health.govt.nz/about-ministry/what-we-do/achieving-equity>



## General Comments

7. Health and wellbeing are influenced by a wide range of factors beyond the health sector. Health and wellbeing outcomes are dependent on the collective and organised efforts of society, including local government and businesses.<sup>2</sup>
8. This submission reiterates points previously raised in our submission on Council's Class 4 Gambling and TAB Venue Policy Review submitted in August 2023.
9. NPHS Te Waipounamu opposes the application to increase the number of gaming machines at Cosmopolitan Hotel.

## Gambling harm

10. Gambling can lead to health, social, and economic harms for individuals, families and communities.<sup>3</sup> Research about the burden of gambling harm in New Zealand identified six main areas of gambling harm: decreased health (both morbidity and mortality), emotional/psychological distress, financial harm, reduced performance at work or education, relationship disruption/conflict/breakdown and criminal activity, including theft from family members, businesses and communities.<sup>4</sup>
11. Harmful gambling typically presents with other health issues such as higher levels of alcohol consumption, smoking and other-drug use.<sup>5</sup> Problem gambling behaviour also has substantial links to mental health problems and psychological wellbeing with problem gamblers reporting higher rates of depression and anxiety. Evidence suggests those with depression may not only use gambling to manage their symptoms but suffer depression because of their gambling.<sup>6,7,8</sup>

<sup>2</sup> Public Health Advisory Committee. (2004). *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee.  
[https://mohlibrary.softlinkhosting.co.nz/443/liberty/OpacLogin?mode=BASIC&openDetail=true&corporation=default\\_corp&action=search&queryTerm=uuid%3D%225e0914be0a5a01e27fdf294000051624%22&editionUuid=5e0914be0a5a01e27fdf294000051624&operator=OR&url=%2Fopac%2Fsearch.do](https://mohlibrary.softlinkhosting.co.nz/443/liberty/OpacLogin?mode=BASIC&openDetail=true&corporation=default_corp&action=search&queryTerm=uuid%3D%225e0914be0a5a01e27fdf294000051624%22&editionUuid=5e0914be0a5a01e27fdf294000051624&operator=OR&url=%2Fopac%2Fsearch.do)

<sup>3</sup> Browne M, Bellringer M, Greer N, Kolandai-Matchett K, Langham E, et al. 2017. Measuring the burden of gambling harm in New Zealand: Central Queensland University and Auckland University of Technology.

<sup>4</sup> Central Queensland University & Auckland University of Technology. (2017). *Measuring the burden of gambling harm in New Zealand*. Wellington, NZ: Ministry of Health.

<sup>5</sup> Central Queensland University & Auckland University of Technology. (2017). *Measuring the burden of gambling harm in New Zealand*. Wellington, NZ: Ministry of Health.

<sup>6</sup> Abbott, M., Bellringer, M., Garrett, N., & Mundy-Mcpherson, S. (2014). *New Zealand 2012 National Gambling Study: Gambling harm and problem gambling*. Report number 2. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre

<sup>7</sup> Abbott, M., Bellringer, M., Vandal, A., Hodgins, D., Palmer Du Preez, K., Landon, J., Sullivan, S., & Feigin, V. (2012). *Effectiveness of problem gambling brief telephone interventions: A randomised controlled trial*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

<sup>8</sup> SHORE. (2008). *Assessment of the Social Impacts of Gambling in New Zealand*. Auckland: Ministry of Health. Accessed from [http://www.shore.ac.nz/projects/Gambling\\_impacts\\_Final % 2010\\_ 02\\_09.pdf](http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf)

12. The risks and prevalence of harmful gambling are inequitably distributed, with Māori, Pacific peoples, some Asian communities and young people more likely to experience harmful gambling.<sup>9</sup>
13. Māori are disproportionately impacted by gambling. Māori generally reside in areas of high social deprivation where the majority of Class 4 venues are located. Māori are 2.88 times more likely to be moderate risk or problem gamblers compared with non-Māori.<sup>10</sup> We note that 13% of Buller's population are Māori.<sup>11</sup>
14. Most of the money gambled in New Zealand is spent on Class 4 gambling (pokies in pubs, clubs and TABs). Pokies are harmful because they are a continuous form of gambling that means that winnings can immediately be "reinvested". Research indicates that the rapid speed of play on pokies relative to other forms of gambling can lead to persistent gambling even in the face of losses.<sup>12</sup> Research suggests that continuous play on gaming machines increases the risk of problem gambling.<sup>13</sup>
15. The environment of gaming machines also encourages uninterrupted and solitary play with pokie rooms often having dimmed lighting, no tables to socialise around and an entranceway that minimises scrutiny.<sup>14</sup>

### **Buller District**

16. Gaming machine profits (GMP) were approximately \$2.4 million in the Buller District in 2023. This equates to approximately \$6500 being lost per day to Class 4 gambling in the Buller District.
17. GMP is all the money generated through the use of Class 4 gambling, less the amount paid back as prizes. The figure of \$2.4 million is the money that was lost in 2023 so the total money spent on gaming machines was actually much higher.

<sup>9</sup> Ministry of Health. (2022). *Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25*. Wellington: Ministry of Health.

<sup>10</sup> Te Hīringa Hauora. 2020. Health and Lifestyles Survey. Accessed from: <https://kupe.healthpromotion.govt.nz/#/>

<sup>11</sup> Statistics New Zealand. (2024). 2023 Census national and subnational usually resident population counts and dwelling counts. Accessed from: <https://www.stats.govt.nz/information-releases/2023-census-population-counts-by-ethnic-group-age-and-maori-descent-and-dwelling-counts/>

<sup>12</sup> Dixon MJ, Stange M, Larche CJ, Graydon C, Fugelsang JA, Harrigan KA. (2018). Dark Flow, Depression and Multiline Slot Machine Play. *Journal of Gambling Studies*. 34(1):73-84.

<sup>13</sup> Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2014). *New Zealand 2012 National Gambling Study: Gambling harm and problem gambling*. Report number 2. Auckland University of Technology, Gambling and Addictions Research Centre.

<sup>14</sup> Adams, P. and Wiles, J. (2016). *Gambling machine annexes as enabling spaces for addictive engagement*. Auckland: Centre for Addiction Research. University of Auckland, New Zealand.



18. The Buller District has a very high number of Class 4 venues and gaming machines per capita when compared with the rest of New Zealand. Table 1 below shows the ratio of venues and the ratio of machines per capita for Buller District and New Zealand.<sup>15 16</sup>

Table 1: Ratios of venues and machines per capita for Buller District and New Zealand

	Population (Census 2023)	Number of venues (March 2024)	Venues per capita	Number of machines (March 2024)	Machines per capita
<b>Buller</b>	10,446	7	1: 1,492	58	1: 180
<b>New Zealand</b>	4,993,923	999	1: 4,999	14,160	1: 353

19. Buller District currently has 3.4 times the national ratio of venues per capita, and 2.0 times the national ratio of machines per capita. If Cosmopolitan Hotel's application to increase their number of gaming machines to 9 is accepted, this ratio will increase to 2.1 times the national ratio.

20. Class 4 Gaming venues in New Zealand are disproportionately located in areas of economic deprivation, with around 50% located in deprivation deciles of eight to ten.<sup>17</sup>

21. In Buller District, 100% of Class 4 Gaming venues are located in either deprivation decile 9 or 10, the highest deciles for deprivation. This increases the risk of harmful gambling as people living in the most deprived areas spend on average up to three times more on Class 4 gambling compared with people in the least deprived area.<sup>18</sup>

<sup>15</sup> Statistics New Zealand. (2024). 2023 Census national and subnational usually resident population counts and dwelling counts. Accessed from: <https://www.stats.govt.nz/information-releases/2023-census-population-counts-by-ethnic-group-age-and-maori-descent-and-dwelling-counts/>

<sup>16</sup> Department of Internal Affairs. Gaming machine profits (GMP dashboard) March 2024. Accessed from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard/resource/60081bcd-f2ae-4b97-8a9f-fe449fa59969>

<sup>17</sup> Malatest International. (2021). *Gambling Harm Needs Assessment 2021*. Accessed from: <https://www.health.govt.nz/system/files/documents/publications/gambling-harm-needsassessment-2021.pdf>

<sup>18</sup> Ward, Adam D., Jack T. McIvor, and Paul Bracewell. (2020). *The Geographic Distribution of Gaming Machine Proceeds in New Zealand*. Kōtuitui: New Zealand Journal of Social Sciences Online 15(1): 54-74. <https://doi.org/10.1080/1177083X.2019.1640752>

***Proceeds of Gambling Funds***

22. Proceeds from gambling contribute to funding the community sector. However, a significant portion of these proceeds come from individuals and communities who are harmed by gambling.<sup>19</sup> Therefore, the way that the community sector is funded in New Zealand is a major social issue.

23. Research shows that there is a very strong redistributive effect from more deprived communities to less deprived communities when examining the origin of gaming machine profits (GMP) and the destination of Class 4 grants.<sup>20</sup>

24. There is no guarantee that the GMP lost in Buller is returned to groups in Buller. For example, of the \$2.4 million lost in Buller in 2023,<sup>21</sup> around \$739,000, or 32%, was returned to organisations based in Buller.<sup>22</sup>

***Policy Review***

25. We are aware that Council's Class 4 Gambling and TAB Venue Policy Review has been delayed. We encourage Council to continue with the policy review. As stated in our submission on this policy, we support revising the policy to further minimise gambling harm, and to ensure the wide scope of impacts from gambling are considered in the review process.

26. NPHS Te Waipounamu strongly supports the adoption of a sinking lid policy. This is the strongest policy available to gradually reduce the number of gaming machines and the harm that accompanies them. Many territorial authorities in New Zealand have adopted sinking lid policies.

27. A sinking lid policy prevents new gaming machine venues from opening, prevents the addition of new gaming machines to venues, and prevents the relocation of gaming machines and club mergers.

<sup>19</sup> McLeod J. (2017). *The New Zealand Cause Report: Shape of the Charity Sector*. Auckland: JB Were.

<sup>20</sup> Cox M, Hurren K, Nana G. (2020). *Assessment of the effects of Class 4 gambling on Wellbeing in New Zealand: Final Report*. Wellington: Business and Economic Research Limited.

<sup>21</sup> Department of Internal Affairs. Gaming machine profits (GMP dashboard) March 2024. Accessed from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard/resource/60081bcd-f2ae-4b97-8a9f-fe449fa59969>

<sup>22</sup> Department of Internal Affairs. (2024)). *Granted Dashboard - Grants by District*. Wellington: Department of Internal Affairs. Accessed from: <https://www.granted.govt.nz/dashboard.html>



28. NPHS Te Waipounamu recommends that Council, as part of the scoping process during the review of the Class 4 Gambling and TAB Venue Policy, undertakes a Social Impact Assessment (SIA) workshop to better understand the breadth of impacts of Class 4 gaming in the Buller community. We can support Council to carry out an SIA.
29. Social Impact Assessment is a process that gathers information and makes recommendations to guide a review or development of a policy. This process provides a platform to engage with a wide variety of stakeholders, including community groups and organisations, who have an interest in the effects of the policy. The process assists with balancing the economic, environmental, and social needs to promote more positive outcomes.

### Specific Comments

30. NPHS Te Waipounamu opposes increasing the number of gaming machines at Cosmopolitan Hotel because increasing the number of machines has the potential to increase gambling harm. There is evidence that increasing the density of pokie machines increases the prevalence of problem gambling.<sup>23</sup>
31. As stated in Council's existing Class 4 Gambling policies, "restricting the number of gaming machines that may operate in the district limits the opportunities for people to gamble. Limiting gambling opportunities will help prevent and minimise harm from gambling."
32. Cosmopolitan Hotel is located in a high deprivation area so increasing the number of gaming machines at this venue could further embed inequity in the local community.
33. NPHS Te Waipounamu notes that Cosmopolitan Hotel's application does not provide information about the location of individual gaming machines and where proposed additional machines would be located. We recommend that Council requests this information from the applicant to provide a clearer picture of the gaming environment and the impact this could have on play.
34. We note that the map provided in the application does not include information about the location and distances to other gaming venues. There are 3 other gaming venues in Westport that are within walking distance of Cosmopolitan Hotel: Black and White Hotel (3 minute

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<sup>23</sup> Storer, J., M. Abbott and J. Stubbs (2009). "Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines." *International Gambling Studies* 9(3): 225-244.  
<https://www.tandfonline.com/doi/pdf/10.1080/14459790903257981>

walk), Club Buller (6 minute walk) and Criterion Hotel (4 minute walk). This shows there is already plenty of opportunities to gamble in Westport.

35. NPHS Te Waipounamu notes that the liquor license provided in the application expires on 17<sup>th</sup> September. This means the liquor license may expire before a decision is made on Cosmopolitan Hotel's application to increase the number of gaming machines. We are aware that there are new owners of Cosmopolitan Hotel who are trading on the old owners' liquor license. Therefore, it may be more appropriate for Council to not consider this application until the new owners have secured a more permanent liquor license.

36. We note that Club Buller's application to increase the number of gaming machines was declined in May 2024. We recommend that Council takes a consistent approach and declines Cosmopolitan Hotel's application to increase the number of gaming machines.

37. NPHS Te Waipounamu strongly supports implementing a sinking lid policy in the Buller District because this is the best approach for preventing gambling harm. We encourage Council to decline Cosmopolitan Hotel's application because this aligns with the approach of a sinking lid policy.

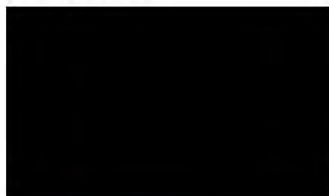
## Conclusion

38. NPHS Te Waipounamu wishes to be heard with respect to this submission.

39. We support the submission made by Problem Gambling Foundation.

40. Thank you for the opportunity to submit on the Cosmopolitan Hotel's Class 4 gaming application.

Ngā mihi,



**Vince Barry**

Regional Director  
National Public Health Service  
Te Waipounamu Region



**Te Kāwanatanga o Aotearoa**  
New Zealand Government

**From:** [info@bullerdc.govt.nz](mailto:info@bullerdc.govt.nz)  
**To:** [Licenses: Tarsha Armstrong](#)  
**Subject:** "Gambling submission form" received  
**Date:** Tuesday, 6 August 2024 12:20:25 pm

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Roslyn Bradley has made a gambling submission.

**Please indicate whether you:**  
**SUPPORT the application**

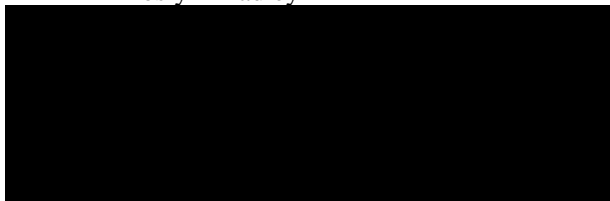
False

**OPPOSE the application**

True

**Full name of submitter**

Roslyn Bradley



**Please select one of the following options:**

**I WISH to be heard in support of my submission**

False

**I DO NOT wish to be heard in support of my submission**

True

**As a submitter, you have the opportunity to be heard by Council in support of your submission.**

**My submission is as follows:**

You have refused recent applications for increasing gaming machines at another venue. We do not need more machines in Westport.

This Hotel is small and does not need further input of gaming machines.

**Acknowledged by submitter**

Ros Bradley

**Date acknowledged**

6/8/2024





8 August 2024

Buller District Council  
PO Box 21  
Westport 7866  
Email: [licenses@bdc.govt.nz](mailto:licenses@bdc.govt.nz)

Tēnā koe,

### Submission on Cosmopolitan Hotel's Class 4 Gaming Venue Application

PGF Services appreciates the opportunity to comment on the application submitted by Cosmopolitan Hotel to the Buller District Council to increase gaming machines on the premises from six to nine.

Our submission is evidence-based and founded on what is known about gambling harm across Aotearoa New Zealand, and beyond.

PGF Group is a Charitable Trust that operates nationally to provide gambling harm minimisation and prevention services. Our services are delivered under contract to Te Whatu Ora and funded from the gambling levy. As part of our public health work, we advocate for the development of public policy that contributes to the prevention and minimisation of gambling-related harms.

We also encourage Buller District Council to finalise its Class 4 Gambling Policy review given recent applications to increase machine numbers from different venues.

### Recommendation

PGF **opposes** Cosmopolitan Hotel's application to increase the number of Electronic Gaming Machines (EGMs or pokies) on its premises.

As an organisation that sees harm from gambling on a daily basis, we are strongly opposed to any increase in the numbers of EGMs, regardless of circumstance.





## Key information

### Class 4 gambling

Class 4 gambling (pokies in pubs, clubs and TABs) is categorised as high-risk, high-turnover gambling. Pokies, continue to be the most harmful form of gambling in Aotearoa New Zealand and the primary mode of gambling for those seeking help.

Most of the money gambled in New Zealand is spent on pokies. In 2023, more than \$1 billion was spent on pokies across New Zealand. Buller District contributed approximately \$2.4million in the same year.<sup>1</sup> A New Zealand gambling study estimates that 30% of EGM losses come from problem and moderate risk gamblers.<sup>2</sup>

### Impact of gambling harm to vulnerable population groups and deprivation

Māori are disproportionately impacted by gambling. Māori disproportionately reside in areas of high social deprivation where the majority of Class 4 venues are located. Māori are 3.13 times more likely to experience gambling harm compared with non-Māori.<sup>3</sup> We note that 11.2% of Buller's population are Māori.<sup>4</sup> All of the Class 4 venues in Buller are located in areas of high deprivation, i.e. decile 9-10.

### Funding

EGMs took the place of funding community groups when tobacco sponsorship of sporting and other events was banned in 1994. How the community sector is funded is a major social issue in Aotearoa New Zealand with around a quarter of community sector funding coming from gambling. A significant portion of this is coming from people, whānau and communities who are harmed by gambling.<sup>5</sup>

<sup>1</sup> Department of Internal Affairs. Gambling Expenditure. 2024 [Available from: <https://www.dia.govt.nz/gambling-statistics-expenditure>.]

<sup>2</sup> Abbott M, Bellringer, M., Garrett, N. New Zealand National Gambling Study: Wave 4 (2015). Report number 6. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre; 2018.

<sup>3</sup> Te Hīringa Hauora. Results from the Health and Lifestyles Survey 2020. Wellington: Te Hīringa Hauora; 2021.

<sup>4</sup> Statistics New Zealand. 2018 Place Summaries - Buller District. Wellington: Statistics New Zealand; 2024 Available from: <https://www.stats.govt.nz/tools/2018-census-place-summaries/buller-district>.

<sup>5</sup> McLeod J. The New Zealand Cause Report: Shape of the Charity Sector. Auckland: JB Were, 2017.



In 2015, Trusts and Societies were mandated to return a minimum of 40% of gaming machine profits to the community by way of grants or applied funding. It is important to realise that it cannot be guaranteed that the GMP lost in Buller District is returned to groups in Buller District. For example, of the \$2.4 million lost in Buller District in 2023, \$739,120 was returned to organisations based in Buller District in 2023.<sup>6</sup> This is only around 31% of the amount lost in 2023.

GMP generated from pokies in chartered clubs are not required under the Gambling Act 2003 to be distributed in the same way as pubs. Rather, clubs are required to allocate GMP to an authorised purpose, which includes the running of club properties and operations and distributing funds to certain community groups. Details around how clubs apply its net proceeds to its authorised purpose varies from club to club and is not included in the \$739,120 sum above.

#### Client intervention data

It is difficult to quantify the extent of gambling harm due to significant under-reporting. Only 16% of potential clients actually access or present to services for support. This is similar for other addictions such as alcohol and drugs.<sup>7</sup> Under-reporting is attributed in part to *whakamā*, shame, guilt, embarrassment, or simply not being aware of being caught up in a cycle of gambling addiction until too late.

We can, however, begin to build a picture of gambling harm across the Buller district using Ministry of Health client intervention data together with Multi Venue Exclusions (MVEs) and local anecdotal data.

The Ministry of Health's Client Intervention data reports that 28 people in the Buller District presented for help with their or someone else's gambling between June 2022 and July 2023.<sup>8</sup> Additionally, 11 individuals self-excluded from 44 class 4 venues across the West Coast and Canterbury regions; the majority being male aged between 30 and 49 years. MVEs have been used as an intervention tool in New Zealand since 2011 to enable gamblers to self-exclude from multiple

<sup>6</sup> Department of Internal Affairs. Granted Dashboard – Grants by District. Available from:

<https://www.granted.govt.nz/dashboard.html>

<sup>7</sup> Ministry of Health. Strategy to prevent and minimise gambling harm 2019/20 to 2021/22. Wellington; 2019.

<sup>8</sup> Ministry of Health. Intervention client data. Wellington: Ministry of Health; 2023 Available from:

<https://www.health.govt.nz/our-work/mental-health-and-addiction/addiction/gambling/service-user-data/intervention-client-data#ppgm>



venues without having to visit each individual site. MVEs are a legally binding contract between the gambler and the venue with penalties for breaches.

Anecdotal data from the PGF Southern counselling team report that many people in the Buller community are concerned about the negative impact of class 4 gambling on individuals, whānau and their community. Comments include:

- Wish there were no machines at all
- Family members has had issues in the past with Class 4 gambling
- Venue staff are not approaching the players to stop them from gambling
- Family arguments because there's no money for the power bill or food for the kids
- The shame of having to get a food parcel.

### Pokie characteristics

We are often asked why so many people are attracted to or continue to play the pokies despite the known risks of gambling harm and addiction. Research indicates that the rapid speed of EGM play relative to other forms of gambling; the lack of natural breaks from gambling, and the highly variable outcomes such as *near misses* and *losses disguised as wins* are some of the factors that lead to persistent gambling even in the face of losses. This is particularly true amongst those already experiencing gambling harm and addiction.<sup>9</sup>

Research has also shown that pokies induce a dissociative 'flow state' where a gambler's awareness of self, the passage of time, and surroundings are diminished. For those already experiencing harmful and/or problem gambling and who may also be suffering from depression, the 'flow state' in itself, can be addictive as it provides the player with a level of superficial relief.<sup>9</sup>

### Conclusion

Our organisation **urges** Council to decline Cosmopolitan Hotel's application to increase the number of pokies in its premises.

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<sup>9</sup> Dixon MJ, Stange M, Larche CJ, Graydon C, Fugelsang JA, Harrigan KA. Dark Flow, Depression and Multiline Slot Machine Play. J Gambl Stud. 2018 Mar;34(1):73-84.

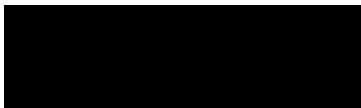


In its decision making, we ask Council to consider both the direct and indirect cost of gambling harm across its district. While the financial cost of gambling is substantial across all levels of society, the social and psychological impact to individuals, families and communities is equally devastating.

Our organisation supports the submission made by Te Whatu Ora's National Regional Public Health Service and asks Council to consider the feedback they have provided. We thank you again for the opportunity to provide comment.

Ngā mihi nui,

Kristy Kang  
Policy Programme Lead  
PGF Services



**From:** [info@bullerdc.govt.nz](mailto:info@bullerdc.govt.nz)  
**To:** [Licenses: Tarsha Armstrong](#)  
**Subject:** "Gambling submission form" received  
**Date:** Thursday, 8 August 2024 9:40:53 am

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Buller Budget Advisory Service Incorporated has made a gambling submission.

**Please indicate whether you:**

**SUPPORT the application**

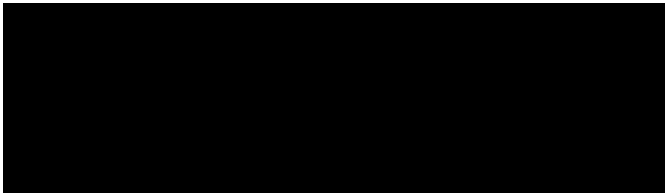
False

**OPPOSE the application**

True

**Full name of submitter**

Buller Budget Advisory Service Incorporated



**Please select one of the following options:**

**I WISH to be heard in support of my submission**

False

**I DO NOT wish to be heard in support of my submission**

True

**As a submitter, you have the opportunity to be heard by Council in support of your submission.**

**My submission is as follows:**

The New Zealand Index of Deprivation 2018 rates most areas in Buller District as having deprivation of 9 or 10 (1 being least deprived and 10 being most deprived).

With the exception being rural South Buller at level 5.

<https://www.ehinz.ac.nz/indicators/population-vulnerability/socioeconomic-deprivation-profile/>

Statistics NZ's 2018 Census shows the median income in Buller District was \$22,900 with only 9% of the population earning more than \$70,000.

Every day at BBAS we assist people who are struggling to pay for the essentials and many people are falling behind with debt repayment. When we work with clients, gambling frequently appears as a regular expense which they cannot afford. The hope of having a win when gambling is a strong temptation and is considered by some to be a solution to financial challenges. In our experience the opposite is the most likely outcome. Evidence shows people and families experiencing mental health challenges, addictions (alcohol, drugs, gambling) are more likely to suffer financial challenges and poverty (source NZ Government enquiry into Mental Health and Addiction). Therefore our organisation opposes having more gambling machines in Buller District. We believe a sinking lid approach would be more beneficial to the economic and social wellbeing of the Buller community.

**Acknowledged by submitter**

Nel van Greevenbroek

**Date acknowledged**

8 August 2024



**Report on an application for Council consent to increase  
gaming machines numbers under the Buller District  
Council *Class 4 Gambling and Totalisator Agency Board  
(TAB) Venue Policy***

Class 4 gambling venues are permitted under Key Issue 1 of the Councils Class 4 Gambling and TAB Venue Policy.

The Policy is that class 4 gambling venues may be established in Buller subject to:

- (i) Meeting application and fee requirements,
- (ii) The primary activity of the premises is onsite entertainment, recreation, or leisure focused on persons 18 years and over, and
- (iii) Whether the premises is authorised under the Sale and Supply of Alcohol Act 2012 to sell and supply alcohol for consumption on the premises.

**Applicant:** Paul Adams on behalf of The Trust Community Foundation Limited (Ltd)

**Venue:** Cosmopolitan Hotel  
136 Palmerston Street  
Westport 7825

**Particulars of application**

Paul Adams, on behalf of The Trust Community Foundation Limited (Ltd), is seeking Council consent under the Class 4 Gambling Venue Policy (the Policy) for the addition of three Class 4 gaming machines at the Cosmopolitan Hotel (the Venue). Full details can be read in the attached application provided by Mr Adams.

The application meets the requirements for an application under the Policy, however relevant gambling harm minimisation policies, and a list of sensitive locations and distances were not enclosed as requested within the initial application requirements.

The harm minimisation policy was supplied at a later date, which also included a detailed list of the funds granted to the Buller district communities.

There is no mention in the application whether the venue would require alterations to the gaming area, and what this may look like, to assess the environment or impact of play for users of the area and other hotel patrons.

### **Application Requirements**

The Policy allows for the establishment of Class 4 venues in Buller subject to the following:

#### **(i) Meeting application and fee requirements**

The applicant has met the application requirements, paid the application fee and has agreed to pay the costs associated with publicly notifying the application.

The public notice of application was published in The News and on Buller District Councils website on 26/07/2024 and 02/08/2024.

#### **(ii) The primary activity of the premises being onsite entertainment, recreation, or leisure focused on persons 18 years and over**

The applicant has stated that the primary activity of the Venue is a "Hotel". The Venue includes the sale of alcohol, both for consumption on the premises and accompanied with the sale of food.

The site plan included with the application shows the existing gaming machines are situated in a separate purpose-built casino room area (photos attached to the end of this report). This room is accessed from within the main lounge bar near a secondary entrance to the premises. The main bar lounge houses a large bar, an open fireplace, a pool table, chairs and leaners. Photos of the existing gaming area are attached to this report.

#### **(iii) The premises being authorised under the Sale and Supply of Alcohol Act 2012 to sell and supply liquor for consumption on the premises**

At the time of writing, the Venue was recently sold and is under new management, which is operating under a Temporary Authority licence (TA24005 expiring 17/12/24),

with the underlying licence being 54/ON/011/2020 expiring 7/11/2023 (in processing), under sections 136 and 14 of the Sale and Supply of Alcohol Act 2012. An application for a New On-Licence has been received by Council and is being processed. The new owners have limited experience in running a licenced premises. The current hours of operation are licensed as Monday to Sunday between 08.00am and 3.00am the following morning.

Cosmopolitan Hotel currently holds a class 4 gambling venue licence and fit the three criteria as listed above.

### **Gambling Act**

The Responsible Gambling Bill was announced on 17 October 2001 and passed into law as the Gambling Act on 18 September 2003.

Licence amendments, or applications to merge venues which date back to that time, are subject to requirements around the numbers of gaming machines they may operate. Sites or venues that were on a society's licence on 17 October 2001 that have not been without a Class 4 venue licence for a period of six months or more, may operate up to a maximum of 18 gaming machines.

The actual total number of machines they are allowed to operate will depend on the number of notified machines they had on 22 September 2003. If this is less than 18, they need to get territorial consent to increase the number of machines to the potential maximum of 18.

### **Policy**

Council consent is required under the Policy because the applicant seeks *“to increase the number of gaming machines at an existing Class 4 venue to more than the number operating at that venue on 22 September 2003,”* and it is also *“more than the number previously consented to by Council”*.

Under the policy and the Gambling Act 2023, the maximum number of gaming machines allowed at Class 4 venues are as follows:

- Class 4 gambling venues licenced after 17 October 2001 shall be allowed a maximum of nine gaming machines.

- Class 4 gambling venues licenced before 17 October 2001 shall be allowed a maximum of 18 gaming machines.

The Cosmopolitan Hotel was licensed as a class 4 gambling venue before 17 October 2001, therefore under the Act and Council's Policy: *"shall be allowed a maximum of 18 gaming machines"*.

When considering this application for consent, the Council will have regard to the characteristics of the venue and may impose a maximum number on the consent that is less than the applicable maximum of 18.

The current consent for this venue allows for six gaming machines only.

### **Submissions**

Five submissions have been received in opposition to the application.

- Te Whatu Ora,
- The Problem Gambling Foundation (PGF) Group,
- Buller Budget Advisory Service Incorporated,
- Ros Bradley, a local resident of Carters Beach and,
- A member of the public who resides in Mangere, Auckland.

Three of the five wish to speak to their submission at the hearing.

No submissions were made in support of this application.

**In considering all applications relating to Class 4 gambling venues under the Policy Council may consider any matter, but will consider the following:**

#### **(i) Characteristics of the district and parts of the district**

At the last Census (2018), the Buller District had 9,591 persons living in the area, 1,077 of these are Maori.

The Buller District, as of 30<sup>th</sup> December 2023, has a total of seven approved venues with 58 gaming machines spread across the district and are as follows:

- One venue in Karamea with 4 machines (Karamea Village Hotel),
- Two venues in Reefton with 15 machines (Dawsons 9 and Hotel Reefton 6),
- Four venues in Westport with 39 machines (Club Buller 10, Criterion Hotel 9, Black & White Hotel 14 and Cosmopolitan Hotel 6).

Four of these venues have nine or more gaming machines operating, with three of those venues in Westport.

The increase would total the gaming machines to 61 in the Buller District.

One premises with 14 operating gaming machines (not included in the above numbers) closed between September and December 2023.

The Buller District has 3.4 times the national ratio of Class 4 venues per capita when compared with the rest of New Zealand, and 2.0 times the national ratio per head of population, which equates to one machine for every 165.3 people. This will increase to 2.1 if the application to increase the number of machines is accepted and would equate to one machine for every 157.2 people.

The Westport area currently has 2.3 times the national ratio for machines per head of population. This will increase to 2.5 if the application to increase the number of machines is accepted.

The New Zealand Index of Deprivation 2018 has the Buller region between decile 8 to 10 (10 being the highest). All the Class 4 venues located in Buller are within decile 9 and 10 areas.

Information about spending on Class 4 gambling and instances of problem gambling is collected at a district level. Approximately \$2.4 million (about \$6,500 per day) was spent on Class 4 gambling in the Buller District in 2023. Compared to the year before, this amount has decreased by \$161,474.41. It is likely that the decrease was a result of a venue closing which housed 14 gaming machines during the traditional peak quarter of the year.



The median income for the Buller district, as stated on the 2018 census data, was \$22,900.00 with only 9.8% of the population earning over \$70,000.00.

The risk of harmful gambling increases as people living in the most deprived areas, are spending on average up to three times more on Class 4 gambling compared with other people in less deprived areas.

Maori are disproportionately impacted by gambling and are 3.13 times more likely to experience gambling harm compared with non-Maori. The last three census (2006, 2013 and 2018) captured data shows consistent upward growth of Maori residing in the Buller region.

The number of Buller residents seeking help from problem gambling services rose sharply between July 2019 and June 2022 (likely as a result of the Covid-19 shutdowns). However, the period between July 2022 to June 2023 decreased. Between July 2019 and June 2023, the average number of Buller residents seeking help per year was 41.7 (*Ministry of Health Figures*). This data does not include family and other who also sought help due to a gambling addiction of someone they know.

**(ii) Locations of kindergartens, early childhood centres, schools, places of worship and other community facilities**

The venue is located within the Westport township on Palmerston Street and is within a commercial zone in the Buller District Plan.

There are many sensitive sites near the venue, these include:

- The Westport Kindergarten 130m
- Westport Public Library 180m
- Salvation Army Worship Hall 370m
- Masonic Lodge 380m
- The NBS Theatre 80m
- Buller High School 900m
- Victoria Square 150m (this has a public skate park, pump track and playground)
- St Johns Anglican Church 270m

- Elim Church 300m
- Living Waters Church 550m

The closest other Class 4 gaming venues are Club Buller with ten gaming machines, the Black & White Hotel with fourteen gaming machines and the Criterion Hotel with nine gaming machines. All four of these venues are within a 400m radius of the applicant.

**(iii) The number of gaming machines that should be permitted at any venue**

There are currently seven Class 4 gambling venues in the Buller District.

Department of Internal Affairs (DIA) website records show that in 2001, the venue was operating six gaming machines. The Trust Community Foundation Limited at the Cosmopolitan Hotel currently has six consented gaming machines in operation and has applied to increase that to nine. The Trusts Community Foundation Ltd also owns the 14 gaming machines operating at the Black & White Hotel venue.

The Policy sets a maximum number of gaming machines based on when a venue was licenced, in accordance with the Gambling Act 2003.

Under the current Policy, the relevant maximum for this Venue is 18 gaming machines.

If this application is granted, the Venue will be operating nine gaming machines, nine less than the maximum number for the Venue.

If the Venue had been licenced after 17 October 2001 under the Policy, granting this application would take the Venue to the maximum number of machines allowed.

Because of the potential for gambling to cause harm to individuals, the Policy of the Council under Key Issue 2 is *“to limit the number of gaming machines allowed at a venue”*.

**(iv) The cumulative effects of additional opportunities for gambling in the district**

At the time the Gambling Act in 2003 became legislative, Buller District had 27 gambling venues operating. All seven of the currently consented venues were operating during this time. Under Section 92 of the Act, this means that all seven venues are allowed a maximum of 18 gaming machines each. Under the current policy, if it was allowed to be increased to the maximum numbers, would total 126 gaming machines in the Buller district. This equates to one machine for every 76.1 people.

When considering the cumulative effects of opportunities to gamble in the district, Council will consider both the number of gaming machines currently operating, and the number of gaming machines currently able to operate.

In 2023, over \$1 billion was spent across New Zealand by people using Class 4 gambling (gaming/pokie) machines in clubs, pubs, and TAB's. As stated earlier, approximately \$2.4 million was spent in the Buller region alone.

An effect of additional gambling opportunities that may affect the whole district, is the potential increase in available funding from the Trust Community Foundation Ltd with the addition of the three gaming machines. Trusts and societies are mandated under the Gambling Act to return a minimum of 40% of gaming machine profits (GMP) back to the community by way of grants or applied funding. Clubs are not mandated to share net profits.

The Department of Internal Affairs grants dashboard shows that of the \$2.4 million lost/spent in the Buller district in 2023, only \$739,120.00 was returned to organisations based in Buller's district (31%). Proceeds distributed by Clubs (if any) are not included in the above sum.

In an attached email Mr Adams stated, that 100% of all funding generated in the Buller district by the Trusts Community Foundation Ltd GMP, is distributed back into the local Buller area. It is not clear what the total amount of GMP was (in 2023)

generated by the 20 machines in the Buller district by the Trusts Community Foundation Ltd.

The grants data supplied by the applicant, shows a total of approximately \$597,592.58 of GMP was granted out to the community in the year 2023.

Class 4 gambling is categorised as a high risk with a high turnover. Gaming machines, known commonly as “Pokies” are the most harmful form of gambling in Aotearoa New Zealand and is documented by the Problem Gambling Foundation as the primary mode of gambling for those seeking help.

There is currently no sinking lid policy implemented within the Buller District.

A sinking lid policy is the strongest policy available. It prevents new gaming machine venues from opening, prevents the addition of new gaming machines to venues, and prevents the relocation of gaming machines and club mergers.

36 other Territorial Authorities (TA) in New Zealand have adopted sinking lid policies to aid in the minimisation of gambling harm to their communities.

**(v) How close any venue shall be permitted to any other venue**

As the Venue is existing this matter is not applicable for this application.

**(vi) What the primary activity at any venue is**

The primary activity within the building where the gaming machines are situated is a hotel.

**Conclusion**

The matters required to be considered before making a decision under the Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy have been outlined above.

The application has been publicly notified in accordance with the Policy, to allow community involvement in Council decision making on Class 4 gambling. Five submissions were received on this application, all in opposition.

Council is asked to consider the application in regard to the Policy and, to decide whether or not to grant consent to the Trusts Community Foundation Ltd, for five additional Class 4 gaming machines at the Cosmopolitan Hotel venue, taking the total number of machines at the Venue from six to nine.

Council is also asked to consider adopting a sinking lid policy.

A handwritten signature in black ink, appearing to read 'T. Armstrong', with a stylized, cursive script.

Tarsha Armstrong  
LICENSING INSPECTOR  
BULLER DISTRICT COUNCIL

17 September 2024



**BULLER DISTRICT COUNCIL**

**EXTRAORDINARY MEETING**

**13 NOVEMBER 2024**

**AGENDA ITEM: 4**

**Prepared by** Bronwyn Little  
Senior Policy Advisor

**Reviewed by** Michael Aitken  
Acting Group Manager Regulatory Services

**Attachments**

1. Class 4 Gambling and TAB Venue (current)
2. Class 4 Gambling and TAB Venue Review Statement of Proposal
3. Class 4 Gambling and TAB Venue Review summary - online/paper submissions
4. Class 4 Gambling and TAB Venue Review summary – individual format submissions
5. Class 4 Gambling and TAB Venue Review – full submissions (redacted)

**Public Excluded:** No

**CLASS 4 GAMBLING AND TAB VENUE REVIEW – CONSIDERATION AND HEARING OF SUBMISSIONS TO STATEMENT OF PROPOSAL**

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**1. REPORT SUMMARY**

A total of 29 submissions were received to the Statement of Proposal for the review of the Buller District Council Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy in 2023. Those submitters who wished to present their submissions will be heard at this meeting. This report outlines the process of the review to date, the Statement of Proposal and summarises the submissions for Council to consider in their deliberations. It seeks Council's direction for the preparation of the draft policy.

**2. DRAFT RECOMMENDATION**

**That Council:**

- 1. Receives the submissions to the Statement of Proposal for the review of the Class 4 Gambling and TAB Venue Policy.**

**2. Hears the verbal submissions of those submitters who wished to be heard.**

**3. Considers all the submissions to the Statement of Proposal.**

**4. Either:**

- a. Requests Te Whatu Ora to undertake a Social Impact Assessment to establish to assess the current policy with respect to how well it was meeting the legislative requirement to prevent and minimise gambling related harm and report back to Council with the results for consideration prior to the preparation of a draft policy.**

**OR**

- b. Directs the Chief Executive Officer to prepare a draft Class 4 Gambling and TAB Venue Policy to the Risk and Audit Committee by April 2025 based on the following:**

- i) Status Quo - with OR without new relocation of venues provisions.**

**OR**

- ii) Relocation of venues provisions and restrictions on:**

- Number of machines in district**
- Number of venues in district**
- Location of venues**
- Number of machines in venues.**

**OR**

- iii) Restrictions only (no relocation provisions) on:**

- Number of machines in district**
- Number of venues in district**
- Location of venues**
- Number of machines in venues**

**OR**

- iv) Sinking lid**

### 3. ISSUES & DISCUSSION

#### 3.1 BACKGROUND

The Buller District Council (BDC), under the Gambling Act 2003 and the Racing Industry Act 2020, must have a Class 4 Venue and Board (TAB) Venue Policy. Although there are several types of gambling available in the District including Lotto, scratch tickets, and – increasingly - internet gambling, the Council only has regulatory powers with regard to Class 4 gambling machines (also called pokies), Class 4 Gambling Venues, and stand-alone TAB Venues

The current Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy 2018 (**Attachment 1**) focuses, as required, on non-casino gaming machines and stand-alone TABs. It specifies the circumstances under which gaming machine venues may be established in the District and specifies the maximum number of gaming machines that may be operated at that venue. The Policy also determines how and under what circumstances new standalone TABs may be established in the District.

The Gambling Act 2003 requires Council to set a Class 4 gaming venue policy to influence the extent of, and minimise the negative impacts of, Class 4 gambling in the district. In particular, it enables Council to control where venues can be established and limit the permitted number of gaming machines at each venue.

The purposes of the Racing industry Act 2020 are similar to the Gambling Act 2003, including the prevention and minimisation of harm.

#### 3.2 Review of BDC Policy.

In May 2023 the Regulatory and Hearings Committee adopted a Statement of Proposal outlining options to be considered in the review of Council's Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy. A Statement of Proposal was considered which outlined the background to the review and the matters being considered. See **Attachment 2**.

The matters which were for review were as follows:

- Number of gaming machines in the district
- Number of venues in the district
- Venue location – both Gambling Venues and Board (TAB) venues
- Number of gambling machines per venue
- Relocation of licenses to other venues.

A comprehensive public consultation process was prepared and undertaken. It followed the Special Consultation Procedure as set out in the S. 83 Local Government Act 2002. Public notices were placed as required and the BDC website had a full section dedicated to the consultation with all the relevant documents and a set of Frequently Asked Questions. Stakeholder groups and businesses were also individually notified.

### **3.3 Submissions**

Submissions were invited from the public for a one-month period which ended on 21 August 2023. There was a good response and in total 29 submissions were received as follows:

Submission form type	Number
Online	17
Paper	1
Individual format	11
TOTAL	29

Of these submissions 11 are from stakeholder organisations and the remainder from individuals within the District. Many individuals also noted organisations they were associated with in the District.

### **3.4 Outline of submissions**

Due to the different formats of the submissions received the analysis has been divided into online/paper submissions and those which were individually formatted:

#### **3.4.1 Online/paper submissions:**

There were seventeen online submissions and one paper submission. The online/paper submissions followed the format below:

- Issue
- Preferred Option – status quo, cap, sinking lid
- Comments

**Attachment 3** includes:

- Summary of online and paper submissions
- Statistical analysis of submissions by issue

The response showed:

Question no.	Issue	Option	Responses
4	Number of gaming machines allowed in the district	Status Quo	17.6%
		Set a cap	17.6%
		Sinking lid	64.7%
5	Number of Venues in district	Status Quo	11.7%
		Set a cap	29.4%
		Sinking lid	58.2%
6	Venue location both gambling venues and TAB	Status Quo	17.6%
		Set a cap	41.2%
		Sinking lid	41.1%
7	Number of gambling machines allowed per Class 4 gambling venue	Status Quo	17.6%
		Set a cap	29.4%
		Sinking lid	52.9%
8	Relocation of existing venues	Relocation allowed	35.9%
		Relocation only allowed in certain circumstances	35.3%
		Sinking lid	29.4%

### 3.4.2 Individual format submissions:

These submissions covered the issues raised in the Statement of Proposal and provided a significant amount of background detail and information; **Attachment 4** is a detailed summary of these submissions. Please note that Manatū Hauora/ Ministry of Health advised that they do not make submissions on these matters but provided additional information and statistics for the review. They have not therefore been included in the analysis below. The total number of submissions included is therefore ten.

In very general summary:

Submission form question no.	Issue	Option	Responses
4	Number of gaming machines allowed in the district	Status Quo	70%
		Set a cap	0%
		Sinking lid	30%
5	Number of Venues in district	Status Quo	70%
		Set a cap	0%
		Sinking lid	30%
6	Venue location both gambling venues and TAB	Status Quo	70%
		Set a cap	0%
		Sinking lid	30%
7	Number of gambling machines allowed per Class 4 gambling venue	Status Quo	70%
		Set a cap	0%
		Sinking lid	30%
8	Relocation of existing venues	Relocation allowed	10%
		Relocation only allowed in certain circumstances	60%
		Sinking lid	30%

### 3.5 Social Impact Assessment

Policy reviews must have regard to the social impact of gambling within the District. Gambling has both positive and negative impacts. Positive impacts mainly relate to recreational and community funding benefits, and negative to gambling expenditure and problem gambling costs.

There are three main groups or areas to be considered:

- the groups and organisations that benefit from class 4 gambling by way of grants from gaming societies;
- the populations that are disproportionately harmed by gambling, and
- the economic and entertainment benefits for the community.



As part of the current Statement of Proposal a set of Social Impact Indicators was included and considered. Te Whatu Ora has offered to undertake a full Social Impact Assessment (SIA) in the District to provide further background to assist Council in undertaking the policy review. This information would assist Council to appreciate the current situation regarding what stakeholders are seeing happening in the community and assess the current policy with respect to how well it was meeting the legislative requirement to prevent and minimise gambling related harm. Both Grey and Westland District Councils have undertaken this assessment as part of the review of their policies.

### **3.6 Next Steps**

Council will be hearing from six of the submitters at this meeting and considering all the submissions during deliberations. The next step is to provide staff with direction on the content of the draft policy and Statement of Proposal for initial consideration by the Risk and Audit Committee. The committee will then make a recommendation to the Council. On adoption of the draft policy and Statement of Proposal the public consultation process under Section 83 of the Local Government Act 2002 (Special Consultative Procedure) will begin.

As noted in 3.5 above Te Whatu Ora have offered to undertake a full SIA on this matter. Should Council decide to accept this offer the work would be undertaken prior to the draft being completed. Council would take the SIA into account when making decisions on the content of the draft policy.

## **4. CONSIDERATIONS**

### **4.1 Strategic Impact**

The review of this policy is required by both the Gambling Act 2003 and the Racing Industry Act 2020. By undertaking the review council is fulfilling both its legal and social obligations to address the issue of gambling in the local community

### **4.2 Significance Assessment**

The decisions in this report are not considered to meet the threshold to be considered significant under the Significance and Engagement Policy.

### **4.3 Risk Management Implications**

Public Perception – the public hold diverse views on gambling from those who enjoy gambling for entertainment, those community and sports organisations who benefit from the grants made from the profits of gambling to those who oppose the industry for taking money from those who can least

afford it. Adopting a well-informed effective policy indicates that Council is taking the issue seriously and considering the views of the community and stakeholders.

Strategic – the Review of the policy is required under legislation

#### **4.4 Values**

‘To serve the residents of the Buller district, conscious of their needs, by providing facilities and services and creating an appropriate environment for progress and development while preserving the distinctive natural environment, as well as the cultural and historical environments.’

The Buller District Values are: Community Driven, One Team, Future Focussed, Integrity and We Care. The consideration of submissions to this first stage of engagement of the process shows commitment to all these values.

#### **4.5 Policy / Legal Considerations**

The following are relevant:

- Gambling Act 2003
- Racing Industry Act 2020
- Local Government Act 2002

#### **4.6 Tangata Whenua Considerations**

The decision does not involve a significant decision in relation to ancestral land or a body of water or other elements of intrinsic value, therefore this decision does not specifically impact Tangata Whenua, their culture and traditions.

However, statistics show that Māori are disproportionately impacted by gambling and are 3.13 times likely to experience gambling harm compared with non-Māori.

In 2018, Statistics New Zealand summarised that 11.2% of Buller’s population are Māori.

#### **4.7 Views of Those Affected**

Both the Acts concerned require that if the review indicates the policy should be changed or replaced then the procedures under the Local Government Act 2002 Section 83 - Special Consultative Procedure must be followed. As noted in 3.5 above an SIA process, if agreed to by council, would include stakeholder engagement.

#### **4.8 Costs**

Council staff time and resources will continue to be managed under existing workloads and budgets.

#### **4.9 Benefits**

- Compliance with current legislation
- Opportunity to get community input into the development of the policy as required under the Local Government Act 2002.

#### **4.10 Media / Publicity**

There will be interest from the media in this issue. This will be managed by the Communications team as and when required.



## Buller District Council Policy

### CLASS 4 GAMBLING AND TOTALISATOR AGENCY BOARD (TAB) VENUE POLICY

Source:	Council		
Date:	23/09/2009		
Reviewed:	26/09/2018	Next review:	26/09/2021
See also:	Gambling Act 2003, Racing Act 2003		

#### PURPOSE

To manage the establishment of Class 4 gambling and TAB venues to minimise the adverse effects of gambling on the Buller district.

#### BACKGROUND

This policy applies to Class 4 and Totalisator Agency Board (TAB) gambling, and to Class 4 gambling and TAB venues.

*Class 4 gambling* is gambling that involves the use of gaming machines outside a casino, and from which the profits are distributed to authorised purposes (ie back to the community).

*Class 4 venues* are the licenced premises where gaming machines are located.

*TAB venues* are premises that are owned or leased by the New Zealand Racing Board and where the main business carried on at the premises is providing racing betting or sports betting services under the Racing Act 2003.

## **COUNCIL CONSENT FOR CLASS 4 GAMING MACHINES AND TAB VENUES**

Consent is required from Council for the following:

- To establish a new Class 4 venue.
- To increase the number of gaming machines at an existing Class 4 venue to more than the number operating at that venue on 22 September 2003, or more than the number previously consented to by Council.
- To establish a new TAB venue.
- The first time application is made to the Department of Internal Affairs for a Class 4 venue licence for a venue which did not hold such a licence on 17 October 2001.

Any building which holds a venue consent and which is destroyed or damaged by fire or other hazard may have that consent re-approved without further public notification. Such re-approval will not apply to any relocation of venue.

### **KEY ISSUE ONE**

There are some recognised benefits from allowing Class 4 and TAB gambling. A number of community groups rely on funding from the proceeds of Class 4 gambling. Some members of the community derive entertainment from these forms of gambling, and participate in them responsibly.

### **OBJECTIVE**

To allow those who wish to participate in gaming machine and TAB gambling to do so within the district.

### **POLICY**

Class 4 gambling venues and TAB venues may be established in Buller subject to:

1. Meeting application and fee requirements;
2. The primary activity of the premises being onsite entertainment, recreation, or leisure focused on persons 18 years and over; and
3. The premises being authorised under the Sale of Liquor Act 1989 to sell and supply liquor for consumption on the premises.

## **METHOD OF IMPLEMENTATION**

Applications for Council consent must be on the approved form and must provide:

1. Name and contact details for the application;
2. Street address of premises proposed for the venue;
3. A site plan covering both gambling and other activities proposed for the venue, including details of each floor of the venue and location of each gaming machine or TAB;
4. Details of the proposal including the number of gaming machines or other gambling facility;
5. Details of liquor licence(s) applying to the premises; and
6. Any relevant gambling harm minimisation policy.

Application fees for territorial authority consent will be set annually as part of the Annual Plan process. For the 2009/2010 financial year, the application fee is \$200.00.

The applicant is responsible for meeting the cost of publicly notifying the application.

Applications will not be considered until all of the required information has been received and the application fee has been paid. Council may request additional information if it considers it necessary to making a decision on an application.

## **EXPLANATION/REASONS**

By allowing Class 4 and TAB venues to establish in Buller, we are allowing those who wish to participate in these types of gambling to do so.

By specifying the types of premises which are suitable to be Class 4 and TAB venues, and by requiring applicants for consent to provide detailed information about their proposal before a decision is made on their consent allows us to minimise the potential for adverse effects arising from gambling.



**KEY ISSUE TWO**

There is the potential for gambling to cause harm to individuals, and the community as a whole, especially in cases of problem gambling.

**OBJECTIVE**

To prevent and minimise the harm caused by gambling, including problem gambling.

**POLICY**

The maximum number of gaming machines allowed at Class 4 venues are as follows:

- Class 4 gambling venues licenced after 17 October 2001 shall be allowed a maximum of nine gaming machines.
- Class 4 gambling venues licenced before 17 October 2001 shall be allowed a maximum of 18 gaming machines.

**METHODS OF IMPLEMENTATION**

No single venue will be allowed to exceed the maximum number of gaming machines.

When considering an application for consent, Council will have regard to the characteristics of the venue and may impose a maximum number on the consent that is less than the applicable maximum number above.

**EXPLANATION/REASONS**

Restricting the number of gaming machines that may operate in the district limits the opportunities people have to gamble. Limiting gambling opportunities will help prevent and minimise harm from gambling.

Restricting the types of venues which can be Class 4 venues will assist in the identification of problem gamblers, as they will become recognisable to venue staff. Identifying that somebody has a gambling problem is the first step in preventing harm caused by problem gambling.

**KEY ISSUE THREE**

Council has a responsibility under the Gambling Act 2003 and the Racing Act 2003 with regards to the provision of Class 4 gambling and TAB venues in the district.

**OBJECTIVE**

To ensure the Council and the community has influence over the provision of new gambling venues within the district and additional opportunities for gambling at existing venues.

**POLICY**

In considering all applications relating to Class 4 gambling venues Council may consider any matter, but will consider the following:

- (i) Characteristics of the district and parts of the district.
- (ii) Locations of kindergartens, early childhood centres, schools, places of worship and other community facilities.
- (iii) The number of gaming machines that should be permitted at any venue.
- (iv) The cumulative effects of additional opportunities for gambling in the district.
- (v) How close any venue shall be permitted to any other venue.
- (vi) What the primary activity at any venue is.

In considering all applications relating to TAB venues Council may consider any matter, but will consider the following:

- (i) Characteristics of the district and parts of the district.
- (ii) Locations of kindergartens, early childhood centres, schools, places of worship and other community facilities.
- (iii) The cumulative effects of additional opportunities for gambling in the district.

**METHODS OF IMPLEMENTATION**

The decision on Council consents will be made by full Council following a hearing at which the applicant and everybody who has made a written submission on the application will have the opportunity to be heard.

When considering the cumulative effects of additional opportunities for gambling in the district for Class 4 venues, Council will take into account both the number of gaming machines currently operating, and the number of gaming machines currently able to operate.

**EXPLANATION/REASONS**

Ensuring Council considers the listed matters when determining all applications for consent will help ensure that Council has influence over the establishment of new Class 4 venues and over the provision of additional gaming machines at existing venues, when the resulting number of machines will be greater than the number the venue is currently able to operate.

This will also help ensure that Council exercises its influence consistently across all applications for consent.

Requiring that consideration be given to public submissions, both written and as presented at hearings, will help ensure that the views of the community are taken into account when Council makes decisions on consents.

**KEY ISSUE FOUR**

The impacts of both the benefits and the harm resulting from gambling are felt by the community.

**OBJECTIVE**

To facilitate community involvement in decisions about the provision of gambling.

## **POLICY**

All applications for Council consent will be available for public submission.

Submitters will have the opportunity to speak to their submission at the hearing of the consent application.

In making their decision Council will give consideration to all submissions received.

## **METHODS OF IMPLEMENTATION**

All applications will be twice publicly notified in a newspaper circulating in the area to which the application relates. Notifications will be placed at least seven days apart, but no more than 14 days apart. Council staff will be responsible for placing the public notifications.

The public notifications will advise people of the opportunity to make a written submission on the application.

Copies of the application will be made available at Council offices, Buller libraries and on Council's website. Information will be included on the opportunity to make a written submission.

## **EXPLANATIONS/REASONS**

Community feelings on gambling range from full support to total opposition.

Supporters of gambling often note the following benefits:

- The money distributed to community groups and organisations from the proceeds of Class 4 gambling.
- The entertainment value of responsible gambling.

Opponents of gambling often note the following harmful effects of gambling:

- The amount of money spent and lost by gamblers.
- Problem gambling and the impact this has on the life of the gambler, their family and the community as a whole.

Giving all members of the community the opportunity to comment on applications for consent to create additional gambling opportunities will help ensure that the full range of opinions and issues are heard and taken into account when Council makes its decision on an application.



# STATEMENT OF PROPOSAL

**OPTIONS TO AMEND  
BULLER DISTRICT  
COUNCIL'S CLASS 4  
GAMBLING AND  
TOTALISATOR AGENCY  
BOARD (TAB) VENUE  
POLICY**

Buller District Council

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## STATEMENT OF PROPOSAL

### OPTIONS TO AMEND BULLER DISTRICT COUNCIL'S CLASS 4 GAMBLING AND TOTALISATOR AGENCY BOARD (TAB) VENUE POLICY

Gaming machines or 'pokies' in pubs and clubs are classified as 'Class 4' gambling. Every Territorial Authority (Council) in New Zealand must adopt a policy on Class 4 gambling venues, and that policy must be reviewed every three years.

Buller District Council's Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy 2018 is currently under review. During this review Council will consider options to amend the policy. We are seeking feedback from the community on proposed options for:

- Number of gaming machines in the district
- Number of venues in the district
- Venue location – both Gambling Venues and Board (TAB) venues
- Number of gambling machines per venue
- Relocation of licenses to other venues.

This Statement of Proposal has been prepared in accordance with section 83 of the Local Government Act 2002. It includes information about the review process and on the proposed options which the Council will consider to amend the policy.

### MAKING A SUBMISSION

The consultation period is between the 24 July and 21 August 2023. There are several ways you can find out more about the review of the Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy

- Download the Statement of Proposal and the current Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy 2018 from Council's website.
- Consultation Documents and submission forms can be collected from Council's offices and libraries in Westport and Reefton, i-Sites, and Resource Centres across the district.
- Make a submission online through Council's website.
- Download the submission form from Council's website and drop it off at Council's offices in Westport and Reefton or send them to Buller District Council, PO Box 21, Westport 7866.

You can request copies or ask questions by sending an email to [info@bdc.govt.nz](mailto:info@bdc.govt.nz) with the subject **Gambling Policy**.

### The next stages are:

- After the consultation period has finished, Buller District Council will hold a hearing where members of the public who have made a written submission can choose to speak to their submission.
- Council will deliberate and decide about whether or not to amend the current policy.



## BACKGROUND

### Introduction

The Buller District Council, under the Gambling Act 2003 and the Racing Industry Act 2020, must have a Class 4 Venue and Board (TAB) Venue Policy. Although there are several types of gambling available in the District including Lotto, scratch tickets, and – increasingly - internet gambling, the Council only has regulatory powers with regard to Class 4 gambling machines (also called pokies), Class 4 gambling Venues, and Board (TAB) Venues (stand-alone TABs).

The Class 4 Gambling and Totalisator Agency Board (TAB) Venue Policy 2018 focuses on non-casino gaming machines (pokies) and Board (TAB) Venues (stand-alone TABs). It specifies the circumstances under which gaming machine venues may be established in the District and specifies the maximum number of gaming machines that may be operated at that venue. The Policy also determines how and under what circumstances new stand alone TABs may be established in the District.

The under Section 3 of the Gambling Act 2003 the purpose of the Act is outlined. Some of these objectives can be used to guide council in the making of the policy regarding gambling venues. In particular the following are included in the purposes of the ACT:

- Control the growth of gambling
- Prevent and minimise harm from gambling, including problem gambling
- Facilitate community involvement in decisions about the provision of gambling

The current policy is under review and Council is taking the opportunity to ask the community for their opinion on how gambling and TAB venues should be managed in the future. The options available are around the following questions:

- Number of gaming machines in the district
- Number of venues in the district
- Venue location – both Gambling Venues and Board (TAB) venues
- Number of gambling machines per venue
- Relocation of licenses to other venues.

### What are Class 4 Gambling Venues?

Class 4 gambling venues are places outside of casinos (usually pubs, restaurants or clubs) where electronic gaming machines (EMGs), i.e. pokies, are operated.

### What are Board (TAB) venues?

A Board (TAB) Venue is any premises owned or leased by the New Zealand Racing Board and where the main business carried out is providing racing-betting or sports-betting services. These are standalone venues and do not include TAB outlets or agencies that are additional activities of a bar or hotel, such as self-service TAB terminals.



### **How is gambling controlled in New Zealand?**

The oversight of Class 4 Gambling venues and TAB venues sits with the Department of Internal Affairs (DIA) which is responsible for the licensing of operators. The DIA also regulates, audits and investigates all types of gambling activity.

Councils are responsible for issuing consents to venues that wish to provide Class 4 or TAB gambling services.

Council Gambling and TAB venue policies specify:

- where new Class 4 venues and TAB venues may be located; and
- the number of machines that can operate in the venue.

Venue policies cannot take away licences that have already been granted.

Class 4 gambling and TAB operators must hold both an operator's and a venue license.

### **Buller District Council's current policy**

The main purpose of the current policy is to manage the establishment of Class 4 gambling and TAB venues to minimise the adverse effects of gambling on the Buller district.

Where venues may be established:

Buller District Council's current policy places restrictions on the type of premises that new Class 4 gambling and TAB venues may be established being as follows:

- The primary activity of the premises being onsite entertainment, recreation, or leisure focused on persons 18 years and over; and
- The premises being authorised under the Sale of Liquor Act 1989 to sell and supply liquor for consumption on the premises.

Maximum Number of Gaming Machines:

A maximum number of gaming machines set per venue with those venues licenced after 2001 being limited to nine gaming machines.

Applications and public submissions:

Applications for gambling and TAB facilities must be made to council and these applications are available for the public to make submissions on. A hearing will be held if submitters wish to speak to submissions and council will consider all submissions. Council will consider factors such as the characteristics of the district, location of community facilities (e.g. schools and early childhood centres) and the cumulative effects of any other nearby venues.



### **Current Situation:**

As of March 2023 in Buller District there are a total of 72 Electronic Gaming Machines (EGMs) spread across 8 separate venues. There are five venues in Westport (53 EGMs), two venues in Reefton (15 EGMs) and one venue in Karamea (4 EGMs).

### **Social Impact Indicators and Consideration**

Policy reviews must have regard to the social impact of gambling within the District. Gambling has both positive and negative impacts. Positive impacts mainly relate to recreational and community funding benefits, and negative to gambling expenditure and problem gambling costs.

There are three main groups or areas to consider:

- the groups and organisations that benefit from class 4 gambling by way of grants from gaming societies;
- the populations that are disproportionately harmed by gambling, and
- the economic and entertainment benefits for the community.

An overview of the current situation in the community in regard to the above matters is attached as Attachment 1.

It includes information on:

- Electronic Gaming Venues and Machines
- Gaming Machine Proceeds (GMP)
- Socioeconomic deprivation
- Support Services uptake
- Grants

In summary the following has been identified:

- The population of Buller has a relatively high exposure rate to gambling opportunities, particularly in Westport and Reefton.
- Over time gaming machine profits have increased but at a rate considerably lower than the national figure
- The decrease in the number of machines and increase in profits indicates that players are spending longer hours playing gaming machines, betting more per game or more players are playing pokie machines
- Sports groups in particular benefit from grants from the gambling trusts in Buller

- Buller has an extremely high level of socioeconomic deprivation and all current venues are located in areas with a level of 9 or 10.
- The number of people seeking help from gambling harm advice service providers has increased rapidly in recent years.

#### **POLICY REVIEW:**

##### **Matters for consideration:**

Council has a number of matter to consider and evaluate for effectiveness while taking into account the social impact of ambling and also the overall objective to prevent and minimise harm from gambling in the community.

Under the Gambling Act 2003, Council's policy:

- Must specify whether or not Class 4 venues may be established and, if so, where they may be located within the District;
- May specify any restrictions on the maximum number of gaming machines that may be operated at a venue, and;
- May include a relocation policy.

The Gambling Act 2003 sets a maximum number of nine machines for new venues. Council is able to set a lower limit through its policy. Council cannot close Class 4 gaming venues.

Under the Racing Industry Act 2020, Council's policy:

- Must specify whether or not new TAB venues may be established and, if so, where they may be located within the District

##### **Issues to be addressed in the Policy:**

There are a number of issues which need to be addressed in the policy. Council has been looking at various options to address each of these issues and are seeking the community's input thorough submissions into the final decision.

- Number of gaming machines in the district
- Number of venues in the district
- Venue location – both Gambling Venues and Board (TAB) venues
- Number of gambling machines per venue
- Relocation of licenses to other venues

<b>Number of Gaming Machines Allowed in the District</b>	
<b>Option a.</b>	
Status Quo	Currently there is no limit on the number of venues in the District. Applications are received and considered on their merits and are evaluated on the matters set out in the Policy in Key Issue three.
Analysis	
<p>This approach allows for venues to be established provided applications are successful. Whilst the cumulative effects of additional opportunities to gamble in the district is one of the matters for consideration it is just one of the matters for consideration nor is it prioritised. The community has no indication of how many venues could be established in the district. Given the district's socioeconomic deprivation level it also likely increases the risk of harm to vulnerable members of the community.</p> <p>It is enabling for businesses and allows for growth in the positive outcomes of gambling including entertainment opportunities, economic benefits for local business and the availability of funding.</p>	
<b>Option b.</b>	
Set a cap - limit the number of gaming machines across the district	Some councils have policies which limit the number of machines in their areas. This is usually based on the size of the adult population and a ratio. The ratio can be the national average (36 machines per 10,000 adult population) or another figure. Some limits are set at the total of machines at the time the policy was introduced, in this case 72.
Analysis	
<p>This policy gives both businesses and the community reassurance regarding the future opportunities for gambling machines in the district.</p> <ul style="list-style-type: none"> <li>• Having a cap at the national average would limit the number of machines to 36 per 10,000 adults which would bring the actual number permitted well below the current number operating. It would effectively be a sinking lid policy until that number was reached.</li> <li>• Limiting the number to 72 would mean that no new machines were permitted unless the number of machines in the District dropped.</li> </ul>	



<b>Option c.</b>	
Sinking Lid	No new gaming machines permitted
Analysis	
<p>This approach provides the most effective way to reduce gambling harm by not allowing for the replacement of any machines going forward, regardless of the total number in the District. It may have some negative impact on the benefits of gambling such as employment, social entertainment, and funds available from trusts.</p>	

<b>Number of Venues in the District</b>	
<b>Option a.</b>	
Status Quo	No limit (Key Issue 1)
Analysis	
No limit on the number of venues however each application would be assessed against the criteria in the policy.	
<b>Option b.</b>	
Set a cap on number of venues	The cap could be the current number (8) or the national average of 2.6 venues per 10,000 adult population (currently Buller has an average of 10 venues per 10,000 adult population)
Analysis	
A cap on the number of venues would limit the number of gambling venues available to the community. If the national average cap was put into place it would effectively be a sinking lid policy until the number had been reached. By itself it will not reduce the possible number of machines in the district. It could also limit local businesses opportunities to operate as gambling venues as it may become uneconomic to operate with fewer machines	
<b>Option c.</b>	
Sinking lid	Prevent new gaming machine venues from opening and no venue replaced
Analysis	
This option would reduce the number of venues over time and prevent new venues from opening. It would mean there were no further local businesses opportunities to operate as gambling venues.	

<b>Venue Location – Both Gambling Venues and TAB</b>	
<b>Option a.</b>	
Status quo	No detailed restrictions stated (Key Issue 3) but includes general references to sensitive sites such as schools
Analysis	
Existing guidance does not provide any certainty for the applicant, the submitter or the community. Some of the matters for consideration are set out but no specifics are given. Under the Act, the Council must have regard to the location of kindergartens, early childhood centres, schools, places of worship and other community facilities when considering the location of Class 4 venues, as well as the general characteristics of the District.	
<b>Option b.</b>	
Limit venues to commercial areas with buffer zones	This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also include a 50m 'buffer zone' around established sensitive uses (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae)
Analysis	
The intention of this limitation is to prevent the normalisation of gambling for children, limit cultural offence, and reduce the potential of gambling related harm. Research has shown that living in close proximity to gambling venues increases the potential for problem gambling. Location restrictions might be considered to be more effective than reducing machine numbers to achieve these outcomes or add to the effectiveness if used in combination.	
<b>Option c.</b>	
Sinking Lid	No further venues regardless of location
Analysis	
Any reference to location would be redundant as no new venues would be permitted nor would any venues have the opportunity to apply to relocate.	

<b>Number of Gaming Machines Allowed per Class 4 Gambling venue</b>	
<b>Option a.</b>	
Status Quo	Maximum number : <ul style="list-style-type: none"> <li>• Licenced after 17 October 2001 – 9</li> <li>• Licenced before 17 October 2001 - 18</li> </ul>
Analysis	
This approach reflects the Gambling Act 2003, Sections 92 and 93. It gives both operators and the community certainty around the number of machines that will be permitted and complies with the Act.	
<b>Option b.</b>	
Set a cap - limit the number of gaming machines per venue	Some councils have policies which specifically limit the number of machines per venue. Some limit the number of machines to a lesser number (e.g. 4) than that allowed under the Act for a specific period, such as 6 months to give Council an opportunity to review the venue operation prior to the allowing the maximum number of 9.
Analysis	
A limit lower than that permitted under the Act lessens the exposure of at risk individuals to gambling opportunities however in itself, without a maximum number of machines and venues across the district it would seem to do little to assist. It could, without the other restrictions, lead to gambling opportunities being available across more venues. Providing for a lower number in the establishment period would seem unnecessary the DIA oversees all licences and compliance.	
<b>Option c.</b>	
Sinking Lid	No new gaming machines permitted
Analysis	
This approach provides the most effective way to reduce gambling harm by not allowing any new machines. It may have some negative impact on the benefits of gambling such as employment, social entertainment, and funds available from trusts.	

<b>Relocation of existing venues</b>	
The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.	
<b>Option a.</b>	
Relocation allowed	This option would allow any current Class 4 Venues to relocate, as long as the new venue was within a location permitted under the Policy
Analysis	
This option would enable current businesses to continue operating their machines, potentially in a more financially viable venue. However it will not reduce the number of machines in the District	
<b>Option b.</b>	
Relocation only allowed in certain circumstances	Relocation would be treated as an application for a new venue under certain circumstances: <ul style="list-style-type: none"> <li>• The current venue must be relocated due to extenuating circumstances such as (but not limited to) fire or natural disaster.</li> <li>• The current venue is located outside of a permitted area for new venues, and is proposing to relocate into a permitted area</li> </ul>
Analysis	
This option is intended to potentially assist in decreasing the number of gaming machines in the district, consistent with the general approach of the policy. However, it also provides for local businesses that are experiencing extenuating circumstances and encourages certain current venues to relocate to more desirable areas without being penalised.	
<b>Option c.</b>	
Sinking Lid	No venues permitted to relocate
Analysis	
If a venue ceased to operate, regardless of the circumstances, the number of machines previously operating in that venue would not be able to be relocated elsewhere.	

## ATTACHMENT 1

**SOCIAL INDICATORS OVERVIEW AND ASSESSMENT****Where are we now:**

The matters outlined below are considered to be indicators of the level of risk that residents experience in relation to the problems that gambling can pose. These problems include financial strain, family problems and social harm.

*Please note: Unless otherwise stated the following data tables been compiled for Buller District by the data science company DOT as part of the Buller District Council Community Compass data set. They use data from many sources to provide a picture of what is happening in the district.*

*Please note that the information provided below is based on an estimated total population as at September 2021 of 9,665. The figures used are based on the estimated calculations per 10,000 (10K) adult (18 years plus) people to allow for comparisons to be made between other communities and New Zealand as a whole. They are the most recent figures available being December 2022.*

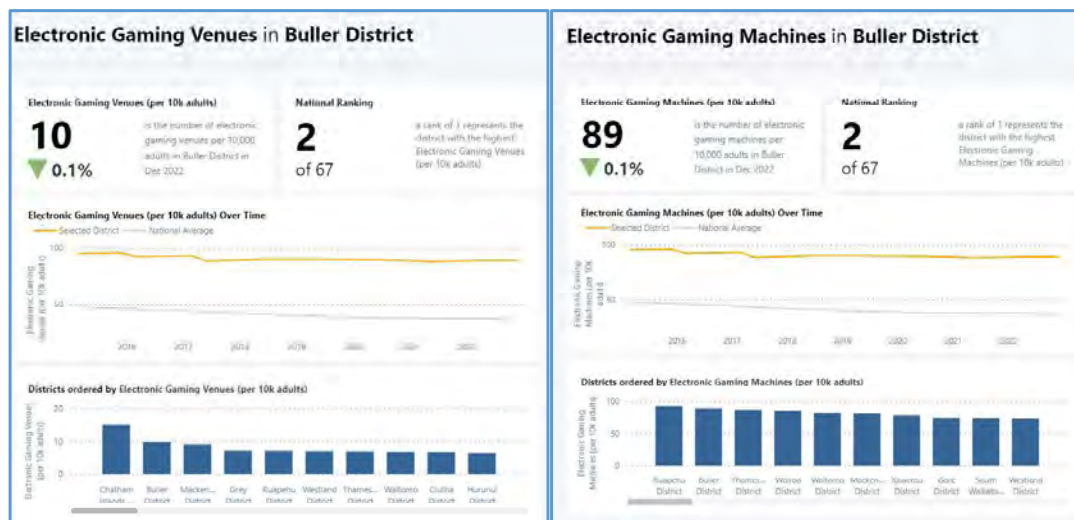
**Electronic Gaming Venues and Machines in Buller District**

The density of gaming machines is important because research has shown that the more opportunities there are to gamble, the more at risk the community can be of experiencing gambling related harm. Gambling density comprises of two components:

- Number of gaming machines per person; and
- Expenditure per person.

Electronic Gaming Venues and Machines in Buller District per 10K adults:





Buller District has the second highest number of both gaming venues and gaming machines in New Zealand. The National Average for Gaming Venues is 2.6 per 10K adults and for Gaming Machines it is 36.4 per 10K adults. Comparing Buller with similar districts Westland District is ranked 6<sup>th</sup> with 7 Gaming Venues and 10<sup>th</sup> with 73 machines per 10K adults.

These figures indicate that Buller District residents have a much greater exposure to Class 4 gambling than the national population.

### Gaming Machine Proceeds (GMP)

These figures show the amount of money lost by individuals through electronic gaming machines over a given period divided by the adult population (over 18 years old). The DIA monitors every gaming machine electronically; therefore expenditure data on gaming machines is accurately recorded and attributed.



In December 2022 the national average was \$68 and by comparison in Westland District it was \$64. With a figure of \$87 Buller District ranks 19<sup>th</sup> out of the 67 local authorities in New Zealand.

From the March 2015 to December 2022 quarters, GMP for Buller District increased by a total of \$125,864 or by 21.8% compared to New Zealand as a whole which increased by 41.1%.

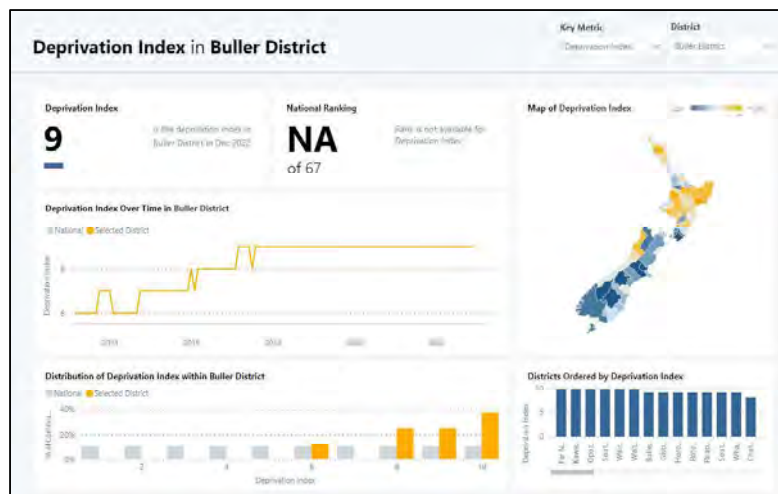
The DIA have calculated the GMP for Buller District in the year to December 2022 to be a total of **\$2,545,217.43** .

### Socioeconomic deprivation:

Approximately 50% of all EGM venues in New Zealand are clustered in geographic areas representing the three most socioeconomically deprived populations (ie, poorest areas of the country, those with the highest deprivation scores of 8 to 10). In economic terms, these are the groups who can least afford the financial losses from gambling, who experience the lowest returns from gambling proceeds to their communities, and who can least afford the health harm arising from risky gambling activity (Problem Gambling Foundation, Fact Sheet 01/Dec 2019).

The Health and Lifestyles Survey 2016 found that gambling harm is experienced disproportionately by those living in areas with a high New Zealand Deprivation index score (8/10 or higher), who were 4.5 times as likely to experience gambling-related arguments or money problems related to gambling. (<https://www.hpa.org.nz/research-library/research-publications/new-zealanders-participation-in-gambling-results-from-the-2016-health-and-lifestyles-survey> )

Deprivation Scores for populations in NZ are based on Census variables around Employment, Crime, Housing, Health, Education and Access to Services. The resulting scores range from 0 (lowest level of deprivation) to 10 (highest level of deprivation).



Each of the communities (Statistical Areas level 2 or SA2) identified in the census in Buller District has been ranked using the variables identified. The score for the district overall is 9. Based on this information the majority (87%) of Buller District has been classified as having a deprivation score of between 8 and 10. These scores are high and place Buller 8<sup>th</sup> out of 67 local authority areas.

All the venues and EGMs are located in Westport, Reefton and Karamea which have scores of either 9 or 10 on the index.

### Support Services:

To address the potential 'harms' of gambling there are a range of problem gambling service providers across New Zealand, some of which specifically target ethnic groups most at risk from harm (Māori, Pacific Island and Asian).

Funding for the development and implementation of problem gambling intervention services in New Zealand comes from the problem gambling levy, which is collected from gambling proceeds by the Inland Revenue Department. The Ministry of Health (MoH) is charged with funding and coordinating intervention services which are then delivered by a range of service providers by contractual agreement. In addition, the Gambling Helpline is available 24 hours a day, 7 days a week.

The Ministry of Health provides Intervention client data which represents the number of clients who have received gambling harm treatment services and who have identified to the service provider a primary problem gambling mode causing them harm.

This data shows that for the years from July 2004 and to June 2020 between 1 and 6 clients were assisted in Buller District each year however for the period July 2020 to June 2021 that number jumped to 54 and for July 2021 to June 2022 the number of clients was 81.

This latest statistic represents .84% of all clients assisted in New Zealand in 2021/2022, the

population of Buller District makes up only .18% of the total New Zealand population.

#### Grants to Buller:

The major benefit of Class 4 gambling to the community is in the form of grants. Pokie trusts must pay the current minimum of 40% of GMP to community groups New Zealand wide in the form of authorised purpose grants. These are meant to benefit the community by funding non-profit organisations.

Authorised purposes include amateur sport, charity, non-commercial purposes with community benefits, and the operation of racing. The table below shows grants made from 2019 to June 2022 by general category. In total \$1,094,969 was granted to Buller organisations in this period.

Category 1	2019	2020	2021	2022 (Jan - June)
Sport	\$212,630	\$127,379.36	\$199,734.05	\$331,522.7
Community	\$52,279	\$10,999.5	\$33,681.39	\$67,526.4
Health / Welfare / Rescue Services	\$15,964	\$9,797	\$3,500	
Research and Education	\$3,000	\$1,912.56	\$7,000	\$5,072.38
Arts and Culture		\$8,689		
Unspecified				\$4,282.06

Details of which groups received grants can be found on the [granted.govt.nz](https://www.granted.govt.nz/dashboard.html) website (<https://www.granted.govt.nz/dashboard.html>).

Sport is the biggest recipient of grants – with Buller Rugby Union receiving the greatest proportion by some way with a total of \$236,256 over the period. Buller Basketball Association received \$65,210 and Reefton Trotting Club received \$50,000 over the same period.

In the years 2019 to 2021 the return of GMPs directly to the Buller area is outlined below:

Year	GMP	Grants (granted.govt.nz)
2019	\$2,235,480	\$283,873
2020	\$2,006,951	\$158,776
2021	\$2,418,000	\$243,915
TOTAL	\$6,660,431	\$686,564

Over this period of time the return of Buller generated GMP to the Buller community directly was **10.3%**. Distribution to national or regional groups will also benefit people in our community who need or use the services these organisations provide locally. Unfortunately, this figure would be almost impossible to calculate.

CLASS 4 GAMBLING AND TAB VENUE REVIEW  
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## SUMMARY – ONLINE AND PAPER SUBMISSIONS

Submission Form Issues and Options	
Q1-Q3	Administration matters
Q4	<p><b>Issue one</b> <b>Number of gaming machines allowed in the district</b> Page 6, Statement of Proposal Options</p> <ul style="list-style-type: none"> <li>• Status Quo - Currently there is no limit on the number of venues in the district. Applications are received and considered on their merits and are evaluated on the matters set out in the Policy in Key Issue three.</li> <li>• Set a cap - limit the number of gaming machines across the district. Some councils have policies which limit the number of machines in their areas. This is usually based on the size of the adult population and a ratio. The ratio can be the national average (36 machines per 10,000 adult population) or another figure. Some limits are set at the total of machines at the time the policy was introduced, in this case 72.</li> <li>• Sinking lid - No new gaming machines permitted.</li> </ul>
Q5	<p><b>Issue two:</b> <b>Number of venues in the district</b> Page 8, Statement of Proposal Options</p> <ul style="list-style-type: none"> <li>• Status Quo - No limit (see key Issue one).</li> <li>• Set a cap on number of venues - The cap could be the current number (8) or the national average of 2.6 venues per 10,000 adult population (currently Buller has an average of 10 venues per 10,000 adult population).</li> <li>• Sinking lid - Prevent new gaming machine venues from opening and no venue replaced.</li> </ul>
Q6	<p><b>Issue three:</b> <b>Venue location both gambling venues and TAB</b> Page 9, Statement of Proposal Options</p> <ul style="list-style-type: none"> <li>• Status Quo - No detailed restrictions stated (Key Issue 3) but includes general references to sensitive sites such as schools.</li> <li>• Limit venues to commercial areas with buffer zones - This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also include a 50m 'buffer zone' around established sensitive uses buffer zones (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae).</li> <li>• Sinking Lid - No further venues regardless of location.</li> </ul>
Q7	<p><b>Issue four:</b> <b>Number of Gaming Machines Allowed per Class 4 Gambling venue</b> Page 10, Statement of Proposal Options</p> <ul style="list-style-type: none"> <li>• Status Quo - Maximum number Licenced after 17 October 2001 – 9 and for Licenced before 17 October 2001 - 18.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Set a cap - limit the number of gaming machines per venue. Some councils have policies which specifically limit the number of machines per venue. Some limit the number of machines to a lesser number (e.g. 4) than that allowed under the Act for a specific period, such as 6 months to give Council an opportunity to review the venue operation prior to the allowing the maximum number of 9.</li> <li>• Sinking Lid - No new gaming machines permitted.</li> </ul>
Q8	<p><b>Issue five:</b> <b>Relocation of existing venues</b> Page 11, Statement of Proposal Options</p> <ul style="list-style-type: none"> <li>• Relocation allowed - This option would allow any current Class 4 Venues to relocate, as long as the new venue was within a location permitted under the policy.</li> <li>• Relocation only allowed in certain circumstances - Relocation would be treated as an application for a new venue under certain circumstances e.g. the current venue must be relocated due to extenuating circumstances such as (but not limited to) fire or natural disaster and/or the current venue is located outside of a permitted area for new venues, and is proposing to relocate into a permitted area.</li> <li>• Sinking Lid - No venues permitted to relocated.</li> </ul>

## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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SUMMARY OF ONLINE AND PAPER SUBMISSIONS BY SUBMITTER		
No.	Submitter	Responses
1	Jason Sellaiah	Q4 Sinking lid Q5 Sinking lid Q6 Sinking lid Q7 Sinking lid Q8 Relocation allowed
2	Melissa Salter	Q4 Set a cap Q5 Set a cap Q6 Set a cap Q7 Set a cap Q8 Relocation only allowed in certain circumstances
3	Amarni Noble	Q4 Sinking lid Q5 Sinking lid Q6 Sinking lid Q7 Sinking lid Q8 Sinking lid
4	Tessa Spillane	Q4 Sinking lid Q5 Sinking lid Q6 Set a cap Q7 Set a cap Q8 Sinking lid
5	Toroa	Q4 Sinking lid Q5 Sinking lid Q6 Sinking lid Q7 Sinking lid Q8 Sinking lid
6	Ella Skilton	Q4 Set a cap Q5 Set a cap Q6 Set a cap Q7 Set a cap Q8 Relocation allowed
7	Alexis	Q4 Set a cap Q5 Set a cap Q6 Set a cap Q7 Set a cap Q8 Relocation allowed
8	Georgia	Q4 Sinking lid Q5 Sinking lid Q6 Set a cap Q7 Sinking lid Q8 Relocation only allowed in certain circumstances
9	Lyra	Q4 Sinking lid Q5 Sinking lid Q6 Sinking lid Q7 Sinking lid Q8 Relocation only allowed in certain circumstances



## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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10	Leviticus	Q4 Status Quo – <i>I work at a venue</i> Q5 Status Quo Q6 Status Quo Q7 Status Quo Q8 Relocation allowed
11	Keana Anderson	Q4 Sinking lid Q5 Sinking lid Q6 Sinking lid Q7 Sinking lid Q8 Relocation only allowed in certain circumstances
12	Eden Knox	Q4 Sinking lid Q5 Set a cap Q6 Set a cap Q7 Set a cap Q8 Sinking lid
13	Ryley	Q4 Sinking lid Q5 Sinking lid Q6 Set a cap Q7 Sinking lid Q8 Relocation only allowed in certain circumstances
14	Ivan Krantz	Q4 Sinking lid - <i>I have seen first hand the damage that poker machines do and would like to see them banned.</i> Q5 Sinking lid - <i>I have seen first hand the damage that poker machines do and would like to see them banned.</i> Q6 Sinking lid - <i>I have not seen the same level of addiction to TAB gambling as for poker machines.</i> Q7 Sinking lid - <i>I have seen first hand the damage that poker machines do and would like to see them banned.</i> Q8 Sinking lid - <i>I have seen first hand the damage that poker machines do and would like to see them banned.</i>
15	Brooke	Q4 Status Quo Q5 Set a cap – <i>cap at current number</i> Q6 Status Quo - <i>We are too small to make these restrictions</i> Q7 Status Quo Q8 Relocation allowed
16	Don Martin	Q4 Status Quo Q5 Status Quo Q6 Status Quo * Q7 Status Quo Q8 Relocation allowed*  * Venue Relocation A new venue consent will be issued by Council in the following circumstances: <ul style="list-style-type: none"> <li>• Where the venue is intended to replace an existing venue within the district;</li> <li>• Where the existing venue operator consents to the relocation; and</li> </ul>

## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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		<ul style="list-style-type: none"> <li>Where the proposed new location meets all the other requirements in this policy. In accordance with section 97A, 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), when the new venue is established following a consent being granted under this relocation provision, the old venue is treated as if no gaming machine venue licence was ever held for the venue. The old venue will therefore require a Council consent before being relicensed to host gaming machines and will be limited to a maximum of 9 machines if such a consent is granted.</li> </ul>
17	Lisa Gregory	Q4 Sinking lid Q5 Sinking lid Q6 Sinking lid Q7 Sinking lid Q8 Relocation only allowed in certain circumstances
18	A L Newnham	Q4 Sinking lid Q5 Sinking lid Q6 Set a Cap Q7 Sinking lid Q8 Relocation only allowed in certain circumstances  <i>Generally many people in communities are 'financially challenged' and in some cases gambling can lead to addiction and further financial problems</i>

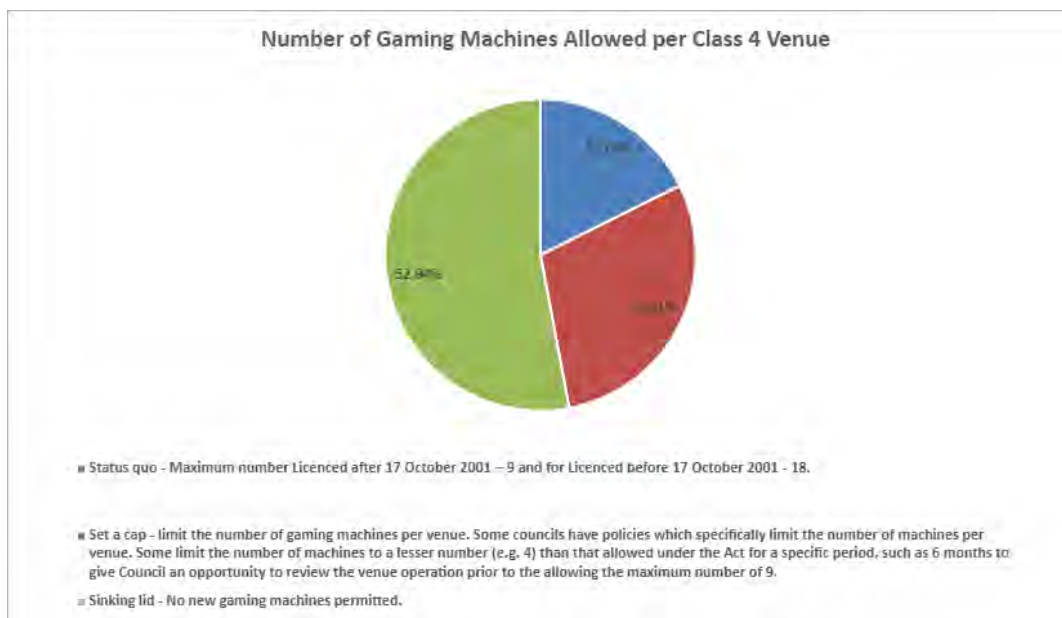
CLASS 4 GAMBLING AND TAB VENUE REVIEW  
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SUMMARY OF ONLINE AND PAPER SUBMISSIONS BY ISSUE

Issue 1

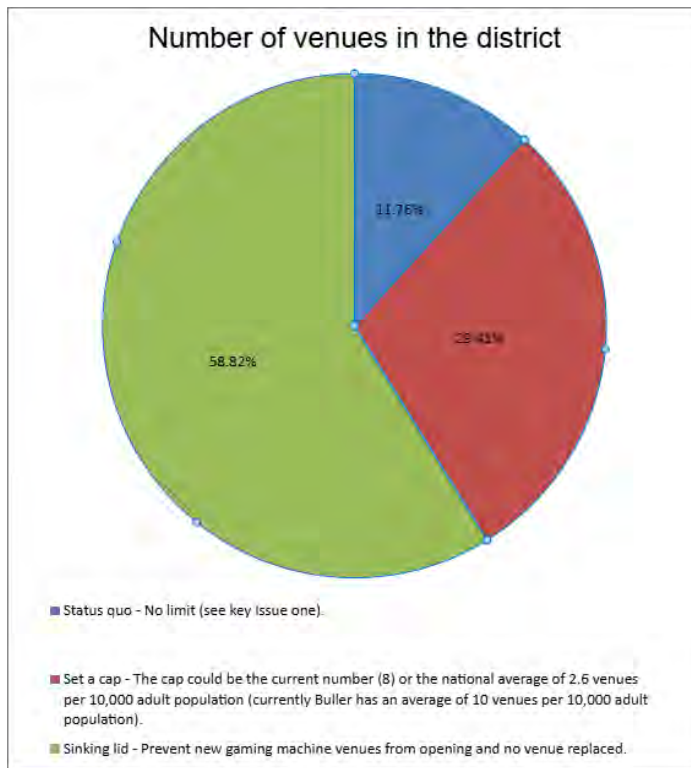


ISSUE 2



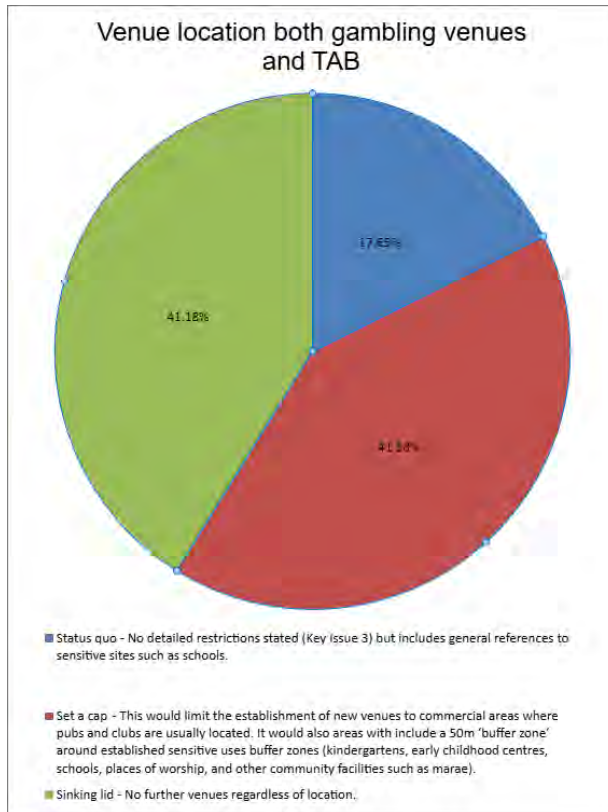
CLASS 4 GAMBLING AND TAB VENUE REVIEW  
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## ISSUE 3



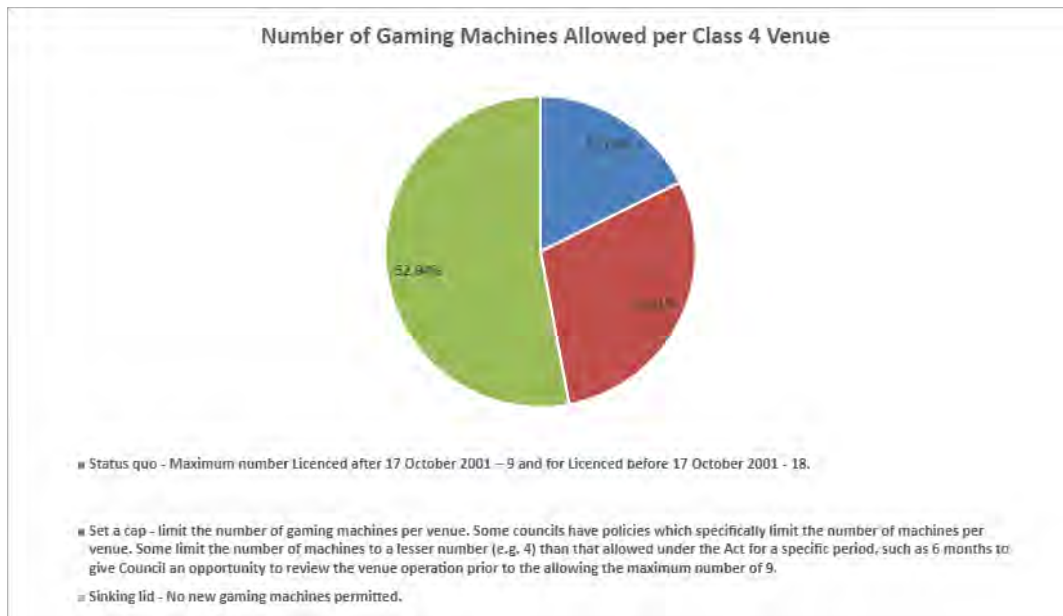
CLASS 4 GAMBLING AND TAB VENUE REVIEW  
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## ISSUE 4

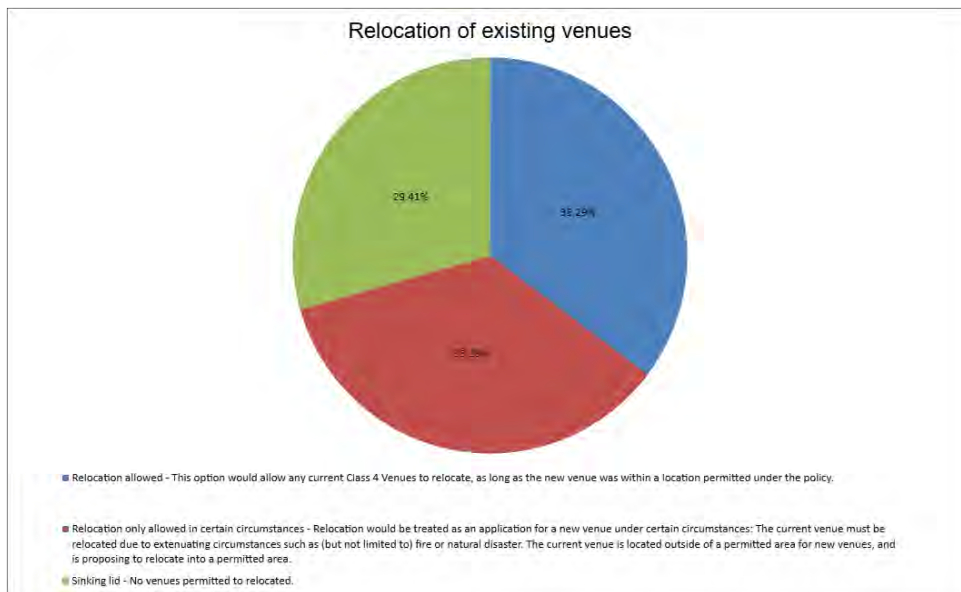


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## ISSUE 5



## ISSUE 6



## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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SUMMARY OF INDIVIDUAL FORMAT SUBMISSIONS BY SUBMITTER		
No.	Submitter	Responses
19	Reefton Powerhouse Charitable Trust	<p><b>Status Quo</b></p> <p><b>Relocation of existing venues – relocation only allowed in certain circumstances</b></p> <ul style="list-style-type: none"> <li>• Number of Gaming Machines in District – Status Quo</li> <li>• Number of Venues in the District – Status Quo</li> <li>• Venue Location, both gambling venues and TAB – Status Quo</li> <li>• Number of Gambling Machines allowed per Class 4 Gambling Venue – Status Quo</li> <li>• Relocation of existing venues – relocation only allowed in certain circumstances.</li> <li>• Existing policy is reasonable.</li> </ul> <p>Importance of access to grants from gaming for many community groups enables positive outcomes across the district which would otherwise be very difficult to achieve.</p>
20	Reefton Trotting Club	<p><b>Status Quo</b></p> <p><b>Relocation of existing venues – relocation only allowed in certain circumstances</b></p> <ul style="list-style-type: none"> <li>• Number of Gaming Machines in District – Status Quo</li> <li>• Number of Venues in the District – Status Quo</li> <li>• Venue Location, both gambling venues and TAB – Status Quo</li> <li>• Number of Gambling Machines allowed per Class 4 Gambling Venue – Status Quo</li> <li>• Relocation of existing venues – relocation only allowed in certain circumstances.</li> <li>• For the reasons that data indicates that the incidence of problem gambling in the district is very low, the status quo would be sensible.</li> </ul> <p>Importance of access to grants from gaming for many community groups enables positive outcomes across the district which would otherwise be very difficult to achieve.</p>
21	Hospitality NZ	<p><b>Status Quo</b></p> <p><b>Relocation provision should be included</b></p> <p>ABOUT:</p> <ul style="list-style-type: none"> <li>• Member -led not-for-profit representing around 3000 businesses</li> <li>• Promote the industry, partner with government to prevent restrictive legislation, protect commercial interests and spearhead innovation</li> </ul> <p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> <li>• Support relocation provision – relocation from high-deprivation areas to more suitable lower deprivation areas should not be reliant on reasons beyond venue operator's control. Relocation is a harm minimisation tool</li> </ul>



## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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		<ul style="list-style-type: none"> <li>Support current discretionary open policy be retained – case-by-case basis having regard to criteria in the policy and after public notification an public hearing.</li> </ul>
22	Gaming Machine Association of NZ	<p><b>Status Quo</b></p> <p><b>Relocation in certain circumstances</b></p> <p>INTRODUCTION</p> <ul style="list-style-type: none"> <li>represents the vast majority of the gaming machine societies that operate in New Zealand.</li> </ul> <p>SUMMARY</p> <ul style="list-style-type: none"> <li>relocation provision be included. Relocation is a harm minimisation tool. Venues should be able to relocate in any circumstances when the applicant can demonstrate that the new site is more desirable from a harm minimisation perspective. This would allow venues to move to lower deprivation areas and away from residential areas/sensitive sites. We should not have to wait for a fire or natural disaster to move a venue to a more desirable location.</li> <li>The current discretionary open policy should be retained. This allows applications for new venues to be considered on a case-by-case basis having regard to the criteria set out in the policy and after public notification and a public hearing.</li> </ul> <p>ADOPTING A RELOCATION POLICY</p> <ul style="list-style-type: none"> <li>Good for harm minimisation and district as a whole</li> <li>In 2013 Gambling Act amendment recognised merit enabling venues to relocate</li> <li>Allows venues to move to more suitable areas and out of undesirable ones e.g. residential and high deprivation areas.</li> <li>Over last seven years almost all Councils have adopted some form of relocation in their reviews – approx.. 55 council currently have a relocation policy.</li> <li>Allows venues to move to new, modern refurbished premises, allows upgrade of premises to more modern attractive offering to help revitalisation.</li> <li>Example Te Rapa Tavern, Hamilton p. 2</li> <li>Allows relocation due to fixed lease, public works acquisition, landlords demanding higher than normal rent, re-establish after natural disaster/fire, move out of earthquake prone buildings, move out of premises with large carparks to allow better use as high density residential.</li> <li>Suggested wording provided para. 15 p. 2 – allowing relocation and old venue needing to apply for new licence if desired.</li> <li>Not limited to extenuating circumstances – e.g. away from residential area, better building and location attracting affluent clientele</li> </ul> <p>GAMING MACHINE FUNDING</p> <ul style="list-style-type: none"> <li>In 2022, approximately \$328m of grant funding was approved across 22,053 grants to 9,783 different organisations.<sup>1</sup> In addition, over</li> </ul>

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		<p>\$50m was applied by various RSAs and Workingmen's Clubs to support their own activities. In 2022, 51% were sports-related, with community (20%) next. This funding is crucial.</p> <ul style="list-style-type: none"> <li>• In 2022, grants totalling \$841,908.00 were made directly to Buller District based organisations.</li> <li>• 6% of all grants are made to national and regional organisations – e.g. St. John got funds for new Westport Ambulance</li> <li>• In the year ended 31 December 2022, Club Buller made a profit of \$53,051.00 from gaming machines and used for the Club's non-bar-related operational costs.</li> </ul> <p><b>GAMBLING IS ENJOYABLE ACTIVITY</b></p> <ul style="list-style-type: none"> <li>• 7/10 New Zealanders take part in some form of gambling at least once a year, 1/500 NZ adults have a gambling problem (2018 survey)</li> <li>• Purpose for most gamblers is to have fun, experience excitement – same as buying theatre tickets and vacations. Most not expecting to be paid.</li> </ul> <p><b>POSITIVE WELLBEING IMPACT</b></p> <ul style="list-style-type: none"> <li>• gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.74b to \$2.16b per annum (employment, community groups and New Zealanders via revenue to government)</li> </ul> <p><b>REVENUE BREAKDOWN</b></p> <ul style="list-style-type: none"> <li>• Return to players set around 92%.</li> <li>• Money retained distributed as follows (GST incl.): <ul style="list-style-type: none"> <li>Government Duty 20%</li> <li>GST 13.04%</li> <li>Problem Gambling Levy 1.08%</li> <li>DIA Costs 2.9%</li> <li>Gaming Machine Depreciation 6.95%</li> <li>Repairs &amp; Maintenance 2.84%</li> <li>Venue Costs 13.9%</li> <li>Society Costs 1.74%</li> <li>Donations 37.53%</li> </ul> </li> </ul> <p><b>GAMBLING MACHINE KEY FACTS</b></p> <ul style="list-style-type: none"> <li>• In NZ since 1988, numbers declining naturally 2003 – 25,221 machines, 2023 - 14,464 machines</li> <li>• Expenditure declining per person.</li> <li>• NZ has very low problem gambling rate and includes all forms of gambling.</li> <li>• IN Buller, statistics used included brief intervention - not as reliable as those excluding brief interventions, between 0 and 1 new client a year.</li> <li>• All gaming machine societies contribute to Ministry of Health problem gambling fund over \$25m per annum.</li> <li>• Excellent well-funded treatment services exist.</li> </ul> <p><b>SAFEGUARDS</b></p> <ul style="list-style-type: none"> <li>• Venues must be over 18-year focus, players must be over 18, max. stake \$2.50, max. non-jackpot machine prize \$500, jackpot linked machine max. \$1,000.</li> <li>• Play interrupted by message – time, amount spent and won/lost.</li> </ul>
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## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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		<ul style="list-style-type: none"> <li>Other measures including no ATMS in gaming rooms, signage, staff training, one machine at a time, only one cash withdrawal a day.</li> </ul> <p><b>CURRENT POLICY WORKING</b></p> <ul style="list-style-type: none"> <li>Natural decline in venues – amount spent on gaming machines similar to 2025, increase since 2025 only 3% (national increase 30.6%)</li> <li>Number of machines has no direct correlation with problem gambling.</li> <li>Adopting a more restrictive policy is unlikely to reduce problem gambling, but will, overtime, reduce the amount of funding available to community groups based in Buller District.</li> <li>Those addicted will move onto another venue or other avenues.</li> </ul> <p><b>UNINTENDED CONSEQUENCES – INCREASE IN INTERNET AND MOBILE PHONE GAMBLING</b></p> <ul style="list-style-type: none"> <li>Reducing local gaming machine options may lead to migration to offshore internet/mobile based offerings.</li> <li>Illegal to advertise these sites but legal to gamble on them.</li> <li>New Zealanders love gambling online – TAB 2.2% up in 2022 six-month report, fastest growing channels.</li> <li>Migration from physical Lotto stores and SkyCity during COVID lockdowns apparent. MyLotto - 2020 31% total lotto sales increase 2019, SkyCity 2020 to 20221 90% increase in customer registrations and 173% increase in gaming revenue.</li> <li>Off-shore based online gambling available 24 hours, highly accessible, no restrictions on bet sizes, no capacity to observe or assist people in trouble, reaches new groups vulnerable to medium, no guaranteed return to players, easily abused by minors, unregulated.</li> <li>Do not generate any community funding for New Zealand.</li> </ul> <p><b>COUNCIL CONFLICTS OF INTEREST – LEGAL ADVICE (attached)</b></p> <ul style="list-style-type: none"> <li>Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role; and</li> </ul> <p>Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.</p>
23	Manatū Hauora/ Ministry of Health	Ministry does not provide submissions on these matters but provided some additional information and Statistics for the review.
24	PGF (Problem Gambling Foundation) Group	<p><b>Sinking lid policy (with no relocations or club mergers allowed) for both Class 4 gambling and TAB venues.</b></p> <p><b>EXECUTIVE SUMMARY</b></p> <ul style="list-style-type: none"> <li>Buller District Council is one of only six councils with a policy that does not include further measures to minimise gambling harm, such as a district wide cap, per capita cap, or a sinking lid policy.</li> </ul>

## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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	<ul style="list-style-type: none"> <li>strongly recommend Council to adopt a sinking lid policy (Option C). A sinking lid policy is one of the best policies available to reduce gambling losses and harm from gambling.</li> </ul> <p><b>SUBMISSION AND RECOMMENDATIONS</b></p> <ul style="list-style-type: none"> <li>PGF Group is concerned that Buller District Council is only one of six councils with base legislative requirements, allowing for further Class 4 gambling opportunities in the district.</li> <li>PGF Group strongly recommends Council to adopt Option C or a sinking lid policy (with no relocations or club mergers allowed) for both Class 4 gambling and TAB venues.</li> </ul> <p><b>PGF GROUP POSITION ON GAMBLING</b></p> <ul style="list-style-type: none"> <li>not an 'anti-gambling' organisation</li> <li>opposed to the harm caused by gambling and advocate for better protections for those most at risk of experiencing gambling harm.</li> <li>While most New Zealanders gamble without experiencing any apparent harm, a significant minority do experience harm from their gambling, including negative impacts on their own lives and the lives of others.</li> <li>In 2022, over \$1 billion was lost to pokies across Aotearoa New Zealand</li> </ul> <p><b>GAMING MACHINE PROFIT (GMP) STATISTICS</b></p> <ul style="list-style-type: none"> <li>31 March 2023, there were eight Class 4 gambling venues and 72 EGMs in the Buller District</li> <li>Since 2015, Buller has followed the national trend of a general growth in annual GMP. The largest spike was in 2022 with approximately \$2.5 million being lost to EGMs in Buller</li> <li>Gaming Machine Profits (GMP) statistics – Median Income in Buller \$22,900 (@0218) and each machine made around \$35,350 in 2022.</li> </ul> <p><b>CLASS 4 GAMBLING</b></p> <ul style="list-style-type: none"> <li>Characterised as high-risk, high-turnover gambling and is the most harmful form of gambling in NZ (a form of continuous gambling)</li> <li>One study estimates 30% of EGM losses is from problem or moderate risk gamblers.</li> </ul> <p><b>CLIENT INTERVENTION DATA</b></p> <ul style="list-style-type: none"> <li>Low number of people seeking help often used as a positive indicator about the prevalence of gambling harm.</li> <li>However, reports show only 16% of potential clients for gambling support services actually access or present at these services.</li> <li>Estimates that number of people experiencing mild, moderate or severe gambling harm is more than 250,000.</li> <li>Estimates of 30% of EGM losses are from problem and moderate risk gamblers.</li> <li>Almost half of those receiving full intervention support for their own or someone else's gambling in 2021/2022 was related to Class 4 EGMs</li> </ul> <p><b>ONLINE GAMBLING</b></p>
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## CLASS 4 GAMBLING AND TAB VENUE REVIEW

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		<ul style="list-style-type: none"> <li>online gambling is not within the scope of the Council's Class 4 gambling policy review.</li> <li>no evidence that reducing gaming machines could increase online gambling more rapidly due to a sinking lid policy.</li> <li>Rather – COVID-19 lockdowns saw increase in online gambling, but people returned to Class 4 gambling after lockdown.</li> </ul> <p><b>DENSITY OF CLASS 4 GAMBLING VENUES</b></p> <ul style="list-style-type: none"> <li>Class 4 gambling venues more harmful than casinos because of location in communities and design of EGM rooms.</li> <li>In Buller, all eight Class 4 gambling venues (as at 31 March 2023) are located in very-high deprivation areas</li> </ul> <p><b>IMPACT OF GAMBLING HARM TO VULNERABLE PEOPLE GROUPS</b></p> <ul style="list-style-type: none"> <li>Unethical that the majority of Class 4 EGM expenditure is coming from our lowest income households who can least afford it.</li> <li>Survey estimates indicated that Māori were 3.13 times more likely to be moderate-risk or problem gamblers than non-Māori and non-Pacific peoples.</li> </ul> <p><b>EFFICACY OF A SINKING LID</b></p> <ul style="list-style-type: none"> <li>Generally held view that the easier it is to access an addictive product, the more people there are who will consume that product - It follows then that stronger restrictions on the number and location of addictive products, such as EGMs, constitute a public health approach to the prevention and minimisation of gambling harm.</li> <li>Auckland University of Technology's New Zealand Work Research Institute paper:             <ol style="list-style-type: none"> <li>All three forms of policy intervention are effective in reducing Class 4 venues and EGMs, relative to those TLAs with no restrictions beyond those mandated by the Gambling Act.</li> <li>Sinking lids and per capita caps are equally the most effective at reducing machine spending.</li> <li>Those TLAs who adopted restrictions above and beyond those mandated by the Gambling Act experienced less gambling harm than those TLAs who have not.</li> </ol> </li> </ul> <p><b>THE FUNDING SYSTEM</b></p> <ul style="list-style-type: none"> <li>Trusts and Societies are required to return 40% of GMP to the community by the way of grants or applied funding. This has inextricably linked gambling harm with the survival of community groups, sports and services</li> <li>It cannot be guaranteed that the GMP lost in Buller is returned to groups in Buller. For example, of the \$2.5 million lost in Buller in 2022 around \$842,000 was returned to organisations based in Buller (33% of amount lost in 2022)</li> <li>Very strong redistributive effect from more deprived communities to less deprived communities</li> <li>Less deprived communities (decile 1-5) provided 26% of the GMP but receive 88% of the grants. Conversely, more deprived communities (decile 6-10) provide 74% of the GMP but receive only 12% of the grants.</li> </ul> <p><b>PRIORITISING THE PREVENTION OF HARM – DO MORE</b></p> <ul style="list-style-type: none"> <li>Adoption of a more sustainable, ethical, and transparent community funding system.</li> </ul>
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		<ul style="list-style-type: none"> <li>• More powers for councils to remove EGMs from their communities.</li> <li>• The urgent removal of Class 4 EGMs from high deprivation areas 7-10 in New Zealand.</li> </ul> <p>CONCLUSION</p> <ul style="list-style-type: none"> <li>• A sinking lid – with no relocations or venue mergers permitted – is the best public health approach available to councils who wish to prevent and minimise gambling harm in their communities.</li> </ul>
24	Te Whatu Ora	<p><b>Sinking Lid option for:</b></p> <ul style="list-style-type: none"> <li>○ <b>The number of Gaming Machines allowed in the district.</b></li> <li>○ <b>Number of Venues in the district</b></li> <li>○ <b>Venue Location for both Gambling and TAB venues</b></li> <li>○ <b>Number of Gaming Machines allowed per Class 4 Gambling venue.</b></li> <li>○ <b>No consent for relocation of licenses to other venues permitted, or at least only to an area with a deprivation level below NZDep7</b></li> </ul> <p><b>Te Whatu Ora undertake Social Impact Assessment before draft policy</b></p> <p>GENERAL COMMENTS</p> <ul style="list-style-type: none"> <li>• Recommends further minimising harm from gambling by Sinking Lid approach.</li> <li>• The sinking lid approach has been shown to reduce gambling expenditure relative to regions not adopting policies beyond national level restrictions.</li> <li>• health creation and wellbeing (overall quality of life) is influenced by a wide range of factors beyond the health sector - social determinants of health.</li> </ul> <p>GAMBLING HARM</p> <ul style="list-style-type: none"> <li>• In New Zealand identified six main areas of harm - decreased health (both morbidity and mortality), emotional/psychological distress, financial harm, reduced performance at work or education, relationship disruption/conflict/breakdown and criminal activity, including theft from family members, businesses and communities.</li> <li>• causes two and a half times the amount of harm from a chronic condition like diabetes, and three times the amount of harm from drug use disorders.</li> <li>• Affects friends and families. Gamblers underestimate negative effects on others. 2020 – 4.5% survey respondents were experiencing at least one form of household level gambling harm in previous 12 months (estimated 183,000 adults nationally)</li> <li>• Presents other health issues e.g. higher levels alcohol consumption, smoking and other drug use as well as substantial links to mental health problems and psychological wellbeing.</li> <li>• Risks and prevalence of harmful gambling inequitably distributed with Māori and Pacific people most at risk and having highest prevalence of harmful gambling.</li> <li>• Economic costs e.g. retail and hospitality industries lose significant revenue because of gambling spend.</li> </ul> <p>POLICY REVIEW PROCESS</p>

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	<ul style="list-style-type: none"> <li>• Recommends Council, as part of scoping process, undertakes a Social Impact Assessment workshop – Te Mana Ora offers assistance to carry this out (as they did in Grey and Westland District Councils)</li> <li>• Gathers information and makes recommendations to guide review or policy development – engaging range of stakeholders. Process assists to balance economic, environmental and social needs to promote more positive outcomes.</li> <li>• Runs workshop within the district, including Council, iwi and hāpu, health, community agencies, and current TAB and Class 4 license holders: <ul style="list-style-type: none"> <li>○ identify what stakeholders saw happening within their communities with respect to TAB and Class 4 gambling.</li> <li>○ assess the current policy with respect to how well it.</li> <li>○ was meeting the legislative requirement to prevent and minimise gambling-related harm.</li> </ul> </li> </ul> <p>FEEDBACK ON CONSULTATION DOCUMENT</p> <ul style="list-style-type: none"> <li>• Recommends Sinking Lid option for: <ul style="list-style-type: none"> <li>○ The number of Gaming Machines allowed in the district.</li> <li>○ Number of Venues in the district</li> <li>○ Venue Location for both Gambling and TAB venues</li> <li>○ Number of Gaming Machines allowed per Class 4 Gambling venue.</li> </ul> </li> <li>• No consent for relocation of licenses to other venues permitted, or at least only to an area with a deprivation level below NZDep7.</li> <li>• Current policy very limited conditions outside those in legislation</li> <li>• No identification of criteria Council will consider when assessing venue applications e.g. specific exclusion zone around residential areas, ATMs, sensitive sites.</li> <li>• If sinking lid not adopted then <u>clear criteria</u> regarding setbacks and other areas of concern should be included.</li> </ul> <p>VENUE AND MACHINE RATIOS WITH TOTAL NZ</p> <ul style="list-style-type: none"> <li>• Buller District has a very high number of Class 4 venues and gaming machines per capita when compared with the rest of New Zealand.</li> <li>• Class 4 Gaming venues in New Zealand are disproportionately located in areas of economic deprivation, with around 50% located in deprivation deciles of eight to ten. All venues within Buller District are situated in either deprivation decile 9 or 10 – the highest levels of deprivation.</li> <li>• Buller District ratio of current venue and machine population differs significantly to national ratio (Westport 3X, Karamea 3.7X and Reefton 5X the national ratio for machines to head of population)</li> <li>• Policy may allow for even more machines in Reefton and Karamea</li> <li>• Recommend no TAB venues (current situation)</li> </ul> <p>PROCEEDS OF GAMBLING FUNDS</p> <ul style="list-style-type: none"> <li>• approximately \$2.5 million (about \$7000 per day) was lost on Class 4 gambling in the Buller District in 2022; an increase of around \$93 000 compared to 2021.</li> <li>• Statement in policy '<i>many community groups rely on funding from proceeds of Class 4 gambling</i>' Notes that two-third of money in</li> </ul>
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		<p>community grants come from money problem gamblers have spent and lost.</p> <p>distribution of grants paid out by Trusts and Societies to recipients come from New Zealanders who are the most deprived and goes to New Zealanders who are less deprived – magnifying community disadvantage</p>
26	The Lion Foundation	<p><b>Status Quo</b></p> <p><b>Relocation permitted with a suitable clause</b></p> <p>INTRODUCTION</p> <ul style="list-style-type: none"> <li>One of New Zealand’s largest gaming machine societies by venue number, machine number and money returned to the community through grants.</li> </ul> <p>SUMMARY OF SUBMISSION:</p> <ul style="list-style-type: none"> <li>The Lion Foundation supports the retention of the status quo. TLF does not support the adoption of a sinking lid policy.</li> <li>We would advocate for the inclusion of a suitable relocation clause.</li> </ul> <p>ABOUT TLF</p> <ul style="list-style-type: none"> <li>Our focus is on compliance and the reduction of gambling harm- not here to grow or promote gambling. <ul style="list-style-type: none"> <li>Hotel Reefton - Operating 6 EGMs (entitlement of 8 EGMS). Operation and venue manager are members of Local community with community’s interests at heart,</li> </ul> </li> </ul> <p>GAMING MACHINE FUNDING</p> <ul style="list-style-type: none"> <li>TLF aims to return at least 90% of funds back to the community of origin (where the funds were generated), by a Regional Grants Committee (local community members). Broad based – sports, community/arts/culture, health and education. List of grants attached.</li> <li>10% of all funds are allocated to national organisations (list attached)</li> <li>Stringent processes to ensure grant used for purpose allocated.</li> <li>Difficult process for accessing grants – TLF has launched ‘how to information’ webinars.</li> <li>Gambling Act seeks to balance potential harm against benefits of community fundraising via gaming machines. Sinking Lid does not reserve community funding.</li> <li>2021 report found gambling had a net positive wellbeing totalling \$1.74b to \$2.16b per annum.</li> <li>Provides sample comments from Gaming Machine Association of NZ feedback (p.4)</li> </ul> <p>POLICY DISCUSSION – Retention of Status Quo</p> <ul style="list-style-type: none"> <li>Supports and encourages retention of Status Quo – no evidence to support more restrictive policy.</li> <li>No evidence reduction in venues or machines reduces problem gambling.</li> </ul>

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	<ul style="list-style-type: none"> <li>• 2021 report - Harmful gambling remains relatively unchanged (2016-2018)</li> <li>• Problem gambling rate (2015 report) for all forms of gambling was 0.2% of people aged 18 and over.</li> <li>• Statement of Proposal data relies on information including brief interventions however the most reliable source of data suggests that excluding brief interventions the number of people seeking help has been and remains consistently low.</li> <li>• Gambling Harm Needs Assessment 2021: <ul style="list-style-type: none"> <li>• The total number of clients for all interventions was 9,502 (including 2,875 existing clients and 6,627 new clients) – a decrease of 10.4% (-1,100 clients) compared with the previous year.</li> <li>• The total number of clients, excluding brief interventions, was 4,439 (including 2,487 existing clients and 1,952 new clients) – a decrease of 8.6% (-417 clients) compared with the previous year.</li> <li>• Users of the Gambling Helpline decreased by 30%, falling from 4,806 users in 2017 to 3,328 in 2019.</li> <li>• The treatment providers have failed to encourage persons at risk to use their services.</li> </ul> </li> <li>• Research shows gambling is a popular form of entertainment – mostly realise they are paying for a leisure experience, recreational activity with ebbs and flow/wins and losses.</li> <li>• Consider more restrictive policy (sinking lid) is not appropriate given significant measures already in place to minimise harm e.g. age restrictions, stake restrictions, ATMS excluded from gaming rooms (for more see p. 6)</li> </ul> <p>Option b – a capped policy</p> <ul style="list-style-type: none"> <li>• Do recognise the value of a capped policy.</li> <li>• However, no evidence to support assumption local business opportunities could be limited if it becomes uneconomic to operate with fewer machines – as number of venues has not increased since at least 2017 and the number of machines has declined naturally.</li> <li>• If adopted a capped policy would ensure: <ul style="list-style-type: none"> <li>○ Council maintains control overgrowth of gambling as intended by the Act.</li> <li>○ The existing levels of community funding can be maintained.</li> </ul> </li> </ul> <p>RELOCATION CLAUSE</p> <ul style="list-style-type: none"> <li>• Request serious consideration of inclusion of relocation clause – it is a harm minimisation clause that allows venues to relocate from high deprivation areas to more suitable areas.</li> <li>• Appropriate wording provided (p.8)</li> </ul> <p>UNREGULATED ONLINE OFFSHORE GAMBLING</p> <ul style="list-style-type: none"> <li>• Problem gambling associated with online offshore gambling is growing exponentially – advocates of sinking lid are driving gamblers into world of unregulated and potentially harmful gambling.</li> <li>• 2021 report – online gambling for money has increased evidenced by Gambling Harm services, lived experience and gambling industry representatives.</li> </ul>
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		<ul style="list-style-type: none"> <li>Operators do not operate in accordance with the Gambling Act, do not offer harm minimisation features to protect players, do not contribute to NZ communities.</li> <li>Available 24 hours, highly accessible, no restrictions on bet sizes, no capacity to observe or assist people in trouble, reaches new groups vulnerable to medium, no guaranteed return to players, easily abused by minors, unregulated.</li> <li>Recognised issue with Gambling Commission recommendation that it become a leviable sector within problem gambling provisions in Act.</li> </ul> <p><b>HARM MINIMISATION</b></p> <ul style="list-style-type: none"> <li>committed to preventing and minimising harm from gambling, including problem gambling, whilst facilitating a responsible and legal form of recreational gambling.</li> <li>play a considerable part in the prevention and minimisation of harm at the venues – a fence at the top of the cliff approach – venue operators and staff fully trained, online training system developed with input from all walks of life. Reviewing training programme and resource in line with amended Harm Minimisation Regulations.</li> <li>Face to face training focusing on observing, identifying, supporting problem gamblers and ensuring harm minimisation. Gaming rooms only operate with trained staff. Account manager on site weekly to ensure compliance.</li> <li>Offer range of harm minimisation material at each venue.</li> </ul> <p><b>PROBLEM GAMBLING LEVY 2022-23 TO 2024-25</b></p> <ul style="list-style-type: none"> <li>In addition to above inhouse initiatives Class 4 Gambling Industry contributes significant amounts to a problem gambling levy- approx.\$76mil over 3-year period to Ministry of Health to support and treat gambling addiction and increase public awareness.</li> <li>2021 Report outlined how gambling stakeholder groups had not seen evidence of progress towards objectives and goals set in the Strategy to Minimise Gambling Harm 2022-23 2024-2025 given \$76m budget.</li> <li>Commissioner outlined recommendations (p.11)</li> </ul> <p><b>CONCLUSION</b></p> <ul style="list-style-type: none"> <li>It is our submission that the Council's policy needs to optimise the balance between reasonable controls over the incidence of problem gambling against the generation of funds for the community from legitimate gambling.</li> <li>Finally, we are not here to grow gambling; we believe though that pragmatic use of funds generated by this legalised form of entertainment make a hugely positive contribution to community life across New Zealand.</li> </ul>
27	Clubs NZ INC	<p><b>Retain status quo for all provisions</b></p> <p><b>Support relocation of venues</b></p> <p><b>INTRODUCTION</b></p> <ul style="list-style-type: none"> <li>Represent over 300 clubs in NZ – only one currently in Buller District Club Buller (10 electronic gambling machines)</li> </ul>

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		<p><b>SUMMARY</b></p> <ul style="list-style-type: none"> <li>• Have regard to funding generated from club venues and its application and distribution to authorise purposes and benefitting local club members.</li> <li>• Retain status quo for all provisions.</li> <li>• Support relocation of venues</li> </ul> <p><b>CLUB GAMING PROCEEDS</b></p> <ul style="list-style-type: none"> <li>• funds used 100% locally benefitting those using the machines (not noted in proposal).</li> <li>• Contest assertion that clubs retain all gambling proceeds for purposes of the club – must be done in line with the clubs authorised purpose statement.</li> <li>• Year ended 31 December 2022, Club Buller had net proceeds of \$53,051 from the gaming machines located at its clubrooms and applied this money to authorised purposes that allow for the maintenance and upkeep of its clubrooms, security, staff training, and other non-bar-related operational costs.</li> <li>• Clubs exist for betterment of community and fund applied to keep community assets open and operational.</li> </ul> <p><b>UNIQUE PROVISIONS FOR CLUBS?</b></p> <ul style="list-style-type: none"> <li>• Appropriate for clubs to have own provisions and clubs provide a very safe and secure gaming environment.</li> <li>• Only members and guests of members are allowed access.</li> <li>• Staff quickly become of members showing symptoms of problem gambling because members are known to staff, can be approached discreetly and offered support or excluded.</li> <li>• All venues are required to have host responsibility and harm minimisation measures in place including clubs – since 2001 Clubs NZ has delivered ClubCare Harm Minimisation programme. Developed with support of DIA, Te Whatu Ora and clubs. Investment recently in club specific compliance manuals and reviewing training.</li> </ul> <p><b>NUMBER OF MACHINES AND VENUES IN DISTRICT</b></p> <ul style="list-style-type: none"> <li>• Number of machine and Venues – retain status quo, it's a robust process which ensures views of the community are considered.</li> </ul> <p><b>NUMBER OF GAMING MACHINES ALLOWED PER VENUE</b></p> <ul style="list-style-type: none"> <li>• Number of machines per venue – supports status quo, consistent with Gambling Act provisions and works well.</li> </ul> <p><b>RELOCATION</b></p> <ul style="list-style-type: none"> <li>• strongly recommend allowing for relocation and recognises need for venues to relocate without fear of losing machines – Amendment Act 2013 introduced ability for venues to relocate and retain up to 18 machines.</li> <li>• Allows venues to move to more suitable areas, reestablish after natural disaster or fire, out of earthquake buildings, after loss of premises due to public works or lease termination, if landlord demanding above market rental, move to new, modern, refurbished premises.</li> <li>• Helps revitalise business district, encourages tourism and creates local employment.</li> </ul> <p><b>CONCLUSION</b></p>
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		<ul style="list-style-type: none"> <li>Clubs NZ supports need for a balanced policy that reduces risk of harm and flexible enough to ensure return to community is maximised.</li> </ul> <p>Gambling funds are applied to club authorise purposes and they do not 'retain all profits from gambling activities.</p>
28	NZ Community Trust (NZCT)	<p><b>The current open policy with no cap be retained.</b></p> <p><b>Relocation provision be included which cancels the old venue licence requiring that venue to reapply for consent and be limited to 9 machines.</b></p> <p>GAMING MACHINE FUNDING</p> <ul style="list-style-type: none"> <li>NZCT provided to Buller District Council for the direct benefit of the community from July 2020 to June 2023 a total of \$53,358 across 24 worthy grants. NZCT during the same period approved multiregional grants that benefit Buller District of \$8,333 and National Grants that benefit Buller District of \$3,117 - an overall total of \$64,809.</li> <li>New Zealand has a very low problem gambling rate by international standards – at 0.2% of people aged 18 and over (approximately 8000 people nationally).</li> <li>Sinking lid and no-relocation policies destroy the infrastructure that allows community funding.</li> <li>contribute to a problem gambling fund – which provides some \$20 million per year to the Ministry of Health to support and treat gambling addiction.</li> <li>Problem gamblers supported using a range of measures.</li> <li>Sinking lid is a blunt instrument doing little for problem gambling and reduces community funding.</li> <li>Cap on gaming machine numbers and broader relocation policy (allows venues to move out of deprived areas) is much fairer to operators and helps address problem gambling.</li> <li>Removal of gaming venues means gamblers more likely to go online which is unregulated, unmonitored with no harm minimisation. Returns nothing to NZ.</li> </ul> <p>RECOMMENDATION</p> <p>Open Policy</p> <ul style="list-style-type: none"> <li>The current open policy with no cap be retained.</li> </ul> <p>Relocation provision</p> <ul style="list-style-type: none"> <li>A relocation provision be included which cancels the old venue licence requiring that venue to reapply for consent and be limited to 9 machines. Relocation is positive e.g. after a natural disaster or fire, move out of earthquake prone buildings, contribute to revitalisation.</li> </ul> <p>NATIONAL PICTURE – COMMUNITY ORGANISATIONS RELY ON PUB GAMING</p> <ul style="list-style-type: none"> <li>Reduction in funding has had a negative effect on many organisations.</li> <li>It is crucial that this fundraising system is sustainable long term.</li> <li>75% of groups surveyed in 2012 indicated their organisation is moderately or totally reliant on gaming funding to support their core business. 55% said there would be a high to extreme risk to their</li> </ul>

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		<p>organisation and their core business if they did not receive this funding.</p> <p><b>LOCALLY IN BULLER DISTRICT</b></p> <ul style="list-style-type: none"> <li>• Buller beneficiaries outlined (sports organisations) from NZCT grants listed p.4.</li> <li>• anticipating 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.</li> </ul> <p><b>PUB GAMING SECTOR HAS ALREADY EXPERIENCE SIGNIFICANT DECLINE</b></p> <ul style="list-style-type: none"> <li>• June 2003 and December 2022 – gaming venues down 50% and machines down 41.7%</li> </ul> <p><b>COUNCIL POLICIES CONTRIBUTE TO DECLINE</b></p> <ul style="list-style-type: none"> <li>• Decline in machine numbers yet problem gambling rate remained consistently low as percentage of population.</li> </ul> <p><b>ONLINE UNREGULATED GAMBLING IS THE THREAT</b></p> <ul style="list-style-type: none"> <li>• Public has access to growing number of overseas gambling websites – highly accessible for all, can offer inducements to keep betting, no bet size restrictions or guaranteed return to player.</li> <li>• No funds returned to NZ community or government and no harm minimisation.</li> </ul> <p><b>LOCATION OF GAMING MACHINES MORE IMPORTANT THAN NUMBERS</b></p> <ul style="list-style-type: none"> <li>• Location of gaming machines more important than numbers for preventing and minimising harm.</li> <li>• 2013 Government required local authorities to consider adding relocation clauses – allows relocation from high deprivation areas and gives business owners flexibility to avoid being captive to building owners.</li> </ul> <p><b>HELPING REDUCE HARM</b></p> <ul style="list-style-type: none"> <li>• problem gambling is influenced by distance to venue rather than number of venues – helps operators move out of high deprivation areas.</li> </ul> <p><b>SUPPORTING LOCAL HOSPITALITY BUSINESSES</b></p> <ul style="list-style-type: none"> <li>• Relocation clauses help ensure the continual improvement and growth of your local hospitality sector.</li> </ul> <p><b>RESPONDING TO FUTURE DEMAND –</b></p> <ul style="list-style-type: none"> <li>• Urban growth, re-zoning, population changes can be responded to with relocation clause.</li> </ul> <p><b>GAMING MACHINES CAN ONLY BE PLAYED IN A STRICTLY CONTROLLED ENVIRONMENT</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• DIA monitors the class 4 gambling industry.</li> </ul> <p><b>PUB GAMING - VITAL SUPPORT FOR THE COMMUNITY</b></p> <ul style="list-style-type: none"> <li>• NZCT revenue distribution 2021/2022 – 90% returned to players in prize money, 3.1% grant recipients. See above for Buller statistics.</li> <li>• Grants by gaming machine trusts were 10% of total philanthropic funding in 2011 and twice level given by NZ businesses.</li> </ul> <p><b>REASONS TO RETAIN RELOCATION POLICY ON MACHINES AND VENUES:</b></p>
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		<ul style="list-style-type: none"> <li>o Support local hospitality sector.</li> <li>o Community funding</li> <li>o Benefits considerable – 2021 study gambling in NZ had a net positive wellbeing benefit around \$1.7 to \$2.1 billion per annum.</li> <li>o Gaming machine numbers have little effect on problem gambling – A gambling addiction is complex and influenced by many factors.</li> <li>o Gaming machines are a legal and valid entertainment choice - If appropriate measures remain in place to support problem gambling, then funding structure should remain in the community for the good it will bring.</li> <li>o Problem gambling rates have plateaued - 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 (2016)</li> <li>o Problem gambling rates in NZ are relatively low (NZ 0.1% to 0.2%/UK 0.7%/USA 2.6%)</li> </ul> <p><b>STRICT HARM MINIMISATION OBLIGATIONS UNDER THE GAMBLING ACT</b></p> <ul style="list-style-type: none"> <li>• E.g. staff training, harm minimisation policies, stake and prize money limited, no ATMs on site, play interruption messages every 30 minutes (with information on time and money spent, net wins and losses)</li> </ul> <p><b>ONGOING OBLIGATIONS</b></p> <ul style="list-style-type: none"> <li>• venue staff must provide ongoing help to potential or current problem gamblers.</li> </ul> <p><b>TRAINING</b></p> <ul style="list-style-type: none"> <li>• NZCT provides face-to-face and online courses (500 staff a year)</li> </ul> <p><b>HARM MINIMISATION ACTIVITIES</b></p> <ul style="list-style-type: none"> <li>• resource toolkits</li> <li>• Facial recognition technology increasingly being used to identify problem gamblers.</li> </ul> <p><b>NZCT</b></p> <ul style="list-style-type: none"> <li>• one of the largest gaming trusts with 13% market share, operating in venues and communities</li> <li>• 12 months to 30 September 2022, NZCT approved \$39.2 million in grant funding to sporting, local government, education, the arts, health, and community groups nationwide.</li> <li>• contributes through the problem gambling levy approximately \$1 million per annum to the collective annual levy of \$18-20 million. estimated \$800,000 spent within the organisation each year, on training, resourcing, and technology directed to identifying and mitigating problem gambling in our venues</li> </ul>
29	Oasis – Salvation Army	<p><b>Support Sinking Lid policy</b></p> <p><b>No relocations of venues</b></p> <p><b>BACKGROUND</b></p> <ul style="list-style-type: none"> <li>• History of Salvation Army - provides a wide range of social, community and faith-based services,</li> </ul>



## CLASS 4 GAMBLING AND TAB VENUE REVIEW

Council 13 November 2024

		<ul style="list-style-type: none"> <li>Salvation Army Oasis established in June 1997, in response to growing evidence that the influx of gambling opportunities was having a negative social impact on society. The numbers of clients seeking help for gambling-related harm have increased dramatically. The Salvation Army Oasis gambling harm services have expanded to seven regions with satellite clinics across the country.</li> </ul> <p><b>GAMBLING HARM</b></p> <ul style="list-style-type: none"> <li>Range of potential harms span multiple domains of individual and community wellbeing. Likely that between three and eight percent of adult New Zealanders are currently placed at risk by their gambling - equates to 300 to 800 Buller citizens, further 8% could be harmed by another person's gambling.</li> <li>Class 4 gaming machines still the most accessible mode of gambling in NZ -one of the best-supported strategies is to limit access to gaming machines to minimise and prevent gambling harm.</li> <li>Problematic gambling prevalence rates are higher among those who participate in continuous gambling forms like pokie machines – up to 30% experience harm.</li> <li>Gambling addiction sees lower end of socioeconomic spectrum suffer most. As Māori are overrepresented in this group it is a breach of Te Tiriti o Waitangi principles</li> <li>Gambling increases disparity between richest and poorest member of population</li> <li>Class 4 community funding model is unsustainable in long term – those helping rely on funding from those they are trying to support.</li> <li>Buller District loses two thirds (\$1.73m) of gambling loss (only one third returned to Buller in grants)</li> <li>Buller has a rising Māori population which is at higher risk of harm than non-Māori.</li> </ul> <p><b>SUBMISSION:</b></p> <ul style="list-style-type: none"> <li>Commend Buller council considering sinking lid policy, Support this option.</li> <li>Recommend no relocations policy – supports a true sinking lid policy.</li> </ul> <p>Sinking lid for TABS too</p>

#1

COMPLETE

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**Last Modified:** Monday, August 14, 2023 2:17:26 PM  
**Time Spent:** 00:07:19  
**IP Address:** 222.152.48.149

Page 1

Q1

CONTACT DETAILS

Name	Jason Sellaiah
Postal address	[REDACTED]
City/Town	[REDACTED]
Post code	[REDACTED]
Email address	[REDACTED]
Phone number	[REDACTED]

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

No

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
would you prefer? Please tick your preferred option  
below.

Q5

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.

Number of venues in the district - Page 8, Statement of  
ProposalWhich of the options would you prefer? Please  
tick your preferred option below.

Q6

Sinking lid - No further venues regardless of location.

Venue location both gambling venues and TAB - Page  
9, Statement of ProposalWhich of the options would you  
prefer? Please tick your preferred option below.

**Q7**

**Sinking lid - No new gaming machines permitted.**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

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**Q8**

**Relocation allowed - This option would allow any current Class 4 Venues to relocate, as long as the new venue was within a location permitted under the policy.**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

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#2

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Last Modified: Monday, August 14, 2023 2:27:18 PM  
Time Spent: 00:03:50  
IP Address: 219.89.115.201

Page 1

Q1

CONTACT DETAILS

Name Melissa Salter  
Postal address  
City/Town  
Post code  
Email address



Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

No

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal. Which of the options  
would you prefer? Please tick your preferred option  
below.

Set a cap - limit the number of gaming machines  
across the district. Some councils have policies  
which limit the number of machines in their areas.  
This is usually based on the size of the adult  
population and a ratio. The ratio can be the national  
average (36 machines per 10,000 adult population) or  
another figure. Some limits are set at the total of  
machines at the time the policy was introduced, in  
this case 72.

Q5

Number of venues in the district - Page 8, Statement of  
Proposal. Which of the options would you prefer? Please  
tick your preferred option below.

Set a cap - The cap could be the current number (8) or  
the national average of 2.6 venues per 10,000 adult  
population (currently Buller has an average of 10  
venues per 10,000 adult population).

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

Set a cap - This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also include a 50m 'buffer zone' around established sensitive uses (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae).

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

Set a cap - limit the number of gaming machines per venue. Some councils have policies which specifically limit the number of machines per venue. Some limit the number of machines to a lesser number (e.g. 4) than that allowed under the Act for a specific period, such as 6 months to give Council an opportunity to review the venue operation prior to the allowing the maximum number of 9.

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

Relocation only allowed in certain circumstances - Relocation would be treated as an application for a new venue under certain circumstances: The current venue must be relocated due to extenuating circumstances such as (but not limited to) fire or natural disaster. The current venue is located outside of a permitted area for new venues, and is proposing to relocate into a permitted area.

#3

COMPLETE

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Page 1

Q1

CONTACT DETAILS

Name	Amarni Noble
Company/Organisation (if applicable)	
Postal address	
City/Town	
Post code	
Email address	
Phone number	

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
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below.

Q5

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.

Number of venues in the district - Page 8, Statement of  
ProposalWhich of the options would you prefer? Please  
tick your preferred option below.

**Q6****Sinking lid - No further venues regardless of location.**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

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**Q7****Sinking lid - No new gaming machines permitted.**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

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**Q8****Sinking lid - No venues permitted to relocated.**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

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#4

COMPLETE

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**Time Spent:** 00:03:07  
**IP Address:** 203.118.130.176

Page 1

Q1

CONTACT DETAILS

Name	Tessa Spillane
Company/Organisation (if applicable)	
Postal address	
City/Town	
Post code	
Email address	
Phone number	

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

No

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal. Which of the options  
would you prefer? Please tick your preferred option  
below.

Sinking lid -No new gaming machines permitted.,

Further comment: :

Decrease the number we have in the region! We don't  
need 72! I suggest cap 2 per venue.

Q5

Number of venues in the district - Page 8, Statement of  
Proposal. Which of the options would you prefer? Please  
tick your preferred option below.

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also include a 50m 'buffer zone' around established sensitive uses (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae).**

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - limit the number of gaming machines per venue. Some councils have policies which specifically limit the number of machines per venue. Some limit the number of machines to a lesser number (e.g. 4) than that allowed under the Act for a specific period, such as 6 months to give Council an opportunity to review the venue operation prior to the allowing the maximum number of 9.**

,  
Further comment: :

No more than 2 per venue.

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Sinking lid - No venues permitted to relocated.**

#5

COMPLETE

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**Last Modified:** Monday, August 14, 2023 4:26:37 PM  
**Time Spent:** 00:03:11  
**IP Address:** 203.118.130.176

Page 1

Q1

CONTACT DETAILS

Name	Toroa
Company/Organisation (if applicable)	Youth voice kawatiri
Postal address	[REDACTED]
City/Town	[REDACTED]
Post code	[REDACTED]
Email address	[REDACTED]
Phone number	[REDACTED]

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
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below.

Q5

Sinking lid - Prevent new gaming machine venues  
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Number of venues in the district - Page 8, Statement of  
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tick your preferred option below.

**Q6****Sinking lid - No further venues regardless of location.**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

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**Q7****Sinking lid - No new gaming machines permitted.**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

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**Q8****Sinking lid - No venues permitted to relocated.**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

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#6

COMPLETE

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**Last Modified:** Monday, August 14, 2023 4:27:40 PM  
**Time Spent:** 00:04:05  
**IP Address:** 203.118.130.176

Page 1

Q1

CONTACT DETAILS

Name	Ella Skilton
Company/Organisation (if applicable)	Youth voice kawatiri
Postal address	
City/Town	
Post code	
Email address	
Phone number	

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS BE WITHHELD WHEN SUBMISSIONS ARE MADE AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district – Page 6, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

Set a cap - limit the number of gaming machines across the district. Some councils have policies which limit the number of machines in their areas. This is usually based on the size of the adult population and a ratio. The ratio can be the national average (36 machines per 10,000 adult population) or another figure. Some limits are set at the total of machines at the time the policy was introduced, in this case 72.

Q5

Number of venues in the district - Page 8, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

Set a cap - The cap could be the current number (8) or the national average of 2.6 venues per 10,000 adult population (currently Buller has an average of 10 venues per 10,000 adult population).

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also include a 50m 'buffer zone' around established sensitive uses (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae).**

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - limit the number of gaming machines per venue. Some councils have policies which specifically limit the number of machines per venue. Some limit the number of machines to a lesser number (e.g. 4) than that allowed under the Act for a specific period, such as 6 months to give Council an opportunity to review the venue operation prior to the allowing the maximum number of 9.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Relocation allowed - This option would allow any current Class 4 Venues to relocate, as long as the new venue was within a location permitted under the policy.**

#7

COMPLETE

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**Last Modified:** Monday, August 14, 2023 4:27:46 PM  
**Time Spent:** 00:04:31  
**IP Address:** 203.118.130.176

Page 1

Q1

CONTACT DETAILS

Name	Alexis
Company/Organisation (if applicable)	Youth voice kawatiri
Postal address	[REDACTED]
City/Town	[REDACTED]
Post code	[REDACTED]
Email address	[REDACTED]
Phone number	[REDACTED]

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS BE WITHHELD WHEN SUBMISSIONS ARE MADE AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district – Page 6, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

Set a cap - limit the number of gaming machines across the district. Some councils have policies which limit the number of machines in their areas. This is usually based on the size of the adult population and a ratio. The ratio can be the national average (36 machines per 10,000 adult population) or another figure. Some limits are set at the total of machines at the time the policy was introduced, in this case 72.

Q5

Number of venues in the district - Page 8, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

Set a cap - The cap could be the current number (8) or the national average of 2.6 venues per 10,000 adult population (currently Buller has an average of 10 venues per 10,000 adult population).

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also include a 50m 'buffer zone' around established sensitive uses (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae).**

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - limit the number of gaming machines per venue. Some councils have policies which specifically limit the number of machines per venue. Some limit the number of machines to a lesser number (e.g. 4) than that allowed under the Act for a specific period, such as 6 months to give Council an opportunity to review the venue operation prior to the allowing the maximum number of 9.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

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#8

COMPLETE

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**Last Modified:** Monday, August 14, 2023 4:27:46 PM  
**Time Spent:** 00:04:32  
**IP Address:** 118.149.84.166

Page 1

Q1

## CONTACT DETAILS

Name	Georgia
Company/Organisation (if applicable)	Youth voice kawatiri
Postal address	
City/Town	
Post code	
Email address	
Phone number	

Q2

I do not wish to speak to my submission

## PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
would you prefer? Please tick your preferred option  
below.

Q5

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.

Number of venues in the district - Page 8, Statement of  
ProposalWhich of the options would you prefer? Please  
tick your preferred option below.

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

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**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Sinking lid - No new gaming machines permitted.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Relocation only allowed in certain circumstances - Relocation would be treated as an application for a new venue under certain circumstances: The current venue must be relocated due to extenuating circumstances such as (but not limited to) fire or natural disaster. The current venue is located outside of a permitted area for new venues, and is proposing to relocate into a permitted area.**

#9

COMPLETE

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Last Modified: Monday, August 14, 2023 4:27:48 PM  
Time Spent: 00:02:40  
IP Address: 203.118.130.176

Page 1

Q1

CONTACT DETAILS

Name	Lyra
Company/Organisation (if applicable)	Youth voice
Postal address	[REDACTED]
City/Town	[REDACTED]
Post code	[REDACTED]
Email address	[REDACTED]
Phone number	[REDACTED]

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
would you prefer? Please tick your preferred option  
below.

Q5

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.

Number of venues in the district - Page 8, Statement of  
ProposalWhich of the options would you prefer? Please  
tick your preferred option below.

**Q6****Sinking lid - No further venues regardless of location.**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

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**Q7****Sinking lid - No new gaming machines permitted.**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

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**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

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#10

COMPLETE

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**Last Modified:** Monday, August 14, 2023 4:28:06 PM  
**Time Spent:** 00:03:25  
**IP Address:** 122.56.207.47

Page 1

Q1

CONTACT DETAILS

Name	Leviticus
Company/Organisation (if applicable)	Youth voice
Postal address	
City/Town	
Post code	
Email address	
Phone number	

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal. Which of the options  
would you prefer? Please tick your preferred option  
below.

Status quo -Currently there is no limit on the number  
of venues in the district. Applications are received and  
considered on their merits and are evaluated on the  
matters set out in the Policy in Key Issue three.

,  
Further comment: :  
I work at a venue

Q5

Status quo - No limit (see key Issue one).

Number of venues in the district - Page 8, Statement of  
Proposal Which of the options would you prefer? Please  
tick your preferred option below.

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Status quo - No detailed restrictions stated (Key Issue 3) but includes general references to sensitive sites such as schools.**

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Status quo - Maximum number Licenced after 17 October 2001 – 9 and for Licenced before 17 October 2001 - 18.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Relocation allowed - This option would allow any current Class 4 Venues to relocate, as long as the new venue was within a location permitted under the policy.**

#11

COMPLETE

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**Last Modified:** Monday, August 14, 2023 4:28:24 PM  
**Time Spent:** 00:04:33  
**IP Address:** 122.56.210.168

Page 1

Q1

## CONTACT DETAILS

Name	Keana Anderson
Company/Organisation (if applicable)	Youth voice
Postal address	[REDACTED]
City/Town	[REDACTED]
Post code	[REDACTED]
Email address	[REDACTED]
Phone number	[REDACTED]

Q2

I do not wish to speak to my submission

## PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
would you prefer? Please tick your preferred option  
below.

Q5

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.

Number of venues in the district - Page 8, Statement of  
ProposalWhich of the options would you prefer? Please  
tick your preferred option below.

**Q6****Sinking lid - No further venues regardless of location.**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

---

**Q7****Sinking lid - No new gaming machines permitted.**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

---

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Relocation only allowed in certain circumstances - Relocation would be treated as an application for a new venue under certain circumstances: The current venue must be relocated due to extenuating circumstances such as (but not limited to) fire or natural disaster. The current venue is located outside of a permitted area for new venues, and is proposing to relocate into a permitted area.**

---



#12

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 14, 2023 4:23:16 PM  
**Last Modified:** Monday, August 14, 2023 4:28:32 PM  
**Time Spent:** 00:05:15  
**IP Address:** 203.118.130.176

Page 1

Q1

## CONTACT DETAILS

Name	Eden knox
Company/Organisation (if applicable)	Youth Voice Kawatiri
Postal address	[REDACTED]
City/Town	[REDACTED]
Post code	[REDACTED]
[REDACTED]	[REDACTED]
Phone number	[REDACTED]

Q2

I do not wish to speak to my submission

## PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
would you prefer? Please tick your preferred option  
below.

Q5

Set a cap - The cap could be the current number (8) or  
the national average of 2.6 venues per 10,000 adult  
population (currently Buller has an average of 10  
venues per 10,000 adult population).

Number of venues in the district - Page 8, Statement of  
ProposalWhich of the options would you prefer? Please  
tick your preferred option below.

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also areas with include a 50m 'buffer zone' around established sensitive uses buffer zones (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae).**

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - limit the number of gaming machines per venue. Some councils have policies which specifically limit the number of machines per venue. Some limit the number of machines to a lesser number (e.g. 4) than that allowed under the Act for a specific period, such as 6 months to give Council an opportunity to review the venue operation prior to the allowing the maximum number of 9.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Sinking lid - No venues permitted to relocated.**

#13

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 14, 2023 4:24:05 PM  
**Last Modified:** Monday, August 14, 2023 4:29:43 PM  
**Time Spent:** 00:05:37  
**IP Address:** 115.189.99.171

Page 1

Q1

CONTACT DETAILS

Name	Riley
Postal address	
City/Town	
Post code	
Email address	
Phone number	

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Sinking lid -No new gaming machines permitted.

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal.Which of the options  
would you prefer? Please tick your preferred option  
below.

Q5

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.

Number of venues in the district - Page 8, Statement of  
ProposalWhich of the options would you prefer? Please  
tick your preferred option below.

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Set a cap - This would limit the establishment of new venues to commercial areas where pubs and clubs are usually located. It would also areas with include a 50m 'buffer zone' around established sensitive uses buffer zones (kindergartens, early childhood centres, schools, places of worship, and other community facilities such as marae).**

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Sinking lid - No new gaming machines permitted.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Relocation only allowed in certain circumstances - Relocation would be treated as an application for a new venue under certain circumstances: The current venue must be relocated due to extenuating circumstances such as (but not limited to) fire or natural disaster. The current venue is located outside of a permitted area for new venues, and is proposing to relocate into a permitted area.**

#14

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 14, 2023 8:58:15 PM  
**Last Modified:** Monday, August 14, 2023 9:03:39 PM  
**Time Spent:** 00:05:24  
**IP Address:** 115.189.100.219

Page 1

Q1

## CONTACT DETAILS

Name	Ivan Krantz
Postal address	[REDACTED]
City/Town	[REDACTED]
Post code	[REDACTED]
Email address	[REDACTED]
Phone number	[REDACTED]

Q2

I do not wish to speak to my submission

## PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS BE WITHHELD WHEN SUBMISSIONS ARE MADE AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district – Page 6, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Sinking lid -No new gaming machines permitted.,**

Further comment: :

I have seen first hand the damage that poker machines do and would like to see them banned.

Q5

Number of venues in the district - Page 8, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Sinking lid - Prevent new gaming machine venues from opening and no venue replaced.**

,  
Further comment: :

I have seen first hand the damage that poker machines do and would like to see them banned.

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Sinking lid - No further venues regardless of location.,**

Further comment: :

I have not seen the same level of addiction to TAB gambling as for poker machines.

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Sinking lid - No new gaming machines permitted.,**

Further comment: :

I have seen first hand the damage that poker machines do and would like to see them banned.

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Sinking lid - No venues permitted to relocated.,**

Further comment: :

I have seen first hand the damage that poker machines do and would like to see them banned.

#15

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, August 14, 2023 9:17:31 PM  
**Last Modified:** Monday, August 14, 2023 9:21:13 PM  
**Time Spent:** 00:03:41  
**IP Address:** 206.0.75.51

Page 1

Q1

CONTACT DETAILS

Name	Brooke
Postal address	
City/Town	
Post code	
Email address	

Q2

I do not wish to speak to my submission

PRESENTING YOUR SUBMISSION IN PERSON

Q3

Yes

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal. Which of the options  
would you prefer? Please tick your preferred option  
below.

Status quo -Currently there is no limit on the number  
of venues in the district. Applications are received and  
considered on their merits and are evaluated on the  
matters set out in the Policy in Key Issue three.

Q5

Number of venues in the district - Page 8, Statement of  
Proposal. Which of the options would you prefer? Please  
tick your preferred option below.

Set a cap - The cap could be the current number (8) or  
the national average of 2.6 venues per 10,000 adult  
population (currently Buller has an average of 10  
venues per 10,000 adult population).

,  
Further comment: :  
Cap at current number

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Status quo - No detailed restrictions stated (Key Issue 3) but includes general references to sensitive sites such as schools.**

,  
Further comment: :

We are too small to make these restrictions

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Status quo - Maximum number Licenced after 17 October 2001 – 9 and for Licenced before 17 October 2001 - 18.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Relocation allowed - This option would allow any current Class 4 Venues to relocate, as long as the new venue was within a location permitted under the policy.**



#16

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, August 17, 2023 8:51:33 AM  
**Last Modified:** Thursday, August 17, 2023 8:54:10 AM  
**Time Spent:** 00:02:37  
**IP Address:** 103.23.18.4

Page 1

Q1

## CONTACT DETAILS

Name	Don Martin
Company/Organisation (if applicable)	
Postal address	
City/Town	
Post code	
Phone number	

Q2

I do not wish to speak to my submission

## PRESENTING YOUR SUBMISSION IN PERSON

Q3

No

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal. Which of the options  
would you prefer? Please tick your preferred option  
below.

Status quo -Currently there is no limit on the number  
of venues in the district. Applications are received and  
considered on their merits and are evaluated on the  
matters set out in the Policy in Key Issue three.

Q5

Status quo - No limit (see key Issue one).

Number of venues in the district - Page 8, Statement of  
Proposal Which of the options would you prefer? Please  
tick your preferred option below.

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

**Status quo - No detailed restrictions stated (Key Issue 3) but includes general references to sensitive sites such as schools.**

Further comment: :

Venue Relocation A new venue consent will be issued by Council in the following circumstances: • Where the venue is intended to replace an existing venue within the district; • Where the existing venue operator consents to the relocation; and • Where the proposed new location meets all the other requirements in this policy. In accordance with section 97A, 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), when the new venue is established following a consent being granted under this relocation provision, the old venue is treated as if no gaming machine venue licence was ever held for the venue. The old venue will therefore require a Council consent before being relicensed to host gaming machines and will be limited to a maximum of 9 machines if such a consent is granted.

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

**Status quo - Maximum number Licenced after 17 October 2001 – 9 and for Licenced before 17 October 2001 - 18.**

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

**Relocation allowed - This option would allow any current Class 4 Venues to relocate, as long as the new venue was within a location permitted under the policy.**

,

Further comment: :

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

- Where the venue is intended to replace an existing venue within the district;
- Where the existing venue operator consents to the relocation; and
- Where the proposed new location meets all the other requirements in this policy.

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

#17

COMPLETE

Collector: Web Link 1 (Web Link)  
Started: Monday, August 21, 2023 2:12:58 PM  
Last Modified: Monday, August 21, 2023 2:27:45 PM  
Time Spent: 00:14:47  
IP Address: 122.56.211.218

Page 1

Q1

## CONTACT DETAILS

Name	Lisa Gregory
Company/Organisation (if applicable)	
Postal address	
City/Town	
Post code	
Email address	
Phone number	

Q2

I wish to speak to my submission

## PRESENTING YOUR SUBMISSION IN PERSON

Q3

No

WOULD YOU PREFER YOUR CONTACT DETAILS  
BE WITHHELD WHEN SUBMISSIONS ARE MADE  
AVAILABLE ONLINE ?

Q4

Number of gaming machines allowed in the district –  
Page 6, Statement of Proposal. Which of the options  
would you prefer? Please tick your preferred option  
below.

Sinking lid -No new gaming machines permitted.,  
Further comment: :  
TBC

Q5

Number of venues in the district - Page 8, Statement of  
Proposal Which of the options would you prefer? Please  
tick your preferred option below.

Sinking lid - Prevent new gaming machine venues  
from opening and no venue replaced.  
,  
Further comment: :  
TBC

**Q6**

Venue location both gambling venues and TAB - Page 9, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below.

Sinking lid - No further venues regardless of location.,  
Further comment: :  
TBC

**Q7**

Number of Gaming Machines Allowed per Class 4 Gambling venue - Page 10, Statement of Proposal. Which of the options would you prefer? Please tick your preferred option below.

Sinking lid - No new gaming machines permitted.,  
Further comment: :  
TBC

**Q8**

Relocation of existing venues - Page 11, Statement of Proposal Which of the options would you prefer? Please tick your preferred option below. The Council is legislatively required under the Gambling (Gambling Harm Reduction) Amendment Act 2013 to consider whether to include such a clause. The purpose of the clause would be to clearly set out when the Council would grant consent for a Class 4 Venue in cases where the venue is intended to replace an existing Class 4 Venue. The current policy has no reference to relocation of venue.

Relocation only allowed in certain circumstances - Relocation would be treated as an application for a new venue under certain circumstances: The current venue must be relocated due to extenuating circumstances such as (but not limited to) fire or natural disaster. The current venue is located outside of a permitted area for new venues, and is proposing to relocate into a permitted area.

'  
Further comment: :  
TBC





**BULLER**  
DISTRICT COUNCIL  
Te Kaunihera O Kawatiri

# Class 4 Gambling and TAB Venue Policy

## Submission Form



### Your details Please complete all fields

Name: Mr A.L. Newnham

Organisation:

Postal address:

Phone:

Email:

**Privacy Statement:** In accordance with the Local Government Act 2002, all submissions (including your name and contact details) will be made available online as part of the LTP decision-making process. Please refer to [www.bullerdc.govt.nz/privacy](http://www.bullerdc.govt.nz/privacy) or contact Council for a copy of Council's Privacy Statement.

18 AUG 2023

Have  
your  
say!

Presenting your submission in person

- ☐ I wish to speak to my submission  
☒ I do not wish to speak to my submission

Would you prefer your contact details be withheld when submissions are made available online?

- ☒ Yes ☐ No

Submission number: Office use only

18



### What we are consulting on

The Buller District Council, under the Gambling Act 2003 and the Racing Industry Act 2020, must have a Class 4 Venue and Board (TAB) Venue Policy, that needs to be reviewed every three years. There are several different options for managing gambling venues in the future. These are:

- **Status quo** – Keeping the same policy we have now which has some restrictions on the location of venues but no limits on the number of machines or venues.
- **Set a cap/limit** – Put a limit to the total number of gaming machines, the total number of venues, the number of gaming machines per venue, and/or limit gaming venues to certain areas across the district.
- **Sinking lid** – No new gaming machines or venues permitted. When one gambling venue closes or a gambling machine is no longer used it cannot be replaced. Over time this will likely result in a decrease of gambling machines and venues in the district.

Council has identified five key issues that the policy needs to address. Each of these can be managed through one of the above outlined options.

- The number of Gaming Machines allowed in the district
- Number of venues in the district
- Venue location for both Gambling Venues and Board (TAB) venues
- Number of gambling machines per venue (either the 9 permitted under the Act or less)
- Relocation of licenses to other venues either permitted or not.

Details on the options are issues can be found in the Statement of Proposal on Council's website under Class 4 and TAB venue policy review.

Please take the time to have your say and help 'Shape our District' by looking at the information on the review of the Class 4 Gambling and TAB Venue Policy in the Statement of Proposal. Please give us your feedback on page two.



Shaping  
our district

SCAN ME  
to find out  
more about  
the review  
online.





## Your submission

### 1. Number of gaming machines allowed in the district – Page 6, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☐ Status quo ☐ Set a cap ☒ Sinking lid

### 2. Number of venues in the district – Page 8, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☐ Status quo ☐ Set a cap ☒ Sinking lid

### 3. Venue location both gambling venues and TAB – Page 9, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☐ Status quo ☒ Set a cap ☐ Sinking lid

### 4. Number of Gaming Machines Allowed per Class 4 Gambling venue – Page 10, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☐ Status quo ☐ Set a cap ☒ Sinking lid

### 5. Relocation of existing venues – Page 11, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☐ Relocation allowed ☒ Relocation only allowed in certain circumstances ☐ Sinking lid

Have  
your  
say!

## Further feedback

Generally many  
people in communities  
are  
"financially challenged"  
and in some cases  
gambling can lead to  
addiction and  
further financial  
problems

Need more room? You can attach extra pages – just make sure they're A4 and that you include your name and contact information.

**Submissions are accepted during the consultation period from the 24 July to 4:30pm on the 21 August 2023. Late submissions will not be considered.**

## For more information or for sending us your submission

There are a number of ways you can find out more about the review of the Class 4 Gambling and TAB Venue Policy, get a copy of the document, or make a submission:



#### Email

info@bdc.govt.nz with the subject **Gambling Policy** if you have any questions.



#### Online

Visit Council's website  
[www.bullerdc.govt.nz/have-your-say/class-4-gambling-and-tab-venue-policy-review/](http://www.bullerdc.govt.nz/have-your-say/class-4-gambling-and-tab-venue-policy-review/)

Submissions can be completed online by visiting  
[www.surveymonkey.com/r/Class4GamblingReview](http://www.surveymonkey.com/r/Class4GamblingReview)



#### Post

Return or post this completed form to Council's offices in Westport or Reefton. Address: Buller District Council, PO Box 21, Westport 7866.



#### Have a read

Consultation documents and submission forms can be collected from Council's offices and libraries in Westport and Reefton, i-Sites, and resource centres across the district.





**BULLER**  
DISTRICT COUNCIL  
Te Kaunihera O Kawatiri

# Class 4 Gambling and TAB Venue Policy

## Submission Form



### Your details Please complete all fields

Name: REE TOPP

Organisation: REEF-TOP POWERHOUSE CHARITABLE TRUST INC

Postal address:

Phone:

Email:

**Privacy Statement:** In accordance with the Local Government Act 2002, all submissions (including your name and contact details) will be made available online as part of the LTP decision-making process. Please refer to [www.bullerdc.govt.nz/privacy](http://www.bullerdc.govt.nz/privacy) or contact Council for a copy of Council's Privacy Statement.



Presenting your submission in person

☐ I wish to speak to my submission

☒ I do not wish to speak to my submission

Would you prefer your contact details be withheld when submissions are made available online?

☒ Yes ☐ No

Submission number: Office use only

19



### What we are consulting on

The Buller District Council, under the Gambling Act 2003 and the Racing Industry Act 2020, must have a Class 4 Venue and Board (TAB) Venue Policy, that needs to be reviewed every three years. There are several different options for managing gambling venues in the future. These are:

- **Status quo** – Keeping the same policy we have now which has some restrictions on the location of venues but no limits on the number of machines or venues.
- **Set a cap/limit** – Put a limit to the total number of gaming machines, the total number of venues, the number of gaming machines per venue, and/or limit gaming venues to certain areas across the district.
- **Sinking lid** – No new gaming machines or venues permitted. When one gambling venue closes or a gambling machine is no longer used it cannot be replaced. Overtime this will likely result in a decrease of gambling machines and venues in the district.

Council has identified five key issues that the policy needs to address. Each of these can be managed through one of the above outlined options.

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- Relocation of licenses to other venues either permitted or not.

Details on the options are issues can be found in the Statement of Proposal on Council's website under Class 4 and TAB venue policy review.

Please take the time to have your say and help 'Shape our District' by looking at the information on the review of the Class 4 Gambling and TAB Venue Policy in the Statement of Proposal. Please give us your feedback on page two.



*Shaping*  
our district

SCAN ME  
to find out  
more about  
the review  
online.





## ➤ Your submission

### 1. Number of gaming machines allowed in the district – Page 6, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 2. Number of venues in the district – Page 8, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 3. Venue location both gambling venues and TAB – Page 9, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 4. Number of Gaming Machines Allowed per Class 4 Gambling venue – Page 10, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 5. Relocation of existing venues – Page 11, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☐ Relocation allowed    ☒ Relocation only allowed in certain circumstances    ☐ Sinking lid

Have  
your  
say!

## ➤ Further feedback

*As the existing policy is reasonable  
the status quo should be retained.  
The importance of access to grants  
from gaming for many community  
groups enables positive outcomes  
across the district, which would  
otherwise be very difficult to  
achieve.*

Need more room? You can attach extra pages – just make sure they're A4 and that you include your name and contact information.

Submissions are accepted during the consultation period from the 24 July to 4:30pm on the 21 August 2023. Late submissions will not be considered.

## ➤ For more information or for sending us your submission

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**Online**  
Visit Council's website  
[www.bulldc.govt.nz/have-your-say/class-4-gambling-and-tab-venue-policy-review/](http://www.bulldc.govt.nz/have-your-say/class-4-gambling-and-tab-venue-policy-review/)

Submissions can be completed online by visiting  
[www.surveymonkey.com/r/Class4GamblingReview](http://www.surveymonkey.com/r/Class4GamblingReview)



**Post**  
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**BULLER**  
DISTRICT COUNCIL  
Te Kaunihera O Kawatiri

# Class 4 Gambling and TAB Venue Policy

## Submission Form



### Your details Please complete all fields

Name: GREG TOPP

Organisation: REEDON TRADING CLUB

Postal address:

Phone:

Email:

**Privacy Statement:** In accordance with the Local Government Act 2002, all submissions (including your name and contact details) will be made available online as part of the LTP decision-making process. Please refer to [www.bullerdc.govt.nz/privacy](http://www.bullerdc.govt.nz/privacy) or contact Council for a copy of Council's Privacy Statement.



Presenting your submission in person

☐ I wish to speak to my submission

☒ I do not wish to speak to my submission

Would you prefer your contact details be withheld when submissions are made available online?

☒ Yes ☐ No

Submission number: Office use only

20



### What we are consulting on

The Buller District Council, under the Gambling Act 2003 and the Racing Industry Act 2020, must have a Class 4 Venue and Board (TAB) Venue Policy, that needs to be reviewed every three years. There are several different options for managing gambling venues in the future. These are:

- **Status quo** - Keeping the same policy we have now which has some restrictions on the location of venues but no limits on the number of machines or venues.
- **Set a cap/limit** - Put a limit to the total number of gaming machines, the total number of venues, the number of gaming machines per venue, and/or limit gaming venues to certain areas across the district.
- **Sinking lid** - No new gaming machines or venues permitted. When one gambling venue closes or a gambling machine is no longer used it cannot be replaced. Overtime this will likely result in a decrease of gambling machines and venues in the district.

Council has identified five key issues that the policy needs to address. Each of these can be managed through one of the above outlined options.

- The number of Gaming Machines allowed in the district
- Number of venues in the district
- Venue location for both Gambling Venues and Board (TAB) venues
- Number of gambling machines per venue (either the 9 permitted under the Act or less)
- Relocation of licenses to other venues either permitted or not.

Details on the options are issues can be found in the Statement of Proposal on Council's website under Class 4 and TAB venue policy review.

Please take the time to have your say and help 'Shape our District' by looking at the information on the review of the Class 4 Gambling and TAB Venue Policy in the Statement of Proposal. Please give us your feedback on page two.



*Shaping*  
our district

SCAN ME  
to find out  
more about  
the review  
online.





## ➤ Your submission

### 1. Number of gaming machines allowed in the district – Page 6, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 2. Number of venues in the district – Page 8, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 3. Venue location both gambling venues and TAB – Page 9, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 4. Number of Gaming Machines Allowed per Class 4 Gambling venue – Page 10, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☒ Status quo    ☐ Set a cap    ☐ Sinking lid

### 5. Relocation of existing venues – Page 11, Statement of Proposal.

Which of the options would you prefer? Please tick your preferred option below.

☐ Relocation allowed    ☒ Relocation only allowed in certain circumstances    ☐ Sinking lid

Have  
your  
say!

## ➤ Further feedback

For the reason that data indicates that incidence of problem gambling in the district is very low, the status quo would be sensible.

The importance of access to grants from gaming for many community groups, enables positive outcomes across the district, which would otherwise be very difficult to achieve.

Need more room? You can attach extra pages – just make sure they're A4 and that you include your name and contact information.

Submissions are accepted during the consultation period from the 24 July to 4:30pm on the 21 August 2023. Late submissions will not be considered.

## ➤ For more information or for sending us your submission

There are a number of ways you can find out more about the review of the Class 4 Gambling and TAB Venue Policy, get a copy of the document, or make a submission:



**Email**  
info@bdc.govt.nz with the subject **Gambling Policy** if you have any questions.



**Online**  
Visit Council's website  
[www.bullerdc.govt.nz/have-your-say/class-4-gambling-and-tab-venue-policy-review/](http://www.bullerdc.govt.nz/have-your-say/class-4-gambling-and-tab-venue-policy-review/)

Submissions can be completed online by visiting  
[www.surveymonkey.com/r/Class4GamblingReview](http://www.surveymonkey.com/r/Class4GamblingReview)



**Post**  
Return or post this completed form to Council's offices in Westport or Reefton. Address: Buller District Council, PO Box 21, Westport 7866.



**Have a read**  
Consultation documents and submission forms can be collected from Council's offices and libraries in Westport and Reefton, i-Sites, and resource centres across the district.

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## **Hospitality New Zealand**

**TO BULLER DISTRICT COUNCIL**

**SUBMISSION ON**

**CLASS 4 GAMBLING VENUES POLICY REVIEW**

**AUGUST 2023**

**CONTACT DETAILS:** Hospitality New Zealand  
Contact: Zinnia Foster  
Phone: 0800 500 503  
Email: [zinnia@hospitality.org.nz](mailto:zinnia@hospitality.org.nz)  
[www.hospitality.org.nz](http://www.hospitality.org.nz)

**About Hospitality New Zealand:**

1. Hospitality New Zealand ("Hospitality NZ") is a member-led, not-for-profit organisation representing around 3,000 businesses, including cafés, restaurants, bars, nightclubs, commercial accommodation, country hotels and off-licences.
2. Hospitality NZ has a 121-year history of advocating on behalf of the hospitality and tourism sector. We work tirelessly on behalf of our members to promote the industry, partner with government to prevent restrictive legislation, protect commercial interests and to spearhead innovation for a sustainable future.
3. As the trusted body, we seek to unlock the industry's full potential as a significant engine for growth in the New Zealand economy and to ensure that the industry's needs are represented by engaging with the Government and wider industry.
4. Hospitality NZ has recently launched the Accommodation Association NZ. The purpose of the Accommodation Association is to ensure that the accommodation sector is well understood by central, local government and the regulators.
5. This submission relates to the Class 4 Gambling Venue Policy Review.
6. Enquiries relating to this submission should be referred to Zinnia Foster (Regional Manager), at [zinnia@hospitality.org.nz](mailto:zinnia@hospitality.org.nz) or by phoning [REDACTED]

**General Comments:**

7. Hospitality New Zealand welcomes the opportunity to comment on the Class 4 Gaming Venues Policy.

**Recommendations:**

8. We support a relocation provision be included. Relocation from high deprivation areas to more suitable lower deprivation areas should not be reliant on reasons beyond the venue operators control (i.e. flood, fire, public acquisition). Relocation is a harm minimisation tool.
9. We support the current discretionary open policy be retained. This allows applications for new venues to be considered on a case-by-case basis having regard to the criteria set out in the policy and after public notification and a public hearing.

**Conclusion:**

10. We thank the Buller District Council for the opportunity to provide input into the consultation.
11. We would be happy to discuss any parts of this submission in more detail, and to provide any assistance that may be required.

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

### Introduction

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

### Summary

2. The Association asks that:
  - A relocation provision be included. Relocation is a harm minimisation tool. Venues should be able to relocate in any circumstances when the applicant can demonstrate that the new site is more desirable from a harm minimisation perspective. This would allow venues to move to lower deprivation areas and away from residential areas/sensitive sites. **We should not have to wait for a fire or natural disaster to move a venue to a more desirable location.**
  - The current discretionary open policy should be retained. This allows applications for new venues to be considered on a case-by-case basis having regard to the criteria set out in the policy and after public notification and a public hearing.

### Adopting a Relocation Provision

3. Council is asked to include a relocation provision. This would enable an existing venue to relocate and retain its current machine numbers.
4. Enabling venue relocation is good for harm minimisation and good for the district as a whole.
5. 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.
6. Venue relocation is a harm minimisation tool. Venue relocation allows venues to move out of undesirable areas (such as residential areas and high deprivation areas) to more suitable areas, such as town centres.
7. Over the last seven years, almost all 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.
8. A relocation policy also has other benefits. A relocation policy 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.

9. The first venue to relocate under the amendments made to the Gambling Act 2003 was the Te Rapa Tavern in Hamilton. The photos below show the old rundown premises and the new modern premises. The redevelopment cost \$3,000,000.



The old Te Rapa Tavern



The new Te Rapa Tavern

10. 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.
11. 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.
12. Enabling relocation permits venues to re-establish after a natural disaster or fire.
13. Enabling relocation enables venues to move out of earthquake-prone buildings.
14. 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.
15. The following wording is suggested for a 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.

16. Venue relocation should not be limited to cases of extenuating circumstances such as a fire or natural disaster. If a venue wishes to move to a location that has a lower deprivation rating, the policy should permit this.
17. If a venue wishes to move to a location that is further away from a suburban/residential area to a more suitable area, the policy should permit this.
18. If a venue wishes to move to a new, smaller, modern, refurbished premises that will attract a more affluent clientele (who are less at risk of suffering gambling harm), the policy should permit this.
19. There is no good policy reason for taking steps to restrict the above options.
20. **We should not have to wait for a fire or earthquake to move machines from undesirable areas/premises to more desirable areas/premises. We should seize every such opportunity and promptly facilitate it.**

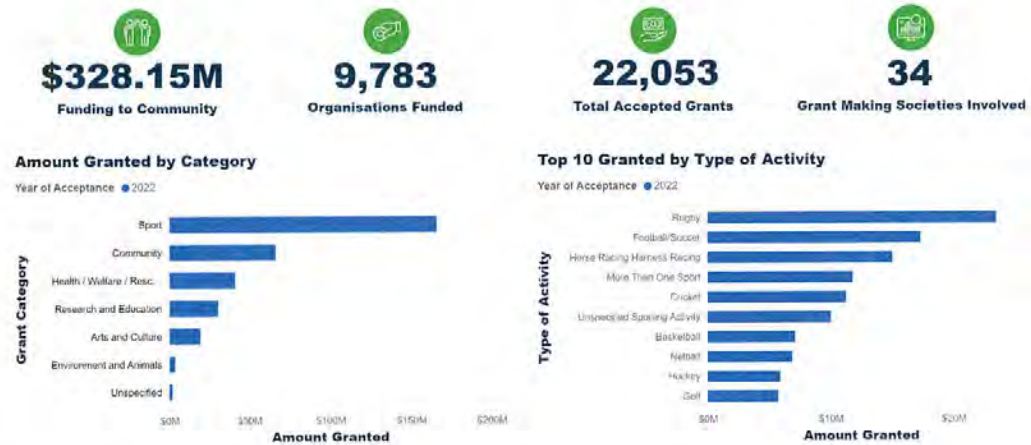
#### Gaming Machine Funding

21. 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.
22. In 2022, approximately \$328m of grant funding was approved across 22,053 grants to 9,783 different organisations.<sup>1</sup> In addition, over \$50m was applied by various RSAs and Workingmen's Clubs to support their own activities. Of the grants distributed in 2022, 51% were sports-related. The second most popular category was community (20%). This funding is crucial.

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<sup>1</sup> <https://granted.govt.nz/dashboard.html>





23. The local benefit from the gaming machine funding includes the following:

- External grants made to local community groups;
- External grants made to national and regional organisations that provide services and support locally; and
- Gaming profits used by local club venues to fund the upkeep of their clubrooms and to provide sporting and recreational facilities to their members.

#### External Grants

24. The amount of grants made to Buller District-based organisations is posted on the [granted.govt.nz](https://granted.govt.nz) website. In 2022, grants totalling \$841,908.00 were made.



### *Grants to National and Regional Organisations*

25. Approximately 6% of all grants are made to national and regional organisations. For example, if St John sought funding for a new ambulance for the Westport station, the funding application would be made by the Auckland-based head office, and the funding allocated to Auckland, despite the grant having a direct benefit to Buller District.

### *Club Authorised Purpose Payments*

26. One of the 8 venues that operate gaming in the Buller District is a club venue, Club Buller, which has 10 gaming machines.
27. The gaming machine proceeds are used by clubs to benefit the very members who play the machines. All the profits remain within the local economy. Clubs are required to publish their accounts on the Incorporated Societies website or the Friendly Societies website. The accounts set out the gross gaming revenue, the gaming profits, and how the profits are allocated.
28. In the year ended 31 December 2022, Club Buller made a profit of \$53,051.00 from its gaming machines. This money was used for the Club's non-bar-related operational costs.

### Gambling is an Enjoyable Activity

29. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2018 Health and Lifestyles Survey<sup>2</sup> 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).



**7 in 10 New Zealand adults take part in some form of gambling at least once a year – 1 in 500 New Zealand adults has a gambling problem.**

30. The majority of people who gamble do so because they find it an enjoyable activity. This is observed by Suits (1979, p. 155)<sup>3</sup>, who states:

Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they

<sup>2</sup> <https://www.hpa.org.nz/research-library/research-publications/2018-health-and-lifestyles-survey-methodology-report>

<sup>3</sup> Suits, D. (1979). The Elasticity of Demand for Gambling. The Quarterly Journal of Economics, 93(1), 155–162. <https://doi.org/10.2307/1882605>

view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.

31. Gambling for the non-addicted gambler may also be an avenue for socialising, stress relief and a way of having fun. Contrary to how it may appear from a non-gambler's perspective, gamblers do not necessarily anticipate they will make money from gambling. Parke (2015)<sup>4</sup> states:

Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.

#### Positive Wellbeing Impact from Gambling in New Zealand

32. The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis<sup>5</sup>, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.74b to \$2.16b per annum.



#### Revenue Breakdown

33. 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 are returned to the player in winnings. The money retained is typically allocated as follows:

<sup>4</sup> Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. <https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf>.

<sup>5</sup> [https://www.gamblinglaw.co.nz/download/Gambling\\_in\\_New\\_Zealand.pdf](https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf)

**Typical Distribution of Gaming Machine Profits**

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	1.08%	1.23%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.53%	43.16%

**Gaming Machines – Key Facts**

34. 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, over 35 years ago.
35. Gaming machine numbers are in natural decline. In 2003, New Zealand had 25,221 gaming machines. In March 2023, New Zealand had 14,464 gaming machines.
36. The proceeds from non-casino gaming machines increased 3.1% from \$895 million in 2018 to \$924 million in 2019. However, after adjusting for both inflation and changes in the adult population, expenditure on non-casino gaming machines is declining (\$242 per person in both 2015/16 and 2016/17 years to \$238 in the 2017/18 year). This coincides with declining numbers of venues and machines.
37. New Zealand has a very low problem gambling rate by international standards. The New Zealand National Gambling Study: Wave 4 (2015)<sup>6</sup> found the problem gambling rate was 0.2% of people aged 18 years and over (approximately 8,000 people nationally). The problem gambling rate is for all forms of gambling, not just gaming machine gambling.
38. The statement of proposal states that the number of interventions has increased from between 3 and 6 each year over the last five years, to 54 in 2020/21. This is based on data that includes brief interventions. A brief intervention is a very short and minor interaction and would include, for example, setting up a stand outside a supermarket and chatting to people about gambling. The most reliable data, and the data used for calculating the problem gambling levy, relates to the number of interventions excluding brief interventions. This number has consistently been low in Buller (between 0 and 1 new clients per year over the last 5 years).

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

39. The presentation data<sup>7</sup> (excluding brief interventions) are as follows:

2017/18	new clients 1	total clients seen 4
2018/19	new clients 0	total clients seen 2
2019/20	new clients 0	total clients seen 0
2020/21	new clients 1	total clients seen 1
2021/22	new clients 1	total clients seen 1

40. All gaming machine societies contribute to a problem gambling fund. This fund provides over \$25 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.
41. 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).

#### Gaming Machine Safeguards

42. The retention of the sinking lid is not necessary given the significant measures that are already in place to minimise the harm from gaming machines.
43. 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.
44. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
45. 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.
46. 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.

<sup>7</sup> <https://www.health.govt.nz/our-work/mental-health-and-addiction/addiction/gambling/service-user-data/intervention-client-data#territorial>

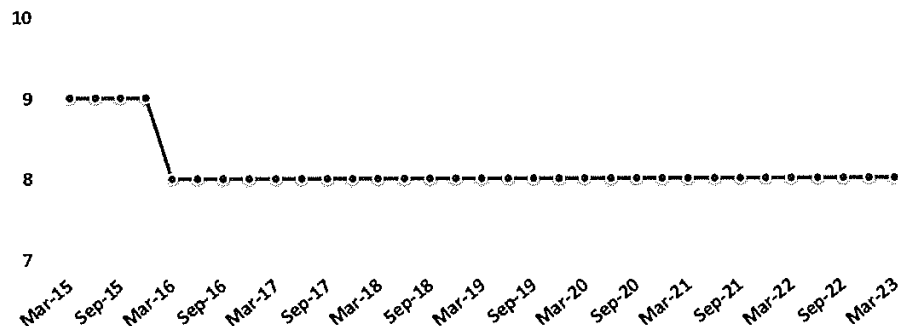
47. Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
48. ATMs are excluded from all gaming rooms.
49. All gaming venues have a harm minimisation policy.
50. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
51. 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.
52. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
53. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
54. It is not permissible for a player to play two gaming machines at once.
55. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
56. 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).
57. It is not permissible to use the word “jackpot” or any similar word in advertising that is visible from outside a venue.
58. From 1 December 2023, ATMs at gaming venues must be in direct line of sight from the main bar area or main customer service area.
59. From 1 December 2023, gamblers will only be permitted to make one cash withdrawal per day. If a second cash withdrawal is made, the venue staff are required to talk to the player about their gambling and complete a two-page report about the person’s gambling. That report must then be reviewed by the venue manager within seven days.
60. From 1 December 2023, gaming machines cannot be visible from outside the venue.
61. From 1 December 2023, venue staff are required to undertake three formal sweeps of the gaming room per hour and keep a detailed record of each sweep.



### The Current Policy is Working

62. A current policy is reasonable, given the current environment of high regulation and naturally reducing machine numbers.
63. Gaming machine venue numbers have already naturally declined despite the lack of any cap or sinking lid.

**Number of venues**



64. The amount spent on gaming machines in Buller has barely increased since 2015. While the national spend since 2015 has increased by 30.6%, the increase in the Buller District is only 3.0%.
65. 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).
66. The 2012 National Gambling Survey<sup>8</sup> 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.

<sup>8</sup> <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-2.docx>



67. The New Zealand National Gambling Study: Wave 3 (2014)<sup>9</sup> 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...

68. 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).

69. Adopting a more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups based in Buller District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines, or worse, may move to another form of gambling such as offshore-based internet and mobile phone gambling.

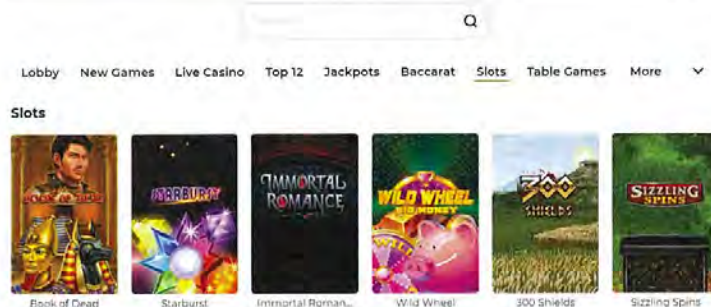
#### Unintended Consequences – Increase in Internet and Mobile Phone Gambling

70. 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.

<sup>9</sup> <https://www.health.govt.nz/publication/new-zealand-national-gambling-study-wave-3-2014>



71. 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.
72. There is no question that New Zealanders love gambling online. TAB New Zealand noted in its 2022 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.
73. SkyCity has a very popular offshore-based online casino with a large selection of gaming machine games.



74. TAB New Zealand estimates that the total online spend with offshore gambling websites by New Zealanders for the 12 months to August 2020 was \$570-\$580m.
75. The migration from physical Lotto stores and SkyCity was apparent during the Covid-19 lockdowns. When the physical venues were closed, the number of online registered players, and the amount of online revenue, skyrocketed.

NZ Lotteries Commission 'MyLotto'			
	FY20	FY19	FY18
Registered Players	1,230,000	845,000	746,000
Increase on previous Year	45.6%	13.3%	17.1%
MyLotto Sales	\$430.6m	\$227.6m	\$201.1m
Increase on previous Year	89.2%	13.2%	25.8%
% of Total Lotto Sales	31%	19%	16%

(Information sourced from annual reports)

Sky City Casino NZ Online Casino			
KPIs	FY21	FY20	Movement
Customer Registrations	48,958	25,661	90.8%
First Time Depositors (new actives)	28,114	15,855	77.3%
Deposit Conversion	57%	62%	n/a
Total Bets	\$792.5m	\$253.5m	212.5%
Gaming Revenue	\$27.9m	\$10.2m	173.5%
Operating Costs & Taxes	\$14.8m	\$5.6m	n/a
Profit	\$13.1m	\$4.5m	190.6%

(Information sourced from annual reports)

76. 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.
77. 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.

#### Council Conflicts of Interest

78. It is important that the committee of councillors that determines the gambling venue policy reflects the full views of the community. It has, however, become common for councillors who are involved in community and sporting groups to withdraw from the gambling venue policy deliberation as they consider the receipt of funding by a group that they are associated with constitutes a conflict. It has also been common for councillors with very strong, pre-determined anti-gambling views to refuse to withdraw from the policy deliberation, despite their strongly held views.
79. The Association has sought independent legal advice (copy attached) from Brookfields Lawyers regarding gambling venue policy conflicts. In summary, the key advice is:
- Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g., a coach who is paid for that service); and
  - Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

Oral Hearing

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

31 July 2023

Jarrod True  
Counsel  
Gaming Machine Association of New Zealand

[REDACTED]  
[REDACTED]

[gmanz.org.nz](http://gmanz.org.nz)

15 March 2021

By Email: chair@gmanz.nz

Gaming Machine Association of New Zealand  
c/o Peter Dengate-Thrush  
Independent Chair

**ATTENTION:** Peter-Dengate Thrush

#### **GAMBLING VENUE POLICY - CONFLICT OF INTEREST**

We refer to your email instructions of 26 February 2021, seeking our advice regarding councillor conflicts of interest with respect to decision-making on Council's gambling venue policy.

#### **YOUR QUESTIONS**

1. You have asked us to advise whether:
  - a. Membership of a club or organisation that receives gaming machine grant funding would constitute a conflict of interest that would require the councillor to withdraw from decision-making or discussion regarding a proposed gambling venue policy; and
  - b. If Council has itself received gambling grant funding, does this impact on its ability to decide on a gambling venue policy, such that the decision should be made by an independent commissioner?

#### **EXECUTIVE SUMMARY**

1. In summary:
  - a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of membership fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances,

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it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed too remote to influence decision-making.

- b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g. a coach who is paid for that service).
  - c. Being a member of a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.
  - d. Where an elected member, outside of a debate on the issue, had expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.
2. The fact that Council may have previously been the recipient of gaming grant money would not create a conflict of interest when deciding its gambling venue policy. Such democratic decision-making is fundamental to its role and is distinguishable from regulatory or quasi-judicial decision-making where appointment of an independent commissioner may be appropriate to avoid any appearance of bias. The decision-making processes in the Local Government Act 2002 (LGA) already impose important requirements to ensure that such decision-making involves consideration of broader community views and not just the interests of Council as an organisation. It would therefore be unnecessary and inappropriate to appoint an independent commissioner because Council initiatives may have previously benefited from gaming grants.

## ANALYSIS

3. Under section 101 of the Gambling Act 2003 (GA), territorial authorities must, using the special consultative procedure in section 83 of the LGA, adopt a policy that specifies whether class 4 venues may be established in the district, and if so, where they may be located (**the policy**). The policy may also specify any restrictions on the maximum number of gaming machines that may be operated at a class 4 venue and may include a relocation policy.

*Does membership of an organisation or club create a conflict of interest for participation in discussion or decision-making on gambling venue policies?*

4. It is not uncommon for councillors to be members of organisations and clubs, some of which may receive grant funding from gaming machines. This raises the question of whether membership of such a club or organisation would constitute a conflict of interest that would prevent the councillor from participating in discussion or decision-making regarding the policy.
5. Broadly speaking, a conflict of interest occurs when an elected member is affected by some other interest that he or she has in their private life. There are different types of conflict of interest:

glt/head



- a. Financial conflicts of interest – where the member (or their spouse or partner) has a direct or indirect financial interest in a particular decision, they cannot discuss or vote on the matter.<sup>1</sup>
- b. Non-financial conflicts of interest.

#### Financial conflicts of interest

6. The applicable legislation is the Local Authorities (Members' Interests) Act 1968 (**LAMIA**). While the LAMIA does not define what a financial interest is, section 6(2) outlines a number of examples where a member will be deemed to have a financial interest:
  - The member, or his or her spouse, owns 10% or more of the issued capital of an incorporated company or any company controlling that company, that has a pecuniary interest (direct or indirect) in a matter before the local authority or committee; or
  - The member, or his or her spouse, is a member of the company and either of them is the managing director or the general manager of the company; or
  - The member, or his or her spouse, is a member of a company controlling the company having a pecuniary interest in the matter before the local authority or committee, and either the member, or his or her spouse, is the managing director or the general manager; or
  - The member, or his or her spouse, is the managing director or general manager of the company, and either of them is a member of a company controlling that company.
7. Other than these examples, the LAMIA does not define what a "financial interest" is. However, the Auditor-General has described a "financial interest" as "a reasonable expectation of financial loss or gain from the particular decision".<sup>2</sup>
8. It is unlikely that membership alone of a community organisation that receives gaming grant funding would give rise to a financial interest. This is because such organisations and clubs are usually run on a not-for-profit basis. One example where a financial interest could potentially arise would be if the member were in a paid position at the club or organisation, and the funding for that position comes from gaming grants. Another example may be where there is a prospect that membership fees or subscriptions to a club could be affected by the amount of gaming grant funding. However, given that gambling venue policies are relatively high-level in nature and do not directly address matters such as the licensing of particular venues (which involve a separate decision-

<sup>1</sup> Section 6(1) of the Local Authorities (Members' Interests) Act 1968.

<sup>2</sup> Controller and Auditor-General, **Local Authorities (Members' Interests) Act 1968: A Guide for members of local authorities on managing financial conflicts of interest**, June 2020, at 4.15, referring to the definition of a financial interest in *Downward v Babington* [1975] VR 872.

making process, often by Council officers acting under delegated authority), or allocation of gaming grants (which are decided by the organisations that operate gaming licences subject to statutory requirements), any such potential impact is likely to be too speculative or remote to constitute a financial interest in the decision-making on a gambling venue policy.

9. Notwithstanding this view, where an elected member may receive a financial benefit of the kind described above from a club or organisation receiving gaming grant funding, they may as a matter of prudence wish to first obtain an exemption from the Auditor-General under section 6(3)(f) of the LAMIA (on the grounds that the financial interest is too remote or insignificant to be regarded as likely to influence him or her in voting or taking part in the discussion of the policy) before participating in discussion or decision-making on the policy. It is a relatively simple process to apply for such an exemption.

#### Non-financial conflicts of interest

10. A non-financial conflict of interest is any situation where a member is not affected financially by a decision but is affected in some other way that may constitute bias or the appearance of bias. Non-financial conflicts of interest are relevant to the avoidance of bias in decision-making. As opposed to financial interests, which can create personal liability for an elected member, bias is a matter of Council's accountability to the public. The avoidance of bias is part of the administrative law principles of natural justice, which require the Council to act fairly in reaching its decisions. The fairness principle has been described in these terms:<sup>3</sup>

In exercising that discretion, as in exercising any other administrative function, they [members] owe a constitutional duty to perform it fairly and honestly ... What is a fair procedure to be adopted at a particular enquiry will depend upon the nature of its subject matter.

11. The test for whether an interest may give rise to an apparent bias has been stated by the Court of Appeal as being where circumstances:<sup>4</sup>

...might lead a fair-minded lay observer to reasonably apprehend that the judge might not bring an impartial mind to the resolution of the instant case.

12. Unlike a financial conflict of interest, a potential non-financial conflict does not automatically exclude a member from participating in a decision. It will depend on how serious the conflict is. The Auditor-General has suggested a number of factors that may be relevant to an assessment of whether a potential conflict is serious enough to exclude a member from participation in decision-making. They include:<sup>5</sup>

- The type or size of the person's other interest;
- The nature or significance of the particular decision or activity being carried out by the public organisation;
- The extent to which the person's other interest could specifically affect, or be affected by, the public organisation's decision or activity; and

<sup>3</sup> *Bushell v Secretary of State for the Environment* [1981] AC 75, 95.

<sup>4</sup> *Muir v Commissioner of Inland Revenue* [2007] 3 NZLR 495.

<sup>5</sup> Controller and Auditor-General, *Managing conflicts of interest: A guide for the public sector*, June 2020, at 4.31.



- The nature or extent of the person's current or intended involvement in the public organisation's decision or activity.

13. In our view, in the context of decision-making on a gambling venue policy, the mere fact that an elected member is also a lay member of an organisation or club that receives gaming grant funding is unlikely to give rise to a conflict of interest. This is because of the level of remoteness from any possible benefit or loss associated with the decision-making. In most cases, the contents of a gambling venue policy will not directly impact on funding that has or may be received by a club or organisation from gaming machine grants. The purpose of the policy is to specify whether class 4 venues may be established, and if so their location. It can also specify restrictions on the number of gaming machines that may operate at a class 4 venue. Such matters do not necessarily impact directly on whether a club or organisation may receive gaming grant funding, and if so, the amount of any such grant. Funding decisions are made by the organisations who operate the gaming machines, not the Council. The fact that a member, by virtue of membership of a club or organisation that has received gaming grants, has knowledge or experience of the beneficial impacts that gaming grants can have on the community does not give rise to a conflict of interest. To the contrary, it may contribute to a fair and balanced consideration of the issues arising when making decisions on a gambling venue policy. This would be consistent with the purpose of the GA, which is *inter alia* to ensure that money from gambling benefits the community and to facilitate community involvement in decisions about the provision of gambling.<sup>6</sup>

14. It is important to distinguish between membership of a club or organisation that receives gaming grants, and membership of a club or organisation that holds a gaming licence. In our view, while the former would not give rise to a conflict of interest in decision-making on a gambling venue policy, there is a much greater likelihood that the latter could give rise to a conflict of interest. This is particularly the case if the elected member holds an executive role in the club or organisation that operates a gaming licence. This is because, while a gambling venue policy does not specify whether or not a particular club or organisation is able to obtain a gaming licence *per se*, the policy may affect the eligibility of a club or organisation to hold a licence. As such, participation in the discussion or decision-making by a member of any such club or organisation could create an appearance of bias and therefore a conflict of interest.

15. Elected members should also always be mindful of avoiding predetermination, i.e., approaching decision-making with a closed mind. Elected members are entitled (and expected) to bring their previous knowledge and experiences to decision-making, but to approach any decision with an open mind. This means that elected members should be cautious about being vocal, other than in the course of Council debates, about particular views in a manner that may suggest that they do not and cannot have an open mind on a particular matter. This is because a conflict of interest may arise as a result of possible predetermination (i.e. actual or perceived bias).

16. In summary:

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<sup>6</sup> Section 3 of the GA.

- a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances, it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed to remote to influence decision-making.
- b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gaming venue policy.
- c. Being a member of a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.
- d. Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

*Would Council be conflicted in deciding a gambling venue policy because it has previously received gaming grants?*

17. Council initiatives will frequently fall within the second category of the definition of an "authorised purpose" for which gaming proceeds may be used, as set out in section 4 of the GA i.e., "a non-commercial purpose that is beneficial to the whole or a section of the community". Notwithstanding the eligibility for Council initiatives to receive gaming grants, Parliament conferred territorial authorities with the responsibility of formulating a gaming venue policy for their districts. We do not consider that any conflict of interest would arise in relation to decision-making on a gambling venue policy because the Council may have previously been awarded gaming grants. This is because:

- a. While individual elected members are subject to the LAMIA which prevents them from participating in decision-making where they have a financial interest, Council as an entity is not subject to the LAMIA.
- b. Caselaw recognises the inevitability of a degree of conflict within councils when exercising certain statutory functions. It is established, for example, that a council may object to its own district plan, prosecute itself, and apply to itself for a resource consent.
- c. The standard of impartiality for a Council is that it must approach its duty of inquiring into submissions with an open mind.<sup>7</sup> Given the requirement to undertake a special consultative process and the diverse views of individual members, it is unlikely that the fact that certain projects


<sup>7</sup> *Lower Hutt City Council v Bank* [1974] 1 NZLR 545 at 550.



undertaken by Council have benefited from gaming grants would unduly influence Council decision-making on its gambling venue policy. For the same reasons outlined above in relation to individual members, the connection between gaming grant money and decision-making on gambling venues is too remote to constitute a conflict of interest. In any event, compliance with the statutory rules in the LGA regarding decision-making by local authorities<sup>8</sup> and the general principles relating to local authorities<sup>9</sup> are intended to ensure that Council decision-making is open, transparent, and has regard to the diversity of community interests, notwithstanding the many facets and activities undertaken by Council.

18. We note that Council is not undertaking a quasi-judicial role when formulating a gambling venue policy. There is greater need to avoid the appearance of bias when it comes to regulatory or quasi-judicial decision making (such as considering a resource consent application). In those circumstances, where there is an apparent conflict in Council's interests, it is common for Council to delegate its decision-making to an independent commissioner. To that end, the Resource Management Act 1991 (RMA) specifically allows for the appointment of independent commissioners to decide consent applications. However, while Council may delegate its decision-making on a gambling venue policy to a particular committee or sub-committee of Council, it would be unnecessary (and in our view, inappropriate) to delegate such decision-making to an independent commissioner.

Yours faithfully  
**BROOKFIELDS**

  
 Linda O'Reilly  
 Partner

<sup>8</sup> Section 76 of the LGA.

<sup>9</sup> Section 14 of the LGA.

(23)

**Prue Holms**

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**From:** Sean-Paul Kearns <Sean-Paul.Kearns@health.govt.nz>  
**Sent:** Thursday, 27 July 2023 12:17 pm  
**To:** Bronwyn Little  
**Subject:** RE: REVIEW: CLASS 4 GAMBLING AND TAB VENUE POLICY, BULLER DISTRICT COUNCIL

Kia ora Bronwyn

Thank you for your correspondence. Manatū Hauora | Ministry of Health does not generally provide submissions on local government reviews, but to assist with your review I've pulled together some additional information and stats that you may find useful. Please let me know if you have any additional questions.

If you're not aware of it already, the Department of Internal Affairs has produced a resource to assist local councils in their policy review process. This was developed in collaboration with Manatū Hauora.

<https://www.dia.govt.nz/Gambling-territorial-authorities-class-4-venue-policies>

Of particular interest to you will be the findings from this report on the effectiveness of local government class 4 policy. It shows that sinking lids and per capita caps were the most effective in reducing venues, machines and spend compared to policies with no restrictions.

<https://www.health.govt.nz/publication/capping-problem-gambling-nz-effectiveness-local-government-policy-interventions>

The Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25 sets out the approach to and budget for funding and coordinating services to prevent and minimise gambling harm during the three year period starting 1 July 2022. It also includes relevant background and context about the gambling environment, the nature of gambling in New Zealand, gambling related harms and the public health approach to gambling harm.

<https://www.health.govt.nz/publication/strategy-prevent-and-minimise-gambling-harm-2022-23-2024-25>

Here's a little bit more information for you on the bigger picture of gambling harm, as not everyone who experiences harm from gambling seeks help.

The Health and Lifestyles Survey (HLS) is a national in-home survey that measures New Zealanders' behaviours, attitudes and knowledge on a range of health and lifestyle topics including food and drink, smoking, vaping, gambling, wellbeing and being out in the sun.

The 2020 HLS included findings on gambling participation and frequency, gambling harm among New Zealand adults among different social and population groups. Where relevant, results are compared with those from earlier surveys. There is also specific data on pokies in pubs and clubs.

In 2020, 2.9% met the PGSI (Problem Gambling Severity Index) criteria for low-risk gambling, 1.6% for moderate-risk and problem gambling combined. These figures represent around 119,000 low-risk gamblers, 65,000 moderate-risk and problem gamblers in New Zealand. These results indicate that in total 4.5% of New Zealand adults (approximately 184,000 people) had experienced at least some level of individual gambling harm in the last 12 months.

Māori, Pacific peoples, and people on lower incomes continue to disproportionately experience gambling harm. This is particularly true of Māori who are approximately 3.13 times more likely to be moderate-risk or problem gamblers than non-Māori and non-Pacific peoples. Pacific peoples were 2.56 times more likely to be moderate-risk or problem gamblers than non-Māori and non-Pacific peoples.

The harm attributed to pokies specifically is especially concerning.



- One in ten (9.6%) adult New Zealanders (16-years and older) had played pokies at a pub or club in the last 12 months.
- About a fifth (20%) of these players were at-risk gamblers (experiencing harm).
- More than half (50.3%) of those who played EGMs in pubs or clubs at least once a month experienced some level of gambling harm

More HLS results for gambling (2006 to 2020) can be found here: <https://kupe.hpa.org.nz/>

Other relevant research can be found on our website:

<https://www.health.govt.nz/our-work/mental-health-and-addiction/addiction/gambling/problem-gambling-publications>

Thank you again for your query. Please let me know if you have any further questions.

Ngā mihi  
Sean-Paul

Sean-Paul Kearns (he/him)  
Senior Advisor  
Mental Health and Addiction Strategy and Policy  
Te Pou Mahi Pūnaha | System Performance  
[REDACTED]  
[sean-paul.kearns@health.govt.nz](mailto:sean-paul.kearns@health.govt.nz)  
Manatū Hauora, 133 Molesworth Street  
Thorndon, Wellington 6011



**From:** Bronwyn Little [REDACTED]  
**Sent:** Tuesday, 25 July 2023 3:30 pm  
**To:** Bronwyn Little [REDACTED]  
**Subject:** REVIEW: CLASS 4 GAMBLING AND TAB VENUE POLICY, BULLER DISTRICT COUNCIL

Dear stakeholder

Buller District Council is undertaking a review of the current Class 4 Gambling and TAB Venue Policy. The matter was considered at the meeting of the Regulatory and Hearings Committee on 17 May 2023. At that meeting it was decided to consult with the public on all the issues and options set out in the Statement of Proposal presented to the meeting.

Consultation on the issues and options is now underway and closes on 21 August 2023. All the information on the consultation can be found on our website at:

<https://bullerdc.govt.nz/have-your-say/class-4-gambling-and-tab-venue-policy-review/>

As an important stakeholder we are hoping your organisation will make a submission during this initial consultation to assist the Council in the preparation of a draft Policy which will be the subject of further consultation. A



submission form is attached to this email along with a Statement of Proposal and a copy of the current Policy (status quo).

Further useful information is located on the website above. There is also an on-line submission form on the website page.

If you wish to provide further information in support of your submission please fill out the submission form with your details and attach the information.

You can then send your feedback to Council by post or email:

Post:

Attention: Gambling Policy Review

Buller District Council

PO Box 21

Westport 7866

Email:

[info@bdc.govt.nz](mailto:info@bdc.govt.nz) (with the subject 'Gambling Policy Submission')

It is anticipated that a hearing will be held for those submitters who wish to present their submissions in person (or by zoom) in October 2023.

Thank you very much for your time.

Kind regards

Bronwyn

Bronwyn Little | Policy Advisor

Buller District Council | Phone 0800 807 239 | [www.bullerdc.govt.nz](http://www.bullerdc.govt.nz)

PO Box 21 | Westport 7866

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**PGF Group Submission  
Buller District Council  
Class 4 Gambling and TAB Venue Policy Review 2023**

Submitted to	Buller District Council Class 4 Gambling and TAB Venue Policy Review via email submission to <a href="mailto:info@bdc.govt.nz">info@bdc.govt.nz</a>
Details of Submitter	Kristy Kang Policy and Public Health Manager, PGF Group 
Physical Address	Level 1, 128 Khyber Pass Road Grafton, Auckland 1023
Date of Submission	21 August 2023

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## EXECUTIVE SUMMARY

PGF Group thanks Buller District Council for the opportunity to comment on the Class 4 gambling and TAB venue policy.

Currently, Buller District Council has base legislative requirements, which means the existing gambling policy has no further restrictions around the establishment and control of the number of pokies as already set out in the Gambling Act 2003. Buller District Council is one of only six councils with a policy that does not include further measures to minimise gambling harm, such as a district wide cap, per capita cap, or a sinking lid policy.

We strongly recommend Council to adopt a sinking lid policy (Option C). A sinking lid policy is one of the best policies available to reduce gambling losses and harm from gambling. Given that 33 out of 65 councils across Aotearoa New Zealand have a sinking lid policy in place, a sinking lid would be a commendable step which reflects Council's efforts to better the health and wellbeing of the community.

Our submission is evidence-based and founded on what is known about gambling harm across Aotearoa New Zealand. 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. Funding communities based on a system that relies on our lowest income households putting money they cannot afford to lose into gaming machines is unethical and inequitable. This disproportionately impacts Māori who generally reside in areas where the majority of these machines are situated.

Our organisation supports the submission made by Te Whatu Ora, and asks Council to consider the feedback they have provided in their decision making.





## SUBMISSION AND RECOMMENDATIONS

1. PGF Group is **concerned** that Buller District Council is only one of six councils with base legislative requirements, allowing for further Class 4 gambling opportunities in the district.
2. PGF Group **strongly recommends** Council to adopt Option C or a sinking lid policy (with no relocations or club mergers allowed) for both Class 4 gambling and TAB venues.

## INTRODUCTION

3. The Problem Gambling Foundation trades as PGF Group (PGF) and works closely with its subsidiary charitable companies, Asian Family Services and Mapu Maia Pasifika Service, united by a shared purpose to provide public health and clinical services that contribute to the wellbeing of whānau and communities.
4. PGF operate under contract to Te Whatu Ora and are funded from the gambling levy to provide clinical intervention and public health services.
5. As part of our public health work, we advocate for the development of public policy that contributes to the prevention and minimisation of gambling related harms.
6. This includes working with Territorial Local Authorities (TLAs) to encourage the adoption of policies that address community concerns regarding the density and locality of gambling venues; in this case, a sinking lid policy.

## PGF GROUP POSITION ON GAMBLING

7. It is important to note that we are not an 'anti-gambling' organisation as some may infer. We are, however, opposed to the harm caused by gambling and advocate for better protections for those most at risk of experiencing gambling harm.
8. We recognise that the majority of New Zealanders are non-problem gamblers.
9. While most New Zealanders gamble without experiencing any apparent harm, a significant minority do experience harm from their gambling, including negative impacts on their own lives and the lives of others.





10. In 2021/22, total expenditure (losses, or the amount remaining after deducting prizes and payouts from turnover) across the four main forms of gambling – Class 4 Electronic Gaming Machines (EGMs), Lotto, casinos and TAB – was more than \$2.25 billion, or \$627 for every adult (1).
11. In 2022, over \$1 billion was lost to pokies across Aotearoa New Zealand (2). This was the highest annual loss since 2003.
12. Most money spent on gambling in New Zealand comes from the relatively limited number of people who play Class 4 EGMs, and most clients accessing gambling support services cite pub/club EGMs as a primary problem gambling mode (3).

## ADVICE FOR COUNCIL DECISION MAKING

### GAMING MACHINE PROFIT (GMP) STATISTICS

13. As at 31 March 2023, there were eight Class 4 gambling venues and 72 EGMs in the Buller District (2).
14. Since 2015, Buller has followed the national trend of a general growth in annual GMP. The largest spike was in 2022 with approximately \$2.5 million being lost to EGMs in Buller (2).
15. According to the 2018 Census, the median income in Buller is \$22,900 (4). In comparison, every machine in Buller made, on average, around \$35,350 in 2022 (2). That means a pokie machine made more than \$12,000 than the average person in the district.
16. We cannot be sure why losses continue to grow while machine numbers are coming down, but what we do know is that EGM numbers are not being reduced fast enough in areas where they need to, particularly high deprivation areas.

### CLASS 4 GAMBLING

17. The harms caused by different forms of gambling are not equal, as evidenced by the different classifications of gambling within the Gambling Act 2003.



18. Class 4 gambling – EGMs in pubs, clubs and TABs – is characterised as high-risk, high-turnover gambling, and is the most harmful form of gambling in New Zealand (3).
19. EGMs are particularly harmful because they are a form of continuous gambling (5). The short turnaround time between placing a bet and finding out whether you have won or lost, coupled with the ability to play multiple games in quick succession makes continuous gambling one of the most addictive forms of gambling available.

#### CLIENT INTERVENTION DATA

20. The Trusts and Societies who hold the licenses for the 14,464 Class 4 EGMs in New Zealand (as at 31 March 2023) (2) often submit that the relatively low number of people who seek help for a gambling problem is a positive indicator about the prevalence of harmful gambling in New Zealand. This assertion is disingenuous and should be disregarded.
21. The Ministry of Health's *Strategy to Prevent and Minimise Gambling Harm* states that "needs assessment and outcomes monitoring reports show that only 16% of potential clients for gambling support services (that is, people whose reported harm results in a moderate to high PGSI<sup>1</sup> score) actually access or present at these services", and that this low service use is also evident for other forms of addiction (3).
22. Furthermore, the Ministry of Health's Continuum of Gambling Behaviour and Harm (Figure 2) estimates the number of people experiencing mild, moderate or severe gambling harm is more than 250,000 – that's more than the population of Wellington (3).

<sup>1</sup> The Problem Gambling Severity Index (PGSI) is commonly used to screen and categorise three levels of harm: severe or high risk (problem gambling), moderate risk and low risk.

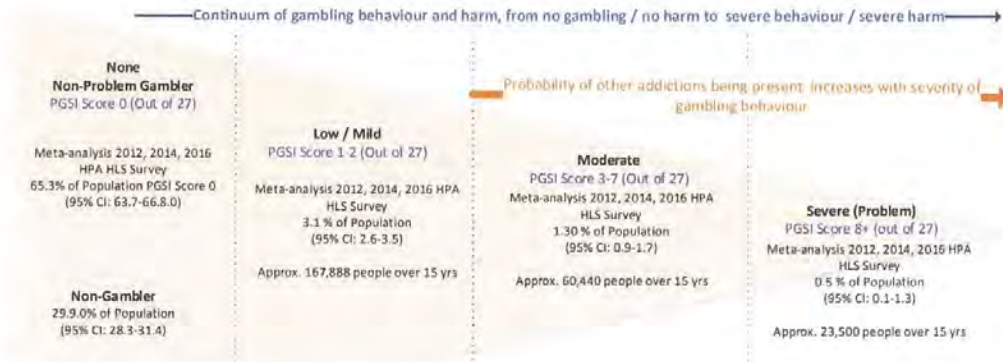


Figure 1: Continuum of Gambling Behaviour and Harm (Ministry of Health, 2019)

23. Moreover, a New Zealand gambling study estimate that 30% of EGM losses is from problem and moderate risk gamblers (6).
24. While the Ministry of Health's client intervention data is not an accurate measure of the prevalence of gambling harm in New Zealand, it can tell us the rate of harm from different classes of gambling amongst those who have sought help.
25. Data for 2021/22 shows that of the 4,534 individuals who received full intervention support for their own or someone else's gambling, 2,111 (46.6%) were for Class 4 EGMs (7).

Primary Mode	Full Interventions	Percentage
Non-Casino Gaming Machines (EGMs or Pokies)	2,111	46.6%
Lotteries Commission Products	535	11.8%
Casino Table Games (inc. Electronic)	388	8.6%
Casino Gaming Machines (EGMs or Pokies)	420	9.3%
TAB (NZ Racing Board)	394	8.7%
Housie	40	0.9%
Cards	41	0.9%
Other	605	13.3%
<b>Total</b>	<b>4,534</b>	<b>100%</b>

Table 1: 2021/22 client intervention data by primary gambling mode.

26. Given that almost half of the clients in 2020/21 sought help due to Class 4 EGMs (7), this indicates the level of harm EGMs are causing in our communities.





### ONLINE GAMBLING

27. Online gambling is the purview of the DIA who have indicated that they will address online gambling within legislation.
28. We also note that online gambling is not within the scope of the Council's Class 4 gambling policy review.
29. In its submissions, the Gaming Machine Association of New Zealand (GMANZ) and other industry proponents suggest that an 'unintended consequence' of a reduction in physical gaming machines could be an increase in online gambling. There is no evidence that this occurs more rapidly due to a sinking lid policy.
30. Rather, the COVID-19 lockdowns have shown that while there was an increase in online gambling during lockdown (namely, MyLotto sales) (8, 9), people returned to Class 4 gambling after the lockdown. This was highlighted when the DIA saw an increase in GMP by 116% in the June to September 2020 quarter, which followed the COVID-19 lockdown in 2020 (10).

### DENSITY OF CLASS 4 GAMBLING VENUES

31. What makes Class 4 EGMs more harmful than casino EGMs is their location within our communities and the design of EGM rooms within Class 4 venues.
32. Data published by the DIA shows that almost 61% (623 out of 1,023 as at 31 March 2023) of Class 4 gambling venues in New Zealand are located in medium-high or very-high deprivation areas (2).

Very Low Decile 1–2	Medium Low Decile 3–4	Medium Decile 5–6	Medium High Decile 7–8	Very High Decile 9–10
69	140	191	282	341

Table 2: Class 4 gambling venues as at 31 March 2023 by deprivation score.

33. In Buller, all eight Class 4 gambling venues (as at 31 March 2023) are located in very-high deprivation areas (2).
34. A report commissioned by the Ministry of Health notes that EGMs in the most deprived areas provide over half of the total Class 4 EGM expenditure (11).



#### IMPACT OF GAMBLING HARM TO VULNERABLE POPULATION GROUPS

35. It is unethical that the majority of Class 4 EGM expenditure is coming from our lowest income households who can least afford it.
36. This is particularly concerning given that this disproportionately impacts Māori who generally live in the areas where many of these machines are situated. We note that 11.2% of Buller's population are Māori (4).
37. The 2020 Health and Lifestyles Survey estimates indicated that Māori were 3.13 times more likely to be moderate-risk or problem gamblers than non-Māori and non-Pacific peoples (12).
38. Research indicates that Māori experience harmful gambling differently, and that this disparity has not diminished over the years. This is a systemic issue that is inequitable.

#### EFFICACY OF A SINKING LID

39. From a public health perspective, there's a generally held view that the easier it is to access an addictive product, the more people there are who will consume that product.
40. It follows then that stronger restrictions on the number and location of addictive products, such as EGMs, constitute a public health approach to the prevention and minimisation of gambling harm.
41. Sections 92 and 93 of the Gambling Act mandate the maximum number of pokie machines a Class 4 venue can host (18 if the venue licence was held on or before 17 October 2001, nine if the licence was granted after that date). This is the minimum regulation a TLA must implement in its Class 4 gambling policy, however many TLAs have chosen to adopt stronger regulations.
42. The Auckland University of Technology's New Zealand Work Research Institute recently published a research paper, *Capping problem gambling in New Zealand: the effectiveness of local government policy intervention*, which aimed to understand the impact of public policy interventions on problem gambling in New Zealand (13).
43. This research focussed on Class 4 gambling to assess the impact of local government interventions (absolute and per capita caps on the number of machines and/or venues and



sinking lid policies) on the number of machines/venues and the level of machine spending over the period 2010-2018.

44. Key findings from this research include:

- a. All three forms of policy intervention are effective in reducing Class 4 venues and EGMs, relative to those TLAs with no restrictions beyond those mandated by the Gambling Act.
- b. Sinking lids and per capita caps are equally the most effective at reducing machine spending.
- c. Those TLAs who adopted restrictions above and beyond those mandated by the Gambling Act experienced less gambling harm than those TLAs who have not.

#### THE FUNDING SYSTEM

45. Following the removal of tobacco funding, EGMs were introduced with the primary purpose of funding communities.
46. Trusts and Societies are required to return 40% of GMP to the community by the way of grants or applied funding. This has inextricably linked gambling harm with the survival of community groups, sports and services.
47. However, it cannot be guaranteed that the GMP lost in Buller is returned to groups in Buller. For example, of the \$2.5 million lost in Buller in 2022 (2), around \$842,000 was returned to organisations based in Buller (14). This is only around 33% of the amount lost in 2022.
48. Moreover, the unethical nature of the funding model cannot be ignored. The *Gambling Harm Reduction Needs Assessment* (2018), prepared for the Ministry of Health, raises fundamental questions about the parity of this funding system (15).
49. Further research commissioned by the DIA revealed that there is a very strong redistributive effect from more deprived communities to less deprived communities when examining the origin of GMP and the destination of Class 4 grants (16).





50. Overall, less deprived communities (decile 1-5) provided 26% of the GMP but receive 88% of the grants. Conversely, more deprived communities (decile 6-10) provide 74% of the GMP but receive only 12% of the grants (16).

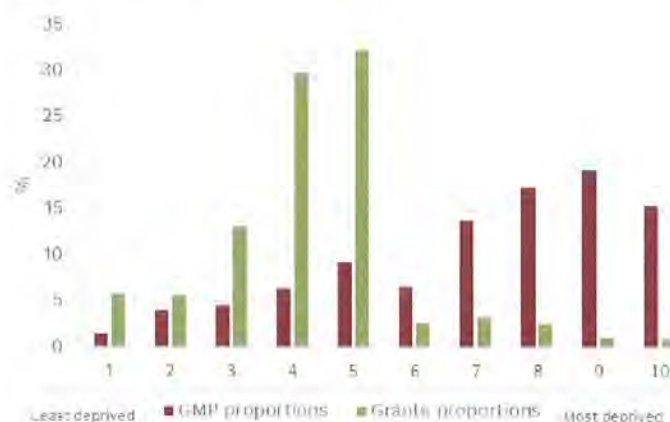


Figure 2: The origin of GMP and the destination of Class 4 grants by socio-economic decile (BERL, 2020)

51. There is a need for a transparent and sustainable funding system to support groups in our communities. This is a sentiment that is shared by other councils, including Hutt City Council, who have decided to take proactive steps to not apply for and accept Class 4 funding.

#### PRIORITISING THE PREVENTION OF HARM

52. While a sinking lid is at present the best public health approach available to TLAs to prevent and minimise gambling harm in their communities, we contend that such a policy does not go far enough – or work fast enough – to do this.
53. Several councils have already expressed their frustration at the limited opportunities available to them in their attempts to reduce the harm from Class 4 gambling in their communities.
54. We also encourage the Council to advocate to central government for the following:
- Adoption of a more sustainable, ethical, and transparent community funding system.
  - More powers for councils to remove EGMs from their communities.



- c. The urgent removal of Class 4 EGMs from high deprivation areas 7-10 in New Zealand.

## CONCLUSION

- 55. The Gambling Act 2003 was enacted to provide a public health approach to the regulation of gambling and to reduce gambling harm.
- 56. A sinking lid – with no relocations or venue mergers permitted – is the best public health approach available to councils who wish to prevent and minimise gambling harm in their communities.
- 57. PGF appreciates the opportunity to make a written submission on the Council's Class 4 gambling and TAB venue policy.



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21<sup>st</sup> August 2023

Buller District Council  
PO Box 21  
Westport 7866

Tēna koutou,

### **Submission on Buller District Council's Class 4 Gambling and TAB Venue Policy review**

1. Thank you for the opportunity to submit on Buller District Council's Class 4 Gambling and TAB Venue Policy review. This submission has been compiled by Te Mana Ora | Community and Public Health, National Public Health Service, Te Whatu Ora. Te Mana Ora recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
2. This submission sets out particular matters of interest and concern to Te Mana Ora.

### **General Comments**

3. Te Mana Ora welcomes the opportunity to comment on the first round of the Buller District Council's Class 4 Gambling and TAB Venue Policy review. Te Mana Ora recognises that while Council has no control over other forms of gambling within its district, it is charged with the regulation of the Class 4 Gaming and TABs within the Buller District.



4. The current Class 4 Gambling and TAB policy has remained unchanged since 2009. Te Mana Ora is pleased to see Council is undergoing a scoping consultation with the community to inform this review and we anticipate this will lead a strengthened policy.
5. Te Mana Ora recommends revising the policy to further minimise harm from gambling, ensuring the wide scope of impacts from gambling are considered during the review process. One of the most effective ways to minimise gambling harm over time is to reduce the number of gaming machines and venues. The sinking lid approach has been shown to reduce gambling expenditure relative to regions not adopting policies beyond national-level restrictions.<sup>1</sup> One way to consider the impacts of gambling and various harm-minimising approaches is through a social impact assessment. Further details are provided below under Specific Comments.
6. The future health of our populations is not just reliant on hospitals, but on a responsive environment where all sectors work collaboratively to address the determinants of health.
7. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. Health care services manage disease and trauma and are an important determinant of health outcomes. However, health creation and wellbeing (overall quality of life) is influenced by a wide range of factors beyond the health sector.
8. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the 'social determinants of health'.<sup>2</sup> The diagram<sup>3</sup> below (Figure 1) shows how the various influences on health are complex and interlinked.

1 Erwin C, Pacheco G, Turcu A. The Effectiveness of Sinking Lid Policies in Reducing Gambling Expenditure. *J Gambli Stud.* 2022 Sep;38(3):1009-1028. doi: 10.1007/s10899-021-10069-4.

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3 Barton, H and Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health* 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>





Figure 1. The determinants of health and wellbeing, Barton and Grant 2019.

9. The most effective way to maximise people's wellbeing is to take these factors into account as early as possible during decision making and strategy development. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government, if they are to have a reasonable impact.<sup>4</sup>

### Gambling Harm

10. Gambling can lead to significant health, social, and economic harms for individuals and families.<sup>5</sup> Harmful gambling can occur across the spectrum of gambling symptom severity (i.e. low risk, moderate risk and problem gambling) and continues to impact all aspects of wellbeing for individuals, their whānau and communities.<sup>6</sup> Recent research about the burden of gambling harm in New Zealand identified six main areas of

<sup>4</sup> McGinnis JM, Williams-Russo P, Knickman JR. 2002. The case for more active policy attention to health promotion. *Health Affairs*, 21(2): 78 - 93.

<sup>5</sup> Browne M, Bellringer M, Greer N, Kollandai-Matchett K, Langham E, et al. (2017) Measuring the burden of gambling harm in New Zealand: Central Queensland University and Auckland University of Technology.

<sup>6</sup> Latvala, T., Lintonen, T., & Konu, A. (2019). Public health effects of gambling. Debate on a conceptual model. *BMC Public Health*, 19(1), 1–16.

gambling harm: decreased health (both morbidity and mortality), emotional/psychological distress, financial harm, reduced performance at work or education, relationship disruption/conflict/breakdown and criminal activity, including theft from family members, businesses and communities.<sup>7</sup>

11. Research has found that gambling causes two and a half times the amount of harm from a chronic condition like diabetes, and three times the amount of harm from drug use disorders.<sup>8</sup>
12. Gambling harm not only affects the problem gambler but also their friends and family. Gamblers also underestimate the negative effects of their gambling on family/whānau members, children and home life.<sup>9</sup> In 2020, 4.5% of Health and Lifestyles survey respondents reported experiencing at least one form of household-level gambling harm in the last 12 months, an estimated 183,000 adults nationally.<sup>10</sup>
13. Harmful gambling typically presents with other health issues such as; higher levels of alcohol consumption, smoking and other-drug use.<sup>7</sup> Problem gambling behaviour also has substantial links to mental health problems and psychological wellbeing with problem gamblers reporting higher rates of depression and anxiety. Evidence suggests those with depression may not only use gambling to manage their symptoms but suffer depression because of their gambling.<sup>11,12,13</sup>
14. The risks and prevalence of harmful gambling in our community are inequitably distributed, with Māori and Pacific peoples the most at-risk and with the highest prevalence of harmful gambling.<sup>15</sup>

7 Central Queensland University & Auckland University of Technology. 2017. Measuring the burden of gambling harm in New Zealand. Wellington, NZ: Ministry of Health.

8 Central Queensland University & Auckland University of Technology. 2017. Measuring the burden of gambling harm in New Zealand. Wellington, NZ: Ministry of Health.

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13 SHORE. (2008). Assessment of the Social Impacts of Gambling in New Zealand. Auckland: Ministry of Health. Retrieved from [http://www.shore.ac.nz/projects/Gambling\\_impacts\\_Final%2010\\_02\\_09.pdf](http://www.shore.ac.nz/projects/Gambling_impacts_Final%2010_02_09.pdf)



15. Harms from gambling also include economic costs. For example, the New Zealand Institute of Economic Research suggests retail and hospitality industries lose significant revenue because of gambling spend.<sup>14</sup>

### Specific Comments

#### Policy review process

16. The current Buller District Council Class 4 Gambling and TAB policy has remained unchanged since 2009. Te Mana Ora is pleased to see Council is undergoing a scoping consultation with its community to inform this review and we anticipate this will lead a strengthened policy.
17. Under its previous name of Community & Public Health West Coast, Te Mana Ora has made various submissions to Buller District Council over time, recommending Council undertake a Social Impact Assessment process when reviewing gambling policy.
18. Te Mana Ora recommends that Council, as part of the scoping process during the review of the Class 4 Gambling and TAB Policy, undertakes a Social Impact Assessment (SIA) workshop to better understand the breadth of impacts of Class 4 Gaming in the Buller community. Te Mana Ora offer our assistance to carry out such an SIA.
19. Social Impact Assessment (SIA) is a process that gathers information and makes recommendations to guide a review or development of a policy. This process provides a platform to engage with a wide variety of stakeholders, including community groups and organisations, who have an interest in the effects of the policy. The process assists with balancing the economic, environmental and social needs to promote more positive outcomes.
20. Te Mana Ora has previously partnered with both the Westland and Grey District Councils to use a SIA process in development and reviews of their Class 4 and TAB policies. In each case this entailed running a workshop with a variety of stakeholders

<sup>14</sup> Hogan, S., & Siddharth, P. (2020). The retail employment and tax costs of Class 4 gambling in New Zealand. [https://www.nzier.org.nz/hubfs/Public%20Publications/Client%20reports/final\\_report\\_-\\_diverting\\_gambling\\_losses\\_22\\_june.pdf](https://www.nzier.org.nz/hubfs/Public%20Publications/Client%20reports/final_report_-_diverting_gambling_losses_22_june.pdf)

within the district, including Council, iwi and hāpu, health, community agencies, and current TAB and Class 4 license holders. The objectives of each of the workshops was to identify what stakeholders saw happening within their communities with respect to TAB and Class 4 gambling, and to assess the current policy with respect to how well it was meeting the legislative requirement to prevent and minimise gambling-related harm. In each case a report was completed that included recommendations to the relevant Council to inform their draft policy.

### Feedback on the consultation document

21. Te Mana Ora recommends a sinking lid option across each of the categories listed below. This will ensure no new gaming machines or venues, or TAB venues are permitted in the district.

- The number of Gaming Machines allowed in the district
- Number of venues in the district
- Venue location for both Gambling Venues and Board (TAB) venues
- Number of Gaming Machines allowed per Class 4 Gambling venue

22. Te Mana Ora recommends that no consent for the relocation of licenses to other venues is permitted (excepting the Waikiwi precedent<sup>15</sup>). However, should the new policy permit relocation, it is recommended that any relocation is only to an area with a deprivation level below NZDep7.

23. The Council's existing policy states, *"restricting the number of gaming machines that may operate in the district limits the opportunities for people to gamble. Limiting gambling opportunities will help prevent and minimise harm from gambling."*

However, outside of those stated in the legislation, the only conditions in the current policy regulating the number of machines are:

- *that the primary activity of each C4G and TAB venue being that of entertainment, recreation, or leisure focused on persons 18 years and over, and*
- *the premises being authorised under the Sale of Liquor Act 1989 to sell and supply liquor for consumption on the premises.*

<sup>15</sup> Relocations and the Waikiwi decision. (2019). Te Tari Taiwhenua | Department of Internal Affairs. <https://www.dia.govt.nz/Gambling-territorial-authorities-applying-policies-relocations-Waikiwi-decision>



Furthermore, while the current policy identifies the criteria that Council will consider when assessing Class 4 Gaming venue and TAB venue applications, the policy gives no indication of how these considerations are evaluated. For example, many Councils' gaming policies have specific exclusion zones (often 100 metres) around residential areas, automatic teller machines, and sensitive sites (e.g. educational or health facilities, places of worship), as well as the distance any gaming venue can be to another. Including such details would guide Council to consistent decisions and give both the community and any potential applicant clarity regarding the criteria. Te Mana Ora recommends that if a sinking lid approach is not adopted then clear criteria regarding set-backs to sensitive sites and other areas of concern should be included in the policy.

#### **Venue and machine ratios with total New Zealand**

24. The Buller District has a very high number of Class 4 venues and gaming machines per capita when compared with the rest of New Zealand (See Table 1).
25. Class 4 Gaming venues in New Zealand are disproportionately located in areas of economic deprivation, with around 50% located in deprivation deciles of eight to ten.<sup>16</sup> This increases the risk of harmful gambling as people living in these most deprived areas spend on average up to three times more on Class 4 gambling compared with people in the least deprived area.<sup>17</sup>
26. All Class 4 venues within the Buller district are situated in either deprivation decile 9 or 10; the highest deciles for deprivation.
27. As shown in Table 1 below, the Buller District ratio of current venue and machine numbers to population differs significantly from the national ratio. When broken down to areas within the district that have the machines these ratios become even more significant, with Westport being three times, Karamea almost four times (3.7) times, and Reefton five times the national ratio for machines to head of population.

<sup>16</sup> Malatest International. (2021). Gambling Harm Needs Assessment 2021. <https://www.health.govt.nz/system/files/documents/publications/gambling-harm-needs-assessment-2021.pdf>

<sup>17</sup> Ward, Adam D., Jack T. McIvor, and Paul Bracewell. 2020. "The Geographic Distribution of Gaming Machine Proceeds in New Zealand." *Kōtuitui: New Zealand Journal of Social Sciences Online* 15 (1): 54–74. <https://doi.org/10.1080/1177083X.2019.1640752>.

## Te Whatu Ora

Health New Zealand

Table 1. Class 4 Gaming machines in Buller District compared to New Zealand, including a breakdown per area.

CENSUS 2018	VENUES AUGUST 2023	VENUE RATIO (PER HEAD OF POPULATION)	MACHINES AUGUST 2023	MACHINE RATIO (PER HEAD OF POPULATION)
<b>BULLER</b> POP: 9 591 CENSUS 2018	8	1: 1,199	72	1: 133
<b>NATIONAL</b> POP: 4,699,755 CENSUS 2018	1,023	1: 4,594	14,464	1: 325
<b>BULLER AREAS</b>				
<b>WESTPORT (SOUTH, NORTH &amp; RURAL)</b> POP: 5649 CENSUS 2018	5	1:1,130	53	1:106
<b>REEFTON</b> POP: 927 CENSUS 2018	2	1: 463	15	1:62
<b>KARAMEA</b> POP: 354 CENSUS 2018	1	1:354	4	1: 88

28. Te Mana Ora is unaware whether existing venues are operating the maximum number of machines allowed under their licenses. We have taken an educated guess and assumed that, under the current policy, it is possible machine numbers could increase by 27; three of which may be in Reefton and five in Karamea. This would increase the difference in ratios between Buller and New Zealand as whole.

29. Given that there are currently no TAB venues in Buller, Te Mana Ora recommends Buller District Council does not allow the establishment of TAB venues as this will only increase access to gambling and the potential for gambling related harm. Section 9.6.3 of the 2020 Racing Act states '*The policy must specify whether or not new TAB venues may be established in the territorial authority district and, if so, where they may be located.*' Therefore, Council does not have to allow the establishment of TAB venues.



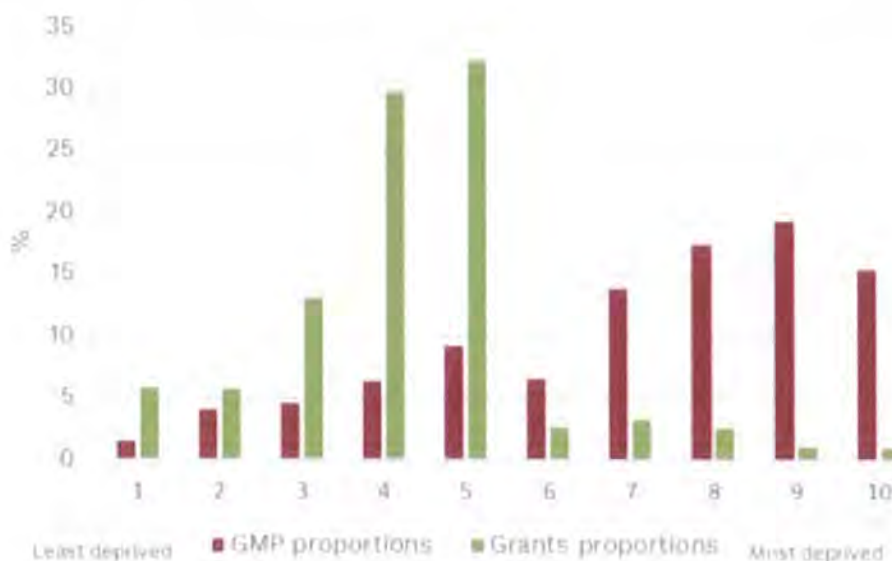
### Proceeds of gambling funds

30. According to the Problem Gambling Foundation, approximately \$2.5 million (about \$7000 per day) was lost on Class 4 gambling in the Buller District in 2022; an increase of around \$93 000 compared to 2021.<sup>18</sup>

31. While the Gambling Act acknowledges that gambling is part of life in New Zealand, the statement in the current policy *that many community groups rely on funding from the proceeds of Class 4 gaming* is pertinent as up to two-thirds of the money paid out in community grants comes from the money problem gamblers have spent and lost on gambling.<sup>15</sup>

32. Graph 1 below illustrates how the distribution of grants paid out by Trusts and Societies to recipients come from New Zealanders who are the most deprived and goes to New Zealanders who are less deprived.<sup>15</sup>

*Graph 1: Origin of Gaming Machine Profit and destination of community and sports grants by deprivation in New Zealand<sup>19</sup>*



<sup>18</sup> Department of Internal Affairs. Gaming machine profits (GMP dashboard) 2023 [Available from: gmp-quarterly-dashboard-march-2023.xlsx (live.com) Quarterly List of Venue and GM Numbers for March 2023 [accessed 14 August 2023], including venue names and address obtained from Te Tari Taiwhenua | Department of Internal Affairs gambling statistics historical data venues machine numbers - dia.govt.nz.

<sup>19</sup> Cox, M., Hurren, K., & Nana, G. (2019). A proposed approach for assessing the effects of gambling on wellbeing in New Zealand.

33. This transfer of wealth indicates that Class 4 gambling tends to magnify community disadvantage.<sup>20</sup>

### Conclusion

34. Te Mana Ora wishes to be heard in support of this submission. We also offer our services to conduct a social impact assessment in partnership with Buller District Council.

35. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.

36. Thank you for the opportunity to submit on Buller District Council's Class 4 Gambling and TAB Venue Policy review.

Ngā mihi



**Vince Barry**

Regional Director Public Health Te Waipounamu  
National Public Health Service

### Contact details

Rosie McGrath  
For and on behalf of Te Mana Ora



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<sup>20</sup> Cox, M., Hurren, K., & Nana, G. (2019). A proposed approach for assessing the effects of gambling on wellbeing in New Zealand.



Submission to Buller District Council:  
Proposed Class 4 Gambling Venues Policy

August 2023

## 1. INTRODUCTION

We are pleased to submit The Lion Foundation's (TLF) response to the Buller District Council's Review in respect of the Class 4 Gambling and TAB (Board) Venues Policy. Our submission relates to Class 4 Gambling only.

The Lion Foundation is one of New Zealand's largest gaming machine societies by venue number, machine number and money returned to the community through grants.

Formed in 1985, we have distributed over \$1 billion in grants to local, regional and national community causes since our inception and over \$42.3m in our 2022/2023 financial year.

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

## 2. SUMMARY OF THE LION FOUNDATION'S POSITION – Class 4 Gambling Venues

The Lion Foundation supports the retention of the status quo. TLF does not support the adoption of a sinking lid policy. Our full submission is set out hereunder.

We would advocate for the inclusion of a suitable relocation clause.

We would appreciate the opportunity to make an oral submission (online) in respect of our submission.

## 3. ABOUT THE LION FOUNDATION (TLF)

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

Our focus is on compliance and the reduction of gambling harm. The Lion Foundation is not here to grow or promote gambling.

We currently operate Electronic Gaming Machines (EGMs) at 1 venue in the district: -

Hotel Reefton

Operating 6 EGMs (entitlement of 8 EGMS)

The Venue Operator and Manager of this venue are members of the local community and have the community's interest at the heart of the business.

Venue Operators receive a limited /capped payment – defined by the Gambling Act and related Regulations, more specifically the Gambling (Venue Payments) Regulations 2016<sup>1</sup>. The venue

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<sup>1</sup> <https://www.legislation.govt.nz/regulation/public/2016/0191/latest/DLM6917617.html>

payment is a fair and equitable payment designed to compensate the Venue Operators for the operational costs (staffing etc) incurred in operating the EGMs for the Class 4 Society

#### 4. GAMING MACHINE FUNDING

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

All local and regional grants are considered by a Regional Grants Committee, comprised of local community members, who are extremely well placed to ensure that grant funding lands where it is most needed.

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

- Sport
- Community, Arts & Culture
- Health
- Education

Please find a list of grants distributed from funds generated in the district. Wherever possible, the members of the Regional Grants Committee endeavour to distribute funding to organisations within the district, however included in the list of grants distributed are some grants that are distributed to organisations outside of the Buller District .

In these few instances, the members of the grants committee have determined that the community within Buller benefits directly from the services provided by these organisations, and accordingly it is appropriate to utilise a small percentage of "local funds" to support these excellent organisations.

As stated previously, approximately 10% of all funds generated from all venues is allocated to national organisations, which include (not an exhaustive list):

Life Education Trust	Royal NZ Ballet	Graeme Dingle Foundation
Holocaust Centre of NZ	NZ Football	Surf Lifesaving NZ Inc
Special Olympics NZ	Netball NZ	Basketball NZ
Endometriosis N Z	Assistance Dogs NZ	Royal NZ Plunket Soc Inc
Barnardo's N Z	NZ Spinal Trust	NZ Rugby League Inc

It is important to note that TLF has stringent processes that are employed when a grant is assessed to ensure that grant funding lands where it is supposed to land. Grants can only be distributed for authorised purpose (Gambling Act) and can only be distributed upon successful application.



TLF acknowledges that a vast majority of volunteer-based community organisations do not always have the ability to navigate the process that is involved in applying for Class 4 funding. The highly regulated and complicated granting process is difficult enough for professional funding advisors to navigate. In an effort to ensure that all community organisations have a fair opportunity to access community funding, TLF has launched a series of educational webinars. The webinars provide valuable *"how to information"* and are proving to be a success. These webinars supplement the ongoing work that TLF's Grants Advisors undertake within the community.

We commenced this submission by stating that consideration needs to be given to the total impact that gambling has on and within our communities.



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. The current policy is working and balances the potential harm from gambling whilst preserving access to community funding. A sinking lid does not preserve community funding.

In 2021, approximately \$269m of grant funding was approved across 19,148 grants to 10,967 different organisations<sup>2</sup>. In addition, over \$50m was applied by various RSAs and Workingmen's Clubs (\$50m) to support their own activities. 54% of the grants distributed in 2021 were sports related. The second most popular category was community (20%).

The 2021 TDB Advisory report, *Gambling in New Zealand: A National Wellbeing Analysis*<sup>3</sup>, found that gambling in New Zealand had a net positive wellbeing benefit totalling \$1.74b to \$2.16b per annum. We would encourage the decision makers to avail themselves of the information contained in this report.

As part of an initiative to inform the Department of Internal Affairs of the value of Community funding in response to a Discussion Document (*Reducing Pokies Harm 2022*), the Gaming Machine Association of New Zealand (GMANZ) collated feedback from numerous community organisations. A very small sample of this feedback: -

<sup>2</sup> <https://www.gamblinglaw.co.nz/download/Class-Four-Gaming-Analytical-Review-2021.pdf>

<sup>3</sup> [https://www.gamblinglaw.co.nz/download/Gambling\\_in\\_New\\_Zealand.pdf](https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf)



**GMANZ - Please explain, in as much detail as you can, how a reduction in community grants would affect your service, group members, and the wider community.**

- ❖ *"A reduction in funding would see a reduction in service and experience, ultimately leading to a decrease in the number of people taking part in sport. This would be a social disaster for a country so long the envy of the world to have a declining participation in sport base that this would create."*
- ❖ *"The less funding we currently annually receive to pay for our leased offices, means the less we are able to deliver our mission which is to grant the one wish of all children aged 3-17 who are living with a critical illness. Funding from Class 4 community grants is critical to our ability to continue to deliver on our mission."*
- ❖ *"We are in a low decile community and rely heavily on grant funding to support our operations. We are an amateur multi-sports club (mainly rugby) and no, or reduced, grant funding would force our closure. This would deny hundreds of kids the opportunity to get into sport, deny them a safe haven, and be an absolute affront to the thousands of volunteers who have helped the club grow over the last 100+ years."*
- ❖ *"Cancer Society benefits from these grants, it helps us to cover the cost of salary and events. This will have a direct effect on our services we provide to the wider community"*
- ❖ *"We are a voluntary lifeguard service and reduced funding would impact our ability to offer a front line rescue service. Community grants allow us to purchase equipment for training and subsidize a coach without which over 50 young people would lose out."*

## 5. POLICY DISCUSSION – Retention of Status Quo

- The Lion Foundation supports and encourages the retention of the status quo. We suggest that there is no evidence to support the adoption of a more restrictive policy.
- In June 2016 – data available on the website of the Department of Internal Affairs confirmed 8 venues in the district, and a total of 76 EGMS. As at March 2023 – the number of venues has remained the same, however, the number of EGM's has decreased to 72<sup>4</sup>.
- There is no evidence that a reduction in venues or machines results in a reduction in problem gambling<sup>5</sup>.
- The Gambling Harm Needs Assessment 2021<sup>6</sup> (commissioned by the Ministry of Health) has identified that:

<sup>4</sup> <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard/resource/60081bcd-f2ae-4b97-8a9f-fe449fa59969>

<sup>5</sup> National Gambling Study, MOH, 2012-2015. *The National Gambling Study (NGS) was the first NZ longitudinal study into gambling, health, lifestyles, and attitudes about gambling. Evidence to date shows that there is no correlation between the number of machines and the prevalence of people seeking help for problem gambling.*

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

<sup>6</sup> <https://www.health.govt.nz/system/files/documents/publications/gambling-harm-needs-assessment-2021.pdf>

- ❖ The prevalence of harmful gambling remains relatively unchanged (page 7). The most recent gambling participation and prevalence data captured in the HLS survey showed that between 2016 and 2018, the prevalence of harmful gambling among adults (aged 15 years and over) in New Zealand remained relatively unchanged (Te Hīringa Hauora, 2018) (page 32 of the Report).
- The New Zealand National Gambling Study: Wave 4 (2015) found that the problem gambling rate was 0.2% of people aged 18 years and over (approximately 8,000 people nationally). The problem gambling rate is for all forms of gambling, not just gaming machine gambling<sup>7</sup>.
- The statement of proposal states that the number of people seeking help has increased rapidly over the years. According to the most reliable source of data – this statement is simply incorrect. Data available suggests that excluding brief interventions the number of people seeking help has been and remains consistently low.
- The Statement proposal seeks to rely on data that includes brief interventions. The Ministry of Health, in calculating the problem gambling levy relies on the number of interventions **excluding** brief interventions.
- In terms of reliable data over several years – the total number of clients assisted by problem gambling service providers (for all forms of problem gambling) has not exceeded a total of 4 (excluding brief intervention)<sup>8</sup> since at least July 2017.
- The Gambling Harm Needs Assessment 2021 report (commissioned by the Ministry of Health) has identified:
  - ❖ The total number of clients for all interventions was 9,502 (including 2,875 existing clients and 6,627 new clients) – a decrease of 10.4% (-1,100 clients) compared with the previous year (page 42).
  - ❖ The total number of clients, excluding brief interventions, was 4,439 (including 2,487 existing clients and 1,952 new clients) – a decrease of 8.6% (-417 clients) compared with the previous year (page 42).
  - ❖ Users of the Gambling Helpline decreased by 30%, falling from 4,806 users in 2017 to 3,328 in 2019 (page 45).
  - ❖ The treatment providers have failed to encourage persons at risk to use their services
- Available research has concluded that gambling is a popular form of entertainment that people find enjoyable.
  - ❖ Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.<sup>9</sup>
  - ❖ Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of

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

<sup>8</sup> <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#total-assisted> Refer table 10

<sup>9</sup> Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. <https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf>.

wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.<sup>10</sup>

- Furthermore, TLF believes adopting a more restrictive policy – ie a sinking lid policy is not appropriate given the significant measures that are already in place to minimise the harm from gaming machines. By way of example (not an exhaustive list):
  - ❖ There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
  - ❖ There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won.
  - ❖ Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
  - ❖ ATMs are excluded from all gaming rooms.
  - ❖ All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
  - ❖ All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.
  - ❖ All gaming venues have a harm minimisation policy.
  - ❖ All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
  - ❖ It is not permissible for a player to play two gaming machines at once; and
  - ❖ 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).
- Commentary in regard to Option b – a capped policy:
  - ❖ We commenced the submission by stating that TLF is not here to grow gambling, or promote the growth of gambling.
  - ❖ Without contradicting our position in support of the retention of the status quo, TLF does recognise the value of a capped policy.
  - ❖ The analysis of this option is in our opinion a good analysis, but for the fact that there is an assumption that local business opportunities could be limited if it becomes uneconomic to operate with fewer machines. No evidence is offered to support this assumption, and as such we would argue that the assumption is unfounded, given the fact that the number of venues has not increased since at least 2017, and the number of EGMS operating has in fact declined naturally. There is no evidence to suggest that businesses have applied (unsuccessfully or otherwise) to increase the number of EGMS despite having emerged from 4 years of tremendous hardship for the hospitality sector (COVID). If adopted a capped policy would ensure that:

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<sup>10</sup> Suits, D. (1979). The Elasticity of Demand for Gambling. *The Quarterly Journal of Economics*, 93(1), 155–162.  
<https://doi.org/10.2307/1882605>

- Council maintains control over the growth of gambling as intended by the Gambling Act.
- The existing levels of community funding can be maintained.

## 6. RELOCATION CLAUSE

We would request that serious consideration be given to the inclusion of a relocation clause.

Venue relocation is an effective harm minimisation tool – it allows for venues to relocate from high deprivation areas to more suitable areas.

Appropriate wording for a suitable relocation clause:

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

- *Where the venue is intended to replace an existing venue within the district;*
- *Where the existing venue operator consents to the relocation; and*
- *Where the proposed new location meets all the other requirements in this policy.*

*In accordance with section 97A, 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), when the new venue is established following a consent being granted under this relocation provision, the old venue is treated as if no gaming machine venue licence was ever held for the venue. The old venue will therefore require a Council consent before being relicensed to host gaming machines and will be limited to a maximum of 9 machines if such a consent is granted.*

## 7. UNREGULATED ONLINE OFFSHORE GAMBLING

Of great concern is the fact that problem gambling associated with **offshore based online gambling** is growing exponentially. By supporting the adoption of sinking lid policies and therefore supporting and encouraging the closure of physical and safe Class 4 gambling environments, the advocates of sinking lid policies are driving [potential problem] gamblers into a world of unregulated and potentially harmful gambling.

The Gambling Harm Needs Assessment 2021 has identified that: -

- ❖ Access to online gambling for money has increased. Gambling Harm services, lived experience and gambling industry representatives (of which we are one) indicated ( at page 26) :-  
*“How easy it is to start to gamble. Just out of boredom. Instead of going to the pub, you can just stay home, download the apps and enter your card details. So it’s definitely changed within the past three years. It used to be going down to the pub. Now it’s so effortless you just pop out your phone. (lived experience representative)”*

New Zealanders have been informed of the stark realities of the dangers of offshore online gambling by the media:<sup>11</sup>

Online gambling, whether it be pokies or playing live blackjack, is booming.

"When we look at our own customers, what we see is there is about \$30 million a month that's being spent on online gambling and 80 percent of that is offshore," said Julia Jackson, Kiwibank's head of purpose and sustainability.

"It really is [an incredible amount] and what's a really interesting trend that we've seen is from the first COVID lockdown in 2020, that number has massively increased and it hasn't gone down."

The offshore sites raking in millions are based in places including Malta, Cyprus, Gibraltar, Estonia, and Lithuania, where registered companies benefit from low taxes and can offer internet gambling to anyone in the world.

Offshore online gambling providers do not have to operate in accordance with the Gambling Act, do not offer any harm minimisation features to protect players; do not contribute to New Zealand communities.

Furthermore, offshore based online gambling poses considerable risk in that:

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

The Gambling Commission in its recent commentary - **REPORT ON THE PROPOSED PROBLEM GAMBLING LEVY: 2022-2025**, dated 10 February 2022<sup>12</sup>, suggested that the Ministry of Health should give –

*"Serious consideration should be given to including online gambling as a leviable sector within the problem gambling formula set out in section 320 of the Act. Online gambling is already responsible for a growing number of presentations to problem gambling service providers, a trend that is likely to continue as life moves increasingly online".*

<sup>11</sup> <https://www.newshub.co.nz/home/new-zealand/2022/03/kiwibank-customers-spending-30m-every-month-playing-on-online-gambling-sites.html>

<sup>12</sup> [https://www.gamblingcommission.govt.nz/GCwebsite.nsf/wpg\\_URL/Reports-Publications-Problem-Gambling-Levy-2022-2025?OpenDocument](https://www.gamblingcommission.govt.nz/GCwebsite.nsf/wpg_URL/Reports-Publications-Problem-Gambling-Levy-2022-2025?OpenDocument)

## 8. HARM MINIMISATION

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

We are committed to creating safe gambling environments in all our venues, and minimising the harm caused by problem gambling.

At TLF we play a considerable part in the prevention and minimisation of harm at the venues – *a fence at the top of the cliff* approach. We ensure our Venue Operators and their gaming staff are fully trained in all relevant areas of harm minimisation. We have released an online training system which has been developed by industry professionals. Input has been sought and received from all walks of life, including employees of the Salvation Army Oasis National Office. We are currently reviewing our training programme and resources to ensure compliance with the recently amended Harm Minimisation Regulations.

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

Our Account Managers are physically present in the venues on a weekly basis – ensuring compliance standards are met.

The Lion Foundation offers a range of harm minimisation material to the gambler in the venue – including, but not limited to, wallet cards with information for potential problem gamblers, signage in and around gaming rooms from the Health Promotion Agency, etc. Venue staff interaction and supervision and observation of patrons is also key to the minimisation of harm.

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





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

#### 9. PROBLEM GAMBLING LEVY 2022-23 TO 2024-25

Each year the Class 4 Gambling industry contributes significant amounts to a problem gambling levy **in addition** to in-house harm minimisation and prevention initiatives. With a budget of approximately \$76mil over a three-year period<sup>13</sup>, this funding allows the Ministry of Health to support and treat gambling addiction and to increase public awareness.

Has sufficient progress been made in previous years? In addition to extracts from The Gambling Harm Needs Assessment 2021 referenced in previous paragraphs, the report has furthermore identified:

- ❖ There was a common perception among interviewed participants from all gambling stakeholder groups, and many workforce survey respondents, that limited progress had been made across most objectives set out in the Strategy to Prevent and Minimise Gambling Harm 2019/20-2021/22 (page 8).
- ❖ In relation to objectives 1 and 2 (MoH Strategy 2019-2022), reducing gambling-related harm inequities for Māori, Pacific and Asian peoples, and ensuring Māori have healthier futures through the prevention and minimisation of gambling harm; most interviewed participants and around half of the workforce survey respondents considered that little to no progress had been made against both objectives (page 55).

Responding to the Draft Strategy to Prevent and Minimise Gambling Harm 2022-23 to 2024-25, the Gaming Machine Association of New Zealand has implored the Ministry to do things differently<sup>14</sup>. One glaring omission from the strategy is any investment at the top of the cliff – instead of repeating failed investment at the bottom of the cliff. It is disappointing to note that the Strategy to Prevent and Minimise Gambling Harm 2022-2023 2024-2025, which provides a budget of \$76 million over the

<sup>13</sup> <https://www.health.govt.nz/publication/strategy-prevent-and-minimise-gambling-harm-2022-23-2024-25>

<sup>14</sup> <https://www.gmanz.org.nz/resource/submission-strategy-to-prevent-minimise-gambling-harm-and-the-problem-gambling-levy-2022-2025/>

period hasn't answered the call for change. The report of the Gambling Commission has highlighted these deficiencies:-

## 2. EXECUTIVE SUMMARY

2.1 The Commission's recommendations are as follows:

(a) The total amount of the levy for the period 1 July 2022–30 June 2025 be set at \$76.123 million.

(b) The weightings of W1 (expenditure) and W2 (presentations) should be set at 30:70.

(c) Within the next levy period, the Ministry should undertake a *major strategic review* of its problem gambling strategy and use that review to determine the necessary funding requirements. *Rather than accepting a historically determined budget envelope*, the Ministry should re-assess the future analytical and operational requirements of an integrated problem gambling strategy and develop an updated comprehensive strategy with costings based upon those requirements.

(d) As part of this review, the Ministry should collaborate meaningfully with the main participants of this process; the gambling industry operators, the problem gambling service providers and those with lived experience, *in order to make use of their collective wisdom as part of the process to develop the new strategy*. As part of this review, the Ministry should initiate a long-term research programme which looks beyond the 3-year levy cycle in order to inform future decision making about what makes a real difference in reducing gambling harm in New Zealand.

(e) Serious consideration should be given to including online gambling as a leviable sector within the problem gambling formula set out in section 320 of the Act. Online gambling is already responsible for a growing number of presentations to problem gambling service providers, a trend that is likely to continue as life moves increasingly online.

(f) The Ministry and the Department of Internal Affairs (the "Department") should investigate whether more refined data can be collected in relation to online gambling expenditure and presentations. At present, "online gambling" appears to be discussed generically but there may be important distinctions from a policy perspective between New Zealand gambling operators which also have an online presence (Lotto, TAB NZ and SKYCITY) and those online operators that are based entirely offshore. Consideration should also be given to refining data in relation to the New Zealand gambling operators which provide both online and terrestrial gambling (Lotto, TAB NZ and SKYCITY). *These data may show whether there are material harm differences between participation in the same form of gambling online or at a physical venue.*

Despite these deficiencies, we hope that the next three years will see a decline in the rates of recidivism [amongst problem gamblers] and a positive change in the prevalence rates which has to date not been witnessed despite substantial investment over the past 10 years.

## 10. CONCLUSION

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

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

*For further comment or information please contact Tony Goldfinch at The Lion Foundation on [REDACTED] or email: [Tony.Goldfinch@lionfoundation.org.nz](mailto:Tony.Goldfinch@lionfoundation.org.nz); or Samantha Alexander on [REDACTED] or email: [Sam.Alexander@lionfoundation.org.nz](mailto:Sam.Alexander@lionfoundation.org.nz)*

Approved Grants -  
Payments by TLA

Filtered By:

Show: All tabs

Date Field: Payment Date equals Custom (4/04/2021 to 3/04/2022)

Allocated Amount greater or equal 1

AND TLA ID equals 3

Sorted By:

Grant Request: Org TLA: Grant Request: Org TLA - Sorted ascending

Grant Request: Category: Grant Request: Category - Sorted ascending

Grant Request: Grant Request Number	Grant Request: Organisation Name	Grant Request: Authorised Purpose	Grant Request: Amount Requested	Allocated Amount
<b>Grant Request: Org TLA: Buller District Council (6 records)</b>				
<b>Grant Request: Category: Education (1 record)</b>				
9032101	Reefton Area School	towards transport, accommodation and activities for 5& 6 year can Nov 2021 (excl GST)	\$8,549.00	\$7,000.00
<b>Grant Request: Category: Sport (5 records)</b>				
9032482	Buller Basketball Assn Inc	towards entry fees to basketball tournaments for 2021 (excl GST)	\$5,633.50	\$5,000.00
9035658	Buller Rugby Union Inc	towards Rugby Manager salary, April - Dec 2022	\$40,000.00	\$40,000.00
9032258	Kawatiri Group Riding for the Disabled Inc.	towards cost of paddock hand wages for the year April 2021 - March 2022	\$5,000.00	\$2,000.00
9032299	Reefton Jockey Club Inc	towards secretarial fees 2021 (excl GST and Raceday responsibilities)	\$5,000.00	\$2,000.00
9035799	Reefton Trotting Club Inc	towards secretarial fees, April - June 2022 (excl GST)	\$10,000.00	\$10,000.00
<b>Grand Totals (6 records)</b>				



Approved Grants -  
Payments by TLA

Filtered By:

Show: All tabs

Date Field: Payment Date equals Previous FY (4/04/2022 to 2/04/2023)

Allocated Amount greater or equal 1

AND TLA ID equals 3

Sorted By:

Grant Request: Org TLA: Grant Request: Org TLA - Sorted ascending

Grant Request: Category: Grant Request: Category - Sorted ascending

Grant Request: Grant Request Number	Grant Request: Organisation Name	Grant Request: Authorised Purpose	Grant Request: Amount Requested	Allocated Amount
Grant Request: Org TLA: Buller District Council (7 records)				
Grant Request: Category: Community - Culture - Arts (2 records)				
9037700	Citizens Advice Bureau - Buller	towards airfares for 2 members to attend Annual General Meeting in Wellington, Nov 2022 (incl GST)	\$676.00	\$676.00
9038389	Reefton Powerhouse Charitable Trust Inc	towards civil works around the construction of building and water races (excl GST)	\$15,000.00	\$8,000.00
Grant Request: Category: Health (1 record)				
9035980	Kawatiri Group Riding for the Disabled Inc.	towards wages of a Paddock Hand, May - Dec 2022	\$6,000.00	\$2,000.00
Grant Request: Category: Sport (4 records)				
9036760	Buller Basketball Assn Inc	towards travel & accommodation for U13/15/17 Rep teams (incl GST)	\$23,028.30	\$8,000.00
9040145	Buller Rugby Union Inc	towards salary of Rugby Development Officer	\$40,000.00	\$10,000.00

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9037921	Reefton Jockey Club Inc		towards secretarial fees (excl GST)	\$5,000.00	\$2,500.00
9040017	Reefton Trotting Club Inc		towards secretarial fees (excl GST)	\$10,000.00	\$6,900.00
Grant Request: Org TLA: Christchurch City Council (2 records)					
Grant Request: Category: Health (1 record)					
9039672	Cancer Soc of N Z Inc - Canterbury West Coast Division		towards annual rent for three of our Cancer Society community centres in Selwyn, West Coast and Ashburton (excl gst)	\$77,650.92	\$5,000.00
Grant Request: Category: Sport (1 record)					
9039551	Surf Life Saving N Z Inc - Southern		towards Rent in Christchurch and Dunedin and Wages - Club Development Officers - Christchurch, West Coast, Tasman and Otago and Southland (excl GST)	\$120,000.00	\$10,000.00
Grant Request: Org TLA: LF National (1 record)					
Grant Request: Category: Sport (1 record)					
9038577	Tennis N Z Inc		towards the Tennis NZ club Book A Court programme in specified regions around NZ (excl GST)	\$105,000.00	\$2,600.00
Grand Totals (10 records)					



Approved Grants -  
Payments by TLA

Filtered By:

Show: All tlas

Date Field: Payment Date equals Custom (3/04/2023 to 8/08/2023)

Allocated Amount greater or equal 1  
AND TLA ID equals 3

Sorted By:

Grant Request: Org TLA: Grant Request: Org TLA - Sorted ascending  
Grant Request: Category: Grant Request: Category - Sorted ascending

Grant Request: Grant Request Number	Grant Request: Organisation Name	Grant Request: Authorised Purpose	Grant Request: Amount Requested	Allocated Amount From Buller DC
Grant Request: Org TLA: Buller District Council (2 records)				
Grant Request: Category: Education (1 record)				
9040519	Reefton Area School	towards accommodation and activities for school camp, Oct 2023 (excl GST & van hire)	\$7,979.00	\$5,000.00
Grant Request: Category: Sport (1 record)				
9039509	Reefton Youth Development Trust	towards purchase of boxing equipment (skipping rope, boxing paddle, punch bag, boxer bag mitts, boxing gloves, headgear, timer boxer belly pad) for the development of the youth in Reefton (incl GST & excl groin guard, tracksuit, and boxing ring)	\$5,000.00	\$4,000.00
Grand Totals (2 records)				





## Clubs New Zealand Submission – Buller District Council Class 4 Gambling and TAB venue policy

### Introduction

Clubs New Zealand 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.

There is currently one club that operates gaming in the Buller District

- Club Buller – 10 electronic gaming machines.

### Summary

Clubs New Zealand asks that regard be had to the gaming machine funding generated at the club venue, in addition to external grants made from the commercial non-club venues located in the District. The funding generated from club venues can be applied or distributed to authorised purposes and is used to benefit the clubs' members (locals, and often the very same people who play the machines).

Clubs New Zealand is supportive of retaining the status quo in regard to the number of machines and venues in the district and the number of machines allowed per class 4 venue. Clubs New Zealand believes the current approach is robust.

Clubs New Zealand supports gaming venues being able to relocate, and views this as a sensible policy provision.

### Club Gaming Proceeds

It is noted that the social impact assessment did not detail how the funds generated at club venues are used and how 100% of this money remains local, benefiting the very same people who play the machines. The data is publicly available via the Incorporated Societies website.

We ask that Council has regard to the benefit that comes from the gaming funding generated at club venues when reviewing the policy. We also strongly contest any assertion made that suggests clubs retain all gambling proceeds for the purposes of the club. This assertion gives the false impression that clubs can use gambling proceeds as they see fit. Clubs do have the unique ability to apply gambling proceeds, however, this must be done in line with the clubs approved authorised purpose statement.



In the year ended 31 December 2022, Club Buller had net proceeds of \$53,051 from the gaming machines located at its clubrooms and applied this money to authorised purposes that allow for the maintenance and upkeep of its clubrooms, security, staff training, and other non-bar-related operational costs.

Clubs exist for the betterment of their communities and the funds that are applied are critical to ensure these community assets remain open and operational.

### **Unique Provisions for Clubs?**

It is appropriate to have specific provisions for clubs in the policy as these provisions mirror the provisions in the Gambling Act 2003. Further, different provisions for club venues are appropriate because clubs provide a very safe and secure gaming environment.

The culture that exists in clubs is one of care and protection of the club's members. Clubs are a central community facility; they provide a social focal point, and a safe and secure venue in which members can enjoy food, gaming, sports, and alcohol.

Due to the club licence requirements, clubs are only permitted to allow access to members and guests of members who are accompanied by members. As a result, the people who frequent the club become well known to staff.

Staff quickly become aware of any member who shows problem gambling symptoms. Because the member is known personally by the staff and management it is easy to approach the person discreetly and enquire about the person's gambling and if appropriate, offer support or exclude the person from the gaming area. Members are less inclined to be defensive when such an approach is made in a club environment.

Clubs New Zealand is committed to helping our member clubs provide an environment where members and guests can enjoy themselves safely. All venues that operate gaming machines are legally required to have host responsibility and harm minimisation measures in place – clubs are no exception. Since 2001 Clubs New Zealand has delivered to its members the ClubCare Harm Minimisation Programme. ClubCare offers access to Harm Minimisation Training, resources, tools and templates.

The programme has evolved over the last 19 years and through consultation and support from the Department of Internal Affairs, Te Whatu Ora and the clubs themselves. Clubs New Zealand have recently invested heavily in producing club specific compliance manuals and reviewing our harm minimisation training offering to ensure that clubs will be continue to comply with new regulations introduced by the Gambling (Harm Prevention and Minimisation) Amendment Regulations 2023.

Our clubs are the communities they operate within. Making a positive contribution means being a responsible host and our clubs would not survive if they did not keep this top of mind.

### **Number of Machines and Venues in the District**

Clubs New Zealand is supportive of the council retaining the status quo for both the number of venues and the number of machines allowed in the district. The currently policy requires that each applicant be considered against defined criteria and that any decisions are to be made by full council following a hearing.

Clubs New Zealand believes that the status quo provides a robust process that ensures the views of the community are considered. Clubs New Zealand does not believe that arbitrary limits are the answer and that a considered approach is far for beneficial to the community.

### **Number of Gaming Machines allowed per Class 4 Gambling Venue**

Clubs New Zealand is supportive of the status quo. Clubs New Zealand believes it is important that any policies are consistent with the Gambling Act provisions and that this policy is currently working well.

### **Relocation**

Clubs New Zealand strongly recommends that the council adopt a policy that allows for relocations and recognises the need for venues to be able to relocate without the fear of losing their machines.

The Gambling (Gambling Harm Reduction) Amendment Act 2013 amended sections 101 and 102 of the Gambling Act 2003. The amendments introduced the ability for venues to relocate and retain up to 18 gaming machines.

There are many benefits to allowing for relocations:

- Venues can move out of unsuitable areas (non-gambling permitted areas such as residential areas) to more suitable areas (such as the CBD);
- Venues can re-establish after a natural disaster or fire;
- Venues can move out of earthquake-prone buildings;
- Venues can be re-established after loss of premises due to public works acquisition or lease termination;
- Venues can move if the landlord is demanding an above-market rental;
- Venues can move to new, modern, refurbished premises.

Allowing local businesses to upgrade their premises and provide a more modern, attractive offering helps to revitalise business districts, encourages tourism, and creates local employment. Not allowing relocation simply entrenches venues in old, unsuitable, and potentially earthquake-prone locations.

### Conclusion

Clubs New Zealand is supportive of the need to develop a balanced policy that reduces the risk of harm while at the same time being flexible enough to ensure that the return to community is maximised.

We do urge the council to note the funds generated within the club environment and how these are applied and or distributed by the club. There is a common misconception that club “retain all the profits from gambling activities”, when gambling funds are applied to club authorised purposes, it ensures that the club remains open and operational for its members and the wider community.

It is also appropriate for council to continue to allow venues to relocate. Allowing relocation enables venues to move out of residential areas, move out of earthquake-prone buildings, and to move to new, smaller, modern premises. Allowing relocation will enable venues to move from large blocks of land, which may be able to be used for more productive purposes.

Relocation provisions enables clubs and other business owners to restore their clubrooms/business after a fire, flood, earthquake or public works acquisition.



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**Submission for  
Buller District Council  
on the current review of the  
Class 4 Gambling Venues Policy**

**August 21, 2023**

## **New Zealand Community Trust's submission on Buller District Council's Gambling Venue Policy**

### **Introduction**

Established in 1998, New Zealand Community Trust (NZCT) is one of New Zealand's largest gaming trusts with 13% market share. Our publicans raise funds by operating gaming lounges within their pubs, hotels and other venues. In the 12 months to 30 September 2022, NZCT approved \$39.2 million distributed in grant funding to sporting, local government and community groups nationwide.

### **Gaming machine funding**

The Gambling Act 2003 seeks to balance the potential harm from gambling against the benefits of using gaming machines as a mechanism for community fundraising.

NZCT provided to Buller District Council for the direct benefit of the community from July 2020 to June 2023 a total of \$53,358 across 24 worthy grants. NZCT during the same period approved multi regional grants that benefit Buller District of \$8,333 and National Grants that benefit Buller District of \$3,117 - an overall total of \$64,809.

A list of all the grants made during this time are attached as appendix 1.

NZCT's contribution to community funding reflects its venue numbers and the turnover of each of those venues.

Maintaining the cap of machines across Buller District and the broad relocation policy will ensure these millions of dollars continue to be granted to the local community.

The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis, found that gambling in New Zealand had a net positive wellbeing benefit of between \$1,740 million and \$2,160 million each year.

New Zealand has a very low problem gambling rate by international standards – at 0.2% of people aged 18 and over (approximately 8000 people nationally). According to the New Zealand National Gambling Study: Wave 4 (2015).

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 an informed and balanced approach to community benefit and potential harm from gambling.

All gaming machine societies contribute to a problem gambling fund – which provides some \$20 million per year to the Ministry of Health to support and treat gambling addiction.

Problem gamblers are currently supported using a range of measures. The controlled, class 4 environment is the one of the best environments to reduce gambling harm to people and communities.

Information is freely available in the community to enable support and identify risks associated with gambling by members of the public, individuals at risk, staff at venues, and by loved ones.

Where a sinking lid is used it is a blunt instrument that does little to address problem gambling and reduces community funding by removing the fundraising infrastructure (i.e., gaming machines within tightly controlled entertainment venues) over time. Problem gambling is a complex addiction.

A cap on gaming machine numbers and an effective broader relocation policy to include where landlords are imposing unreasonable terms and that allows venues to move out of deprived areas is much fairer to the community and hospitality business owners, as well as helping address problem gambling.

If gaming venues are removed from the community, gamblers are more likely to move to the online environment where gambling is unregulated, unmonitored, and have no harm minimisation measures. Online gambling incentivises spending and returns nothing to benefit the New Zealand community. The controlled environment around class 4 is recognized as one of the safest places in which to enjoy gambling, whilst providing benefit back to the community.

In addition to contributing some \$1 million each year to the problem gambling levy, NZCT contributes an estimated \$800,000 each year, to resources and initiatives that help minimise harm.

Class 4 societies must distribute or apply 100% of profits to community authorised purposes. It's important to appreciate this a not-for-profit model.

## **It is recommended:**

- The current open policy with no cap be retained.
- A relocation provision be included using the following wording:

### ***Venue Relocation***

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

- *Where the venue is intended to replace an existing venue within the district;*
- *Where the existing venue operator consents to the relocation; and*
- *Where the proposed new location meets all the other requirements in this policy.*

*In accordance with section 97A, 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), when the new venue is established following a consent being granted under this relocation provision, the old venue is treated as if no gaming machine venue licence was ever held for the venue. The old venue will therefore require a Council consent before being relicensed to host gaming machines and will be limited to a maximum of 9 machines if such a consent is granted.*

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.

Venue relocation is a harm minimisation tool. Venue relocation allows venues to move out of a suburban/residential area to a more suitable area; the CBD. There is no good policy reason for taking steps to remove this option. Removing the option to relocate simply entrenches venues in undesirable residential locations.

Enabling relocation permits venues to re-establish after a natural disaster or fire as the current policy allows.

Enabling relocation enables venues to move out of earthquake-prone buildings, an important Health and Safety consideration.

The relocation policy is positive as it assists with the revitalisation of the area. 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.

#### **The national picture - 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, including councils accept grants and may depend on pub gaming grants to survive. It is crucial that this fundraising system is sustainable long term.

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.<sup>1</sup> 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.

#### **Locally in Buller District**

Buller District organisations like these that have benefited from NZCT's grants since July 2020 would miss out in the future if less funding is available.

<b>Organisation</b>	<b>Total Amount Approved</b>
Bowls Buller Inc	\$1,000.00
Buller Basketball Association Inc	\$3,000.00
Buller Basketball Association Inc	\$5,000.00
Buller Cricket Association Inc	\$2,953.52
Buller High School	\$2,000.00
Buller High School	\$4,000.00
Buller Hockey Association Inc	\$2,000.00
Buller Rugby Union Inc	\$4,000.00
Buller Rugby Union Inc	\$2,000.00
Buller Rugby Union Inc	\$2,000.00
Buller Sports Alliance Inc	\$5,000.00
Buller Sports Alliance Inc	\$5,000.00
Kawatiri Group Riding for the Disabled Inc	\$1,000.00
Ngakawau Rugby Football Club Inc	\$1,560.00

<sup>1</sup> Page iii, Community Funding Survey, Point Research 2012.

Reefton Golf Club Inc	\$2,000.00
Westport Golf Club Inc	\$5,000.00
Westport Golf Club Inc	\$2,000.00
Westport Old Boys Rugby Football Club Inc	\$1,920.00
White Star Rugby Football Club Inc	\$1,925.00
	<b>\$53,358.52</b>

While 90 cents of every dollar goes back to the person gambling, every year considerable funds are returned to the community by the non-club class 4 gambling sector. Refer 2020 grant distribution modelling by KPMG on behalf of DIA and industry, which analysed some \$294 million<sup>2</sup> of grants distributed to in 2019 to 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 already experienced a significant decline**

During the last 18 years the pub gaming sector has experienced a significant decline, yet problem gambling has remained static. Department of Internal Affairs (DIA) statistics show that, between 30 June 2003 and 31 December 2022:

- the number of gaming venues reduced from 2,122 to 1,028 (a 50% reduction)<sup>3</sup>
- the number of gaming machines operating reduced from 25,221 to 14,503 (a 41.7% reduction)<sup>4</sup>.

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

Sometimes the policies are based on the erroneous belief that limiting and or reducing gaming machine numbers will limit problem gambling. In fact, despite the 41% reduction in gaming machine numbers during the past 17 years, New Zealand's problem gambling rate has remained consistently low as a percentage 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."<sup>5</sup>

#### **Online gambling is the unregulated threat to watch out for**

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.

<sup>2</sup> *Grant Distribution Modelling*, KPMG, November 2020.

<sup>3</sup> DIA statistics: [https://www.dia.govt.nz/diawebsite.nsf/wpg\\_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict](https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict)

<sup>4</sup> Ibid.

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

During the Covid-19 lockdown in 2020, 8% of gamblers gambled online for the first time and an additional 12% gambled online more than usual.<sup>6</sup>

Offshore-based online gambling poses considerable risks because it:

- Is highly accessible, and is available 24 hours a day from the 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 this online channel;
- Provides no guaranteed return to the person playing;
- Is more easily abused by under 18s;
- Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and is unregulated, so on-line gamblers can be 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 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<sup>6b</sup>.

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

Research<sup>7</sup> 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 Act<sup>8</sup> 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 town planning.

#### **Helping reduce harm**

Research<sup>9</sup> 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".<sup>10</sup> The Ministry of Health also found "being a problem gambler is significantly associated with living closer to gambling venues."<sup>11</sup> Allowing gaming operations to move out of high-deprivation areas could potentially diminish gambling harm for at-risk communities.

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

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

<sup>8</sup> Section 97A and 102(5A).

<sup>6b</sup> [http://www.gamblinglaw.co.nz/download/Online\\_gambling\\_Cabinet\\_paper.pdf](http://www.gamblinglaw.co.nz/download/Online_gambling_Cabinet_paper.pdf)

<sup>9</sup> *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*, Gambling & Addictions Research Centre, AUT University, 2012.

<sup>10</sup> Page 21, *Ministry of Health Gambling Resource for Local Government*, 2013.

<sup>11</sup> *Ibid.*



### 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.<sup>12</sup>

### 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.

### 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.

### NZCT's revenue distribution in 2021/22



<sup>12</sup> Internal Affairs Policy Briefing 3: Options for improving territorial authority gaming machine policies, 28 March 2013.

In the year ending 30 September 2022, NZCT distributed \$39.2 million through 1,442 grants.

NZCT provided to Buller District Council for the direct benefit of the community from July 2020 to June 2023 a total of **\$53,358** across 24 worthy grants.

NZCT during the same period approved multi regional grants that benefit Buller District of **\$8,333** and National Grants that benefit Buller District of **\$3,117** - an overall total of **\$64,809**. (See appendix 1 for details).

Amateur sport has traditionally been our focus, yet we fund education, arts and health also. Between 75 and 80% of the grants we distribute go to sports organisations. Each year, NZCT funds around 50 different sports.

In 2021/22, 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.

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.<sup>13</sup> 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 circa \$18 to \$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.

### **Reasons to maintain the relocation policy on gaming machines and venues**

Gaming machines are an important component of your local hospitality sector and an important source of community funding, and the benefits are considerable.

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<sup>13</sup> *Grant Distribution Modelling*, KPMG, November 2020.

### 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.

### The benefits are considerable

Recent research in 2021 carried out independently by TBD who produced the TBD Advisory report, Gambling in New Zealand: A National Wellbeing Analysis<sup>8</sup>, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.7 to \$2.1 billion per annum. The costs and benefits are summarised in table, which can be found on page 87 of the report (replicated below)<sup>7b</sup>

**Table 32: Quantifiable costs and benefits of gambling in New Zealand, p.a., \$ million,**

	Gross benefits	Costs	Net benefits
Consumption-side	2,740 to 3,160	2,090	650 to 1,070
Production-side	1,800	990	810
Government	280	-	280
<b>Total</b>	<b>4,820 to 5,240</b>	<b>3,080</b>	<b>1,740 to 2,160</b>

The report for the first time reliably indicates benefits, as well as costs and shows that this net benefit is provided each year throughout New Zealand.

### 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. Evidence show that problem gambling rates have plateaued.

### Gaming machines are a legal and valid entertainment choice

Pub gaming is a legal, valid, and enjoyable source of entertainment for Hutt 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."<sup>14</sup>

We recognise that Buller District Council aims, to balance the needs of visitors and residents while achieving a focus on wellbeing and economic development. If appropriate measures remain in place

<sup>14</sup> Gambling Commission decision GC 03/07

to support problem gambling, then funding structure should remain in the community for the good it will bring.

Pub gaming brings many benefits to New Zealand. Business and Economic Research Ltd (BERL)<sup>15</sup> 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.<sup>16</sup> 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."<sup>17</sup>

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"

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.<sup>18</sup>

#### **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, New Zealand has one of the lowest rates of problem gambling in the world.<sup>19</sup> Relatively few New Zealanders are gambling at levels that lead to negative consequences; most people who gamble know when to stop.

Country	Problem gambling prevalence (% population*)
New Zealand	0.1–0.2
UK	0.7
Norway	0.7
Australia	2.3
USA	2.6
Canada	3
Mixture of CPGI, PGSI and SOGS scores <sup>20</sup>	

<sup>15</sup> *Maximising the benefits to communities from New Zealand's Community Gaming Model*, BERL, February 2013.

<sup>16</sup> Pg 8, *NZ 2012 National Gambling Study: Overview and gambling participation*.

<sup>17</sup> Pg 18, *ibid*.

<sup>18</sup> DIA media release: <http://livenews.co.nz/2017/04/21/new-zealand-gaming-pokie-spending-patterns-continue/>

<sup>19</sup> *Maximising the benefits to communities from New Zealand's community gaming model*, BERL, February 2013.

<sup>20</sup> 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.



### 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:

- 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.
- stake and prize money are limited
- odds of winning are displayed
- gaming rooms are restricted to people over the age of 18 years
- gaming rooms can only be operated in adult environments, like 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

### Ongoing obligations

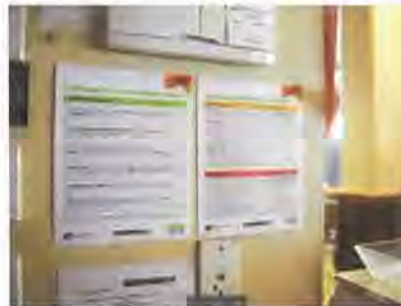
The Gambling Act obliges venue staff to provide ongoing help to a potential or current problem gambler. Offering help once, and then ignoring continued warning signs, is not sufficient.

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 circa \$18 - 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.

### 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.

In addition to this toolkit, increasingly facial recognition technology is used to identify problem gamblers and assist them to be excluded. NZCT has strongly recommended to the Ministry of Health on the proposed Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25 that this technology be rolled out further as part of problem gambling harm minimisation work underway.



#### The Guardian - Facial Recognition System

A fully integrated, market-leading system that identifies excluded persons as they enter a gaming room, by matching them against a centralised database.

Three short videos showing how the facial recognition system works can be viewed at:

<https://www.coms.net.nz/the-guardian-facial-recognition/>

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.



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.<sup>21</sup> The world's largest clinical trial<sup>22</sup> for problem gambling treatment found that, one year after calling the Gambling Helpline, three-quarters of callers had quit or significantly reduced their gambling.

<sup>21</sup> Page 16, *Outcomes Framework for Preventing and Minimising Gambling Harm Baseline Report*, May 2013.

<sup>22</sup> *The Effectiveness of Problem Gambling Brief Telephone Interventions*, AUT, Gambling & Addictions Research Centre.



## About NZCT

Established in 1998, New Zealand Community Trust (NZCT) is the one of the largest gaming trusts with 13% market share, operating in venues and communities throughout New Zealand. In the 12 months to 30 September 2022, NZCT approved \$39.2 million in grant funding to sporting, local government, education, the arts, health, and community groups nationwide.

NZCT's Board and management take risk mitigation and assurance seriously and our risk framework recognises the need for effective controls and mitigation tools/strategies to prevent and minimise harm from problem gambling.

While most New Zealanders gamble without experiencing any harm, a small minority who participate suffer some degree of harm and the impacts for them and people affected by their gambling, can be significant.

NZCT contributes through the problem gambling levy approximately \$1 million per annum to the collective annual levy of \$18-20 million. That is a significant amount, on top of an estimated \$800,000 which NZCT expends within the organisation each year, on training, resourcing, and technology, such as facial recognition technology (FRT), directed to identifying and mitigating problem gambling in our venues. We have a strong interest in seeing the levy spent effectively.



Over the last 10 years, the Ministry of Health has received more than \$186 million in funding from the four gambling sectors that contribute to the annual levy.

In that period, it appears the problem gambling rate has not reduced, and the key objectives of the strategy have not been met, as confirmed by the damning Needs Assessment Report.

We have twin goals of serving both our publicans and the communities in which they operate. At least 75% to 80% of the funds we currently 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.<sup>23</sup>

Overseas research<sup>24</sup> has found participation in sport can lead to increased health and productivity for individuals, and increased wealth or wellbeing of society. While amateur sport is our main focus, we are also strong supporters of other worthy community activities, including local government projects.

<sup>23</sup> Sport England's Value of Sport Monitor.

<sup>24</sup> [http://www.ausport.gov.au/information/asc\\_research/publications/value\\_of\\_sport](http://www.ausport.gov.au/information/asc_research/publications/value_of_sport).

## Further information about our Submission information

For further information, or if you have any questions about NZCT's information, contact Don Martin, Communications and Marketing Manager on [REDACTED]

## Meet our Regional Advisor

**Paul Matheson**

Funding Advisor, Top of the South

<https://www.nzct.org.nz/about-us/meet-our-regional-advisory-committees/>

## Our Trustees

**Alan Isaac**

Board Chair

**David Pilkington**

Board Member and Net Proceeds Committee Chair

**Dame Kerry Prendergast**

Board Member and Audit and Risk Committee Chair

**Lesley Murdoch**

Board Member

**Peter Miskimmin**

Board Member

<https://www.nzct.org.nz/about-us/#meet-our-trustees>

# Appendix 1

## Grants to Buller District by NZCT

**July 2020 to June 2023**

## Grants to Buller District - July 2020 to June 2023

Grant #	Organisation	Total Amount Approved	Amount drawn from Buller District	Date of Approval Purpose
90614	Bowls Buller Inc	\$1,000.00	\$1,000.00	14/12/2021 Accommodation
87594	Buller Basketball Association Inc	\$3,000.00	\$3,000.00	22/06/2021 Travel and accommodation
92325	Buller Basketball Association Inc	\$5,000.00	\$5,000.00	19/04/2022 Stadium hire
96105	Buller Cricket Association Inc	\$2,953.52	\$2,953.52	3/11/2022 Cricket balls
87654	Buller High School	\$2,000.00	\$2,000.00	22/06/2021 Travel and accommodation
93116	Buller Hockey Association Inc	\$4,000.00	\$4,000.00	28/06/2023 Travel and Accommodation
87699	Buller Hockey Association Inc	\$2,000.00	\$2,000.00	22/06/2021 Travel and accommodation
86487	Buller Rugby Union Inc	\$4,000.00	\$4,000.00	20/04/2021 Salary
92462	Buller Rugby Union Inc	\$2,000.00	\$2,000.00	17/05/2022 Salary
98821	Buller Rugby Union Inc	\$2,000.00	\$2,000.00	17/05/2023 Playing uniforms
83272	Buller Sports Alliance Inc	\$5,000.00	\$5,000.00	22/09/2020 Salary
87797	Buller Sports Alliance Inc	\$5,000.00	\$5,000.00	22/07/2021 Salary
90729	Kawatiri Group Riding for the Disabled Inc	\$1,000.00	\$1,000.00	18/01/2022 Salary
86359	Ngakawau Rugby Football Club Inc	\$1,560.00	\$1,560.00	22/03/2021 Travel
89069	Reefton Golf Club Inc	\$2,000.00	\$2,000.00	21/09/2021 Course maintenance products
83811	Westport Golf Club Inc	\$5,000.00	\$5,000.00	22/09/2020 Fungicide and fertilisers
97523	Westport Golf Club Inc	\$2,000.00	\$2,000.00	1/03/2023 Fertilisers and fungicides
85650	Westport Old Boys Rugby Football Club Inc	\$1,920.00	\$1,920.00	19/01/2021 Travel
87108	White Star Rugby Football Club Inc	\$1,925.00	\$1,925.00	22/06/2021 Playing uniforms
		<b>\$53,358.52</b>	<b>\$53,358.52</b>	
<b>Regional grants that benefit Buller District</b>				
97265	Buller Gorge Marathon Trust Board	\$2,000.00	\$300.00	31/01/2023 Marquee (excludes deposit, mileage, accommodation, meals)
97983	Buller Gorge Marathon Trust Board	\$2,038.75	\$61.16	21/06/2022 First aid cover
86934	Canterbury West Coast Sports Trust	\$130,000.00	\$685.96	18/05/2021 Salaries of Events Assistant and Top Team Coordinator, Regional Manager West Coast, Regional Manager Mid Canterbury, Community Coach Advisor and Sport Development Advisor
92458	Canterbury West Coast Sports Trust	\$130,000.00	\$97.43	17/05/2022 Salaries of Sport Development Advisor, Community Coach Advisor, Regional Manager Mid Canterbury, Regional Manager West Coast, Regional Sport Coordinator and Office Administrator and General Manager Participation Pathways
97947	Canterbury West Coast Sports Trust	\$180,000.00	\$849.46	19/04/2023 Salaries of General Manager Participation Pathways, Regional Play Systems Lead, Rangatahi Lead, Regional Sports Coordinator and Office Administrator, South Canterbury Regional Manager, Mid Canterbury Regional Manager, West Coast Regional Manager, Community Coach Advisor and Sector Support Manager
91875	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$96,675.00	\$19.07	22/03/2022 Travel costs for 2022 National Youth Development League (on behalf of all football federations)
93131	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$112,000.00	\$12.43	19/07/2022 Travel and accommodation for 2022 Futsal Youth Championships (on behalf of all football federations)
87364	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$140,000.00	\$94.88	22/06/2021 Accommodation and flights for 2021 National Age Group Tournament (on behalf of all football federations)
91832	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$175,000.00	\$159.94	20/06/2023 Travel and accommodation for 2023 National Youth Development League (on behalf of all football federations)
86502	Christchurch Schools Music Festival Association Inc	\$8,000.00	\$39.34	20/04/2021 Venue hire

Grant #	Organisation	Total Amount Approved	Amount drawn from Buller District	Date of Approval	Purpose
94969	Christchurch Schools Music Festival Association Inc	\$8,000.00	\$3.61	20/09/2022	Lighting
97864	Christchurch Schools Music Festival Association Inc	\$10,000.00	\$47.19	19/04/2023	Venue hire
98690	Mainland Badminton Inc	\$3,000.00	\$10.53	17/05/2023	Van Hire
97110	ME/CFS Group Canterbury Inc	\$5,000.00	\$23.64	31/01/2023	Salary
99178	ME/CFS Group Canterbury Inc	\$6,185.84	\$141.12	14/06/2023	Salary
83018	No 6 District Federation of NZ Football Inc	\$75,000.00	\$345.00	6/08/2020	Salaries of Director of Football, Football Development Officer, Referee Development Officer, Competitions Manager, Womens Development Officer and Futsal Development Manager
86626	Mainland Football	\$179,615.38	\$737.12	22/06/2021	Salaries of Federation Player Development Manager, Operations and Administration Manager Nelson Bays, Director of Football, Referee Development Officer, Womens Development Officer, Futsal Development Officer and Competitions Manager; FC Nelson Director of Football and Nelson Suburbs Director of Football contract fees
93082	No 6 District Federation of NZ Football Inc	\$180,000.00	\$143.89	19/07/2022	Salaries of Operations and Administration Manager Nelson Bays, Community Development Officer, Referee Development Officer, Coach and Leadership Manager, Player Development Manager, Girls and Womens Development Officer, Futsal Development Manager and Competitions Manager - excludes expenses
93031	South Island Masters Games Timaru Inc	\$20,000.00	\$15.53	21/06/2022	Contractor
98828	South Island Rowing Inc	\$30,000.00	\$79.97	20/06/2023	Salary
82958	Southern Zone of NZRL Inc	\$60,000.00	\$276.00	6/08/2020	Salaries of Club Capability and Events Manager, Canterbury Rugby League Development Officer and General Manager
97694	Southern Zone of NZRL Inc	\$118,269.23	\$415.14	19/04/2023	Salaries of Club Capability and Event Manager and Southern Zone General Manager; Canterbury Rugby League Director of Football contract fee
86219	Southern Zone of NZRL Inc	\$120,000.00	\$478.19	22/03/2021	Salaries of Club Capability and Events Manager and General Manager; Canterbury Rugby League Development Officer contract fee
91946	Southern Zone of NZRL Inc	\$120,000.00	\$116.53	22/03/2022	Salaries of Club Capability and Events Manager and General Manager; Canterbury Rugby League Development Officer contract fee
83915	Squash Canterbury Inc	\$26,000.00	\$110.77	20/04/2021	Salary
83175	Swimming Canterbury West Coast Inc	\$30,000.00	\$138.00	6/08/2020	Salary
88931	Swimming Canterbury West Coast Inc	\$30,000.00	\$128.14	21/09/2021	Salary
94896	Swimming Canterbury West Coast Inc	\$30,000.00	\$13.54	20/09/2022	Salary
83589	Touch Canterbury Inc	\$25,000.00	\$143.75	22/09/2020	Salary
95108	Touch Canterbury Inc	\$50,000.00	\$22.56	20/09/2022	Salaries of Administration, Junior Module & Representative Officer and Regional Development Manager
86992	West Coast Badminton Association Inc	\$572.00	\$97.24	18/05/2021	Court hire
91756	West Coast Badminton Association Inc	\$648.00	\$32.40	19/04/2022	Court hire
98656	West Coast Badminton Association Inc	\$1,015.00	\$152.25	17/05/2023	Venue Hire
94060	West Coast Cricket Association Inc	\$10,000.00	\$400.00	23/08/2022	Contractor
85773	West Coast Riding for the Disabled Inc	\$15,000.00	\$1,800.00	19/01/2021	Roof insulation and installation
96673	Young Mens Christian Association of Christchurch Inc Charitable Trust	\$30,000.00	\$141.58	21/03/2023	Salary
		<b>\$2,159,019.20</b>	<b>\$8,333.36</b>		

Grants to National organisations that benefit Buller District

Grant #	Organisation	Total Amount Approved	Amount drawn from Buller District	Date of Approval	Purpose
95836	Golf NZ Korowha Aotearoa Inc	\$150,000.00	\$206.00	21/11/2022	Salaries of Club Capability Manager - Canterbury, Regional Performance Golf Coordinator, Regional Golf Club Capability Officer - Bay of Plenty and Young People Participation Manager Auckland
84535	Golf NZ Korowha Aotearoa Inc	\$150,000.00	\$64.78	17/11/2020	Salaries of Regional Support Managers for Northern, Waikato/ROP, Lower North Island and South Island
83157	Gymsports NZ Inc	\$100,000.00	\$92.00	6/08/2020	Salaries of Community Sport Manager, National Support Administrator, Relationship Team Manager, Midlands Relationship Manager, Central Relationship Manager and Southern Relationship Manager
91548	Gymsports NZ Inc	\$180,000.00	\$60.00	22/03/2022	Salaries of Community Sport Manager, South Relationship Manager, Central Relationship Manager and Midlands Relationship Manager
86503	Gymsports NZ Inc	\$189,101.92	\$195.25	22/03/2021	Salaries of Operations Manager, Community Sport Manager, National Support Administrator, Midlands Relationship Manager, Central Relationship Manager and Southern Relationship Manager
97579	Gymsports NZ Inc	\$190,000.00	\$163.17	15/05/2023	Vehicle Lease; Salaries of Community Sport Manager, Upper South Relationship Manager, Central Region Relationship Manager, Midlands Region Relationship Manager and Auckland/North Region Relationship Manager
89266	Halberg Foundation	\$120,000.00	\$64.34	21/09/2021	Salaries of regional Disability Sport Advisors and Lead Advisors
94861	Halberg Foundation	\$120,000.00	\$7.46	20/09/2022	Salaries of regional Disability Sport Advisors and Lead Advisors
97383	Netball NZ Inc	\$205,000.00	\$616.19	21/03/2023	Office workstation rental; Vehicle leases; Salaries of Development Coach, Participation Lead, Community Coaching Lead and Netball Relationship Manager
85435	Netball NZ Inc	\$205,000.00	\$587.63	15/12/2020	Office space rental (excluding furniture allowance); Vehicle leases; Salaries of Performance Coach - Mainland, Participation Lead - Mainland, Community Trainer-Umpire and Coach Mainland and Netball Relationship Manager
91156	Netball NZ Inc	\$205,000.00	\$319.35	18/01/2022	Office rental; Vehicle leases; Salary - Development Coach - excludes allowances; Salary - Participation Lead - excludes allowances; Salary - Community Trainer - Coach and Umpire - excludes allowances; Salary - Netball Relationship Manager - excludes allowances
88504	Scout Association of NZ	\$50,000.00	\$35.04	2/09/2021	Salaries of General Manager South Island, General Manager Lower North Island and General Manager Upper North Island
94422	Scout Association of NZ	\$75,000.00	\$3.73	23/08/2022	Salaries of General Manager South Island, General Manager Lower North Island and General Manager Upper North Island
92933	Special Olympics NZ	\$235,800.00	\$22.38	21/06/2022	Salaries of Regional Sports Coordinators and Sports Director
85902	Special Olympics NZ	\$250,000.00	\$80.26	23/02/2021	Salaries of Regional Sports Coordinators
98502	Special Olympics NZ	\$270,000.00	\$155.42	20/06/2023	Salaries of Sports Director and Regional Sports Coordinators
93090	Surf Life Saving NZ Inc	\$55,000.00	\$11.65	21/06/2022	Salaries of Sport Manager Central, Sport Manager Southern and Sport Manager Eastern
97391	Surf Life Saving NZ Inc	\$60,000.00	\$70.34	21/03/2023	Salaries of Sport Manager Central, Sport Manager Southern and Sport Manager Eastern
98895	Talk Link Trust	\$21,695.65	\$57.83	20/06/2023	Purchase of a vehicle
98139	Volleyball NZ Inc	\$100,000.00	\$73.04	15/05/2023	Travel and Accommodation
96774	Yachting NZ Inc	\$145,000.00	\$127.25	17/01/2023	Salaries of Regional Development Manager - Bay of Plenty, Regional Development Manager - Central, Regional Development Manager - Southern and Regional Development Manager - Northern
91127	Yachting NZ Inc	\$145,000.00	\$25.49	21/02/2022	Salaries of Regional Development Manager - Bay of Plenty, Regional Development Manager - Canterbury, Regional Development Manager - Northern
85826	Yachting NZ Inc	\$152,000.00	\$78.77	23/02/2021	Salaries of Regional Support Officers for Auckland, Northland, Central including Bay of Plenty and Gisborne, West Coast, Canterbury, Otago and Southland
		\$3,373,597.57	\$3,117.37		
		\$5,585,975.29	\$64,809.25		

## Grants to Buller District - July 2020 to June 2023

Grant #	Organisation	Total Amount Approved	Date of Approval	Purpose
90614	Bowls Buller Inc	\$1,000.00	14/12/2021	Accommodation
87594	Buller Basketball Association Inc	\$3,000.00	22/06/2021	Travel and accommodation
92325	Buller Basketball Association Inc	\$5,000.00	19/04/2022	Stadium hire
96105	Buller Cricket Association Inc	\$2,953.52	3/11/2022	Cricket balls
87654	Buller High School	\$2,000.00	22/06/2021	Travel and accommodation
99316	Buller High School	\$4,000.00	28/06/2023	Travel and Accommodation
87699	Buller Hockey Association Inc	\$2,000.00	22/06/2021	Travel and accommodation
86487	Buller Rugby Union Inc	\$4,000.00	20/04/2021	Salary
92462	Buller Rugby Union Inc	\$2,000.00	17/05/2022	Salary
98821	Buller Rugby Union Inc	\$2,000.00	17/05/2023	Playing uniforms
83272	Buller Sports Alliance Inc	\$5,000.00	22/09/2020	Salary
87797	Buller Sports Alliance Inc	\$5,000.00	22/07/2021	Salary
90729	Kawatiri Group Riding for the Disabled Inc	\$1,000.00	18/01/2022	Salary
86359	Ngakawau Rugby Football Club Inc	\$1,560.00	22/03/2021	Travel
89069	Reefton Golf Club Inc	\$2,000.00	21/09/2021	Course maintenance products
83811	Westport Golf Club Inc	\$5,000.00	22/09/2020	Fungicide and fertilisers
97523	Westport Golf Club Inc	\$2,000.00	1/03/2023	Fertilisers and fungicides
85650	Westport Old Boys Rugby Football Club Inc	\$1,920.00	19/01/2021	Travel
87108	White Star Rugby Football Club Inc	\$1,925.00	22/06/2021	Playing uniforms
		<u>\$53,358.52</u>		
<b>Regional grants that benefit Buller District</b>				
97265	Buller Gorge Marathon Trust Board	\$300.00	31/01/2023	Marquees (excludes deposit, mileage, accommodation, meals)
92983	Buller Gorge Marathon Trust Board	\$61.16	21/06/2022	First aid cover
86934	Canterbury West Coast Sports Trust	\$685.96	18/05/2021	Salaries of Events Assistant and Top Team Coordinator, Regional Manager West Coast, Regional Manager Mid Canterbury, Community Coach Advisor and Sport Development Advisor
92458	Canterbury West Coast Sports Trust	\$97.43	17/05/2022	Salaries of Sport Development Advisor, Community Coach Advisor, Regional Manager Mid Canterbury, Regional Manager West Coast, Regional Sport Coordinator and Office Administrator and General Manager Participation Pathways
97947	Canterbury West Coast Sports Trust	\$849.46	19/04/2023	Salaries of General Manager Participation Pathways, Regional Play Systems Lead, Rangatahi Lead, Regional Sports Coordinator and Office Administrator, South Canterbury Regional Manager, Mid Canterbury Regional Manager, West Coast Regional Manager, Community Coach Advisor and Sector Support Manager
91875	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$19.07	22/03/2022	Travel costs for 2022 National Youth Development League (on behalf of all football federations)
93131	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$12.43	19/07/2022	Travel and accommodation for 2022 Futsal Youth Championships (on behalf of all football federations)
87364	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$94.88	22/06/2021	Accommodation and flights for 2021 National Age Group Tournament (on behalf of all football federations)



Grant #	Organisation	Total Amount Approved	Date of Approval	Purpose
91832	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$159.94	20/06/2023	Travel and accommodation for 2023 National Youth Development League (on behalf of all football federations)
86502	Christchurch Schools Music Festival Association Inc	\$39.34	20/04/2021	Venue hire
94969	Christchurch Schools Music Festival Association Inc	\$3.61	20/09/2022	Lighting
97864	Christchurch Schools Music Festival Association Inc	\$47.19	19/04/2023	Venue hire
98690	Mainland Badminton Inc	\$10.53	17/05/2023	Van Hire
97110	ME/CFS Group Canterbury Inc	\$23.64	31/01/2023	Salary
99178	ME/CFS Group Canterbury Inc	\$141.12	14/06/2023	Salary
83018	No 6 District Federation of NZ Football Inc - Mainland Football	\$345.00	6/08/2020	Salaries of Director of Football, Football Development Officer, Referee Development Officer, Competitions Manager, Womens Development Officer and Futsal Development Manager
86626	No 6 District Federation of NZ Football Inc - Mainland Football	\$737.12	22/06/2021	Salaries of Federation Player Development Manager, Operations and Administration Manager Nelson Bays, Director of Football, Referee Development Officer, Womens Development Officer, Futsal Development Officer and Competitions Manager; FC Nelson Director of Football and Nelson Suburbs Director of Football contract fees
93082	No 6 District Federation of NZ Football Inc - Mainland Football	\$143.89	19/07/2022	Salaries of Operations and Administration Manager Nelson Bays, Community Development Officer, Referee Development Officer, Coach and Leadership Manager, Player Development Manager, Girls and Womens Development Officer, Futsal Development Manager and Competitions Manager - excludes expenses
93031	South Island Masters Games Timaru Inc	\$15.53	21/06/2022	Contractor
98828	South Island Rowing Inc	\$79.97	20/06/2023	Salary
82958	Southern Zone of NZRL Inc	\$276.00	6/08/2020	Salaries of Club Capability and Events Manager, Canterbury Rugby League Development Officer and General Manager
97694	Southern Zone of NZRL Inc	\$415.14	19/04/2023	Salaries of Club Capability and Event Manager and Southern Zone General Manager; Canterbury Rugby League Director of Football contract fee
86219	Southern Zone of NZRL Inc	\$478.19	22/03/2021	Salaries of Club Capability and Events Manager and General Manager; Canterbury Rugby League Development Officer contract fee
91946	Southern Zone of NZRL Inc	\$116.53	22/03/2022	Salaries of Club Capability and Events Manager and General Manager; Canterbury Rugby League Development Officer contract fee
85915	Squash Canterbury Inc	\$110.77	20/04/2021	Salary
83175	Swimming Canterbury West Coast Inc	\$138.00	6/08/2020	Salary
88931	Swimming Canterbury West Coast Inc	\$128.14	21/09/2021	Salary
94896	Swimming Canterbury West Coast Inc	\$13.54	20/09/2022	Salary
83589	Touch Canterbury Inc	\$143.75	22/09/2020	Salary
95108	Touch Canterbury Inc	\$22.56	20/09/2022	Salaries of Administration, Junior Module & Representative Officer and Regional Development Manager
86992	West Coast Badminton Association Inc	\$97.24	18/05/2021	Court hire
91756	West Coast Badminton Association Inc	\$32.40	19/04/2022	Court hire

Grant #	Organisation	Total Amount Approved	Date of Approval	Purpose
98656	West Coast Badminton Association Inc	\$152.25	17/05/2023	Venue Hire
94060	West Coast Cricket Association Inc	\$400.00	23/08/2022	Contractor
85773	West Coast Riding for the Disabled Inc	\$1,800.00	19/01/2021	Roof insulation and installation
96673	Young Mens Christian Association of Christchurch Inc Charitable Trust	\$141.58	21/03/2023	Salary
		<u>\$8,333.36</u>		
<b>Grants to National organisations that benefit Buller District</b>				
95836	Golf NZ Korowha Aotearoa Inc	\$206.00	21/11/2022	Salaries of Club Capability Manager - Canterbury, Regional Performance Golf Coordinator, Regional Golf Club Capability Officer - Bay of Plenty and Young People Participation Manager Auckland
84535	Golf NZ Korowha Aotearoa Inc	\$64.78	17/11/2020	Salaries of Regional Support Managers for Northern, Waikato/BOP, Lower North Island and South Island
83157	Gymsports NZ Inc	\$92.00	6/08/2020	Salaries of Community Sport Manager, National Support Administrator, Relationship Team Manager, Midlands Relationship Manager, Central Relationship Manager and Southern Relationship Manager
91548	Gymsports NZ Inc	\$60.00	22/03/2022	Salaries of Community Sport Manager, South Relationship Manager, Central Relationship Manager and Midlands Relationship Manager
86503	Gymsports NZ Inc	\$195.25	22/03/2021	Salaries of Operations Manager, Community Sport Manager, National Support Administrator, Midlands Relationship Manager, Central Relationship Manager and Southern Relationship Manager
97579	Gymsports NZ Inc	\$163.17	15/05/2023	Vehicle Lease; Salaries of Community Sport Manager, Upper South Relationship Manager, Central Region Relationship Manager, Midlands Region Relationship Manager and Auckland/North Region Relationship Manager
89266	Halberg Foundation	\$64.34	21/09/2021	Salaries of regional Disability Sport Advisors and Lead Advisors
94861	Halberg Foundation	\$7.46	20/09/2022	Salaries of regional Disability Sport Advisors and Lead Advisors
97383	Netball NZ Inc	\$616.19	21/03/2023	Office workstation rental; Vehicle leases; Salaries of Development Coach, Participation Lead, Community Coaching Lead and Netball Relationship Manager
85435	Netball NZ Inc	\$587.63	15/12/2020	Office space rental (excluding furniture allowance); Vehicle leases; Salaries of Performance Coach - Mainland, Participation Lead - Mainland, Community Trainer-Umpire and Coach Mainland and Netball Relationship Manager
91156	Netball NZ Inc	\$319.35	18/01/2022	Office rental; Vehicle leases; Salary - Development Coach - excludes allowances; Salary - Participation Lead - excludes allowances; Salary - Community Trainer - Coach and Umpire - excludes allowances; Salary - Netball Relationship Manager - excludes allowances
88504	Scout Association of NZ	\$35.04	2/09/2021	Salaries of General Manager South Island, General Manager Lower North Island and General Manager Upper North Island
94422	Scout Association of NZ	\$3.73	23/08/2022	Salaries of General Manager South Island, General Manager Lower North Island and General Manager Upper North Island
92933	Special Olympics NZ	\$22.38	21/06/2022	Salaries of Regional Sports Coordinators and Sports Director
85902	Special Olympics NZ	\$80.26	23/02/2021	Salaries of Regional Sports Coordinators
98502	Special Olympics NZ	\$155.42	20/06/2022	Salaries of Sports Director and Regional Sports Coordinators
93090	Surf Life Saving NZ Inc	\$11.65	21/06/2022	Salaries of Sport Manager Central, Sport Manager Southern and Sport Manager Eastern
97391	Surf Life Saving NZ Inc	\$70.34	21/03/2023	Salaries of Sport Manager Central, Sport Manager Southern and Sport Manager Eastern
98895	Talk Link Trust	\$57.83	20/06/2023	Purchase of a vehicle

Grant #	Organisation	Total Amount Approved	Date of Approval	Purpose
98139	Volleyball NZ Inc	\$73.04	15/05/2023	Travel and Accommodation
96774	Yachting NZ Inc	\$127.25	17/01/2023	Salaries of Regional Development Manager - Bay of Plenty, Regional Development Manager - Central, Regional Development Manager - Southern and Regional Development Manager - Northern
91127	Yachting NZ Inc	\$25.49	21/02/2022	Salaries of Regional Development Manager - Bay of Plenty, Regional Development Manager - Canterbury, Regional Development Manager - Central and Regional Development Manager - Northern
85826	Yachting NZ Inc	\$78.77	23/02/2021	Salaries of Regional Support Officers for Auckland, Northland, Central including Bay of Plenty and Gisborne, West Coast, Canterbury, Otago and Southland
		\$3,117.37		
		\$64,809.25		



Te Ope Whakaora

# Oasis

Reducing Gambling Harm

## The Salvation Army Oasis – Christchurch

Submission to

**Buller District Council**

on the

### **Review of Buller District Council Class 4 Gambling and TAB venue policy**

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

#### **Please contact**

Nicky Taylor  
Public Health Promoter



## 1 BACKGROUND

- 1.1 The Salvation Army is an international faith-based social services organisation that has worked in Aotearoa New Zealand for over one hundred and thirty years. The Army provides a wide range of social, community and faith-based services, particularly for those who are marginalised by mainstream society.
- 1.2 The Salvation Army Oasis was formally established in June 1997 in Auckland, in response to growing evidence that the influx of gambling opportunities was having a negative social impact on society. The numbers of clients seeking help for gambling-related harm have increased dramatically. The Salvation Army Oasis gambling harm services have expanded to seven regions with satellite clinics across the country. We are funded by Te Whatu Ora to provide gambling harm related clinical and public health services.
- 1.3 The Salvation Army Oasis is a well-established specialist service that has worked towards reducing petipeti whakamaru (gambling harm) in Aotearoa New Zealand for over 25 years. Our free and confidential service is delivered by a team of qualified and diverse health professionals, who utilise evidence-based approaches, to support and empower individuals, whanau, and communities to develop healthy and fulfilling lifestyles and communities, free from gambling harm.

Our Public Health team use a wide population approach, working with communities, health and social services, the gambling industry and government departments to promote positive social and systemic change to prevent and reduce gambling harm and associated inequities. This includes influencing change at a national and local level.

The wrap-around support offered by The Salvation Army Oasis includes support from those who have lived experience of overcoming adversity and gambling harm in their lives. This team are passionate about improving the services that Oasis have to offer.

We are also supported by our regional Pou Ārahi / Māori Health & Wellbeing Advisors. They provide cultural leadership to support the development of Tiriti-based policies and practices focussed on the wellbeing and flourishing of tangata whenua, and provide tikanga Māori support to Oasis, alongside developing relationships with iwi/hapū/marae/Māori organisations of the region.

- 1.4 This submission has been prepared by The Salvation Army Oasis Christchurch.

## 2 GAMBLING HARM

- 2.1 **Salvation Army Oasis engagement with gambling policy:** We have persistently engaged with government around gambling-related harm. We contend that one of the key purposes of the Gambling Act 2003, to prevent and minimise harm from gambling (section 3(b)), should guide decision-making by territorial authorities. We submit that the government and local councils should make harm prevention and reduction a key focus of all gambling policy reforms they undertake.

- 2.2 Gambling harm in society:** The Salvation Army Oasis sees the detrimental effect of gambling harm on the wellbeing of communities around New Zealand. Research supports our observations which indicate that the range of potential harms from gambling span multiple domains of individual and community wellbeing, including mental, physical, spiritual, whānau, community, financial wellbeing as well as employment and productivity.<sup>1</sup> Research also shows links between gambling and social issues such as domestic violence and child neglect and abuse.<sup>2</sup> While estimates of the prevalence of problem gambling vary, it is likely that between three and eight percent of adult New Zealanders are currently placed at risk by their gambling<sup>3</sup>, which could equate to 300 to 800 Buller citizens. A further 8% (or 800 people) could be harmed by another person's gambling<sup>4</sup>. Policy remains one of the most effective means of addressing this harm.
- 2.3 Class 4 Gambling:** The Salvation Army Oasis is particularly concerned with Class 4 gambling machines, also known as non-casino gaming machines (NCGMs), as most of the harm observed in New Zealand is from this form of gambling.<sup>5</sup> Class 4 gaming machines is still the most accessible mode of gambling in New Zealand, with over a thousand outlets nationwide hosting almost 15 thousand machines.<sup>6</sup> While a few practices are required to minimise and prevent gambling harm, one of the best-supported strategies is to limit access to gaming machines.<sup>7</sup>
- 2.4 Harmful Gambling:** Problematic gambling prevalence rates are much higher among those who participate in continuous forms of gambling like NCGM (Pokie) machines, with up to 30 percent of players experiencing severe harm. In New Zealand, around

<sup>1</sup> Bellringer, M. E., Janicot, S., Ikeda, T., Lowe, G., Garrett, N., & Abbott, M. (2020). New Zealand National Gambling Study: Correspondence between changes in gambling and gambling risk levels and health, quality of life, and health and social inequities. NGS series report number 9. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

<sup>2</sup> Palmer du Preez, K., Bellringer, M., Pearson, J., Dowling, N., Suomi, A., Kozlowski, J., Wilson, D., & Jackson, A. (2018). Family violence in gambling help-seeking populations. *International Gambling Studies*, 18(3), pp. 477-494.

<sup>3</sup> Rossen (2015) [Prevalence rate among those aged 15 and older]; Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2014). *New Zealand 2012 National Gambling Study: Gambling Harm and Problem Gambling – Report Number 2*. Gambling & Addictions Research Centre, Prepared for the Ministry of Health. Auckland: AUT University. [Prevalence rate among those aged 18 and older]. Statistics New Zealand (2018) Buller District. Retrieved from [Place Summaries | Buller District | Stats NZ](#)

<sup>4</sup> Palmer du Preez, K., Lowe, G., Mauchline, L.R., Janicot, S., Henry, N., Garrett, N., & Landon, J. (2020). Enhancing support provided to family and affected others in New Zealand gambling services: An exploratory mixed methods study. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

<sup>5</sup> Rossen (2015).

<sup>6</sup> Department of Internal Affairs. (2020). *Gaming Machine Profits (GMP) Quarterly Dashboard September 2020*. Retrieved from [gambling statistics historical data venues machine numbers - dia.govt.nz](#)

<sup>7</sup> Pearce, J., Mason, K., Hiscock, R., & Day, P. (2008). A national study of neighbourhood access to gambling opportunities and individual gambling behaviour. *Journal of Epidemiology & Community Health*, 62(10), pp. 862-868; Vasiliadis, S. D., Jackson, A. C., Christensen, D. & Francis, K. (2013). Physical accessibility of gaming opportunity and its relationship to gaming involvement and problem gambling: A systematic review. *Journal of Gambling Issues*, 28.



one in five people who play gaming machines regularly are likely to be problem gamblers.<sup>8</sup> It is highly likely that there are people experiencing harm within most Class 4 venues of New Zealand, including those in Buller. In our experience, many people can become addicted to gaming machines if they play them regularly.

- 2.5 Te Tiriti o Waitangi:** Gambling addiction can be found across all groups in society, but it is those groups at the lower end of the socioeconomic spectrum that suffer most. As Māori are over-represented in the lower socio-economic groupings, this is a direct breach of article three of Te Tiriti o Waitangi which requires the Crown to promote equity between tangata whenua and other citizens of Aotearoa New Zealand.<sup>9</sup> Other groups most likely to be in poverty and hardship include women, sole-parent families, Pacific peoples, refugees, people living with disability or illness, beneficiaries, and people in low-paid employment.<sup>10</sup> Continued failure to address and respond to these inequities is unjust and constitutes a violation of Te Tiriti o Waitangi.
- 2.6 Social Equity:** The Salvation Army Oasis believes that the values of justice, fairness, community stability and safety are paramount in our community. Class 4 gambling has contributed to an increase in disparity between the richest and poorest members of the population. This disparity entrenches and creates poverty, which is associated with the substantial number of people accessing Salvation Army food banks. We believe making a profit based on the losses of those impacted by harmful gambling and the exploitation of vulnerable people is unjust.
- 2.7 Unsustainable Funding Model:** The Salvation Army Oasis maintains that the Class 4 community funding model is not sustainable in the long-term or favourable in the short-term, where social services can become reliant on funding from the very whānau and communities they are trying to support to wellbeing.<sup>11</sup>
- 2.8 TABs:** As discussed above, reducing the availability of gambling products is a key measure to reduce harm from gambling at the population level, and this applies to TAB products as well as gaming machines. There is less available data on TAB venues and their impact on communities, besides national expenditure (and much less regionally-specific data). The Health and Lifestyles Survey indicates that about 10 percent of New Zealanders participated in horse or dog race betting in the past 12 months.<sup>12</sup>

<sup>8</sup> Department of Internal Affairs (2008). Problem Gambling in New Zealand – a brief summary. Retrieved from [https://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/\\$file/ProblemGamblingFactsFinal.pdf](https://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/$file/ProblemGamblingFactsFinal.pdf).

<sup>9</sup> Manatu Hauora (2019). *Treaty of Waitangi Principles*. Retrieved from [Treaty of Waitangi principles | Ministry of Health NZ](#).

<sup>10</sup> Centre for Social and Health et al. (2008); Centre for Social and Health at al. (2010); Abbott, et al. (2014).

<sup>11</sup> Salvation Army, PGF Services and Hapai Te Hauora (2020). Ending community sector dependence on pokie funding White Paper

<sup>12</sup> Thimasarn-Anwar, T., Squire, H., Trowland, H. & Martin, G. (2017). Gambling report: Results from the 2016 Health and Lifestyles Survey. Wellington: Health Promotion Agency Research and Evaluation Unit.

- 2.9 Buller position:** Buller District currently has eight Class 4 gambling venues, with a total of 72 machines. The Class 4 gambling losses in 2022 were over two and a half million dollars (\$2,565,217)<sup>13</sup>, around \$100,000 more than 2021. Of this, approximately \$842,000 was returned to the Buller Community in grants, which means that around two thirds (\$1.72 million) of this loss leaves the Buller community. This equates to a significant loss to the Buller Community
- 2.10** Buller region has a steady or decreasing population of around 10,000 people,<sup>14</sup> with a growing Māori population (Buller District Council Long Term Plan 2021-31). Māori are at higher risk of harm from gambling (see item 2.5).
- 2.11** As the population forecast for Buller District shows a slow decrease and a growing Māori population, it seems imprudent to maintain a policy which allows for an increase in a harmful form of 'entertainment' such as pokie machine gambling.

### 3 SUBMISSION

- 3.1** The Salvation Army Oasis Christchurch commends the Buller Council on their consideration of a sinking lid policy. We support this option. A sinking lid is considered the best policy to limit the harm caused by class 4 gambling<sup>15</sup>.
- 3.2** We also recommend a no relocations policy for Buller. This supports a true sinking lid policy as numbers slowly decline over time. It also means that a venue cannot be placed into a medium to high deprivation area that may result in more potential for harm.
- 3.3** TABs: We propose that a sinking lid policy be applied to TABs. This will decrease exposure and access to gambling venues overall.

### 4 CONCLUSION

- 4.1** In making this submission we are advocating on behalf of our clients, their families and whanau and the wider community that we engage with. We believe there is a need for Class 4 gambling machines and TABs to be significantly regulated due to the level of associated harm. We acknowledge the Buller District Council's inclusion of The Salvation Army Oasis in this process.

<sup>13</sup> Department of Internal Affairs (2023). *Gaming machine profits*. Retrieved from: [Gaming Machine Profits \(GMP\) Dashboard – Quarterly GMP Dashboard Statistics \(CSV machine readable\) - data.govt.nz - discover and use data](#)

<sup>14</sup> Buller District Council (2023). retrieved from <https://bullerdc.govt.nz/media/z0udrkyb/21-31-ltp-final-with-audit-report.pdf>

<sup>15</sup> Erwin, C., Pacheco, G. & Turco, A. (2021). *The Effectiveness of Sinking Lid Policies in Reducing Gambling Expenditure*. Journal of Gambling Studies (2022) 38:1009–1028